

**Application Ref: NP/18/0134/FUL**

<b>Case Officer</b>	Caroline Bowen		
<b>Applicant</b>	Ms S Gillooley		
<b>Agent</b>			
<b>Proposal</b>	One Planet Development for Eco-smallholding including one dwelling		
<b>Site Location</b>	Land Adjacent to Castle Hill, Newport, Pembrokeshire, SA420QE		
<b>Grid Ref</b>	SN05933836		
<b>Date Valid</b>	05-Mar-2018	<b>Target Date</b>	18-Jul-2018

This application is reported to committee, as the application is categorised as Major development.

**Consultee Response**

**PCNPA Planning Ecologist:** Further information required prior to determination

**PCNPA Buildings Conservation Officer -** The proposed development will have low impact on the setting of Newport Conservation Area therefore I have no adverse comments. Potential precedent is however a concern.

**Dyfed Archaeological Trust:** Recommend that an historic environment appraisal should be carried out prior to determination

**Dwr Cymru Welsh Water:** No further comments

**CADW - Protection & Policy:** No objection

**PCC - Transportation & Environment:** No objection

**Natural Resources Wales:** No objection

**PCC - Common Land Officer:** No adverse comments

**Newport Town Council:** Recommend Refusal

**Public Response**

The application was advertised in accordance with statutory requirements, and nearest neighbours notified by letter. 21 letters of objection were received, together with a petition objecting to the proposal comprising 151 signatures. In summary the issues identified were:

- There is no right of access over the privately-owned lane for the applicant.
- The range of land based activities appears to be unrealistic for one person to manage.
- Concern that the chosen produce will not perform well at the application site which is of poor soil quality, and would not be sustainable in the long run.
- The car park has been extended, which is contrary to the aims to reduce vehicular trips and use.
- Despite the applicant owning the land for many years, there has been no activity on the site to establish produce.
- The chosen land based activity is not sustainable given site conditions

- There has been an under-estimation of capital expenditure (ie) for the sourcing of plants, trees etc; and of essential expenses, namely domestic insurance, servicing of stoves and equipment and cost of IT/telecommunications (especially in relation to the business elements of the OPD).
- The main lane access (from College Square) is a known walking route and regular vehicle trips would conflict with pedestrians.
- The effect of the development on a unique place which is enjoyed by others.
- The applicant will be building the house prior to working the land.
- The risk of land and water pollution to existing water courses from free range livestock and additional fertilization of the land.
- The establishment of coppice/willow plantings will be difficult as the site is exposed and unsheltered.
- Intensification of the site as further shelters/buildings /light reflecting polytunnels are required for food production.
- The opportunities for marketing and sales of produce are limited in the locality, and the Monday market operates on a short seasonal trade.
- The type of dwelling is fragile for the location, and is a fire risk in a location which cannot easily be accessed by emergency services.
- The area has a distinct environmental character given the proximity to the SSSI. The impact on the ecology of the whole area would be disastrous.
- The application does very little to address the limitations identified by the Inspector and which led to the previous appeal dismissal.
- The proposed dwelling has been re-positioned (from the previous application) to a more conspicuous location alongside a popular footpath route up the mountain to the summit of Carningli.
- The Management Plan lacks sufficient detail in respect of travel and needs arising from the proposed guided tours.

### **Policies considered**

Please note that these policies can be viewed on the Policies page Pembrokeshire Coast National Park website -

<http://www.pembrokeshirecoast.org.uk/default.asp?PID=549>

LDP Policy 01 - National Park Purposes and Duty

LDP Policy 07 - Countryside

LDP Policy 08 - Special Qualities

LDP Policy 11 - Protection of Biodiversity

LDP Policy 15 - Conservation of the Pembrokeshire Coast National Park

LDP Policy 21 - Minerals Safeguarding

LDP Policy 29 - Sustainable Design

LDP Policy 30 - Amenity

LDP Policy 32 - Surface Water Drainage

LDP Policy 33 - Renewable Energy

LDP Policy 47 - Low Impact Development

PPW9 Chapter 02 - Development Plans

PPW9 Chapter 03 - Making and Enforcing Planning Decisions

PPW9 Chapter 04 - Planning for Sustainability

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Development Management Committee – 18<sup>th</sup> July 2018

PPW9 Chapter 09 - Housing  
 SPG02 - Low Impact Development making a positive contribution  
 SPG06 - Landscape  
 SPG14 - Renewable Energy plus Addendum on Field Arrays  
 TAN 06 - Planning for Sustainable Rural Communities  
 TAN 12 - Design

### **Constraints**

Site of Special Scientific Interest - within 50m  
 Common Land CROW Access  
 LDP Mineral Safeguard  
 Historic Landscape  
 Rights of Way Inland - within 50m  
 Potential for surface water flooding  
 Recreation Character Areas  
 Landscape Character Assessment  
 Seascape Character Assessment

### **Officer's Appraisal**

#### **Site description and background**

The application site comprises 2.23 hectares (5.51 acres) of land, set out as 6 field parcels located on the south eastern outskirts of Newport, and just below Carningli Mountain. The prevailing ground levels slope downward to the north. The application site is bordered by sections of mature woodland and hedgerows to the west, with the property 'Stone Hill' beyond. There is a stream and road access running adjacent to the western boundary, outside of the application site area. To the south west, the land adjoins Carningli Common and to the south east, the site adjoins fields which are in separate ownership. To the east, again, the site borders adjoining fields not in the applicant's ownership. Access to the site is via an existing entrance to the north of the site and from the minor Castle Hill road. A parking area is sited at this entranceway.

The site falls outside of the Centre Boundary as defined for Newport in the Pembrokeshire Coast National Park Local Development Plan, thus is to be considered as development in the open countryside.

Planning permission was originally sought for a single occupancy Open Planet Development in 2015. Following the statutory and public consultation of the application, and the consideration of both National and Local planning policies, the application was refused at Committee on the grounds that it was not considered that the proposed Management Plan was sufficiently robust to ensure that the application site would be managed in a way that would retain and enhance the special qualities of the National Park landscape, which the Authority has a statutory duty to protect. In light of this, the proposed One Planet Development was not considered to make a positive contribution to the site, and the proposal - which would introduce a residential element and associated requirement for travel to and from the site - would

intensify the use of the site which would impinge negatively on this location and on its setting within a highly sensitive landscape within the National Park.

A subsequent appeal made to the Planning Inspectorate was dismissed on the grounds that the Inspector did not consider that the appellant's requirements in terms of essential food and income could be obtained from the site. The Inspector said:

*36. I recognise that there will be inevitably be a degree of uncertainty in OPD developments not least as occupants are trialling new ways of working, and that it is quite different from traditional agricultural practices. Whilst I do not dispute the good intentions of the appellant, and although some elements of the business plan may be viable, I am not convinced that the necessary output can be realized, Taking these factors into account, I treat the appellant's claim that a minimum of 65% of the basic household needs from the resources and activities on the site would be met by 2018 with considerable caution. Consequently, I am not satisfied on the balance of probability that the occupiers requirements in terms of income and food can be obtained directly from the site.*

A copy of the appeal decision is attached to this report as Appendix A, as the decision is a material consideration in the determination of this application.

## **Current Application**

Planning permission is sought for a single occupant household, low-impact lifestyle under the principles of One Planet Development (OPD).

To be assessed as OPDs applicants are expected to be able to meet 65% of their basic food needs from their land, either by producing all of the 65 % from the land, or by producing no less than 30% from their land and the remaining 35% using income derived from the sale/barter of produce grown and reared on their site. In this application for a OPD the applicant expects to derive 55% of their food directly from the land.

This OPD proposal would be based on rearing geese for consumption, growing lavender plants for sale and crafts, raising chickens for eggs and meat, growing willow for crafts, and growing primroses which will be processed for sale as edible flowers. In addition, the applicant will offer 4 guided tours during the summer months.

## **Planning History**

- NP/08/107 - Change of use to natural burial site to include associated parking, turning and storage barn. Withdrawn.
- NP/15/0310/FUL - One Planet Development including one dwelling. Refused, and Appeal Dismissed.

## **Key issues**

Planning Policy Wales (PPW) (Edition 9, 2016) states that development in the countryside should be located within and adjoining settlements, and that new building in the open countryside away from existing settlements should be strictly

controlled (paragraph 4.7.8) The main issue to be considered in the determination of this application, therefore, is whether the proposed One Planet Development is an appropriate form of development in the open countryside.

## **Policy**

### *National policy*

PPW identifies OPD in its strategic housing policy, and in Chapter 9 – Housing, paragraph 9.3.11 defines One Planet Development (OPD) as ‘as ‘development that through its low impact either enhances or does not significantly diminish environmental quality’. The essential characteristics of OPD are that development must have a light touch on the environment, be land-based, have a low ecological footprint, have very low carbon buildings, evidenced by carbon analysis, and shall be the sole residence for the proposed occupants. This is to be evidenced by a clearly understood Management Plan produced by a competent person(s), setting out the objectives of the proposal, the timetable for the development of the site and the timescale for review.

The relevant policy and guidance is set out in Technical Advice Note 6 – Planning for Sustainable Rural Communities, published by the Welsh Government in July 2010 (paragraphs 4.15 to 4.23). Detailed Practice Guidance on One Planet Development to accompany TAN 6 was produced in October 2012, and provides the template for the Management Plan structure and purpose:

<https://gov.wales/docs/desh/publications/121114oneplanetguideen.pdf>

A detailed and unambiguous Management Plan is an essential characteristic of OPD, as this document defines the proposed lifestyle. The Management Plan is expected to be reviewed and updated through the life of the OPD, provide a programme of monitoring criteria for both applicant and the local planning authority, and contain a clear Exit Strategy should the OPD fail to achieve its essential characteristics.

### *Local policy*

Whilst Local Development Plans are not intended to repeat national planning policy, there are local policies in the adopted Pembrokeshire Coast National Park Local Development Plan which are relevant to the consideration of this proposal.

Policy 7(g) Countryside specifically allows for low impact development (similar to OPD definition) that makes a positive contribution, and the companion Policy 47 of the Local Development Plan contains eight tests to be met in any application, with a requirement that they all must be met to justify a proposal. The Supplementary Planning Guidance (SPG) in relation to Low Impact Development sets out the National Park Authority’s approach to proposals submitted under policy 47 and was updated to take into account the subsequent adoption of national OPD policy requirements.

The principle of OPDs is supported by national and local planning policy, which (subject to appropriate details) allow for such developments in the open countryside.

