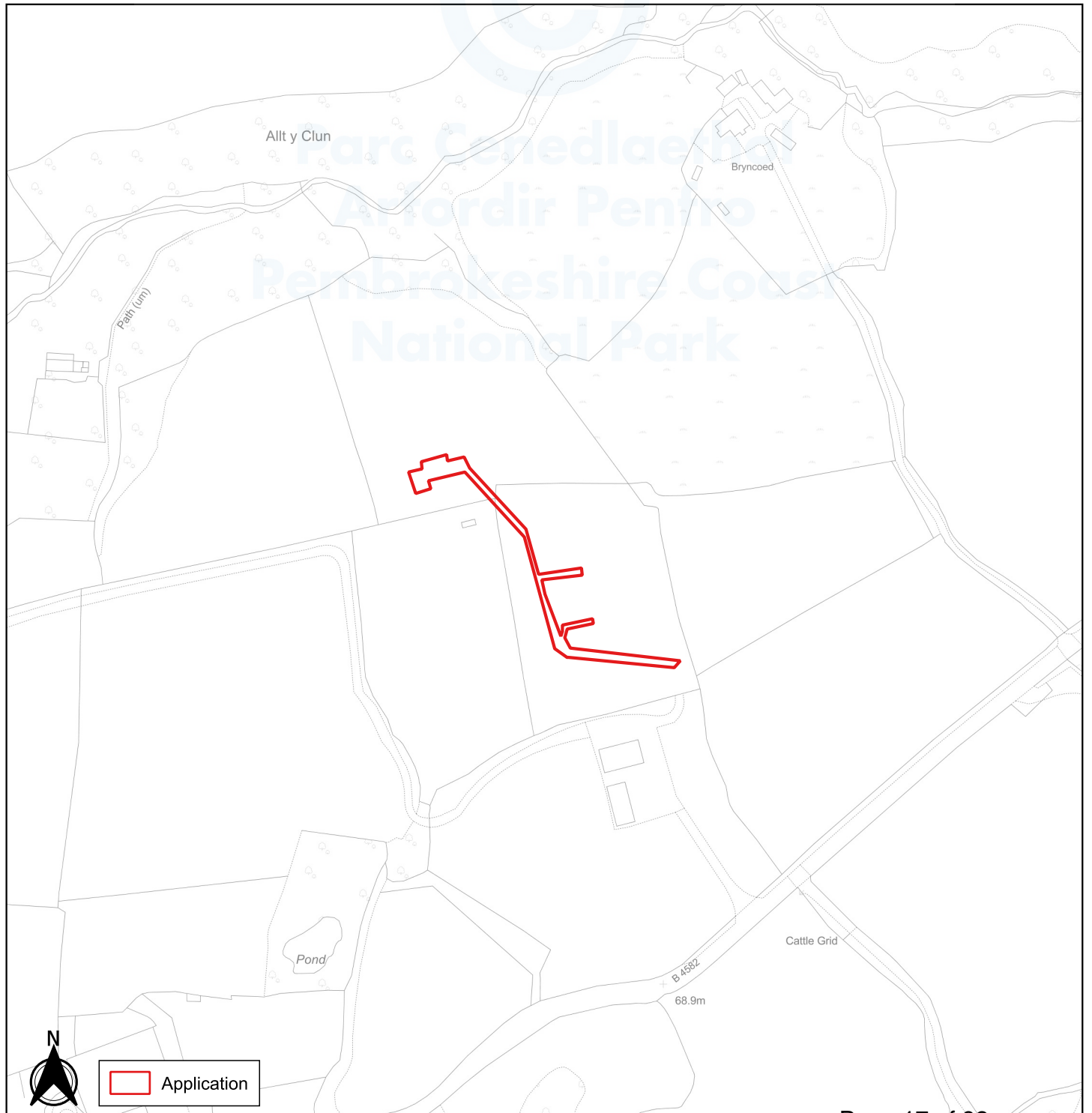
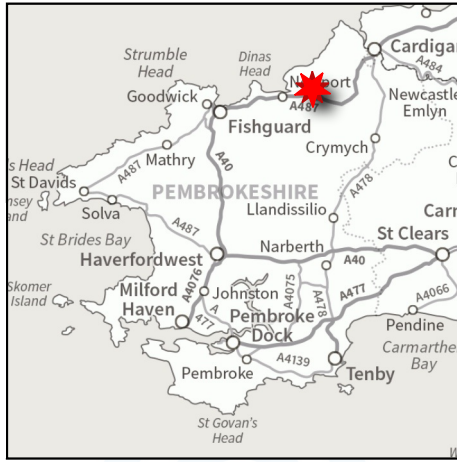





