

Application Ref: NP/23/0220/FUL

Case Officer	Charlotte Broome		
Applicant	Mr Lawrence		
Agent	Mr Wyn Harries MRICS, Harries Planning Design Management		
Proposal	Erection of a roof covering with cubicles over existing nutrient store and a replacement roof and frame for an existing agricultural building		
Site Location	Pointz Castle Farm, Pen Y Cwm, Haverfordwest, Pembrokeshire, SA62 6BA		
Grid Ref			
Date Valid	26-Apr-2023	Target Date	20-Jun-2023

This application is being presented to the Development Management Committee due to it being classed as a 'major development'

Consultee Response

Brawdy Community Council: Supporting
PCC - Drainage Engineers: Conditional consent
PCC - Public Protection: Supporting
PCNPA - Planning Ecologist: Conditional consent
CADW – Protection & Policy: No objection
Mid & West Wales Fire & Rescue Service: No adverse comment
Dwr Cymru Welsh Water: No adverse comments
Natural Resources Wales: Conditional consent
The National Trust: No response

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.
No responses were received.

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 04 – Supporting Rural Communities
LDP2 Policy 07 - Countryside
LDP2 Policy 08 - Special Qualities
LDP2 Policy 09 - Light Pollution
LDP2 Policy 10 - Sites and Species of European Importance

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LDP2 Policy 11 - Nationally Protected Sites and Species
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 33 - Renewable Energy & Low Carbon Energy
PPW11
SPG02 - Landscape
SPG05 - Seascape Character
SPG06 - Archaeology
SPG07 - Biodiversity
SPG16 - Sustainable Design & Development
TAN 05 - Nature Conservation and Planning
TAN 12 - Design
TAN 24 - The Historic Environment

Constraints

Special Area of Conservation - within 500m
Special Protection Area - within 500m
Safeguarding Zone
Rights of Way Inland - within 50m
Ancient Monument - within 500m
Hazardous Zones
Potential for surface water flooding
Nat Trust Covenants
Recreation Character Areas
Affordable Housing Submarkets
Seascape Character Areas
Landscape Character Area

Officer's Appraisal

Site & Context

Pointz Castle Farm is a dairy and arable farmstead of approximately 800 acres, circa. 3km south-east of Solva and situated circa. 760m north of the coastline. Of the 800 acres associated with the application farm, half is dedicated to arable farming. The enterprise rents a further 200 acres and has an overall dairy herd of 350 cattle. The development site is an existing and operational agricultural facility which has diversified to also include the sale of ice cream from a café within the farm complex.

The farming complex of Pointz Castle Farm is split by an unclassified access road which leads westwards directly off the A487. The application site area and the majority of farm buildings are located to the south of the access road. A gradually

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sloping surfaced farm track runs south from the access road, through the farm complex and a series of gates to reach the application site and beyond.

The existing application site nutrient store is on the southern fringe of the existing farm buildings and has an open aspect to the south-west. The land levels slightly adjacent to the store and features a series of ponds which feed into a watercourse running south-west towards the coast. Beyond the ponds, the agricultural land gradually rises to the east, south and west. Modest hedgerows and a substantial earth-bank to the east afford an element of screening. The existing portal-frame building is parallel to the farm track, to the rear of the café and central within the farm complex.

Neighbouring properties in the vicinity are situated to the east of the application site and existing farm buildings are positioned between these properties and the application site.

The site is within the 'St Brides Bay' Landscape Character Area LCA 12 as defined in the Authority's Landscape Supplementary Planning Guidance; and the 'St Brides Bay coastal waters north' Seascape Character Area similarly defined in the Authority's Seascapes SPG.

The site is located within approximately 500m of the following protected marine sites: St David's Special Area of Conservation (SAC), St David's Peninsula Coast Site of Special Scientific Interest (SSSI) and Ramsey and St David's Peninsula Coast Special Protected Area (SPA).

The site is also within 1km of two Scheduled Ancient Monuments.

Site and Proposed development

This application seeks permission to construct a cattle store in place of the current existing nutrient store (by constructing elevations and a roof); and to replace an existing concrete portal framed building with a galvanised steel portal frame and new roof. Both buildings/areas are positioned within an existing group of agricultural buildings and together form an L-shape.

The replacement portal-frame building will be a galvanised steel portal frame with box profile cladding on the same footprint (circa. 29m x 14m) as existing. The roof height will be raised to circa. 7.5m (similar to adjoining building to the west) and in line with the adjacent new cattle store roof to the south. The 15° roof pitch will be the same for both application buildings.

