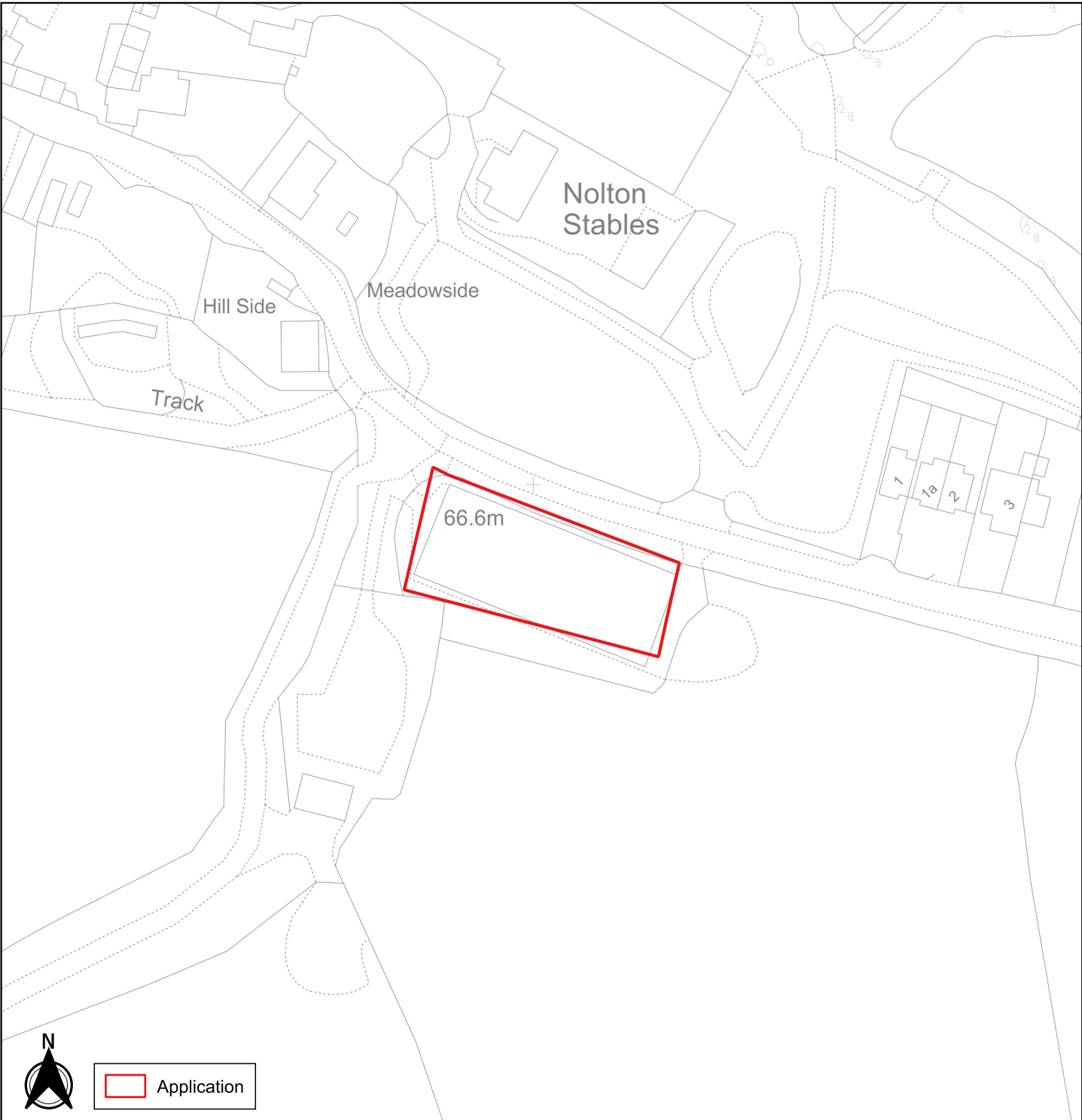




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# PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY

## COMMITTEE REPORT



**Ref No:** NP/24/0639/FUL

**Proposal:** Change of use of former historic agricultural storage compound to manege (in retrospect)

**Site Location:** East Nolton Farm, Nolton Haven, Haverfordwest, Pembrokeshire, SA62 3NW

**Recommendation:** **Approve**, subject to conditions

**This item is being reported to the Development Management Committee in accordance with the scheme of delegation as there is a conflict with national planning policy, but the application is recommended for approval.**

The plans and documents for this application can be viewed here: [Citizen Portal Planning - application details](#)

### Summary:

The application site forms a small part of an existing large field to the southeast of Nolton and a short distance due south of Nolton Stables. The proposal comprises the change of use of a former historic agricultural storage compound to a horse manege (in retrospect) within a corner of a large field within Nolton farmland.

