

REPORT OF THE DEVELOPMENT MANAGEMENT MANAGER ON APPEALS

The following appeals have been lodged with the Authority and the current position of each is as follows:-

<u>EC22/0088</u>	Unauthorised siting of polytunnel - Land at Llwyndrain Forest, Pentregalar, Crymych, Pembrokeshire, SA66 7SB
Type	Written Repls
Current Position	The initial documentation has been forwarded to PEDW
<u>EC23/0124</u>	Siting of touring caravan on land for residential use - Penygraig Uchaf, Cippyn, St. Dogmaels, Pembrokeshire, SA43 3LZ
Type	Written Repls
Current Position	The initial documentation has been forwarded to PEDW
<u>NP/24/0454/FUL</u>	Change of use from lifeboat storage unit to takeaway food outlet (A1) - Former Inshore Lifeboat Store, Tenby Harbour, Tenby, Pembrokeshire, SA70 7HA
Type	Written Repls
Current Position	The appeal has been allowed and a copy of the Inspectors decision is attached for your information
<u>NP/24/0602/FUL</u>	Below ground extension to an ancillary building at Sleekstone House and associated landscaping - Sleekstone, Haroldston Hill, Broad Haven, Haverfordwest, Pembrokeshire, SA62 3JP
Type	Written Repls
Current Position	The appeal has been allowed and a copy of the Inspectors decision is attached for your information
<u>NP/25/0698/TPO</u>	Removal of branch overhanging roof (TPO 98 G1) - Penybanc, 12, Catherine Street, St Davids, Haverfordwest, Pembrokeshire, SA62 6RJ
Type	Written Repls
Current Position	The initial documentation has been forwarded to PEDW
<u>NP/25/0373/FUL</u>	Siting of a Shepherds Hut within the curtilage for holiday let accommodation including creation of car parking space for one vehicle - Melrose, Cresselly, Kilgetty, Pembrokeshire, SA68 0TX
Type	Written Repls
Current Position	The initial documentation has been forwarded to PEDW

NP/25/0113/FUL Change of use of agricultural field attached to mixed usage so that we can run a secure dog exercise field business - Millcombe, Cosheston, Pembroke Dock, Pembrokeshire, SA72 4TU

Type Written Reps

Current Position The initial documentation has been forwarded to PEDW

NP/25/0085/FUL Alterations and extension of an existing property - Mor Awelon, Fort Road, Solva, Haverfordwest, Pembrokeshire, SA62 6TG

Type Written Reps

Current Position The appeal has been dismissed and a copy of the Inspectors report is attached for your information

NP/25/0632/FUL New two storey dwelling with detached garage and detached annex - Plot adjacent to Coedmor, Dinas Cross, Newport, Pembrokeshire, SA42 0XQ

Type Written Reps

Current Position The initial documentation has been forwarded to PEDW



Appeal Decision

by R H Duggan BSc (Hons) DipTP MRTPI

an Inspector appointed by the Welsh Ministers

Decision date: 13.04.2026

Appeal reference: CAS-04600-K6T4B2

Site address: The Old Lifeboat Store, Penniless Cove, Tenby Harbour, Tenby SA70 7HA

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Miss Ruby Goodrick against the decision of Pembrokeshire Coast National Park Authority.
 - The application Ref NP/24/0454/FUL, dated 19 August 2024, was refused by notice dated 5 March 2025.
 - The development proposed is described as “*Change of use from lifeboat storage unit to takeaway food outlet (A1)*”.
 - A site visit was made on 31 March 2026.
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Decision

1. The appeal is allowed and planning permission is granted for the change of use from lifeboat storage unit to takeaway food outlet (A1) at The Old Lifeboat Store, Penniless Cove, Tenby Harbour, Tenby SA70 7HA in accordance with the terms of the application Ref NP/24/0454/FUL, dated 19 August 2024, subject to the conditions set out in the annex to this decision.

Application for Costs

2. An application for costs has been submitted by Miss Ruby Goodrick against Pembrokeshire Coast National Park Authority (NPA). This application is the subject of a separate Decision.

Main Issues

3. I consider the main issues to be:
 - whether the development would be an appropriate use within this location, having regard to its location within Tenby Harbour outside Tenby town centre; and
 - the impact of the development on the character and appearance of the area, having particular regard to the special qualities of the National Park, and whether it preserves or enhances the character or appearance of Tenby Conservation Area (the Conservation Area).

