

PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY

DELEGATED DECISION REPORT



Ref No: NP/26/0025/FUL

Proposal: Retention of existing bunk barn accommodation with associated amenities for recreation and education as was approved under a temporary permission (NP18/0621/FUL)

Site Location: Morawelon, Moylegrove, Cardigan, Pembrokeshire, SA43 3BX

Recommendation: Refusal

Summary:

This application seeks consent for the retention of the existing bunk barn accommodation at Morawelon Farm, together with its associated amenities, for recreational and educational use as part of a farm diversification scheme. The development was previously granted a temporary planning permission under application ref. NP/18/0621/FUL. Under that consent, a temporary permission was issued for three years, which subsequently expired in 2021.

The application seeks full planning approval to regularise the previous change of use of the agricultural outbuildings for use by the Adventure Beyond business as a farm diversification scheme to supplement the agricultural enterprise based at Morawelon Farm.

The use of the accommodation and associated amenities is proposed to be seasonal; the accommodation facilities, which sleep up to 14 people, will only allow groups to stay on a short-term basis.

The proposed development has resulted in unacceptable landscape impact on the National Park and could potentially disturb species and habitats within the coastal zone. The proposal would not be compatible with the National Park's purpose of conserving and enhancing its natural beauty, wildlife, and cultural heritage, nor would it protect its Special Qualities or its landscape.

Given the above concerns raised in addition to the lack of information, the proposal is deemed unacceptable from a biodiversity perspective and is therefore contrary to Policies 01, 07, 08, 10, 11, 14, 29 and 45 of the LDP2, and to the requirements of Planning Policy Wales (2024) and does not comply with the *Wildlife & Countryside Act 1981 (as amended)*, the *Conservation of Habitats and Species Regulations 2017* and the *Environment (Wales) Act 2016*.

Impacts on residential amenity and on matters of access and drainage are acceptable or can be addressed appropriately through planning conditions; these matters do not outweigh the harm identified above. The proposal is therefore recommended for refusal.

In reaching a recommendation, regard has been given to the requirements of sections 3 and 5 of the *Well Being of Future Generations (Wales) Act 2015*. It is considered that this recommendation is in accordance with the Act's sustainable development principle through its contribution towards the Welsh Ministers' well-being objective of supporting safe, cohesive and resilient communities.

Consultee Response summary:

- **Nevern Community Council: Objecting**

The Community Council referred to the judicial review of the Old Bus Depot application, where consideration was needed regarding the proposal's potential biodiversity impact on Ceibwr Bay, the Aberath Carreg Wylan SSSI, and Cardigan Special Area of Protection (SAC). Accordingly, the Council objects to any grant of permission until this has been assessed in relation to this proposal.

- **PCC Drainage: No adverse comment**

Drainage Officers confirm that SAB approval is not required but make no comments on the proposal.

- **PCC Transport: No objection**

Highways Officers are satisfied that the proposal would not adversely impact the existing parking provision, access arrangements, or local highway network.

- **PCNPA Access Officer: Conditional Consent**

The Authority's Access Officer is satisfied that the increased level of vehicles that would use the bridleway would not negatively impact on users of the bridleway. No objections are raised regarding the proposal, subject to it not obstructing, damaging, or adversely affecting the bridleway.

- **PCNPA Ecology: Conditional Consent**

The Authorities Ecology Officer considers it unlikely that the development site will cause any adverse effects or a reduction in the area of the habitat within the SAC through direct or indirect change to the physical quality of the environment (including the hydrology) of the habitats within the site.

The Officer also considers that the change of use to accommodation in this area does not raise concerns, and they would not object to other similar developments for accommodation solely based on the site's proximity to the SAC.

However, the officer expresses concern about the information submitted in the planning statement regarding the ancillary or business uses of this development, the education/accommodation use of the structures, and their impact on the qualifying features of nearby Protected Sites. The Officer notes there is a lack of information regarding the functionally linked business use of the development, and the interaction between the outdoor activities the business offers and the development on this site, noting information would be needed on the following:

- Types of outdoor activities to be offered from the development site (if any)
- The nature of the courses run from the site
- The destination of these activities in relation to the surrounding landscape and
- SACs (if they are conducted off-site)

The Officer concludes that, at this time, a full HRA is not required for this application because the proposal is recommended for refusal.

- **CADW - Protection & Policy: No response received**

- **PCNPA Park Direction (Strategic Policy): No response received**

Public Response

Site notices and neighbour notification letters were posted in accordance with the requirements of the *Town and Country Planning (Development Management Procedure) (Wales) Order 2012*.

