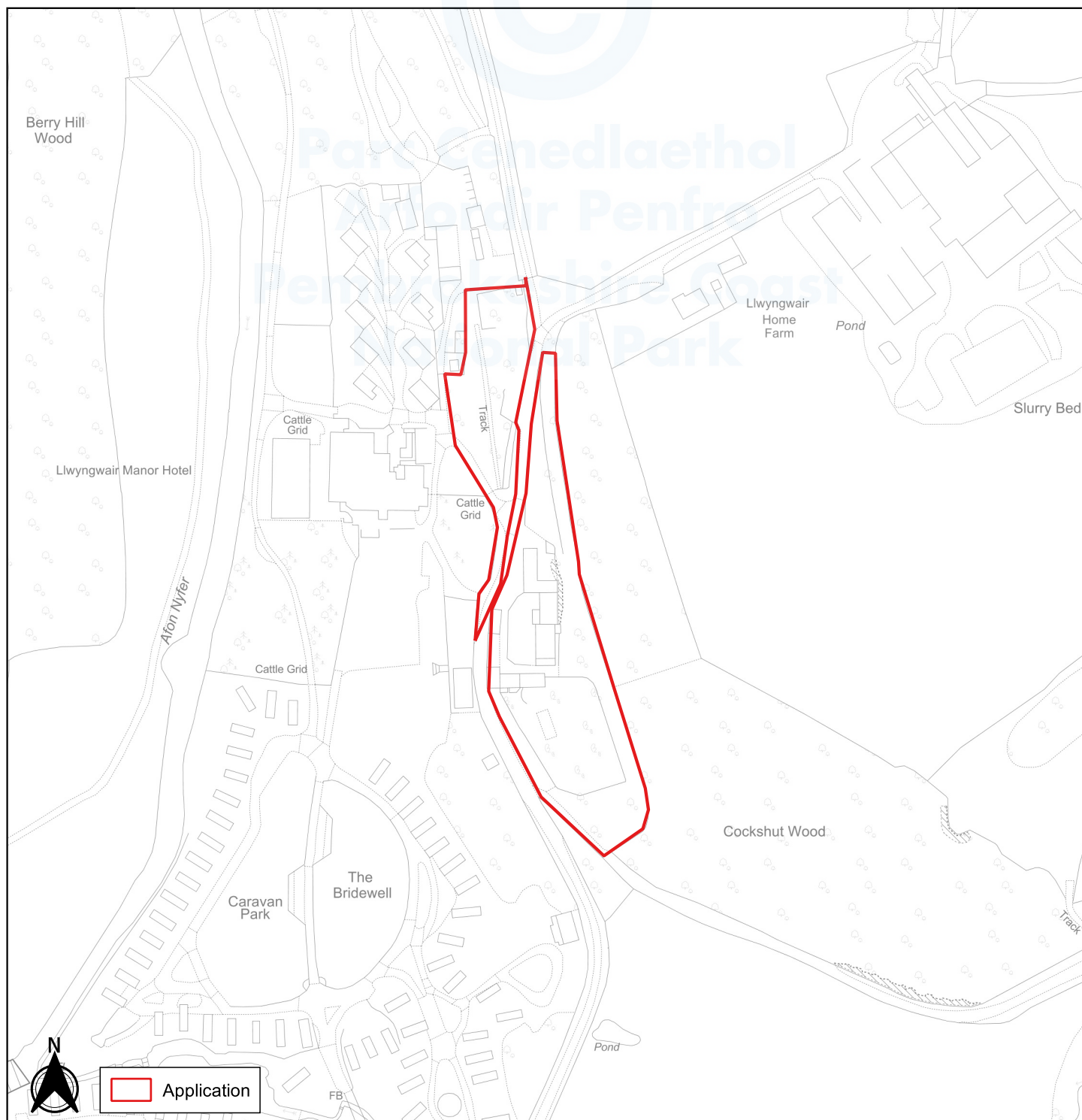
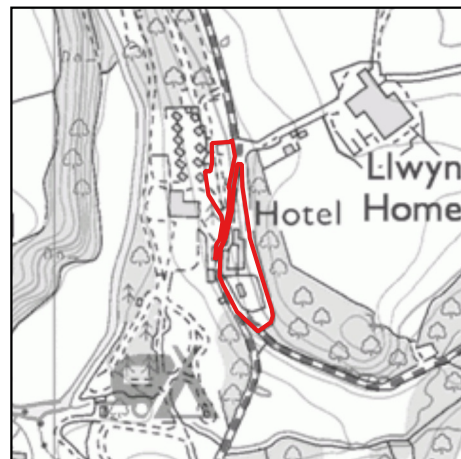
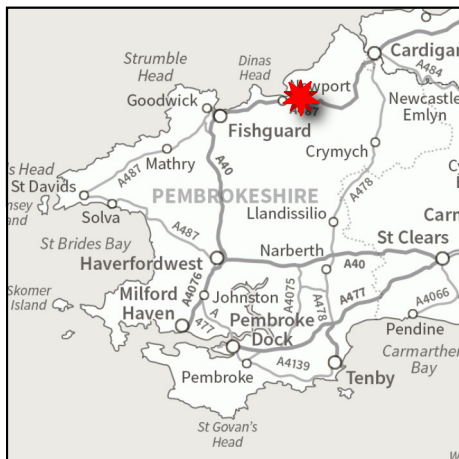




Parc Cenedlaethol
Arfordir Penfro
Pembrokeshire Coast
National Park

Graddfa/Scale: 1:2,500



PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY DELEGATED DECISION REPORT



Ref No: NP/25/0143/FUL
Proposal: Conversion of outbuildings into three dwellings
Site Location: Llwyngwair Home Farm, Newport, Pembrokeshire, SA42 0LX

Recommendation: **Approve**, subject to conditions

Summary:

This application is for the conversion and extension of a range of outbuildings to three residential dwellings. Two of the outbuildings are Listed. The various sections of the site are referred to within the submitted plans as:

- Stables (upper section of main complex) '*Stables at Llwyngwair Manor*' (Cadw Record Number 12778)
- Dairy (lower section of main complex) '*Coach House at Llwyngwair Manor*' (Cadw Record Number 12779)
- Pig sty (northern complex)

The proposed scheme is in keeping with the character of the Listed Buildings, and their setting in terms of design and form and the application can be supported subject to conditions.

The buildings are recorded on the 'buildings at risk register'. Supporting information has been provided which demonstrates that the cost of conversion alongside a financial contribution for affordable housing would make the scheme unviable. The Authority considers that in this instance the value of delivering a conversion scheme which will ensure the preservation and restoration of the Listed Buildings, is a significant material consideration which in this instance outweighs the need for a financial contribution.

