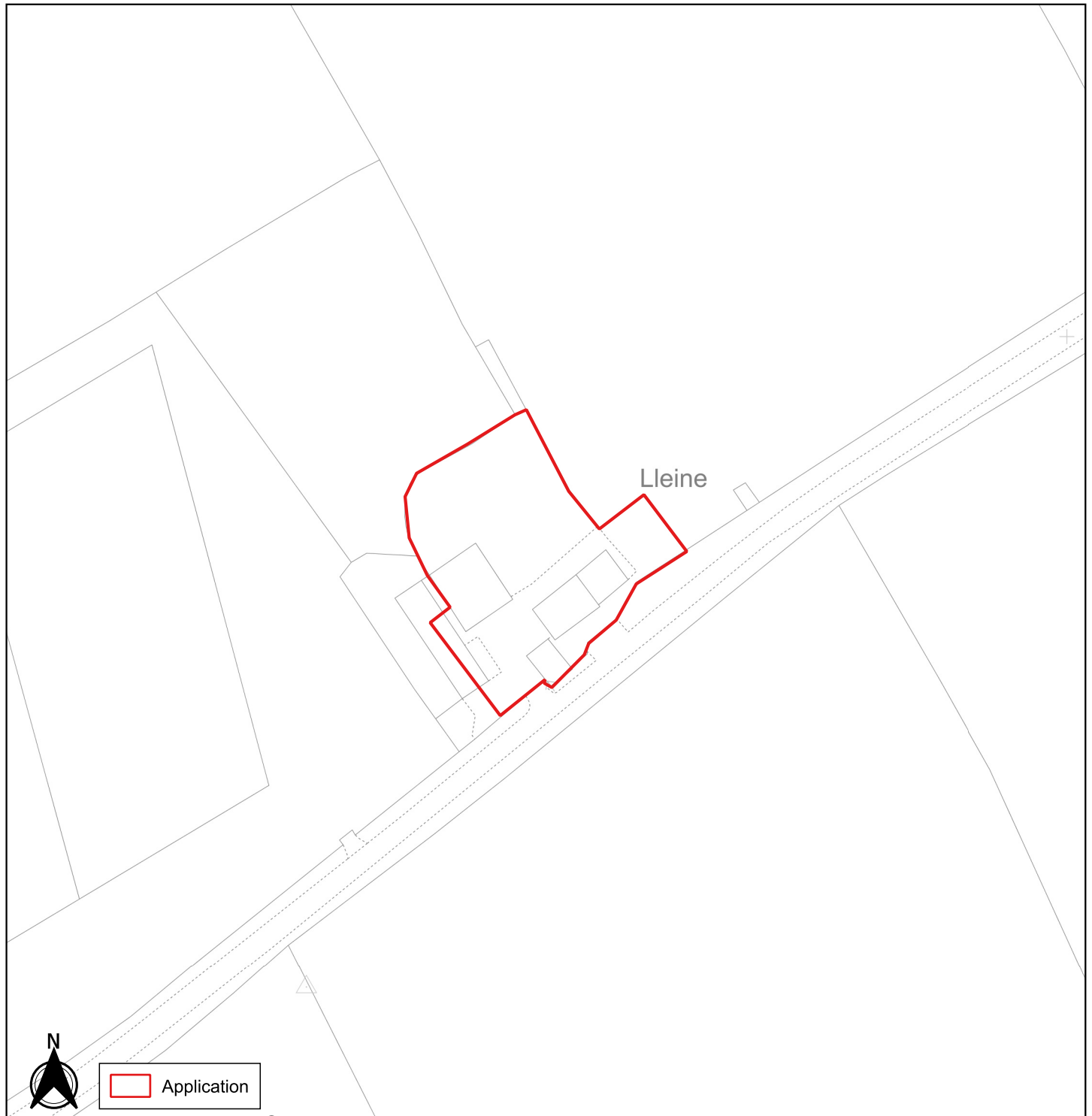
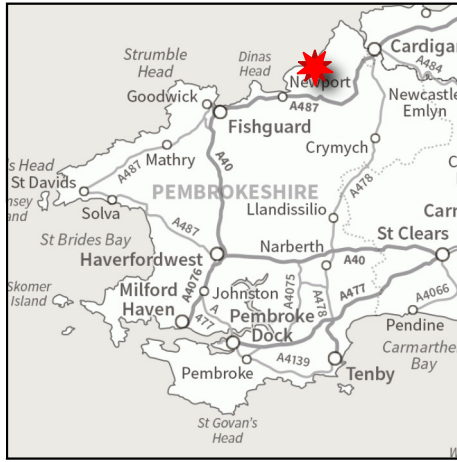




