

Application Ref: NP/18/0766/FUL

Case Officer Caroline Bowen
Applicant Mr Barton
Agent Mr I Bartlett, Ian Bartlett Building Design & Cons.
Proposal Extension & conversion of existing outbuilding to create a live/work unit to include a ground floor Gallery/workshop (B1 use) with a first floor extension to create subsidiary residential accommodation in association with the B1 use
Site Location Outbuilding Opposite Ty Mawr, Solva, Pembrokeshire, SA62 6XA
Grid Ref SM80692450
Date Valid 21-Dec-2018 **Target Date** 19-Jun-2019

Consultee Response

Solva Community Council: Supporting

PCNPA Buildings Conservation Officer: Supporting

PCC - Transportation & Environment: No objection

Natural Resources Wales: See attached

NATS: No objection

Dwr Cymru Welsh Water: Conditional Consent - and advisory note to be included with any permission granted.

PCNPA Planning Ecologist: Conditional Consent

Public Response

The application was appropriately advertised, and 3 responses have been received. One response was of support on the grounds of adding to the economic offer of Solva; and 2 responses were of objection on the grounds of loss of character arising from the addition of a first floor, impact on amenity and insufficient parking provision.

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 06 - Rural Centres

LDP Policy 08 - Special Qualities

LDP Policy 11 - Protection of Biodiversity

LDP Policy 15 - Conservation of the Pembrokeshire Coast National Park

LDP Policy 30 - Amenity

LDP Policy 34 - Flooding and Coastal Inundation
LDP Policy 42 - Employment Sites and Live/Work Units
LDP Policy 53 - Impacts on traffic
PPW10
TAN 15 - Development and Flood Risk

Constraints

LDP Mineral Safeguard
Biodiversity Issue
Safeguarding Zone
Hazardous Zones
Potential for surface water flooding
Recreation Character Areas
Article_4_Directions
Affordable Housing Submarkets
Seascape Character Areas

Officer's Appraisal

Summary

At the Development Management Committee meeting, held on the 1st May 2019, Members were minded to approve this planning application contrary to officer recommendation.

In accordance with National Park Authority policy a “cooling off” period was invoked, to allow further consideration of the issues raised.

The main land use planning considerations for this proposal are referred to in the May 2019 officer's report and remain valid. They are not repeated here.

Summary of previous report

The May 2019 recommendation was to refuse the application on the grounds that the site lies within Flood Zone C2, and proposes highly vulnerable residential development which is wholly contrary to national policy contained within Planning Policy Wales Edition 10, Welsh Government Guidance Technical Advice Note 15: Development and Flood Risk, and Policy 34 of the Pembrokeshire Coast National Park Local Development Plan (adopted 2010).

Whilst use of the existing structure for commercial purposes only may be acceptable, as it would contribute to key employment objectives and is a less vulnerable use, the introduction of a residential (highly vulnerable) use is clearly contrary to National and local Planning policy.

Members indicated at the May 2019 committee meeting that they were minded to approve the application because the development would bring regeneration and economic activity to a building in the heart of the village. Officers have considered this further, and would advise as follows:

The proposal is submitted as a discrete development and not one supporting an existing business in the locality. The ground floor business could be said to contribute marginally to the viability and vitality of Solva as a National Park Centre., but there is no basis for introducing a highly vulnerable development in this C2 flood risk zone.

National policy is set out in Planning Policy Wales (PPW) - currently Edition 10 released in December 2018. PPW is supported by a suite of Technical Advice Notes (TAN's), of which TAN 15 expands national policy on development and flood risk.

The Welsh Government's key planning principle set out in PPW10 is the duty placed on public bodies to carry out sustainable development – as set out in the Well-being of Future Generations Act.

