

# PLANNING STATEMENT

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**Tirlan Farm**

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September 2021



## Summary

**Proposal:**

Proposed alterations to existing outbuilding to facilitate conversion to holiday accommodation.

**Location:**

Tirlan Farm, Cilfrew, Neath,

**Date:**

September, 2021

**Project Reference:**

S21.248

**Client:**

Catrin Stephens

**Product of:**

Asbri Planning Limited  
Unit 9 Oak Tree Court  
Mulberry Drive  
Cardiff Gate Business Park  
Cardiff CF23 8RS

**Prepared by:**

Nia Jardine –Planner

**Approved by:**

Richard Bowen – Director

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## Introduction

- 1.1 This Planning Statement has been prepared on behalf of Catrin Stephens to accompany a planning application for the proposed conversion and adaptation of an outbuilding to holiday accommodation at Tirlan Farm, Cilfrew, Neath.
- 1.2 The purpose of this Planning Statement is to provide a clear and logical document to outline the planning considerations and planning policies relevant to the proposal. The document also acts as a method of demonstrating the details of the planning application in a way that can be read both by professionals and the public.
- 1.3 This Planning Statement acts as a supporting document for the accompanying planning application and should be read in conjunction with all other elements of the application which include the following documents

| Drawing name                        | Drawing reference |
|-------------------------------------|-------------------|
| Site Location Plan and Block Plan   | 04                |
| Proposed Site Plan                  | 03                |
| Existing Floor Plans and Elevations | 01                |
| Proposed Floor Plans and Elevations | 02                |
| Proposed Site Plan and Highways     | 05                |
| Proposed Site Plan and Highways     | 06                |
| Topographic Survey                  | 1137              |

- 1.4 In addition, the following supporting documents are submitted.

| Document                                    | Prepared by        |
|---------------------------------------------|--------------------|
| Planning application forms (1APP)           | Asbri Planning     |
| Planning Statement                          | Asbri Planning     |
| Ecological Report                           | Hawkeswood Ecology |
| Structural Survey                           | MW Consult Ltd     |
| Tourism Needs Development Impact Assessment | Asbri Planning     |

- 1.5 In terms of the content of the Planning Statement, this chapter is followed by a brief description of the site and its features which includes a contextual analysis regarding the local character and surrounding land uses. Subsequently, Chapter 3 provides an outline of the proposed development, followed by an outline of the pre-application advice received in Chapter 4. Following this, Chapter 5 provides a summary of the supporting documents included within the application package. Chapter 6 then identifies the relevant national and local planning policies which provide the framework for appraising

the proposed development. Meanwhile, Chapter 7 draws together the key points and conclusions from the supporting technical documents to demonstrate the overall appropriateness of the proposal in planning terms. Finally, Chapter 8 concludes why the proposal should be granted planning permission.

## Site description

### General Location

- 2.1 Tirlan Farm consists of a two-storey dwelling (farmhouse) with detached stable building (former miners cottages) located in an isolated position due north of the settlement of Cilfrew in Neath Port Talbot. Access to the site is via an agricultural single lane track from the public highway (Oak View) to the east.

### The Site

- 2.2 The stables, a one storey property, have been the subject to alteration and rebuilding in the past and consist of a stone, block structure with a modern metal sheet roof as shown on the following photographs. The building measures approximately 132m<sup>2</sup>.



- 2.3 The site is subject to an extensive history as it is thought to have been built in around 1830-1840 by Henry Williams; a mason. Henry Williams had come to Cilfrew to build cottages for mineworkers working in the small mines on March Hywel mountain.
- 2.4 The 1841 census shows Henry Williams living in the farmhouse with his family and also 5 servants in one or more separate dwellings at Tirlan which is believe to be the cottages (now the stable building). Please see historic photograph below.
- 2.5 In 1863 Evan Evans (later a partner in Evans Bevan collieries) expanded the small mining enterprise in Torcefn (near the application site) and March Hywel. A dram road was constructed across the mountain to link the mines on the mountain to a railway further down in the village. In addition, further down in the village from 1878 onwards there was Cilfrew Tinworks and the coal from the small mines was used to heat the furnaces at the works. A document dated 1873 from the Torcefn register of employees lists two miners living in Tirlan cottages.
- 2.6 The 1871 census list 4 cottages at Tirlan listing miners and their families and one Ostler and family living there. The building was built as one or more dwellings from the outset, in the mid-19th century, only later did it become used as farm buildings. 'Tirlan farm' was purchased by the applicant's family in 1952 from the National Coal Board. The Estate comprised the farmhouse, some outbuildings used for livestock and storage of feeds and machinery etc. along with a row of three terraced miners' cottages located opposite the farmhouse.
- 2.7 By the 1900s the cottages were used mainly for agricultural purposes and became the storage barn ancillary to the running of the farm. The building has undergone various maintenance works over the years with the majority of the structure having been rebuilt, some with original stonework but the majority with new concrete blockwork with the old doorways and windows still visible in parts.
- 2.8 Below is an original photograph from the 1950s where the cottages can be clearly seen. The small outbuilding to the rear has since been demolished and a retaining wall constructed along the rear wall to form an access track to the rear fields



- 2.9 A review of the TAN:15 development advice maps, produced by NRW, identifies the site within Flood Zone A and as such is considered to be at little or no risk of fluvial or coastal/tidal flooding.
- 2.10 A review of the Cadw Historic Records shows that there are no listed buildings identified within or adjoining the site. There are also no scheduled ancient monuments identified within or surrounding the site.
- 2.11 In addition, no Public Rights of Ways (PRoW) are identified within the site boundary.