## Site and context

For OPD, the site must be capable of meeting the minimum needs of the residents in terms of productive capacity and size, however there is no minimum or maximum size of site defined. The parts of the site used for residential use should be already well screened or be capable of being well screened in the surroundings. There must be opportunities to conserve and enhance the biodiversity, cultural heritage and landscape of the site, adding to its environmental capital, and the site should be accessible to modes other than the private car, to reduce its use.

Sites of high ecological or landscape sensitivity may not be suitable as even OPD activities could have unacceptable negative impacts unless the original features can be carefully conserved and enhanced.

In the appeal decision, the Inspector stated that;

*'46. In this context, I do not find that the development would conflict with LDP Policy 1 which requires development to be compatible with the conservation or enhancement of the natural beauty, wildlife and cultural heritage of the NP and the public understanding and enjoyment of these qualities. I do not consider that the development would adversely affect the special qualities of the NP, but would meet with the Policy 8 objectives of protecting the historic pattern and diversity of the landscape. Neither do I find that the development would cause significant visual intrusion or that it would be insensitively sited in the landscape in line with LDP Policy 15.'*

In light of the Inspector's view, the principle of an OPD at this location is acceptable.

## The proposed Management Plan.

The Practice Guidance states that an OPD requires persons to live more sustainably (and differently) than the norm in the 21<sup>st</sup> century. This is to be demonstrated through the Management Plan which should broadly identify the following;

- Baseline – the current condition and features of the site
- the chosen Design/Strategy
- A Business and Improvement Plan. This is further subdivided into
  - Land based activity
  - Land Management
  - Energy and Water
  - Waste
- Zero Carbon Buildings
- Community Impact Assessment
- Transport Assessment and Travel Plan
- Ecological Footprint Analysis
- Phasing, Monitoring and Exit Strategy

### *Baseline*

The baseline is an essential element as this is a benchmark against which the applicant must demonstrate that their development conserves and enhances the site, adding to its environmental capital. The applicant has provided an audit of the site's characteristics, which uses LANDMAP - an all-Wales landscape resource where landscape characteristics, qualities and influences on the landscape are recorded and evaluated.

The LANDMAP cultural landscape assessment states that the extensive tracts of moorland on Carningli and Mynydd Preseli (immediately south of the site) give an exposed and mountainous feel to the landscape. Nineteenth and twentieth century enclosure of common land is evident on the southern flank of the mountain block. The boundary between cultivated land and moorland on the northern fringe, however, appears to have changed little since the early nineteenth century. To the west of the site appears to be ruins of a building – this is confirmed on older ordnance survey maps. The land also contains a network of stone field boundaries. The land itself is Grade 4 under the Agricultural Land Classification system, classified as poor quality agricultural land, and has historically been used for grazing.

The site borders the Carningli Common SSSI; and the applicant has also referred to the Authority's Supplementary Planning Guidance on Landscape Character Assessment, under which the site falls within LCA 22 – Mynydd Carningli, where the proposal would not appear to conflict with the management guidance for the location. The ecological survey originally submitted was out of date, and the Authority's Ecologist is –at the time of writing this report – considering a revised survey. Officers will update members at the meeting.

In respect of transport generation and connections, the applicant undertakes approximately 4 vehicle trips per week to the site. The site is served by an existing access point to the northern boundary of the site, which leads from an informal parking area onto Castle Hill.

### *Design/Strategy*

The design/strategy section of the Management Plan is intended to demonstrate the overall layout of land uses and activities on the site. The proposal is for a single occupancy development. Three buildings are required – a dwelling, which is to be located to the east of the lower half of the site, a barn which will comprise a closed area for storage of hay and implements and night quarters for the geese, and a greenhouse which will support the horticulture element of the development. The fruit and vegetable growing area is in proximity to the house, and willow will be planted to provide biomass for the applicant's own use (fuel), material for the land-based business (weaving), to support the development of beneficial horticultural and agricultural micro-climates (screening).

It is noted that the proposed siting of the dwelling has changed from that in the 2015 submission, and that the layout of the proposed uses and path for the access has also changed as a result of this. The applicant states that the change in position is in response to members' concerns expressed at committee (9<sup>th</sup> March 2016) that the

size of the dwelling and its location at the top of the site would necessitate a long access track and the associated difficulty of moving building materials. Members at the time feared that such a track would require considerable maintenance which might require it to be concreted, and the narrow width of the track from its junction with the road, meant it was not accessible to emergency vehicles which was unsatisfactory.

In paragraphs 51 to 53 of the Inspector's decision, this issue was considered, with the Inspector concluding that;

*'I am concerned regarding the adequacy of the new access arrangements particularly as the highway it joins is a very steep and narrow single lane track with no footways or lighting along part of its length, thereby increasing the potential for vehicular and/or pedestrian conflict. Thus, I cannot conclude that an appropriate access can be achieved in line with Policy 53. Whilst my decision does not turn on this matter, and it may be possible to resolve this issue, it currently adds to my concern regarding the unacceptability of the proposal.'*

The revised siting of the dwelling to the lower northern half of the site results in a shorter access track, which would reduce the visual impact of this element. The dwelling itself would be bordered on two sides by stone walls, banks and trees, and the dwelling would be set down into the landscape. In terms of the wider setting, there are individual dwellings dotted across the settled lower slopes of Carningli, thus the setting would relate to the existing context.

However, the highway concerns expressed by the Inspector regarding the access from the site onto the single track lane (Castle Hill) still remain, and have not been specifically addressed in this current submission.

In addition to the Inspector's concerns, following consultation, a neighbour to the site provided evidence that Castle Hill is in private ownership, and raised concern that the applicant did not have the required right of access for vehicular access to an OPD.

Whilst the applicant has subsequently provided evidence to show that they have a right of access for agricultural purposes, it is unclear whether this would extend to use for residential purposes - One Planet Developments are –first and foremost in officers' minds - a highly specialised residential use.

Officers are doubtful as to whether the dispute over right of access is a planning matter - an applicant can apply for planning permission even if they do not own the land.

It is clear that the landowner of the lane is aware of the application and has objected to the application. It is not the Authority's function to resolve any dispute as to the ownership of or ability to use the lane, and it is considered appropriate to proceed with the application. A grant of planning permission would not outweigh the requirement for the applicant to resolve the access issue with the relevant land owner, whilst it is preferable to have full details of access arrangement between application sites and the public highway, it is not considered necessary for the applicant to demonstrate that they have the right of access across private land at this stage.

## Business and Improvement Plan

The OPD Practice Guidance states that the business and improvement element of the Plan is essentially the fundamental justification for the development, where it should describe how people on the land are able to reduce their environmental impact by meeting their everyday needs from the site, whilst also enhancing the environmental benefits of the site through their activities.

The Business and Improvement Plan was the main focus of the Inspector when reaching his decision at the previous appeal. In particular, concern was expressed at the lack of evidence that trial cultivation other than trial lavender beds has taken place, concluding that;

*‘20. Given the conditions that have been described, I am of the view that the success of the produce grown on the site will rely heavily on the creation of the raised planting beds by the appellant, which has the potential to be relatively time consuming and labour intensive. Together with the appellant’s lack of previous attempts of growing the range of fruit and vegetables anticipated in the Management Plan, and the likelihood of trial and error to determine what will grow, I have serious misgivings as to whether the yield from that which can be produced within the 5 year period will be sufficient to support the appellant’s basic food needs. ‘*

### *Land based activity*

Food and income for an occupant have to be derived from the land based resources of the site, which must be the results of the labours of the occupant of the site and not of hired hands. The land based activities on the site must, therefore, be capable of generating an income that would be sufficient to meet both the minimum income needs and minimum food needs of the occupant within five years of first habitation on the site.

The land based activity no longer includes the keeping of Balwen sheep, and bees; instead, the applicant proposes to rear geese for consumption, to grow willow for crafts and biomass, and to grow primroses which will be processed for sale as edible flowers. The previously proposed activities regarding the growing of lavender and keeping of chickens are retained. From the submitted Management Plan, the estimated minimum food needs of the applicant by Year 5 are £2121, with the estimated minimum income needs being £3433. The land based enterprises are projected to provide an income of £6434. Once established, the applicant estimates that the OPD will result in a total of 2299 land-based labour hours a year. (approximately 44 hours a week). No estimates are given for the initial set up of the OPD.

From the submitted information, the applicant considers that she has demonstrated that she would be able to meet her own basic needs from income derived from the site.

However, officers consider that there has to be some consideration of how realistic a planned activity is – particularly in light of the reservations expressed by the

Inspector in paragraphs 17 to 20 of the appeal decision, and concern remains that elements of the land-based activity are still subject to uncertainty as to their likely success. In respect of the lavender and primrose production, the projected income from these elements comprises 39% of the total income. The applicant has backed up her assertion that lavender can be grown at this location by referring to two existing Welsh lavender farms, both of which grow lavender at around 300m above sea level (this site is approximately 108 to 150 metres above sea level). Officers have looked at the websites of the lavender farms quoted, and have noted that as these farms have varying site conditions, they produce a wide range of cultivars as a result. In light of this, officers have concluded - taking into account both the Practice Guidance, and considerations of the Appeal Inspector, that the proposed land use activity submitted in the Management Plan does not adequately justify the siting of an OPD in the countryside. The Management Plan lacks sufficient detail and explanation in its consideration of the chosen varieties for planting, (which comprises over a third of the proposed income source) and underestimates the intensity of labour required of the applicant to get to, and to maintain the level of production required to support the proposal.

### *Land Management*

One Planet Developments in the open countryside have the objective of conserving, managing and, where possible, enhancing environmental quality – the baseline information is the benchmark for assessing the environmental impact of the development. As such, existing landscape features are expected to be retained, and opportunities taken to extend features such as hedgerows and woodland, which could expand wildlife corridors. Views to, from, and within the site are important, as it would be expected that new development would blend into the surroundings so as not to detract from the original landscape character. The position of new buildings should, therefore, be chosen so that they would not be obtrusive in the landscape, ie by using the existing lie of the land or tree/hedgerow cover. New planting can provide screening in addition to improving local micro-climates and offering shelter.

The applicant indicates that the existing stone boundaries, hedges and trees will be retained at the site. New hedgebanks will be established using earth excavated from the site of the dwelling for further screening. Short rotation coppice willow will be established to the north and east of the site – this will supplement the proposed solar harvesting to provide heating. An orchard will be established to the north eastern corner, and two new groups of deciduous trees are proposed which, when established, will provide natural shelter for livestock.

