

Application Ref: NP/21/0110/FUL

Case Officer	Kate Attrill		
Applicant	Mr Andrew Hebard		
Agent	Mr Tomas Kinver, Kinver Kreations Ltd		
Proposal	Replacement Dwelling		
Site Location	Pen-castell, Moylegrove, Pembrokeshire, SA43 3BU		
Grid Ref			
Date Valid	25-Feb-2021	Target Date	09-Jun-2021

This application is being brought to Development Management Committee due to the Local Member having called it in under the call-in process.

Consultee Response

Dyfed Archaeological Trust: Conditional Consent

Dwr Cymru Welsh Water: Observations

CADW - Protection & Policy: No objection

PCC - Drainage Engineers: Conditional Consent

PCC - Transportation & Environment: No Objection

PCNPA Planning Ecologist: Further information required

PCNPA Buildings Conservation Officer: Observations

PCNPA Park Direction: Observations

PCNPA Access Manager: Conditional Consent

Nevern Community Council: Recommend Refusal (relating to the first version of proposals)

Members of Nevern Community Council strenuously oppose the development of PenCastell, Ceibwr, Moylegrove.

The proposed builds' appearance at Pen Castell is totally out of character with the existing building. It is an unsympathetic, obtrusive, an over development on an important geological coastal cliff top on one of Pembrokeshire's main beauty spots. A carbuncle in the making, an eyesore.

There are no other buildings similar to this new build in this significant and presently unspoilt landscape. The views from this site are iconic, across unspoilt open vistas, out over the Irish sea, the coastline, the cliffs not to mention the landscape across the small inlet of Ceibwr Bay and the rolling hills of the area.

The site is visually sensitive from each compass point which is probably why a small low coastguard lookout cottage was built here. The actual proposed two-story building that is twice the height of the original, with zinc standing seam matt copper or brown roofing materials, is totally impractical as history has shown. The pounding wind and rain in storms have in the past thrown stones and small boulders up the cliff hitting the cottage, hence shutters have had to be closed before storms have arrived on the sea side of the building. This is living knowledge as neighbours have had to go to the aid of the last owner of Pen Castell. The zinc is not in keeping with any other dwelling in the area, there is no zinc or tin on the original build, this is also totally impractical because of the sea, the winds and the sea salt.

The narrow 'arrow loop' style windows are totally out of character and should only be the traditional small windows, this is merely for the benefit of privacy for the occupants and not for the walkers.

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At present there are nesting boxes on the property, are they going to remain there? There is no mention of them in the plans.

The cliff face that the property sits on is of significant geological interest, where many eminent geologists visit. This would obviously be disturbed.

The planning application has six bedrooms (including the annex bed) and an annex with car births for four cars. The annex already has a bathroom, sitting area, dining area and a bed. This is obviously another living area with the car port underneath ready for conversion. The whole ethos of the build does not lend itself to be a family home but more a hotel type. Therefore, there would be a significant increase in traffic, which would have to travel through narrow lanes of Moylegrove/Monington and through a working farmyard, down a bridlepath to reach this property.

If this dwelling was to be given planning permission there should be no further development allowed along the bridlepath that would be detrimental to the legs and hooves of horses to accommodate the extra traffic, such as builders' vehicles, builders' lorries or deliveries. This part of the world's bridle paths has already suffered at the hands of holiday cottages!

To allow development of the type in open countryside to the detriment of a protected landscape is contrary to the primary purpose of the National Parks designation. That is to preserve and enhance the landscape.

The Low Impact Policy is there to assist Park Authorities in meeting its statutory purpose; conservation of the natural beauty of the landscape and preservation of its qualities.

The Visual Impact Assessment with this application fails to pay significant regard to this intrusion, screening by trees is unlikely to be successful due to the exposed position.

Approval of this application would therefore set a damaging precedence for the Pembrokeshire Coast National Parks Authority and encourage inappropriate proliferation on 186 miles of coastline.