In terms of development and flood risk, the national policy position is clear – Paragraph 6.6.22 – *“Climate change is likely to increase the risk of flooding.....Planning authorities should adopt a precautionary approach of positive avoidance of development in areas of flooding from the sea or from rivers.”*

Paragraph 6.6.23 – *“Government resources for flood and coastal defences are directed at protecting existing developments and are not available to provide defences in anticipation of future development.”*

Paragraph 6.6.25 – *“Development should reduce and must not increase flood risk arising from river and/or coastal flooding on and off the development site itself.”*

Technical Advice Note 15 contains additional policy advice on development and flood risk - (emphasis is added to highlight the pertinent elements of the policy)

*Paragraph 6.2 **New development should be directed away from zone C and towards suitable land in zone A, otherwise to zone B, where river or coastal flooding will be less of an issue. In zone C the tests outlined in sections 6 and 7 will be applied, recognising, however, that **highly vulnerable development and emergency services in zone C2 should not be permitted.** All other new development should only be permitted within zones C1 and C2 if determined by the planning authority to be justified in that location. Development, including transport infrastructure, will only be justified if it can be demonstrated that:-***

i. Its location in zone C is necessary to assist, or be part of, a local authority regeneration initiative or a local authority strategy required to sustain an existing settlement ; or,

ii Its location in zone C is necessary to contribute to key employment objectives supported by the local authority, and other key partners, to sustain an existing settlement or region; and,

iii It concurs with the aims of PPW and meets the definition of previously developed land; and,

iv The potential consequences of a flooding event for the particular type of development have been considered, and in terms of the criteria contained in sections 5 and 7 and appendix 1 found to be acceptable’.

This policy approach applies equally to all applications - whether for a modest householder extension, or a major housing extension to a city. The fact a proposal may appear to be small-scale and therefore not harmful in itself is immaterial – a succession of small scale development in an area known for flooding would still have a harmful cumulative impact.

There is much evidence to demonstrate the current flood risk at Solva. Natural Resources Wales are required by the Flood Risk Regulations 2009 to produce flood risk management plans, that demonstrate the gravity and scale of the issue in Lower Solva - *“Fluvial flood risk is also high on some of the smaller coastal streams. By their nature these streams often react quickly to rainfall, and the flood hazard can be high. The river Solva is one such smaller coastal stream. It poses a risk to a limited number of properties in the idyllic hamlet of Middle Mill and also to the larger coastal community of Solva itself. Solva is a picturesque coastal village characterised by a coastal inlet providing natural shelter for boats into which the river Solva flows. Its location leaves it susceptible to both tidal and fluvial flooding. A flood storage reservoir in the catchment has reduced the likelihood of flooding in both communities, but has not reduced the risk completely.”*

The Plan refers to recent flood events including:

November 1986, flooding was reported at 14 properties in Solva. This was the highest recorded river level prior to construction of Pont-y-Cerbyd flood storage reservoir in 1989.

January 2013, the highest river level on record for the river Solva. Although the flood storage reservoir at Pont y Cerbyd reduced the impact of flooding, 3 properties were flooded in the community of Middle Mill and 18-20 properties in the village of Solva.

The Plan further advises that ... *Future flood risk will be influenced by climate change and changes in land use such as urban development and rural land management. The predicted changes frequency and intensity of rainfall is likely to increase flood risk, particularly in the smaller, faster responding catchment such as that of the River Solva.... Climate change is also predicted to cause a rise in sea levels; this is likely to increase the risk in coastal communities and those communities where rivers are tidally influenced.”*

The West of Wales Shoreline Management Plan provides an insight into the likely impact of climate change at Solva. The policy approach is to hold the line in the short

term but it is acknowledged that managed realignment will be necessary in the future with the need to **remove some properties from the flood plain.**

Members noted in the previous report that Natural Resources Wales (NRW) had not objected to the proposal. However a letter sent to all Chief Planning Officers in January 2014 makes it clear that the justification tests in TAN15 are a matter for the local planning authority to undertake with NRW's role being one of providing expert technical advice on flooding consequences.

