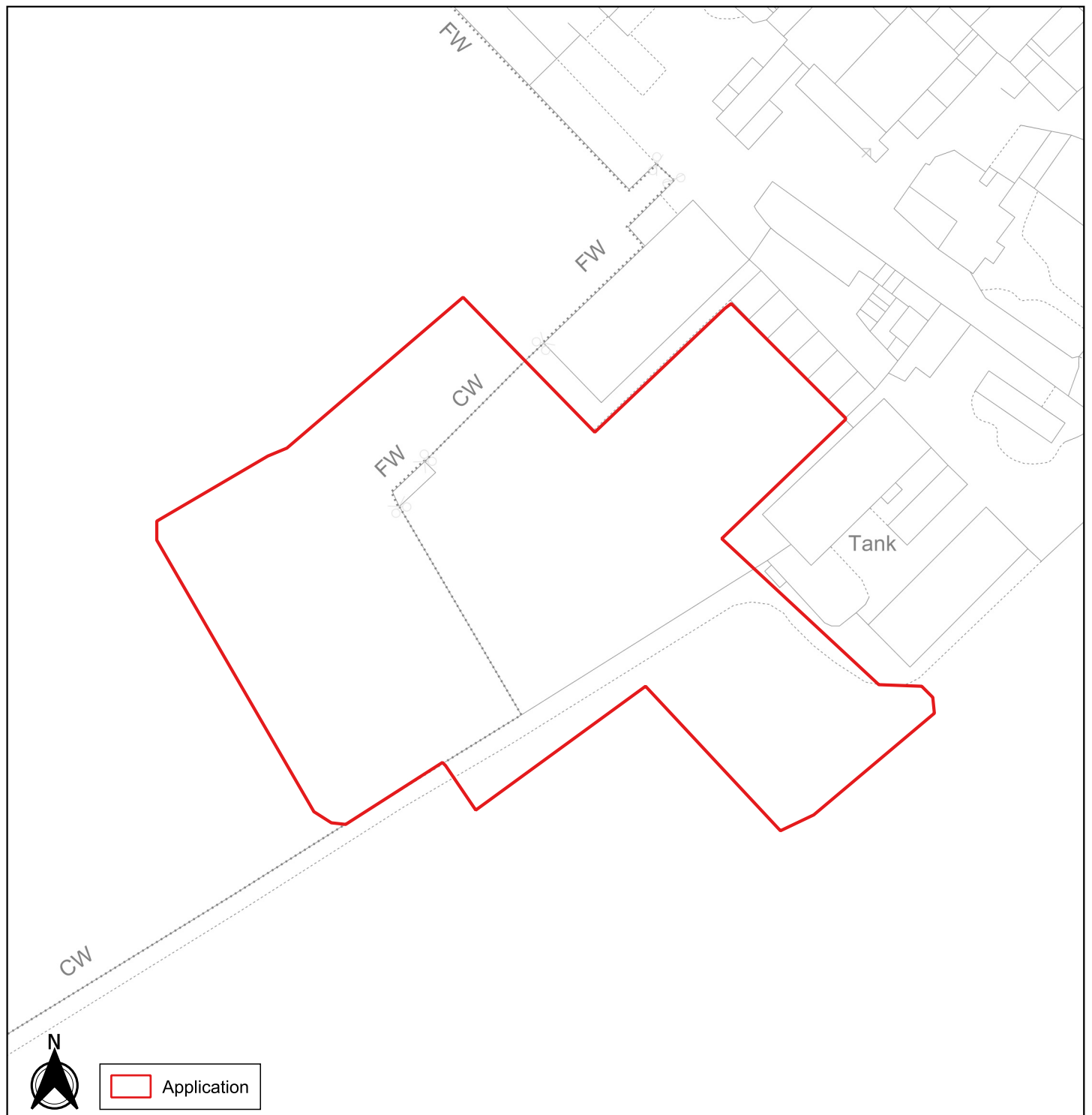


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PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY COMMITTEE REPORT



Ref No: NP/24/0521/FUL

Proposal: Erection of agricultural building for milking parlour & construction of collecting yard, feed pad, silage clamp, dirty water lagoon & associated works

Site Location: Long House, Trefin, Haverfordwest, Pembrokeshire, SA62 5AR

Recommendation: **Approve**, subject to conditions

This application is being presented to Development Management Committee in accordance with the scheme of delegation as the Director with responsibility for planning considers that it raises matters of public and/or member interest.

