

**Application Ref: NP/11/398**

<b>Application Type</b>	Full
<b>Grid Ref:</b>	SM84033144
<b>Applicant</b>	Mr Tom O'Kane
<b>Agent</b>	
<b>Proposal</b>	Low impact development comprising a new dwelling, agricultural buildings, volunteer accommodation, education room, farm shop, solar panel array, polytunnel, compost toilet building and associated trackways and parking
<b>Site Location</b>	Land Adjacent to Binchurn Farm, Trefin, Haverfordwest, Pembrokeshire, SA62 5AE
<b>Case Officer</b>	Vicki Hirst

**1.0 Summary**

**1.1** This application originally sought planning permission for a low impact development (LID) comprising a new dwelling, agricultural buildings, education room, farm shop, wind turbine and associated trackways and parking on land to the west of Binchurn Farm, Trefin.

**1.2** The application was subsequently amended to re-locate the main group of buildings and replace the wind turbine with a ground mounted solar panel array. Alterations to the planting have also been included.

**1.3** The application has generated a considerable amount of representation and should be determined with regard to the Development Plan policies and other material considerations, namely Welsh Government advice set out in Technical Advice Note 6.

**1.4** The main policy to consider is policy 47 of the Local Development Plan (LDP) which relates to LID making a positive contribution. There are eight criteria to be met and it is not considered that the proposal conforms with criteria a, b, d and f.

**1.5** Furthermore it is not considered that the proposal complies with a number of the more generic policies within the LDP in relation to the special qualities of the National Park, nor with the advice in national guidance, namely Technical Advice Note 6. The statutory purpose of the National Park Authority and its requirement to conserve and enhance the National Park's natural beauty and cultural heritage is compelling in this case and the application is therefore recommended for refusal.

### **Consultee Response**

**Llanrhian Community Council:** Objecting - The issues raised are building in the open countryside is not desirable, development would double the size of Llanon, would have a high visual impact which is out of character with the area, and building design.

**Countryside Council for Wales:** Conditional Consent

**Environment Agency Wales:** No objection

**Welsh Water:** Reply - As the applicant intends to utilise private treatment works Welsh Water have no comment to make.

**PCC - Transportation & Environment:** Conditional Consent

**Mathry Community Council:** Reply - Councillors felt very strongly that approval would create a precedent on the use of a green field site within the area.

**Mathry Community Council:** Objecting - Additional objection points: -  
Business plan unrealistic, scale of investment disproportionate to scheme's aims to be sustainable and low impact, other applications for dwellings in Llanon have been refused etc.

### **Officer's Appraisal**

#### **2.0 Background**

**2.1** The application site comprises approximately 15.2 acres of pasture and rough grazing/woodland to the east of the small hamlet of Llanon, 1 mile south of Trefin. The site is undeveloped and is bordered by mature, native hedgerows and an area of scrub/woodland to the west. The land slopes gently upwards from north to south.

**2.2** A pre-application enquiry was received earlier this year in relation to the possibility of establishing a low impact development on the land. (PA/11/0096). No view was expressed on the acceptability of the proposal but advice was given on the requirements for such an application.

#### **3.0 Current Application**

**3.1** This application originally sought planning permission for a low impact development comprising a new dwelling, agricultural buildings, education room, farm shop, wind turbine and associated trackways and parking on land to the west of Binchurn Farm, Trefin.

**3.2** The application was accompanied by a significant amount of information which is available should members wish to read the full content but comprising:

Design and Access Statement and Design and Sustainability Statement  
Transport Statement and Travel Plan

Management Plan

Code for Sustainable Homes Assessment indicating the dwelling will achieve Level 5.

Soil Survey and Crop Rotation Information

Carbon Analysis and Ecological Footprint Analysis

Ecological Survey

Community Impact Assessment

Landscape Visual Assessment

Household Data

**3.3** The applicant wishes to establish a low impact development and land based business on the site. His vision is to create a sustainable and functional home for his family, and produce and sell a range of home grown organic products, including fruit and vegetables and seeds which will be sold from a new farm shop on the land and through local businesses. He will offer educational opportunities to a cross section of local and wider community groups and individuals and enhance and protect the diversity of the site whilst living a low impact lifestyle. The site will be developed along permaculture principles and originally included a number of new buildings, in particular a dwelling, volunteer barn, workshop and educational room, animal barns, polytunnel, farm shop and compost toilet.

**3.4** The buildings will be constructed of timber frame structures with straw bale and lime and earth plaster/larch cladding walls and turf/sedum, mono pitch roofs, with locally sourced timber joinery. The house will contain three bedrooms and the volunteer barn will provide bunkhouse accommodation for groups on educational visits. The application also originally included the erection of a 9 metre high wind turbine in the south east corner of the site.

**3.5** The land will be divided up to provide areas for cereal, fodder and livestock, meadow, broadleaf and fruit planting, and vegetable garden, together with the "built" area comprising the house, animal sheds, volunteer barn, educational room and farm shop.

**3.6** During the processing of the application, amended plans were provided and amendments made to the management plan and landscape and visual assessment to relate to these changes, and additional information was provided in relation to the impacts of volunteers engaged on the project.

**3.7** The main changes to the plans involve providing the "built" area in the south east corner of the site to the east of the entrance drive with the exception of the polytunnel which will be provided in the north west of the site. The house has been amended to be single storey, and the volunteer barn reduced in size to accommodate only two volunteers, and the education room and barn reduced in size and altered in design. The wind turbine has been withdrawn from the application, and a new proposal for a ground mounted solar panel array in the northern part of the proposed car park has been included. Some changes have also been made to the layout of the planting and food production areas. The amended layout plans and design drawings are attached to this report.

**3.8** The application was reported to the Development Management committee on 14<sup>th</sup> December 2011 where it was resolved that members should visit the site prior to the full consideration of the application. The site visit took place on 9<sup>th</sup> January 2012.

#### **4.0 Policies**

LDP Policy 01 - National Park Purposes and Duty

LDP Policy 07 - Countryside

LDP Policy 08 - Special Qualities

LDP Policy 11 - Protection of Biodiversity

LDP Policy 15 - Conservation of the Pembrokeshire Coast National Park

LDP Policy 21 - Minerals Safeguarding

LDP Policy 29 - Sustainable Design

LDP Policy 30 - Amenity

LDP Policy 32 - Surface Water Drainage

LDP Policy 33 - Renewable Energy

LDP Policy 47 - Low Impact Development

LDP Policy 53 - Impacts on traffic

PPW4 Chapter 04 - Planning for Sustainability

PPW4 Chapter 05 - Conserving and Improving Natural Heritage and the Coast

PPW4 Chapter 08 - Transport

PPW4 Chapter 09 - Housing

PPW4 Chapter 12 - Infrastructure and Services

SPG02 - Low Impact Development making a positive contribution

SPG06 - Landscape Character Assessment Study, June 2009

SPG08 - Validation of Planning Applications

SPG11 - Safeguarding Mineral Zones

SPG14 - Renewable Energy

TAN 02 - Planning and Affordable Housing

TAN 05 - Nature Conservation and Planning

TAN 06 - Planning for Sustainable Rural Communities

TAN 08 - Renewable Energy

TAN 12 - Design

TAN 18 - Transport

TAN 22 - Planning for Sustainable Buildings

#### **4.1 Public Response**

**4.2** The application has been advertised by the display of a site notice and by individual notifications to nearby residents.

**4.3** Over 200 objections have been received, from individuals, a locally appointed steering group in respect of this application and their legal representative, and from the neighbouring Mathry Community Council. The main issues raised to the original plans are:

- The development cannot be called low impact in view of its size
- There will be no public benefit or economic contribution from the project
- The data in the application is questionable particularly with regard to financial information, household data and income – it is wildly optimistic and unrealistic
- The proposal will be visually intrusive
- The turbine will be highly visible, noisy and unlikely to produce enough electricity for the site
- Building in the open countryside is contrary to National Park policies
- The proposal fails to meet a number of adopted development plan policies
- Views from existing houses will be spoiled
- There will be a negative impact on Trefin Conservation Area
- The National Park is sacrosanct and should be protected from development
- The designs are inappropriate and do not reflect local, traditional buildings or sit well with the topography
- The planting will fail in this exposed, coastal location
- The traffic will be hazardous and the roads are unsuitable
- It is not fair to allow this development when local people cannot gain planning permission for their own requirements
- There are concerns in relation to the volunteers being youth offenders
- There will be an adverse effect on tourism
- The proposal is reliant on grant aid
- There has been no agreement for rainwater harvesting off the adjacent barn
- There will be light pollution
- The turbine will have an adverse effect on birdlife
- The farm shop will be in direct competition with other local businesses decreasing their viability
- There are many other sites for sale with buildings and land that could be used for this proposal without using an undeveloped piece of land
- There will be increased pressure on existing services
- What will happen if the site is sold on and different principles apply?
- There is no evidence of demand for the products to be grown or for the education facility
- Volunteers will need CRB checks

- Approving the development will lead to an undesirable precedent for further proposals
- No site notices have been displayed
- The plans are of poor quality and do not provide sufficient information in relation to levels and detail.

**4.4** Following receipt of the amended plans a further consultation was carried out and over 100 responses were received from the above parties, and including a representation from the Friends of the National Park. Many reiterated the above comments but additional comments were made regarding:

- The removal of the turbine is welcomed
- There will be an impact on the area from an eco-village
- The re-siting of the buildings has not addressed their visual impact; in fact they will be more visible being closer to the road
- The solar panels will be visually intrusive
- Fear of permission creep – the development will start small and expand
- How will all the workload and construction be done by one man
- There is no need for a residential property on the site
- The education element is already provided for in the area
- Why are volunteer cabins needed?
- There will be a negative visual impact from connecting to the grid
- The key to the National Park is not development it is preservation
- The policy should only be applied to certain areas of the National Park and where its purposes conflict conservation should prevail.
- There are objections to the approach to residents by the applicant and the use of the press to promote the application

As it can be seen the representations received raise numerous issues, which are addressed throughout the following analysis of the application.

## **5.0 Analysis**

**5.1** This application is on the agenda at the discretion of the Head of Development Management due to the significant public interest in the proposal and due to the issues that the proposal raises. The analysis of this application has been undertaken with regard to the amended plans, not the original plans but takes account of original representations and consultation responses where these are relevant to the overall development.

**5.2** The development must secure the conservation and enhancement of the natural beauty, wildlife and cultural heritage of the National Park (Policy 1 and Policy 15) and its special qualities. Policy 1 is the one overarching policy in the Plan that deals with National Park purposes and duty. The Authority has also prepared and adopted Supplementary Planning Guidance on Landscape (adopted June 2011) which is of direct relevance.

**5.3** Policy 7(g) Countryside allows for low impact development that makes a positive contribution as set out in Policy 47.

**5.4** This application falls to be considered in the main against Policy 47 of the Local Development Plan, which relates to Low Impact Development making a Positive Contribution. The policy 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 (LID) is also of direct relevance. The SPG sets out the National Park Authority's approach to proposals submitted under policy 47 and what issues an applicant will need to address to meet the tests in the policy.

**5.5** In addition Technical Advice Note 6 – Planning for Sustainable Rural Communities published by the Welsh Government in July 2010 contains advice in relation to One Planet Developments and takes forward LID principles in the Welsh context. It provides advice on the information required with an application, and how proposals must justify the need to live on site and how the inhabitant's requirements in terms of income, food, energy, and waste assimilation can be obtained directly from the site. The Government is currently preparing additional guidance on these matters but to date this has not been published.