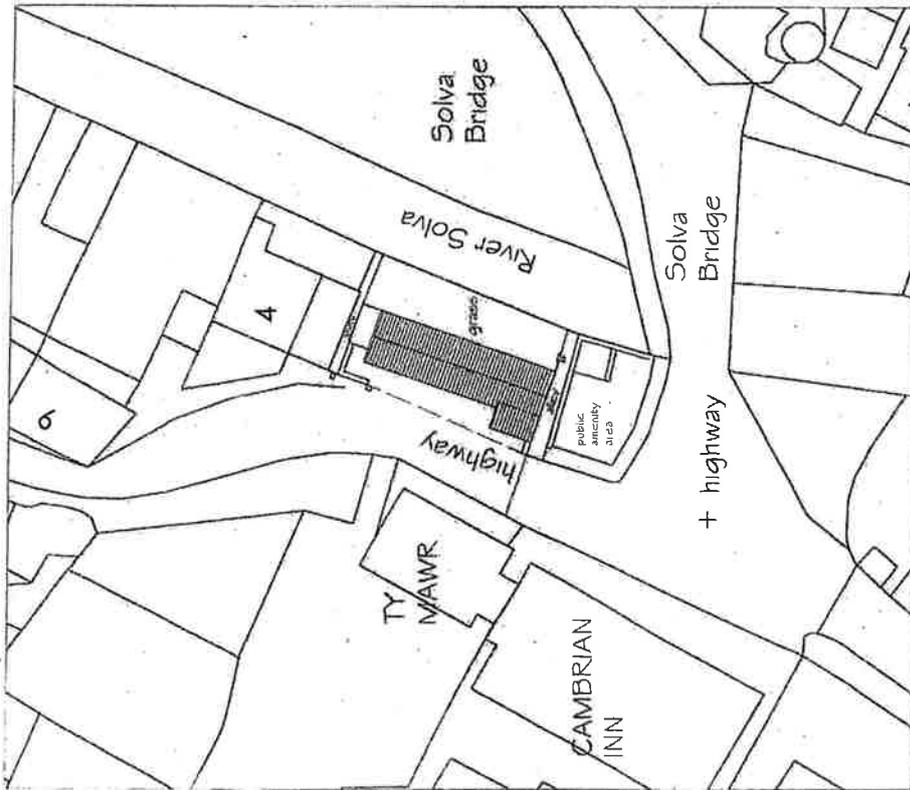
Conclusion

National Planning Policy and TAN 15 are explicit in that highly vulnerable development should not be permitted in Zone C. Other (non residential) types of development may, in exceptional circumstances be permitted where particular circumstances are met.

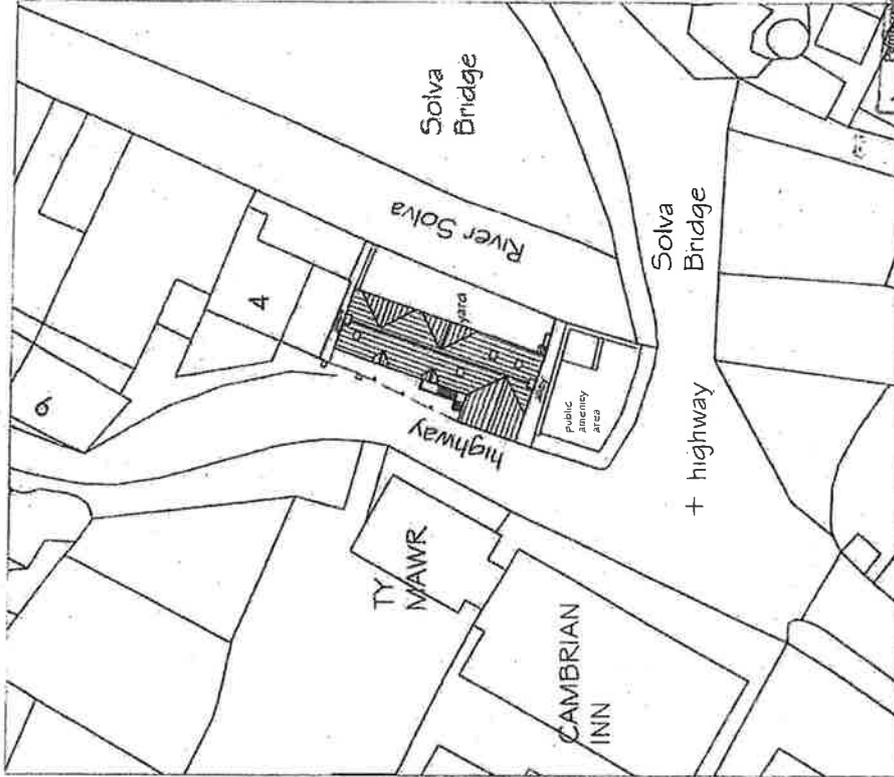
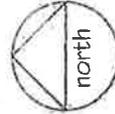
Recommendation

