

**Application Ref: NP/19/0156/FUL**

**Case Officer** Kate Attrill  
**Applicant** Mr D Harries  
**Agent** Mr A Lawrence, Reading Agricultural Consultants  
**Proposal** Retention of static caravan for agricultural workers accommodation  
**Site Location** Velindre, St. Nicholas, Goodwick, Pembrokeshire, SA64 0LJ  
**Grid Ref** SM89453596  
**Date Valid** 18-Mar-2019      **Target Date** 11-Sep-2019

The application is referred to the Development Management Committee for determination as the officer recommendation differs from that of the Community Council.

**Consultee Response**

**PCC – Highways** : No Highways Objection  
**PCNPA Planning Ecologist:** No comment  
**PCNPA Access Manager:** No objection  
**PCC - Drainage Engineers:** No adverse comments  
**Pencaer Community Council:** No adverse comments  
**PCNPA Tree and Landscape Officer:** No adverse comments  
**Agricultural Advisor:** Concerns

**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 displayed for at least 21 days. In this case, both methods of notification were utilised . Four site notices were displayed opposite the site entrance from the 29th March 2019.

No written third party representations have been received. One phone call was received from a local resident concerned that the application site notices had not been seen, and an additional period for a written consultation to be sent in was agreed. No further comments have been received.

**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

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LDP Policy 08 - Special Qualities  
LDP Policy 09 - Light Pollution  
LDP Policy 11 - Protection of Biodiversity  
LDP Policy 29 - Sustainable Design  
LDP Policy 30 - Amenity  
LDP Policy 44 - Housing  
LDP Policy 45 – Affordable housing  
LDP Policy 52 - Sustainable Transport  
LDP Policy 53 - Impacts on traffic  
PPW10  
SPG06 - Landscape  
TAN 06 - Planning for Sustainable Rural Communities  
TAN 23 - Economic Development

### **Constraints**

LDP Mineral Safeguard  
Biodiversity Issue  
Safeguarding Zone  
Rights of Way Inland - within 50m  
Hazardous Zones  
Potential for surface water flooding  
Recreation Character Areas  
Affordable Housing Submarkets

### **Officer's Appraisal**

#### **Site and Context**

The farm holding extends to approximately 300ha (749 acres).

In addition to land within the farm holding, the farm also spreads slurry on an additional 80 hectares in the vicinity, and also rents 75ha of land at Penysgwarne Farm which is located approximately 3km to the north east of the site.

The holding currently has a milking herd of 860 cows which are housed indoors for the majority of the year and grazed outdoors when weather and soil conditions permit. There has been significant investment in buildings and infrastructure at the farm which has included a new accommodation building, cattle handling facilities and dairy including a 70-point rotary parlour which were approved retrospectively in 2015. Furthermore it is advised that these investments have improved cow welfare, with a resulting fall in culling rates and increased productivity, with the unit achieving yields in excess of 10,000 litres per cow per year.

The farm itself is within 2km of the Coast and is in proximity to two protected sites which include the St Davids Special Area of Conservation (SAC) and the Strumble

Head-Llechdarad Cliffs Site of Special Scientific Interest (SSSI). The wider area is mainly agricultural, with dairy and some arable farming along with tourism.

The farm employs 10 workers, all of whom currently work and live on site in addition to the farm manager who lives off site but is on-site daily. 4 staff occupy the farmhouse, a barn conversion is occupied by 2 staff, and two static caravans are located to the immediate north east with 2 staff in each caravan. Only one of the caravans has been applied for within this application, the other is claimed to be lawful as it has been on-site since 2014 but no application to regularise this has been submitted.