Officers consider the proposed scheme to have a design, scale, and siting that is acceptable. The proposal will be well screened from the immediate and wider landscape and will not harm biodiversity or the area's special qualities.

The development is on land identified as best and most versatile agricultural land, however it is recognised that amending the siting of this manege to a location with lower grade agricultural land value would result in increased visual intrusion within the National Park landscape. The development is also recognised as one which requires a countryside location and supports an existing tourism business – these are material considerations which it is considered outweigh the National Planning policy presumption against the loss of best and most versatile agricultural land in this specific circumstance.

As such, the application is recommended for approval, subject to appropriate conditions.

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.

### Consultee Response

- Nolton and Roch Community Council: No objection
- PCNPA Ecologist: Conditional consent
- PCC Drainage Engineers: Support

## Public Response

A site notice and neighbour notification letters were posted in accordance with the requirements of the *Town and Country Planning (Development Management Procedure) (Wales) Order 2012*. No third-party representations have been received on this application.

## Policies considered - Development Plans

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

**Future Wales: The National Plan 2040** [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 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 38 (Visitor Economy)
- Policy 45 (Farm Diversification)
- Policy 59 (Sustainable Transport)
- Policy 60 (Impacts of traffic)

These policies can be viewed on the Policies page of the 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 (TANs) [www.gov.wales/technical-advice-notes](http://www.gov.wales/technical-advice-notes):

- TAN 5 – Nature Conservation and Planning
- TAN 6 – Planning for Sustainable Rural Communities
- TAN 12 – Design
- TAN 13 - Tourism

- TAN 15 – Development and Flood Risk
- TAN 18 – Transport
- TAN 23 – Economic Development

## **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. In respect of the proposal, the most relevant SPGs are:

- Biodiversity
- Coal Works – Instability
- Sustainable Design and Development
- Trees and Woodlands
- Landscape

## **Constraints**

- Biodiversity Issue
- Safeguarding Zone
- Hazardous Zones
- Recreation Character Areas
- Low Coal Risk
- Surface Coal
- High Coal Risk
- Affordable Housing Submarkets
- Seascape Character Areas
- Landscape Character Area

## **Officer's Appraisal**

The application site forms a small part of an existing large field to the southeast of Nolton and a short distance due south of Nolton Stables. The field forms part of the existing agricultural holding operated by the applicant. As identified in the Planning statement the applicants' own land in excess of 400 acres in and around the Nolton area.

The application documentation also notes that the existing agricultural holding has recently diversified its agricultural operations and horse stable business to include holiday lets. The statement notes that the applicants run a tourism business of which holiday accommodation is now the main source of income for the applicants under the branding of Nolton Coast.

The associated farmland is still owned and grazed or rented out by the applicants. The Planning Statement notes that historically Nolton Stables operated for many decades by the family from Nolton but that post covid horse leisure uses options have changed and that clients now bring their own horses and use the sand school as a warm-up before enjoying the various tracks on the farm for horse riding activities.

The website associated with Nolton Coast advises that the fun rides are for riders with their own horses. The sand school will therefore be used both commercially and by owners private use.

## 1. Site and Proposed Development

The proposal is for:

- A horse manege (in retrospect), which also incorporates a timber fence to the boundary and additional soft landscaping features to assist in screening the development from the surrounding landscape.

The proposed retrospective application seeks to retain a horse manege that is considered by officers to have a design, scale, and siting that is acceptable. The proposal will be well screened from the immediate and wider landscape and will not harm biodiversity or the area's special qualities. As such, the application accords with LDP2 and can be supported subject to appropriate conditions.