This application is being presented to the Development Management Committee as the decision is contrary to the requirements of Policy 48 (Affordable Housing) of LDP2 which requires commuted sums provision off-site for conversions and the prioritisation of affordable housing in conversions. The Authority scheme of delegation requires that departures to the Development Plan are considered formally by Committee.

The scheme has been advertised as a departure to Local Development Plan 2.

Details of the application can be viewed via the following link - [Citizen Portal Planning - application details](#)

Consultee response

- Nevern Community Council: No adverse comments
- NRW: No adverse comments
- Wales and West Utilities: Advisory
- Trunk Road Agency: No adverse comments
- Heneb: The Trust for Welsh Archaeology: Conditional consent
- PCC Drainage: Conditional Consent
- PCNPA Buildings Conservation Officer: No adverse comments.
- PCNPA Access Officer: Conditional consent
- PCNPA Ecologist: Conditional Consent

Public Response

A site notice and neighbour notification letters were posted in accordance with requirements of the *Town and Country Planning (Development Management Procedure) (Wales) Order 2012*.

No representations have been received

Policies considered

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 07 (Countryside)
- Policy 08 (Special Qualities)
- Policy 11 (Nationally Protected Sites and Species)
- Policy 14 (Conservation of the Pembrokeshire Coast National Park)
- Policy 29 (Sustainable Design)
- Policy 30 (Amenity)
- Policy 32 (Surface Water Drainage)
- Policy 40 (Self-catering development)
- Policy 50 (Housing Development Proposals)
- Policy 59 (Sustainable Transport)
- Policy 60 (Impacts of traffic)

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

Planning Policy Wales (PPW12)

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

The primary objective of PPW12 is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties such as the Socio-economic Duty.

- [Planning Policy Wales 12](#) (PPW12).

Technical Advice Notes

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

www.gov.wales/technical-advice-notes:

- TAN2 – Planning and Affordable housing
- TAN 5 – Nature Conservation and Planning
- TAN 6 – Planning for sustainable rural communities
- TAN 12 - Design
- TAN 15 – Development, flooding and coastal erosion (2025)
- TAN 24 – The Historic Environment

LDP2 Supplementary Planning Guidance

In addition, the Authority produces Supplementary Planning Guidance (SPG) on various topics, and these may be material considerations in the determination of any future application made. In respect of the proposal the most relevant SPG's are: [Supplementary Planning Guidance \(LDP2\) - Pembrokeshire Coast National Park](#)

- SPG – Affordable housing
- SPG - Biodiversity
- SPG - Landscape
- SPG - Planning Obligations
- SPG - Seascapes
- SPG - Sustainable Design and Development
- SPG - Trees and Woodland

Constraints

- Ancient and Semi Natural Woodland - within 25m
- Special Area of Conservation - within 500m
- Biodiversity Issue
- Rights of Way Inland - within 50m
- Recreation Character Areas
- Affordable Housing Submarkets
- Landscape Character Area
- Listed Building

Officer's Appraisal

The site comprises a complex of existing agricultural outbuildings including two Grade II-Listed Buildings immediately south-east of Llwyngwair Mansion and just south-west of the Llwyngwair Home Farm.

The buildings originally comprised coach housing and stabling for the mansion (facing the old back drive) with the buildings later used in conjunction with the more modern home farm when the mansion and grounds were redeveloped as hotel and caravan site.

The buildings are on the Authority's Buildings at Risk Register as many of the original fixtures were removed and some openings altered, and the buildings are in varying states of condition.

The buildings are of local slate/rubble construction, comprising two groups. The larger group lies to the east of the driveway to the Home Farm, the building set at two levels. The upper buildings face a concrete yard. To the north end is a pedimented coach house which returns east as a stable (this retaining some good original fixtures including stalls, mangers and arcaded racks). A long-lofted range runs south of this, fitted with modern concrete cow cubicles. To the south again, there is a long unroofed range.

The southern buildings are set at a lower level, accessed from a ramp off the main entrance, screened from the driveway by a tall stone wall. The east-west range of buildings includes a cart house to the west with a stable/loose box to the east and an unroofed range beyond. Against the screen wall is a single-storey stone outbuilding at the north end, the space between this and the cart house occupied by a modern lean-to.

Map research confirms the existence of the coach house and stable by 1843, the southern extension and ramp/lower group in existence by 1888 as shown on the 1888-1913 Ordnance Survey maps of the area. The other group lies to the west side of the driveway comprising single-storey former kennel and garden buildings. There are three main ruined structures with a number of minor buildings. This group is not mentioned in the list description but is clearly of listed status as historic ancillary buildings.

1. Site and Proposed Development

The proposal comprises a conversion which will deliver three dwellings:

Stables

- Repair of existing trusses (as features within new roof structure) and reinstatement of natural slate coverings
- Addition of four conservation roof-lights
- Reinstatement of traditional window and door joinery based on surviving fragments.
- Window replacement generally in small-paned vertically sliding sash with painted finish, other plainly glazed where historic joinery missing/replaced
- Replacement of some missing doors (including coach house doorways) with simple glazed doors.
- Glazing of pitching-doors to east elevation and addition of extra pitching-door feature
- Timber-framed sunroom extension to east within angle between building ranges with green roof
- Traditional stone-faced garage extension set back at north end with slate roof and traditional boarded doors
- Subdivision of largely stripped interior for domestic use including replacement of collapsed/removed lofts
- Conservation and repair of surviving stable fixtures as feature within proposed reception hall

Dairy

- Reinstatement of pitched slate roofs
- Reinstatement of traditional joinery to windows (largely plainly-glazed to avoid conjecture)
- Reinstatement of door joinery (mostly fixed boarding with integral glazing)
- Provision of flue pipe to extension
- Removal of later roof to north-western shed and replacement with flat green roof to create potting shed/bat roost
- Reconfiguration of upper section of retaining yard wall (mostly rebuilt in concrete block) and re-facing in stone to match the original structure
- Provision of two conservation roof lights
- Subdivision of (stripped) interiors to for domestic accommodation

Pigsty

- General reinstatement of pitched slate roofs with conservation roof lights as shown
- Infill of existing openings with doors and windows detailed in simple joinery
- Extensions to west and south of existing central building, the larger extension linking to the southern building.
- Refurbishment of northern structure as ancillary use and bat roost
- Retention of enclosure walls and reinstatement of traditional gates

2. Relevant Planning History

- NP/25/0146/LBA – Pending

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
- 3.7 Foul water

3.1 Policy and Principle of Development:

1. Section 38 of *The Planning and Compulsory Purchase Act 2004* requires that in determining a planning application the determination must be in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the National Park comprises Future Wales - The National Plan 2040 (FW) and the Local Development Plan 2 (LDP2).
2. 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...*'.
3. 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.
4. 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.
5. The site lies outside any Centre Boundary as defined by Local Development Plan 2 and is therefore classified as Countryside under Policy 7 (Countryside) of LDP2. Policy

7 strictly controls new development in the countryside and details the types of development that are acceptable, in principle. One of these is set out in criterion d of the policy which permits the conversion of appropriate buildings to a range of uses with market housing being given priority in residential conversions. National planning guidance refers to buildings needing 'to be of a form, bulk and general design which are in keeping with their surroundings'.

