

Application Ref: NP/21/0819/FUL

Case Officer	Kate Attrill		
Applicant	Southern Roots Organics		
Agent	Mr Llyr Evans, Llyr Evans Planning Ltd		
Proposal	Full Planning permission for 5x polytunnels, tracks, yard, new access, drainage works including pond and associated works for agricultural use.		
Site Location	Land adjoining Penrallt, Velindre, Crymych, Pembrokeshire, SA41 3XW		
Grid Ref	SN09063993		
Date Valid	20-Dec-2021	Target Date	13-Feb-2022

This application has been brought to Committee at the request of the Chair of Committee.

Consultee Response

Nevern Community Council: Objecting
Natural Resources Wales: Concern
PCC - Transportation & Environment: Conditional Consent
PCNPA Tree and Landscape Officer: Conditional Consent
PCNPA Planning Ecologist: No adverse comments
PCC - Drainage Engineers: Observations

Public Response

A site notice and neighbour notification letters were posted in accordance with requirements of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.

13 third party responses in support of the application were received, whilst objection was received from the Community Council.

The Community Council's response read:

‘The views of the majority of the Community Councillors concerning the planning permission sought by Southern Roots Organics remains the same as previously stated.

The proposal consists of five large polytunnels together with tracks, yard, ponds, new access, drainage works and associated works, in a sensitive and highly valued landscape, this is a totally excessive development on a green field site in the historic village of Nevern.

Be it for agriculture/horticulture, it is stated by Mr Payne that ‘Without this planning permission we would still be growing field crops at this site as it is integral to our livelihoods’. Five large polytunnels and tracks through many fields is excessive in starting a business. The Polythene to be used to cover these greenhouses maybe biodegradable – but this will be over many years – and the lifespan of the coverings is relatively short. Concerns for NCC are there are many such greenhouses being erected in the area and it is changing the whole ethos of our countryside.

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Planning permission has previously been successful (by default) for agricultural barn and packing shed at this location. (NP/20/0525/PNA). Any development on this at Penrallt by Southern Roots Organics should be carefully monitored, further planning application only considered on the same field and adjacent to, the agricultural barn and packing shed.

Nevern Community Council recommend Refusal

Policies considered

Please note that these policies can be viewed on the Policies page Pembrokeshire Coast National Park website –

[Local Development Plan 2 - Pembrokeshire Coast National Park](#)

LDP2 Policy 01 - National Park Purposes and Duty

LDP2 Policy 07 - Countryside

LDP2 Policy 08 - Special Qualities

LDP2 Policy 09 - Light Pollution

LDP2 Policy 14 - Conservation of the Pembrokeshire Coast National Park

LDP2 Policy 29 - Sustainable Design

LDP2 Policy 30 - Amenity

LDP2 Policy 32 - Surface Water Drainage

LDP2 Policy 59 - Sustainable Transport

LDP2 Policy 60 - Impacts of Traffic

PPW11

SPG03 - Landscape

SPG12 - Biodiversity

TAN 05 - Nature Conservation and Planning

TAN 12 - Design

TAN 23 - Economic Development

TAN 24 - The Historic Environment

Constraints

Biodiversity Issue

Ancient Monument - within 500m

Recreation Character Areas

Affordable Housing Submarkets

Landscape Character Area

Officer's Appraisal

Site and Context

The site lies on rising land to the east of St Brynachs Church and Nevern Castle, above Nevern village. The site falls within the Landscape Character Area 25,

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Cemaes Head. The Scheduled Ancient Monument of Nevern Castle lies just over 500 metres to the west of the site.

Relevant Planning History

NP/20/0525/PNA Prior notification for 2 agricultural buildings – Permitted

NP/21/0515/FUL Full Planning permission for 5x polytunnels, tracks, yard, new access, drainage works including pond and associated development for agricultural use
Refused Oct 2021

Description of Proposal

The application seeks permission for 5 polytunnels, a concrete yard to service the two buildings applied for and approved under NP/20/0525/PNA, tracks and infrastructure relating to a proposed agricultural veg-box business.

An existing site access has been widened but this is not being applied for retrospectively, rather the access is being moved further away from the corner to improve visibility.

