

PLANNING AND RIGHTS OF WAY COMMITTEE

Report of: Director of Development

Date: 9 September 2008

Application no: 07/1581/PA

Proposed Development: 9 Eco Smallholdings, 1 Community Building,
Seasonal Campsite under Low-impact Policy.

Location: Land at Pont-y-Gafel, Glandwr, Whitland,
Pembrokeshire.

Applicant: Lammas Low Impact Initiatives Limited

1. Main Issues:

The main issues raised by this application are:

- Compliance with Policy 52 of the Joint Unitary Development Plan for Pembrokeshire (Low Impact Development Making a Positive Contribution).
- Compliance with Policy 8 of the Joint Unitary Development Plan for Pembrokeshire (Development and Local Culture).
- Compliance with Policy 100 of the Joint Unitary Development Plan for Pembrokeshire (Access to Development).

2. Description of the site, proposal and planning history:

The application site comprises 31 hectares of land adjacent to the farm complex of Pont-y-Gafel less than half a kilometre from the village of Glandwr. A strip of woodland lies in the northwest section of the site and this runs down to and along the valley of a stream (Afon Gafel) which eventually runs into the Afon Taf. The land slopes down from a height of 185 metres in the north to 155 metres by the farm complex and then continues to fall to the south towards the Afon Taf. The land is predominantly used for grazing and consists of fields bounded by hedgerows. A public footpath dissects the site from west to east. It is proposed to create a new access track to serve the site (separate from the existing access serving the farmstead which is outside the site boundary). The new access track would have a junction with the minor county road which links Glandwr to Llanfyrnach.

The proposal is a full application for 9 eco smallholdings or plots, 1 community building and a seasonal campsite. The small holdings sub-divide the whole site and include residential units, storage barns, workshops and poly tunnels. Wind turbines and solar arrays are described as providing power on some of the holdings supplementing a central supply from a hydro turbine. Water would be supplied from a local spring. Some coppicing on plots and woodland thinning is intended to provide fuel for heating and cooking. Each holding should provide its own food and produce for sale providing for, and substantially meeting the needs of, residents. Five plots will include residential units and the other four households would be accommodated in a terrace. Orchards, livestock and horticulture are the main land based activities. In addition it is intended to run courses and allow paying visitors to the site. The community hub comprises a hall, crèche, greenhouse, storage, kitchen, office, trading post, toilets, shower and covered public area. The hub building would be used for administration, food preparation, to provide indoor space for courses/presentation/classes and as a meeting space. The campsite is intended for visitors accommodating a maximum of 12 tents and would open from 1st April to 1st January each year. The following documents have been submitted in support of the application:

- Overall management plan
- Woodland Management Plan
- Traffic Management Plan
- Permaculture report
- Business Plan
- Community Hub Plan
- Welcome Point Plan
- Terrace Design
- Individual Plot Management Plans

In addition Appendices contain surveys on soil, ecology, water, visual impact, social and economic status, geology, marketing and the local economy. Reports are provided on the hydro-turbine, household needs and the site history.

Planning permission for the development of 9 Eco smallholdings, a community building and a seasonal campsite was refused in October 2007.

Planning permission has been granted for conversion of some of the attractive outbuildings at the Pont-y-Gafel farmstead into 6 residential units.

3. Evaluation:

The application by Lammas is a resubmission of a proposal comprising 9 smallholding plots with low impact residential units, a community

building and a seasonal campsite which was refused at the Planning and Rights of Way Committee meeting of 9 October 2007 (application reference 07/314/PA).

The application was refused on the basis that the proposed development was considered to be contrary to the provisions of three of the criteria set out in Policy 52 and contrary to the requirements of Policy 100. The three criteria of Policy 52 that the proposal failed to satisfy were as follows:

- Criterion 2 - all activities and structures on site have low impact in terms of the environment and use of resources;
- Criterion 6 - the proposal will provide sufficient livelihood for and substantially meet the needs of residents on the site; and
- Criterion 7 - the number of adult residents should be directly related to the functional requirements of the enterprise.

The proposal was considered to be contrary to the requirements of Policy 100 due to the adjacent infrastructure network not having the capacity to serve the development.

Given the specific nature of the reasons for refusal of the previous application, this report will comprise of the evaluation prepared for application reference 07/314/PA updated to take account of the additional information provided to address the reasons for refusal. The County Council commissioned environmental consultants ADAS to provide an assessment of the previous application. The County Council has commissioned ADAS to provide a further assessment in respect of the revised application and this is referred to in the report where necessary.