Reasons

Location

4. The appeal property is the site of the former lifeboat store building located on Tenby Harbour and is accessible either from the staircase leading down to the harbour from Crackwell Street or from the eastern side of the harbour. The building is constructed from stone and has a flat roof of felt material, and there is currently a timber bi-fold door on the front elevation. The proposal comprises the change of the use of the building into a cold food takeaway.
5. Paragraph 4.3.18 of Planning Policy Wales (PPW) Edition 12 states that planning authorities should adopt a sequential approach when determining planning applications for retail and other complementary uses. It goes on to state that, by adopting a sequential approach first preference should be to locate new development within a retail and commercial centre defined in the development plan hierarchy of centres. This hierarchical approach is replicated in the Adopted Pembrokeshire Coast National Park Authority Local Development Plan 2 (LDP). Policy 56 'Retail in the National Park' identifies the need for additional retailing floor space, and this is directed to the town centre of Tenby and is identified for comparison floor space rather than convenience floor space and seeks to protect and enhance the viability, vitality and attractiveness of the retail and commercial centre of Tenby. The appeal site lies outside but very close to the designated town centre boundary.
6. Policy 2 of 'Future Wales The National Plan 2040' provides the basis for local planning authorities to support intensification in and around town centres. It states that the growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres, and that urban growth and regeneration should be based on strategic placemaking principles, which includes creating a rich mix of uses. Future Wales goes on to state that to create activity throughout the day places should have a rich mix of residential, commercial and community uses within close proximity to each other.
7. Policy 6 of Future Wales also adopts a town centre first approach, but it acknowledges that there may be a need to move away from their traditional retail roles and to re-think the future of town and city centres. It acknowledges that town centres remain important focal points of communities, but they are more than the extent of designated retail areas.
8. Although the appeal site is located just outside the town centre boundary and the proposed scheme would, therefore, be in conflict with Policy 56 of the LDP, I consider that a small scale cold food takeaway outlet in this location would not undermine the town centre of Tenby or its retail function and would not have any impact on its future viability and vitality. To the contrary, the development would complement the role of the town centre by contributing to having a mix of uses within this edge of centre location, which is encouraged within Future Wales. Indeed, I noted that there are other takeaway outlets located close by in the main part of the harbour area, and at the time of my visit, these were very busy with customers.
9. Objections have been raised by the Sailing Club and other harbour users due to the potential conflict between customers of the takeaway and members of the Tenby Sailing Club who use the space above the Mayors Slip to rig sailing dinghies; and the tractor manoeuvres related to launching from North Beach dinghy park. Objectors also state that this is also the location where other harbour users launch leisure boats and tenders, and where commercial fishing boats unload their catch, and as a result the area can be

congested, compounded by vehicles travelling to and from North Beach. In this regard, I have been referred to Policy 18 (Porthgain, Saundersfoot, Solva and Tenby Harbours) of the LDP which states that 'development within the identified harbour areas will be permitted provided that: a) it sustains harbour activities; and b) it conserves or enhances the existing character of the harbour'.

10. I saw on my site visit that the area around the appeal site and the slip way was busy with passing tourists and harbour users. In my opinion, the takeaway would serve the existing tourists that already pass the site and would not necessarily attract customers to the premises. Whilst there would be instances of queuing outside the premises at busier times I am not persuaded that this would cause conflict with other users of the harbour or cause any hazard with harbour vehicles, The Highways Authority was consulted and it confirmed that there would be no change to the current access, local highway network or to existing parking arrangements and it raised no objections to the scheme. I would also agree with the appellant that the proposed takeaway would complement the existing use of the harbour and those using the harbour.
11. Without any further evidence to substantiate the concerns of the NPA and objectors on this issue, I must conclude that the development would not cause harm to the existing users of the harbour.
12. In conclusion on this main issue, having regard to the location of the appeal site in very close proximity to the designated town centre, I consider the proposed development would not have a harmful impact on the future viability and vitality of Tenby town centre, and would not cause conflict with existing harbour activities. Therefore, the proposed development would be an appropriate use within this location, in compliance with Future Wales and Policy 18 of the LDP.

Character and Appearance

13. Policy 8 (Special Qualities) of the LDP refers to the special qualities of the National Park and lists priorities to ensure that these qualities will be protected and enhanced; and Policy 14 (Conservation of the Pembrokeshire Coast National Park) resists 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.
14. The site is located within Landscape Character Area No.2 – Tenby, the special qualities of which include: a very strong sense of place; distinctive coastal topography with an intimate association between the town and the shore; long-established historical centre; historical built features of national importance; and Tenby's Conservation Area.
15. There would be no external changes to the fabric of the building to enable the proposed development, other than the installation of a fascia sign which would be subject to a separate advertisement consent and not part of this appeal. Whilst I have noted the concerns raised by the Authority's Conservation Officer and Tenby Civic Society, as the development would make use of an existing building it would not result in any visual impact on the historic harbour area or be unsympathetically sited within this historic landscape. Cadw has also raised no objections to the development, stating that it would not have an unacceptably damaging effect upon the setting of scheduled monument PE163 Tenby Castle.
16. I have already concluded above that the development would complement the activities taking place within this working harbour and those using the harbour for other leisure activities and would not have an adverse impact on the character of the harbour area.

17. Therefore, in view of this main issue, I conclude that the proposal would not have a detrimental impact on the character and appearance of the area or on the special qualities of the National Park, and would also, therefore, preserve and enhance Tenby conservation area. To this end, the development would comply with Policies 8, 14 and 29 of the LDP.

Other Matters

18. Objectors to the proposed change of use have raised concerns regarding the impact on the living conditions and amenity of the occupants of residential properties in the area. I saw that the locality already contains a mix of uses, and these nearby uses and the pedestrian movements along surrounding roads already generate some level of noise and disturbance throughout the day and into the evening. There is already noise associated with comings and goings of deliveries and collections along neighbouring roads and within the harbour area which already create some levels of noise and traffic disturbance.