The proposed trackway has been sited along the lower eastern side of the site, and is intended to be a grass reinforcement mesh track (as already installed to the neighbouring OPD)

In terms of land management, 34% of the application site will be grazed. Biomass, orchard and new woodland areas will comprise 32% of the land. The developed areas – dwelling, barn, greenhouse, curtilage, track and parking comprise 11% of the land. Horticulture and poultry will be 16% of the site and natural regeneration will be 7%. The balance of management is in favour of grazing and additional tree planting,

which officers consider is in keeping with the character of the area, as set out in the Baseline section for the site.

### *Energy and Water*

The energy needs of the site must be minimised and met from sources or renewable energy on site. OPD Guidance allows for small amounts of non-renewable fuel for purposes such as bottled gas for cooking in warmer months where wood stoves are not lit, or for running agricultural machinery/equipment, and these fuels would be accounted for in the ecological footprint of the development

The applicant has estimated an average electricity usage to be approximately 1 kWh per day, which would be met by the installation of seven 250W solar panels on the southern facing elevation of the dwelling. The system will be connected to a battery reserve which would balance out the production and demand through the year.

For the dwelling, heating is primarily sourced by passive solar primarily from the greenhouse area to the south and east corner of the house. This will be supplemented by a wood fired range, fed by biomass sourced from short rotation coppice willow which will be grown on site.

In respect of water usage, the applicant indicates that the predicted domestic water use will be no more than 1500 litres per month. Water will be mainly sourced from rainwater harvesting from the barn and greenhouse – ‘clean’ rainwater collected from the polycarbonate areas of roof will be filtered for domestic use, whilst ‘muddy’ rainwater collected from turfed roof areas will be used for horticulture. No water will be abstracted from the adjacent streams for domestic use.

It is considered that the Management Plan is reasonable in this respect and adequately addresses the issue of energy and water usage at the site.

### *Waste*

It is an essential characteristic that all waste produced on One Planet Developments should be assimilated on site in sustainable ways. The applicant indicates that all domestic food waste will be composted, that grey water will be filtered before being returned to ground, a dry composting toilet will be used in the house, with the solids composted and the liquid diluted and watered to the garden and fields. Packaging and paper will be reused/recycled, timber waste from the coppice willow will be used as mulch and livestock manure will be composted.

It is considered that the Management Plan is reasonable in this respect and adequately addresses the issue of waste.

### **Zero Carbon Buildings.**

OPD's should share the aspirations set out by the Welsh Government to achieve development that is, or is close to, zero carbon in terms of construction and use.

The applicant proposes a single dwellinghouse, which will be of a 'quarter' curved shape and appearance and two storey in height. The ground floor will comprise a hall, bathroom, 2 bedrooms and a conservatory, with a kitchen, living area and study at first floor. A porch at the first floor will lead onto a short bridge, which leads out to the parking area.

In the supporting information, a Code for Sustainable Homes materials assessment has been undertaken. Whilst the Code is no longer used in the planning system, it remains an objective approach to the assessment of the building materials to be used. The wood is to be sourced from Boncath, with fenestration to be recycled units. This assessment points to clay and stone being sourced from the site – no information is attached to advise where this material is to be used and whether sufficient material can be sourced from the site without harming or changing the environmental character of the site. The submitted drawings only show a timber elevation for the dwelling, and question 10 on the application form does not specify clay or stone finishes to the external walls..

In light of this, officers have concluded that with regard to the submitted information on zero carbon buildings, the application provides insufficient information as to the proposed finishes for the dwelling, and to assess whether the sourcing of building material from the site is reasonable in terms of the scale of the excavation required, the impact on the landscape and the impact on local drainage and surface water runoff which could result. This calls into question whether the evidence submitted to support the assertion that the dwelling will be close to zero carbon is accurate and can be relied upon.

### **Dwelling siting and design**

The Inspector in the previous appeal did not discount the modern design in the appeal decision, however, this was in relation to the original siting, which was more comprehensively screened by existing mature trees and planting.

In terms of the wider landscape setting, there are individual dwellings and outbuildings dotted across the settled lower slopes of Carningli, thus the setting of the proposed dwelling and its associated structures would relate to the existing context of the lower Carningli slopes. Officers therefore conclude that the siting and design of the proposed dwelling can be reasonably assimilated into this sensitive landscape, without significant harm to the character of this location.

### **Community Impact Assessment**

OPD should not impact negatively on neighbouring communities and should not be insular; and Local Development Plan policy requires such developments to demonstrate significant public benefits. The applicant already lives locally and considers herself to be part of the local community. Her range of produce would not replicate that already available in the locality, and through offering opportunities to visit the site –either as part of an arranged guided tour or tailored consultation, would aim to inspire others to lower their ecological footprint and adopt a more sustainable lifestyle.

Officers conclude that there would be no negative impact on the neighbouring community and that the application has demonstrated sufficient community interaction for the OPD to be assimilated into the community.

### **Transport Assessment and Travel Plan**

As OPD's in the open countryside are intended to be self-sustaining, it is anticipated that there would be a little need for residents to travel off-site and for many goods to be brought to the site. Transport movements are likely to be generated by the occupant, by the on-site enterprise and by visitors.

The applicant has stated that living in Newport is sufficient for her needs – there is a frequent bus service between Newport and Fishguard/Cardigan/Haverfordwest, there is a comprehensive network of footpaths in the area, and from using a travel diary, she has a commitment to halving the average number of trips and mileage that would ordinarily be undertaken by a rural resident.

However, the applicant will still run a private vehicle, which she states is required to transport livestock, feed and hay. In the breakdown of the applicant's minimum income requirements in the Management Plan, the travel spend is not shown to reduce over the projected 5 year period. This would be considered contrary to the policy guidance where travel cost and trips by private car – especially where these are single occupancy - should be reduced.

Officers consider that this element of the management plan is contrary to OPD guidance and does not demonstrate a clear reduction in the use of private car usage or its single occupancy for trips.

### **Ecological Footprint Analysis**

The applicant advises that their current ecological footprint is 4.8 global hectares (against a quoted national average of 3.6 global hectares). Using the Welsh Government Ecological Footprint Analysis tool, the applicant has projected that they would achieve a footprint of 2.13 global hectares in 5 years, with potential to reduce this to the Welsh target of 1.88 global hectares.

However, whilst the calculator has predicted a reduction in the footprint (based on expenditure), officers are concerned that actual travel costs do not appear to be reducing in practical terms. Statistics from the Welsh Government in 2013 stated that on average, people living in Wales take almost a thousand trips a year and travel around 7,500 miles or around 144 miles a week, with 69% of these being by car. The applicant states that they undertake to generate no more than 822 vehicle trips for domestic activities per year (based on an England average of 1644 trips in rural area).

Officers consider that this element of the Management Plan does not demonstrate clearly the travel element of the ecological footprint analysis is robust or of sufficient reduction to be in accord with OPD guidance.

## **Phasing, Monitoring and Exit Strategy**

### *Phasing*

The Management Plan is unclear as to the proposed phasing of the development. In the overview of the land-based enterprises on p.34 of the Plan, it is stated that the applicant will concentrate on building the barn, track and house in the first few years, then concentrate on building up the income streams once the core infrastructure is in place.

In the Management Plan (p.70) this shows that the applicant intends to concentrate on the construction of the barn, dwelling and access, together with the planting of the lavender beds and willow in the first year. Officers consider that the food growing areas should be established earlier on than is proposed, so that the applicant would have sufficient produce to live on and to sell/barter when living on site. It is also not specified whether the applicant will require any structures as temporary accommodation in the initial stages.

### *Monitoring*

The applicant has identified the essential criteria required for monitoring (which is set out in the Practice Guidance), and intends to provide an update to the data provided in the original Management Plan in the annual monitoring report. A commitment to re-assess the ecological footprint analysis is also included.

### *Exit Strategy*

The chosen strategy addresses both the bio-degradable and non-biodegradable elements of the development. The applicant has stated that the dwelling has been designed so as to be reversible, and that natural products would be left on site to compost.

However, whilst the materials used in the development are identified and a strategy for either sale or recycling listed, there are no timescales offered, which means that materials could be on-site for long periods either awaiting sale or collection. Officers would expect clear timescales to be given – as would be the case for other planning permissions such as renewable energy schemes – in order to ensure that the site is clear and returned back to its original condition in a timely fashion.

## **Conclusion**

Having considered the application in detail, officers consider that the Management Plan does not fundamentally demonstrate sufficient information to justify the location of this proposed One Planet Development in the open countryside. The applicant does not demonstrate sufficient evidence to support the chosen land-based activities; an accurate balance of labour with regard to the timing of growing stock as opposed to the development of the dwelling; that safe shared vehicular and pedestrian access between the site and the public highway and along the public highway can be achieved; accurate information in respect of the materials for the proposed dwelling (and thus the accuracy of the information supporting the zero

carbon status of the dwelling); the reduction in transport costs and vehicle trips expected for a low impact lifestyle and a clear timeline for exiting the site should the development fail to meet its requirements. It is not considered that these issues could be addressed by planning condition as the issues are fundamental to the planning application. As such, the application would not be in accordance with requirements of national and local planning policy, and the application cannot be recommended for support.

### **Recommendation**

That the application be refused for the following reasons:

1. Inadequate and conflicting information has been provided in the submitted Management Plan in respect of land-based activity and projected work hours, access for vehicles/pedestrians, the timeline for the development, transport cost and travel trips, zero-carbon buildings and a timeline for the proposed Exit Strategy. As such, the proposal is contrary to the requirements set out in Planning Policy Wales (Edition 9) Chapter 9 – Housing, Technical Advice Note 6 – Planning for Sustainable Rural Communities, and the Pembrokeshire Coast National Park Local Development Plan Policy 47.(Low Impact Development).
2. The development, if permitted, would create a new unit of residential accommodation in the open countryside without adequate justification. It is the policy of Welsh Government and the National Park Authority to resist such development in the countryside in the interests of the proper planning of the area, unless there are exceptional and proven circumstances. As such, the proposal is contrary to Planning Policy Wales (Edition 9) Chapter 9 – Housing, Technical Advice Note 6 – Planning for Sustainable Rural Communities, and the Pembrokeshire Coast National Park Local Development Plan Policy 7 (Countryside).
3. The application, if permitted, would result in a highway safety hazard in terms of pedestrian and vehicular conflict along the highway and the application site.. The proposal fails to demonstrate adequate provision to ensure the safety of pedestrians and other road users when vehicles are entering or exiting the site, contrary to the Pembrokeshire Coast National Park Local Development Plan Policies 52 (Sustainable Transport) and 53 (Impacts of Traffic).

