

Application Ref: NP/19/0309/FUL

Case Officer Kate Attrill
Applicant J & L Reynolds & Lant
Agent Mr T Wimbush
Proposal A One Planet Development to include a cabin, shed, livestock barn, produce barn, compost toilet, greenhouse, farmgate stall and removal of hedgerow to create car parking area (part retrospective)
Site Location Lily Pond Farm, Whitewell Lane, Penally, Tenby, Pembrokeshire, SA70 7RY
Grid Ref SS09689945
Date Valid 30-Jul-2019 **Target Date** 06-Dec-2019

This application is being brought to Committee as it is classed as a Major application.

Consultee Response

Penally Community Council: Objecting
PCNPA Tree and Landscape Officer: Conditional Consent
PCNPA Planning Ecologist: Conditional Consent
PCC - Transportation & Environment: Conditional Consent
PCC - Public Protection: No adverse comments
PCC - Drainage Engineers: Conditional Consent - SAB approval will be required
Agricultural Advisor Carme CC: Concern

Public Response

The Town and Country Planning (Development Management Procedure) (Wales) Order 2012 requires that proposed developments are advertised by way of either neighbour letters or a site notice. In this case, due to the nature of the site, two site notices were posted at the southern and northern ends of the lane on the 14th June 2019 when the application was first received.

No objections have been received in regard to the application apart from that from the Community Council.

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 09 - Light Pollution

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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 28 - Composting
LDP Policy 29 - Sustainable Design
LDP Policy 30 - Amenity
LDP Policy 32 - Surface Water Drainage
LDP Policy 47 - Low Impact Development
LDP Policy 52 - Sustainable Transport
LDP Policy 53 - Impacts on traffic
PPW10
SPG02 - Low Impact Development making a positive contribution
SPG05 - Sustainable Design
SPG06 - Landscape
SPG19 - Siting and Design of New Farm Buildings
TAN 06 - Planning for Sustainable Rural Communities
TAN 12 - Design

Constraints

LDP Mineral Safeguard
Ancient Monument - within 500m
Potential for surface water flooding
Recreation Character Areas
Landscape Character Assessment
Seascape Character Assessment
Affordable Housing Submarkets
Seascape Character Areas

Officer's Appraisal

Site and Context

The application site is approximately 28 acres and lies to the west of Penally and immediately adjacent to Whitewell Lane which runs between the A4139 and the Ridgeway. The land slopes down to the south east from the ridgeway. The original vehicular access was located to the south of the existing reservoir.

Relevant Planning History

The applicants first submitted a permitted development Prior Determination application (NP/18/0500 refers) for five barns, but the basic premise of Prior Determination is that an application is submitted *prior* to development, and in this case, development had already commenced and so it was therefore not possible to proceed via that route, so a full planning application was requested.

The applicants then submitted a full planning application (NP/18/0717/FUL refers) for the barns proposed, but introduced a residential element part way through the application and then submitted a One Planet Development (OPD) Management Plan

later again in the processing of that application. This application was refused on the basis of insufficient information on the 29th March 2019.

Description of Proposal

Planning permission is sought for a single temporary dwelling in the form of a cabin which fits within the definition of a caravan and a number of outbuildings under the principles of One Planet Development (OPD). The application is submitted partly in retrospect, with a shed/office/store already having been built and a barn being partly constructed, and the new access and parking area already in place.

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 an OPD the applicant expects to derive 65% of their food directly from the land.

The development proposes:

One cabin (caravan) - 4m by 10 metres
One shed (including office and store) - 6 metres by 6 metres
One livestock barn – 6 metres by 12 metres
One produce barn – 6 metres by 12 metres
One compost toilet 3 metres by 2.4metres
One farmgate stall – 4 metres by 2 metres
One greenhouse – 4 metres by 8 metres
A new access and parking area measuring 15 metres by 12 metres

This application seeks to establish that the applicants will be able to meet their needs through their farming the land with heavy horses, primarily producing wheat, oats, barley, potatoes, carrots, beans, onions and leeks.

Two working horses, (and potentially two foals), a milking cow and chickens will also be kept.

Proposals also include:

- Developing a sheltered garden for salads crops and herbs
 - Creating a coppice for fuel and building materials
 - Planting fruit and nut trees and soft fruit bushes
 - Wild flower meadows for bees
 - Planting willow for making baskets and fuel
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- A nature trail, open Sundays from April to October is also detailed on plans
 - Four courses (12 people pre course) per year on scything and hay making, Working horses 1, 2 & 3 on a donation led basis (there is no elaboration as to whether these are residential or non-residential courses)

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
- One Planet Development

Policy:

National policy

PPW (edition 10, December 2018) defines One Planet Development (OPD) as that which through its low impact either enhances or does not significantly diminish environmental quality. OPD may take a number of forms and can either be single homes, co-operative communities or larger settlements. They may be located within or adjacent to existing settlements, or be situated in the open countryside.

PPW requires that 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 five years from the commencement of work.

The essential characteristics of OPD from PPW 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.

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 (which has a similar definition to OPD in PPW) 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 OPD is supported by national and local planning policy, which (subject to appropriate details) allow for such developments in the open countryside

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

Policy 8 of the Pembrokeshire Coast National Park Local Development Plan (LDP) is a strategy policy which refers to the special qualities of the National Park and lists priorities to ensure that these qualities will be protected and enhanced.

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 intrusion 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 and landscape character of the National Park and/or fails to incorporate important traditional features.

Policy 29 of the LDP requires all development proposals to be well designed in terms of place and local distinctiveness (criterion (a)).