The new cattle store will similarly adopt the existing footprint (circa. 60m x 21m) of the nutrient store. The north-east elevation will be open-sided and the south-west elevation will be box profile clad, rising to circa. 4.5m to the eaves. Concrete panelling will feature on the lower section of the store's south-eastern elevation. The roof will be fibre cement covering and PV panels will be installed across the span of the southern aspect roof profile. Due to the falling topography, the tallest height of the roof ridgeline at any one point will be circa. 10m (south-eastern corner).

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The submitted planning statement includes justification of the proposal, which is to enable all cattle to be kept adjacent to one another and to reduce rain-water runoff into the nutrient store. It also emphasises that the proposed development will not enable an increase in the number of livestock on site and the intention is to reduce the herd size to 300.

The proposed development and site are detailed in the accompanying plans.

Relevant Planning History

NP/18/0153/FUL - Change of use of existing agricultural buildings to create ice cream production facility (Farm Diversification Scheme in connection with existing dairy operation). Approved 9th May 2018

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
- Surface Water Drainage
- Pollution Prevention & Biodiversity
- Archaeological Remains and Historic Landscape

Policy and Principle of Development:

Future Wales – The National Plan 2040 (FW), was adopted on 24th February 2021 and is the National Development Framework for Wales, and the national tier of the Development Plan. Policy 4 Supporting Rural Communities states that Strategic and Local Development Plans must identify their rural communities, assess their needs and set out policies to support them. On page 104, Future Wales states that: “National Park Authorities are unique planning entities with a specific remit to reflect the distinctive characteristics of their areas...” and that “Future Wales policies respect the functions of National Parks in terms of their statutory purposes...”

Policy 1 of the Pembrokeshire Coast National Park Local Development Plan (LDP) sets out the National Park’s purposes and duty, in order to ensure that development within the Park is compatible with these.

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 the release of land depending on the character of the surroundings, and the pattern of development in the area. Part (g) of Policy 7 allows for new farm buildings which are justified for agricultural purposes. The application site has been previously developed and is currently operational as an agricultural facility.

As such, the principle of the development complies with the relevant policies of the adopted Local development Plan (LDP) and can be supported.

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

Policy 8 of the Pembrokeshire Coast National Park Local Development Plan (LDP) 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 LDP seeks the conservation of the Pembrokeshire Coast National Park, resisting development that would cause significant visual intrusion, be insensitively or unsympathetically sited within the landscape, and/or fail to harmonise with, or enhance the landform and landscape character of the National Park.

Policy 29 of the LDP requires all development proposals to be well designed in terms of place and local distinctiveness.

The proposed development is situated on existing land that has been developed for agricultural purposes, in an area rural in nature with significant agricultural activity taking place locally. The buildings proposed for development inherently maintain a functional character and the proposal is consistent with the form and bulk of the surrounding group.

There is no increase to the footprint from the existing buildings nor encroachment into undeveloped land. The addition of elevations and a roof to the existing nutrient store will augment the presence of the agricultural complex from the south. However intervening topography to the east and south-east will screen the development in middle to long distance views. As far as is possible, the cattle store building will not compound the visual intrusion on the landscape, blending with the existing sight line of the building group.

Overall the development will not cause an unacceptably detrimental impact to the special qualities of the National Park. As such, the development complies with policies 8, 14 and 29 of the LDP and can be supported.

Surface Water Drainage:

Policy 32 of LDP2 requires that development will be required to incorporate sustainable drainage systems for the disposal of surface water on site. This is to minimise adverse environmental impacts during construction and upon completion.

From 7th January 2019, all new developments of more than 1 no. property or where the construction area has drainage implications of 100m² or more, will require sustainable drainage systems (SuDS) for surface water. The SuDS must be designed and built in accordance with Statutory SuDS Standards published by the Welsh Ministers and SuDS Schemes must be approved by the local authority acting in its SuDS Approving Body (SAB) role, before construction work begins.

Pembrokeshire County Council as SuDS Approving Body (SAB) considers that by virtue of the fact that the proposals where the construction area having drainage implications appears to be in excess of 100m² and, or accords with the requirements of WG42458 - Welsh Government advice note - SAB applications for agriculture buildings, coverings and clean yards, March 2021, the proposed works will require

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SAB approval prior to the commencement of any works on site relating to this application.