### **Relevant Planning History**

- NP/19/0158/FUL Extension to calf building, extension to dry cow building, slurry reception pit, storage building, silage clamp & hard-standing area (Retrospective) – Approved 11/07/2019
- NP/19/0155/FUL Extension to weaned calf building (Retrospective) – Approved 08/07/2019
- NP/15/0086/FUL Cattle accommodation building and open yard area (Retrospective) - Approved 15/04/2015
- An application for a slurry lagoon was approved by Pembrokeshire County Council under 14/1071/PA on 26 May 2015 (a copy is enclosed for information in Appendix 1). [Note: this application was NOT within Pembrokeshire Coast National Park boundary].
- NP/14/0311 - Proposed cattle accommodation building (part retrospective), associated yard area & slurry lagoon - Refused 21 January 2015
- NP/13/0270 – Velindre Farm, St Nicholas – Cattle Accommodation Building, Dairy Building, Access Track and Silage Storage Area (Retrospective) – Approved 25 September 2014
- NP/05/564 – Velindre Farm, St Nicholas – Conversion of outbuilding to dwelling – Approved 14 February 2006
- NP/01/543 – Velindre Farm, St Nicholas – Cattle Housing – Approved 7 January 2002
- NP/238/95 – Velindre Farm, St Nicholas – Agricultural Buildings – Approved 25 July 1995
- NP/184/88 – Velindre Farm, St Nicholas – Extension – Approved 20 May 1988
- NP/583/83 – Velindre Farm, St Nicholas – Cattle Feeding Area – Approved 22 December 1983

- NP/137/82 – Velindre Farm, St Nicholas – Erection of Cattle Shed – Approved 22 June 1982

## **Description of Proposal**

The application proposes retention of one static caravan, the middle one of three located to the north east of the farmhouse. The application is submitted for retrospective planning permission.

The southern caravan has been in place within the garden area to the farmhouse for a number of years and does not form part of this application.

The northernmost caravan also does not form part of this application, although the applicant has been advised that it should be included in the application as it does not benefit from any permission. The applicant's agent has stated that the northernmost caravan is intended to be moved to replace the oldest caravan within the residential curtilage, but it would still require planning permission to be occupied as an independent unit as its use would not be ancillary to that of the farm house.

## **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

### ***Policy:***

The general thrust of National Policy in the form of Planning Policy Wales (PPW) (Edition 10, December 2018) and Technical Advice Note 6 acknowledges support for farming and particularly sustainable agriculture.

In terms of countryside protection policies in the Local Development Plan, Policy 7 – Countryside, sets out the types of developments that will be permitted in countryside locations (i.e. outside of a recognised Centre). This includes, within criterion (h), farm buildings which are justified for agricultural purposes. The supporting text to this policy, at paragraph 4.43 of the LDP advises “The National Park countryside is an important contributor to tourism, farming, conservation etc. Issues for the Park include finding the right approach to the amount of development to be permitted, taking account of accessibility issues, the need to sustain local communities and the need to protect the National Park landscape.”

Technical Advice Note 6 sets out a number of tests for additional accommodation on established farming enterprises at 4.4.1 and which the Authority's Agricultural Consultant has been consulted on.

Local and National Planning Policy contains a basic presumption against development in the open countryside unless it is required for essential rural workers who have a special need to permanently be on site.

Criterion (b) of Policy 7 of the Local Development Plan refers to allowing residential development consisting of housing if it is for essential farming or forestry needs. This policy requires that any housing provided in the open countryside will prioritise affordable housing.

In respect of rural enterprise dwellings, the most recent and appropriate policy guidance was issued by Welsh Government in 2010 as Technical Advice Note 6 (TAN 6).

The following paragraphs of TAN 6 are relevant to this application:

4.6.2 Where the case is not completely proven for a dwelling permission should, not be granted for it, but it may be appropriate for the planning authority to test the evidence by granting permission for temporary accommodation for a limited period. Three years will normally be appropriate to ensure that the circumstances are fully assessed. If such a permission for temporary accommodation is granted, permission for a permanent dwelling should not subsequently be given unless the criteria in paragraphs 4.4.1 or 4.6.1 are met. The planning authority should make clear in planning conditions the period for which the temporary permission is granted and that the temporary dwelling will have to be removed when that period expires. It should also include an informative attached to the planning decision notice stating the requirements that will have to be met if a permanent permission is to be granted. It will be unsatisfactory to grant successive extensions to a temporary permission if that will result in a permission having a total duration of more than three years.

4.3.1 One of the few circumstances in which new isolated residential development in the open countryside may be justified is when accommodation is required to enable rural enterprise workers to live at, or close to, their place of work. Whether this is essential in any particular case will depend on the needs of the rural enterprise concerned and not on the personal preference or circumstances of any of the individuals involved. Applications for planning permission for new rural enterprise dwellings should be carefully assessed by the planning authority to ensure that a departure from the usual policy of restricting development in the open countryside can be fully justified by reference to robust supporting evidence.