#### **Surroundings and Vernacular**

- 2.12 Surrounding the site on all sides are open agricultural fields. The site is remote in location, however Cilfrew is located to the south east of the site and provides local facilities, catering for the surrounding area. Local facilities include Secondary and Primary schools, supermarkets, a petrol station, post office and restaurants.

#### **Access and Parking**

- 2.13 The site is accessed via a private agricultural track which connects to Oak View Road.
- 2.14 The site comprises sufficient parking and movement area for vehicles within the courtyard of the site, to the east of the stables. Parking for existing farmhouse residents is separate and located to the rear of the farmhouse.

### **Planning History**

2.15 Neath Port Talbot County Borough Council's online planning archives identifies no planning applications relating directly to the stables building. One relevant planning application has been identified at the primary farmhouse:

- P2007/1363- Proposed alterations and extensions to property comprising front porch extension, single and 2 storey rear extensions and dormer roof extension – Approved March 2008

## Proposals

### **General**

- 3.1 This application seeks the conversion of the existing stables into holiday let accommodation. The intention is for the existing farm to diversify over time towards a rural enterprise focussing on the 'staycation' principle.
- 3.2 Following a recent change in family circumstances, the applicant is seeking to use the holiday accommodation to both improve her income and assist in her to continue to live in the family home which she grew up in. There is a great sentimental attachment to the property with her children hopefully being the fourth generation to own the property.

### **Proposed Conversion**

- 3.3 The stables have been sensitively designed so that all materials used in the conversion of the outbuildings will remain in keeping with the existing farmhouse and local context. In visual amenity terms, the overall scale and massing will not alter significantly as a result of the development and will be subordinate to the host dwelling. It is not considered to detract from the character and appearance of the host dwelling.
- 3.4 The proposal includes the conversion of the existing vacant Stables to create attractive holiday accommodation comprising 3 bedrooms. Existing openings are proposed to be utilised for the windows and doors.

### **Materials**

- 3.5 From a visual inspection the building it is clear that previous works have been done in the past to stabilise the building and it is structurally sound and capable of conversion without major structural works. The palette of materials proposed will be in keeping with the character of the existing building. Stone will be used for the walls, while a slate roof will also be implemented in places, ensuring that the character of the original building is respected. Timber openings are also proposed.
- 3.6 It is considered that the design of the proposal to create holiday accommodation will remain sympathetic to the character of the existing dwelling and the wider countryside.

### **Access and parking**

- 3.7 The proposal aims to use the existing private access serving the site, located to the south of the site. It provides a driveway which connects to Oak View Road, leading to Cilfrew and Neath. It is considered sufficient in size for vehicles and includes two proposed passing bays,

a pedestrian footpath and lighting. This is considered adequate due to the rural location of the site. Visibility splays at the main entrance are considered sufficient for the proposal.

- 3.8 Space for parking and turning exists within the courtyard of the site. Sufficient area for visitor parking is situated to the east of the stables, separately to the parking for existing farmhouse residents, which is located to the rear of the farmhouse. 3 spaces for parking are outlined on the Proposed Site Plan, supporting this application.
- 3.9 The site affords an opportunity to create a dedicated area of amenity space for the unit with associated outdoor facilities which are critical for the success of such business in terms of client expectations. The existing farmhouse is sited a sufficient distance away from the stables in order to allow private amenity for both the applicant and potential users of the holiday units.

## Pre-Application Advice

- 4.1 Pre-application advice was sought from Neath Port Talbot Council on 2<sup>nd</sup> December 2020 (ref: Q2020/0210). A response was received on the 03<sup>rd</sup> March 2021. The pre-application sought advice on the conversion and extension of the existing building into two self-contained holiday lets. Following the initial pre-application response, a number of design changes have been made to produce the submitted proposals, including the removal of the proposed extension. The following comments were received on the initial design.

### **Principle of Development**

- 4.2 In terms of principle of development, the LPA stated in principle, subject to the following matters being addressed, and subject to all other relevant policy within the development plan, the principle of the proposals appears to be acceptable.
- 4.3 It outlined that allowing development outside of settlement limits will provide scope for the tourism sector to grow and contribute to reinvigorating the valley communities. The proposal would be required to demonstrate that it is economically viable, will promote sustainable development and enhance economic growth in the tourism sector. It confirmed that the valley areas, with their rural setting, have the potential to continue to build on the growing tourism industry and can integrate rural diversification into tourism schemes. Evidence required to accompany applications may include business plans and local data, including information on existing and projected visitor numbers for the area and an assessment of the position of the proposed development within the current tourism market.