The 200-year-old Pen Castell should be preserved as it's a very old original coastguard's outlook building, which totally suits the landscape, low and unobtrusive, and is already part of Ceibwr history and should remain so. Modernisation should take place only internally.

Nevern CC urge the PCNP planning officers to reject this application to develop PenCastell, Ceibwr, Moylegrove.

10/05/2021 - Further objection letter received from Nevern & Moylegrove

NEVERN and MOYLEGROVE Community Councillors are vehemently opposed to the planning application for Pencastell, Moylegrove

The objections that the council have already stipulated with regard to the previous planning application still stand.

'All the landscapes of Wales are valued for their intrinsic contribution to a sense of place, and local authorities should protect and enhance their special characteristics, whilst paying due regard to the social, economic, environmental and cultural benefits they provide, and to their role in creating valued places. Considering landscape at the outset of formulating strategies and policies in development plans and when proposing development is key to sustaining and enhancing their special qualities, and delivering the maximum well-being benefits for present and future generations

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as well as helping to deliver an effective and integrated approach to natural resource management over the long term.'

The special and unique characteristics of Pencastell, even though it is not historically listed, and with its 'ad-hoc' layout, must be protected in its own right for historic and aesthetic reasons. The layout, scale, form and visual appearance of the proposed development and its relationship to its surroundings are detrimental. It is **NOT** aesthetically pleasing, it is hideous, grotesque and unsightly, and to be placed on the cliff of dynamic and impressive beauty is tantamount to pillage and plunder.

The original coastguard cottage of 200 years gives Ceibwr and surroundings a unique identity and distinctiveness, and how past generations have helped shape the area of Moylegrove. The visual intrusion and the inter-visibility between land and sea of a two-storey build would be detrimental to the Pembrokeshire Coastline, and if granted would set an unfortunate precedent for further coastline deterioration.

To raise a building to the ground and rebuild from scratch would constitute a building plot. Would or should a new development be granted in such a sensitive location?!

Nevern Community Councillors on behalf of Nevern and Moylegrove community say NO. Would PCNPA allow a new development in one of the most iconic geological locations in West Wales, on the top of some of the most ancient and amazing folds in the rock strata in the cliffs, next to an archaeological 'Castell'? Nevern Community Councillors believe not.

So once again Nevern and Moylegrove Community Councillors reiterated that the 200-year-old Pen Castell should be preserved as it's a very old original coastguard's outlook building, which totally suits the landscape, low and unobtrusive, and is already part of Ceibwr history and should remain so. Modernisation should take place only internally.

Public Response

The Town and Country Planning (Development Management Procedure)(Wales) Order 2012 requires that proposed developments are advertised by way of either neighbour letters or a site notice. In this case, both site notice and neighbour letters were sent.

A number of letters of support and objection have been received. 2 letters of support from neighbouring properties have been received, whilst 16 letters of objection have been received in addition to the objection from Nevern Community Council.

Policies considered

Please note that these policies can be viewed on the Policies page Pembrokeshire Coast National Park website -

<http://www.pembrokeshirecoast.org.uk/default.asp?PID=549>

LDP2 Policy 01 - National Park Purposes and Duty

LDP2 Policy 07 - Countryside

LDP2 Policy 08 - Special Qualities

LDP2 Policy 09 - Light Pollution

LDP2 Policy 10 - Sites and Species of European Importance

LDP2 Policy 13 - Welsh Language

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LDP2 Policy 14 - Conservation of the Pembrokeshire Coast National Park

