



# Planning Application Supporting Statement

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Change of use of land for the siting of a holiday lodge at Upper Penarran, Kerry, Newtown, Powys SY16 4PW

February 2022



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**PROJECT**

Change of use of land for the siting of a holiday lodge

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## 1. Introduction

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### Purpose of this Statement

- 1.1 This document provides supporting information in respect of a planning application by Mr J George for the change of use of land to enable the siting of a holiday lodge at Upper Penarran, Kerry, Newtown SY16 4PW.
- 1.2 It is intended to provide a concise overview and explanation of the background to the proposal, and in particular:
  - The policy context within which the application should be considered and determined;
  - An assessment of the planning merits of the application; and
  - Consideration of site-specific planning issues.
- 1.3 The information contained in this document is supplementary to that provided on the completed planning application forms and is to be regarded as forming part of the application. The information contained in this statement is also intended to assist the Planning Authority in determination of the proposals.
- 1.4 This statement should be read in conjunction with the plans and drawings submitted which demonstrate the potential of the site and its relationship to the surrounding built form and landscape.

### Background to the Development

- 1.5 The proposed development represents the diversification of the existing agricultural (beef and sheep) business at Upper Penarran Farm. Diversified income streams are essential for farming businesses to add resilience. This is particularly important during the post Brexit and pandemic period. Diversification schemes also provide an opportunity for farm businesses to optimise their assets and unlock entrepreneurial skills within the family.
- 1.6 The application site lies close to the site of a recent planning application (reference P/2017/0729) for another diversification proposal at the farm, a 32,000 bird poultry unit. However, that application was refused due to its potential impacts upon highway safety. The applicant therefore wishes to pursue an alternative diversification project that will not give rise to the same highway impacts.

- 1.7 A Pre-Planning Application Enquiry (PPAE) was therefore submitted to inform the preparation of this planning application. In summary, the PPAE response received from the Council (reference 20/0148/PRE) concluded that the principle of development would be considered acceptable and the proposed design and siting of the lodge is also likely to be considered satisfactory. Nonetheless, the pre-app identified that further consideration be given to:
- the potential landscape impact of the proposed development (addressed elsewhere in this statement); and
  - how the development relates to the proposed poultry unit (no longer an issue following the refusal of planning application P/2017/0729).

## 2. The Site and Proposed Development

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### The Site and its Environs

- 2.1 This section explains the nature of the area within which the proposed lodge will be sited. It also sets the context for determining whether the proposed site is suitable for the development.
- 2.2 The location plan submitted with the application identifies the application site. In addition the site location, on land to the south of Upper Penarran farmstead, is identified on the aerial imagery at Figure 1, below.



**Fig. 1:** Extract of Google Maps Aerial Imagery with site location identified

- 2.3 The site for the holiday lodge has been identified as it lies in close proximity to the farmstead and can therefore benefit from the services in place at the farmstead, including water and electricity, whilst being located sufficient

distant from the farm to ensure that no unacceptable amenity issues arise from the farm's operation.

- 2.4 In addition, and significantly, the proposed site of the holiday lodge will not impede the operation of the farm and is well screened by existing hedgerows, mature vegetation, the farmstead's existing buildings and the topography of surrounding land.

### **The Proposed Development**

- 2.5 The application is for a holiday lodge which will meet the definition of a caravan (as per the Caravan Act 1968) fitting comfortably within the specified dimensions of a caravan/mobile home. An illustration of the type of caravan envisaged is provided below (figure 2).
- 2.6 The holiday lodge is currently anticipated to be a 'Melrose' lodge from Norwegian Log Buildings Limited, as illustrated on page 26 of the brochure that accompanies this pre-application enquiry submission. This lodge comprises of 1 bedroom, a bathroom and a kitchen/dining/living space.
- 2.7 Given the scale of the proposal and its location (in close proximity to, and served by, the existing farmstead's highway access), no highway access and parking implications arising as a result of the proposed development. The transport implications of the proposed development are considered further elsewhere in this statement and in the accompanying Highways Technical Note (BERRYS, ref. SA41798\_TN1 (24.01.2022)).