Application information is available here: [Citizen Portal Planning - application details](#)

Summary:

The application seeks full planning permission for the development of new agricultural infrastructure at Long House farm, to support the expansion and modernisation of existing dairy operations. The proposed works include the erection of a purpose-built milking parlour building, a concrete collecting yard, a feed pad, silage clamp, and a dirty water lagoon, all designed to improve animal welfare, operational efficiency, and environmental management on the site.

The application site is located within a rural area characterised by dispersed agricultural holdings and lies within the Pembrokeshire Coast National Park. The development is considered essential for the functioning of the farm enterprise and has been designed to minimise landscape impact through careful siting adjacent to existing farm buildings and the use of traditional agricultural materials.

Consultation responses from statutory consultees raised no objection subject to conditions relating to drainage, landscaping, and ecological protection measures. The scale and nature of the proposal are deemed appropriate for its location and are considered to support the continued viability of a traditional agricultural holding.

The proposal is considered to accord with the relevant policies of the Local Development Plan, including those relating to sustainable rural enterprise, landscape protection, and the conservation of the National Park.

Consultee Response

- Natural Resources Wales (NRW): no objection to the proposed development, subject to compliance with relevant guidance and regulations.
- PCNPA Planning Ecologist: No Objection
- CADW - Protection & Policy: No Objection
- Llanrhian Community Council: No Adverse comments but concerns about possible visual impact and lack of cover on slurry lagoon
- PCC - Drainage Engineers: No SAB application has been received to date
- Henneb: No objections after reviewing field survey and excavations

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*.

There have been several letters of concern received, and the points have been summarised below and addressed within the report:

- *Change in Farming Practice and Environmental Impact*
- *Protected Species and Biodiversity*
- *Ammonia and Nitrate Pollution, Cumulative Impacts*
- *Impact on Carreg Samson Burial Chamber and Footpaths*
- *Visual Impact and Landscape Character*
- *Lighting and Dark Skies*
- *Need for Further Consultation and Committee Determination*
- *Ammonia Emissions*
- *Dirty Water Lagoon Use*
- *Future Expansion*
- *Landscape Change of Use / Intensification*
- *Pollution from Slurry and Nutrient Management*
- *Climate Resilience*
- *Limited Landscape and Ecological Enhancement*
- *Use of Chemicals / Farming Practices*
- *Opportunity for Positive Change*

Policies considered

Development Plan

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

- [Future Wales: The National Plan 2040](#) (FW)

Local Development Plan 2 (Adopted September 2020)

Within the Pembrokeshire Coast National Park, The Local Development Plan 2 (LDP2) is also part of 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>

Planning Policy Wales (PPW12)

PPW12 sets out the land use planning policies of the Welsh Government.

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.

- [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 6 – Planning for Sustainable Rural Communities
- TAN 15 – Development and Flood Risk
- TAN 24 – Historic Environment

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 - Landscape
- SPG - Sustainable Design and Development
- SPG - Seascapes

Constraints

- Seascape Character Areas- *SCA 13- Penbwchdy to Penllechwen*
- Landscape Character Area – *LCA 20 Trefin*
- Ancient Monument - *within 500m- Carreg Sanson Burial Chamber, Ynys Y Castell, Castell Coch Promontory Fort*
- Hazardous Zones - *Airfield*
- Potential for surface water flooding
- Recreation Character Areas- *21 Small Bay Coast*
- Affordable Housing Submarkets
- Safeguarding Zone – *Airfield*