Third-party representations have been received from twenty individuals in relation to the proposal, objecting to the development on a combination of the following grounds:

- Material loss of neighbourhood amenity arising from the noise and disturbance of the campsite on site.
- Increased vehicular traffic along the bridleway will cause traffic issues.
- Experience of the site being used mainly for recreational activity rather than educational.
- Anti-social behaviour from visitors at the site and in the locality.
- The continued use of the farm as a base for Adventure Beyond constitutes corporate expansion rather than farm diversification.
- The current trend of an incremental intensification of tourism activity infrastructure serving organised coastal recreation at Ceibwr Bay.
- The adverse impact the commercial activities have on the local biodiversity of Ciebwr Bay and the surrounding nationally protected sites (Aberath Carreg Wylan SSSI and Cardigan Special Area of Protection).

Whilst the above objections would add further weight to the concerns already raised by Officers. These concerns will not alter the principal reasons for refusal already raised within the main report. Therefore, the above aspects have not been considered in detail within the report below.

Policies considered

Development Plans

All planning applications in Wales need to be determined in accordance with the statutory Development Plan:

Future Wales: The National Plan 2040 [REDACTED] (FW)

Local Development Plan 2 (Adopted September 2020)

Within the Pembrokeshire Coast National Park, the Local Development Plan 2 (LDP2) is also a relevant development plan, with the following policies applicable to this proposal.

- Policy 01 (National Park Purposes and Duty)
- Policy 07 (Countryside)
- Policy 08 (Special Qualities)
- Policy 10 (Sites and Species of European Importance))
- Policy 11 (Nationally Protected Sites and Species)
- Policy 12 (Local Areas of Nature Conservation or Sites of Geological Interest)
- Policy 14 (Conservation of the Pembrokeshire Coast National Park)
- Policy 29 (Sustainable Design)
- Policy 30 (Amenity)
- Policy 32 (Surface Water Drainage)
- Policy 38 (Visitor Economy)
- Policy 40 (Self-Catering Development)
- Policy 45 (Farm Diversification)
- Policy 59 (Sustainable Transport)
- Policy 60 (Impacts of traffic)

These policies can be viewed on the Policies page of the Pembrokeshire Coast National Park website: [REDACTED]

Planning Policy Wales (PPW12)

PPW12 sets out the Welsh Government's land-use planning policies.

The primary objective of PPW12 is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties such as the Socio-economic Duty.

- [REDACTED] (PPW12).

Technical Advice Notes

The Future Wales Plan should be seen and read as a whole, and in conjunction with National planning policy in the form of Planning Policy Wales (Edition 12, February 2024) as well as considering the following Welsh Government Technical Advice Notes (TAN's)

[REDACTED]:

- TAN 04 - Retail and Commercial Development
- TAN 05 - Nature Conservation and Planning
- TAN 06 - Planning for Sustainable Rural Communities
- TAN 12 - Design
- TAN 13 - Tourism
- TAN 15 - Development, flooding and coastal erosion (2025)
- TAN 16 - Sport, Recreation and Open Space
- TAN 18 – Transport
- TAN 23 – Economic Development
- TAN 24 – The Historic Environment

LDP2 Supplementary Planning Guidance

In addition, the Authority produces Supplementary Planning Guidance (SPG) on various topics that may be material considerations in determining any future application. In respect of the proposal, the most relevant SPG's are: [REDACTED]

[REDACTED]

- SPG - Biodiversity
- SPG - Landscape Character
- SPG - Seascape Character
- SPG - Sustainable Design and Development

Constraints

- Right of Way Inland - 50m
- Ancient Monument - within 500m
- ROW Coast Path - within 10m
- Recreation Character Areas
- Pen y Afr to Pen y Bal Seascape Character Area (SCA3)
- Camaes Head Landscape Character Area (LCA25)

Officer's Appraisal

This application seeks consent the retention of the existing bunk barn accommodation at Morawelon Farm, together with its associated amenities, for recreational and educational use as part of a farm diversification scheme. The development was previously granted a temporary planning permission under application ref. NP/18/0621/FUL. Under that consent, a temporary permission was issued for three years, which subsequently expired in 2021.

The application site, Morawelon, comprises an established agricultural holding of approximately 100 acres, located in a rural setting approximately one kilometre north of the settlement of Moylegrove, at the northern extent of the National Park. Access to the site is obtained via Public Bridleway PP87/44, which extends northwards for approximately one kilometre from the adjoining county highway (ZC3029) towards [REDACTED]. The bridleway passes through the application site and continues beyond, serving the Cwm Connell Holiday Cottage complex (6 Holiday Lets) to the north.

