

Parc Cenedlaethol Arfordir Penfro

Pembrokeshire Coast National Park



Pembrokeshire Coast National Park Local Development Plan 2

Conversions in the Countryside

Supplementary Planning Guidance **Draft**

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Adoption **XXX**

This item is also available in Welsh/ Mae'r eitem hon ar gael yn Gymraeg hefyd

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Introduction

1. In September 2020 the Pembrokeshire Coast National Park Local Development Plan 2 (end date 2031) was adopted by Pembrokeshire Coast National Park Authority.
2. While only the policies in the adopted development plans have special status in deciding planning applications, (i.e. for the purpose of any determination under the Planning Acts, the determination must be made in accordance with the relevant Plan unless material considerations indicate otherwise), Supplementary Planning Guidance can be taken into account as a material planning consideration provided it is derived from and is consistent with the adopted development plan and has itself been the subject of consultation, which will carry more weight.
3. This Supplementary Planning Guidance provides detailed information regarding the way in which Development Plan policies will be applied to planning applications for the conversion of buildings. The Supplementary Planning Guidance has been drafted to ensure it dovetails with the National Park Authority's Supplementary Planning Guidance documents on Sustainable Design and Development, Landscape and Seascape Character, and Affordable Housing, Biodiversity.¹

The Status of Supplementary Planning Guidance

4. Supplementary Planning Guidance (SPG) may be a material planning consideration during the process of assessing and determining planning applications. Welsh Government and the Planning and Environment Decisions Wales (PEDW) will place considerable weight on supplementary planning guidance that stem from, and are consistent with, a development plan. SPG does not introduce any new planning policies.
5. In accordance with Welsh Government advice, the SPG will be subject of a public consultation and a resolution to adopt by the National Park Authority.

¹ <https://www.pembrokeshirecoast.wales/planning/planning-policy/local-development-plan-2/supplementary-planning-guidance-ldp2/>

The Policy Context

Future Wales 2040

6. Under planning legislation, the planning policies for every area are contained within the 'development plan'. Future Wales 2040 sets out a spatial strategy *which 'by focusing large scale growth on the urban areas, development pressures can be channelled away from the countryside.'*²

Planning Policy Wales Edition 12 February 2024

7. *'3.60 Development in the countryside should be located within and adjoining those settlements where it can best be accommodated in terms of infrastructure, access, habitat and landscape conservation. ... However, new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should be of a scale and design that respects the character of the surrounding area.'*
8. *'5.6.8 ... They (planning authorities) should also adopt a positive approach to the conversion of rural buildings for business re-use.'*

Technical Advice Note 23 Economic Development February 2014

9. *'3.2.1 The re-use and adaptation of existing rural buildings has an important role in meeting the needs of rural areas for commercial and industrial development, and tourism, sport and recreation. In recognising this, local planning authorities are expected to adopt a positive approach to the conversion of rural buildings for business re-use, especially those buildings located within or adjoining farm building complexes..'*

Pembrokeshire Coast National Park Local Development Plan 2 September 2020

10. The Pembrokeshire Coast National Park Local Development Plan 2 was adopted in September 2020. The spatial strategy of the Local Development Plan 2 channels development towards towns and villages.
11. **Policy 7 (Countryside)** of the Local Development Plan 2 strictly controls development in the countryside. Policy 7c) does however allow for the **conversion of appropriate buildings** to a range of uses with market housing being given priority in residential conversions.

² Page 64, second paragraph. Future Wales The National Plan 2040
<https://www.gov.wales/sites/default/files/publications/2021-02/future-wales-the-national-plan-2040.pdf>

12. Paragraph 3.2.2 of Technical Advice Note 23, Economic Development February 2014 provides for the option of prioritising employment-related uses in conversions. This Authority has attempted to prioritise employment-related uses under the Joint Unitary Development Plan and found this difficult to operate. Beyond holiday letting there is little demand for employment related activities.
13. The role of this guidance is to ensure that such proposals are subject to careful consideration to ensure that they comply with the policies of the Local Development Plan 2.
14. The **conversion of outbuildings** in the countryside more recently has had particular focus in terms of applications seeking to introduce significant change to the original building undermining the character of the building, which is the reason its retention is sought in the first place. Policy 7 c) (Countryside) allows for the conversion of appropriate buildings. Paragraph 4.43 to 4.47 of the Local Development Plan 2 describes in detail what the expectations are. Policy 14 (Conservation and enhancement of the Pembrokeshire Coast National Park) focuses on the protection of the National Park qualities, its special landscape character including the need to protect against losing or failing to incorporate important traditional features.
15. The following guidance has been split into three sub-sections:
- **Section A: Key Questions:** Fundamental matters that need to be addressed to secure a successful planning proposal.
 - **Section B: General Matters:** Proposals for the conversion of rural buildings to alternative uses will also need to satisfy the other relevant Local Development Plan 2 policies such as those relating to access arrangements and parking provision, impacts on neighbouring amenity, effects on protected habitats or species, and so on.
 - **Section C: Useful Contacts**

Section A Key Questions

- A.1 Below are key questions to consider in relation to proposals for the conversion of buildings in the countryside. Further detail guidance is then provided in relation to these key questions.
- A.2 It should be noted that actions under individual questions will have knock on implications for responding to other questions when developing proposals. A comprehensive approach to proposals is required.

What use is the building going to be converted to?

