

**Application Ref: NP/23/0594/FUL**

<b>Case Officer</b>	Bethan Gledhill		
<b>Applicant</b>	Southern Roots Organics		
<b>Agent</b>	Mr Llyr Evans, Llyr Evans Planning Ltd		
<b>Proposal</b>	Full Planning permission for 3 x polytunnels for agricultural use.		
<b>Site Location</b>	Land to North East of Penrallt, Felindre Farchog, Crymych, Pembrokeshire, SA41 3XW		
<b>Grid Ref</b>	SN08964022		
<b>Date Valid</b>	16-Nov-2023	<b>Target Date</b>	06-Feb-2024

**This application is being brought to Development Management Committee, as the original approval was considered by the DM Committee and as the Community Council has supported the application, contrary to the Officer recommendation for refusal.**

**Summary**

This application seeks consent for the erection of 3 polytunnels, one single sized and one double sized, for agricultural use on land to the north-east of Penrallt.

The land is located within the countryside, and there are 5 existing polytunnels and 2 agricultural buildings already located on the site. Whilst the site is well screened from the public highway running to the south of the site (B4582), the site is visible from the wider landscape. An objection has been received from the Authority's Policy Team based upon the cumulative impact that the existing 5 and additional 3 polytunnels would have on this part of the Newport and Carningli Special Historic Landscape and the Scheduled Ancient Monument (Carningli). Based upon this, a recommendation to refuse permission is made.

**Consultee Response**

**Nevern Community Council:** No objections but would like to have the screening of the polytunnels taken into account.

**CADW:** No comments.

**PCC Highways:** No further comments to make.

**Planning Ecologist:** No adverse comments.

**Natural Resources Wales:** No objection.

**PCNPA Access Manager:** No objection subject to informatives being included with any permission.

**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, which requires that proposed developments are advertised by way of either neighbour letters or a site notice. In this case, both methods of notification were utilised in order to ensure notification in an area where many dwellings are only occupied seasonally.

## Item 5 - Report on Planning Applications

Fifteen third party response were received. 12 were in support of the proposal, with the main issues being summarised below:

- The farm is feeding the area. The method of production helps nature thrive.
- Southern Roots Organics are operating a well-run successful business of the kind which meets Welsh Government's strategic aims for land use and climate objectives
- We are neighbours of Awen Organics and fully support their organic market garden and plans to grow more produce for the local community.
- I am in support of this application as I recognise the importance of producing more food in the local area.
- We fully support their application to extend their growing area in all seasons
- Local food is one of the best ways to tackle the climate crisis
- This seems reasonable and proportionate.
- Locally and sustainable grown food is strongly needed in this area
- The applicants are running a successful family farm business, which contributes to the economic wellbeing of our local area.
- The site is producing significant amounts of great veg and I'd like to see them succeed and grow their business further.
- There is a need to produce much more of our food needs locally and in our climate polytunnels are essential for a healthy market garden business.
- The business offers a huge number of positives for our area such as shortening supply chains, creating rural employment, supporting existing businesses, developing local resilience and farming in a truly sustainable way which works with nature and not against it.

3 letters were received which raised concerns to the proposal. The main points are summarised below:

- The existing polytunnels are visible from Carningli and various other viewpoints in this otherwise beautiful part of north Pembrokeshire, especially in the winter and spring. More polytunnels will be more visible.
- We do not want a proliferation of polycarbonate farms in the National Park. The footprint of the polytunnels denies biodiversity.
- The polytunnels are actually very visible from many places on our property

### **Relevant Planning History**

NP/22/0225/DOC - Discharge of condition Nos 3 & 4 of NP/21/0819/FUL - Access & Visibility & Landscaping details - Discharged 28-Apr-22

NP/21/0819/FUL - Full planning permission for 5 x polytunnels, tracks, yard, new access, drainage works including pond and associated works for agricultural use - Approved 09-Mar-22

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 08-Oct-21

## Item 5 - Report on Planning Applications

NP/20/0525/PNA - Agricultural building - Refused

### **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](#)

Future Wales - The National Plan 2040 (FW which was adopted on 24th February 2022)

LDP2 Policy 01 - National Park Purposes and Duty

LDP2 Policy 07 - Countryside

LDP2 Policy 08 - Special Qualities

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

PPW11

SPG02 - Landscape

SPG05 - Biodiversity

SPG15 - Sustainable Design & Development

SPG16 - Seascapes

### **Constraints**

Ancient Monument - within 500m

Recreation Character Areas

Affordable Housing Submarkets

Landscape Character Area

### **Officer's Appraisal**

#### **Site and Proposed development**

The site in question comprises land to the northeast of Penrallt, Felindre Farchog, Crymych. It is situated off the B4582 highway. The site is on a higher land level than the highway and is well-screened from the highway.

