

PLANNING STATEMENT

Elan Valley Visitor Centre Elan Village, Powys

September 2024



Summary

Proposal:

Full planning application for the proposed refurbishment and extension of the visitor centre with associated works including parking and landscaping.

Location:

Elan Valley Visitor Centre, Rhayader, Powys.

Date:

September 2024

Project Reference:

24.182

Client:

Dŵr Cymru Welsh Water (DCWW)

Product of:

Asbri Planning Limited
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Introduction

- 1.1 This Planning Statement has been prepared by Asbri Planning Ltd on behalf of Dŵr Cymru Welsh Water (DCWW) in relation to the proposed full planning application for the proposed refurbishment and extension of the visitor centre with associated works including parking and landscaping, at the Elan Valley Visitor Centre, near Rhayader, Powys.
- 1.2 The application site comprises the existing Elan Valley Visitor Centre, measuring 1.57 Ha in size. The site is located approximately 350m to the north-east of the Caban Coch Dam, which is located 4 miles to the south-west of Rhayader.
- 1.3 Elan Valley is an iconic visitor attraction with a unique heritage, surrounded by an epic landscape including spectacular dams and majestic lakes. It is a haven for wildlife and provides recreational opportunities to the public in the immediate area, regionally and beyond.
- 1.4 A major programme of development, the Elan Valley project (EVL), led by Dŵr Cymru Welsh Water Visitor Attractions, is securing funding from the Mid Wales Growth Deal (MWGD) for delivery over a 5 year infrastructure period (2024-2029).
- 1.5 The Growth Deal is set within the broader vision for growing Mid Wales and will play a key role alongside a range of other strategies and investments from the public and private sector to bring prosperity to the communities and businesses of the region.
- 1.6 The Elan Valley proposals are considered to contribute to the Mid Wales Growth Deal through delivering a flagship visitor destination, including; the upgrading of the existing facilities and infrastructure, providing new amenities, services and experiences for public enjoyment.
- 1.7 The planning application comprises the following set of drawings:

Drawing name	Prepared By
Site Location Plan	Ray Hole Architects
Landscape General Arrangement Site Plan	Arup
Existing Elevations 020 P1	Ray Hole Architects
Existing Floor Plans 005 P1	Ray Hole Architects
Proposed Elevations 300 P3	Ray Hole Architects
Proposed Ground Floor Plan 110 P3	Ray Hole Architects

Proposed First Floor Plan 111 P3	Ray Hole Architects
Proposed Roof Plan 112 P3	Ray Hole Architects
Foul Drainage Plan	Arup
Surface Water Drainage Plan	Arup

1.8 In addition, the following supporting documents are submitted.

Document	Prepared by
Planning application form (1APP)	Asbri Planning
Application Covering Letter	Asbri Planning
Planning Statement	Asbri Planning
Design and Access Statement	Asbri Planning
Drainage Strategy	Arup
Flood Consequences Assessment	Waterco
Geotechnical Desk Study & Contaminated Land Preliminary Risk Assessment	Arup
Green Infrastructure Statement	Arup
Heritage Assessment	EDP
Landscape and Visual Appraisal	EDP
Landscape Design and Access Statement	Arup
Tree Survey	Mackley Davies
Transport Statement	Arup
Preliminary Ecological Appraisal	Apem

1.9 This Planning Statement presents the planning case for the proposed development having regard to the site and its surroundings, the planning history, and policy context. It considers the key policy issues and planning merits of the proposed development. The statement is structured as follows:

- **Section 2:** provides a description of the site and its surroundings
- **Section 3:** includes a review of the site's planning history and a summary of the pre-application discussions
- **Section 4:** summarises the development proposals;
- **Section 5:** outlines the relevant planning policy context, at both the national and local level;
- **Section 6:** addresses the key planning considerations associated with the development proposal; and

- **Section 7:** provides a conclusion regarding the overall acceptability of the application.

Site Description

General location

- 2.1 The application site is located to the north east of Caban Coch Dam, and is located on grid coordinates: X: 292808, Y: 264625 in the centre of Powys.
- 2.2 The site's surrounding context is predominantly rural, with the nearest residential properties located to the north east of the site at Elan Village.

Site Description

- 2.3 The site comprises the existing Elan Valley visitor centre and its surroundings. The site measures 1.57 Ha in area. The Elan Valley visitor centre is a popular visitor attraction, surrounded by the lakes and dams which characterise the local landscape.
- 2.4 A review of Natural Resources Wales' Development Advice Map shows some of the site to sit within Flood Zone C2, with the visitor centre itself located within Flood Zone A.
- 2.5 Based on LiDAR data, the Afon Elan is approximately 20m south of the visitor centre however is approximately 4.5m lower than the visitor centre level (approx. 214.50mAOD). Therefore, as captured in the Flood and Coastal Erosion Risk Map extract fluvial flood risk is contained to within the riverbank and fluvial flood risk is low.
- 2.6 A review of Historic Wales' online mapping system highlights that the Visitor Centre is not a listed building but it is within the setting of a number of nearby listed structures, inclusive of the following:
- 'Caban Coch Dam (partly in Llanwrthwl community)'. Grade II* Listed, located approx. 350m to the west of the site (Cadw ref: 16202);
 - 'Caban Coch Dam (partly in Rhayader community)'. Grade II* Listed, located approx. 370m to the southwest of the site (Cadw ref: 24389);
 - 'Hydro-Electric Station below Caban Coch Dam (North Power House). Grade II Listed, located approx. 225m to the west of the site (Cadw ref: 16203);
 - 'Hydro-Electric Station below Caban Coch Dam (South Power House). Grade II Listed, located approx. 250m to the southwest of the site (Cadw ref: 16205);
 - 'Footbridge at Hydro-Electric Station (partly in Llanwrthwl community)'. Grade II Listed, located approx. 240m to the west of the site (Cadw ref: 16204);
 - 'Footbridge at Hydro-Electric station (partly in Rhayader community). Grade II Listed, located approx. 240m to the west of the site (Cadw ref: 24391);