In terms of the proposal, the most significant landscape impact to date has been the removal of a large section of hedgerow to create a parking area, and although new mounds have been created around this area, they do not mitigate for the loss of the historic boundary which has opened views into the site not previously possible. Although landscaping details have been requested, they have not yet been received in order to be able to judge whether they are acceptable within the National Park. A tree and landscaping report requested by the Authority's Tree and Landscape Officer has been deemed to be not required by the applicant's agent.

Part of the OPD requirements are that buildings be sited within the landscape to be as unobtrusive as possible. The siting of the buildings in this application appears to be more related to the proposed use than their impact on the landscape, and there is no explanation of the rationale of the locations chosen within the application documents. Had the new access/parking area not been created, there would be limited views into the site, but the creation of this open area has created views into the site not previously possible, and the buildings will appear out of character with the surroundings in terms of both siting and design.

The log cabins proposed are not in character with built development in the National Park, but do also have to meet the criteria of being zero-carbon and be removable within the OPD guidelines, neither of which are considered to have been met within this application

The proposed Management Plan.

The Welsh Government OPD Practice Guidance document states that a OPD requires persons to live more sustainably (and differently) than the norm in the 21st 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

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.

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.

An ecological appraisal of the aerial photographs and maps for the area show that it is adjacent to the open countryside and has scrub habitat, woodland, hedgerows and streams, all offering bat foraging opportunities. Fields are generally small in size and managed un-intensively, and thus the wildlife connectivity value of the area is high. The site is approximately 800m from the coast and as such, has moderate to high levels of exposure.

The Authority's Ecologist was concerned that there was insufficient information submitted initially, and further information was requested relating to a bat survey, hedgerow removal and replacement, the siting of the compost toilet by a watercourse, the flow rates and abstraction from the watercourse, and lack of construction and environmental management plan relating to the construction of a track.

Following our Ecologists comments, further ecological information was submitted on the 30th September 2019. The information provided states that there will be no negative impacts on any protected species as a result of the proposals, but the

information is still being assessed by our Ecologist as to whether it demonstrates capacity to improve biodiversity in line with OPD requirements.

It is noted that two of the contributory criteria regarding populations of farmland birds and pollinating insects being improved through the land management criteria have not been surveyed, so no baseline assessment is possible on which to judge any potential improvement. In this respect the application fails to meet the criteria of OPD development.

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 household development with five buildings being applied for – a dwelling in the form of a cabin, which is to be located to the lower part of the site, two barns, one for produce and one for livestock, a greenhouse, a shed (already built) to house an office and storage area (although previously used for residential purposes), a compost toilet, and a farm stall.

It is noted that the current shed has thus far been used for part residential purposes in addition to the touring caravan sited on the parking area.

Agricultural Appraisal

PCNPA consult with an independent consultant in order to assess such proposals as these, and his comments are as follows:

As you are aware initial works of development have been undertaken prior to this application. Unfortunately un-authorized works were undertaken to remove a section of natural hedge bank and create a hard standing for vehicle parking off Whitewell Lane.

Without this un-authorized access the development would have been better screened from the public highway. The original access off Whitewell Lane at the bottom of the site was not inspected in detail but from the road edge this appeared overgrown and difficult for anything other than small agricultural vehicles to access. Historic access to the site was most likely across the hill from adjoining fields.

The holding is steep with a significant change in levels from the uppermost to the lowest point. This does limit the potential for growing crops and tilling the steeper land and the site layout / land use plan reflects this. Most of the upper parts of the site are to be used for grazing, tree planting or hay crop. The intensive cultivation of the market garden/arable cropping area restricted to the bottom of the site on an area of 2.5 acres against a total holding area of 25 acres.

There is a strong emphasis on the use of animals as key to the cultivation process. Rare breed horses will be used to plough the land for cultivation. Despite this there are no stables planned – they will be housed in an open barn with the house cow when necessary. This is not ideal. Approximately 8.3 acres will be allocated for horse grazing, although this is to be rotated with grazing for the house cow. As useful as

they are in labour terms, horses are not an ideal grazing tool as they are selective grazers and generally do not promote and enhance biodiversity of the land they are kept on. The proposal notes that 2 additional foals will also be kept. When conditions are wet poaching of the land by horses can occur and supplementary winter feed will be required. Although there is scope to produce this within the site it is further land that cannot be utilised for other projects. The traditional use of sheep grazing was undoubtedly better suited to this land.

The site shows signs of being quite wet during winter with soft boggy ground to the southern end was (sic) apparent. There are a number of springs and water courses running down the site and evidence of rushy ground extending up the hillside. Unless carefully managed and grazed this will limit the cultivatable area. Whilst the application details defective underground pipework from the springs that is to be repaired to improve the water supply we understand that this has yet to be tested and its suitability as a drinking water supply is unknown. Also the reliability of the water courses both in terms of volume and continuous flow was uncertain. The manmade reservoir at the bottom of the site suggests that a shortage of water/seasonal fluctuations have been a problem in the past.

Other aspects of the proposal where the suitability and sustainability are in question are as follows:

Open air storage – there is a considerable amount of equipment and waste metal / materials stored in the long grass at the site entrance. It remains to be seen if this is moved indoors once buildings are erected or taken offsite.

Year round ploughing – this is mentioned but is not considered realistic given the prevailing climate. Weather and soil conditions may preclude this and limit actual productivity.

Produce & Farm Gate Sales – there is a heavy dependency on the market gardening and food production element of the project. At this scale and in view of the market for the product this is an area of risk. Some of the yields quoted are in excess of those of large scale commercial growers and therefore may be hard to achieve year on year. How many tourists will walk up the lane and buy produce whilst staying at nearby static parks is questionable.

Arable crops – The proposals to grow wheat, oats and barley for animal feeds appear optimistic when compared to the yields stated in John Nix pocket book.

House cow – no costs for vets bills, Tb testing and other complications of keeping a bovine are provided.