This site lies within the countryside and is bound on all sides by open fields. The site is also visible from Carningli, which is situated approximately 3km to the south-west.

There are 5 polytunnels and 2 agricultural buildings on the site at present.

## Current Proposal

This application seeks consent for 3 additional polytunnels, one being a single sized polytunnel, with the other a double sized. The larger polytunnel would be situated to the west of the 5 existing polytunnels, with the smaller one being situated to the north of the 5 existing polytunnels. The additional floor area created by the proposed polytunnels would be 460m<sup>2</sup>.

## 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
- Biodiversity

### *Policy and Principle of Development:*

All planning applications are required by statute to be determined in accordance with the policies of the current development plan, which is Future Wales – The National Plan 2040 (FW) which was adopted on 24th February 2021 and is the National Development Framework for Wales – is 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 2 (LDP) sets out the National Park’s purposes and duty, in order to ensure that development within the Park is compatible with these. These include ensuring that development is compatible with the conservation and enhancement of the natural beauty, wildlife and cultural heritage of the Park.

Policy 7 of the LDP relates to development within the countryside and details the types of development that are acceptable in principle. This includes a rural enterprise where the need to locate in the countryside is essential or an extension to an established business in the countryside is required.

This is a minor application for development. Whilst the proposed polytunnels would be used in conjunction with an established business sited on the land and could be considered appropriate under para d) of Policy 7, their impact upon views around the wider landscape of the National Park is deemed unacceptable due to the reasons outlined in more detail in the following section of this report.

Overall, the proposal is not considered to be appropriate in terms of scale or siting due to the impact upon the surrounding landscape. As such, the development is

## Item 5 - Report on Planning Applications

contrary to Policy 1 of the adopted Local development Plan (LDP2) in that the development is not compatible with the conservation and enhancement of the natural beauty, wildlife and cultural heritage of the Park and therefore and cannot 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 (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. These priorities include protecting the historic environment and protecting the pattern and diversity of the landscape.

Policy 14 of the LDP2 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.

As part of the proposal, 3 polytunnels are to be sited on the site. One would be a single sized polytunnel, and the other would be a double sized polytunnel.

The floor area to be created by the proposal would be 460m<sup>2</sup>. This would be in addition to the floor area of 864m<sup>2</sup> of the existing 5 polytunnels, thus increasing the floor space by over 50%. Whilst the site is well screened from the public highway, the Landscape and Visual Impact Assessment submitted with the application shows that the existing polytunnels are clearly visible in the landscape when viewed from Carningli in particular. This is a particularly sensitive area as part of the landscape falls within a Special Historic Landscape.

In assessing the impact upon the National Park under Policy 14, matters of detail and cumulative impact will be given special consideration. In this case, it is considered that the addition of 3 polytunnels would intensify the use of the site and will result in visual intrusion, and since the site can be seen from Carningli, which is a Scheduled Ancient Monument and is part of the Newport and Carningli Special Historic Landscape, the cumulative visual impact of the existing and proposed polytunnels is deemed unacceptable. The impact on the setting of a Scheduled Ancient Monument is also a material consideration. Therefore, the proposal is considered contrary to Policy 8, 14 and 29 of the LDP2 and cannot be supported.

### *Amenity and Privacy:*

Policy 30 of LDP2 seeks to protect the amenity of people living in the National Park and states that development will not be permitted where there is an unacceptable adverse effect on amenity.

Given that the proposed polytunnels would be situated in excess of 250m of the nearest dwelling, there are no concerns as regards detriment to residential amenity.

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Overall the development is considered to have an acceptable impact on residential amenity and accords with Policy 30 of the LDP.

### *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.

Whilst no biodiversity or ecology enhancements are shown on the plans, if the proposal being supported, it is considered that an appropriate level of biodiversity enhancements could be sought through a suitably worded condition and that would render the development in accordance with Policy 11 of the LDP.