That the application be refused for the following reason:

1. The application site lies within Flood Zone C2, and proposes highly vulnerable residential development which is entirely contrary to advice contained within Planning Policy Wales Edition 10, Welsh Government Guidance Technical Advice Note 15: Development and Flood Risk, and Policy 34 of the Pembrokeshire Coast National Park Local Development Plan(adopted 2010).



EXISTING SITE LAYOUT PLAN

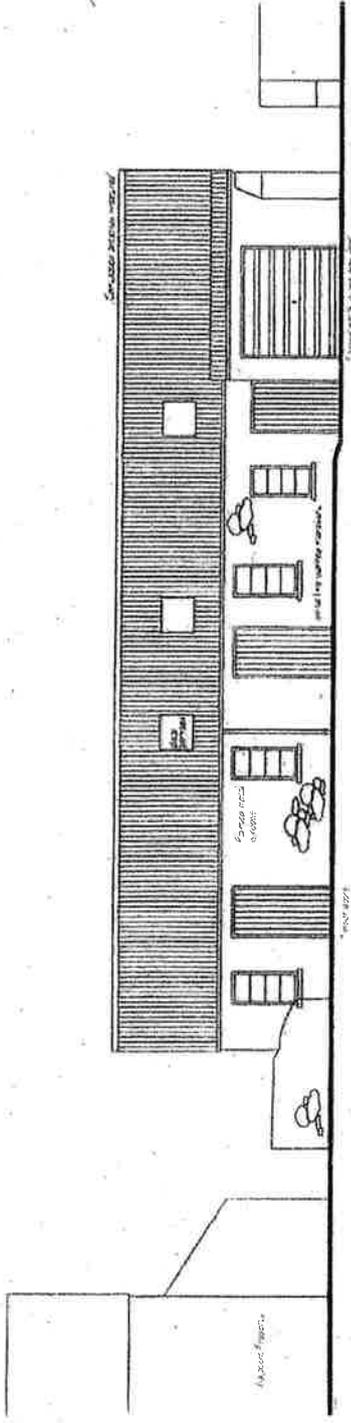


PROPOSED SITE LAYOUT PLAN

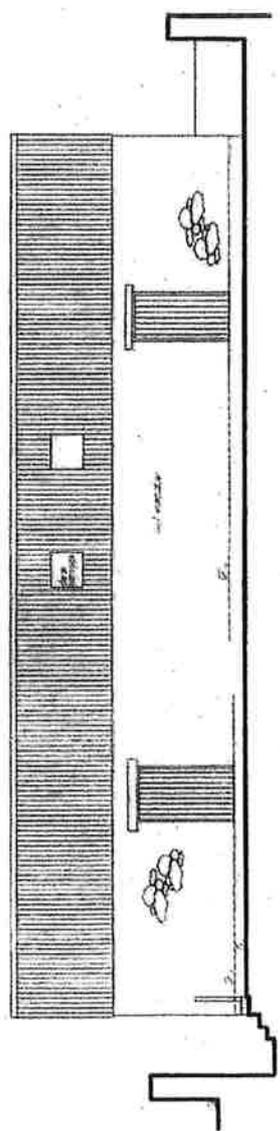
Permitted by the
 Pembrokeshire Coast
 National Park Authority
 21 DEC 2018
 Approved by the
 Pembrokeshire Coast
 National Park Authority
 21 DEC 2018

NP 18 7 66

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		<p>DATE</p> <p>Dec 18</p>	<p>PROJECT No.</p> <p>19000206</p>	