**5.6** In the above policy context, the proposal requires analysis, not only with regard to the Authority's own policies but also with regard to TAN 6 which is a material consideration. Members should note that a draft version of TAN 6 (which included provision for One Planet developments) was published prior to the adoption of the LDP. This introduced for the first time at a national level the Welsh Government's commitment to One Planet Developments which have similar characteristics to what this Authority knows as LID. Evidence was put to the Local Development Plan Examination in March 2010 that the emerging TAN 6 did not acknowledge the outward focus of projects sought in the LDP policy, it did not address the need to protect and enhance the environment adequately and the standard to be achieved regarding transport impacts was not set out. The Authority considered that the tailored approach to local circumstances as set out in policy 47 was more appropriate. This tailored policy approach was recommended by the Inspector and subsequently adopted.

**5.7** Members should also note that the most recent case for considering how to deal with cases and the comparative weight to be given to the national and local policy was in respect of a low impact horticultural smallholding in Coshaston (NP/10/017). In determining that appeal the Inspector determined the appeal with regard to whether the development was in accordance with Policy 47. The Low Impact Development Making a Positive Contribution Supplementary Planning Guidance was considered to be 'appropriately prepared and adopted' and was given significant weight. It provides guidance on how Policy 47 is to be applied. The Inspector also 'had regard' to the Government's policy and advice as set out in Planning Policy Wales and Technical Advice Note 6 in relation to One Planet Developments.

**5.8** Consequently, the main issue to be determined is whether the proposal is an acceptable low impact development in accordance with LDP Policy 47, when considered also in relation to the Welsh Government's policy and guidance, and consequently a justifiable exception to the strong presumption against development in the countryside. In any event, where not already addressed by consideration of Policy 47 criteria, regard is also to be had to the impact of the proposals on the attributes of the National Park and on the landscape.

**5.9** In the context of the above, the starting point must be the development plan and in this respect all eight criteria of policy 47 are required to be met. The report will consider each criterion in turn.

***a. Make a positive environmental, social and/or economic contribution with public benefit***

**5.10** In dealing with the Cosheston appeal, the Inspector considered that it was not necessary for a LID development to provide all three of these contributions. It should however demonstrate a positive environmental contribution *together with* either a social or economic one. Criterion a) clearly requires wider public benefits to be demonstrated rather than simply benefits to the occupier.

**5.11 *Environmental benefits:*** The applicant states that a number of environmental benefits will arise from this proposal, with the repair of hedges with local provenance stock, coppicing of sycamore scrub, scrub area reserved for wildlife, pond creation, organic land management, planting native woodland, re-instatement of field boundaries, seed saving vegetables adapting to changing climate, introduction of bee hives and bee plants, inclusion of a barn owl box and restriction of work near Japanese knotweed.

**5.12** The ecological survey submitted with the application found that the site comprises two similarly sized agricultural fields (c 1.5 hectares) and a small area of scrub woodland (c 1 hectare). The land is predominantly arable and has been ploughed, re-seeded and grazed. The hedgerows have been damaged with large gaps being evident and the main ecologically diverse area is the area of scrub woodland to the west of the site. There is also evidence of two single hole badger setts within this area (badgers being a protected species) and also an area of Japanese Knotweed, the spreading of which constitutes an offence. The report makes a number of recommendations to repair the hedgerows, the coppicing of the scrub woodland in the interests of long term management and the prevention of the spread of any knotweed. The applicant also indicates that GLASTIR funding is being sought for additional woodland planting within the site.

**5.13** The Authority's Conservation team concurs with the ecological survey that has been carried out and considers that the existing arable fields do not offer much in the way of biodiversity. The re-introduction of smaller fields following to some degree historic boundaries is beneficial to the landscape and the reintroduction of additional field boundaries and their management



will enhance the hedgerow and woodland corridors and provide greater connectivity for biodiversity. In addition it is accepted that the organic nature of the enterprise will aid the ecology and bio-diversity of the site.

**5.14** Notwithstanding these benefits, it is evident that most of these measures are intended to support the LID rather than having any additional public benefit. Whilst there will inevitably be some benefit from having greater connectivity in the hedgerows and thus wildlife corridors and some additional carbon absorption from the new planting, the benefits arising from this are considered to be relatively minor and in the main benefit the applicant for fuel and food supply. The SPG clearly requires wider public benefits to be demonstrated and the public benefit is negligible in this case, in particular taking account of the negative impacts arising from the presence of this development to achieve these environmental gains, due to the visual impact which is fully discussed under criterion d) below.

**5.15** As such it is not considered that this proposal provides an environmental contribution with wider public benefits sufficient to comply with criterion a) of policy 47 in relation to environmental matters.

**5.16 *Social and economic benefits:*** With regard to the social and economic contribution, the applicant states that the development will provide skills and training (areas of training include food cultivation, woodland management, buildings construction, waste management, water supply, fuel production, renewable technologies, and animal management). This will in turn lead to increased employment, self confidence and self worth, and volunteers, trainees and educational visitors will benefit from healthy activity in a beautiful environment increasing personal health and well being. The development will also produce local, organic produce and seeds, contributing to the local economy and work with existing businesses and run Welsh language courses for learners and existing speakers. The applicant has included a Community Impact Assessment with his application.

**5.17** There is little evidence within the application to suggest that there is either a need or a demand for such training on sustainable living. Two projects within Pembrokeshire have also already been granted permission for projects which include training in relation to LID and sustainability (Lammas and Mount Pleasant, Cosheston) and there is some doubt as to the level of interest that a further project would generate. Whilst one letter has been provided by the Youth Offending Team Officer, this gives no commitment to the project due to the budgetary reductions within the public sector. Furthermore, whilst there are three letters in relation to the seed/fruit/vegetable growing, these are supportive but do not provide any commitment to the enterprise and raise some issues with regard to crop failure, standards and problems with cross-pollination and crop rotation and their commitment to the project are dependent on the site's success. It is also evident that there are other local suppliers within the area already providing a local, organic fruit and vegetable service. It is also unclear what level of employment is likely to be generated (inevitably there will be some during the construction phase but longer term employment is not evident and the

application forms state that there will be no new employees) and the use of volunteers is likely to decrease any employment opportunities.

**5.18** The criterion clearly requires wider public benefits to be demonstrated rather than simply benefits to the occupier. It is unclear from the evidence provided that this will be the case in respect of socio/economic benefit.

**5.19** With regard to the other training opportunities that this site could offer, a number of these could be provided elsewhere (ie not necessarily within a countryside location) and this is discussed further under criterion 5.

**5.20** The social and economic aspects of this development could also result in some negative results. The training/educational visits and farm shop will inevitably result in increased movements to and from the site, and due to the site's location a number of these are likely to be by private car. National Government seeks to minimize and reduce the use of the private car and LID should be an exemplar in this respect. Whilst a transport statement has been provided, in the absence of any strong direction within the application as to the likely numbers of visits and people, it is not possible to fully assess the negative impacts that could arise from this proposal. As such it is considered that there is uncertainty within the application as to the social and economic contribution that this proposal will make and as such, taking into account the comments on the environmental contribution it is not considered that this application meets criterion a of policy 47.

***b. All activities and structures on site have low impact in terms of environment and use of resources***

**5.21** The SPG in relation to this criterion requires LID to provide for their own water, sanitation and energy and not rely on mains resources, although where mains exist on site their use should be restricted and only used until the target of meeting resources on site is realised. Resource needs should be met on site by year 3 of the project. Buildings should be constructed from recycled, reusable materials with low embodied energy and from sustainable sources and should be reversible. Traffic generation should also be well below that generated from a similar development operated in a conventional way and the development should have a low impact in terms of the landscape.

**5.22** The application included a pre-assessment report in relation to the Code for Sustainable Homes which states that Level 5 of the Code will be achieved (Level 3 is the minimum requirement for a conventional dwelling) and full details of all building construction materials has been submitted. The Design and Access Statement states that the development will be a zero carbon one. In addition an Ecological Footprint Report was provided which states that in Year 1 the applicant's ecological footprint would be reduced to 2.36 global hectares (gha) per capita and by Year 5 to 1.90gha per capita.

**5.23** The applicant also provides information in relation to the proposed use of resources; water for cooking, food preparation and bathroom sink and

drinking will be either from the mains which runs close to the site or from a borehole, water to be used for washing machine, bath, shower, and agricultural activities will be from rainwater harvesting. Grey water from these activities will be passed through a reed bed system and returned to the ground or stream and sewerage will be dealt with by compost toilets. The house, education room and volunteer accommodation will be heated and electricity supplied by solar panels, and fuel for heating will be obtained from the coppicing/planted woodland from year 4 onwards. Water heat will be supplied from PV panels on the house whilst cooking fuel will use LPG initially with seasoned wood used in the long term. It is stated that the site will be connected to the mains so that excess energy can be sent to the grid when there is oversupply.

**5.24** With regard to the materials to be used for the development it is considered that these comply with the criterion in so much as they are from sustainable sources, re-useable and reversible in the main. Their intrinsic qualities have low embodied energy and are largely organic in nature enabling a relatively easy reversibility. However, the overall performance of the buildings is less compliant, particularly in relation to their fuel and energy requirements. The application states that LPG will be used in the short term but no indication is given of the likely timeframe for the use of wood for fuel sufficient not to rely on LPG or whether that is the intention. It is highly questionable whether the proposed planting will produce sufficient fuel for the development within the required three years or even five years as required by TAN 6. Furthermore, there is little information in relation to the solar and PV panels and the amount of electricity and hot water that can be produced particularly in the winter months, and for a development of this size. The development is to be connected to mains water and to the electricity mains for supply to the grid. Whilst it is accepted that there is a mains water supply close by, and there is some argument that this could be more environmentally friendly than a borehole, no evidence has been provided to justify this case with specific regard to this site, and therefore it is not possible to compare these alternative water provisions. Furthermore, it is not clear how much of the site's needs can be met by the solar panels or how much will be from the grid. As such in the absence of such a justification, these elements are contradictory to the requirements of the policy 47 and combined with the other matters for consideration under criterion b) it is not considered that the proposal meets criterion b).

**5.25** Furthermore, the proposal will inevitably lead to increased traffic movements. The application includes a transport statement and travel plan providing estimations of the likely movements for the various activities on the site and the division of movements to and from the site. Whilst the plan suggests that much access to the site will be via cycle, foot, bus and horse, there is also a significant amount of access by the private car. Whilst it is accepted that the figures given for the household itself are lower than those for a "conventional" development, it is inconceivable that most of the business side of the proposals will be accessed by anything other than private vehicle by virtue of the site's location in the countryside. There is a bus route within several hundred metres but trips to a local farm shop are unlikely to be

undertaken via the bus and a walk to the site. It is more likely that this part of the business will be via use of the private car to a location that has not had such activity prior to this proposal being put forward. Furthermore, as stated under criteria a) there is no evidence with the application to quantify the likely interest in this site for educational purposes and it is very difficult therefore to measure the likely vehicular and other movements to and from the site. It is considered however that the probability is strongly in favour of the private car rather than other transport modes and these in turn will be reliant on fossil fuels, increasing carbon output.