A number of 'chattels' have been brought onto the land for amenity purposes, which comprise a shepherds hut, a mobile/timber kitchen, a compost toilet, and a shipping container which are not included within this application. As these are not considered development, they do not technically require planning permission as long as their use is only ancillary to the use of the land for agriculture.

Key Issues

The application raises the following planning matters:

- Policy and Principle of Development
- Siting, Design and Impact upon the Special Qualities of the National Park
- Amenity and Privacy
- Access and Parking
- Landscaping & Biodiversity
- Drainage

Policy:

The site lies within the open countryside as defined by the Pembrokeshire Coast National Park adopted Local Development Plan (LDP) and Policy 7 is the relevant strategic policy which allows for release of land depending: on the character of the surroundings, and the pattern of development in the area'.

Siting, Design and Impact upon the Special Qualities of the National Park

Policy 8 of the Pembrokeshire Coast National Park Local Development Plan 2 (LDP2) is a strategy policy which refers to the special qualities of the National Park and lists priorities to ensure that these qualities will be protected and enhanced.

Policy 14 of the LDP2 seeks the conservation of the Pembrokeshire Coast National Park with criteria (a) and (b) resisting development that would cause significant visual intrusion and/or, that would be introducing or intensifying a use which is incompatible with its location. Criteria (c) and (d) resists development that would fail to harmonise with or enhance the landform and landscape character of the National Park and/or fails to incorporate important traditional features.

Policy 29 of LDP2 requires all development proposals to be well designed in terms of place and local distinctiveness (criterion (a)).
Parts of the Pembrokeshire Coast National Park are still relatively undeveloped with minimal impact of lighting on the night sky.

Policy 9 seeks to conserve that character and limit the impact of lighting which could negatively impact on the special qualities of the National Park.

The site lies within the Cemaes Head Landscape Character Area, as defined within the Landscape Character Assessment SPG.
The characteristics of remoteness, tranquillity and wildness are described at paragraph 6.3.13.

6.3.13 Remoteness, Tranquillity and Wilderness: These feelings can be experienced in widely contrasting landscapes within the National Park. The relatively open character of the high uplands of the Mynydd Preseli range and Mynydd Carningli, together with a lack of shelter and cover, provides a strong sense of exposure amongst the summits and on the upper slopes of these hills. They provide a sense of space and isolation, allowing for moments of reflection and calm away from the bustle of everyday life. Whilst this feeling of upland exposure is not much replicated elsewhere within the National Park, it can be experienced at Strumble Head and at Cemaes Head.

The previous refused application (NP/21/0515/FUL) did not include any assessment of the visual impact of the proposals, whereas this application has been submitted with two appraisals, one by the applicant, and one by a third party, in the form of a Landscape and Visual Impact Assessment.

The previous application was recommended for Refusal on the basis of potential harm to the landscape and insufficient information having been provided to show otherwise.

The submitted LVIA's were commented on by Natural Resources Wales. Their comments read: *'we welcome the submission of the Landscape and Visual Impact Assessment (LVIA) and note that whilst polytunnels are not a traditional characteristic feature of this landscape, the scale of the proposal would not have a substantial adverse effect on the character of the area.*

The yard and track are characteristic features of the agricultural landscapes and of limited visual impact.

The proposed mitigation in the form of native woodland blocks and hedgerow planting would further reduce the visual impact and provide enhancements to the site boundaries in keeping with the LCA25 management guidelines'.

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NRW went on to suggest an amended layout plan be submitted which takes account of the recommendations of the LVIA, and this was submitted on the 24th January 2022.

Having asked the applicant to include additional viewpoints in the LVIA, these have been included and the summary assessment is that the proposals will not have a significant visual impact on the special characteristics of the landscape.

Whilst the Community Council are echoing their previous objection to the application, they have not mentioned the landscape appraisal or any specific impact on the landscape, referring instead to a number of such applications and that the 'ethos' of the countryside is being changed.

Following a site visit by the Case Officer, the siting has been confirmed as the best which could be achieved on this land holding and will be further screened by the packing shed and agricultural barn approved under NP/20/0525/PNA if they are built. There was discussion on whether the barns submitted under the PNA could be re-located as part of this application, but the applicants did not wish to pursue that option.

