

Planning and Design & Access Statement for
Neath Port Talbot Council

WENALLT FARM, 43 DAN Y BRYN, TONNA, NEATH, SA11 3QH

19 July 2022

Our Ref: 21-01860

Contents

1	Introduction.....	1
2	Site and Surroundings.....	2
3	Planning History	3
4	The Proposal	4
5	Planning Policy and Guidance	5
6	Pre-Application Engagement	7
7	Planning Considerations.....	8
8	Conclusions.....	11

Appendices

Appendix 1	Site Location Plan
Appendix 2	Local authority pre-application response letter

1 INTRODUCTION

- 1.1 This planning statement has been prepared by Rapleys LLP for Archi Intelligence o.b.o. Mr. B Jones, relative to proposed development at Wenallt Farm, Tonna, Neath, Glamorgan, Wales, SA11 3 QH. The proposal is for a change of use from undeveloped land to a campsite (sui generis) for 12 camping pitches, and female, male and disabled WC and shower facilities.
- 1.2 The site falls within the administrative area of Neath Port Talbot Council and is defined on the Site Location Plan enclosed at **Appendix 1**.
- 1.3 The proposals have been informed by pre-application engagement with and feedback from officers at Neath Port Talbot Council, and a letter responding to the pre-application request, from the local authority, is enclosed at **Appendix 2**.

STRUCTURE OF THE PLANNING STATEMENT

- 1.4 This planning statement explores the key planning considerations relevant to the site's redevelopment and is set out as follows:
- Chapter 2: Site and Surroundings
 - Chapter 3: Planning History
 - Chapter 4: The Development Proposal
 - Chapter 5: Planning Policy and Guidance
 - Chapter 6: Pre-Application Consultation
 - Chapter 7: Planning Considerations
 - Chapter 8: Conclusions
- 1.5 This planning statement provide an overarching background to the proposal and should be read in conjunction with submitted documents and plans prepared in the planning application, which together address the relevant matters in detail.

CONTENT OF THE APPLICATION

- 1.6 This planning statement is accompanied by the following submission documents, and reflects the scope of information requested by the local authority during pre-application discussions:
- Application forms/certificates (under Planning Portal Ref: PP-11413390);
 - Existing Plans (Site Location Plan), Ref: MAW 4-3-22 EPR5 Rev5;
 - Proposed Plans, Ref: MAW 15-7-22 PPR7 Rev7;
 - Proposed Plans 1:200, Ref: MAW 15-7-22 PPZR2 Rev2;
 - Existing And Proposed Plans and Elevations, Ref: MAW 15-7-22 EAPPAE Rev3;
 - Topographical Survey, Ref: 127A/22;
 - Site/Cross Sections, Ref: 127/1/22 (with confirmation of the location of the sections on the above Topographical Survey);
 - Ecological Assessment prepared by I&G Ecological Consultation, dated February 2022, and
 - Arboricultural Survey to BS5837:2012.
- 1.7 The plan annotate the location of the nearby public right of way in purple.
- 1.8 The submissions conclude that the proposed development is acceptable, and supportable, in planning terms.

2 SITE AND SURROUNDINGS

- 2.1 The site is located to the southwest of Tonna. The campsite is proposed within three fields which are surrounded by wooded areas, and currently undeveloped land. Access to the property is provided off a track from Wenallt Road.
- 2.2 In terms of the prevailing area, it is predominately rural fields or wooded. According to National Resources Wales, the site is very low risk of flooding from rivers, sea, surface water and small watercourses.

3 PLANNING HISTORY

- 3.1 From a review of the Council's available online records, there have been no planning applications on the site since January 1974. The site has however previously been used as a campsite under the been operating under the 56 days permitted development rights as per *The Town and Country Planning (General Permitted Development) (Amendment) (No.) (Wales) Order 2021*.
- 3.2 As the 56 days are now over the site has been returned to its agricultural use.

4 THE PROPOSAL

- 4.1 The proposal seeks permission for a 12-pitch campsite and associated facilities (the erection of four shower buildings and four WCs, and use of two existing shepherd huts and a porta-cabin in association with the campsite).
- 4.2 The proposals include a parking area, and a turning area for vehicles to ensure that they can enter and leave the site in forward gear.
- 4.3 When reviewing the proposals, it must be recognised that the proposed development is for largely temporary structures and for use mainly during the summer months. The main attraction of the site is that it is such an undisturbed area full of wildlife, the owners wish to protect this and ensure that the proposal has the lowest possible impact on the site and its surroundings, and is as sustainable as it can be.

5 PLANNING POLICY AND GUIDANCE

NATIONAL POLICY

- 5.1 Relevant Central Government Policy is contained within Planning Policy Wales (PPW) (Edition 11) adopted February 2021 and is supplemented by twenty-one topic based Technical Advice Notes (TANs).
- 5.2 The PPW is underpinned by the key planning principles which seek to achieve the right developments in the right places.

Tourism

- 5.3 Paragraph 5.5 *Tourism* of the Planning Policy Wales sets out that the planning system encourages tourism where it contributes to economic development, conservation, rural diversification, and social inclusion while recognising the needs of visitors and that of the local community. Specifically, within rural areas in which tourism-related development is an essential element in providing for a healthy and diverse economy.

