**Design and Access Statement**

*(DAS as WG June 2017)*

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**Full Planning Application**

**Proposed Holiday Park Development**

Cwmhafren Field, Aelybryn,

Aberhafesp, Newtown,

Powys, SY16 3HR

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For Mr Jack Woosnam

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October 2020

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**1 Application Details**

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1. 01 **Client and Applicant**

Mr Jack Woosnam, Aelybryn, Aberhafesp, Newtown, Powys SY16 3HR

Tel 07545 632744 email [woosnam.jack@googlemail.com](mailto:woosnam.jack@googlemail.com) website - cwmhafren.com

1. 02 **Development Description**

Proposed Holiday Park Development (incl. change of use) comprising 35 holiday units in total. Proposed vehicular access from highway (B4568). Installation of foul drainage treatment plant to serve development.

Site area involved is approx. 4.59h submitted as 2 no applications to be read in conjunction and to run concurrently.

Application 1 *all matters except for amenity area*

Application *2 Change of use of central amenity area as change of use only from agricultural use to amenity area in conjunction with development.*

1. 03 **Site Location**

Agricultural land known as *‘Cwmhafren Field’* as part of Aelybryn farm holding located north of the B45686

6 kilometres west of Newtown and 1.5 kilometres north-east of Caersws.

Grid Ref SO 0450 9337

1. 04 **Site Description**

The site itself can be described as secluded with the prevailing site contours allowing the holiday units to be sited relatively inconspicuously in the landscape, particularly as the site field is ringed by mature and emerging broadleaved woodland. A more detailed survey is included within the Preliminary Ecological Assessment (PEA) and Visual Impact Assessment (VIA) attached to this application.

*See Section 2 Introduction of Proposal*

1. 05 **Pre-application Enquiry**

The LPA Pre-application Enquiry ref. 20/002/PRE was received on the 06.03.2020. (An initial site layout proposal had been prepared to enable the Case Planning Officer to consider and review the relevant policies and issues relating to such a development proposal.)

The Enquiry Report is attached as attached pdf Appendix 1

Having considered all matters the Case Officer *concludes ‘Having carefully considered the proposed development, the principle of development is considered to comply with the relevant planning*

*(policies). I would ask that careful consideration is given to all of the points raised including the comments from consultees prior to the submission of any formal planning application.’*

In view of the positive nature of the LPA response, the applicant was resolved to make the necessary investment in Specialist Reports, drawings and research etc to satisfy the specific requirements confirmed in the Enquiry Report and facilitate the submission of the formal Pre-Application Planning Consultation as required by planning procedure for proposals classed as *‘major developments’.*

**2 Introduction of proposal**

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2. 01 The applicant is 36 years old married with 3 children and following general WG guidelines, has decided to invest in a farm diversification project as the farm holding is relatively modest at 70 acres. He also runs a small business *‘outdoor solutions’* comprising general garden maintenance, fencing, tree planting etc. In view of the required maintenance of Holiday Parks, this proposal represents a logical extension to the maintenance business whilst offering the opportunity to provide a viable income stream in the future.

2. 02 PCC LDP Policy E6 (4.4.18) states:

*‘Farm diversification offers key benefits for the socio-economic growth of rural communities allowing the creation of commercial opportunities to provide rural employment that utilises existing resources; and helps maintain the viability of individual farm units or enabling the family unit to remain within the community and to have viable employment.’*

This policy together with similar WG Policies contained within PPW- 10 2018 and Technical Advice Note (TAN) 6 July 2010 *‘Planning for sustainable rural communities’.* Further supports the need for appropriate diversification within the rural sector particularly in upland Wales.

2. 03 Holiday developments in Mid Wales have undoubtedly become a significant economic ‘driver’ and is a significant contributor to the local economy.

This can be seen by various reports regarding the tourism sector and holiday parks in particular. A new well-conceived and developed holiday park would have significant benefits to the local and national economy. A recent tourism report published in Feb 2019 found that UK holiday parks generates some £9.3bn in visitor expenditure equating to £5.3bn GVA to the UK economy. The holiday park sector supports 171,448 FTE jobs in the UK with visitors who stayed in caravans/chalets/lodges spending an average £557 per visit (£101) per day.

WG have published the Wales Tourism Performance Report 2019 which indicates that the seasonal May-October average for occupancy of caravan holiday homes was at 90% an increase of 2% from 2018. These statistics and reports can be extrapolated according to the individual sector, although high-quality parks represent perhaps the best investment in the future as visitors demand higher standards and amenities. The planning imperative is set out in national and local planning policy and guidance.

2. 04 PCC LDP Policy TD1 – Tourism Development.

