

JMS PLANNING & DEVELOPMENT

PLANNING STATEMENT IN SUPPORT OF
AN APPLICATION

BY
MORGANS HOTEL

FOR THE CHANGE OF USE OF HOLIDAY
UNITS TO DWELLINGS

AT

PARC TEIFI
PONTRHYDFENDIGAID
YSTRAD MEURIG
CEREDIGION
SY25 6BH

Project: Parc Teifi, Pontrhydfendigaid, Ystrad Meurig, Ceredigion
Client: MORGANS HOTEL
Date: June 2024

DRAFT

JMS Planning & Development Ltd

T: 07395 285 056

E: gwennan@jmsplanning.com

© The contents of this document must not be copied or reproduced in whole or in part without the written consent of JMS Planning & Development Ltd

CONTENTS

SECTION 1:	INTRODUCTION	1
SECTION 2:	SITE AND SURROUNDING AREA	2
SECTION 3:	PLANNING HISTORY	4
SECTION 5:	PLANNING POLICY	7
SECTION 6:	PLANNING ISSUES	14
SECTION 7:	CONCLUSIONS	21

SECTION 1: INTRODUCTION

- 1.1 This Planning Statement has been prepared on behalf of Morgans Hotel and is submitted in support of an application for the change of use of the holiday cottages and managers dwelling to 15 residential units (C3 use class) at Parc Teifi, Pontrhydfendigaid.

- 1.2 This Planning Report should be read alongside the application drawings which have been submitted and accompanying reports. This Planning Report sets out a description of the application proposal, an overview of relevant planning policy and consideration of the relevant planning issues. Accordingly, Section 2 provides an overview of the site and surrounding area, Section 3 provides an overview of the planning history. Details of the application proposal are set at Section 4, whilst an overview of pertinent planning policy is provided at Section 5. The relevant planning issues are set out at Section 6 and the conclusions provided at Section 7.

SECTION 2: SITE AND SURROUNDING AREA

- 2.1 The application site – Parc Teifi is located within the Rural Service Centre of Pontrhydfendigaid behind the Red Lion pub, in the heart of the village. Its current lawful use is a holiday accommodation park with a total of 10 units, each resembling a dwelling from the outside and internally all provide the accommodation for day to day living. In addition there is a detached building which houses the laundry room and staff accommodation above and a further substantial detached building which includes a reception/bar area on the ground floor and 2 flats on the first floor. The site is accessed off the B4343 (Bridge Street) to the east.
- 2.2 The settlement of Pontrhydfendigaid is located to the west of the Cambrian Mountains between the service centres of Devil’s Bridge and Tregaron along the River Teifi. The village has a primary school, multi-purpose Pavilion, village hall, park, two public houses and a shop. It therefore provides a comprehensive range of services.
- 2.3 The village also has good public transport links and school bus provision to the secondary schools in the vicinity, including Tregaron, Penwedding and Penglais.
- 2.4 As per the Flood Risk Map from Natural Resources Wales, the application site falls within Flood Zone C2 and Flood Zone 3 under the Flood Map for Planning which is at more than 1% (1 in 100) chance of flooding from rivers and sea, including the effects of climate change. The proposal will not result in any increase floor area to that of the existing buildings and even though a dwelling is classified as a highly vulnerable use the people living at the properties will be more aware of the dangers of flooding and the evacuation procedure in the event of a flood than people who would use the place as a holiday accommodation for a short period of time.



Google: Aerial View of application site in Pontrhydfendigaid

DRAFT

SECTION 3: PLANNING HISTORY

- 3.1 A planning history search has been undertaken for the site using Ceredigion County Council's online planning portal.
- 3.2 There are several pieces of planning history relating to the site which are outlined in the table below. It is believed that planning permission reference A040498 relates to the site as it currently stands but with adaptations being made over time under various other applications.