The Rural Economy

- 5.4 Within paragraph 5.6.1 discusses, the importance of the rural economy, to develop a wide base to be adaptable and resilient to the challenges faced now and in the future. Paragraph 5.6.10 states that Local Planning Authorities should adopt a positive approach to diversification projects in rural areas. Additional small business activities can often be sustainably located on farms and provide additional income streams. Diversification can strengthen the rural economy.
- 5.5 Paragraph 5.6.11 states that while efforts should be made to locate diversification proposals, in order to ensure that they are well-served by public transport. However, it should be recognized that only certain diversification projects will only be accessible by car.
- 5.6 Within assessing diversification within the rural economy paragraph 5.6.13 states that diversification activities come in many forms and include both agricultural and non-agricultural activities. The diversification activities named include tourism projects, the PPW declares that where there is no detrimental impact on the environment and local amenity, these schemes should be supported.

LOCAL POLICY

- 5.7 The Development Plan relevant to the site comprises the Local Development Plan (2011 to 2026) adopted in January 2016.
- 5.8 According to the adopted Proposals Map, the site is designated as within SP5 Coastal Corridor Strategy Area, Policy M2/1 Settlement Protection Zone and partly in EN2/3 Special Landscape Area Vale of Neath.
- 5.9 The following policies, summarised below, are therefore considered relevant when assessing the proposal:

Policy SC1 (Settlement Limits) - outline that development outside of settlement limits, will only be acceptable if it constitutes small-scale expansion of an existing business, is a sustainable tourism or farm diversification proposal that is suitable in a countryside location.

Policy SP13 (Tourism) - sustainable tourism development, which is high quality shall be encouraged, alongside providing a flexible approach to the development of tourism facilities

Policy TO1 (Tourism Development in the Countryside) tourism proposals outside of the settlement limits will only be permitted where the following criteria is satisfied;

-
- the proposal can be demonstrated to be viable and contributes to the quality and economic sustainability of the tourism industry;
 - it is demonstrated that either the proposal requires a countryside location or that it cannot be accommodated within an existing settlement;
 - the proposal will 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;
 - 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 SP14 (The Countryside and Undeveloped Coast) outlines that the countryside and undeveloped coast, including landscapes, seascapes and agricultural land, will be protected and where possible enhanced, through the control of inappropriate development.

Policy EN1 (The Undeveloped Coast) development proposals within the undeveloped coast will only be permitted where it is demonstrated that a coastal location is necessary, and the development cannot be accommodated on the development coast, and if the proposal is the provision of appropriate recreational or leisure.

Policy EN2/3 (Special Landscape Areas Vale of Neath) the proposal site is partly within the Vale of Neath, 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.

Policy TR2 (Design and Access of New Development) development proposals will only be permitted where they do not compromise the safe, effective, and efficient use of the highway, provide appropriate levels of parking and cycling facilities, the development is accessible by a range of travel means, transport assessments and travel plans are provided.

6 PRE-APPLICATION ENGAGEMENT

PRE-APPLICATION ADVICE FROM THE LOCAL AUTHORITY

- 6.1 Pre-application advice was provided by the Council in a letter dated 09 December 2021, which is included within the application. The overall tenor of the letter was supportive of the proposal, and confirmed that it complies with criterion 8 of policy SC1, which states that development outside settlement limits will be permitted if ‘it is a sustainable tourism or farm diversification proposal that is suitable in a countryside location.’
- 6.2 The pre-app advice stated that the proposal would, however, need to demonstrate compliance with the first three criteria of Policy TO1, and this is addressed in the following section.
- 6.3 Information covering the following topics was also requested in the pre-app letter, which are addressed in the following section:
- Comment on the site’s location within the Special Landscape Area
 - Highways and Pedestrian safety
 - Biodiversity
 - Public Rights of Way
 - Sustainable Drainage
- 6.4 The following documentation was also requested, but it has subsequently been agreed with the pre-application request case officer that it is not needed for registration of the application:
- Pre-application report
 - Contamination report
 - Coal mining risk assessment

Comment on these is provided below.

Pre-application report

- 6.5 IT has been agreed with the officer that, through amendments to the applications “red line” the proposal no longer falls into the category of major development, and that a pre-application report is therefore not required.

Contamination report

- 6.6 This has also been confirmed as not necessary for registration of the application.

Coal mining risk assessment

- 6.7 As the buildings will not have foundations, there are no material groundworks involved, and therefore there should be no requirement for a coal mining risk assessment.

FURTHER INFORMATION REQUESTED BY THE LOCAL AUTHORITY

- 6.8 A planning application was submitted in March 2022, but not validated by the local authority as further information was requested, including:
- A tree survey;
 - Site sections, and
 - Further detail on the drawings (including the identification of the nearby public right of way).
- 6.9 This information is included in this application.