6. Local Development Plan 2 Policy 50 (Housing Development Proposals) also supports housing development proposals in a countryside location where the development relates to the conversion of a rural building.
7. The reasoned justification to Policy 7 (Countryside) sets out what is considered to be an appropriate building for residential conversion. At paragraph 4.45 it notes that within the National Park, buildings that make a positive contribution to the character of the area through their intrinsic architectural merit or their setting in the landscape are considered as suitable. It is essential that this is not diminished through development, and the careful use of locally relevant building materials such as stone, clom and slate are utilised. Conversion must not result in an unacceptable adverse effect upon the structure, form, character or setting of the building and developments must display of local building methods and skills; whilst retaining the interest and charm of the functional requirement of the building its layout and its proportions.
8. A structural appraisal report has been submitted as part of the application and details that the buildings exhibit a variety of structural issues, including leaning walls, failing lintels, rotting timber elements and roof deterioration. It also states that while some structures are suitable for repair and repurposing, others may require partial or complete rebuilding to meet the structural demands of a domestic conversion with the pigsty in particular noted as having walls in an advanced state of disrepair.
9. Policy 48 of the LDP2 (Affordable Housing) requires the provision of off-site provision or commuted sums in relation to development proposals relating to conversions of a building in the countryside. The Authority's Supplementary Planning Guidance on Affordable Housing require a financial contribution to ensure the delivery of Affordable Housing. As set out in the SPG, this is typically a contribution of £250 per square metre of the total floorspace.
10. The valuation report was commissioned by the agent using an independent MRICS FAAV & RICS Registered Valuer. The valuation concluded that the development has insufficient viability to contribute to affordable housing. The information has not been assessed by a third-party surveyor commissioned by this authority but has been assessed by Officers. By referring to the average costs from the Build Cost Information Service (BCIS). We have reviewed Average Price data rebased to the Pembrokeshire region. BCIS median rate for conversion, 'one-off' housing detached (3 units or less – as it's the case with Llwyngwair) is £2,286 per square metre and Lower Quartile is £1,131 per square metre. The Llwyngwair valuation proposed a construction cost of £2449 per square metre for all buildings. Given the requirement of the two listed buildings, and the necessity of using traditional building materials (natural slate, timber framed windows), and the overall level of repair required, this is considered reasonable. There are some minor variations in other aspects of costs and valuations such as professional fees being higher, than would usually be assumed, however, conversely there is a slightly lower profit margin assumed, so overall, the assessment is considered robust, demonstrating a net loss of over £1.5 million.

11. On this site the Listed nature of the buildings and the degree of restoration work required is considered to result in a significantly higher than usual level of abnormal costs which result in the scheme being unable to support an affordable housing contribution. Given the very clear level of abnormal associated costs and the submission by a RICS surveyor, no further independent assessment has been required on this specific application.
12. The authority considered that with the buildings in question being Listed and on the 'Local Buildings at Risk Register', the safeguarding of these assets carried significant weight as a material consideration and on balance - and having regard to the particular circumstances of this case – the benefit of restoring these buildings outweighs the local need arguments.
13. Policy 40 (Self-Catering Development) of LDP2 states that proposals for self-catering development will only be permitted on a brownfield site in a Centre or in a conversion proposal in a countryside location (see Policy 7 and Policy 48) where the site is shown to be inappropriate for market or affordable housing provision. The authority has therefore considered whether or not it is appropriate to remove the permitted development rights which would allow the property to be used as a holiday let. The applicant has applied for full residential use and given the lack of financial viability of the overall scheme it is considered that it would be beneficial to allow flexibility of all potential residential uses given this scenario.
14. The proposed development complies with the requirements of LDP 2 Policy 7 (Countryside), and Policy 50 (Housing Development Proposals). In not making a contribution to Affordable Housing the proposed development is a departure to Policy 48 (Affordable Housing), however in supporting the retention and restoration of important historic buildings, the proposed development supports the special qualities of the National Park.
15. Overall, it is considered that the proposed development aligns with the overall strategy and aims of the National Park Local Development Plan 2, whilst being a departure to Policy 48 (Affordable Housing) and is considered acceptable in terms of scale and use, and the principle of the development.

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

16. Policy 08 (Special Qualities) of LDP2, is a strategy policy which refers to the special qualities of the National Park and lists priorities to ensure that these qualities will be protected and enhanced. These qualities are characteristics and features which individually or in combination contribute to making the National Park unique. The historic environment is identified as a special quality which should be protected and where possible enhanced.
17. 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.
18. Policy 29 (Sustainable Design) of LDP2 requires all development proposals to be well designed in terms of place and local distinctiveness.

19. The proposal was developed following discussions with the PCNPA Buildings Conservation Officer and the PCNPA Tree and Landscape specialist to ensure that the development seeks to enhance the historic character of the site, whilst resulting in a net benefit to biodiversity upon completion of the development.
20. The development comprises two Grade II listed buildings:
 - Stables at Llwyngwair Manor (Cadw Record Number 12778)
 - Coach House at Llwyngwair Manor (Cadw Record Number 12779)
21. The proposed designs have sought to maintain as much of the original fabric of the Listed Buildings as possible, whilst implementing modern materials and designs that will complement the site and the surrounding vernacular. Aspects of the design include minimal glazing, reusing materials where possible, and the implementation of local landscape features such as a Pembrokeshire hedgebank boundary feature. The site has been left unmanaged for a length of time that has resulted in natural colonisation of self-seeded trees within the site; however, these are not a feature of the site as referenced in the 1888 OS maps of the site and would not be a constraint to the development. The removal of these trees will allow the site to be used effectively, whilst restoring the historic appearance of the site, and their loss can be suitably mitigated.