Labour – despite the labour intensive nature of the proposal the hours stated are below the level needed for two full time staff of 4400 hrs per annum. The document states that additional labour may be required at peak harvest times and that visitors will be accommodated at those times. This ability of the site to produce enough food for the number of occupants needed to run it is critical to its suitability for OPD.

Clay tiles – Whilst these may not have the ideal carbon footprint depending on their origin for a shed that does not require Building Regulations it may be sufficient that they are of ‘low environmental impact’. None of the buildings are identified by the applicant as needing building regulations. This should be checked and verified.

Other income – Whilst a variety of income generating activities are proposed there is a lack of detail in respect of some of these and the likely income. For example, beekeeping or ploughing courses.

Land management – Planting of some areas of the site with fruit trees and conifers is proposed, however this changes the visual amenity of the land in a historic landscape which is visible over a wide area. Planting new hedges to subdivide fields is mentioned as mitigation for the removed hedge bank. There are no specific details of this and it is not clear if there is a historic landscape precedent to support this.

Whilst the EFA (Ecological Footprint Analysis) appears to show that a figure of 1.86 perhaps is achievable after 5 years we do not have to the expertise to verify this. Although the use of a car is stated as being below the national average the continued use of an old relatively polluting vehicle is confirmed with no clearly stated alternatives or quantified significant reduction in use/impacts.

In summary – It is considered that the proposal occupies a sensitive and exposed location within an area popular with tourists. The land in question isn’t well suited to modern forms of mechanised farming due to the steep slope and poor access. The relatively small field sizes are also less economic to farm. The fact that the site has become less favourable for large scale farming does not automatically make it viable for a smaller more intensive proposal such as this. Whilst the aims of sustainability and the target income of £10,000 by year five are not considered wholly unrealistic we have concerns as outlined above and consider that considerable risks exist.’

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.

As stated above, the assessment by our independent agricultural advisor is that the proposed targets are overly-ambitious and unlikely to be met. This considerable doubt places in questions how realistic the business and improvement plan are.

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.

From the submitted information, the applicants consider that they have demonstrated that they would be able to meet their 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 in light of the agricultural assessor's comments on the labour intensive nature of the proposals being below that needed to produce what is predicted.

Land Management

OPD 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, i.e. 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 applicants have stated that they will enhance the landscape character: 'by the traditional management of field, woodland, orchard and hedgerow[s]' but the ambition is vague with no explanation as to how this will enhance the landscape. The planting of new hedgerows is not proposed to be undertaken until year 3.

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 proposed a solar array next to the cabin of 4x 250W panels. The system will be connected to a battery reserve of 440Ahrs.

For the dwelling, heating is primarily sourced by passive solar primarily from the south which is to be supplemented by a wood burner cooking range, fed by biomass sourced from short rotation coppice willow which will be grown on site and thinning of the woodland area.

The shed is also proposed to have a 500W array on the roof which will be connected to a battery reserve of 220Ahrs.

In respect of water usage, the applicant indicates that the predicted domestic water use will be no more than 500 litres per week, compared to a household average of 1050 litres per week. Water will be mainly sourced from rainwater harvesting and from the two springs on site (the upper for livestock and the lower for domestic use/milking parlour and livestock).

Although the reservoir was installed in the 1960's to supply water to the potato crops, the applicants have stated that they will not be using this for crop supply, but will instead be using this as a wildlife haven.

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 applicants have indicated that all domestic food waste will be composted on site, that grey water from the cabin and the shed will be filtered before being returned to ground through two separate reed-bed filtration systems. No details of the size or method of construction of these reed beds has been submitted.

The 'humanure' from the compost toilet is stated as being used for the nuttury trees as mulch, and the urine is to be watered into fields compost heaps and gardens.

It is considered that the Management Plan remains questionable on issues of how waste will be disposed of adequately in regard to its use on crops destined for human consumption. Further advice from this has been sought from Natural Resources Wales.

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 dwelling house constructed of timber with clay tiles, as are the shed and barns.

In the supporting information details of the use of concrete is also mentioned, within the Construction Method Statement but not within the zero-carbon buildings section, and the sourcing of the tiles is not elaborated on.

The timber is detailed as being sourced from Canaston Woods, but the 'lightweight fibre-board roofing sheets for the cabin and tiles for the shed, and barns are not detailed. Concrete blocks have also been used in the construction of the chimney for the shed, but these are not referred to in this section.

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 materials for the buildings. 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.

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 aims the proposal to be an open project welcoming visitors to see horse-powered farming in action in the 21st century and also proposes a nature trail to encourage visitors.

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, but the impact of visitors coming to buy produce is not mentioned in the Management Plan. Although the site is located close to several large caravan sites, the likelihood of people walking to the site to buy heavy produce is questionable.

The practice guide to OPD states at para 3.123: *'on site enterprises will generate transport movements ranging from local deliveries of produce such as a box scheme through to receipt of goods and supplies from off-site and delivering goods to more distant locations such as processed food or craft items. All of these need to be accounted for, as some could significantly increase the overall transport impact of the site. Enterprises which are well embedded in the local economy will generally have lower transport impacts.'*

The guidance goes to state at para 3.124 : *The transport associated with visitors has three important components: the number of trips, the modes of transport concerned, and the distance travelled to the site. Sites might receive regular visits from local schools. They might organise courses which attract people from a wide range of origins. Visitors might drop in on an on-going basis, or only for pre-arranged open days. All visitors need to be accounted for, as some could significantly increase the overall transport impact of the site and will be a consideration in the assessment of overall Ecological Footprint.'*

The applicants have stated that the sale of produce from the farm gate stall is crucial to their meeting their income, but have not assessed the impact of this in their

transport assessment plan. Sales from the farm gate are predicted to be £1940 per year, but there is no predicted break down in terms of visitors walking/cycling or driving to buy potatoes. Given the recent use of the farm stall, some assessment of this would have been expected/possible. This would also be expected for the visitors using the nature trail, but would have to be monitored through the annual monitoring report.