7 PLANNING CONSIDERATIONS

PRINCIPLE OF PROPOSED DEVELOPMENT

- 7.1 In the context of the above, the following tells in favour of the proposal:
- 7.2 As set out within the Local Development Plan sustainable tourism developments are acceptable outside of settlement boundaries when the proposal is within a suitable countryside location. The proposal presents a small scale campsite in which cannot be accommodated in the settlement boundaries due to the nature of its rural setting. The proposal seeks a small-scale sustainable 12-pitch campsite within an existing farm, the proposal allows the current business to diversify their income stream as supported by Planning Policy Wales.
- 7.3 The proposal is viable, as demonstrated by the ‘trial run’ temporary operation under the 56 days permitted development rights and the business plan provided to the local authority under separate cover (as it is commercially sensitive). The proposal will be of a high quality and create jobs not only on the site, but through the contribution to the economic prosperity of the local area. A campsite in this location will attract tourists into the area who will then contribute to local businesses economic activity.
- 7.4 A rural campsite evidently needs a rural location, therefore it would not be appropriate to accommodate this such facility within the settlement boundaries. The site is in a highly sustainable location for tourism, in close proximity to Tonna and public transport links. The proposal will be sensitively designed and the land use consistent with its rural location, and therefore the proposal will have no adverse impact.
- 7.5 The proposed site will be accessed via Wenallt Road, followed by a private track. Due to the rural nature of the proposed site, it is accessible primarily via car. The proposal is small in scale and will not have any impact on the local highway network. Although in the countryside, it is approximately 15 minute walk to the nearest bus stop on Henfaes Road, and the amenities of Tonna are very close by, and therefore the proposal is within a highly sustainable location.
- 7.6 Below are responses to comments made by the Council during pre-app, as detailed above:
- 7.7 It is demonstrated that the proposal is viable and contributes towards the quality and economic sustainability of the tourism industry. On this point the pre-app letter notes:
- In respect of Point 1 specifically, we would normally expect information such as a business plan. However, sensitive information such as this would remain/marked confidential on the planning file. I would also advise that I have discussed the proposal with our Tourism Officer who has advised that the recent bed stock survey shows that there is limited provision within the County in relation to camping and caravanning accommodation. Coupled with the recent trends which have seen an increase in demand for this type of accommodation across Wales and the UK (fuelled by the pandemic and the rise in campervan ownership), they have advised that a development of this type would be beneficial to attracting overnight visitors to the area.*
- 7.8 Beyond recognition that there is a limited provision of campsites in the area, set against a growing demand, the application is providing a business plan to justify the economic sustainability of the site. As this includes commercially sensitive information, it will be provided to the council immediately following the submission of the planning application on the Planning Portal.
- 7.9 It is demonstrated that either the proposal requires a countryside location or it could not be accommodated within an existing settlement

The proposal is for a campsite that offers ‘wild camping’ in a rural area and it is therefore a necessary part of the proposed scheme that it be located in the countryside. It could not be accommodated within an existing settlement, as the provision of a campsite in such a location would significantly and detrimentally affect the site’s attractiveness to prospective visitors.

- 7.10 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.

We can confirm that the proposal would have no adverse impact on the landscape, ecology or cultural heritage and would not adversely impact upon the social, environmental or residential amenity of the area.

- 7.11 As the proposal drawings make clear, the quantum of built development on the site will be as small as possible, and of a style and design that is very much in keeping with the surrounding landscape area. The proposal will use sustainable, ecologically friendly strategies for the day-to-day running and management of a campsite.

- 7.12 As stated in the pre-app advice, ‘Due to the remote location of the application site, the proposal is unlikely to have any unacceptable issues in terms of overlooking, overbearing or overshadowing. Furthermore, there are unlikely to be any overriding issues in terms of noise and disturbance.’

- 7.13 In terms of social and economic and residential amenity. The proposal will have no adverse effect on residential amenity, and is considered to positively contribute to the social and economic amenity of the area, bringing in tourists and creating employment opportunities within the campsite. In this context, the application should be supported in principle by the local authority.

SPECIAL LANDSCAPE AREA

- 7.14 As the pre-app letter notes, it is only the access road that is within the Special Landscape Area (SLA), which is already present on the site and no works are proposed to it.

- 7.15 The proposed development comprises a very modest amount of built development, much of which is already in place and has already been used from the proposed purposes. The design of these structures is entirely sympathetic to the SLA, and the proposal will have no significant adverse impact on the features and characteristics of the SLA.

VISUAL AMENITY

- 7.16 As stated above, the proposed development comprises a very modest amount of built development, much of which is already in place and has already been used from the proposed purposes. The design of these structures is entirely sympathetic to the SLA, and the proposal will have no significant adverse impact on the features and characteristics of the SLA.

HIGHWAYS AND PEDESTRIAN SAFETY

- 7.17 The pre-application requested further information about car parking and turning areas. The application includes details of parking in the application and the turning area on the submission drawings. However, please note that these will not be paved or marked out on the site, in order to preserve its rural character. Rather, the plan demonstrates clearly that appropriate parking is available on the site, and that there are adequate turning areas for vehicles to enter and exit the site in forward gear.

BIODIVERSITY

- 7.18 An ecological assessment has been submitted, which confirms that the proposal is acceptable on biodiversity grounds.

PUBLIC RIGHTS OF WAY

- 7.19 We can confirm that Footpath 15, which crosses over the application site, will not be affected in any way by the proposal. Not least, no development shall be undertaken along its route.

