

Parc Cenedlaethol Arfordir Penfro

Pembrokeshire Coast National Park



Pembrokeshire Coast National Park Local Development Plan 2

Replacement Dwellings in the Countryside

Supplementary Planning Guidance 3rd 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 replacement dwellings. 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 Biodiversity.¹

The Policy Context

Future Wales 2040 & Local Development Plan 2

4. 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 The Pembrokeshire Coast National Park Local Development Plan 2 was adopted in September 2020. The spatial strategy of the Local Development Plan 2 similarly channels development towards towns and villages.
5. **Policy 7 (Countryside)** of the Local Development Plan 2 strictly controls development in the countryside.
6. The Authority does not have a specific policy on **replacement dwellings** in the countryside in Local Development Plan 2 (LDP 2). LDP 2 does however have a

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

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>

number of policies that set out the strategic principles that will apply to all development, including Policy 29 (Sustainable Design) and Policy 31 (Minimising Waste). If not properly justified or designed, there is a danger that Replacement dwellings can result in:

- the use of more building materials and further depletion of the earth's resources – Policy 29 (Sustainable Design) and Policy 31 (Minimising Waste) requires development to be well designed in terms of the use of materials and resources.
 - the potential loss of a building that contributes positively to the character of the local area. Policy 29 (Sustainable Design) requires the development to be designed well in terms of place and local distinctiveness and Policy 14 (Conservation and enhancement of the Pembrokeshire Coast National Park) requires that development does not have an unacceptable adverse effect on locally distinctive characteristics by losing or failing to incorporate important traditional features.
 - seeking the introduction in the countryside of larger more expensive properties that are less affordable in a location that struggles with affordability issues in the first instance.
7. Given the resurgence of the housing market in recent years the Authority has received a number of applications for replacement dwellings in the countryside many of which fail to consider that in principle, development in the countryside must be strictly controlled and instead focus on maximising the development footprint within the confines of the whole site.
8. 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.
9. It is encouraged that this guidance be used alongside the submission of a pre-application due to the nature of the development.

The Status of Supplementary Planning Guidance

10. 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 stems from, and is consistent with, a development plan. SPG does not introduce any new planning policies.

11. In accordance with Welsh Government advice, this draft SPG will be subject to public consultation and adoption by the National Park Authority.
12. The following guidance has been split into two sub-sections. The sub-sections relate to the following topics:-

Section A: Key Questions

Section B: General Matters

13. This Supplementary Planning Guidance will provide further guidance in relation to the planning considerations in relation to applications for replacement dwellings in the countryside. The 'countryside' in this context is defined as being sites located outside the Centres, as defined within Local Development Plan 2.

Section A: Key Questions

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

Q1. Is the building considered to be making a positive contribution to the character of the area through its intrinsic architectural merit or its setting in the landscape?

Why is the planning authority asking this question?	National Policy Reference	Local Planning Policy Reference
The proposal should not result in the loss of building which contributes positively to the character of the local area. If an application seeks to demolish and replace a building that the Authority considers to be worthy of retention because of its contribution to the visual and intrinsic character of the National Park's rural landscape, then planning permission is unlikely to be granted in accordance with Policy 14.	Planning Policy Wales (Edition 12 February 2024) Paragraph 6.0.2 <i>"The special and unique characteristics and intrinsic qualities of the natural and built environment must be protected in their own right, for historic, scenic, aesthetic and nature conservation reasons. These give places their unique identity and distinctiveness and provide for cultural experiences and healthy lifestyles."</i> TAN 12 Design 5.8.1 <i>"The special qualities of the rural landscape and coastline of Wales should be recognized. The qualities should be enhanced through conservation of the character of the countryside and by achieving quality in new development."</i>	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... d) losing or failing to incorporate important traditional features.</i>

Notes: Character

The historic and/or aesthetic character of many buildings across the National Park relies on simple and solid proportions, rural buildings characterized 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.

Where the dwelling is making a positive contribution to the local character of the area and the owner wishes to improve or increase the available residential accommodation then the only option will be an extension to the dwelling.

**Answer to Q1 is no
– go to next question**

**Answer to Q1 is yes
– planning permission unlikely
to be granted**

Q2. Does the present dwelling have a lawful residential use?

Why is the planning authority asking this question?	National Policy Reference	Local Planning Policy Reference
In countryside locations, the existing dwelling must have an established use as a residential unit otherwise it would be considered to create a new dwelling which is contrary to National planning policy. The original dwelling must have a lawful permanent residential use and be capable of residential occupation in its current condition and form before any acceptable approved alteration. See paragraph 'Error! Reference source not found.' below for further detail.	Planning Policy Wales (Edition 12 February 2024) Development in the Countryside 3.60 <i>'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.'</i>³	Policy 7 (Countryside) <i>Outside the identified Centres is countryside where development must be strictly controlled ...</i>

³ 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.'