Policy 52 (Low Impact Development Making a Positive Contribution) and Supplementary Planning Guidance on the policy set the context for considering the application. However it is necessary to view some of the aspects separately from the proposal as a whole, because other JUDP policies also apply. The smallholdings will be considered under Policy 52 and the campsite under Policy 24 (Touring Caravan and Tent Sites). The proposal as a whole must be considered against Policies 8 and 126 dealing with the impact on the social, cultural and linguistic character of the local community. In addition the development must meet the requirements of Policy 100 on access and the ability of the local road network to serve the proposal. The community composting and renewable energy proposals that are part of the scheme also need to be considered against policies 132 (Composting), 62 (Renewable Energy) and 63 (Wind Energy) respectively.

Smallholding plots

Policy 52 – Low Impact Development Making a Positive Contribution and the associated Supplementary Planning Guidance set the context for considering the proposal. The policy has eight criteria that must be met in full for a proposal to be acceptable.

Criterion 1

The proposal will make a positive environmental, social and/or economic contribution with public benefit.

In terms of environmental benefit the SPG on Low Impact Development refers to other Supplementary Planning Guidance issued by the Authority on Biodiversity and Development in Pembrokeshire. The biodiversity SPG suggests that new benefits associated with development can include:

- New water features
- New tree planting (native species)
- New hedge banks and hedges
- Planting native climbing plants, trees, shrubs and wildlife species in landscaping schemes.

The Lammas proposal is intending to provide all of the above including planting 1000 trees, 2000 metres of hedgerow and establishing 9 ponds. There is also a comprehensive woodland plan to improve the existing wooded areas.

Examples of social and economic contributions with public benefit cited in the SPG on Low Impact Development include:

- The provision of skills training;
- Provision of local facilities;
- The provision of services to the community including making natural and locally produced food available;
- Positive health recreational development through public access e.g. opening new footpaths or educational visits through the practical demonstration of more sustainable technology;
- Provision of local employment

The Lammas proposal provides for all of the above by carrying out training in sustainable building techniques, permaculture and other courses, opening up 2 permissive footpaths (1.14 kilometres) linked to the existing public footpath, providing locally produced food and jobs for an office manager, minibus driver and site manager. In addition a community compost scheme and minibus are proposed and access to a “trading post” for local people. However some of the proposals raise concerns that may limit, or present problems, that outweigh their benefits.

Community composting - Pembrokeshire County Council operates a home composting scheme with delivery of compost bins extending

across the County, including Glandwr. A civic amenity site is operated in nearby Hermon which includes the disposal of garden waste. Policy 132 of the JUDP sets the criteria for considering a composting scheme permitting them unless, amongst other things, there is an unacceptable impact on access, traffic generation and the capacity of the local road network. The management plan suggests compost will be collected rather than delivered to the site. This will lead to traffic generation and the Head of Highways and Construction has concerns regarding the impact the proposal, as a whole, would have on the local highway network. It is unclear but appears unlikely that these collections have been accounted for in the traffic targets set out in the management plan.

The revised application omits reference to community composting.

Community Minibus – It is suggested that this will link to Clunderwen Station for visitors, residents and local people. It also mentions use for school runs and visits to markets although it is not clear whether this would be open to non-residents. There is no information on whether it will be a timetabled or dial up service, and which settlements it will connect to. A service just running to Clunderwen is likely to be of limited use to residents of Glandwr and the surrounding area.

The Traffic Management Plan submitted with the revised application states that a service just running to Clunderwen Railway Station has been rejected as an unviable option on the grounds that a direct service from Carmarthen reduces the travel time by 40 minutes each way. The minibus service would now link to the local towns of Haverfordwest, Cardigan and Carmarthen. In addition clarification has been provided that the service would be open to non-residents. Information in the form of a timetabled service is provided and this indicates settlements that the service would connect to.

Trading Post – There was no detail in the original application on what precisely was meant by a trading post i.e. whether it was a shop or whether it was intended to swap/barter goods and what products will be available, although it is suggested that it will be open to the wider public. More detail was needed in order to assess what policy it could be considered against, but the main considerations were likely to be the impact on nearby retail facilities and impact of increased traffic. The Business Plan submitted with the revised application states that the trading post will provide an opportunity for residents to sell produce to visitors, other residents and guests. It is intended that it would be open in the afternoons of open days (twice a week during the winter and five times a week during the summer). A wide range of produce from the site would be featured and local producers would be welcome to use the facility.

