

# **FULL PLANNING APPLICATION**

**68 DEGREES WEST GLAMPING, BRECON, LD3 9LP**

**CONSTRUCTION OF A RURAL ENTERPRISE DWELLING &  
ASSOCIATED ACCESS**

**PLANNING, DESIGN AND ACCESS STATEMENT**

**AUGUST 2023**



**Geraint John Planning**

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## 1.0 INTRODUCTION

- 1.0 This Planning, Design and Access Statement has been prepared in support of a planning application, submitted on behalf of 68 Degrees West Glamping, in relation to the following development proposal, located at the 68 Degrees West Glamping, Brecon:

*'CONSTRUCTION OF A RURAL ENTERPRISE DWELLING & ASSOCIATED ACCESS'*

### Purpose and Structure of this Statement

- 1.1 This Planning, Design and Access Statement outlines the context within which the application is made, and provides a detailed examination of the main planning considerations raised by the proposals, together with reasoned justification in support of the proposed development. The statement is structured as follows:

- **Section 2** provides a description of the characteristics of the site and surroundings.
- **Section 3** provides details of the development proposals.
- **Section 4** outlines the relevant planning policy in relation to the site and the development.
- **Section 5** provides an overview of the pre-application response previously obtained in respect to the proposal;
- **Section 6** analyses the key planning considerations arising from the proposed development (in light of the planning policy context).
- **Section 7** lays out a conclusion and summary of the considered acceptability of the proposed development.

### Documents submitted in support of Application

- 1.2 The following documents are submitted in support of the application:
- Application Forms;
  - Planning, Design & Access Statement (prepared by 'Geraint John Planning Ltd');
  - Rural Enterprise Dwelling Appraisal (prepared by 'Reading Agricultural Consultants');
  - Preliminary Ecological Appraisal (prepared by 'europaeus land management services');
  - Plans and Drawings (prepared by 'Barry Tomlinson Architectural Services Ltd');
    - Site Location Plan (dwg no. 23/4695/1);
    - Existing Block Plan (dwg no. 23/4695/2);
    - Proposed Block Plan (dwg no. 23/4695/3);
    - Proposed Floor Plans and Elevations (dwg no. 23/4695/4);
    - Proposed Floor Plans and Elevations Garage (dwg no. 23/4695/5); and
    - Proposed Landscaping Plan (dwg no. 23/4695/6).

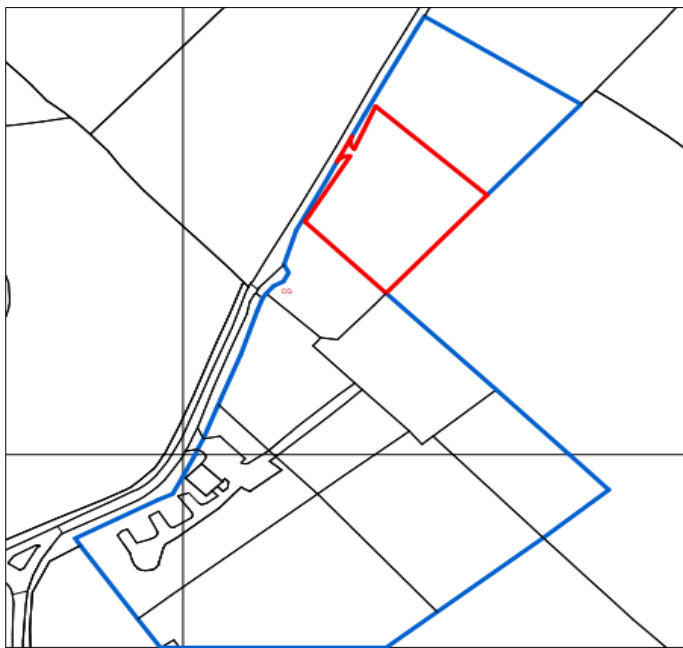
### Appendices

- **Appendix A** – Pre-Application Response (ref. 19/0057/PRE)
- **Appendix B** - 2019 Outline Application (ref. 19.1590.OUT) Email Dialogue (1)
- **Appendix C** - 2019 Outline Application (ref. 19.1590.OUT) Email Dialogue (2)
- **Appendix D** - Application (ref. 22.0314.FUL) Officer Report
- **Appendix E** - 2019 Outline Application (ref. 19.1590.OUT) Officer Report
- **Appendix F** - Treatment Plant Signed Permit from NRW

## 2.0 SITE AND SURROUNDINGS

### Site Location

- 2.1 68 Degrees West Glamping is an established glamping escape for tourists located within the administrative boundary of Powys County Council.
- 2.2 The application site is approximately 540m northeast of the settlement of Cradoc and is adjacent to Cradoc Golf Course. It accessed off the C0050 classified road to the north and uses an existing track / unnamed road.
- 2.3 The site is adjacent to the existing glamping and business site/operations which is located in the adjoining fields to the south – comprising of caravans, tents and wooden camping pods.
- 2.4 For context, the site location plan and aerial view of the site is shown below:



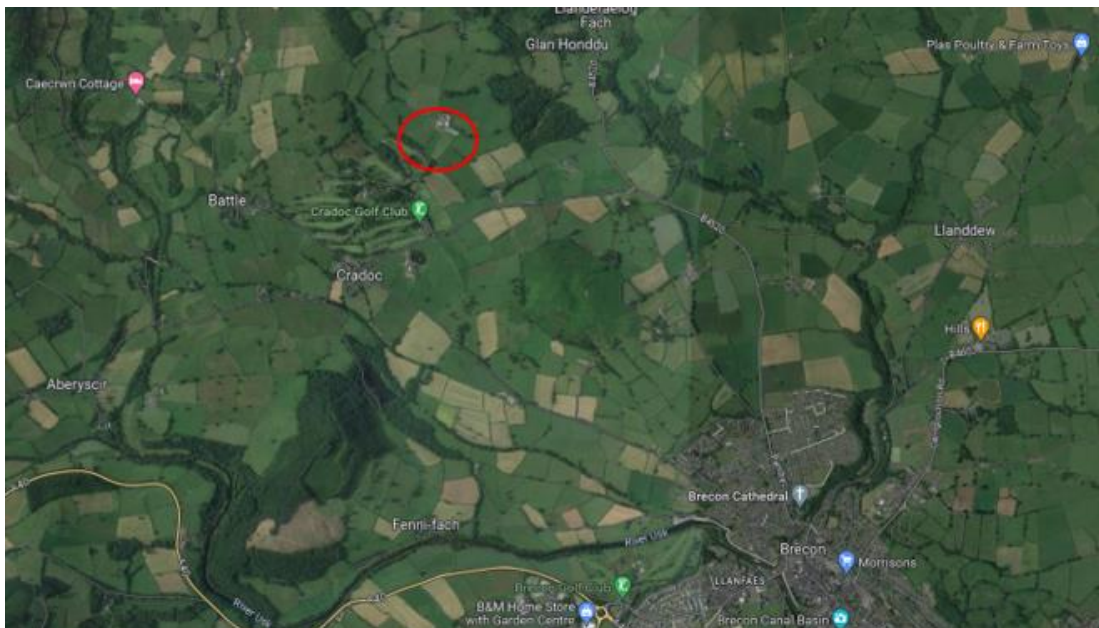
Site location plan (dwg ref: 23/4695/1)



*Aerial view of the site's context (approx. site location outlined in red and approx. business location in yellow)*

### *Surroundings*

- 2.5 The site is set northwest of the town of Brecon, and is surrounded by predominantly agricultural fields, as well as a handful of rural enterprises (as depicted by the below wider aerial view extract below).



*The site in a wider context (approx. site location outlined in red)*

*Sustainability and Connectivity*

2.6 The site is located within the following range of services and amenities:

- Cradoc Golf Club (0.3 miles away);
- Snac Casual (0.8 miles away);
- Cradoc School (0.8 miles away);
- Battle Bodies Gym (1.1 miles away); and
- St. Cynog Church (1.2 miles away).

2.7 As per the above, although located within the countryside, the site is within proximity to key local facilities and services. Further to this, the centre of Brecon is only circa 3 miles from the site which offers an abundance of shops, services, and facilities.

2.8 In terms of public transport, the site is located circa 2.6 miles from the following services:

- Bus services (40A, 40B, T4, T6, and T6X).

Planning History

2.9 A planning history search was undertaken via Powys’s online planning service for the site and the surrounds. The search revealed that the site itself is not subject to any planning history, albeit the adjoining fields and further surrounds comprise recent planning permissions (including the glamping business to which this application is related).