Listed Buildings

22. The Historic Environment is a special quality identified within Policy 8 as contributing to the wider special qualities of the National Park. With regards to Listed Buildings Section 96 of the Historic Environment (Wales) Act and the provisions of TAN 24 (The Historic Environment) requires that special regard be paid to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
23. Heneb were consulted and checked this proposal against the Regional Historic Environment Record, which currently stands at over 75,000 sites of archaeological and historical interest. These records have been formally adopted by resolution of your Authority for the purposes of the Town & Country Planning (General Permitted Development) Order 1995. This search has revealed that the buildings in question are recorded as forming part of a grade II listed complex of structures associated with the adjacent Llwyngwair Manor (PRN's 58936; 58937; 58938 & 120415). Although the current Manor and outbuildings date to the 18th century, the original site is believed to be Medieval in origin (PRN 1480). Therefore, in order to protect potential archaeological interests, Heneb recommend that should consent be given a WSI condition should be attached to the above application in line with Planning Policy Wales and TAN 24 sections 4.13 and 4.14. As such a condition will be applied to any a permission.
24. The PCNPA Buildings Conservation Officer was also consulted on the proposal to assess the impact of the proposed extensions, ancillary buildings and new fenestration / doors on the existing buildings, especially in consideration of the two buildings which comprise the stables block which are Grade II listed buildings and noted:
The proposal is subject to a separate listed building application which is considered acceptable in principle. In terms the planning application, Section 314A of the 1990 Town and Country Planning Act in considering whether to grant planning permission for development which affects a listed building or its setting, states that the local planning authority must have special regard to the desirability of preserving
 - a) the listed building,

- b) *the setting of the building, or*
- c) *any features of special architectural or historic interest the building possesses*
In terms of the setting of surrounding listed buildings - notably Llwyngwair Manor and Llwyngwair Lodge, distance and intervening topography combine to make any impact negligible.

25. Additionally, the PCNPA Buildings Conservation Officer has considered the development under a listed buildings application (NP/25/0146/LBA) and considers the proposal acceptable subject to condition.
26. The development is considered appropriate in relation to the site-specific information and in regard to Policies 8 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park) and 29 (Sustainable Design) of LDP2 and can be supported subject to suitable conditions ensuring the retention of appropriate materials within the buildings.

3.3 Amenity and Privacy:

27. Policy 30 (Amenity) of LDP2 seeks to protect the amenity of people living in the National Park and states that development will not be permitted where it has an unacceptable adverse effect on amenity, particularly where:
 - a) the development would have a detrimental impact on the quality of the environment currently enjoyed by people living, working or visiting the Park; and/or
 - b) the development is of a scale incompatible with its surroundings; and/or
 - c) the development leads to an increase in traffic or noise or odour or light which has a significant adverse effect; and/or
 - d) the development is visually intrusive.
 Policy 30 (Amenity) supports Policy 14 (Conservation of the Pembrokeshire Coast National Park) in not allowing development that creates a visual intrusion.
28. The proposed scheme is considered to be in keeping with the character of the Listed Buildings and is unlikely to have a detrimental impact on the amenity and privacy of the site and surrounding area. The scale of the development is compatible with the buildings and the site, and the development focuses on the retention of the existing outbuildings with minimal extensions subservient buildings such as garages.
29. The proposals seek to preserve the historical outbuildings as close as possible to existing with the introduction of some necessary features to support residential living.
30. In relation to privacy issues, although the site is alongside a public footpath and in proximity to Llwyngwair Manor to the west, and Llwyngwair Home Farm to the northeast, the site is not in proximity to other residential properties, and there is unlikely to be any impact on the amenity and privacy of these properties.
31. The outbuildings are Listed Buildings and are currently on the local buildings at risk register, so the sensitive renovation of these disused outbuildings will prevent them from falling into further disrepair, whilst contributing to the amenity of the area.
32. The proposed layout with separate distinct areas for each of the three dwellings proposed is considered to deliver appropriate residential amenity for each of the three properties.

33. Overall, the development aligns with the Policy 30 (Amenity) of LDP2 and can be supported.

3.4 Biodiversity, Green Infrastructure & Landscaping and Protected Sites

Biodiversity impacts

34. PPW12, TAN5 and Policy 11 (Nationally Protected Sites and Species) of LDP2 requires biodiversity considerations to be taken into account in determining individual applications. The presence of a species protected under UK or European legislation is a material consideration when dealing with applications that are likely to result in disturbance or harm to the species or its habitat.
35. The application documents included a bat survey report and tree report for the site, along with a Green Infrastructure Statement and associated plans and documents to clarify works required to implement the development, along with mitigation and enhancement measures proposed.
36. Surveys of the site by the agent as well as external consultees identified the potential and confirmed presence of Bats, Dormice and Owls (and their associated habitats) which will pose a constraint to the development. Additionally, the '*Assessment and Survey for Protected Species*' states that 'In the absence of dedicated surveys for other species/groups, presence is assumed (*reptiles, amphibians and other small mammals including dormice*)'.
37. Accordingly, the PCNPA Tree and Landscape Officer has considered the proposal in terms of the immediate tree and landscape proposals, and the PCNPA ecologist and NRW have considered the development in regard to other ecological constraints related to protected species and their habitats.

Net Benefit for Biodiversity and Green Infrastructure

38. 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 and that overall there is a net benefit for biodiversity and ecosystem resilience, resulting in enhanced well being.
39. 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.
40. 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.
41. A Green Infrastructure Statement and associated tree survey reports were provided with the application along with details of landscaping on the proposed plans.
42. The proposed development will result in a loss of approximately 70 trees throughout the entire; however, a site visit confirmed that these are predominantly self-seeded specimens of low-quality growing within the historic curtilage of the buildings. A review

of historic maps of the area noted that there is *Ancient Semi-Natural Woodland* located to the north, and there is *Restored Ancient Woodland* adjoining the site to the east; however, these designations do not spread into the development plot. Additionally, the site is shown on 1888 OS maps as being separated from the woodland by a defined track and being part of the developed Llwyngwair estate. The presence of the buildings and associated curtilage would confirm that the site would not be ancient woodland (as it can be seen to have not been wooded continuously since 1600AD, so would not meet that criteria).

43. The loss of these trees is considered acceptable in order to enable the site to be developed fully; and the presence of the adjacent woodland, and proposed site landscaping is considered to result in a net benefit for biodiversity upon completion of the development, subject to conditions.
44. As per the requirements of PPW12 each tree lost will be replaced with at least three trees, and/or in this case a metre of hedgebank and planting as mitigation, which is acceptable. The site visit identified that the majority of the trees proposed for removal were self-seeded specimens growing within the original developed area. There were some established trees (approximately six) with higher value than the self-seeded specimens that required removal; however, a landscaping scheme which focused on these being replaced with feature trees as part of any future development would be appropriate within the full mitigation. A scheme of landscaping is provided detailing the location and construction of the proposed Pembrokeshire hedgebanks which is acceptable; however, additional information will be required in relation to maintenance and management which can be conditioned.
45. Plans have been provided that show protective fencing of retained trees which is acceptable; however, a dedicated plan providing details as the fencing type will be required, including monitoring of the protection measures during development, along with consideration of protecting areas proposed for landscaping to prevent compaction / contamination during the development process. A standalone tree protection plan and any necessary Arboricultural Method Statements can be secured prior to commencement through a condition.
46. A woodland management plan is also provided to assist in maintaining and enhancing biodiversity which is welcome.
47. A sedum roof is proposed; however, it is advised that sedum-only roofs are avoided in the National Park, due to the limited number of native sedum species. There are only two species of sedum native to Pembrokeshire that are suitable for inclusion in a green roof:
 - *Sedum acre* - Goldmoss stonecrop
 - *Sedum anglicum* - English stonecrop

The implementation of a sedum roof with only two species would result in a roof with limited ecological and aesthetic value, and use of other sedums (including garden varieties) for a green roof in Pembrokeshire would not be acceptable as they can become invasive, putting native species at risk.