SUSTAINABLE DRAINAGE

- 7.20 Regarding the waste water the proposal will use the soakaway system into a tank which will then be reused on the landscape for watering during the summer months, in line with grey water guidelines.
- 7.21 Eco-toilets will be used on the site. System water is not required as all the waste goes into a tank with sawdust. The waste is then held in the tanks for 128 days, after which it can be used as compost. This was the system used under the 56 day trial. It worked well, and was an attractive strategy in the eyes of the guests who favoured the use of an eco-friendly strategy.

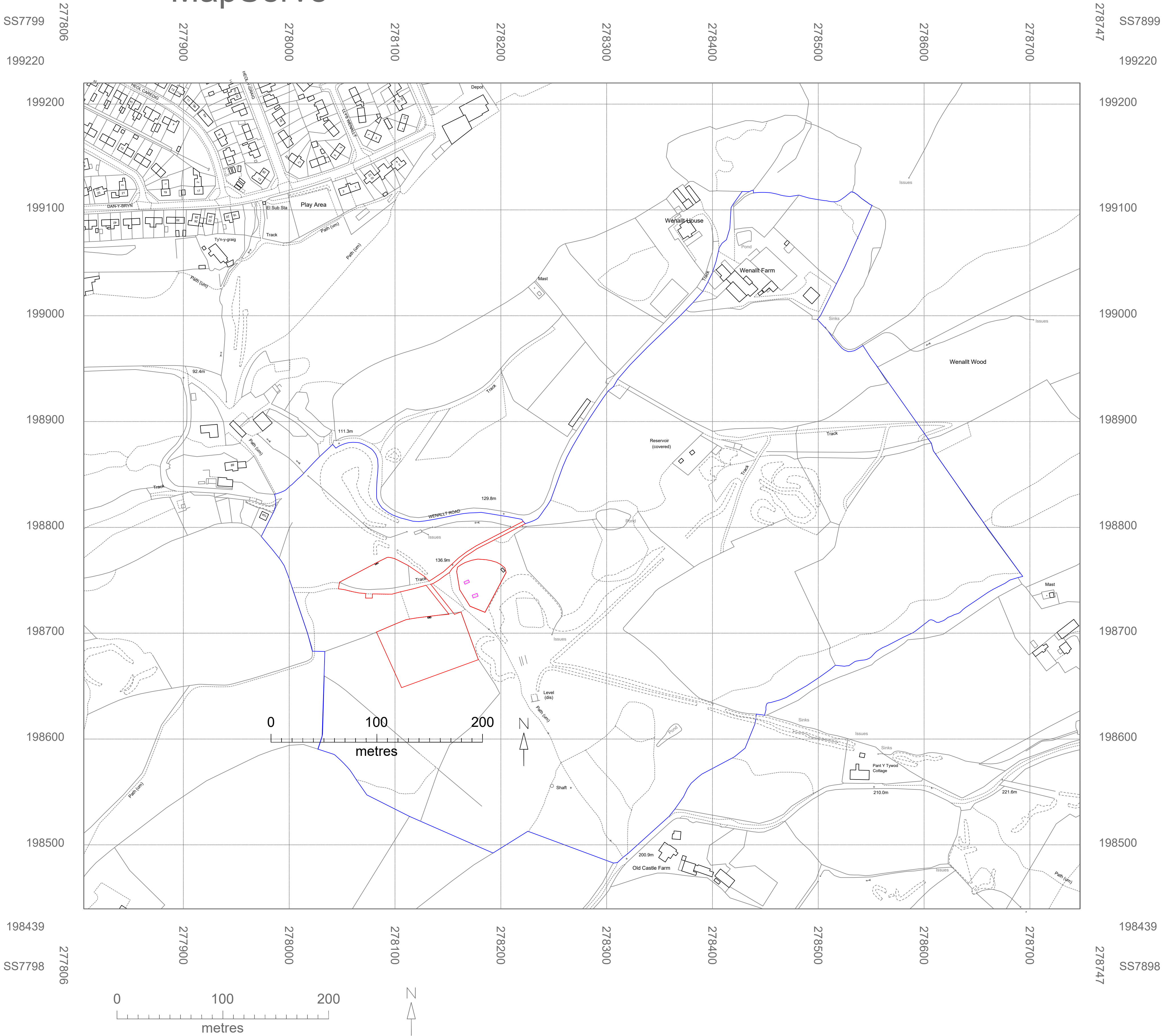
8 CONCLUSIONS

- 8.1 This planning /design & access statement forms part of a wider submission which has been prepared in support of a full planning application for a 12 birth campsite, and associated toilet and shower facilities at Wenallt Farm, Tonna.
- 8.2 The proposed development is for largely temporary structures and for use mainly during the summer months. The main attraction of the site is that it is such an undisturbed area full of wildlife, the owners wish to protect this and ensure that the proposal has the lowest possible impact on the site and its surroundings, and is as sustainable as it can be.
- 8.3 As such the proposal must be located in a rural context, and in this respect and others the development is in accordance with Policies SC1 and TO1, and should be supported in principle.
- 8.4 The application submission has been made in accordance with the advice provided during the pre-application process, and all relevant development management issues raised through this process have been addressed.
- 8.5 In this context, planning permission should be granted at the earliest possible juncture.