### **Design**

- 4.4 The response suggested that whilst some effort has gone into utilising existing openings it is considered that this could be improved, to retain the character of the existing building, especially to the end elevation. All materials should reflect the character of the building and its rural location, so details of all windows and doors, including the use of traditional materials were requested.
- 4.5 The originally proposed extension was also discussed, with the LPA stating it is not considered that the extension to the building is necessary or in keeping with the design of the building. The provision of a rear wing provides this building with a residential character and one that does not match that of the existing building, or similar traditional buildings in the area. Given these comments, the extension was removed from the scheme.

- 4.6 The scale of the accommodation was considered to be sufficient with the confines of the existing footprint, especially as there is no established use or need at this site at present. The response also recommended that the conversion of the building into a single larger unit, with no extension, would also be acceptable.
- 4.7 With sympathetic design changes, the response stated that there *is* scope for the use of the building as a holiday let unit. As such these considerations have been incorporated into the proposed scheme.

#### **Access and parking**

- 4.8 Within the pre-application response, the Local Highway Authority raised the following comments. These comments have been addressed and the scheme is now considered to be sufficient in regard to highway safety.
1. Due to the location and access it does not create or encourage active travel for safe pedestrian and cycle movements to and from the proposed holiday accommodations.
  2. The car parking is shown on the Proposed Site Plan 03 to have 3 no of car parking spaces. There should be one space per bedroom, therefore requiring 4 car parking spaces with a suitable turning area. Details are required for approval.
  3. Access lane to Tirlan Farm and the proposed Holiday Accommodation off Oak View Road is approximately 724 metres in length, varies in width with a substandard vertical and horizontal alignment, together with limited forward passing areas. In addition, Oak View Road has restricted access widths which vary in size and also has limited forward visibility splays.
  4. The existing access from Tirlan Farm on to Oak View is substandard in terms the following
    - o The existing access is predominantly used for agricultural purposes and is also for that single use. The additional use will have a significant effect on the access in regards to potential walkers, cyclists and car users.
    - o Gradients of access onto Oak View is steep and substandard in construction.
    - o The geometry of the access for vehicle movements limits vehicles wanting to turn left onto Oak View, and
    - o Visibility splays is well below standard requirements for the existing access on to Oak View. To the left whilst leaving Tirlan Farm the visibility is limited to a few meters only.
    - o There is currently no lighting along the private access road to Tirlan Farm, and neither is there any proposed. This is not a legal requirement, however I feel that walkers and cyclists may benefit from such lighting in terms of highway safety.

- 4.9 Following receipt of these comments, significant improvements have been made to the proposed scheme in regard to highway safety. Firstly, the access road has been improved by including proposed pedestrian pathways and lighting for those walking to the site. This is outlined on the Proposed Site and Highways Plan (05). The lighting will comprise bollard down style lighting.
- 4.10 In addition, extensive work has been recently completed on the entrance of the site to ensure safe entrance and sufficient visibility splays are provided. Visibility splays have now been improved considerably to standard and the access is considered safe for existing and future vehicles.
- 4.11 In regard to passing bays, the proposed site layout now includes two passing areas along the access road to ensure safe passing of vehicles. Notwithstanding, it is considered that the proposed traffic along this road will be minimal at any one time.

#### **Biodiversity**

- 4.12 In regard to biodiversity, the response states that the proposals will remove potential bird nesting/foraging habitats which must be mitigated for under the Habitat Regulations 2017. As recommended in the Preliminary Roost Assessment, Tirlan Cottage, Cilfrew (Hawkeswood Ecology, September 2020) roost provision for swallows should be provided. In addition, integral bat and bird boxes should be fitted to the building exterior. These are incorporated on the proposed site plan.

#### **Drainage**

- 4.13 The pre-application response states that SAB approval may be required for any widening of existing access and additional hard surfaced areas around the holiday accommodation. This will be required if collectively the works exceed 100sqm. Should the development not require a SAB approval then a suitable drainage strategy will be required to show how surface water is disposed of within the site, and to ensure that the discharge of surface water does not adversely affect adjoin land or land downstream.

#### **Requested Supporting Documents**

- 4.14 The pre-application response concluded by suggesting a number of supporting documents which may be required as part of the planning application submission. They include:
- Structural Survey
  - Tourism assessment

- Survey / Barn Owl Survey. Noting that these surveys may need to be redone if the applicants not forthcoming within a reasonable timescale.
- Tree Survey if any trees are located within or on the boundaries of the site.
- Site survey identifying existing ground levels, plus details of proposed levels including sections / cross-sections

## Supporting documents

- 5.1 The following section intends to provide a brief overview of the supporting documents and reports which have been prepared to accompany the planning application for the proposed development.

