

Low Impact Tourism Accommodation – SPG responses

Respondent	Comment	Recommended Response	Officer Recommended Change
NRW	<p>Since the development of non-permanent holiday accommodation can involve the conversion of existing buildings, which may impact on protected species, we advocate that Policy 46 makes appropriate cross-reference to the need to consider protected species where such developments involve building conversions. The guidance should cross-reference to the relevant biodiversity policies and guidance.</p>	<p>Comments are noted however NRW are advised that these policies form part of the adopted LDP. Any changes to these policies can only be enacted through formal review. NRW's comments are therefore outside of the remit of this consultation.</p> <p>We hope that these issues can be addressed by NRW at the appropriate time at LDP review.</p> <p>This document is intended to provide guidance on the implementation of a single policy.</p> <p>As the need to consult all relevant LDP policy is not clear an additional statement should be added to the plan to remind applicants that the guidance note only relates to policy 46</p>	<p>The following statement added to the end of para 1.6</p> <p><b>Applicants are reminded that this document is not exhaustive and they are advised to consult all relevant policies within the Local Development Plan in designing their scheme.</b></p>
NRW	<p>We also recommend the following additions/amendments:</p> <ul style="list-style-type: none"> <li>i. Reference to the Management Plan, and specifically how farm diversification may impact on the Special Qualities - these could be set out in an annex.</li> </ul>	<p>Whereas we understand the purpose of this suggested change, it may be more appropriate to provide readers with a link to the Landscape and Development SPG which specifically considers potential impacts of development on the special qualities of the National Park..</p> <p>In relation to the need to reference the NPMP. This is considered unnecessary in this context. This is because the Local Development plan is the land based expression of the strategic direction of the National Park Management Plan, as such policy of the LDP is drafted to aid implementation of the Strategic Objectives of the NPMP (where this is possible) and protect the Special Qualities as defined by the NPMP.</p>	<p>Additional para added to Applicants are advised to consult the NPAs 'Landscape and Development Supplementary Planning Guidance' (BBNPA October 24<sup>th</sup> 2014, for guidance on developing a scheme appropriate to its landscape setting. <a href="http://www.beacons-npa.gov.uk/wp-content/uploads/Landscape-and-Development-SPG-Adopted-October-2014.pdf">http://www.beacons-npa.gov.uk/wp-content/uploads/Landscape-and-Development-SPG-Adopted-October-2014.pdf</a></p>

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		<p>As such the objectives of the NPMP are considered to be adequately addressed through Policy 46.</p> <p>I also note that this relates specifically to farm diversification, it may be that such schemes will be presented outside of defined agricultural holdings.</p>	
NRW	<p>ii. Measures in section 5 (Planning Conditions) to minimise night lighting to support the International Dark Skies designation of the BBNP.</p>	<p>Comments noted, this will provide clarity to applicants as to the level of controls that will be necessary for such development.</p>	<p>Additional section (v) added to 5.2 to state. Measures to minimize impact of lighting to support the International Dark Skies designation.</p>
NRW	<p>iii. A mention of the fact that Glastir also makes provision for the restoration of Traditional Farm Buildings and additional expertise and advice may be available via this scheme.</p>	<p>The potential benefit of this may be limited due to the fact that not all such schemes will form part of a farm diversification scheme. However further information is requested from NRW and we would happily amend to include if this information were to be forthcoming</p>	<p>Amend if necessary</p>
NRW	<p>iv. Inclusion of a low energy requirement (in addition to renewable source of energy) into paragraph 3.2. Additionally, we recommend addition of <b>'and design'</b> (3rd bullet point) and <b>'and landscape'</b> (5th bullet point).</p> <p>v. Paragraph 3.8 – omit 'should be included within formalised landscape schemes and' and replace with <b>'fire pits, barbeque areas and other incidental features should be integrated within the overall scheme design'</b></p>	<p>In the interest of clarity, amendment should be made as per respondents recommendation</p>	<p>Para 3.2 i. addition of <b>'and design'</b> (3rd bullet point) and <b>'and landscape'</b> (5th bullet point).</p> <p>3.8 i. fire pits, barbeque areas and other incidental features should be <b>integrated within the overall scheme design'</b></p>