*Powys planning history map extract (approx. site location outlined in blue)*

*The Surrounds*

Application Ref.	Location	Proposal	Decision	Date of Decision
22/2196/RES	Land At 68 Degrees West Glamping Cradoc Brecon LD3 9LP	Reserved matters application in connection with Outline approval 19/1590/OUT for landscaping details	Approve	09/03/2023
19/1590/OUT	Land Adjoining 68 Degrees West Glamping Site, Cradoc, Brecon, Powys, LD3 9LP	Outline application for the proposed detached utility building to service existing campsite (for provision of office/reception, secure storage of grounds maintenance machinery, maintenance equipment, indoor games room, WC, Laundry and kitchen)	Approve	30/07/2020
P/2017/0584	Pentwyn Farm, Cradoc, Brecon, Powys, LD3 9LP	Change of Use – Proposed extension to caravan site (to include caravans, tents,	Consent	06/10/2017

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<b>Application Ref.</b>	<b>Location</b>	<b>Proposal</b>	<b>Decision</b>	<b>Date of Decision</b>
		log pods, toilet/shower block and parking bays) & improved landscaping		

- 2.10 The above planning applications relate to the recent development of 68 Degrees West Glamping's tourism establishment – the associated enterprise to the proposed dwelling.
- 2.11 The approval of these applications outlines Powys's position in supporting and expanding the existing rural enterprise.

### 3.0 DEVELOPMENT PROPOSALS

- 3.1 Chapter 3 of PPW11 considers the importance of Good Design in Making Better Places. Accordingly, paragraph 3.3 states that *'good design is fundamental to creating sustainable places where people want to live, work and socialise'*. This section goes on to state that *'design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places'*.
- 3.2 Similarly, paragraph 3.4 notes how *'design is an inclusive process, which can raise public aspirations, raise civic pride and create a sense of place and help its future. For those proposing new development, early engagement can help to secure public acceptance of new development. Meeting the objectives of good design should be the aim of all those involved in the development process and applied to all development proposals, at all scales'*.
- 3.3 Paragraph 3.17 of PPW11 provides guidance on Design and Access Statements and notes how this type of document *'communicates what development is proposed, demonstrates the design process that has been undertaken and explains how the objectives of good design and placemaking have been considered from the outset of the development process. In preparing design and access statements, applicants should take an integrated and inclusive approach to sustainable design, proportionate to the scale and type of development proposal'*.
- 3.4 This chapter provides a description of the development proposals.

#### Background to the Proposals

- 3.5 The proposals is for a full planning application for a rural enterprise dwelling at 68 Degrees West Glamping. The applicant and enterprise owner, Mr Lewis Gould and Miss Rachel Witcomb, operate the rural enterprise (68 Degrees West Glamping) which currently consists of:
- 6.5 acres of land;
  - 7 Wooden Glamping Huts (permission for 20);
  - 7 Hot Tubs (associated with 7 Wooden Glamping Huts);
  - 10 tent pitches;
  - 10 caravan pitches;
  - Toilet and Shower Block; and
  - Utility Building/Maintenance Building – which includes a laundry room, machinery store, small office, games room and toilets.
- 3.6 In light of the applicant's constant required presence on the site, this application is seeking a rural enterprise dwelling for themselves, as they currently live offsite, and away/distant from the enterprise.
- 3.7 In order to evidence the need for this rural enterprise dwelling, and to highlight that the proposals satisfy all the TAN 6 tests for a Rural Enterprise Dwelling, a Rural Enterprise Appraisal prepared by Reading Agricultural Consultants. This should be read in conjunction with this statement, and given considerable weight.
- 3.8 The applicant's ability to fully satisfy all the TAN 6 tests for a Rural Enterprise Dwelling (as confirmed by the Rural Enterprise Appraisal), is also fully justified in the Material Consideration Section of this statement.

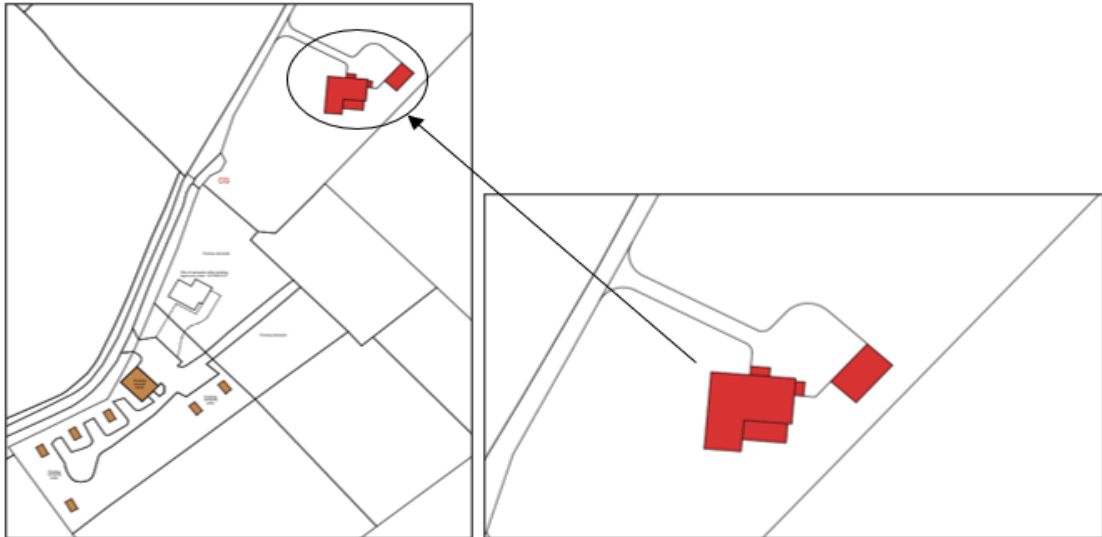


## The Proposals

3.9 The application seeks the approval of Full Planning Permission for the:

*'CONSTRUCTION OF A RURAL ENTERPRISE DWELLING & ASSOCIATED ACCESS'*

3.10 The proposal seeks planning permission for the construction of a two-storey rural enterprise dwelling (and associated garage) for the purpose of providing essential accommodation for the owners of 68 Degrees West Glamping - which is necessary for the enhanced operation of the existing enterprise. The proposed block plan is extracted below for reference:

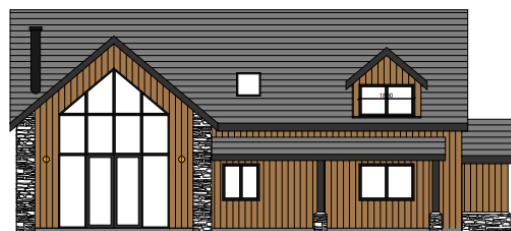


*Proposed block plan (dwg ref: 23/4695/3)*

3.11 As per the above block plan, the proposed rural enterprise dwelling is outlined in red to the north, whilst the existing glamping units, shower block & associated utility building (of which this proposal relates to) is outlined in the adjoining fields to the south.