**5.26** In addition to the above criterion, it is not considered that the proposal will be well integrated into the landscape as set out in criterion d) below, and as such the combined effect of the shortfalls in the proposal as outlined result in a non-compliance with criterion b).

**5.27** The application was also accompanied by an Ecological Footprint Analysis. External consultants were asked to comment on the report and whether its findings met policy 47 as far as it is relevant to ecological footprinting. Policy 47 does not directly include ecological footprinting but an assessment of footprint is relevant to criterion b) as the use of resources is part of the assessment in footprint analysis. The report concluded that the analysis does meet policy 47 in this respect. However, as set out above, it is considered that the application fails to meet the criterion b) in other respects.

***c. Opportunities to reuse buildings which are available in the proposal's area of operation have been investigated and shown to be impracticable.***

**5.28** The site has been previously undeveloped and as such there are no buildings within the proposal's area of operation that could be re-used. As such the proposal complies with this criterion.

***d. The development is well integrated into the landscape and does not have adverse visual effects***

**5.29** As set out in the Current Application section of this report, the main built form of the development is to be located in the south east corner of the site with the farm shop, car parking and solar panels located to the south west of the site and the polytunnel to the north east. The vegetable garden will be located to the immediate north of the house and buildings. The amended plans do not specifically identify the area for the seed planting which as set out above is a central part of the business element of the application. Furthermore, the plans, whilst scaled, are limited in detail and lack survey and finished levels, details in respect of ground mounted solar panels and their height, and the full detail of the PV panels, and as such the full impact is difficult to assess and this vagueness introduces uncertainty. Nonetheless, a landscape appraisal has been undertaken with regard to the Authority's Landscape Character Assessment SPG which in turn draws down information collected as part of the LANDMAP assessment of landscape character.

**5.30** It must be accepted that LID policy directs such developments to countryside locations, and thus there will be some impact on the local rural character. Notwithstanding this, criterion d) of policy 47 requires development to fit into its landscape setting, and not have adverse impact on views particularly from public routes and viewpoints and neighbouring properties. The whole development should also be taken into account including impacts arising from materials storage, parking, ancillary structures such as polytunnels and from the change of use of the land itself where vegetable production etc is proposed.

**5.31** The overall impression will be of a developed hillside and the introduction of built form and intensive use where there is currently pastoral landscape. The site is exposed when viewed from the direction of Trefin, the coast path, local Public Rights of Way and nearby properties. This is due to the slope of the land, down to the north, and due to the lack of effective vegetation cover.

**5.32** The Landscape Character Assessment (LCA) Supplementary Planning Guidance LCA20 identifies this Landscape Character Area as:

*'gently undulating agricultural landscape of medium sized fields with a close visual relationship with the adjacent coast. The area is interspersed with regular scattered farmsteads and occasional hamlets and small villages'.*

The LCA SPG identifies the special qualities of this area. Those which are particularly relevant to this proposal are set out below:

*"There is a strong, long established settled character, arising from small scale settlements and scattered farmsteads within an undulating, predominantly pastoral farmland landscape. There is a very distinctive local vernacular architecture, stone built with slate /grouted roofs.*

*The field pattern is well defined and imparts a rich texture to the open landscape, where small areas of woodland and scrub serve as punctuation points. The importance of the traditional field boundary hedgebanks and dry stone walls cannot be over emphasised and the quality of their condition as a result of management practices is a defining element in the landscape".*

The nature of the development in relation to the surrounding landscape means that this form of development would be generally out of character and exposed. A large area of clustered development, below the skyline, would be incongruous and it is not considered that it will be in keeping with the character of the local area. There is limited effective existing screening for the development, and there is doubt whether the planting schemes will provide effective screening (given the exposed nature of the site and due to the slope of the land). As such the proposal will be out of character with the 'small scale settlements and scattered farmsteads within an undulating, predominantly pastoral farmland landscape' as defined in the LCA. The visual clutter and intensification of use introduced by the development would be at

distinct odds with the large scale open aspect of the landscape and would, at this exposed location be discordant with the intrinsic character of the area.

**5.33** This LANDMAP Visual and Sensory Aspect area is evaluated as High, [St Nicholas PMBRKVS024]. The LANDMAP information system indicates that one of the key qualities which should be preserved in this area is the 'sense of low intensity in some parts and coastal association'. It is considered that this area forms a strong relationship with the coastal edge and the extensive views to and from the coast. The landscape here is characterized by isolated single dwellings and clusters of tightly nucleated farm buildings in small complexes. The buildings, large vegetable planting area, parking area and polytunnel by both their presence and the scattered nature of the siting, would be inappropriate here and have an adverse visual and landscape character impact. It is unclear from the information provided, whether the screening indicated for 10 years time would either succeed (due to the sites location and exposure), or be sufficient to be in keeping with the character of the area, i.e. represent an area of woodland and scrub, which currently act as punctuation points, or whether the development would remain visually prominent.

**5.34** This proposal would therefore introduce discordant elements into the landscape, eroding its pastoral character. The proposal is exposed through the slope of the site, and cannot be mitigated from the extensive views within the landscape character area, because there is much doubt as to whether the development could be effectively screened over time. The fields form part of a wider expanse of rectangular pastoral landscape, with low hedge boundaries, interspersed with areas of wood and scrub. It is therefore not considered that this proposal complies with criterion d) of policy 47.

***e. The proposal requires a countryside location and is tied directly to the land on which it is located, and involves agriculture, forestry or horticulture***

**5.35** The main enterprise relating to this proposal is the growing of seeds, fruit and vegetables for sale to local businesses and from the gate. This is clearly a horticultural enterprise that requires a countryside location and therefore the principal business activity for this LID complies with this criterion.

**5.36** The proposal also includes a secondary element of training and education, much of which is based on the demonstration of the practices and techniques used in the horticultural activities. As such these also are required to be located in the countryside. The more subsidiary elements, however, such as the Welsh classes, furniture making and weaving are not considered to be reliant on a countryside location and could be undertaken elsewhere. On balance however, the main business activity requires a countryside location and as such criterion e is met.

***f. The proposal would provide sufficient livelihood for and substantially meet the needs of residents on the site***

**5.37** Criterion f) of Policy 47 requires 75% of the basic household needs of the residents on site to be met by means of activities centred around the use of resources grown, reared or occurring naturally on the site. This requirement should be met by Year 3 of the project or if not, be explained in the application.

**5.38** The applicant has provided information in relation to his annual household needs and his household data with scenarios for 2011/12 and 2015/16 given against a benchmark of 2009/10. He has also provided data in relation to his expenditure and income for the various parts of the enterprise. He states that the business will be financed from savings.

**5.39** It is noted that a number of the objections received raise the issues of the unrealistic nature of the financial data provided with the application and that an independent consultant should be employed to assess the figures provided. The principle of LID does not however, necessarily follow conventional business costings, and this type of project is unlikely to generate significant levels of income, nor have expenditure that would be similar to a "conventional" type of living. The SPG accepts that the financial aspects of LID are often based on a subsistence based approach with a very low income. It is however necessary for projects to demonstrate that occupants can derive a livelihood from a full time presence on a site which is financially secure.

**5.40** Whilst no independent view has therefore been sought on the financial information in the application as it would not (nor should) follow a conventional business model, there are certain costs which are common to all developments such as council tax and where comparative data can be used. The application includes a figure of £500p.a for council tax and £300 for insurance which are considered to be low for a three bedroom house and associated farm shop and outbuildings.

**5.41** Furthermore the footprint analysis consultants have taken into account the likely self sufficiency of the site in assessing the footprint of the project. In this respect the advice received is that the estimated food reductions for the scenarios presented and the associated reduction over time of the footprint are "implausible". As such the data provided in relation to the projected reliance on home grown foods is not considered to be sound and calls to question the overall conclusions in relation to the amount of household needs that can be met by the site. In addition, as set out in the analysis of criterion b) it is evident that electricity and water will be provided from means outside the site and the quantities that the site itself will provide are unclear.

**5.42** The applicant has also indicated that the set up costs for the business are to be met from savings. It is unclear whether the "business" includes the construction costs for the house and other buildings. It is also stated that funding will be sought for the woodland planting through the GLASTIR scheme and through other grant schemes for the educational aspects of the project. Whilst there is no objection to grant aid being given to this project in the same way as any other business may apply for grants, *this cannot form*

*part of the essential financing of the scheme”* where there is no guarantee of long term security for that funding. The scheme must be able to demonstrate how it will provide for the sufficient livelihood of the residents of site without any external funding. In this application, no information has been provided as to how the enterprise would be funded in the absence of these funds, nor how the construction will be financed. Again, this introduces doubt into the conclusions of the financial information.

**5.43** There is also doubt regarding the likelihood of the site to produce the foods that have been listed in the application of for sufficient fuel to be provided by the woodland. The applicant has provided information in relation to the climate, hydrology, geology and soils on the site, but the highly exposed nature of the site so close to the coast calls to question the likely success of the proposed woodland and food planting, in particular soft fruits such as strawberries and raspberries. The production of these foods, if possible on this site, would seem to be likely to be reliant on further inside growing or protection which is not included in the application and which would have implications for other criteria in policy 47 (ie visual impact). As stated in criterion a) a number of possible problems with crop failure and site success have been raised by potential purchasers of the seed crop and the contingencies for these failures have not been addressed in the data provided. Furthermore, the likely supply of timber for fuel from the woodland within 3 years (or 4 as stated) is in doubt due to the site's conditions and respective growing time.

**5.44** It is therefore considered that the financial information provided raises doubt as to its accuracy and the site's conditions and position provide considerable doubt on the amount of food and fuel that can be produced on site. In conclusion, the likelihood of the site being able to meet 75% of the basic needs by Year 3 is inconclusive and unlikely. As such the application fails to meet criterion f.

***g. The number of adult residents should be directly related to the functional requirements of the enterprise***

**5.45** The application is proposed to sustain two adult residents on the site and information has been provided in relation to the division of the functional requirements of the enterprise between the two adults concerned. It is considered that the number of adults is directly related to the functional requirements of the proposal and criterion g is therefore met.

***h. In the event of the development involving members of more than one family, the proposal will be managed and controlled by a trust, co-operative or other similar mechanism in which the occupiers have an interest***

**5.46** This criterion is not applicable as the development only involves one family.



## **6.0 Other Policies**

**6.1** As set out above, it is not considered that the proposal meets criteria a, b, d, or f of Policy 47. The policy requires all criteria to be met. In the absence of compliance with this policy, consideration needs to be given to whether the proposal meets other policies within the adopted Development Plan.

**6.2** In this respect, Policy 7 in relation to the Countryside will only allow development outside identified centres where it meets one of eight specified circumstances, one of which is for LID. It has been concluded that the proposal fails to meet this criteria. The other criteria do, amongst other things, allow housing for essential farming needs. In this case, no justification has been put forward that this proposal is essential for housing a farm worker and it also fails to meet any of the other exceptions set out in this policy for development in the countryside.