Relevant Planning History

- NP/25/0220/FUL- Construction of cattle underpass under minor county highway, new farm track, and associated works. undetermined at the time of this application
- NP/25/0338/FUL – Erection of portal framed agricultural building – approved 7th August 2025
- EC25/0044 - Concerns relating to works carried out outside the red line boundary of the current application site were referred to the Authority's Enforcement Section during

the course of the application. The Enforcement Officer investigated and determined that the works in question may constitute permitted development, or activities that do not require planning permission. The Welsh Government and Pembrokeshire County Council's Land Drainage Section were notified, and Welsh Government officers subsequently visited the site, confirming that there had been no breach of the Environmental Impact Assessment (Agriculture) (Wales) Regulations 2017. Had the works been located within a defined SSSI, consent from NRW may have been required; however, there are extensive permitted development rights for agricultural operations, and certain activities are not regarded as "development" under planning legislation. In the absence of a requirement for planning consent, no further action was taken.

1. Officer's Appraisal

The site is located in a rural setting to the east of the village of Trefin within open countryside and within the Pembrokeshire Coast National Park. The land is part of a working agricultural holding and comprises predominantly improved pasture fields. The proposed development site lies adjacent to the existing agricultural buildings associated with Long House.

The surrounding landscape is characterised by traditional field boundaries, gentle undulating topography, and sparse rural dwellings. The site is not within a designated conservation area, nor is it within proximity of listed buildings or scheduled monuments. Public rights of way and key viewpoints in the National Park have been considered in assessing visual impact.

The surrounding area consists of gently sloping agricultural land with views toward the coastline. The nearby Neolithic site of Carreg Samson is located east of the farm, near Abercastle.

Longhouse Farm is a traditional farmstead located approximately 0.5 miles north of the village of Trefin. The site comprises a historic stone-built longhouse and a group of associated agricultural outbuildings arranged around a central yard, all set within an established agricultural holding.

The principal dwelling is a part single, part two-storey traditional Welsh longhouse constructed of local rubble stone with a pitched slate roof. The longhouse retains characteristic architectural features including thick stone walls, gable-end chimney stacks, and a central cross-passage plan separating former domestic and agricultural spaces.

Adjacent to the main house are a number of connected and freestanding outbuildings, including:

- Traditional stone-built barns and stores forming an L-shaped range;
- A Dutch barn-style open-sided shelter constructed from reclaimed timber;
- A number of modern agricultural sheds of steel frame construction, used for equipment and general storage.

The site remains in mixed agricultural use and the buildings reflect a combination of historic and functional rural character. The group as a whole contributes to the vernacular farmstead character of the area.

There is currently an additional application running associated to this site that seeks permission for the construction of a cattle underpass under minor county highway, new farm track, and associated works. The farm has recently changed ownership and the farm currently establishing a 360 spring calving dairy herd with an additional 90 followers. The cattle have been on the farm for around 8 months plus. The dairy unit is not currently constructed. The herd will be grazed all year round, therefore giving the purpose of the current application. There is a need for the proposed development to allow livestock to move grazing blocks without crossing a public highway. Permission has been granted for one agricultural shed for storage (NP/25/0338/FUL) approved August 2025.