As such, a condition will be applied to any approval requiring a native green roof to be implemented to mimic natural habitats to provide the maximum benefits for the wildlife and landscape of the National Park such as:

 - Pembrokeshire 'coastal' species green roof

- UK native wildflower green roof

48. Overall, the proposed development will result in the loss of trees on site; however, these are a reasonable loss in order to maintain these listed buildings currently at risk. The application also provides a suitable landscape scheme which will protect and enhance the retained features on and immediately adjacent to the site, as well as implanting additional landscaping within the site to ensure that a Net benefit for biodiversity and green infrastructure enhancement is achieved upon completion. Subject to suitable conditions, the proposal can be supported in regard to the immediate landscape.

Protected Sites

Habitat Regulations Assessment

49. SACs and SPAs are of European importance. Under the *Conservation of Habitats and Species Regulations (2017)* (the Habitats Regulations), all public bodies (including planning authorities) must have regard to the requirements of the EC Habitats and Birds Directives when carrying out their functions.
50. Before authorising development or adopting a land use plan which is likely to have a significant effect on a SAC or SPA (including where outside the boundary of the SAC or SPA), planning authorities must carry out an appropriate assessment of the implications for the designated features, consult NRW and have regard to NRW's representations.
51. NRW were consulted as part of the application and provided the following response dated: 17th April 2025:
52. *'The site is within 500m of the Pembrokeshire Bat Sites and Bosherton Lakes Special Area of Conservation (SAC) and Llwyngwair Mill Site of Special Scientific Interest (SSSI), which is designated for greater horseshoe bats, with lesser horseshoe bats being listed as a qualifying feature. The survey identified over 8 species of bat on site including both greater and lesser horseshoe bat. Barbastelle bats were also recorded on the site and are a designated feature of the North Pembrokeshire Woodlands SAC located within 3km.*
53. *We note that we have records of dormice within 2km of the site in connected habitat.... and that Cockshut wood immediately adjacent to the site is identified as restored ancient woodland. We note that the pigsty site is extremely over grown and that the whole site the tree plan has identified over 70 trees proposed for removal under the application. No further details have been provided indicating how much habitat will need to be removed and its suitability to support dormice. Therefore, we advise that you consult your in-house ecologist to determine whether it is considered that dormice surveys are required or an assumed presence is acceptable. If surveys are advised and confirm that dormice are present and likely to be affected, or if assumed presence is acceptable, the application should include a mitigation strategy setting out details of all the mitigation that will be put in place to mitigate and/or compensate the anticipated impacts.*
54. *Given the proximity of the site to an SAC where the qualifying feature is light sensitive, we advise that any lighting scheme should only include the minimum level of lighting required, ensuring that all mitigation, retained habitat, boundary vegetation and flight lines remains unilluminated. While we note that some details of lighting have been*

included within the application, we do not intend to comment on this until all relevant survey information has been submitted.'

55. *Given the proximity of nearby SACs, we advise that the application is considered under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). On the basis of the information provided, we are unable to advise you that the proposed development would not be likely to have a significant effect on the aforementioned SAC's. Furthermore, the proposal is not directly connected with the management of these sites for nature conservation purposes.*
56. *We therefore recommend that you, as the competent authority, carry out an 'appropriate assessment' of the proposal. The purpose of the appropriate assessment would be to assess the implications of the proposal with respect to the conservation objectives of the European site. The conclusions of the appropriate assessment should enable you to ascertain whether or not the proposed development would adversely affect the integrity of the Pembrokeshire Bat Sites and Bosherton Lakes SAC and North Pembrokeshire Woodlands SAC.*
57. *We consider that there is insufficient information with the application to confirm the likely impacts of the proposals on bats and dormice and confirm that the proposals are unlikely to result in a detrimental impact to the maintenance of the favourable conservation status of the population(s) of these species concerned. We advise that the above identified information is submitted in support of the planning application to aid the local authority's determination of the application.*
58. NRW were reconsulted following provision of additional documents in the form of a bat report and species mitigation and responded on the 2nd September 2025 noting:
59. *'We continue to have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome if the documents identified below are included in the approved plans and documents condition on the decision notice:*
 - *Assessment and Survey for Protected Species at Llwyngwair Home Farm Newport, Pembrokeshire SA42 0LX by Landsker Ecology, V3 dated 30/07/2025*
 - *Drawing number 54 titled BAT ROOST & OWL BOX DETAILS by Harries Planning Design Management, revision C dated 10.07.25'*
60. The PCNPA Ecologist also completed a HRA for NP/25/0143/FUL on the 2nd of September 2025 which was sent to NRW for consideration. NRW responded on the 8th of September 2025 confirming they had received the authority's Habitat Regulations Assessment (HRA) for this proposed development and as the appropriate nature conservation body, to your appropriate assessment (AA) (referenced: NP/25/0143/FUL/dated: 02/09/2025) under Regulation 63 of the Conservation of Habitats and Species Regulations 2017, as amended note that:
61. *'In consideration of the mitigation measures detailed we agree with your conclusion that the development is unlikely to have an adverse effect upon the integrity of the SAC.'*
62. In relation to the proposed development, it is considered that the site-specific information and appropriateness align with Policies 10 (Sites and Species of European Importance) and 11 (Nationally Protected Sites and Species) of LDP2 and complies with the requirements of the Environment Act (Wales 2016), the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations (2017) and subject to conditions and advisory notes can be supported.

3.5 Access and Parking

- 63. 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.
- 64. Additionally, Policy 60 (Impacts of traffic) of LDP2 permits development where appropriate access can be achieved.
- 65. Trunk roads were consulted due to the site access meeting the A487 and advised that Welsh Government as the highway authority for the A487 trunk road does not issue a direction in respect of this application. The PCNPA Access team were also consulted due to the proximity to a public right of way and noted:
- 66. *'...the line of public footpath PP71/9 is affected by the red lined development area, however, the proposed development is laid out so as not to obstruct the public right of way. Drawing 41 shows the developer plans to accommodate public footpath PP71/9 within the proposed development, with a short section of the proposed vehicular access driveway utilising footpath PP71/9. We were consulted by the agent in August of 2024, in regards to the proposed vehicular access driveway for the Dairy which will impact on where Footpath PP71/9 junctions with Footpath PP71/8. The agent confirmed that they were not looking to impede pedestrian access however they enquired whether a gate or form of chicane was needed to ensure people stop before crossing, however we advised that given the width of the public footpath and the visibility of the existing track and proposed driveway from the public footpath, we do not consider that an additional gate or type of chicane would be required at this location. No objections subject to the proposed development subject to an informative relating to working proximity to the public footpath.*

The development is not considered to have a detrimental impact on the area in regard to parking and access and is considered to align with Policies 59 and 60 of LDP2.