3.12 The proposed elevations of the rural enterprise dwelling and associated garage are shown below:

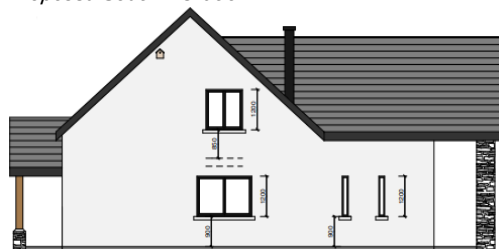
*Elevations (dwg ref: 23/4695/4)*



*Proposed South Elevation*



*Proposed North Elevation*

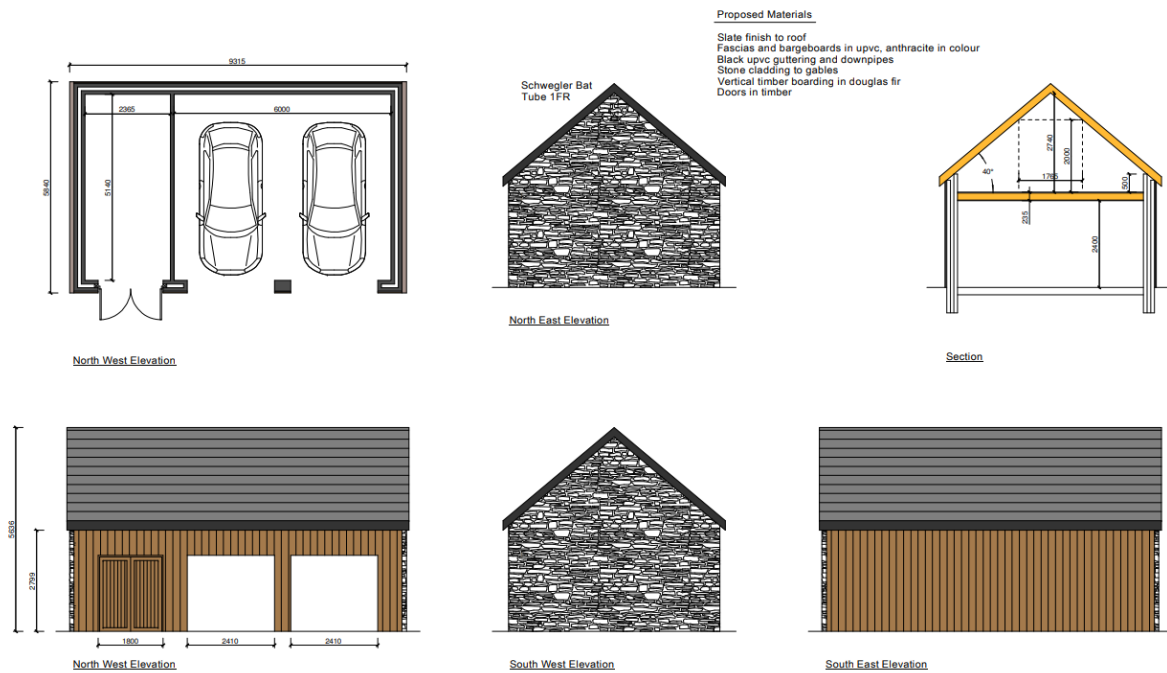


*Proposed West Elevation*



*Proposed East Elevation*

*Elevations (dwg ref: 23/4695/5)*

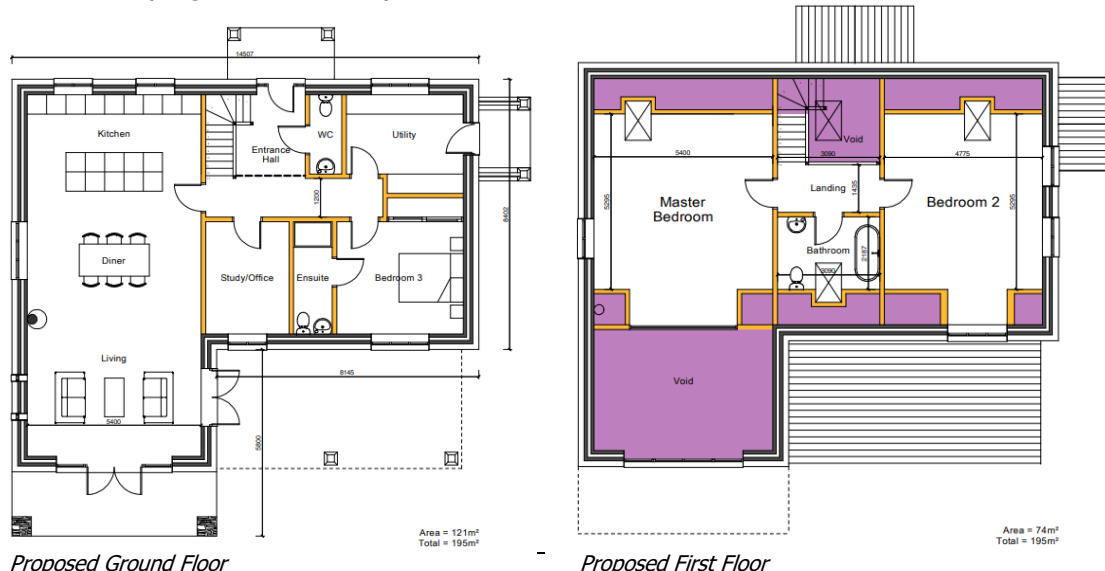


3.13 As per the elevational drawings above, the design of the proposed rural enterprise dwelling and garage comprises of traditional and sympathetic materials, in order to create an external appearance that is in-keeping with the natural rural surrounds. The proposed materials schedule is outlined below for reference:

- Roof: Slate
- Fascias & Bargeboards: UPVC Anthracite
- Windows: UPVC Anthracite
- Guttering & Downpipes: UPVC Black
- Walls: Stone Cladding
- K Rend: Off White
- Timber Boarding: Douglas Fir

3.14 The proposed floor plans of the rural enterprise dwelling are shown overleaf:

*Floor Plans (dwg ref: 23/4695/4)*



3.15 The proposal comprises a modest two-storey development. The accommodation schedule is shown below for reference:

<i><b>Floor</b></i>	<i><b>Schedule</b></i>	<i><b>Size</b></i>
Ground Floor	<ul style="list-style-type: none"> <li>• Entrance Hall</li> <li>• Kitchen/Diner/Living Space</li> <li>• Study/Office</li> <li>• Bedroom 1 (ensuite)</li> <li>• WC</li> <li>• Utility</li> </ul>	121 m <sup>2</sup>
First Floor	<ul style="list-style-type: none"> <li>• Bedroom 2</li> <li>• Bedroom 3</li> <li>• WC</li> </ul>	74 m <sup>2</sup>

3.16 As per the above proposed plans, it is considered that the proposal has been designed to complement and enhance the character of the surrounding area in terms of siting, appearance, integration, scale, height, massing and design detailing.

**Access, Highways and Parking**

3.17 As shown on the Block Plan (dwg ref: 23/4695/3), access into the site is to be created onto/ via the existing unnamed track that adjoins the site to the west.

3.18 In terms of form, scale and access arrangements, the proposal is reflective of the accesses of the existing rural enterprises in the vicinity of the site. The new access has appropriate visibility splays, and turning space within the site. Furthermore, as the lane is a single track lane with low level traffic movements (it is a quiet road only used to access 68 Degrees West Glamping and Pentwyn Farm to the north), it is therefore not envisaged that any issues will arise from this.

## 4.0 PLANNING POLICY CONTEXT

4.1 A review of the planning policy context associated with the site and proposed development (at the national and local level) is provided within this section of the Statement.

4.2 The key planning policies of relevance to the determination of the application are outlined below. A detailed assessment of the accordance of the proposed development with these policies is provided in Section 5 (Material Considerations) of this Statement.

### **National Planning Policy**

4.3 The following policy / guidance documents prepared at the national (Welsh Government) level are of relevance to the determination of the application.

#### Future Wales: The National Plan 2040

4.4 Future Wales: The National Plan 2040 was adopted in February 2021 and replaces the Wales Spatial Plan as the national development framework setting the direction for development in Wales up to 2040. Future Wales represents the highest tier of development plan and focuses on solutions at a National Scale setting out a framework which will inform Strategic Development Plans at a regional level and Local Development Plans (LDPs) at local authority level. The document consists of a development plan which aims to set out a strategy for addressing key national priorities through the planning system. These include, but are not limited to, developing a vibrant economy and improving the health and well-being of communities.

4.5 Policy 4 of Future Wales (Supporting Rural Communities) states that the '*Welsh Government supports sustainable and vibrant rural communities*'. Similarly, Policy 5 (Supporting the rural economy) states that '*The Welsh Government supports sustainable, appropriate and proportionate economic growth in rural towns that is planned and managed through strategic and local development plans*'. In addition to this, the accompanying text goes on to note how '*thriving, resilient and sustainable rural settlements are characterised by a rich mix of housing, employment, services and infrastructure, located in the right places to meet the needs and future aspirations of the population*'.

#### Planning Policy Wales: Edition 11 (February 2021)

4.6 Planning Policy Wales (PPW) forms the overarching national planning policy document within Wales, providing guidance to Local Planning Authorities (LPAs) for the preparation of development plans and the determination of planning applications through their development management functions.

#### *Placemaking*

4.7 Paragraph 2.8 sets out the key drivers for placemaking, stating: "*Planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales. This can be done through maximising their contribution to the achievement of the seven well-being goals and by using the five Ways of Working, as required by the Well-being of Future Generations Act. This will include seeking to maximise the social, economic, environmental and cultural benefits, while considering potential impacts when assessing proposals and policies in line with the Act's Sustainable Development Principle.*"

#### *Design*

4.8 Paragraph 3.3 states: "*Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the*



*relationship between all elements of the natural and built environment and between people and places. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surrounding area."*

4.9 Figure 8 sets out the objectives of Good Design in an illustrative / diagrammatic manner:



Figure 8 of PPW 11

4.10 Paragraph 3.16 states: *"Planning authorities should through a process of negotiation seek to improve poor or average developments which are not well designed, do not take account of their context and consider their place, or do not meet the objectives of good design. Where this cannot be achieved proposals should be rejected. However, they should not attempt to impose a particular architectural taste or style arbitrarily and should avoid inhibiting opportunities for innovative design solutions. If a decision maker considers that a planning application should not be approved because of design concerns they should ensure that these reasons are clearly articulated in their decision and justified with sufficient evidence. In the event of an appeal, in these circumstances, the Planning Inspectorate will need to examine the issues in detail and consider if the proposal meets the objectives of good design including the relationship between the site and its surroundings."*

*Development in the Countryside*

4.11 Paragraph 3.60 states: *"Development in the countryside should be located within and adjoining those settlements where it can best be accommodated in terms of infrastructure, access, habitat and landscape conservation. Infilling or minor extensions to existing settlements may be acceptable, in particular where they meet a local need for affordable housing or it can be demonstrated that the proposal will increase local economic activity. However, new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should be of a scale and design that respects the character of the surrounding area. Development in the Countryside."*

### *Housing*

- 4.12 Paragraph 4.2.17 states that *"Maximising the use of suitable previously developed and/or underutilised land for housing development can assist regeneration and at the same time relieve pressure for development on greenfield sites."*

### *Rural Enterprise Dwellings*

- 4.13 Paragraph 4.2.36 states that *"The purpose of 'rural enterprise dwellings' is to enable rural enterprise workers to live at or close to their place of work, including encouraging younger people to manage farm businesses and supporting the diversification of established farms. Rural enterprise dwellings represent one of the few circumstances in which isolated new residential development in the open countryside may be justified"*.
- 4.14 Paragraph 4.2.37 states that *"Applications for rural enterprise dwellings must only be permitted where the rural enterprise dwelling appraisal provides conclusive evidence of the need for the dwelling. In order to ensure that rural enterprise dwellings are retained for their intended purpose a condition restricting the occupancy of the property must be applied. Rural enterprise dwellings should also be classified as affordable housing as defined in TAN 2: Planning and Affordable Housing, to ensure that the dwelling remains available to meet local affordable housing need should the original justification cease to exist"*.