Employment – The benefits of providing employment need to be balanced against the impacts in terms of traffic generated to and from

the proposal and the functional needs test. It is suggested that a minibus driver, office manager, site manager, disability worker (and possibly team) and part time woodland workers may be required.

Highways officers expressed concerns over the level of traffic likely to be generated but now the movements of the workers described above have been factored into the transport targets. The proposed Traffic Management Plan states that whenever selecting staff for various jobs at the Eco Village Lammas would take into consideration where the applicant lives and whether they are able to travel to the site by sustainable means. The proposal also suggests that there will be construction traffic and workers (numbers unspecified) involved in the first years two and a half to three years of the proposal to build the residential and community buildings. Such a heavy reliance on outside assistance to make the proposal work calls into question whether the proposal can be considered low impact at all. This is considered in more detail under criterion 2.

Affordable housing – The Lammas management plan suggests that the scheme will provide affordable housing. However the definition of affordable housing in the Joint Unitary Development Plan policies and Appendix 3 of the Supplementary Planning Guidance on Affordable housing make it clear that affordable housing is that which is for sale or rent below market cost in perpetuity available for local people in unsuitable accommodation who are unable to meet their needs on the open market. The housing provided by Lammas does not meet local need and is therefore not affordable housing, that meets the Councils definition.

Training and education – Accepting that training and education are benefits, all the training appears to be based on site despite traffic generation being a potential problem acknowledged by Lammas in their management plan. Whilst some training will inevitably be required on site the potential for lower impact techniques such as videos, training manuals and on-line courses do not seem to have been explored.

Notwithstanding the above comments overall the proposal can be said to meet criterion 1 but further information on some of the potential benefits is needed.

Criterion 2

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

The SPG defines what is meant by low impact under six bullet points. These are outlined below with a commentary on whether the Lammas proposal fits the definition.

- Development will be expected to provide their own water, sanitation and energy on site and not rely on use of mains sources.

Water

ADAS raised concerns over whether the proposal overall can be water self sufficient.

The revised ADAS report states that the updated water survey report, which suggests that there is sufficient water to supply the project, contains mostly hearsay advice. ADAS recommends a comprehensive water survey be carried out to ascertain the exact volume of water available to supply the site.

Sanitation

This is intended to be compost toilets and grey water recycled or treated by reed bed. A report by ADAS raised the issue that careful attention will need to be given to ensuring that reed bed treatment does not allow grey water to contaminate the spring.

Energy

The Management Plan states that it is possible that a hydroelectric unit could provide most of the electrical energy requirements of the site and goes on to say that households will use windmills and solar panels to supplement electricity provided by it. Individual plot management plans for plots 5, 7, 8 and 9 mention sourcing energy from the hydro turbine with supplementary sources. A report on the Hydro turbine was submitted with the application. The report states that “after discussions with the current scheme owner, it seems possible that they may want to retain the hydro scheme and refurbish it for their own use. Thus the scheme may not become for available for the community”. The report also states that it is not possible to assess the exact potential of the scheme because the amount of water that the Environment Agency will allow to be extracted to run the turbine isn’t known. The amount of water feeding through to the turbine will impact on the amount of energy that can be produced. The conclusions further state that refurbishment minus grid connection charges will be around £102,000 and feasibility will depend on 70% grant funding. It is not clear whether grant funding can be secured and whether it could meet 70% of costs. Finally a supplementary comment at the end of the report regarding assumptions about the running speed and its effects on the turbines bearings casts doubt on whether the turbine can cope at such speeds and that operating costs are likely to be higher than stated, commenting:

“This obviously has very severe consequences for the reliability and operating costs of the turbine and must be considered very seriously.”

There is therefore some doubt that under the current proposals the residents can be energy self sufficient. However the overall management plan states that if its found to be unviable residents will use micro-generation from wind and solar to provide for their needs.

The Hydro Report submitted with the revised application states that further to previous studies by Dulas and Derwent Hydro, a survey of the existing hydroelectric installation was carried out on 19th October 2007 and enquiries made with the Environment Agency regarding requirement for licensing. The report's conclusions are that the existing leat pipeline and turbine are in serviceable condition and that refurbishment when added to the inclusion of a smaller system for low flow conditions would cost £33,000. Although the report refers to there being no abstraction licence and that such a licence would not be required, provided there are no changes to the leat weir and inlet, the Environment Agency advises that an abstraction licence is likely to be required and this could affect the annual power generation estimates cited in the Hydro report.

