

FULL PLANNING APPLICATION

**WILD ROSE COTTAGE, DUFFRYN LANE, ST. NICHOLAS,
CARDIFF, CF5 6TA**

**PROPOSED MIXED UNIT HOLIDAY ACCOMODATION
SCHEME**

PLANNING STATEMENT

APRIL 2022



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1.0 INTRODUCTION

1.1 This Planning Statement has been prepared in support of a planning application, submitted on behalf of Mr Andrew Walker in relation to the following development proposal, located at Land at Wild Rose Cottage, St Nicholas:

'Proposed Mixed Unit Holiday Accommodation Scheme, at Wild Rose Cottage, St Nicholas'

1.2 This Planning Statement outlines the context within which the application is made and provides a detailed examination of the main planning considerations raised by the proposals, together with reasoned justification in support of the proposed development.

Information Submitted in Support of the Application

1.3 The following documents are submitted with this application:

Document	Author
Application Forms	Geraint John Planning
Planning Statement	Geraint John Planning
Plans and Drawings	Gerald Blain Associates
Business Plan	Andrew & Claire Walker
Ecology Report	I & G Ecological Consulting
Reptile and Amphibian Mitigation Plan	I & G Ecological Consulting
Lighting Plan	SABA Consult
Flood Consequence Assessment	HYDROGEO
Transport Statement	Apex Transport Planning Ltd
Tree Survey	Treecare Consulting
Landscaping Plan	Treecare Consulting
Structural Survey	M.A.REES

1.4 The following information has been prepared in support of the planning application:

- Planning Application Form;
- Plans and Drawings (prepared by GBA):
 - 5m Cadair idris 1-50 scale all elevations
 - Wild Rose Cottage_Conversions-10_Existing Plan and Elevations Page 1 (A3) (Drawing No. 10)
 - Wild Rose Cottage_Conversions-11_Existing Plan and Elevations Page 2 (A3) (Drawing No. 11)
 - Wild Rose Cottage_Conversions-12_Proposed Plan and Elevations (A3) (Drawing No. 12)
 - Wild Rose Cottage_Existing-01 Location Plan (Drawing No. 01)
 - Wild Rose Cottage_Full_Rev E-02_Existing Block Plan (Drawing No. 02)
 - Wild Rose Cottage_Full_Rev G-03_Proposed Block Plan (Drawing No. 03)
 - Wild Rose Cottage_Lodges-20 Proposed Lodge Example (Drawing No. 20)
- Lighting Plan (prepared by SABA):
 - Wild Rose Cottage Lux Calcs and Layout - E01 (Drawing No. 2122.015-E01)
- Planting Location Plan (prepared by Treecare Consulting):
 - Wild Rose Cottage Planting plan
- Topographical Survey (prepared by JR Land Surveys):
 - JR-1636

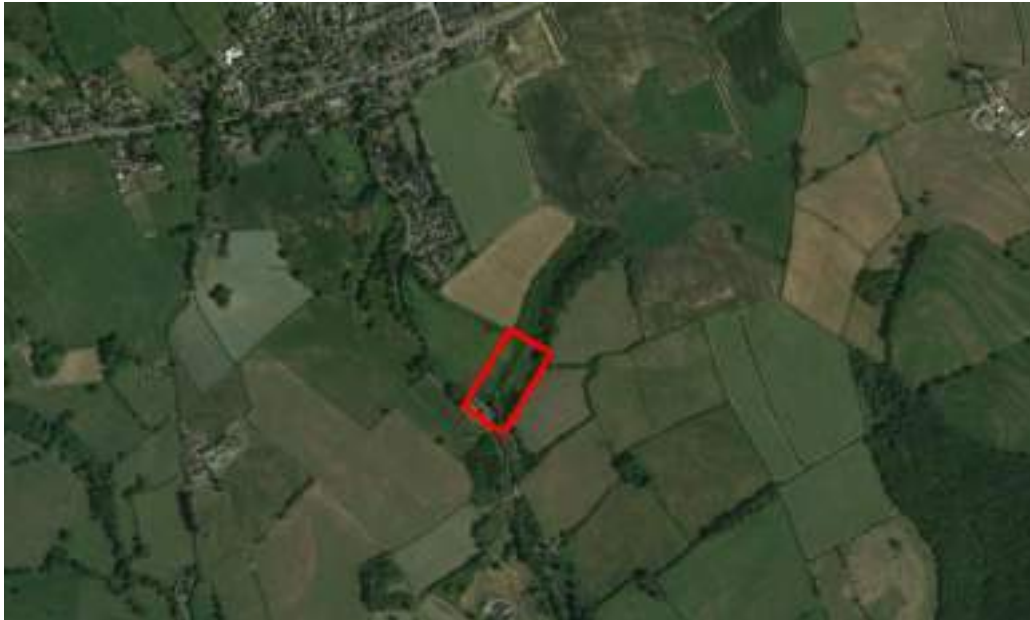
1.5 The statement is structured as follows:

- **Section 2** provides a description of the characteristics of the site and surrounding area, and details regarding the planning history associated with the site;
- **Section 3** provides details of the development proposals and design objectives;
- **Section 4** outlines the relevant planning policy framework in relation to the site and the development;
- **Section 5** provides the pre-application response received from the LPA;
- **Section 6** analyses the key planning considerations arising from the proposed development (considering the planning policy context);
- **Section 7** sets out our conclusions.

2.0 SITE AND SURROUNDINGS

The Site and Surroundings

- 2.1 The site is located within a rural setting and is in close proximity to the settlement boundary of St. Nicholas within the administrative boundary of the Vale of Glamorgan Council. The total area of the site measures approximately 0.79 ha, and consists of a residential dwelling situated to the west of the site, adjacent to Duffryn Lane.



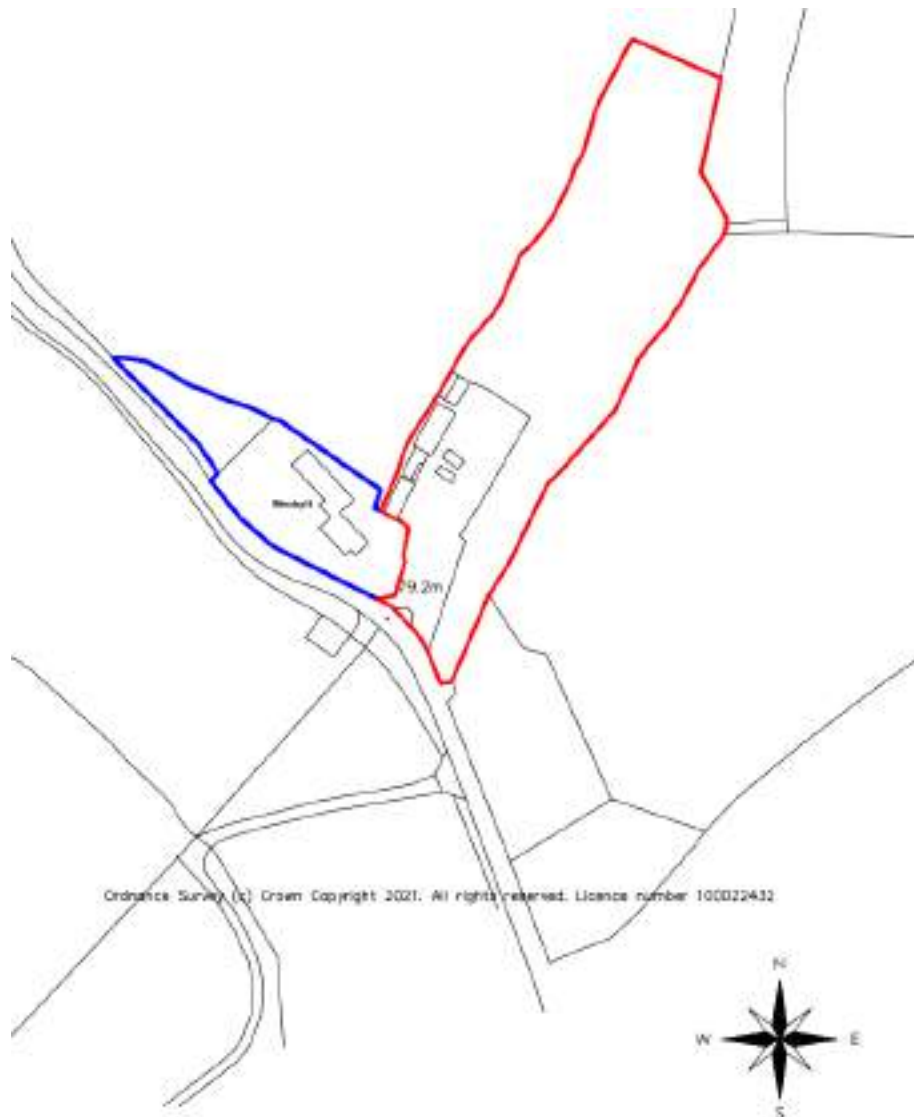
Site in context (Approximate Red Line Boundary of the Site)

- 2.2 The site is located outside of the settlement boundary of St. Nicholas, with residential dwellings situated to the north within the established settlement of St. Nicholas. To the south, east and west of the site lies a combination of vegetated areas and open agricultural land.



Approximate Red Line Boundary of the Site





- 2.3 An Existing Site Location Plan is enclosed and submitted within this application, which depicts the exact site boundary of the application site, alongside the adjoining land within the applicant's ownership. This is illustrated below:



Site Location Plan

- 2.4 The site is located within easy and convenient walking distance of St Nicholas and Trehill Church Bus Stops, which provide services to and from Cardiff. In addition, the site is just a short 5-minute drive from the facilities and services available at Culverhouse Cross.
- 2.5 The site comprises a three-storey residential dwelling which fronts directly onto Duffryn Road. The site also comprises other buildings which are not visible from the road. The location and photographs of these buildings are included overleaf:



Key					
1	Wild Rose Cottage		2	Brick Buildings + Garage	
3	Shipping Containers		4	Corrugated Barn in disrepair	



(1) Wild Rose Cottage



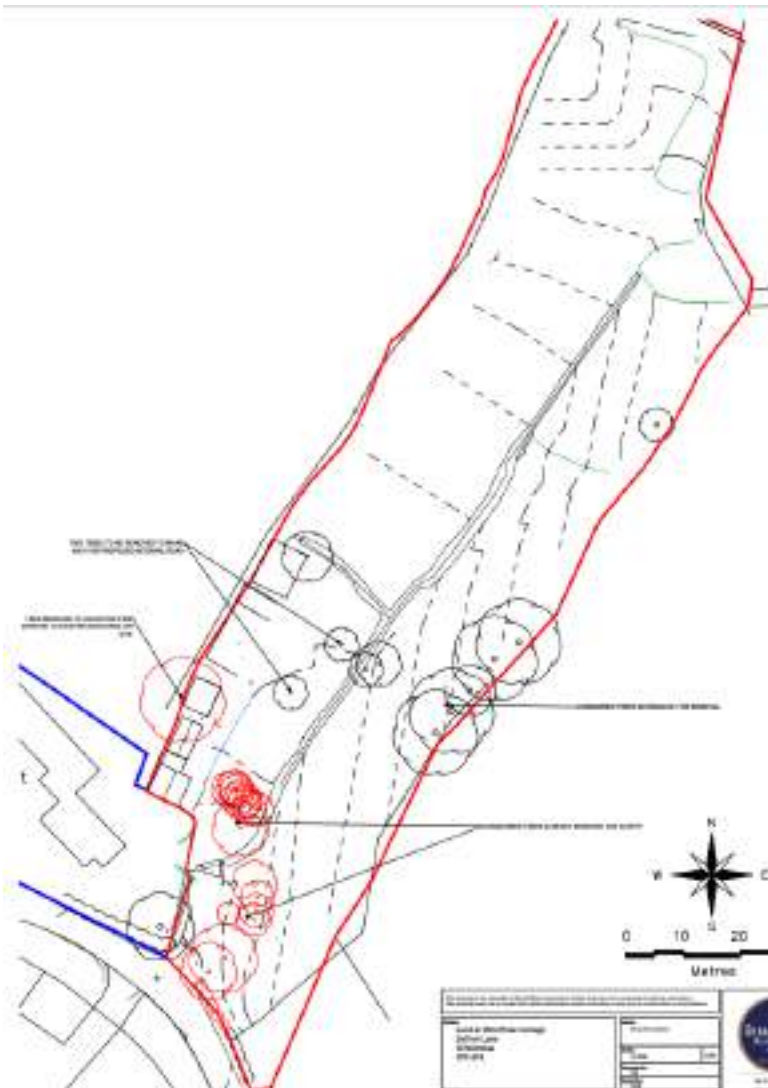
(2) Existing Garage (to be used as Front of House) and Brick Building (to be converted)