Notes: Lawful Use

In considering residential units that are subject to an application for demolition and replacement the Authority will have to, in the first instance, ensure that the proposed unit for demolition has a legal use as a residential unit, i.e. it will be necessary to ensure that no abandonment of the unit has taken place. 'Abandonment' is when the original permitted use has been lost. In order to determine if an abandonment of use has taken place then the proposal will have to be considered against the following criteria⁴:-

- a) The physical condition of the property;
- b) The period that has elapsed since the building was last used;
- c) If the building has been used for alternative uses;
- d) The owner's intention;

Buildings without a lawful residential use may be suitable for conversion – see Policy 7c) (Countryside) which deals with the conversion of buildings in the countryside and its supporting supplementary planning guidance.

**Answer to Q2 is yes
– go to next question**

**Answer to Q2 is no -
planning permission unlikely to
be granted**

Q3. Is demolition of the existing dwelling justified?

Why is the planning authority asking this question?	National Policy Reference	Local Planning Policy Reference
When a building is demolished and a new one is put in its place, the emissions locked into the original building are wasted and the new building's material manufacturing and construction processes create new emissions. Even energy efficient buildings can take decades to save more operational energy emissions than were created in the construction process.	Planning Policy Wales (Edition 12 February 2024) 5.13.5 <i>'Waste prevention and approaches towards encouraging reuse and recycling should be considered at an early stage as part of materials choices and design.'</i> TAN 12 Design Page 22 Response <i>'should incorporate adaptable and flexible development that can respond.....to minimise the need to demolish and rebuild.'</i>	Policy 29 (Sustainable Design) <i>All Proposals for development will be expected to demonstrate...to be well designed in terms of: g) materials and resources</i> Policy 31 (Minimising Waste) <i>Development must minimise, re-use and recycle waste generated during demolition and construction ...'</i>

⁴ Trustees of Castell-y-Mynach Estate v Taff-Ely BC [1985] JPL 40

Notes: Reuse or Demolish

In the past there was debate about whether it was better for the climate to demolish an old energy-hungry building and build a well-insulated replacement. However, it is now recognised that in most cases it may be possible and appropriate to retrofit older properties instead of completely demolishing them.

‘185. The construction, demolition and excavation sector is responsible for 62 per cent of the total waste generated in the UK. It is estimated that 80 per cent of buildings currently standing will still be in use in 2050: if the UK is to meet its net zero goals, the majority of these will require retrofitting to become energy efficient.

186. There is a clear policy imperative to reduce the consumption of resources in the building and construction sector, to reduce waste material arising from demolition and replacement of existing properties, and to prioritise work to reduce emissions attributable to the built environment.

187. The evidence we received⁵ consistently recommended that retrofit and reuse be prioritised over new building order to conserve resources, reduce waste, minimise embodied carbon emissions, and provide a cost-effective solution to delivering on housing demands.’

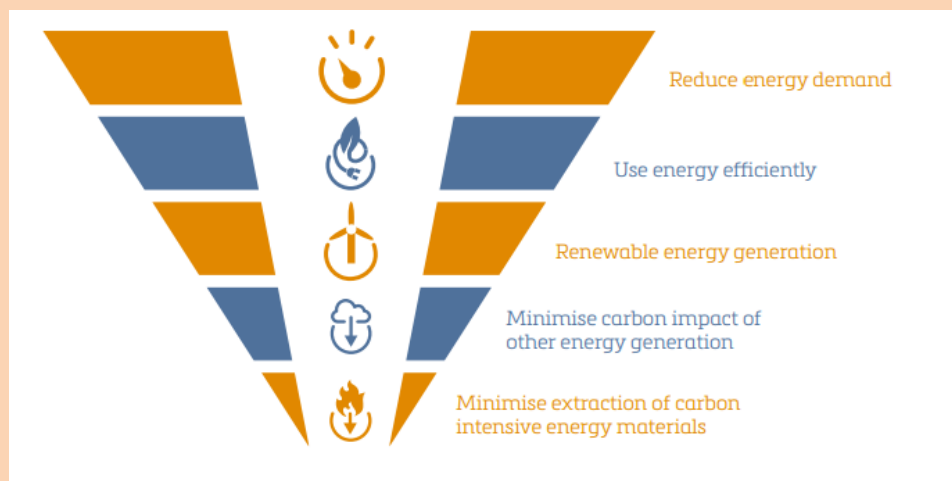
‘213. Retrofit and reuse of existing buildings, where practicable, should be prioritised over new build to conserve resources, minimise embodied carbon emissions, reduce demolition waste and deliver cost-effective solutions to delivering on housing demand.’⁶

In accordance with Policy 31 (Minimising Waste) if a replacement dwelling is proposed it must be demonstrated that the existing dwelling is not capable of retention through renovation. Figure 1.0 below from Planning Policy Wales 12 outlines the energy hierarchy where the principal aim is to reduce energy demand.

