



August 2023

Planning Application for a Rural Enterprise Worker's Dwelling

Planning Statement

at
68 Degrees West Glamping,
Cradoc,
Brecon,
Powys,
LD3 9LP

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1 Introduction

- 1.1 Miss Rachel Witcomb and Mr Lewis Gould of 68 Degrees West Glamping (the Applicants) have instructed Reading Agricultural Consultants Ltd (RAC) to submit a planning application for a rural enterprise worker's dwelling at 68 Degrees West Glamping, Cradoc, Brecon.
- 1.2 This statement is written by Ieuan Williams, who is an Associate of RAC, a member of British Institute of Agricultural Consultants and a Practitioner of the Institute of Environmental Management and Assessment. He was co-author, with other RAC Associates, of the TAN 6 Practice Guidance, commissioned by the Welsh Government Planning Division.
- 1.3 This appraisal considers the justification for an on-site manager's dwelling and provides comments on the background to the current proposal and considers the development in the light of relevant Development Plan Policies and National Planning Guidance.

2 Background

- 2.1 The tourism enterprise, 68 Degrees West Glamping was first established in the 1980s by Miss Witcomb's grandmother. It started as a camping and Caravan Club site and has developed since then after it was taken over by Rachel Witcomb and her partner Lewis Gould in 2015, who have significantly expanded the offering at the site.
- 2.2 The site is located adjacent to Cradoc Golf Course and is some 540m north-east of the settlement of Cradoc. The site is some 1.5 miles north-west of Brecon, albeit 2.5 miles by road.

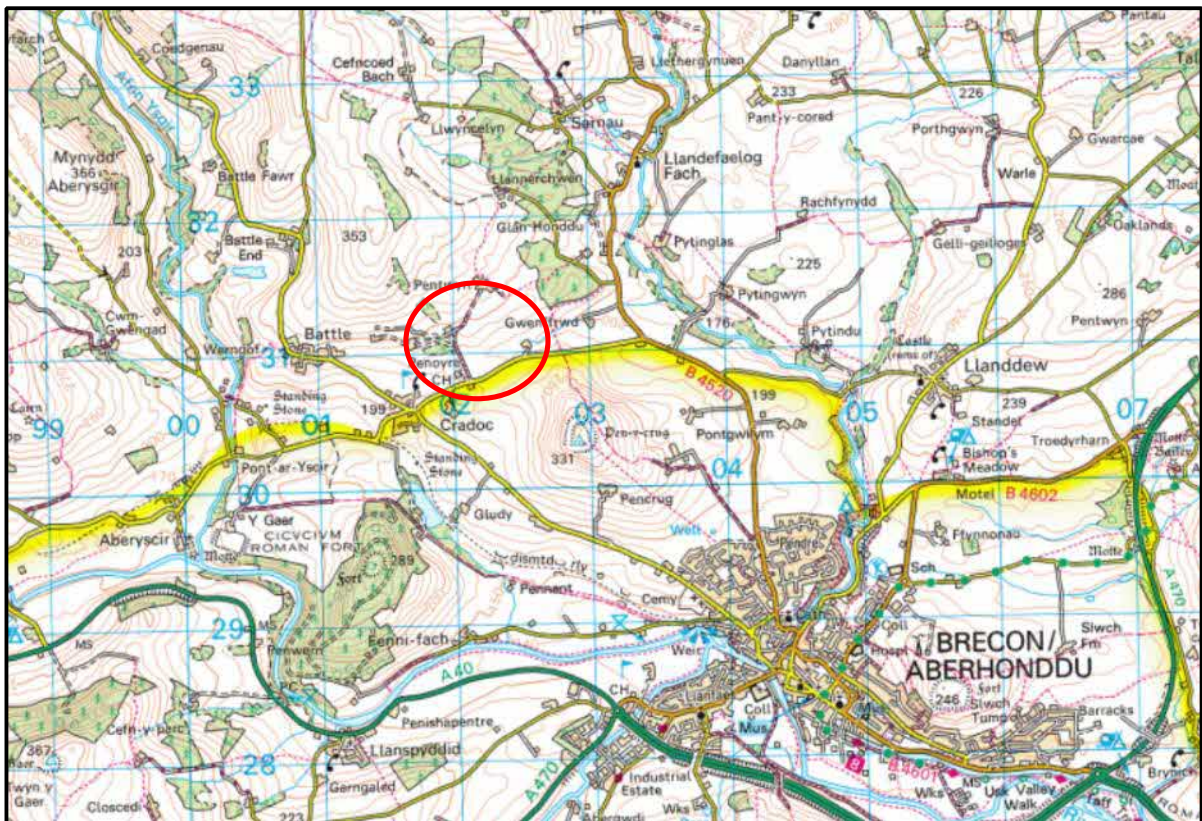


Figure 1. 68 Degrees West is situated adjacent to Cradoc Golf Course

- 2.3 A planning application in 2017 (2017/0584) formalised the tourism offering comprising a caravan site including 10 caravan pitches, 10 tent pitches, 20 log pods and a toilet /shower block.
- 2.4 The site currently offers seven permanent glamping pod units in various formats:
 - The Lodge – double bedroom with kitchen, bathroom, central heating and hot tub;
 - Black Mountain – sleeps 4 with kitchen, bathroom, central heating and hot tub;
 - Pen y Fan – sleeps 2 with kitchen, bathroom, central heating and hot tub;
 - Y Cwtch – sleeps 2 with kitchen and hot tub;
 - Y Glyd - sleeps 2 with kitchen and hot tub;

Celyn - sleeps 2 with kitchen and hot tub; and

Ty Bach – sleeps 2 with hot tub.



Figure 2. The 68 Degrees West glamping and touring caravan site

- 2.5 A subsequent planning application in 2019 (19/1590/OUT) gained approval for a utility building which included a laundry room, machinery store, small office, games room and toilets. Initially, the application included a manager's dwelling but this proposal was withdrawn after Powys CC informed the Applicants that it would be refused because the business, in its existing format, had not been established for three years. A Reserved Matters application (ref. 22/2196/RES) has since been granted, securing, and establishing the 2019 outline application and utility building.
- 2.6 The site originally extended to 0.6ha (1.5 acres) but the Applicants' land ownership has now increased to 2.6ha (6.5 acres) following purchase of some surrounding land.
- 2.7 Since the Applicants have taken over the site it has become very popular, particularly since the pandemic when tourists seized the opportunity to gain access to the hills and open countryside. This has not abated now that the country has returned to some form of normality, whereby people are more interested in taking short breaks throughout the year. This is helped by the site's position in close proximity to Brecon and the Beacons. Hill walking and mountain biking take place throughout the year, with poor weather perceived as a challenge to be overcome rather than a deterrent.
- 2.8 The site is recognised by the Welsh Tourist Board as offering exceptional service and has prestigious accreditations and awards, including:

Visit Wales Quality assured glamping accreditation;

Visit Wales Glamping Gold accreditation for 3 pods with facilities 2019-2023;
Visit Wales Caravan Site approved listed status 2019-2023;
2019 runner-up in the Wales Tourism start up award; and
being categorised as a 'super host' with AirBnb.