(3) Shipping Containers



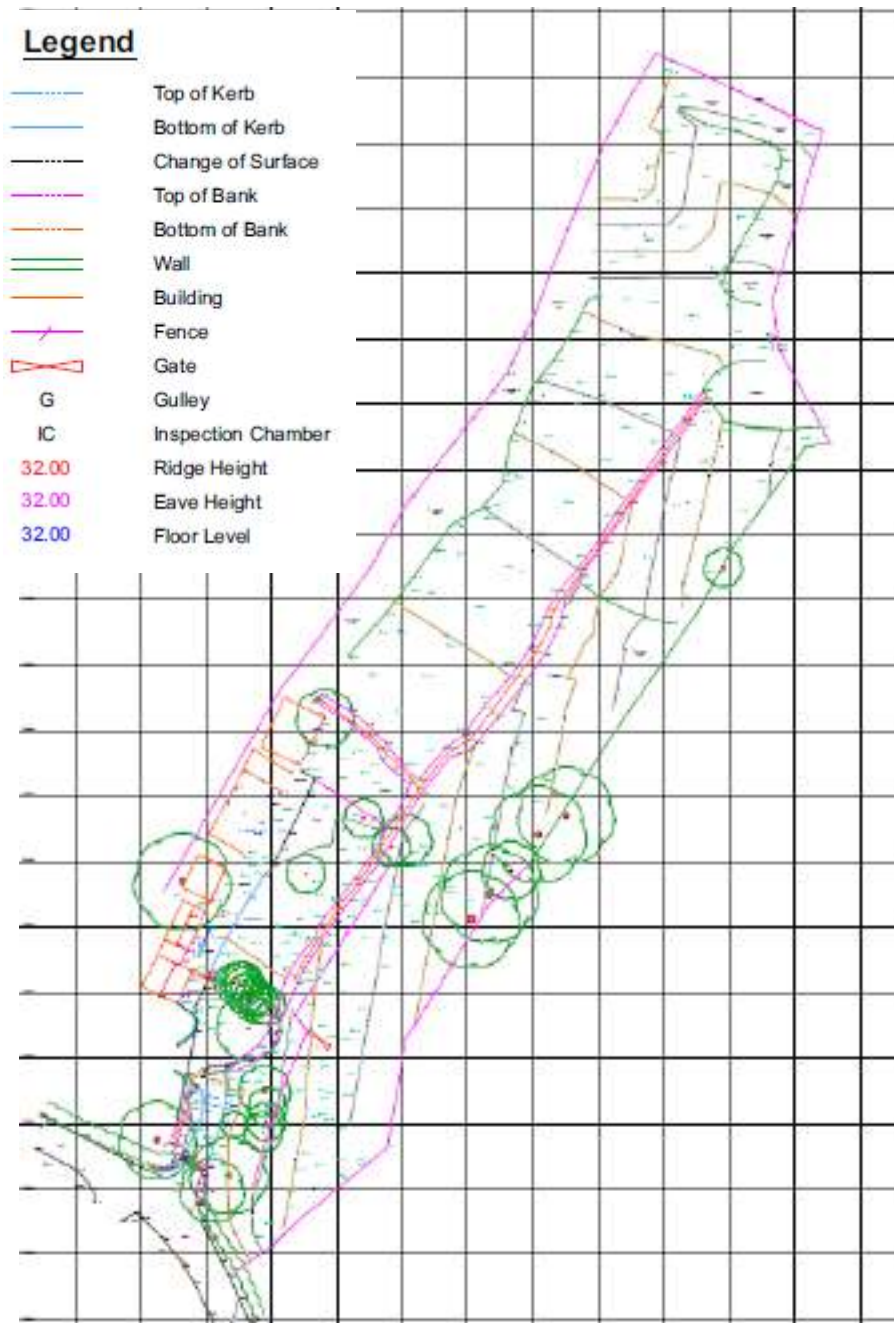
(4) *Corrugated Barn in disrepair (to be removed)*



Existing Block Plan

Site Topography

- 2.6 A Topographical Survey has been undertaken, by JR Land Surveys, and submitted in support of this application to illustrate the existing conditions and land use of the site. The Survey evidently illustrates the substantial existing built form, and the levels and other key features encompassed within the site. As shown within the Survey (extract overleaf), there are a number of existing outbuildings within the southern area of the site, immediately adjacent to the access. This built form comprises a number of redundant buildings, barns, and shipping containers that run along and abut the western boundary of the site, as well as remnants of other buildings. These are all shown within the submitted Site Location Plan.
- 2.7 The Survey also demonstrates that the site comprises a number of existing trees, an entrance way and gate at its southern entrance, and an open paddock area within the northern section of the site. The proposal seeks to replace the existing development form within the site, which is discussed in further detail in the successive chapters.



Topographical Survey

Access

- 2.8 The site is currently accessed off Duffryn Lane which allows for two-way traffic (and partly benefits from a pedestrian footpath) and links the site to St Nicholas, as well as providing access to surrounding areas such as Duffryn and Wenvoe:



View of main site entrance



View of Access gate

Planning History

2.9 An online planning history search of the site has been undertaken via the Vale of Glamorgan Council's online planning service. This has identified that there are a number of planning applications which have been submitted for the above site.

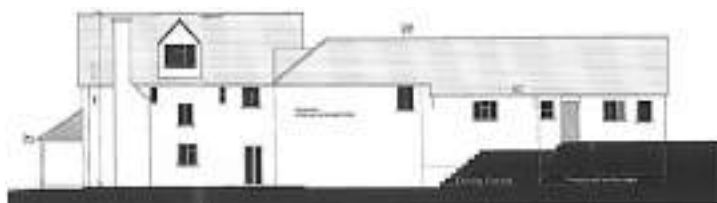
Ref	Address	Proposal	Decision	Date
2016/00036/FUL	Wild Rose Cottage Duffryn Lane St. Nicholas Cowbridge Vale of Glamorgan CF5 6TA	Extension of existing garage and construction of a 2-bedroom retirement dwelling for family members (Granny annexe)	Approved	18/05/2016
2015/00513/FUL	Wild Rose Cottage, Duffryn Lane, St. Nicholas	Demolition of existing garage and construction of a 'granny annexe' retirement dwelling for family members	Withdrawn	15/10/2015
2007/00526/FUL	Winchpit, Duffryn Lane, St Nicholas, Vale of Glamorgan. CF5 6TA	Conversion of the existing garage adjoined to the house into an office/gym	Approved	30/06/2007
2003/01579/FUL	Winchpit, Duffryn Lane, St. Nicholas	Extensions and new garage to existing dwelling	Approved	07/02/2004
2002/01700/FUL	Winchpit, Duffryn Lane, St. Nicholas	Extension and alteration to existing dwelling	Approved	24/01/2003

2.10 Application (Ref. 2016/00036/FUL) "*Extension of existing garage and construction of a 2-bedroom retirement dwelling for family members*" is considered to be of most relevance and is summarised below:

2.11 This application for the site approved the construction of a two storey 'granny annex'. The layout incorporates the existing garage floor plan and extends it to provide a living / kitchen area, and lounge room on the ground floor. A staircase provides access to the first floor, 2 bedrooms and 2 shower rooms. This is shown in the plans and elevations provided overleaf:



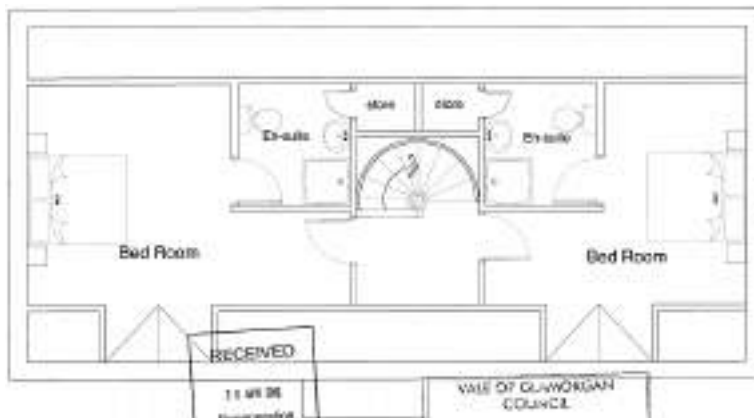
Front Elevation (ref. 2016/00036/FUL)



Rear Elevation (ref. 2016/00036/FUL)



Ground Floor Plan (ref. 2016/00036/FUL)



First Floor Plan (ref. 2016/00036/FUL)

- 2.12 The acceptability of the principle of development was confirmed in the Officer Report, an extract has been included below:

"...it is considered that the proposal represents an acceptable form of residential annexe to the main dwelling that would not detract from the character and appearance of the dwelling itself or the surrounding rural landscape of the Duffryn Basin and Ridge Slopes Special Landscape Area."

- 2.13 Since the application's approval in 2016 the development has since been completed.

3.0 DEVELOPMENT PROPOSALS

3.1 The enclosed application is for full planning permission for the following development proposal:

'Proposed Mixed Unit Holiday Accommodation Scheme, at Wild Rose Cottage, St Nicholas'

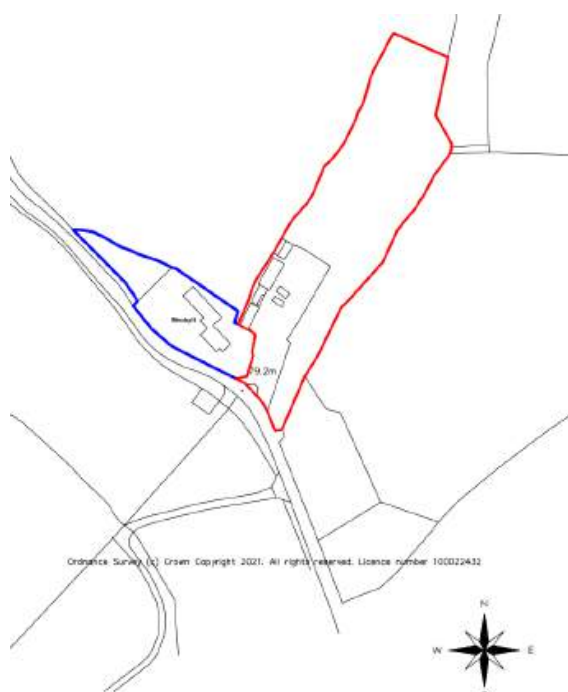
3.2 The proposed development seeks to create a mixed holiday accommodation scheme within the site boundary in the form of reused buildings, lodges, glamping pods, and touring caravans and pitches. Further detail of the accommodation proposed, is provided below.

Existing Site

3.3 Prior to setting out the proposals in detail below, it is considered prudent to provide context to the site's existing land use / built form – which demonstrates how the applicant has arrived at the site layout for the proposed tourist accommodation scheme.






3.4 As previously set out, a Topographical Survey has been undertaken (submitted in accordance with Enquiry), which evidences the existing built form and conditions of the application site – this output has informed the proposals. The access point to the site, and the immediate adjacent areas, comprise a number of existing trees and an existing access track which provides vehicular entry to the site. The southern to middle area of the site consists of large concrete hardstanding and a number of existing outbuildings. These consist of 1 garage, 3 brick buildings (currently used for storage which the applicant seeks to convert), 2 large shipping containers, and a large dilapidated corrugated barn (which the applicant seeks to remove). The northern area contains an open area of land, with existing trees and shrubbery wrapping around the site's boundary.

3.5 Within the subsequent sub-headings, the proposals are split into three 'geographical' areas of the site: Zone 1 – Entrance & Arrivals, Zone 2 – Yard & Lodges, and Zone 3 – Touring & Camping. This allows a breakdown of the proposals by each area, and demonstrates how the development has actively considered and responded to the context and existing use of the site. The existing Site Location Plan (which evidences the existing built form within the site) and illustrative Block Plan, as well as an official Proposed Block Plan, are provided below.



Site Location Plan



Key					
1	Wild Rose Cottage		2	Converted Brick Buildings + Front of House Garage	
3	Lodges		4	Glamping Pods	
5	Touring & Camping Pitches				

Illustrative Block Plan



Proposed Block Plan

Zone 1 – Entrance & Access



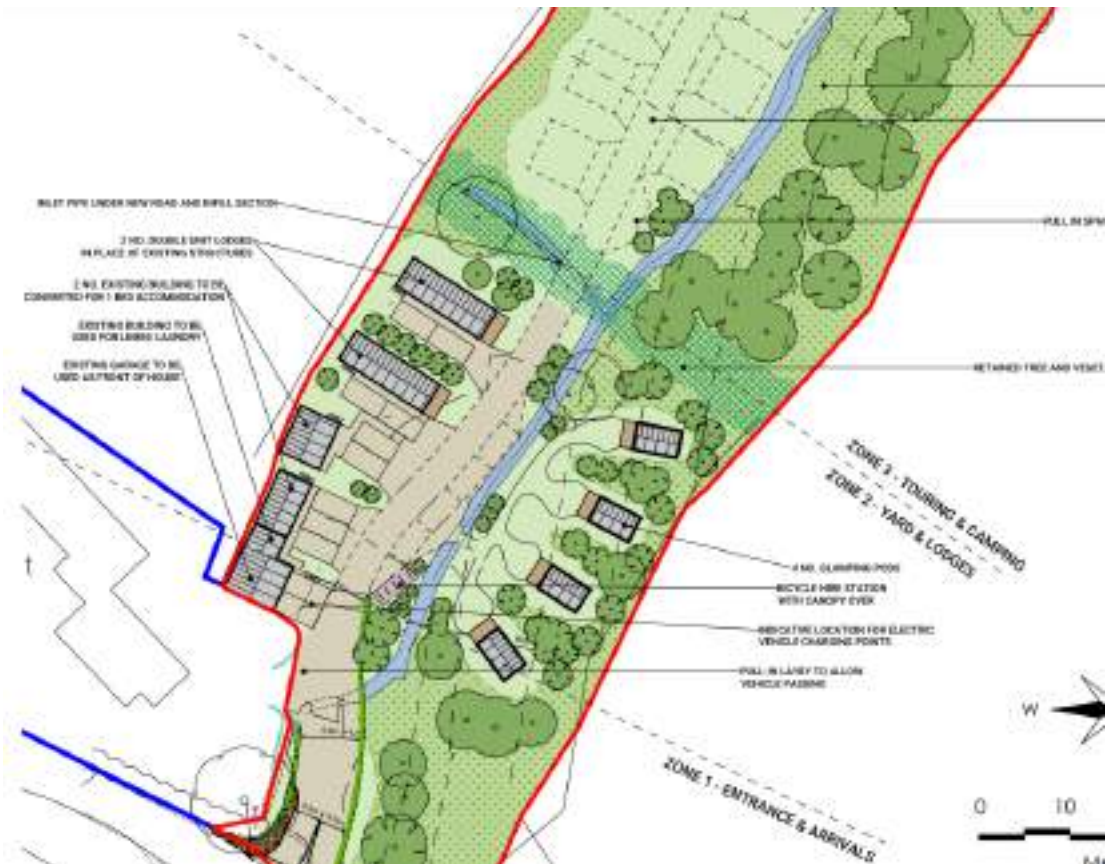
Proposed Zone 1

- 3.6 As illustrated in the above plan and in Sections 2.8-2.11 the site will be accessed off Duffryn Lane which allows for two-way traffic (and partly benefits from a pedestrian footpath).
- 3.7 It is considered that the current access is sufficient to accommodate vehicular movements to and from the site, and that the internal access road will efficiently allow traffic passing within the site. However, to ensure this is the case we aim to widen the existing access to 7.3m to achieve a two-way access at the junction to the main road.
- 3.8 A Transport Statement has been produced (by Apex Transport Planning Ltd) to assess the suitability of the access and address any concerns regarding visibility, traffic issues and to show the low impact of the new engineered frontage. This document is submitted in support of the proposals.
- 3.9 As part of the proposals to the access and its new frontage, tree planting will be undertaken to increase biodiversity and natural screening within the site. This is shown by / in the Tree Survey Site Plan produced by 'Trecare Consulting' which shows how trees G1, G8 and G9 are set to be retained (only for Pruning Work).
- 3.10 Following Pre-Application dialogue with the LPA, the client has decided to convert the existing garage to serve as the front of house / reception area. This is in the interest of reducing the number of buildings being built in the countryside to reduce the quantum of development and potential impact on the Special Landscape Area (SLA) designation. For context, previously, a new front of house / small reception cabin was proposed. However, after Pre-Application Discussions with the LPA, the client is willing to compromise and utilise the existing garage to serve as a front of house / small reception cabin.



