

# PLANNING STATEMENT

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## **Gnoll Estate Country Park Kitchen Garden & former Pump House Service Yard**

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October 2023



# Summary

**Proposal:**

Holiday accommodation and associated works to the Kitchen Gardens and the former Pump House Service Yard

**Location:**

Gnoll Estate Country Park, Fairyland, Neath, SA11 3BS

**Date:**

October 2023

**Project Reference:**

S23.117

**Client:**

Head of Property and Regeneration for Neath Port Talbot County Borough Council

**Product of:**

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## Introduction

- 1.1 This planning application has been prepared on behalf of The Head of Property and Regeneration at Neath Port Talbot County Borough Council (NPTCBC) for the proposed development comprising the proposed creation of visitor accommodation with associated works within the existing kitchen garden area at Gnoll Estate Country Park, Fairyland, Neath, SA11 3BS.
- 1.2 This application is one of several applications being made within the Country Park. The wider proposals have been supported by Levelling Up Funding (LUF) from Welsh Government which *"is especially intended to support investment in places where it can make the biggest difference to everyday life, including ex-industrial areas, deprived towns and coastal communities."* It has been introduced to help local areas identify real local priorities for investment. The scheme aims to utilise the LUF to create an attractive environment, heritage and tourism proposition that will benefit the Country Park along with the wider area, making it a highly desirable destination with many economic benefits.
- 1.3 The aim of this Planning Statement is to offer a clear and logical document to outline the planning considerations and planning policies pertinent to the application. The document also acts as a method of representing the details of the planning application in a way that can be read both by professionals and the public.
- 1.4 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            |
|-------------------------------------|------------------------------|
| Existing Site Plan – Service Yard   | 2080-04-HIR-A-DR-00020-S2-P2 |
| Existing Site Plan – Kitchen Garden | 2080-04-HIR-A-DR-00021-S2-P2 |
| Existing Tree Constraints Plan      | 2080-04-HIR-A-DR-00022-S2-P3 |
| Existing Tree Removal Plan          | 2080-04-HIR-A-DR-00024-S2-P2 |
| Existing Location Plan              | 2080-04-HIR-A-DR-00025-S2-P2 |
| Demolitions Site Plan               | 2080-04-HIR-A-DR-00100-S2-P2 |
| Proposed Site Plan – Kitchen Garden | 2080-04-HIR-A-DR-00201-S2-P8 |
| Proposed Site Plan – Service Yard   | 2080-04-HIR-A-DR-00202-S2-P3 |

|                                                           |                              |
|-----------------------------------------------------------|------------------------------|
| Proposed Cabin (Type A) Plans                             | 2080-04-HIR-A-DR-01312-S2-P4 |
| Proposed Cabin (Type B) Plans                             | 2080-04-HIR-A-DR-01313-S2-P4 |
| Proposed Potting Sheds (D1/2 and E3)<br>Ground Floor Plan | 2080-04-HIR-A-DR-01314-S2-P4 |
| Proposed Laundry/Servicing (E1) Plan                      | 2080-04-HIR-A-DR-01315-S2-P4 |
| Proposed Store/Workshop (E2) Plan                         | 2080-04-HIR-A-DR-01316-S2-P3 |
| Proposed Cabin (Type A) Elevations                        | 2080-04-HIR-A-DR-02402-S2-P3 |
| Proposed Cabin (Type A) Elevations                        | 2080-04-HIR-A-DR-02403-S2-P3 |
| Proposed Cabin (Type B) Elevations                        | 2080-04-HIR-A-DR-02404-S2-P3 |
| Proposed Cabin (Type B) Elevations                        | 2080-04-HIR-A-DR-02405-S2-P4 |
| Proposed: Potting Sheds D1 & D2 N/S<br>Elevations         | 2080-04-HIR-A-DR-02406-S2-P2 |
| Proposed: Potting Sheds D1/2, E3 E/W<br>Elevations        | 2080-04-HIR-A-DR-02407-S2-P2 |
| Proposed E1 Laundry/Servicing N/S<br>Elevations           | 2080-04-HIR-A-DR-02408-S2-P2 |
| Proposed E1 Laundry/Servicing E/W<br>Elevations           | 2080-04-HIR-A-DR-02409-S2-P2 |
| Proposed E2 Store/Workshop E/S<br>Elevations              | 2080-04-HIR-A-DR-02410-S2-P2 |
| Proposed E3 Reception/Office<br>Elevations                | 2080-04-HIR-A-DR-02411-S2-P2 |
| Landscaping Plan                                          |                              |
| Drainage Layout                                           | 2080-04-JUB-C-DR-00504-S2-P2 |
| Vehicle Tracking                                          | 2080-04-JUB-C-DR-00903-S2-P1 |
| Lighting Plan                                             | 2080-04-MCP-E-DR-9400        |

- 1.5 In addition, the following supporting documents have been submitted.

| <b>Document name (reference where appropriate)</b> | <b>Prepared by</b>   |
|----------------------------------------------------|----------------------|
| Planning application forms (1APP)                  | Asbri Planning       |
| Planning Statement                                 | Asbri Planning       |
| PAC Report                                         | Asbri Planning       |
| Project Context Statement                          | Hiraeth Architecture |

|                                                                    |                      |
|--------------------------------------------------------------------|----------------------|
| Design and Access Statement (including Heritage Impact Assessment) | Hiraeth Architecture |
| Transport Statement                                                | Asbri Transport      |
| Historic Environment Desk Based Assessment                         | DAT                  |
| Written Scheme of Investigation                                    | DAT                  |
| Bat Survey Report                                                  | NPTCBC Ecology       |
| Tree Report                                                        | NPTCBC               |
| Tree Survey                                                        | NPTCBC               |
| Drainage Strategy                                                  | Jubb                 |
| Non-Mains Drainage Assessment                                      | Jubb                 |
| Ground Conditions Assessment Report                                | Jubb                 |
| Best Practice Repairs Summary - Kitchen Garden                     | Jubb                 |
| Stone wall condition summary – Kitchen Garden                      | Jubb                 |
| Coal Mining Risk Assessment                                        | ESP                  |
| Construction Environmental Management Plan                         | Andrew Scott         |

- 1.6 In terms of the content of this Planning Statement, this chapter is followed by a site description and its features which includes a contextual analysis regarding the local character and nearby land uses and review of planning history. Next, Chapter 3 offers an outline of the proposed development. Subsequently, Chapter 4 provides a summary of the relevant national and local planning policies which provide the framework for appraising the proposed development. Meanwhile, Chapter 5 pulls together the vital points and conclusions from the supporting technical documents to demonstrate the overall suitability of the proposal in planning terms. To conclude, Chapter 6 states why the proposal should be granted planning permission.

