

**REPORT OF THE HEAD OF PARK DIRECTION**

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**SUBJECT:**

**RESPONSE TO THE DRAFT SUPPLEMENTARY PLANNING GUIDANCE TO THE PEMBROKESHIRE COAST NATIONAL PARK LOCAL DEVELOPMENT PLAN**

**Purpose of Report:** The purpose of this report is to advise Members of the response received on the above consultation and to ask Members to adopt the guidance for development management purposes subject to the Officer recommended changes.

**Background:** The following Supplementary Planning Guidance was approved for public consultation by the National Park Authority on 12<sup>th</sup> October 2011. The consultation began in November 2011 and closed on 2nd of March 2012.

1. Addendum to the Renewable Energy Supplementary Planning Guidance
2. Siting and Design of Farm Buildings

An estimated 1,800 letters were sent to various consultees. These included Agents, Architects, Town and Community Councils within the Park, Housing Associations, Estate Agents, Developers, Local Community Groups, local AM's and MP's, County Councillors, Utilities, Chambers of Trade, Environmental Groups, Government agencies, and other people who had expressed an interest.

Letters and CD copies of the consultation documents were provided to libraries within Pembrokeshire, St Clears and Cardigan. They were also available at the National Park centres in Newport, St David's and Tenby in this format. Paper copies of the documents were available to view at the National Park Offices in Llanion Park, Pembroke Dock.

The consultation was advertised via the Authority's web site and via a public notice within the Western Telegraph which appeared in the 30<sup>th</sup> November, 2011 edition along with a press release.

A total of 9 individuals and organisations responded. 55 individual comments were made.

**Main issues:** The main issues raised by the consultation are set out and responded to in Appendix A. Appendix B provides a detailed printout of the representations made and Officer recommended responses. Appendix C shows the resultant proposed changes to the draft Supplementary Planning Guidance (relevant pages only). Please note that responses to comments made on the Addendum to the Renewable Energy Supplementary Planning Guidance has resulted in changes being made to the main Renewable Energy Supplementary Planning Guidance adopted by the Authority in October 2011.

## **Recommendation**

- 1. That the following Supplementary Planning Guidance to the Pembrokeshire Coast National Park Local Development Plan be adopted for development management purposes subject to the amendments set out in Appendix A, B and C:
  - a. Addendum to the Renewable Energy Supplementary Planning Guidance**
  - b. Siting and Design of Farm Buildings****
- 2. That the Renewable Energy Supplementary Planning Guidance adopted in October 2011 be updated as set out in Appendix C.**

### Background Documents

Pembrokeshire Coast National Park Local Development Plan Adopted September 2010  
<http://www.pembrokeshirecoast.org.uk/default.asp?PID=178>

Draft Supplementary Planning Guidance:

- Addendum to the Renewable Energy Supplementary Planning Guidance
- Siting and Design of Farm Buildings

<http://www.pembrokeshirecoast.org.uk/default.asp?PID=188>

Adopted Supplementary Planning Guidance on Renewable Energy

<http://www.pembrokeshirecoast.org.uk/default.asp?PID=528>

Planning Policy Wales Edition 4 February 2011  
Responses to the Supplementary Planning Guidance consultation

*(For further information, please contact Martina Dunne on ext 4820)*

## Appendix A: Supplementary Planning Guidance Main Issues and Proposed Response

This report provides a summary of comments made and an Officer response.

### Addendum to the Renewable Energy Supplementary Planning Guidance

- 1.1 In summary there were several issues of details raised about the safe operation of the rail network, impacts on views from as well as to sensitive locations in the National Park and how reflectivity of panels is treated in the guidance.

#### **Officer Response:**

- 1.2 Amendments are proposed where needed to accommodate the concerns raised.

### Siting and Design of Farm Buildings Supplementary Planning Guidance

- 1.3 Over thirty issues were raised, covering matters of detailed wording and appropriate emphasis on individual design dimensions, with useful suggestions on improving the text. Encouragingly, there was wide recognition of the value of the guidance in helping to shape new development. As can be expected there was a mix of comments some asking for more stringent requirements and some asking for less restrictive requirements and guidelines.
- 1.4 Farming and community respondents expressed concern that the draft guidance did not fully recognise the importance and value of the farming industry and its operational needs, and that in some respects it would serve to discriminate against farming interests.

#### **Officer response:**

- 1.5 These concerns are considered in the detailed analysis of the consultation responses, and amendments are recommended to reassure all parties that the Authority takes its responsibilities towards the farming industry and community seriously as part of its overall responsibilities towards the national park and its special landscape qualities. This is reflected in our statutory purposes and duty where we are required to take forward park purposes to foster the economic and social well-being of local communities within the National Park. The comments made have been extremely useful and various improvements have been made to the document.

## Appendix B

### Representations received during consultation on SPG commenced in November 2011 and closed on 2nd of March 2012, with officer responses, grouped by SPG

#### Addendum to the Renewable Energy Supplementary Planning Guidance

##### 1633 Ms Andrea Winterton, Countryside Council for Wales (CCW)

CCW welcomes this SPG. The only comment we have to make is that for almost all character areas, the guidance needs to build in the need to consider potential impacts of solar structures (reflectivity particularly) from the sea, there being a lot of fishing, boating tourist activity and so on in the area.

#### Officer Response

Additional guidance note added at paragraph 3.14:

...the impact of the siting of solar panels, particularly in terms of their reflectivity, should be considered in relation to views from the sea and the impacts that may have on sea users (e.g. for fishing, tourism and other commercial activities).

##### 2046 Mr Tom Lamshead, Network Rail Infrastructure Ltd

Network Rail has been consulted by Pembrokeshire Coast National Park Authority, on the Field Scale Solar Panels (insert for the Renewable Energy Supplementary Planning Guidance). Thank you for providing us with this opportunity to comment on this Planning Policy document.

Upon the review of this document, Network Rail has no specific comments to make about its content other than to advise that Network Rail has a statutory obligation to ensure the availability of safe train paths and as such we are required to take an active interest in any activity adjacent/close proximity to our property that potentially could affect the safe operation of the railway.

Accordingly our comments are as follows:

Our key interest is to protect the physical railway infrastructure, where sites bound or are in close proximity to the railway. We would have concerns relating to the safe operation of the railway in these locations.

Any proposed installation of Solar Panels adjacent to the railway should consider the following point at design stage to eliminate any risk to railway operations; the provision of any reflective material used in the solar collecting equipment should not interfere with the line of sight of train drivers and the potential for glare or reflection of light from the panels that may impact upon signalling must be eliminated.

#### Officer Response

This guidance point has been reflected in the main SPG text at paragraph 3.14, as follows:

Another consideration for site selection is the proximity of the railway network. The provision of any reflective material used on the panels should not interfere with the line of sight of train drivers (for public safety reasons). In addition, the potential for glare or reflection of light from

the panels that may impact upon signalling should be explored and eliminated.

**3617 Miss Rachael A Bust, The Coal Authority**

Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.

**Officer Response**

No change needed in response to this representation.

**3918 Bernadette Sheehan**

I welcome the preparation of guidance to cover these matters. The Pembrokeshire Coast National Park is designated for its stunning scenery and it is particularly important to protect this for the present and for future generations. It is this outstanding natural beauty which makes it so important in attracting tourism to the area. Whilst I support the principle of renewable energy and the viability of farms, it is important that the correct balance is struck so that the outstanding natural beauty of the Park is not compromised by inappropriate development. It should be possible to achieve a balance between the two, but as the Park is designated as a National Park which means that it is of the highest value visually, I think greatest weight should be given to this over renewable energy or farming operation needs.

The detailed analysis and guidance on the landscape character areas in connection with the Renewable Energy SPD is particularly welcomed in terms of its breadth and depth of analysis and guidance. However, I would like to raise the following concerns/objections.

**Officer Response**

See responses to comments made.

**3918 Bernadette Sheehan**

LCA9: Marloes

Should be a reference to protect views from Skomer and Skokholm islands to the mainland and not just from the mainland to the Islands

**Officer Response**

The existing 'key sensitivities' point has been amended to read:

- Coastal views, including to Skomer and Skokholm islands, as well as views back to this section of coast from Skomer and Skokholm.

A new guidance point has been added:

- Protect important views both to and from Skomer and Skokholm islands.

**3918 Bernadette Sheehan**

LCA12: St. Brides Bay

Overview and key sensitivities - Should include a reference to the grade 1 listed Roch Castle and its setting as this is visible in certain viewpoints along the coastal road.

Guidance - Should delete 'areas of small fields will be sensitive to all but the very smallest scale of PV development', as this is inconsistent with the coloured table above and the third point which states 'avoid all scales of pv development'. Suggest use of the word 'resist' rather than

'avoid' would better meet what seeking to achieve.

The guidance recognises that there is a strong relationship between the coastline and the internal landscape which means that the coastal edge is sensitive to all scales of PV development, but then in contradiction, it advises that developments are located at least one field back. One field back won't be sufficient to preserve the sensitivity and special character of the landscape and the relationship between the coastline and the internal landscape. Uninterrupted views should be maintained from the coast to the internal landscape to preserve its remote and strong cultural and historic sense of place.

A reference should be included to protecting views of St. Brides Bay and the coastline from the higher viewpoints of Rhyndaston and Cuffern Mountains, where there are public rights of way, from which there are outstanding panoramic unspoilt views of the whole of St. Brides Bay, including Ramsey and Skomer Islands, the coastline and Roch Castle.

#### **Officer Response**

Roch Castle has been added to the list of sensitivities and specifically mentioned as an important historic site to protect (including its setting)

The phrase 'one field back' has been removed from the guidance

A new guidance point has been added:

- Maintain uninterrupted views from the coast to the internal landscape to preserve its remote and strong cultural and historic sense of place.

The existing guidance point has been amended to read:

- Ensure PV development does not intrude on views to and along the coast and from local viewpoints (including the higher viewpoints of Rhyndaston and Cuffern Mountains), popular tourist and scenic routes such as the Pembrokeshire Coast Path, and rights of way. Avoid locating PV development where it would be directly overlooked at close quarters by important or sensitive viewpoints.

3918 **Bernadette Sheehan**

LCA13: Brandy Brook

Overview and key sensitivities should include a reference to the grade 1 listed Roch Castle and its setting which is visible from a substantial number of public viewpoints and public rights of way.

Guidance - Add 'and its setting' after Roch Castle as this is an integral part of the sensitivity of the listed building.

Typo on last point.

#### **Officer Response**

Amended 'key sensitivity': included as follows:

- Important prehistoric remains and views to the prominent 13th century Roch Castle

'and its setting' added to the relevant guidance point.

3918 **Bernadette Sheehan**

LCA14: Solva

Guidance - Last point include reference to Iron Age Hill fort.

#### **Officer Response**

Reference to Solva's Iron Age hill fort included in the last guidance point.

3918 **Bernadette Sheehan**

LCA15: Dowrog and Tretrio Commons

Guidance - Include key views 'from' the Carn Llidi Mountains as well as views to them.

**Officer Response**

'From' included in the statement about key views from the Carn Llidi Mountains.

3918 **Bernadette Sheehan**

LCA18: St. Davids Headland

Guidance - Protect views from Ramsey Island and not just to it.

**Officer Response**

and from' added to the statement about views to Ramsey Island.

3918 **Bernadette Sheehan**

LCA20: Trefin

Guidance - Should delete areas of small fields will be sensitive to all but the very smallest scale of PV development, as this is inconsistent with the third point which states avoid all scales of pv development. Use of the word 'resist' rather than 'avoid' would better meet what seeking to achieve.

**Officer Response**

This first point relates to 'small' fields, whereas the third point relates to 'very small fields' – so they are not contradictory. No amendments required.

3918 **Bernadette Sheehan**

LCA22: Mynydd Carningli

Key sensitivity should include extensive views from this area.

**Officer Response**

The following 'key sensitivity' has been added:

- Extensive views across the surrounding landscapes.

## Siting & Design of Farm Buildings

### 1633 Ms Andrea Winterton, Countryside Council for Wales (CCW)

Paragraph 2.2 - We suggest that PCNP's SPG on Landscape Character Assessment is also referenced. In very sensitive landscape settings it may be more appropriate to consider adaptive re-use of a traditional building rather than building new. The relationship between the farm buildings, farm house and its setting and the impact that new structures will have should be carefully considered.

#### Officer Response

Officers agree that a cross-reference to the SPG on Landscape Character Assessment would be of value. Para. 3.1 summarises the main design considerations when planning new buildings, and the 1st bullet point could usefully refer to consideration of the scope for re-use of traditional buildings, although it must be recognised that such potential will only exist in some cases.