Photos of Garage to be used as Front of House / Reception

Zone 2 – Yard & Lodges



Proposed Zone 2

3.11 The proposed new mixed unit holiday accommodation within the southern area will consist of the following:

- Linen / Laundry storage building



Linen / Laundry storage building (outlined in yellow)

- 2 existing buildings to be converted into 1 bed accommodation;



Red Brick Building (to be converted)



Grey Brick Building (to be converted)



Image of both buildings to be converted together

- 2 double unit lodges to replace the large dilapidated corrugated barn and shipping containers on the concrete hardstanding at the site; and



Images showing large shipping containers (to be removed), and concrete hardstanding at the site.





Large dilapidated corrugated barn to be removed and replaced with two smaller lodges

- 4 No. glamping pods on the eastern side of the site.



Images showing Area for the 4 Glamping Pods

Summary

- 3.12 As shown above the development will utilise the site's current envelope whereby the three existing brick barns will be repaired and restored through careful repair work. The existing red brick building adjacent to the existing garage will be used as a laundry and linen building, and the other 2 existing brick buildings will be converted into 1 bed accommodation.



Proposed Plans and Elevations of Converted Buildings

- 3.13 Two lodges are proposed to replace the large dilapidated corrugated barn and shipping containers in the yard area (which have been at / on the site for 30 plus years) on the concrete hardstanding at the site. This will significantly improve the character, appearance and visual amenity of the countryside as the unsightly barn and shipping containers will be removed. The lodges have been located here as the potential impact of these on the land will be minimal as they will be on already present concrete hardstanding (yard area). The location of these structures on the hardstanding has also been informed by the established scale of the built form in the area and in the interest of mitigating the visual impact of the proposals through the medium of the sheltered, wooded surroundings. This will therefore reduce the material difference between the established and proposed scale of development in the interest of reducing any potential visual impact.



Concrete Hardstanding at the site (shown in red)



Example of Lodge

- 3.14 Four glamping pods are proposed on the eastern edge of Zone 2 that will appear as structures sitting within a wooded, natural area (rather than an area dominated by the pods) across from an existing watercourse that flows throughout the site. A small bridge will be created to cross from the parking spaces / area to the glamping pods. In this way, the pods will be sitting appropriately within the wooded area benefiting from the natural screening provided at this location.



Example of Glamping Pods

- 3.15 Parking within the site will be located in multiple locations to allow for ease of accessibility. There will be 4 parking spaces provided at the front of the glamping pods as well as parking provision for the two lodges and existing brick buildings (to be restored). The parking spaces for the glamping pods will be made from grass protection mats and gravel, whereas the parking for the lodges and converted buildings will be on the concrete hardstanding that is already present. This will mean that there will be minimal damage to the land as minimal ground works and minimal digging are proposed.
- 3.16 Tree planting is also proposed surrounding the above accommodation to provide natural screening within the site and ensure that the proposed buildings naturally sit within their environment. This context-sensitive approach is wholly appropriate to the site and its surroundings.



Extract from the Landscaping Plan showing Glamping Pods sitting within a wooded, natural area

Zone 3 – Touring & Camping



Proposed Zone 3

- 3.17 For the northern area of the site, the proposed development seeks to make use of the existing well enclosed paddock for touring and caravan pitches. It is proposed that 14 touring and camping pitches will be provided to increase the range of tourism accommodation provision on offer within the site.
- 3.18 As previously set out, this area encompasses open space whereby it does not benefit from any existing building structures which can be retained and re-used for accommodation. Temporary accommodation along with a temporary toilet and shower block (for seasonal use) is proposed. This will soften the proposals from an 'overdevelopment' perspective so that it is in line with low impact tourism and the Council's Tourism and Development SPG – Low Impact Tourism. This will ensure that the site follows the existing built form.
- 3.19 A retained tree and vegetation belt will split up Zones 2 and 3 to highlight the movement from built form and concrete hardstanding already present at the south of the site, to the non-built form and temporary accommodation on the grassland at the north. Furthermore, Zone 3 will be an unkept wildflower meadow to highlight, and maintain the soft green landscape at this part of the site. This approach actively softens and mitigates the proposed built form at the site demonstrating that the protection of the natural environment is at the forefront of the proposals.
- 3.20 A series of images are provided overleaf depicting the exact condition of the existing northern area within the site.



Images Showing Zone 3 of Site

- 3.21 Each of the touring and caravan pitches will benefit from their own parking areas and access to the plots from the internal road proposed. This internal road was originally intended to be made from 'Grasscrete', however after discussions with the LPA during the Pre-Application process the internal road and parking areas will now be made out of grass protection mats. This compromise (which the applicant has been forthcoming in accepting) will mean that the materials used in the proposal will have the lowest impact (again reducing the risk of 'overdevelopment' compared to a tarmac road) and no damage to the quality of the land (as minimal ground work will be required). Similarly, they will contribute to a less engineered appearance, and the amount of surfacing will ultimately be kept to a minimum.



Example of Grass Protection Mats

4.0 PLANNING POLICY CONTEXT

- 4.1 A review of the planning policy context associated with the site and proposed development (at the national and local level) is provided within this section of the Statement.
- 4.2 The key planning policies of relevance to the determination of the application are outlined below. A detailed assessment of the accordancy of the proposed development with these policies is provided in Section 5 of the Statement (Material Considerations).

National Planning Policy

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

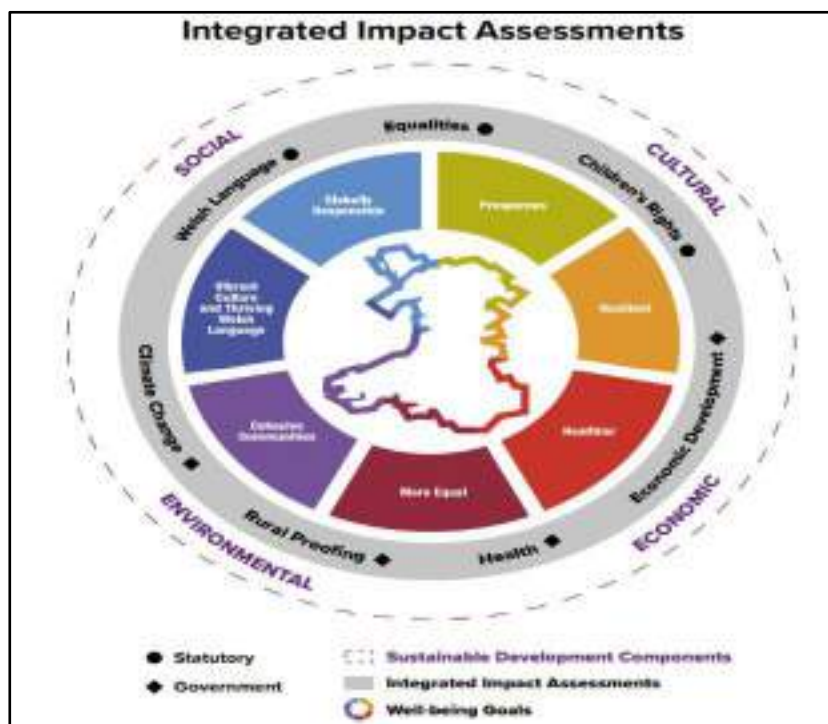
Future Wales: The National Plan 2040

Background to the Plan

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

Integrated Sustainability Appraisal

- 4.5 Future Wales recognises the importance of The Well-being of Future Generations Act, discussed in detail in the next section of this document, and its obligations. The Wellbeing of Future Generations Act has influenced Future Wales and its principles, including the 5 ways of working (long-term thinking, prevention, collaboration, integration and involvement) which have actively been embedded into the plan. Through the development of Future Wales, the plan has been subjected to the Strategic Environmental Assessment and Sustainability Appraisal approach, shown in the image below, as well as other impact assessments. Through this approach, ongoing stakeholder engagement and the use of the Well-being of Future Generations Act to inform the plan, the principles of sustainable development have been embedded within Future Wales.



Integrated Impact Assessment Approach

The Future Wales Outcomes

4.6 In order to achieve its vision by 2040, Future Wales has set out 11 outcomes which act as overarching ambitions based on the national planning principles and national sustainable placemaking outcomes set out in Planning Policy Wales. The 11 Outcomes effectively represent the goal for Wales in 2040. These outcomes include:

- A Wales where people live and work in connected, inclusive and healthy places;
- A Wales where people live in vibrant rural places with access to homes, jobs and services;
- A Wales where people live in distinctive regions that tackle health and socio-economic inequality through sustainable growth;
- A Wales where people live in places with a thriving Welsh language;
- A Wales where people live and work in towns and cities which are a focus and springboard for sustainable growth;
- A Wales where people live in places with prosperity, innovation and culture are promoted;
- A Wales where people live in places where travel is sustainable;
- A Wales with world-class digital infrastructure;
- A Wales where people live in places that sustainably manage their natural resources and reduce pollution;
- A Wales where people live in places with biodiverse, resilient and connected ecosystems; and
- A Wales where people live in places which are de-carbonised and climate resilient.

Future Wales Spatial Strategy

4.7 The Future Wales' spatial strategy sets out a 'guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years. The strategy blends the existing settlement patterns and the distribution of jobs and homes with a vision of managing change and future trends for the benefits of everyone in Wales.' Whilst Future Wales

encourages development in cities and large towns to grow urban areas and utilise the potential of these places, it must be noted that the plan also states that 'in all parts of Wales the strategy supports sustainable growth. Any place without jobs, homes, community spaces and wildlife has no prospect of having a thriving and cohesive community, Welsh language or economy'. An extract of the Wales spatial strategy, identifying south east Wales as a national growth area, is provided overleaf. For the south east Wales region, the Future Wales plan states that 'housing, economic growth, digital and transport connectivity infrastructure should be co-ordinated and planned on the basis of the whole region. The management of natural resources, flooding and the protection and enhancement of areas of environmental and landscape important should inform strategic decisions on locations for growth and new infrastructure.



Future Wales Spatial Strategy

Relevant Policies to the proposals

- Policy 1 (Where Wales will grow);
- Policy 7 (Delivering Affordable homes);
- Policy 8 (Flooding);
- Policy 9 (Resilient Ecological Networks and Green Infrastructure);
- Policy 11 (National Connectivity);
- Policy 12 (Regional Connectivity);
- Policy 13 (Supporting Digital Communications);
- Policy 15 (National Forest);
- Policy 33 (National Growth Area: Cardiff, Newport and The Valleys);

Planning Policy Wales (11th Edition, February 2021)

4.8 Planning Policy Wales (PPW) forms the overarching national planning policy document within Wales, providing guidance to Local Planning Authorities (LPAs) for the preparation of

development plans and the determination of planning applications through their development management functions.

Key Planning Principles

4.9 Paragraph 2.13 states that *"The plan-led system underpins the delivery of sustainable places to ensure all development plans and decisions taken by the planning system work together to deliver sustainable places. The Key Principles (see Figure 4) represent a guiding vision for all development plans, including Future Wales"*. The key principles are as follows:

- Growing our economy in a sustainable manner;
- Making best use of resources;
- Facilitating accessible and healthy environments;
- Creating and sustaining communities; and
- Maximising environmental protection and limiting environmental impact.

4.10 Paragraph 2.17 states *"In responding to the key principles for the planning system, the creation of sustainable places and in recognition of the need to contribute to the well-being of future generations in Wales through placemaking, development plans and development proposals must seek to deliver development that address the national sustainable placemaking outcomes"*.

Sustainability and Placemaking

4.11 Sustainable development forms a key consideration central to all policies contained within Planning Policy Wales (PPW). Paragraph 2.1 states: *"The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation"*.

4.12 Paragraphs 2.8-2.9 state that: *"Planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales. This can be done through maximising their contribution to the achievement of the seven well-being goals and by using the five Ways of Working [long-term thinking, prevention, collaboration, integration and involvement], as required by the Well-being of Future Generations Act. This will include seeking to maximise the social, economic, environmental and cultural benefits, whilst considering potential impacts when assessing proposals and policies in line with the Act's Sustainable Development Principle. The most appropriate way to implement these requirements is to adopt a placemaking approach to plan making, planning policy and decision making."*

4.13 Figure 6 depicts the PPW themes that collectively contribute to placemaking:



4.14 Paragraph 2.27 sets out how to assess the sustainable benefits of development:

"Planning authorities should ensure that social, economic, environmental and cultural benefits are considered in the decision-making process and assessed in accordance with the five ways of working to ensure a balanced assessment is carried out to implement the Well-Being of Future Generations Act and the Sustainable Development Principle. There may be occasions when one type of benefit of a development proposal or site allocation outweighs others, and in such cases robust evidence should be presented to support these decisions, whilst seeking to maximise contribution against the well-being goals."

4.15 In respect of infill and development comprising extension of settlement, Para 3.60 states that: *"Infilling or minor extensions to existing settlements may be acceptable, in particular where they meet a local need for affordable housing or it can be demonstrated that the proposal will increase local economic activity... All new development should be of a scale and design that respects the character of the surrounding area"*.