### *Economic Development*

- 4.15 Paragraph 5.4.4 states that *"Wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration."*

### Technical Advice Notes (TANs)

- 4.16 Technical Advice Notes (TANs) supplement the policy principles of PPW and add further detail on issues which might affect development potential of the site. TANs which are considered relevant to the proposal and should therefore be given weight are:

TAN	Title
TAN 6	Planning for Sustainable Rural Communities (2010)
TAN 12	Design (2016)

### *TAN 6 – Planning for Sustainable Rural Communities (2010)*

- 4.17 TAN 6, adopted in July 2010, provides practical guidance on the role of the planning system in supporting the delivery of sustainable rural communities. In particular, this TAN highlights how the planning system can contribute to sustainable rural economies, sustainable rural housing, sustainable rural services and sustainable agriculture. In light of the site's location outside the settlement boundary and within a countryside designation, this guidance is deemed to be the most relevant to the development proposals sought.
- 4.18 Paragraph 4.3.1 states that *"one of the few circumstances in which new isolated residential development in the open countryside may be justified is when accommodation is required to enable rural enterprise workers to live at, or close to, their place of work. Whether this is essential in any particular case will depend on the needs of the rural enterprise concerned and not on the personal preference or circumstances of any of the individuals involved. Applications for planning permission for new rural enterprise dwellings should be carefully assessed by the planning authority to ensure that a departure from the usual policy of restricting development in the open countryside can be fully justified by reference to robust supporting evidence"*. For this reason, the criteria set out within TAN 6 are of particular relevance to this proposal.

*New Dwellings on Established Rural Enterprises*

- 4.19 Paragraph 4.4.1 states that: *"New permanent dwellings should only be allowed to support established rural enterprises providing:*
- 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".*
- 4.20 Paragraph 4.5.2 states that: *"In these circumstances a rural enterprise dwelling may be considered favourably provided the criteria set out above and in paragraph 4.4.1 c - e are met. These special policy exceptions will only apply to the first additional dwelling to be attached to an established farm after this TAN comes into force and not to subsequent dwellings".*

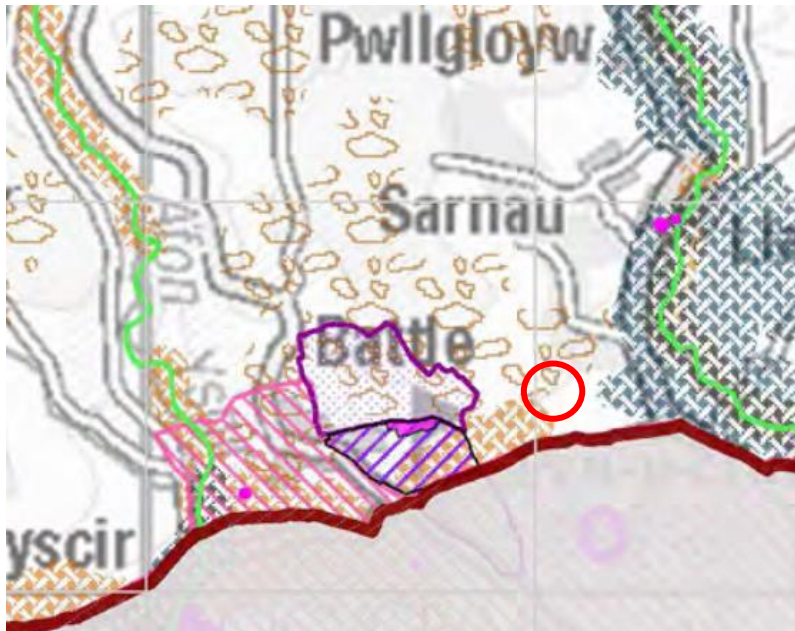
*Rural Enterprise Dwelling Appraisals*

- 4.21 Paragraph 4.7.1 states that: *"Planning applications for new permanent and temporary rural enterprise dwellings in the open countryside need to be supported by robust evidence. A Rural enterprise dwelling appraisal must accompany planning applications for this type of development and include information sufficient to enable the planning authority to make a full and effective assessment. The appraisal should address the following tests:*
- The functional test to provide evidence of whether there is a need for a resident worker for the proper functioning of the enterprise.*
  - The time test to provide evidence of the labour requirement for the worker who is working on the justifying enterprise.*
  - The financial test to provide evidence of the economic sustainability of the justifying enterprise and identify the size of dwelling that the enterprise can sustain, ensuring that the size of the dwelling is commensurate with its functional need and financial justification.*
  - The other dwellings test to identify whether there is an existing dwelling or building suitable for conversion on the enterprise or dwelling in the locality that could meet the identified functional need.*
  - Other normal planning requirements test to demonstrate that the dwelling is suitably located to fulfil its identified need and to minimise impact on the wider environment."*
- 4.22 Given the above, a Rural Enterprise Dwelling Appraisal has been produced by 'Reading Agricultural Consultants' is submitted alongside, and in support of, this application. This provides robust evidence highlighting how the above tests are satisfied.








**Local Planning Policy**

- 4.23 The current (adopted) Development Plan for Powys County Council consists of the following:
- Powys CC Adopted Local Development Plan (2011 - 2026) (adopted 17<sup>th</sup> April 2018).
- 4.24 An extract from the associated Proposals Map is provided below:



*Extract from the LDP Proposals Map (approx. site location shown in red)*

Powys CC LDP Proposals Map Key			
	Site		Historic Park and Garden Essential Setting (SP7)
	Historic Park and Garden Park Boundary (SP7)		Sandstone Category 2 Resource Safeguarding Area (SP7, DM8)
	Sand and Gravel Category 2 Resource Safeguarding Area (SP7, DM8)		

- 4.25 Within the LDP, the key planning designations at the local level of relevance to the site and proposals are as follows (as indicated by the extract from the LDP Proposals Map above):
- Within or adjacent to a Sandstone Category 2 Resource Safeguarding Area;
  - Within or adjacent to a Sand and Gravel Category 2 Resource Safeguarding Area;
  - and
  - Within relative proximity to, albeit outside of a, Historic Park and Garden Essential Setting.



4.26 In light of the above, the main LDP policies relevant to this proposal are considered to be:

- Policy SP1 – **Housing Growth:** Over the Plan period 2011-2026, the LDP will seek to maintain a 5-year supply of land for housing and provides land for 5,588 dwellings to meet the dwelling requirement of 4,500 additional dwellings.
- Policy SP2 – **Employment Growth:** In order to sustain the communities and the economy of Powys and to provide job opportunities for all ages, particularly young people, it is important that the LDP supports economic development.
- Policy SP3 – **Affordable Housing Target:** The provision of affordable housing will be controlled to ensure that dwellings remain affordable and available to those in local need in perpetuity.
- Policy SP5 – **Settlement Hierarchy:** The LDP spatial strategy is based on a sustainable settlement hierarchy to accommodate sustainable growth.
- Policy SP6 – **Distribution of Growth across the Settlement Hierarchy:** Policy SP6 distributes growth across the settlement hierarchy to reinforce and create a sustainable pattern of development.
- Policy SP7 – **Safeguarding of Strategic Resources and Assets:** Development proposals must not have an unacceptable adverse impact on the resource or asset and its operation.
- Policy DM2 – **The Natural Environment:** Development proposals shall demonstrate how they protect, positively manage and enhance biodiversity and geodiversity interests.
- Policy DM7 – **Dark Skies and External Lighting:** Development proposals involving external lighting will only be permitted when a lighting scheme has been provided that demonstrates that the lighting will not cause detriment to the surrounds.
- Policy DM13 – **Design and Resources:** Development proposals must be able to demonstrate a good quality design and shall have regard to the qualities and amenity of the surrounding area.
- Policy H1 – **Housing Development Proposals:** Policy H1 identifies suitable locations for new housing within the settlement hierarchy to support the delivery of a sustainable pattern of development.
- Policy T1 – **Travel, Traffic and Transport Infrastructure:** The policy seeks to enable transport and traffic infrastructure improvements to ensure an efficient, effective and integrated system but one which has regard to the safety of all road users.
- Policy TD1 – **Tourism Development:** New tourist development is encouraged however must not have an unacceptably adverse impact upon the character and appearance of an area.

### Supplementary Planning Guidance

4.27 The following Supplementary Planning Guidance (SPG) have also been taken into consideration:

- Affordable Housing (October 2018);
- Biodiversity and Geodiversity (October 2018); and
- Landscape (April 2019).