Figure 3. The land ownership at 68 Degrees West and location of proposed manager's dwelling.

- 2.9 The site has also developed a symbiotic relationship with Cradoc Golf Course, whereby guests receive a discount off the first round of golf they play.
- 2.10 The approved 2019 application was predicated on a pre-app response from Powys CC (19/0057/PRE). The utility building was considered to complement “an existing tourist asset, without causing any harm to the enjoyment of that asset. In fact, the provision of a utility block would be for the benefit of the existing tourist accommodation on offer at 68 Degrees West Glamping. In light of the above, it is considered that the principle of development for a utility block is acceptable at this location.”
- 2.11 It was acknowledged that the proposal for a manager's dwelling on the site would be categorised as a rural enterprise dwelling. However, since the business in its current format at the time had only been in existence since 2019, then a permanent dwelling would have been premature. On this basis, the Applicants were persuaded to withdraw the application for a

permanent dwelling. Nevertheless, the pre-app comments noted that “it is considered that the principle of development for a managers rural enterprise dwelling at this location is fundamentally acceptable.”

3 Proposal

- 3.1 The application seeks permission to construct a three-bedroom family dwelling and separate garage/storage area at 68 Degrees West for Lewis and Rachel. They currently live in a short-term rental at the adjoining Pentwyn Farm, having relocated from Garthbrenny, 3 miles from the site, as it was proving unsustainable given the number of emergency incidents and call-outs involving guests which occurred out-of-hours throughout the year. The Applicants have been asked to vacate the rented accommodation as it is required for a farmworker, and this has prompted this application.
- 3.2 Clearly, prompt attendance to guests is essential to resolving issues. Tourist accommodation and booking is invariably undertaken on-line and is predicated on reviews by past guests – one poor review in on-line forums can result in potential guests avoiding the venue and revenue/profitability falling.
- 3.3 The manager’s dwelling would be in close proximity to the holiday accommodation units and would enable a rapid response to any issues arising and accessibility for guests with any queries.



Figure 4. Some of the locally made pods with hot tubs at 68 Degrees West

4 Planning Policy

National Planning Policy

- 4.1 National planning policy guidance on rural development is set out in Planning Policy Wales (PPW) Edition 11. Paragraph 5.6.8 states:

“Planning authorities should adopt a constructive approach towards agricultural development proposals, especially those which are designed to meet the needs of changing farming practices or are necessary to achieve compliance with new environmental, hygiene or welfare legislation.”

- 4.2 Additional guidance is set out in TAN 6, whose objective is to promote a:

“sustainable and profitable future for farming.... while safeguarding the environment, animal health and welfare....”

- 4.3 The Welsh national guidelines (July 2010) in TAN 6 indicate in paragraph 4.4.1 that permission may be granted for new dwellings on well-established agricultural units for essential workers who need to live on the unit, where it can be demonstrated that:

- a) there is a clearly established existing functional need;
- b) the need relates to a full-time worker, and does not relate to a part-time requirement;
- c) the enterprise concerned has been established for at least three years, profitable for at least one of them and both the enterprise and the business need for the job, is currently financially sound, and has a clear prospect of remaining so;
- d) the functional need could not be fulfilled by another dwelling or by converting an existing suitable building already on the land holding comprising the enterprise, or any other existing accommodation in the locality which is suitable and available for occupation by the worker concerned; and
- e) other normal planning requirements, for example siting and access, are satisfied.

Local Planning Policy

- 4.4 Local planning policy can be found within the Powys Local Development Plan (2011-2026) which was adopted on the 17th of April 2018. Strategic Policy SP6 - Distribution of Growth across the Settlement Hierarchy considers housing and employment distribution across the local authority

area. Category 5 considers the 'Open Countryside including the Undeveloped Coast' and states, inter alia:

“To protect the open countryside including the undeveloped coast of Powys, the majority of growth is directed into sustainable settlements as defined above. Outside of settlements, strict control will be exercised over new development proposals.

Development proposals will need to comply with relevant national policy including PPW and TANs including:

TAN6: Planning for Sustainable Rural Communities....

Housing:

Only housing development that complies with the national exceptions policies as set out in PPW and TAN 6 will be permitted in the Open Countryside....”

- 4.5 There are no specific policies relating to rural enterprise workers' dwellings, although, as observed, reference is made to TAN 6 policies.