This policy defines the scope of tourist accommodation and *‘confirms that new tourist development is encouraged due to its contribution to the economy in terms of visitor spending supporting local businesses and employment generation’.*

As outlined in Section 3 –‘Access and Movement’, a material caveat of PCC LDP E6 is that the proposal must be in compliance and not at odds with transport policies and that the capacity of the highway in terms of additional traffic generation and the safety of road users. We are confident the proposed access to the highway is compliant and fulfils the criteria set out in LDP Policy T1 i.e*. ‘a safe and efficient flow of traffic for all transport users including more vulnerable users and especially those making ‘active travel’ journeys by walking or cycling’.*

A more detailed consideration of TD1 is included in Section 8

Planning policy context.

**3 Access and Movement**

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3. 01 The vehicular access (entry and egress) will be constructed to the standards as set out in DMRB and in compliance with PCC LDP Policies DM13 and T1.

The location and access point enjoys the benefit of a relatively straight section of highway B4568 which enables the necessary forward visibility of 2.4m x 215m in both directions within the applicants land ownership. The access apron and centreline is offset to ensure adequate separation between the existing access to Llwynybrain to the south and Aelybryn to the east to minimise traffic conflicts at these points. The visibility splays are indicated on the Block Plan and the details of hedge removal and re-instatement are set out in the PEA Report Appendix 3 *‘Method statement for hedgerow relocation’.*

3. 02 The B4568 links with the A470 (Cardiff-Glan Conwy T) and the A483 to Shrewsbury and the national motorway network via M54. This network enables visitors to access this visitors from major conurbations within reasonable journey durations and onward to the myriad scenic landscapes, coastal resorts and holiday attractions. The location of the site at roughly mid-point of the A470 (north-south) make visits to the north and south of wales (e.g. Snowdonia or Brecon beacons) are equally accessible within 1-1.5 hrs car journey.

3. 03 The ‘Wales Way’ routes - The ‘Coastal Way’, The ‘Cambrian Way’, and the ‘North Wales Way’, are easily accessed from this central wales location and represents WG strategy as it encourages visitors to stop and support tourism attractions and facilities along the routes. (See thewalesway.com)

3. 04 For visitors who prefer to use the train service, nearby Caersws and Newtown both have stopping stations on the Cambrian Coast railway. There are virtually hourly services from Shrewsbury –Aberystwyth and further up the Cambrian coast as far as Pwllheli on the Llyn peninsular. This railway is very scenic and quite spectacular and is very popular with tourists, students and commuters alike.

3. 05 Although there are no public footpaths/rights of way through the site itself, a short walk south to neighbouring farm, Llwyn y brain overlooking the River Severn, has a footpath travelling west to Caersws (severn-way) which then links to the rights of way local network where walkers can enjoy the wonderful mid-wales scenery, Roman remains and the excellent facilities available in Caersws village itself. The area is criss-crossed with public footpaths and rights of way ideal for outdoor visitors

3. 06 Caersws also links to the Sustrans National Cycle network from where cyclists can select a number of challenging routes to suit their abilities. *(The Caersws to Machynlleth via Llanidloes and Staylittle is particularly popular route for tourists.)*

3. 07 The internal road layout within the site is purposely ‘organic’ in character to engender a sense of community within the 2 developed areas and maintain a rural ‘feel’. The consolidated gravel surface finishes will allow for natural percolation and avoid the ‘semi-suburban’ character of over-engineered solutions. The sharp corners and presence of traffic calming measures will ensure a max. speed limit of 10mph within the site. There are additional turning areas and passing places. There will be a minimum of 2 parking places per. holiday unit.

The road layout utilises the natural contours of the site with gentle rises and falls from the access apron. The first 20m of road from the highway junction will be macadam to the HA standard specification. This will ensure the safety of manoeuvres at the access point and ensure that gravel is not carried onto the surface of the highway. The apron SWD via gullies will be soaked away within the site perimeter.

3. 08 Disabled access

The holiday park will welcome all visitors which obviously includes those with disabilities. Those holiday units which have been adapted for disabled access and use, will be sited to ensure ramps are provided with hard paving to access their vehicles. The amenity building serving the site will be single storey with disabled access and facilities. Ambulant and semi-ambulant visitors will be given any additional assistance they may need. Subtle and low-level illumination will be provided for those disable users.

The principle of inclusive access will be adopted and maintained at all times to ensure visitors enjoy their stay and become regular guests and visitors irrespective of any disablement considerations.