LDP2 Policy 29 - Sustainable Design

LDP2 Policy 30 - Amenity

LDP2 Policy 46 - Housing

LDP2 Policy 59 - Sustainable Transport

LDP2 Policy 60 - Impacts of Traffic

PPW11

SPG05 - Sustainable Design

SPG06 - Landscape

SPG22 - Seascape Character

TAN 05 - Nature Conservation and Planning

TAN 06 - Planning for Sustainable Rural Communities

TAN 12 - Design

TAN 23 - Economic Development

TAN 24 - The Historic Environment

Constraints

Special Area of Conservation - within 500m

Site of Special Scientific Interest - within 50m

Heritage Coast - within 100m

Rights of Way Inland - within 50m

Ancient Monument - within 500m

ROW Coast Path - within 10m

Recreation Character Areas

Affordable Housing Submarkets

Seascape Character Areas

Within Site of Special Scientific Interest consult NRW / Planning Ecologist_20m

Landscape Character Area

Special Area of Conservation - within 50m

Officer's Appraisal

Site and Context

The site of Pencastell lies above Ceibwr Beach on the cliffs to the north west of Moylegrove.

The coastal path runs alongside the property and the site is in an exceedingly prominent location of the National Park.

Historically, the property is believed to have been a coastguard property but has been over-extended and modernised in more recent years. The current property has three bedrooms, a large wrap around conservatory and a double attached garage.

Relevant Planning History

None.

Description of Proposal

The application has been significantly revised since its first submission by:

1. Reduction of Ridge Heights (Reduced Pitch angle of all roof slopes from 45deg to 35deg)
2. Proposed Aluminium Clad Roof Ridge Height Reduced by 1300mm
3. Proposed Slate Roof Ridge Height Reduced by 990mm
4. Garage Roof (now slate) Roof Ridge Height Reduced by 2050mm
5. Garage First Floor Omitted & Garage external steps
6. Garage Footprint Reduced by 12sqm [650mm shorter and 950mm narrower]
7. Garage has been moved 1500mm closer to the proposed house
8. Omission of rooflight facing sea on main house
9. Omission of all rooflights from garage
10. Omission of cladding from garage elevations
11. Cladding Colour changed to Dark Grey (from Copper).

The application now proposes a replacement dwelling with three bedrooms at ground floor level and a further two bedrooms at first floor level. A new double detached garage is also proposed.

The roof of the proposed replacement dwelling has been arranged in three different forms, the highest two storey section with zinc cladding, a lower slate roof, and then a flat grassed roof over the western and southern end with a buttressed chimney on the far south alongside the glazed ground floor.

Key Issues

The application raises the following planning matters:

- Policy and Principle of Development
- Siting, Design and Impact upon the Special Qualities of the National Park
- Access and Parking
- Biodiversity
- Land Stability
- Land Drainage
- Other Material Considerations

Policy:

The site lies within the open countryside as defined by the Pembrokeshire Coast National Park adopted Local Development Plan (LDP) and Policy 7 is the relevant strategic policy which allows for release of land depending: *'on the character of the surroundings, and the pattern of development in the area'*.

There are two statutory duties and purposes of the National Park:

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1. conservation of the natural environment and
2. access for the public.

The Sandford Principle, (named after Lord Sandford who chaired a National Park Policy Review Committee) has established that when there is a conflict between the purposes of conserving natural beauty and public enjoyment, the conservation of the natural landscape must take priority.

The special qualities of the National Park are listed on page 22 of the Local Development Plan and are derived from the National Park Authority Management Plan 2020-2024 and are listed as: Coastal splendour; Richness of habitats and biodiversity; Diverse geology; Islands; Diversity of landscape; Accessibility; Distinctive settlement character; Space to breathe, Rich historic environment; Remoteness, tranquility and wildness; Cultural heritage; The diversity of experiences and combination of individual qualities.

This principle highlights the responsibility of planning to ensure that development proposals sit gently within the natural landscape of the National Park, and do not detract from its enjoyment.

Siting, Design and Impact upon the Special Qualities of the National Park

Policy 8 of the Pembrokeshire Coast National Park Local Development Plan 2 (LDP2) is a strategy policy which refers to the special qualities of the National Park and lists priorities to ensure that these qualities will be protected and enhanced.