Having carefully examined the visual impact as a result of the scale of the proposals in combination with the siting of the polytunnels, the development is not considered to be likely to lead to harm to the special qualities of the National Park, and therefore, is considered to comply with Policies 8, 9, 14 and 29 of the LDP.

Amenity and Privacy:

Policy 30 of LDP2 refers to 'amenity' in general with criteria (a) and (b) seeking to avoid incompatible development and significant adverse impact upon the amenity enjoyed by neighbouring properties.

The proposed works follow the boundary of a neighbouring property, from where there had previously been concerns that the landscaping suggested was insufficient to protect residential amenity. These concerns have not been submitted in regard to the revised application.

Whilst the use of the land is agricultural and this is not proposed to change, the manner in which the land will be managed will be potentially much more intensive in nature. However, the distance between the dwelling and the land is such that there should not be a detriment to residential amenity sufficient to refuse the application. As such the proposed development is considered to comply with Policy 30 of LDP2.

Access and Parking:

The Highways Authority have been consulted in respect to any potential impact on traffic or highway safety. Their consultation response is copied below.

'The existing access has fairly recently been widened, with a large parking/loading/turning area and with gates set well back, but the main danger with the access remains as the visibility looking towards oncoming traffic is very poor.'

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This cannot be improved, particularly to be suitable for this more intensive use proposed, without tree loss and a visibility splay across a long section of bend in the County Road.

The proposed access will be much better in terms of location and visibility.

The gates will be set back and there will be a yard area in front of the proposed sheds where vehicles will be able to park and turn. The existing access area will be stopped up with a new hedge bank and a copse created behind'.

Subject to a condition relating to the access and visibility splays, the proposed development is considered to comply with Policies 59

& 60 of the Pembrokeshire Coast National Park Local Development Plan.

Landscaping & Biodiversity:

To comply with Planning Policy Wales (2021) and the Environment (Wales) Act 2016 planning authorities are expected to ensure every development positively contributes to biodiversity.

The Authority's Tree and Landscape Officer has been consulted with regards to the submitted proposals, and a condition to ensure that a full landscaping scheme is submitted to an approved, prior to works has been suggested.

The PCNPA Ecologist has been consulted with the proposals and had no objection provided works are undertaken in accordance with Section 7 of the submitted ecological report by Landsker ecology. The recommendations made in Section 7 are welcomed and would result in overall biodiversity for the site.

The application is therefore considered to comply with the Local Development Plan, Planning Policy Wales and the Environment (Wales) Act 2016.

Drainage:

The Drainage Engineers at Pembrokeshire County Council have been consulted with the development proposals and have raised no objection.

They have confirmed that SAB consent will be required for this development.

Conclusion

Notwithstanding the Community Council comments, the proposed scheme is considered to be acceptable in terms of scale, form, use and design. The development will not cause an unacceptably detrimental impact to the special qualities of the National Park. It is not considered that the development will cause an unacceptable impact upon privacy or amenity of neighbouring properties. Ecology and landscape features will not be adversely affected by the development.

As such, the proposal complies with policies 1, 7, 8, 11, 14, 29, 59 & 60 of the adopted Local Development Plan 2020 and can be supported.

Recommendation

APPROVE, subject to the following conditions:

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1. The development shall begin not later than five years from the date of this decision.

Reason: Required to be imposed pursuant to Section 91 (1) of the Town and Country Planning Act 1990 (as amended).

2. The development shall be carried out in accordance with the following approved plans and documents:

Preliminary Ecological Assessment by Landsker Ecology

Proposed Site Layout Plan received 24/01/2022

Location Plan 1 Of 7

Tree Report

Polytunnels Cross Section 6 of 7

Polytunnels Elevations 4 of 7

Polytunnel Floor Plan 5 of 7

Polytunnels Plan 7 of 7

Reason: In order to be clear on the approved scheme of development in the interests of protecting visual amenity and the special qualities of the National Park. Policy: Local Development Plan 2 – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park) and 29 (Sustainable Design).

3. Prior to works commencing, site details of the access, visibility splays and turning area shall be submitted to and approved by the Local Planning Authority. The scheme shall be implemented and maintained as approved.