- **Buildings are to be constructed from materials that are recycled, reusable, and have low embodied energy or are from sustainable sources.**

The buildings proposed by Lammas are intended to be from mainly locally sourced wood and use recycled materials where possible and meet this requirement.

- **Traffic generation targets must be well below what would be expected from a similar development operated in a conventional way.**

The Lammas management plan includes a traffic reduction scheme. However it is unclear whether this includes trips associated with the community composting scheme and trips generated during the construction phase and by seasonal and full time workers that are not resident on site once the scheme is running. It does not take account of, and cannot control casual visitors to the scheme. Highways officers are of the opinion that the local highway network cannot sustain the likely amount of traffic that will be attracted to the scheme and in this context it is not considered that the proposal will have a low impact.

The revised application includes a Traffic Management Plan which outlines how Lammas will ensure that traffic to and from the eco village is kept to a minimum. The Traffic Management Plan is intended to be a working document which would be reviewed, appraised and amended as required. The Head of Highways and Construction has recommended that any permission includes conditions in respect of the implementation of the Traffic Management Plan.

- **The development satisfies criterion 4 in terms of landscape impact.**

This issue is discussed under criterion 4 in detail but the proposal is considered to meet the criterion.

- **The project must be reversible, insofar as new buildings can be easily dismantled and the land easily restored in the event of the collapse of the project.**

The buildings are a variety of different structures some of a more traditionally low impact style such as roundhouses but most of the residential buildings, and the community hub, are designed to be permanent structures requiring outside professional help in their construction. They are described as being reversible in that they can be removed and the land restored to its previous state, but this can be said of almost any building. Pembrokeshire County Council's Supplementary Planning Guidance Building in a Sustainable Way (5th December 2005) requires all buildings to be constructed with sustainability in mind. For a building to be considered low impact it should go beyond those standard requirements. The amount of labour, materials, time, and permanent nature of some of the buildings proposed by Lammas suggests that they may not necessarily be considered low impact.

- **The development must be of a scale no greater than is necessary to meet the needs of the development.**

The scale of the proposal is ambitious and Lammas claim it is necessarily so in order to prove that low impact development can work. However the scale of the proposal in terms of its activities and building proposals are demonstrably beyond the capacity of the residents and cannot be said to meet the above requirement. As mentioned, under criterion 1, providing local employment is a legitimate benefit but the proposal is close to a small village which is unlikely to be able to supply all the labour required. Employees will most likely need to commute some distance to work, probably by car, increasing trip generation and putting further pressure on the local road network. Also there appears to have been limited effort to minimise the amount of structures on the site by sharing workshop, storage and polytunnel space, although some concession has been made to reduce the number of buildings through the terrace design and food preparation area at the hub.

Criterion 3

Opportunities to re-use buildings which are available in the proposals area of operation have been investigated and shown to be impracticable.

There is potential for conversion of outbuildings at the Pont-y-Gafel farmstead to residential use. Planning permission for this has recently

been approved as described above. The farmstead is close to the application site, but outside it, and the applicants state that these buildings are not available to them. The reasons for this are however not fully explained and there is therefore doubt about compliance with this criterion.

The revised application provides further information in respect of the existing outbuildings at Pont-y-Gafel farmstead citing the owners reluctance to dispose of the buildings with planning permission for residential purposes. In addition the suitability of such buildings for low impact development is questioned on the basis of the pressure which would be put on the land holdings to produce enough income to finance such property.

Criterion 4

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

A detailed landscape impact assessment was submitted with the application including reference to LANDMAP a landscape assessment tool used by this Authority. LANDMAP defines the value of the landscape and recommends management requirements to preserve and enhance it. Preservation of hedges and field boundaries and woodland management are identified as management requirements in the proposal location and these have been proposed by Lammas with additional planting for screening. Turf roofs are proposed for most buildings and plot layouts have taken account of the need to minimise visual impact. Small domestic scale wind turbines are proposed. Much of the site is located on land which is higher than the public roads in the area and above the village of Glandwr. There would accordingly be limited public views of the site from close by (apart from the public footpath through the site). There would be distant views from the A478 road south of Crymych but over a distance of about 2 kilometres. Overall it is considered that the proposal meets the requirements of criterion 4.

Criterion 5

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

The proposal involves horticulture, agriculture, animal rearing, and coppicing and woodland management with secondary activities using those resources for craft activities and therefore requires a countryside location and complies with the criterion.

