

The Farmhouse, Dan Y Darren Farm, Cwmtaf

Planning Statement

25 November 2024

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Contents

1.0	Introduction	1
	Structure of Report	1
2.0	The Site and Surrounding Area	3
3.0	Proposed Development	7
4.0	Pre-Application Advice	9
5.0	Planning Context	10
	Planning History	10
	Statutory Development Plan	10
	National Planning Policy and Guidance	11
6.0	Planning Policy Analysis	12
	Principle of Development	12
	Landscape and Visual Impact	15
	Ecology and Biodiversity	15
	Trees	17
	Foul and Surface Water Drainage	17
	Transport and Access	18
7.0	Conclusion	19

1.0 Introduction

- 1.1 This Planning Statement, including Management Plan, has been prepared by Lichfields on behalf of our clients, Adam and Jenny James-Wilkinson, to accompany a full planning application that seeks approval for the proposed development at The Farmhouse, Dan y Darren Farm, Cwmtaf, CF48 2HP within Bannau Brycheiniog National Park.
- 1.2 The site owners are looking to diversify their existing market garden and craft business to add low impact tourism accommodation and to provide dedicated workshop space for crafts. They are also looking to provide improvements to their private garden area for household use.
- 1.3 The following description of development is proposed:
- “Erection of holiday accommodation pods, amenity pod, and workshops, with associated decking; siting of yurt; erection of timber canopy and polytunnel; installation of swimming pool; installation of roof-mounted solar PV panels; change of use of parcel of agricultural land to residential curtilage; and associated works including access, car parking, hard and soft landscaping, and drainage infrastructure.”*
- 1.4 This Planning Statement assesses the planning considerations associated with the proposed development in the context of national and local planning policy and guidance.
- 1.5 This Statement should be read in conjunction with the following plans and documents that also make up the planning application:
- 1 Planning Application Form and Certificate of Ownership
 - 2 Drawings Package
 - 3 Design Statement, including approach to Landscape and Visual Impact and Green Infrastructure Statement
 - 4 Ecology Assessment
 - 5 Arboricultural Report
 - 6 Drainage Strategy Technical Note
 - 7 Transport Statement
- 1.6 A full list of submitted drawings and documents, including references, is provided within the enclosed covering letter at Annex 1.

Structure of Report

- 1.7 The structure of this Statement is as follows:
- Chapter 1 – Introduction;
 - Chapter 2 – The Site and Surrounding Area;
 - Chapter 3 – Proposed Development;
 - Chapter 4 – Pre-Application Advice;

- Chapter 5 – Planning Context;
- Chapter 6 – Planning Policy Analysis;
- Chapter 7 – Conclusion.

2.0 The Site and Surrounding Area

- 2.1 The Farmhouse, Dan Y Darren Farm, is located within Bannau Brycheiniog National Park (BBNP).
- 2.2 The site, which measures approximately 0.7ha, forms part of the smallholding at The Farmhouse, Dan Y Darren Farm to the north of the dwelling. It includes the garden area for the dwelling and the field beyond, which is currently separated from the garden by a wire and post fence.
- 2.3 Within the existing residential curtilage for the dwelling, the site includes a stable and above-ground swimming pool. The agricultural field to the north of the curtilage includes an open-sided shelter.
- 2.4 The site is bounded by the A470 to the east, woodland to the west with the River Taf Fawr beyond, and woodland to the north. The site slopes from east to west.
- 2.5 The site is accessed from the A470 via a short access lane/drive, which adjoins a c.35m concrete road/layby at the southern boundary of the site. There is a second access from the layby to the A470, 25m south of the access to The Farmhouse, Dan y Darren Farm.
- 2.6 The neighbouring property immediately to the south of the site at The Barn, Dan y Darren Farm includes a residential dwelling and business premises for S Tranter Maintenance Services Ltd, which include an office and storage.
- 2.7 The local area includes a small number of other holiday accommodation uses, including Grawen Caravan & Camping Park, a touring and camping site, c.2km to the north, and Lwyn Onn Guest House c.2.5km to the north, which overlooks the Llyn-on Reservoir.
- 2.8 A public footpath (ref: 45/31/1) runs from the opposite side of the A470, to the east of the site, up the valley side to Cefn-coed-cymmer, Merthyr Tydfil.
- 2.9 The nearest local shops, cafes, takeaways and pharmacy are located c.2km to the south east of the site, along High Street in Cefn-coed-cymmer, Merthyr Tydfil. Bus services are available hourly from High Street, Cefn-coed-cymmer to Merthyr Tydfil bus station and Pontsticill (route 25).