Application No.	Proposal	Decision
931138	Renewal of permission for 10 caravans	Approved STC 18/11/1993
A040498	Replacement of 10no holiday caravans with 10no holiday chalets, erection of a shed and conversion of redundant building into site administrators office and accommodation	Approved STC 20/7/2005
A070679	Removal of Condition 10 of planning application A040498 to allow uPVC windows	Approved STC 9/9/2007
A070680	Alteration to Conditions 24 & 25 of planning application A040498 to enlarge units 2, 4 & 5	Approved STC 5/9/2007
A090403	Extension to provide toilet accommodation and storage	Approved STC 19/1/2010
A110376	Retrospective permission to retain reception office, bar and catering facilities on ground floor	Approved STC 17/11/2011

SECTION 4: THE PROPOSAL

- 4.1 The proposal seeks to change the use of the 5 pairs of semi detached holiday units into 5 pairs of semi-detached dwellings. The properties will comprise of a mix of two and three bedrooms with bathrooms, en-suites, open plan kitchen and lounge area, separate driveways to the front with parking and decking area to the rear which back onto private garden areas for each property. In addition there will be 5 x 1 bedroom flats all of which are proposed as affordable units. In total the proposal seeks consent for 15 units which are a mix of flats and dwellings. A communal amenity space is also proposed in the corner of the site which backs onto open countryside which amounts to 180 sq m of natural amenity area.
- 4.2 Externally, each property will remain as existing, but with their gardens being defined by fences and with allocated parking spaces for each property to the front. Additional screening will be implemented along the site boundaries and within gardens to aid the visual attractiveness of the site and enhance biodiversity.
- 4.3 By looking at the visual appearance of the units there will be no change and they will be used as permanent residential dwellings therefore instilling a sense of pride and community. It then means that the residents of the dwellings will be able to take their children to the local school and support the local economy and businesses.



Drone View of Parc Teifi

DRAFT

SECTION 5: PLANNING POLICY

5.1 This Section sets out an overview of national planning policy and Development Plan policy relevant to the proposal. The development plans for Ceredigion consists the Ceredigion Local Development Plan (LDP), no Strategic Development Plan (SDP) has been adopted for Mid Wales to date.

National Planning Policy

Future Wales – The National Plan 2040

5.2 Policy 2 of Future Wales sets out a series of strategic placemaking principles to shape growth and regeneration in urban areas. Said placemaking principles are:

- Creating a rich mix of uses
- Providing a variety of housing types and tenures
- Building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other
- Increasing population density, with development built at urban densities that can support public transport and local facilities
- Establishing a permeable network of streets, with a hierarchy that informs the nature of development
- Promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders
- Integrating green infrastructure, informed by the planning authority's Green Infrastructure Assessment

5.3 Whilst this policy is primarily focused on shaping growth and regeneration within National and Regional Growth Areas, the principles are also applicable to smaller settlements and should be applied to reflect the local context.

- 5.4 Future Wales notes that thriving, resilient and sustainable rural settlements are characterised by a rich mix of housing, employment, services and infrastructure located in the right places to meet the needs and future aspirations of the population. Moreover, PPW sets out that a broad balance between housing, community facilities, services and employment opportunities in both urban and rural areas should be promoted to minimise the need for long distance commuting. In accordance with the supporting text of Policy 4 of Future Wales, different uses should be situated in close proximity to each other, reflecting the strategic placemaking principles, to help create vibrant active places where people can walk and cycle and are less reliant on cars.
- 5.5 It could be argued that the principles of Future Wales do not easily fit into the nature of the built form in Ceredigion as it is a rural County with a heavy reliance on car as there is minimal public transport provision. However, this proposed development is within the Rural Service Centre of Pontrhydfendigaid provides facilities and services such as a shop, school, employment opportunities and play area, within walking distance of the site.
- 5.6 The settlement is also served by frequent bus services which link to Aberystwyth and Tregaron.
- 5.7 There are a mix of uses located within close proximity of each other in Pontrhydfendigaid, and although in a rural location it is viewed that the strategic placemaking principles are reflected and this is a fairly sustainable location with excellent green infrastructure within the vicinity as envisaged by Future Wales.
- 5.8 Policy 9 of Future Wales sets out requirements in relation to ecological networks and green infrastructure. Action towards securing the maintenance and enhancement of biodiversity to provide a net benefit, the resilience of ecosystems, and green infrastructure assets must be demonstrated as part of the development proposal through innovative,

nature-based approaches to site planning and the design of the built environment.