Reason: To enable vehicles to enter or leave the premises with a minimum of interference to the free flow of through traffic and in order that the through traffic capacity of the road is not prejudiced.

4. No development, demolition or site clearance shall take place until there has been submitted to and approved in writing by the local planning authority a scheme relating to the immediate landscape.

The approved scheme shall include the following details:

- Clarification of planting / landscaping proposals
- Scale plan on proposed site layout showing precise site specific locations
- Schedules of plants (trees and hedges)
- Plant species
- Plant supply sizes
- Proposed numbers of each proposed species
- Hedge planting density and method (e.g. double staggered)
- Implementation programme / timescale / phasing of planting
- Management and replacement of failures details
- Protection of retained hedgebanks during the development.
- Pembrokeshire Hedgebank translocation method statement
- New Pembrokeshire Hedgebank implementation (cross-section)

The proposed development shall be completed in full adherence to the

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details submitted to this authority. Any variations to the details of the documents and plans must only be undertaken after the proposed variations have been approved in writing by this authority.

Reason: In the interests of maintaining a suitable scheme of landscaping to protect the visual amenity of the area, to maintain the special qualities of the landscape and habitats through the protection, creation and enhancement of links between sites and their protection for amenity, landscape and biodiversity value. Local Development Plan 2 – Policies: 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation and enhancement of the Pembrokeshire Coast National Park), 30 (Amenity), Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009), Technical Advice Note (TAN) 10: Tree Preservation Orders (1997).

5. The works must be undertaken in accordance with Section 7 of the submitted ecological report by Landsker ecology.

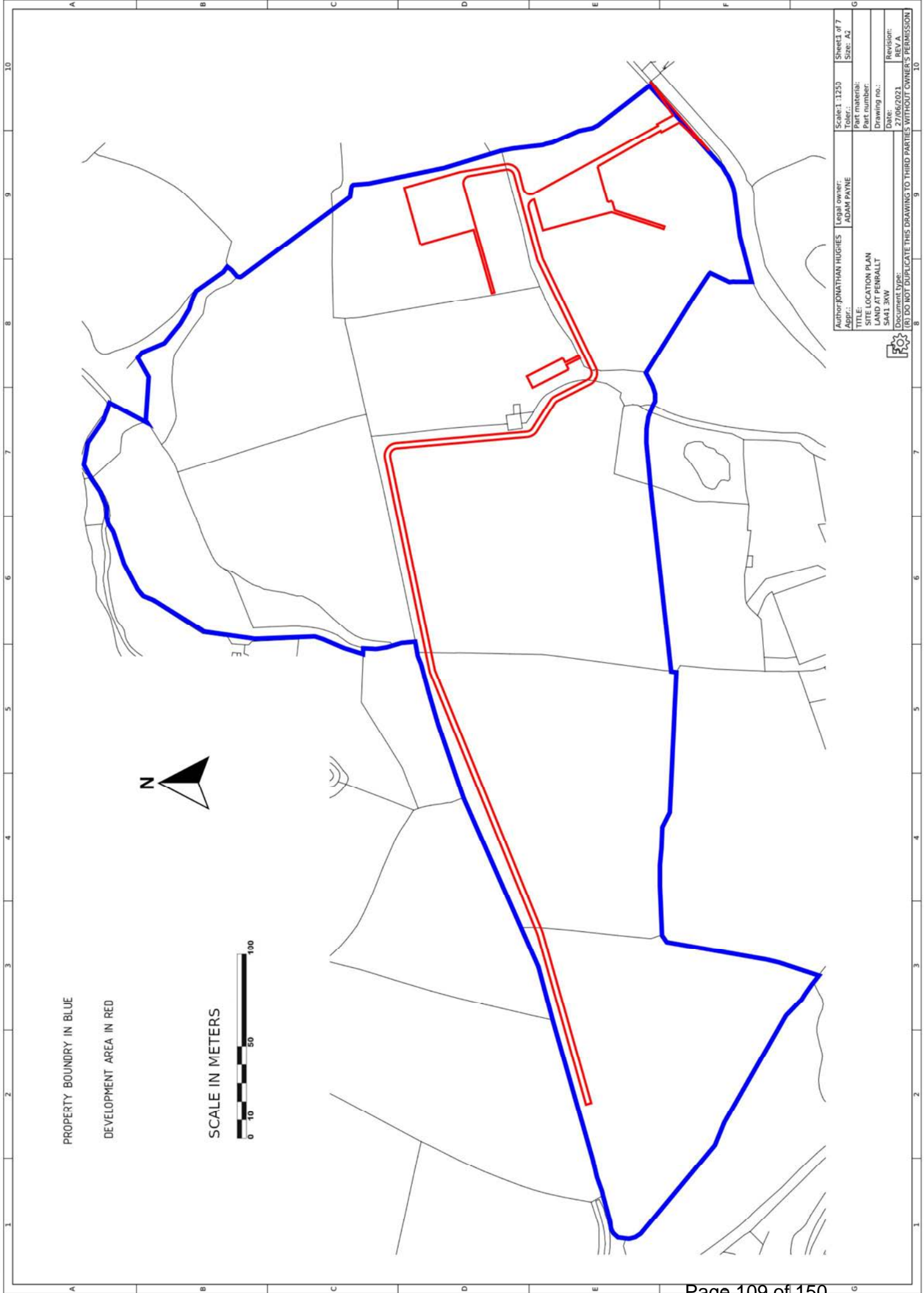
Reason: To comply with the Wildlife & Countryside Act 1981 (as amended), the Conservation of Habitats and Species Regulations 2017 and the Environment (Wales) Act 2016 and Policy 11 of the Pembrokeshire Coast National Park Local Development Plan.