Why is the planning authority asking this question?	National Policy Reference	Local Planning Policy Reference
Local Development Plan policy prescribes the types of uses that buildings can be converted to. It also has a specific objective regarding prioritising the re-use of buildings for uses which contribute most to sustaining local communities. Adapting a building for a specific use for which it is not suitable can have a detrimental impact on the character of the building, and its contribution to the character of the local area.	Technical Advice Note 23: 3.2.1 Bullet 6: <i>conversion does not result in unacceptable impacts upon the structure, form, character or setting where the building is of historic and / or architectural interest.</i> 3.2.3: <i>If the existing building is unsuitable for conversion without extensive alteration, rebuilding or extension, or if the creation of a residential curtilage would have a harmful effect on the character of the countryside, the same considerations relating to new house building in the open countryside will apply.</i>	Policy 7 (Countryside) c) requires it constitutes the conversion of appropriate buildings to a range of uses with market housing being given priority in residential conversions. Policy 14 (Conservation and enhancement of the Pembrokeshire Coast National Park) focuses on the protection of the National Park qualities, its special landscape character including the need to protect against losing or failing to incorporate important traditional features.

Notes: The policy aims to encourage reuse of buildings for employment and employment related activities (such as farm shops, tourism attractions, serviced accommodation and recreational activities. Employment-related uses could include residential conversion as a subordinate part of a scheme). Residential use would include market housing (full-time residential with no occupancy controls) and self-catering. In residential proposals market housing will be given priority over self-catering to assist with the delivery of housing to meet local needs as per Policy 40 (Affordable Housing).

The strategy of Local Development Plan 2 is to prioritise the delivery of affordable housing in residential proposals. Policy 40 (Self-Catering Development), paragraph 4.20 also advises that given the large number of holiday properties currently in the National Park the Authority will seek to prioritise the provision of affordable housing over self-catering. Off-site affordable housing contributions will be sought on market dwellings. Please also see Section B: General Matters Use Classes Order Amendment 2022.

See also Question: Is the building suitable for the use? For example, residential conversions can often have detrimental effects on the fabric and character of traditional historic buildings because such buildings are often unsuitable for conversion to residential use without extensive alteration, re-building and/or extension.

A.3 If the building is only suitable for holiday let occupancy then appropriate planning controls need to be put in place to ensure it is occupied in accordance with the condition. Where planning permission for holiday accommodation is granted this will be subject to conditions and/or a legal agreement to restrict the occupation of the building to holiday use preventing all year round occupancy by the same occupant.

Is the building capable of conversion?

Why is the planning authority asking this question?	National Policy Reference	Local Planning Policy Reference
National Planning Policy requires this in countryside locations where development is strictly controlled. Only buildings that can be reused without significant alteration should be considered for conversion.	Technical Advice Note 23 Economic Development paragraph 3.2.1: <i>...if the buildings are in the open countryside, they are capable of conversion without major or complete reconstruction;</i> 3.2.3: If the existing building is unsuitable for conversion without extensive alteration, rebuilding or extension, or if the creation of a residential curtilage would have a harmful effect on the character of the countryside, the same considerations relating to new house building in the open countryside will apply.	Policy 7 (Countryside) <i>'Outside the identified Centres is countryside where development must be strictly controlled.'</i> ... Policy 7c) <i>'it constitutes the conversion of appropriate buildings to a range of uses...'</i>

Notes: Buildings requiring major or complete reconstruction or alteration will be refused planning permission as this would be contrary to national planning policy. *..'new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled.'* Paragraph 3.60 Planning Policy Wales Edition 12 February 2024.

See paragraph below on 'Structure.' See paragraph 'Extensions' below.

Structure - Structural Report

- A.4 Any building in the countryside proposed for conversion should be a permanent building of sound construction. Developments that entail significant re-building work will not be permitted as this would be tantamount to constructing a new building. Exceptions may include Listed Buildings or buildings within Conservation Areas where the **presumption** is to retain them in good repair and use. The walls should be structurally sound and should be eaves level in height. Any building in the countryside that is in such a dilapidated condition where substantial parts of it would have to be replaced, or that the building would have to be completely replaced, will not be acceptable. This will ensure that the special character and appearance of the building will not be damaged.

- A.5 Any application for conversion to residential should include a 'Structural Report' to prove that it is possible to convert the building without major or complete reconstruction. It will be necessary to ensure that the report is undertaken by a qualified person, such as a Structural Engineer. The information submitted should be in the form of a report. Where appropriate, the use of drawings and photographs are encouraged to show the building's condition.
- A.6 As the condition of buildings left unused can change significantly over time, it will be necessary to ensure that the Structural Report is undertaken within a period of 3 months of the planning application submission date.
- A.7 Any Structural Report should be comprehensive and thorough and include information about the condition of the building and its suitability for the proposed use. Considerations might include the overall size and layout of the building, the amount and disposition of openings, and the relationship with any adjacent buildings. A report that is only based on a visual inspection of the building will not be acceptable.
- A.8 During the construction work it will be necessary to ensure that appropriate measures are taken to safeguard/support the building's structure. A condition will be attached to the permission stating the need for the work necessary to support the structure of the building to be undertaken prior to undertaking any structural work.
- A.9 In instances where the building that is the subject of conversion falls down during the process of restoration, the work of converting the building should end until discussions take place with the National Park Authority. The fact that sections of the building have fallen may mean that the original planning permission given is no longer valid. In such circumstances, a new planning application will need to be submitted, and it may be that the proposal does not comply with the principle of the relevant policies within Local Development Plan 2. When undertaking restoration work, if sections of the original building are found to be structurally unsound and will therefore prevent the restoration work, then it should be ensured that a discussion takes place with the National Park Authority. Sections should not intentionally be demolished and then rebuilt without firstly receiving the permission to undertake the work. If sections were to be demolished without permission this would invalidate any prior consent.

Is the building suitable for the specific use?