- 'Cadan View'. Grade II Listed, located approx. 550m to the northeast of the site (Cadw ref: 16207);
- 'Estate Office including House to the Rear'. Grade II Listed, located approx. 550m to the northeast of the site (Cadw ref: 16208);
- 'Shelter and Fountain'. Grade II Listed, located approx. 650m to the northeast of the site (Cadw ref: 16209); and
- 'Elan Valley Lodge'. Grade II Listed, located approx. 750m to the northeast of the site (Cadw ref: 16206);

2.7 During pre-application discussions, the local planning authority considered that the building was curtilage listed, being within the curtilage of the Caban Coch Dam. EDP has assessed this within their Heritage Assessment and, in their opinion, the building is not considered to be curtilage listed. This is because it is not considered that it meets all three tests of physical layout, ownership, and use/function. This matter is set out in more detail in the Heritage Assessment that accompanies this planning application.

2.8 In addition, the River Elan SAC and SSSI is located immediately south of the application site and the site sits within the Elan Valley Historic Landscape.

2.9 The centre sits adjacent to National Cycle Route 81, a route of 113 miles linking Aberystwyth to Wolverhampton, and a number of Public Rights of Way surround the site with extensive routes shown to the north and south of the Elan River.

Planning Context

Planning History

3.1 A review of Powys County Council's online planning register indicates that the visitor centre site and its adjacent land is subject to the following planning history:

- Ref: R2805 – ‘Change of Use of disused workshop and erection of extension to form a visitor centre with associated car and coach parking’. Approved February 1984;
- Ref: PR2805/01 – ‘Erection of Extension’. Approved October 1996.
- Ref: P/2013/0643 ‘Full: Erection of 28 roof mounted solar photovoltaic panels’. Refused December 2013.
- Ref: P/2013/0644 – ‘LBC: Erection of 28 roof mounted solar photovoltaic panels’. Refused December 2013.
- Ref: P/2015/0139 – ‘Proposed extension to existing play area and associated fencing and erection of new storage shed’. Approved January 2016.
- Ref: 21/2185/FUL – ‘The proposed development of a bike hub and associated works’. Approved July 2022.
- Ref: 24/0680/FUL – ‘Siting of a storage container and associated fencing (retrospective)’. Awaiting decision.

3.2 The reason for the refusal of P/2013/0643 and P/2013/0644 relates to the impact of the proposals on the character and appearance of the existing visitor centre. In full, the reason for refusal states:

“The proposed development would be seen as having an unacceptable adverse impact on the character and appearance of the historic building specifically to the historic roofline and vents. It is therefore considered that the proposed development is therefore seen to be contrary to guidance contained within policy GP1, GP3 and E7 of the Unitary Development Plan and Planning Policy Wales (Edition 5, 2012).”

Pre-Application Enquiry with LPA

3.3 A pre-application enquiry was submitted to Powys County Council on behalf of the applicant on the 28th June 2024 to demonstrate that the existing visitor centre can be appropriately redeveloped in order to deliver a contemporary, high-quality visitor attraction, whilst reflecting the sensitive heritage and landscaping contexts of the local area.

3.4 Pre-application responses were provided by Powys County Council's Planning and Heritage departments, on the 1st and 3rd of August respectively. The key matters raised within the responses include the following:

Planning Response:

Officer Appraisal

"Advice has been sought in relation to the redevelopment of the Elan Valley Visitors Centre. The submission does not detail exactly what the proposed 'redevelopment' would consist of in total, though it is clear that the existing building would be extended, and that the existing children's play area may be relocated. Separate advice has also been sought in relation to this proposal from the Built Heritage Officer, who will respond separately. It has become apparent during the Teams meeting that the application exceeds the thresholds to be considered as a major development."

Principle of Development

"Policy TD1 provides a supportive stance to tourism development at existing and new sites. The Elan Valley is a very well-established tourist destination, featuring the existing visitors centre and various reservoirs and dams, together with public rights of ways.

The development is proposed as a way to enhance the experience of tourists, and to support the longevity of the centre's operation, which is supported by TD1.

The development incorporates staff offices alongside the visitors centre, and consideration should therefore also be given to Policy E2, which states that:

"Proposals for employment development on non-allocated sites will be permitted where it is demonstrated that no other suitable existing or allocated employment sites or previously developed land can reasonably accommodate the proposal, and where at least one of the following criteria is met:

- 1. The proposal is up to 0.5ha. and is located within or adjoining a settlement with a development boundary.*
- 2. The proposal is for the limited expansion, extension or environmental improvement of existing employment sites and buildings.*
- 3. The proposal is appropriate in scale and nature to its location and is supported by a business case which demonstrates that its location is justified."*

The staff facilities at the site are existing, however it is not entirely clear how the proposals will impact upon this provision in terms of scale of provision, as the existing floor plan labels are illegible. Information should accompany any future planning application giving details of the expansion, and how the proposal is considered to be 'limited', in accordance with criterion 2."

Design and Built Heritage Impact

"It is currently considered likely that the building is curtilage listed. If this is the case, the primary consideration for any future design will be ensuring that the design is fitting for the heritage asset. Should it be

determined through more detailed consideration that the building is not curtilage listed, given its sensitive location in proximity to several listed buildings, and the Elan Valley Conservation Area, built heritage will still be a key consideration.

As discussed in the Teams meeting of the 31st July, Sam Johnson (Built Heritage Officer) will therefore give advice in this regard."

Landscape

"The application site is defined by LANDMAP as "two areas forming sides of upland narrow Elan and Claerwen valleys with very steep, craggy slopes in places. Mix of seminatural rough vegetation, sparse woodland, forestry plantations and grazing fields with stone walls. These areas form an attractive backdrop to the lower Elan Valley Reservoirs and the village and thus are an important component of popular scenic route views."