### **Conclusion**

The proposed scheme as submitted fails to accord with both the PCNPA adopted Local Development Plan 2 in the following respects:

The proposed polytunnels would represent an increase in floor area of over 50%, and as such, would be considered to significantly intensify the use of the land which would result in an unacceptable cumulative impact in terms of visual intrusion as they would be clearly visible within the landscape, especially when viewed from Carningli (a Scheduled Ancient Monument). In turn, this would have a harmful impact upon the Special Historic Landscape

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**

REFUSE for the following reason

1. In the opinion of the Local Planning Authority, the proposed polytunnels would result in an unacceptable impact upon the special qualities of the National Park by causing visual intrusion when viewed from the Scheduled Ancient Monument (Carningli) and part of the Newport and Carningli Special Historic Landscape. The proposal would therefore be contrary to Policies 1, 7, 8, 14 and 29 of the Pembrokeshire Coast National Park Local Development Plan 2 (adopted September 2020) and the SPG on Landscape Character.

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Tel: 07826 705493  
E-mail: mail@sureline.org.uk

Site: Southern Roots Organics  
Job: Additional polytunnels  
Client: Adam Payne

Drgs: Location plan  
File: Roots  
Scale: 1:2500 (A4)  
Date: 30/10/23 Drn: MDH  
Drg no: 001 Page: D



208500

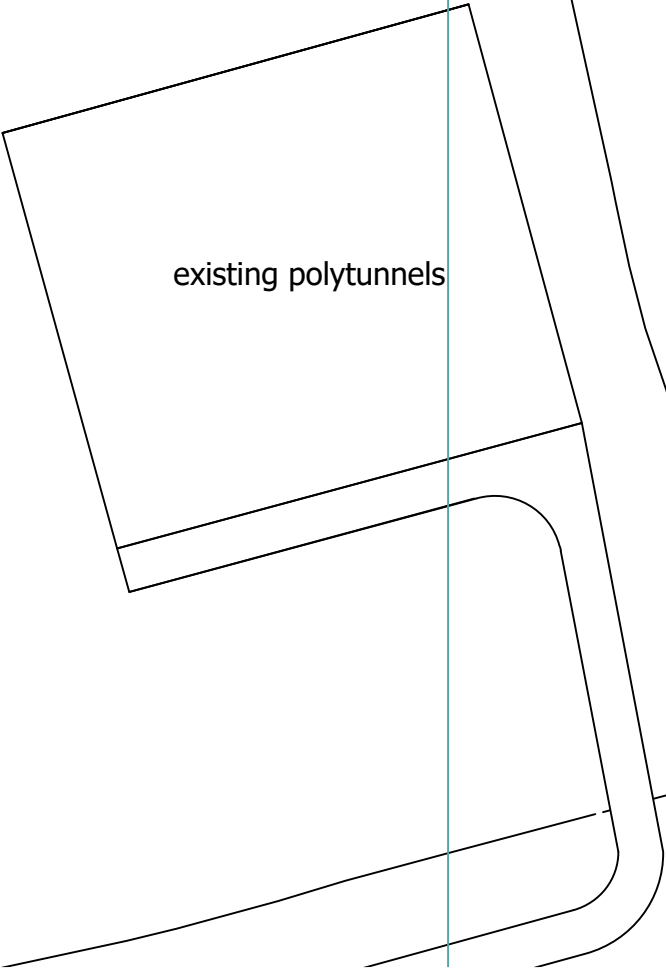
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existing polytunnels

**sureline**  
DESIGN SERVICES LTD

Tel: 07826 705493  
E-mail: mail@sureline.org.uk

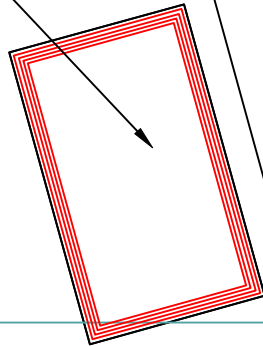
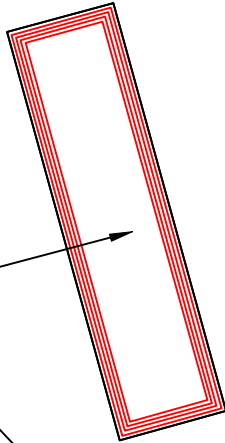
Site: Southern Roots Organics  
Job: Additional polytunnels  
Client: Adam Payne