The bridleway passes through the centre of the site, dividing the farmhouse to the east from the main agricultural yard and outbuildings to the west. The buildings to which this application relates are located either side of the bridleway in the southern part of the farm complex. The bunk barn accommodation is situated to the east of the bridleway and is comprised of concrete block with a ridgeline running east to west. The outbuildings, which contain the associated facilities, lie to the west of the bridleway, within a barn clad in corrugated metal sheeting and an adjoining concrete lean-to structure.

The submitted planning statement states that the farm's main business is farming, with the proposed farm diversification scheme operating on a seasonal basis.

The application is located within the Pen y Afr to Pen y Bal Seascape and Camaes Head Landscape Character Area. The site is situated approximately 950 meters east of Ceibwr Bay, which is a designated Special Area of Conservation (SAC) and Special Site of Scientific Interest (SSSI).

1. Site and Proposed development

The application seeks full planning approval to regularise the previous change of use of the agricultural outbuildings for use by the Adventure Beyond business as a farm diversification scheme to supplement the agricultural enterprise based at Morawelon Farm.

The use of the accommodation and associated amenities is proposed to be seasonal; the accommodation facilities, which sleep up to 14 people, will only allow groups to stay on a short-term basis.

2. Relevant Planning History

NP/18/0621/FUL - Retrospective change of use of agricultural outbuildings to bunk accommodation, associated toilet & shower block & mixed use agricultural, recreational & educational building as a farm diversification scheme. Temporary 3-year consent approved with conditions, 25th June 2019

3. Key Issues

The application raises the following planning matters:

- 3.1 Policy, Principle of Development and Impact upon the Special Qualities of the National Park
- 3.2 Siting and Design
- 3.3 Amenity and Privacy

- 3.4 Biodiversity, Protected Sites, Green Infrastructure & Landscaping
- 3.5 Access and Parking
- 3.6 Surface Water Drainage

3.1 Policy, Principle of Development and Impact upon the Special Qualities of the National Park:

Section 38 of *The Planning and Compulsory Purchase Act 2004* requires that in determining a planning application the determination must be in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the National Park comprises Future Wales - The National Plan 2040 (FW) and the Local Development Plan 2 (LDP2).

Future Wales – The National Plan 2040 (FW) was adopted on 24th February 2021 and is the National Development Framework for Wales, and the national tier of the Development Plan. Policy 4 (Supporting Rural Communities) states that Strategic and Local Development Plans must identify their rural communities, assess their needs, and set out policies to support them. On page 104, Future Wales states that: '*National Park Authorities are unique planning entities with a specific remit to reflect the distinctive characteristics of their areas...and that Future Wales policies respect the functions of National Parks in terms of their statutory purposes...*'.

The primary objective of PPW12 is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental, and cultural well-being of Wales, as required by the *Planning (Wales) Act 2015*, the *Well-being of Future Generations (Wales) Act 2015* and other key legislation and resultant duties such as the Socio-economic Duty.

A well-functioning planning system is fundamental for sustainable development and achieving sustainable places. PPW12 promotes action at all levels of the planning process which is conducive to maximising its contribution to the well-being of Wales and its communities.

The submitted planning statement indicates that temporary consent was granted for 5 years under NP/18/0621/FUL; this is incorrect, as the application was granted a 3 year temporary consent.

LDP2 Policy 01 (National Park Purpose and Duty) seeks to conserve and enhance the natural beauty, wildlife, and cultural heritage of the park, as well as the public understanding and enjoyment of its special qualities. The current proposal is considered by objectors to result in impacts on the local SAC which have not been fully considered at this time, and therefore Officers are not able to confirm that the permanent use of the site as a mixed-use site with bunkhouse accommodation with the associated activities for recreation and education (including outdoor activities such as kayaking, coastering, mountain biking, etc., training courses and coaching) will not result in a significant adverse impact on the nearby SAC from these activities, as the assessment has not been undertaken. The application is not considered to comply with Policy and therefore the HRA assessment is not triggered.

Whilst it is clear that the outdoor activities business operates within the coastal zone and accesses these areas from Ceibwr Bay, it is not clear whether the current application site provides a base for these activities. Without this information being confirmed, there is a need to screen the development and its activities, which would arise from the development, and their impact on the qualifying features of nearby Protected Sites.

The potential for the development to have a significant detrimental impact on the nearby SAC and SSSI from its associated activities has not been fully considered at this time, and the application fails to provide the necessary information for a full consideration on this aspect.

Policy 07 (Countryside) of LDP2 seeks to control development in the countryside strictly. This policy identifies farm diversification as an acceptable form of development in principle. It also identifies that a rural enterprise, tourist attraction, or recreational activity is proposed, where locating in a countryside setting is essential. The current application is proposed as a farm diversification, and therefore Policy 45 is relevant. The application also identifies that the site will be linked to an existing business which operates recreational activities within the coastal zone. However, Officers do not consider these types of activities essential enough to require a countryside location base. The base for these activities could be based within defined urban areas.