Policy 14 of the LDP2 seeks the conservation of the Pembrokeshire Coast National Park with criteria (a) and (b) resisting development that would cause significant visual intrusion and/or, that would be introducing or intensifying a use which is incompatible with its location. Criteria (c) and (d) resists development that would fail to harmonise with or enhance the landform and landscape character of the National Park and/or fails to incorporate important traditional features.

Policy 29 of LDP2 requires all development proposals to be well designed in terms of place and local distinctiveness (criterion (a)).

Parts of the Pembrokeshire Coast National Park are still relatively undeveloped with minimal impact of lighting on the night sky. Policy 9 seeks to conserve that character and limit the impact of lighting which could negatively impact on the special qualities of the National Park.

The Built Conservation Officer for the National Park has made the following comments: *I note the comments of Nevern Community Council and whilst I have no objection to the principle of rebuilding, the proposed design does not respond well to the prominent site. A rebuild of traditional modest proportions seems appropriate here in the interests of conserving the National Park.*

The first proposal received during the course of this application sought to use a very modern palette of building materials with a contemporary design.

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Upon revisions, certain elements of the design have been altered, principally the materials, to make the building more recessive in the landscape. Some ridge heights have also been reduced to reduce the potential landscape impact.

However, the design proposed does not accord with the policies above to enhance the landform or landscape character of the National Park, and apart from the slate roof, does not incorporate traditional elements of design. It has a somewhat industrial appearance rather than domestic, and as such does not respect the character of the current dwelling or any dwellings in the local area.

The raising of the roof height; the breaking up of the length of the building with different roof materials combined with the further extension of the footprint of the building and the large ground floor areas of glazing does not give rise to a cohesive design which is considered to be sympathetic to this location.

The proposal is considered to be likely to cause significant visual intrusion and to look very much at odds with the surrounding landscape and is therefore contrary to Policies 8 and 14.

It would also fail to meet the aspirations of LDP Policy 29 which requires development proposals to be well designed in terms of place and local distinctiveness and with Policy 30 which states that development should not be visually intrusive or of a scale incompatible with its surroundings.

Access and Parking:

The Highways Authority have been consulted in respect to any potential impact on traffic or highway safety and their comments are copied below.

‘This dwelling is about 380 metres further west than the termination point of the Unclassified Lane, which in turn is about 580 metres further west than Tre-Rhys farm. This means that traffic probably approaches from Croft on the TRA487, and that there will be greater links with St Dogmaels and Cardigan. It is not clear if any means of vehicle access still exist from Ceibwr Bay and Moylegrove, by going over a ford and along the Coast Path route.

The parking/turning area at the end of the driveway will be improved in size’.

Subject to the imposition of a condition requiring parking and turning to be provided prior to occupation the application is considered to comply with Policies 59 & 60 of the Local Development Plan.

Biodiversity:

To comply with Planning Policy Wales (2021) and the Environment (Wales) Act 2016 planning authorities are expected to ensure every development positively contributes to biodiversity.

The PCNPA Ecologist has been consulted with the proposals and with the submitted ecological report and her final comments on the revised scheme will be verbally reported to Committee.

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She has also commented that it will also need to be made a condition of any consent that a lighting scheme is submitted prior to installation and that these details could be included in any revised drawings submitted to avoid the need for further conditions.

Drainage:

The Drainage Engineers at Pembrokeshire County Council have been consulted with the development proposals and have raised no objection. They have confirmed that SAB consent will be required for this development.

Other Material Considerations: Dyfed Archaeological Trust

Dyfed Archaeological Trust have commented that that the site in question lies immediately adjacent to the nationally important Iron Age Promontory fort of Pen Castell (PRN 1043; PE 212). Due to the proximity of these proposals to the historic asset, it is possible that this development may have an impact upon the setting of the statutorily protected monument.

