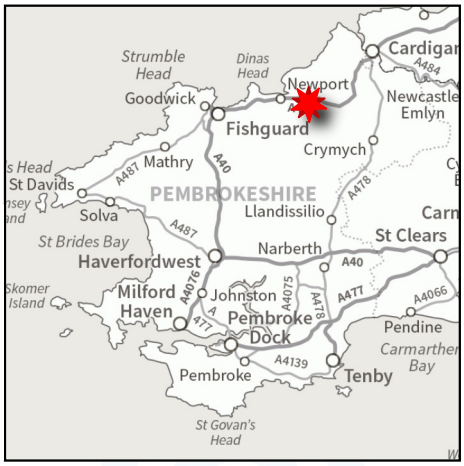
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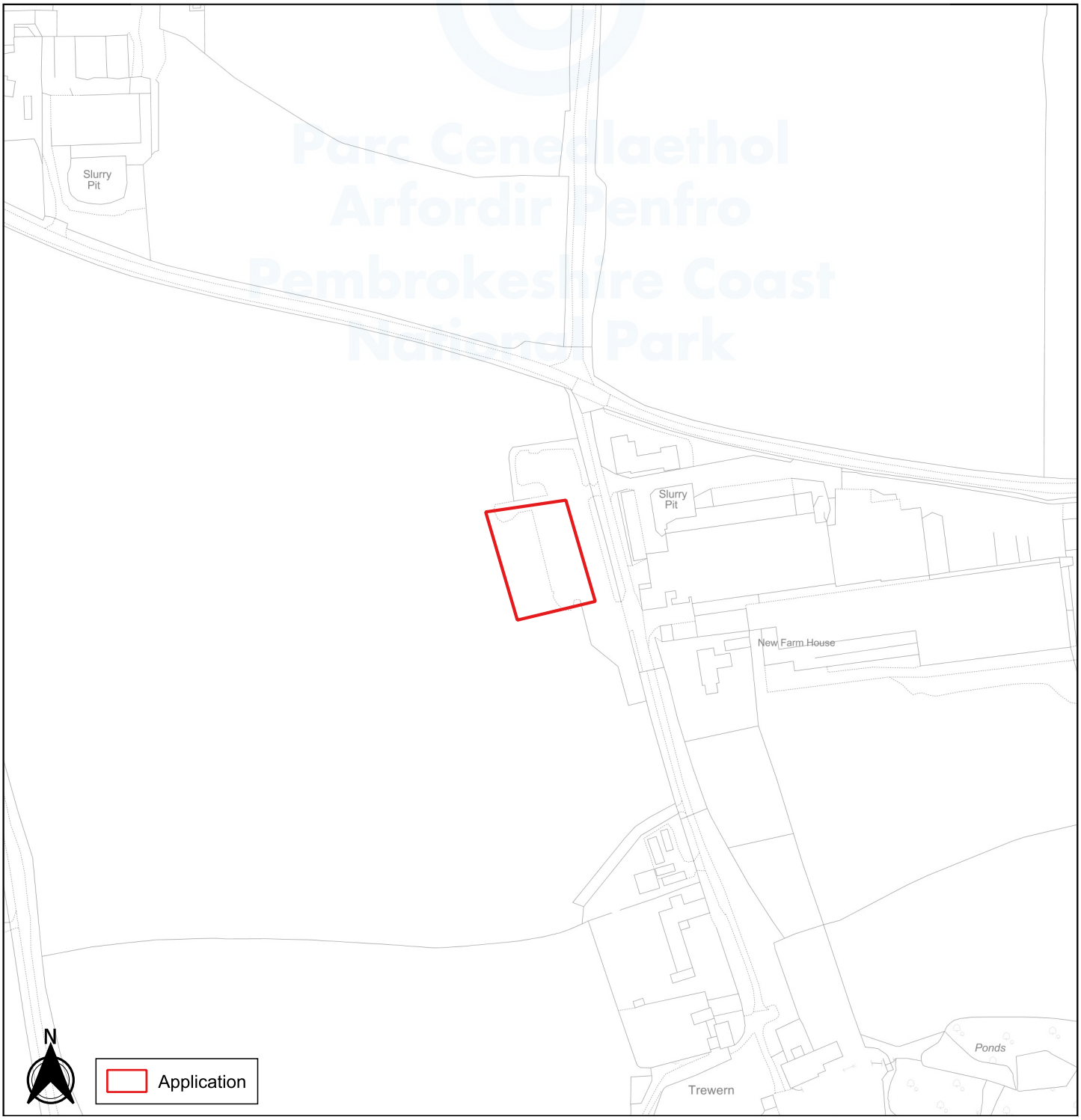
Trewern Farm, Cilgwyn, Crymych, Pembrokeshire, SA41 3XE





Parc Cenedlaethol Arfordir Penfro
Pembrokeshire Coast National Park

Graddfa/Scale: 1:2,500



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PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY
OFFICER REPORT

Ref No: **NP/26/0442/S73**
Proposal: Variation of condition No's 1, 3 & 8 of NP/15/0417/FUL to allow for updated drawings
Site Location: Trewern Farm, Cilgwyn, Crymych, Pembrokeshire, SA41 3XE

Recommendation: **Approve,** subject to conditions

This application is being presented to the Development Management Committee as the previous application was determined at Development Management Committee and one of the conditions that the application seeks to vary was imposed by Committee.