Why is the planning authority asking this question?	National Policy Reference	Local Planning Policy Reference
One of the benefits of allowing the conversion of rural buildings to alternative uses is to ensure the survival of traditional rural buildings which add to the character and charm of the rural landscape. Therefore, in such cases, it is necessary to ensure that alternative uses require a minimum of changes to the fabric of the building and its setting in order to retain its character and visual amenity in the rural landscape. National Policy requires that buildings are capable of conversion without significant reconstruction. National Policy also requires conversion to not result in unacceptable impacts upon the structure, form, character or setting where the building is of historic and / or architectural interest.	Technical Advice Note 23 Economic Development paragraph 3.2.1: <i>'... if the buildings are in the open countryside, they are capable of conversion without major or complete reconstruction; conversion does not result in unacceptable impacts upon the structure, form, character or setting where the building is of historic and / or architectural interest.'</i> Technical Advice Note (TAN) 12 Design (2016) emphasises the value of good design in all developments, and provides advice and information on the design process. In respect of the conversion of rural buildings, TAN 12 5.8.4 highlights the importance of their sensitive treatment so to ensure that the character of such buildings and surroundings is maintained: <i>"Character retention will often involve the least amount of change possible to external appearance. Solidity and simplicity in design and relationship of built form with landscape provide the distinctive character of many Welsh rural areas."</i>	4.45 Conversion must not result in an unacceptable adverse effect upon the structure, form, character or setting of the building.

Notes: Buildings of insufficient size to accommodate an acceptable alternative use without significant extension alteration or extension would not be suitable for the specific use.

- A.10 Activities relating to low-key uses such as offices, studios, light industrial workshops or similar are likely to be most suitable if they can operate without creating high levels of noise, pollution or vehicle movements.
- A.11 There is little doubt that conversion for residential purposes remains the most popular option for the re-use of traditional rural buildings. However, it is also the most difficult and challenging - as well as potentially the most harmful. This is due to the inherent need to adapt the physical fabric of the building to provide habitable accommodation through internal subdivisions, the creation of upper-floors, attendant openings in walls for windows and doors and the need for domestic flues and other pipe work.
- A.12 Externally, the setting of the building can also be compromised by the addition of domestic/urban paraphernalia. Domestic landscaping, garden sheds, greenhouses, patios and boundary treatments can all jeopardise the character of a building and undermine its rural setting.
- A.13 The conversion of traditional rural buildings is guided on the one hand by the original structure and materials of the building and on the other the requirements and adaptation needs for an altered use. There is a balance to be struck between facilitating the practical requirements of a new use and maintaining the special character of the building. Reconciling the two in a mutually acceptable way can be a difficult challenge and require a combination of thoughtful design and in some cases innovative solutions.
- A.14 Simplicity in approach should be combined with quality design in order to ensure that the key and defining characteristics of the building are retained. Rural farm buildings are generally characterised by key features such as:
- uncluttered exteriors with blank walls;
 - roofs with unbroken lines and few (if any) openings;
 - a robust build with simple joinery;
 - the original fabric of the walls, floors and roof structure;
 - original window frames, doors and shutters (although there may be other fittings of interest too - both inside and out);
 - un-partitioned interiors and exposed structural elements; and
 - hard-surfaced open yards and open-field surroundings
- A.15 A sensitive scheme of conversion is more likely to be achieved if the following general principles are considered as part of the design process:
- Respecting the basic shape and design of the original building.

- Making as few alterations as possible to external walls.
- Maintaining the character of the roof by limiting the number of alterations and projections
- Incorporating purpose made timber joinery into openings.
- Retaining farmyard areas as single open spaces.
- Integrating boundary treatments, car parking, access and services into the proposal as a whole.
- Using adjacent outbuildings for uses associated with the conversion for example storage, garaging etc.
- Minimising the amount of clutter within garden areas.
- Retaining existing mature trees and vegetation where possible.
- Letting the existing building dictate the nature of the conversion.
- Designing simple internal layouts around existing features.

A.16 Conversely, insensitive and inappropriate conversions are often characterised by the following:

- Poor quality or overly large extensions to the existing building.
- Inserting too many new window/door openings into elevations.
- Changing the shape of original openings and regularising the window pattern.
- Inappropriate alterations to the roof.
- Introducing porches, conservatories and other alien features.
- Removing mature vegetation.
- Increasing and domesticating the curtilage area of the building.
- Incorporating visually prominent parking layouts with extensive areas of tarmac or paving.
- Over-intensifying the use of the available interior space.
- Poorly positioned utility installations.
- Light spill above the horizontal causing harm to the natural environment.