19. The NPA has not provided substantive evidence that the proposed use would give rise to adverse effects on living conditions sufficient to warrant refusal. Nevertheless, the premises would be limited to selling cold food only and have limited opening times, which means it would not generate the kind of noise, odour or late-night activity that might otherwise be of concern elsewhere in Tenby town centre. Therefore, based on the evidence before me and from what I saw, I conclude there would be no harmful effect on the living conditions of the occupants of neighbouring residential properties.

20. With regard to objections relating to increased rubbish and waste bins, this area is already popular with tourists who will generate refuse, and I saw that the area is already well served by bins. Overall, there are already existing local commercial food outlets located within Tenby Harbour that appear to be operating without any issues and the addition of another small premises would not have a detrimental impact on refuse levels in the area.

21. Issues relating to the granting of the lease and competition with other take away outlets nearby are not material planning considerations that I can take into account in the determination of this appeal.

Conditions

22. A list of suggested conditions has been put forward by the NPA. I consider these conditions, as set out in the annex to this decision, to be necessary and would satisfy the tests in Circular 16/14: The Use of Planning Conditions in Development Management. I have adjusted the wording of some of the conditions in the interest of clarity and precision. They are necessary and seek to ensure that the development avoids, or where that is not possible, mitigates as far as is reasonable, the potentially harmful effects of the scheme, alongside securing enhancements as sought by national policy. The reasons for imposing each of the recommended conditions are summarised in the schedule of conditions.

Conclusions

23. Having regard to the above and considered all other matters raised by interested parties, I conclude that the appeal should be allowed.

24. In reaching my decision, I have taken into account the requirements of sections 3 and 5 of the Well-Being of Future Generations (Wales) Act 2015. I consider that this decision is in accordance with the Act's sustainable development principle through its contribution

towards the Welsh Ministers' well-being objectives of building a stronger, greener economy as we make maximum progress towards decarbonisation, making our cities, towns and villages even better places in which to live and work and embedding our response to the climate and nature emergency in everything we do.

R.H Duggan

INSPECTOR

SCHEDULE OF CONDITIONS

- 1) The development hereby permitted shall begin not later than five years from the date of this decision.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990.

- 2) The development shall be carried out in accordance with the following approved plans and documents: Proposed Layout Plan Rev E; Flood Consequences Assessment; Green Infrastructure Statement; Green Infrastructure Statement Sketch Plan.

Reason: To ensure that the development is carried out in accordance with the approved documents, plans and drawings submitted with the application.

- 3) Prior to the commencement of development, a scheme of Ecological/Biodiversity Enhancement Measures and an Implementation Timetable shall be submitted to and approved in writing by the Local Planning Authority. The Ecological/Biodiversity Enhancement shall thereafter be undertaken in accordance with the approved scheme and Implementation Timetable and retained thereafter for the lifetime of the development.

Reason: In the interests of biodiversity and to provide a net benefit to biodiversity in accordance with Policy 9 of Future Wales.

- 4) The use hereby permitted shall not operate or be open to customers outside the following times: 10:00hrs - 17:00hrs.

Reason: To protect the living conditions of nearby residents in compliance with Local Development Plan Policy 30 (Amenity)

- 5) Prior to the commencement of development, full details of internal and external lighting shall be submitted to and approved in writing by the Local Planning Authority. Any external lighting should be low level, hooded and downward facing to avoid light spill, avoid shining directly onto features such as woodland edge and hedgerows, and should be operated on a PIR activated timer. The internal and external lighting shall thereafter be undertaken in accordance with the approved details and retained thereafter for the lifetime of the development.

Reason: To maintain the special qualities of the landscape and habitats of the National Park through the protection, creation and enhancement of links between sites and their protection for amenity, landscape and biodiversity value in compliance with Local Development Plan Policies 1 (National Park Purposes and Duty), 8 (Special Qualities),

11 (Nationally Protected Sites and Species), 30 (Amenity) and to comply with the Wildlife and Countryside Act 1981 (as amended).

- 6) The roof of the premises shall at no time be used for storage or for any other use associated with the development hereby permitted.

Reason: To protect visual amenity and the special qualities of the National Park in compliance with Local Development Plan Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park) and 29 (Sustainable Design)



Costs Decision

by R H Duggan BSc (Hons) DipTP MRTPI

an Inspector appointed by the Welsh Ministers

Decision date: 13.04.2026

Costs application in relation to Appeal Ref: CAS-04600-K6T4B2

Site address: The Old Lifeboat Store, Penniless Cove, Tenby Harbour, Tenby SA70 7HA

- The application is made under the Town and Country Planning Act 1990, sections 78, 322C and Schedule 6.
 - The application is made by Miss Ruby Goodrick for a full award of costs against Pembrokeshire Coast National Park Authority.
 - The appeal was against the refusal of planning permission for the change of use from lifeboat storage unit to takeaway food outlet (A1)
 - A site visit was made by the Inspector on 31 March 2026.
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Decision

1. The application for a full award of costs is dismissed.

The submissions for Miss Ruby Goodrick

2. The application for costs is made as the applicant incurred wasted expenses during the course of the planning application, including the preparation of a Flood Consequence Assessment (FCA), Floor Plans showing the existing site and proposed development, and submitting an application for advertisement consent. The applicant believes that these costs were unjustifiably incurred, and an award of costs is being pursued for the unwarranted expenses that were imposed throughout the planning application process.