### **Structural Survey**

- 5.2 This application is supported by a Structural Survey, produced by MW Consult Ltd. It confirms that the property is free from any major defects and in good condition. The walls are considered suitable for retention, subject to minor remedial works. The concrete floor slab is also considered to be suitable for retention. The report provides numerous recommendations for remedial works to accommodate the proposed development.

### **Tourism Needs and Development Impact Assessment**

- 5.3 In accordance with Planning Policy SP13 and TO1 of the LDP, a Tourism, Needs and Development Impact Assessment (TNDIA) has been produced by Asbri Planning Ltd to support this application.
- 5.4 The TNDIA evidences why this development is needed; shows that the proposal is viable and sustainable as a tourism business; addresses the impact on the local community and demonstrates that the development is of high quality, sustainable buildings which aim to extend the existing tourism offer in the area.

### **Ecology**

- 5.5 This application is supported by a Preliminary Bat Roost Assessment Report, produced by Hawkeswood Ecology Ltd. The Report found limited potential for the building to support bats on the remaining original wall tops and also access to the building interior. Subsequent observation surveys recorded bats foraging around the block and the adjacent area by what appeared to be a maximum of two animals. No roosting activity was observed. Swallows were found using the structure for nesting with two active nests noted during the survey period. Given the finding of the surveys it is considered there are no apparent ecological reasons that would prevent the development proceeding with recommendations made in the report to ensure no harm to protected species occurs.

## Planning Policy Context

### Introduction

- 6.1 The planning policy framework for the determination of this application is provided by the content and scope of national planning guidance, together with the adopted Neath Port Talbot Council LDP. National Planning Policy is largely contained within Planning Policy Wales (PPW) – 11th Edition and Future Wales, published by the Welsh Assembly Government in February 2021. PPW is supplemented by 21 Technical Advice Notes (TANs), the relevant TANs will also be discussed within this chapter.
- 6.2 The Development Plan for the purpose of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 is Neath Port Talbot Local Development Plan (2011 - 2026). The adopted LDP provides the statutory framework for the development and use of land within the plan area during the Plan period (2011 - 2026).

### Planning Policy Wales

- 6.3 PPW Edition 11 was adopted by the Welsh Government in February 2021 and is the principal document for planning considerations in Wales. PPW provides land use planning policy and should be taken into account when preparing planning applications. PPW 11 sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales.
- 6.4 The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation. PPW and Future Wales set out how the planning system at a national, regional and local level can assist in delivering these requirements through Strategic Development Plans (SDPs) and Local Development Plans (LDPs).
- 6.5 Sustainable development is defined as:  
***“Sustainable development” means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals. Acting in accordance with the sustainable development principle means***

***that a body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. "***

- 6.6 Up-to-date development plans are the basis of the planning system and set the context for rational and consistent decision making. Plans at all levels of the development plan hierarchy must be prepared in accordance with national planning policies. Planning applications must be determined in accordance with the adopted plan, unless material considerations indicate otherwise.
- 6.7 The aforementioned Well-being of Future Generations Act is further explored in Section 1 of PPW, within which the 7 goals are further discussed. The goals are intended to shape the work of all public bodies in Wales and are listed as follows:
- A prosperous Wales;
  - A resilient Wales;
  - A healthier Wales;
  - A more equal Wales;
  - A Wales of cohesive communities;
  - A Wales of vibrant culture and thriving Welsh language; and
  - A globally responsible Wales
- 6.8 Under Section 2 – People and Places – Achieving Well Being Through Placemaking, 5 Key Planning Principles are highlighted, under the general heading of Achieving the Right Development in the Right Place which are:
1. *Growing our economy in a sustainable manner*
  2. *Making best use of resources*
  3. *Facilitating Accessible and Healthy Environments*
  4. *Creating and Sustaining Communities*
  5. *Maximising environmental protection and limiting environmental impact.*
- 6.9 Placemaking is a key thread running through the 11th Edition of PPW. It is described as an *"inclusive process, involving all of those with a professional or persona interest in the built and natural environment, which focuses on developing plans, making decisions and delivering developments which contribute to the creation and enhancement of sustainable places."*
- 6.10 PPW emphasises that 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.

- 6.11 Previously developed (also referred to as brownfield) land should, wherever possible, be used in preference to greenfield sites where it is suitable for development. In settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome.
- 6.12 Section 4 – Active and Social Places defines those places which promote our social, economic, environmental and cultural well-being by providing well-connected cohesive communities. Places which are active and social contribute to the seven goals of the Well-being of Future Generations Act. The key issues in this theme include:
- *ensuring there is sufficient housing land available to meet the need for new private market and affordable housing;*
  - *assisting in the delivery of cohesive communities which will meet the needs and are accessible to all members of society, including older people;*
  - *tackling inequalities between communities, delivering services and jobs closer to where people live and acknowledging the importance of inclusive communities and the wider environment for good health and well-being;*
  - *improve sustainable access to services, cultural opportunities and recreation facilities to support people to adopt healthy, culturally fulfilled lifestyles*
- 6.13 Section 6 – Distinctive and Natural Places – this theme covers environmental and cultural components of placemaking. It states:
- “The special and unique characteristics and intrinsic qualities of the natural and built environment must be protected in their own right, for historic, scenic, aesthetic and nature conservation reasons. These features give places their unique identity and distinctiveness and provide for cultural experiences and healthy lifestyles.”***
- 6.14 PPW recognises that all the landscapes of Wales are valued for their intrinsic contribution to a sense of place, and local authorities should protect and enhance their special characteristics, whilst paying due regard to the social, economic, environmental and cultural benefits they provide, and to their role in creating valued places.
- Future Wales**
- 6.15 Published on the 28<sup>th</sup> February 2021, Future Wales comprises the first development plan of its kind within Wales. It is a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant

economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.