## 3. Tourism in Wales, Mid Wales and Powys

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### Introduction

- 3.1 The proposal involves the diversification of an existing agricultural business into tourism in Powys, with the provision of a holiday lodge, enhancing the agricultural business's viability and also helping to support the local economy through custom for local services and tourist attractions in the local area and beyond.
- 3.2 The proposed development will provide small scale, but high quality, tourist accommodation in Powys. There is a significant evidence base that supports the provision of visitor accommodation within Wales and in Mid-Wales and Powys in particular. This chapter sets out a brief summary of tourism in Wales, Mid-Wales and Powys.

### The Economic Impact of Tourism

- 3.3 The importance of the tourism industry to the Welsh economy is identified in the Welsh Government's "Welcome to Wales: Priorities for the visitor economy 2020-2025", which sets out the Welsh Government's aspirations for the tourism industry in Wales and recognises that tourism not only contributes to the whole of the Welsh economy but also makes a positive contribution to all aspects of Welsh life: creating prosperity, confidence, employment, cultural regeneration, environmental appreciation, health benefits and fun. The document details that the tourism industry in Wales is in a strong position, having welcomed record numbers of UK visitors in the five years to 2020, and that the business community reports that performance is positive and expresses confidence about the future. The document further details that more than 9% of the workforce in Wales is now employed in tourism and therefore that tourism is one of the country's fastest growing sectors and benefits many rural areas as the main driver of the economy and source of employment.
- 3.4 A Mid Wales Tourism Strategy was produced by The Tourism Company in June 2011. Whilst this Strategy is now dated, it does provide a pre-pandemic overview of the tourism industry in Mid Wales. The introduction to the strategy details that:
- Tourism is inordinately important to the region, contributing to local prosperity and quality of life across Mid Wales
  - Tourism supports a significant number of jobs and injects much needed revenue into the economy.



- Gwynedd, Ceredigion and Powys are rank 2nd, 4th and 5th amongst the 22 counties in Wales in terms of Tourism Economic Intensity which relates Tourism GVA to overall GVA.
- GVA of tourism in the Mid Wales Unitary Authorities (2007):
  - Ceredigion: £93m, 10% of the county's total GVA, supporting 4,100 FTEs.
  - Powys: £122.2m, 7.6% of the county's total GVA, supporting 5,400 FTEs.
  - Gwynedd: £206.7m, 11.6% of the county's total GVA, supporting 9,100 FTEs.
- Tourism also supports the development of vital infrastructure and other economic activities.

The strategy then identifies that Mid Wales “needs to pursue tourism because, first, this is where its natural comparative advantage lies and, second, there are few alternative sectors given the uncertainties surrounding public sector employment and agriculture, the other mainstays of the regional economy. In addition, tourism:

- Supports cross-cutting services and infrastructure which benefit local people and can result in greater variety of cultural and leisure provision e.g. transport links, the range of shops and services, restaurants and bars, local heritage and cultural facilities; and
- Helps promote a positive image to the outside world which, in turn, can attract investment and make people feel better about the place in which they live.

## 4. Planning Policy Framework

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### National Planning Policy

4.1 Planning Policy Wales Edition 11 was adopted in February 2021 and is the key national land use planning policy document for Wales. Planning Policy Wales (PPW) sets out the Welsh Government's land use planning policies with the aim to translate the Government's commitment to sustainable development within the planning system. This is highlighted in the Introduction at paragraph 1.2, which details that the "primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales", this should be considered during plan-making and decision-taking.