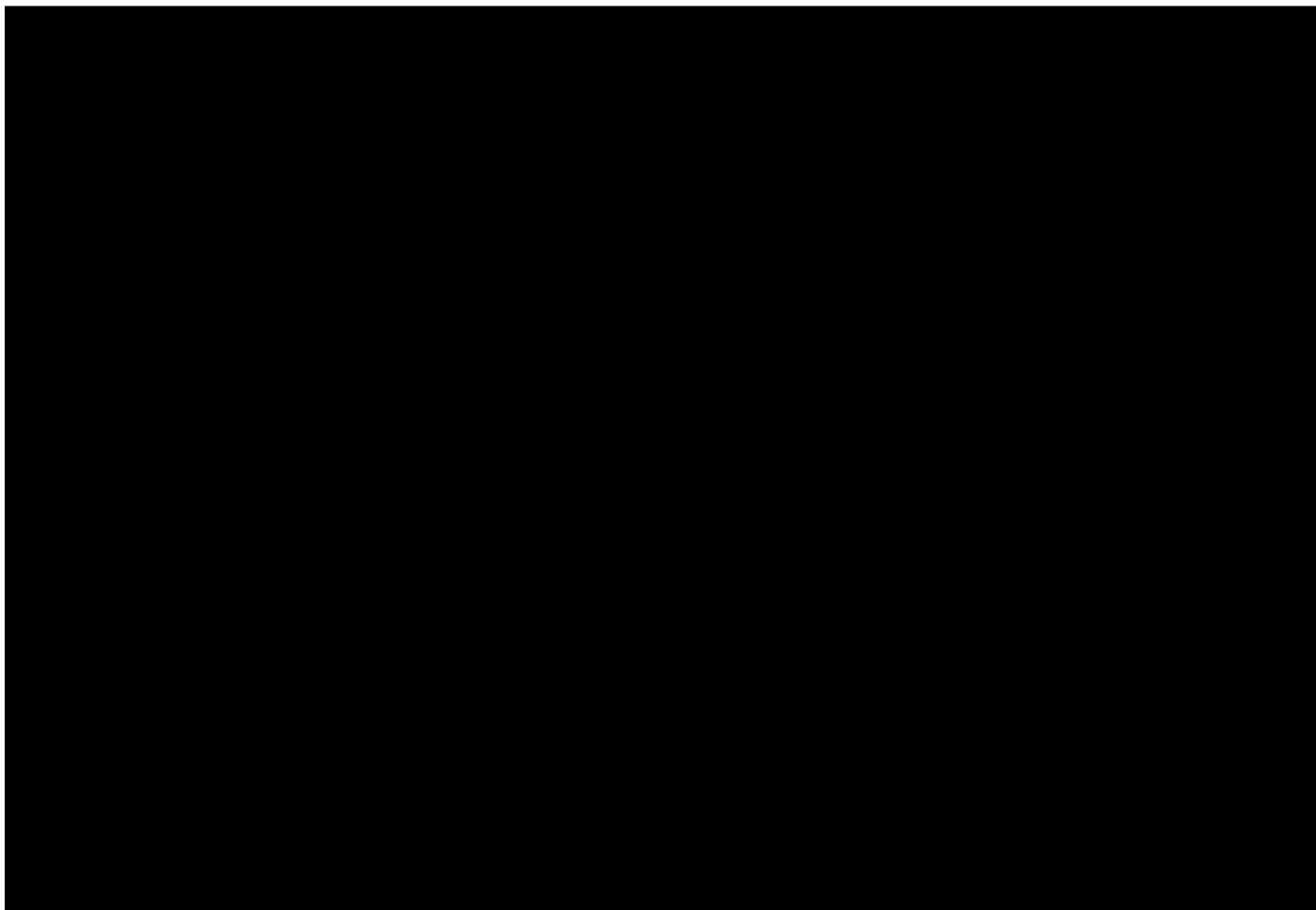
5 Policy Appraisal

- 5.1 It is quite clear from TAN 6 and the accompanying Practice Guidance that there is a strong policy directive towards a more diverse and inclusive rural economy in order to improve the long-term sustainability of the Welsh rural economy. To this end TAN 6 has provided a definition of what enterprises may qualify as appropriate businesses which may occupy rural enterprise dwellings. It states at paragraph 4.3.2:

“...qualifying rural enterprises comprise land related businesses including agriculture, forestry and other activities that obtain their primary inputs from the site, such as the processing of agricultural, forestry and mineral products together with land management activities and support services (including agricultural contracting), tourism and leisure enterprises...” (emphasis added)

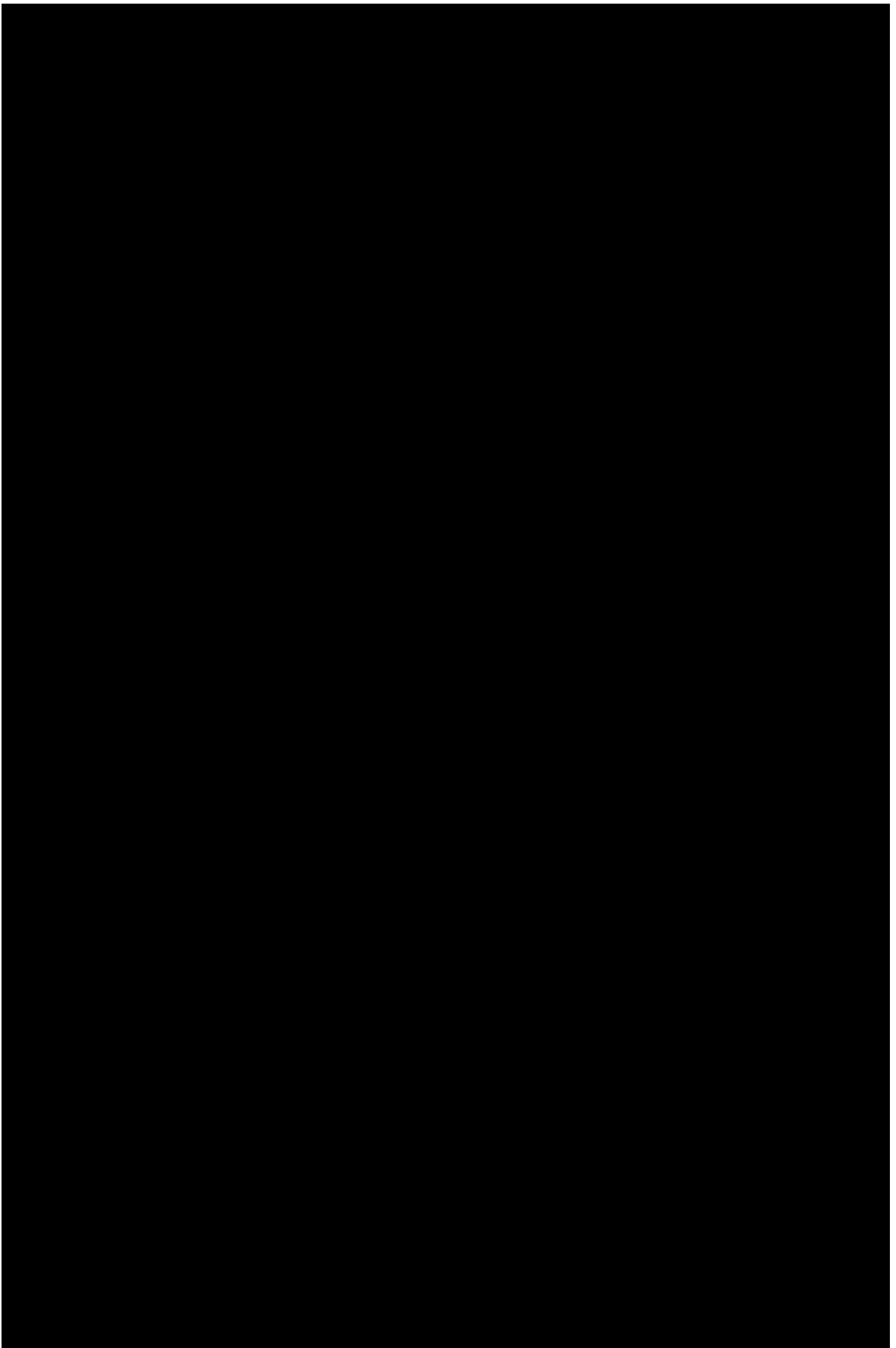
- 5.2 In the 2019 pre-app response, Powys CC also acknowledged that 68 Degrees West was a qualifying rural enterprise but noted that detailed evidence would be required to meet the functional test, explaining why a 24-hour requirement for a senior member of staff living on-site is necessary.