Criterion 6

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

The County Council commissioned environmental consultants, ADAS, to provide some expert opinion on whether the proposed crop types and yields were suited to the area and realistic in the context of assessing whether plot owners can substantially meet their own needs from the site. The report concluded that there was insufficient information submitted with the applications to make that assessment. The Supplementary Planning Guidance requires that 75% of basic household needs must be met by year 3 of the project or as close to that target as possible with reasons why a shorter time scale is not appropriate. The Lammas management plan states that in 3 years 30% of needs will be met rising to over 75% after 5 years. There is no clear justification for not meeting the 3 year target or why the initial 30% target is set so low. Elsewhere in the management plan it is suggested that much of the first year on site will involve construction and the plot 5 individual management plan suggests the first year will be spent observing the land to assess its permaculture potential. Given the importance of proving that the proposal can be largely self sufficient and the fact that permaculture, soil, geological, hydrological and other surveys have been carried out there appears no justification for observing the land or delaying the horticultural and other land based activities in favour of an initial construction phase.

The individual management plans suggest that some residents may need to work off site to supplement their income.

They include:

- Plot 3 the possibility of doing building work locally and acting as a local facilitator.
- Plot 6 management plan mentions a resident's passion for education benefiting the LEA. There is no explanation of how and whether this will involve working off site.
- Plot 9 mentions a resident working off site as a nurse to supplement their income.

As there is some doubt that that the proposal will provide sufficient livelihood and substantially meet the needs of residents the proposal does not meet the requirements of criterion 6.

The revised ADAS assessment makes the following conclusions about the additional information submitted with the revised application:

- the figures used in the budgets have been optimistic in terms of sale values and in some cases yields of products grown or reared on the holdings;
- some of the figures used are derived from highly intensive production whereas organic and permaculture type systems tend to take a yield and quality penalty in order to lower external inputs;

- in the opinion of ADAS most of the day to day living costs have been underestimated when compared with figures recorded by Poverty Action and the Joseph Rowntree Foundation Association;
- In the opinion of ADAS only two plots can meet the 75% 'basic needs' requirements of criterion 6 of Policy 52, with the added value part of the business instrumental in achieving the target.
- The functional needs assessment shows in all cases the total hours requirement for the agricultural and horticultural elements amount to between 0.2 and 0.6 man year requirements per plot. If figures are doubled to allow for a more labour intensive regime only one plot (plot5) would require one labour unit;
- The time spent adding value to produce does not depend on being based on the holding and could be carried out off site;
- The site and hub development figures are highly dependent on sourcing additional capital and as such the business plan is speculative in terms of assumptions and therefore financially insecure;
- The plot plan allows for 6 vehicles on site but no accounting has been made for the vehicle pass licence in the individual plans which have been included in the hub development plan;
- ADAS suggests that the value of wood products which could be made from harvesting be appraised by an experienced wood craftsman to provide an opinion on the proposal for plot 9;
- Only one cash-flow produced (plot 8) has included personal needs and other income sources;
- ADAS considers that the individual business plans will require an additional source of off-site income or finance to support the proposal and maintain viability of the project.

Based on the revised assessment carried out by ADAS it is considered that the proposal still fails to provide sufficient livelihood and substantially meet the needs of residents. As such the proposal does not meet the requirements of interim 6.

Criterion 7

The number of adults should be directly related to the functional requirements of the enterprise.

The ADAS report suggests that there is insufficient evidence to assess the functional need for the number of adults proposed on site.

The Plot 3 management plan suggests that one adult will work on site with the other continuing to work with the Welsh Assembly Government for 3 years, becoming resident at a later date. This suggests that there may only be a functional need for 1 adult on this plot and not two. It will not be acceptable for people to move on to the site that are not functionally necessary to its operation. Also any income generated by a partner must not count towards meeting the basic household needs of the Plot. A number of plot management plans also suggest, or imply, that residents may supplement their income by working off site as discussed above.

Criterion 7 is intended to ensure that all residents are necessary for the functioning of the proposal to prevent people who do not need to be there, living as residents. Also it is intended to ensure that the site can sustain the residents without the need for them to commute and work elsewhere. Whilst it is accepted residents will need to shop, sell their produce and travel for other reasons commuting to work from the site is not an option.

It is not clear from the supporting information whether all the adults resident on site are directly related to the functional requirements of the proposal and it appears that some may need to commute to work. The proposal does not therefore meet the requirements of criterion 7.