Policy 08 (Special Qualities) of LDP2 seeks to conserve and enhance the National Park's special qualities. A list of these special qualities has been agreed, outlining priorities for where they can be conserved and enhanced by development. Where there is a proposal which is not considered to preserve or, wherever possible, enhance, the officer will not be in a position to support the application. The Pembrokeshire Coast National Park is a living, working landscape of outstanding natural beauty and national importance. This unique area enables people to enjoy and explore many different coastal and inland landscapes, within a relatively small area.

Landscapes and Seascapes are of exceptional diversity and quality, with rich and varied wildlife. The National Park is renowned for its biodiversity, including rare and endangered species. The coast, inshore waters, and islands are home to internationally important seabird colonies and support a wide range of marine species. The combination of special qualities can help maintain the integrity and distinctiveness of the National Park for current and future generations. The current application does not provide sufficient information to confirm that the proposed development and its associated activities will positively enhance the National Park's ecosystems and the components that underpin them.

Policy 10 (Sites and Species of European Importance) of LDP2 seeks to support development which is unlikely to have a significant effect on a European Site, when considered alone or in combination with other projects. Support will be given where:

- a) The proposal is directly connected with or necessary for the protection, enhancement and positive management of the site for conservation purposes; or
- b) Following an appropriate assessment the proposal will not adversely affect the integrity of the site; or

- c) There is no alternative solution, and there are reasons of overriding public interest and appropriate compensatory measures are secured.

Where developments are likely to affect a European protected species adversely, they will be permitted only if they meet certain criteria. This can only be permitted where:

- a) There are reasons of overriding public interest;
- b) There is no satisfactory alternative; and
- c) The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their nature range.

The lack of information, as detailed above under Policy 1, raises the possibility that the proposed development may adversely impact on a European protected species. Given the lack of information submitted as detailed above, no appropriate assessment has been carried out to date. As such, the site's integrity cannot be considered under Policy 10 at this time.

Policy 11 (Nationally Protected Sites and Species) of LDP2 controls development that is likely to have an adverse effect either directly or indirectly on the conservation value of nationally protected sites and will only be permitted where it is demonstrated that:

- a) There is no suitable alternative to the proposed development; and
- b) It can be demonstrated that the benefits from the development clearly outweigh the special interest of the site; and appropriate compensatory measures are secured; or
- c) The proposal contributes to the protection, enhancement or positive management of the site.

Where the development is likely to harm nationally protected species, this will only be permitted where it is demonstrated that:

- a) The population range and distribution of the species will not be adversely impacted;
- b) There is no suitable alternative to the proposed development;
- c) The benefits of the development clearly outweigh the adverse impacts on the protected species; and
- d) Appropriate avoidance, mitigation and compensation measures are provided.

Again, the lack of information, as detailed above under Policy 1, raises the possibility that the proposed development may adversely impact on a European protected species. Given the lack of information submitted as detailed above, no appropriate assessment has been carried out to date. As such, the site's integrity cannot be considered under Policy 11 at this time.

Policy 14 (Conservation of the Pembrokeshire Coast National Park) of LDP2 indicates that development will not be permitted where this would have an unacceptable adverse effect on the qualities and special landscape and seascape character of the Pembrokeshire Coast National Park including locally distinctive characteristics by:

- a) Causing visual intrusion; and/or,
- b) Introducing or intensifying a use which is incompatible with its location; and/or
- c) Failing to harmonise with, or enhance the landform, landscape and seascape character of the National Park; and/or

d) Losing or failing to incorporate important traditional features.

In assessing the impact upon the National Park, matters of detail and cumulative impact will be given special consideration.

The proposal is considered likely to intensify a use that is not compatible with the location, in that the levels of associated outdoor activities operated as part of the business from the site cannot be accurately measured based on the level of information submitted with the current application. This also results in a lack of consideration of the impact on the local area's seascape character within the National Park, and of whether the proposal will, in fact, harmonise with or enhance this character. Given that the levels of use for the outdoor activities within the coastal zone have not been submitted, Officers raise concerns about the lack of information in this respect, and the application fails to clearly consider the impact on the qualities and special seascape character in this instance. As such, the proposal does not accord with Policy 14.