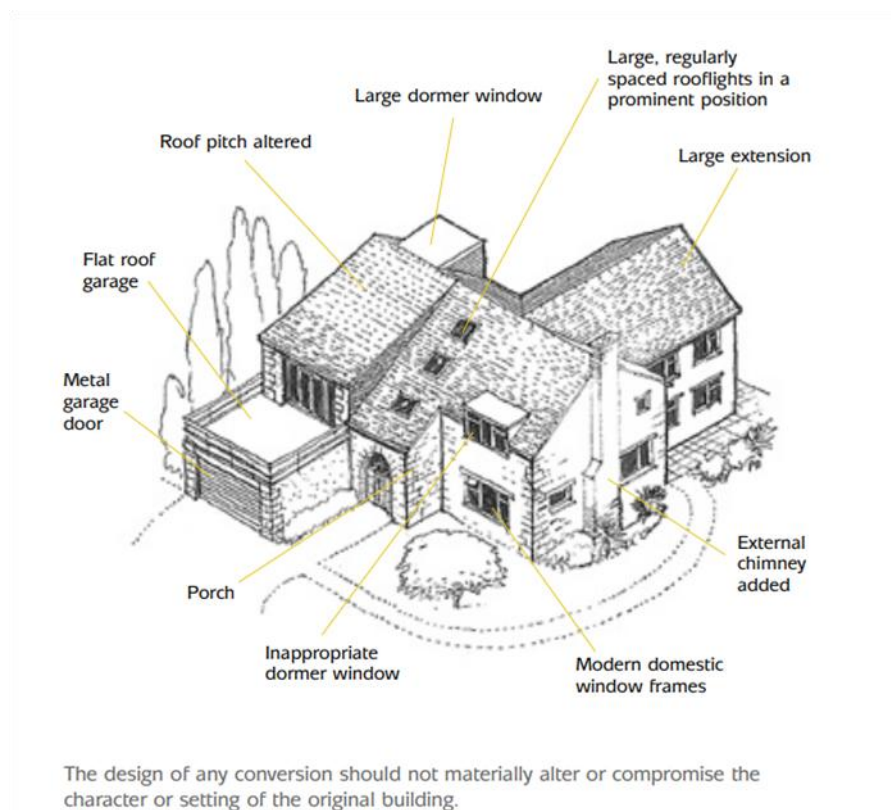


Diagram showing inappropriate features listed above

Openings

- A.17 Rural buildings are often characterised with windows which are often small, often shattered or louvred rather than clean glazed. Doors are typically boarded, split for stables. Sometimes loft or upper loading doors are found.
- A.18 The pattern of openings is a direct product of the historic function of the building over time, its size and character. Rural buildings were essentially cheap and functional with openings and other features provided only where they were essential. Given that many buildings were used as a means of shelter or for storage, openings were generally kept to a minimum with more exposed elevations having fewer openings than those which provided light, ventilation or access. Exceptions include 'model' farm buildings where landlords sought to adopt the latest agricultural improvements. Such buildings are often a little more 'architectural.'

Design Guidelines:

- The insertion of new openings in otherwise blank elevations or where there is no physical evidence of previous openings should, where possible, be avoided - particularly where they are visible from public vantage points such as footpaths and roads.

- Original openings that have been blocked up in the past should be re-used in preference to the creation of completely new openings, especially where they have been blocked up in an unsympathetic manner or using an inappropriate material.
- Where new openings are unavoidable, they should be kept to a minimum and great care taken in their positioning, scale and proportions.
- Where it is unavoidable to block up an existing opening, material that is sympathetic to the existing building should be used and recessed to emphasise and evidence the position of the original opening.
- New openings should not interrupt or impact on existing architectural features.
- The utilisation of openings in elevations which would compromise the privacy of adjacent (residential) development should be avoided.



Photograph showing timber casement windows painted “farm red”.

Roof

- A.19 The roof is one of the main features of any building as it can be a prominent dominant/visible structure in the skyline. The roof structure is often one of the main features that can suffer structurally when a building is left vacant for a period of time. In cases where work needs to be undertaken on the roof or to re-build it completely, all efforts should be made to restore the original materials and to re-use them. Where this is not possible any new material used should be similar to the original. Local or North Wales Slate or corrugated steel is the most common covering on old rural buildings in the area and therefore it is likely that it should be the roof cover of choice. There may be some instances when another roof covering is suitable, e.g. if the material is characteristic of the area's character. It should be ensured that any roof covering and the design of the roof complies with the guidance set out in Policy 29 (Sustainable Design). It should be sought to ensure that the height, pitch and eaves of the roof are not modified/changed from the original levels. Soffits and bargeboards are usually only found on later revival buildings: earlier buildings have no soffits the gables were often detailed with slated edges.
- A.20 Consideration should be given to details such as the roof edge and eaves together with the rainwater /associated guttering to ensure they are in keeping with the original building in terms of the type and materials used. It should be ensured that only a limited/essential amount of guttering is installed.
- A.21 Any proposal to convert a rural building should respect the nature and features that contribute towards its architectural value. Where possible it should be ensured that any modern/alien features are limited. In terms of materials, these should also be traditional and respect what already exists.
- A.22 To ensure that the building's character is respected, roof features should be avoided. As a rule, dormer windows are not permitted except where reinstating pitching and doorways. In cases where it is considered that a skylight would be the only option to allow more daylight into the building, appropriate measures should be taken to mitigate any negative visual effect this could have, e.g. by installing a roof light that is flush with the roof.

Walls

- A.23 Most rural buildings are built of local rubble laid in lime mortar. As a rule, earlier buildings were limewashed and later ones of pointed stone. Earlier buildings had timber or stone lintels/arches. By the mid-19th century brick was often used over doors and windows and later for quoining. With local stone no longer being

quarried it is important to salvage stone and reuse it for facing work. Old slurry renders and limewashes should be reinstated.

A.24 For the later 19th Century, corrugated iron was a cheap and quick method of constructing buildings typically rural bungalows, mission churches and church and chapel halls. These are fast disappearing type and any conversion should replicate this traditional form of cladding.

A.25 The walls must be able to support the load of the conversion proposed. It is on the onus of the applicant to ensure that the integrity of the existing structure is not compromised during the development. The original walls of the structure must be protected and cannot be dismantled during the conversion construction process.

Flues

A.26 Adapting an agricultural building for domestic or commercial use will invariably involve the need to provide some form of heating for its occupants and a requirement for a means of ventilation. Whilst boilers with balanced flues can negate the need for a projection through the roof slope, careful consideration should still be given to its position on the external elevation from which it protrudes.

A.27 The proposed internal arrangement of the building will dictate the likely external position of a flue and this should be carefully considered in the design process to ensure that it is located in the least prominent position possible.

A.28 Where a projecting flue is required to facilitate an open fire or a solid fuel stove etc, its position should be such that its visual impacts are minimised. Coating a stainless-steel flue in a dark colour can reduce the likelihood of sunlight reflecting from its shiny surface whilst minimising its impact.

Design Guidelines:

- Where no evidence of a chimney exists, introducing a new masonry chimney will not be acceptable.
- Where possible, existing chimneys should be used to house heating flues.
- Flues should be discreetly located to avoid visual harm.
- Flues should be painted or powder coated in a dark unobtrusive colour such as matt black/grey.

Rainwater Goods

A.29 The simple form and character of rural buildings is maintained in the detailing of rainwater goods. Whilst buildings of a higher quality would have incorporated half-round cast iron gutters fixed directly to the wall (no fascia board) by means of rise and fall brackets at the eaves level, the roof of most buildings would have simply extended slightly beyond the eaves leaving water to drain away from the base of the wall.