## Site Description and Context

### General Location

- 2.1 The application site lies within the wider Gnoll Estate Country Park in Neath. The Country Park is a grade II\* registered historic Park and Garden which sits on a steep sided hill at the eastern end of Neath. The Park has retained its rich history by telling the story of the Mackworth family through the existing features still situated within the Park that include four large duck ponds, two 18th century cascades and the Gnoll House ruins.
- 2.2 Figure 1 below demonstrates the Country Park's location (identified by red circle) within the wider surrounding area. A site location plan has been produced for this and other applications, showing both a red line plan and blue line highlighting the land which is in the applicant's ownership.

*Figure 1: Site Location (Source: OS Map online)*



### Site Features

- 2.3 The wider site itself is circa 5 hectares, and contains a visitor centre with café and toilet facilities, a children's playground, a fishpond, formal cascades and bridge, and waterfall and stream. There are several footpaths lying within the site which are used by visitors, and there are also three Grade II listed buildings within the site boundary:
- The Mosshouse Wood Cascades;
  - The Grotto; and
  - The War Memorial.

- 2.4.1 The wider site's immediate surroundings to the north, south and west are mostly residential, whereas east lie several fields of grassland and trees. To the west of the site lies Neath town centre, where there are a range of facilities and services:
- Gnoll Country Park;
  - Neath Leisure Centre,
  - Neath Train Station;
  - Gwyn Hall;
  - Supermarkets;
  - Public House;
  - Pharmacy;
  - Dentist; and
  - Victoria Gardens
- 2.5 The entire application site lies within Zone A in the Natural Resources Wales (NRW) Development Advice Map. The Flood Map for Planning places some parts of the site within Flood Zones 2 and 3 for surface water and small watercourses.
- 2.6 A review of CADW's shows there are three grade II listed buildings within the site curtilage as outlined in Paragraph 2.3. As previously noted, the Country Park is a Grade II\* listed designated Parkland, with it registered due to the survival of its largely eighteenth-century landscape Park, which has significant historic interest, in its original rural setting above the town of Neath.
- 2.7 The Coal Authority's Interactive Map reveals some of the land to the west of the fishpond is within a Coal Mining Development High Risk Area.
- 2.8 Within the Neath Port Talbot County Borough Council Local Development Plan (2011-2026) Proposals Map, the following policies are applicable to the site:
- Policy SP5 – Coastal Corridor Strategy Area;
  - Policy EN3 – Green Wedge;
  - Policy SP21 – Built Environment and Historic Heritage;
  - Policy M1 – Development in Mineral Safeguarding Area; and
  - Policy M2 – Surface Coal Operations

### **Individual Application Site**

- 2.9 Application 3 – Kitchen Garden and Service Yard:  
The application site for the purpose of this application site consists of the existing service yard shown in Figure 2 and the former area known as the Kitchen Garden. The kitchen gardens are located to the east of the pleasure grounds, to land that sits South West of Pond Cottage, which was formerly the Park Ranger's house. There are a number of structures in this area including a free-standing stone wall

that defines the northern boundary, and a sizeable retaining wall to the west. The focus of the area is three buildings that until recently were used to service the wider park. These form a U-shaped group around a central courtyard space. Adjacent to the northern boundary wall, the ground rises to the west via a track to a higher plateau to the west of the collection of buildings.

The kitchen gardens currently comprises a mix of poorly maintained asphalt, derelict buildings, temporary container units and areas of scrub/ vegetation. Refer to ecology report for further detail on the value of the vegetation on site.

*Figure 2: Service Yard Area*



### **Access**

- 2.10 The Kitchen Gardens and Service Yard are directly accessed by vehicles from the south, via a steeply inclined, tarmac road, which leads up from Cimla Road and the residential area below. This road is an unadopted highway, referred to as 'Gnoll Access Road West'. The site is also well-linked to the main network of footpaths within the park from the north.
- 2.11 The site is less than two miles away from the Heads of the Valleys Road (A465), a trunk road that runs from Junction 43 of the M4 at Llandarcy to Bromyard in Herefordshire. It is 66 miles in total and connects settlements including Neath, Abergavenny, Merthyr Tydfil and Hereford. Junction 43 of the M4 is only a 10 minute drive away, which offers access to several destinations within South Wales and across the border in England.

- 2.12 The site is positioned in a sustainable location, with several bus stops in close proximity to the site. The nearest bus stop lies just before the main entry to the site along Fairyland. This stop is serviced by the 153 on a two hour basis, terminating at Neath bus station. Neath bus station is in the town centre, and has services heading to several destinations including Swansea, Skewen, Margam, Pontardawe and Brecon.
- 2.13 Neath Train Station is less than ten minutes away from the application site. Hourly services are operated by Great Western Railway travel between Swansea and London Paddington in both directions. Transport for Wales services also call at the station, with their services terminating at destinations including Manchester Piccadilly, Cardiff Central, Carmarthen and Milford Haven.
- 2.14 Running to the north of the site is national cycle route 47 which goes from Newport to Fishguard and forms part of the Celtic Trail West. The route itself is 121 miles long and over half of it lies in traffic free paths.

### Planning History

- 2.15 A review of Neath Port Talbot's online planning history identifies the following planning history of importance relating to the site which dates back to 1993.

| LPA Reference | Proposal                                                                                                                | Decision                            |
|---------------|-------------------------------------------------------------------------------------------------------------------------|-------------------------------------|
| N1993/0394    | De-siting first, fish and guinea ponds, and watercourse. New road and car park, visitor centre, playground, golf course | Approved<br>25/10/1993              |
| N1993/0416    | Visitor Centre for information and leisure purposes                                                                     | Approved<br>25/10/1993              |
| N1993/0535    | Visitor Centre                                                                                                          | Approved<br>06/12/1993              |
| N1993/0537    | General refurbishments including new access steps                                                                       | Approved<br>20/12/1993              |
| N1994/0012    | Removal of condition 4 and 5 application no. 93/394 and construction of footpath from Fairyland to car park             | Approved<br>07/03/1994              |
| N1994/0436    | Modification to car parking area adjacent to first pond as approved on 2/3/93/0394/11                                   | Approved<br>19/09/1994              |
| P1997/0491    | Renovations and improvements to Pond Cottage                                                                            | Permitted Development<br>13/06/1997 |

|                   |                                                                                                                            |                                                                          |
|-------------------|----------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------|
| <i>P2014/0598</i> | <i>Prior notification for demolition of classroom building.</i>                                                            | <i>Prior Notifica-<br/>tion Approval<br/>Not Required<br/>18/07/2014</i> |
| <i>P2017/0312</i> | <i>Extension to existing children`s<br/>playground</i>                                                                     | <i>Approved<br/>20/06/2017</i>                                           |
| <i>P2022/1055</i> | <i>Installation of 8m high multi play<br/>tower/equipment (to replace existing<br/>play apparatus/thick climbing unit)</i> | <i>Approved<br/>01/02/2023</i>                                           |