The granting of planning consent for this application would not remove the requirement to gain SAB approval.

No conditions relating to drainage have been requested, and as such, the development is considered to be in accord with Policy 32 of the Local Development Plan.

Pollution Prevention and Biodiversity

PPW, TAN5 and LDP Policy 11 requires biodiversity considerations to be taken into account in determining individual applications. The presence of a species protected under UK or European legislation is a material consideration when dealing with applications that are likely to result in disturbance or harm to the species or its habitat.

The application site is within 50m of a minor watercourse which hydrologically connects to the protected sites aforementioned in the appraisal.

The National Park Planning Ecologist comments that:

Because the proposal will likely improve the existing conditions in terms of slurry storage and water run-off and the development will not allow for an increase in stock numbers, there will be no further contribution to the existing background ammonia emissions at these sites. Therefore no further air quality assessment is required for this application. The development will have a neutral or negligible environmental effect and may even result in a slight betterment.

This sentiment is echoed in the consultation response from PCC Public Protection, who assume that the proposed new roof will prevent rainwaters from entering the nutrient store which could otherwise reduce its capacity for the storage and management of slurry to be utilised as an agricultural nutrient. A roof covering will enable a controlled and less frequent application of the nutrient to land to comply with the recent changes in legislation in the form of The Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021.

Under the Statutory Pre-Application Consultation, NRW advised that a Construction Environment Management Plan (CEMP) condition would likely be requested should any subsequent planning application be submitted. A CEMP was subsequently produced and submitted with the current application. NRW confirm in their consultation response of this current application that they are satisfied with the pollution prevention measures outlined within the document.

The National Park Planning Ecologist additionally comments:

As the location of the development is a sufficient distance from the nearby watercourse to comply with the Silage, Slurry & Agricultural Fuel Oil (Wales) Regulations 2010 which specify a minimum distance of 10m in order to reduce the impacts associated with any potential sub-surface breach it is unlikely that there will

be an impact on the nearby SAC during construction. However the submission of the CEMP provides confidence that the watercourse will be protected from construction run-off. Works must therefore be undertaken in accordance with the submitted CEMP.

In order 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 Planning Ecologist welcomes the proposed bat box, however, further biodiversity enhancement features should be provided in order for the enhancement scheme to be proportionate. A condition is included with this decision to ensure compliance.

In terms of potential light pollution, the lack of additional external lighting is also welcomed.

Overall, the proposed development is considered acceptable in terms of its impact on biodiversity, as such is considered to comply with Policy 11 of the LDP.

Archaeological Remains and Historic Landscape

PPW, TAN24 and LDP policies 8 and 14 require the significance of historical assets to be taken into consideration. This will include consideration of the setting of a historic asset which might extend beyond its curtilage.

The conservation of archaeological remains and their settings is a material consideration in determining a planning application, whether those remains are a scheduled monument or not. Cadw have been consulted as the statutory consultee in relation to the potential impact on the setting of the Scheduled Ancient Monuments (SAM's) and their comments are reproduced below:

'Two scheduled monuments are located inside 1km of the proposed development:

PE539 Dinas Fach Defended Enclosure
PE272 Pointz Castle Mound

Intervening topography, buildings and vegetation block all views between the proposal and PE539 Dinas Fach Defended Enclosure. Consequently, the proposed development will have no impact on the settings of scheduled monument PE539.

The proposed development is also located some 30m south-east of scheduled monument PE272 Pointz Castle Mound. The monument comprises the remains of a medieval castle of which currently only the motte survives. The motte measures some circa 36m in diameter at the base, and some 10.5m in diameter across the top and is some 6m high. For the greater part it is surrounded by a ditch 3m wide with a 1.5m counterscarp and is eroded or has been dug into on the south side. On top there are the footings of a rectangular stone structure. No traces of an outer bailey survive, but surveyors in the 1920s noted that it may have lain in the nearby field to the west called Parc y Castle.

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The nutrient store roof and replacement building will be higher than existing farm buildings that lie between them and the monument, and the proposed development will therefore be clearly visible from it. Whilst there will be an increase to the bulk of built development near to the monument, existing buildings already exceed the height of the castle mound and consequently views out from the monument towards the fields and farmland in this direction will not be affected. As such whilst there may be a very slight visual change in the view from the monument this will not have any effect on the way that it is experienced, understood, and appreciated. Consequently, the proposed development will have no impact on the setting of scheduled monument PE272'.