Rec: Add new footnote to para. 2.2 reading "See the Authority's guidance on Landscape Character Assessment for further information." Amend 1st bullet point, para. 3.1 to end ".....the construction materials, landscaping and the scope for re-using existing buildings will all help to reduce the visual impact of a new farm building."

### 1633 Ms Andrea Winterton, Countryside Council for Wales (CCW)

Paragraph 3.1 footnote 3 - Because of the sensitivity of the National Park landscape and so as not to raise expectations where there might be limited opportunity for solar panels, we recommend that this footnote also makes reference to the SPG on solar panels that is currently being consulted on by the National Park Authority.

#### Officer Response

Officers would agree that a reference to the SPG on solar panels would be of value.

Rec: Add new sentence to footnote 3, para. 3.1, reading "See the Addendum to the Renewable Energy Supplementary Guidance for further information about solar panels."

### 1633 Ms Andrea Winterton, Countryside Council for Wales (CCW)

Paragraph 4.1 - We suggest that there should be a reference the need for listed building consent when considering alterations to existing listed buildings.

#### Officer Response

Historic landscapes and buildings are considered in section 9.0, and officers would agree that a reference to Listed Building Consent would be of value.

Rec: Add new final sentence to bullet point under 9.0 on historic landscapes and buildings reading "The need for Listed Building Consent should be considered where alterations to listed buildings are concerned."

### 1633 Ms Andrea Winterton, Countryside Council for Wales (CCW)

Paragraph 5.3 - We recommend that the following is added to this paragraph. "However, every effort should be made to retain existing buildings which are of historic interest, seeking to adapt and repair rather than remove. Where existing farm buildings are listed design considerations



include the potential impact that a new building will have on the setting of the existing."

**Officer Response**

Historic landscapes and buildings are considered in section 9.0, and officers would agree that cross-reference to impacts on the setting of a listed building and for retention of listed buildings would be of value.

Rec: Amend start of 2nd sentence of 2nd bullet point in section 9.0 to read "Potential impact on listed buildings and their settings ....." Add new final sentence under section 9.0 to read "Every effort should be made to retain buildings which are of historic interest, seeking their repair and adaptation rather than removal."

**1633 Ms Andrea Winterton, Countryside Council for Wales (CCW)**

Paragraph 5.4 - We suggest that the following is included at the end of the paragraph... 'The use of reflective materials in this context should be avoided.'

**Officer Response**

Officers would agree that light reflection is a relevant consideration, and this is considered under para. 5.17, colour of material. Para. 5.4 identifies relevant design considerations, which are then dealt with in the following sections, and "reflectivity of materials" could usefully be added to the list.

Rec: Insert "reflectivity of materials" to fifth line of para. 5.4, between "outline" and "colour."

**1633 Ms Andrea Winterton, Countryside Council for Wales (CCW)**

9.0 Other considerations - We welcome the clarification that proposals will need to consider biodiversity interests. However, we recommend that the text is also supported by a cross-reference to relevant biodiversity policies in the LDP.

**Officer Response**

Officers would agree that a cross-reference to the LDP biodiversity policies would be of value.

Rec: Add new footnote to 1st bullet point, section 9.0, Other Considerations, to read "See Local Development Plan policies 10 and 11 for further information."

**1633 Ms Andrea Winterton, Countryside Council for Wales (CCW)**

11.0 Useful Contacts - We recommend that the Council's Biodiversity officer and CCW are added to the list of useful contacts, particularly with regard to developments that might affect Special Areas of Conservation (SACs) or Special Protection Areas (SPAs) and Protected Species.

**Officer Response**

Officers will be happy to add CCW to the list of useful contacts. On reflection, officers feel that it is not appropriate to list individual officer names, as these may change, and it would be better to make a general statement of the support that is available from the Authority.

Rec: Add CCW local office to list in section 11.0. Delete individual NPA officer names, and add sentence in section 10.0 stating "Advice is also available on access, tree, building conservation and biodiversity matters."

**1633 Ms Andrea Winterton, Countryside Council for Wales (CCW)**

Appendix 1 Holding Over 5 hectares? - To more accurately reflect the provisions of the 1995 General Permitted Development Order (GDPO), we recommend that this section of the SPG should refer to holdings of 5 hectares or more rather than holdings over 5 hectares.

**Officer Response**

Officers would agree that this suggested wording would be more accurate.

Rec: Amend 2nd heading under Appendix to read "Holdings of 5 hectares or more."

**1633 Ms Andrea Winterton, Countryside Council for Wales (CCW)**

CCW very much welcomes the opportunity to comment on these documents, which we believe will provide sufficiently detailed will provide sufficiently detailed guidance for potential developers to be very clear what is required, over and above the policies within the Local Development Plan. Please see our comment on both these SPG consultation documents below.

**Officer Response**

Support for guidance noted and welcomed.

Rec: No amendment needed.

**1633 Ms Andrea Winterton, Countryside Council for Wales (CCW)**

**Appendix 1**

Given that there is a possibility for many rural buildings in the PCNP to have implications for SAC or SPA features, particularly in relation to mobile species features such as bats and chough, or indeed where there is hydrological continuity with some of our wetland/river SACs, we recommend that appendix 1 is amended to also make reference to the requirement to give prior notification to the Local Planning Authority (LPA) under Regulation 73 of the Conservation of Habitat and Species Regulations 2010.

**Officer Response**

Officers would agree that reference to this requirement would be of value.

Rec: Add at the end of the prior notification procedure on page 14 to read "Under Regulation 73 of the Conservation of Habitats and Species Regulations, 2010, where development is likely to have a significant effect on a Special Area of Conservation or Special Protection Area, it is a condition of any planning permission granted under these arrangements that prior notification be given to the NPA before starting work."

**2881 Mr Hugh Bishop, Dale Community Council**

It is noted that the proposed PCNPA Supplementary Planning Guidance for Siting and Design of New Farm Buildings:

1 - Appreciates that new farm buildings are necessary and that changes to farming practice, regulation and legislation have created the need for larger (often single span) buildings, BUT

2 - wants such buildings to be integrated as much as possible into the landscape and to reflect

local design tradition.

While there is general support for these principles it is thought that the Consultation DRAFT of the proposed Supplementary Planning Guidance should make a clear emphasis on the need to ensure that the cost effectiveness and operational efficiency of planning solutions should always be a factor taken into consideration by the planning authority. This is required in order to support and maintain the necessary partnership between PCNPA and the farmers which has 'an essential role in shaping the countryside of the National Park'.

It is suggested that the DRAFT of the proposed Supplementary Planning Guidance should be changed and adjusted to take account of the following points:

A Para 2.1 - although it is agreed that 'agriculture has an essential role in shaping the countryside of the National Park', it should be noted that agriculture is also an industry and a business. Unless the business efficiency of the farming industry is sustained and supported it will be less able to fulfil its role in the partnership with PCNPA in maintaining the special qualities of the National Park, including its diversity of landscape and cultural heritage. It is suggested, therefore, that Para 2.1 should be amended by the following words at the end of this paragraph (after the words 'trees, woodland and copses'):

"... it is, therefore, a key requirement that this planning guidance should at all times support and sustain the necessary partnership with the farming industry which is essential in shaping the countryside of the National Park, even if this means that materials used are not necessarily locally sourced, so long as they are generally integrated with the landscape and the cultural heritage of the area."

#### **Officer Response**

Officers would endorse the emphasis given in this and other representations to the concept of partnership between the NPA and the farming industry. While this should not be interpreted as the NPA unduly favouring farming applications, it is agreed that the spirit of partnership is one that could reasonably be referred to in para 2.1. Amendments proposed to para 2.1 in response to NFU comments will recognise the importance of agriculture as an industry, the NPA's commitment to a constructive approach towards new development and its support for WG objectives for the future of farming in Wales.

While paras 2.1 and 3.1 refer to locally sourced and sustainably sourced materials as contributing to local building character and a sustainable design approach, officers do not regard the later section on materials as unduly restrictive.

Rec: Amend 1st sentence to 2.1 to read "Agriculture is a key and strategically important industry within the national park, and has a central role in shaping management of its landscape." Add two further, final sentences to 2.1 to read "The NPA supports the Welsh Government's objectives for a sustainable and profitable future for farming while safeguarding the environment and contributing to the vitality and prosperity of our rural communities. The NPA will adopt a constructive approach towards agricultural development proposals, and will foster a spirit of partnership with the farming community in pursuit of a sustainable future."

#### **2881 Mr Hugh Bishop, Dale Community Council**

B Para 3.1 The importance of design - although it is agreed that farm buildings should be designed in a way that is sympathetic to their setting and not damaging to the National Park character / landscape, it is suggested that this paragraph should be extended by an additional sub-paragraph to read:

Support cost effective solutions - any development should incorporate cost effective design solutions which encourage and support the necessary partnership with the farming industry which is essential in shaping the countryside of the National Park.

**Officer Response**

Officers would accept that cost effectiveness and operational efficiency are central design principles, which could usefully be stated as a new bullet point in 3.1.

Rec: Add new 1st bullet point to 3.1, reading "Achieving a cost-effective and operationally efficient building."

**2881 Mr Hugh Bishop, Dale Community Council**

C Para 5.2 - Siting - while it is accepted that "the existing development can help to give a built context and is less intrusive than new isolated development", it is not always possible or (within the context of operational efficiency) sensible to site new buildings within existing farm complexes. It is suggested that this paragraph should be amended to make it clear that this is not intended as an absolute prohibition to new buildings which sit outside existing farm complexes. It is suggested that this paragraph should be amended to read:

"Preference should be given to new buildings which sit within existing farm complexes since the existing development can help to give a built context which is less intrusive than new isolated development, however it is recognised that such siting is not always possible or practical and that operational and practical considerations should be fully taken into account in order to sustain and support the necessary partnership with the farming industry which is essential in shaping the countryside of the National Park ....."

**Officer Response**

The list of siting and other design guidance points made in the SPG is not intended to be prescriptive, and the guidance should not be interpreted as providing a prohibition, for example, of all new buildings outside existing farm complexes. Rather, appropriate design solutions should emerge from consideration of the guidance as a whole in the context of the particular farm needs and the site circumstances. This could usefully be made clear through an addition to para 5.1 introducing the detailed design guidelines. The Community Council's suggested amendment to the wording of para. 5.2 represents a reasonable balance on the advantages of siting new buildings within existing farm complexes, an issue which has also been raised by other respondents.

Rec: Add new 1st sentence to para 5.1 reading "The design guidance set out in the following sections is not intended to be prescriptive, but rather to help shape schemes that meet the farmers' needs and are in harmony with their surroundings. What will be appropriate in a particular case will depend on the nature of the individual proposals and the site circumstances. Buildings for livestock housing, for example, will raise different issues to those for storing grain, straw or potatoes." Amend 5.2, 1st sentence, to read "Preference should be given to new buildings which sit within or are well related to existing building complexes, since the existing development can help to provide a context which is less intrusive than new isolated development. However, it is recognised that such siting is not always appropriate, for operational, pollution control or other practical reasons."

**2881 Mr Hugh Bishop, Dale Community Council**

D Para 5.7 - Form and Design - once again, although it is agreed that modern farm buildings need to be carefully designed, it is proposed that this section should be amended to include some explicit reference to the need to take into account the requirements imposed by practical and operational considerations of the farmer whose partnership in shaping the countryside of the National Park is essential. It is suggested that this paragraph should be amended by the addition of the following sub-paragraph immediately following the words "Consideration should be given to:"

"Supporting and sustaining the reasonable operational and practical needs of the farmer in order to maintain the necessary partnership with the farming industry which is essential in shaping the countryside of the National Park."

#### **Officer Response**

Officers understand the points made in these representations, and the amendments proposed to the text in response to the Council's other representations to recognise the importance of schemes meeting farmers' needs would cover them appropriately, without having to repeat them in each section of the guidance.

Rec: No further change needed.

#### **2881 Mr Hugh Bishop, Dale Community Council**

E Para 6.1 - Landscaping - once again it is proposed that this section should be amended to include some explicit reference to the need to take into account the requirements imposed by practical and operational considerations of the farmer whose partnership in shaping the countryside of the National Park is essential. It is suggested that the following words should be added at line 9 of Para 6.1 after the words " for developments which require planning permission".

"... and such consideration shall always include consideration of the reasonable operational and practical needs of the farmer in order to maintain the necessary partnership with the farming industry which is essential in shaping the countryside of the National Park. Artificial bunds....."

#### **Officer Response**

Officers understand the points made in these representations, and the amendments proposed to the text in response to the Council's other representations to recognise the importance of schemes meeting farmers' needs would cover them appropriately, without having to repeat them in each section of the guidance.

Rec: No further change needed.