Drgs: Site plan - existing  
File: Roots  
Scale: 1:500  
Date: 30/10/23 Drn: MDH  
Drg no: 002 D

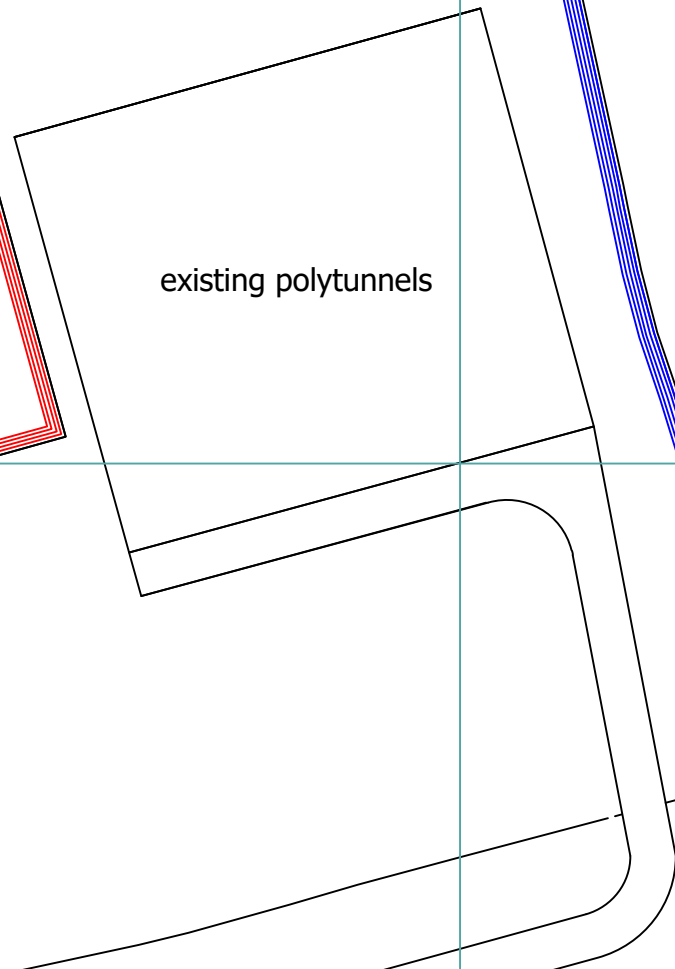




new polytunnel 1  
new polytunnel 2 (double)