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 for trips.

Ecological Footprint Analysis

The applicant advises that their current ecological footprint is 4.25 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 1.86 global hectares in 5 years, which would meet the goal of 1.88 set by the Welsh Government.

Some aspects of the calculations shown appear to be unrealistic, with housing build costs shown at £0 initially, and £333 per year on year 5. No figures for the barns and other buildings already part constructed have been provided.

Although 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 applicants EFA calculation shows that they currently drive 7981 km per year, which will not reduce over the 5 year period. This may be a consequence of their already living on the site, so no comparison to previous living arrangements is possible.

One Planet Developments should aim to significantly reduce the environmental impacts of transport, both by reducing the need to travel and favouring low carbon modes of transport.

Officers consider that several element of the Ecological Footprint Analysis are questionable or of sufficient reduction to be in accord with OPD guidance.

Phasing, Monitoring and Exit Strategy

Phasing

The Management Plan proposes a 5 year strategy for development of the site. According to the phasing plan provided, the applicants would appear to be in year 2 currently, with hard standings already in place, compost toilet built, barns partly built, and fields cultivated.

Although referred to within year 3 of the Phasing, the farm stall has been implemented and selling produce from the site since September 2019.

Monitoring

The applicant has identified the essential criteria required for monitoring (which is set out in the TAN 6 OPD 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 could be craned off site, the shed dismantled, compost toilet dismantled, and the greenhouse and stall would be removed from site.

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.

The two barns are proposed to be left on site 'so that there is infrastructure on the holding to support agricultural activities'.

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.

The suggestion of the barns remaining on site appears contrary to the principles of OPD.

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 OPD in the open countryside.

Adequate arboricultural and land scape plans have not been provided. 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; an adequate zero carbon proposal, the reduction in transport costs and vehicle trips expected for a low impact lifestyle and a clear timeline or methodology 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

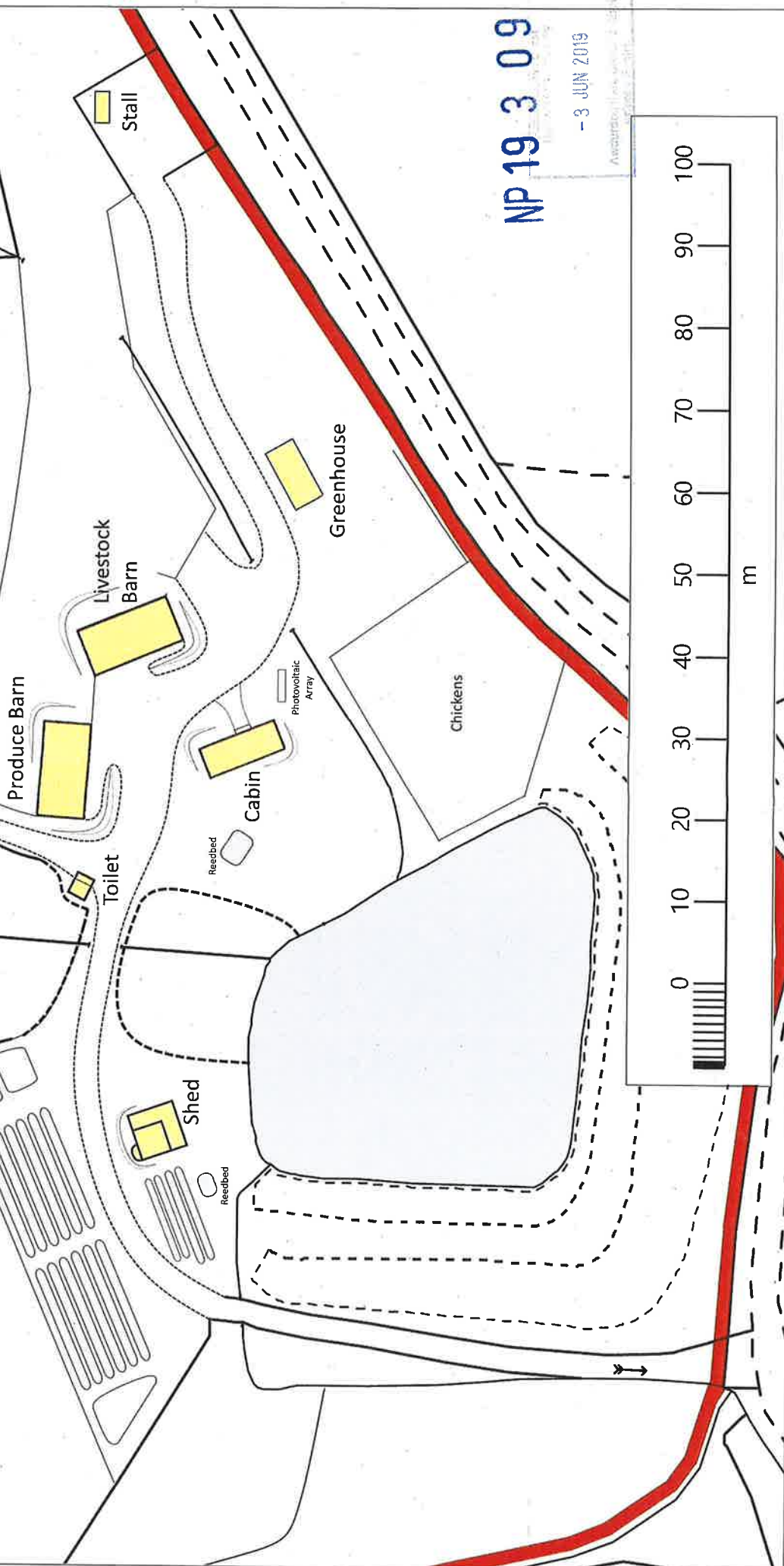
would not be in accordance with requirements of national and local planning policy, and the application cannot be recommended for support.