**6.3** Furthermore, policies 1, 8 and 15 relate to the National Park's purposes and duty, its special qualities, and its conservation. Policy 29 requires an integrated approach to design to be taken with regard, amongst other things to local place and distinctiveness. It is considered that this development, by virtue of the issues raised under criterion d) of Policy 47 fails to be compatible with the conservation or enhancement of the natural beauty, wildlife and cultural heritage of the Park, nor to provide opportunities for public understanding and enjoyment of those qualities that would override the first purpose. The development would also fail to protect the special qualities of the National Park as required by Policy 8 as it would be an incongruous development in an exposed location to the detriment of the character of the area. It would cause visual intrusion and be insensitively and unsympathetically sited within the landscape, introduce a use and design of built form which is incompatible with its location and fail to harmonise with or enhance the landform and landscape character of the National Park as required by Policy 15. The development would therefore fail to meet the more general policies within the National Park relating to its overall protection.

## **7.0 Other Material Considerations**

**7.1** As set out in the Policy Section of this report, TAN 6 forms a material consideration in determining this proposal. TAN 6 refers to LID as One Planet Developments but for ease of this report the LID definition is used.

**7.2** TAN 6 requires LID to meet the government's objective of reducing our ecological footprint to the global average availability of resources – this being 1.88 global hectares per person in 2003. LID in the national context is development that through its low impact either enhances or does not significantly diminish environmental quality and should be an exemplar of sustainable development.

**7.3** TAN 6 includes specific requirements; in particular a requirement for LID to initially reach an ecological footprint of 2.4 global hectares or less per person and demonstrate clear potential to move towards 1.88 global hectares

over time. Developments should also be zero carbon in construction and use. In this respect, the consultants commissioned to consider the Ecological Footprint Analysis concluded that the data assumptions employed for the scenarios for reduction in ecological footprint of food consumed by the occupants was implausible and as such underestimates the final Ecological Footprint. Furthermore, the application does not enumerate how a zero carbon development will be achieved and it is therefore not possible to determine that the development will be zero carbon as required by TAN 6. As such the proposal does not meet the TAN 6 requirements in these respects.

**7.4** Applications for LID in the context of TAN 6 should also demonstrate the need to live on site and quantify how the inhabitant's requirements in terms of income, food, energy and waste assimilation can be obtained directly from the site. The activities should be able to support the minimum needs of the occupants in no more than 5 years. A baseline assessment of biodiversity and landscape character should be undertaken and a management plan be provided to enhance features of importance. The potential impacts (positive and negative) on the community should be provided including mitigation and a travel plan should be provided showing how zero carbon modes of transport and minimization of the use of the private car will be achieved.

**7.5** As set out in the analysis section above, it is accepted that the development requires a countryside location and by its very nature would require an on site presence. In addition, the development will provide some (limited) environmental benefits and will utilise sustainable and low impact materials for the building construction. However, it is not considered that the occupants will be able to meet their minimum needs from the development, by Year 5 (or soon after) for the reasons set out under criterion f) and the traffic figures given are not supported by sufficient evidence for confirmation. It is therefore considered that the development fails to meet a number of the requirements of TAN 6.

**7.6** Notwithstanding the above, it is not considered that even in the event of compliance with TAN 6 that this would be sufficient to overcome the concerns with regard to this development and its associated impact on the landscape character and visual amenities of the National Park. The National Park Authority has a duty under the Environment Act to conserve and enhance the natural beauty, wildlife and cultural heritage of the Park and to promote public understanding and enjoyment of those qualities. It also should pay regard to the need to foster the economic and social well-being of the local communities within the Park providing this is compatible with its purposes. In the event of conflict between purposes, conservation must prevail.

**7.7** The Welsh Government has developed national policy to allow for LID in the Welsh context, but due to the special character and landscape quality of the National Park, Policy 47 has been developed to respond to local circumstances in this context. On this particular site it is considered that the duty to conserve and enhance the National Park's natural beauty and cultural heritage is compelling and as such it is not considered that there are other

material considerations that would justify approving this development contrary to the policies of the adopted Development Plan.

## **8.0 Other Matters**

**8.1** No objection has been given to the proposal by the statutory consultees with conditional consent being recommended by the Highways department and Environment Agency. CCW raised queries in relation to the wind turbine but this no longer forms part of the application and no other objection was raised and Welsh Water also had no objection.

**8.2** As set out in the Public Response section of this report numerous objections have been received to this proposal. Many raised issues with the principle of this development, whilst other queried matters of detail. This report has attempted to address the main issues raised by third parties in its content. It should be noted, however that matters in relation to the use of youth offenders as volunteers, the need for CRB checks and competition between existing businesses and that proposed are not material planning issues and fall outside the remit of the consideration of this application. Issues relating to possible “permission creep” and precedent are also not relevant to the consideration of this proposal; each application should be dealt with on its merits and with regard to the policies in place at that time. Contact with the public and press by the applicant is also at the applicant’s discretion and is not a matter for this Authority. The issue raised regarding the quality of the plans is however, of materiality to this application and it is agreed that the quality and detail of the plans was poor and limited. The plans were sufficient to validate the application as they were scaled drawings, but in view of the limitations of the plans, the full assessment of the impact of this proposal in the landscape has been difficult. It should be noted, however, that this matter forms one of the reasons for refusal.

## **8.0 Conclusion**

**8.1** In conclusion, therefore the Town and Country Planning Act, as amended, requires local authorities to make decisions in accordance with the Development Plan unless other material considerations indicate otherwise. In this case, the proposal is not considered to meet the adopted Local Development Plan policies in respect of either LID or the more generic policies in relation to the protection of the special qualities of the National Park. Furthermore, it is not considered that there are any other material reasons, including taking regard of national guidance, that would indicate that this development should be granted contrary to the adopted Development Plan. The statutory purpose of the National Park Authority to conserve and enhance the National Park’s natural beauty and cultural heritage is compelling in this case; it is not considered that this development would constitute a form of LID that would provide a positive contribution and would adversely affect the character and appearance of the area. As such the application is recommended for refusal.

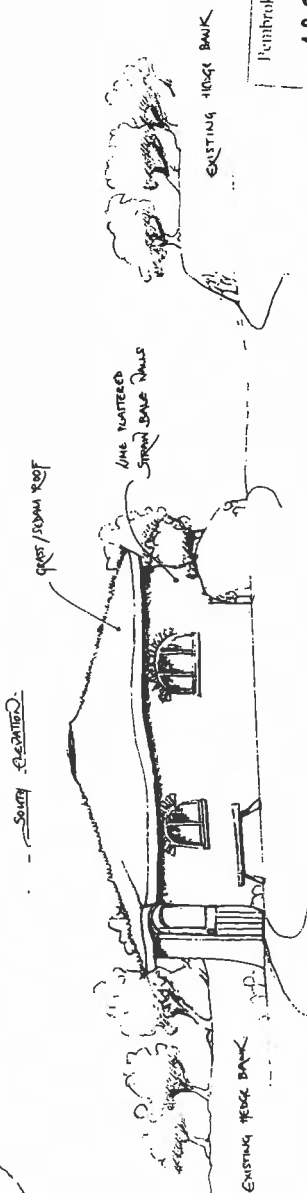
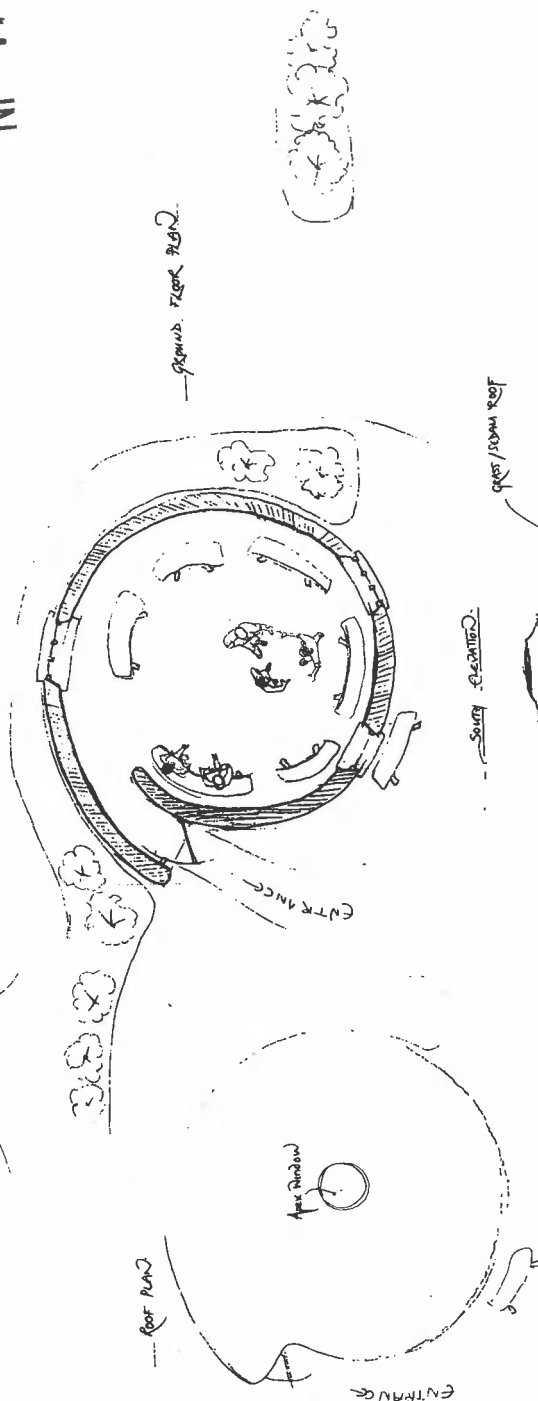
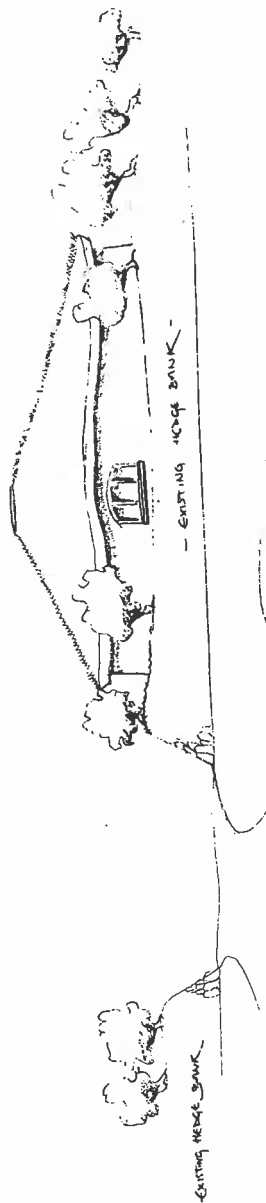
**Recommendation**

That the application be refused for the following reasons:

1. It has not been adequately demonstrated that this proposal is a low impact development as defined by Policy 47 of the Pembrokeshire Coast National Park Local Development Plan, in particular criteria a, b, d and f.
2. With due regard to Reason 1, the proposal if permitted would therefore result in the creation of a new residential dwelling/educational resource in the countryside without justification and as such would be contrary to Policy 7 of the Pembrokeshire Coast National Park Local Development Plan which seeks to resist development in such locations except in exceptional circumstances
3. The proposed development by virtue of its position, scale and design would have a detrimental impact on the special landscape character of the Pembrokeshire Coast National Park, and which the National Park Authority has a statutory duty to conserve and enhance. As such the proposal would fail to meet policies 1 (criterion a), 8 (criterion c) 15 (criteria a, b, c and d) and 29 (criterion a) of the Pembrokeshire Coast National Park Local Development Plan.
4. The application does not provide sufficient information to fully assess the development in respect of its full impact on the landscape character and visual appearance of the area.