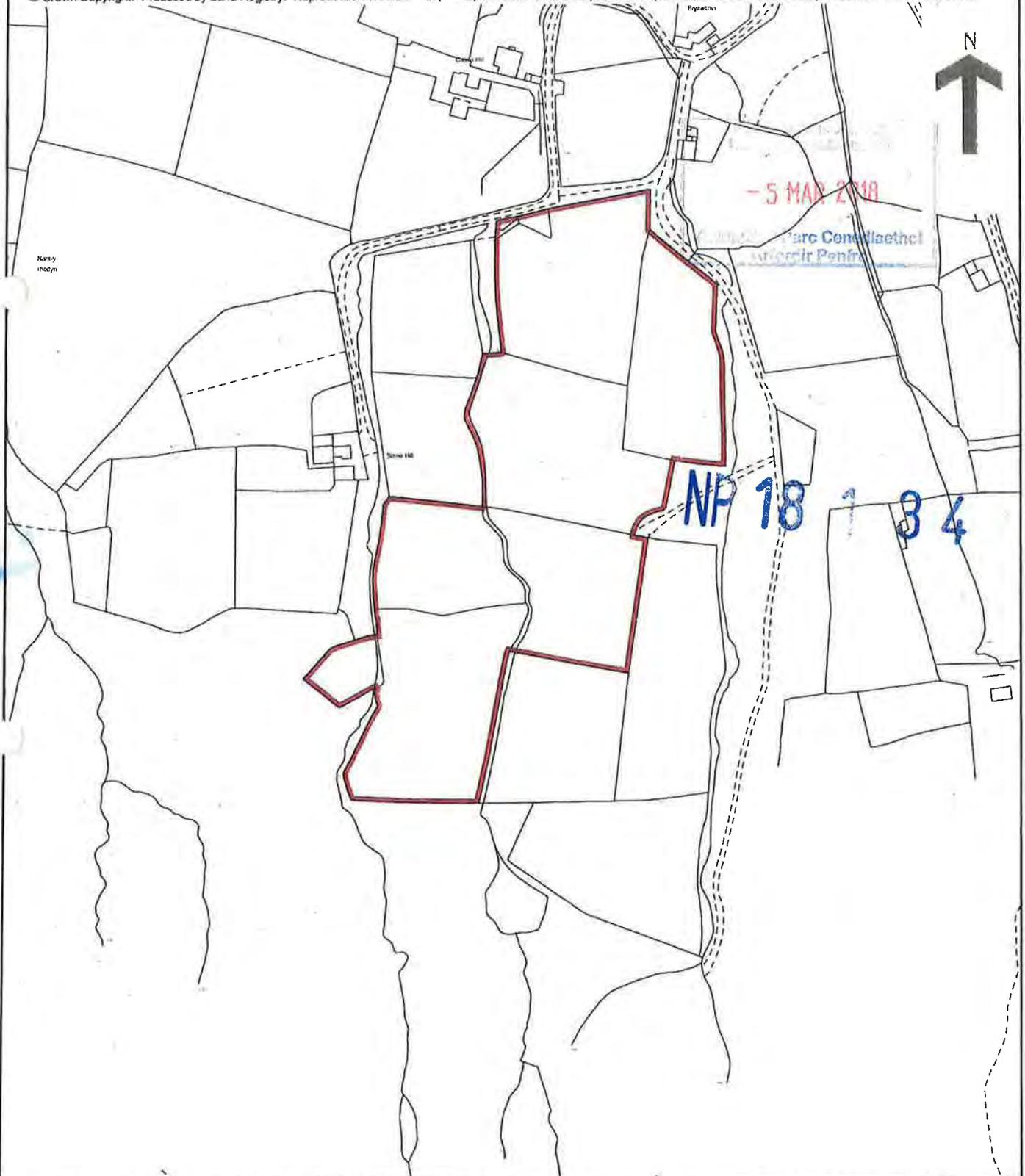
# Land Registry

## Official copy of title plan

Title number **CYM535061**  
 Ordnance Survey map reference **SN0538SE**  
 Scale **1:2500**  
 Administrative area **Pembrokeshire / Sir Benfro**



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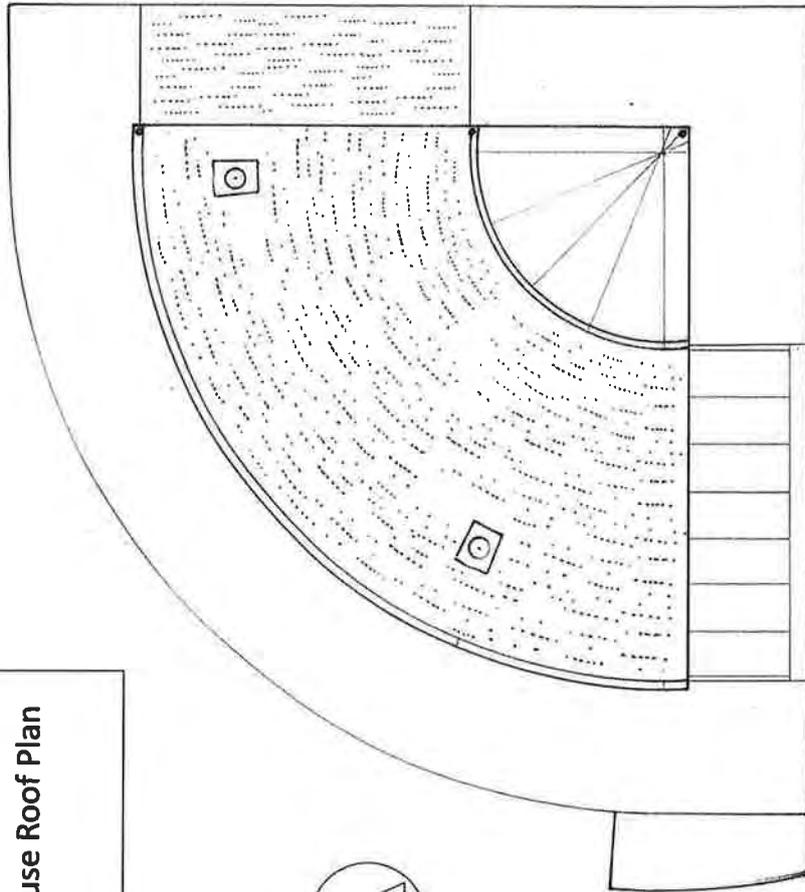
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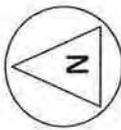
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- 5 MAR 2018  
Asociadur y Cenedlaethol  
Llywodraeth Penfro

NP 18 1 34

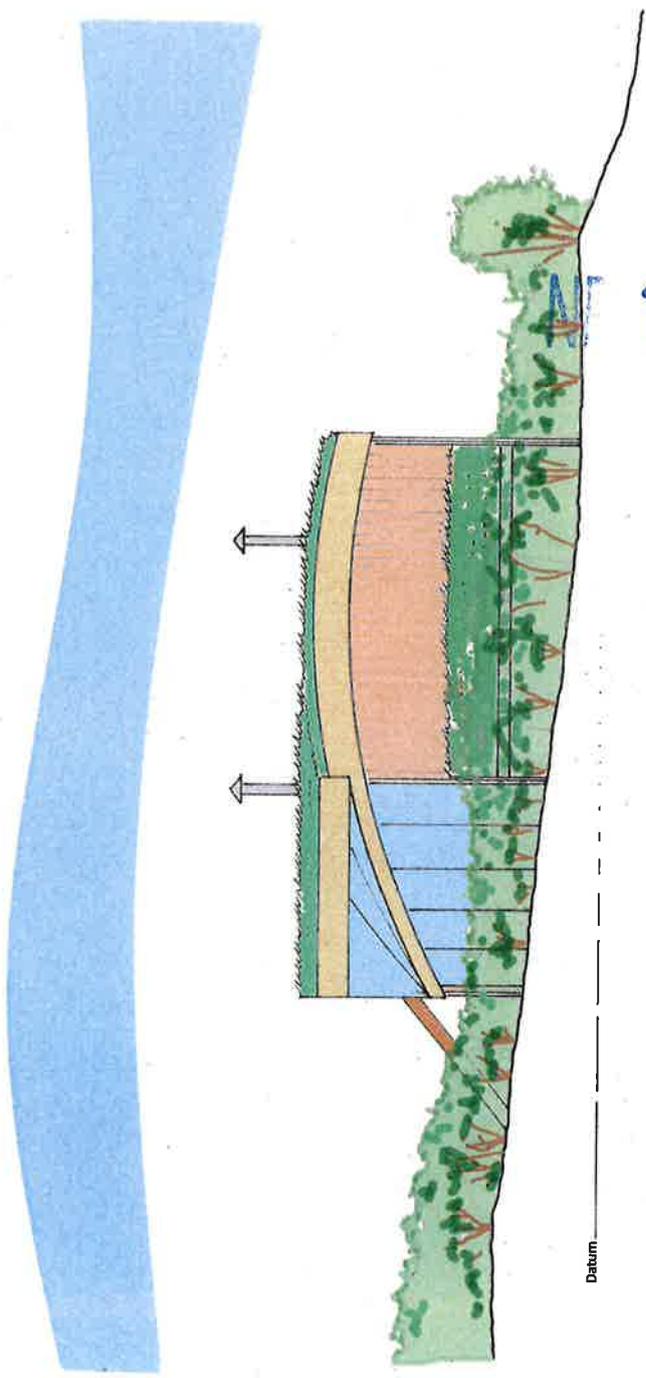
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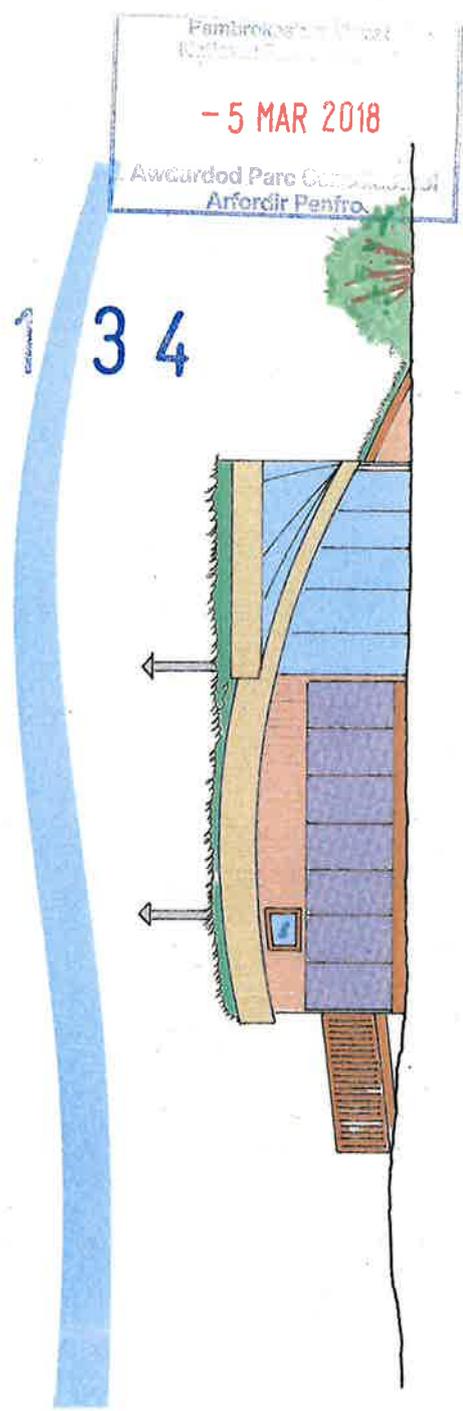
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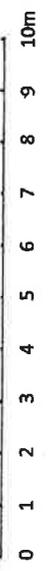