The visitor's centre is located at the bottom of the valley, adjacent to the Elan River, with steep slopes either side to the North and South. Given the topography of the site, and the contours and curves of the hills, there are relatively limited views of the building. Nonetheless, what views there are, are sensitive. The building is visible on entrance to the Elan Valley, either when going directly to it, or when driving to the Caban Coch Reservoir, and can be readily seen from the north-eastern end of this reservoir. These locations are often the first and second stops on visitor's agendas, and can therefore have a big influence on the landscape impact of the area.

Section 6.8 of the adopted Landscape SPG states that all developments within the open countryside should be supported by a baseline landscape assessment, which is considered to be particularly important in this case, given the sensitivity of the site's location. Should this assessment determine that a wider / more in-depth assessment is required, then this should be undertaken and submitted with the application."

Ecology and Green Infrastructure

"Given the nature of the development, and the close proximity to a high number of ecological designations, a preliminary ecological appraisal (PEA) will be required as a minimum in support of any future planning application. NRW and PCC Ecology will be consulted on any planning application, and this information will be required to inform any HRA or Appropriate Assessment that may be required in relation to the potential impact on these sites. Should this PEA determine that any activity surveys are required, these must also be undertaken and submitted with the planning application from the outset."

Any future planning application would need to be supported by a Green Infrastructure Statement outlining how green infrastructure has been incorporated into the development. This statement should be proportionate to the scale and nature of the development being

proposed. The statement should confirm how the step-wise approach, detailed within Planning Policy Wales Edition 12 has been applied.

I would expect to see the existing block plan confirming the locations of all existing trees and hedgerows around the site, and proposed block plan showing the locations of all existing, and proposed (with each identifiable as existing or proposed). Trees and hedgerows should be retained as far as possible, but, in the event that trees are required to be felled, three replacement trees for each tree felled is required as compensation."

Public Rights of Way

"There are several public right of ways (ROW) within the vicinity of the site, with one (144/250/1) going through the site itself, to the North of the building. This has not been shown on the plans, and given that the proposed floor plans are not to scale, it is not possible for us to tell how far the building is to be extended upon this side.

Care will need to be taken to ensure that the extension does not encroach upon the ROW. If this is unavoidable, a legal diversion of the ROW will need to be in place. As I understand, this process can take a minimum of 6 months. Further guidance should be sought directly from the ROW team if a diversion is required."

Conclusion

"The enquiry contains little information about what is included in the redevelopment, besides the proposed extensions to the visitor's centre. These extensions are likely to be considered as acceptable in principle from a planning perspective, though the status of the building in respect of curtilage listing should be explored further prior to finalising designs. All other material considerations as outlined above will also need to be considered."

Heritage Officer Response:

Curtilage Listing

"The Visitor Centre itself is considered to meet the three tests of a curtilage listed structure.

- 1. Physical layout; The building sits before the Caban Coch dam and as a workshop served the dams as a whole. The site is vast and there are many ancillary structures which are related to the dams which are within this curtilage (railings, stone walls etc).*
- 2. Ownership, historic and current. Birmingham Corporation to Welsh Water.*
- 3. Use or function, historic and current. Ancillary to the main use of the listed dams, to serve them. This is initially as a workshop and latterly as a museum, café and gift shop."*

Conclusion

"The scheme is supported in principle; however, the design is not. It is considered the design would alienate the workshop from its architectural environs in terms of the Elan Valley dams, associated structures, and the Elan Village. The design covers all sides of the historic building and obscures key design features that are evocative of the Arts and Crafts Elan style.

Certain aspects of the proposal are not considered to be polite neighbours in terms of the contrast between them and the host building. Additions should respond and reflect to the existing building, and the scheme as it stands is not considered to achieve this. This is particularly apparent in the number of low-level conical and domed roofs, alongside many blank and curving walls.

Key design elements are supported in terms of a curved glazed viewing wall to the west, and a copper clad dome to the east, alongside an extension of the central block to two stories with a pitched roof.

The use of patinated copper, or copper that will patinate over time, for some roof elements is supported. The use of stone for walling is supported, but more detail is required.

The overall architectural style of any proposed addition need not be a repetition of the host building, it is considered that a modern addition is possible. However, this should respond to the Elan Valley Arts and Crafts style and themes, and stand apart from rather than in Rodin-esque union with, the existing building."

Pre-Application Consultation

- 3.5 In accordance with Part 1A of 'The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 ("the 2016 Order") all major developments (developments of a site area of 1.0 Ha or higher) are required to be subject of pre-application consultation, prior to the Planning Application being validated by the Local Planning Authority.
- 3.6 As the site area of the proposed development is 1.57 Ha, it is therefore over the major development threshold of 1.0 Ha. Accordingly, pre-application consultation is to be undertaken between 4th September 2024 until 2nd October 2024 for this planning application in accordance with 'The Order'.
- 3.7 The proposed application, along with copies of the proposed plans and reports, will be available for public viewing online at www.asbriplanning.co.uk/statutory-pre-application-consultation. For those without access to the internet, computer facilities have been identified for public use at Rhayader Library, West Street, Rhayader, Powys, LD6 5AB. The library is open Monday 9:00 to 13:00 and 14:00 to 16:30, Wednesday 14:00 to 18:00, Friday 10:00 to 13:00 and 14:00

to 16:30, Saturday 10:00 to 12:00. The library is closed on a Tuesday, Thursday and Sunday.

SAB Pre-App

- 3.8 At the time of preparing this statement initial discussions with the SAB engineer have been undertaken, however, no official pre-application submission has been made. Through the process of these discussions and subsequent site investigation the SuDs design will be further developed and established.