Summary

The application relates to Trewern Farm, Cilgwyn, Crymych, an established dairy farm situated within the open countryside of the Pembrokeshire Coast National Park. The holding has been the subject of a number of planning applications over several years relating to the development and modernisation of the agricultural enterprise, including agricultural buildings, livestock facilities, machinery storage and associated landscaping.

The most recent relevant planning permission is NP/15/0417/FUL, which was granted for the retrospective retention of agricultural building (Structure 13) and a hardstanding area. This permission was determined by the Development Management Committee, with conditions imposed to regulate the development and its impact on the surrounding landscape.
Condition 8 was recommended by Members at Committee and restricts the use of the relevant area of the site. This condition stated that the lay down area should only be used for vehicular and farm/agricultural machinery storage and for no other use.

The landscaping associated with the original permission has subsequently been the subject of further consideration, including application NP/26/0062/S73, which was approved to vary Condition 2 and extend the implementation period for the approved landscaping scheme as exceptionally wet conditions in winter 2025 had meant the applicant was unable to implement the landscaping plan.

The current proposal concerns the provision of a building over the hardstanding which has since been used as a calf-rearing area at Trewern Farm with mobile pods placed on the land. The applicant initially sought permission through a separate full planning application; however, that application was withdrawn because the restriction imposed by Condition 8 of NP/15/0417/FUL needed to be addressed directly.

As the proposed development requires amendments to the conditions attached to the existing permission, a new full planning application was not the appropriate route for resolving that restriction. The full application was therefore withdrawn, and the applicant has instead submitted the current application under Section 73 of the Town and Country Planning Act 1990.

Section 73 provides the statutory mechanism for seeking planning permission without complying with conditions attached to an existing planning permission. In this case, the

applicant seeks to vary Conditions 1, 3 and 8 of NP/15/0417/FUL to enable updated drawings to be approved and to address the restriction imposed by Condition 8.

The application therefore requires the Authority to consider whether the conditions attached to the original permission should be amended and whether the proposed revised arrangements are acceptable in planning terms. A permission granted under Section 73 would create a new, separate planning permission with revised conditions, while the original permission would remain in force.

The application is being presented to the Development Management Committee because the original permission, NP/15/0417/FUL, was determined by Members and Condition 8, which is central to the current application, was imposed by Members at that meeting.

Having assessed the proposed amendments and the relevant planning considerations, Officers consider that the variation of Conditions 1, 3 and 8 is acceptable and recommend that planning permission be granted, subject to appropriate conditions. The recommendation reflects the planning merits of the current application, while the Committee referral recognises the history of the original permission and the particular circumstances surrounding Condition 8.

The application documentation and plans can be viewed on our website here Citizen Portal Planning

Consultee Response

- Natural Resources Wales (NRW) - No Objection
  NRW has raised no objection to the proposed variation of Conditions 1, 3 and 8 of planning permission NP/15/0417/FUL. NRW understands that the proposal involves constructing a roof over the existing consented laydown area, which would reduce the amount of contaminated water produced and, consequently, the overall volume of slurry requiring management.
  NRW advises that the addition of a roof is not, in itself, covered by the Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021. However, the installation and ongoing maintenance of the roof must not compromise the structural integrity of any part of the existing structure, and all stores must comply with the construction and capacity requirements of the Regulations. Any manure or slurry produced must also be stored and used in accordance with the Regulations and relevant NRW guidance.

- Cadw - No Objection
  Cadw has raised no objection to the proposal in respect of the scheduled monuments identified in its assessment. Although the development would be visible from scheduled monuments within 3km, including Pentre Ifan, Carn Ingli Camp, Carn Ingli Round Barrows, the enclosure in Ty Canol Wood and Pentre Ifan Standing Stone, Cadw considers that the proposed development would be viewed alongside the existing agricultural complex. Any visual change would be slight and would not adversely affect the way in which the monuments are experienced, understood or appreciated. Cadw therefore concludes that the proposal would not have an unacceptably damaging effect on the setting of the scheduled monuments.

- PCNPA Ecology - No Objection
  The Authority's Ecology Specialist has raised no objection in principle to the proposal. The existing Habitat Regulations Assessment undertaken for application NP/15/0417/FUL has been considered, and it is noted that the restriction on livestock numbers would remain unchanged. The proposed variation would therefore not undermine the conclusions of the original assessment.
  The Ecology Specialist also confirms that the proposed development would not have a detrimental effect on the approved planting scheme, as the volume of planting remains unchanged. The submitted Green Infrastructure Statement includes a bat box on the western elevation of the proposed covered area.
  It is recommended that this should be a woodcrete or woodstone model and installed at a height of more than 3 metres above ground level, prior to the first use or substantial completion of the development.

- Pembrokeshire County Council – County Highway Authority - No Objection
  The County Highway Authority has considered the application and confirmed that the proposed development would not adversely affect the existing parking arrangements, site access or the local highway network. Having assessed the proposal on highway safety, capacity and policy grounds, the Highway Authority has no further comments to make.

Public Response

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

No representations have been received.

Policies considered

Development Plans

All planning applications in Wales need to be determined in accordance with the statutory Development Plan:
Future Wales: The National Plan 2040 Future Wales: The National Plan 2040 (FW)

Local Development Plan 2 (Adopted September 2020)

Within the Pembrokeshire Coast National Park, The Local Development Plan 2 (LDP2) is also part of the relevant development plan with the following policies being applicable to this proposal.