Although the revised application includes additional information relating to the functional needs of the enterprise the revised report prepared by ADAS raises concerns regarding the potential of the development to support the number of adults involved in the scheme. As such the proposal is still considered to fail to meet the requirements of criterion 7.

Criterion 8

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

A co-operative has been set up to run the proposal and it therefore complies with this criterion

The Campsite

Policy 24 of the JUDP requires tent and touring caravan sites to be well related to a settlement. This means that it should be visually and physically connected to a settlement. The campsite does not fit as part of the village being separated by fields and visually distinct from it, although connected by a footpath. Although approval for the campsite would be a departure from the policy, seen as part of the overall proposal it would provide visitor accommodation on site thus preventing those attending courses, or visiting, from travelling to and from the site and generating traffic. Food would be available on site and visitors encouraged to use public transport. In this context it would make sense for limited camping provision to be provided on the site and justify a departure from Policy 24.

Social Fabric of Glandwr

Policy 8 of the JUDP requires development to take account of the social, cultural and linguistic characteristics of the local community and Policy 126 does not permit development that would prejudice the interests of Welsh Language within the community. It also allows for phasing to ensure gradual absorption of new development in the community. Lammas have produced a Welsh Language Policy in their management plan with respect to written communication, signage and translations at meetings. They have stated that they will work with Menter Iaith Sir Benfro, a Welsh language organisation that promotes the language in Pembrokeshire, on monitoring that Policy. Also some proposed plot residents have expressed an interest in learning the Welsh Language. However a more robust commitment to learning Welsh within the Lammas community would be more beneficial. The proposal in its current form is quite inward looking with the positive benefits described in the individual plot management plans extending to other members of Lammas rather than the wider community. The community hub is essentially for the use of Lammas residents not “the public” and other benefits to the local community such as a minibus to local towns and community composting are at best marginal. The proposal should provide a description of how it intends to monitor the effectiveness of its Welsh Language policy and consider improved benefits for the local community. Nevertheless the ethos of the development includes community engagement. However, overall the scale of the development in terms of potential traffic generation, numbers of visitors and residents will inevitably impact on a small village like Glandwr. A location closer to a larger settlement, or a scaled down proposal would be more suitable with meaningful targets with regard to Welsh Language and community engagement and careful monitoring of the effect on the local community.

Tourism

The proposal to some extent relies on and seeks to attract visitors. Policy 19 of the JUDP deals with tourist attractions. The policy requires that the development respect its surroundings, if it is in a rural

location that a countryside location is essential, it would result in a net contribution to the local economy, complements existing provision and doesn't generate traffic inappropriate to the character of access roads. The proposal fulfils the first two requirements. It may also make a net contribution to the local economy although it is accepted that this may be small and as there is no similar type of attraction in the area it will not compete and therefore could be said to complement existing provision. However it may generate inappropriate traffic levels as already discussed.

Renewable Energy

The proposal involves power generation from a number of sources including solar, wind and hydro. Policies 62 and 63 of the JUDP are relevant. They require development should not harm built, historic or natural environment, local amenity and landscape. There is limited information on the exact number and type of photovoltaic arrays and turbines. Some plot management plans suggest that these will be domestic scale turbines but more information on hub height, blade size and output is needed to consider them. Whilst it is unlikely that the renewable energy technologies will have any significant adverse impacts they cannot be assessed until more information is provided.

Conclusion

The proposal meets criteria 1, 4, 5 and 8 of Policy 52. It is considered that the development does not meet criterion 2 because of its scale. The type, number and construction of buildings in terms of labour and technical expertise are not considered low impact. Visitor and employee numbers suggest a scale of development that may be too high to be sustained by the proposal or nearby village. Glandwr has few services (no shop, school or post office), is not well served by public transport and is unlikely to have a sufficient pool of labour to serve Lamas needs.

There is doubt about compliance with criterion 3 of Policy 52. There is also some doubt that the proposal can meet criteria 6 and 7 of Policy 52. Nevertheless the SPG allows a proposal time to prove that it can meet these criteria by setting targets and putting in place a monitoring process to ensure they can be met. These requirements can be by planning condition or legal agreement and subsequently enforced with failure to meet them ultimately resulting in the overall proposal being dismantled. However the Lamas proposal does not provide sufficient information, particularly on a plot basis, with regard to yields and annual production targets to assess progress towards becoming substantially self sufficient. Lamas set a target for achieving self sufficiency at five years, rather than the three years required in the SPG.

In the revised application, justification is given for the longer target date of 5 years for achieving self sufficiency in terms of 5 reasons.