**4 Character and Appearance**

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4. 01 The site plan illustrates the siting of 20 holiday caravans to the western side set within mature trees and planted areas as part of a long-term WG ‘*Glastir’* scheme. A further 15 holiday cabins are sited to the eastern boundary on the edge and within existing mature deciduous woodland with the stream meandering at the bottom of the sloping banks. These features in themselves represent intrinsic visual amenity and perfect screening requirement.

4. 02 The applicant has selected 2 types of holiday unit from the Willerby range of holiday homes.

The chalets will be a selection of ‘Pinehurst’ and ‘Clearwater’ range. The dimensions are 13165mm long x 6620wide x 4030 height to roof apex. These are 2 bedroom units. They are clad in Canexel Pre-finished timber effect in 21 colours*. \*Colours to be confirmed with the LPA* Windows and doors uPVC grey.See attached pdf Appendix 2

The caravan units selected are ‘sheraton’ and ‘winchester’ range. The dimensions are 13402mmlong x 4260wide x 3424 height to apex. Windows and Doors uPVC grey*.\*Colours to be confirmed with LPA* See attached pdf Appendix 3

These are high-quality contemporary type units with twin pitched roofs, fully winterised with a selection of interior types.

4. 03 The central ‘paddock’ remains open and forms part of the amenity area together with a children’s play area and a bespoke amenity/activity building serving the site. A small area may be fenced to accommodate fowl/grazing stock to allow visitors, particularly children interaction with farm animals and demonstration of husbandry e.g shearing sheep. Obviously normal public health considerations will inform the extent of interactions. (This area is the subject of Application 2 the ‘change of use’ only)

4. 04 The secluded character of the site, itsl maturity of the established treescape, stream and other natural features make it an interesting location for visitors and largely inconspicuous in the landscape. The status of the landscape has been appraised by our 2 consultants who have prepared the Visual Impact Assessment and Preliminary Ecology Assessment. These are detailed assessments, self-evident in content and I think underlines the status of the site as being well suited to its proposed holiday use. I would note that the habitat in ecological terms is considered *‘relatively low ecological value’ and ‘there are no statutorily designated sites within 2km of the development site’.*

4. 05 In view of the foregoing and the content of the assessment reports, in terms of LDP TD1 we believe the site satisfies the criteria of TD1 (2)+(3) as follows:

**Although in the open countryside it is compatible in terms of location, siting, design, scale and naturally integrated into the landscape to such an extent it will not detract from the overall character and appearance of the locality. It also represents an appropriate farm diversification scheme within the policy definition and guidelines.**

**5 Environmental Sustainability**

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5. 01 The proposal is environmentally sustainable because it falls within adopted national and local planning policy in a Tourist Regeneration Area with minimal intervention into the landscape.

5. 02 Within the site area a recycling/refuse area will be run and managed by the applicant in connection with the Local Authority. All organic waste will be site composted.

5. 03 Obsolete units will be removed and disposed of by licensed reclamation contractor operating a sustainable recycling/disposal regime.

5. 04 Flood Risk

The NRW DAM map identifies the main area to be within Zone A. A small area next to the watercourse appears to be in Zone B although slightly unclear due to the scale of the map. These areas are classified as being at the lowest risk of flooding which shows compliance with PCC LDP DM5 and PPW 2018

5. 05 Foul Sewage

In view of the distance from the site to the pumping station at Aberhafesp, some 2.9km to the east, mains drainage is not a realistic proposition in this case. Therefore, an on-site treatment plant is, we have been advised, the only realistic treatment methodology. We have instructed our Chartered Drainage Engineer to design a foul drainage system and treatment plant accordingly. The Calc. data and design by Sumner Consulting Ltd is attached to the application bundle.

The treated effluent will be drained to the watercourse and will not be a pollution risk due to the management and monitoring plan in connection with the operation of the unit.

5. 06 Electricity and Water

Mains electricity and mains water are available adjoining the site and will require min. engineering to effect connections.

5. 07 Light pollution must be guarded against to preserve the Powys ‘dark sky’ and particularly important in the open countryside.

See PCC LDP DM7. A considered lighting scheme will be prepared when the electrical Installation is designed and approved by the LPA prior to installation.

**6 Community Safety**

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6. 01 Although this is a holiday development and not a residential development, Community safety remains an important consideration. The Holiday Park will be owner-operated from the neighbouring farmhouse, Aelybryn. This arrangement will ensure proactive management and supervision at all times. Natural surveillance from neighbours within the ‘Park will also be encouraged to deter opportunist theft, whilst the separate site layout may engender a community ‘feel’.

6. 02 The required H&S file will be compiled and the LPA requirement for data of visitor names and numbers etc will be a valuable resource in management and safety of visitors. The site is quite open so there are no particular risks involved except the very shallow stream and the access to the highway. The observer will note a considerable distance exists from the highway to the holiday units.