Landscape and Visual

- 2.10 A Design Statement, including approach to Landscape and Visual Impact and Green Infrastructure Statement, prepared by Benham Architects, accompanies this planning application. The Design Statement includes photographs of the site from public routes and vantage points.
- 2.11 The Design Statement notes that the site is located in Landscape Character Area (LCA) 8: Talybont and Taff Reservoir Valleys, which includes reservoirs and steep sided, dark green forested valleys. It sets out that, between the reservoir valleys are more open ridges of upland moorland which have long views across the reservoirs and their surrounding forests. The local area in the vicinity of the site includes the built elements of the A470, the existing dwelling and outbuildings, and the neighbouring dwelling and business premises.

Ecology

- 2.12 An Ecology Assessment (EA), prepared by Ecology Planning, accompanies this planning application. The EA provides the results of a desktop background data search, an extended Phase 1 habitat survey undertaken in January 2024 and bat and reptile surveys undertaken in summer/autumn 2024.
- 2.13 The EA sets out that there are two statutory designated sites in the vicinity of the proposed development:
- 1 Penmoelallt Site of Special Scientific Interest (SSSI) - 275m to the west of the site; and,
 - 2 Darren Fach SSSI to the north east of the site on the opposite side of the A470.
- 2.14 The EA notes that there are three non-statutory sites in the area:
- 1 Dan y Darren Wildlife Site – opposite the site across the A470;
 - 2 Cwm Taf Fawr SINC – c.575m to the south of the site; and,
 - 3 Cilsanws SINC – c.550m to the south east of the site.
- 2.15 The EA identifies the southern area of the site as species-poor semi-improved grassland, which is regularly managed. The northern parcel is identified as grassland which is managed more infrequently; it states that this represents the only habitat of value – albeit its condition is diminished. The north eastern corner of the site is identified to include a small area of dense bramble *Rubus fruticosus* scrub. An overgrown hedgerow, resembling a tree line, is identified at the eastern boundary. It states that the sloping bank to the west of the site accommodates mature trees set in grassland, which is grazed by sheep.

Protected species

- 2.16 A summary of findings in the EA in relation to protected species is provided below:
- 1 **Bats:** No trees or existing built structures on the site were identified to have potential to support roosting bats. The emergence surveys showed relatively low activity throughout the site, limited to pipistrelle (common and soprano). . A total of 10 bat species were identified from the results of automated detector surveys, although more than 95% of passes were common and soprano pipistrelle bats. The results indicate that the site and immediate offsite habitat do not form part of an important commuting route or foraging habitat for species other than pipistrelle. Any bats roosting either within the house or in offsite trees along the river corridor (neither of which are part of the development site) are likely to forage along the river corridor
 - 2 **Birds:** There is the potential for the hedgerow to support common and widespread species.
 - 3 **Reptiles:** The most suitable habitat for reptiles on the site is the dry bank along the eastern part of the site and, to a lesser extent, the steep bank where the existing track is present (and where the new access is proposed). The main central section of the field is less suitable. Low reptile numbers were recorded, with the majority of individuals recorded on the bank to the east and a single slow worm on the bank to the west of the track.

Trees

- 2.17 An Arboricultural Report (AR), prepared by ArbTS, accompanies this planning application.
- 2.18 The AR shows that the site is bounded to the north west by Ancient Semi Natural Woodland.
- 2.19 The tree survey assessed a total of 23 individual trees, five tree groups, one woodland area and two hedgerows at the site. The AR categorised these as follows:
- 1 Category A (High quality – Most desirable for retention): 2 trees, 1 tree group and 1 woodland area;
 - 2 Category B (Moderate – Desirable for retention): 3 trees; 1 tree group and 1 hedgerow;
 - 3 Category C (Low – Optional for retention): 12 trees; 3 tree groups and 1 hedgerow;
 - 4 Category U (Poor – Unsuitable for retention): 6 trees.
- 2.20 With the exception of the individual yew tree (T2), located in the front garden of the dwelling, at the south eastern boundary of the site, the AR identifies the two highest quality (Category A) trees and tree group at the western boundary of the site. The Category A woodland area (W1 – Ash, Hawthorn Hazel) is located at the north western boundary of the site and overlaps with the identified Ancient Semi Natural Woodland.
- 2.21 The Category B hedgerow (H1 – Silver Birch, Hazel, Hawthorn, Ash, Goat Willow) is located along the eastern boundary of the site, adjacent to the A470. This boundary also includes the Category B tree T3 (Elm). The Category B tree T8 (Wych Elm) is located to the west of the dwelling, on the western boundary. The remaining Category B tree (T1 – Crack Willow) is located near the centre of the site, to the south of the existing fence which separates the back garden and the field to the north.