- Policy 01 (National Park Purposes and Duty)
- Policy 07 (Countryside)
- Policy 08 (Special Qualities)
- Policy 10 (Sites and Species of European Importance)
- 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 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
- TAN 12 - Design
- TAN 15 – Development, flooding and coastal erosion (2025)
- TAN 24 – The Historic Environment

LDP2 Supplementary Planning Guidance

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

- SPG - Biodiversity
- SPG - Landscape
- SPG - Sustainable Design and Development
- SPG – Trees and Woodland

Constraints

- Seascape Character Areas
- Landscape Character Area

Officer's Appraisal

Trewern Farm is an established dairy farm located in open countryside at Cilgwyn, approximately 1.2 km south-west of Felindre Farchog, near Crymych, Pembrokeshire.

The farm lies within the Pembrokeshire Coast National Park and outside any defined settlement boundary. The holding operates as a large-scale dairy enterprise, with approximately 950 dairy cattle and land extending across two separate parcels, including the land at Trewern and a further area at Penpedwast.

The farm has developed over time to accommodate the operational requirements of the dairy enterprise and comprises a substantial agricultural complex containing a mixture of traditional stone-built outbuildings and more modern agricultural buildings and structures.

The farmstead is situated within an undulating agricultural landscape characterised by pastureland, enclosed fields, hedgerows and occasional woodland. The surrounding countryside retains a predominantly rural character, with farms and individual dwellings dispersed across the landscape rather than concentrated within a continuous built-up area.

The wider field pattern is generally defined by hedgebanks and established field boundaries, which contribute to the enclosed character of the landscape in this part of the National Park. The farm is accessed from the local rural road network, with a single-track lane connecting the holding to the A487 to the north. The wider landscape is therefore experienced through a combination of views across agricultural fields, along rural lanes and towards established farmsteads.

The application site is located within the existing farm complex and relates specifically to a hardstanding are which has been used as a calf-rearing area with temporary mobile structures. The wider farmstead includes agricultural buildings associated with the dairy operation, together with areas of hardstanding and infrastructure required for the day-to-day management of the holding.

The hardstanding area is currently occupied by individual calf domes, which are used to accommodate calves requiring additional care in contravention of the current condition 8. The application seeks to provide a building over this existing area, bringing the calf-rearing arrangements beneath a more permanent agricultural structure and regularising this area. The proposal is therefore directly associated with the ongoing operation of the existing dairy farm.

The proposed building would comprise a mono-pitched roof finished in box-profile sheeting, with Yorkshire boarding to the western elevation and open sides incorporating galvanised gates. This arrangement is intended to provide shelter over a calf-rearing area while retaining ventilation appropriate to its agricultural function.

The structure would be read in the context of the existing farm buildings and associated operational areas, rather than as a separate or isolated building within the wider countryside. Its relationship with the established farmstead is an important consideration in assessing its visual impact, particularly given the scale of the wider agricultural operation and the presence of both traditional and modern agricultural development at the site.

The proposal also needs to be considered in the context of the farm's planning history and its continuing evolution as a working agricultural holding. Trewern Farm contains a range of agricultural buildings and infrastructure that have been developed to meet the requirements of the dairy enterprise. Historically, there was a period of rapid expansion where 12 buildings were constructed without consent but 10 of those were then later regularised through an application for a Certificate of Lawfulness: NP/18/0320/CLE. This significant expansion is likely why the field to the west of the farm has been expanded into for parking, a workshop and now for the current application.

The applicant has indicated that the proposal would not result in an increase in livestock numbers. Consequently, the principal planning considerations relate to the design, siting and appearance of the structure, its relationship with the wider farm complex, and its effect on the landscape and environmental interests of the National Park.

In landscape terms, the site lies within the Eglwyswrw Historic Landscape Character Area and the farm is visible in the landscape from the nearby Scheduled Monument at Pentre Ifan.

The area is characterised by rolling agricultural land, predominantly pastoral land use, medium-sized fields enclosed by hedgebanks and a dispersed pattern of farms, houses and cottages. Its historic development is reflected in the survival of traditional farmsteads, older agricultural buildings, historic routes and a range of archaeological and built heritage features. However, the character area is not exclusively historic or traditional in appearance; modern agricultural buildings and structures also form part of its established landscape character, particularly on larger holdings.

The assessment of the proposal must therefore consider whether the building would sit comfortably on the outer edge of the existing agricultural complex and whether its design, scale and external materials would avoid an unacceptable adverse effect on the character and appearance of the surrounding landscape. When the previous permission NP/15/0417/FUL was determined Members imposed a condition requiring the area in question only to be used for the storage of vehicular and farm/agricultural machinery due to concerns about the potential visual impact of the calf domes which are white and which it was clarified would be considered chattels and which did not form development. The current proposal which is to provide a building over a hardstanding will result in a different impact visually.

The wider historic environment is also relevant to the assessment. The surrounding landscape contains listed buildings and archaeological features, including scheduled monuments and historic settlement sites. The potential effect of the proposed structure on heritage interests must be considered in relation to its scale, location and visibility, as well as the extent to which it would alter the existing agricultural context in which the farm is experienced. Cadw has been consulted on the application and has raised no objection in relation to the effect on scheduled monuments, noting that the proposed development would be seen alongside the existing agricultural complex and would not unacceptably harm their settings.

The application also includes landscaping and biodiversity enhancement measures associated with the wider site. Existing and approved planting around the agricultural complex is intended to help soften the appearance of the buildings and structures and

integrate them into the surrounding rural landscape. A bat box is also proposed on the western elevation of the new roof. These measures are relevant to the assessment of the proposal's landscape and biodiversity effects, although their acceptability depends on their implementation and retention in accordance with the approved details and any conditions imposed.