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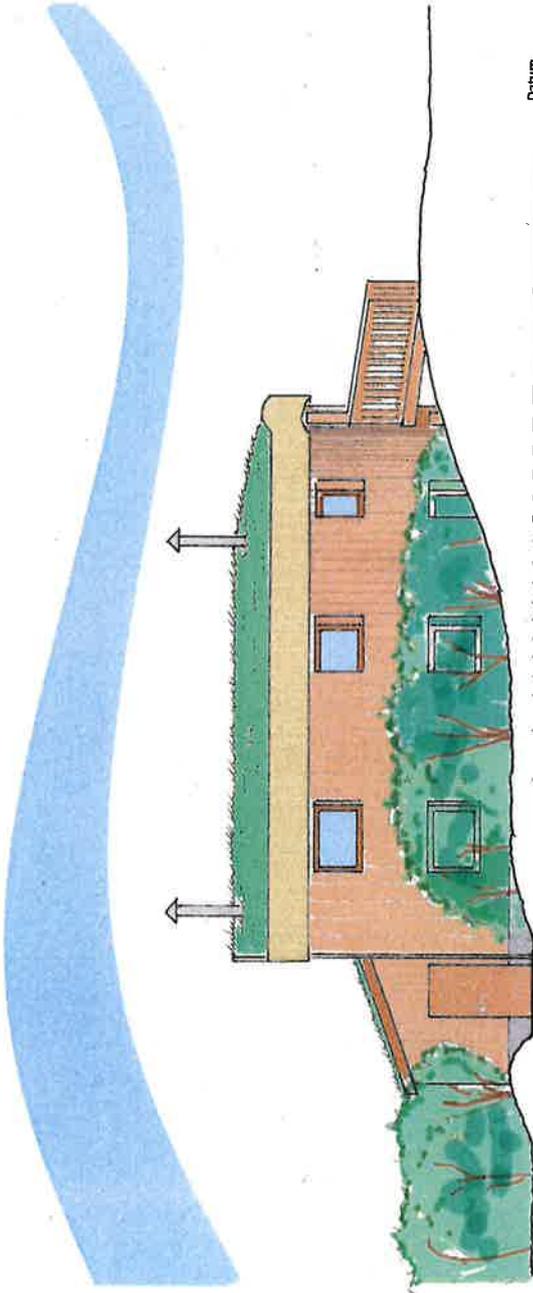


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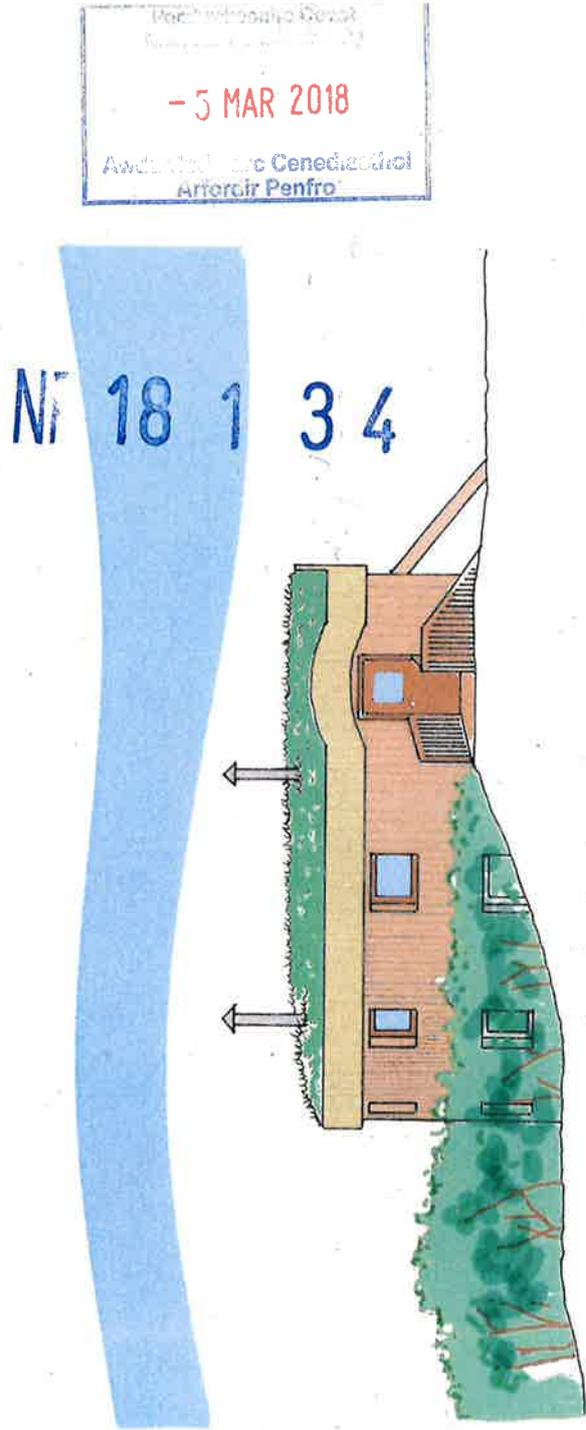
Pembrokeshire Council  
 - 5 MAR 2018  
 Awdurdod Parc Cymunedol  
 Arfordir Penfro



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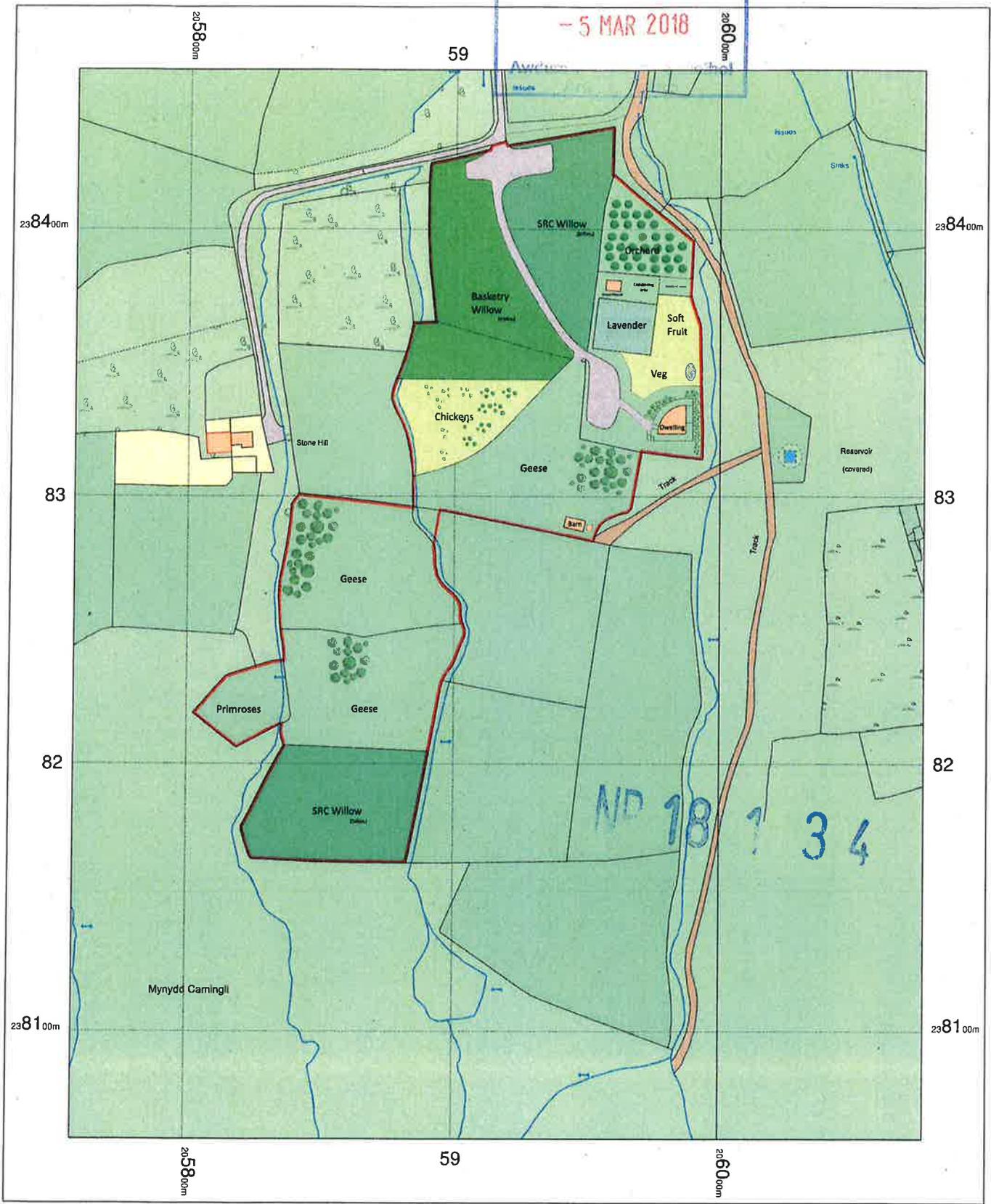


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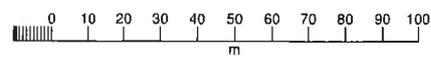