Overall, the proposed development is considered to have an acceptable impact on archaeological remains and their setting, as such is considered to comply with Policies 8 and 14 of the LDP.

Conclusion

The proposal for a replacement, covered cattle store in place of the nutrient store, and a new replacement portal framed building in place of a similar but dilapidated building are both positioned on the same footprint as existing within the existing farm complex and its associated facilities. This considered location will minimise impacts arising from the development and its ongoing use as far as is possible. The development to the existing nutrient store in particular on the southern fringe of the farm complex will certainly compound the visual bulk of the farm complex. However, this bulk will blend fairly unobtrusively with the wider setting and will not cause an unacceptably adverse impact on the qualities and special landscape and seascape character of the Pembrokeshire Coast National Park.

Despite the close proximity of numerous protected natural sites, the development of the nutrient store should only serve to reduce the potential for runoff and pollution of habitat areas. Overall, the proposal will improve the functional processes of the agricultural activity taking place and create acceptable impacts on ecology and landscape features.

As such, the proposal complies with policies 1, 4, 7, 8, 9, 10, 11, 14, 29, 30, 32 & 33 of the adopted Local Development Plan 2020 and can be supported. The proposal is also considered to comply with the general policies of Future Wales.

In reaching a recommendation, regard has been given to the requirements of Sections 3 and 5 of the Well Being of Future Generations (Wales) Act 2015. It is considered that this recommendation is in accordance with the Act's sustainable development principle through its contribution towards the Welsh Ministers' well-being objective of supporting safe, cohesive and resilient communities.

Recommendation

APPROVE, subject to the following conditions:

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

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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:

Location plan – Drawing No. 01

Proposed block and location plan – Drawing No. 04

Proposed plans & elevations – Drawing No. 05

CEMP – Document dated 21st April 2023

PAC report – Document dated 20th April 2023

Planning statement – Document dated 17th March 2023

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. Before first beneficial use of the development hereby approved, a biodiversity enhancement scheme shall be submitted to and approved in writing by the National Park Authority. To be retained as such in perpetuity.

Reason: In the interests of maintaining the special qualities of the landscape and habitats of the National Park through the protection, creation and enhancement of links between sites and their protection for amenity, landscape and biodiversity value. Policy: Local Development Plan 2 - Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 11 (Protection of Biodiversity), 14 (Conservation of the Pembrokeshire Coast National Park), 30 (Amenity) and to comply with the Wildlife & Countryside Act 1981 (as amended), the Conservation of Habitats and Species Regulations 2017 and the Environment (Wales) Act 2016. Supplementary planning guidance for biodiversity can be found at <https://www.pembrokeshirecoast.wales/wp-content/uploads/2021/06/Post-Cons-Bio-SPG-Eng-1.pdf>

4. The Construction Environment Management Plan (CEMP) dated 21st April 2023 shall be adhered to at all times during construction.

Reason: In the interests of ensuring pollution prevention and in accordance with Natural Resources Wales consultation response.