6. 03 As mentioned earlier, very low-key illumination at ground level will be incorporated in a later scheme to be approved by the LPA.

6. 04 The storage and use of LPG will be strictly operated and monitored by the applicant. NACO (National Ass.of caravan owners) have specific guidelines and advice for members. The provisions contained within the Caravan Site Licence also refer to site safety.

6. 05 The access into and around the site ensures emergency services can be accommodated quickly and easily.

**7 Pre-Planning Consultation Report**

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7. 01 Preamble

A formal Pre-Planning Consultation has been undertaken in accordance with DMPWO Order 2012/2016 and the Planning Applications (Temporary Modification and Disapplication Wales Coronavirus Order 2020. Amendment came into force 19th May 2020.

7. 02 In line with the Order, a website was utilised for the Consultation process –cwmhafren.com with the available documents posted and Consultees informed.

7. 03 A site notice was posted at the entrance to the site dated

7. 04 A response was received from Natural Resources Wales dated 23.07.2020

Requirement 1 – Foul drainage

It is NRW and PCC policy to connect to mains where possible. As stated earlier, in this case we are unable to do so in view of the 2.5km distance from the site to the pumping station. Although a pumped rising main is situated in the highway next to the site, I am informed by our Drainage Engineer that it the statutory undertaker, Severn-Trent Ltd would not allow any connection into this rising main.

We have therefore submitted an alternative foul drainage treatment plant and infrastructure as part of this application.

See Sumner Consulting Ltd- Drainage proposal.

Condition1 – Bats

*Details of siting and type of external lighting will be submitted.*

*Construction Works will take place in daylight only*

*There will not be any light spillage to stream corridor, woodland nor hedgerows*

Protected species

NRW have confirmed they accept the submitted PEA and its conclusion and their additional observations will be noted.

7. 05 CPAT/CADW

An exchange of email correspondence has taken place with Mr Mark Walters of CPAT. The response dated 18.08.20 requested we consider 2 issues in relation to the application.

It was confirmed that due to the presence of Gwynfyndd enclosure (SM MG064) 1km to the north-west, a setting impact assessment may be required by CADW. I can confirm I have contacted Mr Neil Maylan of CADW who has confirmed subject to the inclusion of para 6.1.23 PPW Edition 10 *‘Archaelogical Remains’,* CADW have no further interest at this stage due to the separation distance involved. I confirm as follow:

Archaeological Remains 6.1.23

The planning system recognises the need to conserve archaeological remains. The conservation of archaeological remains and their settings is a material consideration in determining planning applications, whether those remains are a scheduled monument or not.

7. 06 The second issue related to the request that we undertake a geophysical survey of the whole site area as part of a pre-determination stage. There is in fact no record of any archaeological remains on the site as it is 1 km away from the scheduled monument.

In view of the costs involved which would be ‘in-effect’ a fishing exercise at the applicant’s expense, we decided not to commission such a survey at this time. We would be content to accept a ‘watching brief’ Condition and would be happy to co-operate with CPAT accordingly. It is Mr Walter’s view that such a survey is required to determine the sub-soil potential of this quite large development site within the ‘historic landscape’ –*my inverted commas.*

Our view is that it is simply another field in Montgomeryshire and cannot be considered ‘historic’ otherwise the corollary of this premise is that any development proposal on a field in Montgomeryshire will require a geophys survey as a matter of course, which we consider an unreasonable proposition.

7. 07 PCC Strategic Policy SP7 refers to historic assets and resources and the need to protect those identified assets. This is not the case as all landscape and historic assets are listed within the VIA report, none of which involve or impact upon this application.

7. 08 We received an enquiry from a neighbouring landowner in relation to the consultation process, who requested a copy of the drainage report that was not available at that time. I confirm that this has been sent and no further contacts have been received.

**8 Planning Policy Context**

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8. 01I will brieflyreview and comment on the relevant Planning Policies from PCC LDP Adopted April 2018 in relation to our application and guidance given in the Pre-Planning Enquiry dated 06.03.2020

8. 02 I have reviewed the national guidance PPW 10 2018 and the TAN specialist guidance numbers 5/6/11/12/13/18/23 the principles of which are largely incorporated into PCC LDP in the context of this application.

8. 03 **SP7 Safeguarding strategic assets and resources.**

I have addressed this policy and conclude that in our view we do not threaten any historic asset as none have been identified and by implication, will have no adverse effect on resource nor operation.