Proposed Development

Background

- 4.1 The proposed development seeks to refurbish and extend the existing Elan Valley Visitor Centre, along with associated works (including parking rationalisation and landscaping works), in order to deliver a high-quality, modern, and sustainable visitor centre in the Elan Valley.
- 4.2 As per the accompanying Design and Access Statement, the primary function of the redeveloped visitor centre aims to provide a place to; *“Attract, Welcome, Shelter, Orientate, Share local stories about Elan Valley’s past, present, future and importantly - its Community, whilst creating new Memories before bidding a fond Farewell to its Visitors departing, either to travel home or to explore further around the Elan Valley Lakes.”*
- 4.3 The principle objective of the redeveloped visitor centre is to attract local, regional, and far travelling, first-time or repeat visitors to the Elan Valley to enjoy the local area’s unique and high-quality natural environment. The redeveloped facility will offer compelling experiences with warm hospitality offered, combined with authentic local pride.
- 4.4 The incremental growth and development of the Elan Valley visitor centre in recent years has led to the existing facility experiencing challenges, relating to operational peak-time stress imposed upon the space and infrastructure available. As such, the redevelopment of the facility has been identified as a well-needed scheme, guided by the Elan Valley Project and Mid Wales Growth Deal, in order to deliver a flagship visitor centre through the upgrading of existing facilities and infrastructure, and the provision of new amenity and services. This is anticipated to generate significant numbers of new jobs and other employment-related activity, in addition to generating significant economic growth for the future in this part of Powys.

Amount, Scale and Layout

- 4.5 As per the accompanying proposed layout drawings, the proposed development comprises the rationalisation of existing uses found at the visitor centre, in addition to the introduction of new uses. These include an enhanced foyer area, meeting rooms and office spaces, larger and improved kitchen facilities, exhibition spaces, redeveloped toilet and bathroom facilities, a planetarium, restaurant and a café, and visitor centre shop. These uses are to be located across the site’s ground floor, with additional meeting room facilities proposed across the site’s upper (first) floor.
- 4.6 The height of the redeveloped facility is proposed to remain at a maximum height of two storeys, with no overall height increases proposed.

- 4.7 The proposed layout indicates that the area to the west of the existing facility is to be utilised for amenity space and informal/formal play spaces. Several aspects of the existing facility are proposed to be retained, including existing shrubbery to the east of the facility, the existing bike hub, and the existing grass/gravel/asphalt area to the east of the visitor centre.
- 4.8 The proposed development will cumulate in a total of 1,391m² gross internal floorspace being generated, spread out across the ground floor (1,257m²) and first floor (134m²). This is calculated to result in a gross internal floorspace area of 693m² on the existing Elan Valley visitor centre.
- 4.9 In full, the proposed development will facilitate the development and/or retention of the following uses:
- Working/Conference/Meeting Spaces;
 - Enhanced café and restaurant facilities;
 - A Museum;
 - A new Planetarium with enhanced audio-visual experiences;
 - Playing facilities;
- 4.10 As part of the development proposals, it is proposed to 'envelope' the existing facility. This will not only allow for increased floorspace generation for the redeveloped facility, but will also facilitate improved heating/energy efficiency in addition to introducing high-quality facades across the facility.

Roads, Access and Parking

- 4.11 The proposed development will utilise the existing access road serving the visitor centre, which connects Elan Valley with Rhayader. This is considered to be of acceptable standard with regard to width, passing places, and road surface quality.
- 4.12 As indicated within the accompanying layout, the proposed development comprises the rationalisation of the existing car parking arrangement located at the application site, cumulating in a total of 70no. formal car parking spaces, inclusive of EV charging spaces (6) and disabled car parking spaces (4). 13 of these car parking spaces are proposed for staff, located to the north of the visitor centre. In addition, a total of 6no. motorcycle parking spaces are proposed, immediately to the east of the proposed building footprint.
- 4.13 In addition, long and short-stay bicycle parking provision is proposed across the proposed site layout, cumulating in a total of 22no. new cycle parking (12no. sheltered long stay spaces, 10no. short stay spaces) being delivered, in addition to the existing 4no. short-stay floor mounted cycle rack already in use.
- 4.14 The proposed level of car parking provision has been tailored to accommodate the number of existing and proposed staff working at

the visitor centre, in addition to the forecast number of vehicle trips made by visitors (detailed within the accompanying Transport Statement).

- 4.15 It is possible that Public Right of Way 144/250/1 may be affected by the car parking proposals. If that is the case then either the parking will be relocated or a formal PROW diversion will be requested.

Appearance and Materials

- 4.16 The surrounding built environment is considered to be characterised by brick and slate work, which reflect the character and heritage value of the surrounding Elan Valley and the Registered Historic Landscape.
- 4.17 Accordingly, the proposed pallet for the proposed development comprises a similar material pallet in place for the existing facility, inclusive of slate roofing, sash windows, and brick commonly associated with buildings constructed in the late 19th / early 20th century in Mid and North Wales, in addition to materials of a more recent age due to the extensions and alterations taken place at the site since the 1980s.
- 4.18 The materials proposed include local stone and timber, stone walls, steel trusses, framed glazing and timber, and standing-seam patinated roofing. In addition, door and window detailing is proposed to mimic that found at the existing building presently.

Green Infrastructure and Biodiversity Enhancements

- 4.19 A key component of the development proposals comprise the retention and enhancement of the site's green infrastructure and biodiversity context.
- 4.20 As indicated within the accompanying proposed layout and landscaping scheme (Arup) have looked to incorporate high-quality landscaping enhancement measures for biodiversity in accordance with the measures detailed within the Environment (Wales) Act 2016.
- 4.21 As established within the accompanying landscaping package, the landscape proposal for the site seeks to incorporate areas of hard and soft landscaping to the west of the visitor centre. This includes the planting of trees surrounding the proposed formal play area, in addition to the retention of trees at the south-west of the site which will continue to provide screening at this part of the site.
- 4.22 Further tree planting is proposed to the east of the visitor centre, which will provide screening over some of the car parking areas proposed, in addition to contributing to the appearance and landscape quality at the east of the site at the proposed welcome area. The proposed tree mix includes *Betula pendula*, *Sorbus aucuparia*, *Crataegus monogyna*, and *Quercus robur*. These have been identified and chosen in order to align with the existing species

located within the site boundary and immediate setting, in order to create clusters of high-quality species of a similar appearance.