Site and Proposed development

1. The proposal comprises:
 - The application seeks full planning permission for the erection of an agricultural building to house a milking parlour, together with associated operational development including the construction of a collecting yard, feed pad, silage clamp, dirty water lagoon, slurry lagoon, and associated works.
 - The proposed building would accommodate a 50-point rotary milking parlour and associated plant room and offices. The structure measures approximately 43.8 metres in length by 28.8 metres in width, with a ridge height of 6.3 metres. The building is of modern agricultural design, constructed in steel portal frame with grey profiled steel sheeting to the roof and upper elevations, and concrete panels to the lower sections.
 - To the north of the parlour is a proposed silage clamp, feed pad and collecting yard, with the slurry lagoon and dirty water lagoon situated to the west. These elements are designed to support a proposed dairy herd of up to 450 cattle, including followers, and to allow for the effective management of slurry and feed in accordance with relevant agricultural and environmental regulations.
 - The proposed works also include landscaping along the southern and western edges of the site, comprising a native hedgebank and wildflower margin, intended to provide limited visual screening and biodiversity benefits.
 - The application is accompanied by a Planning Support Statement, nutrient management calculations, ammonia screening assessment, and supporting plans. The development is proposed to support a transition from mixed livestock to dairy farming on the holding.

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. Protected sites and Ammonia Emissions
- 2.8. Archaeology

2.1. Policy and Principle of Development:

2. 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).
3. 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...’.
4. The application site is located within open countryside, outside any defined Centre boundary as identified in the Pembrokeshire Coast Local Development Plan 2 (LDP2). The proposal relates to the erection of an agricultural building for use as a milking parlour, along with the construction of a collecting yard, feed pad, silage clamp, dirty water lagoon, and associated works. These elements are intended to serve the operational needs of an established dairy farming enterprise based at Long House.
5. The proposed infrastructure is essential for improving animal welfare, increasing operational efficiency, and ensuring compliance with modern environmental and welfare regulations, including appropriate slurry and nutrient management.
6. Planning Policy Wales (Edition 12) and TAN 6: Planning for Sustainable Rural Communities also provide a national policy framework that supports the principle of development necessary for the functioning and resilience of rural economies, including modernised farm infrastructure.
7. The Pembrokeshire Coast National Park Authority’s Local Development Plan (LDP2) provides specific policies to safeguard the natural beauty, wildlife, and cultural heritage of the National Park, while supporting sustainable rural economic activity, including agriculture. Policies encourage the modernisation and improvement of agricultural infrastructure where it can be accommodated without significant adverse impact. Policy 7 Countryside is of particular relevance to this application. It supports in principle new farm buildings where these are justified for agricultural purposes.
8. The proposed development forms part of a working farm business and is considered to be reasonably necessary for the purposes of agriculture. The works will allow the holding to modernise its milking operations and better manage livestock waste, contributing to environmental sustainability and rural economic resilience.
9. Accordingly, the principle of the built development as proposed is considered acceptable and consistent with both local and national planning policies, subject to a detailed assessment of siting, visual impact, access, amenity, and environmental considerations.

10. Concerns were raised that the proposal represents a significant intensification from sheep/arable farming to an intensive dairy operation, with associated environmental implications. Objectors also question whether potential future herd expansion should be considered now. It is important to note that the change of use of any land, including the buildings located thereon, for the purposes of agriculture or forestry, is not development at all by virtue of section 55(2)(e) of the Town and Country Planning Act 1990. This means that no planning permission is required to change the use of an agricultural holding from beef sheep or arable to dairy farming. The proposal currently before the Authority pertains solely to operational development, including the construction of the milking parlour, slurry lagoon, feed pad, collecting yard, and silage clamp. There are already cattle on site. The principle of agricultural buildings is supported where they are necessary for agricultural purposes on the holding. Any future related development would require a separate planning application.

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

11. 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.
12. 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.
13. Policy 29 (Sustainable Design) of LDP2 requires all development proposals to be well designed in terms of place and local distinctiveness.
14. Policy 1 (National Park Purposes and Duty), Policy 8 (Special Qualities), and Policy 14 (Conservation of the Pembrokeshire Coast National Park) of the Local Development Plan 2 (LDP2) require that development proposals conserve and enhance the natural beauty, wildlife, and cultural heritage of the National Park. Development should also be appropriately sited and designed to minimise visual intrusion and protect the Park's special qualities.
15. The proposed development is to be located immediately adjacent to the existing farm complex at Long House, thereby consolidating built form and avoiding unnecessary encroachment into open countryside. The positioning respects the existing functional layout of the farm, ensuring operational efficiency and avoiding fragmentation of land or infrastructure.
16. The site is located within the Trefin Landscape Character Area (LCA20) with the farmed landscape appearing to be in a constant state of management and condition. Management type and intensity varies across the area but is considered to be largely appropriate for the agricultural nature of the area. The site is also within the Penbwdy to Penllechwen Seascape character Area (SCA13) which notes open