The response by Pembrokeshire Coast National Park Authority (PCNPA)

3. The Authority maintains that the appellant's claims for costs are unfounded and unsupported by the evidence. No FCA was requested at either pre-application or validation stage, and the applicant's submission of an FCA was voluntary. The requirement for scaled floor plans is a long-established and essential validation element of the planning application process supported by legislation and national guidance. Furthermore, the Officer's suggestion to consider submitting the advertisement application alongside the full application was pragmatic and intended to avoid delays and ultimately to benefit the applicant. No unnecessary or wasted expense has been incurred by the appellant, and an award of costs is therefore not justified.

Reasons

4. Section 12 Annex 'Award of Costs' of the Development Management Manual ('the Annex') advises that, irrespective of the outcome of an appeal, costs may only be

awarded against a party who has behaved unreasonably, thereby causing the party applying for costs to incur unnecessary or wasted expense in the appeal process. In terms of the advice contained within the Annex, unreasonable behaviour can be procedural i.e. relating to the process, or substantive i.e. relating to issues of substance arising from the merits of an appeal or application. In terms of a substantive award, the types of behaviour include preventing or delaying development which should clearly be permitted, having regard to its accordance with the development plan, national policy and any other material considerations; and the failure to produce evidence to substantiate the impact of the proposal, or each reason, or proposed reason for refusal.

5. The application for costs has been made due to alleged unwarranted expenses that were imposed throughout the planning application process. The NPA's requests for scaled plans is an essential validation element of the planning application process for each local planning authority in Wales and this is supported by legislation and national guidance. As such, the NPA has not acted unreasonably in requesting this information.
6. Costs may only be awarded against a party who has behaved unreasonably, thereby causing the party applying for costs to incur unnecessary or wasted expense in the appeal process. The application for costs has not been made against the NPA on any substantive grounds. Therefore, there is no basis for me to make an award of costs in this case.
7. Based on the foregoing, I conclude that the application for an award of costs should be dismissed.

R Duggan

INSPECTOR



Appeal Decision

by Helen Smith BA(Hons) BTP MRTPI

an Inspector appointed by the Welsh Ministers

Decision date: 14/04/2026

Appeal reference: CAS-04528-V1V9V6

Site address: Sleekstone, Haroldston Hill, Broad Haven, SA62 3JP

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Mr and Mrs Walters against the decision of the Pembrokeshire Coast National Park Authority.
 - The application Ref NP/24/0602/FUL, dated 14 November 2024, was refused by notice dated 21 February 2025.
 - The development proposed is below ground extension to an ancillary building at Sleekstone House and associated landscaping.
 - A site visit was made on 26 February 2026.
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Decision

1. The appeal is allowed and planning permission is granted for below ground extension to an ancillary building at Sleekstone House and associated landscaping at Sleekstone, Haroldston Hill, Broad Haven, SA62 3JP, in accordance with the terms of the application, Ref NP/24/0602/FUL, dated 14 November 2024, subject to the conditions set out in the schedule to this decision letter.

Procedural Matters

2. In October 2024 a Certificate of Lawful Development was approved for an existing use of the appeal building as overflow accommodation (Ref: NP/24/0416/CLE). I have considered the appeal on this basis.
3. Article 26C of The Town and Country Planning (Development Management Procedure) (Wales) Order 2012 confirms that, after an appeal has been made, an application may not be varied except in relation to a correctable error which does not affect its substance. The amended proposed elevations provided at appeal showing the removal of the proposed openings in the existing building, represents a material evolution of the scheme's design. I have therefore not had regard to it and have instead determined the appeal with reference to the plans on which the Authority's decision was based.

Main Issues

4. The Authority considers that the siting and design of the proposed below ground extension would not have an unacceptable adverse effect on the qualities and special landscape and seascape character of the Pembrokeshire Coast National Park (PCNP). However, although not included in the reasons for refusal, in their appeal statement the

Authority states that there is the potential for the land remodelling to appear as an incongruous landform. However, such concerns have not been substantiated. Given the limited visibility of the basement extension, and having regard to its sympathetic design, I agree that the siting and design of the proposed extension would not adversely affect the special qualities of the PCNP. I'm also satisfied that, owing to their small scale, the associated earthworks would integrate with its surroundings.

5. The main issues are:

- whether the proposed development would result in the creation of a new dwelling in the countryside, and if so, whether it complies with national and local planning policies relating to residential development in the countryside; and
- the effect of the proposed development on light pollution, having particular regard to its location in the PCNP.

Reasons

6. The appeal site is located in the countryside, for the purposes of Policy 7 of the Pembrokeshire Coast National Park Local Development Plan 2 (LDP), where development is strictly controlled. It is located within the PCNP and the Wales Coast Path runs along its western boundary. To the north of the appeal site are some scattered dwellings.
7. The appeal relates to an outbuilding used as overflow accommodation and a store in connection with the main dwelling, Sleekstone. It comprises an open plan bedroom/living area with limited kitchen facilities, a shower room and a storage area. It is sited within the dwelling's large garden, adjacent to its access and driveway. The existing ancillary building is of a modest size, is single storey and finished with timber cladding with a raised decking area on the rear elevation.