'We note the submitted desk-based assessment in support of this application and can confirm that it meets current requirements. Having now reviewed this document we are in agreement that potential exists for surviving buried archaeological deposits and that further archaeological mitigation is therefore appropriate. In view of the above, it is therefore possible that buried archaeological features could extend into the application area where any ground works for the proposed development could reveal and destroy buried archaeological remains. Consequently, in order to protect potential archaeological interests, we recommend that should consent be given, a WSI condition should be attached to the above application.'

Should the application be recommended for approval, a condition to ensure a written scheme of investigation for archaeology would need to be imposed.

CADW have confirmed that they have no objection to the scheme and believe it will not have an impact on the setting of the Scheduled Ancient Monument.

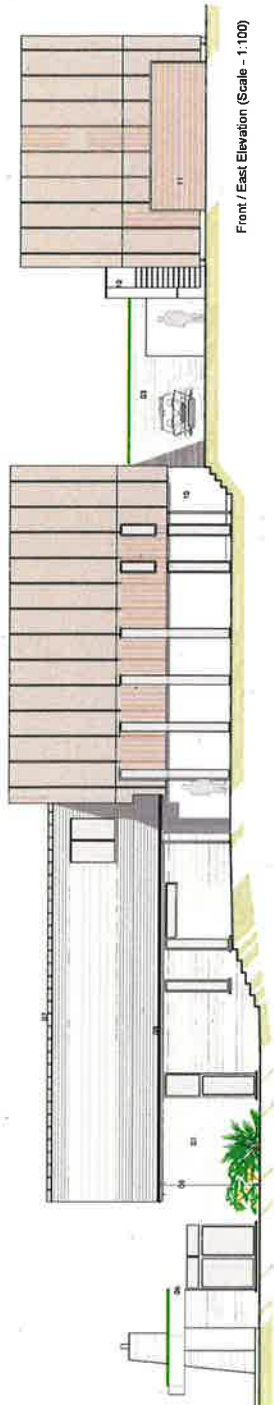
Conclusion

The proposed replacement dwelling fails to enhance the natural landscape and is considered likely to cause significant visual intrusion, and as such is considered contrary to Policies 1, 8, 14, 29 and 30 of the Pembrokeshire Coast National Park Local Development Plan.

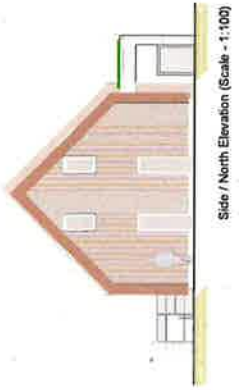
Recommendation

REFUSE, for the following reason(s):

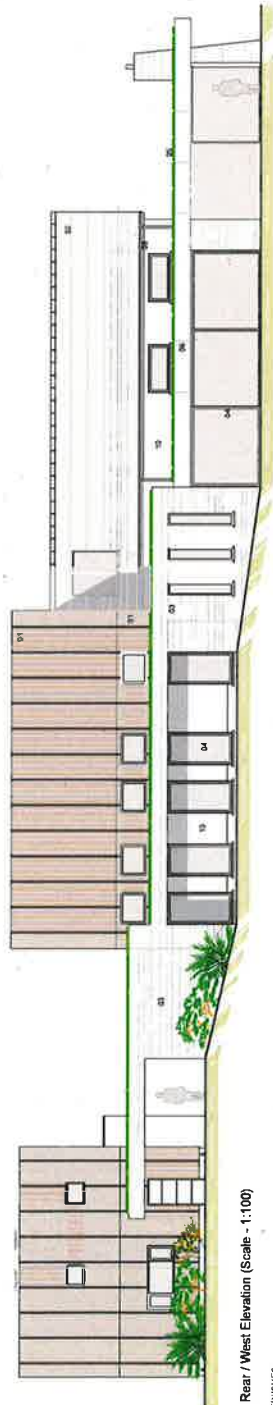
1. The development is located in a prominent and sensitive location, the proposal is considered to be of an inappropriate design, visually inconsistent and lacking any traditional or vernacular design features. It will cause harm to the special qualities of the National Park, contrary to Policies 1, 8, 14, 29 and 30 of the Pembrokeshire Coast National Park Local Development Plan.