- 6.16 Future Wales' spatial strategy is a guiding framework for where large scale change and nationally important developments will be focused over the next 20 years. The strategy blends the existing settlement patterns and the distribution of jobs and homes with a vision of managing change and future trends for the benefit of everyone in Wales.
- 6.17 The National Plan acknowledged the urgent actions and changes in behaviour that were introduced in response to the COVID-19 pandemic and how they will emerge as permanent features of life. These include using spaces differently, travelling more locally and spending more time working from home. The National Plan notes that the planning system must respond to these changes and contribute to a sustainable recovery, shaping places around a vision for healthy and resilient places. Planning Policy Wales is the primary source of detail on how the planning system will support reconstruction efforts.
- 6.18 Future Wales divides Wales into four regions, North, Mid Wales, The South West and The South East. Page 162 highlights how *'Across the South West there are a range of strategic issues. Many of these issues have national, regional and local dimensions and will be delivered through co-ordinated action at all levels.'*
- 6.19 The National Plan identifies 11 outcomes that can be achieved over the next 20 years if the planning system – through Future Wales and other development plans – is focused on the long-term and provides quality development in the right places for the right reasons. These Outcomes are inter-related and inter-dependent, and will improve places and well-being across Wales. The intention is to create a Wales where people live....
1. ... and work in connected, inclusive and healthy places
  2. ... in vibrant rural places with access to homes, jobs and services
  3. ... in distinctive regions that tackle health and socio-economic inequality through sustainable growth
  4. ... in places with a thriving Welsh Language
  5. ... and work in towns and cities which are a focus and springboard for sustainable growth
  6. ... in places where prosperity, innovation and culture are promoted
  7. ... in places where travel is sustainable
  8. ... in places with world class digital infrastructure
  9. ... in places that sustainably manage their natural resources and reduce pollution

10. ... in places with biodiverse, resilient and connected ecosystems  
11. ... in places which are decarbonised and climate resilient

### **Technical Advice Notes**

- 6.20 Planning Policy Wales is supplemented by 19 topic-based Technical Advice Notes (TANs). The most relevant to this application are discussed, in turn, below:

#### ***TAN 6: Planning for Sustainable Communities***

- 6.21 This Technical Advice Note was adopted in 2010 and provides practical guidance on the role of the planning system in supporting the delivery of sustainable rural communities.
- 6.22 Paragraph 3.2.1 states that when assessing planning applications for the re-use or adaptation of a rural building, the primary consideration should be whether the nature and extent of the new use proposed for the building is acceptable in planning terms. It should not normally be necessary to consider whether a building is no longer needed for its present agricultural or other purposes (although in the case of a tenanted agricultural building, the value in planning terms of the existing use should be taken into consideration).

#### ***TAN 12: Design***

- 6.23 This Technical Advice Note was revised in July 2014 in order to update new requirements, including those for Design and Access Statements. The purpose of TAN 12 is to provide advice on design considerations and the role of the planning system in supporting sustainable and innovative design solutions. In relation to housing design, it states (Para 5.11.2) that local planning policy and guidance should aim to:
- *create places with the needs of people in mind, which are distinctive and respect local character;*
  - *promote layouts and design features which encourage community safety and accessibility;*
  - *focus on the quality of the places and living environments for pedestrians rather than the movement and parking of vehicles;*
  - *avoid inflexible planning standards and encourage layouts which manage vehicle speeds through the geometry of the road and building*
  - *promote environmental sustainability features, such as energy efficiency, in new housing and make clear specific commitments to carbon reductions and/or sustainable building standards;*
  - *secures the most efficient use of land including appropriate densities; and*
  - *consider and balance potential conflicts between these criteria.*

- 6.24 This TAN also provides a definition of “character” which is contained within the guidance on designing in context:

*“..... Appraising “character” involves attention to topography; historic street patterns, archaeological features, waterways, hierarchy of development and spaces, prevalent materials in buildings or floorscape, architecture and historic quality, landscape character, field patterns and land use patterns, distinctive views (in and out of the site), skylines and vistas, prevailing users and plan forms, boundary treatments, local biodiversity, natural and cultural resources and local distinctive features and traditions (also known as vernacular elements).”*

**TAN 23: Economic Development**

- 6.25 TAN 23, adopted in 2014, defines economic development broadly so that it can include any form of development that generates wealth, jobs and income.