Good Design

4.16 It is set out within Paragraph 3.3 of PPW that *"Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places. 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"*.

4.17 Further detail regarding the objectives of good design is set out within Technical Advice Note (TAN) 12: Design (2016) – as detailed further below.

4.18 Figure 8 in PPW sets out the objectives of good design in an illustrative / diagrammatic manner.



Transport

- 4.19 Paragraph 4.1.1 states that the planning system should enable people to access jobs and services through shorter, more efficient and sustainable journeys, by walking, cycling and public transport.
- 4.20 Paragraph 4.1.11 outlines that *'development 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.'*

Tourism

- 4.21 Paragraph 5.5.1 of PPW11 outlines the key role that tourism can play in both advancing and protecting the built and natural environment, noting that *'Tourism can be a catalyst for regeneration, improvement of the built environment and environmental protection'*.
- 4.22 The guidance expands on this point further, noting that the planning system *'encourages tourism where it contributes to economic development, conservation, rural diversification, urban regeneration and social inclusion, while recognising the needs of visitors and those of local communities.'*
- 4.23 Paragraph 5.5.3 notes the benefits that tourism-related development can have for rural communities, outlining that *'In rural areas, tourism-related development is an essential element in providing for a healthy and diverse economy. Here development should be sympathetic in nature and scale to the local environment'*.

Economic Development

- 4.24 Paragraph 5.4.3 states that *"Planning authorities should support the provision of sufficient land to meet the needs of the employment market at both a strategic and local level."*
- 4.25 Further to this, paragraph 5.4.4 states that *"Wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration."*

The Rural Economy

- 4.26 Paragraph 5.6.4 states that *'to unlock the full potential of rural areas, planning authorities should adopt a positive approach to employment arising from foundation and innovative and technology-based sectors, including research and development, in addition to employment arising from the traditional agriculture, forestry and leisure sectors.'* In addition to this, the policy guidance outlines that proposals for diversification should also be encouraged, where appropriate, to generate new job and wealth-creating opportunities
- 4.27 Paragraph 5.6.12 sets out that *'in terms of sustainable development it should be recognised that many small rural diversification proposals providing local services will actually reduce the journey length for users who would otherwise need to travel greater distances to access these services.'* It is also considered that small rural diversification schemes can also contribute to the viability of a community by providing a focus for community life and hubs of economic activity.

Distinctive and Natural Places

- 4.28 With regards to conservation areas, Para 6.1.16 states that: *"Preservation or enhancement of a conservation area can be achieved by a development which either makes a positive contribution to an area's character or appearance or leaves them unharmed. Mitigation measures can also be considered which could result in an overall neutral or positive impact of a proposed development in a conservation area."*

Technical Advice Notes

- 4.29 TANs supplement the policy principles of PPW. TANs, which are considered relevant to the proposal, and should therefore be given weight are:

TAN	Title
TAN 6	Planning for Sustainable Rural Communities (2010)
TAN 12	Design (2016)
TAN 13	Tourism (1997)
TAN 18	Transport (2007)
TAN 23	Economic Development (2014)

Technical Advice Note (TAN) 6 – Planning for Sustainable Rural Communities (2010)

- 4.30 TAN 6 sets out guidance for farm diversification in rural communities. Paragraph 3.7.1 states that *'when considering planning applications for farm diversification projects, planning authorities should consider the nature and scale of activity taking a proportionate approach to the availability of public transport and the need for improvements to the local highway network. While initial consideration should be given to converting existing buildings for employment use, sensitively located and designed new buildings will also often be appropriate.'*

Technical Advice Note (TAN) 12 – Design (2016)

- 4.31 Detailed guidance on the objectives of good design is provided within TAN 12. The objectives of good design are set out within the following categories:

Character

- *Sustaining or enhancing local character*
- *Promoting legible development*
- *Promoting a successful relationship between public and private space*
- *Promoting quality, choice and variety*
- *Promoting innovative design*

Community Safety

- *Ensuring attractive, safe public spaces*
- *Security through natural surveillance*

Movement

- *Promoting sustainable means of travel*

Environmental Sustainability

- *Achieving efficient use and protection of natural resources*
- *Enhancing biodiversity*
- *Designing for change*

- 4.32 TAN 12 also advocates that careful and innovative design can ensure higher densities are appropriate and acceptable, this is confirmed at paragraph 5.7.4, which states the follows:

"Building at higher densities is not synonymous with high rise development and innovative good design is a prerequisite to the success of higher densities. The perception of lower density can be influenced by skilful design. Clearly defining public and private space and ensuring suitability for purpose will be particularly important where densities are high."

- 4.33 Likewise, TAN 12 advocates varying the density of the development "to create difference in the built form to which residents and visitors can relate and make it an interesting place"(paragraph 5.11.5) which can assist in creating a sense of place.

Technical Advice Note (TAN) 13 – Tourism (1997)

- 4.34 TAN 13 addresses the potential that tourism can bring to Wales. Paragraph 4 states:

'Tourism comprises a range of different but interdependent activities and operations which overlap with sport entertainment, the arts and other recreation and leisure activities. It makes a major contribution to the Welsh economy, provides employment in a variety of occupations, and can bring benefits to local economies and communities in urban and rural areas. It is subject to change in the type of holiday taken and the length of the holiday season. While it cannot be regarded as a single or distinct category or land use, the issues it raises should be addressed in preparing or revising development plans and may feature in development control decisions.'

Technical Advice Note (TAN) 18 – Transport (2007)

- 4.35 As paragraph 3.15 of TAN 18 sets out, *'Tourism proposals, particularly in rural areas, should demonstrate access by a choice of modes to avoid locking in the requirement for travel by car.'* It goes on to say, *'in rural areas a lack of public transport access needs to be balanced against the contribution tourism makes to the rural economy in the specific area.'*

Technical Advice Note (TAN) 23 – Economic Development (2014)

- 4.36 Paragraph 1.2.1 of TAN 23 outlines that *'The economic benefits associated with development may be geographically spread out far beyond the area where the development is located. As a*

consequence, it is essential that the planning system recognises, and gives due weight to, the economic benefits associated with new development.'

- 4.37 TAN 23 sets out within Paragraph 2.1.1 that *'It should not be assumed that economic objectives are necessarily in conflict with social and environmental objectives. Often these different dimensions point in the same direction. Planning should positively and imaginatively seek such 'win-win' outcomes, where development contributes to all dimensions of sustainability.'*

Summary of National Planning Policy

- 4.38 The proposed development is situated in a rural location that can be easily accessed and is considered to be sympathetic in terms of its nature and design to its surroundings. The proposal meets the requirements of national planning policy in terms of Design and Tourism. As a result, it is considered that the proposal fully complies with the provisions of national planning policy and should be regarded as an acceptable form of development.




Local Planning Policy

- 4.39 The current (adopted) Development Plan for Vale of Glamorgan consists of the following:
- Vale of Glamorgan Adopted Local Development Plan (2011-2026). On the 28th June 2017 the Council adopted the Vale of Glamorgan Local Development Plan 2011-2026.

LDP Proposals Map



Extract from LDP Interactive Proposals Map (approximate site location red)

Vale of Glamorgan Local Development Plan Proposals Map Key			
	The Site		Limestone Category 1
	Special Landscape Area (SLA)		









- 4.40 In the context of the adopted Local Development Plan (LDP), the key planning designations at the local level of relevance to the site and proposals are as follows (as indicated by the above extracts from the LDP Proposals Map):

- Located within the Special Landscape area of Duffryn Basin & Ridge Slopes; and
- Adjacent to a Mineral Safeguarding Limestone 1.

LDP Constraints Map



Extract from LDP Interactive Constraints Map (approximate site location red)

Key			
	Archaeology		Conservation Areas
	Habitat Site		Surface Water Less
	Surface Water Intermediate		Wind Speed
	Dam Zone B		Overhead Electrical Cable

4.41 In the context of the adopted Local Development Plan (LDP), the key planning constraints at the local level which are of relevance to the site and constraints are as follows (as indicated by the above extracts from the LDP Constraints Map):

- Located within a flood surface water less area;
- Located within a surface water intermediate area;
- Located within a Wind Speed area;
- Adjacent to two habitat sites;
- In close proximity to a Dam Zone B;
- In close proximity to the Vale of Glamorgan Conservation area; and
- In close proximity to an overhead electric cable.

4.42 Considering the above, it is considered that the most relevant policies of the adopted LDP for this application are as follows:

Policy	Title	Summary
SP1	Delivering the Strategy	The strategy will seek to improve the living and working environment, promote enjoyment of the countryside and coast and manage important environmental assets.
SP10	Built and Natural Environment	Development proposals must preserve and where appropriate enhance the rich and diverse built and natural environment and heritage of the Vale of Glamorgan.

Policy	Title	Summary
SP11	Tourism and Leisure	Proposals which promote the Vale of Glamorgan as a tourism and leisure destination will be favoured.
MG17	Special Landscape Areas	Within special landscape areas, development proposals will be permitted where it is demonstrated they would cause no unacceptable harm to the important landscape character of the area.
MG20	Nationally Protected Sites and Species	Development likely to have an adverse effect either directly or indirectly on the conservation value of a site of special scientific interest will usually not be permitted unless it can demonstrate how it can overcome the adverse effect.
MG29	Tourism and Leisure Facilities	The provision of all year-round tourism and leisure facilities will be favoured.
MD1	Location of New Development	New development will be directed to those locations that are accessible by sustainable transport and reduce dependence on the private car. In addition, it seeks to ensure the efficient use and reuse of land and buildings and effectively manage important resources.
MD2	Design of New Development	Development proposals should consider the design, amenity and access which together contribute to attractive, safe and accessible environments in order to create high quality, healthy, sustainable and locally distinct places.
MD8	Historic Environment	Development proposals must protect the qualities of the built and historic environment of the Vale of Glamorgan.
MD9	Promoting Biodiversity	New development proposals will be required to conserve and where appropriate enhance biodiversity interests.
MD11	Conversion and Renovation of Rural Buildings	Proposals for the conversion or renovation of existing rural buildings for rural enterprise, tourism, community or residential use will be acceptable where the proposal will not give rise to the need for a replacement building or reuse can be achieved without substantial reconstruction, extension or alteration.
MD13	Tourism and Leisure	Proposals for new tourism accommodation will be favored where the development is located in settlements identified in the settlement hierarchy or where they promote rural enterprise and / or diversification.

Supplementary Planning Guidance

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

Title	Summary
Conversion of Rural Buildings (2018)	This document sets out guidance to those seeking to convert existing rural buildings to alternative use and identifies the key policy requirements used in the determination of planning applications where the conversion of rural buildings is proposed.
Tourism and Leisure Development (2019)	This guidance sets out how tourism and leisure development proposals can provide substantial benefits for visitors, residents and the local economy.
Parking Standards (March 2019)	The guidance sets out the Council's parking standards for new development (including change of use) that are both consistent and transparent. Parking requirements are detailed according to land use and location and list requirements for commercial vehicles, cars, motorcycles and cycles.
Design Guide Wales (March 2005)	The main purpose of the document is driven to drive up the standard of design in residential development regardless of scale. It does this by providing local planning authorities with a comprehensive structure for managing the design and development processes. It also gives developers a strong basis for developing proposals with some certainty that the design objectives they are working to are the same as those accepted by the local authority.

4.44 In particular, paragraph 7.11.3 of the Council's Tourism and Development SPG advises that sustainable Low Impact Tourism proposals would be expected to have the following characteristics:

- Are sensitively located and designed to minimise their impact on water, soil and existing landscape features;
- Utilise sustainable sources of water and energy, and provide servicing without significant modifications to existing infrastructure;
- Are of an appropriate scale sympathetic to their location and surrounding uses;
- Are compatible with surrounding land uses, and do not detract from existing agricultural activities where applicable;
- Utilise existing road infrastructure without the need for highway improvements or avoid causing adverse effects on the existing highway network;

- Are accessible to sustainable modes of transport e.g. train, bus, cycle tracks and walking routes;
- Require limited supporting infrastructure such as parking;
- Contribute directly to nature conservation objectives;
- Provide opportunities to promote greater understanding and enjoyment of the natural environment and local heritage and
- Generate wider benefits to the local economy.

Local Planning Policy Summary

4.45 The comprehensive review of the planning policy context for the site and development proposed presents a number of clear conclusions as follows:

- PPW sets out a presumption in favour of sustainable development and outlines a presumption in favour of proposals in accordance with the key principles and key policy objectives of sustainable development in the planning system;
- The site is located outside the settlement limits of St. Nicholas however, the LDP recognises that a degree of development, including tourism related development, to meet the needs of existing communities such as St. Nicholas is required;
- The principle of small-scale tourism development, which is in accordance with good design standards, can be accommodated within the existing infrastructure and does not pose risk to the natural environment is welcomed by the Local Planning Authority.

5.0 PRE-APPLICATION RESPONSE

- 5.1 Pre-application discussions were undertaken with The Vale of Glamorgan Council in respect of the proposed mixed unit holiday accommodation scheme. A pre-application enquiry was submitted in July 2021, with a Site Meeting taking place on the 18th October 2021. Subsequent feedback was received on 17th December 2021.
- 5.2 The key considerations regarding the site and proposed development were outlined as follows:
- Principle of Development;
 - Access into the Site;
 - Conversion of Buildings;
 - New Buildings;
 - Camping and Caravanning Pitches;
 - Internal Access and Parking;
 - Agricultural Land Classification;
 - Trees / Ecology;
 - Surface Water Flood Risk;
 - Noise / Disturbance / Site Management;
 - Scheduled Monument;
 - Business Plan; and
 - Mineral Resources.

Principle of Development

- 5.3 Certain aspects of the proposals' principle were considered to be acceptable. The principle of the conversion of the Red Brick Building, Laundry Building, and Camping and Caravanning aspects of the proposal are all acceptable. However, *"As a whole, this would not be considered to constitute low impact tourism given the scale of the operational development proposed and the material change this will have on the character of the site."*
- 5.4 Since receiving this Pre-Application response, considerable changes have been made to the proposal, as stated throughout this statement, to align the proposal with the comments received in the Pre-Application response, and Paragraph 7.11.3 of the Vale of Glamorgan's Tourism and Development SPG (Low Impact Tourism Proposals).

