**Application Ref: NP/18/0411/FUL**

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<tr>
<th>Case Officer</th>
<th>Emma Langmaid</th>
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<tr>
<td>Applicant</td>
<td>Ms B Devonald</td>
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<td>Agent</td>
<td>Ms J Price</td>
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<td>Proposal</td>
<td>Rebuild of derelict cottages to form single holiday unit of accommodation.</td>
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<td>Site Location</td>
<td>Waun-y-Beddau, Nr Berea, St Davids, Pembrokeshire, SA62 6DB</td>
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<tr>
<td>Grid Ref</td>
<td>SM77782941</td>
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<td>Date Valid</td>
<td>07-Aug-2018</td>
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<td>Target Date</td>
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This application has been referred to the Development Management Committee as the officer’s recommendation differs to that of the St David’s City Council which supports the application.

**Consultee Response**

- **St Davids City Council**: Supporting
- **PCNPA Buildings Conservation Officer**: Advised that the ruin is too far gone to be a policy 14 building
- **Dyfed Archaeological Trust**: No objection
- **PCC - Transportation & Environment**: Conditional Consent
- **PCC - Drainage Engineers**: Conditional Consent
- **PCNPA Planning Ecologist**: No adverse comments

**Public Response**

A site notice was erected, and a neighbour notification letter was posted in accordance with the requirement of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012. A response was received from residents of a neighbouring property.

The following concerns were raised:

- We were not informed of the latest plans, we would like to know why?
- Extreme reservations about the height and proximity i.e. distance approximately 4 feet (1.22m) ridge height 15 feet 9 in (4.8m)
- We were not permitted to exceed 13 feet 6 in (4.11m) in height when we were first renovating our property and as a result were unable to have upstairs accommodation
- Plans are misleading in showing our property’s ridge height as being identical to the proposed development, when in fact ours is lower
- We were assured the rebuild of Waun-y-Beddau would be single storey as the original cottages have been.

The majority of the matters raised are addressed in the main body of this report, however, on the matter of whether the next-door property was notified,
Members are advised that a letter was sent to the immediate neighbour and a site notice was erected on 17 August 2018.

Policies considered

Please note that these policies can be viewed on the Policies page of 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 13 - Historic Landscapes Parks and Gardens
LDP Policy 15 - Conservation of the Pembrokeshire Coast National Park
LDP Policy 29 - Sustainable Design
LDP Policy 30 - Amenity
LDP Policy 32 - Surface Water Drainage
LDP Policy 35 - Visitor Economy
LDP Policy 37 - Self-Catering Development
LDP Policy 50 - Town and District Shopping Centres
LDP Policy 53 - Impacts on traffic
PPW9 Chapter 04 - Planning for Sustainability
PPW9 Chapter 05 - Conserving and Improving Natural Heritage and the Coast
PPW9 Chapter 08 - Transport
SPG05 - Sustainable Design
SPG06 - Landscape
SPG20 - Accessibility
TAN 05 - Nature Conservation and Planning
TAN 12 - Design

Constraints
LDP Mineral Safeguard
Historic Landscape
Safeguarding Zone
Hazardous Zones
Recreation Character Areas
Landscape Character Assessment

Officer’s Appraisal

Site and Context

The application site is situated along the northern side of the coastal highway between St Davids and Llanrhian and consists of the ruined stone walls of a former dwelling that fell out of use in the early 1940’s. The plot opens onto the highway, with open fields to the rear, side and across the road to the fore. A small number of dwellings and their associated outbuildings are located adjacent to the site to the south west. These dwellings vary in scale and form,
with some being single storey stone-built properties and others being two-storey rendered traditional dwellings.

**Planning History**

NP/17/0600/FUL – New dwelling. Refused 31 January 2018

NP/18/0155/FUL – Repair of redundant cottages to form new dwelling. Withdrawn 5 June 2018

**Description of Proposal**

Planning permission is sought to repair the ruins of two former stone-built cottages and convert it into a single holiday unit with accommodation on the ground floor consisting of a kitchen, lounge and bathroom, and accommodation in the roof space consisting of two bedrooms and a WC. A parking area as well as a bin store area is shown at the front of the dwelling, accessed via an existing opening off the highway.