To demonstrate that renovation is not a viable proposition a Structural Report, prepared by an appropriately qualified person, should be submitted with the application that sets out the evidence demonstrating how demolition and re-building outweighs the benefits of reuse through refurbishment.

⁵ Chartered Institute of Building; Green Alliance; Dr Niamh Murtagh et al; Royal Institute of British Architects; Royal Institution of Chartered Surveyors; The Institution of Structural Engineers

⁶ House of Commons Environmental Audit Committee Building to net zero: costing carbon in construction First Report of Session 2022–23 Report, together with formal minutes relating to the report Ordered by the House of Commons to be printed 11 May 2022 <https://committees.parliament.uk/publications/22427/documents/165446/default/>



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Where an approval for a replacement dwelling is granted, the LPA will usually require a Construction Method Statement (CMS) to be submitted prior to commencement. The CMS will be expected to include details of a scheme for recycling/disposing of waste resulting from demolition. Applicants will be expected to demonstrate that they are recycling and reusing as much waste on site as possible.

Answer to Q3 is yes – go to next question.

Answer to Q3 is no – planning permission unlikely to be granted unless evidence substantiates the benefits of demolition.

⁷Planning Policy Wales Edition 125.8.1 The planning system should support new development that has very high energy performance, supports decarbonisation, tackles the causes of the climate emergency, and adapts to the current and future effects of climate change through the incorporation of effective mitigation and adaptation measures.

⁸ *Definition of Previously Developed Land Planning Policy Wales Edition 12: The curtilage is defined as the area of land attached to a building. All of the land within the curtilage of the site will also be defined as previously-developed. However, this does not mean that the whole area of the curtilage should therefore be redeveloped. For example, where the footprint of a building only occupies a proportion of a site of which the remainder is open land (such as a hospital) the whole site should not normally be developed to the boundary of the curtilage. The planning authority should make a judgement about site layout in this context, bearing in mind other planning considerations such as policies for the protection of open space, playing fields or development in the countryside. They should consider such factors as how the site relates to the surrounding area and requirements for on-site open space, buffer strips and landscaped areas.'*

⁹ 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.'

¹⁰ Policy 36 Relocation of existing permanent dwellings affected by coastal change

Q4. Is the replacement dwelling within the same footprint as the existing dwelling?

Why is the planning authority asking this question?	National Policy Reference	Local Planning Policy Reference
The aim is to ensure that the proposal respects national policy to strictly control development in the countryside and also that it should not create unacceptable visual intrusion. To this end the Authority would expect that the resulting development should reflect the same amount of development that it is replacing. As a very minimum the proposals should not cause a greater adverse visual impact than the existing dwelling. A dwelling sited on the same footprint as the original dwelling would in the main be most likely to achieve that objective. Relocation within the curtilage of the existing dwelling would need to demonstrate clear benefits to be supported. This does not mean, however, that the whole curtilage can be developed.^{8 8} See paragraph 'Error! Reference source not found.' below for further detail.	Planning Policy Wales (Edition 12 February 2024) Development in the Countryside 3.60 <i>'...new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled.'</i>^{9 9} TAN 12 Design Page 19 notes that a Design response following appraisal of context should respond to: • <i>Landscapes and townscapes, culture and biodiversity</i> • <i>Locally distinctive patterns and forms of development</i> • <i>Existing buildings, infrastructure, urban/rural landscapes and public art</i> • <i>Clear boundaries and established building lines</i> • <i>Appropriateness of uses and the mix of uses and densities</i> • <i>Easily recognizable and understood features and landmarks</i>	Policy 7 (Countryside) <i>Outside the identified Centres is countryside where development must be strictly controlled ...</i> 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: Siting

The aim should generally be to locate the replacement dwelling in the least conspicuous

position within the curtilage subject to the new dwelling having a satisfactory relationship with any surrounding development. The best way to achieve this is normally for the dwelling to be sited on the same footprint as the original dwelling. The new unit should be located on the footprint of the existing building unless there are advantages, for example, in terms of visual impact and/or impact on the amenities of local residents or moving from an area susceptible to flooding.¹⁰ If it is possible to prove that there are benefits to be had by locating the dwelling on an alternative location within the curtilage of the site then this would be acceptable where there is no increase in the visual impact of the dwelling within the landscape. The assessment of impact should include views from a distance as well as from the immediate neighbourhood.

Answer to Q4 is yes – go to next question.

Answer to Q4 is no – planning permission unlikely to be granted unless there are environmental gains to re-siting.

Q5. Is the dwelling proposed of a similar scale and size to the original dwelling?