existing polytunnels

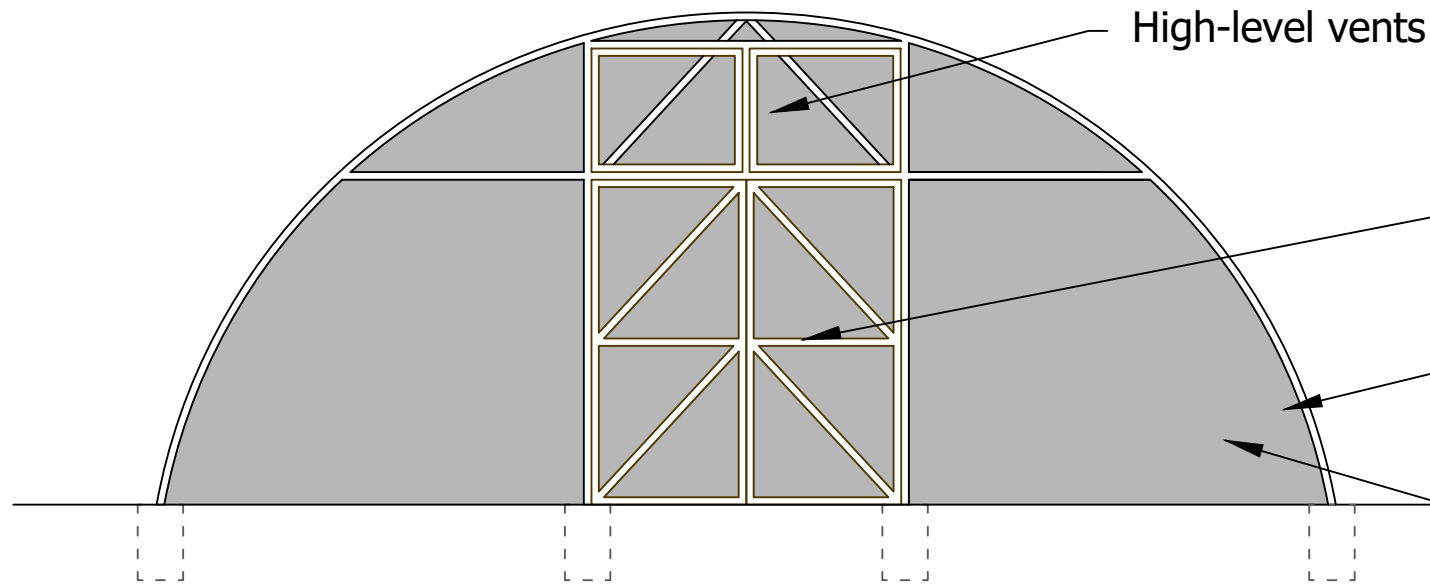


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Drg no: 002 Page: D



front and rear elevations (1:50)

Polytunnel Materials (both polytunnels):

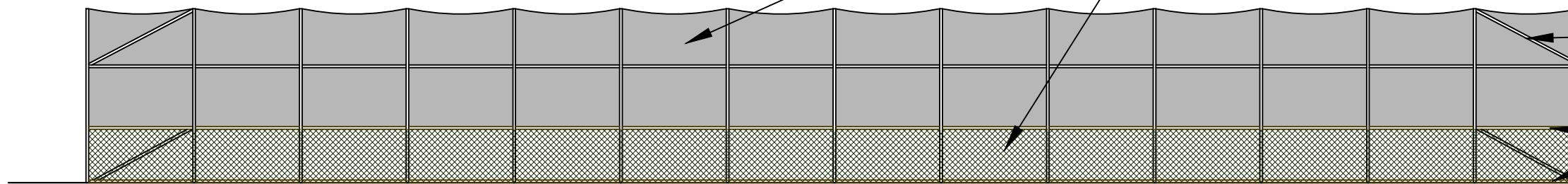
Doors and end vents made from 45x90mm timber and covered in clear polythene

External framework (hoops, wind bracing and ridge pole) 50mm galvanised steel tube

Internal horizontal crop bars 32mm galvanised steel tube

Clear polythene tensile "skin"

Tight weave green insect mesh overlaid to 1m from ground level. Polythene behind can be lifted to assist with air flow.



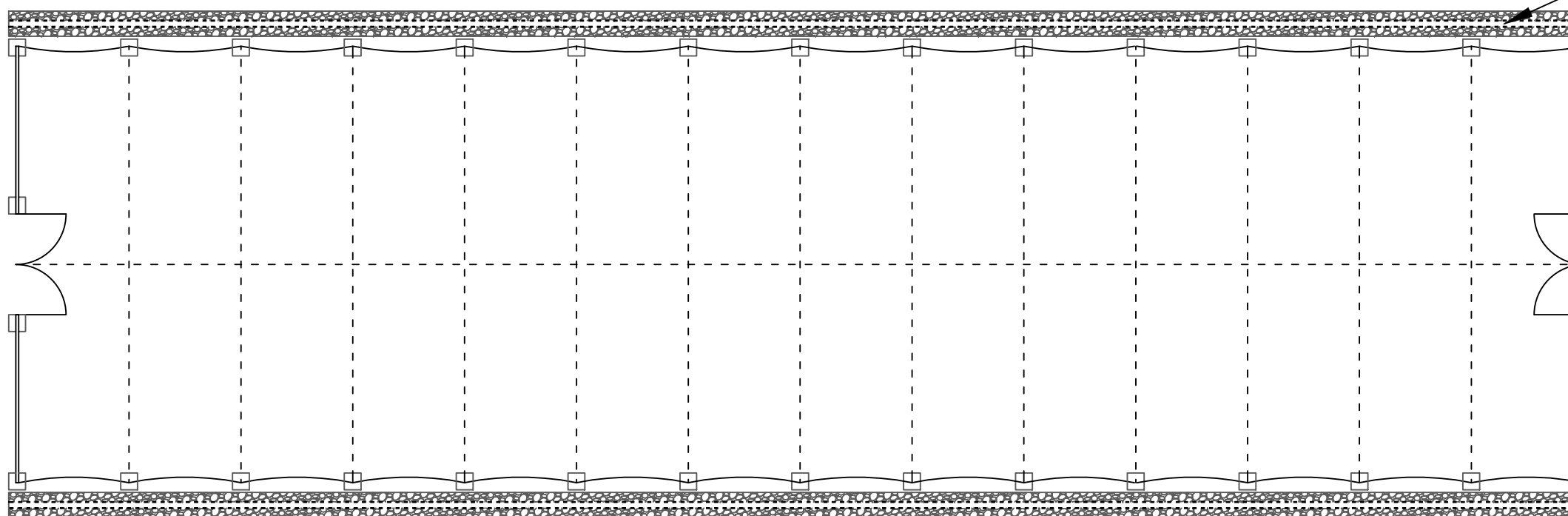
Side elevations (1:100)  
(both sides are identical)