Appendix 1

SITE LOCATION PLAN

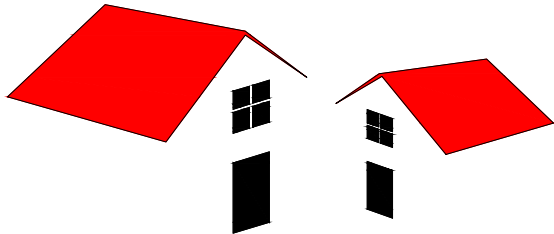
MapServe



Revision Register

No.	Description	Date	Approved by
1			

Note:



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CLIENT:	Mr A Williams Regarding Wenallt Wild Camp Wenallt Farm Towns SA11 3QH	DATE:	04-03-2022	Approved by:		DATE:	
DWG NO:	MAW 4-3-22 EPR2	DRAWN BY:	RG				
DWG TITLE:	Existing Plans Rev2						

Appendix 2

PRE-APPLICATION RESPONSE



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

Date Dyddiad	9 th December 2021
Direct line Rhif ffôn	01639 686729
Email Ebost	r.borthwick@npt.gov.uk
Contact Cyswllt	Russell Borthwick
Your ref Eich cyf	
Our ref Ein cyf	Q2021/0223

Mr Jason Lowes
Rapleys
70 Pall Mall
London
SW1Y 5ES

BY EMAIL ONLY

Dear Sir,

Town and Country Planning Act 1990

Pre-App. Ref.: Q2021/0223
PROPOSAL: Statutory Pre-application for a 12-pitch campsite and associated shower-block facilities
LOCATION: Wenallt Farm, Wenallt Road, Tonna, Neath.

I refer to your correspondence received on 26 October 2021, concerning the above and your request for pre-application advice. Having considered the nature of submission, I respond as follows.

Local Context and Constraints

- Public Rights of Way crossing the site.
- Potential for Contaminated Land.
- SINC Watercourse.
- SINC Woodland.
- Coal Mining High Risk Area.
- Scheduled Ancient Monument Consultation Zone (500m+).

Please note that this information is based on our current records and is, as far as possible, accurate. Nevertheless, we reserve the right to advise you of any additional constraints that may be identified at the time of your application.

Amgylchedd ac Adfywio

Ceri Morris Pennaeth Cynllunio a Gwarchod y Cyhoedd

Y Ceiau, Ffordd Brunel, Parc Ynni Baglan, Castell-nedd SA11 2GG

Ffôn 01639 686868

Environment and Regeneration

Ceri Morris Head of Planning and Public Protection

The Quays, Brunel Way, Baglan Energy Park, Neath SA11 2GG

Tel 01639 686868

Croesewir gohebiaeth yn y Gymraeg a byddwn yn ymdrin â gohebiaeth Gymraeg a Saesneg i'r un safonau ac amserlenni.

We welcome correspondence in Welsh and will deal with Welsh and English correspondence to the same standards and timescales.

Relevant Planning History

From an examination of our records, the application site/ property has the following relevant planning history:

- P1979/0657 Triple Garage. Approved 16/11/79.
- N1983/0085 Conversion of existing barn to dwellinghouse. Refused 31/08/83.
- P2006/0455 Extension to existing dwelling and construction of detached garage. Approved 11/05/06.
- P2007/0478 Conversion of agricultural building to residential use and extension of building to rear to provide a ground-floor reception room and first-floor bedroom. Approved 17/05/07.

Relevant Planning Policies

In addition to national guidance contained within Planning Policy Wales, any application would be considered against the Policies within the Adopted Neath Port Talbot Local Development Plan, details of which are available on the Council's web site by visiting www.npt.gov.uk/ldp. The relevant policies would include:

Strategic Policies:

- [Policy SP5 Development in the Coastal Corridor Strategy Area](#)
- [Policy SP13 Tourism](#)
- [Policy SP14 The Countryside and the Undeveloped Coast](#)
- [Policy SP15 Biodiversity and Geodiversity](#)
- [Policy SP16 Environmental Protection](#)
- [Policy SP20 Transport Network](#)

Topic Based Policies:

- [Policy SC1 Settlement limits](#)
- [Policy TO1 Tourism Development in the Countryside](#)
- [Policy EN2 Special Landscape Areas](#)
- [Policy EN6 Important Biodiversity and Geodiversity Sites](#)
- [Policy EN7 Important Natural Features](#)
- [Policy EN8 Pollution and Land Stability](#)
- [Policy TR2 Design and Access of New Development](#)
- [Policy BE1 Design](#)

Supplementary Planning Guidance:

The following SPG is of relevance to this application: -

- [Parking Standards](#) (October 2016)
- [Design](#) (July 2017)

- [Biodiversity and Geodiversity \(May 2018\)](#)

All of the above SPG can be viewed on the [Council's website](#).

Analysis of Proposal

From the information provided, it appears that your enquiry relates to the potential for the change of use of agricultural land to provide a 12-pitch campsite and associated shower-block facilities. The main issues are summarised as follows:

Principle of Development

It is noted that the application site is located outside settlement limits and within the open countryside. Policy SC1 (detailed below) does, however, specify that 'sustainable tourism' would be acceptable development within the open countryside. Policy SC1 states:

"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".

It should be noted that Policy SC1 (point 8) is directly related to Policy TO1 which states:

“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;*

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”.