Front / East Elevation (Scale - 1:100)

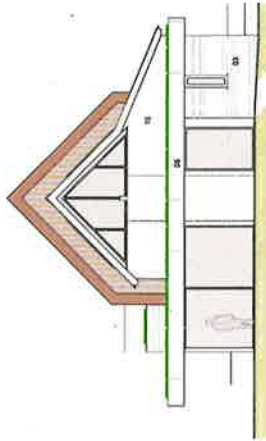


Side / North Elevation (Scale - 1:100)



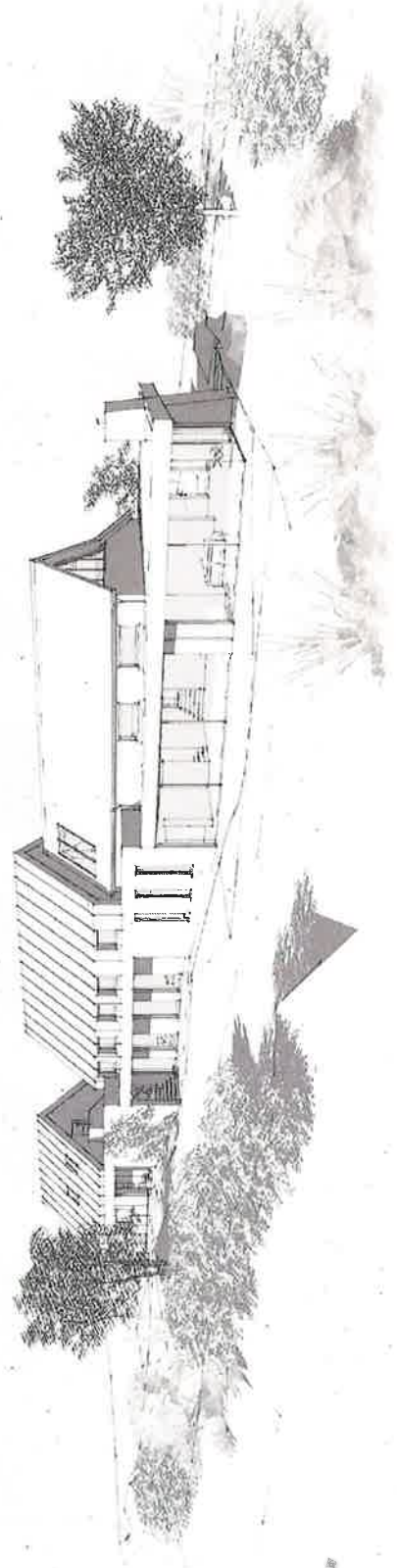
Rear / West Elevation (Scale - 1:100)

- FINISHES
- 01 - Timber Cladding (Vertical)
 - 02 - Timber Cladding (Horizontal)
 - 03 - Concrete Cladding (Horizontal)
 - 04 - Dark Grey Aluminium Window Frames
 - 05 - Dark Grey Aluminium Door Frames
 - 06 - Dark Grey Aluminium Downpipes
 - 07 - Light Coloured Flat Roof Tiles
 - 08 - Dark Grey Aluminium Gutters
 - 09 - Dark Grey Aluminium Downpipes
 - 10 - Light Grey Gutter Liner
 - 11 - Concrete Slab



Side / South Elevation (Scale - 1:100)