Why is the planning authority asking this question?	National Policy Reference	Local Planning Policy Reference
The proposal should not create unacceptable visual intrusion which, as a very minimum, should be no greater in scale and size than the existing dwelling being replaced. A dwelling which is of similar scale and size as the original dwelling would in main most likely achieve that objective.	TAN 12 Design 5.8.3 <i>“Many buildings in rural Wales occupy visibly prominent locations and the scope for damaging local distinctiveness through inappropriate development may be even greater than in densely developed areas.”</i> Planning Policy Wales (Edition 12 February 2024) Housing Delivery 4.2.25 <i>In the open countryside, away from established settlements recognised in development plans or away from other areas allocated for development, the fact that a single house on a particular site would be unobtrusive is not, by itself, a good argument in favour of permission; such permissions could be granted too often, to the overall detriment of the character of an area.</i>	Policy 14 (Conservation and enhancement of the Pembrokeshire Coast National Park) 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 b) intensifying a use which is incompatible with its location...c)failing to harmonise with, or enhance the landform, landscape and seascape character of the National Park...’

Notes: Size and Scale

The replacement of small country dwellings with more grandiose houses can radically change the character of the site to one of a more suburban nature and also reduce the supply of smaller rural dwellings. The development should be of a similar scale and size as the original building to be in accordance with criterion b) of Policy 14 of Local Development Plan 2.

Appropriate consideration will need to be given to the mass, design, height and openings

of the proposed development to ensure that the proposal blends in naturally into the landscape. The development must preserve the identity, character and local distinctiveness of the landscape and safeguard the Special Qualities of the National Park. The unit's original floor area should be considered when considering if the development's scale is of a similar footprint to the original. Where justification has been received that would mean that the floor area would need to be larger than the original building, it is considered that this addition should be no larger than 30% of the floor area of the original unit. It is noted that this figure is a guide and not a target and every application will be assessed individually on its merit. It should be ensured that the addition in the floor area is essential in terms of practicality and should not be part of an aspiration for a larger house. No outbuilding should be considered when calculating the floor area of the residential unit.

A well-designed replacement dwelling which is of a different scale and size would need to demonstrate clear benefits in reducing the impact on the surrounding landscape to be supported.

Answer to Q5 is yes – go to next question.

Answer to Q5 is no – planning permission unlikely to be granted unless there are clear benefits in reducing impact on the surrounding landscape.

Section B: General considerations

Design

B.1 It is expected that residential replacement will include the principles of good quality design – Policy 29 (Sustainable Design) supported by the Authority’s Sustainable Design Guidance. Proposals should give consideration to the traditional features of the design and materials and where appropriate should accord with the nearby built environment. Any design should respect the character of the landscape and should not introduce a development that is incongruous or intrusive within the landscape.

Curtilage

B.2 The proposal must respect the character of the area including the site’s setting in accordance with Policy 14 (Conservation and enhancement of the Pembrokeshire Coast National Park).

B.3 The aim will be to avoid urbanisation of the property curtilage by having an acceptable proportion of building area in relation to land area (i.e. the residential curtilage¹¹) rather than walls and fences to enhance the green rural context.

B.4 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. Exceptionally, consideration will be given to recreating historic curtilages. Historic curtilages such as yards and gardens were often removed and annexed to adjacent fields/farmyard improvements. Where there is a need to create a new or additional curtilage for a replacement dwelling, this needs to be as minimal area as possible.

B.5 Where boundary treatments such as gates, walls or Pembrokeshire hedgebanks already form part of the traditional character of the countryside location, these should be incorporated into any scheme. Opportunities for the repair of boundary structures where necessary will be favoured over their replacement.

¹¹ Planning Policy Wales Edition 12: 1. The curtilage is defined as the area of land attached to a building. All of the land within the curtilage of the site will also be defined as previously-developed. However, this does not mean that the whole area of the curtilage should therefore be redeveloped. For example, where the footprint of a building only occupies a proportion of a site of which the remainder is open land (such as a hospital) the whole site should not normally be developed to the boundary of the curtilage. The planning authority should make a judgement about site layout in this context, bearing in mind other planning considerations such as policies for the protection of open space, playing fields or development in the countryside. They should consider such factors as how the site relates to the surrounding area and requirements for on-site open space, buffer strips and landscaped areas.

Lighting

B.6 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 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.7 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.8 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.9 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.

Removal of permitted development rights

B.10 'Permitted Development Rights' allow specific types of development to take place without the need to receive planning permission for that work. Given that these proposals lie within the countryside when planning permission is granted to replace a dwelling, a planning condition will be used to remove the permitted development right associated with adaptations, extensions and other relevant associated development to enable the National Park Authority to have control over any future developments that take place on the site. This means that any proposed development on the site for extensions and adaptations will be subject to a planning application.

Extensions

- B.11 Where strong justification is submitted, it may be possible to support 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. Any extensions should add value to the building in terms of architectural design as well as a wider contribution to the local environment.