Whilst the principle of new tourist accommodation/facilities would be generally acceptable in terms of the above Policies, you would need to ensure that in support of any planning application a sufficiently detailed Planning Statement is provided to address Points 1-3. In respect of Point 1 specifically, we would normally expect information such as a business plan. However, sensitive information such as this would remain/marked confidential on the planning file. I would also advise that I have discussed the proposal with our Tourism Officer who has advised that the recent bed stock survey shows that there is limited provision within the County in relation to camping and caravanning accommodation. Coupled with the recent trends which have seen an increase in demand for this type of accommodation across Wales and the UK (fuelled by the pandemic and the rise in campervan ownership), they have advised that a development of this type would be beneficial to attracting overnight visitors to the area.

In addition to the above, it is noted that part of the application site crosses into the Vale of Neath Special Landscape Area (Policy EN2). This states:

“In order to protect areas of high landscape quality, the following Special Landscape Areas are designated:

Reference	Special Landscape Area
EN2/1	Mynydd y Garth
EN2/2	Dulais Valley
EN2/3	Vale of Neath
EN2/4	Margam
EN2/5	Mynydd y Gelli
EN2/6	Foel Trawsnant

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”.

As it appears that it is the access tracks that would be within the Special Landscape Area, the proposal should be able to comply with this Policy. However, you would need to address this within your Planning Statement detailed above.

Visual Amenity

It is noted that the application site is located within the open countryside. However, due to the nature of the proposal, it is noted that the only ‘building’ would be the shower/toilet block. Given the relatively small scale of this building, and provided it is finished with a suitable colour/materials for a rural building (e.g. timber cladding or green metal), it is considered that the overall development is unlikely to have a detrimental impact in terms of visual amenity.

Residential Amenity

Due to the remote location of the application site, the proposal is unlikely to have any unacceptable issues in terms of overlooking, overbearing or overshadowing. Furthermore, there are unlikely to be any overriding issues in terms of noise and disturbance.

Highway and Pedestrian Safety

The Highways Officer has looked through the submitted details and advises that the proposed campsite is accessed from the adopted highway at Wenallt Road, then via a track leading to the application site. The access track is well maintained and hard surfaced with an approximate width of 4 metres, with sporadic passing areas along its length. Therefore, they offer no highway objection, in principle, to the proposed 12 pitch campsite and associated facilities. However, this is subject to the appropriate parking provision being provided within the curtilage of the campsite in line with NPTCBC – Parking Standards (October 2016). Furthermore, a suitable turning facility within the campsite shall be provided to allow all vehicles to both enter and leave the site in a forward gear.

Biodiversity

As identified above, Policies EN6 and EN7 will be of relevance insofar as there is a need to ensure any impacts on biodiversity/natural features are appropriately assessed and, where applicable, mitigated.

The Biodiversity Officer has looked through the submitted details and advised that the site looks like improved grassland so is unlikely to be of high Biodiversity interest. Nevertheless, they would require the submission of a Preliminary Ecological Assessment (PEA) to identify exactly what is on site and, if identified by the (PEA), any further surveys as required. In addition, they have advised that details of biodiversity enhancement measures in line with Planning Policy Wales 11 and Section 6 of the Environment (Wales) Act 2016 should be submitted in support of any planning application. Such details could include wildlife-friendly planting or artificial nesting boxes etc.