REAR (WEST) SKETCH



KINVERCREATIONS LTD
 Mr. James J. Kinver
 82-110th, MCAT ROAD, KIRBY BRIDGES
 1000105, WILTSHIRE, ENGLAND
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 COMPANY CODE
 Company No. 10152471
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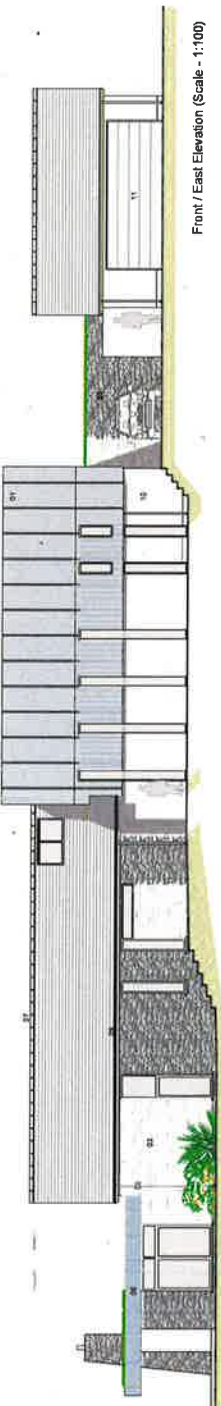
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Author:	
Checker:	
Approver:	

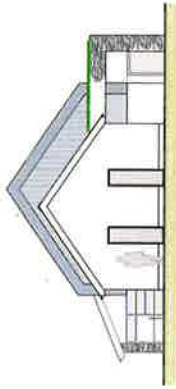
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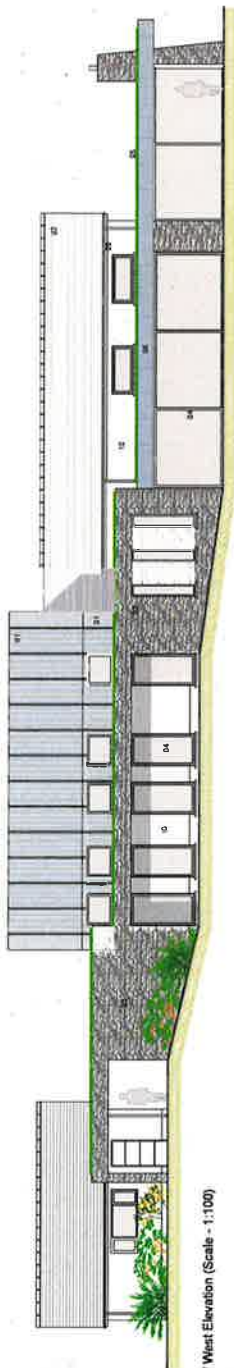




Front / East Elevation (Scale - 1:100)

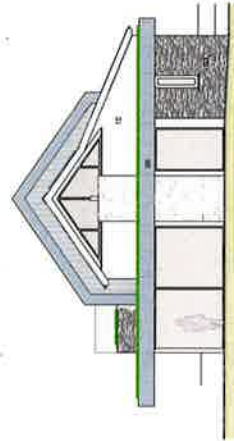


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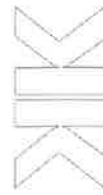
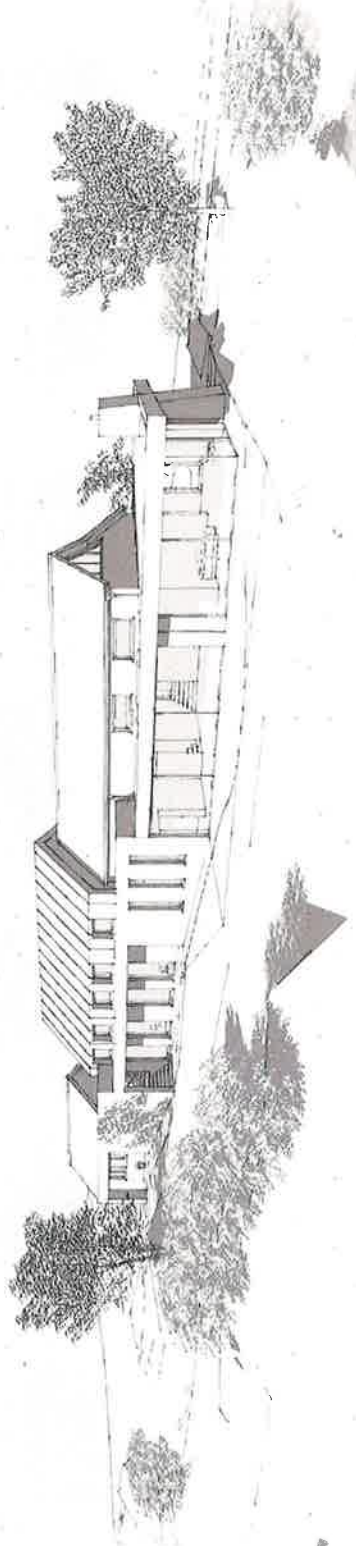
Rear / West Elevation (Scale - 1:100)