pastoral landscape gently sloping to the coast with some medieval strip fields and low cut hedgebanks, as well as valleys with woodland and scrub on steep sides.

17. The scale and massing of the proposed milking parlour and associated infrastructure are typical of modern agricultural buildings. While utilitarian in nature, the design and form are consistent with their intended use. The proposed materials such as profiled metal sheeting for roofing and timber or concrete panel cladding are considered appropriate for rural development.
18. Concerns are raised about the visibility of the milking parlour and associated structures from nearby properties, public footpaths, and designated viewpoints, with potential adverse effects on landscape character. The proposed buildings are sited within the existing farm complex and have been designed to reflect typical modern agricultural structures. While some visibility is inevitable, the siting, scale, and appearance are considered appropriate within the context of the working rural landscape. The proposal is not considered to cause an unacceptable impact on the National Park's special qualities.
19. In conclusion, the siting and design of the proposed development are considered to be acceptable and in keeping with the existing agricultural context. Subject to appropriate conditions, the development is not considered to have an unacceptable impact on the special qualities of the Pembrokeshire Coast National Park, and complies with Policies 1, 8, 14, and 30 of the LDP2

2.3. Amenity and Privacy:

20. 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.Policy 30 (Amenity) supports Policy 14 (Conservation of the Pembrokeshire Coast National Park) in not allowing development that creates a visual intrusion.
21. The application site is situated within open countryside and is part of a working agricultural holding. The nearest unrelated residential property is located at a considerable distance from the site, and there is sufficient separation and screening to ensure that there would be no material overlooking or loss of privacy.
22. Given the nature of the development including the operation of a milking parlour, collecting yard, feed pad, silage clamp, and dirty water lagoon it is recognised that some degree of noise and odour is associated with standard farm practices and there may be some additional traffic movements associated with the collection of milk. However, these elements are integral to the existing dairy unit and represent an

intensification and modernisation of existing operations, rather than a wholly new activity. The proposed improvements are likely to result in better management of livestock and waste, potentially reducing odour and environmental impact compared with more outdated systems.

23. The dirty water lagoon and silage clamp have been sited to the rear of the existing farm buildings and at a sufficient distance from any sensitive receptors to avoid undue nuisance. The design of these elements, including containment measures and compliance with pollution control requirements (regulated by Natural Resources Wales), will help to limit the potential for environmental harm or amenity loss.
24. No objections have been raised by environmental protection officers or statutory consultees in relation to noise, odour, or pollution.
25. Concerns have been expressed by some third parties regarding lighting included potential light spill from rooflights affecting dark skies and nocturnal species. No external lighting is proposed. Internal light spill from rooflights is expected to be limited and intermittent, linked to operational hours. A condition is imposed to control lighting, and an informative will advise that any future lighting must comply with Policy 9 (Light Pollution) of LDP2 and the Authority's Dark Skies guidance.
26. In light of the rural context, the operational needs of the farm, and the absence of sensitive residential receptors in close proximity, it is considered that the proposal will not result in any unacceptable impact on residential amenity or privacy. The development therefore complies with the relevant criteria of Policy 30 of LDP2

2.4. Biodiversity, Protected Sites, Green Infrastructure & Landscaping

27. 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.
28. 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.
29. 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.
30. 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.
31. The site lies approximately 0.475 km from the West Wales Marine Special Area of Conservation (SAC), designated for the protection of harbour porpoise (*Phocoena phocoena*). As a competent authority under the Conservation of Habitats and Species

Regulations 2017 (as amended), the Local Planning Authority must consider the potential for likely significant effects on designated sites.