The cottages are currently in ruins, and the proposal requires substantial rebuilding of the walls. It could not be described as a repair by any means of the definition. Rebuilding, particularly on the east and west elevations and partially on the north and south elevations would be required together with a completely new roof.

The accompanying Design and Access Statement states that it is the intention to retain the original door and window openings and rebuild the gable walls, restoring it to the cottage’s original appearance. The stone walls will be repaired and repointed as necessary, new timber sash windows and doors, and a new insulated roof providing bedrooms in the loft space. No additional landscaping or hardstanding is proposed.

**Key Issues**

The application raises the following planning matters:

- Policy and Principle of Development
- Siting, Design and Impact upon the Special Qualities of the National Park
- Amenity and Privacy
- Access and Parking
- Historic Landscape
- Biodiversity
- Drainage
- Trees

**Policy and Principle of Development**

The application site relates to two former stone cottages last occupied for human habitation in approximately 1940. The residential use has since been...
abandoned and the cottages are in a ruinous state of repair with no roof structure in place and only the front and rear walls remaining of some form. The site is located within the countryside, outside of any defined Centre. The proposal is thus for the development of a new building in the countryside to provide holiday accommodation.

Planning Policy Wales (Edition 9) (PPW) paragraph 4.7.8 is the relevant national policy which applies strict control on development in the countryside, away from existing settlements. There are criteria-based policies within the Local Development, which in certain circumstances permit some development in the countryside, and these are considered below.

Policy 7 (Countryside) of the Local Development Plan (LDP) criterion (d) states that development will only be permitted where it constitutes the conversion of appropriate buildings to a range of uses. Conversion must not result in unacceptable impacts upon the structure, form, character or setting of the building. To permit a conversion, Policy 7 requires the building to be ‘appropriate’; building remains do not constitute an appropriate building.

Policy 35 (Visitor Economy) criterion (c) permits self-catering accommodation on brownfield sites in the Local Development Plan’s Centres and in conversions in the countryside and Policy 37 (Self-Catering Development) permits proposals for holiday cottages only where a) the proposal is on a brownfield site in a Centre or is a conversion proposal in a countryside location (see Policy 7). Policy 37 also states that new build self-catering development on greenfield sites will not be permitted.

The application site could not be considered a brownfield site, as it does not meet the definition of Previously Developed Land in PPW, Figure 4.4. Specifically excluded from the definition are ‘land where the remains of any structure or activity have blended into the landscape over time so that they can reasonably be considered part of the natural surroundings. The recent work to remove trees and vegetation have exposed the site further, but which left alone would continue to screen the site and assimilate it into the landscape. Furthermore, the building is in a ruinous state, and the development proposed could not be considered a conversion.

Whilst the consideration of conversion to a residential use, in a previous application, raised the issue of accessibility, the level of accessibility provided by the Strumble Shuttle service which passes the site is considered sufficient to provide an alternative means of access other than the car for holiday use where travel requirements are less demanding than those for full time occupation.

However, the fact remains that the former cottages are in a ruinous state with no roof structure existing and the residential use having long since been abandoned. One of the gable walls has been completely removed whilst the other has collapsed leaving a small section of wall. The front and rear walls of the former cottages remain, although these are not complete. An area of concrete flooring is evident in part of the ruins. A Structural Survey carried
out by a qualified structural engineer has been submitted to support the
current application and although it provides a positive conclusion on the
suitability of retaining existing walls, based on the submitted information and
assessment of the site officers are of the opinion that that too little remains of
the existing buildings to be considered appropriate for conversion and as
such, the proposed development would be considered a new development in
the countryside without justification which does not meet the criteria of these
policies, and is therefore contrary to the LDP.