Policy 45 (Farm Diversification) of the LDP2 supports farm diversification where:

- a) The scheme takes place on a working agricultural unit; and
- b) The proposal assists in sustaining the agricultural unit; and
- c) The proposal is compatible with its location; and
- d) The proposal is in harmony with and/or enhances the National Park landscape; and
- e) If a new building is justified, it should be sited in or adjacent to an existing group of buildings; and
- f) The vitality and viability of retailing and services in nearby Centres are not adversely affected; and
- g) Subject to there being no unacceptable adverse effects

The previous temporary consent was granted to enable the proposed change of use and business activities to be fully assessed over time, demonstrating that the proposed rural business diversification is acceptable. The application for permanent consent should clearly demonstrate how the proposed development will help sustain the existing farm business in both the short and long term. The applicant should also show how the income from the proposed development would be invested in the farm to ensure a more viable farming activity can be sustained, as the functioning of the main agricultural unit should not be prejudiced by the proposal. The Authority would then be in a position to fully understand the overall approach to the farm, in particular, how the proposed new economic activities are clearly linked to a working agricultural unit and how they assist in maintaining that enterprise.

The submitted planning statement indicates that the farm is still run as it was when the original application was submitted in 2019, with similar stocking levels and the land under a rolling lease. The stocking levels support one full-time worker to ensure welfare and the running of the farm business as set out in Table 1 within the planning statement.

The statement also confirms that the farm diversification aspect supports the existing farm enterprise through supplemental income but does not provide detailed information on how the money raised by the farm diversification business is directly reinvested in the existing agricultural unit, other than its continued use as a farming

unit. The statement also confirms that the applicant would accept a condition tying the business to the land and farm, which could ensure that, should the business fail or move from this site, the existing buildings would be returned to their original condition.

In addition to the planning statement, the applicant has provided accounting information for 2021 to 2024, including accounts for the applicant, with limited information on the farming and accommodation business. The accounts do not show details for the associated outdoor activities business, which is also linked to the site through equipment storage and use of the site as a satellite base for the activities.

As such, Officers consider that there is insufficient information to assess the full scale of the proposed farm diversification in this instance and whether the diversification is of a scale which prejudices the main agricultural unit, and this would constitute a reason for refusal.

It is therefore considered that the proposal is not in accordance with several policies within LDP2; namely:

- Policy 01 (National Park Purposes and Duty)
- Policy 07 (Countryside)
- Policy 08 (Special Qualities)
- Policy 10 (Sites and Species of European Importance)
- Policy 11 (Nationally Protected Sites and Species)
- Policy 14 (Conservation of the Pembrokeshire Coast National Park)
- Policy 45 (Farm Diversification)

As such, this proposal is not considered acceptable in principle and cannot be supported by officers, as it fails to accord with the adopted LDP2 policies.

3.2 Siting and Design:

Policy 07 (Countryside) of LDP2 seeks to control development in the countryside strictly. This policy identifies what forms of development will be acceptable in principle. It further states that support will be given for the conversion of appropriate buildings. An appropriate building is considered to be set out within National planning guidance under TAN 23: Economic Development (para 3.2.1), which refers to buildings needing 'to be of a form, bulk, and general design which are in keeping with their surroundings'

In this National Park, these are considered to be those that make a positive contribution to the character of the area through their intrinsic architectural merit or their setting in the landscape. Their interest and charm stem from an appreciation of the building's functional requirements, its layout and proportions, the types of building materials used (including those constructed of stone, clom, and slate), and its display of local building methods and skills. The form, bulk, design and building materials used in some buildings can make them visually intrusive in the landscape. Often, buildings constructed of concrete blocks, asbestos sheeting, corrugated iron, etc., clear-span buildings, Dutch barns, and open-sided hay sheds fall within this category. The conversions of buildings that are obtrusively located in the landscape or otherwise not in keeping with their surroundings will not be encouraged.

Policy 29 (Sustainable Design) of LDP2 requires that all development demonstrate an integrated approach to design and construction, and will be required to be well designed in terms of:

- a) Place and local distinctiveness
- b) Environment and biodiversity
- c) Community cohesion and health
- d) Accessibility
- e) Efficient use of energy
- f) Energy generation
- g) Materials and resources
- h) Water and drainage
- i) Waste
- j) Resilience to climate change

Nevern Community Council have stated that the original planning permission was temporary, from 2019 to 2022, for three years with conditions attached. The agricultural building used as the bunkhouse, although it has been adapted, is unsuitable; it is not an attractive stone building but merely an old, corrugated block-worked agricultural shed.

Officers do not disagree with the views of Nevern Community Council in that it is considered that the existing building for the bunkhouse accommodation would not be considered appropriate for conversion in this instance as it fails to meet the above planning guidance on appropriate buildings for conversions within the countryside. Therefore, the application does not accord with Policy 07 of LDP2.