## Proposal

- 3.1 The proposal seeks full planning permission for creation of visitor accommodation and associated works within Kitchen Gardens and Associated Former Pump House Service Yard area within Gnoll County Park.
- 3.2 The proposal itself consists of the following:
- Opening up and re-landscaping of former kitchen gardens;
  - Repair and consolidation of historic garden walls alongside construction of new walls/timber screens;
  - Reconstruction of former potting sheds to offer 2 no. self catering units and office/reception building for proposed holiday accommodation;
  - Construction of 14 accommodation cabins;
  - Construction of support building to house linen store, gardener/volunteer welfare room and shared laundry area for visitors;
  - Demolition of existing garage building and replace with new building to house workshop space and garden tool/machinery store set within dedicated yard
  - 24 parking spaces to be provided within pumphouse service yard.
- Further details over the precise nature of the repairs and consolidation works can be found in the accompanying Design and Access Statement produced by Hiraeth Architecture, along with the Best Practice Repairs Summary written by Jubb.
- 3.3 The aim of the proposal is to manage the neglected kitchen garden area by installing high quality accommodation for visitors to stay in overnight. The aspiration is to tie the kitchen garden and service yard together so that they can have a beneficial impact upon the wider Parkland.
- 3.4 The proposals have focused on creating a balance between maximising capacity and a desire to craft positive external spaces integrated into the scheme based upon historical precedents. The holiday lodges have been designed with creating a private outdoor terrace for each one, which focuses their outlook and connection on external planting and areas of landscaping.
- 3.5 This aspect of the LUF bid has undergone detailed design, with two options originally tabled, one included converting Pond Cottage into self-catering accommodation whereas the other proposed turning Pond Cottage into a tea room. The second option involving a tea

room also permitted the addition of more holiday cabins. Following consultation with Cadw and the formal pre-application consultation process, it was decided that Pond Cottage would be turned into a team room (Please refer to the Pond Cottage application for further details), and therefore would be separated from this application due to its alternative proposed function.

- 3.6 Both types of cabin accommodation have historical reference to the Park, with Type A referencing the back of house potting shed structures positioned to the north and east of the garden walls, whereas Type B has been designed with reference to the glass houses located to the south and west of the garden walls.

### **Design**

- 3.7 This section addresses the five objectives of good design which include access, character, environmental sustainability, movement and community safety. This is expanded upon further in the Design and Access Statement produced by Hiraeth Architecture.

### **Access**

- 3.8 For the kitchen garden accommodation, only four drop-off/accessible parking bays will be provided whereas the majority of parking spaces will be provided in the former service yard. These spaces are a short walk from the holiday lodges, making them easily accessible. Access for vehicles and pedestrians to the lodges will be available from Cimla Road lying to the south west. The road leading to the site is used infrequently, with it currently used for authorised deliveries and pedestrian access typically. The development will maintain the restricted use associated with the road, only permitting those who have pre-booked to say in the accommodation to use this route. Moreover, proposed enhancements to path surfacing will assist accessibility of the site, whereas two of the holiday lodges are fully accessible and are located near to the access point and reception.

### **Character**

- 3.9 The proposal aims to respect the character of the unoccupied kitchen garden whilst respecting the existing service yard character of the former pump house service yard. The kitchen garden area has been respected in terms of orientation and archival research to generate distinct areas of productivity along with zones for holiday accommodation.

### **Environmental Sustainability**

- 3.10 The scheme aims to address sustainability matters by adopting an approach that addresses the following matters:
- Reduce construction impact;

- Reduce operational energy use;
- Increase renewable energy supply; and
- Offset any remaining carbon.

3.11 In order to achieve the above sustainability aspirations, the following measures are proposed:

- Locally sourced materials will be used in the construction period;
- Low carbon construction materials/systems will be utilised as part of the construction solution;
- Reducing the sum of energy used by buildings;
- Make the most of free gains that are available on site;
- New trees and a detailed a landscaping scheme will be provided.

### ***Movement***

3.12 A key aspect of any development is for the site to be accessed by numerous types of transport. Throughout this document, it has been emphasised that the site is well situated for public transport and active travel needs which permit access to nearby facilities and settlements, and wider areas of NPTCBC. The site is positioned in a sustainable location, with several bus stops in close proximity to the site. The nearest bus stop lies just before the main entry to the site along Fairyland whereas Neath Train Station is less than a ten minute drive from the application site. Running to the north of the site is national cycle route 47 which goes from Newport to Fishguard and forms part of the Celtic Trail West.

### ***Community Safety***

3.13 Community safety will be improved through its meaningful use as holiday accommodation, rather than leaving it remain unoccupied. By having visitors and tourists staying on site, it will encourage natural surveillance of the site. The lighting scheme produced by McCann and Partners will improve safety and visibility in the area.

### ***Pre-Application Consultation***

3.14 Hiraeth Architects and NPTCBC undertook a public consultation event at Gnoll Estate Country Park Visitor Centre, which displayed all information included in the Stage 1 Levelling Up Funding document. A formal pre-application consultation took place between 18th May 2023 and June 15th 2023, with site notices displayed on site, letters sent to statutory, other and community consultees, along with adjoining residents. In addition to this, a response desk was set up in the visitor centre. Further information concerning the pre-application process and the responses gathered can be found in the submitted PAC Report.

# Planning Policy Context

## Introduction

- 4.1 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 County Borough Council Local Development Plan. National Planning Policy is largely contained within Planning Policy Wales (PPW) – 11th Edition, published by the Welsh Assembly Government on February 2021. PPW is supplemented by 19 Technical Advice Notes (TANs), the relevant TANs will also be discussed within this chapter.
- 4.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the purposes of this Planning Application comprises the following:
- National Development Framework: Future Wales – The National Plan 2040 (February, 2021);
  - Neath Port Talbot County Borough Council Local Development Plan (January, 2016)
- 4.3 In addition to the Development Plan, the Planning Application has been informed by policy and guidance set out in the following:
- Planning Policy Wales Edition 11 (February, 2021), informed by The Well-Being of Future Generations (Wales) Act 2015, and supplemented by Technical Advice Notes;
  - Neath Port Talbot County Borough Council Supplementary Planning Guidance; and
  - Managing Change to Registered Historic Parks and Gardens in Wales (Cadw Guidance published in 2017)

## National Level

### The Well-Being of Future Generations (Wales) Act 2015

- 4.4 The Well-Being of Future Generations (Wales) Act 2015 (which came into force on 1st April 2016) requires *"public bodies to do things in pursuit of the economic, social, environmental and cultural well-being of Wales in a way that accords with the sustainable development principle"*. The Act sets out seven 'well-being' goals as follows:
- A prosperous Wales: An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the

wealth generated through securing decent work.