Parc Cenedlaethol
Arfordir Penfro
Pembrokeshire Coast
National Park

Graddfa/Scale: 1:1,250





Ref No: NP/24/0596/FUL
Proposal: Allow habitable rooms in consented building, along with link to existing dwelling
Site Location: Lleine, Nevern, Newport, Pembrokeshire, SA42 0NY

Recommendation: Refuse

Summary

This application seeks consent to allow habitable rooms in an outbuilding which previously gained planning permission under application ref NP/22/0571/FUL, together with the erection of a link to the existing dwelling. The current application follows the refusal of application NP/24/0391/FUL, which also sought consent to allow habitable rooms in the previously consented building, and the construction of a link to the main dwelling.

It was considered by Officers that the proposal under NP/24/0391/FUL represented an over-development of the original dwelling by introducing additional accommodation and built form over and above that which was granted under application NP/22/057/FUL.

As part of this current submission, the proposed link to the dwelling has been reduced in terms of its scale by approximately 14m². Whilst officers acknowledge that this would reduce the proposed built form, it is still considered that the further additional built form would be an over-development of the existing dwelling, which already been extended extensively.

The recommendation is therefore to refuse planning permission.

This application is being presented to the Development Management Committee as the local Member has requested for it to be heard at the Committee. A site visit was undertaken on the 20th January 2025 by Members of the Committee.

The plans and consultee responses can all be found on the Citizen Portal by following this link: [Citizen Portal Planning - application details](#)

Consultee Response

- **Community Council:** No objection
- **PCC Drainage:** Conditional consent
- **PCC Highways Authority:** No objection
- **PCC Public Protection:** Conditional consent
- **Planning Ecologist:** No comments received at time of writing
- **Tree and Landscape Officer:** No comments received at time of writing

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 representations have been received.

Policies considered

National Policy

All planning applications in Wales need to be determined in accordance with the statutory National Development Plan:

- [Future Wales: The National Plan 2040](#) (FW)
- [Planning Policy Wales 12](#) (PPW12).

Technical Advice Notes

The Future Wales Plan should be seen and read as a whole, and in conjunction with National planning policy in the form of Planning Policy Wales (Edition 12, February 2024) as well as considering the following Welsh Government Technical Advice Notes (TAN's) www.gov.wales/technical-advice-notes:

- TAN 5 – Nature Conservation and Planning
- TAN 12 - Design
- TAN 15 – Development and Flood Risk

Local Development Plan 2 (Adopted September 2020)

Additionally, within the Pembrokeshire Coast National Park, The Local Development Plan 2 (LDP2) is also the relevant development plan with the following policies being applicable to this proposal.

- Policy 01 (National Park Purposes and Duty)
- Policy 07 (Countryside)
- Policy 08 (Special Qualities)
- Policy 11 (Nationally Protected Sites and Species)
- Policy 14 (Conservation of the Pembrokeshire Coast National Park)
- Policy 29 (Sustainable Design)
- Policy 30 (Amenity)
- Policy 32 (Surface Water Drainage)
- Policy 59 (Sustainable Transport)
- Policy 60 (Impacts of traffic)

These policies can be viewed on the Policies page of Pembrokeshire Coast National Park website: <https://www.pembrokeshirecoast.wales/wp-content/uploads/2024/01/LDP-Text-for-Adoption-Web.pdf>

LDP2 Supplementary Planning Guidance

In addition, the Authority produces Supplementary Planning Guidance (SPG) on various topics, and these may be material considerations in the determination of any future application made. In respect of the proposal the most relevant SPG's are:

- SPG – Biodiversity
- SPG – Sustainable Design and Development
- SPG - Landscape

Constraints

- Affordable Housing Submarkets
- Ancient Monument – within 500m
- Recreation Character Areas
- Seascape Character Areas
- Landscape Character Area
- LDP Mineral Safeguard

Relevant Planning History

- **NP/22/0571/FUL** – Demolition of existing agricultural buildings and extend residential curtilage to allow for extensions to host dwelling, new garage, stables / storage building – Approved
- **NP/18/0511/FUL** – Single storey extension to north-east elevation. Small extension to residential curtilage to northwest (retrospective) – Approved
- **NP/17/0353/NMA** - Non-material amendment to extension roof – Approved
- **NP/08/114** – Change of material to extension – Approved
- **NP/07/271** – Extension for disabled occupant – Approved
- **NP/199/94** – Alterations and extensions – Approved

1. Officer's Appraisal

Site and Proposed development

- 1.1 Lleine sits within a large plot, located on the northern flank of the minor coastal road which links Newport and Moylegrove. The property fronts the highway and has an access and driveway to the front, landscaped gardens to the side and rear, and pastureland beyond. The property is a traditional, detached single storey cottage with stepped extensions bookending the original form. The property has been extended on two occasions previously.
- 1.2 The site is located outside of any Centre or Rural Centre boundary and as such, is classed as being within the countryside for the purposes of the Pembrokeshire Coast National Park Local Development Plan 2. The proposal would be within the property's residential curtilage.
- 1.3 The site is located within Landscape Character Area 25, and Seascape Character Area 3 as defined by the LDP2.

Current Proposal

- 1.4 The proposal comprises:
 - The creation of habitable rooms within an outbuilding which gained permission under application NP/22/0571/FUL, together with the erection of a link to the host property.

- 1.5 The outbuilding which has received permission is proposed to be converted into habitable rooms, as a whole, the building and the link extension would provide one en-suite bedroom, one bedroom which would have shared access to a w/c (which would include a shower), utility room, hallway, studio, porch, with part of a proposed study being incorporated into the link extension. Internal alterations would take place within the host property to create a pantry, wardrobe and cloakroom. These internal alterations within the host property would not require the benefit of planning permission.

2. **Key Issues**

The application raises the following planning matters:

- 2.1 Policy and Principle of Development
- 2.2 Siting, Design, and Impact upon the Special Qualities of the National Park
- 2.3 Amenity and Privacy
- 2.4 Biodiversity, Protected Sites, Green Infrastructure & Landscaping
- 2.5 Access and Parking
- 2.6 Surface Water Drainage
- 2.7 Contaminated Land

2.1 **Policy and Principle of Development:**

- 2.1.1 Section 38 of *The Planning and Compulsory Purchase Act 2004* requires that in determining a planning application the determination must be in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the National Park comprises Future Wales - The National Plan 2040 (FW) and the Local Development Plan 2 (LDP2).
- 2.1.2 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) of FW states that Strategic and Local Development Plans must identify their rural communities, assess their needs, and set out policies to support them.
- 2.1.3 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...'*
- 2.1.4 The primary objective of PPW12 is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental, and cultural well-being of Wales, as required by the *Planning (Wales) Act 2015*, the *Well-being of Future Generations (Wales) Act 2015* and other key legislation and resultant duties such as the Socio-economic Duty.
- 2.1.5 A well-functioning planning system is fundamental for sustainable development and achieving sustainable places. PPW12 promotes action at all levels of the planning process which is conducive to maximising its contribution to the well-

being of Wales and its communities.