## 2. Relevant Planning History

- The application site has no recent planning history, and the current applicant has been submitted following an enforcement investigation. Related applications for the wider holding include:
- **NP/22/0601/FUL** – Farm diversification for the conversion of traditional barn complex to 4 residential units including extension to barn 3 and fenestration changes together with parking, amenity space, landscaping and use of existing biomass boiler heating system (partly in retrospect) – approved with legal agreement 5<sup>th</sup> February 2024
- **NP/22/0258/FUL** – Change of agricultural feed store to housing for biomass boiler and flue to serve East Nolton Farmhouse, the White House, Eira Cottage and a farm office (in retrospect) – approved 5<sup>th</sup> July 2022
- **NP/21/0758/FUL** – single storey side extension East Nolton Farmhouse – approved 16<sup>th</sup> February 2022

## 3. Key Issues

The application raises the following planning matters:

- 3.1 Policy and Principle of Development
- 3.2 Siting, Design, and Impact upon the Special Qualities of the National Park
- 3.3 Amenity and Privacy
- 3.4 Biodiversity, Protected Sites, Green Infrastructure & Landscaping
- 3.5 Access and Parking
- 3.6 Surface Water Drainage

### 3.1 Policy and Principle of Development

75. 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...*'.

76. Chapter 2 of Future Wales sets out the location of best and most versatile agricultural land recognising that we must continue to value and protect our agricultural land and ensure it can feed and support us.
77. 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.
78. A well-functioning planning system is fundamental for sustainable development and achieving sustainable places. PPW12 promotes action at all levels of the planning process, which is conducive to maximising its contribution to the well-being of Wales and its communities.
79. Policy 7 (Countryside) sets out the requirements for proposals in a countryside location, recognising that in accordance with national planning policy such development must be strictly controlled. Proposals which are acceptable in a countryside location include farm diversification (criterion b) and proposals for a rural enterprise or tourist attractions or recreational activity where the need to locate in the countryside is essential (criterion d).
80. Policy 45 (Farm Diversification) of LDP2 seeks to control development within a working agricultural unit, and assist in sustaining the agricultural unit. The development will need to be compatible with its locations and in harmony with and/or enhance the National Park landscape. The development should not adversely affect the vitality and viability of retailing within the nearby centres, and also cause no unacceptable adverse effects.
81. Technical Advice Note 6 on Sustainable Rural Communities notes that planning authorities should support the diversification of the rural economy as a way to provide local employment opportunities, increase local economic prosperity and minimise the need to travel for employment.
82. The application site falls within open countryside as Nolton is not recognised as a rural centre within the adopted LDP2. The proposed retrospective horse manege is to serve the existing business which includes an agricultural and tourism element, and also for private use by the applicant, given the manege will only be approximately 200 metres from the applicant's dwelling. The application is considered to be in accordance with the criterion of Policy 7 (Countryside) and Policy 45 (Agricultural Diversification) line with the adopted LDP2 and will provide an additional commercial facility to support the existing business currently located within Nolton.
83. The site is recognised as falling within an area of Agricultural Land Classification (ALC) Grade 2 land, with grades 1, 2, and 3 being the Best and Most Versatile (BMV) and be conserved as a finite resource for the future, which is recognised within Planning Policy Wales (PPW), paragraph 3.58.
84. Development management considerations and decisions should give BMV land considerable weight to protect the areas of land from development due to its special

importance. PPW - paragraph 3.59 goes on to indicate that BMV land should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower-grade land has an environmental value recognised by a landscape, wildlife, historic, or archaeological designation that outweighs the agricultural considerations.

85. The application was fully retrospective on land which had previously been used for storage of silage, and officers need to consider the siting of this development in terms of BMV and whether any material considerations would outweigh the BMV considerations as outlined above. The area that forms the agricultural land surrounding the application site is a mix of grades 2, 3a, 3b, and non-agricultural. The main areas of open landscape are 2 and 3b. These areas form part of an open area of landscape which falls within the Landscape Character Area (LCA) 12 – St. Brides Bay. This is an area where the landscape has a strong visual relationship with the coastline from the broad views across St. Brides Bay, which is mostly undeveloped. The guidance within LCA 12 seeks to preserve the agricultural and woodland mosaic character, together with locating developments into the landscape at the edges of settlements through careful siting, a selection of materials, form, and screening.
86. The current siting falls within an area of grade 2 BMV land but is sited on the edge of the existing settlement at Nolton, which provides good access to the site. The area is within an existing scrub corner of a field and screened from the road and other properties by a mature Pembrokeshire Hedgebank. To move the development away from grade 2 land into grade 3b land or above would result in the development being sited on higher ground and closer to the coastline, which would make it significantly more visible within the immediate and wider landscape. Officers also recognise that this development supports the operation of an existing business. As such, officers consider that whilst the current siting is within grade 2 land, there are material considerations within the application that outweigh the guidance given within Future Wales and PPW on BMV land and result in the application being supported by officers in this instance based on the site-specific information, appropriateness in terms of scale and use, and the principle of the development in relation to LDP2.