- A resilient Wales: A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).
- A healthier Wales: A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.
- A more equal Wales: A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).
- A Wales of cohesive communities: Attractive, viable, safe and well-connected communities.
- A Wales of vibrant culture and thriving Welsh language: A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.
- A globally responsive Wales: A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global wellbeing.

- 4.5 Within the Act, sustainable development is defined as follows: *"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"*. The Act sets out that when making decisions, public bodies need to take into account the impact they could have on people living in Wales in the future and must apply the sustainable development principle in all decisions.

#### **National Development Framework: Future Wales – The National Plan 2040**

- 4.6 The National Development Framework: Future Wales – the National Plan 2040 was published on 24th February 2021. 'Future Wales' sets out the Welsh Government's 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. As stated above, the National Development Framework has Development Plan status.

- 4.7 Future Wales sets out its overarching ambitions based on the na-

tional planning principles and national sustainable placemaking outcomes set out in Planning Policy Wales by means of 11 Outcomes.

As set out on Page 52 of Future Wales, the 11 Outcomes are collectively a statement of where the Welsh Government aspire Wales to be in 20 years' time, as follows:

*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*

- 4.8 The Welsh Government's strategic growth strategy is set out in Policy 1 of Future Wales as follows:

*Policy 1 – Where Wales will Grow*

*The Welsh Government supports sustainable growth in all parts of Wales. In three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas are:*

- *Cardiff, Newport and the Valleys*
- *Swansea Bay and Llanelli*
- *Wrexham and Deeside*

- 4.9 It is identified at Page 76 that the strategic focus of Future Wales on urban growth requires "an increased emphasis on biodiversity enhancement (net benefit) in order to ensure that growth is sustainable" (page 76).

- 4.10 Policy 9 of Future Wales is of key relevance in regard to green infrastructure and biodiversity enhancement, which states the following:

*Policy 9 – Resilient Ecological Networks and Green Infrastructure*

*To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to:*

- *identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation,*
- *to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and*
- *identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being.*

4.11 Future Wales identifies that transport in Wales is currently dominated by the car and that *"our reliance on travelling by car is limiting the opportunity for physical activity and social contact to be built into people's everyday lives and is exacerbating air and noise pollution, particularly along major routes and at busy destinations...This has an adverse impact on people's health and well-being, contributing to life-limiting illnesses associated with physical inactivity, loneliness and isolation"* (page 85).

4.12 The importance of the implementation of policies which require development to be directed towards sustainable locations and designed to make it possible for everyone to make sustainable and healthy travel choices is highlighted in Future Wales, and it is stated that planning authorities will be required *"to refuse planning permission for car-dependent developments which would otherwise encourage car use and undermine sustainable travel"* (page 85).

4.13 Policy 28 (National Growth Areas - Swansea Bay and Llanelli) of Future Wales is also of relevance, as it states that Swansea Bay and Llanelli will be the main focus for growth and investment in the South West region. This national growth area is considered as the hub for economic and housing growth.

#### **Planning Policy Wales (Edition 11) –**

4.14 Planning Policy Wales (PPW) sets out land use planning policies of the Welsh Government which 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.

4.15 Its primary objective 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.

- 4.16 Sustainable Development is defined at Page 7 of PPW as follows: *"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"*.
- 4.17 Paragraph 1.18 sets out that *"Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated"*.
- 4.18 The significance of good design for development proposals is highlighted in Paragraph 3.3 of PPW where it is noted *"Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surrounding area"*.
- 4.19 Paragraph 3.6 notes that development proposals should allow inclusivity and accessibility for everybody. It states *"This includes making provision to meet the needs of people with sensory, memory, learning and mobility impairments, older people and people with young children. There will often be wider benefits to be gained through the sensitive consideration of such provision, for example, whilst the presence of visual cues will be invaluable in assisting those with hearing loss to engage in a noisy environment, a navigable environment will benefit all. Good design can also encourage people to meet and interact with each other, helping to address issues surrounding loneliness. Good design must also involve the provision of measures that help to reduce the inequality of access to essential services, education and employment experienced by people without access to a car. Design measures and features should enable easy access to services by walking, cycling and public transport."*
- 4.20 Design is not only about the architecture of a structure but the relationship amongst every facet of the natural and built environment and between people and places. Furthermore, good design encourages environmental sustainability and contributes towards meeting well-being targets. Paragraph 3.7 states: *"Developments*

*should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement, minimise the use of non-renewable resources, encourage decarbonisation and prevent the generation of waste and pollution. An integrated and flexible approach to design, including early decisions regarding location".*

- 4.21 Paragraph 3.8 discusses good design within an environmental context. It *"can help to ensure high environmental quality. Landscape and green infrastructure considerations are an integral part of the design process. Integrating green infrastructure is not limited to focusing on landscape and ecology, rather, consideration should be given to all features of the natural environment and how these function together to contribute toward the quality of places. This embraces the principles of 'ecosystems services' and sustainable management of natural resources where multiple benefits solution become an integral part of good design. In a similar manner, addressing environmental risks can make a positive contribution to environmental protection and improvement, addressing land contamination, instability and flood risk and providing for biodiversity, climate protection, improved air quality, soundscape and water resources benefits".*
- 4.22 Paragraph 3.9 focuses on how the special characteristics of an area should be fundamental for development design: *"The layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations. A clear rationale behind the design decisions made, based on site and context analysis, a strong vision, performance requirements and design principles, should be sought throughout the development process and expressed, when appropriate, in a design and access statement".*
- 4.23 Paragraph 3.55 notes *"Previously developed (also referred to as brownfield) land (see definition overleaf) should, wherever possible, be used in preference to greenfield sites where it is suitable for development."*
- 4.24 Paragraph 3.75 states *"The construction of new buildings in a Green Belt or green wedge is inappropriate development unless it is for the following purposes:*
- justified rural enterprise needs;*
  - essential facilities for outdoor sport and outdoor recreation, cemeteries, and other uses of land which maintain the openness of the Green Belt or green wedge and which do not conflict with the purpose of including land within it;*

- *limited extension, alteration or replacement of existing dwellings; or*
- *small scale diversification within farm complexes where this is run as part of the farm business."*