- 4.23 In addition, it is also proposed to incorporate the planting of amenity grass, native wildflower/grass, and native mixed planting (shrubs, perennials, and grass) across the redeveloped site boundary. This will strengthen the existing planting context at the site, with several areas of shrubbery and wildflowers also proposed to be retained. The proposed planting will therefore mainly consist of native species, incorporating a mix of pollinator-friendly plants to enhance biodiversity.
- 4.24 The planting typology is primarily inspired by the existing vegetation on site, including riparian plantings along the river and pioneer species on the mineral slope.
- 4.25 Areas for drainage provision, including SUDs, are also proposed in accordance with national and local planning policy, through the provision of swale and ditch planting. This, in addition to the incorporation of permeable paving and surfaces, will allow for the appropriate and sufficient management of the drainage of the wider site.
- 4.26 The proposed development also comprises the introduction of a number of measures for the enhancement of local biodiversity, including the introduction of bird boxes, bat boxes, and hibernacula/habitat piles.

Drainage

- 4.27 Due to the nature of this brownfield site, it is proposed that the site's levels are to remain largely as existing. Opportunities have been identified to slightly reprofile ground to the west of the visitor centre, encouraging water towards SuDS features through overland channels.
- 4.28 Proposed SuDS features have been strategically positioned outside of pedestrian desire lines to break up catchment areas and in existing low spots across the site. The existing topography naturally falls towards the Afon Elan and so exceedance routes have been considered so that SuDS act in series to improve treatment capacity and resilience
- 4.29 To reduce surface water flood risk exacerbated by valley runoff, a ditch or bund is proposed along the northern edge to divert runoff away from the car park and to join to overland flow route to Afon Elan.
- 4.30 Permeable paving is proposed for car park spaces (block paving and grasscrete) and the west pedestrian zones (resin bound gravel). Refer to Landscape Material Strategy for more information.

Energy

- 4.31 The existing visitor centre is understood to have challenges in maintaining efficient energy performance. As such, the proposed development has an energy strategy which is reliant on the immediately available renewable sources within the site's vicinity.
- 4.32 The new facility envelope is considered to be of high energy performance, which wraps the facility creating a thermal buffer to reduce further energy loss.
- 4.33 The facades and roof of the redeveloped facility are proposed to have high performance characteristics, including sustainable materials which will improve the overall energy targets of the facility.
- 4.34 As a result of the proposed enveloping of the facility, many of the existing windows are identified to become internalised. Where existing windows are still externalised, high performance jointless glazing systems will be installed, which will provide an additional layer for energy performance.

Planning Policy Context

Introduction

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the purposes of this Planning Application comprises the following:

- National Development Framework: Future Wales – The National Plan 2040 (February, 2021);
- The Powys Local Development Plan (2011-2026) (Adopted April 2018).

5.2 In addition to the Development Plan, the Planning Application has been informed by policy and guidance set out in the following:

- Planning Policy Wales Edition 12 (February, 2024), informed by The Well-Being of Future Generations (Wales) Act 2015, and supplemented by Technical Advice Notes;
- Powys County Council Supplementary Planning Guidance (SPG)

5.3 This section of the Planning Statement provides an overview of the Development Plan context and planning policy framework of specific relevance to the determination of this application. For ease of reference, this overview is set out below at the national and local level.

National Level

5.4 The Well-Being of Future Generations (Wales) Act 2015 (which came into force on 1st April 2016) requires “public bodies to do things in pursuit of the economic, social, environmental and cultural well-being of Wales in a way that accords with the sustainable development principle”. The Act sets out seven ‘well-being’ goals as follows:

• *A prosperous Wales: An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.*

• *A resilient Wales: A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).*

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

5.5 Within the Act, sustainable development is defined as follows: “the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals”. The Act sets out that when making decisions, public bodies need to take into account the impact they could have on people living in Wales in the future and must apply the sustainable development principle in all decisions.

National Development Framework: Future Wales – The National Plan 2040

5.6 The National Development Framework: Future Wales – the National Plan 2040 was published on 24th February 2021. ‘Future Wales’ sets out the Welsh Government’s strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy; achieving decarbonisation and climate-resilience; developing strong ecosystems; and improving the health and well-being of our communities.

5.7 Future Wales sets out its overarching ambitions based on the national planning principles and national sustainable placemaking outcomes set out in Planning Policy Wales by means of 11 Outcomes. As set out on Page 52 of Future Wales, the 11 Outcomes are collectively a statement of where the Welsh Government aspire Wales to be in 20 years’ time, as follows:

A Wales where people live:

1. *...and work in connected, inclusive and healthy places*
2. *...in vibrant rural places with access to homes, jobs and services*
3. *...in distinctive regions that tackle health and socio-economic*

inequality through sustainable growth

4. ...in places with a thriving Welsh Language

5. ...and work in towns and cities which are a focus and springboard for sustainable growth

6. ...in places where prosperity, innovation and culture are promoted

7. ...in places where travel is sustainable

8. ...in places with world-class digital infrastructure

9...in places that sustainably manage their natural resources and reduce pollution

10. ...in places with biodiverse, resilient and connected ecosystems

11. ...in places which are decarbonised and climate-resilient.

Rural Economy

5.8 Policy 5 of Future Wales advises:

“The Welsh Government supports sustainable and vibrant rural communities.