The existing structures on site, given their form, scale, building materials and methods of construction, also fail to accord with Policy 29 of LDP2 in that they do not form a positive contribution to the place and local distinctiveness of the area and that the existing buildings also fail to demonstrate efficient use of energy.

As a result, the proposed development is considered to detract from the special qualities of the National Park in this location. It would be detrimental to the quality and character of the landscape character area in which the site sits, and as such does not comply with Policies 07 and 29 of LDP2, and cannot be supported by Officers.

3.3 Amenity and Privacy:

Policy 30 (Amenity) of LDP2 seeks to protect the amenity of people living in the National Park and states that development will not be permitted where it has an unacceptable adverse effect on amenity, particularly where:

- a) the development would have a detrimental impact on the quality of the environment currently enjoyed by people living, working or visiting the Park; and/or
- b) the development is of a scale incompatible with its surroundings; and/or
- c) the development leads to an increase in traffic or noise or odour or light which has a significant adverse effect; and/or
- d) the development is visually intrusive.

Policy 30 (Amenity) supports Policy 14 (Conservation of the Pembrokeshire Coast National Park) in not allowing development that creates a visual intrusion.

The proposal is located within a working farm, and an associated dwelling is also near the bunkhouse. The proposed bunkhouse development could accommodate up to 14 people. The planning statement also details how the site is currently used as a satellite base for the outdoor adventure company. Therefore, in theory, the site could well exceed the 14 people mentioned above at certain times of the day if outdoor adventure activities are also on site.

The previous application also considered this aspect and noted that neighbours had already complained about previous noise disturbances, including excessive noise from large groups (inc. stag and hen parties). Following Officers' consideration of the noise impact, the agent submitted a noise attenuation strategy, and a planning condition was imposed on the 3-year temporary consent.

Officers have again checked with the Pembrokeshire County Council Public Protection Team to ascertain whether there have been any new noise complaints since the previous planning application. The Public Protection Team have confirmed that no new noise complaints have been received since the last application. Therefore, Officers would consider it reasonable to seek again to impose a planning condition requiring agreement of a noise mitigation strategy for the development site, if it were being recommended for approval, which would accord with Policy 30 of LDP2.

However, it is noted that whilst the impact on amenity and privacy is deemed acceptable subject to conditions, this would not outweigh the principal reasons for refusal to the current application.

3.4 Biodiversity, Protected Sites, Green Infrastructure & Landscaping

Biodiversity impacts

PPW12, TAN5, and Policy 11 (Nationally Protected Sites and Species) of LDP2 require that biodiversity considerations be taken into account when determining individual applications. The presence of a species protected under UK or European legislation is a material consideration when dealing with applications likely to cause disturbance or harm to the species or its habitat.

Nevern Community Council objects to this planning application and notes that the site was granted temporary 3-year approval for a new business. They indicate that, as established in the Judicial Review of the Old Bus Depot planning application, the current application should be considered in light of potential biodiversity impacts on Ceibwr Bay and its SSSI and SAC. They also indicate that no permission should be granted until this potential biodiversity impact has been assessed. Therefore, they object to the approval of this planning application without the assessment being carried out.

Protected Sites and Species

The application site is within 1km of the Cardigan Bay / Bae Ceredigion Special Area of Protection (SAC) and the Aberath Carreg Wylan Site of Special Scientific Interest (SSSI), and approximately 300m away from the nearest hydrologically connected watercourse. As a competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), officers have to consider the impacts of development on the features for which the European site is designated and where

necessary undertake a Test of Likely Significant Effect (TLSE). The nature of the development, the proximity to the SAC, and the surrounding topography mean there are no direct pathways for pollution.

It is considered not likely that the development site itself will cause any adverse effects including sediment transfer and deposition, turbidity, noise, visual presence, physical disturbance, and nutrient transfer. There will be no reduction in the area of the habitat within the SAC, and there will be no direct or indirect change to the physical quality of the environment (including the hydrology) of the habitats within the site. There is unlikely to be any ongoing disturbance to species or habitats for which the site is notified or changes in species composition or population size of any feature, and there is no direct pathway to adverse effects from the development of the structures.

A specific change of use to the accommodation in this area does not raise concerns, and the ecology team would not object to other similar developments for accommodation purely due to the proximity to the SAC. For example, holiday let accommodation, where the occupants would walk the Pembrokeshire Coast Path or swim/paddleboard in the nearby Ceibwr Bay recreationally, both are within the SAC and SSSI.

However, due to the information submitted in the planning statement, the ecology team are concerned about the ancillary or business uses of this development, as well as the education/accommodation uses of the structures, and their impact on the qualifying features of nearby Protected Sites. If these activities exceed normal recreational pressures, the ecology team would need to assess their impact on the Protected Sites' Qualifying Features.