#### **2881 Mr Hugh Bishop, Dale Community Council**

F Para 8.2 - Access roads - once again it is proposed that this section should be amended to include some explicit reference to the need to take into account the requirements imposed by practical and operational considerations of the farmer, whose partnership in shaping the countryside of the National Park is essential. It is suggested that Para. 8.2 should be amended by inserting an additional (first) sub-paragraph, as follows:

"Consider the reasonable operational and practical needs of the farmer and seek to accommodate such requirements in order to maintain the necessary partnership with the

farming industry which is essential in shaping the countryside of the National Park."

**Officer Response**

Officers understand the points made in these representations, and the amendments proposed to the text in response to the Council's other representations to recognise the importance of schemes meeting farmers' needs would cover them appropriately, without having to repeat them in each section of the guidance.

Rec: No further change needed.

**2897 Mrs YC Evans, Marloes & St Brides Community Council**

Please find below comments from my Council with regard to this document:

2.2 - This key requirement will have the direct result of disadvantaging National Park based farmers.

**Officer Response**

The guidance is specifically intended to help farmers meet their needs in harmony with the environment. The proposed amendments to the text specifically referring to the desire for the NPA to work in partnership with the farming community and recognising the importance of schemes meeting their need efficiently and cost-effectively would, we hope, reassure the Community Council on this point. See changes proposed to paragraphs 2.1 and 3.1.

**2897 Mrs YC Evans, Marloes & St Brides Community Council**

5.2 - This presents a difficulty with existing farmsteads. Farmsteads were traditionally constructed near watercourses - this presents conflict with the environment. Why should sites near to public highways and public rights of way be avoided?

**Officer Response**

There will undoubtedly be situations where siting new farm buildings within existing farm complexes would not be appropriate for operational, pollution control, landscape or other reasons. However, where such issues do not arise, locating new buildings within or adjacent to existing building complexes remains a sound general principle. Other representations on this point have suggested a wording amendment which neatly deals with this point. The detailed points in 5.2 are advisory rather than prescriptive, and not all will be relevant to all circumstances. Isolated new buildings constructed hard on a highway may well be more visually intrusive than one located within an existing building complex; and it does not follow that a new access track will be required for siting away from a highway. There is not, therefore, any inherent conflict with the advice in section 8.0 "Access Roads". The relationship of a new building to PROW will be a further factor to be taken into account along with other considerations, with a view to achieving a scheme that is both practical and offers a "best fit" in relation to the particular site and its setting.

Rec: Amend 5.2, 1st sentence, to read "Preference should be given to new buildings which sit within or are well related to existing building complexes, since the existing development can help to provide a context which is less intrusive than new isolated development. However, it is recognised that such siting is not always appropriate, for operational, pollution control or other practical reasons."

**2897 Mrs YC Evans, Marloes & St Brides Community Council**

5.3 - This suggestion could reduce potential production.

**Officer Response**

Consideration of the scope for rationalisation of buildings under 5.3 is intended to be with the cooperation of landowners to identify worthwhile opportunities to achieve landscape improvements through the removal of unsightly buildings no longer in use. It is not intended to be prescriptive or to place unreasonable demands on landowners. Any conditions applied to planning permissions would have to satisfy WG criteria, and there would be a right of appeal if considered unreasonable by the applicant. Officers would seek to reassure the respondent that this provision is not intended as a measure to constrain development or production.

Rec: Amend para 5.3 to read '5.3 When planning a new building, landscape enhancement opportunities may arise to rationalise of the use of existing buildings on the farmstead and to remove buildings of particularly poor appearance or those in a poor state of repair (providing they have no historic merit).

Rec: Amend paragraph 5.3 to read 'When planning a new building, landscape enhancement opportunities may arise through rationalisation of the use of existing buildings on the farmstead or by removing buildings of particularly poor appearance or those in a poor state of repair (providing they have no historic merit).'

**2897 Mrs YC Evans, Marloes & St Brides Community Council**

5.7 - This proposal serves to increase costs.

**Officer Response**

The practical advantages of large, single-span buildings are recognised by the NPA, and the SPG does not set out to prohibit them. It is considered appropriate to mark up that such buildings pose a greater challenge if they are to be integrated successfully into the landscape. Para 5.7 identifies some possible means of achieving this, whether or not a single-span approach is adopted. There is no wish to disadvantage national park farmers compared with those elsewhere; and in response to other, related comments it is proposed to amend sections 2.0 and 3.0 to emphasise that operational efficiency and cost-effectiveness are central design considerations. Where requirements did lead to additional costs they would be for clearly justified reasons that enabled a scheme to go ahead that may otherwise have been unacceptable.

Rec: Please see amendments proposed to Section 2 and 3 of the guidance.

**2897 Mrs YC Evans, Marloes & St Brides Community Council**

It is not clear from your document whether the local farming unions were consulted with regard to this document. They would have knowledge as to how these proposals would impact on a valuable local industry, particularly for those members based in the National Park areas who face more stringent planning controls than those elsewhere.

**Officer Response**

The two national farming unions and CLA were important consultees on this draft SPG, but they were not involved in the preparation of the draft itself. This is the normal practice in preparing consultation drafts. The Community Council will note from this report how the comments made by the farming community have positively informed the preparation of the final SPG.



Rec: No change needed.

**3478 Mr Peter Smithies**

5.2 New buildings should sit with existing farm complexes.

Farmsteads were traditionally sited close to easily accessible water, by siting buildings close to old farmsteads there is an increased risk of pollution of water courses, as well as increased cost of pollution control. The confines of a traditional farmyard are unsuitable for modern machinery.

**Officer Response**

There will undoubtedly be situations where siting new farm buildings within existing farm complexes would not be appropriate for operational, pollution control, landscape or other reasons. However, where such issues do not arise, locating new buildings within or adjacent to existing building complexes remains a sound general principle. Other representations on this point have suggested a wording amendment which neatly deals with this point.

Rec: Amend 5.2, 1st sentence, to read "Preference should be given to new buildings which sit within or are well related to existing building complexes, since the existing development can help to provide a context which is less intrusive than new isolated development. However, it is recognised that such siting is not always appropriate, for operational, pollution control or other practical reasons."

**3478 Mr Peter Smithies**

Avoid prominent sites including those near to public highways and public rights of way.

Buildings erected away from highways will require access tracks, and therefore more expense and is a odds with 8.0 Access Roads. What is the reason behind this advice? Many farms have PROW's passing through the yard.

**Officer Response**

The detailed points in 5.2 are advisory rather than prescriptive, and not all will be relevant to all circumstances. Isolated new buildings constructed hard on a highway may well be more visually intrusive than one located within an existing building complex; and it does not follow that a new access track will be required for siting away from a highway. There is not, therefore, any inherent conflict with the advice in section 8.0 "Access Roads". The relationship of a new building to PROW will be a further factor to be taken into account along with other considerations, with a view to achieving a scheme that is both practical and offers a "best fit" in relation to the particular site and its setting.

Rec: No changes required.

**3478 Mr Peter Smithies**

5.3 Wherever possible when planning a new building, the opportunity should be taken to rationalise the use of existing buildings on the farmstead and to remove buildings of particularly poor appearance or those in a poor state of repair (providing they have no historic merit).

This policy, if adopted, would give the PCNPA the power to constrain development on condition of removal of 'unsightly' buildings.



### **Officer Response**

Consideration of the scope for rationalisation of buildings under 5.3 is intended to be with the cooperation of landowners to identify worthwhile opportunities to achieve landscape improvements through the removal of unsightly buildings no longer in use. It is not intended to be prescriptive or to place unreasonable demands on landowners. Any conditions applied to planning permissions would have to satisfy WG criteria, and there would be a right of appeal if considered unreasonable by the applicant. Officers would seek to reassure the respondent that this provision is not intended as a measure to constrain development.

Rec: Amend paragraph 5.3 to read 'When planning a new building, landscape enhancement opportunities may arise through rationalisation of the use of existing buildings on the farmstead or by removing buildings of particularly poor appearance or those in a poor state of repair (providing they have no historic merit).'

### **3478 Mr Peter Smithies**

Modern farm buildings need to be carefully designed. Large single span buildings can potentially cause the greatest visual impact.

Large single span buildings are practical modern buildings for practical modern farming techniques and systems.

PCNPA have a statutory duty to foster the economic development of the communities of the Park. These policies will penalise farmers in the park, putting them at competitive disadvantage to their competitors outside the park.

### **Officer Response**

The practical advantages of large, single-span buildings are recognised by the NPA, and the SPG does not set out to prohibit them. It is considered appropriate to mark up that such buildings pose a greater challenge if they are to be integrated successfully into the landscape. Para 5.7 identifies some possible means of achieving this, whether or not a single-span approach is adopted. There is no wish to disadvantage national park farmers compared with those elsewhere; and in response to other, related comments it is proposed to amend sections 2.0 and 3.0 to emphasise that operational efficiency and cost-effectiveness are central design considerations.

Rec: No further change required.

### **3782 Mr Peter Howells, NFU Cymru**

I refer to your recent consultation on Supplementary Planning Guidance on the Siting & Design of Farm Buildings within the Pembrokeshire Coast National Park Authority in which you asked for comments. I submit this response on behalf of NFU Cymru members in Pembrokeshire, many of whom own and manage the farmland which makes up the majority of the National Park area.

#### **General Comments**

- Whilst it is difficult to generalise what an effective planning process would mean for each of our individual members, NFU Cymru would contend that the Pembrokeshire Coast National Park Authority (PCNPA) should demonstrate a thorough understanding and appreciation of the role of agriculture, not only from the perspective of farmers as food producers and owners/managers of the countryside, but also having regard to the critical economic relationships between the

appearance of the countryside and the need for profitable businesses to sustain it.

- The planning system in the PCNPA should objectively assess the development needs of areas of the PCNPA; therefore it is absolutely crucial that there is a supportive and robust investment framework in place. Certainty on the planning front is an important part of that framework, and particularly so in terms of business sustainability and expansion.

- Section 4.1.2 of Planning Policy Wales states that Sustainable Development in Wales means enhancing the economic, social and environmental well-being of people and communities, achieving a better quality of life for our own and future generations in way which:
  - promote social justice and equality of opportunity and
  - enhance the natural and cultural environment and respect it's limits - using only our fair share of the earth's resources and sustaining our cultural legacy.

#### **Officer Response**

Planning Policy Wales (PPW) and the Local Development Plan, the latter prepared in the context of the Wales Spatial Plan, provide a comprehensive policy framework for development, which pays full regard to the roles of farming within a national park context.

Rec: No change needed.

#### **3782 Mr Peter Howells, NFU Cymru**

- NFU Cymru questions the assumption made in section 5.2 which states that all new buildings should sit within existing farm complexes. Farm complexes have historically and traditionally been developed in close proximity to water sources, however one could argue that new buildings constructed within existing farm complexes which are close to water courses can actually increase the risk of pollution. We would also argue that many older and more traditional farmyards are unsuitable areas for using large modern agricultural tractors, implements and machinery.

#### **Officer Response**

There will undoubtedly be situations where siting new farm buildings within existing farm complexes would not be appropriate for operational, pollution control, landscape or other reasons. However, where such issues do not arise, locating new buildings within or adjacent to existing building complexes remains a sound general principle. Other representations on this point have suggested a wording amendment which neatly deals with this point.

Rec: Amend 5.2, 1st sentence, to read "Preference should be given to new buildings which sit within or are well related to existing building complexes, since the existing development can help to provide a context which is less intrusive than new isolated development. However, it is recognised that such siting is not always appropriate, for operational, pollution control or other practical reasons."

#### **3782 Mr Peter Howells, NFU Cymru**

- We note the advice given in section 5.2 on using existing or newly planted vegetation to screen the building or to soften its appearance. Whilst NFU Cymru does not object to a reasonable amount of planting and landscaping we do feel that planning officers need to take a long term view on this as it will take some time for the visual screen to become established after any planting.

### Officer Response

The comments are noted, and officers would confirm that the NPA looks at planting as a long term consideration, with Section 6 offering further advice on planting principles.

Rec: No change required.

### 3782 Mr Peter Howells, NFU Cymru

- NFU Cymru has some concerns with the statement expressed in section 5.3 that wherever possible when planning a new building, the opportunity should be taken to rationalise the use of existing buildings on the farmstead and to remove buildings of particularly poor appearance or those in a poor state of repair (provided that they have no historic merit). Whilst at first glance this would appear to be a reasonable statement we are concerned this could give the PCNPA the power to put conditions on planning applicants forcing them to remove what the PCNPA would deem to be “unsuitable” buildings. We’re therefore concerned that this could place constraints on legitimate developments.