Strategic and Local Development Plans must identify their rural communities, assess their needs and set out policies that support them. Policies should consider how age balanced communities can be achieved, where depopulation should be reversed and consider the role of new affordable and market housing, employment opportunities, local services and greater mobility in tackling these challenges.”

5.9 On vibrant rural areas, the subtext below Policy 5 states:

“Foundational economic activities remain the backbone of the rural economy. In particular, tourism and leisure is recognised as a major and growing employer and contributor to the Welsh rural economy. Sustainable forms of tourism, including opportunities for active, green, and cultural tourism, should be explored.”

Placemaking

5.10 Placemaking forms a key concept upon which many national planning policies are based. It is set out at Page 65 of Future Wales that “Placemaking is at the heart of the planning system in Wales and this policy establishes a strategic placemaking approach and principles to support planning authorities to shape urban growth and regeneration”.

Biodiversity and Green Infrastructure

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

5.12 In addition, the associated importance of green infrastructure is highlighted: *“As the population of Wales becomes increasingly urban, the opportunity to optimise well-being benefits from green infrastructure will be greatest in and around these areas. Innovative*

use of nature-based solutions and integrating green infrastructure in and around urban areas can help restore natural features and processes into cities and landscapes. Providing locally accessible, high quality green spaces and corridors helps to maintain and enhance the strategic functioning of our natural resources and ecological networks and address physical and mental well-being” (page 78).

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

Policy 9 – Resilient Ecological Networks and Green Infrastructure To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to:

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

- 5.14 In respect of climate change, Future Wales confirms that:

“It is vital that we reduce our emissions to protect our own well-being and to demonstrate our global responsibility. Future Wales, together with Planning Policy Wales will ensure the planning system focuses on delivering a decarbonised and resilient Wales through the places we create, the energy we generate, the natural resources and materials we use, and how we live and travel.”

Mid Wales

- 5.15 Regarding the growth of the mid Wales economy, Policy 26 of Future Wales states:

“The Welsh Government supports the growth and development of existing and new economic opportunities across Mid Wales. The Welsh Government will work with local authorities, communities, stakeholders and businesses to ensure that its investments and policies support a strong regional economy.

Strategic and Local Development Plans must develop policies that support agricultural and land based traditional rural enterprises; and provide a flexible framework to support the development of new, innovative and emerging technologies and sectors”

The subtext supportive of this Policy identifies tourism as an important sector to the Mid Wales economy, where opportunities for green, active, and cultural tourism should be explored (Page 138).

Planning Policy Wales, Edition 12

- 5.16 Planning Policy Wales (PPW) Edition 12 was published in February 2024. 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.
- 5.17 Sustainable Development is defined at Page 7 of PPW as follows: *“the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals”*.
- 5.18 Paragraph 1.18 sets out that *“Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated”*
- 5.19 In accordance with the National Development Framework, placemaking is also at the heart of PPW – Paragraph 2.1 for example, states that *“Everyone engaged with or operating within the planning system in Wales must embrace the concept of placemaking in both plan making and development management decisions in order to achieve the creation of sustainable places and improve the well-being of communities”*.
- 5.20 Paragraph 2.3 of PPW states that *“The planning system should create sustainable places which are attractive, sociable, accessible, active, secure, welcoming, healthy and friendly. Development proposals should create the conditions to bring people together, making them want to live, work and play in areas with a sense of place and well-being, creating prosperity for all”*.
- 5.21 PPW states that previously developed ('brownfield') land should be used in preference, where possible, over greenfield land. The definition of previously developed land is provided on Page 37 of PPW:

“Previously developed (also known as brownfield) land is that which is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated fixed surface infrastructure. The curtilage (see note 1 below) of the development is included, as are defence buildings and land used for mineral extraction and waste disposal (see note 2 below) where provision for restoration has not been made through development management procedures.

Excluded from the definition are:

- land and buildings currently in use for agricultural or forestry purposes;*
- land which has not been developed previously, for example parks, recreation grounds, golf courses and allotments, even though these areas may contain certain urban features such as paths, pavilions and other buildings;*
- land where the remains of any structure or activity have blended into the landscape over time so that they can reasonably be considered part of the natural surroundings;*
- land which is species rich and biodiverse and may qualify as section 7 habitat' or be identified as having nature conservation value; fn Environment Act; and*
- previously developed land subsequently put to an amenity use."*

- 5.22 The importance of good design in development proposals is highlighted in Paragraph 3.3 of PPW, which states:

"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".

- 5.23 On environmental impacts, and registered historic landscapes, Paragraph 6.1.21 of Planning Policy Wales states:

"The register should be taken into account in decision making when considering the implications of developments which meet the criteria for Environmental Impact Assessment or, if on call in, in the opinion of the Welsh Ministers, the development is of a sufficient scale to have more than a local impact on the historic landscape... an assessment of development on a historic landscape may be required if it is proposed within a registered historic landscape or its setting and there is potential for conflict with development plan policy."

- 5.24 Regarding tourism development and the planning system, Paragraph 5.2.2 of PPW stipulates:

"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. The planning system can also assist in enhancing the sense of place of an area which has intrinsic value and interest for tourism. In addition to supporting the continued success of existing tourist areas, appropriate tourism-related

development in new destinations is encouraged. In some places however there may be a need to limit new development to avoid damage to the environment or the amenity of residents and visitors.”

5.25 Regarding tourism development in rural areas, Paragraph 5.5.3 states:

“In rural areas, tourism-related development is an essential element in providing for a healthy and diverse economy. In addition to more traditional forms of rural tourism, planning authorities should plan positively for active, green and cultural tourism where they are appropriate. Development should be sympathetic in nature and scale to the local environment.”

5.26 Paragraph 6.1.09 of PPW advise that decisions made through the planning system should fully consider the impact of a development on the historic environment, and on the significance and heritage values of individual historic assets, in addition to their contribution to character of place.