4.8.1 A functional test is necessary to establish whether it is essential, for the proper functioning of the enterprise, for one or more workers to be readily available at most times. It should relate to unexpected situations that might arise, for which workers are needed to be on hand outside of normal working hours for the particular enterprise. Such requirements might arise, for example, if workers are needed to be on hand night and day to deal with an emergency that would threaten the continued viability and existence of the enterprise without immediate attention. Where there are existing dwelling(s) on the enterprise then the need for additional workers to live on the site for the proper functioning of the enterprise must be demonstrated to be essential.

TAN 6 goes on to elaborate that the functional test must be underpinned by a financial test to show the development is viable and is likely to continue to be viable, that any potential buildings suitable for conversion on the holding should be

considered first, and that any dwellings in nearby proximity should also be considered.

The TAN 6 tests are set out in bold with the Authority's Agricultural Consultant's Comments following.

- a) **There is a clearly established existing functional need** - there is a clearly established existing functional need – The agent's report states that 7 workers are needed on site during milking which occurs from 06.00hrs up until 23.00hrs . 2 of these are the Calving / calf management team who are on call. It is questionable as to whether all 7 (or indeed 10) are needed at the same time overnight.
- b) **the need relates to a full-time worker, and does not relate to a part-time requirement;** - A review of the labour units required for this size and type of operation showed them to be broadly accurate. The lowest figure calculated is 12 staff and highest 18. Therefore the figure of 14.3 provided by the agent is acceptable. However with permanent accommodation for 6 staff on site already and the herd manager living off-site there is not considered a need for additional staff to be on site at all times. The 2 staff in the caravan that are on call due to calving duties could be accommodated in the farm house if needed in place of others.
- c) **Financial justification** – the enterprise concerned has been established for at least three years, profitable for at least one of them and both the enterprise and the business need for the job, is currently financially sound, and has a clear prospect of remaining so; The size and scale of the business suggests that this criteria could be fulfilled however we have no detailed information to confirm this.
- d) **The functional need could not be fulfilled by another dwelling or by converting an existing suitable building already on the land holding comprising the enterprise, or any other existing accommodation in the locality which is suitable and available for occupation by the worker concerned;** - Alternative properties for conversion/ purchase – a 4 bed holiday unit is currently being let out at Woodlands Farm, 1.5 miles from the farm at Velindre and where the current farm manager lives. The applicant has been asked why this building could not be used to accommodate a number of workers not needed to be on emergency call at night, but no response has been received to date (letter requesting further information sent 11th July, report written mid August).  
An extension to one or other of the existing dwellings could be contemplated. There is a limited stock of suitable properties in the vicinity but we note there were properties on Rightmove within a 5 mile radius /10 minute drive that are available.
- e) other normal planning requirements, for example siting and access, are satisfied.

***Alternative Accommodation Test:***

The applicant stated at submission stage that it did not have any capacity for conversion of buildings, but it has become evident since then that Woodlands Farm, which is occupied and owned by the farm manager, also has a four bedroom holiday unit adjacent to the main farm house. Whilst Woodlands lies in Pembrokeshire

County Council's jurisdiction, it lies only 1.5 miles from the farm at Velindre. A planning condition currently restricts its use to holiday accommodation, but this could potentially be varied to allow for agricultural workers.

Based on the comments of the Authority's Agricultural Consultant, and the lack of response to our requests for further information, it is not considered that the proposal complies with the requirements of TAN6 and thus is contrary to national planning policy. It is therefore not considered appropriate to grant permission for temporary accommodation for a limited period in accordance with paragraph 4.6.2 of TAN 6.

***Special Qualities of the National Park:***

Policies 1, 8 and 15 of the Local Development Plan refer to the duty to conserve and enhance the National Park, the protection of the special qualities of the Park, and the development which would adversely affect the qualities and special character of the Park respectively.

Policy 15 is considered to be the most relevant to this application:

Development will not be permitted where this would adversely affect the qualities and special character of the Pembrokeshire Coast National Park by:

- a) causing significant visual intrusion; and/or,
- b) being insensitively and unsympathetically sited within the landscape; and/or
- c) introducing or intensifying a use which is incompatible with its location; and/or
- d) failing to harmonise with, or enhance the landform and landscape character of the National Park; and/or
- e) losing or failing to incorporate important traditional features.

The caravans have been sited to the immediate north east of the farmhouse, but at a significantly higher level due to rising land levels. The farming complex is well located in the wider landscape, having limited visibility from the west, but the caravans are clearly visible from the bridleway which runs through the site. The special qualities and special character of the National Park are therefore considered to be harmed by this application.