From the planning statement, the ecology team have considered the following operations and activities to be run by the business (though not necessarily out of this site, seeing as permission lapsed in 2024): outdoor activities including:

- Kayaking
- Coasteering
- Mountain biking; etc.
- Training courses and coaching

The existing business is undertaking these operations, and the ecology team is not at liberty to conduct an HRA on whether they can operate. However, the specific operations tied to this development were found to be as follows:

- Undercover space for educational/training purposes during inclement weather
- Satellite location for overnight accommodation of these small groups
- Groups typically stay for 1-2 nights to tie-in with courses run from the site
- Walking trips.

Officers consider that there is a lack of information submitted regarding the functionally linked business use of the development, and the interaction between the outdoor activities the business offers and the development on this site. While there is a significant distance to the SAC physically, and no control is given to the business operations not tied to the development. Therefore, Officers consider further screening is required for the use and activities which would arise from the development. Any new application would need to detail the following information:

- Types of outdoor activities to be offered from the development site (if any)
- The nature of the courses run from the site
- The destination of these activities in relation to the surrounding landscape and

SACs (if they are conducted off-site)

Additionally, if the above information, when sourced, suggests there may be an impact on the nearby SSSI, NRW should be reconsulted on this application. The LPA is required by section 28 of the Wildlife and Countryside Act 1981 to notify NRW before reaching any decision that may affect an SSSI. This requirement applies whether or not the operation would take place on land included in the SSSI. The Authority must then allow 28 days before deciding whether to issue consent, unless NRW has notified the Authority that it does not need to wait until then. The authority must take into account any advice from NRW when deciding whether to permit the proposed operations and, if so, what, if any, conditions should be attached to the permission. It is the duty of the Authority to further the conservation and enhancement of any SSSIs for which it is responsible, including when making planning decisions that may impact an SSSI.

At this moment, a HRA is not required for this application because the proposal is being recommended for refusal. The Conservation of Habitats and Species Regulations 2017 require assessment only where a competent Authority intends to grant consent or adopt a plan that may have a likely significant effect on a Protected Site. Given that the application is to be refused, there is no pathway for potential impacts to occur; therefore, an HRA is unnecessary. The information has been included above for reference should the application progress to an appeal or if any further information is received.

Given the above concerns raised with a lack of information, the proposal is deemed unacceptable from a biodiversity perspective. It is therefore contrary to Policies 1, 8, 10, 11, and 14 of the LDP2, and to the requirements of Planning Policy Wales (2024) and does not comply with the *Wildlife & Countryside Act 1981 (as amended)*, the *Conservation of Habitats and Species Regulations 2017* and the *Environment (Wales) Act 2016*.

3.5 Access and Parking

Policy 59 (Sustainable Transport) of LDP2 is a strategic policy that ensures opportunities are taken to promote sustainable travel choices and reduce the need to travel by car by permitting proposals that improve traffic and parking management. Additionally, Policy 60 (Impacts of traffic) of LDP2 permits development where appropriate access can be achieved.

A registered public right-of-way, Public Bridleway PP87/44, provides access and crosses the red-lined development area, as shown by the blue line on the plan below. The public have a right of passage on foot, pedal bicycle and on horseback along the public right of way.

The bridleway has an unbound but firm surface of crushed stone. It is accommodated by a hedgebanked lane with a general width of approximately 2.5 to 3 metres. The lane is currently used as a primary means of access to Morawelon and properties further north. It is also used by agricultural traffic to access fields, etc.

The proposed development would increase the number of motor vehicles using the bridleway; however, this would not be to an extent that would negatively impact

bridleway users. As such, no adverse comments are raised in respect of the impact on the Public Bridleway PP87/44 from the proposed development. An informative note will be added to any consent granted to ensure that the route is retained and unimpeded.

The application site forms part of an established farm holding located in a rural coastal setting to the north of Moylegrove. The farm is accessed via a narrow track from the adjoining Class III highway approximately 225m to the south of the site, which also serves neighbouring properties to the north and north-west, and is still used primarily for agricultural purposes and self-catering cottages.

The access track joins the Class III highway at an oblique angle, with some restriction to visibility. However, vehicle speeds approaching from the Moylegrove direction are naturally reduced by the road's gradient and horizontal alignment. The visibility constraint is limited and short in length, and there is adequate space within the junction for vehicles to pass. The junction geometry is favourable for movements towards Cardigan and the A487, which represent the predominant direction of travel. Movements to and from the south can also be undertaken safely due to the wide junction area and open forward visibility. The access has supported the site for the previous 7 years with no issues. The access track surface is stable, with no evidence of loose material being deposited onto the County highway.