### Officer Response

Consideration of the scope for rationalisation of buildings under 5.3 is intended to be with the cooperation of landowners to identify worthwhile opportunities to achieve landscape improvements through the removal of unsightly buildings no longer in use. It is not intended to be prescriptive or to place unreasonable demands on landowners. Any conditions applied to planning permissions would have to satisfy WG criteria, and there would be a right of appeal if considered unreasonable by the applicant. Officers would seek to reassure the respondent that this provision is not intended as a measure to constrain development.

Rec: Amend paragraph 5.3 to read 'When planning a new building, landscape enhancement opportunities may arise through rationalisation of the use of existing buildings on the farmstead or by removing buildings of particularly poor appearance or those in a poor state of repair (providing they have no historic merit).'

### 3782 Mr Peter Howells, NFU Cymru

- In Section 5.7 it states that large single span buildings can potentially cause the greatest visual impact, however NFU Cymru would also argue that large single span buildings are practical and efficient modern buildings designed to meet the needs of modern farming systems. Whilst livestock buildings tend to be lower in height, buildings which are constructed for the storage of straw, grain or potatoes need to be much higher in height. Split roof lines can add significant cost, particularly in buildings which have internal fitments such as conveyer belts attached to the roof. This is an extremely important practical consideration as a single open span building is also far more compatible with modern farming practices, in particular for the safe operation of large tractors and trailers or for the loading and unloading of lorries and articulated vehicles.

### Officer Response

The practical advantages of large, single-span buildings are recognised by the NPA, and the SPG does not set out to prohibit them. It is considered appropriate to mark up that such buildings pose a greater challenge if they are to be integrated successfully into the landscape. Para 5.7 identifies some possible means of achieving this, whether or not a single-span approach is adopted. There is no wish to disadvantage national park farmers compared with those elsewhere; and in response to other, related comments it is proposed to amend sections 2.0 and 3.0 to emphasise that operational efficiency and cost-effectiveness are central design

considerations.

Rec: No further change required.

**3782 Mr Peter Howells, NFU Cymru**

•The guidance also states that consideration should be given to varying the standard rectangular plan and to dividing the building into two smaller ones which can then be more easily incorporated into an existing group. NFU Cymru contends that a rectangular shape is invariably the most efficient for a farm building. We also believe that dividing the building into two smaller structures will often not be compatible with modern farming methods and again lead to practical difficulties with the operation of larger modern tractors and trailers and telescopic handlers which are now common place on farms.

**Officer Response**

The practical advantages of large, single-span buildings are recognised by the NPA, and the SPG does not set out to prohibit them. It is considered appropriate to mark up that such buildings pose a greater challenge if they are to be integrated successfully into the landscape. Para 5.7 identifies some possible means of achieving this, whether or not a single-span approach is adopted. There is no wish to disadvantage national park farmers compared with those elsewhere; and in response to other, related comments it is proposed to amend sections 2.0 and 3.0 to emphasise that operational efficiency and cost-effectiveness are central design considerations.

Rec: No further change required.

**3782 Mr Peter Howells, NFU Cymru**

•Section 5.9 suggests the use of traditional local stone as a material but we have concerns that local stone is likely to be very expensive to purchase and will drive the costs of construction up further.

**Officer Response**

Section 5.9 is not prescriptive in identifying local stone as a potentially suitable material, in particular for building plinths. Opportunities may exist in particular circumstances to make use of available stone, rather than necessarily having to buy new stone, and officers consider the draft SPG reference to stone to be appropriately weighted.

Rec: No change needed.

**3782 Mr Peter Howells, NFU Cymru**

•Section 5.12 suggests timber boarding as a suitable cladding material. Whilst this may be a suitable solution for livestock buildings it certainly is not practical for the construction of grain or potato stores as they don't provide sufficient protection from mites, insects and birds. These can cause severe detrimental damage to arable and fodder crops and therefore have severe economic consequences for the farmer.

**Officer Response**

The comments are noted. The reference to vertical timber boarding as a cladding material is not intended to be prescriptive or to suggest that it would be appropriate for all buildings in all

circumstances. Nevertheless, the comment gives worthwhile information, and the text could be usefully amended to include it.

Rec: Amend start of para. 5.12 to read “Vertical timber boarding remains a popular cladding material, in particular for livestock buildings ...”

**3782 Mr Peter Howells, NFU Cymru**

- Further to the comments in section 6.3 NFU Cymru questions the right of the PCNPA to impose any conditions on planning applications which are submitted under the prior notification procedure.

**Officer Response**

Welsh Government guidance in TAN6, Planning for Sustainable Rural Communities, Annex A, para. A8, makes clear in respect of the prior notification procedures that, subject to the normal criteria governing the use of conditions in planning permissions, conditions may be imposed when approval is given, with the usual right of appeal by the applicant.

Rec: No change needed.

**3782 Mr Peter Howells, NFU Cymru**

- NFU Cymru questions the statement in section 7.1 that planned extensions to buildings should be “subservient” to the original building. There is no reason why an extension to an existing structure should be smaller in scale than the original building. The important point here is with the quality of design. We would also argue that it’s not necessary for the materials used in the extension to match the existing building as closely as possible. This can actually be a mistake as it’s often difficult to build a satisfactory extension with old weathered materials and the best solution may actually be contrasting but complementary materials.

**Officer Response**

Officers would recognise that the principle of “subservience” of an extension to the original building will not be appropriate in every circumstance, although it remains a useful consideration, particularly in respect of traditional buildings. It would also accept that it will not always be appropriate for materials to match the original, as the text already recognises to an extent. An amendment to the text to reflect this would be appropriate.

Rec: Amend 2nd and 3rd sentences in para. 7.1 to read “Consideration should also be given to the visual benefits of an extension that is subservient (smaller in scale) to the original building and that matches it in design and materials.” Amend 4th sentence to read “However, an alternative solution may be best, particularly where the appearance of the existing building is poor and the proposed extension would be prominent.”

**3782 Mr Peter Howells, NFU Cymru**

- The guidance states that consideration should be given to using multi-span structures which reduce the bulkiness of the roof and enable the gable elevation to be in more than one plane. NFU Cymru have concerns as the construction of multi span structures means dividing up the internal space of the building and as such makes the new building less efficient.

**Officer Response**

The advisory points referred to are not prescriptive, but, rather, points for consideration, and officers would accept that they will not always be appropriate. Much will depend on the particular circumstances and needs, but as points for consideration officers consider them relevant and reasonable. The potential advantages of single-span buildings are recognised in the draft SPG. There is no wish to disadvantage national park farmers, and it is proposed in sections 2 and 3 to emphasise that operational efficiency and cost-effectiveness are central design considerations.

Rec: No further amendment needed.

**3782 Mr Peter Howells, NFU Cymru**

•NFU Cymru is particularly concerned that the Supplementary Planning Guidance, as currently drafted, could potentially disadvantage those farmers who may wish to change their farming system and consequently need to construct new buildings. We also have concerns about the potential barriers to development for those farmers who may have the opportunity to expand their businesses by acquiring more land or by purchasing a neighbouring farm where the buildings require modernisation and updating.

**Officer Response**

Officers would not accept that the form and structure of the SPG disadvantages farmers seeking to change their farming system or to acquire additional land or farms. Rather, the guidance provides assistance for all farmers in planning new developments. The insertion of specific reference to such circumstances in para 2.2, along with complementary changes in response to other representations should reassure the respondent on this point.

Rec: Amend 1st sentence of para 2.2 to read “Changes in farming practices and systems, the requirements of new environmental, hygiene and animal welfare legislation have created a demand for new and larger buildings”.

Amend first sentence in 3.1 to read “A constructive approach towards agricultural development proposals is proposed.”

**3782 Mr Peter Howells, NFU Cymru**

•We would also point to the fact that many of the planning requirements outlined in this draft guidance add extra financial costs to the design and construction of any new farm buildings and as such present a significant barrier, particularly for young farmers looking to enter the industry. PCNPA has a statutory duty to foster the economic development of the communities within the area and NFU Cymru feels that this planning guidance, as currently drafted, puts farmers in the PCNPA area at a disadvantage compared to those farming outside the PCNPA.

**Officer Response**

Officers would not agree that the adoption of sympathetic design practices would necessarily add significantly to development costs in the national park compared with developments outside it; and the NPA will wish to agree practical and reasonable design solutions with applicants. Where circumstances would give rise to significant additional costs, they would need to be justified and essential to allow a development to proceed.

Rec: No change needed.

**3782 Mr Peter Howells, NFU Cymru**

- NFU Cymru accepts the basic principle of sustainable development and the three key components of economic, social and environmental. However, we would argue that there tends to be an imbalance which favours the 'environmental component' when considering planning policy in the PCNPA.

#### **Officer Response**

The NPA view is that the three dimensions of sustainable development, economic, social and environmental, are indivisible: all need to be in harmony if development is to be truly sustainable, and officers would not accept, therefore, that the NPA "favours" one element over another as suggested.

Rec: No change needed.

#### **3782 Mr Peter Howells, NFU Cymru**

- Given that there is now a renewed recognition across Government, whether at local, Welsh Government, Westminster or European level of the importance of food production and the agriculture industry, planning guidance needs to reflect this. Farming is at the heart of an agri-food industry, with agricultural output in Wales valued at £1.2billion in 2010. Future planning guidance must therefore view food production and processing policies alongside, rather than in competition to, environmental sustainability. It is our view that the challenge for society in the years ahead will be to meet the ever increasing global demand for food whilst recognising that a thriving natural environment can exist as well. This will require a planning system that is clear, focussed, relevant, but above all flexible enough to accommodate these increasing demands.

- The vast majority of the PCNPA area is managed by farmers and the continuing economic viability of the agricultural industry in the area remains crucial in conserving, sustaining and enhancing the area at the present time and into the future. It is our view that dialogue between the PCNPA and farming communities could be improved in order to identify opportunities within local areas which would in turn, stimulate economic growth, develop renewable energy production and create additional and affordable housing, whilst ensuring that the challenges of producing food for a growing population are met.

#### **Officer Response**

NFU Cymru sets out succinctly the strategic importance of agriculture to Wales, as well as the future challenges for society, and the NPA will wish to develop further its dialogue with the farming industry and community in the years ahead. The NPA supports WG's objectives for a sustainable and profitable future for Welsh farming (Planning Policy Guidance 6, para. 6.1) and for local planning authorities to adopt a constructive approach towards agricultural development. Each of these dimensions could usefully be noted in para.2.1 of the SPG.

Rec: Amend 1st sentence to 2.1 to read "Agriculture is a key and strategically important industry within the national park, and has a central role in shaping management of its landscape." Add two further, final sentences to 2.1 to read "The NPA supports the Welsh Government's objectives for a sustainable and profitable future for farming while safeguarding the environment and contributing to the vitality and prosperity of our rural communities. The NPA will adopt a constructive approach towards agricultural development proposals, and will foster a spirit of partnership with the farming community in pursuit of a sustainable future."

#### **3918 Bernadette Sheehan**



### Design of Farm Buildings

I think it should be made clear in the guidance that if the building is of the wrong scale or in the wrong location in the first place, that there is an inherent objection to it in principle and that the adverse impact on the landscape cannot be mitigated through landscaping. Landscaping cannot make a building which is wrong right. It should be of a good quality design in the first place. Further, there is no guarantee that the landscaping will survive in the longer term whereas most likely the building will.

### Officer Response

The purpose of the SPG is not to set out policy towards new farm buildings: policy is set out in Planning Policy Wales and the Local Development Plan. In practice, schemes that do not meet policy and fail to respond positively to the SPG would be refused planning permission. Landscaping is regarded by the SPG as an integral part of the design process, and the respondent should be reassured that it would not be applied as a cover for poor quality design. Planning conditions can be used to provide for maintenance and retention of landscaping requirements.

Rec: No changes required.

### 4188 Mr J Llewelin, J Llewelin & Co

We are writing to you regarding the consultation with Pembrokeshire Coast National Park about planning for farm buildings. We are very concerned about certain aspects regarding the implication for building which are not necessarily livestock buildings.

This type of building is likely to be just the opposite to what is in the consultation document i.e.:- high, single span, one long continuous roof line, and because of their size slightly removed from existing farm buildings, which in some instances will mean it is more conspicuous.

We know of at least one store in a similar situation which has been built and they had difficulty with planning with the current regulations, so it is likely that it will be even more difficult in future. As I am sure you are aware split roof lines add considerably to the cost of such buildings and in a building where you have internal fitments (conveyors ducting etc.) attached to the inside of the roof structure the cost will be exaggerated even more.

Most livestock buildings tend to be relatively lower but anybody considering a building for straw, grain or potatoes will be at a big disadvantage, as these need to be much higher. These buildings will also run into more expense if conditions are implemented such as stone facing to walls, and of course wood cladding is not acceptable for grain or potato stores, because of difficulty with mites, insects, birds and vermin.