4.2 PPW provides a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise (paragraph 1.18). In this regard, it details that Local Planning Authorities should ensure that the social, economic, environmental and cultural benefits of a proposed development are considered in the decision-making process, recognising that, in doing so, there may be occasions when one benefit of a development proposal outweighs others. Key factors in the Local Planning Authority's assessment process include:

- *Economic Considerations*

Economic considerations include job creation, regeneration, growth of important economic sectors and rural diversification. PPW specifically identifies in paragraph 5.5.1 that "Tourism involves a wide range of activities, facilities and types of development and is vital to economic prosperity and job creation in many parts of Wales. Tourism can be a catalyst for regeneration, improvement of the built environment and environmental protection". The importance of tourism to the economy of rural areas such as Powys is highlighted in paragraph 5.5.3, which identifies that tourism related development "is an essential element in providing for a healthy and diverse economy".

- *Social Considerations*

Social considerations include access to employment opportunities and how proposals support the development of more equal and more cohesive communities. With regard to tourism development, PPW specifically states (in paragraph 5.5.2) that "The planning system encourages tourism where it contributes to economic development, conservation, rural diversification,

urban regeneration and social inclusion, while recognising the needs of visitors and those of local communities”.

- *Cultural Considerations*

Cultural considerations can include how far the proposal supports the provision of jobs and economic activity and how the area’s distinctive offer, including the Welsh language and landscape, is promoted.

- *Environmental Considerations*

Environmental considerations include how important features of the natural and built environment are protected and enhanced, how environmental risks are prevented or appropriately managed and how efficient and most appropriate use of materials is made.

## Local Planning Policy

4.3 The currently adopted Development Plan for the Powys Local Planning Authority area is the Powys Local Development Plan (LDP). This document provides the local context in which planning applications should be assessed and determined. A number of objectives and policies contained within the LDP have been identified as being of particular relevance to the development proposal, as follows:

### OBJECTIVE 7 – KEY ECONOMIC SECTORS

This objective recognises that tourism is a key economic sector of the Powys economy and provides support for the provision of development that maintains and strengthens sustainable year-round tourism opportunities.

### DM4 – LANDSCAPE

Policy DM4 seeks to ensure that development is appropriate in terms of its siting, scale and design on the characteristics and qualities of the landscape. Development therefore needs to have regard to LANDMAP, Registered Historic Landscapes, adjacent protected landscapes and the visual amenity enjoyed by users of Powys landscapes and adjoining areas.

### DM6 – FLOOD PREVENTION MEASURES AND LAND DRAINAGE

Identifies that development proposals must avoid unnecessary flood risk and provide satisfactory provision for land drainage, including the consideration of Sustainable Drainage Systems.

### DM13 – DESIGN AND RESOURCES

Policy DM13 is a key policy in the Local Development Plan and provides general development control criteria against which all development

proposals are assessed. Criteria within the policy of relevance to this development proposal include that development must:

- Be designed to complement and/or enhance the character or the surrounding area in terms of siting, appearance, integration, scale, height, massing, and design detailing;
- Be inclusive to all, making provision for people with disabilities; and
- Meet all highway access requirements, vehicular parking standards and demonstrate that the strategic and local highway network can absorb the traffic impacts of the development.

#### TD1 – TOURISM DEVELOPMENT

As detailed within paragraph 4.8.5 of the LDP, this policy encourages new tourist development because of the contribution it makes to the economy. Nonetheless, in open countryside the policy restricts such development to that which is “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 ... it is part of a farm diversification scheme” (emphasis added). The supporting text to the policy also highlights that proposals which support an existing tourist facility, attraction or asset and are sympathetic to the natural environment and rural landscape will be supported.

## 5. Planning Assessment

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5.1 The main planning issues concern the following:

- Principle of Development
- Sustainable Development
- Highways
- Landscape Impact
- Flood Risk and Drainage

### Principle of Development

5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to determine planning applications in accordance with the development plan unless there are material circumstances which 'indicate otherwise'. The Development Plan in Powys consists of the adopted Local Development Plan (LDP).

5.3 The application site lies outside of any development boundary defined within the Powys LDP and is therefore considered to be open countryside.