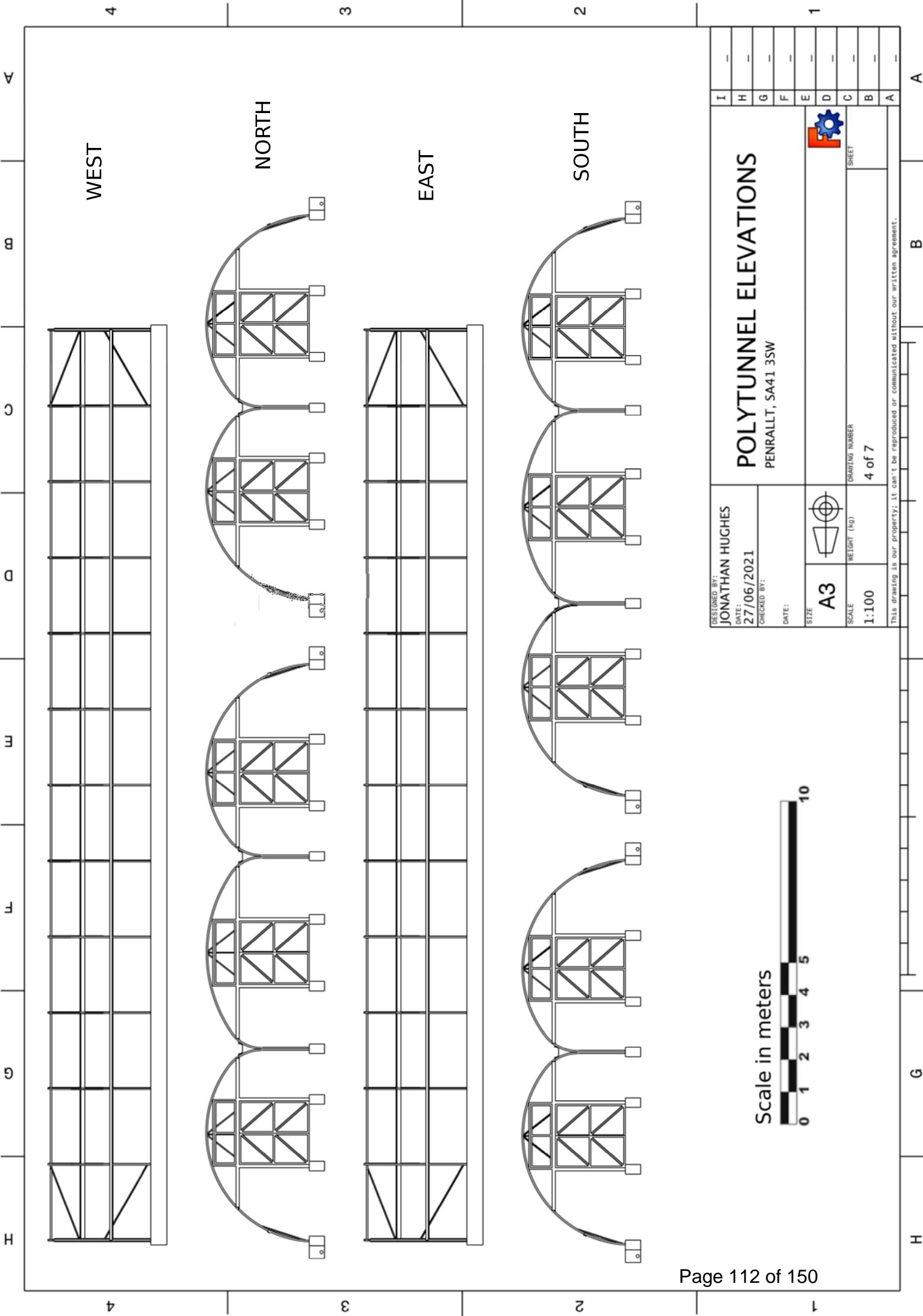
6. There shall be no sales of any produce direct to the public from the site or the farm gate.