The proposed building would be located over a previously unauthorised calf-rearing area on hardstanding which received retrospective consent on the previous application and would be viewed in the context of the wider farmstead, which already contains a mixture of traditional and modern agricultural development.

The key issue is whether the proposed structure can be accommodated within this context without causing unacceptable harm to the landscape character and special qualities of the National Park, the historic environment or biodiversity interests. These matters are considered further in the assessment below.

1. Site and Proposed Development

The proposal comprises:

- Variation of Conditions 1, 3 and 8 of planning permission NP/15/0417/FUL under Section 73 of the Town and Country Planning Act 1990.
- Installation of a building over a hardstanding area at Trewern Farm, which is currently in breach of Condition 8 imposed by the Development Management Committee
- Construction of a mono-pitched building finished in box-profile sheeting.
- Installation of Yorkshire boarding to the western elevation, with the remaining sides open and fitted with galvanised gates to provide ventilation.
- Continued use of the building for calf rearing in association with the existing dairy farm operation.
- No proposed increase in livestock numbers or expansion of the existing agricultural holding as a result of the development.
- Implementation and retention of the associated landscaping and planting scheme to help integrate the development into the surrounding agricultural landscape.
- Installation of a bat box on the western elevation as a biodiversity enhancement measure.

2. Relevant Planning History

- NP/15/0417/FUL – Retention of agricultural building (Structure 13) and laydown area – Approved subject to conditions. This is the original permission to which the current Section 73 application relates. The current application seeks to vary Conditions 1, 3 and 8 to allow updated drawings incorporating a roof over the existing calf-rearing area.
- NP/16/0603/CLE – Certificate of Lawfulness application relating to the slurry store and silage clamps – Allowed on appeal in February 2018.
- NP/18/0320/CLE – Certificate of Lawfulness for 10 agricultural buildings – Approved on 17 July 2018.
- NP/18/0507/OUT – Outline application for the erection of permanent agricultural workers' accommodation – Approved on 21 August 2019.

- NP/19/0694/RES – Reserved matters application for the detailed design, layout and access of the agricultural dwelling – Approved.
- NP/23/0451/FUL – Retrospective application for an agricultural workshop and equipment store – Approved on 31 January 2024.
- NP/24/0081/FUL – Retrospective application for an agricultural welfare building – Approved on 22 July 2024.
- NP/25/0249/FUL – Proposed machinery workshop at Trewern Farm – Approved by the Development Management Committee.

3. Key Issues

The application raises the following planning matters:

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

3.1 Policy and Principle of Development:

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. The application seeks to vary Conditions 1, 3 and 8 of planning permission NP/15/0417/FUL to allow updated drawings incorporating a building over the existing calf-rearing area at Trewern Farm. Condition 8 stated that the lay down area should only be used for vehicular and farm/agricultural machinery storage and for no other use. Calf-rearing domes have been retained on this location as an unauthorised use. The current application seeks to address this with a design solution which has a lesser visual impact than the domes and provide a more permanent solution. The proposal

would cover the area of hardstanding currently used to accommodate calf-rearing domes.

5. The applicant has confirmed that the proposal would not result in an increase in livestock numbers. The proposal would therefore support the continued operation of the existing agricultural enterprise without intensifying the authorised livestock activity.

6. Policy 1 (National Park Purposes and Duty) and Policy 7 (Countryside) of LDP2 are relevant to the assessment, alongside the other applicable development management policies. Policy 1 (National Park Purposes and Duty) requires that development in the National Park is compatible with the conservation and enhancement of the natural beauty, wildlife and cultural heritage of the Park, and the public understanding and enjoyment of the special qualities. In determining proposals, due regard will be paid to the need to foster the economic and social well-being of the local communities within the Park provided this is compatible with the statutory National Park purposes embodied in the foregoing considerations. Policy 7 (Countryside) supports new farm buildings where they are justified for agricultural purposes. Although the development is associated with an established agricultural use, its location within the National Park means that its acceptability cannot be determined solely by reference to its agricultural function. The scale, siting, design and appearance of the proposed structure must also be assessed to ensure that it conserves the natural beauty, wildlife and special qualities of the National Park. The effect on landscape, biodiversity, the historic environment and the approved landscaping scheme must be considered as part of the assessment of impacts on the special qualities.

7. The proposed structure would be located on the outer edge of the existing farm complex, where agricultural buildings and operational areas already form part of the established character of the holding. Natural Resources Wales has raised no objection and has noted that roofing the existing laydown area would reduce the amount of contaminated water produced and consequently would reduce the overall quantity of slurry requiring management. The storage and management of manure and slurry must continue to comply with the applicable agricultural pollution regulations and guidance.

8. Technical Advice Note 6 Planning for Sustainable Rural Communities in paragraph 6.2.7 states "*The efficiency of farms can be affected by the condition and extent of buildings and other fixed equipment. The full use of these assets could be impaired by the loss of specific sites to development and there may be proposals to improve buildings and equipment which are tied to investment decisions already taken. The effect on the capital investment of a farm should, therefore, be taken into account as part of the consideration of the agricultural case*."

9. In principle, the provision of a building over the hardstanding area is considered to be an acceptable form of development associated with the established agricultural use of Trewern Farm and is recognised as an investment in an existing agricultural business. This conclusion is subject to the detailed assessment of the proposal's design and landscape impact, its effect on the special qualities of the National Park, and the protection of biodiversity and heritage interests. These matters are considered in the following sections of this report.