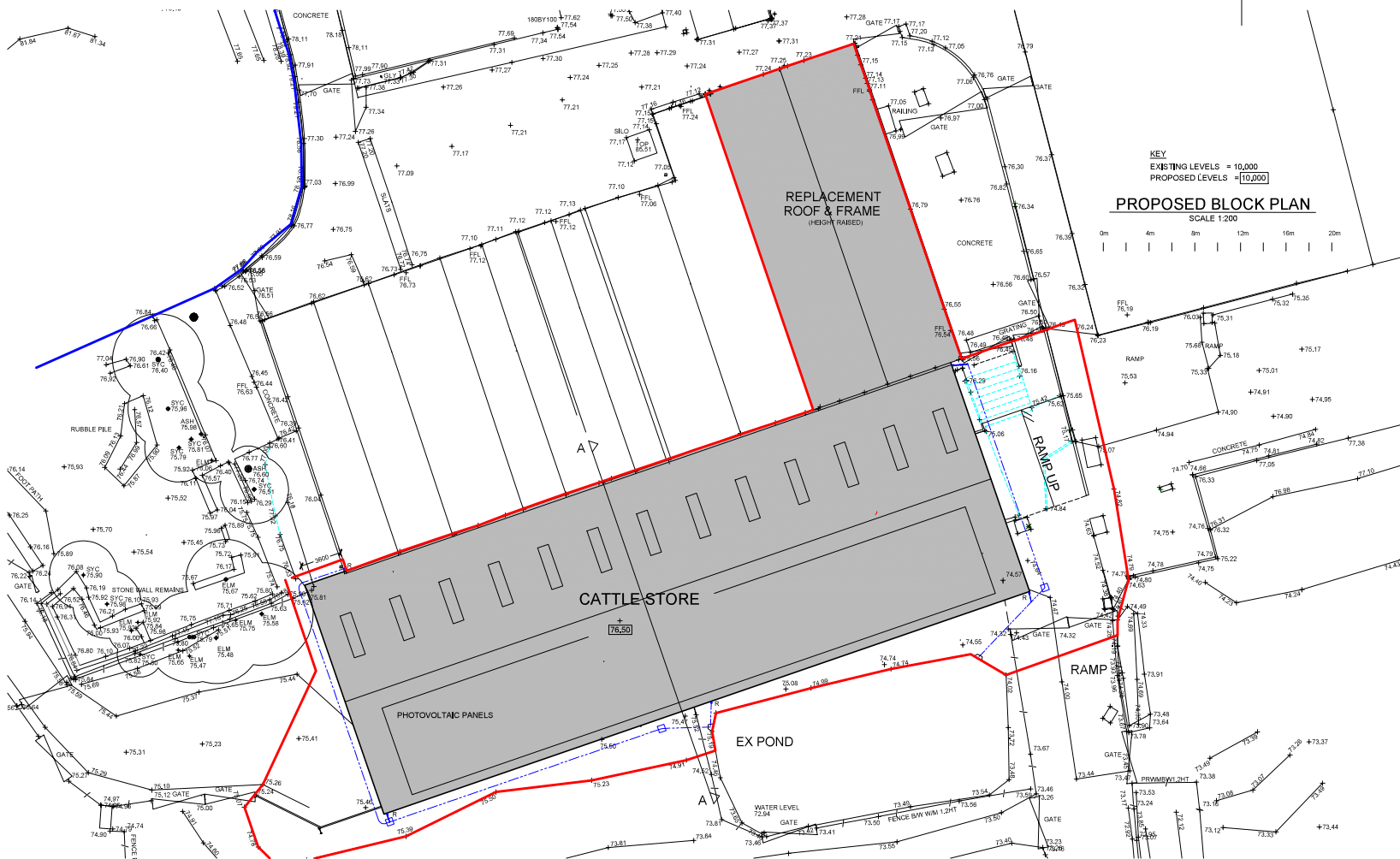
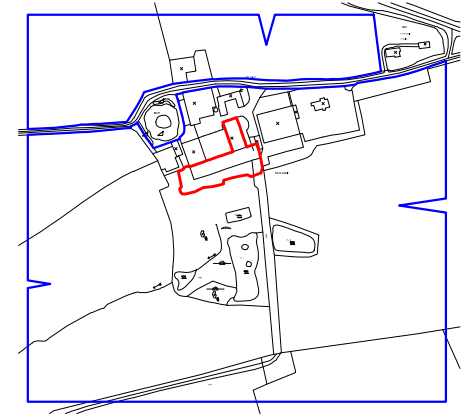
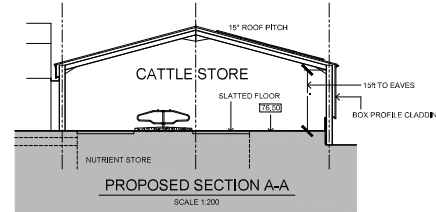
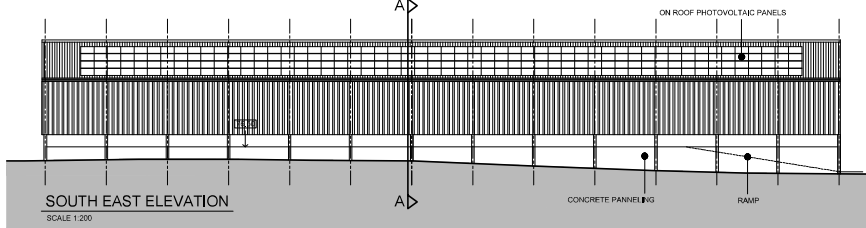
5. Prior to the erection of any external lighting on the approved site a light mitigation strategy, including measures to reduce light spillage/pollution shall be submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.

Reason: To ensure that animal and plant species and habitats listed under the Conservation of Habitats and Species Regulations 2010 are adequately protected, and to protect and enhance the character and appearance of the site and its setting within the Pembrokeshire Coast National Park. Policy: Local Development Plan 2 – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 12 (Local Areas of Nature Conservation or Sites of Geological Interest) 9, (Light Pollution) and 14 (Conservation of the Pembrokeshire Coast National Park).