32. In this case, it is considered that the development will not be likely to have any significant effect on the qualifying features of the SAC. The harbour porpoise is a mobile species that tends to feed offshore in tidal areas and does not exhibit site fidelity to inshore habitats near the development site.
33. There is no direct or indirect hydrological connection between the development and the SAC. Potential impacts such as turbidity, nutrient transfer, sedimentation, noise, or visual disturbance are not considered likely given the scale and distance of the proposal from the marine environment.
34. Furthermore, as set out further below, ammonia emissions from the development were assessed via a SCAIL model and found to be well below the relevant critical level thresholds (1–3 µg/m³). The cattle are existing on site, and the development relates to infrastructure improvements (milking parlour, lagoon) to handle waste more effectively. In accordance with NRW guidance, the development can proceed where no additional significant ammonia sources are introduced.
35. As such, the development is not considered likely to have a significant effect on the SAC or other protected habitats and no adverse effects on site integrity are anticipated.
36. With regard to the nearby Site of Scientific Interest, the Wildlife and Countryside Act 1981, as amended by the Countryside and Rights of Way Act 2000, places a duty on all public bodies, including planning authorities, to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features by reason of which a SSSI is of special interest. No adverse effects are anticipated from the development on the SSSI.
37. Concerns have been expressed by some third-parties about the lack of surveys for bats, badgers, choughs, whimbrel, and possible harm from anti-parasitic treatments. The level of hedgebank planting was welcomed but considered minimal, with calls for wider ecological enhancements and protection of nearby wetland habitats. NRW and the Authority's Ecologist did not request further ecological surveys, noting the site is not within or adjacent to a designated biodiversity site and that existing buildings are not being demolished or altered. The hedgebank planting and wildflower margin are considered positive, albeit modest, enhancements. Broader land management practices, use of agrochemicals, and farming methods are outside planning control. Wildlife legislation applies should protected species be encountered during works.

2.5. Access and Parking

38. 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.
39. Additionally, Policy 60 (Impacts of traffic) of LDP2 permits development where appropriate access can be achieved.

40. The application proposes the continued use and improvement of the existing farm access from the local road network. The current access arrangements appear adequate to accommodate the expected vehicle movements associated with the proposed milking parlour and associated operations, including milk tankers, farm machinery, feed delivery vehicles, and livestock transport.
41. No formal car parking area is shown on the submitted plans. Given the rural agricultural nature of the development and the relatively low number of staff likely to be employed on site, this is not considered to be a significant issue. Vehicles associated with the farm are expected to be parked within the farmyard or existing farm buildings.

2.6. Surface Water Drainage:

42. 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.
43. The proposed development includes significant operational infrastructure associated with intensive dairy farming, including a new milking parlour, feed pad, silage clamp, slurry lagoon, and dirty water lagoon. These elements introduce new impervious surfaces with the potential to alter the current surface water drainage regime on site.
44. The applicant has submitted a site plan indicating that clean surface water (e.g. roof water) will be separated from dirty water and directed away from slurry storage areas. Dirty water generated from wash-down areas, the parlour, and the collecting yard is proposed to be directed into the dirty water lagoon, in accordance with the Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021. The lagoon will be constructed to meet the standards under the CoAPR and will require notification to Natural Resources Wales (NRW) at least 14 days prior to construction.
45. NRW has reviewed the submitted drainage information and confirmed in their consultation response dated 30 May 2025 that they have no objection to the scheme as submitted. They welcomed the submission of the detailed site plan showing appropriate separation of clean and dirty water flows and confirmed that the proposal satisfies their previous requests for drainage clarification.
46. There are no significant watercourses in the immediate vicinity of the proposed development, and the design of the dirty water and slurry lagoons is intended to mitigate any risk of runoff or pollution. The development is not located within a designated flood risk zone.
47. Subject to implementation in accordance with submitted details and continued compliance with CoAPR requirements, the surface water drainage strategy is considered acceptable.
48. The proposed development includes a large new milking parlour and associated infrastructure which will increase the area of hard surfacing on the site. The planning application states that dirty water runoff from the parlour and yard will be directed to a purpose-built dirty water lagoon, and this is reflected in the submitted site layout plan.