West

- 5 MAR 2018



Carningli Sylvan

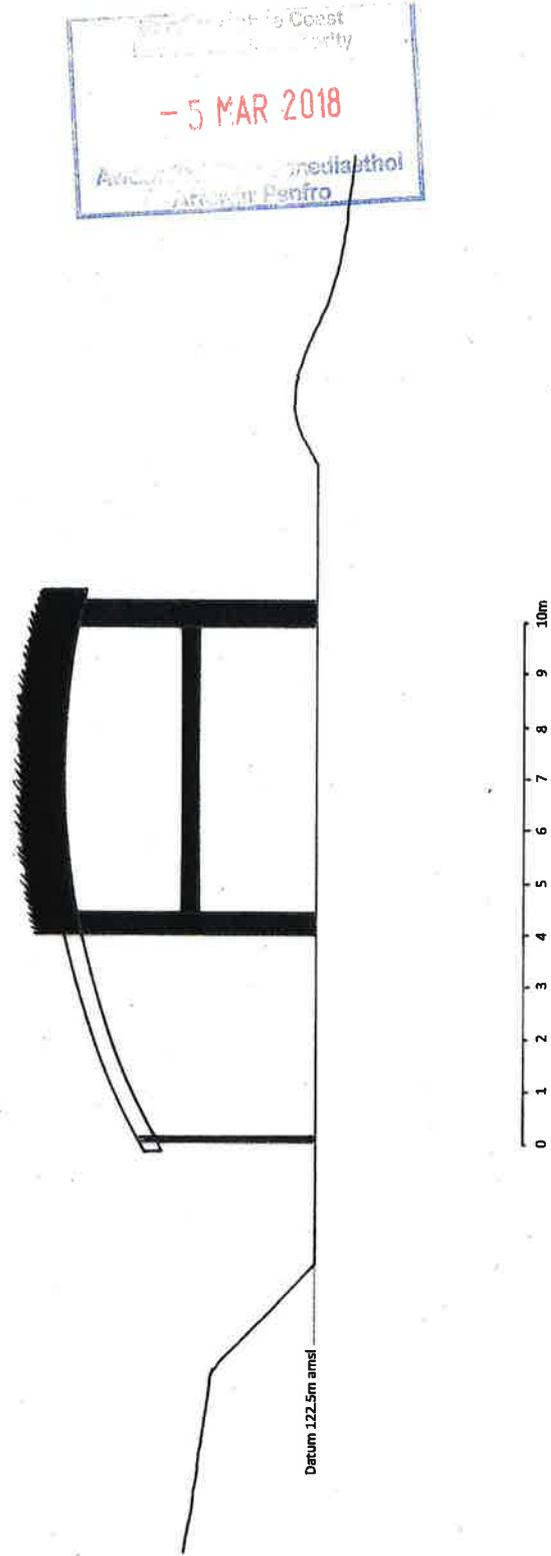


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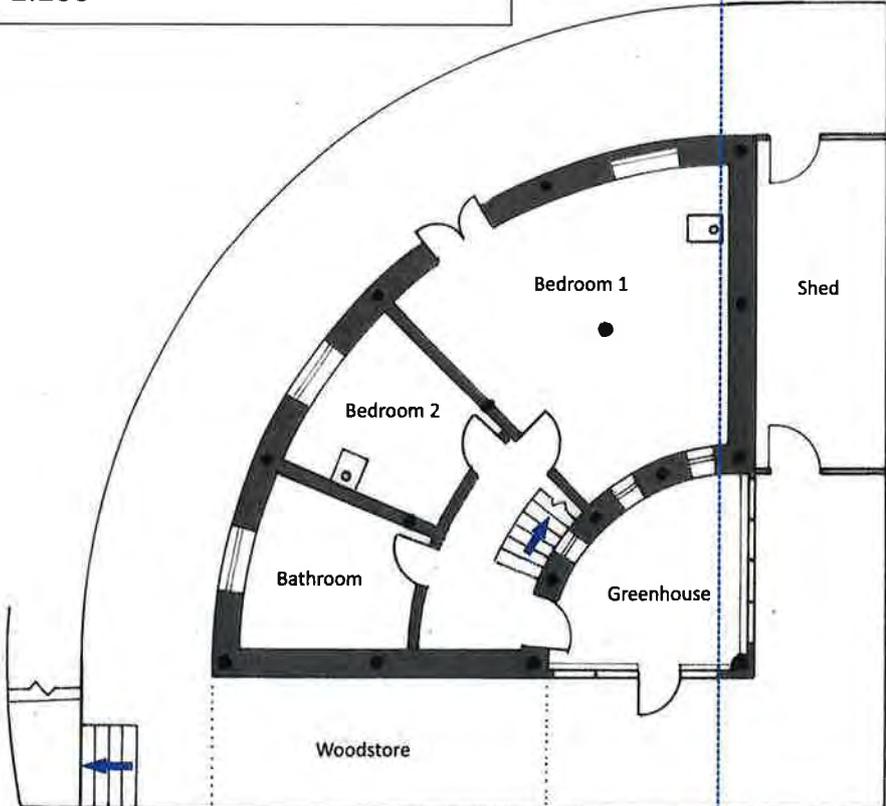
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Drawing 2.4  
Dwellinghouse Section  
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- 5 MAR 2018  
Arfordir Parc Cwmwl  
Arfordir Penrhos

Carningli Sylan  
Drawing 2.1  
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1:100

NP 18 34

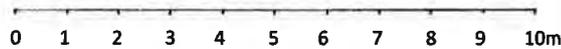
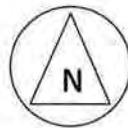
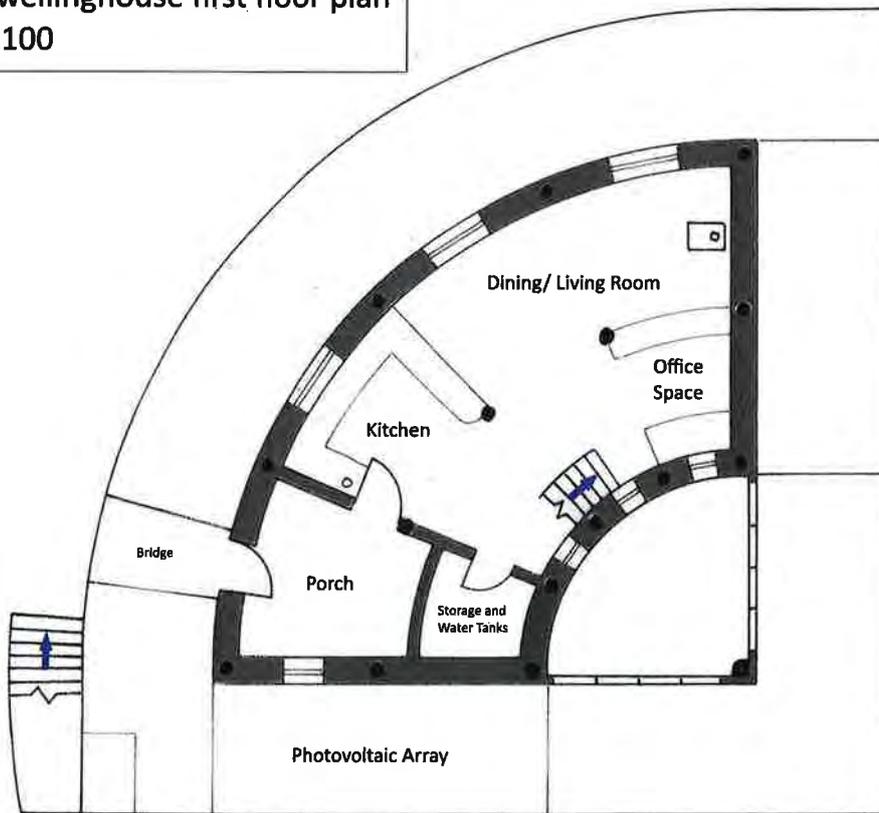


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Plan  
- 5 MAR 2018  
Awdurdod Parc Cwm Ceredigion  
Arfordir Penryn

NP 18 1 34

Carningli Sylvan  
Drawing 2.2  
Dwellinghouse first floor plan  
1:100



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## Penderfyniad ar yr Apêl

Gwrandawriad a gynhaliwyd ar 01/11/16  
Ymweliad â safle a wnaed ar 01/11/16

**gan Melissa Hall BA (Hons), BTP, MSc,  
MRTPI**

**Arolygydd a benodir gan Weinidogion Cymru**  
**Dyddiad: 01.02.2017**

## Appeal Decision

Hearing held on 01/11/16  
Site visit made on 01/11/16

**by Melissa Hall BA (Hons), BTP, MSc,  
MRTPI**

**an Inspector appointed by the Welsh Ministers**  
**Date: 01.02.2017**

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**Appeal Ref: APP/L9503/A/16/3150135**

**Site address: Land adjacent to Castle Hill, Newport, Pembrokeshire SA42 0QE**

**The Welsh Ministers have transferred the authority to decide this appeal to me as the appointed Inspector.**

- 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 Ms. Susan Gillooley against the decision of Pembrokeshire Coast National Park Authority.
  - The application Ref NP/15/0310/FUL, dated 3 June 2015, was refused by notice dated 17 March 2016.
  - The development proposed is described as '*Eco-smallholding, including one dwelling – One Planet Development*'.
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### Decision

1. The appeal is dismissed.

### Application for costs

2. An application for costs has been made by the appellant against Pembrokeshire Coast National Park Authority. This application is the subject of a separate Decision.

### Procedural and Preliminary Matters

3. Although the officer recommendation was one of approval subject to conditions, the application was deferred at the Development Management Committee meeting of 27 January 2016 and, following a site visit on 2 March 2016, planning permission was refused at the subsequent meeting of 9 March 2016. The minutes of the meeting record that Members expressed concern, in particular, regarding the size of the dwelling and its location at the top of the site necessitating a long access track, the economic viability of the Management Plan and the appellant's ability to meet the 65% self-sufficiency requirement. Members also took issue with its impact on the location and setting in a highly sensitive landscape in the National Park (NP) and the introduction of a residential element and associated travel to and from the site which would intensify the use of the site.
  4. However, from my reading of the Authority's reference to the Management Plan in its reason for refusal, it is merely concerned with whether it is sufficiently robust to ensure that the application site would be managed in a way that would retain and
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enhance the special qualities of the National Park (NP). It does not specify the aspects of the Management Plan with which it takes issue.