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

10. 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.

11. 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.

12. Policy 29 (Sustainable Design) of LDP2 requires all development proposals to be well designed in terms of place and local distinctiveness.

13. The proposal seeks to provide a building with a mono-pitched roof over a concrete hardstanding on the western edge of the farm complex.

14. The applicant has explained that the farm is seeking to improve the efficiency of its existing operations and that adjustments to the layout of its agricultural facilities are intended to make day-to-day farming activities run more smoothly. The proposed building would provide a regulated arrangement for the unauthorised calf-rearing area, it would not further extend the farm into the countryside. The Authority recognises that agricultural businesses need to adapt their buildings and facilities to support the effective operation of modern farming practices.

15. An important consideration is that the proposal does not seek to increase the number of livestock kept at Trewern Farm. Livestock numbers have been restricted through the conditions attached to previous planning permissions, and those restrictions remain relevant to the operation of the farm. The current application is concerned with a new building, rather than an intensification of the agricultural use through an increase in livestock numbers. The proposed development would therefore facilitate the management of the existing operation without seeking to expand the permitted livestock capacity. The continued control of livestock numbers is an important consideration in assessing the proposal and its relationship with the wider environmental and landscape interests of the National Park.

16. The proposed structure would be constructed using box-profile sheeting, with Yorkshire boarding on the western elevation and the remaining sides largely open, incorporating galvanised gates. Its functional agricultural design and use of materials would be consistent with the character of a working dairy farm. Although the building would introduce a more permanent built form over the hardstanding, it would be located alongside existing agricultural buildings and would read as part of the established farm complex. Members previously raised concerns about the visual impact of the calf domes when viewed from the wider landscape including views from Pentre Ifan. The calf domes are light in colour and Officers consider that they had a greater adverse visual impact in the wider landscape than the proposed structure being presented within this application which will be viewed against the backdrop of a large established farm complex.

17. The visual impact of the proposal must also be considered alongside the existing and approved landscaping at the farmstead. The wider site benefits from an approved planting scheme, including planting associated with the earth bund around the farm. The submitted site plans and three-dimensional visualisations illustrate the relationship between the proposed building, the existing agricultural buildings and the proposed planting. These demonstrate how the structure would sit within the wider farm complex and how the planting would help soften views of the development and visually contain the operational area. The planting to the south of the farm is intended to be completed before the end of winter 2028. As the proposal is located on existing hardstanding and does not require the removal of any existing planting.

18. The three-dimensional visualisations are particularly helpful in understanding the proposed structure in the context of the existing farm buildings and the established landscape framework and will be presented to Committee. When considered alongside the proposed planting scheme, they indicate that the roof would be experienced primarily as part of the existing agricultural complex, rather than as a prominent standalone feature in the wider landscape. The planting would help soften and filter views of the built development, including views from the surrounding countryside as the landscaping matures. While the structure would remain visible from some viewpoints, it is considered by Officers that the resulting landscape impact would not result in an unacceptably adverse impact on landscape character.

19. The relevant consideration is whether its siting, scale, design and relationship with the landscape would result in unacceptable harm. In this case, the combination of the existing farmstead, the contained siting of the proposal and the approved and proposed planting scheme is considered to limit its wider visual impact.

20. The site lies within the Eglwyswrw Historic Landscape Character Area, which is characterised by rolling agricultural land, pasture fields, hedgebanks, dispersed farmsteads, traditional stone buildings and more modern agricultural structures. The proposed development would be viewed in the context of the existing adjacent farm complex and the established agricultural character of the area. The proposal is therefore considered to be compatible with the broad historic landscape character of the area.

21. The site is also located within the wider setting of several Scheduled Monuments. Cadw was consulted on the application and, in their response dated 29 September 2026, raised no objection in respect of Scheduled Monuments. Cadw identified that the proposed building may be visible alongside the existing agricultural complex from a number of monuments within approximately 3 kilometres of the site, including Pentre Ifan (PE008), Carn Ingli Camp (PE011), Carn Ingli Round Barrows (PE019), the Enclosure in Ty Canol Wood (PE481) and Pentre Ifan Standing Stone (PE501). Cadw considered that the proposal would result in only a slight visual change and would not have an unacceptably damaging effect on the setting of these monuments or on the ability to experience, understand and appreciate their significance. This specialist advice supports the conclusion that the proposal would not result in unacceptable harm to the historic environment.

22. Natural Resources Wales has also raised no objection and has noted that covering the existing calf-rearing area would reduce the amount of contaminated water requiring management. This is a further practical benefit of the proposal, provided that construction and subsequent use do not compromise the integrity of the existing agricultural infrastructure or applicable pollution-prevention requirements.

23. Overall, the proposal is considered to be acceptable in form and scale. It would consolidate the existing unauthorised calf-rearing facilities, improve the organisation of the operational farmstead and support the efficient day-to-day management of the farm, without seeking an increase in livestock numbers. The proposed structure would be located on existing hardstanding and would be read against the context of the existing adjacent agricultural buildings. The submitted three-dimensional visualisations, considered alongside the current and approved planting scheme, demonstrate how the development could be integrated into the farmstead and how planting would help filter and contain views of the structure within the wider landscape.

24. The development is not considered likely to cause significant visual intrusion or unacceptable harm to the special qualities of the National Park. The proposal is therefore considered to accord with Policies 08 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park) and 29 (Sustainable Design) of LDP2.

3.3 Amenity and Privacy:

25. 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.