3.6 Surface Water Drainage:

- 67. 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.
- 68. PCC Civil engineering section were consulted on the application and noted that the consultation documents indicate that surface water will be disposed of by means of soakaway and attenuation. This is deemed a suitable method for surface water disposal dependent on satisfactory ground conditions and percolation results. A detailed drainage scheme has been submitted as part of the planning application which can form the basis of the SAB application. No SAB application has been received to date.
- 69. Via consultation Dwr Cymru/Welsh Water advised that as of 7th January 2019, the proposed development is subject to Schedule 3 of the Flood and Water Management Act 2010. The development therefore requires approval of Sustainable Drainage

Systems (SuDS) features, in accordance with the 'Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems'. Dwr Cymru/Welsh Water have no objection to the proposals for disposal of surface water flows into a soakaway, in principle, subject to consultation and agreement with the regulatory body or riparian owner of this system.

70. Subject to a condition, the proposal is acceptable in terms of Policy 32 of LDP2 and TAN 15.

3.7 Foul water:

71. The development proposes to discharge foul and surface water flows to a package treatment plant and soakaways respectively. Details have been provided of the package treatment plant. The use of a package treatment plant is considered acceptable in this location due to the distance and impracticality of connecting to mains. This accords with the requirements of Welsh Government Circular 008/2018.
72. Dwr Cymru/Welsh Water were consulted on the application and noted the following:
73. *'Since the proposal intends utilising an alternative to mains drainage for foul water, we would advise that the applicant seek advice from Natural Resources Wales and/or the Building Regulations Authority as the regulatory body for this method of drainage. Should circumstances change and a connection to the public sewerage system is preferred, we must be re-consulted on this application.'*
74. Dwr Cymru/Welsh Water additionally advised that subject to planning consent advisory notes are to be included to ensure no detriment to existing residents or the environment and to Dwr Cymru Welsh Water's assets. Subject to advisory notes, the application is considered to be acceptable

4. Conclusion

75. It is considered that the proposed development will result in a benefit to the historic environment and special qualities of the National Park by ensuring the appropriate restoration and preservation of the Listed Buildings through their integration into the development to contribute to the site.
76. Although the proposal is contrary to Policy 48 of LDP2 in that a financial contribution is not being sought as part of the proposal, this is considered to be outweighed by the overall benefit of restoring these Listed Buildings which are currently on the local buildings at risk register.
77. Additionally, the restoration of the site and the surrounding woodland thought management will improve the long-term amenity and biodiversity of the site.
78. A three-year consent will be assigned to the decision to ensure that the works commence in a timely fashion due to the Listed Building at risk, and to ensure works commence prior to expiration of the extant ecological surveys.
79. 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 **three** 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). **Due to at risk nature of the Listed Buildings and to ensure works commence prior to expiration of ecological surveys.**
2. The development shall be carried out in accordance with the following approved plans and documents:
 - 1198/10 - Location Plan
 - 1198/11 - Existing stables and dairy block plan
 - 1198/12 - Existing pig sty block plan
 - 1198/13 - Existing stables and dairy floor plan
 - 1198/14 - Existing pig sty floor plan
 - 1198/15 - Existing stables elevations
 - 1198/16 - Existing dairy elevations
 - 1198/17 - Existing architectural details - stables
 - 1198/18 - Existing architectural details – dairy
 - 1198/19 - Existing architectural details - doors
 - 1198/20 - Existing architectural details – window 1
 - 1198/21 - Existing architectural details – window 2
 - 1198/22 - Existing architectural details – window 3
 - 1198/23 - Existing architectural details – window 4
 - 1198/24 - Existing architectural details – window 5 & 6
 - 1198/25 - Existing pig sty elevations and sections
 - 1198/26 - Existing architectural detail – pig sty
 - 1198/35 - Proposed pig sty block plan
 - 1198/36 - Proposed pig sty floor plan
 - 1198/37A - Proposed pig sty elevations and sections
 - 1198/38 - Proposed pig sty door details
 - 1198/39 - Proposed pig sty window details
 - 1198/40 - Proposed pig sty window details
 - 1198/41/A - Proposed stables and dairy block plan
 - 1198/42/A - Proposed stable floor plan
 - 1198/43/A - Proposed dairy floor plan
 - 1198/44/A - Proposed stables and dairy elevations
 - 1198/45/A - Proposed stables and dairy sectional details
 - 1198/46 - Proposed stables door detail
 - 1198/47 - Proposed stables door detail
 - 1198/48 - Proposed stable window detail
 - 1198/49 - Proposed dairy door details
 - 1198/50 - Proposed dairy door details
 - 1198/51/A - Proposed dairy door details
 - 1198/52/A - Proposed dairy window details
 - 1198/53 - Proposed link and sun room window details
 - 1198/54/C - Species Mitigation BAT ROOST & OWL BOX DETAILS by Harries Planning Design Management
 - 1198/55 - offset owl mitigation

- 1198/56/A - external lighting
- 1198/57 - associated details
- Heritage Impact Statement
- Llwyngwair Farm Bat Report
- Structural Appraisal – Llwyngwair Farm
- Assessment and Survey for Protected Species at Llwyngwair Home Farm Newport, Pembrokeshire SA42 0LX by Landsker Ecology, V3 dated 30/07/2025
- ARW1180.01 – Tree Location Plan
- ARW1180.02 – Pig sty - Tree Location Plan
- ARW1180.03 – Stables - Tree Location Plan
- ARW1180.04 – Dairy - Tree Location Plan
- ARW1180.02 – Pig sty - Tree Location Plan - Trees to be removed
- ARW1180.03 – Stables - Tree Location Plan - Trees to be removed
- ARW1180.04 – Dairy - Tree Location Plan - Trees to be removed
- ARW1180 - Tree Survey in accordance with BS5837:2012.
- ARW1180 – Woodland management, Llwyngwair Out Buildings
- Green Infrastructure Statement

Reason: In order to be clear on the approved scheme of development in the interests of protecting visual amenity and the special qualities of the National Park. Policy: Local Development Plan 2 – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park) and 29 (Sustainable Design).

3. Prior to the commencement of works, details of materials shall be submitted and approved in writing by the local planning authority of the following:
 - Proposed roof-lights and method of fixing
 - Slates
 - Ridge tiles

Any supporting drawings will be provided at a scale of 1:10 or 1:20

Reason: To protect historic environment interests whilst enabling development. Policy: Local Development Plan 2 - Policy 8 (Special Qualities) and Planning Policy Wales (PPW12) – Chapter 6 Distinctive and Natural Places.