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NRW	<p>Paragraph 3.3 requires clarification. Many LITA proposals will have a requirement for electricity, water and drainage, and where permanent solutions (such as drainage into the main sewer network) are available, they may present the best option.</p> <p>We recommend the following amendments (in bold):</p> <p>‘LITA proposals should <b>ensure appropriate initial design and, where appropriate and feasible,</b> incorporate more sustainable infrastructure solutions, such as sustainable urban drainage <b>and small-scale renewable energy</b> <del>rather than requiring permanent supplies of electricity, water and drainage</del>. Solutions, which are capable of integrating within the landscape without the means of seasonal solutions such as <b>soft</b> landscaping, will be encouraged. <b>Planting schemes can, however, help to integrate LITA developments into the landscape, provided the planting is in keeping with the local character.</b>’</p>	<p>The purpose of this paragraph is to set out that such schemes should be ‘low impact’ in terms of the hard infrastructure that is needed to support them. However it is acknowledged that the statements within para 3.3 are not clear, and as such the paragraph should be omitted to avoid any future confusion.</p>	Delete para 3.3
NRW	<p>Paragraph 3.7 states: ‘<i>In areas recognised for their landscape, townscape or historic value, it will be most appropriate to seek to reinforce traditional and local distinctiveness appropriate</i></p>		<p>Amend para 3.7 to state <del><i>In areas recognised for their landscape, townscape or historic value, it will be most</i></del></p>

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	<p>to the location.’ We note that the whole National Park is recognised for its landscape value, and therefore would expect local distinctiveness to be encouraged throughout the BBNP</p>		<p><del>appropriate to seek to reinforce traditional and local distinctiveness appropriate to the location.</del> . <b>In designing these elements within a LITA scheme applicants will be expected to seek to reinforce traditional and local distinctiveness appropriate to the location</b></p>
The Coal Authority	<p>Having reviewed the document, I confirm that we have no specific comments to make at this stage.</p>	Comments noted	No change necessary
CLA	<p>We note from para 7.8 of the LDP that “The National Park Authorities Sustainable Tourism Strategy identifies that tourism is one of the foremost means of achieving fostering the social and economic wellbeing of the local communities”. We also note the principle of LDP policy SP14 – Sustainable Tourism which indicates an enabling attitude towards sustainable development. Despite these positive overtures there seem to be contradictory statements between the content of LDP para7.8.5.1 and Policy 46. Fundamentally we question the purpose of the SPG, if it is as suggested at para 1.6 to provide, “broad guidance which will assist all those involved in the formulation and determination of such proposals” then we suggest the document fails to deliver. The document as published is a re-iteration of why the park exists, its purposes and the policies it will pursue to maintain those purposes. It does not provide practical guidance to potential applicants on how to develop a concept that may be acceptable within the NPA. The guidance at 3.2 is inconclusive and it is unclear whether all LITA proposals need to demonstrate consideration of some or all of the elements listed.</p>	<p>The draft SPG is intended as a broad guide to provide some further information as to the level of detail that would be required from such proposals. Development in the open countryside is strictly controlled (in accordance with Planning Policy Wales) and all exceptions to this must be properly evidenced in terms of their need and the function they will fulfil. The level of detail is provided as a starting point for applicants, for the sorts of things they will need to consider in designing such a scheme at the outset. Each scheme will be individual depending on the location and scale of the proposal and as such each application will need to be judged on its merits. We will happily do this through the pre-application service.</p> <p>It is agreed that the statement at 3.2 is not clear, and should be amended to provide additional clarity.</p>	<p>Amend para 3.2 to state:  <b>The main features of Low Impact Development are:</b></p> <ul style="list-style-type: none"> <li>• <b>locally adapted, diverse and unique;</b></li> <li>• <b>based on renewable resources;</b></li> <li>• <b>of an appropriate scale and design;</b></li> <li>• <b>visually unobtrusive;</b></li> <li>• <b>enhances biodiversity and landscape;</b></li> <li>• <b>increases public access to open space;</b></li> <li>• <b>generates little traffic;</b></li> <li>• <b>linked to sustainable livelihoods;</b></li> <li>• <b>co-ordinated by a management plan. (Maxey, L. Dr, 2009)</b></li> </ul> <p><b>All LITA</b></p>

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			<p><b>proposals will need to demonstrate that they incorporate all of the above elements into their scheme.</b></p>
CLA	<p>We seek clarification on the legislative authority (legitimacy) for the requirement at 5.2(iii) for an LITA operator to require keeping a register of the owners/operators of individual structures and their main home address.</p>	<p>The condition is often utilised in such tourism development schemes, it enables the NPA to ensure that there is no permanent occupation of structures on site. The term structure in this context refers to the yurt/shepherds hut etc.</p> <p>It is considered that such a condition would meet the tests in para 206 of the National Planning Framework (WG 06/2014)</p>	<p>No change necessary at this time</p>
Talgarth Town Council	<p>4.1 As part of any submission the Brecon Beacons National Park Authority would expect to be submitted a reasonable level of detail in order to allow a comprehensive consideration of the application details. Applicants are encouraged to engage with the Authority through the paid pre-application service which is offered by the Brecon Beacons National Park Authority. This will enable an assessment of the likely acceptability of a proposed development and a detailed list of all necessary documents to be submitted with any future application." Talgarth Town Council feels that this paragraph could imply to prospective developers that paying for pre-planning advice would be more likely to ensure that their application would be passed. It also implies that they will be party to a "detailed list " that they would not otherwise have. Whilst we realise that this is, in most likely hood, not the intention perhaps the paragraph</p>	<p>Comments noted. In the interest of clarity, paragraph should be reworded.</p>	<p>Amend para 4.1 to state: Due to the complex nature of the planning application process applicants are encouraged to engage with the Authority through the paid pre-application service. This service will enable the identification at an early stage of the need for additional information and/or specialist input and assist in preparing such a proposal for formal application submission.</p>