5.4 Nonetheless, the LDP (in key objective 7) recognises the significant economic benefits, such as visitor spend, employment and support for local businesses (as detailed elsewhere in this statement) that arise as a result of tourism development and therefore the important role that the tourism industry plays in the economy of Powys. Policy TD1 therefore enables the provision of tourism accommodation in the County, including in the open countryside where tourism accommodation is limited to that which is compatible in terms of location, siting, design and scale and well-integrated into the landscape, so that it does not detract from the overall character and appearance of the area. Particular support is provided for schemes that are part of a farm diversification scheme and/or complement an existing tourism asset.

5.5 The tourism accommodation development subject of this application is a small scale proposal that, whilst sited within the open countryside, is located on, and will diversify, an existing rural enterprise. The proposed holiday lodge would also be located in close proximity to, and would therefore support, the Kerry Ridgeway - a pre-historic highway ideal for walkers, horse riders and mountain bikers. The principle of the proposed development is therefore supported by LDP objective 7 and policy TD1.

5.6 Consideration of how the proposal complies with detailed policy considerations including landscape and highways impact is provided

elsewhere in this statement. However, in summary, no unacceptable adverse impacts on interests of acknowledged importance (including the character and appearance of the area and highway infrastructure) have been identified as arising from the proposed development. The principle of the proposed development is therefore considered to accord with the aims, objectives and policies of the LDP which recognise the importance of tourism development to the Powys economy.

## Sustainable Development

5.7 Paragraph 1.17 of PPW states that the planning system provides for a presumption in favour of sustainable development.

5.8 There are four different dimensions to “sustainable” development: economic, social, environmental and cultural well-being and it is considered that this development will contribute to all four dimensions of sustainable development, as set out below:

- *Economic role of the proposed development*

Tourism is a key economic sector of the Powys economy and the proposal represents a sustainable growth opportunity for the sector in the local area. The proposal will also enable the diversification of an existing agricultural business into tourism through the provision of a holiday lodge, enhancing the agricultural business’s viability and also helping to support the local economy through custom for local services and tourist attractions in the local area and beyond. The proposed development therefore helps diversify the economic base of the local area, ensuring a broader financial base and economic resilience.

Local economic benefits anticipated to arise from the proposed development include additional jobs in both the construction phase and the operation of the scheme and increased custom for local services and facilities (including existing services and businesses such as shops, restaurants and public houses in Kerry, for the benefit of both tourists and the local community alike.

It is evident, therefore, that the economic benefits of farm diversification into tourism, should be given significant weight in the determination of any subsequent planning application.

Further information on the economic benefits of tourism development is contained within section 3 of this statement

- *Social role of the proposed development*

Tourism development, particularly when it represents the diversification of an existing rural business, can play an important role in ensuring the

sustainability of local communities. As previously detailed, they act as key catalysts for the local economy, providing and supporting community services and facilities, whilst also offering people from outside the area an opportunity to stay and enjoy an area of high quality countryside.

- *Cultural role of the proposed development*

The Welsh Government's "Welcome to Wales: Priorities for the visitor economy 2020-2025" document identifies (on page 39) that "Tourism, culture and language are closely interlinked. The tourism sector provides the accommodation, facilities and infrastructure that enable our young people to work in their communities, and our guests to learn about, access and enjoy Welsh culture and language".

It is considered that the proposed development will result in significant cultural benefits by enabling people to visit, and immerse themselves in, the local area. The culture of the area will therefore result in significant benefits, including enhanced job opportunities, economic activity and the enjoyment and recognition of the area's language, history, landscape and other cultural experiences.

- *Environmental role of the proposed development*

The development proposal utilises a site that is currently a small area of improved grassland currently used for grazing livestock and is therefore of limited ecological value. The proposal may therefore enhance the natural environment as it will include additional landscape planting and biodiversity measures such as bird and bat boxes to enhance the value of the site.

The landscape impact implications of the proposed development are considered further in a following section of this statement. Nonetheless, the surrounding topography, vegetation and existing buildings minimise the proposed development's visual and landscape impact.

No unacceptable adverse environmental impacts have therefore been identified as arising from the proposed development.

- 5.9 Given the economic, social, cultural and environmental implications of the development, as detailed above, it is contended that the proposal constitutes sustainable development and is supported by national planning policy. PPW's "presumption in favour of sustainable development" is therefore engaged.