5. Put another way, the reason for refusal focuses primarily on landscape harm and the need to maintain and enhance the special qualities of the NP. It is in its Statement of Case that the Authority identifies two main issues. Paragraph 4.2 of the Statement of Case reads:

*'The two main issues which underpin the NPA decision are whether or not the proposed development satisfies the very demanding requirements of LID [Low Impact Development] and OPD [One Planet Development] policies and guidance to justify making exception to the general policy of strict control of development in the countryside and whether or not the impacts of the development on this locality and community in the National Park are acceptable'.*

6. In the context of the above, and as elaborated upon at the Hearing, the Authority is concerned about whether the proposal satisfies national and local planning policy requirements in respect of One Planet Development in addition to the impact of the development on the special qualities of the NP. From my understanding of the Authority's evidence, the specific aspects of the Management Plan with which it is concerned relate primarily to the Land Based Activities.
7. I note the appellant's concern that new matters were introduced during the appeal process and at the Hearing. I do not dispute that the main issues identified in the Authority's Statement of Case are wider than that identified in the reason for refusal. Nevertheless, I am satisfied that the appellant had sufficient time to respond to the additional matters raised by the Authority prior to, and during the course of, the Hearing. Thus I do not consider that any party has been prejudiced.

### **Main Issue**

8. The main issue is whether the proposal satisfies national and local planning policy requirements in respect of One Planet Development and its impact on the special qualities of the Pembrokeshire Coast NP<sup>1</sup>.

### **Reasons**

9. Planning Policy Wales (PPW) defines One Planet Development (OPD) as development that through its low impact either enhances or does not significantly diminish environmental quality<sup>2</sup>. It advises that *'Land based OPD located in the open countryside should provide for the minimum needs of the inhabitants in terms of income, food, energy and waste assimilation over a period of no more than 5 years from the commencement of work on site'*<sup>3</sup>.
10. Technical Advice Note 6 *'Planning for Sustainable Rural Communities'* (TAN 6) requires planning applications for land based OPD in the open countryside to be evidenced by a Management Plan setting out the objectives and operational basis of the proposal, which includes a business and improvement plan, ecological footprint and carbon

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<sup>1</sup> Having regard to the statutory purpose of National Parks to conserve and enhance their natural beauty, wildlife and cultural heritage and to promote opportunities for public understanding and enjoyment of their special qualities.

<sup>2</sup> Paragraph 9.3.11

<sup>3</sup> Paragraph 9.3.12

analysis, biodiversity and landscape assessment, community impact assessment, transport assessment and travel plan<sup>4</sup>.

11. The OPD elements of TAN 6 are supported by the '*One Planet Development Practice Guidance*', which sets out all the requirements for an OPD application. Para 3.18-3.21 of the Practice Guide states that food and income have to be derived from the land based resources of the site; this is the basis of the need to live on site and the reason why the site should be the sole residence of the occupants.
12. LDP Policy 47 deals specifically with low impact development. It states that low impact development in the countryside that makes a positive contribution will be permitted where it meets the specified criteria. The Authority's adopted Supplementary Planning Guidance '*Low Impact Development*' makes reference to OPD insofar as it is the term used in national planning guidance when referring to low impact development.
13. The LDP is largely consistent with national planning guidance in respect of OPD notwithstanding that it was adopted prior to the OPD Practice Guidance. However, the Authority contends that the LDP sets out more detailed policy and criteria relevant to the local context for this type of development reflecting the 'special status' of the Pembrokeshire Coast National Park (NP) and deals with standard planning matters which are not considered or applied to local circumstances in the national planning policy guidance.

#### *Business Plan*

14. TAN 6 requires that how the inhabitants' requirements in terms of income, food, energy and waste assimilation can be obtained directly from the site be quantified. The land use activities proposed must be capable of supporting the needs of the occupants, even on a low income or subsistence basis, within a reasonable time and no more than 5 years.
15. The Practice Guide requires a site to produce at least 65% of basic food needs of the occupants or that a minimum of 30% should be grown and/or reared on the site whilst the remainder can be purchased or bartered using the income or surplus produce from other produce grown and/or reared on the site. The Guide explains that the strong emphasis on growing / rearing produce underlines the essential land based and subsistence nature of the OPD.
16. The appellant's evidence includes the Carningli Sylvan Management Plan dated April 2015 together with an independent appraisal of the Management Plan by Geo & Co dated September 2016. It identifies that the appellant intends to be mostly self-sufficient in terms of fruit and vegetables, and totally self-sufficient in respect of meat and eggs, by Year 5. The appellant also intends to produce honey, jams and preserves, fruit cordial and hedgerow wine.
17. I am told that the site is classified as Grade 4 agricultural land and that soil conditions are poor. At the Hearing, Members representing the Authority drew on their knowledge of the local conditions and personal experience of traditional horticultural practices; it was explained that site's uplands position is exposed and subject to the salt laden prevailing winds hence, for example, fruit trees would only grow to a

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<sup>4</sup> Sections 4.15-4.23 of TAN 6.

restricted height (if at all) and it is likely that poly-tunnels would be required to shelter plants from the windy conditions that have been described.

18. Nevertheless, at the Hearing, Mr Wimbush described in detail how the depth and quality of the soil can be increased, concentrated and maintained in the growing areas, thus creating a micro-climate in which potential growth can be maximised. I also observed that a limited range of fruits and vegetables are being grown in raised planting beds on the adjacent land at Beeview Farm. I do not dispute, therefore, that it may be possible to grow certain fruits and vegetables on the site in specific conditions.
19. Be that as it may, the Geo & Co appraisal states that the appellant has owned the site since 2011 which has enabled her to observe local conditions and to start to plant various trees and fruits. However, apart from several rows of lavender plants on the site (which have been grown with varying degrees of success), I saw no evidence that any other trial cultivation has taken place. The appellant told me that she has had little experience of other production on the site<sup>5</sup>. Consequently, there is much uncertainty as to what can be grown and on what scale and whether the yields will increase annually.
20. Given the conditions that have been described, I am of the view that the success of the produce grown on the site will rely heavily on the creation of the raised planting beds by the appellant, which has the potential to be relatively time consuming and labour intensive. Together with the appellant's lack of previous attempts of growing the range of fruit and vegetables anticipated in the Management Plan, and the likelihood of trial and error to determine what will grow, I have serious misgivings as to whether the yield from that which can be produced within the 5 year period will be sufficient to support the appellant's basic food needs.
21. The appellant also states an intention to keep bees. I am told that there is one bee hive currently on the land, which has been in situ approximately 2.5 years and has survived the cold and inclement weather (albeit has not produced any honey). I heard that a second hive is needed in order to increase the thriving colony of bees.
22. Be that as it may, I saw that adjacent OPD development, Beeview Farm, currently has in the order of 17 hives on the land. The occupants told me that they have in the order of 30 hives in total, but that 17 is potentially the maximum that can be located on the site due to the availability of foraging within a range of some 3-5 miles.
23. It is therefore my understanding that the appeal site is unlikely to be able to support a significant increase in the local bee population given the size of the existing population and the availability of foraging. I also heard concern from the Authority regarding the indemic mite that affects the bee population of which the appellant has little experience. Hence, there is sufficient doubt in my mind as to whether the keeping of bees to produce honey to meet the appellant's food and income requirements, in part, is realistic.
24. I am also aware that the appellant intends to expand the existing head of sheep from 9 to 13 and to produce meat. The Authority considers the consumption of only 2 organic lamb per year to be underestimated. On the basis of the evidence before me, I also could not say with certainty whether this modest consumption is accurate.

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<sup>5</sup> Contrary to the view held by Bill Knight at paragraph 5.5 in the appellant's Response to the LPA's Statement of Case.

25. Turning to the appellant's proposals to keep Araucana chickens for eggs and poultry. Whilst the Authority's agricultural advisor considered the anticipated egg production to be realistic, he questions the suitability of the bird for consumption. I cannot therefore rely on the contribution that the poultry would make to meeting the appellant's food needs.
26. In light of the shortcomings I have identified, I consider it optimistic to expect that 65% of the appellant's food could be grown or reared on this site within a period of 5 years.
27. The OPD Practice Guidance states that the Management Plan should provide a simple balance sheet demonstrating how sufficient income will be generated to meet the basic income needs of occupants. This will be based on projections of the anticipated income from sales of produce from the site<sup>6</sup>.
28. 'Income needs' means that the site needs to generate enough income to pay for the basic requirements of the site's resident(s) which the site is unable to provide directly<sup>7</sup>.
29. The appellant has stated in the Management Plan her intention to start a range of land based micro businesses, which would provide the minimum income requirements. This includes keeping chickens for selling eggs, rearing Balwen sheep with an intention to produce 20 lambs per annum for market and using the fleece for wool crafts, the keeping of bees to produce honey and the growing of lavender plants for sale, crafts / food and for the production of lavender honey.
30. Although the Authority's agricultural advisor considers that the increase in the head of sheep is realistic, he contends that the anticipated sale price of the lambs given by the appellant is excessive; he states that £120 per lamb is a rather high figure as heavyweight lowland breeds are averaging £80 per head. The appellant has provided evidence from the Balwen Society for the price at auction of Balwen sheep from 2015, which shows that the price per lamb put forward by the appellant appears plausible.
31. In respect of lavender growing, the appellant expects to take cuttings to sell and explore lavender based crafts, which would generate an annual income in the region of £1,000 respectively. However, given the varying degrees of success of the existing lavender that has been growing on the site over the last couple of years, I am not convinced that the site could sustain anticipated production levels in the long term and that the related enterprises will be as successful as the appellant would like.
32. In terms of the honey that the appellant intends to sell, given the likely difficulty in supporting an additional bee population which would produce the amount of honey necessary to achieve the anticipated returns, I do not find this to be a realistic source of income.
33. The appellant intends to undertake wool crafts using the fleece from the Balwen sheep which would be processed off-site. It is the intention to knit 10 pairs of socks / legwarmers, 10 pairs of gloves and 10 hats, which would sell for between £20 and £30 each. In my opinion, the estimated time taken to produce these goods seems underestimated particularly as the appellant states that the items would be knitted in the winter months (rather than year-round). Furthermore, the cost of the knitted goods

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<sup>6</sup> Para 3.29

<sup>7</sup> Para 1.12 (2) of the OPD Practice Guidance provides examples of such requirements, including clothes, travel, IT/communications, Council tax and the food needs not covered by the produce grown or reared on the site.

seems excessive. There is no evidence from local shops or online market-places that the anticipated income is realistic.