- 6.26 Paragraphs 1.2 (1-2) highlight that the economic benefits of proposals and market needs should be fully considered when determining planning applications:

*1.2.1 - The economic benefits associated with development may be geographically spread out far beyond the area where the development is located. As a consequence, it is essential that the planning system recognises, and gives due weight to, the economic benefits associated with new development.*

- 6.27 Paragraph 3.2 discusses the adaptation and re-use of rural buildings, it states:

*3.2.1- The re-use and adaptation of existing rural buildings has an important role in meeting the needs of rural areas for commercial and industrial development, and tourism, sport and recreation. In recognising this, local planning authorities are expected to adopt a positive approach to the conversion of rural buildings for business re-use, especially those buildings located within or adjoining farm building complexes on the basis that:*

- they are suitable for the specific use;*
- conversion does not lead to dispersal of activity on such scale as to prejudice town and village vitality;*
- their form, bulk and general design are in keeping with their surroundings;*
- imposing conditions on a planning permission overcomes any planning objections, for example on environmental or traffic grounds, which would otherwise outweigh the advantage of re-use;*
- if the buildings are in the open countryside, they are capable*

*of conversion without major or complete reconstruction;*

- *conversion does not result in unacceptable impacts upon the structure, form, character or setting where the building is of historic and / or architectural interest.*

### **Neath Port Talbot Local Development Plan**

- 6.28 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning application decision should be made in accordance with the authority's adopted development plan, unless material considerations indicate otherwise. In this instance, the statutory development plan for this application site is provided in the Neath Port Talbot Local Development Plan (2011 - 2026).
- 6.29 In terms of policy allocations, the site is classified as 'white land' outside of the Settlement Boundary, within the Countryside. The site also lies within a Special Landscape Area (Dulais Valley) and a Safeguarded Mineral Area. The following LDP policies are considered relevant in the context of the proposed development:

| Policy      | Relating to                                                       |
|-------------|-------------------------------------------------------------------|
| Policy SP1  | Climate Change                                                    |
| Policy SP2  | Health                                                            |
| Policy SP3  | Sustainable Communities                                           |
| Policy SP4  | Infrastructure                                                    |
| Policy SP13 | Tourism                                                           |
| Policy SP14 | The Countryside and the Undeveloped Coast                         |
| Policy SP15 | Biodiversity and Geodiversity                                     |
| Policy SP16 | Environmental Protection                                          |
| Policy SP20 | Transport Network                                                 |
| Policy SP21 | Built environment and historic heritage                           |
| Policy SP22 | Welsh Language                                                    |
| Policy SC1  | Settlement limits                                                 |
| Policy I1   | Infrastructure requirements                                       |
| Policy EN5  | Conversion and Extension of Existing Buildings in the Countryside |

|            |                                               |
|------------|-----------------------------------------------|
| Policy EN6 | Important Biodiversity and Geodiversity Sites |
| Policy BE1 | Design                                        |
| Policy EN7 | Important Natural Features                    |
| Policy T01 | Tourism development in the countryside        |
| Policy TR2 | Design and Access of New Development          |
| Policy WL1 | Development in Language Sensitive Areas       |

6.30 The most pertinent planning policies have been copied below;

**Policy SC 1: Settlement Limits**

*Development within settlement limits that is proportionate in scale and form to the role and function of the settlement as set out in the Settlement Hierarchy will be acceptable in principle.*

*Outside settlement limits, development will only be permitted under the following circumstances:*

- 1. It constitutes a sustainable small scale employment use adjacent to a settlement limit; or*
- 2. It constitutes live-work unit(s) immediately adjacent to a settlement limit in the Valleys Strategy Area only; or*
- 3. It constitutes the small-scale expansion of an existing business or the suitable conversion of an existing building; or*
- 4. It constitutes the appropriate replacement of an existing dwelling; or*
- 5. It is an affordable housing exception site; or*
- 6. It is an appropriate rural enterprise dwelling; or*
- 7. It is an appropriate 'One Planet Development'; or*
- 8. It is a sustainable tourism or farm diversification proposal that is suitable in a countryside location; or*
- 9. It is associated with the provision of public utilities, infrastructure and waste management facilities that cannot reasonably be located elsewhere; or*
- 10. It is associated with either agriculture, forestry, minerals or energy generation; or*
- 11. It relates to the appropriate provision of accommodation for Gypsies / Travellers; or*
- 12. It constitutes the provision of open space and small scale ancillary facilities adjoining the settlement limit.*

*Where development is permitted outside settlement limits, any new buildings must be located adjacent to existing buildings or settlements wherever possible and be of an appropriate scale and form.*

### **Policy TO 1: Tourism Development in the Countryside**

*Tourism proposals outside of settlement limits will only be permitted where all of the following criteria are satisfied:*