Access Into the Site

- 5.5 It was noted that there is the intention to increase the width of the access to ensure appropriate width and adequate visibility for the vehicles (tourers) that are going to use it. Consideration will need to be taken in ensuring the new frontage does not appear heavily engineered or result in the loss of trees or hedgerow as this would be unlikely to be considered as creating low impact tourism.
- 5.6 A Transport Statement will be required with any planning application to address access and traffic issues, including the suitability of the access. Furthermore it will also need to consider the safety of pedestrians walking to the bus stop (on the A48) and the footway (400m) from the site, as well as promoting active travel (subject to safety considerations) and reducing the number of car journeys that could be associated with the site.
- 5.7 A Transport Statement has been completed which investigates the above concerns, and its conclusions are set out in more detail in the Material Considerations section of this statement (Section 6.0).

Conversion of Buildings

- 5.8 It is noted that the conversion of the Red Brick Building (1 bed tourism use) and smaller building adjoining (proposed to be retained for laundry and linen storage) are considered acceptable in principle (no objection).
- 5.9 It is agreed that the second grey brick building is in a dilapidated state and will require a substantial rebuild. If the structure that is present can be utilised without requiring further demolition, it may be considered acceptable (a structural survey would be needed to confirm that further demolition work wasn't required).
- 5.10 As such, a structural survey has been completed which investigates the above concerns.
- 5.11 It was asked that the existing garage was reused to accommodate the reception/front of house area and not for private use for the occupants of the house as this would result in less buildings and development. After careful consideration the client is willing to compromise and accept the garage as the reception/front of house area, and to not build a new reception/front of house cabin in order to reduce the impact of the development, and amount of buildings in the countryside/SLA. This demonstrates the applicant's willingness to deliver low impact.

New Buildings

- 5.12 Concerns were raised as the proposal involves seven new buildings in the countryside, and in a Special Landscape Area. Concerns were also raised as to whether the lodges can be considered part of a low impact tourism proposal (this will depend on their design as they are larger buildings). However it was noted that the visibility impact of these will be limited as they are in the former yard area.
- 5.13 It was acknowledged the glamping pods are much smaller in their structures and the provision of these are less of a concern. These should however appear as structures sitting within a wooded, natural area, rather than an area dominated by the pods.
- 5.14 Again it was recommended that the reception/front of house functions should be provided in the existing garage, to avoid the need to provide a further building for this purpose. The applicant duly conformed with this request.

Camping and Caravanning Pitches

- 5.15 It was accepted that the site is well screened by vegetation and the off-site visual impacts and impacts on the wider Special Landscape Area are likely to be limited. There is also no objection to the principle of providing camping and caravanning pitches (subject to minimal works being undertaken to provide the pitches and that this doesn't dominate the character of the field).

Internal Access and Parking

- 5.16 An access track is provided through the site, with a number of parking spaces on the site as well, with the intension of constructing these from a mix of 'Grasscrete' and crushed stone. Concerns were raised over the works as they seem to give the site a rather engineered appearance, however it was noted that this may be just 'on paper' (due to the Pre-App Plans). The amount of surfacing provided should be kept to a minimum (although it was accepted that the yard area already has a large concrete surface / area). Parking and manoeuvring areas should be laid out informally with use of minimal markings, signs and edging.
- 5.17 It was noted and welcomed that the surfacing has been removed from the proposal for the camping and caravanning pitches, and stressed that materials used should have the lowest possible impact, such as grass protection mats. As such the client is willing to change the

mixture of 'Grasscrete' and crushed stone to the preferred and suggested lower impact grass protection mats and gravel for the internal access road and parking spaces.

Agricultural Land Classification

- 5.18 Low impact tourism would not be expected to sterilise the best and most versatile agricultural land. This includes Grade 3a land, which is the predicted agricultural land classification for this site. This reinforces that development will only be considered acceptable if it is carried out in a way that minimises damage to the quality of the land, through the use surfaces that require minimal ground works. Given the level of development presently proposed on site, it is hard to see how any of this best and most versatile agricultural land can viably be retained for agricultural use and this would result in the loss of this finite resource.

Trees / Ecology

- 5.19 A tree survey/Arboricultural impact assessment should be provided for the whole site, and the proposal should avoid the need to fell trees regardless of whether those trees are covered by a tree preservation order. It is considered key to the proposal to be considered low impact tourism that trees, other vegetation and biodiversity are retained on the site. It is noted that additional tree planting is proposed and this is considered important to enhance biodiversity and to ensure the buildings and pitches remain as low key features within the site. This will be presented in a landscaping scheme that includes the retention of existing landscaping and habitat, supplemented by additional planting and other biodiversity enhancements.
- 5.20 A preliminary ecology survey should be provided for the whole site, as there are a number of great crested newt records in the area (which could require further survey work). In addition the conversion/demolition of buildings is likely to result in requirements for further bat surveys. An ecological survey has been completed which investigates these concerns. The survey concludes that these will not be issues. More detail on this reports findings are set out in Section 6.0 (Material Considerations) of this statement.

Surface Water Flood Risk

- 5.21 It is considered that this proposal would require a flood consequences assessment due to the risk from surface water flooding, the nature of the proposal and the proposed bridging of the water courses. Therefore, an assessment of the risk to the site from flooding has been provided and its conclusions are set out in more detail in the Material Considerations section of this statement (Section 6.0).

Noise / Disturbance / Site Management

- 5.22 The proposal has the potential to impact on the countryside through additional noise and activity disturbing the tranquillity of the area. Details of how the site will be managed to prevent such impacts should be provided. Furthermore, matters such as how security, waste disposal, additional fencing, CCTV, lighting and how bin stores will be managed should also be addressed. As such these have been addressed in the Business Plan.

Scheduled Monument

- 5.23 The site is close to the Tinkinswood Burial Chamber Scheduled Monument and consideration will need to be given to the impacts on its setting. Additional activity generated by the development and any works along the site frontage could impact on the setting of the monument.

Business Plan

- 5.24 The supportive comments received from the Tourism and Marketing Officer are noted. A business plan should be (and is) submitted as part of the planning application to show that the business is financially sound and will be economically viable going forward. This should (and does) address how the site will be managed.

Mineral Resources

- 5.25 The site is within an area reserved for its mineral resources, and development will only be considered acceptable if it is carried out in a way that minimises damage to the quality of the land, through the use surfaces that require minimal ground works and minimal digging. As such the client is willing to move away from a mixture of 'Grasscrete' and crushed stone to the preferred and suggested lower impact grass protection mats and gravel for the internal access road and parking spaces.

6.0 MATERIAL CONSIDERATIONS

6.1 The key planning considerations arising from the proposed development (considering the nature and form of the proposed development, the planning policy context and the pre-application feedback obtained, outlined within the preceding section of the Statement) are as follows:

- Principle of development;
- Landscape and Visual Impacts;
- Design;
- Access and Parking; and
- Other matters.

6.2 These issues are discussed in further detail below.

Principle of Development

6.3 As set out above, the proposed development seeks to create a mixed holiday accommodation scheme within the site boundary. A number of proposed tourist units will be sited throughout the site, comprising the development of the reuse of existing buildings, and removal of barns to provide lodges / accommodation, new glamping pods, and the installation of pitches to accommodate touring caravans. In its entirety, it is evident that the principle of tourism development is appropriate at this location – as previously outlined, the site is located within an accessible setting and is in close proximity to the settlement boundary of St Nicholas. In this way, it is evident that the site benefits from being in an accessible location – this is particularly emphasised by the presence of bus stops at walking distance and its proximity to the established retail and leisure services at Culverhouse Cross. In this way, the development of the site is in line with the aspirations of LDP Policy MD1 (Location of New Development) which notes how *'new development on unallocated sites should where appropriate promote new enterprises, tourism, leisure and community facilities in the Vale of Glamorgan'*. Crucially, this policy also notes how *'new development on unallocated sites should have no unacceptable impact on the countryside'*. Positively, as outlined by the following paragraphs which analyse the principle of development for each aspect of the proposals, the development will have no adverse impacts on the countryside designation of the site but will, instead, seek to enhance and contribute to the vernacular of the area through the medium of a vibrant and sustainable tourism offering.

6.4 LDP Policy SP10 (Built and Natural Environment) notes how *'development proposals must preserve and where appropriate enhance the rich and diverse built and natural environment and heritage of the Vale of Glamorgan including the architectural and / or historic qualities of buildings'* and *'special landscape areas.'* The site's location, and designation within a Special Landscape Area (SLA) is noted. As outlined further on in this section, it is considered that the proposed development will actively preserve the SLA's qualities as the proposals will retain the special architectural and historical importance of the rural buildings at the site whilst also enhancing the existing buildings which are currently in a state of disrepair. This will ensure that the traditional character, charm and historic heritage of the site are retained, as outlined in the *Landscape and Visual Impacts* section of this statement.

6.5 LDP Policy SP11 (Tourism and Leisure) notes how *'proposals which promote the Vale of Glamorgan as a tourism and leisure destination will be favoured'*. In fact, this policy goes on to note that *'favourable consideration will be given to proposals which enhance the range and choice of the Vale of Glamorgan's tourism and leisure opportunities, particularly through the provision of all year round facilities and a range and choice of visitor accommodation in appropriate locations'*. The proposals in their entirety present an opportunity to enhance the range and choice of the Vale of Glamorgan's tourism and leisure opportunities through the creation of a mixed unit holiday accommodation scheme. The facilities will widen the range and

choice of visitor accommodation within the Vale of Glamorgan and rural countryside to tourists. As encouraged by LDP Policy SP11 (Tourism and Leisure), the facilities will also provide all-year round accommodation to visitors (due to the provision of lodges and glamping pods). This demonstrates that the proposed development will contribute to the local economy throughout the year and not just in the summer months, encouraging increased spending and investment within the Vale of Glamorgan. In this way, the proposal satisfies Policy SP11 (Tourism and Leisure) as it promotes the Vale of Glamorgan as a tourism and leisure destination and as such should be favoured. The inherent acceptability of the proposals is confirmed by the support provided from the Vale's Principal Tourism and Marketing Officer which stated that the development is *'proposing a very healthy mix of accommodation types which will have wide appeal to the visitor market, in a location which at present lacks suitable accommodation base'*.

Zone 1 – Entrance and Arrivals

- 6.6 As outlined in the proposals section of this statement, the development proposed within Zone 1 will consist of widening the existing access, tree planting to increase biodiversity and natural screening and, finally, the conversion of the existing garage to propose a front of house / reception area. Initially, the applicant considered a new front of house / reception area yet, as advised by the Local Planning Authority during pre-application discussions, the applicant is willing to utilise the existing garage and convert this under-utilised structure into a front of house / reception area. This decision not only demonstrates the applicant's forthcoming approach in actively applying the feedback received from the Local Planning Authority but, crucially, seeks to minimise the impact of development.
- 6.7 The development activities proposed within Zone 1 of the scheme are in line with LDP Policy MD11 (Conversion and Renovation of Rural Buildings) which sets out that *'proposals for the conversion or renovation of existing rural buildings for rural enterprise, tourism, community or residential uses will be acceptable where conversion of an existing rural building would not give rise to the need for a replacement building and reuse can be achieved without substantial reconstruction, extension or alteration that unacceptably affects the appearance and rural character of the building or its setting'*. As the conversion of the garage to a front of house / reception area will require minimal building work and would not give rise to the need for a replacement dwelling, it is considered that the proposals are fully in line with the aspirations of Local Planning Policy. Furthermore, as the conversion of the garage would contribute to the visual aesthetic of the structure and its surroundings and has been actively proposed by the Local Planning Authority, it is considered that the principle of development proposed within Zone 1 is entirely appropriate and necessary at this location.

Zone 2 – Yard & Lodges

- 6.8 As previously outlined in the proposals section of this statement, the development proposed within Zone 2 will consist of the conversion of 2 existing buildings into 1 bed accommodation, and the replacement of the large dilapidated corrugated barn and shipping containers (which are located on the concrete hardstanding) with 2 double unit lodges. The development proposed within Zone 2 will also include 4 glamping pods on the eastern side of the site.
- 6.9 As previously outlined, the first building to be converted is the red brick outbuilding – as confirmed by the Local Planning Authority in the pre-application statement, this building appears to be in *'reasonable condition'*. Similarly, as outlined in the pre-application response, the second building to be converted (the grey brick building) is *'relatively small and close to the existing house within the former yard area'*. The replacement element of the development proposed within Zone 2 is supported by LDP Policy MD11 (Conversion and Renovation of Rural Buildings) which, as previously outlined, notes how proposals for the conversion of existing rural buildings are acceptable where their conversion would not give rise to the need for a replacement building and where their reuse can be achieved without substantial reconstruction, extension or alteration that unacceptably affects the appearance and rural character of the

building or its setting. As the proposed conversion of the existing under-utilised buildings on site will be for the provision of tourist accommodation, it is evident that the conversion will not give rise to the need for a replacement building. Similarly, the work involved for the proposed conversion will be fairly minor in nature to ensure that the appearance and rural character of the buildings is preserved. In this way, the proposal will sensitively retain the rural appearance of the structures whilst, crucially, bringing the barns and buildings out of disrepair. LDP Policy MD17 (Rural Enterprise) also provides guidance on development within rural settings and notes how *'proposals for the development of small scale employment uses that promote rural enterprise will be permitted where the proposal is located within a minor rural settlement'* or *'involves the conversion of an existing rural building in accordance with Policy MD11'*. As previously outlined, the proposals will convert the existing rural buildings resulting in the creation of small-scale employment for the applicant in line with the aspirations of LDP Policy MD17 (Rural Enterprise). This goes on to state that the Local Planning Authority *'recognises that in order to breathe new life into the rural economy it is necessary to maximise the opportunities for small scale, sustainable employment to take place outside the larger settlements of the Vale of Glamorgan'*. In this way, it is considered that the proposal represents an opportunity to fulfil this by promoting rural enterprise in the rural Vale of Glamorgan and creating employment opportunities. This approach is wholly compliant with LDP Policy MD11 (Conversion and Renovation of Rural Buildings), LDP Policy MD17 (Rural Enterprise) and, crucially, with the aspirations of National Planning Policy as both PPW and Future Wales consider the importance of sustaining vibrant rural communities and contributing to rural businesses.