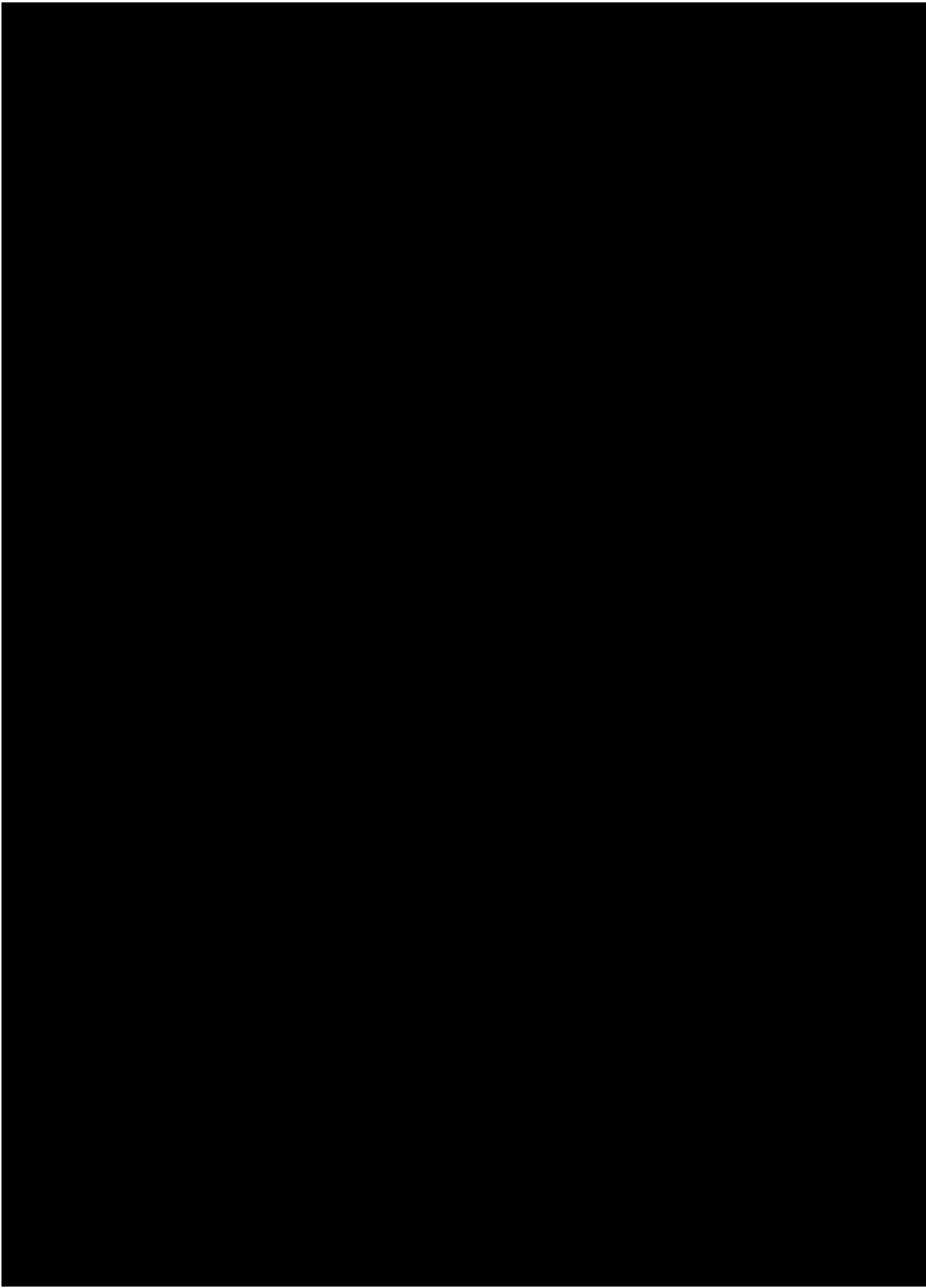
Functional Need

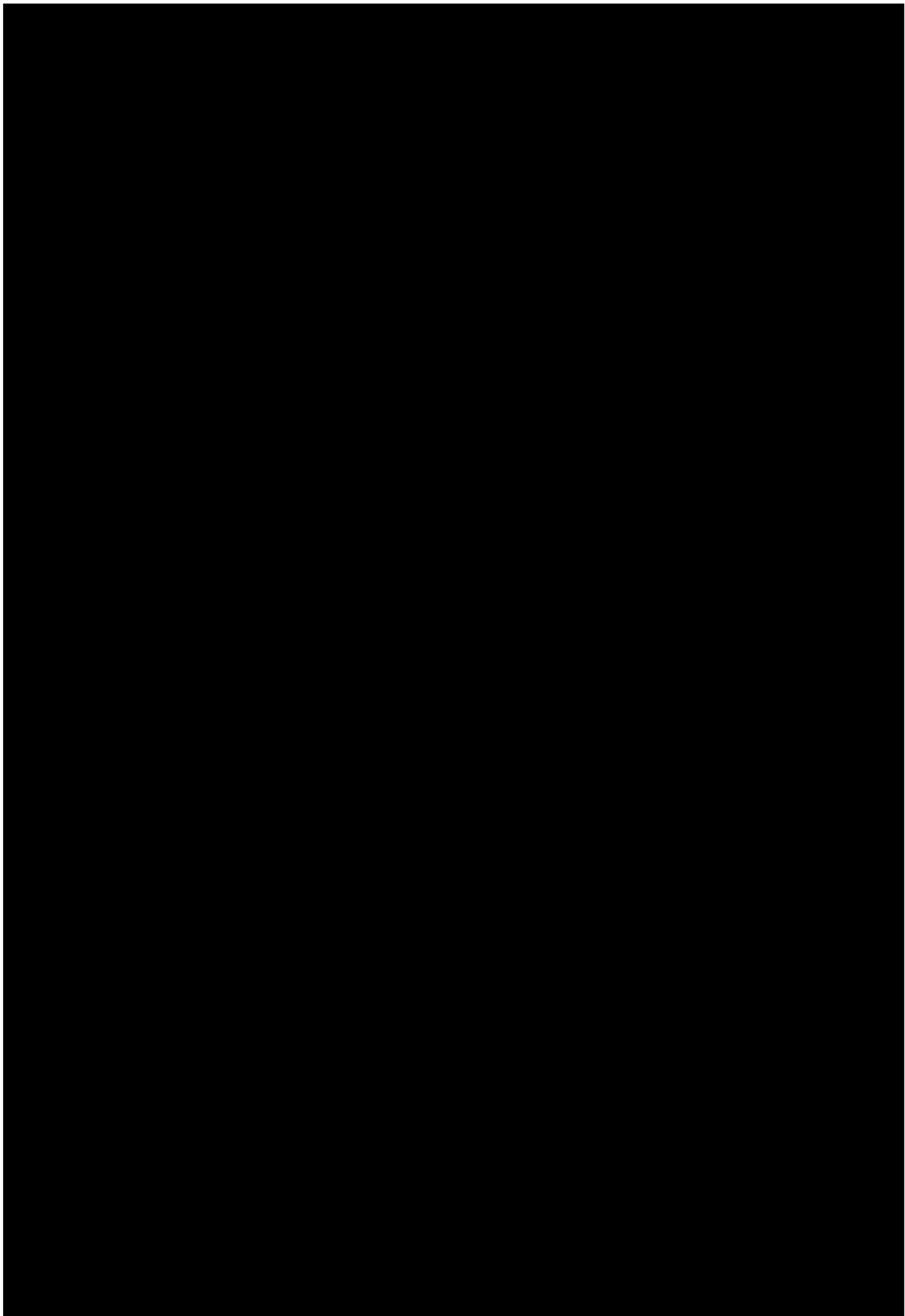