- 5.9 In line with Future Wales, development must be directed towards sustainable locations and designed to make it possible for people to make sustainable and healthy travel choices for their daily journeys. As highlighted, the proposal is a change of use of a non-viable business of holiday units into residential dwellings, therefore providing an economic boost to the facilities and services of Pontrhydfendigaid.
- 5.10 The applicant is fully aware that to meet the requirements of Policy 12 that active travel must be an essential and integral component of all new development. This is not a new development as such and is based within a designated Rural Service Centre where housing has been allocated under the LDP. New developments should be integrated with active travel networks and, where appropriate, contribute towards their expansion and improvement.
- 5.11 Alternative ways of dealing with cars that encourage a reduction in car use and an increase in active travel and use of public transport is promoted. The car journeys to and from the site is not expected to be any greater than the existing use as people will not be travelling to the destination for their holiday but rather living here, potentially working from home also. Car parking spaces have been located and designed in a manner which enables their conversion to other uses over time. In this scheme car parking has been kept to a minimum, with everything within close proximity to the site there is ample walking opportunities with no need to rely on private modes of transport.
- 5.12 In line with the Planning and Compulsory Purchase Act 2004, should a policy in Future Wales conflict with a policy in the Ceredigion LDP, then the conflict should be resolved in favour of the policy contained within Future Wales. This is due to Future Wales being the latest document to become part of the development plan.

Planning Policy Wales (Edition 12) (2024)

- 5.13 Planning Policy Wales Edition 12 published in February 2024 sets out the vision for Wales as set out in the Well-Being of Future Generations Act; a more prosperous Wales; a resilient Wales which supports healthy, functioning ecosystems and recognises the limits of the global environment; a healthier Wales; a more equal Wales; a Wales of more cohesive communities; a Wales of vibrant culture, and a globally responsible Wales. The document embeds the spirit of the Act by moving towards a low carbon, resilient society, of providing secure and well paid jobs and of building well connected environments for everyone in Wales that improves lives, health and enhances well-being.
- 5.14 Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government and is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars and policy clarification letters which together with the PPW provide the National Planning Policy Framework for Wales (paragraph 1.1).
- 5.15 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 culture wellbeing of Wales as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation. A well-functioning planning system is fundamental for sustainable development and achieving sustainable places (paragraph 1.2).
- 5.16 The PPW promotes action at all levels of the planning process, which is conducive to maximising its contribution to the well being of Wales and its communities. It encourages a wider, sustainable and problem solving outlook which focuses on integrating and addressing multiple issues rather than on an approach which is fragmented, un-coordinated and deals with issues in isolation (paragraph 1.3).

5.17 In response to the challenges laid down by the Global Biodiversity Framework agreed at COP15, a series of changes were made to Chapter 6, which came into effect on 11th October 2023. The main changes to policy can be summarised as follows:

Green Infrastructure: stronger emphasis on taking a proactive approach to green infrastructure covering cross boundary considerations, identifying key outputs of green infrastructure assessments, the submission of proportionate green infrastructure statements with planning applications and signposting Building with Nature standards.

Net Benefit for Biodiversity and the Step-wise Approach: further clarity is provided on securing net benefit for biodiversity through the application of the step-wise approach, including the acknowledgement of off-site compensation measures as a last resort, and, the need to consider enhancement and long-term management at each step. The use of the green infrastructure statement as a means of demonstrating the stepwise approach is made explicit. The importance of strategic collaboration to identify and capture larger scale opportunities for securing a net benefit for biodiversity is recognised.

Protection for Sites of Special Scientific Interest: strengthened approach to the protection of SSSIs, with increased clarity on the position for site management and exemptions for minor development necessary to maintain a 'living landscape'. Other development is considered unacceptable as a matter of principle. Exceptionally, a planned approach may be appropriate where necessary safeguards can be secured through a development plan.