5.27 Paragraph 6.1.10 of PPW states *“there should be a general presumption in favour of preserving or enhancement of a listed building and its setting, which might extend beyond its curtilage. For any development proposal affecting a listed building or its setting, the primary material consideration is the building, its setting, or any features of special architectural or historic interest which it possesses.”*

Technical Advice Notes

5.28 The following Technical Advice Notes (TANs) are of relevance to the proposed development.

5.29 *TAN5 Nature Conservation and Planning (2009)* provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. It seeks to demonstrate how local planning authorities, developers and key stakeholders in conservation can work together to deliver more sustainable development that does not result in losses from the natural heritage but instead takes every opportunity to enhance it.

5.30 *TAN6 Planning for Sustainable Rural Communities (2010)* advises how sustainable and vibrant growth can be achieved in Wales’s rural communities, in order to promote social inclusion and provide the necessary resources to support local services and maintain Wales’s natural environment and landscapes.

5.31 *TAN12 Design (2016)* provides advice on how ‘promoting sustainability through good design’ and ‘planning for sustainable building’ may be facilitated through the planning system.

5.32 *TAN13 Tourism (1997)* provides guidance on tourism developments and how they should be informed by development plans and the planning system. Within TAN13, tourism is identified as a major

contributor to the Welsh economy, and comprises a range of different, interrelated activities and operations which overlap with uses including leisure and recreation.

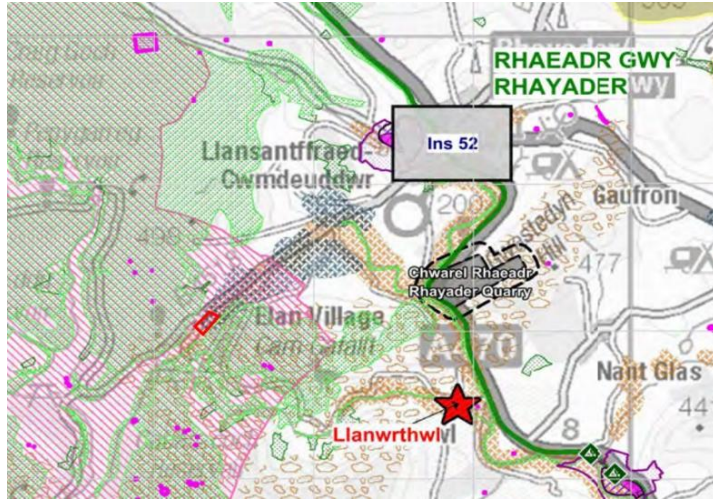
- 5.33 *TAN15 Development and Flood Risk (2004)* provides technical guidance which supplements national planning policy on flood risk, sustainability, and new development. Accordingly, new development should aim to be located in areas outside of high flood risk, and, if located within a high risk area (Zone C), should be justified on the basis of location necessity and consequence assessment.
- 5.34 *TAN18 Transport (2007)* sets out guidance on achieving an efficient and sustainable transport system through the development process. It identifies the relationship between the location of new development and the relevant transport contexts, and how the influence on the location, scale, and density of development can help in reducing travel times and journey lengths.
- 5.35 *TAN23 Economic Development (2014)* advises how the planning system can contribute towards securing economic growth across Wales. Regarding the rural economy, Paragraph 3.1.1 includes tourism uses within the definition for 'rural enterprise', while Paragraph 3.1.3 recognises that rural development is often heavily dependent on the specific needs and location of existing businesses and uses.
- 5.36 *TAN24 Historic Environment (2017)* provides guidance on how the planning system considers the historic environment during development proposal formulation and decision making on both planning and listed building consent (LBC) applications.
- 5.37 On Registered Historic Landscapes, Paragraph 5.40 of TAN24 advises that development proposals which affect Historic Landscapes should provide LANDMAP analysis and be accompanied by an Environmental Statement.

Local Level

Powys Local Development Plan 2011-2026

- 5.38 The Powys County Council Local Development Plan was adopted in April 2018 and is the prevailing development plan for the county of Powys. As such, it is a material consideration for planning applications within Powys.

5.39 As shown below, The Powys County Council Local Development Plan Proposals Map indicates that the site is not located within the defined settlement boundary, and is therefore located within the open countryside. The application site is identified to be located within the Registered Historic Landscape (RHL 5).



5.40 The following Local Development Plan policies are considered to be the most relevant in the context of the proposed development:

Policy Reference	Referring to
Strategic Policies	
SP5	Settlement Hierarchy
SP6	Distribution of Growth across the Settlement Hierarchy
SP7	Safeguarding of Strategic Resources and Assets
Development Management Policies	
DM1	Planning Obligations
DM2	The Natural Environment
DM4	Landscape
DM5	Development and Flood Risk
DM6	Flood Prevention Measures and Land Drainage
DM7	Dark Skies and External Lighting
DM13	Design and Resources
DM14	Air Quality Management
DM15	Waste Within Developments
E2	Employment Proposals on Non-Allocated Employment Sites
Topic Based Policies	
T1	Travel, Traffic and Transport Infrastructure
TD1	Tourism Development

5.41 The settlement hierarchy for Powys is set out in LDP Policy SP5. This confirms that the site is located within the Open Countryside, outside of the settlement defined settlement boundary.

5.42 Policy SP6 sets out how growth is to be achieved across the settlement hierarchy within Powys. This states that Powys's open countryside will be *"protected from inappropriate development"*, with proposals expected to comply with relevant national planning policy and all relevant LDP Policies, including design, resources, flood risk, transport, and tourism.

5.43 As the application site is located within the Registered Historic Landscape, Policy SP7 'Safeguarding of Strategic Resources and Assets' is of relevance. This states:

"To safeguard strategic resources and assets in the County, development proposals must not have an unacceptable adverse impact on the resource or asset and its operation.