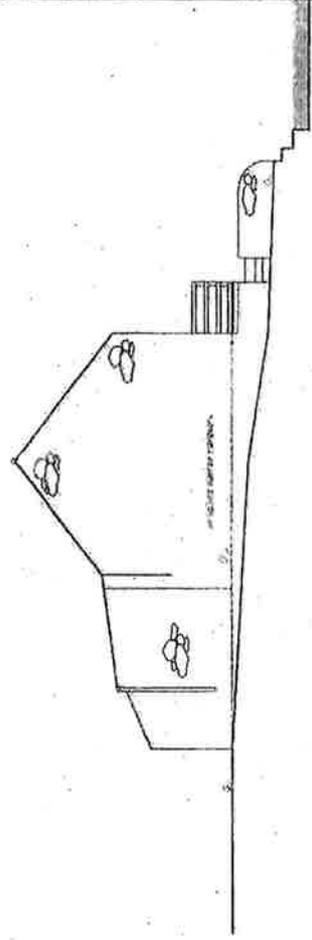


WEST ELEVATION



EAST ELEVATION

NP 18 7 66



SOUTH ELEVATION

Penetration Point
 Administration Building
 27 DEC 2018
 Approved Plans for Construction
 Approved Surface



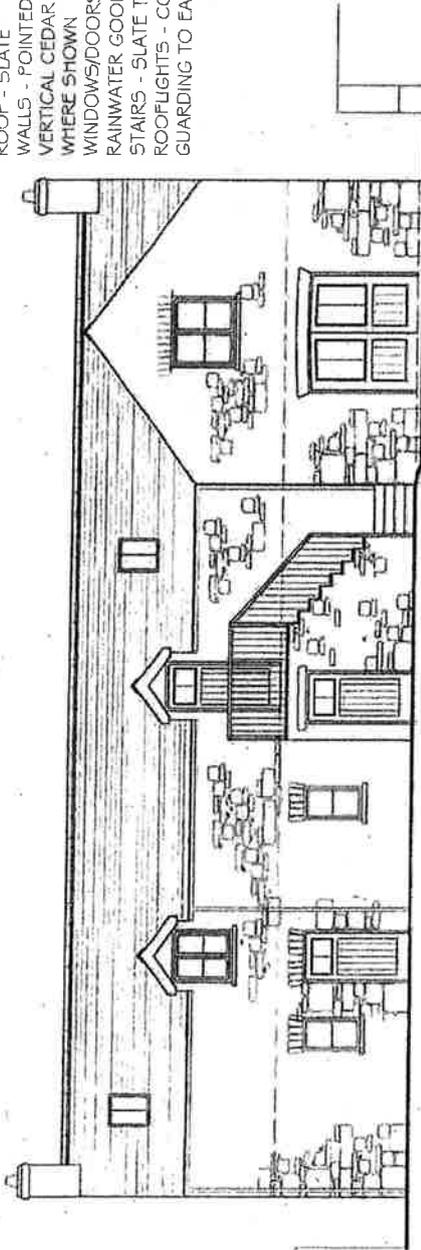
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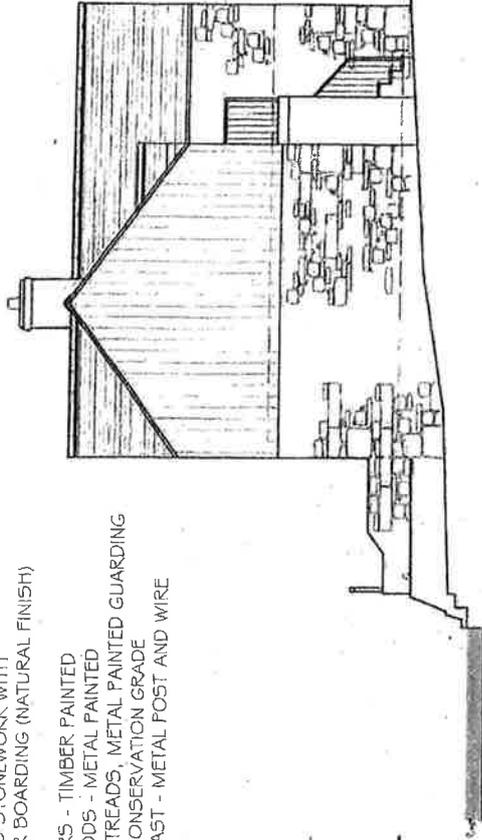
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PROJECT TITLE	CONVERSION OF OUTBUILDING AT TY MAWR, LOWER SOLVA.
SCALE	1-100 on A3
DRAWING NO.	19/02/02
DRAWING TITLE	SURVEY ELEVATIONS
DATE	Feb 09