***Amenity and Privacy:***

Policy 30 of the Local Development Plan refers to amenity and states that development will not be permitted where it has an unacceptable impact on amenity, particularly where:

- a) the development is for a use inappropriate for where people live or visit; and/or
- b) the development is of a scale incompatible with its surroundings; and/or
- c) the development leads to an increase in traffic or noise or odour or light which has a significant adverse impact; and/or
- d) the development is visually intrusive.

The supporting text to this policy states that this policy aims to protect the amenity enjoyed by people in their residences, work spaces and recreational areas, and that amenity is defined as those elements in the appearance of town and countryside which makes for pleasant life rather than a mere existence.

The caravans themselves do not have the standard of private amenity space which would ordinarily be afforded a dwelling, and have a poor relationship between each caravan in terms of privacy. The proposal is therefore not in compliance with Policy 30.

### ***Access and Parking:***

The Highways Department of PCC has been consulted in respect to any potential impact from a highways point of view.

Their consultation response highlights that as the caravan is set well away from the main yard it will not lead to increased traffic on the Highway. The proposed development is therefore considered to comply with Policy 53 of the LDP.

### **Conclusion**

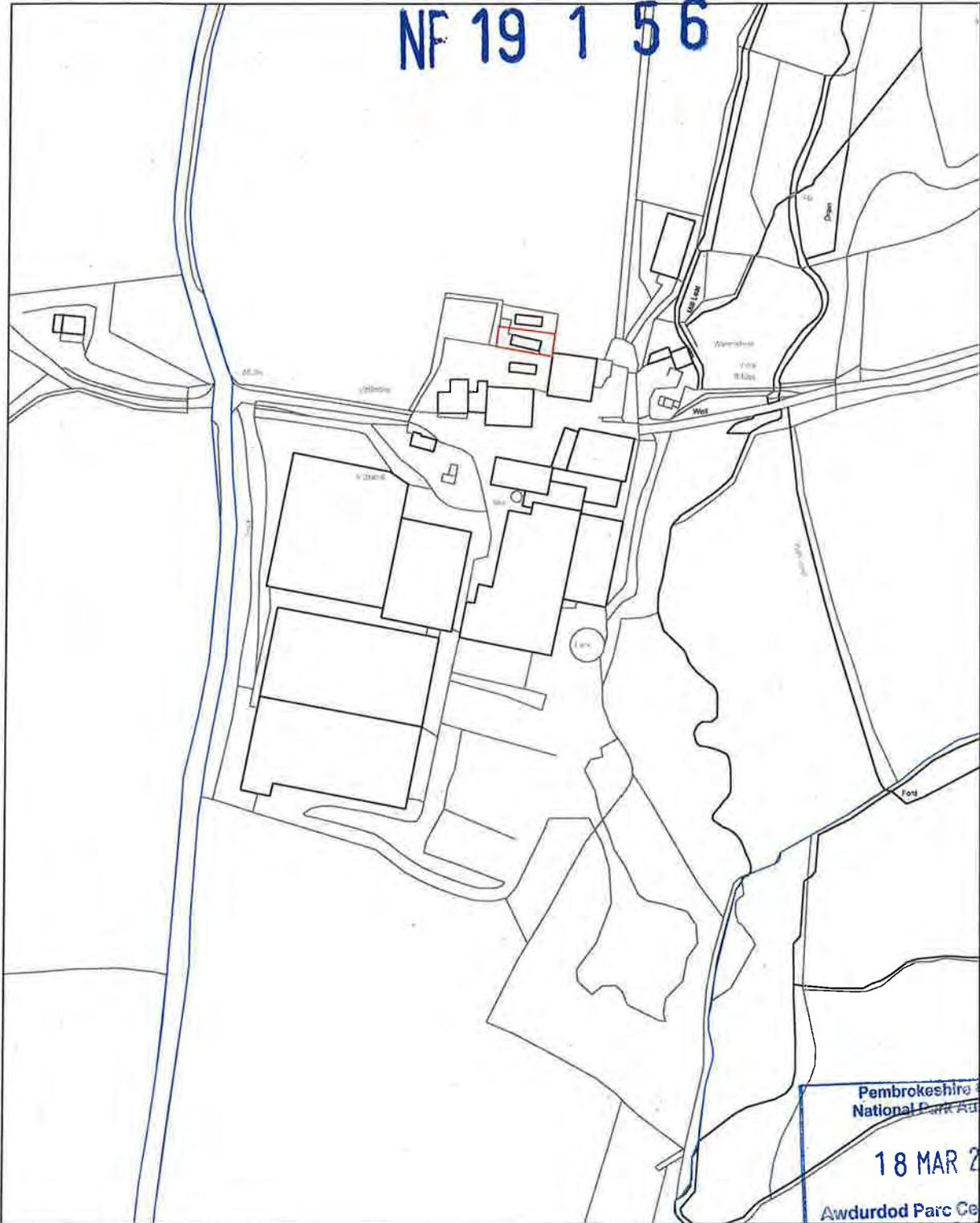
The application fails to demonstrate the need for the additional workers accommodation to be sited in a static caravan when there is potential alternative accommodation located on the farm holding and is therefore contrary to the guidance in TAN6 and Local Development Plan Policies. The retention of the caravan will also result in harmful impacts on the special qualities of the National Park and amenity.