Parc Cenedlaethol
Arfordir Penfro
Pembrokeshire Coast
National Park

Graddfa/Scale: 1:2,500



 Application

PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY DELEGATED DECISION REPORT



Ref No: NP/25/0616/FUL

Proposal: Proposed rural enterprise dwelling, track extension, foul drainage system and associated works

Site Location: Eithin Farm, Felindre Farchog, Crymych, Pembrokeshire, SA41 3XW

Recommendation: **Approve**, subject to conditions

This application is being presented to the Development Management Committee in accordance with the scheme of delegation as the Community Council have objected to the application raising material planning matters, contrary to the Officer recommendation for approval.

Summary:

This application seeks consent for a rural enterprise dwelling, a track extension, private foul drainage system and associated works. A rural enterprise dwelling appraisal has been received with the application which sets out the reasons for the requirement for the dwelling. The applicants currently run a successful horticultural business, which continues to grow, with more demand for produce. The Authority has consulted its Agricultural advisor in relation to whether the information submitted is sufficient to pass the tests set out in Technical Advice Note 6 – Planning for Sustainable Rural Communities. It is deemed that the proposal satisfies the tests, and that there is a genuine need for the dwelling.

It is considered that the siting of the dwelling is acceptable. It is to be located on Grade 3b Best and Most Versatile Agricultural land, and as such, there would be no loss of the highest graded land (Grades 1, 2 and 3A).

An objection has been received from the Community Council which states that the proposed site should be closer to the sheds, and that the area designated for future seasonal agricultural workers (as shown on the Appendix Master Plan) would be more appropriate for a dwelling. However, it is not considered that the proposed development would harm the special qualities of this area of the National Park, nor is it deemed that it would cause unacceptable adverse impacts to amenity, either visual or residential.

Overall, the proposal is deemed to be in accordance with local and national planning policy and guidance. A recommendation to grant permission is made, subject to suitably worded conditions.

The application documents can be viewed here:

[Citizen Portal Planning - application details](#)

Consultee Response

- **Nevern Community Council:** Object – the living accommodation is supposed to be part of the business, it needs to be closer to the sheds, making the whole enterprise more aesthetically pleasing. The area designated for future seasonal agricultural workers would be an areas that would be more appropriate for a traditional cottage. A restriction on the house, a tied house needs to be considered.
- **PCC Drainage Engineers:** SAB approval required

- **Highways Authority:** No objections
- **Heneb – The Trust for Welsh Archaeology:** No comments received
- **Cadw:** No comments received
- **Planning Ecologist:** No objections – development must proceed in accordance with the GI statement and Ecology report
- **Natural Resources Wales:** No comments to make

It should be noted that amended information was received in relation to the proposed foul water system. As a result, the community council, NRW, PCNPA Ecologist and PCC Drainage Team were reconsulted. No updated responses have been received from the PCC Drainage Team, nor the Community Council at the time of writing, a verbal update will be provided at the meeting.

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*.