34. I have been provided with details of the current (2014) household income needs and the Year 5 projected needs; the need projections in year 5 are significantly less than the baseline year of 2014. Given my reservations regarding the potential for growing / rearing produce on the site, I have serious doubts regarding the anticipated reduction in purchased foodstuff due to increased on-site food production. Neither am I persuaded that the projected land based income is supported by a robust analysis to demonstrate the likelihood of achieving the yields and/or sales values of the various components, such that it would be sufficient to meet the identified income needs of the occupant.
35. I am also mindful that the appellant will be the sole occupant and she has stated that she will concentrate on constructing the dwelling, the barn and the track in the first few years before building the income streams thereafter. The assessment produced by Geo & Co identifies that it appears very likely that there will be in excess of one person's full time input<sup>8</sup>. The period in which the appellant has the opportunity to grow and rear produce to meet her food needs and identified income needs, would therefore be much reduced and beyond Year 3 and potentially subject to additional input if the labour requirement is to be met.
36. I recognise that there will inevitably be a degree of uncertainty in OPD developments not least as occupants are trialling new ways of working, and that it is quite different from traditional agricultural practices. Whilst I do not dispute the good intentions of the appellant, and although some elements of the business plan may be viable, I am not convinced that the necessary output can be realised. Taking these factors into account, I treat the appellant's claim that a minimum of 65% of the basic household needs from the resources and activities on the site would be met by 2018 with considerable caution. Consequently, I am not satisfied on the balance of probability that the occupier's requirements in terms of income and food can be obtained directly from the site.
37. It therefore follows that the proposal is not compliant with the Practice Guide, insofar as OPD in the open countryside which fails to support the minimum income and food needs of the occupant cannot justify, in planning terms, a need to live on the site. Such development represents an exception to the restriction on new residential development in the open countryside outside settlement limits. They should not therefore be permitted unless these requirements are met.
38. For the reasons I have given, I find that the proposal does not satisfy the requirements in terms of the need to provide for the minimum needs of the inhabitants in terms of income and food. I thus have reservations about the site's suitability for an OPD. In this regard, it conflicts with national planning policy, LDP Policy 47 and the Authority's SPG.
39. At the Hearing the Authority introduced new verbal evidence regarding the lack of allowance in the Management Plan for adverse circumstances and a concern that not all expenditure had been accounted for. However, there was no compelling evidence before me to substantiate the Authority's concerns in this regard.

*Impact on the character and appearance of the NP*

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<sup>8</sup> Para 2.5.30 of the Geo appraisal.

40. The Authority states that the proposed development would not make a positive contribution to the site. Rather, it would introduce a residential use and associated requirement for travel, which would impact negatively on its location and on its setting within a highly sensitive landscape within the NP.
41. The site is located outside the Identified Centres described in Policy 7 of the LDP. As a consequence of not meeting the OPD requirements (criterion g of Policy 7), it therefore represents an unjustified form of residential development in the open countryside and does not constitute one of the other exceptions listed. It is not required for essential farming or forestry purposes nor does it constitute a rural enterprise dwelling in line with TAN 6. Neither is there any evidence before me that it would meet an unmet affordable housing need. Thus, I am not persuaded that allowing a more widespread distribution of unjustified residential development in the countryside outside existing settlements would safeguard its character.
42. The Authority states that the landscape is 'highly sensitive'. I note that it lies within the Registered Historic Landscape of Newport and Carningli as contained in the Register of Landscapes of Special Historic Interest in Wales. Its characteristics are described in the Landscape Character Assessment as an upland agricultural landscape with scattered farmsteads throughout, with the scenic value of the landscape classified as high. Thus, I do not dispute its qualities and the positive contribution that it makes to the natural beauty of the NP.
43. The Authority is concerned with public views into the site. From coastal views towards the uplands area, the site is seen in the distance and is, in part, screened by existing landscape features. At my visit, I observed the position of the public footpath network linking Carn Ingli with Newport<sup>9</sup> which, at its closest point, runs out to the common beyond the western boundary of the appeal site. It therefore runs closest to the part of the site on which the new dwelling would be sited such that it would be seen by walkers using the route across the common.
44. Nevertheless, in landscape terms, the use of the site for a dwelling and smallholding type arrangement would be compatible with the immediate landscape which is characterised predominantly by enclosed land, other similar agricultural practices and a recently approved OPD development in the adjacent fields. In this regard, I do not disagree with Cadw's views regarding the lack of harm arising from the development in relation to matters within their remit.
45. At the Hearing, the Authority asserted that the design and appearance of the dwelling would not be in keeping with the local vernacular and would have an adverse impact on the landscape. It is a two storey dwelling which would be subterranean in part. Its contemporary design would incorporate a green roof with photovoltaic panels to the south facing plane and its external walls would be clad in Douglas Fir. The combination of scale, design and materials, and that it would be heavily screened by existing tree cover and topography in certain elevations, would result in the dwelling being largely inconspicuous from most public vantage points. I also note that the dwelling approved at Beeview Farm is of a contemporary design and that the surrounding area is a mix of dwelling types, styles and design. Consequently, and whilst I accept that the proposed dwelling would be partly visible from the common, the appearance of the dwelling would not, in itself, be objectionable or conflict with the overarching aims of LDP Policies 29 or 30 in this regard.

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<sup>9</sup> As illustrated in the Pembrokeshire Coast National Park 'Newport / Carningli Half Day + Walk' leaflet submitted as evidence by the Authority.

46. In this context, I do not find that the development would conflict with LDP Policy 1 which requires development to be compatible with the conservation or enhancement of the natural beauty, wildlife and cultural heritage of the NP and the public understanding and enjoyment of these qualities. I do not consider that the development would adversely affect the special qualities of the NP, but would meet with the Policy 8 objectives of protecting the historic pattern and diversity of the landscape. Neither do I find that the development would cause significant visual intrusion or that it would be insensitively sited in the landscape in line with LDP Policy 15.
47. The Authority also alleges conflict with LDP Policy 9 which deals with light pollution. The proposed scheme proposes no external lighting. At the Hearing, the Authority clarified that its concerns related to the light that would emit from inside the dwelling and its effect on the night sky. To this end, it has provided me with a copy of its '*Sky Quality Survey in the Pembrokeshire Coast National Park*', dated March 2015. However, taking all matters into account, I do not consider that the level of light from the dwelling would result in significant light pollution particularly as it is likely that the appellant will use some form of window dressing in the evenings (not least due to their insulating qualities) and that any light emitted would be screened to some extent by the existing vegetation.

#### *Traffic Impact*

48. Although the Authority cites conflict with LDP Policy 53 in its reason for refusal, it makes no substantive submissions regarding the specific concerns it has regarding the proposed access arrangements.
49. It seems to me that this concern was recorded in the Planning Committee Minutes and arises from the location of the dwelling at the top of a long access track and the anticipated difficulty of moving building materials. It was feared that such a track would require maintenance and, potentially, to be concreted over. There was also concern raised regarding the narrow width of the track from the junction with the road and its accessibility for emergency vehicles.
50. Interested parties who attended the Hearing also voiced their concern regarding the extension to the parking area to the west of the site, and the alterations to the ground levels that would be needed to accommodate such a change. The Authority confirmed that it has not taken into account this potential impact in coming to its decision.
51. At my visit, I saw that the site is accessed via a steep, single width road known as Castle Hill. There is an existing entrance into the site beyond which lies a parking area and gated access into the small irregularly-shaped fields. Both the position of the access through the fields and the size of the parking area would be altered as part of the development.
52. I observed that the part of the site over which the access would be laid is steeply sloping and I question whether it would remain accessible during periods of inclement weather. Whilst the appellant stated that an alternative material could be laid<sup>10</sup>, I am not persuaded that such a solution has been adequately tried and tested or is suitable for the circumstances at the appeal site.

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<sup>10</sup> This is also intended to be used at Beeview Farm and, whilst I had sight of it at my visit, it has not yet been laid so I cannot say with certainty the degree of success it will have.

53. In light of the above, I am concerned regarding the adequacy of the new access arrangements particularly as the highway it joins is a very steep and narrow single lane track with no footways or lighting along part of its length, thereby increasing the potential for vehicular and/or pedestrian conflict. Thus, I cannot conclude that an appropriate access can be achieved in line with Policy 53. Whilst my decision does not turn on this matter, and it may be possible to resolve this issue<sup>11</sup>, it currently adds to my concern regarding the unacceptability of the proposal.

### **Other Matters**

54. At the Hearing the Authority also introduced new verbal evidence in relation to the capacity of the PV energy system, whether the willow coppice would meet the energy needs of the dwelling and the adequacy of monitoring arrangements for the OPD. However, as the appeal has been dismissed for other reasons relating to fundamental planning policy principles, I have taken these matters no further.
55. My attention has been drawn to other appeal decisions in respect of OPD, the considerable experience of Mr Wimbush at Lammas and to the recently approved OPD at Beeview Farm. I have also been provided with a copy of the Management Plan in respect of the latter. Whilst some similarities and comparisons can be drawn, each OPD proposal involves matters which are finely balanced and must be assessed on their individual merits. They do not therefore alter the conclusions in respect of the proposal before me.
56. Interested parties raised concern regarding the impact of the development on flooding at lower ground beyond Castle Hill. As I understand it, residents have endured several incidences of flooding in recent years. Whilst I sympathise with the existing situation, there is no compelling evidence that the development would make matters worse and the Authority has not taken issue with the proposal in this regard. I see no reason to conclude otherwise.

### **Conclusion**

57. I have considered the duty to improve the economic, social, environmental and cultural well-being of Wales, in accordance with the sustainable development principle, under section 3 of the Well-Being of Future Generations (Wales) Act 2015 ("the WBFG Act"). I have taken into account the ways of working set out at section 5 of the WBFG Act and I consider that this decision is in accordance with the sustainable development principle through its contribution towards one or more of the Welsh Ministers well-being objectives set out as required by section 8 of the WBFG Act.
58. For the reasons I have given, and having regard to all matters raised, the appeal is dismissed.

*Melissa Hall*

Inspector

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<sup>11</sup> The Authority has suggested a condition which it considers would allow a preferable solution to be achieved in the event of planning permission being granted.

## **APPEARANCES**

### FOR THE APPELLANT:

Ms Susan Gillooley	Appellant
Mr James Shorten	Geo & Co
Mr Tao Wimbush	Lammas project

### FOR THE NATIONAL PARK AUTHORITY:

Mr Alan Archer	Member
Mr David Ellis	Member
Mr Bob Kilmister	Member
Ms Nicola Gandy	Team Leader, Development Management

### INTERESTED PARTIES:

Ms Anne Hughes	Resident
Ms Vivienne Ward	Resident
Mr Ian Ward	Resident
Ms Sarah Simms Williams	Resident
Ms Amie Strange	Resident
Mr Terry Strange	Resident
Ms Ann White	Appellant's sister
Mr Rob Lewis	Member & Chair of Planning Committee, PCNPA
Mr & Mrs Watkinson	Beehive Farm OPD