The planning statement indicates that visitors travel to the site by bus, which limits individual vehicle movements. Specialised groups use the accommodation, and it is seasonal, with no/minimal traffic volume generation. Most groups/visitors arrive by mini-bus; there is sufficient parking, and turning is available within the confines of the site, without causing undue obstruction to the access lane/bridleway.

As such, the County Highway Authority confirms that the proposal would not adversely impact existing parking provision, access arrangements, or the local highway network and accords with Policies 59 and 60 of LDP2.

However, it is noted that whilst the access and parking is deemed acceptable, this would not outweigh the reasons for refusal.

3.6 Surface Water Drainage:

Policy 32 (Surface Water Drainage) of LDP2 requires that development incorporate sustainable drainage systems to dispose of surface water on site. This is to minimise adverse environmental impacts during construction and upon completion.

Pembrokeshire County Council Drainage Engineers have indicated that the original consent was granted temporary consent before the introduction of SAB requirements, and that, given the proposal is for the retention of the use and no new works are proposed. Therefore, the proposal will not alter the site's surface water regime, and no adverse comments have been raised regarding the application. The application is therefore considered to accord with Policy 32 of LDP2 and TAN 15.

However, it is noted that whilst the surface water drainage is deemed acceptable, this would not outweigh the reasons for refusal.

4. **Conclusion**

The proposed development has resulted in unacceptable landscape impact on the National Park and could potentially disturb species and habitats within the coastal zone. The proposal would not be compatible with the National Park's purpose of conserving and enhancing its natural beauty, wildlife, and cultural heritage, nor would it protect its Special Qualities or its landscape.

Given the above concerns raised in addition to the lack of information, the proposal is deemed unacceptable from a biodiversity perspective and is therefore contrary to Policies 01, 07, 08, 10, 11, 14, 29 and 45 of the LDP2, and to the requirements of Planning Policy Wales (2024) and does not comply with the *Wildlife & Countryside Act 1981 (as amended)*, the *Conservation of Habitats and Species Regulations 2017* and the *Environment (Wales) Act 2016*. The proposal is therefore recommended for refusal.

In reaching a recommendation, regard has been given to the requirements of sections 3 and 5 of the *Well Being of Future Generations (Wales) Act 2015*. It is considered that this recommendation is in accordance with the Act's sustainable development principle through its contribution towards the Welsh Ministers' well-being objective of supporting safe, cohesive and resilient communities.

5. **Recommendation**

Refuse, for the following reasons:

1. The proposed development has resulted in unacceptable landscape impact on the National Park and potentially disturbed species and habitats within the countryside. The proposal would not be compatible with the National Park's purpose of conserving and enhancing its natural beauty, wildlife, and cultural heritage, nor would it protect its Special Qualities or its landscape. As such, the proposal is considered contrary to Policy 1 (National Park Purposes and Duty), Policy 07 (Countryside), Policy 8 (Special Qualities), Policy 14 (Conservation and Enhancement of the Pembrokeshire Coast National Park), Policy 29 (Sustainable Design) of LDP2.
2. Officers consider that there is a lack of information regarding the functionally linked business use of the development, and the interaction between the outdoor activities the business offers, and the proposed development on this site. Further screening is required for the use and activities which would arise from the development. In the absence of information confirming the types of outdoor activities to be offered from the development site, the nature of the courses run from the site, and the destinations of these activities in relation to the surrounding landscape and seascape, including the SAC. The application fails to demonstrate that impacts on the Cardigan Bay / Bae Ceredigion Special Area of Protection (SAC) and the Aberath Carreg Wylan Site of Special Scientific Interest (SSSI). As such, the proposal is considered contrary to Policy 1 (National Park Purposes and Duty), Policy 8 (Special Qualities), Policy 10 (Sites and Species of European Importance), Policy 11 (Nationally Protected Sites and Species), Policy 14 (Conservation and Enhancement of the Pembrokeshire Coast National Park) of LDP2, Section 6 of Planning Policy Wales (Edition 12), *Wildlife & Countryside Act 1981 (as amended)*, the *Conservation of Habitats and Species Regulations 2017* and the *Environment (Wales) Act 2016*.

3. The application for permanent consent should clearly demonstrate how the proposed development will help sustain the existing farm business in both the short and long term. The applicant should also show how the income from the proposed development would be invested in the farm to ensure a more viable farming activity can be sustained, as the functioning of the main agricultural unit should not be prejudiced by the proposal. There is insufficient information to assess the full scale of the proposed farm diversification in this instance, or whether the diversification is at a scale that prejudices the main agricultural unit, which would constitute a reason for refusal. The proposal is therefore considered contrary to Policy 45 of LDP2.