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

Policy 8 of the LDP refers to the Special Qualities of the National Park with
poor design being discouraged by criterion (b). Policy 15 of the LDP seeks
the conservation of the Pembrokeshire Coast National Park with criteria (a)
and (b) resisting development that would cause significant visual and/or, that
would be insensitively and unsympathetically sited within the landscape.
Criteria (d) and (e) resists development that would fail to harmonise with or
enhance the landform of landscape character of the National Park and/or fails
to incorporate important traditional features. Policy 29 of the LDP seeks to
encourage development that is well designed in terms of place and local
distinctiveness (criterion (a)). Policy 30 of the LDP seeks to avoid
development that is of an incompatible scale with its surroundings (criterion
(b)) or is visually intrusive (criterion (d)).

Whilst the current proposal has been amended from the two previous
schemes submitted (the first being refused and the second withdrawn) and
has reduced the overall scale of the rebuild and provided a more simplified
design, the PCNPA Buildings Conservation Officer has been consulted and
has confirmed that the building is too far gone to be considered a Policy 14
building (Protection of Buildings of Local Importance).

Amenity and Privacy

Policy 30 of the LDP states that development will not be permitted where it
has an unacceptable impact on amenity.

The proposal is of a moderate scale, being approx. 4.8m in height to the
ridge. This is lower than the previously refused scheme, which did not include
any reasons for refusal relating to impact on amenity. The concerns raised by
the neighbouring property have been considered but given the location of the
building and scale of the proposal, officers do not consider that the proposal
would result in any significant impact on the amenity and privacy of the
neighbouring property.

Access and Parking

The Highway Authority has stated that subject to appropriately worded
conditions being attached relating to the access being left unimpeded by
gates or any other barrier and the parking and turning area being completed

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Development Management Committee –17th October 2018
before the development is brought into use, the proposal is considered to comply with Policy 53 (Impacts of Traffic) of the LDP.

**Historic Landscape**

The application site is located within an area that is designated as Historic Landscape - St David’s Peninsula (LDP Policy 13 Historic Landscapes Parks and Gardens). Dyfed Archaeological Trust has no objection.

**Biodiversity**

Policy 11 (Protection of Biodiversity) of the LDP states that development that would disturb or otherwise harm protected species will only be permitted where the effects will be acceptably minimised or mitigated through careful design, work scheduling or other measures. PNCPA Ecologist has no objections.

**Drainage**

The scheme proposes the installation of a septic tank to dispose of a foul water and the provision of new soakaways for the disposal of surface water. PCC’s Drainage Engineers have been consulted and note that the application proposes surface water to be disposed of to a soakaway and should therefore not have a detrimental effect on watercourses with regard to additional flows. If soil conditions are not suitable for the use of soakaways/infiltration type SuDs, an alternative method of disposal will be required which should be agreed in writing with the local planning authority.

**Trees**

PCNPA Tree and Landscape Officer visited the site to assess trees and landscape features; it was identified that the site has undergone pre-development site clearance, leaving trees along the Northern and Eastern boundaries. These trees, although not the best specimens individually, do provide a valuable tree scene collectively. These trees provide a maturity to the site, as well as providing screening and softening of the site. They have good amenity value as they are located on the rural boundaries of the site and should be retained.

The trees have therefore been included in a new tree preservation order (TPO). TPO 142 Waunybeddau has been sent out to relevant parties.

The Tree and Landscape Officer recommends that there would be no objection in principle, however further information is required in regards trees and landscape constraints prior to a decision being made this includes a tree survey, tree protection (for remaining trees, hedges and hedgebanks) and details of any landscaping and new planting.
Conclusion

Following detailed consideration of the planning issues identified, including responses from statutory consultees and neighbours, it is concluded that the proposed development is considered to be contrary to both national and local planning policy given the ruinous state of the former building and the location of the development within the countryside, outside of any defined centre.

Recommendation

Refuse for the following reason:

1. The proposed development, by virtue of its location within the countryside does not represent a conversion but rather a new development in the countryside, due to the ruinous state of the former building, and is therefore contrary to policy 7 (Countryside) criterion (d), policy 14 (Protection of Buildings of Local Importance) paragraph 4.7.2, policy 35 (Visitor Economy), policy 37 (Self-Catering Development) of the adopted Pembrokeshire Coast National Park Authority adopted Local Development Plan (September 2010) and paragraph 4.7.8 of Planning Policy Wales (Edition 9 – November 2016).