A number of representations have been received, both in support of and in opposition to the proposal. The main points raised in support of the development include:

- It would be beneficial for the applicants to live at the farm, reducing their carbon footprint and providing a great asset to the area
- Supporting small-scale organic horticulture aligns with the Well-Being of Future Generations Act
- Local food production must be supported
- The enterprise provides clear benefits to the local community through sustainable food production, allowing the applicants to live on site would support the long-term viability of this and reduce unnecessary travel
- Living on site when running a business such as this is essential
- Permission should be granted as it is in keeping with West Wales traditions to be a place of family scale farming and food production
- The business contributes to supporting the local economy by creating employment
- The farm is an important part of the local community
- The enterprise will promote sustainable practices that protect biodiversity, enhance soil health and respect the cultural and environmental heritage of the National Park
- The enterprise will provide educational and outreach opportunities

The main points raised in opposition to the proposal include:

- The discrepancy in relation to the foul water disposal method
- Potential for rainfall to overwhelm the proposed reed bed and result in pollution of ponds
- The application has nothing to do with the new current business.

It should be noted that the proposed foul water disposal system has been confirmed as a package treatment plant. It should also be noted that permission will be required from the SAB approving body for the system, and that the capacity / suitability of the reed bed will be assessed as part of this. This is discussed in Sections 3.6 and 3.8 of the report.

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 43 (Employment Sites and Live Work Units (Strategy Policy))
- 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:

- TAN 5 – Nature Conservation and Planning
- TAN 6 – Planning for Sustainable Rural Communities

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 - Biodiversity
- SPG - Landscape
- SPG - Seascapes

- SPG - Sustainable Design and Development

Constraints

- Recreation Character Areas
- Landscape Character Area
- Affordable Housing Submarkets.

Officer's Appraisal

The site in question is located approximately 600m north-east of Nevern, and approximately 5.5 km south of Glanrhyd. The land is currently being used in connection with an established horticultural business. To the south-east of the application site, there are currently 8 polytunnels sited in connection with the business.

The site is surrounded by fields to all directions, with hedge banks and mature trees forming the southern and western boundaries.

Currently, the vehicular access is limited to the polytunnels area. To the south of the application site are two agricultural buildings.

1. Site and Proposed Development

The proposal comprises:

- Construction of a rural enterprise dwelling
- Installation of foul drainage system
- Construction of new access track

2. Relevant Planning History

- NP/25/0659/FUL – Erection of 2 polytunnels – Approved
- NP/23/0594/FUL – Full planning permission for 3 x polytunnels for agricultural use – Approved
- NP/21/0819/FUL – Full planning permission for 5 x polytunnels, tracks, yard, new access, drainage works including pond and associated works for agricultural use – Approved
- NP/21/0515/FUL - Full Planning permission for 5x polytunnels, tracks, yard, new access, drainage works including pond and associated development for agricultural use - Refused

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 Best and Most Versatile Agricultural Land
- 3.8 Foul Water Disposal

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. This application proposed a rural enterprise dwelling in association with an established horticultural business. It is also proposed to create a new access track and install a new foul drainage system consisting of a package treatment plant and reed bed.
6. The site is outside of any centre, or rural centre boundary and is therefore in the countryside. As such, Policy 7 (Countryside) of the Local Development Plan 2 is applicable. Policy 7 lists the type of developments that are considered to be acceptable within countryside locations and include criterion a) – rural enterprise dwelling.
7. Planning Policy Wales 12 states that:

"The purpose of 'rural enterprise dwellings' is to enable rural enterprise workers to live at or close to their place of work, including encouraging younger people to manage farm businesses and supporting the diversification of established farms. Rural enterprise dwellings represent one of the few circumstances in which isolated new residential development in the open countryside may be justified.

All applications for new rural enterprise dwelling should be carefully examined to ensure that there is a genuine need" (paras 4.2.37 – 4.2.38)

8. Technical Advice Note 6 (Planning for Sustainable Rural Communities) sets out a number of tests that a rural enterprise must fulfil before permission may be granted for

a new dwelling. These are:

- a) There is a clearly established existing functional need (the functional need test),
- b) The need relates to a full-time worker, and does not relate to a part-time requirement (the time test),
- c) The enterprise concerned has been established for at least three years, profitable for at least one of them and both the enterprise and the business need for the job is currently financially sound; and has a clear prospect of remaining so (the financial test);
- d) the functional need could not be fulfilled by another dwelling or by converting an existing suitable building already on the land holding comprising the enterprise, or any other accommodation in the locality which is suitable and available for occupation by the worker concerned; and
- e) other normal planning requirements, for example, siting and access are satisfied.