### **Recommendation**

#### **REFUSE, for the following reason(s):**

1. The application fails to demonstrate that there is a need for additional permanent accommodation over that which is already provided for on-site and that could not be provided elsewhere on the land holding or in its vicinity in accordance with the guidance contained in Technical Advice Note 6: Planning for Sustainable Rural Communities (2010).
2. The siting of the static caravan fails to protect and enhance the special qualities of the National Park and would adversely affect the qualities and special character of the National Park, contrary to Policies 8 and 15 of the Pembrokeshire Coast National Park Local Development Plan.
3. The provision of a static caravan for permanent accommodation fails to provide for an adequate standard of amenity for its occupants and is therefore contrary to Policy 30 of the Pembrokeshire Coast National Park Local Development Plan.

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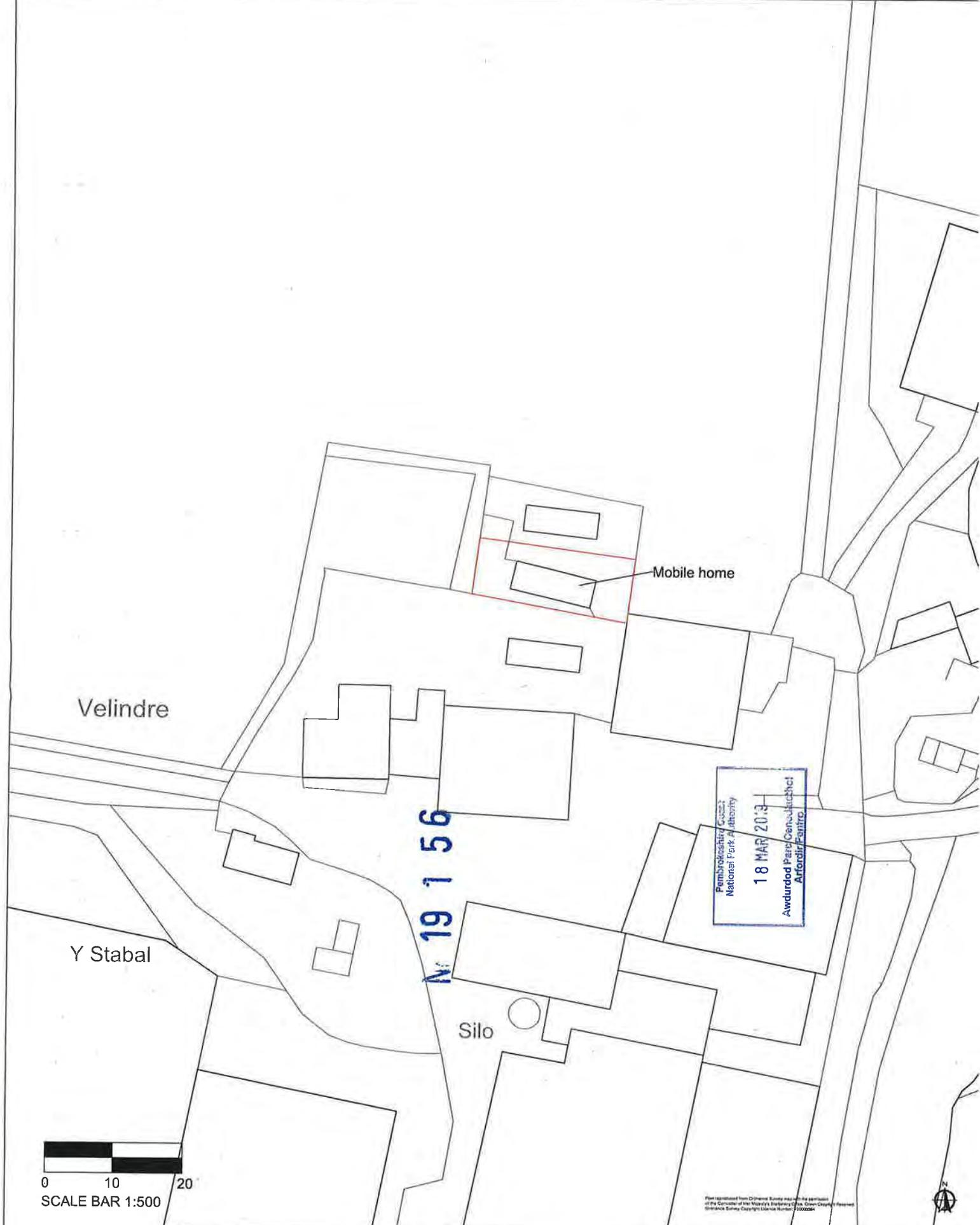
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National Park Authority  
18 MAR 2019  
Awdurdod Parc Cenedlaethol  
Arfordir Penfro