Flood Risk and Surface Water Drainage

- 2.22 The Natural Resources Wales (NRW) Development Advice Map provides the current framework for assessing flood risk to and from new development. According to this Map, the site is located within Flood Zone A (considered to be at little or no risk of fluvial or coastal/tidal flooding).
- 2.23 NRW's Flood Map for Planning has no official status but represents "best available information on flood risk". This Map shows that the whole of the site is within Flood Zone 1 (less than 0.1% chance of flooding, including the effects of climate change) for Rivers and Seas and is also within Flood Zone 1 for Surface Water and Small Watercourses.
- 2.24 A Drainage Strategy Technical Note (DSTN), prepared by RPM Water, accompanies this planning application. The DSTN states that there are no foul or surface water sewers within the vicinity of the site.
- 2.25 The DSTN sets out the results of infiltration testing at the site and states that these results indicate that infiltration is a feasible option for surface water disposal for the scheme.

Transport and Access

- 2.26 A Transport Statement (TS), prepared by LvW Highways Ltd, accompanies this planning application.
- 2.27 The site is accessed from the A470 Trunk Road, which in this location is a single carriageway road that connects Merthyr Tydfil in the south to Brecon to the north.
- 2.28 The TS provides 2023 traffic count data from the Department for Transport Statistics website in relation to the nearest count points to the site, located on the A470 to the south of the junction with the A4054. The TS sets out that there are c.4 vehicles passing per minute in each direction at this location, equivalent to 1 vehicle every 15 seconds in either direction.
- 2.29 The TS sets out that there is sufficient space to accommodate two-way movements of vehicles at the access, based on swept path modelling. The TS considers that the existing visibility splays and stopping sight distances are fit for purpose and concludes that the existing access arrangements are safe and efficient.
- 2.30 A review of highway safety set out in the TS sets out that, based on personal injury collision data, there are no accident clusters or blackspots in the vicinity of the site. It concludes that the local highway network does not have an unduly poor safety record.

Heritage

- 2.31 A review of Cadw's website indicates that the nearest designated heritage assets to the site are:
- 1 Grade II listed Milestone on A470 near Wyrlod-ddu (ref. 81192), on the western side of the A470 just north of the junction with the A4054 (c.150m to the south of the site);
 - 2 Scheduled Monument at Cefn Cil-Sanws, Cairn on SW side of (ref. GM599) (c.500m to the north east);
 - 3 Scheduled Monument at Cefn Cil-Sanws Defended Enclosure (ref. GM600) (c.750m to the north east);
 - 4 Grade II Registered Historic Park and Garden at Cefn Coed Cemetery and Jewish Burial Ground (ref. PGW(Gm)70(MER)), located between the A4054 and River Taff, and including a section to the east of the A4054 (c.450m to the southeast);
 - 5 Scheduled Monument - Penmoelallt Round Barrows (ref. GM528) (c.1,250m to the west).
- 2.32 The site is not within an area for archaeological evaluation, as identified on the LDP Proposals Map.

Agricultural Land Classification

- 2.33 According to the Welsh Government's Agricultural Land Classification Predictive Map, the site includes land categorised as Grade 4 (Poor Quality) and Grade 5 (Very Poor Quality). The dwelling and garden would be classified as Non-agricultural land. Therefore, no part of the site is classified as Best and Most Versatile agricultural land (Grades 1-3a).

3.0 **Proposed Development**

- 3.1 The proposed development includes elements that relate to holiday accommodation use, some that are for purposes ancillary to the enjoyment of the dwellinghouse and others that are for purposes in connection with both the holiday accommodation and the enjoyment of the dwellinghouse. It also includes changing the use of the central area of the site, which is currently in agricultural use, to residential curtilage.
- 3.2 The proposed development comprises:
- 1 For holiday accommodation use:
 - a Erection of 5no. holiday accommodation pods, with associated decking;
 - b Erection of 1no. amenity pod for shower and toilet facilities, with associated decking;
 - c Siting of 1no. yurt;
 - d Installation of solar photovoltaic cells on roofs of 5no. holiday accommodation pods and 1no. amenity pod (19 PV panels, of 550W each);
 - e Associated access, car parking, hard and soft landscaping, and drainage
 - 2 For purposes ancillary to the enjoyment of the dwellinghouse:
 - a Erection of a timber canopy to be attached to existing outbuilding (labelled Stable);
 - b Erection of a polytunnel;
 - c Installation of swimming pool;
 - d Associated hard and soft landscaping; and
 - e Drainage infrastructure.
 - 3 For purposes mainly associated with the enjoyment of the dwellinghouse but with some use in connection with the holiday accommodation:
 - a Erection of 2no. studio workshops (within the residential curtilage);
 - b Installation of solar photovoltaic cells on roofs of 2no. studio workshops (10 PV panels, of 550W each).
 - 4 Change of use of parcel of agricultural land to residential curtilage.
- 3.3 The holiday pods will be installed using ground screws, meaning that they can be removed without damage to the site. However, it is intended that they will remain in situ. It is proposed that the holiday accommodation is available to guests throughout the year and would not be subject to a condition restricting occupancy by season.
- 3.4 The studio workshops will also be installed using ground screws.
- 3.5 When added together, the 29 proposed roof-mounted solar PV panels will provide a total of 0.016MW.