Design Guidelines:

- If the original building previously had no rainwater goods, the application of new gutters and downpipes should be kept to the minimum necessary avoiding fascia boards;
- Robust high quality fittings (such as cast iron) are preferable to plastic.
- Rainwater goods should be discreet and where possible located away from main elevations.
- New guttering should be painted to match the doors and windows and hung on rise and fall support brackets.



Photograph showing coated aluminium guttering painted black, or could be painted to match the windows. The guttering is attached with rise and fall brackets spiked directly to the wall.

Essential Services

- A.30 In many rural buildings it is unlikely that mains water, gas, electricity or drainage will be available and as such new uses, whether commercial or domestic will normally require the careful planning of new services.
- A.31 Where external services are provided they tend to be fairly rudimentary. Drainage, where it exists, is often defective. In some cases, there is no provision at all for rainwater disposal from buildings; the run-off from the roofs is simply allowed to saturate the ground. Where surface water drains are provided they often run to a nearby watercourse or soakaway whilst foul and waste drainage sometimes take the same route. Where connections exist, electricity and telephone lines are invariably brought in on overhead lines strung from posts.
- A.32 Utility cables, foul/sewage drainage pipe work, meter boxes and telephone wires can all be visually intrusive and undermine the character of a building if not considered at an early stage in the design process.
- A.33 Similarly, the last twenty-five years have seen a huge range of technological advances. The introduction of these technologies has subsequently led to the need for the installation of a range of 'equipment' that can be at odds with the traditional character of many rural buildings. Large aerials, satellite dishes and external cabling can easily undermine the rural character of not only the host building, but of the wider setting.
- A.34 The siting and design of installations required to facilitate access to new technology, including television antennas and satellite dishes, should be carefully considered at an early stage so that they can be positioned in discreet locations that minimise their visual impact.

Extensions

- A.35 In the context of Policy 7c) (Countryside) and Technical Advice Note 23 Economic Development paragraph 3.2.1 the building intended for conversion for alternative use should be suitable for the proposed use. The building in its current form (in terms of size) should be suitable, any required extensions should be subservient in scale and form.
- A.36 Where strong justification is submitted, it may be possible to justify small additions to the original building as long as these additions have been designed in a way that is sensitive, subservient and in keeping with the original building but not necessarily pastiche. Any extensions should add value to the building in terms of architectural legibility as well as a wider contribution to the local environment.

Is the building an appropriate building for conversion?

Why is the planning authority asking this question?	National Policy Reference	Local Planning Policy Reference
National Planning Policy requires the converted buildings to be in keeping with their surroundings. It also requires that this be done without extensive alteration or reconstruction.	Technical Advice Note 23 Paragraph 3.2.1 bullet 3: <i>'their form, bulk and general design are in keeping with their surroundings;</i>	Policy 7 (Countryside) <i>'Outside the identified Centres is countryside where development must be strictly controlled.'</i> ... Policy '7c) <i>'it constitutes the conversion of appropriate buildings to a range of uses...'</i> Policy 7 (Countryside) Reasoned Justification paragraph 4.45 and 4.46. Policy 14 (Conservation and enhancement of the Pembrokeshire Coast National Park) <i>does not permit development where this would have an unacceptable adverse effect on the qualities and special landscape and seascape character of the National Park including locally distinctive characteristics by...a) causing visual intrusion...c)failing to harmonise with, or enhance the landform, landscape and seascape character of the National Park...'</i>

Notes: Appropriate buildings in the countryside would include agricultural buildings, former churches and chapels, and dwellings where the residential use is now lost.

Buildings are required to make a positive contribution to the character of the area through their intrinsic architectural merit or their setting in the landscape or historical importance (see section below)

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.

A building may not be appropriate for conversion to a range of uses. Some uses are more appropriate in certain types of buildings.

Building's Character

- A.37 The character of many buildings across the National Park relies on simple and solid proportions, rural buildings characterised by locally available building materials. Change came in the later nineteenth century when slate from North Wales was increasingly used and during the early part of the twentieth century when corrugated steel and some brick was used. The vast majority of rural buildings are not listed and despite some loss of detail, most retain their form well. These seemingly 'ordinary' buildings give the National Park its special character in terms of built form.
- A.38 The form, bulk, design and materials used in some buildings can make them visually intrusive in the landscape. However, it is possible that in exceptional circumstances a modern utilitarian building may make a positive and important contribution to rural employment opportunities without detracting from the appearance of the landscape. Residential or serviced accommodation or holiday accommodation uses would be precluded in proposals for such buildings.
- A.39 Generally, the conversion of building(s) that are obtrusively located in the landscape or otherwise not in keeping with their surroundings will not be encouraged unless they are of significant heritage and architectural merit. However, exceptional consideration will be given to buildings which justify their retention for historic reasons. In these instances, the applicant will need to evidence the historical value of the building. This could be particularly relevant for buildings less typical of the area but nevertheless have historical merit – see 'Buildings of Historic Importance' below.

Will the conversion result in unacceptable impacts upon the structure, form, character or setting where the building is of historic and / or architectural interest?

Why is the planning authority asking this question?	National Policy Reference	Local Planning Policy Reference
National Planning Policy and the Local Development Plan requires this. Adapting a building for a specific use for which it is not suitable can have a detrimental impact on the character of the building, its contribution to the character of the local area.	Technical Advice Note 23 3.2.1 Bullet 6: <i>conversion does not result in unacceptable impacts upon the structure, form, character or setting where the building is of historic and / or architectural interest.</i> 3.2.3: <i>If the existing building is unsuitable for conversion without extensive alteration, rebuilding or extension, or if the creation of a residential curtilage would have a harmful effect on the character of the countryside, the same considerations relating to new house building in the open countryside will apply.</i>	Policy 14 (Conservation and Enhancement of the Pembrokeshire Coast National Park) focuses on the protection of the National Park qualities, its special landscape character including the need to protect against losing or failing to incorporate important traditional features. Policy 14 (Conservation and enhancement of the Pembrokeshire Coast National Park) <i>does not permit development where this would have an unacceptable adverse effect on the qualities and special landscape and seascape character of the National Park including locally distinctive characteristics by...a) causing visual intrusion...c)failing to harmonise with, or enhance the landform, landscape and seascape character of the National Park...'</i> <i>d)losing or failing to incorporate important traditional features.</i>

Notes: See also Question: Is the building suitable for the use? For example, residential conversions can often have detrimental effects on the fabric and character of rural buildings because such buildings are often unsuitable for conversion to residential use without extensive alteration, re-building and/or extension.