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| Drawing title<br>LOCATION PLAN                                                    | Ref.<br>RAC/6199/1   | Rev.               |      |         |      | Reading Agricultural Consultants Ltd<br>Gate House<br>Beechwood Court<br>Long Toll<br>Woodcote<br>RGB ORR<br>01491 684233<br>www.readingagricultural.co.uk |
| Contract<br>VELINDRE FARM<br>ST NICHOLAS<br>GOODWICK<br>PEMBROKESHIRE<br>SA64 0LJ | Drawn by<br>HTD      | Checked by<br>IDW  |      |         |      |                                                                                                                                                            |
|                                                                                   | Scales<br>1:2,500@A4 | Date<br>25/02/2019 |      |         |      |                                                                                                                                                            |
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Pembrokeshire Council  
 National Park Authority  
 18 MAR 2013  
 Awdurdod Pârff Cenedlaethol  
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Plot dimensioned from Ordnance Survey map and the approval of the Council of the Mayor's Electricity Office. Green Chain's Street  
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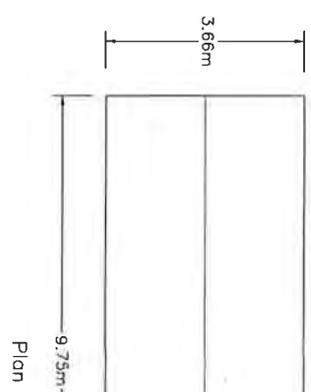
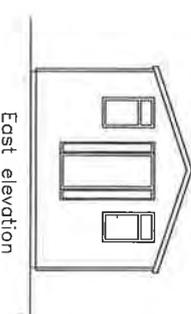
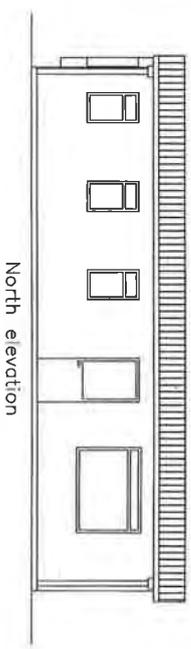
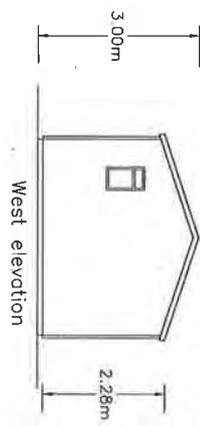
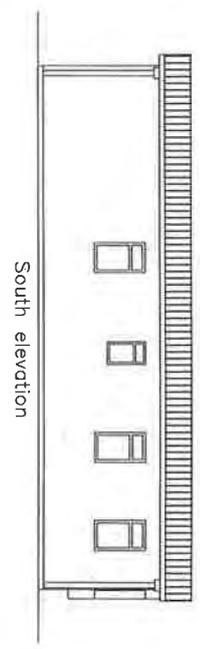
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