20 July 2011

NP 11 3 9



**Leimbroskeshire Const**

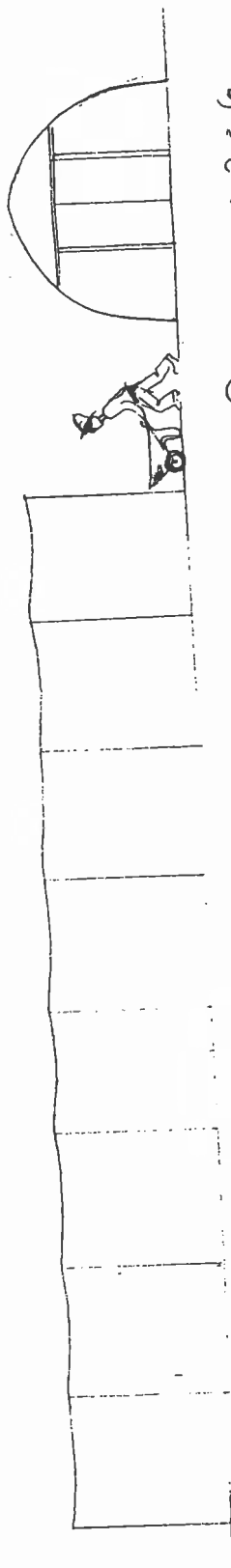
12 OCT 2011

Addressed to the Editor of the

**Pembrokeshire Coast**

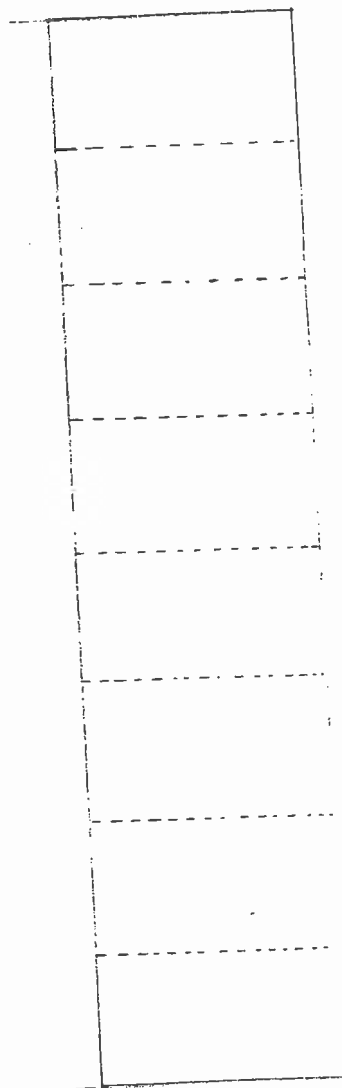
12 OCT 2011

13 OCT 2011

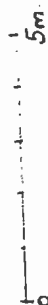


NORTH + SOUTH ELEVATIONS.

EAST + WEST ELEVATIONS.



GROUND FLOOR PLAN

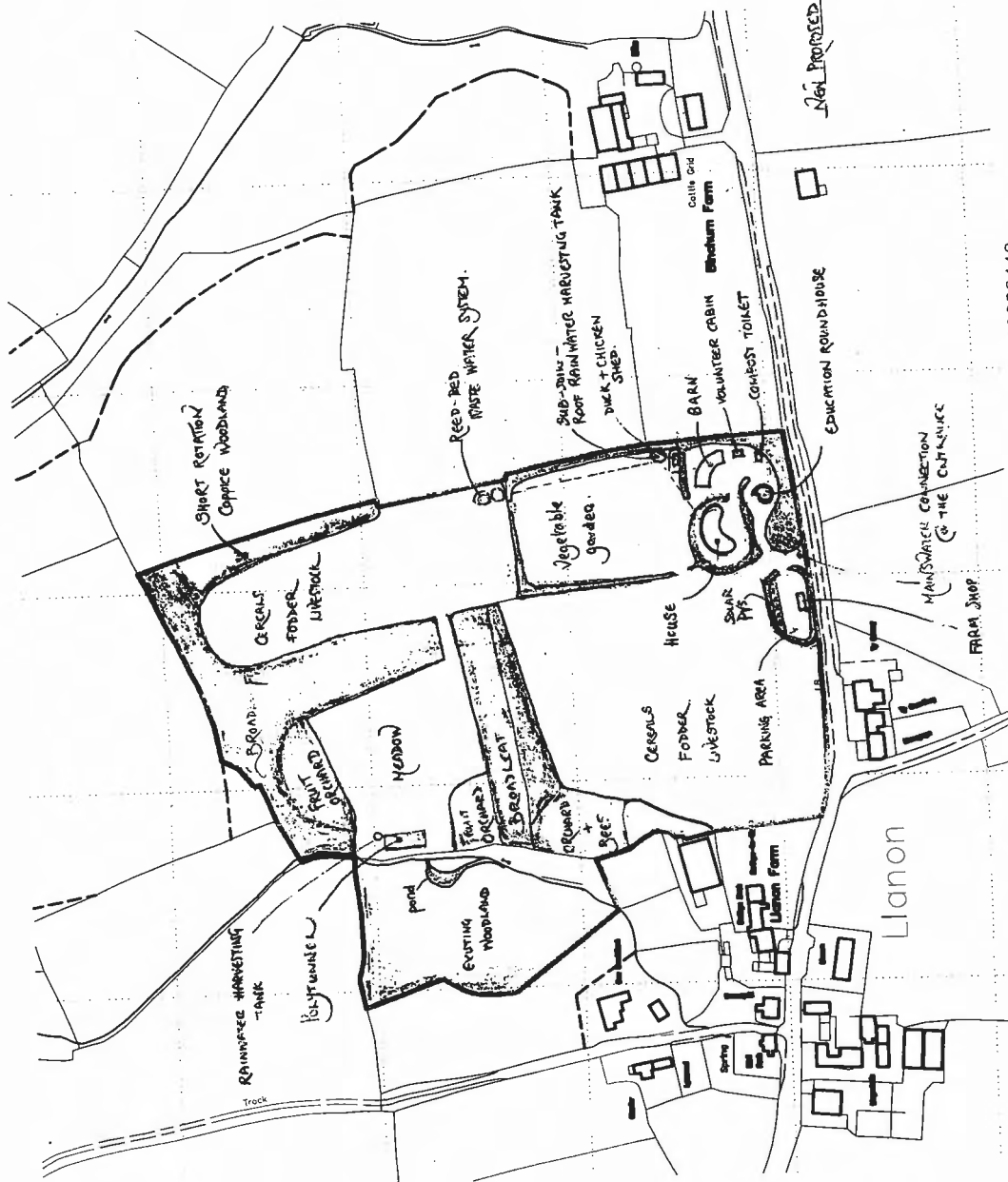


PROPOSED POLYTUNNEL FOR ORGANIC GARDEN  
@ LANDS OF BANGCHURN PARK

LIANON, TREFIN

13 August 2011.

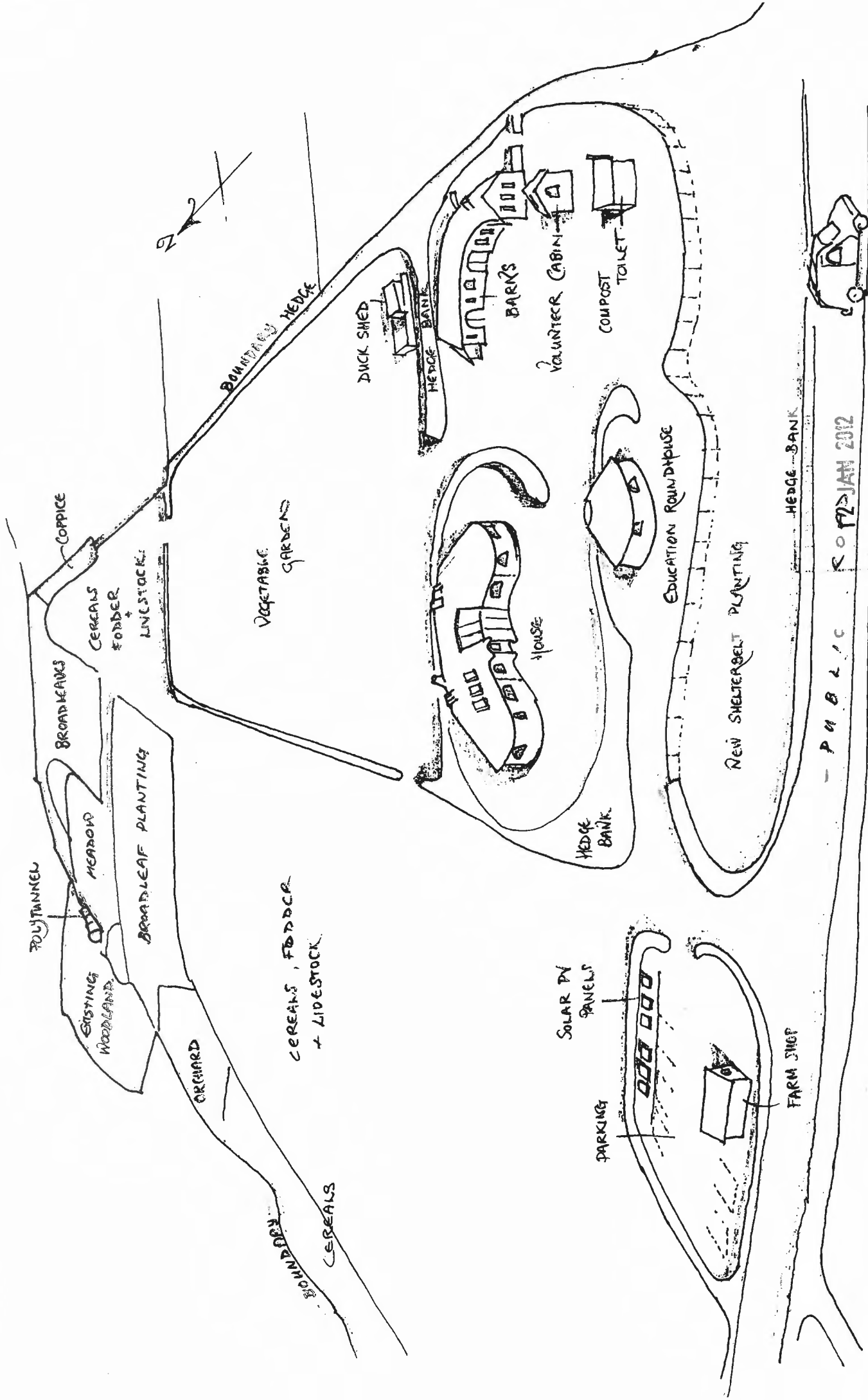
SCALE 1:125 1:100



Proposed Layout @ Llanon at Bridham Farm  
 Llanon, TREFIN  
 6th January 2018

Ordnance Survey (c) Crown Copyright 2011. All rights reserved. Licence number 100020449