- 4.25 Paragraph 4.1.10 highlights that any development should focus on sustainable travel and reduce the reliance on cars, with a particular emphasis on short journeys as these are most frequently made by individuals. *"The planning system has a key role to play in reducing the need to travel, particularly by private car, and supporting sustainable transport, by facilitating developments which:*
- *are sited in the right locations where they can be easily accessed by sustainable modes of travel and without the need for a car;*
  - *are designed in a way which integrates them with existing land uses and neighbourhoods; and*
  - *make it possible for all short journeys within and beyond the development to be easily made by walking and cycling."*
- 4.26 Paragraph 4.1.11 supports the above information, by encouraging development of active travel and sustainable transport infrastructure and services. It notes that *"proposals must seek to maximise accessibility by walking, cycling and public transport, by prioritising the provision of appropriate on-site infrastructure and, where necessary, mitigating transport impacts through the provision of off-site measures, such as the development of active travel routes, bus priority infrastructure and financial support for public transport services."*
- 4.27 Paragraph 5.5.1 notes *"Tourism involves a wide range of activities, facilities and types of development and is vital to economic prosperity and job creation in many parts of Wales. Tourism can be a catalyst for regeneration, improvement of the built environment and environmental protection."*
- 4.28 Paragraph 6.1.2 states *"The historic environment is made up of individual historic features which are collectively known as historic assets. Examples of what can constitute an historic asset include:*
- *Listed buildings;*
  - *Conservation areas;*
  - *Historic assets of special local interest;*
  - *Historic parks and gardens;*
  - *Townscapes;*
  - *Historic Landscapes;*
  - *World Heritage Sites; and*
  - *Archaeological remains (including scheduled monuments)."*

- 4.29 In respect of Historic Park and Gardens, PPW states *"Planning authorities should value, protect, conserve and enhance the special interest of parks and gardens and their settings included on the register of historic parks and gardens in Wales. The register should be taken into account in planning authority decision making. Green Infrastructure Assessments should be used to explore the role of historic parks and gardens and the findings of other landscape character assessments should be fed into historical and cultural assessments to ensure consistency of information."*
- 4.30 Paragraph 6.1.20 states *"The effect of a proposed development on a registered park or garden, or its setting, is a material consideration in the determination of planning applications"*.
- 4.31 The importance of green infrastructure is highlighted throughout PPW. It is summarised at Paragraph 6.2.5 that *"The quality of the built environment should be enhanced by integrating green infrastructure into development through appropriate site selection and use of creative design. With careful planning and design, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places"*.

#### **Technical Advice Notes**

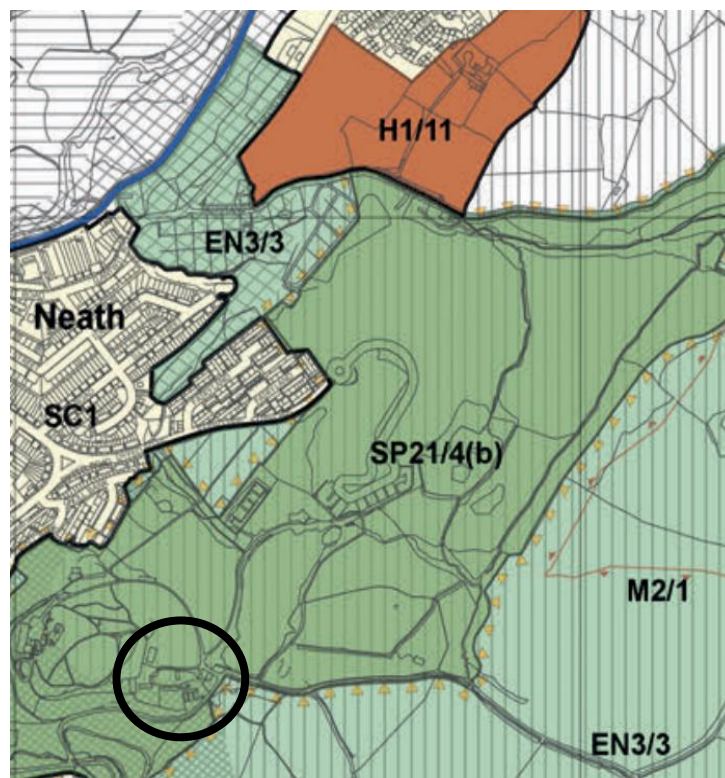
- 4.32 The following Technical Advice Notes (TANS) are of relevance to the development proposal.
- Technical Advice Note 11: Noise;
  - Technical Advice Note 12: Design;
  - Technical Advice Note 13: Tourism;
  - Technical Advice Note 18: Transport; and
  - Technical Advice Note 24: The Historic Environment

#### **Local Level**

##### **Neath Port Talbot County Borough Council Local Development Plan**

- 4.33 The Neath Port Talbot County Borough Council Local Development Plan (LDP) was adopted in January 2016 and is the prevailing development plan for the County. The application site lies outside the settlement boundary relating to Tonna as shown below in Figure 3. From the map, the following LDP policies are applicable to the site:
- M1 - Development in Mineral Safeguarding Areas
  - EN3/3 - Neath / Tonna / Cimla / Efail Fach Green Wedge
  - SP5 - Coastal Corridor Strategy Area
  - SP21/4(b) - Built Environment and Historic Heritage (Historic Parks and Gardens)
  - M2/1 - Surface Coal Operations

Figure 3: NPTCBC LDP Map



4.34 The following LDP policies are considered relevant in the context of the proposed development:

| Policy Reference | Relating To...                                     |
|------------------|----------------------------------------------------|
| Policy SP1       | Climate Change                                     |
| Policy SP2       | Health                                             |
| Policy SP3       | Sustainable Communities                            |
| Policy SC1       | Settlement Limits                                  |
| Policy SP4       | Infrastructure                                     |
| Policy I1        | Infrastructure Requirements                        |
| Policy SP5       | Development in the Coastal Corridor Strategy Area  |
| SP13             | Tourism                                            |
| TO1              | Tourism Development in the Countryside             |
| Policy EN3       | Green Wedges                                       |
| Policy SP15      | Biodiversity and Geodiversity                      |
| Policy EN7       | Important Natural Features                         |
| Policy M1        | Development in Mineral Safeguarding Areas          |
| Policy M2        | Surface Coal Operations                            |
| Policy RE2       | Renewable and Low Carbon Energy in New Development |

|             |                                         |
|-------------|-----------------------------------------|
| Policy TR2  | Design and Access of New Development    |
| Policy SP21 | Built Environment and Historic Heritage |
| Policy BE1  | Design                                  |

### **Supplementary Planning Guidance**

4.35 The following Supplementary Planning Guidance are considered relevant to the proposal:

- Infrastructure Requirements
- Biodiversity and Geodiversity
- Renewable and Low Carbon Energy
- Parking Standards
- Design
- The Historic Environment

### **Cadw Guidance – Managing Change to Registered Historic Parks and Gardens in Wales**

4.36 Cadw produced the above best-practice guidance in order to provide general advice when changes are proposed to impact upon a registered historic Park and Garden. Under Section 2.2 it states that *"it is important to consider the impact of your proposals for change on the significance of your registered historic park or garden before you begin work. In particular, you should beware of the potential cumulative impact of small-scale changes, which individually may seem insignificant."*