### Officer Response

This representation highlights how farm buildings are far from uniform in their size and design requirements, with different considerations likely to apply to livestock buildings, grain, straw or potato stores, etc. Para 5.1 could usefully be amended to recognise these practical dimensions. As the individual points on building form, materials, finishes, etc, are not intended to be prescriptive, no further detailed amendments are needed. The respondent refers to a previous experience with a farm building proposal, but no details are given, and it would in any case be unwise to draw general conclusions from one individual case.

Rec: Add new sentences at start of para 5.1 as set out in response to other representations.



We think that this will disadvantage the bigger farms, people who wish to change their farming system or those who have the chance to expand their farms in future such as more land available or a neighbouring unit becomes available but the buildings are out dated. Also the extra cost will make it even more difficult for young farmers to climb the farming ladder.

**Officer Response**

Officers would not accept that the form and structure of the SPG disadvantages farmers seeking to change their farming system or to acquire additional land or farms, or indeed younger farmers. Rather, the guidance provides assistance for all farmers in planning new developments. The insertion of specific reference to such circumstances in para 2.2, along with complementary changes in response to other representations should reassure the respondent on this point.

Rec: Amend 1st sentence of para 2.2 to read "Changes in farming practices and systems, the requirements of new environmental, hygiene and animal welfare legislation have created a demand for new and larger buildings".

Amend first sentence in 3.1 to read "A constructive approach towards agricultural development proposals is proposed."

I do not think people will object to a certain amount of landscaping such as tree planting, which is very effective but the PCNP must realise the it will take some time to establish a visual screen and planners need to take a long term view on the matter.

We hope these view will be given consideration within the consultation.

**Officer Response**

The comments are noted, and officers would confirm that the NPA looks at planting as a long term consideration, with Section 6 offering further advice on planting principles.

Rec: No change required.

EIA if the area of the development exceeds 0.5 hectare, as outlined in the EIA Regulations (see **Table 10.2**).

- 3.11 If the solar installation produces **over 5MW** it must have an Environmental Impact Assessment (EIA), to support the planning application, in order to meet the requirements of the Electricity Act 1989. More information on EIA requirements is provided in **Section 11**.

### **Choosing a suitable site within the National Park**

- 3.12 In general, the favoured sites for field-scale solar PV installations are plateaux tops / flat land or gentle slopes with a southerly aspect to maximise efficiency. From a landscape impact and logistical point of view, steep slopes should be avoided.

**3.13** The capacity of power lines running close to the site is also an important consideration. 11kV lines can support installation of a solar array with an output of 2 or 2.5 MW, while 33kV lines could support a solar array which generates up to 5MW or more. It is also important to check the proximity of the nearest electricity substation, to which the solar panels will be connected.

**3.14** Another consideration for site selection is the proximity of the railway network. The provision of any reflective material used on the panels should not interfere with the line of sight of train drivers (for public safety reasons). In addition, the potential for glare or reflection of light from the panels that may impact upon signalling should be explored and eliminated. Similarly, the impact of the siting of solar panels, particularly in terms of their reflectivity, should be considered in relation to views from the sea and the impacts that may have on sea users (e.g. for fishing, tourism and other commercial activities).

**3.13.15** The cumulative effect of multiple schemes should be taken into account, particularly as they tend to cluster around grid connection points.

**3.14.16** The need to protect the high quality coastal landscape of the Pembrokeshire Coast National Park, limits locations suitable for the installation of field-scale solar PV developments. In March 2011, an assessment of landscape sensitivity to field-scale solar PV was completed on behalf of Pembrokeshire Coast National Park Authority. This used the Landscape Character Assessment of Pembrokeshire Coast National Park<sup>14</sup> as a base. This divides the landscape of the National Park into 28 unique Landscape Character Areas (LCAs) each with its own distinct landscape character. The sensitivity of each Landscape Character Area to different scales of solar PV installation is indicated in **Figure 3.1 – 3.4** while **Annex I** provides a commentary on these sensitivities and guidance on where and how solar PV developments can be accommodated within the National Park.

**3.15.17** To use this information, identify the location of interest and relevant LCA using **Figure 3.1 – 3.4** and review the sensitivity description and guidance provided in **Annex I** where separate information is provided for each LCA.<sup>15</sup>

<sup>14</sup> Pembrokeshire Coast National Park Authority/John Campion Associates (2009).  
[www.pembrokeshirecoast.org.uk/Files/Files/dev%20plans/LCA%20Introduction%20FINAL%20June%202009.pdf](http://www.pembrokeshirecoast.org.uk/Files/Files/dev%20plans/LCA%20Introduction%20FINAL%20June%202009.pdf)

## Key landscape sensitivities and general guidance for siting field-scale solar installations within the National Park

Field-scale solar PV installations can occupy substantial areas of ground which may be visible (particularly where sites are able to be viewed from adjacent higher ground). Key landscape effects of field-scale solar PV developments are that they may:

- Be highly visible in open landscapes and on the upper slopes of hillsides, especially where covering significant areas.
- Lead to a perceived increase in human influence on the landscape.
- Result in a change in land use and in the appearance of a field or fields, affecting land cover patterns.
- Introduce a regular edge (to the panels) that can be particularly conspicuous in more irregular landscapes (especially where the panels do not follow contours).
- ‘Overtop’ hedgerows where panel heights rise to 3-4m, potentially reducing the visual prominence of field boundaries – this will be a particular issue where a number of adjacent small fields are developed.
- Change the character of enclosure with security fencing and screen planting (including hedges allowed to grow out) around solar PV developments.
- Damage landscape features during construction.
- Result in a significant change in the character of wild or natural landscapes which are valued for their high nature conservation value and qualities of remoteness.
- Introduce ancillary buildings that can be uncharacteristic in more wild and open landscapes.

3.163.18 **Annex I** provides guidance on the location and siting of field-scale photovoltaic developments. A checklist of the main factors to be taken into account in the siting of field-scale photovoltaics is provided below:

- Locate any development back from the coastal edge ~~-(at least one field back)-~~ so that it does not detract from the relative remoteness, drama and natural character of the coastline, maintaining its open and exposed character.
- Consider views along and to the coast, from local viewpoints, and from popular tourist and scenic routes (including The Pembrokeshire Coast Path and other rights of way). Avoid locating solar PV developments where they could be directly overlooked at close quarters from important or sensitive viewpoints.
- Maintain uninterrupted views from the coast to the internal landscape to preserve its remote and strong cultural and historic sense of place.
- Site solar PV development on flat landforms or on lower slopes/within folds in gently undulating lowland landscapes rather than on prominent upland landforms, highly visible slopes, or coastal headlands.
- Ensure PV developments do not span across different landscape types, such as across upland-lowland transitions.

## LCA 9: MARLOES

Landscape attribute	Sensitivity				
<b>Overview</b>	Although the rolling nature of this landscape and presence of arable land could indicate reduced sensitivity to solar PV development the predominantly open nature of the landscape, presence of important historic features, internationally important habitats and naturalistic coastal edge all increase levels of sensitivity to solar PV development.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large scale solar PV					
Medium scale solar PV					
Small scale solar PV					
Very small scale solar PV					
<b>Key sensitivities</b>	<ul style="list-style-type: none"> <li>• The strong rural character.</li> <li>• Patchwork of small to medium scale regular shaped fields.</li> <li>• Heathland and shoreline habitats of international importance and wetland habitats at Marloes Mere.</li> <li>• The naturalistic character of the coastal edge.</li> <li>• Important historic features and cultural landscapes, including the prehistoric sites and monuments, medieval features and Monk Haven parkland and the features specifically associated with The Milford Haven Waterway Registered Landscape of Outstanding Historical Interest in Wales.</li> <li>• Coastal views, including to Skomer and Skokholm islands, <a href="#">as well as views back to this section of coast from Skomer and Skokholm.</a></li> </ul>				
<b>Guidance</b>	<ul style="list-style-type: none"> <li>• The presence of small to medium scale fields means that the landscape is likely to be particularly sensitive to ‘medium’ and ‘large’ scales of solar PV development.</li> <li>• The importance of the undeveloped coastal edge with cliffs to north and west and the estuarine shore of Milford Haven requires that all scales of PV development are sited at least one field back from the coastal edge to retain the strong cultural association between land and sea.</li> <li>• Maintain the heathy / scrubby character of the landscape especially along the southern coastal edge.</li> <li>• Do not site PV development in areas free from disturbance and with a high degree of perceived naturalness (particularly on and around St Ann’s Head).</li> <li>• Maintain the patchwork landscape pattern.</li> <li>• Site PV development on flat landforms or on lower slopes/within folds in the rolling lowland landscape favouring flat landforms and lower slopes, while avoiding prominent landforms, highly visible slopes, or coastal headlands.</li> <li>• Site PV developments in areas of existing enclosure provided by woodland, hedgebanks or high hedges rather than in open and unenclosed landscapes.</li> <li>• Avoid siting PV development across adjacent multiple fields where this will mask the field pattern.</li> <li>• Maintain uninterrupted views along the coast and from the Pembrokeshire Coast Path to <a href="#">and from</a> the Islands, St Bride’s Bay and over Milford Haven to the Angle Peninsular.</li> <li>• Protect historic and archaeological sites and their setting, including prehistoric sites and monuments, and Medieval features and the features associated with the Milford Haven Waterway Registered Landscape of Outstanding Historical Interest in Wales.</li> </ul>				

	<ul style="list-style-type: none"><li>• Avoid affecting internationally important heathland, shoreline habitats and Marloes Mere and associated wildlife.</li></ul>
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## LCA 10: SKOMER AND SKOKHOLM

Landscape attribute	Sensitivity				
<b>Overview</b>	Although the flat nature of the islands may indicate reduced sensitivity to solar PV development, its predominantly semi-natural coastal grassland landcover, lack of enclosure, undisturbed qualities, important historic and cultural heritage, and very strong relationship with the sea all increase levels of sensitivity to solar PV development.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large scale solar PV					
Medium scale solar PV					
Small scale solar PV					
Very small scale solar PV					
<b>Key sensitivities</b>	<ul style="list-style-type: none"> <li>• Naturalistic landscape with semi-natural maritime grassland the dominant land cover.</li> <li>• Open and exposed character with panoramic sea views.</li> <li>• Absence of human disturbance.</li> <li>• Internationally important colonies of sea birds and natural habitats.</li> <li>• Internationally significant archaeological remains, including prehistoric agricultural and settlement features.</li> <li>• Constant relationship between the islands and the sea.</li> </ul>				
<b>Guidance</b>	This area is assessed as having a high sensitivity to any size and scale of solar PV development and therefore no guidance has been included.				

## LCA 12: ST BRIDE'S BAY

Landscape attribute	Sensitivity				
<b>Overview</b>	Although the rolling lowland nature of the landscape may indicate reduced sensitivity to solar PV development, its predominantly pastoral land use, open and exposed character, important views, presence of important historical features, internationally important habitats and it's strong visual relationship with the sea all increase levels of sensitivity to solar PV development.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large scale solar PV					
Medium scale solar PV					
Small scale solar PV					
Very small scale solar PV					
<b>Key sensitivities</b>	<ul style="list-style-type: none"> <li>• Open and exposed character of the coastal edge.</li> <li>• Semi-natural habitats, particularly on the coast and flood plain areas - heath, grassland (including marshy grassland and reed bed on floodplains), deciduous woodland, scrub</li> <li>• Varied pattern of small-medium scale fields of differing shapes.</li> <li>• Generally low hedgerows and hedgebanks and high visibility across the landscape</li> <li>• Extensive views along the coastline and across St Bride's Bay.</li> <li>• Archaeological features, particularly pre-historic sites, monuments and relic lime kilns.</li> <li>• <u>The prominent Grade I listed thirteenth century Roch Castle.</u></li> <li>• Close visual relationship between land and sea.</li> </ul>				
<b>Guidance</b>	<ul style="list-style-type: none"> <li>• The presence of a varied pattern of small-medium scale irregular fields and internationally important habitats means that the landscape is likely to be particularly sensitive to 'medium' and 'large' scale solar PV developments. Areas of small fields will be sensitive to all but the very smallest scale of PV development.</li> <li>• The strong relationship between the coastline and the internal landscape means that the coastal edge is sensitive to all scales of PV development, requiring that developments are sited at least one field back from the coast to maintain uninterrupted views along the coastline and St Bride's Bay.</li> <li>• Avoid all scales of PV development in areas of very small fields.</li> <li>• More generally do not allow PV development to mask the field pattern with development across multiple fields.</li> <li>• Use folds in the landform to screen PV development from public vantage points including rights of way, favouring sites on flat landforms and lower slopes, while avoiding prominent landforms, highly visible slopes, or coastal headlands.</li> <li>• Avoid development in the more remote and tranquil parts of this LCA.</li> <li>• Site development in areas with a sense of enclosure with existing screening by hedges</li> <li>• <u>Protect important historical and archaeological sites and their setting, including Roch Castle.</u></li> <li>• Avoid affecting areas of habitat including coastal heath, floodplain grassland, reedbeds.</li> <li>• <u>Ensure PV development does not intrude on views to and along the coast and from local viewpoints (including the higher viewpoints of Ryndaston and Cuffern Mountains), popular tourist and scenic routes such as the Pembrokeshire Coast Path, and rights of way. Avoid locating PV development where it would be directly overlooked at close quarters by important or sensitive viewpoints. Ensure PV development does not intrude on views along the coast and from local viewpoints, popular tourist and scenic routes (including the Pembrokeshire Coast Path) and</u></li> </ul>				