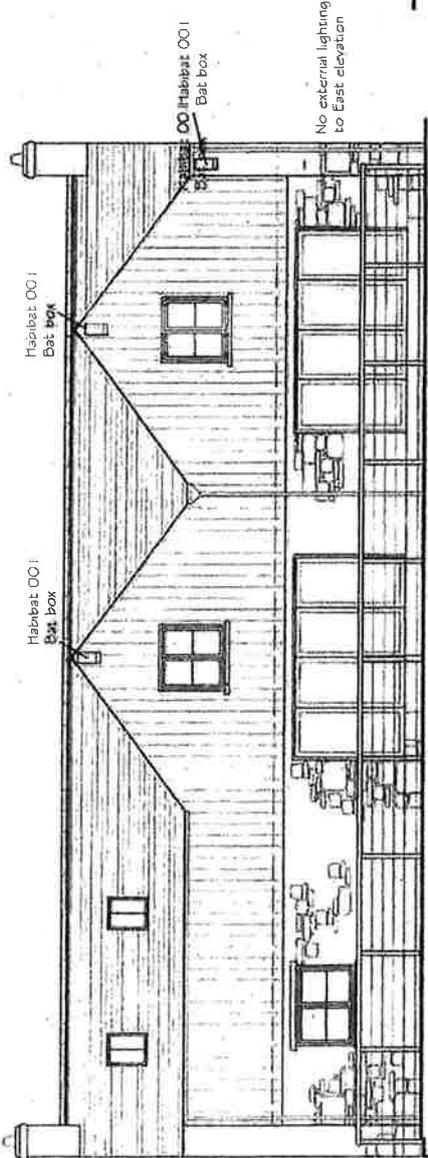
EXTERNAL FINISHES
 CHIMNEYS - RENDERED
 ROOF - SLATE
 WALLS - POINTED STONEMWORK WITH
 VERTICAL CEDAR BOARDING (NATURAL FINISH)
 WHERE SHOWN
 WINDOWS/DOORS - TIMBER PAINTED
 RAINWATER GOODS - METAL PAINTED
 STAIRS - SLATE TREADS, METAL PAINTED GUARDING
 ROOFLIGHTS - CONSERVATION GRADE
 GUARDING TO EAST - METAL POST AND WIRE



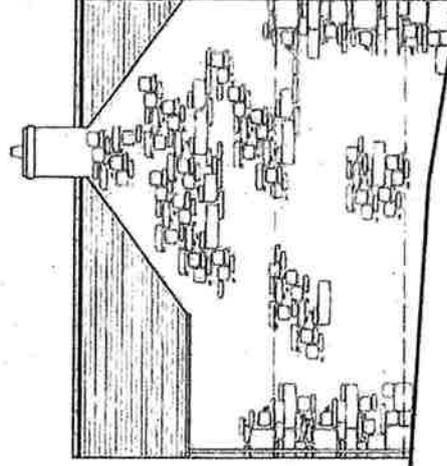
WEST ELEVATION



NORTH ELEVATION



EAST ELEVATION



SOUTH ELEVATION

Environment Canada
 National Park Authority
 21 DEC 2018
 Approved Plans & Resolutions
 Approval Number

1:100
 metres
 0 1 2 3 4 5

REVISION A-1-12-18
 WEST FACING GABLE SET BACK BY 450MM
 FOLLOWING HIGHWAY OFFICER COMMENTS

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	SCALE 1-100 on A3	DATE Dec 18
Planning Design Architecture <small>Digital Gate, (RCS), INC.</small> <small>6 Caradoc Place, Haverfordwest, T 01437 776708 E info@ianbartlettplanning.co.uk</small>	PROJECT TITLE CONVERSION OF OUTBUILDING AT TY MAWR, LOWER SOLVA.	DRAWING No. 198/0205
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