4.37 Within the document, the following advice is provided:

- Setting - *When considering change, you should take a holistic approach to understanding its potential impact on setting. The impact of change on any one element may have unintended consequences for the setting if it is not properly considered.*
- Views - *Over time, views can be lost or compromised. This may result from inappropriate planting, incongruous development, or from lack of maintenance which has allowed vegetation to grow and obscure the intended view. Once you have identified the contribution of views to the significance of your registered historic park or garden, you may be able to open up and manage intended views which will enhance the site's historic character and heritage value, as well as your appreciation of it.*
- Archaeology - *Significant archaeological features may be present in a historic park and garden; they may be undesignated or as yet undiscovered. When considering change that may impact on archaeological features you should contact your local planning authority's archaeological advisors for advice.*

- *Layout - It is important that you understand the significant elements of the historic layout of your registered historic park or garden and interpret their evolution. This will help you to make informed and sympathetic management decisions without compromising its historic significance.*
- *Entrances and Routes - Wherever possible, you should keep historic circulation routes open. Information in the register entry and historic map research can help you to understand which routes are significant. If possible, you should avoid creating additional routes which subdivide parkland or alter the historic layout. If a new route is unavoidable or highly desirable, you should give it careful consideration to ensure minimal adverse impact on your registered historic park or garden. If additional routes are required, consider opportunities to open up former historic drives and tracks through the site.*
- *Historic Boundary Features - You should retain historic boundary features where possible and your repairs should use traditional materials and methods. Where possible, avoid additional permanent boundaries in open parkland because they fragment the landscape physically and visually, and alter the historic layout. It is also important to consider the function of the boundary.*
- *Garden Building and Ornaments - Built structures are often vulnerable to damage, decay and neglect. Routine management and maintenance are important to ensure longevity. Your repairs should use sympathetic materials and techniques. They need to be informed by an understanding of the historic structure and its condition. It is advisable to seek advice from an appropriately qualified and experienced professional before repairing historic structures.*
- *Water Features - Like other historic features in your registered historic park or garden, it is essential to understand the significance of water features and associated water management structures before making changes to them.*
- *Planting - Registration does not place any restrictions on planting layout and choice of plants; however, understanding the significance of the planting in your registered historic park or garden can help you to manage it and enhance historic character.*

# Appraisal

## Overview

- 5.1 As stated above, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. This section of the statement aims to identify the main issues of relevance to the determination of the planning application, and assess the scheme against the Development Plan.
- 5.2 The key material considerations of relevance in the determination of the application are as follows:
- Principle of Development;
  - Impact on Visual Amenity;
  - Access and Highway Considerations; and,
  - Other Material Considerations.

## Principle of Development

- 5.3 The proposal involves the proposed creation of visitor accommodation within kitchen garden area within Gnoll Country Park. Within the LDP, the site lies outside settlement limit, but is within a designated heritage Park, as recognised under Policy SP21.
- 5.4 In considering the principle of development key LDP policies to consider are policies EN3 (Green Wedges), SP21 (Built Environment and Historic Heritage), SP13 (Tourism), TO1 (Tourism Development in the Countryside) and BE1 (Design).
- 5.5 The application site contains within it the former kitchen gardens which are positioned to the east of the pleasure grounds, along with the service yard which is situated to the south of the fish pond. The gravelled service yard houses the pump house along with metal storage containers that enable the operations within the Park. Both of these areas can be accessed via Cimla Road at the southern end of the Park.
- 5.6 Neath Port Talbot County Borough Council has submitted a successful funding application to the UK Government's Levelling Up Fund to deliver £12 million of investment over the next two years at Gnoll Estate Country Park. The overarching focus of the Gnoll Estate Country Park project is to improve facilities, enable the restoration of the various heritage assets and enhance the natural environment within the Park in order to boost tourism prospects across the Park. Consequently, tourism policies SP13 (Tourism) and TO1 (Tourism Develop-

ment in the Countryside) are pertinent to this application. Policy SP13 advocates "high quality, sustainable tourism development", which is provided in this instance due to high-quality tourist accommodation being offered within the kitchen garden area, along with associated parking in the former pump house service yard.

5.7 Policy TO1 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;*
- 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.*

An assessment of the proposals against these criteria is offered below:

***1. It is demonstrated that the proposal is viable and contributes towards the quality and economic sustainability of the tourism industry***

A thorough appraisal of the proposed development was conducted, as part of the funding application submitted and in summary the holiday accommodation will offer a new revenue stream for the Park, along with boosting the local tourism economy by providing a unique accommodation attraction in the area. Moreover, the buildings on site will assist with interpretation of the kitchen gardens as a result of their placement and design, and the accommodation will allow visitors to experience the Park in an alternative way.

***2. It is demonstrated that either the proposal requires a countryside location or it could not be accommodated within an existing settlement***

The proposal is intrinsically linked to the Country Park and as such the developments location is dictated by this factor. The proposals aims is to reinstate the kitchen garden along with re-landscaping around the accommodation which is befitting of the Country Park's countryside location. The proposal forms a meaningful environment which reconnects visitors with the site and the wider Parkland. The scale and location of the development is appropriate and due to the site's green wedge allocation, it is not possible for the proposal to be situated within an existing settlement unless it would be situated outside the grounds of the Park.

***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***

Under subsequent headings, it is confirmed that there will be no impact upon ecology, landscape or cultural heritage. Furthermore, there will be no negative social, economic or environmental impact, it is considered that the proposed visitor accommodation and associated works will further enhance these elements within the Park.

***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.***

The proposal will see an increase in vehicle movements associated with the site. Access will be provided from Cimla Road up to the former service yard where parking spaces are provided for visitors to the holiday accommodation. At present, the road is only used by private vehicles and only utilised for authorised deliveries and pedestrian access. A Transport Statement (TS) accompanies this application which concludes, the impact of the forecast increase in trip generation that may be expected as a consequence of the development on the access and local highways network are minimal, with no reasons for refusal on transport and highways grounds. As noted previously in this document, a bus stop is situated on entry to the Country Park which offers services to Neath town centre, whereas running to the north of the site is national cycle route 47 which affords access by a range of transport modes.