4. Prior to commencement of development, the result of percolation testing shall be submitted to and approved by the Local Planning Authority to ensure that the proposed drainage can be implemented. If the results determine that the proposed SuDS system will not work, a revised drainage strategy will also need to be submitted and approved. Such scheme as is approved shall be implemented and retained thereafter.

Reason: In order to ensure the scheme does not cause surface water flooding and in accord with Schedule 3 of the Flood and Water Management Act 2010

5. No development shall take place until a qualified and competent contractor/ archaeologist has submitted a written scheme of investigation (WSI) for approval in writing by the local planning authority. This WSI will include a Level 3 Survey (to be undertaken prior to commencement of works) and will describe the different stages of the work and demonstrate that it has been fully resourced and given adequate time. On behalf of the local planning authority, their archaeological advisors (Heneb TTFWA - DM) will monitor all aspects of this work through to the final discharging of the condition. This work will not be deemed complete until all aspects of the WSI have been addressed and the final report submitted and approved.

Reason: To protect historic environment interests whilst enabling development

6. In the first available planting season following approval, planting must be implemented according to:
- Green Infrastructure Statement
 - 1198 57 – Typical Details
 - 1198 41 – Stables/Dairy Block Plan
 - 1198 36 - Pig styre Proposed Floor Plan

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 the LPA.

Reason: To prevent detrimental impact to trees, hedges and other landscape features which contribute to the amenity, landscape & biodiversity of the site and surrounding area. 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 12 – Biodiversity, Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009), Technical Advice Note (TAN) 10: Tree Preservation Orders (1997)

7. All retained trees, hedgebanks and hedge boundary features and/or any trees whose canopies overhang the site shall be protected by the duration of the development (in accordance with **BS5837: 2012 ‘Trees in relation to design, demolition, and construction – Recommendations’**). The type and position to be agreed with this authority prior to commencement. The protection measures shall be implemented prior to any equipment, machinery or materials are brought onto the site for the purposes of the development, and shall be maintained until all equipment, machinery and surplus materials have been removed from the site. Nothing shall be stored or placed within any protection area, and the ground levels within those areas shall not be altered, nor shall any excavation (in relation to connecting to existing infrastructure) be made, without the prior written consent of the local planning authority. No works to trees will be carried out without prior approval from this authority.

Reason: To prevent detrimental impact to trees, hedges and other landscape features which contribute to the amenity, landscape & biodiversity of the site and surrounding area. 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 12 – Biodiversity, Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009), Technical Advice Note (TAN) 10: Tree Preservation Orders (1997)

8. A landscape management plan, including management responsibilities and maintenance schedules for all landscaped areas, shall be submitted to and approved in writing by the local planning authority prior to the occupation of any of the dwellings on the site. Details will be provided clarifying that any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species. The landscape management plan shall be carried out as approved. 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

surrounding area. 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), Technical Advice Note (TAN) 10: Tree Preservation Orders

9. Prior to the erection of any additional external lighting on the approved site a light mitigation strategy, including measures to reduce light spillage onto foraging habitats for bats shall be submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.
Reason: To ensure that animal and plant species and habitats listed under the Conservation of Habitats and Species Regulations 2010 are adequately protected, and to protect and enhance the character and appearance of the site and its setting within the Pembrokeshire Coast National Park. Policy: Local Development Plan 2 - Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 12 (Local Areas of Nature Conservation or Sites of Geological Interest) and 14 (Conservation of the Pembrokeshire Coast National Park).
10. The foul drainage scheme set out within the approved plans shall be implemented prior to the occupation of the buildings and retained for the lifetime of the development.
Reason: In order to protect the natural environment. Local Development Plan 2- Policies: 1 (National Park Purposes and Duty), 8 (Special Qualities).
11. The consent hereby granted does not allow for any demolition other than that specifically identified within the Structural Report (**Structural Appraisal Report Traditional Stone Barns Adjacent to Llwyngwair Farm, Newport, Pembrokeshire.**) Any further demolition will require express consent prior to works commencing and could result in the loss of the planning permission.
Reason: For the avoidance of doubt and in accord with Policy 7 of the Pembrokeshire Coast National Park Local Development Plan.'
12. All windows, doors, barge boards, fascias and soffits shall be retained in timber in perpetuity.
Reason: To ensure a satisfactory standards of external appearance and to protect the setting of the Listed Buildings. Local Development Plan 2 – Policies 29 (Sustainable Design).
13. The external roof surfaces shown as natural slate on the plans shall be retained as such in perpetuity.
Reason: To ensure a satisfactory standards of external appearance and to protect the setting of the Listed Buildings. Local Development Plan 2 – Policies 29 (Sustainable Design).
14. Notwithstanding the provisions of schedule 2, part 1, class E of the Town and Country Planning (General Permitted Development) Order 1995 (as amended for Wales) (or any order revoking and re-enacting that order with or without modification), no buildings shall be erected other than those expressly authorised by this permission and shown on the approved plans.
Reason: To protect the character and appearance of the building and its setting and the amenity and appearance of the Pembrokeshire Coast National Park. Policy: Local Development Plan 2 – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities) and 14 (Conservation of the Pembrokeshire Coast National Park).

15. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (as amended for Wales) (or any order revoking and reenacting that Order with or without modification), no fences, gates or walls shall be erected within the curtilage of any dwelling house forward of the principle elevation of that dwelling house.

Reason: To protect the character and appearance of the building and its setting and the amenity and appearance of the Pembrokeshire Coast National Park. Policy: Local Development Plan 2 – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities) and 14 (Conservation of the Pembrokeshire Coast National Park).

6. Informatives

Heneb (WSI)

It is anticipated that the written scheme (WSI) would need to consider the following.

1. The presentation of a written scheme of investigation, prepared for the applicant by a qualified archaeological contractor. This document will need to be approved in writing by your Authority before development commences.
2. The document should provide specific information on the scope of the work, the methodologies and standards to be applied, and the name of the personnel selected to carry out this work. In addition to the buried resource this should also consider an appropriate programme of building recording.
3. The Written Scheme should specify archaeological monitoring arrangements with Heneb – The Trust for Welsh Archaeology (Development Management), the archaeological advisors to the planning authority.
4. A report will need to be produced on the results of the work.
5. The applicant is strongly advised to consider contingency arrangements in the event of the unexpected discovery of significant archaeological material.

Wales and West utilities

Our records show those pipes owned by Wales & West Utilities (WWU) in its role as a Licensed Gas Transporter (GT). Service pipes, valves, syphons, stub connections, etc. may not be shown but their presence should be anticipated. No warranties are therefore given in respect of it. They also provide indications of gas pipes owned by other GTs, or otherwise privately owned, which may be present in this area. This information is not information of WWU and WWU is unable to verify this information or to confirm whether it is accurate or complete.