Bracing

45x90mm timber battens at ground level and 1m

French drain (perforated pipe in gravel-filled trench)

Concrete foundation pads



poly-tunnel 1 plan (1:100)

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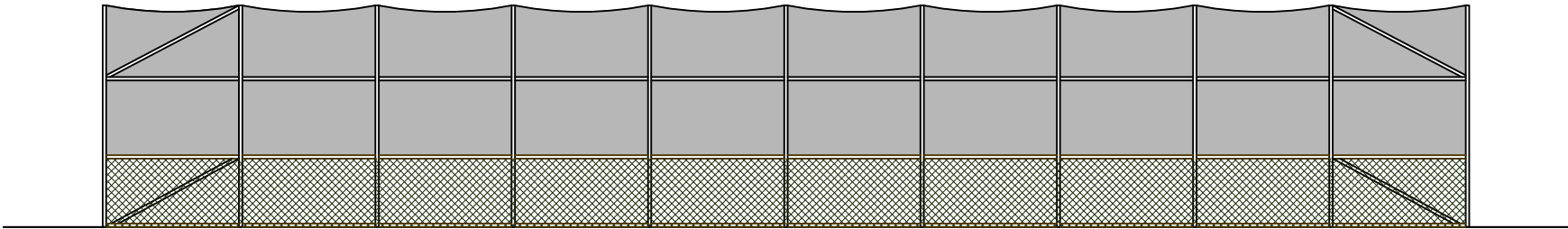
Site: Southern Roots Organics  
Job: Access details  
Client: Adam Payne

Drgs: Polytunnel 1 plans  
File: Roots  
Scale: 1:50 / 1:100 (A3)  
Date: 06/10/23 Dnn: MDH  
Drg no: 101 REV: C

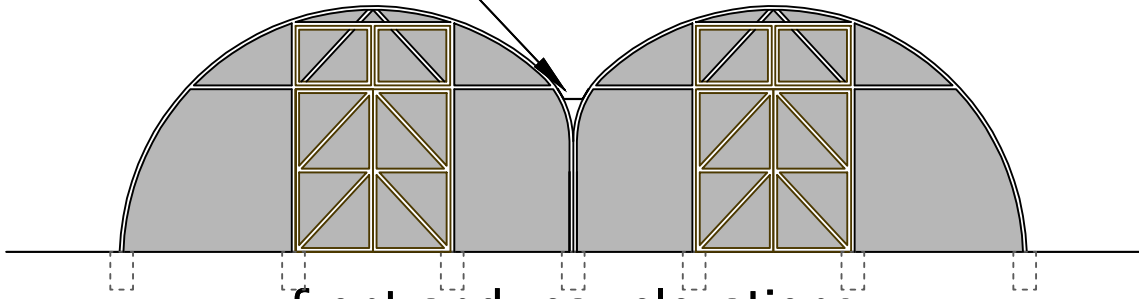
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All dimensions are checked on site prior to ordering materials or starting construction.