However, the Civil Engineering Section has noted that no detailed surface water drainage design has been provided, and no SuDS Approving Body (SAB) application has been submitted to date.

49. Given that the construction area exceeds 100 square metres and involves new areas of hardstanding, the development will require SAB approval under Schedule 3 of the Flood and Water Management Act 2010, prior to the commencement of any works on site. This requirement has been highlighted to the applicant by way of an informative.
50. While there is no indication that surface water will be discharged into any watercourse, the Civil Engineering Section has advised that, should any ordinary watercourse be present, no culverting or alteration to flow is permitted without prior written consent under Section 23 of the Land Drainage Act 1991, as amended. Furthermore, no structures are permitted within 3 metres of the top of any bank or culvert without prior agreement from the Local Land Drainage Authority.
51. As SAB approval has not yet been gained, a condition will require details of surface water drainage to be provided prior to development commencing.

3.7 Protected sites and Ammonia Emissions

52. The development involves an increase in livestock numbers, with potential for increased ammonia emissions. A SCAIL assessment was submitted and NRW accepted its conclusions.
 - Pollution of Controlled Waters: NRW highlighted requirements under The Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021 (CoAPR), particularly in relation to slurry storage and silage facilities.
 - Dirty Water Lagoon: Must be constructed to CoAPR standards. The applicant must notify NRW 14 days prior to construction.
 - Milking Parlour & Collecting Yard: A revised site drainage plan was submitted (Agri Angels, dated 29/05/2025), which addresses previous concerns. No further objection is raised.
 - Silage Store: No objection is raised, provided it is designed and constructed by a suitably qualified engineer in accordance with CoAPR requirements.
53. Third-party concerns have been raised about ammonia and nitrate pollution, cumulative impacts on nearby SSSIs, and slurry management. Some objectors questioned the accuracy of slurry volume calculations, risk of lagoon overtopping, and absence of a lagoon cover.
54. A SCAIL ammonia assessment was undertaken and reviewed by NRW, showing predicted levels well below critical thresholds for designated sites. NRW raised no objection and did not require additional ammonia mitigation. The slurry lagoon design meets current standards. Contents are classed as slurry and subject to the Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021, including seasonal spreading restrictions, which are enforced by NRW. Rainfall and storage capacity have been calculated using accepted methodologies.

3.8 Archaeology

55. Planning Policy Wales notes that the conservation of archaeological remains and their settings is a material consideration in determining planning applications.
56. An archaeological evaluation was undertaken on the application site, consisting of the excavation of six trenches across the site. The investigation employed mechanical excavation followed by hand excavation to identify any archaeological features or artefacts.
57. The results indicate no archaeologically significant contexts or features were present, and no artefacts predating the 19th century were recovered. Some evidence of modern disturbance was noted within the northeastern part of one trench, but this does not impact the overall archaeological potential of the site.
58. Although the site lies close to known heritage assets such as the Carreg Samson chambered tomb and areas of potential prehistoric interest identified via aerial reconnaissance, the evaluation confirms the application site itself does not contain any significant archaeological remains.
59. The report and associated records will be archived with the National Monuments Record and the Historic Environment Record.
60. In light of these findings, the proposed development is considered unlikely to have any adverse archaeological impacts, and no further archaeological mitigation or conditions are recommended.
61. Third-party concerns were raised regarding potential impacts on the setting of Carreg Samson Burial Chamber and the risk of erosion from cattle grazing.
62. The site lies approximately 280 m from Carreg Samson, a Scheduled Monument. The proposal is sited within the established farm complex and screened by topography and existing buildings, limiting visual intrusion. Cadw, as the statutory consultee, raised no objection. Visitor safety and cattle management are farm management matters outside planning control.