Public rights of way:

Subject to approval, should the applicant wish to temporarily close public footpath PP71/9 during the groundwork on the line of the path, then they should provide sufficient notice (4 weeks) to the National Park Authority should the requisite public rights of way temporary closure notice for works be needed. The following points are to be adhered to throughout the development:

- The public right of way must not be obstructed and remain available for use at all times.
- The safety of members of the public using the public right of way must be ensured at all times.
- There must be no diminution to the width of the public right of way.
- No building materials should be stored on the public right of way.
- No damage is to be caused to the surface of the public right of way.
- No barriers are to be placed over the public right of way, either of a temporary or

- permanent nature.

PCC Civils

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

Please see www.pembrokeshire.gov.uk/planning-contacts/sustainable-drainage-approving-bodysab for more information as required to meet Schedule 3 of the Flood and Water Management Act 2010

NRW

Protected species

We note that the bat survey report has identified that the application site supports day and night roosts of greater horseshoe, lesser horseshoe, Natterer's, whiskered/Brandt's, common pipistrelle, and soprano pipistrelle bats. Some winter use of the site by horseshoe bats was also evidenced.

Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended). Where bats are present and a development proposal is likely to contravene the legal protection, they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three tests set out in the Regulations (Please also refer to Paragraph 6.3.7 of Technical Advice Note 5: Nature Conservation and Planning).

Please note, for the purposes of providing advice at the planning application stage, our comments are limited to the test relating to "demonstration of no detriment to the maintenance of the favourable conservation status of European protected species." We consider that the above report and drawing provide an adequate basis upon which to consider the potential impacts of the scheme on this species and inform the decision-making process.

We also advise that the works are carried out under licence. We refer you to the Chief Planning Officer's letter dated 1 March 2018 which advises Local Planning Authorities to attach an informative regarding licence requirements to all consents and notices where European Protected Species are likely to be present on site.

Please note, any changes to plans between planning consent and the licence application may affect the outcome of a licence application.

All British bat species and dormice, as well as their breeding sites and resting places, are protected under the Conservation of Habitats and Species Regulations 2017 (as amended). Where these species are present and where a development proposal is considered likely to contravene the legal protection they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three requirements set out in the legislation. A licence may only be authorised if:

- The proposed works to be authorised satisfy an appropriate derogation purpose, which in the case of development are for the purposes of preserving public health or safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment.
- There is no satisfactory alternative; and
- The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

These requirements are translated into planning policy through Planning Policy Wales

(PPW) Edition 12 February 2024, and Technical Advice Note (TAN) 5, Nature Conservation and Planning (September 2009). To avoid developments with planning permission subsequently not being granted a licence, the planning authority should take them into account when considering development proposals where a European Protected Species is present.

Dormice

We note that the 'Assessment and Survey for Protected Species' states 'In the absence of dedicated surveys for other species/groups, presence is assumed (reptiles, amphibians and other small mammals including dormice)'. We are aware that there are dormice records within 2km of the site and that Cockshut wood immediately adjacent to the site is identified as restored ancient woodland. We note that the pigsty site is extremely overgrown and that over the whole site the tree plan has identified over 70 trees proposed for removal under the application. No further details have been provided indicating how much habitat will need to be removed and its suitability to support dormice.

Therefore, we advise that you consult your in-house ecologist to determine whether it is considered that dormice surveys are required or an assumed presence is acceptable. If surveys are advised and confirm that dormice are present and likely to be affected, or if assumed presence is acceptable, the application should include a mitigation strategy setting out details of all the mitigation that will be put in place to mitigate and/or compensate the anticipated impacts

Birds - Schedule 1 species

Barn owls are listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended); the birds, their nests, eggs and young are fully protected at all times throughout the UK. It is also an offence to intentionally or recklessly disturb barn owls at an active nest site with eggs or young or before eggs are laid, or to disturb the dependent young.

Ancient woodland

The proposed development is adjacent to an area of ancient semi natural woodland. The proposal should ensure appropriate measures are in place to protect the trees and to avoid losses or damage. Please review the following link which considers proposals affecting ancient woodland:

- Natural Resources Wales / Advice to planning authorities considering proposal affecting ancient woodland.

Please also refer the applicant to the following link which provides advice on, 'how to avoid or reduce effects of a development on ancient woodland':

- Natural Resources Wales / How to avoid or reduce effects of a development on ancient woodland.

Other Matters

NRW advise that where there is the potential for the proposed development to affect other environmental interests that are not included on this list, it is the responsibility of the applicant to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our website for further details.

Advice for the Developer

Due to the proximity of the site to watercourses, all works at the site must be carried out in accordance with Guidance for Pollution Prevention (GPP) 5: Works and maintenance in or near water, and GPP 6: Working on construction and demolition sites, which are available on the NetRegs website.

Dwr Cymru / Welsh Water:

The applicant may need to apply to Dwr Cymru / Welsh Water for any connection to the public sewer under S106 of the Water Industry Act 1991. If the connection to the public sewer network is either via a lateral drain (i.e. a drain which extends beyond the connecting property boundary) or via a new sewer (i.e. serves more than one property), it is now a mandatory requirement to first enter into a Section 104 Adoption Agreement (Water Industry Act 1991). The design of the sewers and lateral drains must also conform to the Welsh Ministers Standards for Gravity Foul Sewers and Lateral Drains, and conform with the publication "Sewers for Adoption"- 7th Edition. Further information can be obtained via the Developer Services pages of www.dwrcymru.com.

The applicant is also advised that some public sewers and lateral drains may not be recorded on our maps of public sewers because they were originally privately owned and were transferred into public ownership by nature of the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011. The presence of such assets may affect the proposal. In order to assist us in dealing with the proposal the applicant may contact Dwr Cymru Welsh Water on 0800 085 3968 to establish the location and status of the apparatus. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

The planning permission hereby granted does not extend any rights to carry out any works to the public sewerage or water supply systems without first having obtained the necessary permissions required by the Water industries Act 1991. Any alterations to existing premises resulting in the creation of additional premises or merging of existing premises must also be constructed so that each is separately connected to the Company's water main and can be separately metered. Please contact our new connections team on 0800 917 2652 for further information on water & sewerage connections.

In accordance with Planning Policy Wales (Edition 12) and Technical Advice Note 12 (Design), the applicant is advised to take a sustainable approach in considering water supply in new development proposals, including utilising approaches that improve water efficiency and reduce water consumption. We would recommend that the applicant liaises with the relevant Local Authority Building Control department to discuss their water efficiency requirements. Should the proposal alter during the course of the application process Dwr Cymru / Welsh Water are to be consulted and reserve the right to make new representation.