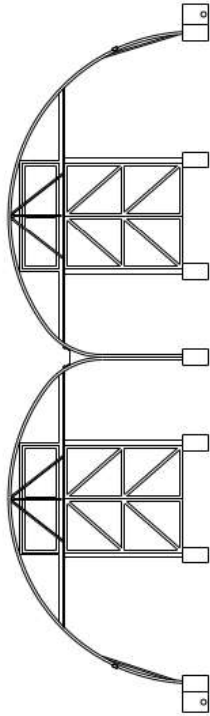
Reason: In the interests of protecting the special qualities of the National Park and in the interests of highway safety in accordance with Policies 7, 8, 14, 59 & 60 of the Pembrokeshire Coast National Park Local Development Plan.

7. There shall be no lighting provided on the site or buildings hereby approved, without the prior approval of the Local Planning Authority.

Reason: In accordance with Policies 8, 14, & 9 of the Pembrokeshire Coast National Park Local Development Plan.



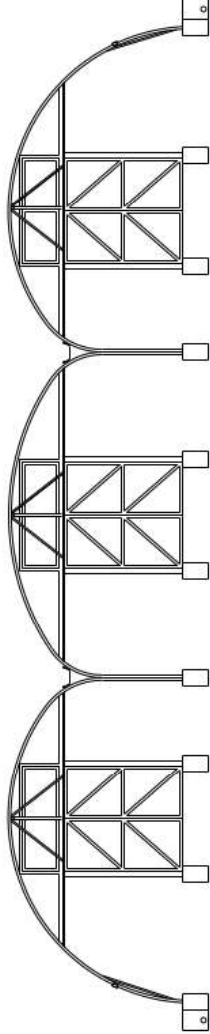
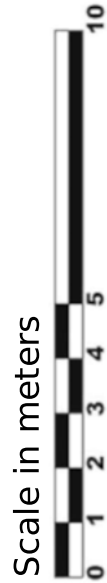