Informatives

SAB Informative: If there is a breach of the requirement for SAB approval (i.e. when construction work is commenced without SAB approval); the SAB may issue an enforcement notice. Furthermore, the failure to obtain SAB approval might have a detrimental effect upon the future sale of the property, which could also result in insurance applications and or flood event settlements being compromised. If an application for SAB approval has not been made and subsequently approved by the SAB Team as part of a formal SAB Application, they may not be able to support any future application for the discharge of any surface water drainage related condition in connection with this development since any proposals submitted for the discharge of the condition may be subject to change in order to meet Welsh Governments Statutory Standards for Sustainable Drainage Systems. Further information in relation to the requirement for SAB approval is available from www.pembrokeshire.gov.uk/planning-contacts/sustainable-drainage-approving-body-sab

Guidance: NRW advise that it is the applicant's responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to their website (<https://naturalresources.wales/permits-and-permissions/?lang=en>) for further details.



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Rev. Comments. Date.

Status: **PLANNING APPLICATION (PACS)**

Client: **Mr Lawrence**

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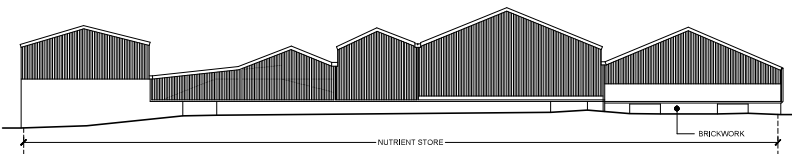
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T: 01239 891 499 F: 01239 891 455 www.hpdm.co.uk

Project: **Proposed Works at Pointz Castle, Pen-Y-Cwm, Haverfordwest, Pembrokeshire, SA62 6BA**