- FINISHES
- 01 - External Brickwork - Bricks, Chis
 - 02 - External Brickwork - Stone, Chis
 - 03 - External Brickwork - Stone, Smooth
 - 04 - External Brickwork - Stone, Smooth
 - 05 - External Brickwork - Stone, Smooth
 - 06 - External Brickwork - Stone, Smooth
 - 07 - External Brickwork - Stone, Smooth
 - 08 - External Brickwork - Stone, Smooth
 - 09 - External Brickwork - Stone, Smooth
 - 10 - External Brickwork - Stone, Smooth
 - 11 - External Brickwork - Stone, Smooth



Side / South Elevation (Scale - 1:100)

REAR (WEST) SKETCH



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 Chartered Building Engineer (Public)
 Chartered Construction Manager

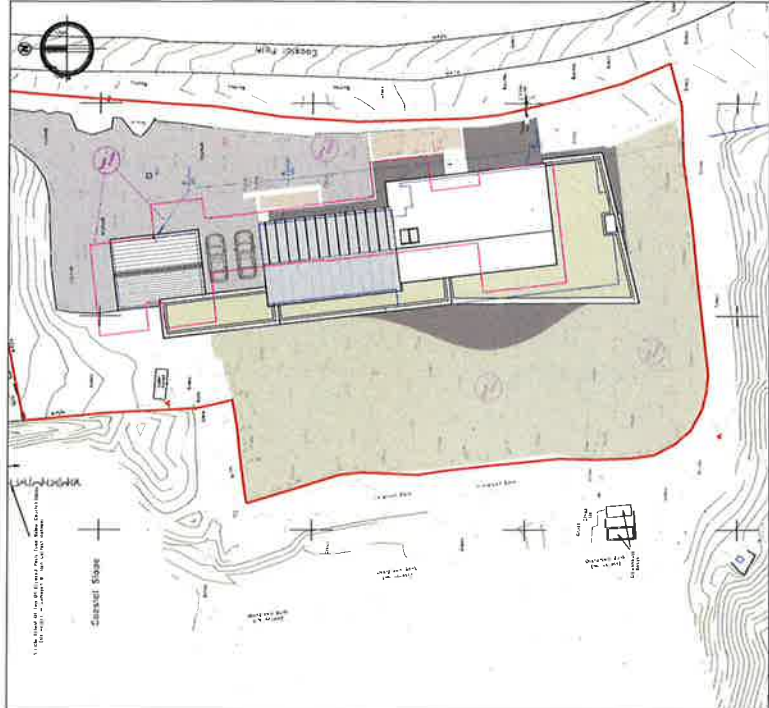
COORDINATOR
 Chartered Building Engineer (Public)
 Chartered Construction Manager

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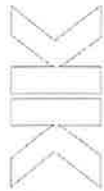
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 Client: [Blank]
 Date: [Blank]
 Drawing Status: **PLANNING**
 Drawing Description: Proposed Elevations





Site Plan (Scale - 1:250)



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Project title: **Perceps**
 Drawing no: **GA03**
 Revision no: **AS SHOWN**
 Drawing date: **2023**
 Drawing scale: **1:200**
 Drawing status: **PLANNING**

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