Recommendation

That the application be refused for the following reasons:

1. The application does not demonstrate an adequate biodiversity baseline for monitoring, failed to submit an adequate arboricultural and landscaping plans, has failed to demonstrate an adequate zero carbon proposal, an incomplete transport assessment, and fails to provide an effective exit strategy. As such, the development cannot be considered to comply with the principles of One Planet Development. As such, the proposal is contrary to the requirements set out in Planning Policy Wales (Edition 10, December 2018) 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 10, December 2018), Technical Advice Note 6 – Planning for Sustainable Rural Communities, and the Pembrokeshire Coast National Park Local Development Plan Policy 7 (Countryside).

Lily Pond Farm
Drawing 2.0
Block Plan
1:500

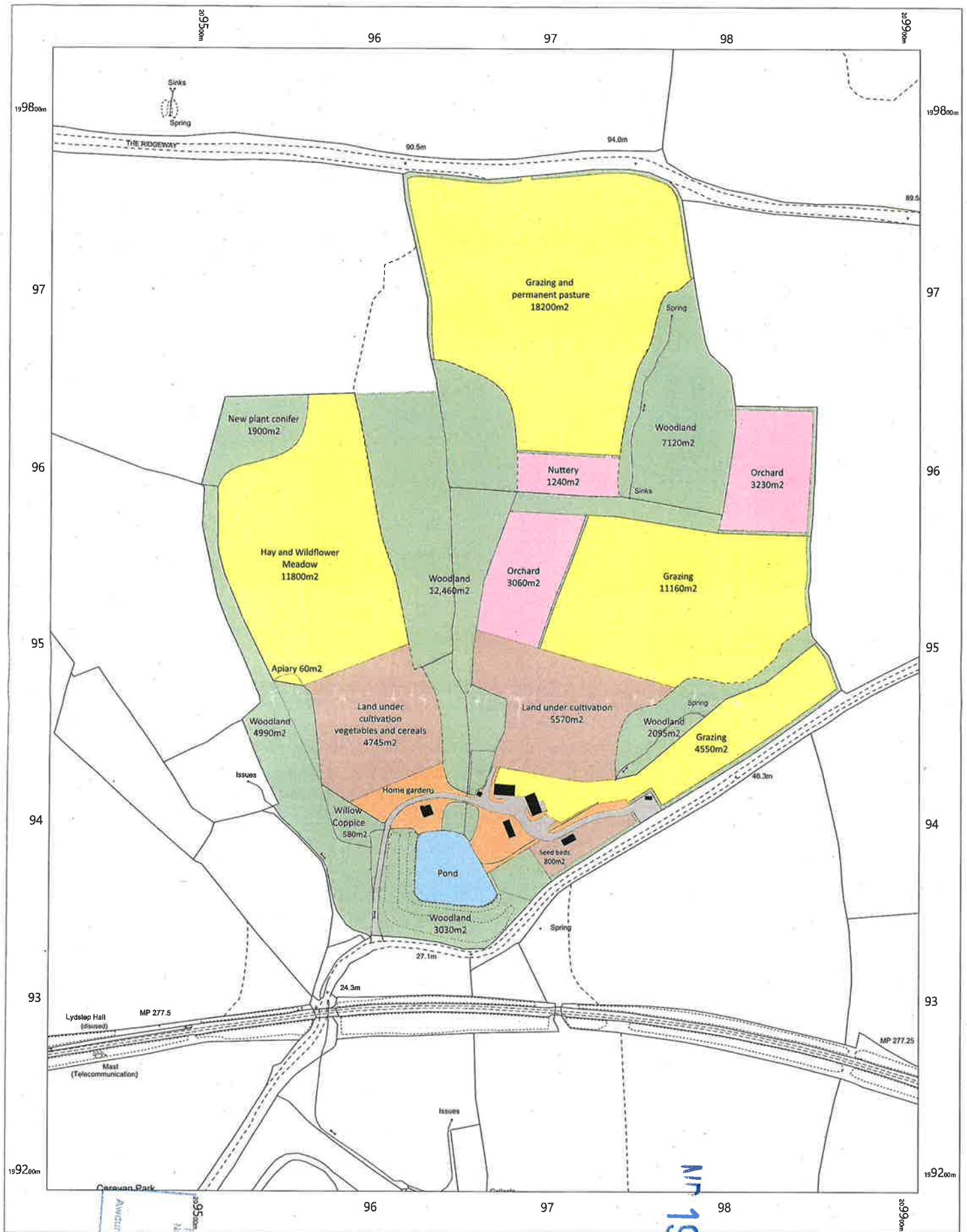


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Approved by: [Signature]

Lily Pond Farm



Lily Pond Farm
Drawing 1.3
Land Use Plan
1:2000

Woodland (32175m ²)	Home Garden (2170m ²)
Grazing/Hay (45710m ²)	Pond (1488m ²)
Fruit and Nut (7530m ²)	Hardstanding / Tracks / Buildings (1495m ²)
Field Cultivation (11115m ²)	Hedgerow (1510m ²)