9. Each test within TAN 6 is considered in turn:

Functional Test

The land holding at Eithin Farm extends to approximately 10.1a (25 acres) of owned and productive agricultural horticultural land, and additional 2.83 ha (7 acres) of adjoining land will be rented by the applicants which would bring an extra 1.7 ha into horticultural use.

10. In order to ensure adequate supervision for the enterprise, the applicant considers a rural worker's dwelling is essential. PCNPA's independent agricultural advisor considers that the essential need in connection with a horticultural business, in particular, the management of polytunnels or glasshouses, arises from the sowing, growing and caring for the crops, and under certain weather conditions such as frosts or periods of extended low temperatures. This would require the operation of manual heating systems when they are contained within the structures or periods of extreme heat the operation of any ventilation systems available in order to provide a consistent growing environment for the crops.
11. Such horticultural businesses utilise irrigation systems incorporated within the buildings. Any failure in the automatic irrigation system can be damaging to plants which require a constant and regular water supply for growth and development. Any failure of such systems can lead to reduced or stunted growth in plants, and a reduction of quality, which can cause financial loss. A failure in automated ventilation systems can also have the same impact.
12. Adverse weather conditions, including frosts in spring and early summer could damage plants within unheated polytunnels, and the need to ensure plants are covered with frost covers. High winds and snowfalls can lead to polytunnels sustaining damage, exposing susceptible plants to damage.
13. PCNPA's agricultural advisor notes that alarm systems are available, which can warn the grower of any automatic mechanical failures or sudden drops in temperature. However, these systems only provide warnings, and do not rectify the issue. In the time taken to travel to the site, the problem could be considerable with an inevitable loss of plants.

14. In the case of Eithin Farm, it is considered that the essential need arises from:
 - Threat to infrastructure and crops due to adverse weather conditions
 - Polytunnel ventilation and humidity management;
 - Seedling production;
 - Crop covers and crop pests;
 - Slug control;
 - Harvesting high value sensitive crops;
 - Customer collections;
 - Weeding and cultivations
 - Knock-on effects of emergency breakdowns and responses during working day
 - Irrigation of newly planted delicate crops
15. The Rural Enterprise Dwelling Appraisal (REDA) submitted with the application details instances where the applicants and/or staff have needed to respond to weather conditions, pests, unusual orders or collections and livestock from neighbouring farms entering the site.
16. Labour calculations have been included within the REDA based on the hours worked by the applicant and additional staff members with the applicant's working hours totalling 2,553.5 (including out of hours), which is the equivalent of 1.16 full-time workers.
17. Based upon the evidence supplied in relation to hours worked, PCNPA agricultural advisor considers that there is an essential need for a full-time worker to reside on site. Therefore, the Authority is satisfied that the functional need and time tests have been met.
18. **Financial Test**

Financial statements have been provided by the applicants, who trade as Southern Roots Organics for the years ending March 2024 (including comparison year ending March 2023) and March 2025. A three-year business plan has also been provided, which covers the period between 2026-2029.
19. The details provided demonstrate that the business has been trading for over three years and is able to support the labour costs for a full-time worker based on the actual and the projected profits. As such, the Authority is satisfied that the financial test has been met.
20. **The Other dwelling Test**

The REDA notes that there is no dwelling on the application site, neither are traditional or other 'appropriate' buildings available for conversion to provide the rural enterprise dwelling.
21. There are also details within the REDA in relation to properties for sale within the locality of the site. These properties are considered unsuitable for the applicants' personal requirements, or, are not affordable for a rural worker.
22. Whilst the search did identify two properties within 1 mile of the application site, one of which would have been within the rural worker's affordability, PCNPA's agricultural

advisor has discounted these properties as it is located 0.99 miles from the application site, and as such does not need the accepted essential need.