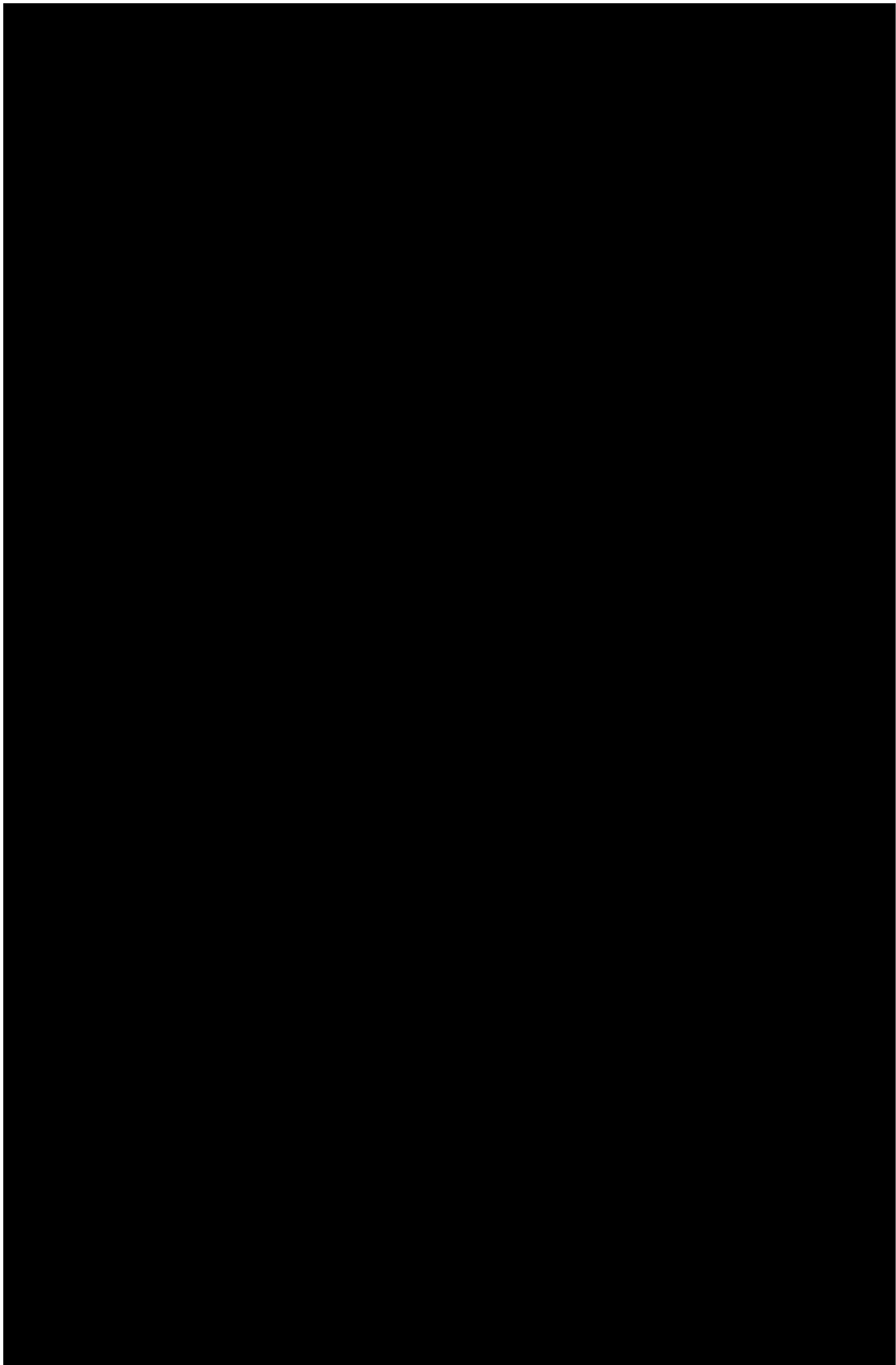
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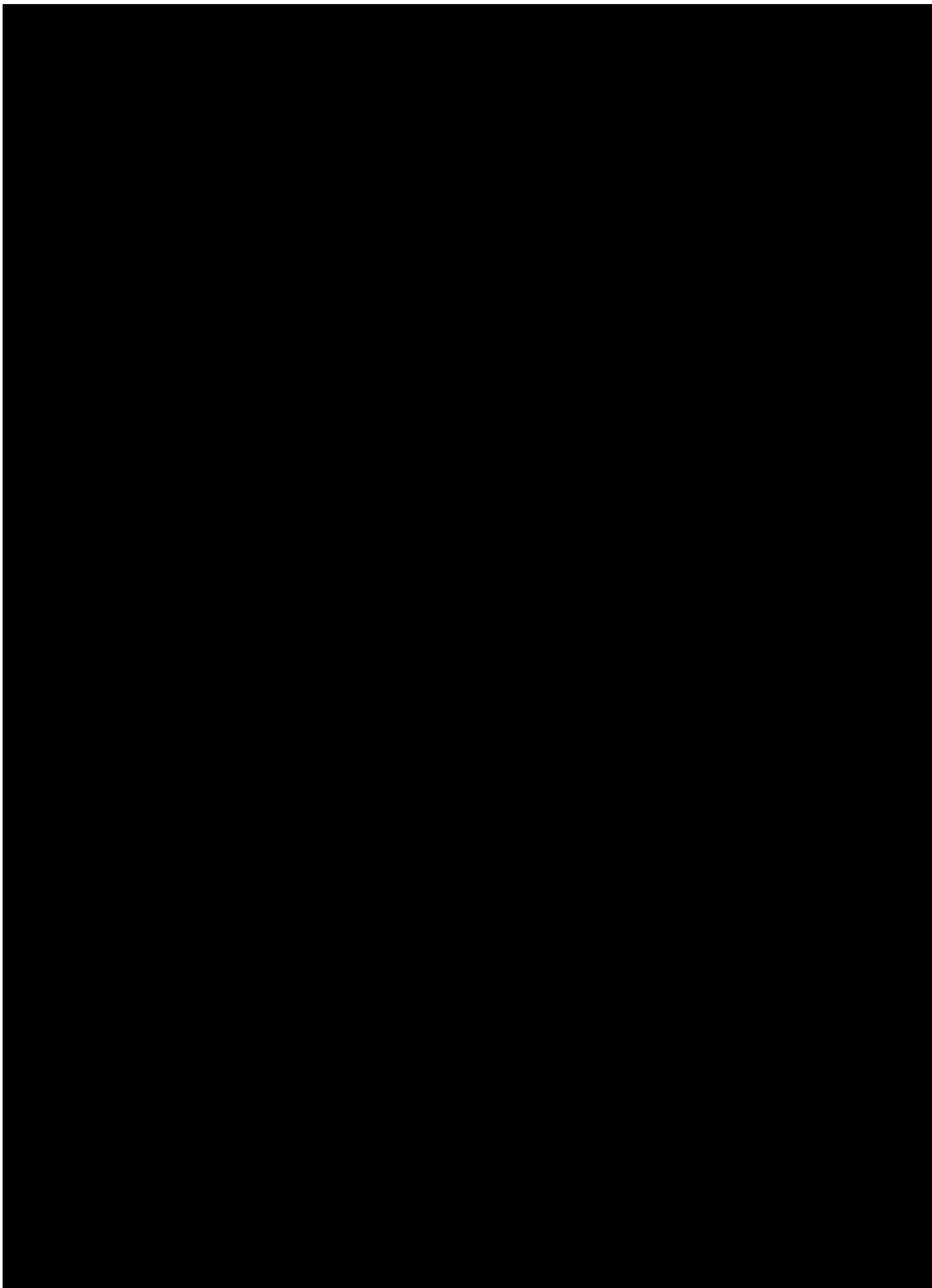