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Lily Pond Farm

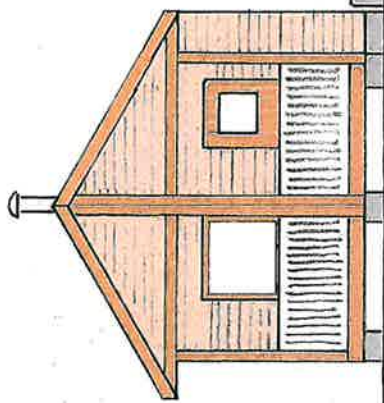
Drawing 3.2

Cabin Elevations

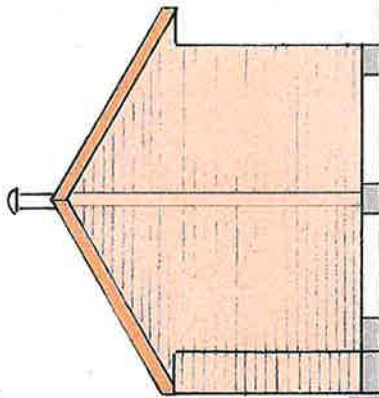
1:100

NP 19 3 09

Permit Application
- 3 JUN 2019 -
Auckland Council

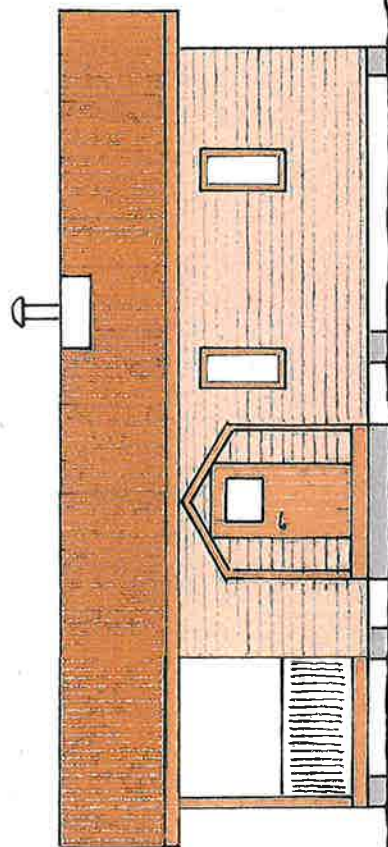


South



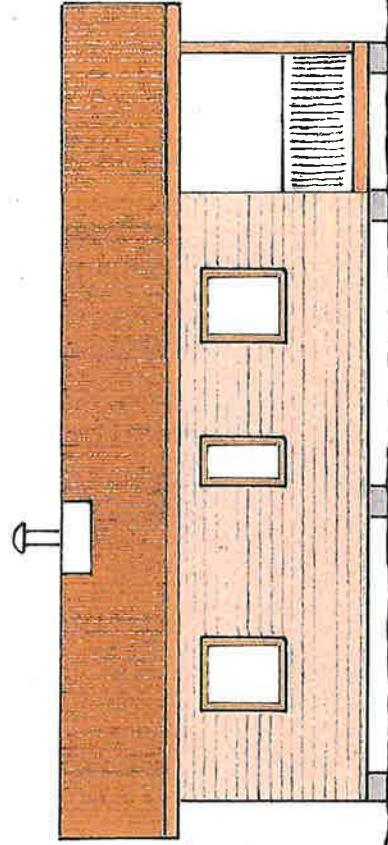
North

34.0m asl



East

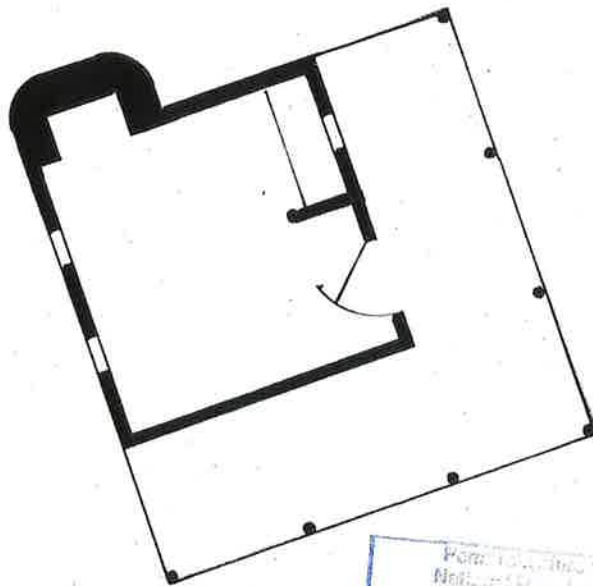
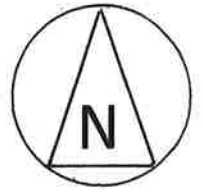
34.0m asl



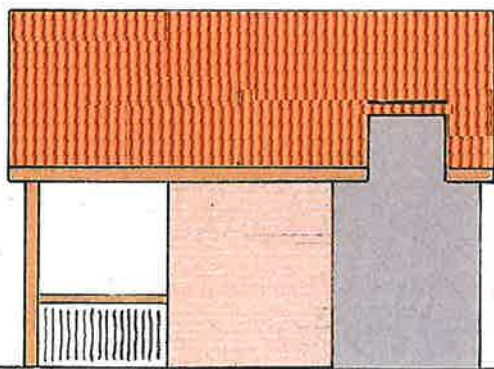
West



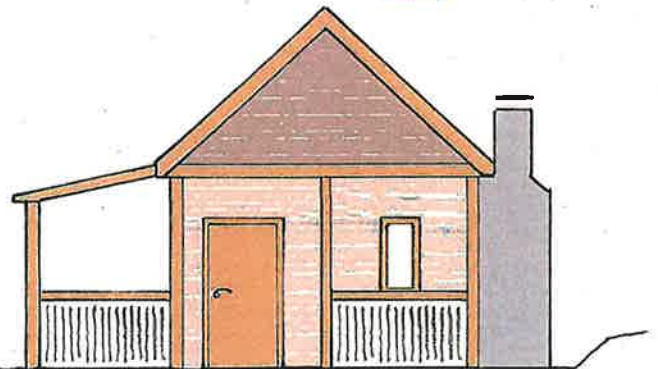
Lily Pond Farm
Drawing 4.1
Shed Plan
and Elevations
1:100