23. When considered as a whole, and following the agricultural advisor's assessment of the REDA in relation to the tests within TAN 6, officer as satisfied that sufficient information has been submitted to demonstrate compliance with these tests, and that the principle of a rural enterprise dwelling in this location is acceptable, and therefore, is in accordance with the requirements of Policy 7 of the LDP2.
24. As discussed later in this report, the 'other normal planning requirements' as referred to in TAN 6 are deemed to be satisfied. The proposal is therefore acceptable in policy terms.

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

25. 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.
26. 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.
27. Policy 29 (Sustainable Design) of LDP2 requires all development proposals to be well designed in terms of place and local distinctiveness.
28. The proposal is to construct a rural enterprise dwelling, create a new access track, and install a new foul water disposal system.
29. The site is located in the Cemaes Head Landscape Character Area (No 25). The Authority's Supplementary Planning Guidance on Landscape lists this area's special qualities. They include:
 - A predominantly open, windswept farmland landscape, with traditional hedgebanks as the dominant boundary feature, imparting a strong texture to the landscape, and providing evidence of long associations with pastoral agriculture and the sheltering of livestock from the prevailing winds off the sea;
 - Frequent views down to the sea and unspoilt coastal cliffs from exposed sections of minor roads along high ground, where bordering hedge banks allow views from the road
 - Impressive views across a large tract of land towards Mynydd Preseli and Mynydd Carningli, which form the southern skyline and contribute to the strong sense of place
 - Long framed views along roads formed by steep hedge banks to either side are also a local characteristic here
 - Strong feelings of remoteness, with a sparse settlement pattern compromised largely of scattered farmsteads and isolated hamlets, and a notable absence of settlements
 - Sand dunes, sandy beaches and mudflats to the western side of the mouth of the Teifi estuary at Poppit Sands

- The wealth of archaeological and historical sites are of national importance in Wales. These include a small part of the Lower Teifi Valley Registered Landscape of Special Historic Interest between Cemaes Head and the Park boundary near Poppit.

30. As the site is located within a patchwork of fields, is surrounded by trees and hedgerows, and is located approximately 140m from the public highway, it is not considered that the property would result in significant visual intrusion. Additionally, as the wider site is surrounded by woodland to the north, the property and associated works would not be highly visible within the immediate landscape.
31. Further, given that the business is well established and there are currently 8 polytunnels on site, with another two having recently been granted permission, a dwelling to accommodate the applicants would not appear as an alien form of development. Given that traditionally, an agricultural worker would live on site. In addition, the proposed dwelling would be closely linked to the polytunnels in terms of proximity, which would avoid the sprawl of built form/ structures. Whilst an objection from the Community Council has been received in relation to the proposed dwelling needing to be closer to the sheds, the growing of the plants takes place within the polytunnels, rather than the sheds towards the south of the holding. Therefore, the dwelling would be more beneficial in its currently-proposed location as opposed to being sited closer to the sheds.
32. The design of the property is simple, and it is single storey only. This, combined with the fact that the site is already partly bound by existing hedging, with additional hedgerow planting proposed, it is not considered that the proposed development would cause a significant visual intrusion, nor would it be deemed as being sited insensitively or unsympathetically.
33. The materials to be used in the construction of the property would include timber cladding, onduline sheeting and timber door / window frames. These are considered to be suitable materials for a rural development. A condition requiring the cladding to be natural, untreated timber and the roof to be either grey or black in colour will be imposed to ensure a satisfactory appearance.
34. As the proposed development would not have a significant impact upon the farmland landscape and hedge boundaries and would introduce additional planting in the form of hedge banks to the north and eastern boundaries, and an apple tree orchard to the north, it is not considered that the special qualities of this area would be harmed.

3.3 Amenity and Privacy:

35. 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.