Ancillary accommodation

8. There is no dispute that the existing use of the building for storage and overflow accommodation is ancillary and incidental to the main dwelling. The appellants state that the proposed additional accommodation is needed due to the increasing number of visits by their family, including their children and grandchildren and that it would continue to be used as an ancillary building to the main dwelling. However, the Authority contends that the proposed extension would result in the creation of an extended building in the countryside which would be capable of independent occupation as a dwelling.
9. I recognise that the proposed below ground extension would more than double the overall floorspace of the modest outbuilding. I also acknowledge that the proposed layout of the accommodation would lend itself to self-contained accommodation, given that it includes an open plan kitchenette/living area, 2 bedrooms and bathroom facilities, in addition to storage areas. Nevertheless, the proposed development would still be reliant, in part, on day-to-day facilities used by the existing dwelling, including the garden, the access, parking/turning area, electricity supply and private foul drainage arrangements. It is also clear that the development applied for is the extension of the existing ancillary building to be used in connection with the existing dwelling, and not as a separate residential unit.
10. Although the building is not physically attached to the main dwelling and is sited some distance away, as the proposed extension would be below ground and would be largely screened by the surrounding landform, views of it would be limited. Consequently, the overall appearance of the building would remain primarily as a modest outbuilding, subservient to the main dwelling. In these circumstances, given its intended use as

overflow accommodation in connection with the main dwelling, I am satisfied that the extended outbuilding would remain functionally linked and subordinate to the main dwelling and would not result in the creation of an independent dwelling.

11. Moreover, its use could be adequately controlled to prevent its future use as an independent dwelling. I note the Authority's concerns regarding the practicalities of enforcing such a condition. Nevertheless, the Welsh Government Circular 016/2014 'The Use of Planning Conditions for Development Management' includes a model condition to ensure that annexes are only used as ancillary accommodation to a main dwellinghouse in order to prevent independent occupation. While this guidance refers to annexes, the principle of controlling use through a condition to prevent independent occupation or the formation of a separate planning unit is equally applicable in this case.
12. In this regard, the Authority has drawn my attention to several appeal decisions against refusals to grant a certificate of lawful development made under section 191 of the Town and Country Planning Act 1990 (as amended) in England (APP/X1545/X/22/3313618 and APP/Z3825/X/24/3348498). These appeals were allowed due to the uses being lawful due to the passage of time. However, these do not demonstrate that such a condition would be unenforceable, just that no enforcement action was taken within the required time in those cases.
13. The Authority has also drawn my attention to a Section 78 appeal in Worcestershire (APP/J1860/W/23/3324757) for a proposed detached annex where the Inspector did not consider that a condition or a UU would prevent it from being used as an independent dwelling. However, in that case, the development had no pedestrian pathways between the host dwelling and annex, no intervisibility, the appearance of independent bungalow, a larger ground floor area than the host dwelling, and there was the potential for a separate means of vehicular access. The Inspector concluded that in those circumstances it could be easily severed from the host dwelling and therefore would be tantamount to a new dwelling in the countryside. I do not consider the circumstances to be the same and have determined the appeal on its own merits.
14. Should there be a change in the level and nature of accommodation provided beyond what is proposed, then this would be a matter of fact and degree as to whether it remained ancillary to the main dwelling at that time. I am therefore not persuaded that such a condition would not be enforceable, even if the appellant's circumstances or ownership of the appeal site changed in the future.
15. Whilst the appellants have submitted a Unilateral Undertaking (UU) requiring the use of the outbuilding be ancillary, it has not been completed. In any event, for the above reasons, I am satisfied that its use could be adequately controlled by a condition. A UU is therefore not necessary.
16. I conclude that the proposed development would not result in the creation of a new dwelling in the countryside. It therefore does not conflict with LDP Policy 7. Neither does it conflict with the sustainability objectives of the Authority's Supplementary Planning Guidance 'Sustainable Development'.
17. As I have concluded that the proposed development does not comprise a new dwelling, Policy 48 of the LDP, which seeks to ensure appropriate provision of affordable housing in the National Park, is not applicable in this case.

Light pollution

18. Policy 9 of the LDP requires proposals that are likely to result in a significant level of external artificial lighting being emitted to include a full lighting scheme. It permits proposals where, amongst other things, the lighting proposed would have no

unacceptable adverse effect on, amongst other things, the character of the area and visibility of the night sky.

19. The Authority contends that the proposal would increase light pollution which would have the potential to impact negatively on the special qualities of the PCNP. No external lighting is proposed, and any future external lighting can be controlled by a condition. No roof lights are proposed and therefore any potential increase in light pollution would be limited to horizontal emission of light from the additional openings in the existing part of the building and the proposed basement glazed openings.
20. The appellants' Lighting Technical Report assesses the impact of the potential light emission on its surroundings. It identifies the site as being in an area of low district brightness, and not in a dark or intrinsically dark lighting environment. In this context, the report demonstrates the worst-case scenario of the amount of light that would be transmitted through the building's openings to sensitive receptors, including the Coast Path. It also includes mitigation of lighting to reduce potential obtrusive light. It concludes that through the application of the lighting strategy, sensitive receptors would not be adversely affected. There is no cogent evidence before me to dispute this conclusion.
21. Furthermore, I saw that, owing to the slope of the garden and the difference in levels between the appeal site and the Coast Path, views of the basement level glazed doors would be largely screened by the intervening landform. Even if there were glimpses of light from the basement openings, they would be in the context of the surrounding light from the openings of the main house and the dwellings to the north. The proposed windows in the existing part of the building would be small and the glazed door in the rear elevation would serve a storage area where light emission from that room would likely be infrequent and viewed in the context of the surrounding dwellings described above.
22. In these circumstances, and in the absence of any evidence to the contrary, I'm satisfied that the proposed development would not result in a level of light pollution that would have an unacceptable adverse effect on the character of the area or visibility of the night sky. It would therefore not have an unacceptable impact on the special qualities of the PCNP.
23. To conclude, the proposed development, subject to a condition limiting external lighting, would not result in a harmful level of light pollution and would not have a harmful effect on the special qualities of the Pembrokeshire Coast National Park. It would therefore comply with Policy 9 of the LDP and would not conflict with the objectives of policies 1 and 8 of the LDP, which seek to conserve and enhance the natural beauty and special qualities of the PCNP.