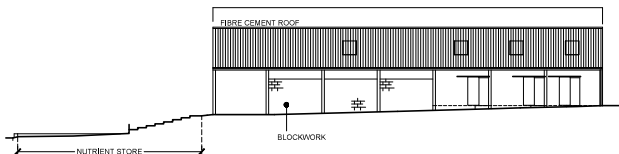
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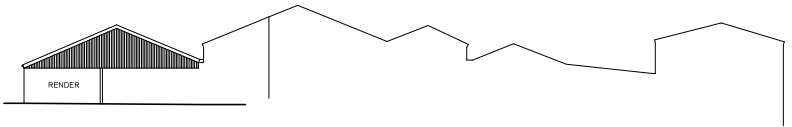
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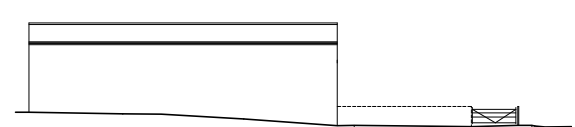
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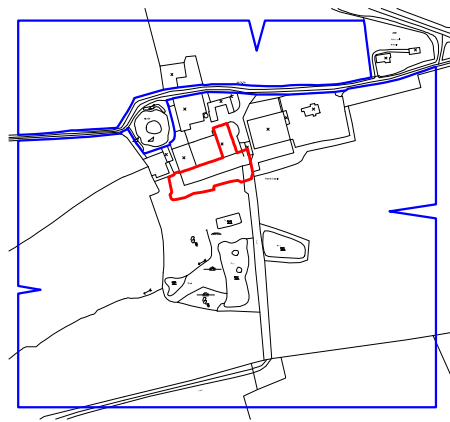
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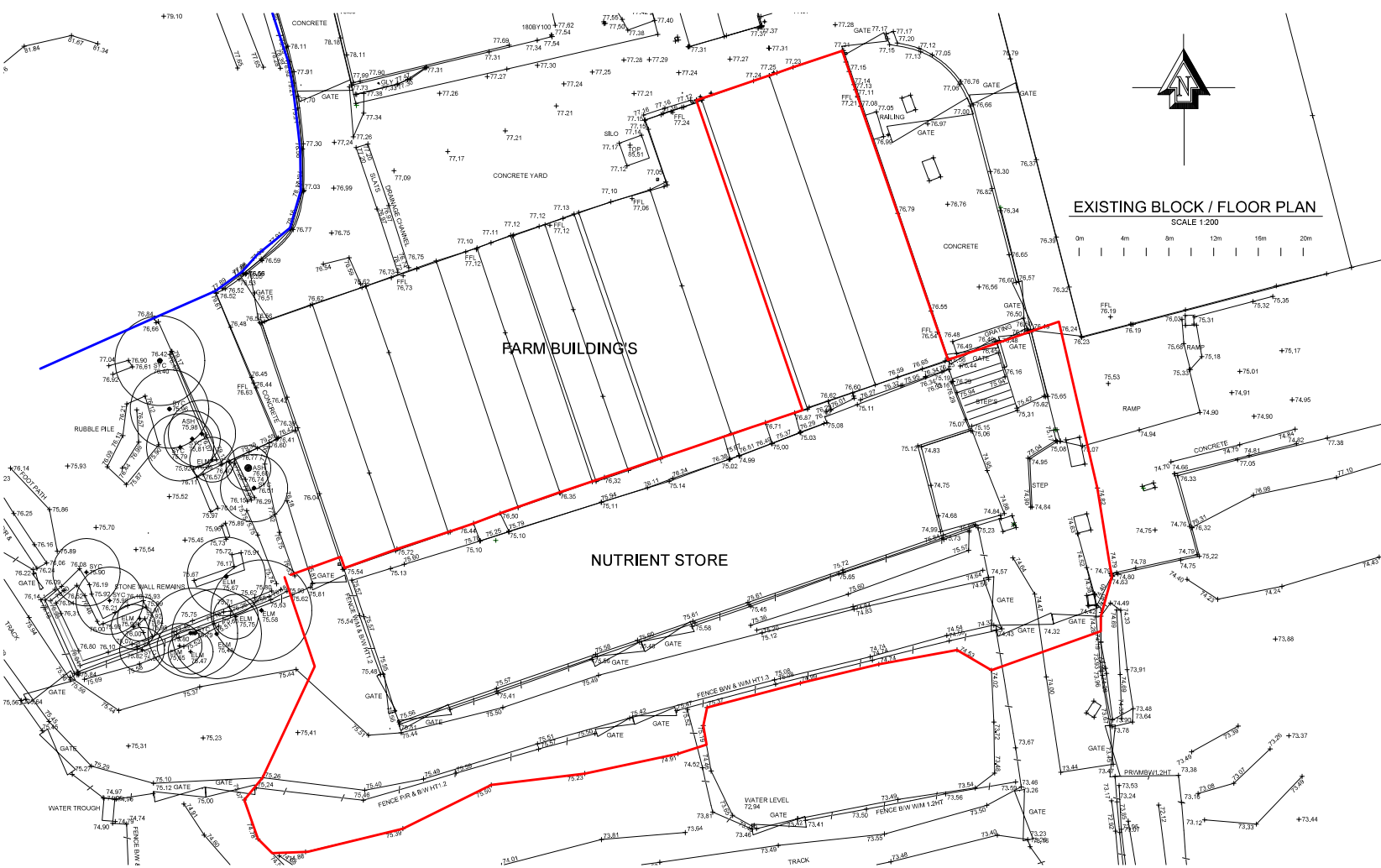
PART NORTH WEST ELEVATION
SCALE 1:200