36. There are no concerns in relation to the impact upon residential by virtue of overlooking or overshadowing since the nearest residential dwelling to the site is approximately 200m to the south-west.
37. It is not deemed that the proposed dwelling, track and foul water system would be of a scale incompatible with their surroundings given that the property itself is of a simple design. As noted in paragraph 32 above, it is not considered that the proposal would result in visual intrusion.
38. There are no concerns in relation to an unacceptable adverse effect due to traffic, noise, odour or light.
39. Overall, the proposal is considered to be in accordance within Policy 30 of the LDP2.

3.4 Biodiversity, Green Infrastructure & Landscaping and Protected Sites

Biodiversity impacts

40. 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.
41. The Planning Ecologist has been consulted on this application. Initially, an update to the preliminary ecological survey that was carried out in 2021 was requested. However, a site visit was carried out and there were no signs of change in relation to the protected species on site. As such, it is considered that the works can proceed, subject to a condition of adherence to the green infrastructure statement, and the ecological report already carried out.

Net Benefit for Biodiversity and Green Infrastructure

42. 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 wellbeing.
43. 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.
44. 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.
45. A green infrastructure statement has been received with the application. It states that the site is part of a semi-improved grassland field and that there are mature trees to all

boundaries. Aside from a section of grass to facilitate the formation of the proposed track, no green features are to be removed from the site. Initially, the planning ecologist was concerned that a section of hedge bank would need to be removed, however, following a site visit, it was confirmed that this is not the case.

46. As part of the enhancement, it is proposed to plant native hedge banks along the northern and eastern boundaries of the application site. It is also proposed to plant an apple orchard to the north of the site, the species being *malus domestica*. These are considered to be suitable green infrastructure enhancements, and it is considered that the proposal would result in a net benefit for biodiversity.

Protected Sites

Sites of Special Scientific Interest (SSSI)

47. The *Wildlife and Countryside Act 1981 (as amended)* places a duty on public authorities in exercising their functions, so far as this is likely to affect the flora, fauna, geological or physiographical features of a Site of Special Scientific Interest (SSSI), to take reasonable steps consistent with the proper exercise of their functions to further the conservation and enhancement of those features.
48. Additionally, Paragraphs 6.4.25 & 6.4.26 of PPW12 relate to developments in or in close proximity to Sites of Special Scientific Interest (SSSI), with 6.4.26 stating that *'There is a presumption against development not within a SSSI but likely to damage SSSI. In such cases, proposals must be carefully assessed to ensure that effects on those nature conservation interests which the designation is intended to protect are carefully understood and development should be refused where there are adverse impacts on the features for which the site has been designated. International and national responsibilities and obligations for conservation should be fully met, and consistent with the objectives of the designation, statutorily designated sites should be protected from damage and deterioration, with their important features conserved and enhanced and the capacity for restoration demonstrated by and through appropriate management.'*
49. In this case the site is not on or in proximity to a SSSI and therefore no impacts on a SSSI are envisioned from the proposal.

Habitat Regulations Assessment

50. 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.
51. 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.
52. In this case the Authority has considered the proposal and considers that there is no likely significant effect on a SAC or SPA as the application site is not within close proximity to either designation.

53. Overall, the proposal is considered to be in accordance with the requirements of Policies 10 and 11 of the PCNPA LDP and compliance with the requirements of the Environment Act (Wales 2016), the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations (2017).

3.5 Access and Parking

54. 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.
55. Additionally, Policy 60 (Impacts of traffic) of LDP2 permits development where appropriate access can be achieved.
56. The Highways Authority has been consulted on this application and has noted that the access to the site is suitable, and that the current arrangement ensures that the free flow of traffic is not impeded.
57. There would be sufficient parking and turning provision to support a three-bedroomed dwelling and the layout of the site provide sufficient spaces for vehicles to manoeuvre safely within the internal site infrastructure, as well as enabling vehicles to enter and exit the site in a forward gear.
58. There are no objections in terms of safety, capacity or policy grounds, and as such, the proposal is deemed to comply with Policy 60 of the LDP2. Additionally, since the proposal would remove the need for the applicants to commute from their home to the site, it would reduce the need for travel and would therefore comply with Policy 59 of the LDP2.