## Highways

- 5.10 A transport assessment of the proposed development has been carried out (Technical Note: Highway Statement for the Proposed Holiday Lodge at Upper Penarran, Kerry (SA41798\_TN1) – BERRYS, 24-01-2022). This assessment, submitted in support of the application, considers transport issues including

road safety, traffic data, transport and sustainability, parking and development traffic. In summary, it concludes that the development is not anticipated to give rise to any road safety or capacity issues on the nearby network. It is therefore concluded that the proposed development would be acceptable in terms of highway and transport matters and therefore accords with the relevant provisions in LDP policy DM13.

## Landscape Impact

- 5.11 Local planning policy DM4 seeks to ensure that new development does not give rise to any unacceptable adverse landscape impacts. Regard has therefore been had to the Supplementary Planning Guidance (SPG) – Landscape which details the considerations and processes to undertake to identify the potential landscape impact of a proposed development.
- 5.12 Page 20 of the SPG details that, outside a settlement, tourism development of less than 1,000sqm floor area, or where the site area is less than one hectare, is less likely to have a significant landscape impact) and the planning application should be supported by a planning statement that includes detail of how the development proposal has been sited and designed to be integrated into the landscape and an informal landscape assessment that demonstrates compliance with Policy DM4, using the baseline assessment (site analysis plus LANDMAP).
- 5.13 The proposal subject of this application is 41.6sqm floor area on a site of 0.1043 hectares. It is evident, therefore, that the development is of a scale that would not give rise to any significant landscape impact. Nonetheless, this planning statement provides information on how the development proposal has been sited and designed to be integrated into the landscape and provides an informal landscape assessment to demonstrate compliance with policy DM4 proportionate to the scale of the development proposed.
- 5.14 A baseline assessment of the site has been undertaken with information identified in section 2 of this statement and on the SWOT Analysis drawing (in accordance with paragraph 6.12 of the SPG). In summary, the site has been identified as it is well screened by existing vegetation and topography and relates well to the existing farmstead whilst not impeding the operation of the farm.
- 5.15 Public views into the site from the south and east are from the public highway where views of the proposed lodge will be screened by existing vegetation (including roadside and field boundary hedgerows) and the topography of the land which falls significantly from the road to the

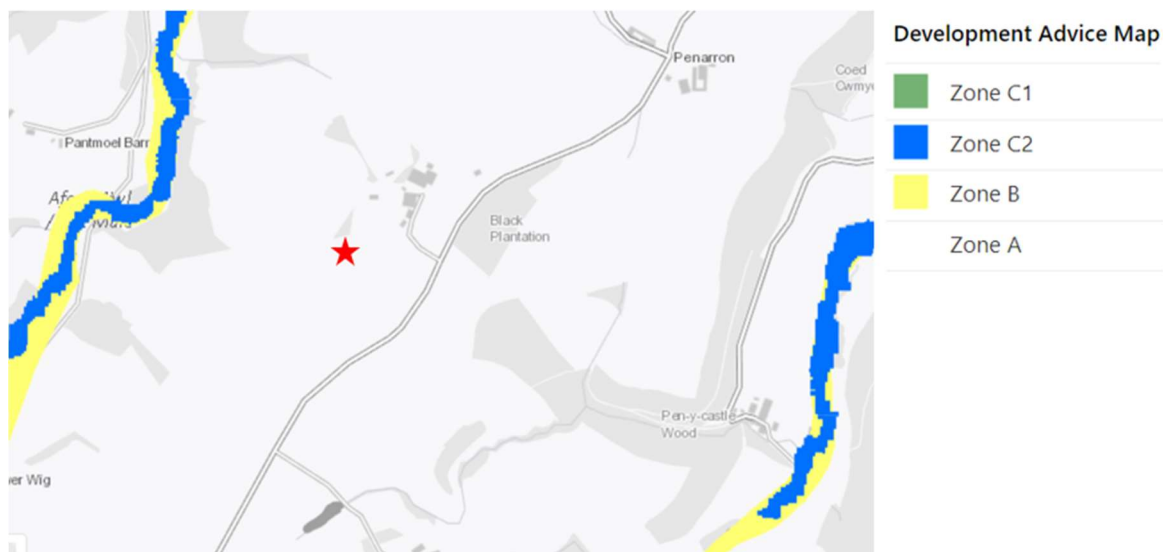


application site. In any longer distance views from the south and east the lodge, if visible, will be seen against the backdrop of the adjoining woodland to the north and the farmstead and will therefore appear as an insignificant element of the existing farmstead.