- 2.1.6 The site lies outside any centre boundaries as defined by the Local Development Plan 2 (LDP) and is therefore classed as Countryside where development must be strictly controlled. Policy 07 of the LDP is the strategic policy relating to development within the countryside and set out the types of development that are acceptable, in principle, in the countryside.
- 2.1.7 Extensions to existing properties are usually acceptable where they accord well with the design, form, and character of the host dwelling.
- 2.1.8 This proposal would involve the conversion of an extension to, an outbuilding which was granted under application NP/22/0571/FUL in order to provide additional residential accommodation. This extension would be in addition to the previously granted rear extension under application NP/22/0571/FUL. The accommodation would be used by the applicant's family when visiting Pembrokeshire.
- 2.1.9 Whilst this property is no longer part of a working farm, its agricultural character remains. The property has been significantly extended previously. The original cottage had a floor area of approximately 52m². Approximately 40.5m² was added under application ref NP/199/94, approximately 70.9m² was added under applications NP/07/066, NP/07/271 and NP/08/114, and approximately 62.98m² was granted under NP/22/0571/FUL. Whilst the most recent permission has not yet been implemented, the additions that have already taken place represent an increase of over 100% of the cottage's original floor area. It is considered that by adding further built form to serve a domestic use, to the property, the remaining agricultural character would be eroded and that this would represent an over-development of the dwelling due to out of character with the original scale and form of the domestic dwelling. By attaching the outbuilding to the cottage via the proposed extension, the development would not be viewed as subservient to the main dwelling, and a significant element of character would be lost.
- 2.1.10 As such, it is considered that harm would be caused to the character of this property, and in turn, to the special qualities of the National Park.
- 2.1.11 Conversions of appropriate buildings to a range of uses is also usually deemed acceptable, provided that the buildings meet the definition of "appropriate".
- 2.1.12 National planning guidance refers to buildings needing 'to be of a form, bulk and general design which are in keeping with their surroundings'. In this National Park, these are considered to be those that make a positive contribution to the character of the area through their intrinsic architectural merit or their setting in the landscape. Their interest and charm stems from an appreciation of the functional requirement of the building, their layout and proportions, the type of building materials used (including those constructed of stone, clom and slate), and their display of local building methods and skills. Conversion must not result in an unacceptable adverse effect upon the structure, form, character or setting of the building

2.1.13 In this case, the building proposed for conversion does not yet exist. In effect the applicant is relying on the fall back position granted under the previous permission. Should the consent be implemented, the building proposed for conversion would be an entirely new, modern storage shed and would therefore not meet the definition of an appropriate building for conversion.

2.1.14 The proposal would therefore be contrary to Policy 7.

2.1.15 Whilst the agent for the application has previously contended that it would be possible to convert the current milking parlour into residential accommodation, this is not the view of the Authority. The milking parlour would be considered agricultural in nature, and as such, would not be considered acceptable for conversion under Class E, Part 1, Schedule 2 of the General Permitted Development Order. Whilst the agent claims that this building has been used for domestic purposes, an application for a Certificate of Lawfulness application would be required to confirm that use. No such application has been received. Therefore, only limited weight can be given to this argument.

2.1.16 If the applicant were successful in terms of obtaining a certificate of lawfulness, and subsequently convert the existing milking parlour into residential accommodation, this would have less of an impact than the current proposal given that no additional floor space would be proposed. By converting the new outbuilding and extending it, and the host dwelling over and above what was given permission under NP/22/0571/FUL, an over-development of the site would occur.

2.1.17 Overall, the proposal would therefore be contrary to strategic Policy 7 (Countryside) of LDP2 due to the development not being subservient to the main dwelling, and the building in question would not be deemed as “appropriate” due to it being an entirely new building.

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

2.2.1 Policy 08 (Special Qualities), of 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 qualities are characteristics and features which individually or in combination contribute to making the National Park unique.

2.2.2 Policy 14 (Conservation of the Pembrokeshire Coast National Park) of 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.

2.2.3 Policy 29 (Sustainable Design) of LDP2 requires all development proposals to be well designed in terms of place and local distinctiveness.