**POND - LINED WITH 150mm
COMPACTED CLAY SUBSOIL**



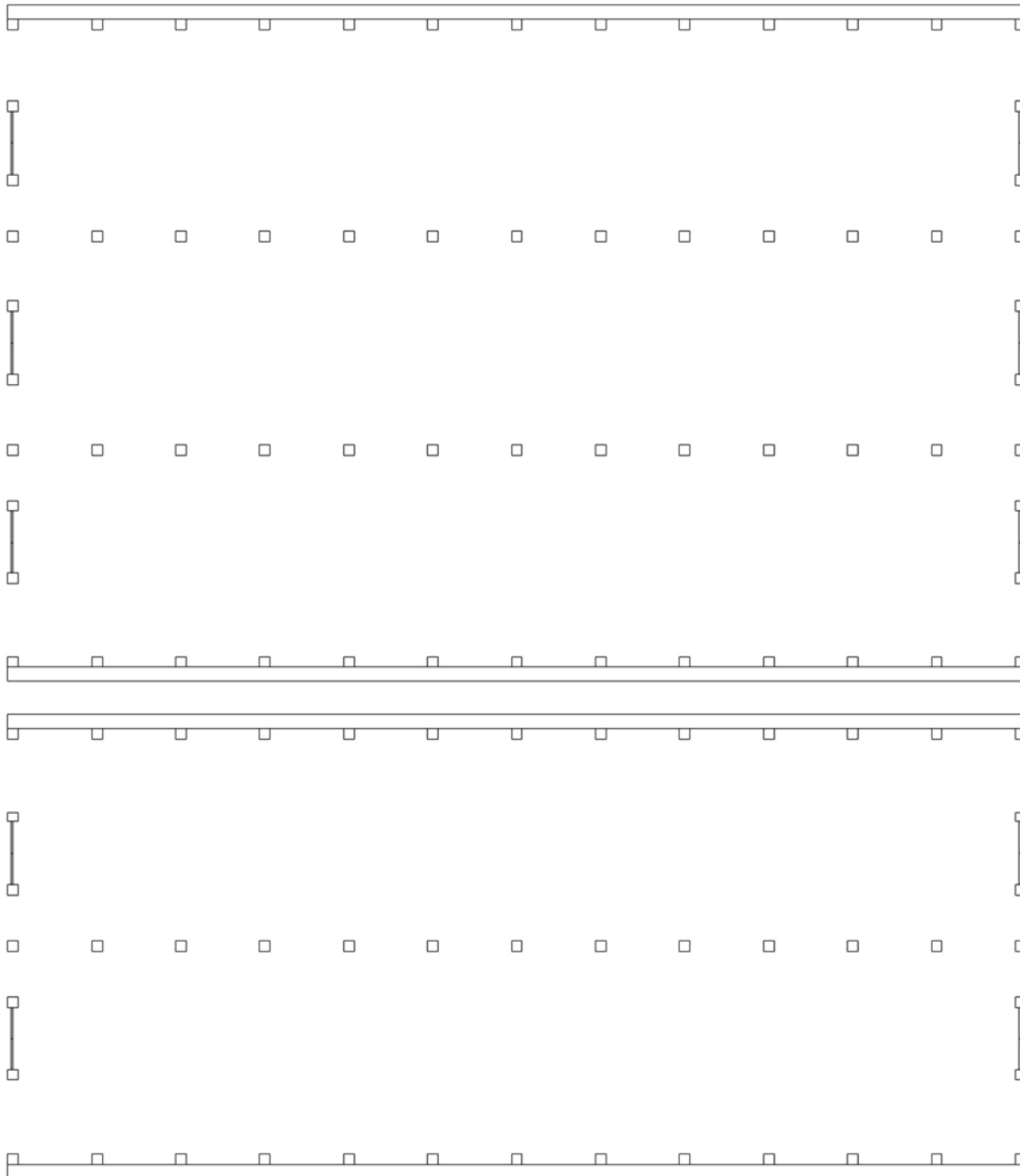
TRACK - 150mm COMPACTED HARDCORE




Polytunnel Materials:

- Hoops, wind bracing and ridge pole are 50mm galvanised steel tube
- Internal horizontal crop bars are 32mm galvanised steel tube
- Guttering is 3mm galvanised steel
- The entire structure is covered by clear polythene
- The sides are overlaid from ground level to 1m with side vents made from tight weave green insect mesh. The polythene behind can be lifted to assist with air flow. These are fixed with 45mm x 90mm timber at ground level and 1m
- Doors and end vents are made from 45mm x 90mm timber and covered in clear polythene
- Foundations are concrete pads with a drainage pipe and gravel filled trench running along long edges

Created by: JONATHAN HUGHES	Title: CROSS SECTIONS		
Supplementary information:	Size: A3	Sheet: 1:100	Scale: 1:100
	Part number: 6 of 7		
	Drawing number: 6 of 7		
Date: 27/06/2021		Revision: 27/06/2021	



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	Size A2	Sheet 5 OF 7	Scale 1:100
	Drawing number: 5 OF 7		
Date: 27/06/2021			Revision: 

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