- 5.16 There are no significant public views into the site from the north and west due to the adjoining woodland and landform. Any glimpses of the lodge will be in longer distance views where again the lodge will appear as an insignificant element of the existing farmstead.
- 5.17 In addition, and significantly, the site lies close to the application site of a recent poultry building (application reference P/2017/0729). Whilst that application was refused, it was not refused on landscape impact grounds. The delegated officer report for that application details that the site lies within an area where the LANDMAP landscape visual and sensory evaluation is high value. LANDMAP describes the area as an open and broad expanse of upland grazing with dominant open skies and wind exposure. Occasional attractive views available over the Church Stoke farmland and rolling lowland farmland to the north and dramatic upland grazing views to the south. Tranquil/spiritual setting derived from the historical drove route along the ridgeway, Offas Dyke path and the infrequent passage of traffic. Two separate single turbines on hillsides are visible in the area close to the large windfarm to west (Llandinam). Nonetheless, the proposed poultry unit was not considered to give rise to any unacceptable adverse landscape impact due, in part, to existing site boundaries comprise of established hedgerows and mature trees. The current proposal for a holiday lodge is significantly smaller in scale than the previously proposed poultry building and is on a site that is better screened by existing vegetation and topography being in a less elevated position and closer to the adjoining woodland. It is evident, therefore, that the proposed lodge development will similarly not give rise to any unacceptable adverse landscape impact.
- 5.18 In light of the above consideration and subject to suitable conditions, it is not considered that the proposed development will have an unacceptable adverse impact on the Powys landscape and is therefore compliant with policy DM4 of the Powys LDP.

### **Flood Risk and Drainage**

- 5.19 The application site lies within an area that is not at risk from flooding, as identified on the extract of the Natural Resources Wales (NRW) Development Advice Map for Planning provided at figure 2, below.



**Fig. 2:** Extract of NRW's Development Advice Map, with site location identified

- 5.20 The foul drainage will be directed to a new sewage treatment plant and soakaway. Impervious surfaces will be kept to a minimum and any surface water drainage will also be directed to soakaway. These methods of drainage are considered to be the most sustainable options available for the application site.
- 5.21 Given the above, no unacceptable adverse drainage and flooding impacts will arise as a result of the proposed development.

## 6. Conclusion

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- 6.1 This statement has been prepared in support of a planning application for the provision of a holiday lodge at Upper Penarran, Kerry.
- 6.2 The holiday lodge will diversify the economic base of an existing agricultural (beef and sheep) enterprise and will enable holiday makers to visit, enjoy, and therefore support an existing tourism attraction / asset (the Kerry Ridgeway).
- 6.3 The proposal is considered to accord with national and local planning policy frameworks. Whilst no unacceptable adverse impacts on the environment, local amenities, or other interests of acknowledged importance have been identified as arising from the proposed development.
- 6.4 The development is therefore considered to be appropriate in context, resulting in minimal impact whilst making a positive contribution to the local community and economy of the area. It also makes a positive contribution to the tourism industry within Powys, an economic sector that is “inordinately important to the region, contributing to local prosperity and quality of life across Mid Wales” (Mid Wales Tourism Strategy, The Tourism Company, June 2011).
- 6.5 The proposal also directly accords with the four different dimensions to sustainable development: economic, social, environmental and cultural wellbeing. The proposed development should therefore be considered in the context of the presumption in favour of sustainable development provided in Planning Policy Wales.