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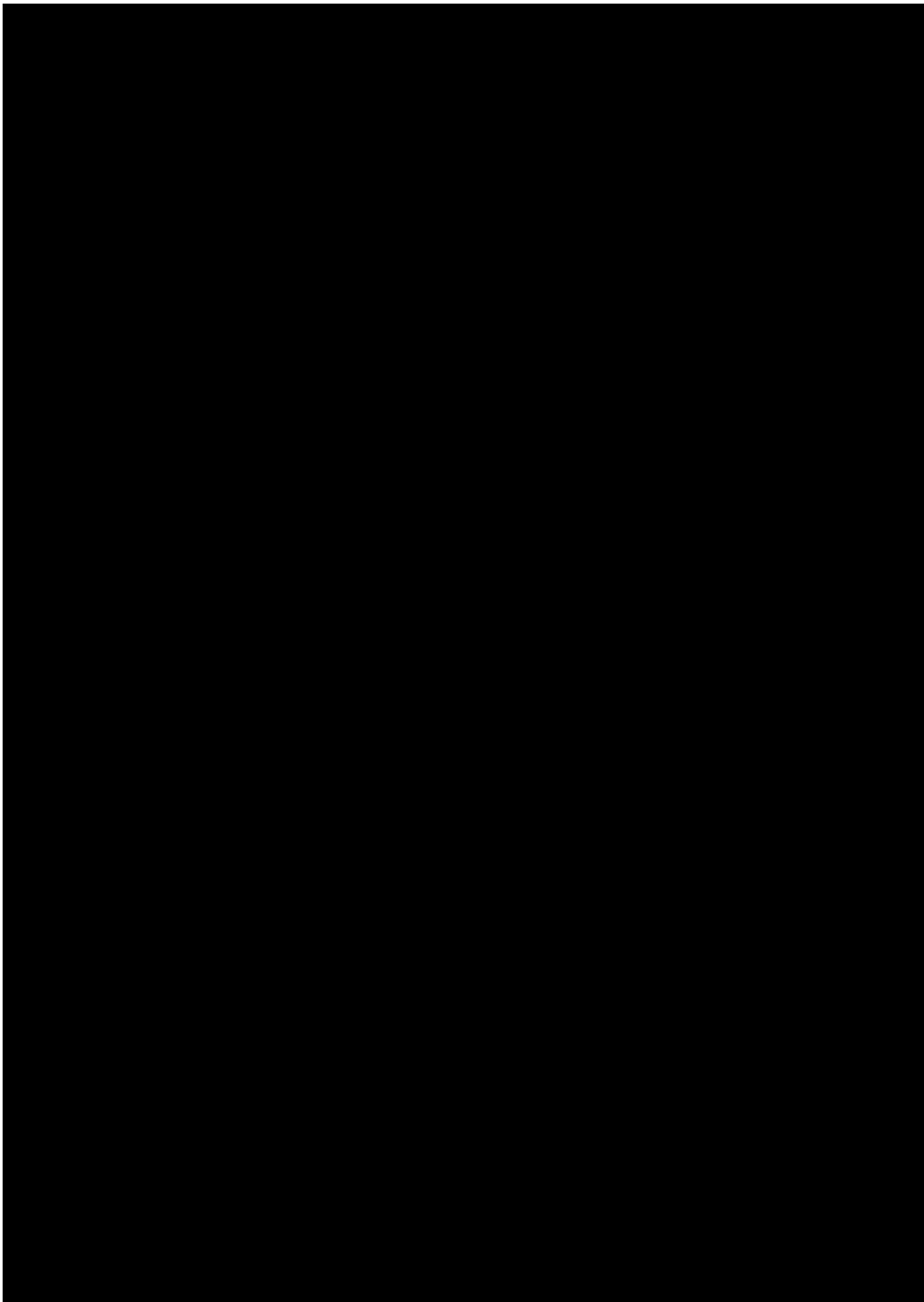