Trees and Woodlands: closer alignment with the stepwise approach, along with promoting new planting as part of development based on securing the right tree in the right place.

Technical Advice Notes (TAN)

- 5.18 The Technical Advice Notes (TANs) provide guidance on a range of specific topics. The pertinent TANs in relation to the application site are:
- TAN5 – Nature Conservation and Planning
 - TAN11 – Noise
 - TAN12 – Design
 - TAN 15 – Development and Flood Risk
 - TAN18 – Transport
 - TAN20 – The Welsh Language
 - TAN23 – Economic Development

Local Planning Policy

- 5.19 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires Local Planning Authorities to determine planning applications in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.20 The Development Plan comprises of Ceredigion Local Development Plan 2007-2022 and accompanying Supplementary Planning Guidance's.
- 5.21 Policy SO1 – Sustainable Growth states that in terms of employment opportunities to provide for 4000 jobs across the County in a sustainable manner and there is the option of looking at sites that have not been allocated.
- 5.22 The application site falls within the settlement boundary for Ponrhydfendigaid Rural Service Centre Settlement Boundary, for the purposes of this application, the proposal is considered against Policy SO3 (Development in Rural Service Centres). The policy acknowledges the more rural context of RSCs over USCs, and thus opportunity is additionally provided for development types other than general housing to also come forward beyond the boundary if suitable locations are not available within the boundary. All housing development should come in

within the settlement boundary and are supported on both allocated sites and windfall sites, this site would be classified as a windfall site and a brownfield site. In terms of the latest LDP figures, even though the plan is time expired, there is a remaining allocation of 57 units within the service centre.

- 5.23 Policy DM06 relates to high quality design and Policy DM17 relates to the General Landscape. In terms of both of these policies there will be no material change to the appearance of the existing properties and as such there will be no additional impact on the landscape.
- 5.24 This scheme is considered to produce a negligible impact on the landscape. The current site benefits from effective screening due to its abundant boundary vegetation, which will be maintained and even enhanced. Consequently, there will be no discernible impact when observed from outside the site.
- 5.25 Regarding public rights of way (PROW), there are no public rights of way affecting the site, however there are numerous footpaths within the vicinity which lead out from the village. These pathways will remain unaffected by the proposal.
- 5.26 Policy LU16 seeks to resist the change of use from holiday accommodation to other uses unless it can be demonstrated that its unviable or there is no demand for the accommodation.

SECTION 6: PLANNING ISSUES

6.1 This Section of the supporting Planning Statement sets out an overview of the general planning issues which are considered relevant in the consideration and determination of this application. Accordingly, the following general planning matters are considered below:

- Loss of Holiday Accommodation;
- The principle of the development;
- Affordable Housing
- Flooding;
- Visual Impact;
- Amenity; and
- Highway safety and parking.

Loss of holiday accommodation

6.2 The applicant is aware that Policy LU16 stipulates that the LDP will “resist the change of use of establishments where possible unless it can be demonstrated that:

- i. Potential or continued use of the facility is unviable; or
- ii. There is no demand for this type of accommodation; or
- iii. Demand is adequately met by other providers in the Settlement Group.”

The type of accommodation at Parc Teifi is self-contained holiday units which does not fall into the category of being a ‘hotel, guest house, bed and breakfast or hostel’ which are specifically stated within Policy LU16.

6.3 Local Development Plan (LDP) Policy LU16 of the LDP resists the change of use of establishments where possible unless it can be demonstrated that the proposed development complies with criterion 3 of Policy LU14 which reads as follows:

- i potential or continued use of the facility is unviable; or*
- ii there is no demand for this type of accommodation; or*
- iii demand is adequately met by other providers in the Settlement Group*