1. The nature of permaculture involves a period of observation which should last for a minimum of 12 months.
2. A key feature of permaculture is the use of perennials and this will take longer than 3 years to establish.
3. It is suggested that there is an extensive body of research which demonstrates that land based businesses take time to establish.
4. The depressed nature of the rural economy means that it is difficult to derive income from land.
5. The conditions on the site, in terms of elevation and quality of soil, provide evidence of the need to extend the period within which the project will reach the 75% target.

Notwithstanding the 5 reasons given, the failure to reach the 75% target by the third year is considered to be such that the proposal fails to comply with the advice set out in the relevant SPG and criterion 6 of Policy 52. In addition, the conclusions of the ADAS assessment of the revised proposal, in respect of the functional requirements of the holdings, are such that the proposal fails to comply with criterion 7 of Policy 52. These shortcomings in evidence are considered sufficient cause for concern to recommend refusal. Having regard to all material considerations there are no issues which affect the recommendation that the application be refused.

4. Recommendation:

It is recommended that the application be REFUSED for the reason set out in Annex A.3

Annex

A.1 The Development Plan/Other Considerations

A1.1 The Joint Unitary Development Plan.

Policy 8 Development And Local Culture

All development should take account of the social, cultural and linguistic characteristics of the local community.

Policy 19 Other Tourist Attractions

Other tourist attractions will be permitted where:

- i) the scale, siting and design of the development respect the character of its surroundings; and**
- ii) it would not generate traffic of a type or amount inappropriate to the character of access roads or require improvements that would damage the character of those roads, or the area through which they pass; and**
- iii) it is either part of a farm diversification scheme, or involves the conversion of a building or lies within or adjacent to a settlement or if in a rural location it can be demonstrated that a countryside location is essential; and**
- iv) it would result in a net benefit to the local economy; and**
- v) it complements the existing provision.**

Policy 24 Touring Caravan And Tent Sites

New touring caravan sites or new tent sites, or extensions to existing sites will be permitted where:

- i) the site is outside the Pembrokeshire Coast National Park and the area south and east of the A477(T)/A4075 and the B4319; and**
- ii) the location is well related to settlements.**

Policy 52 Low Impact Development Making A Positive Contribution

Low impact development that makes a positive contribution will only be permitted where:

- i) the proposal will make a positive environmental, social and/or economic contribution with public benefit; and**
- ii) all activities and structures on site have low impact in terms of the environment and use of resources; and**
- iii) opportunities to reuse buildings which are available in the proposal's area of operation have been investigated and shown to be impracticable; and**
- iv) the development is well integrated into the landscape and does not have adverse visual effects; and**
- v) the proposal requires a countryside location and is tied directly to the land on which it is located, and involves agriculture, forestry or horticulture; and**
- vi) the proposal will provide sufficient livelihood for and substantially meet the needs of residents on the site; and**
- vii) the number of adult residents should be directly related to the functional requirements of the enterprise; and**
- viii) in the event of the development involving members of more than one family, the proposal will be managed and**

controlled by a trust, co-operative or similar mechanism in which the occupiers have an interest.

Policy 62 Renewable Energy

The generation of power from renewable resources will be permitted where:

i) no significant harm would be caused to the built, historic or natural environment; and

ii) there will be no significant adverse impact on amenity arising from the scale or appearance of the development and/or any resultant air

or water pollution, noise or motor vehicle traffic; and

iii) there is no significant adverse impact either individually or cumulatively to important landscapes, especially those within or close to the boundaries of the Pembrokeshire Coast National Park; and

iv) there will be no significantly adverse impact on agriculture or forestry

Policy 63 Wind Energy Development

Wind energy development will be permitted where:

i) there is no significant damage to the built, historic or natural environment; and

ii) there will be no significant adverse impact on the amenities of local residents arising from either the scale, appearance or layout of the development, or any resultant noise, safety risk or shadow flicker; and

iii) there is no significant adverse impact either individually or cumulatively to important landscapes, especially those within or close to the boundaries of the Pembrokeshire Coast National Park; and

iv) ancillary works and structures are minimised; and

- iv) **new links to the electricity grid are placed underground where they would cross visually prominent and sensitive areas.**

Policy 126 Welsh Language

The Welsh language is an important component in the social, cultural and economic life of many communities within the county. Development of a nature, type or scale that is likely to prejudice the interests of the Welsh language within the community will not be permitted. Phasing may be required to allow for the gradual, natural absorption of new development in the community