Other Matter

24. I have no evidence to suggest that the existing private foul drainage arrangements would not be suitable to serve the proposed development. Should any alterations to the existing arrangements be required in the future, the appellant would need to ensure that any required permissions, including any permits from NRW, are sought at that time.

Conditions and Obligations

25. As I have concluded that a UU is not necessary, a condition requiring one is also unnecessary. I have amended the wording of the Authority's suggested ancillary occupation condition as any change of use to a commercial use would require planning permission. I have not attached the suggested condition to remove permitted development rights from the appeal development, since the development would not constitute a new residential unit. As there are no alterations to the existing parking arrangements and as the building would remain ancillary to the existing house, a

condition limiting the use of the parking area is unnecessary. Surface water drainage is controlled by other legislation and so a condition relating to this matter is not necessary. A condition requiring a scheme of biodiversity enhancement is necessary to comply with Policy 9 of Future Wales. In the interest of clarity, I have amended the wording of the other suggested conditions without changing their overall aim.

Conclusion

26. For the reasons set out above, and having regard to all matters raised, I conclude that the appeal should be allowed.

27. In reaching my decision, I have taken into account the requirements of sections 3 and 5 of the Well-Being of Future Generations (Wales) Act 2015. I consider that this decision is in accordance with the Act's sustainable development principle through its contribution towards one or more of the Welsh Ministers' well-being objectives.

H Smith

INSPECTOR

SCHEDULE OF CONDITIONS

- 1) The development shall begin not later than five years from the date of this decision.
Reason: To comply with Section 91 of the Town and Country Planning Act 1990.
- 2) The development shall be carried out in accordance with the following approved plans and documents:

Proposed Site Plan 094_003 Rev P1
Existing and Proposed Ground Floor Plans 094_010 Rev P1
Proposed Basement Plan 094_011 Rev P1
Existing and Proposed Roof Plans 094_012 Rev P1
Existing and Proposed Side Elevation BB 094_021 Rev P1
Existing and Proposed Side Elevation CC 094_022 Rev P1
Existing and Proposed Rear Elevation DD 094_023 Rev P1
Existing and Proposed Long Elevation 094_025 Rev P1
Existing and Proposed Front Elevation AA 094_020 Rev P1
Proposed Landscape Plan 094_005 Rev P1
Proposed Drainage Plan 094_006 Rev P1

Reason: To ensure the development is carried out in accordance with the approved plans and drawings submitted with the application.

- 3) No development shall take place until a scheme for biodiversity enhancement has been submitted to and agreed in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details and shall be retained as such for as long as the development exists.

Reason: In the interests of maintaining and enhancing biodiversity, in accordance with Future Wales Policy 9.

- 4) The building shall not be occupied at any time other than for purposes ancillary to the residential use of the dwelling known as Sleekstone.

Reason: In the interest of sustainable development and protecting the countryside from inappropriate development, in accordance with Policy 7 of the Pembrokeshire Coast National Park Local Development Plan 2.

- 5) No development shall take place until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The submitted details shall include measures to control noise emissions, dust and fine particulate material emissions, pollution prevention measures, storage of materials, and remediation of the construction area. The development shall be carried out in accordance with the approved CEMP.

Reason: In the interest of local amenity and the environment, in accordance with Policy 30 of the Pembrokeshire Coast National Park Local Development Plan 2.

- 6) All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons following the occupation of the building or the completion of the development, whichever is the sooner; and 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.

Reason: In the interests of the character and appearance of the area and the special qualities of the National Park, in accordance with policies 1, 8, 14, and 30 of the Pembrokeshire Coast National Park Local Development Plan 2.

- 7) Prior to the commencement of development, full details of the internal lighting mitigation, in accordance with the mitigation set out in the report titled 'Sleekstone Barn Technical Report' prepared by DFL, 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 and shall be retained as such for as long as the development exists.

Reason: In the interest of light pollution and the special qualities of the National Park, in accordance with policies 1, 8 and 9 of the Pembrokeshire Coast National Park Local Development Plan 2.

- 8) No external lighting shall be installed unless a scheme is first submitted to and approved in writing by the Local Planning Authority. The external lighting scheme shall include details to demonstrate:
 - zero upward light spill
 - low-intensity levels & PIR-only activation
 - timed automatic shut-off mechanisms and blinds to be installed
 - compliance with WG Dark Skies Guidance SPG.