SOUTH WEST ELEVATION
SCALE 1:200



LOCATION PLAN
LICENSE NUMBER = 100019667
SCALE 1:2500



EXISTING BLOCK / FLOOR PLAN
SCALE 1:200

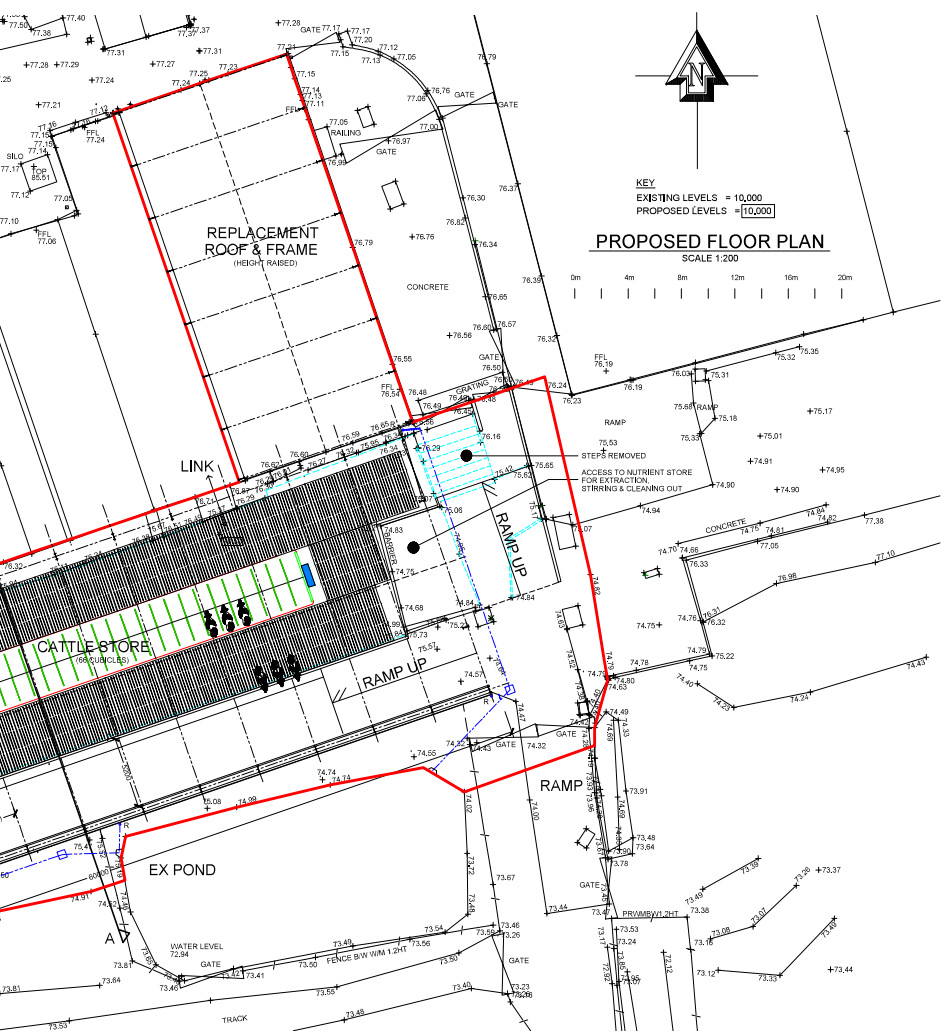
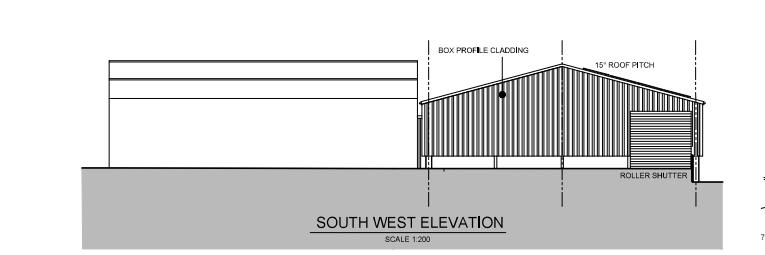
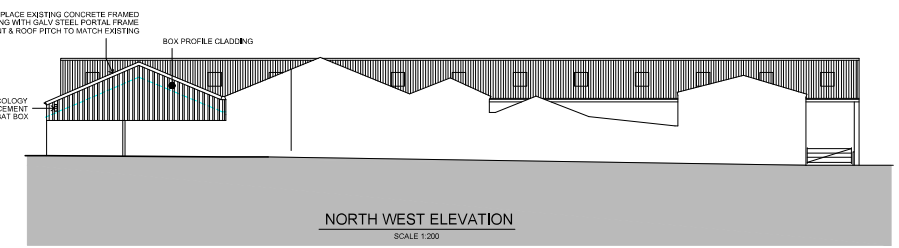
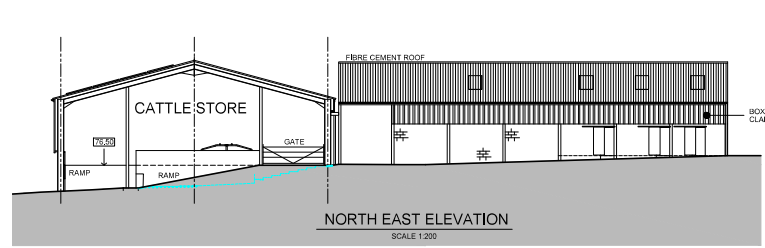
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Project.
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Haverfordwest,
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Drawing Title.	PLANS & ELEVATIONS AS EXISTING		
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Drawing Title:	FLOOR PLAN & ELEVATIONS AS PROPOSED		
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