Buildings of Historic Importance

- A.40 Any external features of architectural or historic interest should be retained, particularly those that signal the building's former use. The character of a rural building is derived from its original function and every effort should be made to retain the original simplicity of scale and form, and to alter as little as possible both internally and externally.
- A.41 Several buildings survive from the 1939-1945 War, some in groups, others scattered. Whilst their historical importance is acknowledged, most are only suitable for low-key use such as storage due to their construction (often single-brick or prefabricated).
- A.42 Many later rural buildings are built of concrete block and are of plain utilitarian design and form. Such buildings are rarely worthy of conversion. Of this period are many Dutch barns with their characteristic curved roofs. These buildings are a typical feature of the landscape and may sometimes be suitable for an imaginative conversion.
- A.43 A short heritage impact assessment will need to accompany any conversion application for buildings of historic importance.

Listed Buildings

- A.44 There should be a general presumption in favour of the preservation or enhancement of a listed building and its setting, which might extend beyond its curtilage. For any development proposal affecting a listed building or its setting, the primary material consideration is the statutory requirement to have special regard to the desirability of preserving the building, its setting or any features of special architectural or historic interest which it possesses.³ Listed status covers the entire building, internal and external, as well as the historic curtilage, and so works which require consent might include the replacement of windows and internal alterations, for example. Applications for listed building consent for part or the whole of the same works as those covered by a planning application should be applied for and considered together.
- A.45 Whilst the thrust of the guidance is directed at buildings that are unlisted it should be acknowledged that a number of the National Park's traditional rural buildings are afforded additional protection as a result of their listed status. Listing confers legal protection to buildings of special architectural and historic interest which requires local planning authorities to ensure that any alterations are made in a manner that safeguards the building's special interest.

³ Paragraph 6.1.10 Planning Policy Wales Edition 12 | February 2024

- A.46 Listed Buildings are a valuable and irreplaceable part of the National Park's heritage and their preservation is of paramount importance. To this extent the Authority will encourage suitable and sensitive re-uses to ensure their long-term survival.
- A.47 Listing does not mean that no further changes will be allowed. It is the local planning authority's duty to control changes to Listed Buildings by ensuring that its architectural and historic interest is carefully considered before any alterations are approved. Change can often be accommodated if the special character of the building, which makes it worthy of listing, is understood and respected.
- A.48 However, there are restrictions on what you can do and any alterations which would affect its special character as a Listed Building either internally or externally will require Listed Building Consent.
- A.49 In considering whether to grant consent for development which affects a Listed Building or its setting, the Authority will have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- A.50 Listed Building Consent and Planning Permission are different types of approval although you may sometimes need both for the same work. It is strongly recommended that you contact the Authority's Building Conservation Officer (see Appendix C) if you have any queries or require advice about proposed repairs, maintenance or alterations to a Listed Building.

Chapels & Churches

- A.51 Rural chapels usually have a graveyard associated with them and this can be particularly sensitive in terms of family interments/unmarked graves. The same applies to rural churches, which often occupy ancient sites of high archaeological value. You are always advised to consult with an archaeologist in relation to development of rural churches.

Section B General Considerations

B.1 This section considers additional linked matters which have implications for the conversion of buildings and require particular attention:

- Converting a complex of buildings
- Archaeology
- Biodiversity
- Vehicular access and parking
- Rights of Way
- Lighting
- Energy Efficiency
- Curtilage
- Permitted Development Rights
- Use Classes Order 2022 Wales

Complex of outbuildings

B.2 Where the reuse of a complex of buildings is proposed the National Park Authority will expect an overall scheme for the site to be submitted and agreed by the National Park Authority in advance of applications for individual buildings being considered. Policy 7 (Countryside) Reasoned Justification paragraph 4.49 This is to ensure that a comprehensive approach to the site's development is undertaken.

B.3 In any conversion, the way a range of buildings is subdivided is of paramount importance. This is most obvious in residential conversions, particularly where multiple dwellings are created. Generally speaking, the division of buildings into readily identifiable 'components' such as barn, cart shed or stable and allocating a house to each, is generally the most appropriate approach to take, although this might not satisfy the needs or wants of the developer.

B.4 Where the conversion of a complex of buildings is proposed, the applicant will need to consider if the conversion will lead to the dispersal of activity on such scale as to prejudice town and village vitality. National Planning Policy requires that conversions do not undermine the vitality and viability of towns and villages. Technical Advice Note 23: Economic Development 2014, paragraph 3.2.1. Policy 56 (Retail) in the National Park ...Proposals that would undermine the retail hierarchy...will not be permitted.