Policy 132 Composting

Proposals that involve the composting of organic material will be permitted unless there would be an unacceptable impact on any of the following:

- i) **the amenities of the local area and local communities in particular with regard to access, traffic generated, noise, vibration, dust, odour, safety nor adversely affect all existing surface and groundwater resources; and**
- ii) **the capacity of the local road network and provided there is provision for landscaping and/or screening of the site, there are adequate steps to deal with leachate and the product has added value.**

A.1.2 Other material considerations/weight attached

Supplementary Planning Guidance – Low Impact Development Making a Positive Contribution – Adopted 26th June 2006

Supplementary Planning Guidance - significant weight Biodiversity in Pembrokeshire February 2007

A.2 Consultation Responses

- A.2.1 **Head of Highways & Construction (Highways) - Conditional Approval**
- A.2.2 **Head of Highways & Construction (Drainage) - Provide advice regarding disposal of surface water through soakaways or other sustainable method.**

- A.2.3 Environment Agency
- No objections in principle. Provide information on requirements with respect to water resources, hydrology, environment management, flood risk and fisheries.
- A.2.4 Crymych Community Council
- Object on the basis that the development would be uncongenial for the area and that if the proposal was approved it would be difficult to control other proposals of this sort.
- A.2.5 Pembrokeshire Coast National Park Authority
- Sustain previous objection:-
The proposal does not demonstrate a positive contribution in terms of how biodiversity will be protected and enhanced on the site. The fragmentation of the site and patchwork of uses and buildings will have an adverse visual effect on the local landscape. There is some doubt that the proposal fits with the requirement that the residents livelihood is met on site.
- A.2.5 Head of Public Protection
- No objections but recommend that the applicants consult the Environment Agency and apply for a discharge consent with regard to the disposal of liquid foul

waste. The 9 holdings should provide justification for the 9 dwellings in the normal way and if approved should have permitted development rights removed.

A.2.6 There were a total of 984 representations of which 865 were in support of the application and 119 objections. The responses are summarised below.

Support

Provision of affordable housing
Assists rural regeneration
Addresses climate change
Promotes sustainable development
Conserves traditional skills and promotes local crafts
Promotes locally grown food
Lowers car dependency
Promotes sustainable living
Promotes community involvement
Improves local soil, biodiversity and natural environment
Provides employment
Supports local shops and services
Attracts visitors
Reduces carbon emissions and showcases renewable technologies
Ensures careful use of resources
Provides a positive role model for future generations
Shows transparency in its management
Project is a template that will inspire other similar schemes

Objections

Increases traffic with a negative impact on the local road network
Proposal is unrealistic failing to take account of soil and local climatic conditions
Detrimental affect on the local community and welsh language
Potential pollution from smoke, litter and sewage
Doesn't provide affordable housing or benefit local community
Plots are too small to sustain livelihood
Biodiversity, habitat and woodland would be harmed
Departure from current planning policy and contradict previous planning decisions
Visual harm
Limited water, fuel and sewerage capacity cannot sustain development
Use of tyres in construction and poly tunnels are not eco-friendly

Sanitation health and safety fears
No near access to major settlements and amenities
Public transport limited and won't be served/supported by development
Will overstretch local services e.g. medical facilities
Pets will affect local livestock
Open floodgates for similar proposals
No capacity in village for potential increase in demand for parking
Site has flood potential
Animal welfare concerns
Noise – machinery (agricultural)
Using Greenfield land
Financial viability unclear

In addition representations were received from

CPRW - objection:- on the basis Of non-compliance with JUDP Policy 52, the lack of social gain to the local Area and the disbenefits associated with a “closed” community.

AM for Mid & West Wales - support

A.3 Reason for Refusal

- The proposed development is contrary to the provisions of Policy 52 failing to adequately meet criteria 2, 6 and 7 in that some of the activities and structures on the site are not low impact, the proposal may not be able to provide sufficient livelihood for the residents without working off site and not all adults are necessarily required for the proposal to function.
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Background Documents:

- Consultation response from the Head of Highways and Construction
- Consultation response from Crymych Community Council
- Consultation Response from Environment Agency
- Consultation Response from Pembrokeshire Coast National Park Authority
- Consultation response of Head of Public Protection
- Consultation Response from Quality Pembrokeshire Unit
- 982 responses by letter and e-mail
- ADAS Initial assessment of data submitted by Lammas for the proposed low impact development at Pont-y-Gafel, Glandwr, Pembrokeshire.
- ADAS revised assessment