- 1. It is demonstrated that the proposal is viable and contributes towards the quality and economic sustainability of the tourism industry;*
- 2. It is demonstrated that either the proposal requires a countryside location or it could not be accommodated within an existing settlement;*
- 3. The proposal would not have an adverse impact upon the landscape, ecology, and cultural heritage and would not adversely impact upon the social, economic, environmental or residential amenity of the area;*
- 4. The proposal does not create unacceptable levels of vehicular traffic, cause a detriment to highway safety and access can be provided by a range of transport modes.*

### **Policy EN5: Conversion and Extension of Existing Buildings in the Countryside**

*The alteration, extension or conversion of existing suitable buildings outside the defined settlement limits for residential, employment, or tourism uses will only be permitted where:*

- 1. The existing building is structurally sound and is capable of conversion without substantial major external alteration or reconstruction.*
- 2. In the case of changes of use to residential purposes alone:*
  - (a) It can be demonstrated that there are no viable alternative uses to secure the retention of the building; and*
  - (b) That the building is of architectural and/or historic merit.*
- 3. In the case of residential extensions, the extension does not result in a disproportionate increase in the size, scale and massing of the building*

### **Supplementary Planning Guidance**

- 6.31 The following adopted supplementary planning guidance are considered relevant to the proposal:

- Parking Standards (October 2016)
- Biodiversity and Geodiversity (May 2018)
- Design (July 2017)
- Development and the Welsh Language (July 2017)

## Appraisal

### Overview

7.1 This section aims to identify the main issues relevant to the determination of the application and assess the scheme against the relevant planning policy framework. These matters are considered to be as follows:

- The **principle of development** at this location
- The impact of the development on the **character and appearance of the surrounding area**;
- The impact of the development **on residential amenity**;
- The impact of the development on **biodiversity**;
- **Highway and Access** considerations;
- Any other material considerations

### *Principle of Development*

7.2 The proposal seeks to convert a rural buildings into holiday accommodation at Tirlan Farm, Cilfrew. The site is located outside defined settlements and is therefore within the open countryside, defined by Policy SP14 and SC1 of the LDP.

7.3 National and Local policy, embodied in Planning Policy Wales and NPT LDP seek to encourage tourism development where it can contribute to improved visitor experiences and sustain the local economy, and where this can be done without damage to the very features of that landscape that make it worthy of protection. To do this, guidance seeks to maximise the use of land as a resource and emphasises that planning policies, decisions and proposals should promote resource efficient and climate change resilient development that minimise land take and urban sprawl, especially through the re-use of suitable previously developed land and buildings. The proposed development meets the above requirements in establishing the principle for development as it represents an efficient use of previously developed buildings for tourism development which aims to sustain the local economy.

7.4 LDP Policy SC1 allows for certain types of development within the designated countryside if it falls within a number of defined exceptional circumstances, in line with national planning guidance (namely PPW11 and TAN6) and wherever possible, existing buildings should be re-used or adapted. Policy SC1 allows for development which is a sustainable tourism or farm diversification proposal that is suitable in a countryside location. It is considered that the proposal constitutes sustainable tourism and is considered acceptable within the designated countryside. This is echoed within Policy TO1 which

states that outside settlement limits, holiday accommodation will be permitted where it is viable and contributes towards the quality and economic sustainability of the tourism industry.

- 7.5 Policy EN5 of the LDP permits the conversion of existing rural buildings to other uses if the existing building is structurally sound and is capable of conversion without substantial major external alteration or reconstruction. From a visual inspection, the building is structurally sound and so a scheme for refurbishment is considered justified without the need for extensive rebuilding or demolition. The application is also supported by a Structural Survey which confirms that the traditional building would be suitable for change of use, given that it is free from any major defects and in good condition.
- 7.6 In light of the above, the principle of developing the site for the purpose proposed is clearly established. As confirmed under subsequent headings, it will not give rise to any significant adverse impacts upon the character of the area, local amenities and highway safety whilst providing a contribution to the area's recreational and tourism provision.

***The impact of the development on the character and appearance of the surrounding area***

- 7.7 The site is located within the countryside, adjacent to agricultural fields and within a Special Landscape Area. It is acknowledged within Policy EN2 that development within the designated Special Landscape Areas will only be permitted where it is demonstrated that there will be no significant adverse impacts on the features and characteristics for which the Special Landscape Area has been designated. Given the location of the site, the minor scale of the development, use of an existing building and the fact that it is well screened from the main road and therefore not visually prominent, it is considered that the impact on the SLA is negligible. The impact upon the local landscape is discussed further within the accompanying Tourism Needs Development Impact Assessment, which confirms the negligible impact.
- 7.8 In the case of the proposed development, the building is already situated within the landscape and as such any impact on the landscape would be negligible as a result.
- 7.9 The proposed conversion and the resultant holiday let is considered to be of a scale, form, design, density and intensity of use that is compatible with the character of the area. The design of the property has been subject to detailed changes following pre-application advice and discussions with the Case Officer. It is considered that the submitted plans reflect a proposal which is complementary to its

existing setting and does not result in an overbearing impact on the existing farmhouse adjacent.