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	could be better phrased.		
Agents group	<p>The vision in Planning Policy Wales has the aspiration of broadening the seasons for tourism. As referred to at Paragraph 2.2, restricting tourism to certain months within any one calendar year will impact on community economic benefit. By imposing planning conditions on tourist proposals that prevent occupancy during certain months such as October – March prevents fostering of a healthy, diverse, local and national economy. The establishment of the winter festival in early December at Hay on Wye is an example of where ongoing tourism would be of value to the community. The SPG should be more supportive to the fluidity of tourism proposals that retain the quality of the designated landscape. The policy needs to allow for the expectation of a higher quality of tourism.</p>	<p>Whereas we acknowledge the importance of year round tourism, it is not considered that it will be appropriate to enable year round functioning of such schemes in open countryside. As stated in the LDP such conditions are used for two reasons</p> <p>(a) to limit landscape impacts at a time when such schemes will be unable to benefit from vegetation cover.</p> <p>(b) to ensure that important nature conservation interests can be safeguarded by the non-use of sites in the winter.</p> <p>These conditions enable the Authority to uphold its primary purpose. To extend the period of operation may well provide benefits to tourism and socio-economic identity, however at risk to our first purpose. The Sandford Principle asserts the primacy of our first purpose over the second in cases of irreconcilable conflict.</p> <p>As always the NPA will adopt a robust but flexible approach to application of this policy, if a genuine case can be made for operation outside of the acceptable period, and the applicant can demonstrate no adverse impact in keeping with our first purpose, the NPA can consider alternative operating restrictions to those stated in the LDP/Guidance.</p>	No change necessary at present time
Agents group	With reference to paragraph 3.1, many of these types of structures on bio-diverse sites could have an educational use. Therefore by restricting tourism uses	Please see comments above	No change necessary at present time

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	to particular 'warmer months' could undermine the opportunity for school pupils becoming more aware of the need for sustainability. Retention of certain structures could act as an impromptu classroom and provide shelter from the elements.		
Agents group	If the notion at paragraph 3.1 refers to structures being removed on a seasonal basis, this may be difficult to establish for certain structures such as lodges or tree houses. It is impractical for such structures to be dismantled at the end of one season only to be recreated in the next. The material and building techniques do not lend themselves to such practice although it is agreed that permanent removal would not scar the landscape. It is considered preferable to allow such structures to remain vacant in certain months although as mentioned above, there is scope for a more extensive economic use benefitting communities.	The need to remove the structures outside of the season will be judged on a case by case basis. However, as stated in the LDP there is a presumption against the development of new permanent holiday accommodation in the open countryside. As such the expected position would be that the majority of the non-permanent holiday accommodation would be removed from site outside of operational months.	No change necessary at present time
Agents group	Suggest there is a definition of Tree house included in the Appendix	Comments noted, this would aid interpretation of this policy	Glossary amended <b>Tree house</b> – A structure built around, next or among the trunk and branches of a tree above ground level. For such structures to be considered Low Impact Development in accordance with Policy 46 they would need to be more temporary in nature than some forms of permanently occupied Tree- Houses.

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Agents group	Regarding paragraph 3.5, it is questioned why certain types of LITA schemes could not be used for permanent use. Although there may not be a high demand for such accommodation, there may be some demand and it is suggested that the Authority considers this as a potential option even advocating specific rural sites for such purposes. If Gypsy sites can have a particular designation, why not this type of accommodation?	<p>There is enabling National Policy for low impact development schemes to be developed outside of defined settlements. Please refer to One Planet Development section in PPW 9.3.11-2 and TAN 6 para 4.15</p> <p>These forms of development are similarly supported by LDP policy CYD LPI</p> <p>As yet we have not had demand for allocation of such sites, but would be open to suggestions at time of LDP review.</p>	No change necessary at present
Agents group	It is considered that the contents of paragraph 5.4 are contrary to the vision put forward at paragraph 11.1.7, Planning Policy Wales Edition 7. The Welsh Government does not consider tourism has a negative effect on businesses and jobs. This paragraph needs to be re-written.	<p>Comments noted,</p> <p>The sentiment of the paragraph is to demonstrate the need for occupancy restrictions to protect the environment without having an adverse impact on the local economy. Paragraph should be amended to provide clarity. 'Protecting' should be replaced with 'preventing'</p>	Seasonal occupancy conditions should maintain a healthy balance between protecting the environment and avoid exacerbating the seasonal nature of tourism within each individual area, thus <b>preventing</b> any negative effects on local businesses and jobs.