### **3.2 Siting, Design, and Impact upon the Special Qualities of the National Park**

87. Policy 08 (Special Qualities) of LDP2 is a strategy policy that 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 that individually or in combination contribute to making the National Park unique.
88. 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.
89. Policy 29 (Sustainable Design) of LDP2 requires all development proposals to be well designed in terms of place and local distinctiveness. The proposed horse manege follows a traditional design that incorporates a sand finish to the riding area, which is

bounded by a timber fence with a mixture of existing and proposed soft landscaping features to the outside of the fence line bounding the manege.

90. The proposed sand school is for a mix of business and private use and has an acceptable design and size. The proposed siting on a lower portion of the existing agricultural holding which is surrounded by existing hedgebanks on three sides and considered to be well screened from the immediate and wider landscape is considered to be a better location for the siting of such a facility, given that other alternative options for the siting of the proposed horse manege within this holding area are only on exposed existing agricultural fields which have a high degree of inter visibility between this land and the adjacent coastline, therefore making these locations not ideal for such a facility. Based on the above considerations, the proposal in its current location is considered to protect the special qualities within this area of the National Park.
91. The proposal also includes additional landscaping on the existing hedge banks to provide additional screening and to provide additional landscaping on the boundary of the facility, which fronts the existing field.
92. Based on the above considerations, the proposal is considered acceptable in terms of its siting, design, and impact on the area's special qualities and appropriate in terms of Policies 8, 14, and 29 of LDP2.

### **3.3 Amenity and Privacy**

93. 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 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.
94. Policy 30 (Amenity) supports Policy 14 (Conservation of the Pembrokeshire Coast National Park) in not allowing development that creates a visual intrusion.
95. Given the nature of the proposal and the distance to the nearest residential dwelling located some 34 metres to the northwest, but with intervening landscaping features, officers consider that the proposal is acceptable in terms of Policy 30 of LDP2. The siting of the development is not considered to create a visual intrusion.

### **3.4 Biodiversity Protected Sites, Landscaping and Green Infrastructure**

96. PPW12, TAN5, and LDP2 Policy 11 (Nationally Protected Sites and Species) requires biodiversity to be considered 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. Details will be sought via condition for the green roof to ensure that the species mix will positively add to the overall biodiversity capabilities of the site.

97. 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.
98. 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. 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.
99. A Green Infrastructure Statement has been submitted in support of the application, which notes a stepwise approach to its considerations. Given that the application is retrospective, the baseline must be considered prior to the works being carried out on site. Therefore, a new benefit must be sought from the site as a silage storage area before its current use as a horse manege. As such, the proposed native tree and marginal shrub planting to the existing boundary hedge banks is supported, but further details are required on the proposed species, size, planting distances, and ongoing maintenance regime.
100. A planning condition will be imposed to ensure these details are received and agreed upon and carried out on site within an appropriate timescale. No lighting is proposed as part of this planning application, and it is stated that the horse manege will only be used during daylight hours. A planning condition will be imposed to ensure that if any external lighting is proposed at a future date, full details must be agreed upon before its provision on site. Based on the above, the application is supported in terms of Policy 11 of the LDP2.

### **3.5 Access and Parking**

101. 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. Additionally, Policy 60 (Impacts of traffic) of LDP2 permits development where appropriate access can be achieved.
102. The application site use as stated above, will be in combination with the existing riding school and stables, together with occasional private use by the applicant. Therefore, the proposal is considered to meet the requirements of Policy 59 of LDP2, given that the horses and riders will already be accommodated in proximity within the Nolton area as part of existing commercial operations within Nolton.
103. Access to the horse manege will be provided off the existing private lane that serves existing agricultural fields and riding tracks, which leads across fields towards Druidston beach. The application proposal is not considered to raise any highway concerns in respect of Policy 60 of LDP2, given that the access points into the manege

are both from a private access land and also an agricultural field. As such, officers consider the application to be supported in terms of Policies 59 and 60 of LDP2.