- 7.10 The proposal contributes to the conservation and enhancement of the area. The conversion retains the traditional rural agricultural character though the reuse of existing openings, retention of existing external finishes and maintaining the existing scale and form. All roof and wall finishes are proposed to remain as existing. Minor alterations are proposed to allow the use of the outbuilding as accommodation. As such, the proposals are considered to provide a betterment to the existing vacant property currently existing at site.
- 7.11 It is therefore considered that the proposal complies with Policies BE1, SC1, TO1 and EN5 of the LDP and the appropriate SPG (Design SPG' published July 2017), in that the development will not result in negligible impacts on the character of the area as a result of the conversions.

***The impact of the development on residential amenity***

- 7.12 The site is located outside of the settlement boundary, within the designated countryside. No residential properties are identified within the vicinity of the application site. As such, no residential amenity matters are considered to be of concern as a result of this development. The nearest residential dwelling is located to the south of the site.
- 7.13 The site is isolated in its location; however, it is considered that all elements of the proposal have been considered carefully to ensure there is no detrimental impact on the amenity of adjacent residents by way of light and noise pollution and/or general amenity disturbance, in accord with Policy BE1 and EN8 of the LDP.

***The impact of the development on biodiversity***

- 7.14 The application comprises the conversion of a rural buildings to holiday accommodation. Given the traditional nature of the stables, this application is supported by a Bat Survey Report, prepared by Hawkeswood Ecology Ltd. The report confirms that there is limited potential for the building to support bats. The plans have incorporated the recommendations from the report and propose a new bat box to the northern elevation of the property.
- 7.15 It is therefore considered that proposed development will not have a negative impact upon the bats using the area and in turn complies with Policy TO1, SP15 and SP16 of the LDP.

***Highway and Access considerations;***

- 7.16 The site is situated outside the development boundary, on an isolated farm. The site is primarily accessed via an established, private driveway which connects to Oak View Road leading to Cilfrew. This existing access will remain as the primary access to the site following the conversion of the property to holiday accommodation. It is considered that traffic associated with holiday lets is generally lower in volume than that associated with general residential use and as such, the development is not expected to result in an intensification of the access.
- 7.17 Safe access for vehicles exist on site through the primary access road. To facilitate this, improvements to the access road are proposed including a pedestrian footpath running alongside the existing access road and lighting. Numerous passing bays are also proposed. In addition, the applicant has recently completed extensive works to the entrance of the access road to ensure it has adequate visibility splays and is safe for existing and future vehicles.
- 7.18 The site comprises sufficient parking and movement areas for vehicles, with both formal and informal parking areas located within the site. The development proposes 3 car parking spaces to accommodate the new holiday unit. This is in line with the Councils Parking Standards SPG and Policy TR2, BE1 and TO1 of the LDP.

#### **Other materials considerations**

##### ***Flooding and Drainage***

- 7.19 According to Natural Resources Wales' Development Advice Map, the site is located within Flood Zone A which is considered to be at little or no risk of fluvial or coastal/tidal flooding. As a result, the proposals are not considered to result in unacceptable flooding impacts.
- 7.20 Regulation, adopted on the 7th January 2019, requires all new developments of more than 1 dwelling house or where construction area is 100m<sup>2</sup> or more to submit a Sustainable Drainage Systems (SuDS) application demonstrating compliance with the statutory SuDS standards for the design, construction, operation and maintenance of surface water drainage systems serving new developments.
- 7.21 The proposals confirm that the discharge of surface water will be done by the use of gradients to drain into a soft landscaped area, by laying permeable surfacing – concrete block permeable paving or similar.

## Conclusion

- 8.1 This Planning Statement has been prepared on behalf of Catrin Stephens to accompany a planning application for the proposed conversion and adaptation of an outbuilding to holiday accommodation at Tirlan Farm, Cilfrew, Neath.
- 8.2 The site comprises a vacant, traditional outbuilding situated outside of the settlement boundary. The site is not subject to flood risk or identified scheduled ancient monuments or listed buildings. Previous pre-application sought at the site confirms that the conversion of the outbuilding to holiday accommodation is accepted, in principle, at the site.
- 8.3 Local planning policy and supporting planning guidance documents generally support the principle for conversions to holiday accommodation. Local policy confirms that tourist accommodation is preferable to private residential use when converting rural outbuildings. The building has stood on the site for many years. Its retention and conversion to holiday accommodation will therefore seek to safeguard its longevity for future generations to enjoy.
- 8.4 The existing outbuilding is confirmed by the structural survey to be of sound structure and proposed conversions are in keeping with the surrounding context. The proposal will not result in the loss of any special historical architecture. It is considered that the proposal produces a unique business opportunity for the applicant which will contribute to the local economy and tourism sector.
- 8.5 In light of the above, it is concluded that the proposal fully accords with both national and local policies and there are no material considerations which should prevent the planning application from being determined in accordance with the relevant planning policy framework. In this respect, it is respectfully requested that the Neath Port Talbot Council consider this application favourably and grant planning permission for the proposal.