## 5.0 PRE-APPLICATION / LPA RESPONSE

5.1 A Pre-Application Enquiry was submitted in May 2019 (ref. 19/0057/PRE) which sought feedback on the possibility of a *"Detached utility building to service campsite and provision of managers rural enterprise dwelling"* at the enterprise – see Appendix A for full details.

5.2 The key information of relevance to this application from this Pre-App Response will be the commentary relating to the 'Managers Rural Enterprise Dwelling'. As such, the following principal subheadings in relation to this are summarised below:

### TAN 6

5.3 The Pre-App Response outlines from the outset that Paragraph 4.3.2 of Technical Advice Note 6 states *"rural enterprises comprise land related businesses including ... tourism and leisure enterprises"*. Given this, the response states that *"In light of the above definition of what constitutes a rural enterprise, it is considered the site is applicable"*.

5.4 Furthermore, the response highlights that *"TAN 6 states that one of the few circumstances where residential development in the open countryside may be justified is when accommodation is required to enable rural enterprise workers to live at, or close to, their place of work. This includes tourism and leisure enterprises such as 68 Degrees West Glamping"*.

5.5 The response did however outline that *"the proposed development would need to meet the functional test, time test, financial test and other dwelling test as set out in Technical Advice Note 6 in order for the principle of development for a rural enterprise dwelling to be established"*. Given this, *"In the event of a full application being submitted, detailed evidence should be submitted"*. The detailed evidence considered necessary and requested included the following:

- Demonstrate *"the functional requirement for the need for 24 hour availability of a senior staff member within the grounds of the site"*.
- That *"accounts are submitted for the business which demonstrates the business is financially sound and clear evidence is submitted which details how the enterprise has been planned on a sound financial basis. This should demonstrate that the business is currently profitable and has clear prospects of remaining economically sustainable for at least 5 years"*.
- *"Details of other properties in the surrounding area that have been considered are submitted and why these are not acceptable to fulfil the functional need of the enterprise"*.

5.6 A Rural Enterprise Dwelling Appraisal has therefore been produced by 'Reading Agricultural Consultants' and is submitted alongside, and in support of, this application. This provides robust evidence highlighting how the above tests (the functional test, time test, financial test and other dwelling test) are satisfied.

5.7 The pre-application enquiry response concluded (in respect to this aspect i.e. TAN 6) that:

***"In light of the above, subject to the above tests set out in TAN 6 being satisfied, it is considered that the principle of development for a managers rural enterprise dwelling at this location is fundamentally acceptable"***.

### Scale

- 5.8 It is highlighted in the response that *"the size of the proposed dwelling should be related to the ability of the enterprise to fund and sustain a dwelling"*. Accordingly, the scale and size of the proposed dwelling has been designed to be modest, and proportionally sized to qualify as a rural enterprise dwelling. This is addressed below, and in the Rural Enterprise Dwelling Appraisal.

### Design

- 5.9 In regard to the design *"development proposals will only be permitted where it has been designed to complement and/or enhance the character of the surrounding area in terms of siting, appearance, integration, scale, height, massing and design detailing"*.
- 5.10 It was however considered and reported in the pre-application response that the proposed locations identified at the time (one of which is where the unit is now formally sited and proposed) were *"considered to be a sufficient distance from the glamping and caravan areas and would not cause an unacceptable impact upon the surrounding landscape"*. Equally, the proposed dwelling is positioned sufficiently close to the enterprise to enable functioning closely with it.

### Ecology / Biodiversity

- 5.11 The response outlined that *"full details of the potential impacts and proposed mitigation in relation to Great Crested Newts"*, and a *"preliminary ecological appraisal (needs) to be undertaken to identify the habitats present on and adjacent to the site and potential to support protected species as well as the presence of invasive non-native species"*.
- 5.12 Accordingly, a Preliminary Ecological Appraisal (prepared by europaeus land management services) addresses these comments and is submitted as part of this application.
- 5.13 It was also mentioned that *"Careful consideration will need to be given to any external lighting design provided through the proposed development"*, however that *"In principle, the lighting proposed appears to be acceptable and appropriate"*.

### Conclusion

- 5.14 The Pre-App Response concludes by stating that overall ***"the principle of development is considered to fundamentally comply with relevant planning policies"***.

## 6.0 MATERIAL CONSIDERATIONS

6.1 This section provides a detailed examination and analysis of the main planning considerations raised by the proposed development. The key planning considerations are considered to be:

- The Principle of Development & TAN 6 Tests;
- Design and Residential Amenity;
- Access & Highways;
- Ecology; and
- Other Material Considerations.

### The Principle of Development & TAN 6 Tests

6.2 As outlined in the Pre-App Response (ref. 19/0057/PRE) it was considered that *"the principle of development for a managers rural enterprise dwelling at this location is fundamentally acceptable"*, and that *"the principle of development is considered to fundamentally comply with relevant planning policies"*.

6.3 That said, this was *"subject to the tests set out in TAN 6 being satisfied"* - *"the proposed development would need to meet the functional test, time test, financial test and other dwelling test as set out in Technical Advice Note 6 in order for the principle of development for a rural enterprise dwelling to be established"*.

6.4 Given this, provided this application highlights that the above tests are/have been satisfied, *"the principle of development for a managers rural enterprise dwelling at this location is fundamentally acceptable"*.

6.5 It should be noted that an outline application (ref. 19/1590/OUT) was submitted in September 2019 (post the Pre-Application mentioned above) which proposed/sought to gain permission for a *"detached utility building ... and rural enterprise dwelling"*. The rural enterprise dwelling aspect of this was however later removed from the proposal. This was due to the following concerns and reasons expressed at that time (see Appendix B & C – 2019 Outline Application ref. 19/1590/OUT Email Dialogue):

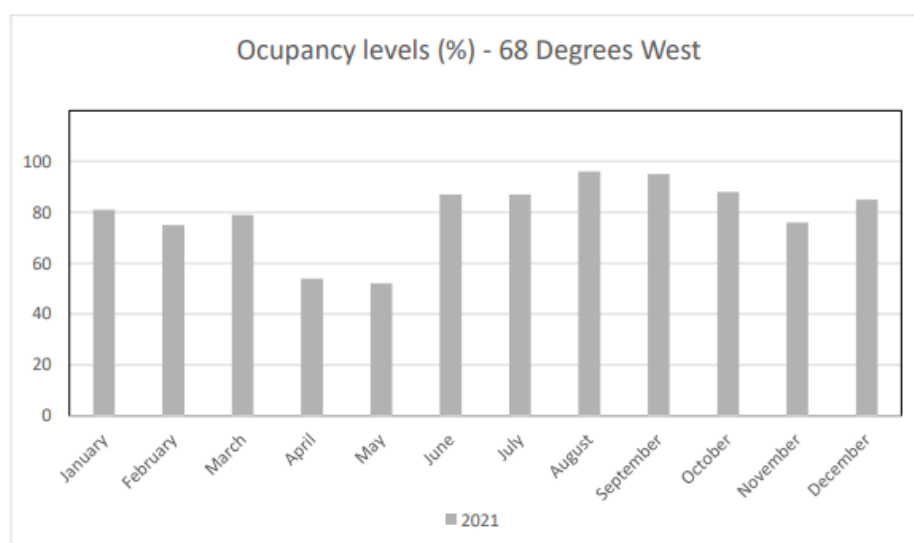
- *"We have concerns about the application as it stands and it is likely I will be recommending refusal as we have **concerns about the application not being able to meet the functionality and time tests as it stands at the moment.** Insufficient information has been submitted to demonstrate the viability and current financial circumstances of the enterprise."*
- *"The LPA does not dispute the success or level of investment at the site **but considers that a rural enterprise dwelling is premature at this time** given there are only five units currently on site. The LPA must guard against the possibility that a dwelling could be given consent and after it being built the business may cease trading leading to inappropriate development in the open countryside. The LPA must also be assured that the business can support the labour associated with the business and the proposed project."*
- *"Nevertheless, in this instance I advise you don't proceed with carrying out additional surveys at this time **as we still consider that a dwelling cannot yet be justified on this site.**"*

6.6 As can be noted, the concerns expressed at the time were associated with the considered prematurity of the application at that time, as opposed to any outright or fundamental objection (indeed the likelihood of a/the case being made for a proposal of this kind was accepted and reported in the pre-application response).

- 6.7 The position since this feedback has significantly changed, with there being another four years' worth of growth and investment into the site and enterprise. As such, the position has positively progressed, and all concerns regarding the premature nature, and lack of justification for the dwelling, have since been overcome, with the dwelling therefore now being unequivocally acceptable.
- 6.8 The Rural Enterprise Dwelling Appraisal produced by 'Reading Agricultural Consultants' provides robust evidence (which wasn't supplied in application ref. 19/1590/OUT) as to how and why these tests are satisfied, as well as how the position has positively expanded/progressed in these additional 4 years since this initial commentary. This should be read in full and in conjunction with this statement to fully appreciate and understand the position.
- 6.9 The following key points have been extracted from this appraisal to outline that these tests are satisfied, and all concerns regarding the premature nature, and justification for the dwelling, have since been overcome.

#### Functional Need

- 6.10 There is an essential need for an on-site manager due to high year-round occupancy rates (which are higher than 'Visit Wales' average monthly occupancy percentage) at the enterprise and site.