**DM1 Planning Obligations**

There is adequate infrastructure available either on site or adjoining site

There are no identifiable adverse impacts to be mitigated

Benefit for the local community will be secured by means of tourist spend and creation of secure employment.

**DM2 the Natural Environment**

The natural environment has been exhaustively assessed through the Preliminary Impact Assessment and the Visual Impact Assessment. Therefore habitats and species identified and protected. The development should have minimal impact on the site or its environs. All matters listed in the policy have been addressed in the Reports referred to.

The benefits of the development have been previously confirmed in Enquiry Report and in view of the low ecological value of the site can be seen to outweigh other considerations.

**DM4 Landscape**

On balance we consider our application to be appropriate development under Policy E6, in terms of siting scale and design.

A visual Impact assessment has been attached (as required) by an independent consultant who concurs with this view.

**DM5/6 Flood risk**

There is no perceived flood risk to this site nor detrimental impact on neighbouring land.

**DM7 Dark skies and external lighting.**

We understand the sensitivity of the site and have addressed it in preceding sections and have given an obligation which we expect to be included as a Planning Condition.

**DM 10 Contaminated/unstable land.**

The land is established pasture and there is no history nor evidence of contamination nor unstable ground.

The minimal level of engineering work involved in the site development will have no material effect on the site geology and characteristics.

**DM 13 Design and Resources**

This is a large category of requirements so I will comment on those I consider relevant.

Hopefully we have demonstrated good quality design and conceptual thinking.

The development will have little impact on existing (and proposed) tourist developments as it is a modest proposal that should bring only positive outcomes for existing attractions.

It is inclusive with full provision for people with disabilities

The access and movement section of this DAS sets out all transport considerations and the increase in traffic movements should have minimal impacts due to the existing advantageous road geometry.

Existing infrastructure exists adjoining the site resulting in no unacceptable adverse effect on the surrounding community nor environment.

**E6 Farm Diversification**

This application falls squarely within the strategic thinking of national and local policy with regard to promoting sustainable rural communities by way of creating new dynamic businesses by farm diversification. The tourist interest and demand in Mid Wales is increasing and if the siting is appropriate and access is safe and compliant then the policy states that development proposals for farm diversification will be permitted.

**TD1 Tourism Development**

This should be considered in tandem with farm diversification as it is the driver of tourism in Mid-wales that facilitates holiday developments such as this.

The policy encourages new tourist development and proposals will be permitted where:

*2. In the open countryside, where compatible in terms of location, siting, design and scale and well integrated into the landscape so that it would not detract from the overall character and appearance of the area and in particular where:*

*i. It is part of a farm diversification scheme;*

*iv. It is not permanent in its nature.*

*3. Accommodation shall not be used for permanent residential accommodation.*

It is our contention that this development proposal is fully compliant with this policy

**SPG’s Biodiversity and Landscape**

These Special Planning Guidance supplements provide more detailed information to accompany the actual planning policies *per se.* They have been considered and referred to in our Consultants reports for PEA and VIA

**9 Summary and Conclusion**

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9. 01 The site is ideal for purpose, secluded and extremely well-screened with mature tree-scape and additional emerging broadleaved planted woodland already some 3.6m high.

9. 02 The site requires little physical intervention in terms of modelling or re-grading, which ensures its natural contours allow the chalets to nestle into the landscape and thereby giving ‘Cwmhafren Holiday Park’ a unique identity particularly in terms of promotion and advertising so important to the success of the venture.

9. 03 These selected holiday units are pleasantly-proportioned single storey with have sloping roofs, are good quality and affordable. The range of finishes and colours allow some beneficial creative imput.

9. 04 Due to its relatively isolated location it will not impact neighbouring properties or communities and does not disrupt the viewing points as shown in the VIA.

9. 05 The landscape although very pretty has little ecological value and the addition of ecological enhancement listed in the PEA result in the proposal having virtually no impact on existing ecology.

9. 06 Access from the highway is compliant with policy and thereby deemed to be safe and should not have any material effect on the highway network.

9. 07 The proposal is sustainable and accessible by all modes of transport.

9. 08 In view of the foregoing, I cannot see any adverse impacts that may be prejudicial to the merits of this application.

9. 09 As can be seen from the review of planning policy, both national and local, the application complies with the key strategic, DC and SPG guidance and can develop into yet another asset in the tourist infrastructure of the area

9. 10 Finally therefore, to conclude may I commend this application to the LPA as we have sought to justify our objectives, provide the required information as per the initial positive support contained within the Pre-Planning Enquiry Report on which this application has been brought forward.

C. Wozencraft BA(Hons) BA(Hons) Arch

Wozencraft Design Services

Agent to Mr J Woosnam, Applicant

October 2020