The development shall be carried out in accordance with the approved details.

Reason: In the interest of light pollution and the special qualities of the National Park, in accordance with policies 1, 8 and 9 of the Pembrokeshire Coast National Park Local Development Plan 2.



Appeal Decision

by R H Duggan BSc (Hons) DipTP MRTPI

an Inspector appointed by the Welsh Ministers

Decision date: 14/04/2026

Appeal reference: CAS-04752-H1J4J7

Site address: Mor Awelon, Fort Road, Solva SA62 6TG

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Mrs Doreen Bowie & Ann Fletcher against the decision of Pembrokeshire Coast National Park Authority.
 - The application Ref NP/25/0085/FUL, dated 14 February 2025, was refused by notice dated 3 October 2025.
 - The development proposed is described as “Alterations and extension of an existing property.”
 - A site visit was made on 31 March 2026.
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Decision

1. The appeal is dismissed.

Main Issues

2. I consider the main issues to be the impact of the development:
 - on the character and appearance of the host property and surrounding area, having particular regard to the special qualities of the National Park, and
 - on the living conditions of the occupants of the neighbouring properties through loss of privacy.

Reasons

Character and Appearance

3. The appeal property is a two-storey detached dwelling located on an elevated clifftop site overlooking Solva harbour, and forms part of cluster of detached properties that have developed in the upper part of the village. The dwelling has been extended in the past and is finished in white cement render under a terracotta tiled roof with white single glazed timber windows and UPVC doors. Due to the sloping nature of the site the dwelling is cut into the land and appears as a single-storey building with a large expanse of roof when viewed from the rear elevation, but the front elevation is a two-storey elevation with a protruding ground floor flat roof garage, with large areas of gardens and

parking area. Although the property has a simple design, which the appellant states dates back to the 1920s, it has been unsympathetically extended with little architectural merit.

4. The appeal site lies just outside the boundary of the Conservation area, and the area immediately surrounding the property is mainly characterised by large, modern houses of different designs and scale, such as 'Pendinas', Ocean Heights', and the Dolphin Court apartment block, all of which have been renovated and/or extended in recent years by the introduction of large areas of glazing and balconies with glazed balustrades. In comparison to these modern and contemporary designs the turreted Fort House located below the appeal property is a much older but very distinctive property. Fort Cottages are situated below and some 50m from the appeal site. Of note, the Authority's Officer delegated report states that *"neighbouring development has over time contributed to the erosion of a sense of place in Upper Solva. The Landscape supplementary planning guidance recognises this to be as a result of the lost traditional form and character. A modern architectural pattern is evident in the broader setting, of dwellings with wide front elevations and large volumes of glazing to maximise views towards the harbour inlet."*
5. The appeal dwelling would be redeveloped by extensions consisting of a single-storey ground floor extension on the eastern elevation; two-storey extension on the west elevation with a first-floor balcony housing the master bedroom and living room; ground floor balcony terrace areas along the southern and eastern elevations; a small extension to the rear outbuilding; the modification and enlargement of existing dormer windows; and the insertion of rooflights and a new chimney. The renovation and development of the property would enable the rearrangement of the internal layout by providing four en-suite bedrooms with associated storage on the first floor and one en-suite bedroom on the ground floor. The ground floor would include the addition of a pantry, side entrance hall and central communal room, and the outbuilding extension accommodating a wet-room.
6. The proposed materials have been chosen to be in keeping with the recently renovated neighbouring properties, with the building being rendered and painted white, and the roof will be slated to be more in harmony with the local vernacular. To maximise the views and improve internal daylight levels large aluminium framed windows and doors are to be installed, especially on the southern elevations, which would be of high specification with good u-values. Glass balustrade would wrap around the external balcony areas and timber decking would be utilised to create a level accessible area around the building.
7. The existing building has very limited architectural quality and as such cannot be considered to be making any positive contribution to the landscape character and historic interest of the area. I find that the existing property to be very conspicuous and in its current state significantly harms the landscape within which it sits. Therefore, I see no overriding value in attempting to retain the existing dwelling in its current form or even attempting to replicate the style of the property with extensions of a comparable scale and design.
8. Overall, whilst the scale of the appeal property would be significantly increased, the proposed development would be architecturally superior and, therefore, visually preferable to the existing property. The design of the development has responded to the existing gradients of the site as well as the scale and design of adjoining properties which would result in the building sitting comfortably within the landscape, and would not materially increase the visibility of the property against the skyline when compared to the existing dwelling. On this basis, the proposed development would not materially harm the character and appearance of the area, and would take the opportunity to significantly improve the visual appearance of the host building and the appeal site.

9. While it would be visible from various public viewpoints, including the adjacent coastal path, this would be principally against the backdrop of existing large, modern houses with existing landscaping. As a result, the proposal would not be unduly imposing in public views or result in the loss of significant views. The proposal would represent an enhancement in the overall appearance of the appeal site, which is currently degraded by the existing dwelling.
10. It is also noteworthy that the NPAs Building Conservation Officer did not raise adverse comments to the development, stating that the scheme represents the *“extension of relatively modern dormer property in matching style/materials...very low impact on character and appearance of Solva Conservation Area”*. Cadw has also assessed the scheme and stated that *“whilst there may be a very slight visual change in the view from the monument (PE410 Promontory Fort S of Solva Harbour) this will not have any effect of the way that it is experienced, understood, and appreciated”*.
11. Notwithstanding that the proposed extensions and other renovation works would appear substantial and introduce additional bulk of new building, the above points lead me to conclude that the scheme would leave the landscape unharmed. Therefore, I consider that the development would not have a detrimental impact on the character and appearance of the host dwelling or the surrounding area. It would not, therefore, harm the special qualities of the National Park, or have a harmful impact on views into, out of and across this part of the valued coastline landscape. To this end, the development would comply with Policies 1, 6, 8, 14 and 29 of the Adopted Pembrokeshire Coast National Park Local Development Plan 2 (LDP) 2020.