- 2.2.4 The site lies within the Pen Afr to Pen y Bal Seascape Character Area, and Cemaes Head Landscape Character Area. This LCA is described as having 'dramatic sea cliffs forming the northern boundary of this large tract of rolling farmland at the northern extremity of the National Park. A gently rolling, predominantly farmland landscape, with fields enclosed by hedgebanks that, together with the scattered farmsteads, small woodland blocks and quarries contribute to the overall mosaic pattern'. The management guidance for this Landscape Character area is to: maintain the local vernacular of stone buildings to conserve the scale and rural character of villages, hamlets and farmsteads.
- 2.2.5 This site has undoubtedly seen significant changes since the original smallholding/ dwelling was constructed in the 1800s. However, the agricultural character of the property and the site in general remains. The existing outbuilding to the west of the property is to be demolished, and a new outbuilding to be constructed in its place. It is proposed that this outbuilding be converted into ancillary residential accommodation for the applicant's family.
- 2.2.6 As part of this proposal, it is intended to extend the previously approved outbuilding in order to link it to the extension which was granted for the existing cottage under NP/22/0571/FUL, with access between the main cottage and the proposed new accommodation being in the form of a study. The proposed accommodation could also be accessed via a door within the new porch.
- 2.2.7 The extension would be finished in corrugated metal cladding, and would have a corrugated metal roof. The use of materials would be deemed acceptable, however, the amount of glazing proposed on the north-western elevation as a result of the development would not be deemed as acceptable as this would further erode the agricultural character of the property, even with the removal of one window.
- 2.2.8 Additionally, since the cottage has previously been extended, the current proposal of extending the outbuilding, and essentially, the existing cottage, would cumulatively, result in the overdevelopment of the site and the cottage. This would mean that the scale of this property, which still retains its agricultural character, would not be preserved, and therefore, the development would not be in accordance with the LCA management guidance.
- 2.2.9 The application as proposed does not therefore meet the criteria as set out in Policy 29 (Sustainable Design) of LDP2; specifically: Place and local distinctiveness (see Policy 8).
- 2.2.10 It is acknowledged that a roof light is proposed on the rear elevation, which the agent contends will break up the line of development. However, this does not negate the concerns that the Authority has with the addition of further built form on this site, and therefore, does not overcome the principle objection to the scheme.
- 2.2.11 Having regard to the points raised above, the proposed development is considered to detract from the special qualities of the National Park in this location and would be detrimental to the quality and character of the landscape character area in which the site sits, and as such does not comply with Policies 8, 14, or 29 of LDP2, and cannot be supported.

2.3 Amenity and Privacy

- 2.3.1 Policy 30 (Amenity) of LDP2 seeks to protect the amenity of people living in the National Park and states that development will not be permitted where it has an unacceptable adverse effect on amenity, particularly where:
- a) the development would have a detrimental impact on the quality of the environment currently enjoyed by people living, working or visiting the Park; and/or
 - b) the development is of a scale incompatible with its surroundings; and/or
 - c) the development leads to an increase in traffic or noise or odour or light which has a significant adverse effect; and/or
 - d) the development is visually intrusive.
- 2.3.2 Policy 30 (Amenity) supports Policy 14 (Conservation of the Pembrokeshire Coast National Park) in not allowing development that creates a visual intrusion.
- 2.3.3 There are no concerns in terms of any impact upon residential amenity given that there are no nearby neighbouring properties.
- 2.3.4 There are however, concerns in terms of the proposal's compatibility with its surroundings. As previously discussed, it is considered that the conversion and extension of the outbuilding in question, and essentially adding built form to the previously granted extension, would be out of scale with the property and the site, as it would cause an over-development of the site.
- 2.3.5 In addition, it is considered that the proposed use of the outbuilding as residential accommodation would increase the level of light spill in comparison to its approved use as storage. Given the isolated location of the property, it is deemed that the additional light spill would cause harm in terms of visual amenity, particularly during the night.
- 2.3.6 As such, whilst there are no concerns as regards residential amenity, this would not outweigh the concerns in relation to the proposal being of a scale that is incompatible with its surrounding by virtue of over-development. Overall, the proposal is deemed to be contrary to Policy 30 of the LDP2

2.4 Biodiversity, Protected Sites, Green Infrastructure & Landscaping

- 2.4.1 PPW12, TAN5 and LDP2 Policy 11 (Nationally Protected Sites and Species) 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.
- 2.4.2 To comply with Planning Policy Wales 12 (2024) and the *Environment (Wales) Act 2016*, planning authorities are expected to ensure every development positively contributes to biodiversity.