- 6.11 The applicant's/owners need to be near to the site to serve these individual's needs and respond to issues (whether these be life threatening or business threatening). The manager is after all the first point of call for all issues relating to the site. Responding quickly ensures that their business is safeguarded, and a good level of service is maintained which is represented in their (good) reviews (which in turn encourages more business).
- 6.12 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 if the applicant's live off-site. There have been incidents which have necessitated the applicant's attending the site out-of-hours on many occasions (as expressed in the section 5.10 of the Rural Enterprise Dwelling Appraisal). If there was a medical emergency or life-threatening situation then the delay in arriving on the site could have serious implications. There therefore needs to be a worker readily available at all times. It is unreasonable to expect the applicants to travel back and forth from a distant,

off-site location to attend to these issues and emergencies. Living off-site is therefore no longer an option. The enterprise cannot therefore continue to operate on this basis.

- 6.13 This is specially given as an example which satisfies the functional test, and need for a dwelling – *"Such requirements might arise, for example, if workers are needed to be on hand night and day to deal with an emergency that would threaten the continued viability and existence of the enterprise without immediate attention"*.
- 6.14 It would therefore be inappropriate to house a key worker off-site, out of close contact with the current guest, and future increasing number of guests. This is evidenced and supported in Rural Enterprise Dwelling Appraisal via the outcome of appeal ref APP/Y2620/A/01/1081059.
- 6.15 Furthermore, living off-site is now actively restricting the enterprise's growth, as it is resulting in the applicant's postponing the plans to increase the number of accommodation units. The enterprise has permission for another 13 pods which they are looking to build given the success to date (see Financial Test / accounts), but are finding it difficult to service the existing ones remotely. They are cautious to site these however for fear that the site reviews will be unfavourable if they cannot provide the same level of service, respond to everyone's needs from afar, or if they take time doing so as a result of travelling to site, resulting in a decline in visitors.
- 6.16 The lack of a dwelling at site is therefore now actively negatively impacting the creativity and economic vitality of this rural enterprise. This is discouraged by/in TAN6. Section 3 (Sustainable Rural Economies) of TAN 6 notes how *"strong rural economies are essential to support sustainable and vibrant rural communities. A strong rural economy can also help to promote social inclusion and provide the financial resources necessary to support local services and maintain attractive and diverse natural environments and landscapes"*.
- 6.17 This section adds further how *"planning authorities should support the diversification of the rural economy as a way to provide local employment opportunities, increase local economic prosperity and minimise the need to travel for employment"*. TAN 6 ultimately states that Local Planning Authorities *"should include supporting the expansion of businesses that are currently located in the open countryside"*.

#### Time Test (Labour Requirements)

- 6.18 As there is no standard data for tourism-based enterprises, or indeed anything similar in the accommodation sector, labour requirements have therefore been calculated by means of Standard Man Days (SMD) - where one SMD equates to 8 labour hours a day. Given this, the business currently requires 1.3 full-time workers (see overleaf):

Activity	Hrs / week
Stripping & washing sheets & linen, ironing	10
General cleaning – toilets & shower block	7
Room cleansing between lets	10
Hot tub chemical checks (twice daily)	7
Hot tub – draining, cleaning & maintenance	7
General maintenance and repairs, grass cutting	3
Guest check-in	2
Booking, website & admin	5
<b>Sub-total</b>	<b>51</b>
Hrs/wk for standard worker	39
<b>Total Labour Requirement</b>	<b>1.3</b>

- 6.19 The above data clearly highlights how the proposed dwelling would therefore cater for, and be occupied by, a full-time worker. As such, the labour test is met.
- 6.20 Notwithstanding this, the lack of dwelling on site and living off-site is now actively restricting the enterprises' growth. Given that the enterprise and site has permission for a further 13 pods (which the applicants are wanting to implement), the applicants are having to postpone plans to increase the number of accommodation units - as the labour requirements will increase when the pods/site/enterprise increases. Given that the site/enterprise is already operating over the threshold of hours required for a full-time worker at site, and they are currently finding it difficult to service the existing elements at the enterprise remotely, expanding and implementing their permission for a further 13 pods at this time, and without a dwelling at site, is not wise (due to the reasons expressed in the 'Functional Test' section above).
- 6.21 It would of course be the case that any increase in the number of pods would increase the labour demand/requirement yet further – strengthening the “already made” case and justification further.

Financial Test (Financial Soundness)

- 6.22 Paragraph 4.4.1(c) of TAN 6 is divided into four parts and states that the unit and the activity concerned should:
- i) have been established for at least three years;*
  - ii) have been profitable for at least one of them;*
  - iii) be currently financially sound; and*
  - iv) have a clear prospect of remaining so.*
- 6.23 Taking each criterion in turn, and as outlined in the Rural Enterprise Dwelling Appraisal, the following outlines how the enterprise and site satisfy these criterion, and ultimately the Financial Test:
- i) have been established for at least three years;*
- The site and enterprise have been operating since 2018. The site and enterprise have therefore been established for 5 years (2 years more than required).
- ii) have been profitable for at least one of them;*



The copies of the trading accounts for the enterprise show that the enterprise has been constantly profitable year on year for each of the last 3 years. This is a far superior financial position to be in than just one of these past 4 trading years being profitable.

*iii) be currently financially sound; and*

The copies of the trading accounts for the enterprise show that the enterprise has been constantly profitable year on year for each of the last 3 years and has increased its net worth in this time. This indicates the enterprise is currently financially sound.

*iv) have a clear prospect of remaining so.*

Given that the enterprise has been constantly profitable year on year for each of the last 3 years and occupancy rates remain constantly high (surpassing 'Visit Wales' average monthly occupancy percentage), it indicates that the business will continue to remain operational and generate a healthy profit into the future. Furthermore, the Applicants have recently secured the 2019 outline permission (for the utility building) via a Reserved Matters application (ref. 22/2196/RES). This provides proof of the intention for continued investment in the site. Furthermore, as the utility building has now been secured, it allows them to invest further in the site and make it a more attractive venue to visitors, thereby increasing bookings and income.

6.24 The enterprise therefore clearly satisfies each and all of the fundamental criterion of the Financial Test.

6.25 A further aspect of the financial test is that this is "*also necessary to assess the size of dwelling which the enterprise can afford to build and maintain ... It is the requirements of the enterprise rather than of the owner or occupier which are relevant to determining the size of dwelling that is appropriate*" (TAN 6 paragraph 4.10.2). In essence, this means that businesses which generate higher profits can afford to construct more expensive/larger dwellings. It can be noted from reviewing the business accounts that the applicants' business is a highly profitable one, and the profit levels shown in the business demonstrate that the business has the ability to fund its construction. The proposed dwelling is easily affordable to the business accordingly.

#### Other Dwelling Test (Suitability and availability of other accommodation)

6.26 As the Rural Enterprise Dwelling Appraisal outlines, there are no other forms of accommodation or dwellings in the vicinity that are suitable and/or available as an alternative to the proposed dwelling at site:

- The rental property they occupy will no longer be available to rent/occupy as they have been asked to vacate the rented accommodation (as it is required for a farmworker).
- There are no barns or stone buildings on the applicant's land which are capable of conversion.
- The nearest dwelling to the site and enterprise is priced at £750,000 which is clearly unaffordable to a rural enterprise worker.
- The other available properties were flats and these presented their own issues e.g. a £5,000 annual service charge, and the impracticality of/for holidaymakers to search out the Applicants in a group of flats in the event of an incident.

6.27 Notwithstanding the individual issues arising from each (as mentioned above), the distance of each potential dwelling from the site is inappropriate and therefore not acceptable - it would be inappropriate to house a key worker off-site, out of close contact with increasing numbers



of guests (as evidenced previously above, and in Rural Enterprise Dwelling Appraisal, e.g. appeal ref APP/Y2620/A/01/1081059).