	<p><del>rights-of-way. Avoid locating PV development where it would be directly overlooked at close quarters by important or sensitive viewpoints.</del></p>
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### LCA 13: BRANDY BROOK

Landscape attribute	Sensitivity				
<b>Overview</b>	Although the presence of hedgebanks and hedgerow trees contribute to a sense of enclosure and may indicate reduced sensitivity to solar PV development, the steep sided valleys, irregular field pattern of medium scale fields, predominantly pastoral landcover, areas of semi-natural landcover and sparse settlement all increase levels of sensitivity to solar PV development.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large scale solar PV					
Medium scale solar PV					
Small scale solar PV					
Very small scale solar PV					
<b>Key sensitivities</b>	<ul style="list-style-type: none"> <li>• The predominantly pastoral character and irregular field pattern.</li> <li>• The small scale, steep sided valley system.</li> <li>• The high sense of naturalness – including the presence of large areas of riparian, heathland and woodland habitats.</li> <li>• An intimate, sheltered, peaceful landscape</li> <li>• Important prehistoric remains- <u>and views to the prominent 13<sup>th</sup> century Roch Castle.</u></li> </ul>				
<b>Guidance</b>	<ul style="list-style-type: none"> <li>• The irregular pattern of medium scale fields and steep sided valleys means that the landscape will be particularly sensitive to 'large' and 'medium' scale PV developments. Areas of particularly small scale fields would also be sensitive to 'small' scale developments.</li> <li>• Site solar PV development on flat landforms or on lower slopes/within folds in gently rolling lowland rather than on prominent upland landforms or highly visible slopes.</li> <li>• Use existing woodland (and potentially small woodland extensions) and the existing pattern of hedges and hedgebanks to screen PV developments from public vantage points including the rights of way network.</li> <li>• Avoid siting PV developments in the most secluded and peaceful parts of this LCA.</li> <li>• Avoid siting PV development across multiple fields in areas of small scale irregular fields where this will mask the field pattern.</li> <li>• Ensure that PV developments do not intrude on important views from public view points and rights of way especially to Roch Castle <u>(and its setting)</u>, St David's headland and across St Bride's Bay.</li> <li>• Avoid affecting areas of existing woodland and the diverse habitats of the river valleys and the species they support.</li> <li>• Protect valued prehistoric and other historic features ad their remains.</li> </ul>				

## LCA 14: SOLVA VALLEY

Landscape attribute	Sensitivity				
<b>Overview</b>	Although the high concentration of woodland and some high hedgerows contribute to a sense of enclosure and may indicate reduced sensitivity to solar PV development, the irregular pattern of small to medium scale fields, presence of large areas of pasture, dominance of woodland on valley sides, internationally important valley habitats and outstanding historic value all increase levels of sensitivity to solar PV development.				
	<b>Low</b>	<b>Low-Moderate</b>	<b>Moderate</b>	<b>Moderate-High</b>	<b>High</b>
Large scale solar PV					
Medium scale solar PV					
Small scale solar PV					
Very small scale solar PV					
<b>Key sensitivities</b>	<ul style="list-style-type: none"> <li>• The small scale of the valley and pattern of irregular small to medium sized fields, with the exception of large fields on the plateau top.</li> <li>• The semi-natural habitats including internationally important heathland habitats along the valley floor.</li> <li>• Extensive woodland cover on valley sides</li> <li>• Solva’s historic sense of place and Conservation Area status (which covers much of this LCA).</li> <li>• Outstanding historic and archaeological features, particularly lime kilns by Solva harbour.</li> </ul>				
<b>Guidance</b>	<ul style="list-style-type: none"> <li>• The irregular pattern of small-medium scale fields, internationally important valley habitats, the Solva Conservation Area, and considerable tracts of semi-natural landcover mean that much of the landscape is sensitive to PV developments of all scales, especially to ‘medium’ and ‘large’ scale PV developments.</li> <li>• Site solar PV development on flat plateau landforms with larger fields.</li> <li>• Avoid all scales of PV development in any small fields of medieval origin and of particular historic significance.</li> <li>• More generally do not allow PV development to mask the field pattern with development across multiple fields.</li> <li>• Avoid locating solar PV development where it would be directly overlooked at close quarters by important or sensitive viewpoints or where it would be evident in important views.</li> <li>• Avoid affecting areas of semi-natural habitats (including woodland) and the species they support, especially the internationally important valley habitats.</li> <li>• Ensure solar PV developments do not affect Solva’s historic sense of place and special historic, cultural and architectural interest (as recognised by its Conservation Area status) and important historic and archaeological features, (e.g. the lime kilns <a href="#">and Iron Age hillfort</a> at Solva).</li> </ul>				

## LCA 15: DOWROG & TRETIO COMMONS

Landscape attribute	Sensitivity				
<b>Overview</b>	Although the gently undulating nature of this landscape and the presence of some larger fields could indicate reduced sensitivity to solar PV development, it's open exposed character, expanse of semi-natural landcover, internationally important habitats, valued historic features and undeveloped nature all increase levels of sensitivity to solar PV development.				
	<b>Low</b>	<b>Low-Moderate</b>	<b>Moderate</b>	<b>Moderate-High</b>	<b>High</b>
Large scale solar PV					
Medium scale solar PV					
Small scale solar PV					
Very small scale solar PV					
<b>Key sensitivities</b>	<ul style="list-style-type: none"> <li>• It's open, exposed character.</li> <li>• The large areas of natural common land, including heathland and grassland habitats of international importance.</li> <li>• The area's strong historic and cultural sense of place, as reflected in the Conservation Area status of Caerfarchell and its inclusion in the wider St David's Headland &amp; Ramsey Island Registered Landscape of Outstanding Historic Importance.</li> <li>• The presence of prehistoric and early Christian sites and monuments of national importance.</li> </ul>				
<b>Guidance</b>	<ul style="list-style-type: none"> <li>• The lack of enclosure and presence of expansive tracts of semi-natural landcover, and some smaller irregular fields means that the landscape is particularly sensitive to 'medium' and 'large' scale solar PV developments.</li> <li>• No development should occur on the open common land with its mosaic of wet and dry heathland, marshy grassland and purple moor grass of international importance or on land immediately visible from the common land.</li> <li>• Ensure that PV development does not affect the prehistoric significance of this landscape or the value of the St David's Headland &amp; Ramsey Island Registered Historic Landscape of Outstanding Historical Interest in Wales that covers significant areas of this LCA.</li> <li>• Ensure that PV development does not affect the character and setting of the Caerfarchell Conservation Area</li> <li>• Avoid all scales of PV development in small fields of medieval origin and of particular historic significance.</li> <li>• More generally do not allow PV development to mask the field pattern with development across multiple fields.</li> <li>• Site solar PV development within folds in this gently undulating landscape as a means of minimising the impact of development on the wider landscape in this open and exposed landscape with low hedgerows and limited woodland.</li> <li>• Ensure that PV development does not intrude on key views to <u>and from</u> the Carn Llidi Mountains.</li> </ul>				

## LCA 18: ST DAVID’S HEADLAND

Landscape attribute	Sensitivity				
<b>Overview</b>	Although the rolling nature of this landscape could indicate reduced sensitivity to solar PV development, the irregular pattern of small-medium scale fields, considerable amounts of pasture, it’s open and exposed nature, valued semi-natural habitats and outstanding historic and cultural heritage all increase levels of sensitivity to solar PV development.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large scale solar PV					
Medium scale solar PV					
Small scale solar PV					
Very small scale solar PV					
<b>Key sensitivities</b>	<ul style="list-style-type: none"> <li>• Its open character particularly along the coast and on the headland.</li> <li>• Its predominantly pastoral land use with lack of woodland or other tall vegetation.</li> <li>• The presence of large tracts of semi-natural habitat including heathland, wetlands and rough grassland of international importance.</li> <li>• Pattern of irregular small-medium scale fields.</li> <li>• Extensive unspoilt views along the open coastline.</li> <li>• Outstanding historic and cultural value, including prehistoric features such as the Clegyr Boia Neolithic settlement and early Christian sites.</li> <li>• Strong associations with the cathedral city of St. David’s</li> </ul>				
<b>Guidance</b>	<ul style="list-style-type: none"> <li>• The pattern of irregular small-medium scale fields, lack of enclosure and large-swathes of internationally important semi-natural habitats means that the landscape is particularly sensitive to ‘small’, ‘medium’ and ‘large’ scale solar PV developments.</li> <li>• The natural and highly visible coastal edge is sensitive to all scales of PV development requiring that any PV developments are sited well back from the coast so that they do not detract from its remote and strong cultural sense of place.</li> <li>• No development should occur on the open swathes of lowland heathlands, wetlands and semi-natural grasslands of international importance.</li> <li>• Ensure that PV development does not affect the historic and cultural features and associations of the St. David’s Headland and Ramsey Island Registered Landscape of Outstanding Historical Interest in Wales with its extensive and well-preserved evidence of land use and intense ritual and religious activity from the prehistoric period onwards. Equally conserve the setting of Clegyr Boia, the only Pembrokeshire example of a Neolithic domestic settlement</li> <li>• Avoid all scales of PV development in areas of very small fields.</li> <li>• More generally do not allow PV development to mask the field pattern with development across multiple fields.</li> <li>• Use folds in the landform to screen PV development from public vantage points including rights of way, favouring sites on flat landforms and lower slopes, while avoiding prominent landforms, highly visible slopes, or coastal headlands.</li> <li>• Avoid development in the more remote and tranquil parts of this LCA.</li> <li>• Protect views along the coastline from the Pembrokeshire Coast Path, other rights of way and public vantage points to <u>and from</u> Ramsey Island and south across St Bride’s Bay and the Marloes coastline and to the Carn Llidi hills and</li> </ul>				

	inland to St David's Cathedral. Avoid locations where PV developments would be directly overlooked at close quarters by important or sensitive viewpoints.
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## LCA 19: RAMSEY ISLAND

Landscape attribute	Sensitivity				
<b>Overview</b>	Although the flat nature of the islands may indicate reduced sensitivity to solar PV development, its large tracts of semi-natural landcover, lack of enclosure, undeveloped nature, rich diversity of habitats, valued historic and cultural heritage and very strong relationship with the sea all increase levels of sensitivity to solar PV development.				
	<b>Low</b>	<b>Low-Moderate</b>	<b>Moderate</b>	<b>Moderate-High</b>	<b>High</b>
Large scale solar PV					
Medium scale solar PV					
Small scale solar PV					
Very small scale solar PV					
<b>Key sensitivities</b>	<ul style="list-style-type: none"> <li>• Its open, exposed character and absence of human settlement.</li> <li>• The predominance of naturalistic landcover and highly valued wildlife habitats, including heathland and maritime cliffs, along with the presence of sea bird colonies.</li> <li>• The presence of internationally important archaeological and historic remains, including the medieval chapel and prehistoric round barrows.</li> <li>• Its highly valued wildlife habitats, including heathland and maritime cliffs, along with the presence of sea bird colonies.</li> </ul>				
<b>Guidance</b>	This area is assessed as having a high sensitivity to any size and scale of solar PV development, therefore no guidance has been included.				

## LCA 22: MYNYDD CARNINGLI

Landscape attribute	Sensitivity				
<b>Overview</b>	Although the large scale of the landscape could indicate reduced sensitivity to solar PV development the presence of small-scale irregular fields, extensive area of open, unenclosed moorland, predominance of pasture, highly valued range of historical features and internationally important semi-natural habitats all increase levels of sensitivity to solar PV development.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large scale solar PV					
Medium scale solar PV					
Small scale solar PV					
Very small scale solar PV					
<b>Key sensitivities</b>	<ul style="list-style-type: none"> <li>• Its open character with sparse vegetation cover and dominance of grazing as a land use.</li> <li>• <u>The strong feeling of remoteness and tranquillity with little human disturbance and lack of intrusive development.</u></li> <li>• <u>Extensive views across the surrounding landscapes.</u></li> <li>• Close proximity of the sea.</li> <li>• The wild and natural character with extensive areas of dry heathland, along with wet heath, marshy grassland, are internationally important semi-natural habitats.</li> <li>• The presence of nationally important archaeological features forming part of the Newport and Carningli Registered Landscape of Special Historical Interest in Wales.</li> </ul>				
<b>Guidance</b>	This area is assessed as having a high sensitivity to any scale of solar PV development and therefore no guidance has been included.				