Disabled access

- 3.6 Regard has been given to the needs of disabled holidaymakers as part of the proposed design. The amenity pod and one of the holiday accommodation pods have been designed to be wheelchair accessible, with the provision of ramps rather than steps.

4.0 Pre-Application Advice

- 4.1 A request for pre-application advice was submitted to Bannau Brycheiniog National Park Authority (BBNPA) on 19 April 2023. A meeting between Lichfields and BBNPA took place on 30 May 2023 to discuss the proposals, and BBNPA provided written advice on 6 June 2023.
- 4.2 A summary of key points from the written pre-application advice is set out below:
- 1 **Principle of development:** In principle, subject to detailed considerations, the proposed development would accord with the development plan. The adopted Local Development Plan (LDP) includes support for sustainable tourism proposals which promote opportunities for the enjoyment and understanding of the National Park, whilst ensuring that the natural beauty, wildlife and cultural heritage is conserved and enhanced. The LDP enables appropriate low impact development schemes in countryside locations and clarifies that log pods (wooden tents) are typical examples of potential Low Impact Tourist Accommodation.
 - 2 **Landscape and Visual Impact:** The small scale and indicative design of the proposal, the magnitude of the effect (which is identified as minor at most – unlikely to be readily noticed by the observer) and the sensitivity of the site (within a National Park) will each be relevant in determining the significance of the visual impact of the proposal. This significance is considered to be “slight at most”. The views from recreational routes across the valley are considered in an appropriate and proportionate way in the pre-application submission.
 - 3 **Design and Landscaping:** The design of pods appear to be an appropriate and high quality response to the landscape setting and site context and reflect the SPG requirement to seek to reinforce traditional and local distinctiveness appropriate to the location. The proposed new planting as a means of reducing the magnitude of the affect on visual amenity is welcomed. The colour and shape/ design of the pods and accommodation will also be important, as will ensuring any lighting is kept to a minimum and at a low level.
 - 4 **Onsite facilities:** Justification should be provided as to whether any existing buildings offer scope for conversion for onsite facilities. Locating the amenity pod so as to minimise the length of service connections is welcomed.
 - 5 **Ecology:** No check on BIS records has been undertaken and no consultation has been undertaken with the National Park Planning Ecologist.
 - 6 **Heritage:** It is considered there will not be any impact on the setting of nationally or locally listed buildings or any conservation areas.
 - 7 **Equality Act:** Due regard must be given to any specific needs of likely building users that might be reasonably met.
- 4.3 In response to this pre-application advice, the applicants have changed the design of one of the holiday accommodation pods and the amenity pod to accommodate disabled guests.

5.0 **Planning Context**

Planning History

- 5.1 According to BBNPA's online planning database, and as set out in the pre-application advice, there is no planning history for the site itself.

Statutory Development Plan

- 5.2 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the determination of a planning application must be made in accordance with the development plan unless material considerations indicate otherwise.

Future Wales (The National Plan 2040)

- 5.3 Future Wales was published in February 2021 and forms part of the development plan. It is a development plan with a high-level strategy for addressing key national priorities through the planning system.

Brecon Beacons National Park Authority Local Development Plan

- 5.4 The Brecon Beacons National Park Authority Local Development Plan (LDP) was adopted in 2013.

- 5.5 The following policies are considered to be the key relevant policies for this application:

- 1 Policy 1 (Appropriate Development in the National Park Authority);
- 2 Policy SP1 (National Park Authority);
- 3 Policy SP3 (Environmental Protection);
- 4 Policy 1 (Appropriate Development in the National Park);
- 5 Policy CYD LP1 (Enabling Appropriate Development);
- 6 Policy SP9 (Renewable Energy);
- 7 Policy SP14 (Sustainable Tourism);
- 8 Policy 27 (House Extensions and Ancillary Buildings);
- 9 Policy 46 (Non-permanent Holiday Accommodation); and,
- 10 Policy 59 (Impacts of Traffic).