3.6 Surface Water Drainage:

59. 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.
60. The Civil Engineering Team has been consulted on the submitted drainage statement, and confirm that in principle, the proposed used of water butts and ground infiltration is acceptable. Since the construction area having drainage implications exceeds 100 square metres, the approval of the SuDS Approving Body (SAB) will be required. This consent would be obtained via a separate application.
61. The applicant is aware that SAB approval is required. A condition will be imposed which requires the applicant to submit a copy of the SAB approval to the Local Planning Authority prior to the commencement of the development.

3.7 Best and Most Versatile Agricultural Land

62. Planning Policy Wales 12 (PPW12) states that agricultural land of grades 1,2, and 3a of the Agricultural Land Classification is the best and most versatile and should be conserved as a finite resource for the future. Land in grades 1,2 and 3a should only be developed if there is an overriding need for the development, or if land in lower

agricultural grades is not available.

63. In this case, the agricultural land grading is 3b. Therefore, there are no concerns in relation to the loss of best and most versatile agricultural land.

3.8 Foul water disposal

64. When the application was first submitted, it was unclear as to the proposed method of foul water disposal. Whilst the REDA referred to a package treatment plant, the drainage drawing referred to a septic tank.
65. Welsh Government Circular 008/20128 – *Planning requirement in respect of the use of private sewerage in new development, incorporating septic tanks and small sewage treatment plants* states that when considering sewerage proposals for any development, the first presumption must always be to provide a system of foul drainage discharging into the public sewer.
66. In this case, there are no public sewers into which the development can be connected. The drainage hierarchy within the Circular states that if a public sewer is not feasible, a package treatment plant should be considered. A septic tank should only be considered if neither a public sewer nor a package treatment plant is feasible.
67. Following discussions between Officers and the applicant, the private sewerage scheme has been confirmed as a package treatment plant (PTP), and the drainage plan has been amended. Natural Resources Wales have been consulted on this scheme, and do not wish to raise any comments. An informative will be attached to the decision notice which advises the applicant that it is their responsibility secure any relevant permits /consent, and this would include consent for the PTP.

4. Conclusion

68. The evidence submitted with this application, having been assessed by PCNPA's Agricultural Advisors, is sufficient to demonstrate that an essential need exists for a rural enterprise dwelling, and that the proposal meets the tests set out in TAN 6. The siting and design of the dwelling are considered acceptable with no concerns in relation to landscape impact, amenity or biodiversity. Overall, the proposal is considered to be acceptable and a recommendation to grant permission is made.
69. In reaching a recommendation, regard has been given to the requirements of the *Well Being of Future Generations (Wales) Act 2015*. It is considered that this recommendation is in accordance with the Act's sustainable development principle through its contribution towards the Welsh Ministers' well-being objective of supporting safe, cohesive and resilient communities.

5. Recommendation

APPROVE, subject to the following conditions:

1. The development shall begin no later than five years from the date of this decision.

Reason: Required to be imposed pursuant to Section 91 (1) of the *Town and Country Planning Act 1990* (as amended).

2. The development shall be carried out in accordance with the following approved plans and documents:

- Drawing Ref 001A Rev L – Location Plan – existing; received 17th November 2025
- Drawing Ref 001A Rev L - Location Plan; received 17th November 2025
- Drawing Ref 002A Rev L – Site Plan, received 26th February 2026
- Drawing Ref 002 Rev M – Drainage Site Plan, received 11th March 2026
- Drawing Ref 101 Rev J – Proposed Plans, received 31st October 2025
- Green Infrastructure Statement, received 31st October 2025
- Preliminary Ecological Survey, dated 15th April 2021

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. The foul drainage scheme set out within the approved plans (Drawing Ref 002 Rev M – Drainage Site Plan, received 11th March 2026) 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).

4. In the first available planting season following approval, planting must be implemented according to the Green Infrastructure Statement and proposed site plan (Drawing ref 002A Rev L).

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).

5. 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).

6. The development shall be carried out in line with the recommendations contained within the Preliminary Ecological Assessment (Landsker Ecology), dated 15th April 2021.