3. Conclusion

63. The proposal represents an appropriate form of agricultural development that supports the long-term viability of a rural farm business. The siting, scale and design are considered acceptable and not harmful to the special qualities of the Pembrokeshire Coast National Park. Subject to conditions, the development complies with relevant local and national policies.
64. 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

APPROVE, subject to the following conditions:

1. The development shall begin no 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:
 - Block Plan received 30/5/25
 - Archaeological Evaluation received 01/04/2025
 - Ammonia Screening Assessment using SCAIL model received 02/04/2025
 - Cross Section Plans A-B and C-D received 29/10/2024
 - Floor Plan and Cross Section of Lagoon received 29/10/2024
 - Silage Clamp Block Plan and Cross Section received 29/10/2024
 - Location Plan
 - Planning Support Statement**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. Notwithstanding that there may be existing lighting, this has not been shown on the plans and is not authorised by this permission. Any external lighting shall first be agreed in writing through the submission of a scheme to the Local Planning Authority.
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 Policies 9 and 11 of the Pembrokeshire Coast National Park Local Development Plan (LDP2).
4. The approved landscaping works shall be carried out in accordance with the approved details (***Site Plan dated 28/10/2024*** and ***Planning Support Statement dated 11th September 2024***) during the first planting season immediately following agreement of the landscaping scheme and the agreed implementation program. The completed scheme shall be managed and/or maintained in accordance with an approved scheme of management and/or maintenance.
Reason: In the interest of protecting visual amenity and the special qualities of the area. 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), 14 (Conservation of the Pembrokeshire Coast National Park) and 30 (Amenity).
5. The wildflower seed mix for the proposed embankment will comprise only suitable native species as specified in Appendix 6 of the PCNPA Biodiversity SPG.
Reason: In the interest of protecting visual amenity and the special qualities of the area. 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), 14 (Conservation of the Pembrokeshire Coast National Park) and 30 (Amenity).

6. No development shall commence until details of a scheme for the disposal of surface water has been submitted to and agreed in writing by the local planning authority. The scheme shall be implemented in accordance with the approved details prior to the use of the development and retained for the lifetime of the development.

Reason: To ensure an appropriate means of disposal for surface water. Policy: Local Development Plan 2 – Policy 32 (Surface Water Drainage).

5. Informatives

SuDs

Pembrokeshire County Council as SuDS Approving Body (SAB) considers that by virtue of the fact that the construction area having drainage implications appears to be in excess of 100 square metres the proposed works will require SAB approval prior to the commencement of any works on site relating to this application.

Please see www.pembrokeshire.gov.uk/planning-contacts/sustainable-drainage-approving-bodysab for more information.

If a watercourse is present on site

Due to the existence of an ordinary watercourse, the applicant should be made aware that ordinary watercourses must not be filled in, culverted, or the flow impeded in any manner, without the prior written consent of Pembrokeshire County Council under Section 23 Land Drainage Act 1991 as amended by the Flood and Water Management Act 2010.

Consent is also required to alter a culvert in a manner that would be likely to affect flow of an ordinary watercourse, and for temporary as well as permanent works.

The applicant can obtain further details from Mr Neville Davies -

ldconsent@pembrokeshire.gov.uk

Under no circumstances should any structure be built over ordinary watercourses or within a minimum of 3 metres measured each side from the top of bank of any watercourse, or within a minimum of 3 metres measured each side from the outer face of a culvert, without the prior written agreement of the local land drainage authority. This will ensure that access is maintained for future maintenance.

Wildflower mix

Suitable wildflower mixes and species selection for can be found in Appendix 6 of the PCNPA Supplementary planning guidance on biodiversity can be found via:

[Post-Cons-Bio-SPG-Eng-1.pdf](#)