- 5.6 The following Supplementary Planning Guidance (SPG) are also key material considerations:

- 1 Policy 46 – Non-permanent Tourism Development Incorporating Low Impact Tourism Accommodation SPG (March 2015);
- 2 Landscape and Development SPG (June 2014);
- 3 Local Development Plan Policy SP9: Small Scale Renewable Energy Development (May 2015).

National Planning Policy and Guidance

Planning Policy Wales (Edition 12, February 2024)

5.7 Planning Policy Wales (PPW) is also a material consideration in the determination of this planning application. The following chapters and subsections are considered to be particularly relevant:

- 1 Chapter 2: People and Places: Achieving Well-being Through Placemaking;
- 2 Chapter 3: Strategic and Spatial Choices;
- 3 Chapter 4: Active and Social Places;
- 4 Chapter 5: Productive and Enterprising Places; and,
- 5 Chapter 6: Distinctive and Natural Places.

5.8 Building Better Places is a policy position published in July 2020 by the Welsh Government in response to the pandemic. The Welsh Government advises that this document sits alongside PPW as a key consideration in development management decisions. As such, it forms part of the material considerations for this planning application.

Technical Advice Notes

5.1 The following Technical Advice Notes (TANs) are relevant:

- 1 TAN 5: Nature Conservation and Planning (2009);
- 2 TAN 6: Planning for Sustainable Rural Communities (2010);
- 3 TAN 8: Planning for Renewable Energy (2005);
- 4 TAN 12: Design (2016);
- 5 TAN 13: Tourism (1997);
- 6 TAN 15: Development and Flood Risk (2004);
- 7 TAN 18: Transport (2007); and,
- 8 TAN 23: Economic Development (2014).

6.0 **Planning Policy Analysis**

- 6.1 Our assessment indicates that the proposed development will comply with national and local planning policy and aligns with the BBNPA Local Development Plan objective to support a sustainable tourism industry that contributes to public enjoyment of the National Park.
- 6.2 The key policy considerations are set out below:
- 1 Principle of development;
 - 2 Landscape and visual impact;
 - 3 Ecology and lighting;
 - 4 Trees;
 - 5 Foul and surface water drainage; and,
 - 6 Transport and access.

Principle of Development

- 6.3 Development in the National Park is required to comply with the statutory purposes set out in the Environment Act 1995 (as amended) to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park and to promote opportunities for public enjoyment and understanding of the special qualities of the National Park. The statutory duty is to foster the economic and social wellbeing of communities living in the National Park.
- 6.4 The proposed development will conserve and enhance the natural beauty of the National Park through the provision of a high quality, architect-designed scheme. It will support the understanding and enjoyment of the special qualities of the National Park in a way that does not harm these qualities by providing opportunities for people to stay and undertake craft workshops within a low impact holiday accommodation site located in this less-frequented area of the National Park.
- 6.5 The proposed development will also assist the economic and social well-being of the local community by enabling the site owners to diversify their business, which will result in economic benefits for local supply chains at both the construction and operational stages. The proposed development will also bring new visitor expenditure to businesses in the local area.
- 6.6 The proposed development will generate social, economic, cultural and environmental benefits, thereby reflecting the principle of sustainable development in national planning policy (PPW page 7).
- 6.7 The social benefits of the proposals include the provision of a high-quality holiday environment, supporting wellbeing for guests. Economic benefits include capital investment, support for a local business and supply chains and additional visitor expenditure in the local area. Cultural benefits include the opportunities for guests to participate in craft workshops and outdoor experiences, thereby contributing to the rich

cultural fabric of the National Park. Environmental benefits include improving wildlife habitats and increasing biodiversity at the site.

- 6.8 PPW recognises that there is a need to diversify the rural economy, ensuring that it is resilient to change and fit for the future (p.77). Chapter 5 of PPW considers tourism as an economic land use and one which is vital to economic prosperity and job creation in many parts of Wales (paragraphs 5.4.2 and 5.5.1).
- 6.9 In relation to local planning policy, the proposed development will comply with the following objective and key policies within the LDP:
- 1 **Objective SE5 Tourism:** The proposed development aligns with this LDP objective, which seeks to support a sustainable tourism industry that contributes to the public's enjoyment of the National Park.
 - 2 **SP1 National Park Policy:** As set out at paragraph 6.3 to 6.5 above, the scheme will support the statutory purposes and duty of National Parks, which is reflected at LDP Policy SP1.
 - 3 **Policy 1 Appropriate Development in the National Park:** In accordance with Policy 1, the small scale of the proposed development, together with its low impact design and use of natural materials will maintain the quality and character of the Park's natural beauty. The high quality landscape proposals, including the use of green roofs, together with the site's topography, will integrate the scheme into the landscape.