- 6.4 The supplementary evidence submitted with this application demonstrate that running Parc Teifi as a sole holiday complex is not financially viable. During the past 4 years there has only been one instance where all 10 holiday units were full and that was due to a block booking by a company who attended the National Eisteddfod in Tregaron in August 2022 –a one off event in the area. The site and village lacks facilities for large accommodation such as this, with lack of night time economy, it is usually the case that larger parties focus their search for accommodation towards the larger towns and cities or on holiday camps such as Bluestone or Centreparcs.
- 6.5 The evidence demonstrates that Parc Teifi is widely advertised, nevertheless the bookings and income does not forefill the demand for any of the units. Even though the company which owns and runs Parc Teifi are well established in the tourism industry and know their best marketing tools and approach, nothing has worked on this site and it has failed over the years to become a successful business. Year upon year there are less bookings and higher costs involved in the running of the units.
- 6.6 The supporting evidence accompanying this papplication demonstrates that all reasonable attempts have been made to secure the continued operation of the existing provision with wide coverage and advertising.
- 6.7 Whilst in the present economic climate retaining 1 of the 10 as holiday accommodation may prove to be viable, there is no requirement at Parc Teifi for these types of self-catering holiday accommodation. The area has limited facilities to cater for larger parties, and is in a remote location. They are similar in style and size to the types of units available in Bluestone, but the difference is that Bluestone has extensive on site facilities. Unfortunatley, people no longer look for holiday units of this type unless they are large families or more than one family or a group of friends – and in such instances they want to be close to facilites and amenities.

- 6.8 The complex is unviable and running at a loss year upon year due to the cost of maintenance, cleaning, laundry, electric, water, tax, changing of the hot tubs and provision of an on site caretaker. The income is not covering these costs as the accounts which supplement this application demonstrate.
- 6.9 In 2022 the complex received a total of 51 bookings, that's 5.1 booking per cottage and in 2023/2024 financial year they have received 38 bookings that's only 3.8 bookings per cottage.
- 6.10 In the last three years the business has been running at an extensive loss as costs outweigh the total income. Occupancy was at its highest in 2022 out of the last three years at only 27% occupancy rate. In 2022 the number of nights sold was 854 which justified retain two of the cottages for holiday purposes (due to the Eisteddfod in Tregaron). However in the past two years there has been a decline year upon year making running any of the holiday cottages on site and retaining the laundry room and reception/bar unviable. It is therefore deemed that the figures speak for themselves and demonstrate that under Policy LU16 the loss of the holiday cottages can be justified as being unviable and no demand at this location.

Residential Use

- 6.11 The client is seeking an alternative use. The properties are all set up as dwellings as they are self-contained, have their own parking and garden area and can therefore be easily used as dwellings to meet the shortfall of housing delivery in this service centre and provide a portion of affordable housing. The only change would be their use class from holiday accommodation to C3 (dwelling-house). A change from a C6 (Dwelling used as short term let fewer than 31 days at a time) to C3 (dwelling-house) can be done under permitted development rights.
- 6.12 Pontrhydfendigaid is a service centre (as defined by the LDP) with two housing allocation sites however neither have been bought forward

during the lifetime of the Local Development Plan. Between 2007 and 2022 out of the requirement for 73 dwellings in the village, 10 have been completed and there are 6 outstanding consents leaving a remaining requirement of 57 dwellings.

6.13 The proposed mix of housing in line with Policy LU02 is defined in the table below and is in accordance with the Policy which states that “a mix of dwelling types and sizes to help secure a balanced housing stock, in that local area.”

Property Number	Style	Bedrooms
1	House (For Sale)	3 Bedrooms
2	House (For Sale)	3 Bedrooms
3	House (For Sale)	2 Bedrooms
4	House (For Sale)	2 Bedrooms
5	House (For Sale)	3 Bedrooms
6	House (For Sale)	3 Bedrooms
7	House (For Sale)	2 Bedrooms
8	House (For Sale)	2 Bedrooms
9	House (For Sale)	2 Bedrooms
10	House (For Sale)	2 Bedrooms
11	Flat (Affordable)	1 Bedrooms
12	Flat (Affordable)	1 Bedrooms
13	Flat (Affordable)	1 Bedrooms
14	Flat (Affordable)	1 Bedrooms
15	Flat (Affordable)	1 Bedrooms

6.14 The proposal to therefore provide additional housing against Policy S01 and S03 of the LDP is deemed to be acceptable.