- 6.10 The acceptability of the conversion of the buildings within Zone 2 is confirmed by the pre-application dialogue which took place with the Local Planning Authority. Through the medium of these discussions, there was *'no objection'* to the conversion of these which was deemed by the Local Planning Authority *'acceptable in principle'*. To further alleviate any concerns regarding whether the grey-brick building can be utilised without requiring further demolition, a structural survey was commissioned. M.A.REES Construction can confirm that "the existing concrete foundation slab and brickwork walls to the existing partially collapsed out building are in a structurally sound condition".
- 6.11 The replacement of the large barn with two double lodge units, as outlined in the pre-application response received from the Local Planning Authority, will be in *'the former yard area'*. In this way, their development would be restricted to a part of the site which has already been developed on and benefits from hard surfacing material as opposed to undeveloped land in the countryside – this approach is in line with LDP Policy MD1 (Location of New Development) which notes how new development on unallocated sites should *'have no unacceptable impact on the countryside'* and *'where appropriate promote new enterprises, tourism, leisure and community facilities in the Vale of Glamorgan'*. As the large barn is in a state of disrepair, it is evident that its replacement will provide a betterment, in visual terms and, crucially, represents a form of *'small scale employment uses that promote rural enterprise'* in line with the aspirations of LDP Policy MD17 (Rural Enterprise).
- 6.12 The four glamping pods proposed on the eastern side of the site are compliant with LDP Policy SP11 (Tourism and Leisure) which seeks to favourably consider proposals which *'enhance the range and choice of the Vale of Glamorgan's tourism and leisure opportunities, particularly through the provision of all year round facilities and a range and choice of visitor accommodation in appropriate locations'*. Similarly, as outlined by this policy, it is evident that the proposals in question would seek to *'promote the sustainable use of the countryside'* – this is particularly evident when considering the modest nature of this element of the proposals. This is confirmed in the pre-application response received from the Local Planning Authority which acknowledges that *'the glamping pods in themselves are much smaller structures and their provision is less of a concern in itself'*. In this way, as confirmed by the Local Planning Authority, it is considered that this element of the proposals is also wholly acceptable in principle and will, in fact, contribute to the provision of an attractive and vibrant tourism offering in the

area in line with the aspirations of National and Local Planning Policy. Crucially, the proposals are also in line with the Vale of Glamorgan's Tourism and Leisure Development SPG which seeks to provide 'good practice example of local tourism and leisure developments'. The tourism element of the proposals are also assessed against paragraph 7.11.3 of the Vale of Glamorgan Council's Tourism and Development SPG in the following section.

Zone 3 - Touring and Camping

6.13 As previously outlined in the proposals section of this statement, the development proposed within Zone 3 will consist of 14 touring and camping pitches. This development is proposed to take place on the existing well-enclosed paddock for touring and caravan pitches. The pre-application response highlighted that 'any tourism scheme for the site will have to be designed giving full consideration to how it complies with' the criteria set out in paragraph 7.11.3 of the Vale of Glamorgan Council's Tourism and Development SPG. As previously set out, this area encompasses open space whereby it does not benefit from any existing building structures which can be retained and reutilised for accommodation. Therefore, this form of temporary accommodation is proposed to soften the development, remove any risk of perceived overdevelopment, ensure that the proposals follow the existing built form, and crucially, ensure that the proposals qualify as low impact tourism in line with the Council's Tourism and Development SPG.

6.14 Paragraph 7.11.3 of the Vale of Glamorgan's Tourism and Development SPG advises that sustainable low impact tourism proposals would be expected to have certain characteristics. For ease, the Vale of Glamorgan's Tourism and Development SPG has been extracted below:

"Typically, sustainable low impact tourism and leisure proposals will exhibit the following attributes:

- Are sensitively located and designed to minimise their impact on water, soil and existing landscape features;*
- Utilise sustainable sources of water and energy, and provide servicing without significant modifications to existing infrastructure;*
- Are of an appropriate scale sympathetic to their location and surrounding uses;*
- Are compatible with surrounding land uses, and do not detract from existing agricultural activities where applicable;*
- Utilise existing road infrastructure without the need for highway improvements or avoid causing adverse effects on the existing highway network;*
- Are accessible to sustainable modes of transport e.g. train, bus, cycle tracks and walking routes;*
- Require limited supporting infrastructure such as parking;*
- Contribute directly to nature conservation objectives;*
- Provide opportunities to promote greater understanding and enjoyment of the natural environment and local heritage and*
- Generate wider benefits to the local economy."*

6.15 Each characteristic / criterion, and how the development activities proposed in Zone 3 (touring and camping) and Zone 2 comply with these, is addressed in turn below.

Sensitively located and designed to minimise their impact on water, soil and existing landscape features

The proposal has been carefully and sensitively configured from the outset to minimise the impact on water, soil and existing features. The softer tourism (less permanent accommodation) has been located in Zone 3 (at the north of the site) in the soft landscape areas, whereas the larger lodges are located on the existing developed (concrete hardstanding) sections of the site (Zone 2). In this way, a softer non-invasive tourism offer is proposed in

Zone 3 whereas the larger structures proposed in Zone 2 will have a minimal effect on water, soil and existing landscape features by virtue of being located on the already present concrete hardstanding (yard area). This approach therefore respects the above criterion and seeks to ensure the lowest possible impact on water, soil and existing landscape features through the medium of the sensitive siting of the different elements of the scheme.

Utilise sustainable sources of water and energy, and provide servicing without significant modifications to existing infrastructure

In light of their modest nature, the proposals will not require significant modifications to existing infrastructure and will, instead, be holistically and sensitively accommodated throughout the site. Similarly, through the provision of a Sustainable Urban Drainage Systems (SuDs), the proposals seek to utilise sustainable methods to manage water run-off in and around the site.

Are of an appropriate scale sympathetic to their location and surrounding uses;

The proposal is looking to significantly reduce the scale of the built form at the location (to provide something more sympathetic to the locations and its surroundings). For example, within Zone 2, the proposals seek a reduction in scale from a large unsightly dilapidated corrugated barn and the large shipping containers. This marks an evident reduction in size and scale from what is presently at the site to something that is more sympathetic and in-keeping with the surrounding areas. More details on the scale of the proposals, and their modest nature, can be found in the development proposals section of this statement. In light of the applicant's understated approach, it is therefore evident that the proposals comply with the above criterion.

Are compatible with surrounding land uses, and do not detract from existing agricultural activities where applicable;

The land proposed to be used for the Touring and Camping element of the proposal is classed as grade 3a land. However, it must be noted that the land has never been utilised for agricultural activities, and its development for tourism uses would not lead to loss of agricultural land as the applicant does not foresee to use or sell the land for agricultural purposes at present or any point in the future.

Utilise existing road infrastructure without the need for highway improvements or avoid causing adverse effects on the existing highway network;

It is considered that the current access is sufficient to accommodate vehicular movements to and from the site as this access served the works associated with the construction of the proposals associated with planning application 2016/00036/FUL with heavy machinery moving safely to and from the site. However, the applicant's conscientious approach seeks to widen the existing access to 7.3m to achieve a two-way access at the junction to the main road. This is to ensure the safety and visibility of / for the turning of tourers. As such, this improvement is not needed, but actively sought in the interest of highway safety and, crucially, it has gained officer support in the pre-application response issued by the Local Planning Authority which also noted how a transport statement would be required. As such, a Transport Statement has been produced by Apex Transport Planning Ltd to assess the suitability of the access and address any concerns regarding visibility and highway matters. The transport statement states that "*the development would not materially change the conditions on the network*", with the access providing "*appropriate geometry to accommodate all vehicle movements safely and suitably*", and "*not have a material impact on the operation of the highway network or an unacceptable impact on road safety*". It also ensures "*two-way movements can be accommodated appropriately and minimise the potential for vehicles blocking back to Duffryn Lane*", and that it has been designed "*in accordance with TAN18 and MfS guidance*". In light of this, it is evident that the proposal complies with the above criterion.

Are accessible to sustainable modes of transport e.g. train, bus, cycle tracks and walking routes;

The inherent sustainability of the site is considered in the Sustainability Section of this statement as well as the Transport Statement produced by Apex Transport Planning Ltd. These sections note that due to the extensive walking routes in the area, the cycle hire scheme proposed, and the proximity to bus stops, it is considered that the proposal complies with the above characteristics.

Require limited supporting infrastructure such as parking;

The proposal is providing limited parking spaces, and this is only where necessary (i.e. 1 space per unit of accommodation). It is therefore considered that the proposal complies with the above characteristic.

Contribute directly to nature conservation objectives;

As previously outlined, the proposals seek the replacement and enhancement planting of trees, whilst adding and maintaining a wild grass meadow in Zone 3 of the site. The Landscaping Plan demonstrates the applicant's intentions to contribute to nature conservation objective and enhance the SLA designation of the site. It is therefore considered that the proposals comply with the above characteristic.

Provide opportunities to promote greater understanding and enjoyment of the natural environment and local heritage;

The proposals seek to establish a rural enterprise as well as maximise the existing features of natural and local heritage importance. It is the applicant's intention to encourage visitors who visit the premises to visit nearby attractions – for example, Tinkinswood Burial Chamber (0.5km), and National Trust – Dyffryn Gardens (1.3km) – and invest within the Vale of Glamorgan, as outlined below. In light of this, it is considered that the proposal complies with the above characteristic.

Generate wider benefits to the local economy

Due to the locality of the proposal and its proximity to tourist attractions (National Trust – Dyffryn Gardens), local heritage sites (Tinkinswood Burial Chamber) and wider services and facilities (the settlement of St Nicholas and nearby facilities such as Culverhouse Cross), it is clear that the proposals can lead to benefits to the local economy as visitors will engage in cross trips to and from these services. Investment in these facilities and attractions will undoubtedly lead to a positive multiplier effect, thus having indirect employment opportunities in the rural Vale, helping to further benefit the local economy. As the proposal provides all year-round accommodation to visitors, the development will therefore contribute to the local economy throughout the year and not just in the summer months. It is therefore considered that the proposal complies with the above characteristic.

- 6.16 In light of the above, it is therefore considered that the proposal complies with each relating characteristic of the Council's tourism and Development SPG – Low Impact Tourism and satisfies the policy overall

Landscape and Visual Impacts

- 6.17 Policy MG17 (Special Landscape Areas) outlines that within special landscape areas, 'development proposals will be permitted where it is demonstrated they would cause no unacceptable harm to the important landscape character of the area'. In terms of the visual impact of the proposals, the site is well screened by existing mature trees and hedgerows at all boundaries. In light of this, views onto the site are considerably restricted and such, the

proposal will have a minimal visual impact upon the landscape character of the SLA. This was accepted and confirmed in the pre-application response which noted how *'the site is well screened by vegetation and the off-site visual impacts and impacts on the wider Special Landscape Area are likely to be limited'*. In order to protect and enhance the SLA designation, the development proposals seek to provide further screening through the retention of the existing vegetation at the site's boundaries as well as the planning of additional trees.

- 6.18 A Landscaping Plan has been produced to show the retention of the existing landscaping and habitat features, and to show the enhancement tree planting and landscaping measures proposed. The retention of features of landscape interest as well as the introduction of new ones represents an integral part of the proposals. This is particularly evident when considering that the applicant is proposing a wildflower and wild grass meadow to enhance biodiversity and maximise sensitive natural screening throughout the site. This approach is in line with LDP Policy SP10 (Built and Natural Environment) which notes how *'development proposals must preserve and where appropriate enhance the rich and diverse built and natural environment and heritage of the Vale of Glamorgan including special landscape areas'*.



Extract from the Landscaping Plan showing the wildflower / wild grass meadow, and enhancement tree planting

- 6.19 In terms of the nature of the proposal, it is considered that the design elements of the proposed accommodation, such as the siting, orientation and layout are acceptable in that they ensure there is a low visibility impact, and that the special qualities and characteristics of the SLA are protected. This was acknowledged in the pre-application response which noted how the lodges *'are on the former yard area and that their visibility off site is going to be limited'*. For reference, the landscaping scheme further highlights how the visual impact of the new build elements of the scheme will be reduced and minimised to ensure a negligible impact.

- 6.20 Moreover, the proposals would result in the demolition and removal of a substantial number of large, unsightly buildings and structures (which actively detract from the SLA designation) to smaller, more contained structures. This will lead to a considerable improvement of the site's appearance as these are more sympathetic and have a lower impact (by way of size, scale and screening) and are in keeping with the surrounding area (SLA). Overall, the proposals would provide an opportunity to provide an attractive re-development of the site enhancing its visual character and appearance.
- 6.21 Given the above, it is considered overall that the development represents a sensitive proposal which will have no unacceptable impact upon the special qualities of the SLA designation.

Design

- 6.22 Whilst the exact design of the tourist accommodation units, comprising materials, scale, height, mass and other elements, are yet to be confirmed, the design of the proposed scheme will be sympathetic and sensitive to its surrounding natural and built environment. The design of the pods will be of an acceptable rural appearance and character – which will conform to its setting. The accommodation will re-use and utilise materials appropriate to its built and natural setting, and will replicate the existing built form on site. This approach is in line with LDP Policy MD2 (Design of New Development) which notes how development proposals should *'respond appropriately to the local context and character of neighbouring buildings and uses in terms of use, type, form, scale, mix and density'*.
- 6.23 The design of the units will also be sympathetic to the existing buildings adjacent to the site, which are in the applicant's ownership. This will allow the units to be of appropriate and sensitive appearance which accords to its surroundings and ensure that there is no material impact upon the rural appearance and character of the area. As such, the development's impact upon its surroundings will be minimal and, in turn, acceptable.
- 6.24 Indicative Proposed Plans of the types of Lodges and Pods have been submitted alongside this statement, with images depicting what these will look like shown in the Development Proposals section.
- 6.25 The proposed units are to be sited around the periphery of the site (particularly in the southern area), to maintain the openness of the site, as well as ensuring the views from north to south are maintained. The proposal seeks to retain all existing hedgerows and trees along its boundary and within the site. Further landscaping is proposed to provide additional tree and planting within the site, to enhance biodiversity and ensure that the proposed accommodation units are well screened.
- 6.26 The proposed design and sitting of the Glamping units allows them to naturally sit and fit in within its rural and natural surrounding landscape as it takes account of the site's existing features, utilising materials appropriate to the rural appearance and character of the area. This complies with Pre-Application discussions had with the Vale of Glamorgan Council who stated that *"the pods should appear as structures sitting within a wooded, natural area, rather than an area dominated by the pods"*.