CYD LP1 Enabling Appropriate Development: The LDP Proposals Map identifies the site within Countryside (outside defined settlements) (Level 5). With cross-reference to LDP Policy 46, Non-permanent holiday accommodation, LDP spatial policy CYD LP1 enables appropriate Low Impact development schemes in countryside locations. A countryside location is considered to be necessary and essential for the scheme, which aims to attract guests to stay in an environment where they can feel close to nature and which serves as a base from which they can explore the National Park. In accordance with Policy CYD LP1, this high quality, architect-designed scheme will contribute positively to its countryside setting and will enhance the quality of the landscape.
 - 4 **SP14 Sustainable Tourism:** The scheme constitutes sustainable tourism development in accordance with Policy SP14, which will promote understanding and enjoyment of the National Park whilst conserving and enhancing natural beauty, wildlife and cultural heritage.
 - 5 **Policy 46 Non-permanent Holiday Accommodation:** The proposed holiday accommodation comprises 5no. holiday accommodation pods, 1no. yurt and 1no. amenity pod, which will be installed using ground screws, meaning that they can be removed without leaving a permanent trace.

In accordance with Policy 46, the scheme is designed to be fully integrated into the landscape. The accompanying Design Statement includes views of the site from public routes and vantage points. These views indicate that the scheme is integrated into the landscape through sensitive siting, the use of natural materials and the provision of landscape planting.

Onsite facilities: There are no suitable buildings onsite that are suitable for conversion for washroom facilities. The proposed amenity pod is located in proximity to the accommodation pods and yurt, in order to minimise the distance for guests, and to minimise drainage pipe runs.

- 6 **Policy SP9 Renewable Energy:** The proposed solar PV panels are to be mounted on the roofs of the proposed holiday accommodation pods and workshops. They are small scale and this technology is considered to be appropriate to the location. The proposed PV panels will be unobtrusive and well related to the built form of the scheme, and no impacts have been identified in relation to wildlife. It is therefore considered that they will not have a significant adverse impact on the natural beauty, wildlife, cultural heritage and special qualities of the National Park.

“Policy 46 - Non-permanent Tourism Development Incorporating Low Impact Tourism Accommodation” SPG

6.10 As noted in the pre-application advice, the scheme falls under the definition of Low Impact Tourist Accommodation (LITA) as set out in the “Policy 46 - Non-permanent Tourism Development Incorporating Low Impact Tourism Accommodation” SPG.

6.11 The scheme incorporates each of the features outlined in the SPG at paragraph 3.2, as summarised below and reflected in the accompanying Design Statement:

- 1 **Locally adapted, diverse and unique:** The design of the scheme reflects its local context, including the use of natural materials and green roofs;
- 2 **Based on renewable resources:** The proposed scheme utilises renewable resources, including rainwater harvesting for garden watering and solar PVs;
- 3 **Of an appropriate scale and design:** The scale is of small scale and appropriate design to this rural location;
- 4 **Visually unobtrusive:** The scheme will not be visible from most viewpoints but where it is seen, it is integrated into the landscape by way of its sympathetic design and layout, with access tracks provided in Cellweb rather than hardstanding;
- 5 **Enhances biodiversity and landscape:** The proposed scheme will enhance biodiversity and landscape through the provision of additional planting, including hedgerow, using native species, and by way of management of the grassland in the northern parcel of land;
- 6 **Increases public access to open space:** The provision of holiday accommodation will provide opportunities for guests to access open space in the surrounding landscape, including open access land on the opposite side of the A470;
- 7 **Generates little traffic:** As detailed in the accompanying Transport Statement, the small scale of the proposed scheme means that it will generate little traffic;
- 8 **Linked to sustainable livelihoods:** The proposed development will enable the site owners to diversify their craft and workshop business to support a sustainable livelihood in this rural location;
- 9 **Co-ordinated by a management plan:** Management details for the scheme are provided at Section 7 below.

- 6.12 The principle of development is therefore considered to be acceptable and is aligned with national and local policy, and guidance. This conclusion aligns with the pre-application advice received from BBNPA.