- 5.8 Policy SP21 (Built Environment and Historic Heritage) is *"encouraging high quality design standards in all development proposals"*. As noted in the DAS, the aspiration is to provide rental holiday accommodation offering income generation for the Park, and an increase in overnight stays in the area to boost the local tourism economy. The design itself is considerate of the historic environment, and the proposals have been influenced by the site constraints which include proposals that are commensurate to the existing Parkland, whilst taking into consideration the surroundings, along with security and access arrangements associated with this southern portion of the Park.. The policy also states that any proposal should safeguard *"features of historic and cultural importance"*. In this respect, the proposal aims to enhance the significance and use of the key aspects of the current site as a tourist attraction. Within Policy SP21, the application site is identified as a Historic Park and Garden, one of six within the Local Authority.
- 5.9 In terms of Policy EN3 (Green Wedges), the site is located within the Neath/Tonna/Cimla/Efail Fach green wedge. The proposal is not supportive of inappropriate development, however given the fact that

the kitchen garden and service yard in their current form are not having a beneficial impact upon the Park, the proposed development will enable visitors to stay overnight at the Park whilst boosting the local tourism economy. The policy states that proposals in a green wedge are unacceptable *“other than those for certain justified or essential activities that need to be located in the area and small scale extensions”*. The proposal aims to make substantial improvements to the former kitchen gardens by uncovering the hidden heritage of the Park, along with boosting tourism in the area and providing overnight stays. The proposal is justified considering it will increase the number of visitors attending this area of the Park, and offers a new stream of income for the Park. To summarise, it is considered that the proposed works would not in any way prejudice the openness of the green wedge, therefore the proposal accords with the spirit of Policy EN3 (Green Wedges).

- 5.10 Policy BE1 (Design) advocates high quality design of proposals that take into consideration the existing environment to create beautiful places and spaces. This policy recognises the importance of the proposed development fitting in with the current character of the site, whilst considering its impact on the surrounding areas. Moreover, the design should factor in accessibility for all users, create an attractive safe place for visitors and use materials that match the characteristics of the site.
- 5.11 It can be confirmed that the proposal aligns with Policy BE1 (Design), with all the following measures proposed as part of the development:
- It complements and enhances the character and appearance of the site;
  - The design of the scheme takes into consideration the existing context;
  - Materials will be used that are appropriate to its surroundings
  - There will be no detrimental impact on highway safety;
  - Ecological enhancements are proposed as part of this application;
  - Natural surveillance is encouraged with an increase in the number of visitors attending the area

### **Impact on Visual Amenity**

- 5.12 The proposed development has been designed to have minimal impact upon the wider visual amenity of the Park. The proposal is confined within the kitchen garden area which is physically defined in terms of its boundaries from the wider Park and thus minimises any visual impact as a result of the development. The proposal aims to create a high quality visitor accommodation that respects the historic character of the site and has been developed through a contextual

analysis of the site and its current built form. Furthermore, elements of hard and soft landscaping will be provided on site to create amenity areas for visitors, along with safe routes for vehicular and pedestrian movement. The materials used in the build and as part of the repairs for the kitchen garden stone wall will also need to be appropriate for the setting to allow it to match its surroundings. The proposal complies with Policy BE1 (Design) as careful consideration has been given to the *"siting, design, appearance, massing and scale to minimise any visual intrusion and where appropriate enhance the visual aspects of the area"*.

### **Highways and Access Considerations**

- 5.13 For the holiday accommodation, visitor parking spaces will be provided in the service yard, whilst 4 drop off spaces have been provided in close proximity to the lodges. Cycle spaces will also be provided for every lodge. Access for vehicles and pedestrians from the high way to the accommodation car park will be provided along Cimla Road, whilst access into the car park will be controlled via a barrier to ensure that only accommodation users can park here.
- 5.14 Improvements to path surfacing will assist accessibility of the site, whilst two of the units have been created to be fully accessible and are also located near to the entry point and reception building.
- 5.15 As previously mentioned, the site lies in a sustainable location that can be accessed via bus. The nearest bus stop lies just before the main entry to the site along Fairyland. This stop is serviced by the 153 on a two hour basis, terminating at Neath bus station. Neath Train Station is less than a ten minute drive from the application site and receives a frequent service from both Transport for Wales and Great Western Railway. Running to the north of the site is national cycle route 47 which goes from Newport to Fishguard and forms part of the Celtic Trail West. A Transport Statement (TS) accompanies this application which concludes, the impact of the forecast increase in trip generation that may be expected as a consequence of the development on the access and local highways network are minimal, with no reasons for refusal on transport and highways grounds. As a result of the above, the proposal is considered to align with Policies SP1 (Climate Change), SP20 (Transport Network), TR2 (Design and Access of New Development) and BE1 (Design).

### **Other Material Considerations**

#### **Trees**

- 5.16 The submitted tree report states there are 25 trees contained within the application site (5 Category B, 8 Category C and 12 Category U). Of the 25 trees, only the Category U trees require removing.

- 5.17 In terms of recommendations within the report, protective fencing needs to be erected around the root protection zones prior to any work on site. The report advises that the trees should be inspected for any protected species, and that any form of hard surfacing construction within root protection zones is ill-advised. Should all recommendations be carried out from the report, the development is not deemed to have any negative effect on the vast majority of retained trees. From a policy perspective, LDP Policy EN7 (Important Natural Features) is pertinent to this material consideration. In summary, the development will not impact any trees of high or medium value, with only Category U trees requiring felling. Having considered the above, the proposal is compliant with Policy EN7.

### **Ecology**

- 5.18 In 2023, a bat survey was conducted of both the kitchen garden and service yard areas which revealed no bats were roosting in the buildings and therefore they do not present a constraint to development. The buildings within the site curtilage provide bird nesting habitat, although their loss will be managed for by the installation of bird and bat boxes. Some scrub will be lost as a result of holiday accommodation, whereas a few trees and some scrub will be lost in the service yard area. There is also some Japanese Knotweed and Himalayan Balsam within the area, which will be managed by a specialist and controlled with biosecurity control measures respectively.
- 5.19 Ecological enhancement for the kitchen gardens and service yard will comprise the following:
- Installation of bird and bat boxes;
  - Native shrub planting and area of woodland planting with understory of wildflowers to be provided in kitchen garden;
  - Native scrub planting and woodland flora grassland to be provided in parking area
- 5.20 Having discussed with an ecologist from NPTCBC, the precise details and locations of these ecological enhancements can be conditioned to be agreed with the LPA prior to completion of the development. As no further survey work is necessary and a set of ecological enhancements have been proposed, the scheme is compliant with Policies SP15 (Biodiversity and Geodiversity) and EN7 (Important Natural Features). The proposal will protect, conserve, enhance and manage *"Important habitats, species"* as noted in Policy SP15, whereas the development won't *"adversely affect ecologically or visually important natural features such as trees, woodlands, hedgerows / field boundaries, watercourses or ponds"* which is requested as part of Policy EN7. Measures have been put in place to protect existing trees, with only Category U trees needing felling. Furthermore, biodiversity enhancements have been put forward to boost the ecological cre-

dentials of the development, including provision of bird and bat boxes along with native scrub and shrub planting.