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)

7. All retained trees, hedgebanks and hedge boundary features and/or any trees whose canopies overhang the site shall be protected for the duration of the development (in accordance with **BS5837: 2012 'Trees in relation to design, demolition, and construction – Recommendations'**). 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. The occupancy of the dwelling shall be restricted to those: a) solely or mainly working or last working on a rural enterprise in the locality, or a widow, widower, or surviving civil partner of such a person, and to any resident dependants; or if it can be demonstrated that there are no such eligible occupiers, b) a person or persons who would be eligible for consideration for affordable housing under the local authority's housing policies, or a widow, widower or surviving civil partner of such a person, and to any resident dependants.

Reason: To comply with National Policy and in order to ensure an adequate supply of appropriate housing in the locality. Policy: Local Development Plan 2 – Policy 29 (Sustainable Design), Planning Policy Wales, Edition 12 section 4.2 (Housing) and Technical Advice Note 6 (Planning for Sustainable Rural Communities).

9. The cladding to be used in the construction of the rural enterprise dwelling hereby granted shall be natural, untreated timber. Details of which shall be submitted to and approved by the Local Planning Authority prior to the commencement of the development.

Reason: In order to ensure a satisfactory form of development and to protect the special qualities of the National Park. Policy: Local Development Plan 2 – Policies 1
Pembrokeshire Coast National Park Authority
Development Management Committee - 22 April 2026

(National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park) and 29 (Sustainable Design).

10. The roofing material to be used in the construction of the rural enterprise dwelling hereby granted shall be black or grey.

Reason: In order to ensure a satisfactory form of development and to protect 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).

11. Notwithstanding the provisions of Article 3 of the Town and Country Planning (General Permitted Development) Order 1995, (relating to extensions to, and changes to the external appearance of the dwelling and to development or the siting of a caravan within the curtilage of the dwellinghouse) no development of Parts 1,2 and 5 of Schedule to that Order (or any Order revoking or re-enacting that Order) shall be carried out without specific planning permission being obtained.

Reason: To preserve the character of the area. Policy: Local Development Plan 2 - Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park) and 30 (Amenity).

12. Notwithstanding the provisions of Article 3 of the Town and Country Planning (General Permitted Development) Order 1995 (or any Order revoking or re-enacting that Order) any electricity or telephone supplies to the site shall be by underground cables.

Reason: To preserve the character of the area. Policy: Local Development Plan 2 – Policies 1 (National Park Purposes and Duty) and 14 (Conservation of the Pembrokeshire Coast National Park).

6. Informatives

Protected Species

It is recommended that the applicant be informed that all British bat species are European Protected Species by virtue of their listing under Annex IV of EC Directive 92/43/EEC ('The Habitats Directive'). This Directive has been transposed into British Law under the Conservation of Habitats and Species Regulations 2017. British bats are also protected under Schedule 5 of the Wildlife and Countryside Act (1981) (as amended). 4 of 5

It is recommended that the applicant and contractors be informed of the possibility of encountering bats unexpectedly during works. If bats are encountered on site works should stop immediately an NRW should be contacted (Natural Resources Wales, - General Enquiries: enquiries@naturalresourceswales.gov.uk or 0300 065 3000 Mon-Fri, 8am - 6pm) a licence may then need to be applied for from NRW. Licences are not automatically granted by virtue of a valid planning consent and it may be possible that the necessary licence application may be refused.

SuDS Approving Body Approval

Please note that the works hereby approved will require SAB approval prior to the commencement of any works on site relating to this application.

The applicant should be made aware that if there is a breach of the requirement for SAB approval (i.e. when construction work is commenced without SAB approval); the

SAB may at any time issue an enforcement notice. The failure to obtain SAB approval may have a detrimental effect upon the future sale of the properties, which could also result in insurance applications and or flood event settlements being compromised.

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

Natural Resources Wales

The applicant should be advised that, in addition to planning permission, it is their responsibility to ensure that they secure all other permits/consents relevant to their development.