26. The proposal involves the installation of a building over an existing unauthorised calf-rearing area within the established operational farmstead at Trewern Farm. The proposal would consolidate and regularise this existing activity and is intended to improve the organisation and efficiency of the farm's day-to-day operations. It would not introduce a new use to the wider site or, in itself, result in an increase in livestock numbers.

27. The existing farm is an established agricultural enterprise within the open countryside, where a degree of noise, activity and odour associated with normal farming operations can reasonably be expected. The proposed structure would be located alongside existing agricultural buildings and within the established farm complex. It would not introduce a new use or an activity that is inherently incompatible with the surrounding rural area.

28. In terms of noise and general disturbance, the proposal would accommodate an existing calf-rearing activity withing a building rather than establish a new agricultural operation. While normal farm activity associated with the care and management of livestock would continue, there is no evidence to suggest that the proposed building would give rise to a significant increase in noise or disturbance over and above that associated with the established use of the site.

29. The proposed building would also be seen in the context of the existing agricultural buildings and the established planting scheme around the farmstead. The submitted three-dimensional visualisations illustrate the relationship between the roof, the existing buildings and the surrounding landscape. The proposed planting would help filter views of the structure and provide a degree of visual containment as it matures. While the development would be visible from some viewpoints, its position within the existing farm complex and its agricultural design mean that it is not considered to result in an unacceptable visual intrusion or an adverse effect on the amenity of those living, working or visiting the National Park.

30. The only potential concern with the covering over of this hardstanding area, which was previously approved for vehicular storage and calving only, is that it could lead to further incursion into the open countryside as has historically happened on this holding, displacing vehicles further to the west of the site. However, the application documents do not show any further incursion into undeveloped land, so this would be a matter for the planning authority to monitor going forward.

31. Having regard to the existing agricultural use of the site, the nature and scale of the proposed development, the continued restriction on livestock numbers, and the relationship of the structure to the existing farmstead and planting, the proposal is not considered likely to result in an unacceptable adverse effect on residential or visual amenity through noise, odour, traffic, disturbance or visual intrusion. The proposal is therefore considered to accord with Policy 30 (Amenity) of LDP2.

3.4 Biodiversity, Green Infrastructure & Landscaping and Protected Sites

Biodiversity impacts

32. 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.

33. The application relates to a building over an existing hardstanding within the operational farmstead. The proposal does not involve the removal of any planting, and the submitted information indicates that the development can be accommodated without adversely affecting the existing green infrastructure. The Authority's Ecologist was consulted and, in a response dated 13 October 2026, raised no objection in principle to the proposal. The response did not identify any specific protected species constraint that would prevent the development from proceeding.

34. The Ecologist also confirmed that the addition of the proposed structure would not have a detrimental effect on the existing/proposed planting scheme. A bat box is proposed on the western elevation of the new calf cover as a biodiversity

enhancement. The Ecologist recommended that the box should be constructed from woodcrete or woodstone, rather than wood, and that its installation should be secured by condition. The condition should require the bat box to be installed in accordance with the Green Infrastructure Statement, at a height exceeding 3 metres above ground level, before the first use or substantial completion of the development. Subject to this measure, the proposal is considered acceptable in biodiversity terms.

Net Benefit for Biodiversity and Green Infrastructure

35. 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.

36. 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.

37. 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.

38. A Green Infrastructure Statement and Biodiversity Enhancement Scheme have been submitted with the application. The submitted information identifies that the proposal would be constructed on existing hardstanding and would not require the removal of any planting associated with the farmstead. The statement also identifies the provision of a bat box on the western elevation of the proposed structure. The existing planting scheme would continue to provide landscape integration and biodiversity value, while the bat box would introduce an additional opportunity for roosting bats.

39. A previous application sought to extend the period for planting approved under NP/15/0417/FUL to the south of the farm complex, which was submitted under NP/26/0062/S73 and explained that the applicant had been unable to undertake the proposed landscaping in the first planting season due to severe wet weather and requested a further two planting seasons which means that the planting would need to be implemented. Three further planting seasons were allowed to implement the full scheme taking the landscaping implementation potentially up to the end of the winter of 2028.

40. The landscaping enhancement previously approved for this western section of the farm was approved under NP/25/0249 which was a consent for a new workshop. The landscaping for this part of the farm was conditioned to be implemented in the season after submission of the landscaping scheme. The LPA have not yet received a landscaping scheme for approval in respect of that building, which it is understood has not yet been constructed, and so a further landscaping condition is considered to be justified on this application as to date, there has been no additional landscaping planted in respect of the 14 buildings constructed and/or approved in recent years.

41. The Authority's Ecologist has reviewed the proposal and confirmed that the volume of proposed planting would remain unchanged from the original approved scheme. The Ecologist did not consider that the proposed structure would have a detrimental effect on the proposed planting and raised no objection in principle, subject to the recommended bat-box provision. The proposal therefore retains the proposed green infrastructure and provides a specific biodiversity enhancement without requiring the removal of approved planting.

42. The submitted plans and three-dimensional visualisations also demonstrate the relationship between the proposed building, the existing agricultural buildings and the surrounding planting. The proposed planting would continue to help integrate the farmstead into the wider landscape and filter views of the development. As the proposal is confined to an established hardstanding area and does not require the loss of the approved planting, it would not undermine the existing landscape framework.