### **3.6 Surface Water Drainage**

- 104. Policy 29 (Sustainable Design) of LDP2 requires development to be well designed and to demonstrate an integrated approach in relation to water and drainage.
- 105. 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.
- 106. Pembrokeshire County Council Drainage Engineers had responded to the application to confirm that they had concerns regarding the surface water drainage from this area and whether it would be discharged to a sustainable drainage system. Without a SAB application being submitted, they were concerned that the application did not demonstrate a suitable method for the disposal of the surface water from this area, which measured in excess of 100 m<sup>2</sup>.
- 107. However, after further consultation with the drainage team, they now confirm that a SAB application has been submitted for this site and that the details are acceptable.
- 108. Based on this additional information, the Drainage Engineers are now happy to support the current application for the retrospective manege. As such, the proposal can be supported in terms of Policy 32 of LDP2 and TAN 15.

## **4. Conclusion**

- 109. The proposed retrospective application seeks to retain a horse manege that is considered by officers to have a design, scale, and siting that is acceptable. The proposal will be well screened from the immediate and wider landscape and will not harm biodiversity or the area's special qualities. Whilst the proposal is on best and most versatile land, it supports an existing rural business and the relocation onto land of lower agricultural value would result in an increased visual impact – these material considerations are therefore considered to outweigh the general presumption in Future Wales and in national planning policy against the loss of such land. As such, the application accords with LDP2 and Officers suggest it can be supported subject to appropriate conditions.
- 110. 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.

## **5. 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:
  - Drawing Ref: 01b Location Plan and Block Plan (Received 25/11/2025)
  - Drawing Ref: 02a Site Plan (Received 25/11/2025)
  - Drawing Ref: 03a Manage Details (Received 25/11/2025)**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. Prior to the installation of any external lighting, full details of lighting shall be submitted to and agreed in writing by the Local Planning Authority. The lighting scheme should include:
  - Details of the siting and type of external lighting to be used;
  - Drawings setting out light spillage in key sensitive areas surrounding the site;
  - Details of lighting to be used both during construction and operation;
  - Measures to monitor light spillage once development is operational.
 The lighting shall be installed as approved during construction and operation. No external lighting beyond that approved within the lighting plan shall be installed thereafter.  
**Reason:** A lighting plan should be submitted to ensure lighting details are agreed upon before installation and to reduce the impacts of lighting in the interest of protected species, their habitats, and commuting corridors. Policy: Local Development Plan 2 - Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 11 (Nationally Protected Sites and Species), 14 (Conservation of the Pembrokeshire Coast National Park), and 30 (Amenity).
  
4. Within 3 months from the date of this consent, details of the proposed native landscaping species scheme shall be submitted to the local planning authority for approval, in writing. The scheme shall include the following details:
  - Scale plan on proposed site layout showing precise site-specific locations
  - Schedules of plants (trees and hedges)
  - Plant species
  - Plant supply sizes
  - Proposed numbers of each proposed species
  - Hedge planting density and method (e.g., double staggered)
  - Implementation programme/timescale/phasing of planting within the next available planting season
  - Management and replacement of failure details
 Development shall thereafter take place in accordance with the approved details and within the first available planting season.  
 Any existing plants retained; or new plants planted in accordance with the approved scheme which, within a period of 5 years after implementation of the approved development are removed, die, become diseased or damaged to such extent that, in the opinion of the Local Planning Authority, the function in relation to this planning

approval is no longer delivered, shall be replaced with plants of similar size and specification. Any variations to the details of the documents and plans must only be undertaken after the proposed variations have been agreed in writing by this authority.

**Reason:** In the interests of maintaining a suitable scheme of landscaping to protect the visual amenity of the area, to maintain the special qualities of the landscape and habitats through the protection, creation, and enhancement of links between sites and their protection for amenity, landscape, and biodiversity value of the site and the surrounding area. Policy: Local Development Plan 2 – Policies: 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation and enhancement of the Pembrokeshire Coast National Park), 30 (Amenity), SPG 07 – Biodiversity, Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009), and Technical Advice Note (TAN) 10: Tree Preservation Orders.