1:2500 @ A3

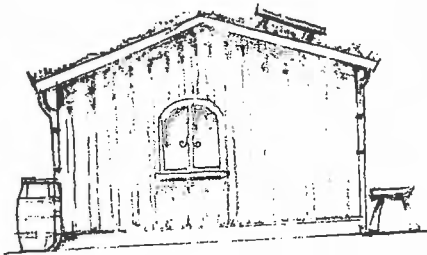


- PUBLIC - 072 JAN 2012

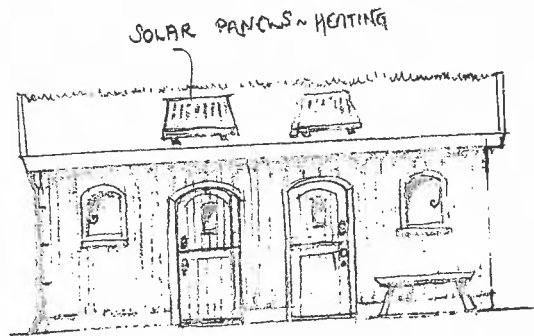
Fig 1. FARM LAYOUT WITH LANDSCAPING. PROJECTED YEAR 1.  
New Build @ Llanon Trefin. 6 Jan 2012



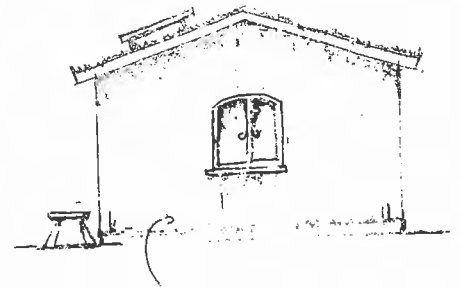
NORTH ELEVATION



WEST ELEVATION



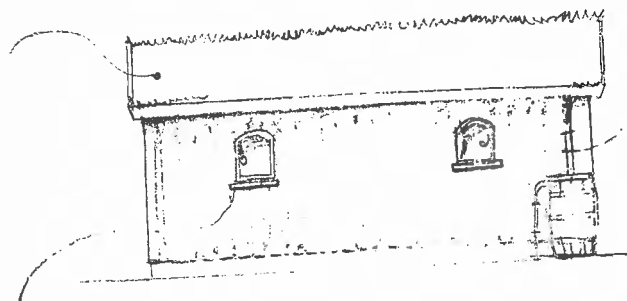
SOUTH ELEVATION



locally sourced ~ vertical cedar/larch cladding

EAST ELEVATION

SEDUM / GRASS ROOF  
@ 20° pitch

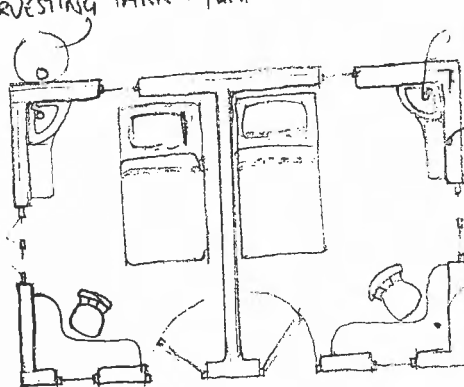


All external joinery of locally sourced  
and sustainably managed timber

GROUND FLOOR PLAN

RAINWATER HARVESTING TANK + PUMP

Total footprint 24m<sup>2</sup>



Washbasin

sheepwool/thermaflex  
insulated timber-framed  
construction

desk + cpl.



VOLUNTEER SUMMER - ACCOMMODATION CABIN

New Build @ Glanor, Trelin

Scale 1:100

6<sup>th</sup> January 2012.

12 JAN 2012

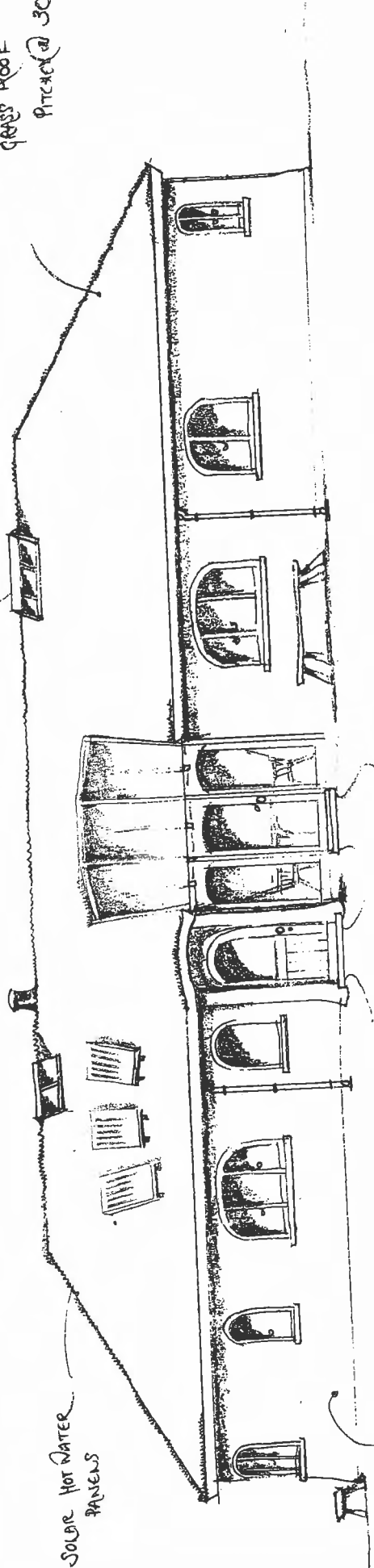
12 JAN 2012

ALL EXTERIOR JOINERY OF  
SUSTAINABLY MANAGED, LOCALLY SOURCED  
LARCH, CEDAR AND OAK

SOLAR HOT WATER  
PANELS

RIDGE LIGHTS ABOVE BEDROOMS 1+2

GRASS ROOF  
Pitched @ 30°



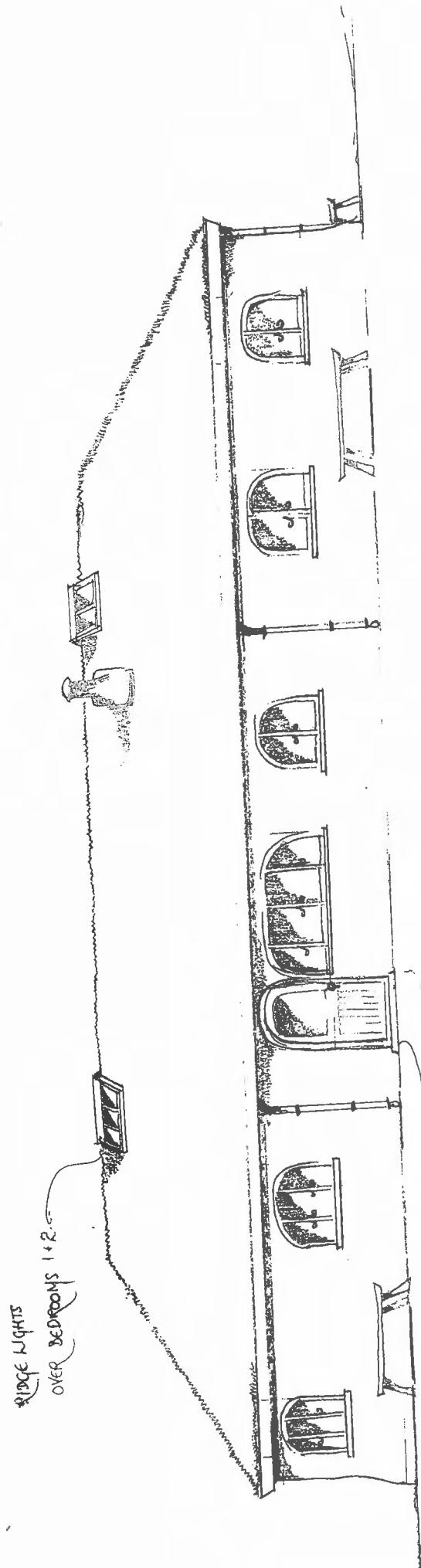
LIME PLASTERED  
WALLS OVER A TIMBER FRAME + STRAW BALE  
SUBFRAME CONSTRUCTION

SOUTH ELEVATION

New Build @ Lanon, Trefin

Scale 1:100

5<sup>th</sup> January 2012



RIDGE LIGHTS  
OVER BEDROOMS 1+2

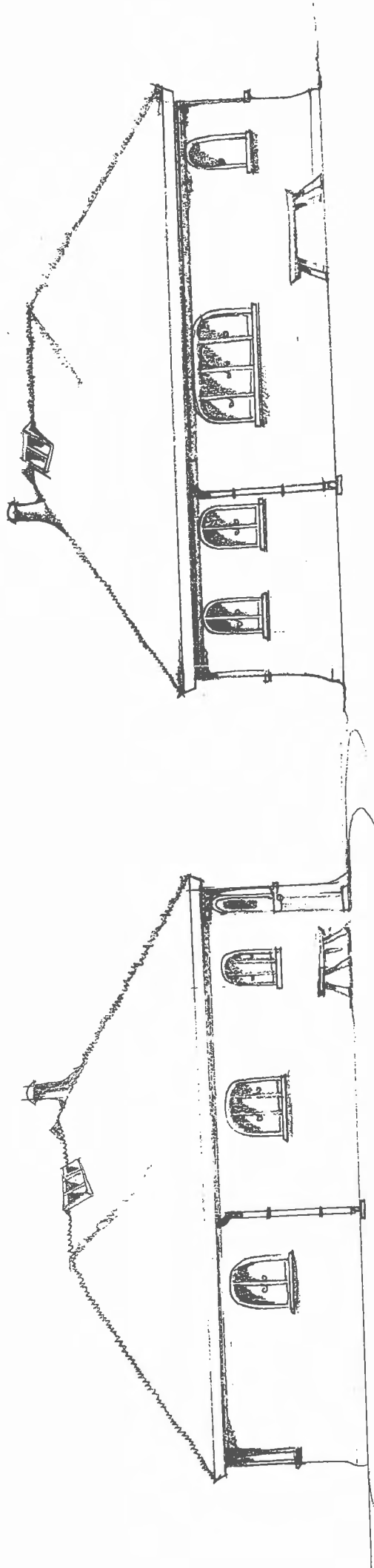
NORTH ELEVATION

New Build @ Llanon, Trefin.