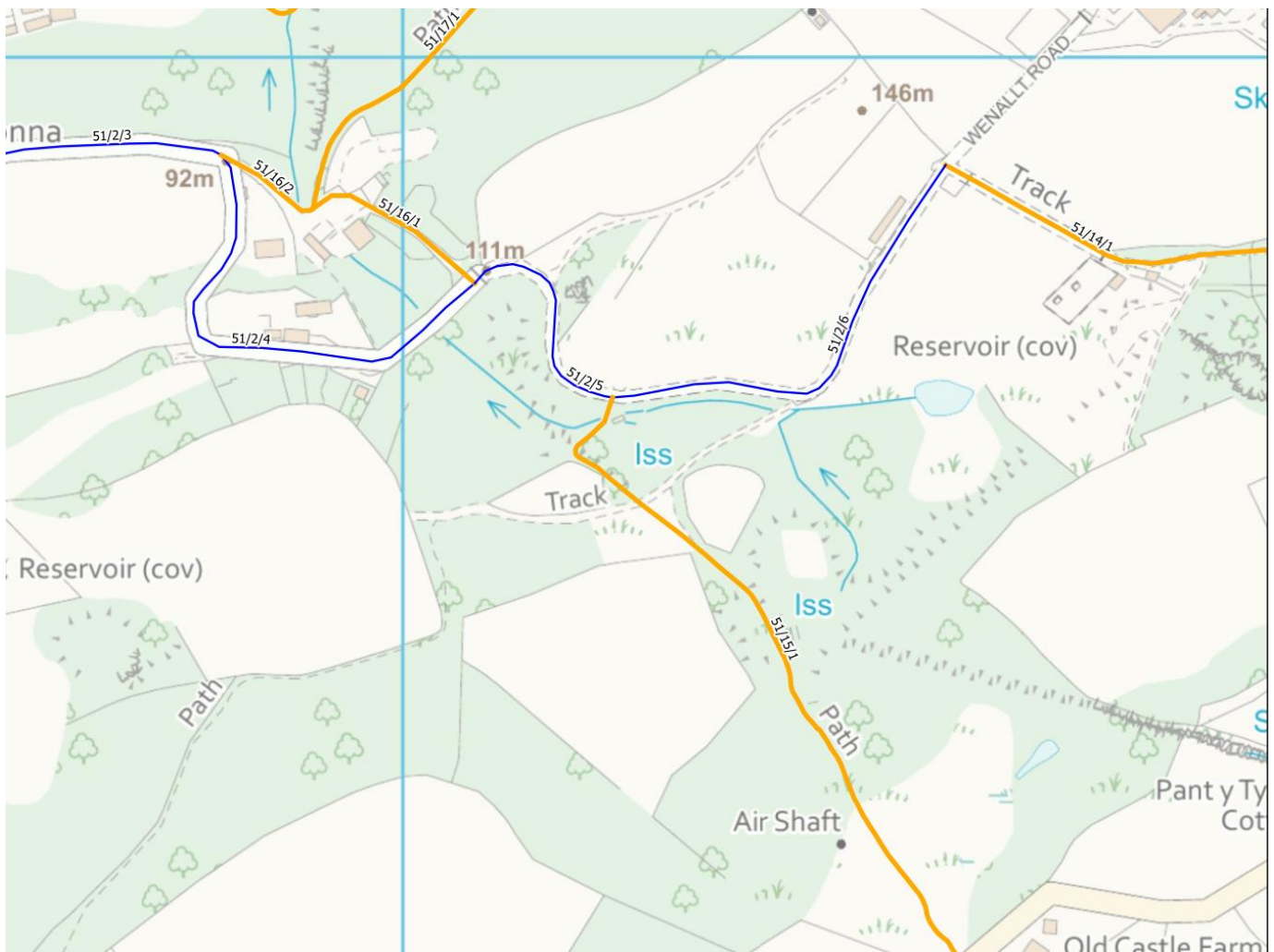
I would also note that if further more specific surveys (e.g. bird surveys, reptile surveys) are required following the PEA, you will need to factor this into your timescales as certain surveys can only be undertaken in specific 'seasons'.

Public Rights of Way

It should be noted that Footpath 15 crosses the application site, as indicated on the plan below. The Rights of Way Officer has advised the following:

"The Public Right of Way shall be protected at all times and any damage caused to the Right of Way shall be rectified to the satisfaction of this authority. No alteration or change of condition to the PROW is to be undertaken without further consultation with the Countryside Team".

I would also advised that the route of the PROW should be protected and no development shall be undertaken along its route, as any potential diversions are a very complicated and lengthy process and there is no guarantee of success.



In addition to the above advice, you may wish to contact Natural Resources Wales (NRW) or Dŵr Cymru Welsh Water (DCWW) to seek further pre-application advice – see note below for details of their pre-application services.

Sustainable Drainage – Statutory Requirements w.e.f January 2019

Please note that all new developments of more than 1 house or where the construction area is of 100m² or more will require sustainable drainage - built in accordance with mandatory standards for sustainable drainage published by Welsh Ministers - to manage on-site surface water. More information is available in [Schedule 3 of the Flood & Water Management Act 2010](#).

These systems must be approved by the Council's Engineering Service acting in its SuDS Approving Body (SAB) role **before construction work begins**. In this respect it is essential that a developer of any such project gain SAB approval of its surface water drainage alongside any relevant planning permission. **You will not be allowed to start construction until both permissions have been approved.**

If you have not done so already, and your development would not fall into any of the relevant exceptions¹, you are therefore strongly encouraged to request further advice from the SAB. Involving the SAB Officers in pre-application discussions will allow for SuDS drainage matters (to ensure suitability of proposed SuDS design in line with national standards and adequate site layout) to be considered alongside the assessment of planning merits. **There is an additional charge of £250 for this service.** This can be as part of any agreed further pre-application submissions with the Planning Authority (recommended) or independently/ direct with the SAB. You are advised, however, that failing to engage in joint pre-application discussions has the potential to lead to delays and, most notably, the potential need to obtain further planning permission should any agreed SuDS design not be compliant with any relevant planning permission. Further details are available at www.npt.gov.uk/planning.

Major Developments

Please be aware that as a 'major' development there is now a statutory requirement (introduced by s17 of the Planning (Wales) Act 2015) for the applicant / developer to consult the community and relevant statutory consultees in advance of formal submission of an application.

Please note that a major application cannot be validated until such consultation is undertaken and a Pre-Application Consultation (PAC) Report submitted with the application.

Best practice guidance for developers on Pre-application Community Consultation can be found on the [Welsh Government website](#).

¹ Exceptions and exemptions, in summary, relate to:-

- Existing sites and developments with planning permission granted or deemed to be granted (whether or not subject to any conditions as to a reserved matter) or for which a valid application has been received but not determined by 7 January 2019. However, SAB approval will still be required if the planning permission was granted subject to a condition as to a reserved matter and an application for approval of the reserved matter is not made before 7 January 2020.

Required Supporting Documentation

We would encourage you to submit your application electronically via www.gov.wales/planningapplications.