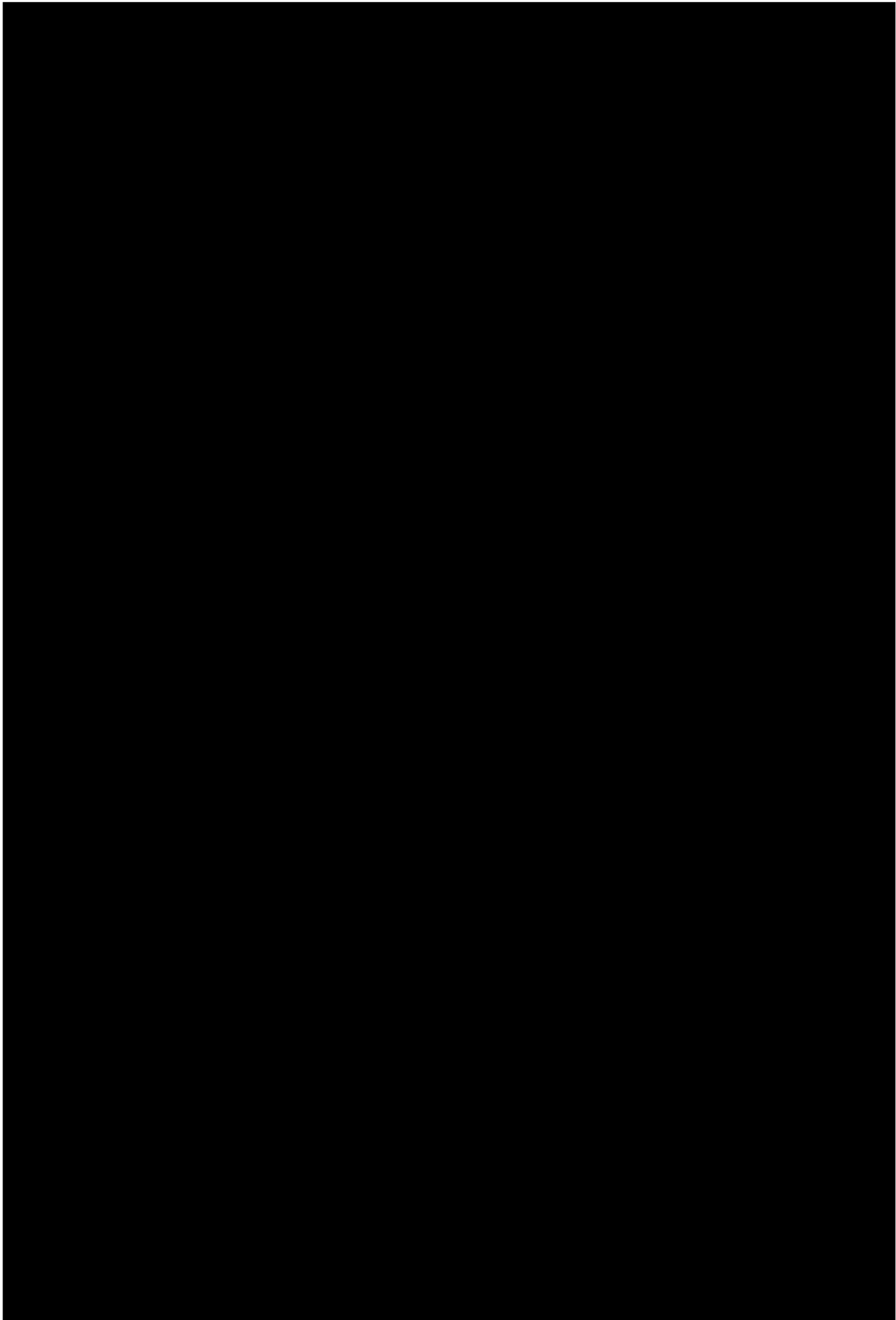


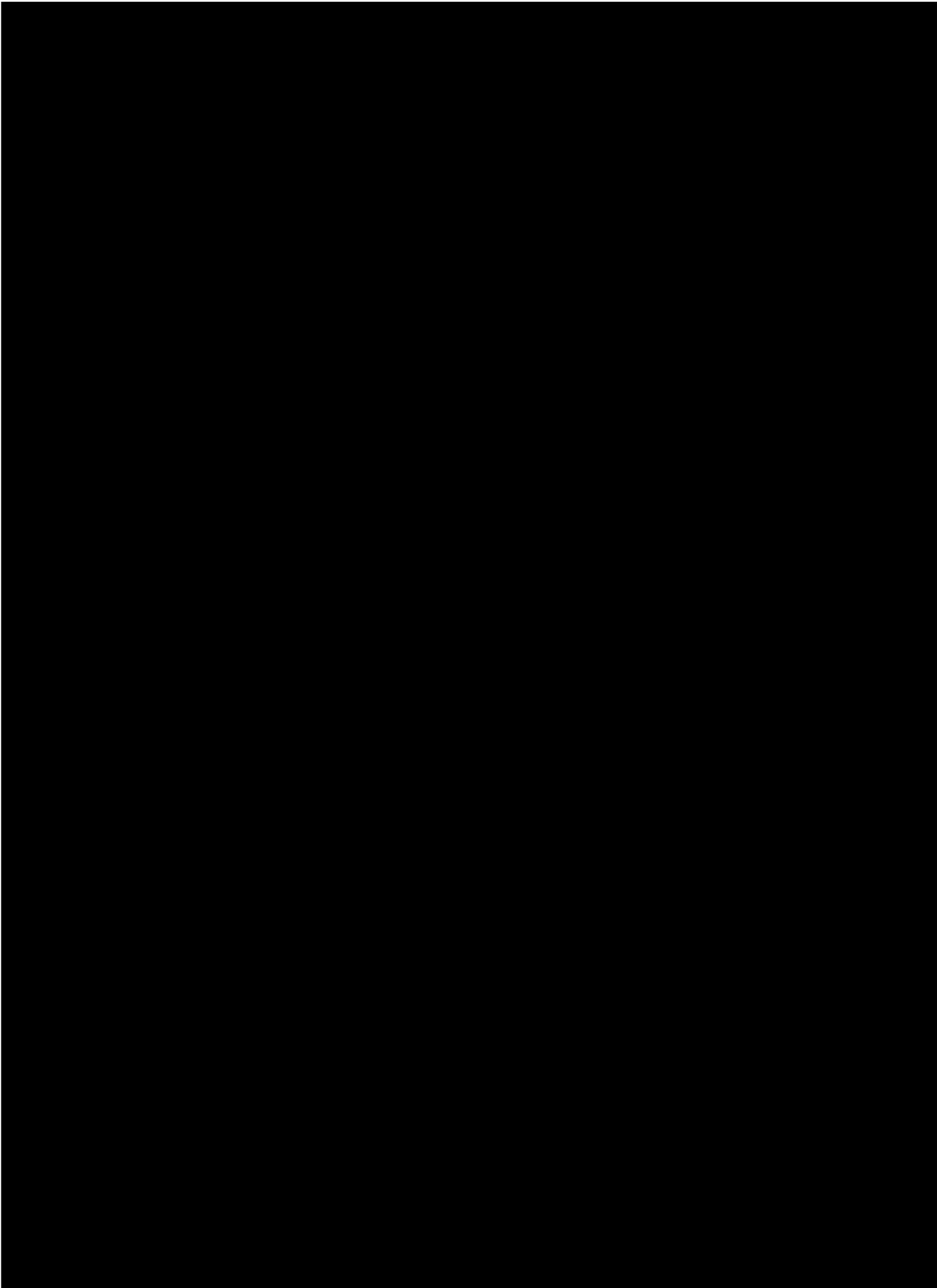












Siting and Access

- 5.48 The siting of the proposed dwelling provides quick access to, and surveillance of, the tourism accommodation area. It would use the same access road as the existing site and is shared with the adjacent Cradoc Golf Club. There would not be an increase in traffic as a result of the dwelling because the applicants have to enter the site a few times each day, due to currently living off-site.
- 5.49 It would not be necessary to make any changes to the access route to enable the construction or occupation of the proposed dwelling.