Scale 1:100

5<sup>th</sup> January 2012

12 JAN 2012



WEST ELEVATION

EAST ELEVATION

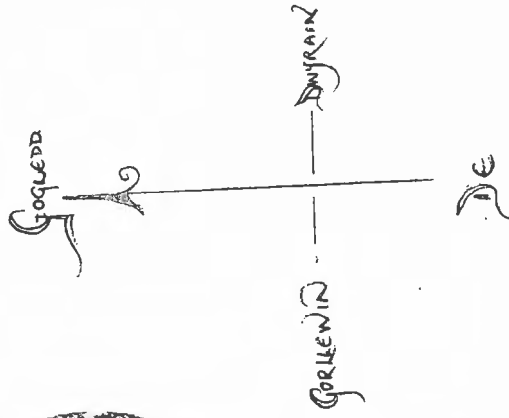
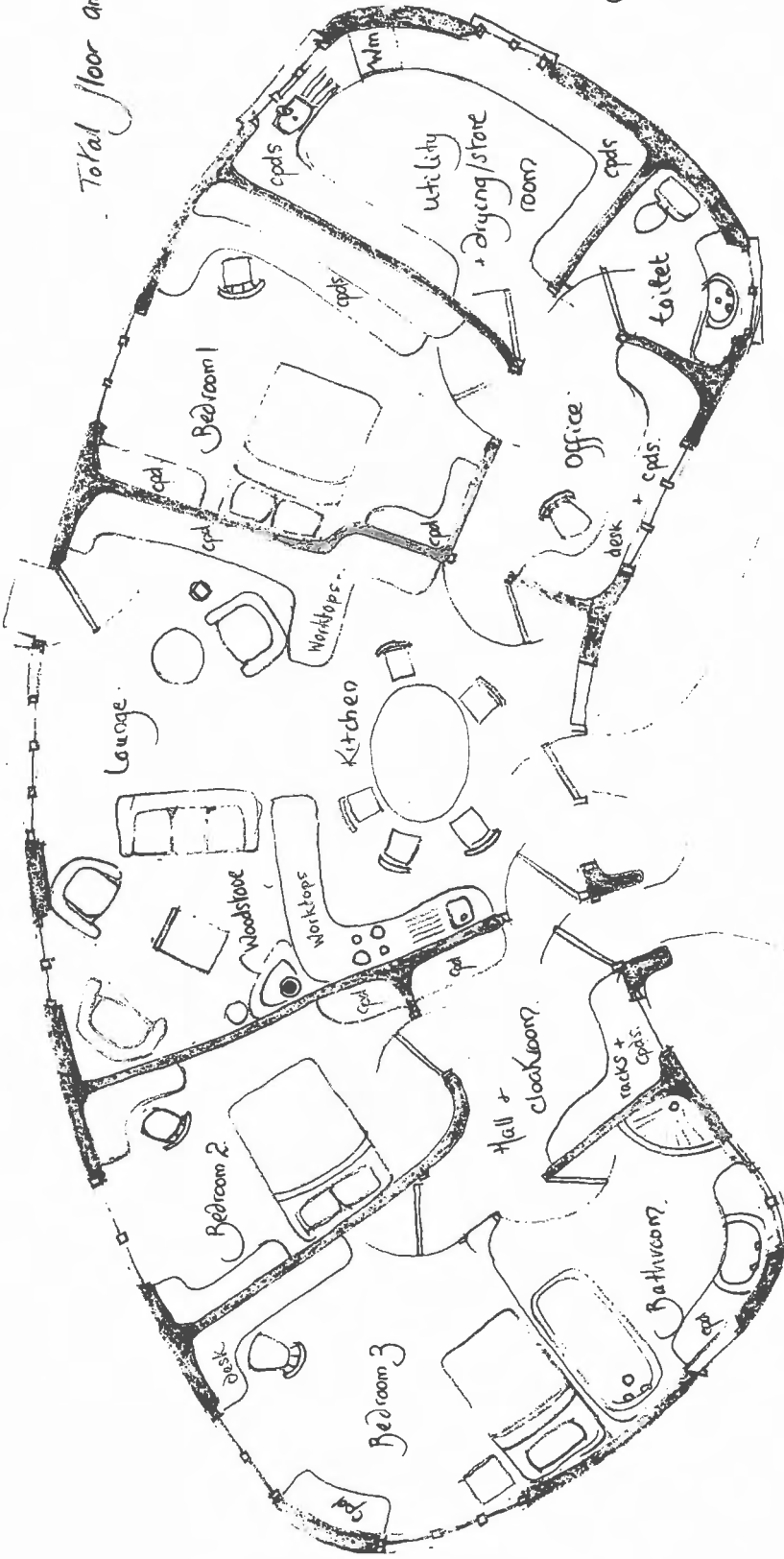
New Build @ Lanon, Trefine

Scale 1:100

5<sup>th</sup> January 2012

12 JAN 2012

Total floor area 160m<sup>2</sup>.