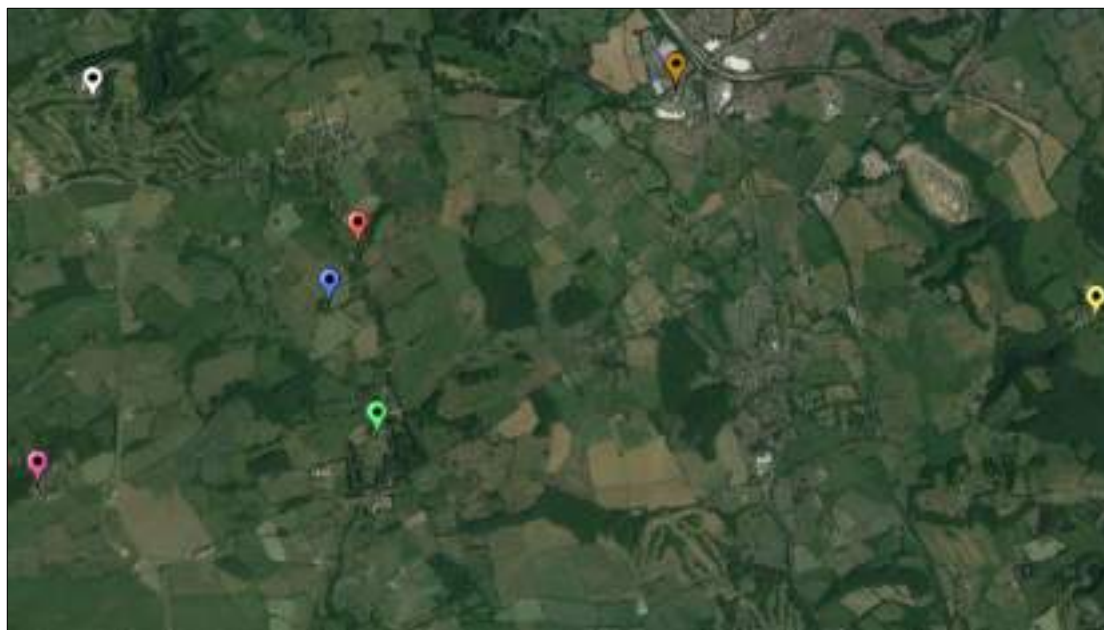
Extract from the Landscaping Plan showing Glamping Pods sitting within a wooded, natural area

- 6.27 Overall, it is considered that the design of the proposals is appropriate at this location and in-keeping with the aspirations of LDP Policy MD2 (Design of New Development) which notes how development proposals should *'be of a high standard of design that positively contributes to the context and character of the surrounding natural and built environment and protects existing features of townscape or landscape interest'*.

Highways Access and Parking

- 6.28 It is considered that the current access is sufficient to accommodate vehicular movements to and from the site, as this access was used as the main access for the construction works relating to planning application 2016/00036/FUL, with heavy machinery moving safely to and from the site. In order to provide a betterment, and ensure the sustained amenity of road users, the applicant is proposing to widen the existing access to 7.3m. This is in the interest of achieving a two-way access at the junction to the main road to ensure the safety and visibility of / for the turning of tourers. This element of the scheme was welcomed by the Local Planning Authority in their pre-application response which requested for a transport statement to be prepared to accompany the formal planning application. As such a Transport Statement has been produced (by Apex Transport Planning Ltd). This document, which accompanies the submission, considers the suitability of the proposed access and considers factors such as visibility, traffic and the impact of the development on transport trips. In this way, as confirmed by the transport statement, it is evident that the proposals are in line with LDP Policy MD2 (Design of New Development) which notes how *'development proposals should have no unacceptable impact on highway safety nor cause or exacerbate existing traffic congestion to an unacceptable degree'*, and *'in line with transport policies in Future Wales and PPW11, TAN18 and the VoGC Local Development Plan'*.
- 6.29 As previously outlined, the site benefits from proximity to established bus routes and accessibility to nearby services and facilities. In this way, despite falling outside of the settlement boundary, its sustainable location is recognised. Notwithstanding this, the use of private vehicles for customers of the proposed tourism accommodation is acceptable as it would be expected in settlements such as St Nicholas – as such, it is expected that the establishment

of this small rural enterprise in terms of vehicle trips and traffic *"would not have a material impact on the operation of the highway network or an unacceptable impact on road safety"* (*"predicted to generate a maximum of 10 vehicle movements in an hour which would equate to approximately 1 vehicle every 6 minutes, on average"*).



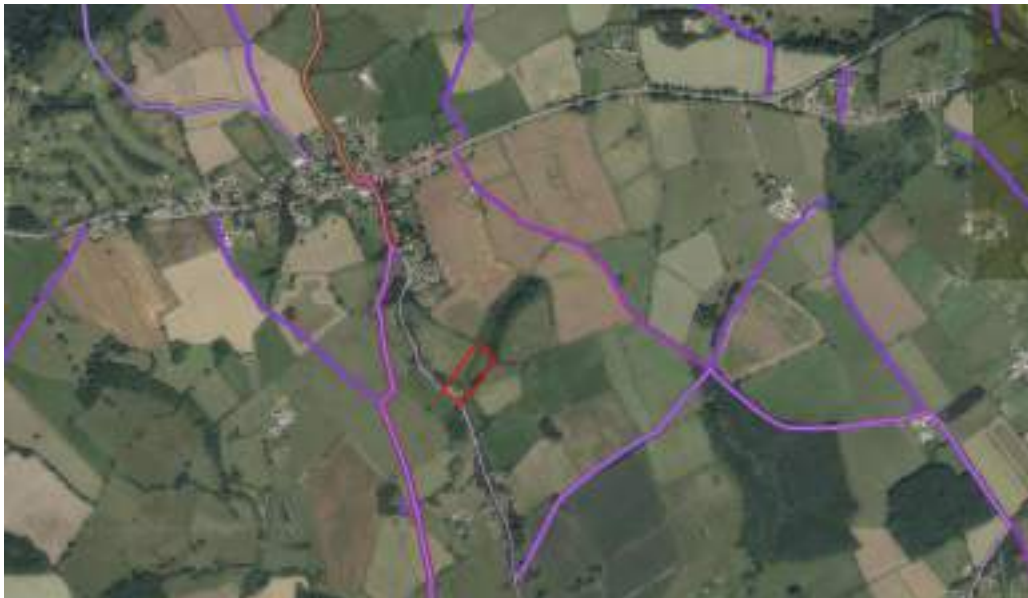
Sustainability map

Key					
Site		Tinkinswood Burial Chamber		National Trust – Dyffryn Gardens	
Cottrell Park Golf Resort		Salmons Leap		The Amelia Trust Farm	
Supermarkets					

6.30 As shown in the sustainability map above, the site is in close proximity to a number of tourist attractions, as demonstrated in the list below:

- National trust – Dyffryn Gardens – 1.3 km;
- Cottrell Park Golf Resort – 2.5 km;
- Tinkinswood Burial Chamber - 0.5 km;
- The Amelia Trust Farm – 5 km;
- Salmons Leap – 13.5 km; and
- Supermarkets (Tesco, Aldi etc) – 8.5 km.

6.31 In addition to the site being in close proximity to a variety of tourist activities, it is also situated approximately 1.28 km from the nearest settlement, St. Nicholas and 4 km from Culverhouse Cross which contains a variety of services and facilities such as shops and a number of supermarkets which would be beneficial to future guests.



Walks and trails (approximate site location in red)

Key					
	Haunted Field Walk		Millennium Heritage Trail		Footway

6.32 As shown in the map above there are a number of established walking routes that are in close proximity. These are listed below:

- Haunted Field Walk – Length 7.5 miles; and
- Millennium Heritage Trail – Length 100 km.



Vale of Glamorgan Haunted Field Walk – Walking in the Vale (site in red)

- 6.33 The above Walking Maps, published by the Local Authority, highlight the site's proximity to established walking routes.
- 6.34 It was stated in the Pre-Application response that the proposal needed to consider the safety of pedestrians walking to the bus stop (on the A48) and the footway (400m) from the site, as well as promoting active travel (subject to safety considerations) and reducing the number of car journeys that could be associated with the site. As such, a Transport Statement (prepared by Apex Transport Planning Ltd) has been completed which investigates the above concerns.
- 6.35 The Transport Statement highlights firstly that *"Duffryn Lane already operates as a shared route with no evidence of a road safety issue, the recorded speeds and flows are low, carriageway widths provide sufficient space for passing vehicles, step off areas are provided, and forward visibility is acceptable for the observed speeds, Duffryn Lane is considered suitable for shared use by pedestrians, cyclists, and vehicles. This is in accordance with Welsh Government, Manual for Streets and DfT guidance. On this basis, the site is appropriately connected for access by walking and cycling by safe and suitable routes"*.
- 6.36 It goes on to state that *"the site is therefore situated in a location which offers the potential for access by walking, cycling and public transport. Visitors can walk or cycle to key facilities and services within appropriate distances, which would help to reduce the need to travel by car. This level of movements would not have a material impact on the capacity of the local highway network and on the operation of local junctions."*
- 6.37 To facilitate the ability to cycle to these facilities, the proposal looks to include a 'Cycle Hire' scheme, *"The site will also provide a bike hire scheme which can accommodate up to 10 cycles. This will encourage visitors to cycle to and from the site once they have arrived, particularly for those that are unable to bring cycles with them to the site. This demonstrates the applicant's commitment to encouraging sustainable travel"*. As such, this will increase the sustainability of the proposal and site, as well as creating a *"realistic choice of modes of travel for all journey purposes, which will assist in constraining the level of vehicle generation from the site and*

minimise the impact of the development". In this regard, the "site location is consistent with the sustainable transport policies in Future Wales and PPW11".

6.38 It is therefore considered that due to the many already established walking routes (created and promoted by the LPA), the proposed cycle scheme (that aims to further improve the sustainability of the site), and the Transport Statement that allays any safety concerns that arise from the site's / proposals sustainability, the proposal is significantly more sustainable than it was, and is the most sustainable that it can be considering its location.

Flood Risk

6.39 Consultation of the Natural Resource Wales Flood Risk map indicates that the site falls within a Zone A, an area considered to be at little or no risk of fluvial or coastal/tidal flooding, as the site falls within Flood Zone A. As such, a tourist development is acceptable in this location, in terms of Flood Risk.



Extract from NRW Flood Risk Mapping System (approximate site outline red)

NRW DEVELOPMENT ADVICE MAP KEY		
	Zone C2	Zone B
		Zone A

6.40 Despite this, it was considered that a Flood Consequence Assessment was needed after Pre-Application dialogue with the Vale of Glamorgan due to the risk from surface water flooding and bridging of the water course (small stream) that runs through the site. As such a Drainage and Flood Risk Assessment has been prepared by HydroGeo.

6.41 The key points of this report have been extracted and state that *"the proposed development is appropriate at this location"* as *"the site is unlikely to flood except in extreme conditions"* and as such *"the proposed development will have no impact on flood risk"*. In fact the flood consequence assessment states that *"the proposed development will provide a betterment compared to the existing situation"*.

6.42 As mentioned previously, concerns were raised by the LPA in their Pre-Application response, especially in relation to surface water flooding. As outlined in the pre-application response, *"due to the risk from surface water flooding, the nature of the proposal and the proposed bridging of the water courses, an assessment of the risk to the site from flooding should still be provided in this case"*. It was concluded in the FCA *"that fluvial and surface water flooding poses a low*

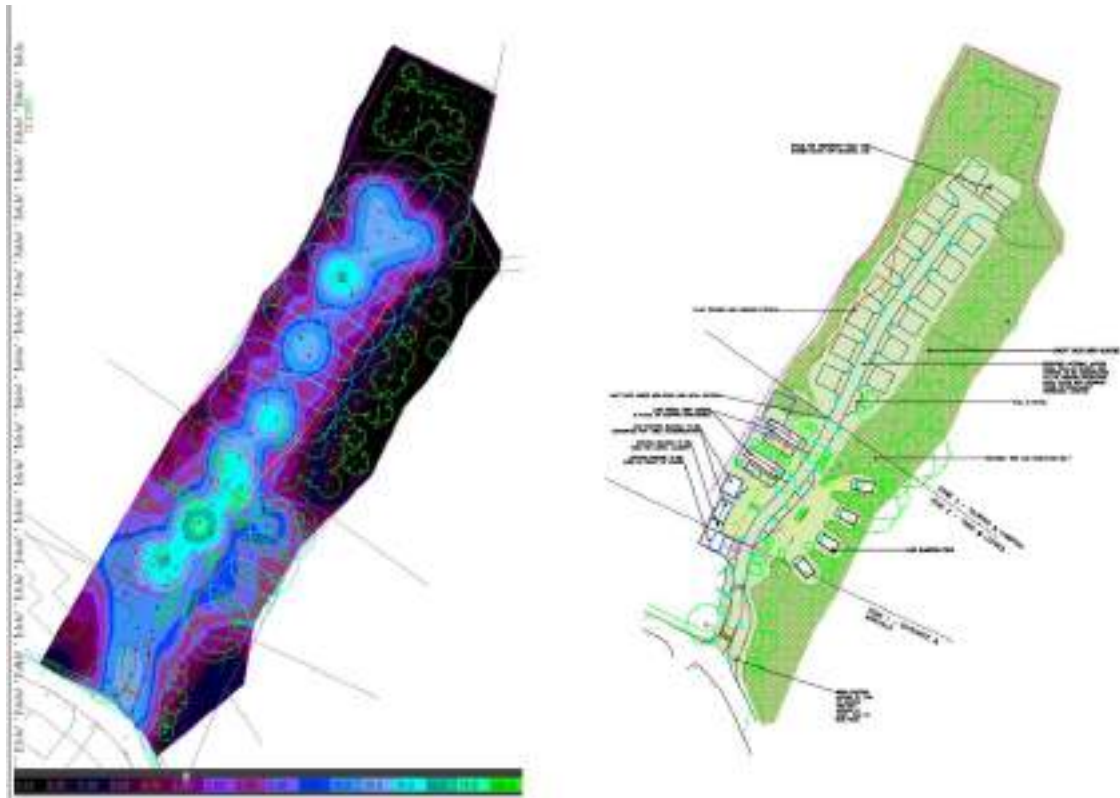
flood risk to the site. Therefore, the risk of fluvial and surface water is considered to be of low significance". As such this should allay any concerns had from the LPA, and potential issues on this matter.