#### Interim Summary

- 6.28 The above and Rural Enterprise Dwelling Appraisal clearly therefore highlights how the proposal satisfies all the tests, and as such the proposal is acceptable in principle and in detail.
- 6.29 The functional test is satisfied as there is a clear functional need for a worker to be readily available at all times due to the high occupancy rates, and in order to deal with an emergency that would threaten the continued viability and existence of the enterprise without immediate attention.
- 6.30 The time test is satisfied as, using the Standard Man Days (SMD) calculation, the business currently requires 1.3 full-time workers. The labour requirements will only increase when the 13 further pods are built.
- 6.31 The financial test is satisfied as: the enterprise has been established for 5 years (2 more than required); the enterprise has been constantly profitable year on year for each of the last 3 years (not just for one year at anyone time); and given that the enterprise has been constantly profitable year on year for each of the last 3 years with occupancy rates remaining constantly high, it is assumed that the business will continue to remain operational and generate a healthy profit into the future.
- 6.32 The other dwelling test is satisfied as there are no other forms of accommodation or dwellings in the vicinity that are suitable and/or available as an alternative to the proposed dwelling at site.
- 6.33 As previously outlined the rural enterprise dwelling aspect of the outline application in 2019 (ref. 19/1590/OUT) was removed as there were *"concerns ... as it stands at the moment"* that a rural enterprise dwelling was *"premature at this time"*, and that a *"dwelling cannot yet be justified on this site"* (e.g. *"the business may cease trading"*). Since 2019 however the business has not ceased trading, in fact there has been another four years' worth of growth and investment into the site. For example:
- The enterprise has been profitable year on year for each of the last 3 years;
  - Occupancy rates have remained high year-round;
  - The number of pods at site has increased;
  - The enterprise has increased its net worth;
  - A 14kw solar energy system has been installed; and
  - The applicants have instructed Planning Consultants to secure the 2019 outline application permission (via a Reserved Matters) – which allows them to invest further in the site and make it a more attractive venue to visitors, thereby increasing bookings and income.
- 6.34 As such, all concerns regarding the premature nature, and perceived lack of justification for the dwelling in 2019, have since been overcome. The dwelling is therefore now unequivocally acceptable.
- 6.35 Over and above the above, the lack of a dwelling at site is now actively negatively impacting the creativity and economic vitality of this rural enterprise (i.e. expansion and growth). This is discouraged by/in TAN6, specifically Section 3 (Sustainable Rural Economies) which notes how 'strong rural economies are essential to support sustainable and vibrant rural communities. A strong rural economy can also help to promote social inclusion and provide the financial resources necessary to support local services and maintain attractive and diverse natural

environments and landscapes'. This section adds further how 'planning authorities should support the diversification of the rural economy as a way to provide local employment opportunities, increase local economic prosperity and minimise the need to travel for employment'. TAN 6 ultimately states that Local Planning Authorities 'should include supporting the expansion of businesses that are currently located in the open countryside'. Approval of the proposal would accordingly be in accord with these rural enterprise objectives.

### Design and Residential Amenity

- 6.36 As outlined in the Pre-Application response (ref. 19/0057/PRE), with respect to design, specific reference needs to be made to LDP policy DM13 – Design and Resources. The following criteria of Policy DM13 is therefore of relevance:
1. *"Development has been designed to complement and/or enhance the character of the surrounding area in terms of siting, appearance, integration, scale, height, massing, and design detailing"; and*
  2. *"The development contributes towards the preservation of local distinctiveness and sense of place."*
- 6.37 It is evident that the proposals comply with the above criterion as the proposed works are of a high standard of design, and have been carefully and sensitively designed and located. The proposed dwelling adopts a relatively simplistic design, with a gabled roof, which noting the site's rural location (and stated in the Officer's Report of app ref. 22/0314/FUL – see Appendix D) is deemed to be the best option. Furthermore, the dwelling will be timber clad with some stone render under a slate roof. This is considerate to the existing built form, reflecting the design of the existing shower/toilet building (app ref. P/2017/0584) currently on site, and the recently approved detached utility building (app ref. 19/1590/OUT & 22/2196/RES). Given that the design of the proposed dwelling seeks to reflect and replicate the design and character of the two recently approved applications at site, the proposal is considered to be acceptable in this regard, and compliant with planning policy.
- 6.38 It is considered that the scale of the dwelling would be in-keeping with the site's immediate vicinity. The recently approved detached utility building (app ref. 19/1590/OUT & 22/2196/RES) is, as mentioned in the Officer's Report of application ref. 19/1590/OUT, *"relatively large"* (see Appendix E). The approved Utility Building is a two-storey building and will measure 3.9m to the eaves and 7.9m to the ridge of a double pitch roof, and is approximately 12.6m long and 10.4m wide. Given that the application site is located within close proximity to the existing built form of the Glamping Pods, Shower/Toilet Block, the proposed dwelling reads against the backdrop of this built development from within the surrounding landscape. This will further be the case once the *"relatively large"* Utility Building has been built out. The proposed dwelling will therefore not be prominent on/at the site, and will be in-keeping with the scale and *"local distinctiveness and sense of place"* of/at the site. This will especially be the case given that (as mentioned above) the dwelling looks to replicate the approved materials/design qualities of the approved Utility Building.
- 6.39 It is acknowledged that the proposed dwelling house would be larger (195sqm) than the Local Authority's affordable housing policy and guidance which restricts the floor space of proposed affordable homes to a maximum of 115 square metres (as stated in 2019 Pre-App Response – *"The size of the dwelling should reflect the needs of the enterprise but with the extension of potential occupancy to those eligible for affordable housing, there should also be regard to this consideration. The Local Authority's affordable housing policy and guidance restricts the floor space of proposed affordable homes to a maximum of 115 square metres in order to ensure they are affordable in nature and perpetuity"*).

- 6.40 First and foremost however, and as recognised and stated by the LPA, *"The size of the dwelling should reflect the needs of the enterprise"*. The design of the dwelling provides only the basic needs of any rural enterprise dwelling - an open plan kitchen/diner/living room; office; ground floor shower/WC; a utility room and three bedrooms.
- 6.41 Furthermore, an aspect of the financial test is that it is *"necessary to assess the size of dwelling which the enterprise can afford to build and maintain ... It is the requirements of the enterprise rather than of the owner or occupier which are relevant to determining the size of dwelling that is appropriate"* (TAN 6 paragraph 4.10.2). In essence, this means that businesses which generate higher profits can afford to construct more expensive/larger dwellings. There are of course no TAN 6 policy guidelines on dwelling size, principally because the size is determined by the profitability and functional need – which is different for every business. This was reiterated in the 2019 Pre-App Response (ref. 19/0057/PRE) – *"Welsh Government guidance advises that the size of the proposed dwelling should be related to the ability of the enterprise to fund and sustain a dwelling"*. The profit levels shown in the business accounts demonstrate that the proposed dwelling is easily affordable to the business.
- 6.42 Notwithstanding the above, dwellings larger than 115sqm have previously been accepted by Powys CC for previous rural enterprise dwellings (as sated in the Officer's Report of app ref. 22/0314/FUL – see Appendix D).
- 6.43 Given the above, despite the proposed dwelling being larger than the Local Authority's affordable housing policy and guidance of 115sqm, it is wholly policy compliant with Welsh Government policy (TAN 6), and has been found to be acceptable by the authority for other rural enterprise dwellings. The scale of the dwelling is therefore acceptable.
- 6.44 The proposed detached garage would be located to the side of the dwelling house. This layout is considered to be relatively commonplace for developments of this nature, and noting its single-storey height and overall scale, it is considered that this is acceptable. It too would utilise a basic design and be constructed of the same materials. It is therefore considered to be in-keeping with the character of the proposed dwelling house, the existing shower/toilet building (app ref. P/2017/0584) currently on site, and the recently approved detached utility building (app ref. 22/2196/RES).
- 6.45 Furthermore, a new perimeter hedgerow and soft landscaping is proposed around the site which will help to assimilate the development into its setting, and screen the development so that it would not be visible.
- 6.46 It is therefore considered that the proposed development fundamentally complies with relevant planning policy with regards to design, location, integration, scale and setting.
- 6.47 In considering the impact upon privacy levels and amenities enjoyed by occupiers of neighbouring properties, consideration has been given to the adopted Residential Design SPG and LDP Policy DM13 (Criterion 11). The neighbouring dwellings at Pentwyn Farm is located approximately 322m to the north-east of the application site. As such, it is considered there is no potential for any overbearing, overshadowing or overlooking impacts to arise from the development of a new dwelling house on the site.

### **Access & Highways**

- 6.48 Criterion 10 of LDP Policy DM13 states that development proposals should meet all highway access requirements (for transport users) and parking standards. This is reinforced by Policy T1 (Travel, Traffic and Transport Infrastructure) of the Powys LDP, which refers to the transport network implications of development, and the importance of highway safety in all development proposals.

- 6.49 The development would be accessed via a new vehicular access created directly off an existing unnamed road/track which serves the existing and operating enterprise/glamping site, and Pentwyn Farm to the north-east. On-site, the dwelling would be served by a detached garage and exterior parking and turning areas.
- 6.50 The new access ensures that highway safety for all transport users is not detrimentally impacted upon due to the following reasons. Firstly, the new access has the correct visibility splays, and the nature of the road/track ensures straight uninterrupted views. Secondly, the unnamed road/track has low traffic movements (only serving the enterprise/glamping site and Pentwyn Farm to the north-east), and so the risk from potential conflicts on this road is low. Thirdly, the number of trips/traffic movements will be reduced as the applicants will no longer have to use the road to travel to and from the site – as they will, if the application is approved, reside on site. As such, the impacts of the development will not adversely affect the safe and efficient flow of traffic on the network, indeed will reduce this (which in itself will be a sustainability gain).
- 6.51 Furthermore, given that the Highways department have chosen not to comment on, and have not objected to, the previous applications at the site/enterprise, it is considered that the Highways position and arrangement is suitable.
- 6.52 In the light of the above it is therefore considered that the proposed development fundamentally complies with policies DM13 and T1.