Affordable Housing

6.15 The client is willing to provide 20% affordable dwelling in line with Policy S05, the 5 x 1 bedroom flats are all proposed as affordable units which

amounts to 33.3% of the development being affordable. Their current open market value is xxx and they would be discounted by 30% of the open market value and therefore could be sold for £xxxxxx meeting the County wide demand for affordable housing.

Flood Risk

6.16 The application proposal is located within flood zone 3 as defined by the FMfP and within Flood Zone C2. Contact has been made early on with NRW who have confirmed that as the use of the site is not changing in that the existing and proposed use are highly vulnerable development (and that there is no differentiation between a dwelling and holiday accommodation) and as the site has not flooded in the lifetime of the development that they deem that there no requirement for a Flood Consequence Assessment.

6.17 A pre-app was submitted to NRW and a response was received on the 14th February 2024 stating that:

“We understand the existing development is considered highly vulnerable and the proposal does not result in a change in vulnerability. TAN15 does not differentiate on intensification of use, only on the vulnerability designation use of the development. We would recommend a Flood Consequence Assessment (FCA) is submitted for the development should this proceed to a formal planning application. **However, this is not a requirement for this proposal as no additional buildings are proposed and there is no change in development vulnerability.**”

6.18 Whilst there is a recommendation for an FCA, one is not required in line with TAN 15 as the vulnerability and number of buildings are not increasing, therefore there is no adverse risk in terms of flooding to the properties or within the catchment. The application is therefore not accompanied by an FCA as there is no merit in an assessment being

undertaken at a financial cost to the client which would not advise the Local Authority any differently from what is already known.

Visual Impact

- 6.19 In terms of Policy DMO6 and DM17 of the LDP there will be no change in terms of the design of Parc Teifi or in its appearance as the properties are already in situ and no amendments are proposed to their designs. The only change will be in the addition of car parking to each property.

Amenity

- 6.20 The proposed scheme entails the change from holiday accommodation to residential dwellings therefore there will be a sense of ownership for the dwellings rather than groups of people coming and going. This will potentially result in less noise and large gatherings as it is unlikely that every dwelling will be used to full capacity.
- 6.21 Overall, there will be no unacceptable impact on amenity. As such, it is considered that the development is fully compliant with Policy DMO6 – High Quality Design and Placemaking.
- 6.22 Public open space is also included in line with Policy LU24 which will be accessed between dwelling 10 and the laundry room and provided under the trees and opening out onto the countryside to the rear.

Highway Safety and Parking

- 6.23 The application is accompanied by a Transport Assessment which provides the details for the access, egress and parking provision within the site. The assessment concludes that it is not possible to accommodate an adoptable standard estate road due to the constraints of the site. However a 5.5m carriageway, a turning head which can cater for a refuse vehicle and a 2.0m pavement on one side of the carriageway can be accommodated. The visibility out on the main road is also achievable.

6.24 As such, the proposal is in line with adopted Policies DMO6 and TAN 18.

DRAFT

SECTION 7: CONCLUSIONS

- 7.1 The submitted application seeks full planning permission for the change of use of 10 properties from holiday accommodation to open market dwellings and the retention of 3 flats to become affordables with the proposed addition of 2 affordable flats instead of the reception/bar area.
- 7.2 The proposed development aligns with Policies S01, S03 and S05 of the Local Development Plan in that it provides much needed housing within a Rural Service Centre which has not delivered its allocation and which has seen limited growth (which aids to sustain the economy) over the past 20 years.
- 7.3 The application has been submitted in good faith following a positive pre-application response which concluded by stating that “The principle of a residential development in this location is considered acceptable.”
- 7.4 The proposal will generate much needed open market and affordable housing where it has been demonstrated that the accommodation for holiday purposes has been unviable.
- 7.5 Based on the above it is requested that planning permission is forthcoming for this proposal.