**Pembrokeshire Coast National Park Authority**  
**Siting and Design of New Farm Buildings**

Supplementary Planning Guidance

To the Local Development Plan for the Pembrokeshire  
Coast National Park

Consultation Draft

October 2011

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## 1.0 Introduction

- 1.1 This supplementary planning guidance provides detailed advice on the siting and design of new farm buildings. It does not form part of the Local Development Plan, but when adopted will be a material consideration in whether proposals can receive planning permission.

## 2.0 Purpose of this guidance

- 2.1 ~~Agriculture is a key and strategically important industry within the national park, and has a central role in shaping management of its landscape. Agriculture has an essential role in shaping the countryside of the National Park.~~ It helps to maintain its special qualities including its diversity of landscape and cultural heritage. Farm buildings built of locally sourced materials such as rubble stone and slate provide local character. Farming maintains landscape features such as field patterns, traditional boundaries of hedgebanks or stone walls, trees, woodland and copses. The NPA supports the Welsh Assembly Government's objectives for a sustainable and profitable future for farming while safeguarding the environment and contributing to the vitality and prosperity of our rural communities. The NPA will adopt a constructive approach towards agricultural development proposals, and will foster a spirit of partnership with the farming community in pursuit of a sustainable future.
- 2.2 ~~Changes in farming practices and systems, the requirements of new environmental, hygiene and animal welfare legislation have created a demand for new and larger buildings. Changes in farming practice have created a demand for larger buildings in response to the need to comply with new environmental, hygiene or animal welfare legislation.~~ Modern farm buildings are generally larger than traditional buildings, and of single span, shallow roof construction to achieve the best economic and practical solution. Scale, materials and location however may not appropriately reflect local design tradition and may have an adverse landscape impact. A key requirement is to respect the character and Special Qualities of the National Park and to dovetail this with appropriate aspects of local design traditions to produce sustainable and suitable farm buildings.<sup>1</sup>
- 2.3 This guidance cannot cover all development on farms and does not refer to agricultural workers dwellings, farm diversification schemes or waste management such as anaerobic digestion plant<sup>2</sup>. Specific advice about these should be sought from the planning department using the pre-application service.

## 3.0 The Importance of Design

- 3.1 ~~A constructive approach towards agricultural development proposals is proposed. It is essential to support good farming practice by encouraging the provision of efficient buildings, but farm buildings must also be designed in a way that is sympathetic with their setting and not damaging to the National Park character or its landscape.~~

The main design considerations when planning a farm building should be –

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<sup>1</sup> See the Authority's guidance on Landscape Character Assessment for further information <http://www.pembrokeshirecoast.org.uk/default.asp?PID=249>

<sup>2</sup> See the Authority's guidance on Renewable Energy provides further information about this.

- **Achieving a cost-effective and operationally efficient building.**
- **Minimise impact on the local landscape, countryside and traditional buildings.** Consideration of the siting in the local landscape and in relation to existing traditional buildings, how to break up the bulk of a building, the construction materials, and landscaping and the scope for re-using existing buildings will all help to reduce the visual impact of a new farm building.
- **A sustainable design approach<sup>3</sup>.** Any development should incorporate sustainable design. Farm buildings can be well designed and contemporary as well as high quality buildings using the principles of intelligent siting, response to climate change and sustainably sourced local materials. Large spans can also present an opportunity for solar or photovoltaic panels to be incorporated<sup>4</sup>.

#### 4.0 Do I need Planning Permission?

- 4.1 All new farm buildings and structures fall within the scope of the planning system<sup>5</sup>, requiring either 'prior notification' or planning permission. The Local Planning Authority should be contacted at the earliest opportunity, using the pre-application enquiry process<sup>6</sup> for advice about consents that will be needed and the type of development that is likely to gain permission. Some works, such as internal alterations to a building don't require planning permission. Appendix 1 provides some general guidance about whether planning permission is required for agricultural buildings.

##### Other Regulations

- 4.2 Other regulations may also be applicable to agricultural development, including Environmental Impact Assessment for intensive agricultural use of uncultivated or semi-natural areas, water management (exceeding 1 hectare) or intensive livestock installations (new floorspace exceeding 500 square metres) may require Environmental Impact Assessment. The Environment Agency is also an important regulator of agriculture.

##### Local and National Planning Policy

- 4.3 National planning policy relating to agriculture is contained within Planning Policy Wales, Edition 4 (February 2011), and supplemented by further guidance in Technical Advice Note 6 – Planning for Sustainable Rural Communities July 2010<sup>7</sup>.

<sup>3</sup> The National Park Authority has adopted Sustainable Design Supplementary Planning Guidance, June 2011. It is available via our web site , or from the National Park Offices <http://www.pembrokeshirecoast.org.uk/default.asp?PID=183>

<sup>4</sup> Planning permission is required to put solar panels or photovoltaic panels on existing farm buildings or can be part of a planning application for a new farm building. Please see the Addendum to the Renewable Energy Supplementary Planning Guidance for further information on solar panels.

**Insert weblink when ready**

<sup>5</sup> In addition, farmers should take into account all relevant agricultural BSI British Standards and codes of good agricultural practice for soil, air and water protection and any other relevant regulations.

<sup>6</sup> See <http://www.pembrokeshirecoast.org.uk/default.asp?PID=282> for pre-application forms

<sup>7</sup> See <http://wales.gov.uk/topics/planning/policy/tans/?lang=en>

- 4.4 The Pembrokeshire Coast National Park Local Development Plan, September 2010, contains policies which are relevant to proposals for farm buildings. These include Policy 1 'National Park Purposes and Duty'; Policy 7 'Countryside'; Policy 8 'Special Qualities', Policy 15 'Conservation of the Pembrokeshire Coast National Park'; Policy 29 Sustainable Design; and Policy 30 Amenity.

In addition, the National Park Authority has produced supplementary planning guidance on Sustainable Design and on Renewable Energy<sup>8</sup> which may be relevant to farm building proposals.

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<sup>8</sup> Visit <http://www.pembrokeshirecoast.org.uk/default.asp?PID=183> for the Sustainable Design or Renewable Energy SPGs. They can also be obtained from the National Park Office at Pembroke Dock.

## 5.0 Design Guidelines

- 5.1 The design guidance set out in the following sections is not intended to be prescriptive, but rather to help shape schemes that meet the farmers' needs and are in harmony with their surroundings. What will be appropriate in a particular case will depend on the nature of the individual proposals and the site circumstances. Buildings for livestock housing, for example, will raise different issues to those for storing grain, straw or potatoes. As a result of technological advances in both the farming and building industries, new farm buildings tend to be larger than traditional farm buildings and make use of more varied construction materials. It is important that they continue to integrate with the landscape and have positive impacts on biodiversity and habitats, pollution control, the historic and cultural environment and relate well to existing buildings.

### Siting

- 5.2 Preference should be given to new buildings which sit within or are well related to existing building complexes, since the existing development can help to provide a context which is less intrusive than new isolated development. However, it is recognised that such siting is not always appropriate, for operational, pollution control or other practical reasons.~~New buildings should sit with existing farm complexes, the existing development can help to give a built context and is less intrusive than new isolated development.~~ It may also be possible to integrate with or extend existing buildings. Practical considerations include ease of access for machinery, vehicles and livestock; shelter; sun/shade requirements; security and drainage needs. In addition, the following advice should help to lessen the building's impact on the landscape:

- avoid prominent sites including those near to public highways and public rights of way;
- where possible site the building below the skyline;
- use existing or new planted vegetation to screen the building or to soften its appearance;
- use the building as an opportunity to screen any existing unattractive buildings;
- avoid siting near to residential properties unconnected with the farm. Potential smell and noise should be taken into account;
- where possible site new buildings parallel or at right angles to existing buildings;
- avoid removing or concealing features of interest such as ponds, trees, hedges or traditional walls and buildings;



Plate 1 : Sited below the skyline, this complex uses a variety of roof shapes. The addition of planting on the hedgebank to the front of buildings would grow up to screen the buildings.

5.3 ~~Wherever possible~~ when planning a new building, ~~the landscape enhancement opportunities may arise should be taken through~~ rationalisation of the use of existing buildings on the farmstead ~~and or to by~~ removing buildings of particularly poor appearance or those in a poor state of repair (providing they have no historic merit).

5.4 A building on the skyline will break the natural line between the sky and land, and will tend to dominate the landscape and be intrusive. In most cases this can be avoided. Siting below the skyline considerably reduces the potential intrusion of modern farm buildings into the landscape. Where this is not possible careful attention should be given to the design, size, outline, reflectivity of materials and colour of the building and its relationship with the contours of the land. The outlines of the building should be interesting and well balanced in proportion. The distant views of buildings in this situation are particularly important.

### **Topography**

5.5 The relationship of a building to the contours of the land is fundamental to its overall appearance. Traditional farm buildings often seem to grow out of the land, partly because they were built of traditional local building materials but partly because the builders shaped each building to fit the site. With larger new buildings this is not quite so easy to achieve. However through careful siting the lines of a building can sit against the landscape backdrop and can hug the sweep of the land closely. A sloping site, although it may seem more difficult to develop, should not be ignored as it may have several advantages:

- Setting a building into a slope will minimise its impact on the landscape and will help it to merge into its surroundings.
- The slope can give shelter and a warm aspect.
- A sloping site may be less productive agricultural land.
- The spoil from excavation can often be used to reduce the apparent height of the building through sensitive ground shaping through the creation of banks and mounds.

5.6 Cut and fill can be the best method of providing a level building site on a steep slope and of setting a building into the landscape. Appearance will be improved by keeping the cut and fill to a minimum. In addition, “stepped” buildings can produce interesting roof patterns. Extensive cut and fill can however result in large expanses of unattractive retaining walls and bare slopes and should be avoided. Taking advantage of a sloping site can result in improvements to the form of buildings

Insert Brian's illustration

Plate 2 : two sheds into sloping ground

### **Form and Design**

5.7 Modern farm buildings need to be carefully designed. Large single span buildings can potentially cause the greatest visual impact.

Consideration should be given to:

- using multi-span structures which reduce the bulkiness of the roof and enable the gable elevation to be in more than one plane;
- varying the standard rectangular plan;
- breaking up large flat expanses of walls by using materials of a different colour and texture (e.g. stone below timber cladding, timber doors, etc.);
- using different coloured materials for the walls and roof;
- good construction detailing;
- dividing the building into two smaller ones which can then be more easily incorporated into an existing group.

5.8 The type and colour and texture of external construction materials will greatly affect the impact the building has on the landscape. (Breeze block walls for example can be of relatively poor appearance and are not considered appropriate in sensitive or prominent locations, although account will be taken of the justification for choosing this form of construction).



Plate 2 : Variety of spans and design can add interest.

### **Type of Material**

- 5.9 Traditional local stone is a material which blends well with the rural environment. They can be used to good effect as a plinth to a portal framed and timber clad building.
- 5.10 Concrete blocks or insitu concrete or natural grey blocks if a high quality can have an acceptable appearance, provided they are not used extensively on exposed elevations. Rendering of concrete or block work is generally acceptable.
- 5.11 The use of concrete materials as a plinth, not exceeding one third of the height of the building, with cladding at the higher level, may be acceptable in many circumstances. Cladding can where appropriate be timber, stone or corrugation.
- 5.12 Vertical timber boarding remains a popular cladding material, in particular for livestock buildings, and usually blends successfully with traditional buildings. Horizontal boarding can also be acceptable. Preservative treatments can have acceptable colours.

Plywood, blockboard, hardboard and similar sheeted timber materials are generally visually unsatisfactory, and are unacceptable.