### Ecology

- 6.53 The 2019 Pre-App Response outlined that a Preliminary Ecological Appraisal was needed, and that this must include an assessment of the impacts on Great Crested Newts. This has subsequently been undertaken by 'europaeus land management services'.
- 6.54 The executive summary of the report states that *"No identifiable signs of, or potential for, a great crested newt presence were observed at the site surveyed and the location is deemed unsuitable for any use by the species"*.
- 6.55 It concludes *"that there is a negligible possibility of encountering locally valued and / or protected species (such as breeding birds in due season, herptiles etc), and a low to moderate potential to encounter others (such as small mammals) visiting the site, and although mobile species could utilise parts of the site at certain times, such as hedgehogs, badgers etc, a precautionary approach to the works is deemed a suitable way to address any risk. A precautionary approach to work is therefore recommended and particularly for great crested newts"*(see paragraphs 4.3 and 4.4).
- 6.56 The Survey Results (see Section 3) specifically find that:
- Habitats & features - *"There are no trees or hedges within the fenced survey plot"*.
  - Protected species – *"No signs of badger use were evident around the site, nor any signs of other protected species use or occupation of the site, although there appears to be scope for a range of small and medium sized mammals, breeding birds and invertebrates to at least visit for transit and foraging"*.
  - Great crested newts and others – *"By these means no evidence of any current crested newt usage or occupation was located. No current herptile presence or activity has been identified at the site and no potentially suitable features for bat roosting were identified within the site, other than a small number of high-level tree features outside the boundary and some way distant, though none identified for removal or reduction"*.

- 6.57 Given the above, the development is therefore of no impact, and accordingly acceptable in ecological terms.

### **Other Material Considerations**

#### *Drainage*

- 6.58 In line with Schedule 3 of the Flood and Water Management Act (FWMA) 2010, all new developments with a construction area over 100m<sup>2</sup> will need to manage surface water using Sustainable Drainage Systems (SuDs). All surface water drainage systems will need to comply with mandatory National Standards for sustainable drainage (SuDs) and be approved by the new SuDS Approval Body (SAB).
- 6.59 With regards to drainage, it is proposed that soakaways will be utilised, and the applicant is therefore advancing a separate SuDS application which will run in tandem with the planning proposals – in line with planning policies which encourages the use of sustainable drainage systems when possible and appropriate.
- 6.60 It should be noted that 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). The dwelling would look to connect to this and would marginally increase the capacity of this by 2. The treatment plant would still have capacity for another 26 people over and above, and notwithstanding, the existing use, and the resultant increase associated with this proposal. The signed permit from NRW is submitted to inform the position (see Appendix F). The location has been extracted and is shown overleaf for ease.
- 6.61 Ultimately, the site will not have an adverse impact on the phosphate status of the watercourses feeding the SAC, as it is located well in excess of 40m from any surface water feature and over 50m from a SAC boundary, and as the proposed dwelling would result in phosphate neutrality.

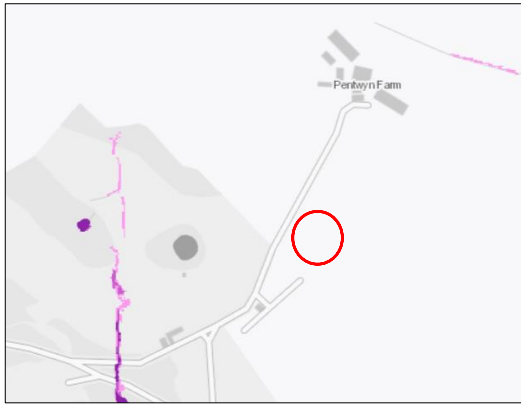
### Schedule 7 - Site plan



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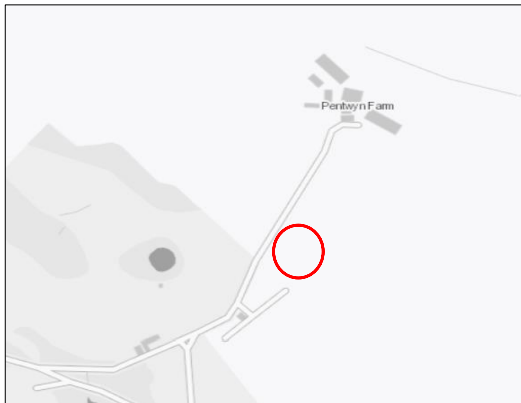
#### *Flood Risk*

6.62 As per Natural Resource Wales's Flood Maps for Planning below, the site is at no risk of flooding from rivers, sea or surface water. It is therefore considered to be within Flood Zone A (see extracts overleaf).



Flood Risk from Surface Water & Small Watercourses - Extent	
	High
	Medium
	Low

NRW Flood Risk Assessment Map (approx. site location in red)



Development Advice Map	
	Zone C1
	Zone C2
	Zone B
	Zone A

NRW Development Advice Map (approx. site location in red)

#### Historic Environment / Heritage

6.63 As per Historic Wales's mapping, there are no historical assets contained within the area of the site, and none in proximity that will be impacted by the proposal.



Historic Wales Map extract



### Trees

- 6.64 There are no trees contained within or adjacent to the site. This is confirmed by the PEA - "There are no trees or hedges within the fenced survey plot". No trees would therefore be impacted upon due to the proposal.

### Rights of Way

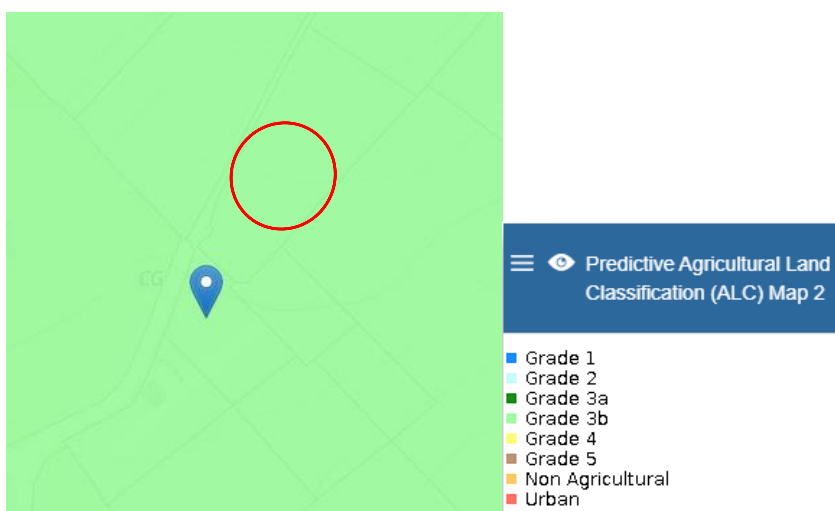
- 6.65 A Footpath (route 032/5/1) runs adjacent to the site (along the single track road). Notwithstanding this, the proposals will not affect this.



Powys PRoW Map (approx. site location in red)

### Agricultural Land Classification

- 6.66 A review of the Agricultural Land Classification Predictive Map indicates that the site lies within 'Grade 3b: moderate quality agricultural land'. Only land classified/graded as 3a and above is protected and would require survey work to be undertaken and submitted – "Where the Predictive Agricultural Land Classification Map identifies grades 1, 2 or 3a, a survey will be required to determine Grades present and in what proportion". Given this no survey is required.
- 6.67 Over and above this, given that the site is relatively small, it is not considered that its development for the proposed development would result in a detrimental or significant loss of agricultural land.



Lle Data Map Wales – Agricultural Land Classification Map (Showing Approximate Site Location in red)



## 7.0 SUMMARY AND CONCLUSIONS

7.1 The application seeks permission for the proposed:

*'CONSTRUCTION OF A RURAL ENTERPRISE DWELLING & ASSOCIATED ACCESS'*

7.2 Having regard to the above, and in summary, it is considered that the proposed development is considered acceptable and appropriate, in light of the following key factors:

- The proposals for a rural enterprise dwelling fully comply with all the tests outlined in TAN 6 demonstrating an evident need for a dwelling at 68 Degrees West Glamping;
- The proposal represents a sustainable way of ensuring the ongoing success of 68 Degrees West, supporting the growth and safeguarding of the rural economy, thus supporting the aspirations of National and Local Planning Policy.
- The proposals are for a modest dwelling, and the requirement for a dwelling of this size, form and scale is wholly reasonable and justified relative to, and given the profits generated by, the enterprise;
- The detailed design of the proposals represents a high-quality development that is sensitive in form, scale and mass, reflecting and in-keeping with its existing context i.e. the existing and approved buildings at site;
- The new access uses an existing and established route, and is acceptable from a highways perspective having no unacceptable impact on highway safety, nor cause or exacerbate existing traffic congestion (indeed will reduce flows);
- The proposed dwelling will not have an unacceptable impact in ecological terms, especially in relation to Great Crested Newts;
- The proposed dwelling will not have an unacceptable impact upon the residential amenity of properties in the local area; and
- The proposal has no unacceptable impact in terms of Flood Risk, Trees, Historic Environment, and Public Rights of Way.

7.3 Given the above, it is considered that the proposed development represents an appropriate and policy compliant scheme.

7.4 Accordingly, it is therefore considered that the proposed development is acceptable, and we would respectfully request that the application be approved.