Living Conditions

12. Policy 30 (Amenity) of the LDP seeks to protect the amenity of people living in the National Park and states that development will not be permitted where it has an unacceptable effect on amenity, particularly where: a) the development would have a detrimental impact on the quality of the environment currently enjoyed by people living, working or visiting the Park; and/or b) the development is of a scale incompatible with its surroundings.
13. As stated above, the scheme would provide additional outside space in the form of three balcony areas for the occupants to sit out and enjoy the views over Solva inlet, the largest of which would be above the existing flat-roof garage. The evidence suggests that this area is already being used as an informal terrace by the appellants. I was able to see for myself that the flat roof area already provides the opportunity for some levels of overlooking of the neighbouring property of The Fort, which is a two-storey dwelling with a converted attic space with rooflights on the northern elevation, and windows on each floor of the eastern elevation facing the flat roof area.
14. Notwithstanding the current use of the flat roof area, the proposed scheme would mean that the new enlarged balcony area, measuring approximately 39msq, would at its closest point be only approximately 4.3m from the northeastern corner of The Fort. Whilst this existing flat roof area is already used by the appellants, the formalisation and enlargement of the area with its glass balustrade, would increase its potential usage and accommodate a significantly larger number of persons for outdoor dining and entertaining in comparison to the current situation. This would increase the potential for overlooking into the closest neighbouring windows and increase the level of noise and disturbance experienced by the occupants of The Fort to the detriment of their living conditions.
15. A further raised balcony area measuring 33msq is also proposed to the ground floor of the western extension in front of the main living space, with a further smaller balcony

serving the master bedroom at first floor level directly to the rear of The Fort. Due to the change in levels of the appeal site and the fact that the site is raised above The Fort, any persons using the balconies would be able to see into the upper windows on the rear elevation and converted roof space of The Fort, and due to their close proximity persons using the proposed balconies would be visible and heard from the rear windows at The Fort. Together with the level of inter-looking, this would have the potential to result in a significant material loss of privacy as well as increasing the levels of noise and disturbance. The presence of the boundary brick wall and intervening trees would not mitigate this level of harm.

16. I appreciate that due to the steeply sloping topography and the enclosed nature of the dwellings in this area there is already the potential for mutual over-looking with consequential effects on the levels of privacy for all residents. In this regard, the appellants have specifically drawn my attention to this characteristic of the area and have submitted plans to illustrate the levels of existing and potential overlooking between neighbouring properties, including a line of sight view from the proposed first floor balcony. Nevertheless, in my opinion, when in use the proposed large areas of balconies along the ground floor of the southern elevation, allied to the first floor balcony, would materially erode the privacy that does exist at present, and would have the potential to cause increased levels of noise and disturbance that would unacceptably impact the living conditions of the occupiers of The Fort.
17. This harm would clearly outweigh the benefits for the appellants resulting from the proposed balcony areas and the benefits of improving the overall architectural aesthetics of the appeal property. It is not a matter that could be satisfactorily addressed and mitigated through the imposition of conditions.
18. I conclude on this main issue that the proposal would unacceptably harm the living conditions of the occupiers of the adjacent dwelling of The Fort due to loss of privacy, and increased levels of noise and disturbance. Accordingly, it would conflict with Policy 30 of the LDP.

Other Matters

19. The Authority has raised concerns regarding the increased amount of light pollution from the property when viewed from public viewpoints and its impact on the designated Dark Skies Reserve. It is inevitable that the level of light emanating from the property during night time hours would be higher than the existing property due to the increased area of glazing. Nevertheless, I am satisfied that this marginal increase would not in itself cause significant harm to views across this part of Solva given the number of other dwellings that already exist in close proximity to the appeal property, and is not, therefore, a reason in itself for withholding permission.

Conclusions

20. I have concluded that the development would not have a detrimental impact on the character and appearance of the host dwelling or the surrounding area and would not harm the special qualities of the National Park. However, I have come to the conclusion that the scheme would have a detrimental impact on the living conditions of the occupiers of The Fort.
21. Therefore, having regard to the above and considered all other matters raised by the appellants in support of the appeal, I conclude that the appeal should be dismissed.
22. In reaching my decision, I have taken into account the requirements of sections 3 and 5 of the Well-Being of Future Generations (Wales) Act 2015. I consider that this decision is

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in accordance with the Act's sustainable development principle through its contribution towards the Welsh Ministers' well-being objectives of building a stronger, greener economy as we make maximum progress towards decarbonisation, making our cities, towns and villages even better places in which to live and work and embedding our response to the climate and nature emergency in everything we do.

RH Duggan

INSPECTOR