- 5.13 Plastic coated metal sheeting can have a good appearance if a suitable colour is chosen. It requires no maintenance, has an extremely long life, erection is simple and the sheets can be re-used. It is available in a range of suitable colours and profiles. As a general rule, the bigger the building, the bigger should be the profile (i.e. the distance between the corrugation which gives the ripple appearance). For smaller buildings traditional rounded corrugation is appropriate.
- 5.14 Self-coloured fibre cement sheets are available in natural or coloured finish. Although it is relatively inexpensive and easy to maintain, its practical drawback is its brittleness, which makes re-use difficult and damage likely if used at ground level. A coloured finish is strongly recommended as the natural finish takes a long time to weather and can be unduly prominent.
- 5.15 Bitumen and mineral fibre board is a lightweight corrugated cladding material which can be used on flat or curved surfaces and is available ready coloured. It has a relatively short life expectancy of around 25 years. It is normally only suitable for use on irregularly shaped or temporary buildings.
- 5.16 Corrugated steel sheeting was traditionally used for many farm buildings and was usually painted to maintain its appearance. Other options include plastic coated or coloured fibre cement sheeting and will normally be acceptable.

### **Colour of Material**

- 5.17 The use of appropriate colour is very important when trying to make the building fit into its surroundings. Dark colours have less visual impact. Most materials come in a range of colours and the following general advice is given:
- use dark matt finishes on roofs and walls such as brown, dark green, black or dark grey which blend well with the landscape and a building will appear to be smaller;
  - choose a darker colour for the roof – the roof reflects more daylight than the walls and so will appear lighter if coloured the same as the walls.
  - avoid a large expanse of a single colour for walls – a blend of materials or shades can be preferable;
  - colour-coated sheets are preferable to some through-colour pigmented sheets, as they give a more even and long-lasting results.





Plate 3: A variety of materials and colours can be acceptable.

5.18 The precise choice of colour will depend on local surroundings, including the colour of any adjacent buildings. The existence of inappropriately coloured buildings nearby will not be acceptable justification for a poor choice of colour or materials.





Plate 4 : Colour choices and scale can help buildings blend with the traditional

### **Construction Details**

- 5.19 As farm buildings often consist of large expanses of flat surfaces, good detailing can greatly enhance their appearance. Detailing worthy of consideration include eaves, rooflights, gutters, rainwater pipes, doors, windows and ventilation units. Prominent or sensitive locations are likely to require close attention to detail.

In sensitive locations the following can improve the appearance of the building:

- the apparent scale of the building will be reduced if the roof overhangs the walls, as an horizontal shadow line is created (natural ventilation will also be improved);
  - gutters and rainwater pipes can be important design elements and care should be taken to ensure that they cannot be damaged by livestock and farm machinery;
  - doors, windows and ventilation units should be in proportion to the whole building.
- 5.20 Problems often arise with large doors, particularly on gable ends. The upper corners of the door openings and the 'runners' should be kept well away from the roof to improve appearance. An industrial appearance to doors should be avoided.

## **6 Landscaping**

- 6.1 Tree planting and natural boundary treatments will often be required to integrate and help blend new farm buildings into the landscape. It will also provide protection from strong winds and habitat for wildlife. The need for tree planting will be influenced by the scale and prominence of the building and the adequacy of any existing trees or planting which screens the building from main viewpoints. Careful siting and choice of materials may reduce the need for tree planting. In prior notification cases, if the building is likely to have a significant impact on its surroundings, landscaping may be essential if other

ways of reducing the impact cannot be found. Landscaping will always be a matter for detailed consideration for developments which require planning permission. Artificial bunds even when planted can look out of place and should be avoided.

- 6.2 Submitted planting schemes should consider:
- planting in groups and not in evenly spaced rows, unless in shelter belts;
  - choosing species which do well locally and are native to the area;
  - planting some distance away to protect sensitive viewpoints.
  - the risk of damage to buildings from falling branches, gutters becoming blocked with leaves or root damage to foundations;
- 6.3 Planting requirements will normally be the subject of conditions imposed on planning permissions or on approval of details submitted under the prior notification procedure. These will normally cover the means of protection for existing landscape features within the site, the carrying out of the planting within a specified timescale and future maintenance responsibilities. New trees should be protected from rabbits and stock by appropriate fencing. Maintenance conditions will include a requirement to replant any trees which fail to survive for five years.
- 6.4 The Authority has produced a list of native trees and shrubs which occur naturally within the National Park to assist and is available on the Authority's website<sup>9</sup>. Advice is also available from the Authority's Tree and Landscape Officer.

## 7.0 Extensions to Existing Buildings

- 7.1 Similar considerations will apply to extensions as to new buildings. Consideration should also be given to the visual benefits of an extension that is subservient (smaller in scale) to the original building and that matches it in design and materials. ~~These should be subservient i.e. smaller in scale than the original building. Normally, the design and choice of materials will be determined by the need to match the existing as closely as possible. However, an alternative solution may be best, particularly where the appearance of the existing building is poor and the proposed extension would be prominent. However, where the appearance of the existing building is poor and the proposed extension would be prominent an alternative solution may be best.~~ Suggestions may include the construction of a separate building and physical works or landscaping to improve the appearance of the existing building.

## 8.0 Access Roads

- 8.1 Existing access roads should be used where at all possible. Extensions to existing access roads or new access roads to farm buildings can have a significant impact on the countryside, particularly where the land is undulating or features of interest are removed. <sup>10</sup>Junctions of new farm roads and public roads will have to satisfy the requirements of the Highway Authority, who may request an alternative siting or specification, for reasons of highway safety or maintenance;
- 8.2 New or extended existing access roads should:

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<sup>9</sup> <http://www.pembrokeshirecoast.org.uk/files/files/dev%20plans/AdoptedSPG/NativeTreesShrubs2011.pdf>

<sup>10</sup> Planning permission may be required for making or altering access roads.

- avoid causing harm to features of interest, such as trees and woodland, ponds, the settings of listed buildings or ancient monuments, etc.;
- follow established field boundaries or contours;
- consider the impact on any neighbouring dwellings not connected with the farm;
- take into account public rights of way (such as public footpaths, bridleways, restricted byways and byways and their users, advice should be sought from the public rights of way section before any changes are made to the surface of any public right of way;
- consider dark surfacing as tarmac or crushed aggregate can be less noticeable in the landscape. Any hard surfacing of a bridleway running along an access road requires prior consultation and consent of the public rights of way team;
- consider whether new tree planting or hedge banks are appropriate

## 9.0 Other Considerations<sup>11</sup>

There are a wide range of considerations which must be taken into account for any development, and these can be relevant to farm buildings. Each proposal can present different considerations. Pre-application advice can be provided.

- **Biodiversity (Habitats and Species)** the potential for protected species to be present, and for loss or damage to habitat must be considered. Effects on biodiversity of run-off and pollution, including air, water and soil pollution must be considered. Enhancements to biodiversity can be incorporated into many schemes, such as barn owl boxes and bat boxes

The effects on biodiversity can often be avoided, minimised or mitigated through careful siting and design. Appropriate management of feed stocks such as silage, and waste arising from any livestock that is housed within the buildings can assist. Technical advice should also be sought from the Environment Agency Wales about pollution<sup>12</sup>.

- **Effect on Historic landscape or buildings** Particular care should be taken when the development is within an historic landscape, or would impact on an historic park or garden. Potential impact on listed buildings and their settings, buildings of local importance and development within Conservation Areas should be taken into account along with the potential for archaeology and protected monuments and sites. -The need for Listed Building Consent should be considered where alterations to listed buildings are concerned. Every effort should be made to retain buildings which are of historic interest, seeking their repair and adaptation rather than removal.
- **Public Rights of Way** are highways and are protected by law in exactly the same manner as any other highway such as a High Street or dual carriageway. If a new building or associated works are likely to affect a public right of way, either crossing, adjacent to or being used as access this will be considered as part of the planning application process. Permission will not be granted for any development which would prejudice public access onto or through the PROW network unless specific arrangements are made for suitable alternative routes

<sup>11</sup> See Local Development Plan policies 10 and 11 for further information:

<http://www.pembrokeshirecoast.org.uk/default.asp?PID=178>

<sup>12</sup> <http://www.environment-agency.gov.uk>

which meet the legal tests. Please seek further advice from the public rights of way team.

- **Water Protection and Pollution Control** standards are required. The Environment Agency can provide advice about this.

## 10.0 Further Advice

Further advice is available from the Planning Department via the pre-application enquiry procedure. [Advice is also available on access, tree, building conservation and biodiversity matters.](#)

Please direct your planning enquiries to:

Development Management  
Pembrokeshire Coast National Park Authority  
Llanion Park  
Pembroke Dock  
Pembrokeshire  
SA72 6DY

Tel: 0845 3457275 Fax: 01646 689076 Email: [devman@pembrokeshirecoast.org.uk](mailto:devman@pembrokeshirecoast.org.uk)

## 11.0 Useful Contacts

**Pembrokeshire Coast National Park Authority** [www.pcnpa.org.uk](http://www.pcnpa.org.uk)

~~Access Officer~~ ~~Anthony Richards~~

~~Assistant Access Officer~~ ~~Theresa Nolan~~

~~Tree Officer~~ ~~Mike Higgins~~

~~Building Conservation Officer~~ ~~Rob Scourfield~~

**Environment Agency** [www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)

General Enquiries 03708 506 506

Incident Hotline (to report an incident including pollution) 0800 807060

Agricultural Waste registration 0845 603 3113

[Countryside Council for Wales](#)

[General Enquiries 01646 624000](#)

**Dyfed Archaeological Trust** [www.cambria.org.uk](http://www.cambria.org.uk)

Contact telephone 01555 823121

**Planning Aid Wales** [www.planningaidwales.org.uk](http://www.planningaidwales.org.uk)

Planning Aid Wales is an independent registered charity providing free impartial and professional advice on all aspects of planning in Wales. PAW provides a helpline service for eligible members of the public. Tel 02920 625000

## **APPENDIX 1 : Do I need planning permission or prior notification?**

This will depend on the size of the holding, whether a separate parcel of land is being used, and the development proposed.

### **Holding Under 5 hectares?**

On holdings of less than five hectares (or separate parcel of land of less than one hectare) the erection of any new agricultural building requires formal planning approval.

### **Holding ~~Over~~ of 5 hectares or more?**

On holdings over five hectares some agricultural buildings and other works could be permitted development. If the holding is more than five hectares, and **any** of the answers to the following questions is **YES**, then full planning permission is required. If **all** the answers are **NO**, then the Prior Notification Procedure applies.

Checklist :

- Is the farm holding less than five ha in area or the development to take place on a separate parcel of land less than one hectare? **YES/NO**
- Would it involve the provision of a building, structure or works not designed for agricultural purposes? **YES/NO**
- Would the ground area of the development exceed 465 sq metres? **YES/NO**
- Would the height of any part of any building, structure or works within three km of the perimeter of an aerodrome exceed three metres? **YES/NO**
- Would any part of the development be within 25 metres of a metalled part of a trunk or classified road? **YES/NO**
- Would the development be used for the accommodation of livestock or for the storage of slurry or sewage sludge, **YES/NO**
  - If yes, would it be within 400 metres of the curtilage of a protected building? **YES/NO**
- Would the development involve excavations or engineering operations connected with fish farming? **YES/NO**

### **The prior notification procedure can be described in two stages:**

- i. The farmer or developer is required to provide details of their proposal to the National Park Authority. This should be done by filling in the “prior notification” form and sending it to the Authority, along with the correct fee<sup>13</sup> and any supporting information. Twenty-eight days are allowed for the Authority to decide whether their approval is required; were the Authority to indicate that prior approval is not necessary (or fail to give a decision in twenty-eight day period), the work can proceed.
- ii. Progress to the second stage is dependent on whether or not the authority considers prior approval necessary. If this is the case, the farmer or developer is required to submit full details of the proposal, including siting, materials and external appearance. These will be subject to careful consideration by the Authority, who will aim to make a decision within eight weeks of receiving full details. During this period, the Authority may suggest amendments to make the proposal more acceptable.

In deciding whether or not the second stage (ii), i.e. prior approval of details is necessary, Officers will assess whether or not the proposed development is likely to have a significant impact on its surroundings. In making this judgement, regard will be had to:

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<sup>13</sup> Current fees can be found on our web site at <http://www.pembrokeshirecoast.org.uk/default.asp?pid=132>

- the visual impact of the proposal on the landscape or any potentially adverse effects it may have on conservation interests, such as sites of nature conservation value, listed buildings or ancient monuments and their setting, archaeological sites, conservation areas or areas subject to landscape policies;
- any relevant Local Development Plan policies;
- the design guidelines referred to in this document;
- National Planning Policy and consultation with relevant agencies.

Farmers are encouraged to submit as much detail as possible at the stage of initial notification and to follow the design guidelines set down in this guidance. Sketch elevations or trade literature on materials can be particularly helpful way of conveying the information.

Under Regulation 73 of the Conservation of Habitats and Species Regulations, 2010, where development is likely to have a significant effect on a Special Area of Conservation or Special Protection Area, it is a condition of any planning permission granted under these arrangements that prior notification be given to the NPA before starting work.