Archaeology

- B.5 The Pembrokeshire Coast National Park has a rich archaeological and historical landscape. These represent a finite and non-renewable resource that can be easily damaged or destroyed by development. Once lost, they cannot be replaced.
- B.6 Older buildings can quite often be of archaeological interest. In some cases, buildings will have been erected over or incorporated into earlier buildings so evidence of these sites is crucial to our understanding of the origins and development of rural settlement across the National Park.
- B.7 With this in mind it is desirable that disturbance to archaeological features through activity such as underpinning, provision of oil tanks, new floors and landscaping is avoided or minimised. The extent of the likely archaeological significance of a site can be assessed through the commissioning of a simple evaluation to determine the extent and depth of modern made ground, undisturbed archaeological levels and the depth of natural subsoil. On the basis of such results, design, layout and construction work can be planned to minimise disturbance. Where an important archaeological site is identified and disturbance is unavoidable there will be a need for archaeological recording to form a part of the scheme.⁴

Biodiversity

- B.8 It will be necessary to ensure that any proposal conforms to national policy and guidance as included in Planning Policy Wales, Technical Advice Note 5: Planning and Nature Conservation, together with the relevant biodiversity policies in the Special Qualities Chapter of Local Development Plan 2 (Policy 10 to 12) as supported by the adopted Supplementary Planning Guidance on Biodiversity.⁵ Many buildings in the countryside provide a suitable habitat for a number of protected species including bats, barn owls and nesting birds.
- B.9 The landscape setting for the conversions within the countryside is more important than in other contexts within settlement boundaries. The retention of existing and historic hedgerows and trees should be prioritised to enhance the historic character of the landscape.

⁴ <https://www.pembrokeshirecoast.wales/planning/planning-policy/local-development-plan-2/supplementary-planning-guidance-ldp2/archaeology-supplementary-planning-guidance/>

⁵ <https://www.pembrokeshirecoast.wales/planning/planning-policy/local-development-plan-2/supplementary-planning-guidance-ldp2/biodiversity-supplementary-planning-guidance/>

- B.10 It will therefore be expected that an ecological survey, including a protected species survey, will be undertaken prior to the submission of an application for the conversion of a building in the countryside. The submission of bat and/or barn owl surveys is required prior to determination of a planning application. If these surveys are required by the local planning authority and are not submitted, the application may be refused on the grounds of insufficient information being provided to demonstrate protected species are not adversely affected. An ecological survey conducted early in the project's development will enable design work to take full account of constraints and opportunities on site. Welsh Government has advised planning authorities (23rd October 2019) ‘..where biodiversity enhancement is not proposed as part of an application, significant weight will be given to its absence, and unless other significant material considerations indicate otherwise it will be necessary to refuse planning permission.’
- B.11 Surveyors should use nationally recognised survey guidelines/methods where available. A suitably qualified ecological consultant will need to be employed to carry out any necessary survey(s). There are seasonal and time constraints to ecological surveying, which should be carefully planned into the development process. Appendix 3 of the Biodiversity Supplementary Planning Guidance sets out Ecological Survey Seasons. If you are unsure about survey requirements, pre-application advice should be sought.
- B.12 The species most likely to be present in these types of buildings are bats, barn owls and swallows. Bats, barn owls and swallows (nesting birds) are protected under the Wildlife and Countryside Act 1981; bats receive additional protection under the Habitats Regulations 1994.
- B.13 Further advice on the considerations associated with wildlife can be obtained by contacting the Authority's Ecology adviser (Please see Appendix 2 of the Biodiversity Supplementary Planning Guidance for contact details).

Vehicular Access and Parking

- B.14 With careful consideration, access and parking provision for conversion schemes can have a minimal impact on the landscape. Retaining existing farm tracks, concealing vehicles in existing outbuildings or using existing landscape features such as walls and hedges to screen parking areas are just some of the ways in which visual impacts can be minimised.
- B.15 Where new vehicle access and hard standings are required they should be sensitively designed to be discreet in terms of the route and have a minimal visual impact in terms of the surface treatment. The wholesale use of tarmac, the

widening of tracks and access ways and kerbing will generally not be appropriate.

- B.16 Commercial uses can often have a greater impact on landscape setting by virtue of the increased number of vehicles potentially using a site and the requisite access and parking requirements need to facilitate them. Concealing vehicles within existing buildings will be less of an option than arrangements which screen parking from view.
- B.17 The proposal must respect the character of the area including the site's setting. In more remote locations the upgrading or creation of access roads, providing electricity etc. can result in adverse impacts on the character of the area.
- B.18 Proposed development should seek to link to the existing transport network without extensive works. This includes connecting with existing sustainable transportation infrastructure.

Public Rights of Way

- B.19 In the countryside it is common for Public Rights of Way to pass close to rural buildings. The view and appearance of a development from a Public Right of Way has the potential to be an imposition on the special visual qualities of the National Park.
- B.20 Where a Public Right of Way crosses a site, the likely impacts of a proposed scheme should be carefully considered and designed so as not to impinge on people's ability to enjoy the open countryside.
- B.21 In these situations, the ability to link the site to the surrounding countryside and nearby settlements should be regarded as an opportunity and potential benefit to the proposal. Where possible, Public Rights of Way should retain their route alignment and in a design context, be treated to suit the character of the site so as to provide an attractive, accessible and secure route for all users.

Energy Efficiency

- B.22 Energy efficient conversions are encouraged; installation of renewable energy generating technologies must be undertaken in a sympathetic manner with an aim to mitigate any impact on the character of the building.
- B.23 The guidance from Cadw in the link in the footnote provides useful advice on how to install generating technologies without impacting detrimentally on the character

of a building.⁶

Design Guidelines:

- Principal elevations or dominant roof slopes should be avoided.
- Consider cumulative visual impact of more than one installation.
- Consider impact of colour, texture and finish of equipment against the fabric of a building.