- 6.43 Ultimately the report concludes that *"the development would be in accordance with the requirements of TAN15"*, and that *"this FCA demonstrates that the proposed development would be operated with minimal risk from flooding, would not increase flood risk elsewhere and is compliant with the requirements of TAN15. The development should not therefore be precluded on the grounds of flood risk."* In light of the information contained in the report prepared by Hydrogeo, it is considered that the proposals are compliant with LDP Policy MD7 (Environmental Protection) which notes how *'development proposals will be required to demonstrate they will not result in an unacceptable impact on people, residential amenity, property and / or the natural environment from' factors such as 'flood risk and consequences'.*
- 6.44 In line with Schedule 3 of the Flood and Water Management Act (FWMA) 2010, all new developments with a construction area over 100m² will need to manage surface water using Sustainable Urban Drainage Systems (SuDs). All surface water drainage systems will need to comply with mandatory National Standards for sustainable drainage (SuDs) and be approved by the new SuDs Approval Body (SAB). As required by the legislation, the applicant will advance a separate SuDs application at the appropriate stage prior to beginning construction.

Ecology

- 6.45 A Preliminary Ecological Appraisal was undertaken by I&G Ecological Consulting. This document recognises that areas of the site benefit from conservation value and recognises that the proposal seeks to *'develop an immersive wildlife experience and retain and enhance high value habitats'.* The advice provided in this report, for example relating to the implementation of hedgerows, will be fully taken on board and applied by the applicant. For example, new native hedgerows will be established (in light of their *'high conservation value'*) and incorporated into the development to connect the roadside and eastern hedgerow, as well as fill the current *'gappy'* hedgerows, with the suggested mix of primarily hazel (30%), blackthorn (20%) and hawthorn (20%), with the remainder made up of a mixture of holly, rowan, silver birch and wayfaring tree. This recommendation aligns, and corresponds with, the Tree Survey / AIA that advises the *"re-planting of 12 replacement trees occur on field boundaries (hazel, hawthorn, and field maple)"*. This will therefore be a priority which the applicant seeks to implement as soon as possible.
- 6.46 A separate Reptile and Amphibian Mitigation Plan has been developed after the PEA stated *"a Reptile & Amphibian Mitigation Plan should be developed by a suitably qualified ecologist to encourage species away from working areas and to maximise the potential for the site"*, as reptile and amphibian interest *"is likely to be good"*. While, the Pre-Application response noted that *"there are a number of great crested newt records in the area and it is considered that this is likely to require further survey work"*, it must be noted that the ecological report suggests that the presence of these is considered *"low given the lack of standing water and ponds in the near vicinity"*. Nonetheless the Reptile and Amphibian Mitigation Plan has been developed to encourage species away from working areas and to maximise the potential of the site so that it becomes an immersive wildlife experience and to retain and enhance high value habitats. This approach is in line with LDP Policy MD9 (Promoting Biodiversity) which notes how *'new development proposals will be required to conserve and where appropriate enhance biodiversity interests'.*
- 6.47 The proposal will also seek to install a number of bat and bird boxes, for example in the hedgerows, after this was recommended in the ecological report. A Lighting Plan has also been instructed and is submitted to limit the impact sight lighting has on bats. This impact aims to be limited through the use of low level cowled lighting and the retention of dark corridors features along the boundary (as suggested in the ecological report).

- 6.48 The Lighting Scheme gives an average of 7lux, with 5-10lux being recommended by the CIBSE (Chartered Institute of Building Services) Lighting Guides. The submitted Lighting Plan is acceptable as it shows that *"the main lighting is only in the areas which will be used, and there is no light spill onto the wildlife areas"*, ultimately retaining the dark corridors along the boundary features.



Lighting Scheme produced by SABA

- 6.49 The above demonstrates that ecological protection and enhancement are at the forefront of the proposals. This is to ensure that no detrimental impacts arising from development are caused and to encourage biodiversity enhancement at the location. In light of this, the proposals are compliant with the aspirations of National and Local policy and, in particular, LDP Policy MD9 (Promoting Biodiversity).

Historic Environment

- 6.50 The extract below is taken from the Historic Wales mapping system and demonstrates that there are no Listed Buildings or Scheduled Ancient Monuments on the site. It is noted however that the Tinkinswood Burial Chamber Scheduled Monument is located approximately 0.3 miles away.

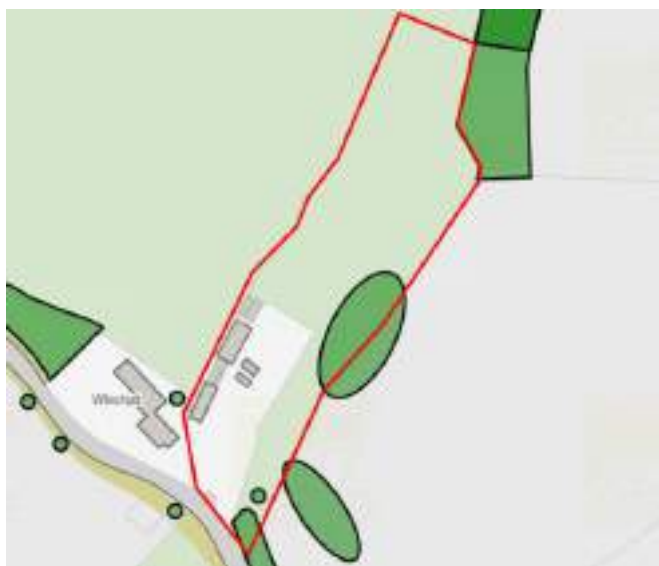


Extract taken from Historic Wales Website (Approximate site location red)

- 6.51 From Pre-Application Dialogue with the LPA potential concerns were raised over the potential impact from *"additional activity generated by the development and any works along the site frontage ... on the setting of the monument. This will need to be considered and addressed"*.
- 6.52 The Transport Statement produced by Apex Transport Planning Ltd considers the suitability of the access and visibility as well as traffic matters and trips generated by the development. The report notes that the number of transport trips generated will be *"negligible"* thus meaning that *"no material impact"* will be caused on the setting of the monument. In light of this, it is evident that the proposals would not harm the scheduled ancient monument and are therefore in line with LDP Policy SP10 (Built and Natural Environment) which notes how *'development proposals must preserve and where appropriate enhance the rich and diverse built and natural environment and heritage of the Vale of Glamorgan'*.

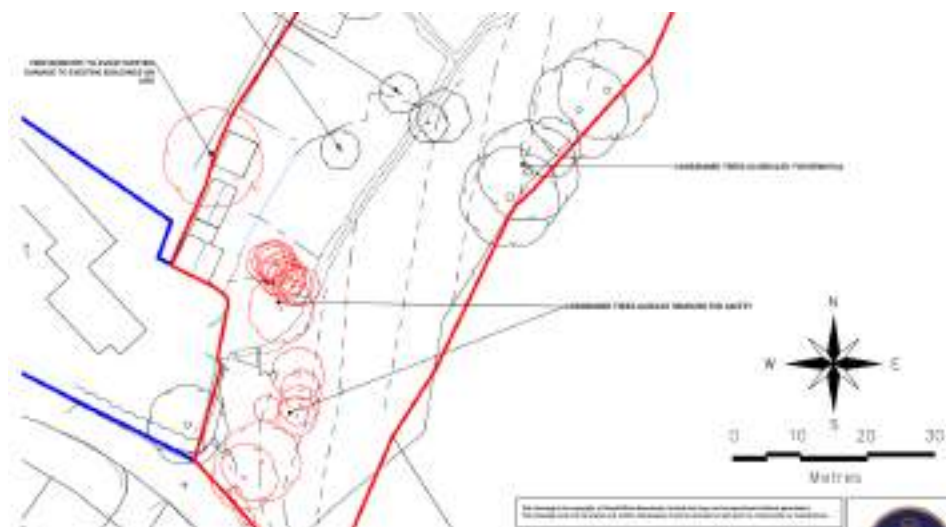
Tree Preservation Order (TPO)

- 6.53 An extract taken from the Vale of Glamorgan interactive map shows that the site is subjected to TPO's on and adjacent to the site.



Vale of Glamorgan TPO Map (approximate site boundary in red)

- 6.54 Due to the site's apparent TPO constraints, this has been given important consideration, and as such a Tree Survey has been produced by 'Treecare Consulting'. It is considered that no TPO trees will be adversely impacted by the proposals.
- 6.55 The AIA produced describes the site as "a simple site in terms of trees". The Tree of the most significant importance is labelled T1 on the Site Plan (Tree Quality – B, Moderate Quality). This is "set back from the main site area" and is "located behind the watercourse". This watercourse runs north to south and "separates rooting areas from the site" meaning the "woodland does not conflict with work on site". As such the TPO Tree is protected as "T1's rooting area is located behind the watercourse". Therefore "no ground protection is required" and the TPO will "not be affected by the proposal".
- 6.56 Unfortunately, trees G7 require "felling due to ash die back as the trees are stage 2+ and in decline". G3 trees will also be required to be removed as these are also ash infected and entwined with scrap metal. These are highlighted below:



6.57 The proposal will therefore follow the advice given and will *"ensure re-planting of 12 replacement trees occur on field boundaries (hazel, hawthorn, and field maple)"*, as shown in Planting Location Plan in the submitted Landscaping Plan. The proposal will therefore lead to a betterment at the site as these unsafe and dangerous trees (to the *"landowner, adjacent land owner and the tree work contractor"*), and declining trees will be removed and replaced with safe and healthy ones. This approach is in line with LDP Policy MD2 (Design of New Development) which notes how *'development proposals should be of a high standard of design that positively contribute to the context and character of the surrounding natural and built environment and protects existing features of townscape or landscape interest'*.

Other Matters

Covid-19 Impact on Tourism

6.58 In the past two years, Covid-19 has had a significant negative impact on both global and local economies that has seen the tourism industry severely affected. Tourism and hospitality have both been widely reported to have been the worst industries to be affected financially by the pandemic. In particular, local communities within rural areas which rely on tourism making up a large source of income have been significantly impacted. As a result of Covid-19, foreign travel has been restricted, which has led to an increase in UK residents staying within the UK to go on holiday.

6.59 The initial impact on tourism in the UK resulted in many tourist businesses and workers being significantly affected including closures and loss of jobs. As such, this proposal will help to tackle this ongoing problem by creating new tourist accommodation diversifying the rural economy within the rural area. The proposal will lead to an increase in tourists in the area which in turn will increase local spending. This will help to support local businesses who have suffered significantly within the past year as a result of the pandemic. Therefore, it is considered that the proposed development will contribute to both the viability and vitality of the Vale of Glamorgan in line with the aspirations of LDP Policy SP11 (Tourism and Leisure) which notes how *'proposals which promote the Vale of Glamorgan as a tourism and leisure destination will be favoured.'* In particular, this policy notes how favourable consideration will be given to proposals which *'enhance the range and choice of the Vale of Glamorgan's tourism and leisure opportunities'* and *'favour rural diversification and the local economy'*.

7.0 SUMMARY AND CONCLUSIONS

- 7.1 The proposed development seeks planning permission for a *'Proposed Mixed Unit Holiday Accommodation Scheme, at Wild Rose Cottage, St Nicholas'*.
- 7.2 The proposals are considered to be policy compliant and both appropriate and acceptable. It is considered that there are several material considerations in support of the application, which include the following:
- The site is located within a sustainable location in direct proximity to bus stops, walking routes and the variety of services and facilities accessible within the settlement of St Nicholas and Culverhouse Cross;
 - The site seeks to make use of redundant buildings (without creating a need for replacement buildings and through the medium of minor construction works) in line with the aspirations of the LDP;
 - The principle of the development at the site is overwhelmingly supported by National Planning policies including PPW 11 and Future Wales: The National Plan 2040, which both acknowledge that tourism-related development is an essential element in rural areas;
 - The use of the site as a small-scale tourism development will support the rural economy and local tourism;
 - The design, siting and scale of the proposals will be aesthetically appealing which will complement the existing buildings at Wild Rose Cottage;
 - The proposed siting and scale of the proposal would not lead to an unacceptable impact on the character of the area, or upon the residential amenity of the surrounding buildings but will, instead, enhance the visual merit of the site and surrounding context;
 - The development provides a high-quality design which is sensitive to the site's rural setting and landscape, whilst retaining all the existing boundary hedgerows and trees;
 - The proposal benefits from an existing established access point which will be improved as part of the development, and the site provides sufficient capacity to accommodate the parking needs of the development;
 - The proposals would not lead to a detrimental impact in terms of access and highways, drainage, ecology or visual terms; and
 - The proposals provide the opportunity to contribute to, and enhance, the all-year-round tourism offering within the Vale of Glamorgan.
- 7.3 Accordingly, it is therefore considered that the proposed development, which seeks for a *'Proposed Mixed Unit Holiday Accommodation Scheme, at Wild Rose Cottage, St Nicholas'* is acceptable and we would respectfully request that the application be approved.