Pennine Planning East
Widened
- 3 JUN 2019
Awdurdod Penrhyn Gogleddol
Arfordir Centre



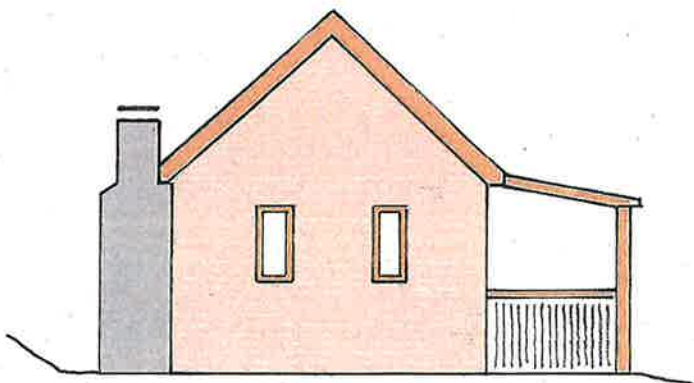
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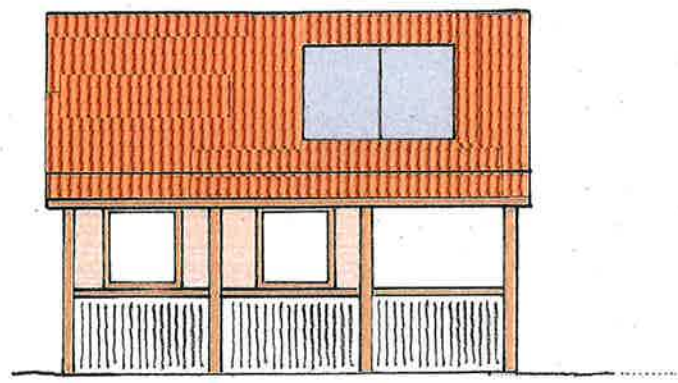
East

32.5m asl

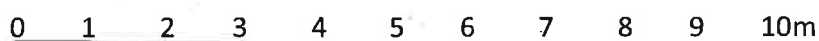
NP 19 3 09



West



East



Lily Pond Farm

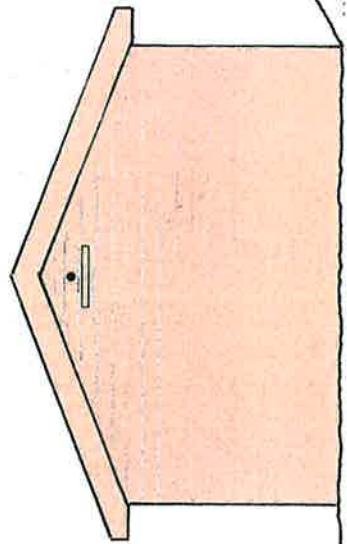
Drawing 5.2

Produce Barn Elevations

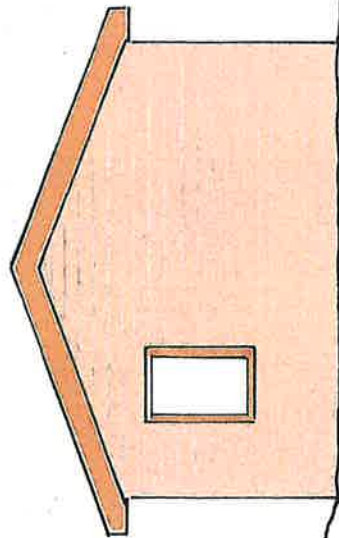
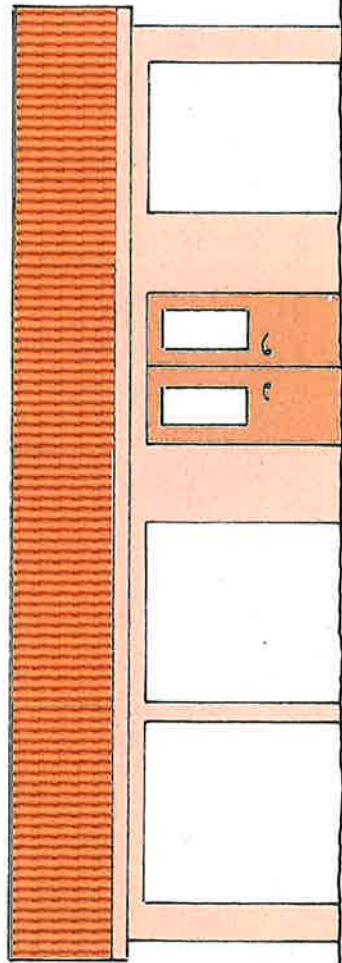
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NP 19 3 09

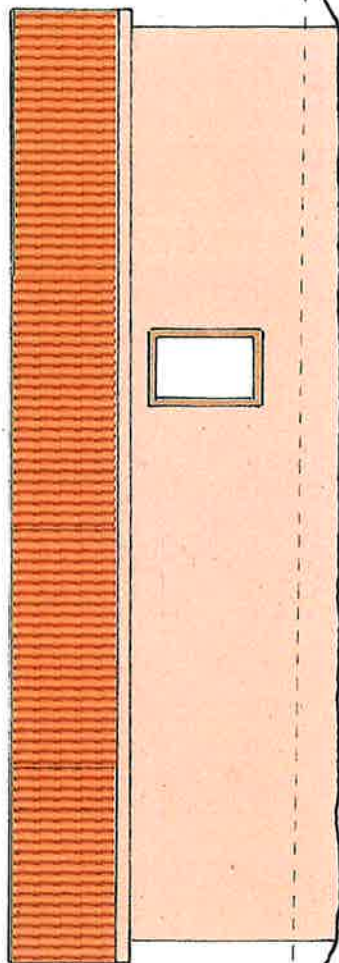
Warrumbidgee Coast
Council Park Authority
- 3 JUN 2019
Local Part Council