Having regard to the nature of your proposal, it is considered at this stage that in addition to the submission of standard mandatory supporting documentation such as application forms, plans and fee, any application for the above development should also be accompanied by the following additional documentation: -

- Pre-Application Consultation (PAC) Report ('Major' development).
- Contaminated Land Desk-top Assessment.
- Coal Mining Risk Assessment – Please be advised that the site is located within a High Risk Area. However, as the application relates to the change of use with two-small shower blocks, this *may* be considered exempt from the requirement for a CMRA provided that there are no significant ground-works involved. You are advised to contact the Coal Authority directly to discuss their requirements prior to the submission of the application – see note below for their contact details. It is unclear from the submission if the washrooms would be 'portacabin' style buildings or permanent brick-build structures with foundations.

If any subsequent application fails to include the information above, there is a chance it may not be registered and, in any event, it is likely that an application will either be refused or will not be able to be progressed until its satisfactory submission.

It is also this Authority's practice to recommend to applicants that detailed information is submitted at application stage to ensure that, in the event of planning permission being granted, that 'pre-commencement' conditions (which require approval of details prior to work starting on site) can be minimised. You are therefore encouraged to ensure that your initial submissions incorporate as much information as possible (for example materials, boundary treatment, ecology mitigation, Construction Management Plan, Travel Plan etc.), and address all matters raised in the advice given above.

Detailed guidance on the use of the national standard application form for planning permission and other associated consent regimes; and the information which must accompany a planning application so that the local planning authority can determine the validity of the application, can be found as follows: -

“Guidance on the use of the standard application form ('1app') and validation of applications”:
<http://wales.gov.uk/topics/planning/policy/guidanceandleaflets/1appguidance>

The Town and Country Planning (Development Management Procedure)(Wales) Order 2012: http://www.legislation.gov.uk/wsi/2012/801/contents/made/original_order.
(Note subsequent Amendment Orders: [2014](#) ; [2015](#) ; [2016](#) ; and [2017](#)).

How we will deal with your planning application

As part of its emphasis on 'Delivering Quality Development Quickly', the Planning department prides itself on the service it offers our customers. Once your application has been received, this will include an allocated case officer making contact with you or your appointed agent within the first week and arranging a visit, following which we will contact you by phone or email to advise of

any discrepancies with your application. We will also work with you to address any outstanding concerns, including any amendments required to make your proposal acceptable.

Once we are happy with the validity of your application, we will formally consult neighbours and relevant consultees. Provided there are no significant matters of concern resulting from such consultations, we will then seek to determine your application as swiftly as possible after the expiry of the statutory publicity period, and aim to do so within the 8 week statutory period.

While Officers will endeavour to ensure you are aware of the progress of your application, we would encourage you to contact the case officer should you wish to discuss any matter further.

Development Team Approach – Building Control

The Development Management and Building Control teams work closely to assist developers in improving the quality of their development and ensuring compliance with all appropriate conditions and Regulations. In particular, Building Control provide a competitive and highly professional service and seek to actively engage with developer's at the earliest stage of their project. You are therefore encouraged to contact the Building Control team on 01639 686820 or by emailing building.control@npt.gov.uk to enter into early negotiations and understand the benefits of the Council's Development Team approach.

Requests for Further Advice

Following receipt of this initial advice, should you wish to discuss your scheme prior to formal submission, please contact the case officer on the direct number or email address given above. Further charges may apply.

Yours faithfully

Russell Borthwick

If you require this information in larger print, or in an alternative format, please contact the above named officer.

Seeking Pre-Application Advice from External Consultees

Natural Resources Wales (NRW)

Natural Resources Wales has a key role in the planning system and you may wish to hold pre-application consultation with them, utilising their pre-application service, so that environmental considerations are identified and addressed at the earliest opportunity. More information about Natural Resources Wales's pre-application service, including what advice can be sought for free, and what advice is subject to a fee can be found at:

<https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/advice-for-developers/our-service-to-developers/?lang=en>

Dŵr Cymru Welsh Water (DCWW)

Dŵr Cymru Welsh Water has a key role to play in the development and planning process as the services provided are at the forefront of public health and protection of the environment. Dŵr Cymru encourages all developers to engage with them as early as possible in order to address any issues that may arise during the planning/construction process.

To assist, Dŵr Cymru operates a pre-planning service in order to assess the impact of the proposed development. A written response will be provided advising whether the local network(s) can support the proposal, whether off-site water mains and/or sewers will need to be provided, and whether there are any apparatus located within the land you wish to develop and the requirements for these apparatus. This service is provided for a fee of £155+ VAT and can be submitted by post or by completing the online enquiry form at <http://www.dwrcymru.com/en/Developer-Services>. Further information can be obtained from the dedicated team of planning officers on 0800 917 2652.

Coal Authority

In line with many other statutory consultees, the Coal Authority no longer provides responses to pre-application enquiries without a charge. The Coal Authority therefore requests LPAs to direct applicants that are seeking pre-application advice regarding coal mining legacy issues because their site falls within the Development High Risk Area to them, so they may provide a quotation for providing advice.

Should only a small part of your site fall within the High Risk area, we would especially encourage you to engage with the Coal Authority, since they may advise in certain situations that a Coal Mining Risk Assessment is not required.

Further advice may be found at: <https://www.gov.uk/government/organisations/the-coal-authority>