6 Phosphates and SAC

- 6.1 The application site and the associated business of 68 Degrees West, has a private foul water drainage system utilising a sewage treatment plant, installed in 2018. The plant has the capacity to accommodate 50 persons and was installed prior to introduction of the phosphate targets for water bodies in Special Areas of Conservation (SAC).
- 6.2 The NRW advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation (SACs) (May 2021) states that private sewage treatment systems discharging wastewater to ground should meet British Standard BS 6297 where:
- *“...the drainage field is located more than 40m from any surface water feature such as a river, stream, ditch or drain, and*
 - *the drainage field is located more than 50m from a SAC boundary, and*
 - *the maximum daily discharge rate is less than 2 cubic metres (m³).*
 - *Also, to ensure that there is no significant in combination effect, the discharge to ground should be at least 200m from any other discharge to ground. The density of discharges to ground should also not be greater than 1 for every 4 hectares (or 25 per km²).”*

6.3 The sewage treatment plant in this instance was installed prior to the imposition of the new regime and so does not fall to be considered in this scenario. However, the additional dwelling would marginally increase the loading in the tank, and so would need to be addressed.

6.4 The NRW website providing advice to planning authorities³ notes that:

“proposals that lead to the creation of independent living accommodation as a separate planning unit may lead to an increase in occupancy by residents from outside a SAC river catchment, and in these instances, proposals require further assessment.”

6.5 In this instance, the Applicants already live in the SAC, as tenants in the adjoining property, therefore the phosphate loading is not going to increase. The house that they are currently occupying will be occupied by the landlord’s brother, a farmworker, who currently lives with his parents in one of the neighbouring villages within the SAC, so there will be no increase in phosphate loading in the SAC because there will be no increase in occupants.

6.6 Notwithstanding this, the same website notes that:

“Development proposals resulting in additional wastewater being discharged to an existing private treatment system are not likely to have a significant effect if:

the existing discharge is to ground and

the drainage field is located more than 40m from any surface water feature such as a river, stream, ditch or drain and located more than 50m from a SAC boundary and

the design of the existing private sewage system (including the drainage field) has the capacity to effectively treat and discharge the additional wastewater and

increases in effluent discharge to ground can be made where the discharge remains eligible for an existing exemption under the Environmental Permitting Regulations or can operate in compliance with conditions of an extant environmental permit.”

³ <https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/our-role-in-planning-and-development/advice-to-planning-authorities-for-planning-applications-affecting-phosphorus-sensitive-river-special-areas-of-conservation/?lang=en>

- 6.7 The 2018 installed system is far larger than required for the number of occupants of the site as the Applicants wished to future-proof the system. It discharges to ground and is located well in excess of 40m from any surface water feature and over 50m from a SAC boundary.
- 6.8 The drainage field is a perforated pipe followed by a reedbed system which is a tertiary treatment designed to remove suspended solids and nutrients such as phosphates from the effluent. This system is used commercially in some water treatment works and is seen as a more sustainable alternative to chemical flocculants.
- 6.9 The reedbed is fed by a perforated drainage pipe and a large proportion of the effluent is discharged through this pipe before it gets to the reedbed. The field is unfertilised pasture which is nutrient poor, so the grass roots will search for nutrients, particularly phosphates, thereby removing them from the soil and preventing them being conveyed into the watercourse.
- 6.10 On this basis, the site will not have an adverse impact on the phosphate status of the watercourses feeding the SAC.

7 Conclusions

- 7.1 This statement has been prepared in support of a full planning application for a permanent dwelling for a manager of an existing tourism accommodation business at the award winning 68 Degrees West glamping site, Cradoc, near Brecon.
- 7.2 The business is a well-established tourist accommodation enterprise established in the 1980s and extended in recent years to offer glamping accommodation in pods plus touring caravan pitches. The LPA have been supportive of the expansion through successive applications and the business has now reached the scale where an on-site manager's dwelling is required to meet the needs of the holidaymakers.
- 7.3 Occupancy levels are high throughout the year, but there have been incidents which have necessitated the Applicants attending the site out-of-hours on many occasions. The success of a tourism enterprise is based upon satisfied customers and so prompt attention to detail is required and this cannot continue to be met off-site with plans to increase the number of accommodation units.
- 7.4 Tourism is recognised as a qualifying enterprise for a rural enterprise worker's dwelling, within TAN 6 policy.

- 7.5 The existing arrangement consists of the Applicants living in short-term rented accommodation on the neighbouring farm, but they have to vacate this premises in the near future to enable a farmworker to live on the site.
- 7.6 A calculation of labour requirements has been undertaken and demonstrates that the dwelling would be occupied by a full-time rural enterprise worker.
- 7.7 The business is financially sustainable. The business accounts for the past three years demonstrate that the unit is financially sound and is capable of being sustained for a reasonable period of time.
- 7.8 The proposed dwelling is a three-bedroom dwelling of a reasonable size and which has been found acceptable in successive appeals. The dwelling is affordable to the business as required under TAN 6 policy.
- 7.9 There are no available redundant buildings suitable for conversion to a dwelling and off-site accommodation is neither suitable nor available. In any case, it would be inappropriate to house a key worker off-site, out of close contact with increasing numbers of guests. Evidence has been provided of issues which have occurred when the Applicants have been off-site.
- 7.10 The proposed dwelling would be sited on land owned by the Applicants, in close proximity to, and overlooking the tourist accommodation area.
- 7.11 The provision of an on-site dwelling for a worker is essential to the continued success of the business.
- 7.12 Since the 2019 Pre-Application Response (ref. 19/0057/PRE), which considered that a rural enterprise dwelling was “premature at this time”, and that “a dwelling cannot yet be justified on this site”, there has been another four years’ worth of growth and investment into the site. As such, all concerns regarding the premature nature, and justification for the dwelling, have since been overcome (as outlined in this statement). The dwelling is, therefore, now unequivocally acceptable.
- 7.13 The proposed dwelling would result in phosphate neutrality and would not adversely impact upon the neighbouring SAC.