### **Landscaping**

- 5.21 The Landscaping Plan (Drawing Ref: **2080-01-DLA-L-DR-3001-S2-P02**) shows some landscaping is proposed in order to further integrate the proposal into its wider surroundings. The full planting schedule is available within the aforementioned drawing. In summary, the landscaping additions preserve and enhance biodiversity and enable the scheme to pursue biodiversity net gain.
- 5.22 In terms of Policy BE1 (Design), the proposal adheres to the following point *"4. It utilises materials appropriate to its surroundings and incorporates hard and soft landscaping and screening where appropriate"*. Introducing landscaping into the development will enhance the scheme and allow it to integrate into its immediate surroundings. The proposal acknowledges that *"Landscaping has an important effect and is a significant part of the overall design process"*.

### **Drainage**

- 5.23 For this proposal, surface water runoff is proposed to discharge to the existing waterbody via the stream. The discharge rate will be limited by two separate flow control chambers for all storm periods up to 1 in 100 years and 40% climate change. Two attenuation tanks of 80 metres deep are proposed to provide storage, that can accommodate extreme weather events. SAB approval will be required as a result of the new prefabricated lodges, storage areas and parking spaces being created are over 100 square metres.
- 5.24 Foul drainage is required for the kitchen garden due to it including toilets, showers, baths and kitchens. As there is no public sewer within a reasonable distance of the development site, a package treatment plant is required to treat the foul water flows from the site, that will be shared with Pond Cottage. The Non-Mains Drainage Assessment submitted confirms the treatment plant will be installed correctly and it is accepted that it will be strictly controlled by permitting from Natural Resource Wales. Foul water flows were calculated at 6.69 l/s for the kitchen garden area
- 5.25 Having considered the above, the proposal aligns with the following point of Policy BE1 (Design): *"9. Its drainage systems are designed to limit surface water run-of and flood risk and prevent pollution"*.

### **Archaeology**

- 5.26 A Written Scheme of Investigation and Historic Environment Desk Based Assessment (DBA) has been produced by Dyfed Archaeological Trust to accompany the proposed set of works at Gnoll Park. The

DBA summarises that an adverse impact has been recognised for the site as a result of the demolition to the garden building, new entrances being provided through the garden wall, groundworks connected with the construction of holiday accommodation, along with clearance and levelling works necessary to restore the garden areas within the walled garden and wider site. As a result of the groundworks needed and the removal of existing structures, this is deemed to be of a moderate adverse impact. The restoration of garden areas from its current condition will be a beneficial impact to the walled garden.

- 5.27 In terms of mitigation, additional archaeological mitigation may be needed which would be provided by the archaeological advisor to NPTCBC. Proposed works will impact the material remains of the structures within the site and therefore may benefit from a proportionate level of historic building record. The report advises that groundworks could potentially impact any archaeological remains on sites, which includes the visitor centre area. Any development would need to consider the potential need for additional archaeological works should substantial remains be discovered during the archaeological watching brief. From a policy perspective, the proposal in tends to align with Policy SP21 (Built Environment and Historic Heritage) by safeguarding the existing historic significance of the site, and will notify the relevant parties if any further archaeological findings are made on the site.

#### **Ground Investigation and Coal Mining Risk**

- 5.28 The Coal Mining Risk Assessment submitted revealed the outcrop of the Swansea Five Feet coal seam is shown to lie within the site, therefore the subsidence hazard associated with shallow mine workings below the site is deemed to be potentially high. As a result of the Swansea Five Feet seam over the site, the risk of mine entries is considered potentially high.
- 5.29 In terms of further investigative work, the report advises the following:
- At least five boreholes to 30m required due to mining hazard below site;
  - Assessment of subsidence risk to development and options considered for risk mitigation measures
  - Mine Gas Risk Assessment may also be required.
- 5.30 Following the results of the Coal Mining Risk Assessment, Jubb produced a Ground Conditions Assessment Report which revealed the following:

- Made ground was encountered from ground level extending to depths of around 0.35m – 1.4m below existing ground levels;
- The outcrop of the Swansea Five Feet coal seam is shown east-west across the site;
- One sample tested from made ground contained exceedances of Generic Assessment Criteria for Public Open Space end-use for two contaminants;
- There is a potential for unrecorded shallow workings under the site therefore gas monitoring advised in the area as part of any further works;
- Coal mining ground investigation comprising rotary boreholes to investigate any potential shallow coal seam working below site required;
- Subsequent remediation strategy and verification plan will be needed for the recommended clean cover system within the site

5.31 Having considered the above, the proposal accords with LDP Policy M1 (Development in Mineral Safeguarding Areas). In respect of Policy M1, it has been evidenced throughout this document that there is a need to redevelop the kitchen garden and service yard which have been neglected, and further justification for this can be seen in the Design and Access Statement.

## Conclusion

- 6.1 This planning statement has been prepared on behalf of The Head of Property and Regeneration at Neath Port Talbot County Borough Council (NPTCBC) for the proposed creation of visitor accommodation within kitchen garden area at Gnoll Estate Country Park, Fairyland, Neath, SA11 3BS. This application forms part of a series of works proposed at Gnoll Park as part of a Levelling Up Funding programme.
- 6.2 The application site encompassing the kitchen garden area and former pump house service yard within Gnoll Country Park. The proposal will provide high quality visitor accommodation that will boost the tourism prospect of the Park, whilst facilitating the reinstatement of the formal kitchen garden, in addition to re-landscaping in the area that will improve the visual aspects of the site. The re-utilisation of the service yard as a car park will bring this area back into beneficial use, with associated landscaping also provided to ensure the proposal is of high design quality.
- 6.3 The impact upon the registered park and garden has been considered as part of the application. The impact upon the Park is set to be positive, with an opportunity for visitors to engage with this neglected area of the Park. The proposals are of high design quality that reinforces a sense of place and assimilates with the character and appearance of the park. Consideration has been given to the existing layout of the site, with the reconstruction of the potting sheds and cabins which reflect the historic form, enhancing the presentation of the kitchen garden in the wider Parkland.
- 6.4 This document has demonstrated that the development, as proposed, is compliant with relevant policies contained within the adopted NPTCBC LDP, in particular Policies EN3 (Green Wedges), SP21 (Built Environment and Historic Heritage), SP13 (Tourism), TO1 (Tourism Development in the Countryside) and BE1 (Design). In addition to this, the proposal accords with relevant Technical Advice Notes and policies noted within Future Wales and Planning Policy Wales.
- 6.5 Notwithstanding the above, a comprehensive assessment is provided in Section 5 of this statement. Separate supporting documents in respect of material considerations are also included in the application package and highlight the proposal as acceptable in all regards.
- 6.6 As such, it is concluded that the proposal fully accords with both national and local policies. Furthermore, there are no material considerations which would prevent the planning application from being determined in accordance with the relevant planning policy

framework. In this respect, it is respectfully requested that Neath Port Talbot County Borough Council consider this planning application favourably and grant planning permission for the proposed development.