B.24 'How to Improve Energy Efficiency in Historic Buildings in Wales' also provides detailed guidance on ways to reduce energy use in historic buildings and buildings of traditional construction.⁷

Lighting

- B.25 With regard to the design of lighting, a considered and sympathetic approach should be taken to preserve the character and aesthetic appeal of the property. Proposals should adhere to the *Planning for the Conservation and Enhancement of Dark Skies in Wales* Good Practice Guidance. Care must be taken to prevent energy being wasted and limit any negative environmental impacts arising as a result of a property's contribution to light pollution.
- B.26 The use of external lighting should be avoided in all areas other than where it is necessary for safety or security reasons. Lighting should be suitably controlled so that lights are only switched on when they are needed, for example through the use of motion sensors and automatic timers.
- B.27 To limit a lighting system's contribution to light pollution, lighting should always be orientated in a downwards direction and be suitably shielded such that no light is emitted above the horizontal. External lighting should use switch-off, dimming or PIR sensors. Lighting should be of an appropriate luminosity, only powerful enough to light the desired area without spilling light into the surrounding environment. Light should be of a 'Warm White' in colour with a light temperature not exceeding 2700 Kelvin.
- B.28 To limit internal lighting lightspill extensive glazing should be avoided. Blinds, curtains, external shutters and/or the use of tinted or electrochromic glass will be encouraged.

⁶ https://cadw.gov.wales/sites/default/files/2019-05/Micro_gen_booklet_EN.pdf

⁷ <https://cadw.gov.wales/sites/default/files/2022-04/How%20to%20improve%20energy%20efficiency%20in%20historic%20buildings%20in%20Wales%20-%20English.pdf>

Curtilage & Outbuildings

- B.29 The aim should be to avoid urbanisation of the property curtilage by having a low proportion of building area in relation to land area (i.e. the residential curtilage).
- B.30 A key characteristic of older development in the countryside is the way the landscape around it often flows up to the immediate edge of the buildings without any form of curtilage definition. This characteristic needs to be respected whilst meeting the needs of any new use.
- B.31 Ideally the curtilage needs to be kept as minimal as possible. Any enclosed private areas need to be carefully sited and contained, particularly in relation to public views and the surrounding landscape.
- B.32 Extending gardens into what has been farming land requires planning permission and should be avoided if possible unless there is historical evidence to prove otherwise. Consideration will be given to recreating historic curtilages. Historically, curtilages such as yards and gardens were often removed and annexed to adjacent fields/farmyard improvements, often removing their context.
- B.33 New walls or planting, which can be used to screen parking and garden areas, must follow the local vocabulary. Boundary treatments should be appropriate for the context of the area and should ensure that the area remains open in character where this was traditionally the case.
- B.34 Where boundary treatments such as gates, walls or native hedges already form part of the traditional character of the countryside location, these should be incorporated into the scheme. Opportunities for the repair of boundary structures where necessary will be favoured over their replacement.
- B.35 Where a number of dwellings are arranged around a single courtyard, delineating adequate individual amenity space can be more difficult to achieve. Generally speaking, courtyards should not be divided up but left as a common area leading to the 'front doors' of individual dwellings and where appropriate, used to provide vehicular access and parking for the development.
- B.36 The introduction of domestic paraphernalia such as sheds, greenhouses and manicured gardens/landscaping can undermine the rural character and setting of buildings within the countryside. Curtilage areas should therefore remain uncluttered and to achieve this it is standard practice for the Authority to remove permitted development rights or use legal agreements.
- B.37 Areas for the storage of gardening equipment etc. should be incorporated into existing buildings at the design stage to negate the need for new (stand-alone)

garages, sheds and general storage buildings within curtilage areas.

Design Guidelines:

- Traditional outbuildings should be retained, repaired and re-used wherever possible and their demolition resisted.
- Existing boundaries (walls and hedges) should be retained, repaired or re-planted to delineate curtilage areas.
- Where new boundaries need to be created they should, where possible, follow existing boundary lines and incorporate existing natural features such as hedgerows, stone walls or footpaths. Their form, type, height and material should reflect those of the associated buildings.
- Proposals for the provision of amenity space are likely to be resisted where they would adversely affect the appearance or character of the countryside and/or the setting of associated buildings.
- The use of tarmac, concrete block paving and pavers in areas of hard standing are alien in colour and character and should be avoided in preference to gravel.

Removal of permitted development rights

- B.38 Permitted development rights are provided by the Town and Country Planning (General Permitted Development) Order 1995 (the GPDO) to allow certain types of development to proceed without the need for a planning application since planning permission for them is deemed to be granted. The kinds of work permitted include most householder development e.g. extensions to dwellings (including conservatories), the replacement of windows and doors, erection of boundary walls and fences, the construction of garages and sheds, the siting of oil tanks and provision of hard standings.
- B.39 Where a planning application for conversion to a residential use is approved it is highly likely that the permission will be subject to the removal of 'permitted development rights'. This is to protect the rural and agricultural character of the farm buildings once conversion has been undertaken and will require that any future proposals for alterations or extensions to be submitted to the Authority for approval.

Use Classes Order 2022 Wales

- B.40 The Amendment to the Town and Country (Use Classes) (Amendment) (Wales) Order 2022 has resulted in three uses now being included are:
- Use Class C3 (dwelling houses; used as sole or main residences occupied for

more than 183 days in a calendar year).

- Use Class C5 (Dwelling houses; used otherwise than as sole or main residences covering a dwellinghouse other than as a sole or main residence and occupied for 183 days or fewer in a calendar year i.e. second homes)
- Use Class C6 (Short-term lets, covers the use of a dwellinghouse for commercial short-term letting not longer than 31 days for each period of occupation).

B.41 The amendments to the Use Classes Order may also be applied by the Local Planning Authorities by way of planning conditions to restrict the use of a development to one particular use class within the order, removing permitted development rights to move between uses.

B.42 Officers will consider the appropriateness of applying conditions to control occupancy given the amendments to the Use Classes Order 1987 which provides for the three use classes alongside implementation of Local Development Plan 2's policies on fulfilling the housing requirement and ensuring that new residential development is prioritized for uses that help sustain communities.⁸

⁸ https://www.pembrokeshirecoast.wales/wp-content/uploads/2023/03/08_23-Planning-Policy-Changes-re-Second-Homes-and-Short-term-lets.pdf

Section C Further information and contacts

For further information please contact the:

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