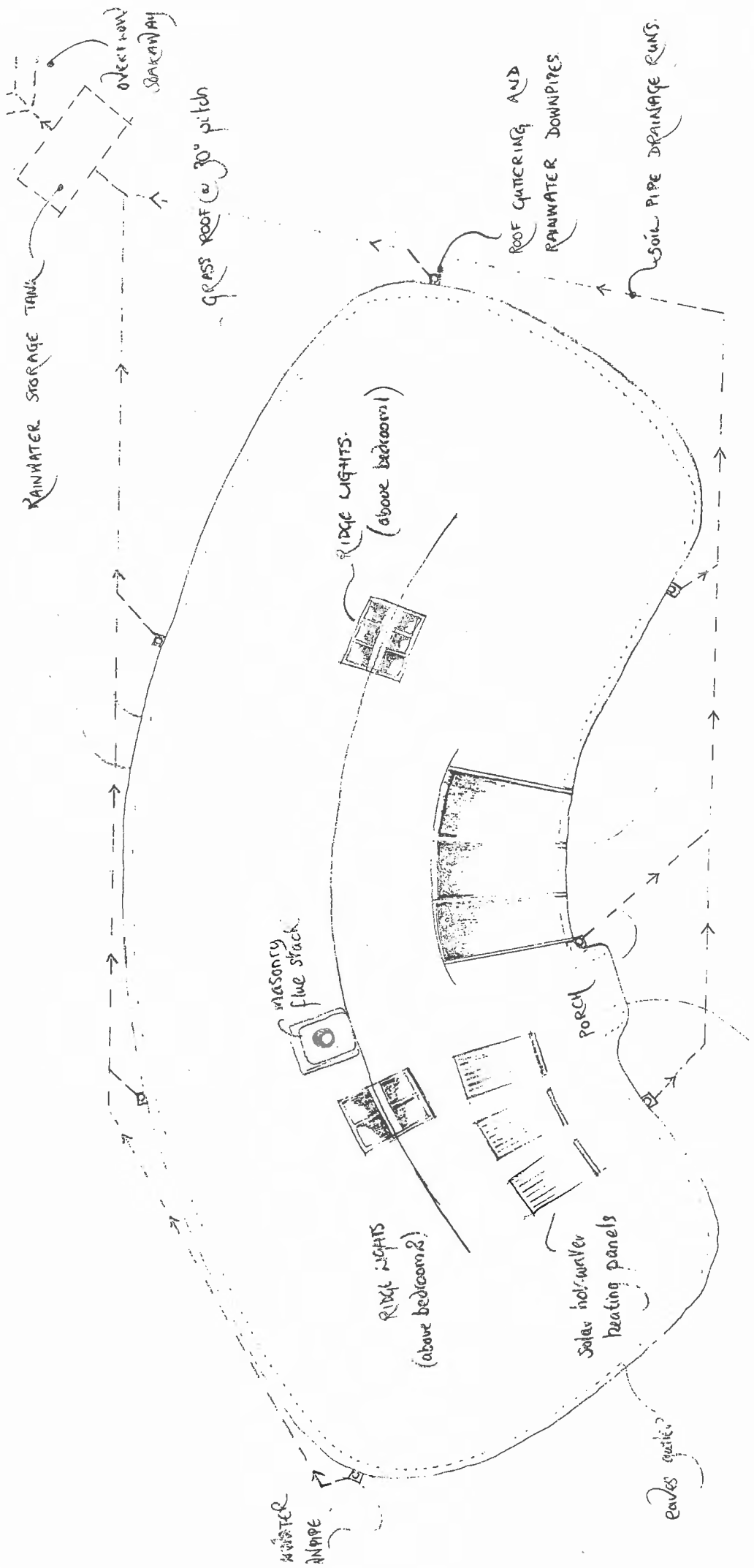


— ground floor plan

New Build @ Hanon, Treja

Scale 1:100

4<sup>th</sup> January 2018



12 JAN 2012

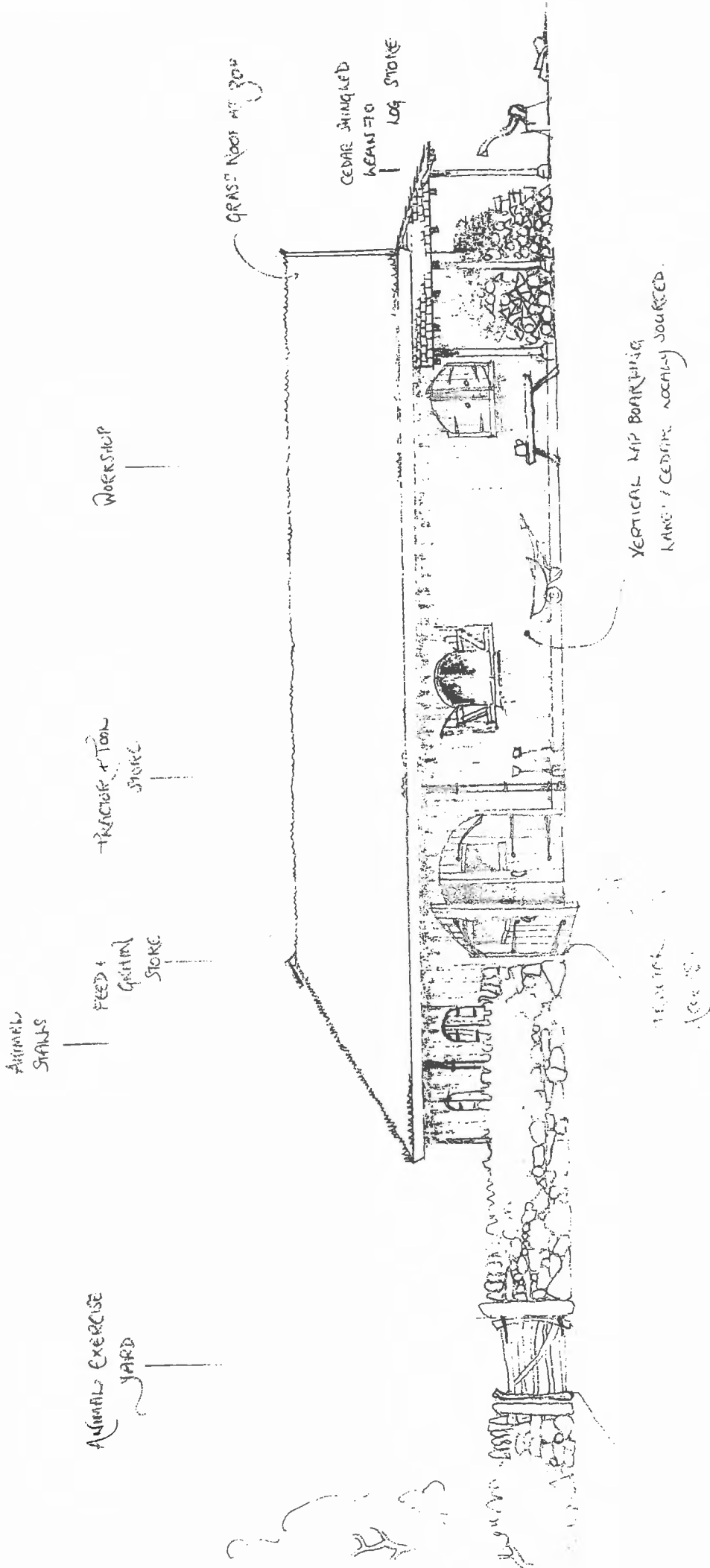
New Build @ Lanon, Trefn

Scale 1:100

5<sup>th</sup> January 2012

ROOF PLAN AND RAINWATER

DRAINAGE RUNS



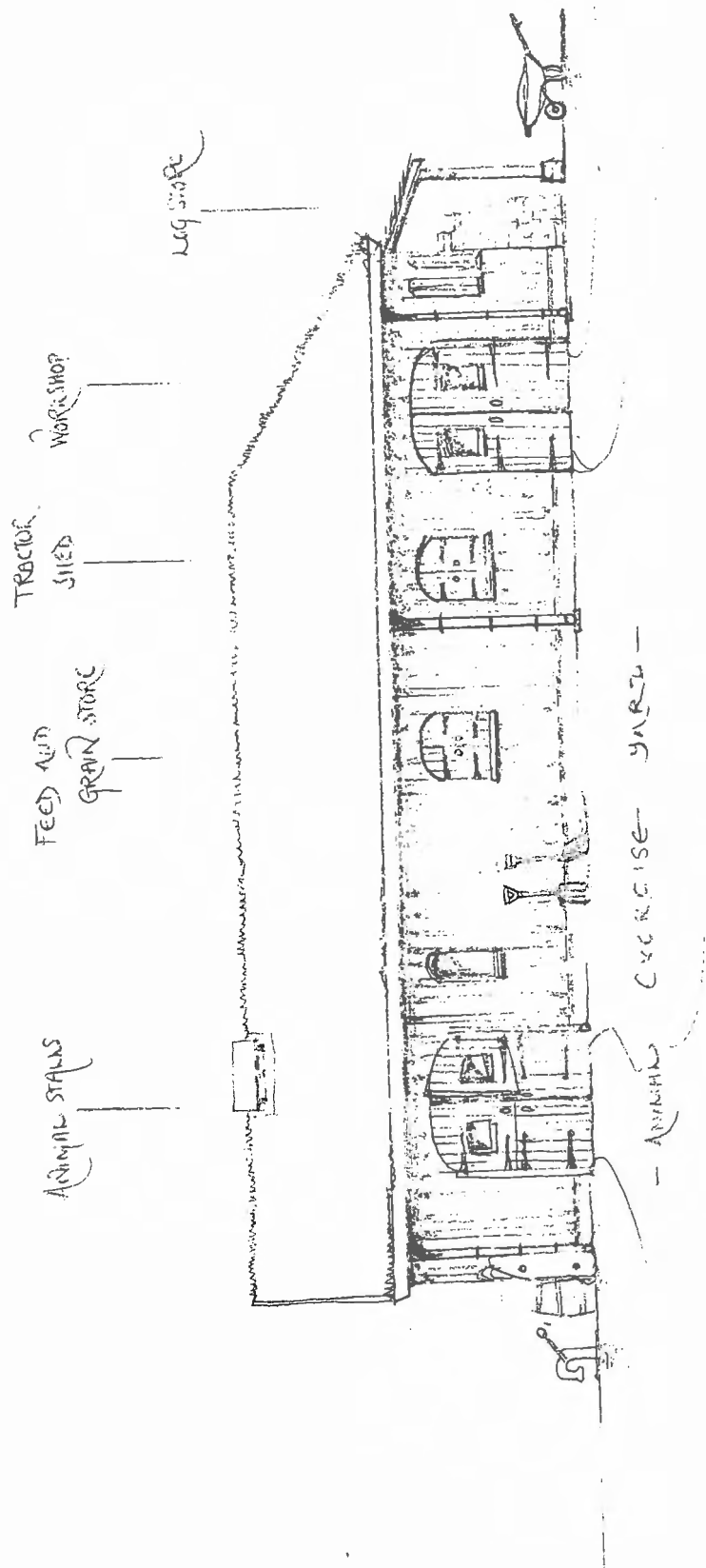
NORTH ELEVATION - BARN

New build @ Lanon, Tex

Scale 1:100

Joe Conway 2012

12 JAN 2012



EAST ELEVATION - BARN

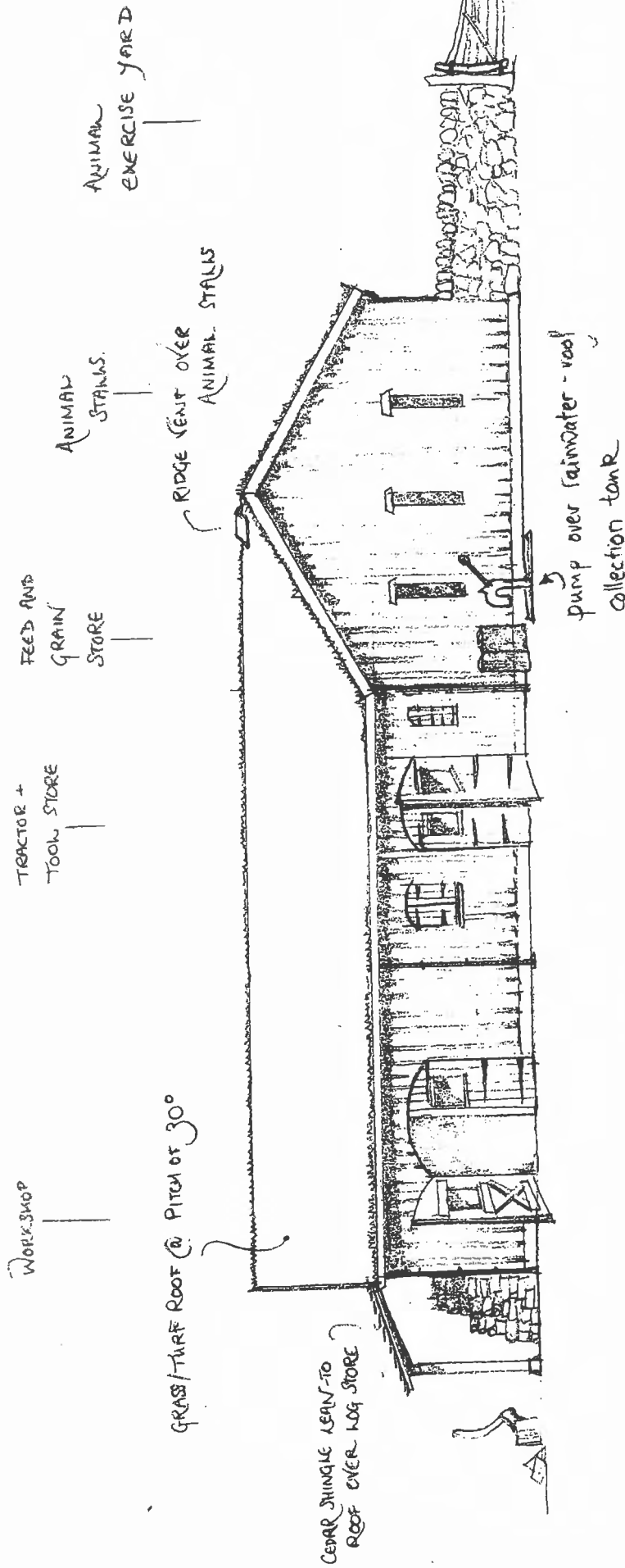
New Build @ Llanon, Trefen.

Scale 1:100

January 2012

12 JAN 2012

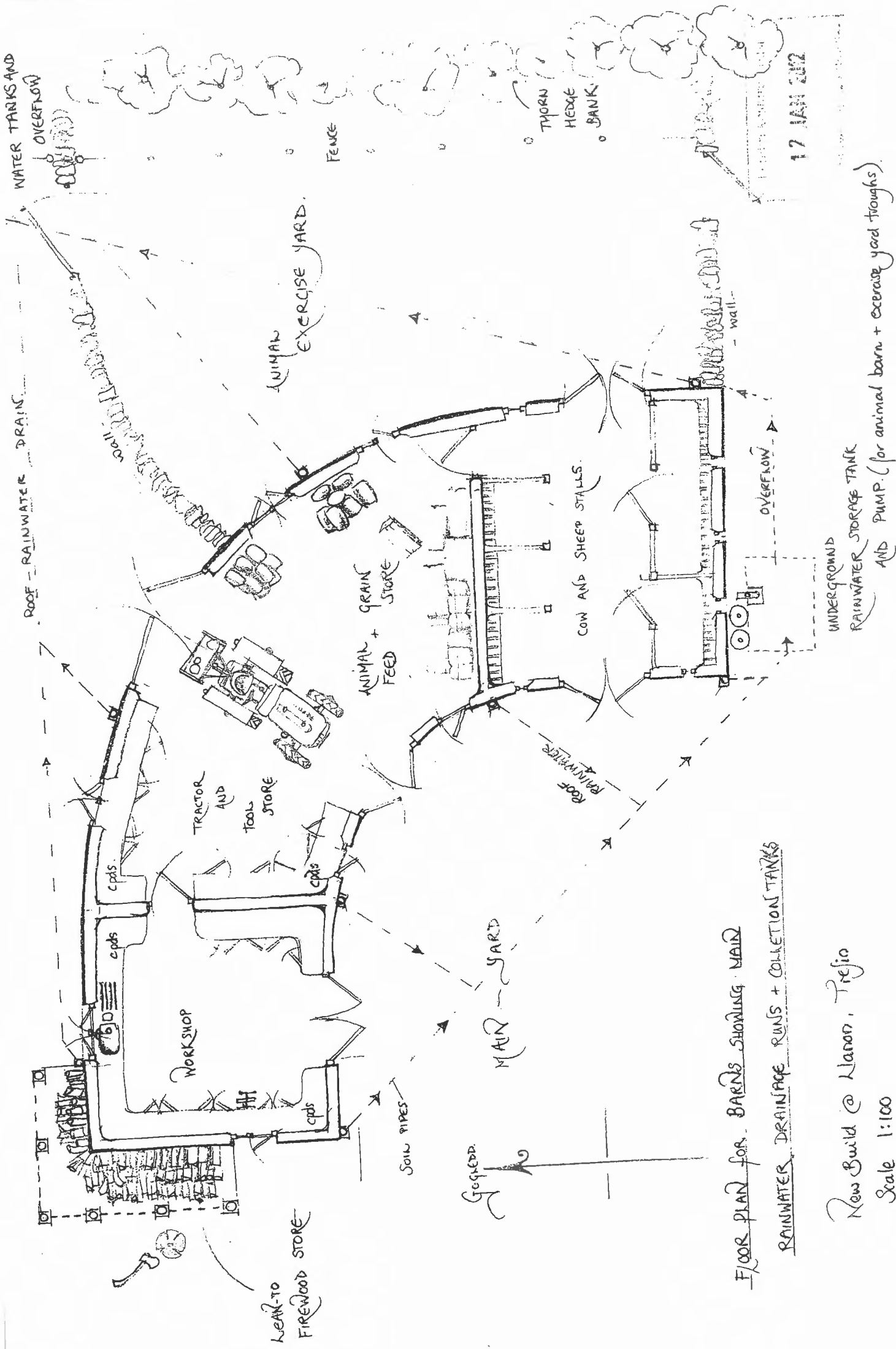




# SOUTH ELEVATION

BARN'S - VERTICAL CEDAR/LARCH CLADDING OVER  
LOCALLY SOURCED TIMBER POLE FRAME CONSTRUCTION.

New Build @ Llanon, Trefn 17 JAN 2012  
Scale 1:100  
5<sup>th</sup> January 2012.



17 JAN 2012

FLOOR PLAN FOR BARN SHOWING MAIN  
RAINWATER DRAINAGE RUNS + COLLECTION TANKS

New Build @ Maron, Trefio  
Scale 1:100  
5<sup>th</sup> January 2012