- 2.4.3 Chapter 6 of Planning Policy Wales 12 states that green infrastructure plays a fundamental role in shaping places and our sense of well-being, and is intrinsic to the quality of the spaces we live, work and play in.
- 2.4.4 It also states that a green infrastructure statement should be submitted with all planning applications and that the green infrastructure statement will be an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question and must be used for demonstrating how the stepwise approach has been applied.
- 2.4.5 A green infrastructure statement has been received with the application demonstrating how the step-wise approach (Para 6.4.15 of PPw12) has been provided within this application. It is noted that two small sections of garden will be removed in order to facilitate the proposed development, and that a rainwater garden will be provided in terms of mitigation. In terms of enhancements to the green infrastructure already on the site, it is noted that additional Pembrokeshire hedging will be planted to the southwestern boundary. Whilst no details of the rainwater garden have been submitted, if the principle of the proposal were deemed acceptable, these details could be secured via a condition.
- 2.4.6 It is also proposed to install two bird boxes, and one bat tube as part of the proposal. This would be deemed acceptable.
- 2.4.7 Whilst the green infrastructure and biodiversity enhancements proposed on site would be deemed acceptable subject to a condition being imposed, this does not outweigh the concerns regarding the principle of the proposal as discussed in section 2.1 of this report.

2.5 Access and Parking

- 2.5.1 Policy 59 (Sustainable Transport) of LDP2 is a strategic policy that ensures opportunities are taken to improve and promote sustainable travel choices and reduce the need to travel by car by permitting proposals that assist in delivering improved traffic and parking management.
- 2.5.2 Additionally, Policy 60 (Impacts of traffic) of LDP2 permits development where appropriate access can be achieved.
- 2.5.3 The Highways Authority has been consulted on this proposal, and notes that the development would have no detrimental impact on the existing parking arrangements, access, or local Highway Network. The proposal would therefore be acceptable in terms of highway safety. However, it should be noted that this would not outweigh the principle objection to the proposal.

2.6 Surface Water Drainage:

- 2.6.1 Policy 32 (Surface Water Drainage) 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.

- 2.6.2 The drainage engineer has been consulted on this application and confirms that the proposed method of surface water disposal – a soakaway, is deemed acceptable. However, no detailed surface water drainage design has been submitted.
- 2.6.3 If the application were deemed acceptable, a condition could be imposed requiring results of percolation testing to be submitted to and approved in writing prior to the commencement of development.

2.7 Contaminated Land:

- 2.7.1 The pollution control team has been consulted on this application. Comments have been received in relation to the potential for accidental leaks / spills to have occurred from the previous uses of the buildings. As the proposal is for a residential use, which represent a highly vulnerable receptor, it is essential that appropriate mitigation measures are in place to ensure that there is no risk posed by potential contamination at the site.
- 2.7.2 In addition, the site has also been identified as being within a Radon Affected Area. The pollution control team has recommended that conditions be attached to any permission. However, as discussed in sections 2.1, 2.2 and 2.3 of this report, the principle of the proposal is not deemed to be acceptable.

3. Conclusion

- 3.1 Having regard to all matters raised, it is considered that the proposal is contrary to the provisions of Policies 1, 7, 8,14, 29 and 30 of the LDP2 by virtue of the proposal not being subservient to the main cottage, the conversion of an unsuitable building into living accommodation, and the over-development of the site in general, thus causing harm to the special qualities of the National Park.
- 3.2 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.

4 Recommendation

It is recommended that the application be **Refused**, for the following reasons:

- i. This proposal is contrary to the requirements of Policies 1 (National Park Purposes and Duty), 7 (Countryside), 8 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park), and 30 (Amenity) of the adopted Local Development Plan 2 (2020), as the proposed development would result in harm being caused to the special qualities of the National Park through the over-development of the application by introducing further residential development, and further built form to the host dwelling thus eroding the remaining agricultural character of the property and site in general.

- ii. The building to be converted is not deemed an appropriate building for conversion due it being an entirely new, modern storage shed. The proposal therefore fails to accord with the provisions of Policy 7(Countryside) of the Pembrokeshire Coast National Park Local Development Plan 2 (2020).