Landscape and Visual Impact

- 6.13 LDP Policy 46 (Non-permanent Holiday Accommodation) part a requires that non-permanent holiday accommodation is fully integrated into the landscape *“by virtue of topography or surrounding land uses, particularly when viewed from public routes and vantage points outside of the site.”*
- 6.14 The accompanying Design Statement demonstrates that the proposed scheme has been designed to integrate fully into the landscape by following the topography of the site, through high quality design and utilising natural materials and green roofs, and through landscape planting. As such, the scheme has been designed to respond to its site context and landscape setting.
- 6.15 Landscape planting will be undertaken to include new hedgerow and will utilise native species, as set out in the Green Infrastructure Statement, included in the Design Statement.
- 6.16 The Design Statement includes photographs providing key viewpoints of the site from public routes and vantage points. The pre-application advice states that these views are considered in an appropriate and proportionate way in the supporting statement submitted with the request for pre-application advice – which now forms part of the Design Statement.
- 6.17 These photographs show that close views of the site from most locations are blocked or obstructed by topography and intervening vegetation. Distant views of the site from the public footpaths to the west are seen in the context of existing features, including woodland, fields, small farms and the A470. The design of the scheme is considered to integrate with this existing landscape character.
- 6.18 The landscape and visual impact of the scheme is therefore considered to be in accordance with the development plan and reflects the guidance in the SPG for LDP Policy 46.

Ecology and Biodiversity

- 6.19 The accompanying Ecology Assessment (EA) considers that, with the exception of the Cwm Taf Fawr SINC, all of the designated sites are sufficiently removed from the proposed development so as to be unaffected by the proposals. Any potential impacts to the Cwm Taf Fawr SINC would be restricted to construction impacts only, primarily from minor soil movements required to create the new vehicular access.
- 6.20 The EA recognises that there is unlikely to be significant surface water run off from the proposed development, taking into account its small scale and the proposed drainage strategy.
- 6.21 The EA considers that the habitat loss arising from the scheme will be offset through appropriate management of the retained habitat. This retained habitat will also comprise a significant part of the reptile mitigation. It is anticipated that, whilst this cannot feasibly be returned to meadow grassland on account of the reptiles, appropriate management will

increase opportunities for a variety of species. The EA considers that the Cellweb permeable access will provide connectivity across the site and will result in a variety of sward heights. It states that connectivity to habitats offsite will also be maintained and improved through enhancement of the grassland to the west of the pods, which connects directly to the grassy bank/access track to the west. It sets out that creation of the vehicle access track would result in more significant habitat loss but this is unlikely to more than what could be offset by bringing the remainder of the habitat into a more favourable condition.

- 6.22 The EA states that there will be an increase in light spill resulting from occupation of the units, particularly those to the west of the site, as well as from vehicles accessing the new access road. External lighting through low level bollards on a sensor will minimise spill. A new hedgerow will prevent light spills from car headlights on the eastern side of the valley.
- 6.23 A summary of key recommendations in the EA is provided below:
- 1 **Bats:** New units not to be positioned in close proximity to the western boundary. External lighting to be kept to a minimum and designed to avoid illumination offsite [no external lighting is proposed]. New hedgerow to be planted along the western edge of the track to prevent light spill from entering the main valley basin. Bat boxes to be provided.
 - 2 **Birds:** Removal of trees to be undertaken outside of the nesting season (March to August, inclusive); 5no. bird boxes to be provided.
 - 3 **Reptiles:** A detailed Working Method Statement to be provided by condition, to ensure that reptiles are protected throughout construction works. A summary of anticipated measures provided in the EA. Reptile habitat is to be retained as indicated at Plan 2 in the enclosed EA.
 - 4 **Hedgerow and tree planting:** Small sections of new hedgerow planting to be included around the perimeter, to be protected with suitable fencing while they establish. A new hedgerow to be planted to the west of the access track. New hedgerows to be of locally native species of local provenance.
 - 5 **Habitat:** We would welcome a condition requiring agreement of a Habitat Management Plan detailing the species composition and management of habitat. The grassland to be largely left unmanaged with only an annual cut in autumn (to be cut to a height no lower than 15cm). Short sward to be maintained across the access routes where the Cellweb is to be laid. Native species to be used and this grassland mix to be recreated as far as is practical for the roof in terms of hydration and substrate.
 - 6 **Hedgehog:** A single artificial hedgehog refuge to incorporated into any new hedgerow (not the roadside boundary).
 - 7 **Invertebrates:** An insect nesting box to be provided, either in the new units or on trees.
- 6.24 Each of the recommendations above is being taken forward.
- 6.25 The EA concludes that the proposed development, with the inclusion of the above mitigation and enhancements, will meet local and national policy requirements, including a biodiversity net gain. It states that the extent of habitat loss will be more than compensated for by bringing the remainder of the grassland into favourable condition, as well as

providing artificial nesting opportunities, leading to an overall enhancement and contributing towards priority habitat and species outcomes.

- 6.26 It is therefore considered that the proposed development is in accordance with national and local planning policy in relation to ecology and biodiversity.