3mm galvanised steel gutter  
other materials as polytunnel 1

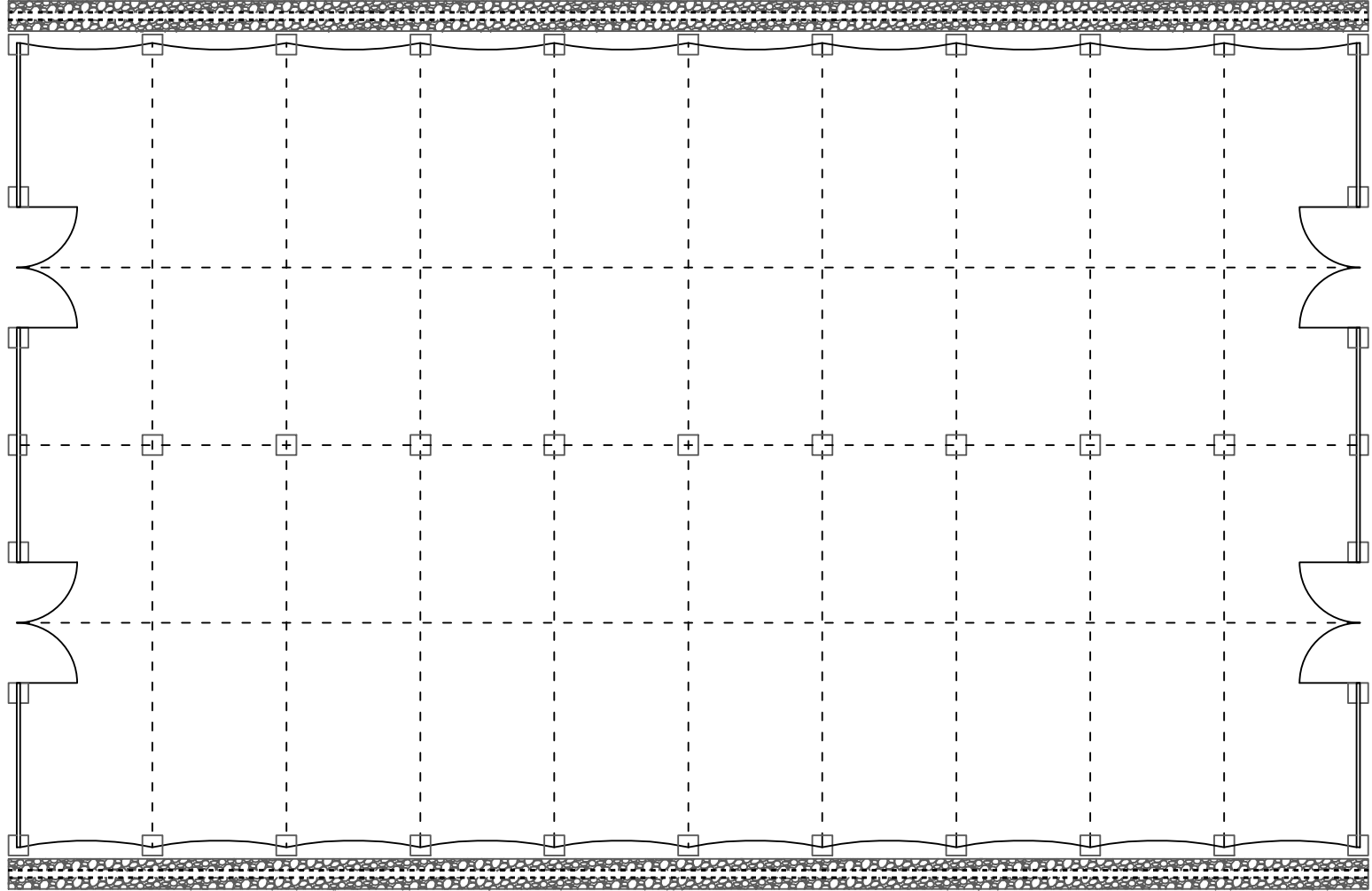
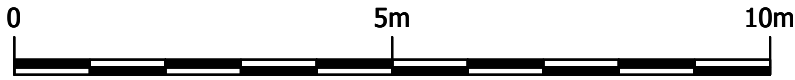
### Polytunnel 2 (double)



Side elevations (both sides are identical)



front and rear elevations



poly-tunnel 2 plan

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DESIGN SERVICES LTD

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E-mail: mail@sureline.org.uk

Site: Southern Roots Organics  
Job: Access details  
Client: Adam Payne

Drgs: Polytunnel 2 plans  
File: Roots  
Scale: 1:100 (A3)  
Date: 06/10/23 Drn: MDH  
Drg no: 102 REV: C

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