43. Overall, the submitted Green Infrastructure Statement identifies the retention of previously proposed planting and the provision of a bat box as the principal biodiversity measure associated with the development. The Ecologist has confirmed that the proposal would not adversely affect the proposed planting scheme and has recommended a condition to ensure that the bat box is implemented. Subject to the implementation of that condition, the proposal is considered acceptable in terms of biodiversity and green infrastructure. The retention of the proposed planting and provision of the additional enhancement are consistent with the objectives of PPW12 and the Environment (Wales) Act 2016.

Protected Sites

Habitat Regulations Assessment

44. Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) are internationally designated sites protected under the Conservation of Habitats and Species Regulations 2017, as amended. Where a proposal is likely to have a significant effect on a European site, either alone or in combination with other plans or projects, the competent authority must undertake the necessary Habitats Regulations Assessment (HRA) before authorising the development. The close proximity of the site to the North Pembrokeshire Woodlands Special Area of Conservation (SAC) which is an old sessile oak wood with an exceptional diversity of rare epiphytic lichens has meant that historic proposals at this site which would result in an increase in livestock numbers have required appropriate assessment under the Habitat Regulations to assess potential impacts.

45. A Habitat Regulations Assessment was undertaken in connection with the original permission, NP/15/0417/FUL. The Authority's Ecologist has reviewed the current Section 73 application and confirmed that the mitigation restricting livestock numbers remains in place and would not be altered by the proposed variation of conditions as this condition will be replicated again on any new decision notice. The Ecologist therefore raised no concern that the current proposal would undermine the conclusions of the original HRA.

46. The current application seeks to amend the approved plans and associated conditions to accommodate a building over the informal calf-rearing area. It does not seek to

increase livestock numbers or remove the previously established mitigation. Having regard to the Ecologist's consultation response, the proposal is not considered to undermine the conclusions of the original HRA. The existing livestock-number restriction must remain effective and enforceable following the determination of this application and will be reapplied with this permission. As this proposal will not result in any increased numbers of livestock the proposal has been screened out a not having a likely significant effect on the North Pembrokeshire Woodlands Special Area of Conservation.

47. Taking the above matters into account, the proposal would retain the previously proposed planting scheme, provide a bat-box enhancement and leave the established livestock-number mitigation unchanged. NRW has raised no objection, and the Authority's Ecologist has raised no objection in principle, subject to the recommended biodiversity condition. The proposal is therefore considered acceptable in relation to biodiversity, green infrastructure and the matters addressed by the relevant consultation responses, subject to the imposition of an appropriate condition securing the bat box.

3.5 Access and Parking

48. 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.

49. Additionally, Policy 60 (Impacts of Traffic) of LDP2 permits development where appropriate access can be achieved, and potential transport impacts can be satisfactorily mitigated.

50. Pembrokeshire County Council's Highway Development Control team was consulted on the application. In its response dated 28 September 2026, the Highway Authority confirmed that the proposal would not adversely affect the existing parking arrangements, access or local highway network. It raised no further comments on highway safety, capacity or policy grounds.

51. Having regard to the nature and location of the proposal, the retention of the existing access arrangements and the Highway Authority's consultation response, the development is not considered to give rise to any unacceptable highway safety or traffic impacts. The proposal is therefore considered to accord with Policies 59 (Sustainable Transport) and 60 (Impacts of Traffic) of LDP2.

3.6 Surface Water Drainage:

52. 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.

53. The submitted site layout indicates that surface water drainage is to be managed on site through a soakaway arrangement. Given that the building is proposed over an

existing operational agricultural area, the principle of managing clean roof water separately from potentially contaminated water is appropriate, provided that the drainage system is suitably designed and installed. The building may also assist in reducing the volume of rainfall coming into contact with livestock waste and other potentially contaminating materials, thereby helping to limit the generation of contaminated water requiring management.

54. Natural Resources Wales has raised no objection to the proposal and has noted that covering the existing laydown area could reduce contaminated water and the overall volume of slurry requiring management. The drainage arrangements must, however, ensure that roof water is discharged appropriately and does not result in increased runoff, pollution or adverse effects on neighbouring land or watercourses.

55. Having regard to the existing hardstanding, the limited nature of the proposed development and the submitted drainage information, the proposal is considered acceptable in principle in relation to surface water management. Subject to the soakaway being appropriately designed and implemented, the development would accord with Policy 32 of LDP2 and the relevant principles of TAN 15.

4. Conclusion

56. The application seeks to vary Conditions 1, 3 and 8 of planning permission NP/15/0417/FUL to facilitate the installation of a building at Trewern Farm. The proposal would regularise the current unauthorised calf-rearing arrangements beneath a permanent building within the farmstead, on an area of existing hardstanding. The development would support the continued operation of the established agricultural enterprise without increasing livestock numbers or introducing a materially different use of the site.

57. The proposal has been assessed against the development plan, comprising Future Wales: The National Plan 2040 and the Pembrokeshire Coast National Park Authority's Local Development Plan 2 (LDP2), together with relevant national planning policy and guidance, including Planning Policy Wales (Edition 12) and the applicable Technical Advice Notes. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

58. Having regard to the siting, scale, design and external materials of the proposed building, it is considered that the development would remain appropriately associated with the adjacent farmstead and would not result in unacceptable harm to the landscape character or special qualities of the Pembrokeshire Coast National Park. The existing agricultural buildings, together with the approved/proposed landscaping, provide the context for the proposal. Cadw has raised no objection in respect of the effects on the settings of nearby scheduled monuments, concluding that the development would not have an unacceptably damaging effect on their setting.