Trees

- 6.27 The accompanying Arboricultural Report (AR), which includes a Tree Survey, sets out that four trees will be removed to facilitate the construction of the proposed development. One of these trees is identified as moderate quality (Category B) and three are of low quality (Category C):
- 1 Tree T1: Crack Willow (Category B) – toward the centre of the site, south of the existing fence running east to west;
 - 2 Tree T4: Goat Willow (Category C) – to the north east of the dwelling, adjacent to the eastern boundary;
 - 3 Tree T10: Oak (Category C) – to the south west of the site, at the western boundary;
 - 4 Tree T9: Cherry (Category C) – to the north west of the dwelling.
- 6.28 The AR states that this tree loss should not present a constraint on developing the site, and the loss can be mitigated by suitable compensatory planting. Replacement trees will be provided, using native species.
- 6.29 A Tree Protection Plan is provided within the AR, which sets out recommendations for protection of the remaining trees, including methods to protect roots and soil structure during construction.
- 6.30 The proposed development is therefore in accordance with the requirements of LDP Policy 8 (Trees and Development), which sets out that trees and their root systems are retained and adequately protected, and/or, where the NPA agrees to the removal of trees, appropriate replacement must be provided onsite utilising native trees of local provenance.

Foul and Surface Water Drainage

- 6.31 The accompanying Drainage Strategy Technical Note (DSTN), including a Drainage Plan, provides details of the proposed approach to foul drainage and surface water drainage, which is informed by percolation tests.
- 6.32 Each pod is designed to be fitted with a wash basin. The amenity pod will include 2no. WCs, 2no. wash basins and 1no. shower.
- 6.33 All grey water is to drain into an underground sewage treatment tank just north of the proposed new hedgerow, prior to discharging into a soakaway at the south west corner of the glamping area. A composting toilet system is proposed, with preference given to a “WooWoo” type system with a urine and leachate separator. This will drain to a separate stone filled soakaway to the south of the amenity pod.
- 6.34 The use of non mains sewerage is considered to be appropriate, as the DSTN states that there are no foul or surface water sewers within the vicinity of the site, and that ground conditions are appropriate for infiltration.

- 6.35 The proposals include provision for sustainable surface water drainage. As detailed in the DSTN, rainwater runoff from the pods will be collected by an integrated system, including green roofs and a piped drainage system, which will discharge into the soakaway at the south west corner of the glamping area.
- 6.36 The proposed development is therefore considered to be in accordance with LDP Policy 57 (Use of Non Mains Sewerage Solutions) and Policy 58 (Sustainable Drainage Systems).

Transport and Access

- 6.37 The proposed development will utilise the existing access onto the site. The accompanying Transport Statement (TS) sets out that the existing access provides an appropriate means of access to the site and that the proposed development will not result in highway safety issues.
- 6.38 The TS discusses the change in the number and type of vehicle movements arising from the proposed developments. It's anticipated that there will be a similar number of movements and a removal of some slow-moving agricultural vehicle movements.
- 6.39 The proposed development is considered to be in accordance with LDP Policy 46 ((Non-permanent Holiday Accommodation) criteria d and with Policy 59 (Impacts of Traffic).

7.0 Conclusion

- 7.1 This Planning Statement has considered the proposed development against national and local planning policy and guidance.
- 7.2 The principle of development for this proposal is considered to be acceptable. In accordance with national policy and guidance, the proposed development will promote diversified and sustainable growth in the tourism industry. It will generate social, economic, cultural and environmental benefits, thereby constituting sustainable development.
- 7.3 The proposed development represents a high quality scheme that will contribute positively to its countryside setting by conserving and enhancing the quality of the landscape and the natural beauty of the National Park. It will support the understanding and enjoyment of the special qualities of the National Park in a way that does not harm these qualities by providing opportunities for people to stay and undertake craft workshops within a low impact holiday accommodation site located in this less-frequented area of the National Park.
- 7.4 The proposed development will assist the economic and social well-being of the local community by enabling the site owners to diversify their business, which will result in economic benefits for local supply chains at both the construction and operational stages. The scheme will also bring new visitor expenditure to businesses in the local area.
- 7.5 The proposed scheme includes non-permanent holiday accommodation which accords with Policy 46 (Non-permanent Holiday Accommodation), which is fully integrated into the landscape.
- 7.6 The scheme will provide a net benefit for biodiversity, through the provision of additional planting and hedgerows. The proposed development complies with the requirements of sustainable drainage policy.
- 7.7 There are no concerns raised in relation to the transport impacts of the scheme.
- 7.8 Based on our analysis and the evidence provided in the accompanying technical documents, it is concluded that the proposal is acceptable in relation to all key planning policy matters, complies with the development plan when considered as a whole and as such, we consider that planning permission should be granted.

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