East



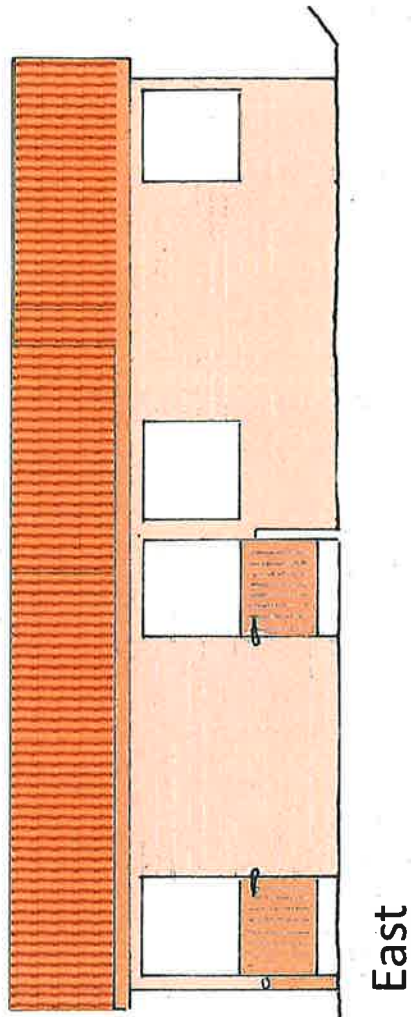
West



Lily Pond Farm Drawing 5.3
 Livestock Barn Elevations 1:100

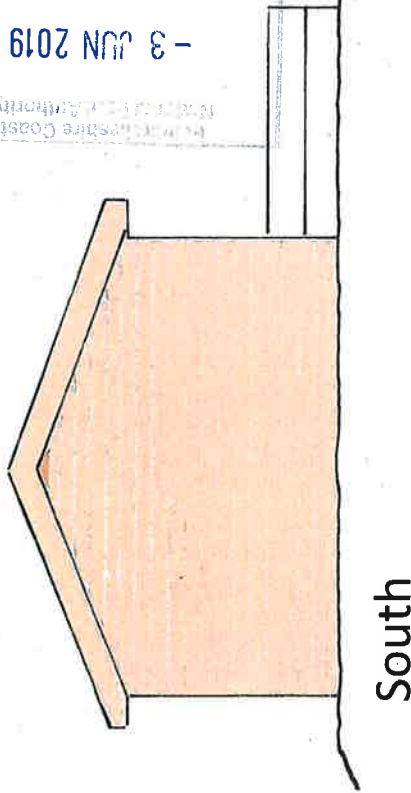
Nr 19 3 09

PLANNING AUTHORITY
 - 3 JUN 2019
 Avonmouth City Council

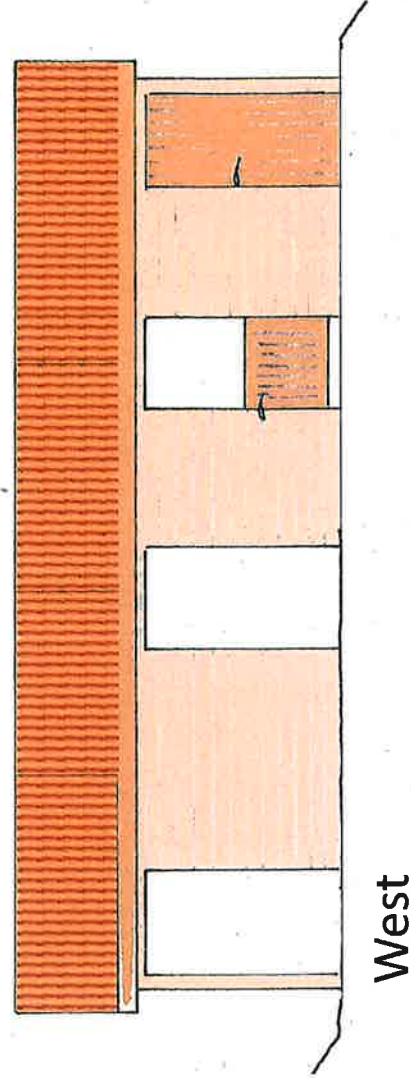


East

36.2m asl

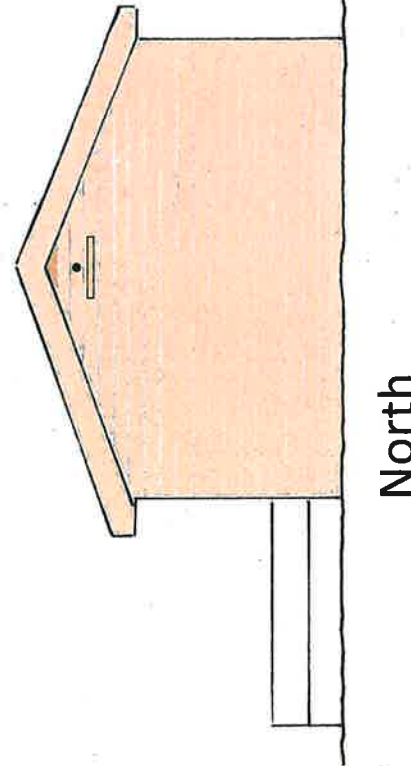


South



West

36.2m asl



North