59. Overall, the proposed development is considered acceptable in planning terms and would accord with the relevant policies of LDP2, including Policies 1, 8, 11, 14, 29, 30 and 32, together with Policies 59 and 60 in relation to transport and highway

considerations, insofar as they are relevant to the proposal. No material considerations have been identified that would warrant refusal of the application.

60. In reaching a recommendation, regard has been given to the requirements of sections 3 and 5 of the *Well Being of Future Generations (Wales) Act 2015*. It is considered that this recommendation is in accordance with the Act's sustainable development principle through its contribution towards the Welsh Ministers' well-being objective of supporting safe, cohesive and resilient communities.

5. Recommendation

APPROVE, subject to the following conditions:

1. The development shall begin not 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:
- Structure 13 Elevations 57 A received 03/09/2024
- Block Plan/Location Plan 56B received 03/03/2026
- Landscaping Planting Plan (Area 13) 771/01C received 03/09/2024
- Landscaping Plan (Schedules, Spec & Management) 771/02 received
- 03/09/2024
- 64 Existing & Proposed 3D Images of Covered Area received 11/09/26
- 65 Existing & proposed 3D Images of Covered Area received 11/09/26
- 66 Existing & Proposed Site Plans & Location Plan received 11/09/26
- 67 proposed Elevations & Section A-A received 11/09/26
- Green Infrastructure Statement received 11/09/26

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 proposed landscaping shall be implemented over the next planting season immediately following the date of this permission, in accordance with:
- Block Plan/Location Plan 56B received 03/03/26
- Block plan as proposed (landscaping) 1506 Drawing No 60 Rev A
- Green Infrastructure Statement received 11/09/26
- 66 Existing & Proposed Site Plans & Location Plan received 11/09/26

Any trees or plants which within five years of planting die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species unless otherwise agreed in writing by the Local Planning 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)

4. The lighting scheme previously approved under NP/24/0498/DOC shall be implemented within 12 months of the date of this consent and maintained thereafter, with no additional external lighting to be implemented without a further application being made.
Reason: In order to improve the current light pollution on the site, and to improve the tranquillity and special qualities of the National Park in accordance with Policies 1, 8 and 9 of the Local Development Plan.

5. The landscaping works shall be carried out in accordance with:
   - Document ref: 771/02 Schedules, Specifications and Management Received 03/09/2024 before Spring 2029.
   - Landscaping Planting Plan (Area 13) 771/01C received 03/09/2024 before spring 2029.
   - Block Plan/Location Plan as Proposed – 1506/56B rec'd 02/12/2024
   - Block Plan (landscaping) 1506 Drawing No 60 Rev A before the spring of 2027.
   - Green Infrastructure Statement received 11/09/26
   - 66 Existing & Proposed Site Plans & Location Plan received 11/09/26

   Development shall thereafter take place in accordance with the approved details. Any variations to the details of the documents and plans must only be undertaken after the proposed variations have been agreed in writing by this authority.
Reason: In the interests of maintaining a suitable scheme of landscaping to protect the visual amenity of the area, to maintain the special qualities of the landscape and habitats through the protection, creation and enhancement of links between sites and their protection for amenity, landscape and biodiversity value of the site and surrounding area. Local Development Plan 2 – Policies: 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation and enhancement of the Pembrokeshire Coast National Park), 30 (Amenity), SPG 07 – Biodiversity, Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009), Technical Advice Note (TAN) 10: Tree Preservation Orders.

6. The number of cattle at Trewern Farm holding (as shown on blue lined plan 1506 54) shall be limited to a maximum of 960 milking cows reflecting the capacity of cubicles in authorised buildings on site. With other cows who are due to calve, maximum ear tag numbers on the holding should not exceed 1020 (excluding calves). A statutory declaration with evidence of numbers of milking cows and overall herd size from ear tag numbers shall be submitted to the Local Planning Authority on the 1st May every year.
Reason: In order to ensure that there is no harm to the conservation status of the adjacent SAC.

7. There shall be no external or internal lighting to the building hereby approved without a lighting scheme having been first submitted and approved. Such scheme as is agreed shall be implemented and not added to thereafter without further written consent.
Reason: To comply with the Wildlife & Countryside Act 1981 (as amended), the Conservation of Habitats and Species Regulations 2017 and the Environment (Wales) Act 2016 and to reduce unnecessary light pollution in accord with Policies 9 and 11 of the Pembrokeshire Coast National Park Local Development Plan.

8. The translucent panels suggested for removal and shown on Plan 1506 57 A for Buildings 14 (the building to the immediate west of Building 13) and13 shall be removed and replaced, or covered over with matching solid panels as per the plan within 6 months of the consent hereby approved.
Reason: In order to prevent light pollution and to comply with Policy 9 of the Pembrokeshire Coast Local Development Plan.

9. The building hereby approved shall be used for calves on bedding and calf bedding storage only, and for no other use.
Reason: In the interests of protecting the special qualities of the National Park and in accord with Policies 8 and 14.

10. The sides of the building hereby approved shall not be enclosed, without a further application being made to the LPA, to ensure that materials are appropriate and that biodiversity enhancements are not impacted.
Reason: In order to ensure that there are no adverse visual impacts as a result of further development and to ensure that the building complies with Local Development Plan Policies 8, 14 and 29.

11 The timber boarding hereby approved for the western side of the calf rearing barn shall be implemented as shown, and retained in that material thereafter.
Reason: to ensure that there are no further unintended visual impacts and to ensure that the building complies with Local Development Plan Policies 8, 14 and 29.