The following have been identified as strategic resources and assets in Powys:

1. Land designated at international, European and/or national level for environmental protection.

2. Historic environment designations, including:

i. Registered Historic Landscapes.

ii. Registered Historic Parks and Gardens.

iii. Scheduled Ancient Monuments and other archaeological remains.

iv. Listed Buildings and their curtilages.

v. Conservation Areas. AND the setting of designations i.-v.

3. Recreational Assets, including:

i. National Trails.

ii. Public Rights of Way Network.

iii. Recreational Trails.

iv. National Cycle Network.

4. The valued characteristics and qualities of the landscape throughout Powys.

5. Sennybridge (Ministry of Defence) Training Area.

6. Mineral Resource Areas.

7. Proposed Strategic Infrastructure Routes (if and when identified)."

5.44 Policy DM2 'The Natural Environment' sets out how development proposals should demonstrate how they protect, manage, and enhance biodiversity and geodiversity interests within Powys.

5.45 Policy DM4 'Landscape' of the Powys Local Development Plan aims to minimise impacts on the local landscape generated by new development. This states:

“Proposals for new development outside the Towns, Large Villages, Small Villages and Rural Settlements defined in the Settlement Hierarchy must not, individually or cumulatively, have an unacceptable adverse effect, on the valued characteristics and qualities of the Powys landscape. All proposals will need to:

1. Be appropriate and sensitive in terms of integration, siting, scale and design to the characteristics and qualities of the landscape including its: topography; development pattern and features; historical and ecological qualities; open views; and tranquillity; and

2. Have regard to LANDMAP, Registered Historic Landscapes, adjacent protected landscapes (National Parks and Areas of Outstanding Natural Beauty) and the visual amenity enjoyed by users of both Powys landscapes and adjoining areas.

Proposals which are likely to have a significant impact on the landscape and/or visual amenity will require a Landscape and Visual Impact Assessment to be undertaken.”

5.46 As per Policy DM5 ‘Development and Flood Risk’ of the Powys LDP, development proposals must be located away from tidal or fluvial flood plains unless it can be demonstrated that the site is justified in line with national guidance, accompanied by a detailed technical assessment.

5.47 Regarding the potential impacts of external lighting onto the dark skies of Powys, Policy DM7 ‘Dark Skies and External Lighting’ of the Powys LDP states:

“Development proposals involving external lighting will only be permitted when a lighting scheme has been provided that demonstrates that the lighting will not individually or cumulatively cause:

*1. Unacceptable levels of light pollution especially in the countryside.
2. An unacceptable adverse effect on the visibility of the night sky.
3. A nuisance or hazard to highway users including pedestrians, and local residents. 4. An unacceptable disturbance to protected species.”*

5.48 Policy DM13 ‘Design and Resources’ sets out how the Council look to secure high-quality design for each development proposal. As such, development proposals must demonstrate that (inter alia) it has been designed to complement the character of the local area in terms of appearance and scale, it contributes towards local distinctiveness, it does not have an adverse impact on existing tourism assets, it creates attractive and safe spaces, and makes full provision for those with disabilities.

5.49 Local Development Plan Policy DM14 ‘Air Quality Management’ states:

“Development proposals will only be permitted where any resultant air pollution does not cause or lead to an unacceptable risk of harm to human health or the natural environment. Proposals will need to demonstrate that measures can be taken to overcome any significant adverse risk, with particular attention being paid to:

1. National Air Quality Strategy objectives and any Air Quality Management Areas.

2. The critical levels for the protection of habitats and species within a European site or Site of Special Scientific Interest in accordance with Policy DM2.”

5.50 Policy DM15 ‘Waste Within Developments’ states that development proposals must demonstrate how the production of waste will be minimised at all stages of development, and that adequate provision has been made in the design of the development for the storage, collection, and recycling of waste materials.”

5.51 Policy E2 ‘Employment Proposals on Non-Allocated Employment Sites’ is a permissive criteria based policy which is supportive of employment generation on non-allocated sites. The supporting text to the policy in paragraph 4.46 states that *“In addition, the appropriate expansion or modernisation of existing businesses insitu is supported to reduce the inconvenience and disruption of moving, whilst retaining the source of employment within the local community.”*

5.52 Regarding the relationship between travel and development proposals, LDP Policy T1 states:

“Policy T1 – Travel, Traffic and Transport Infrastructure Transport infrastructure, traffic management improvements and development proposals should incorporate the following principal requirements:

- 1. Safe and efficient flow of traffic for all transport users, including more vulnerable users, and especially those making ‘Active Travel’ journeys by walking or cycling;*
- 2. Manage any impacts to the network and the local environment to acceptable levels and mitigate any adverse impacts; and,*
- 3. Minimise demand for travel by private transport and encourage, promote and improve sustainable forms of travel including Active Travel opportunities in all areas. Transport infrastructure improvements will be supported where they promote sustainable growth, maximise the efficiency and safety of the transport systems, improve public and private transport integration and encourage passenger and freight rail operations.”*

5.53 Given the proposals put forward within this planning application, Policy TD1 ‘Tourism Development’ of the Powys Local Development Plan is considered highly pertinent. In full, this states:

“Development proposals for tourist accommodation, facilities and attractions, including extensions to existing development, will be permitted as follows:

- 1. Within settlements, where commensurate in scale and size to the settlement.*
- 2. In the open countryside, where compatible in terms of location, siting, design and scale and well integrated into the landscape so that it would not detract from the overall character and appearance of the area and in particular where:
 - i. It is part of a farm diversification scheme; or*
 - ii. It re-uses a suitable rural building in accordance with TAN 6; or*
 - iii. It complements an existing tourist development or asset, without causing unacceptable adverse harm to the enjoyment of that development or asset; or*
 - iv. It is not permanent in its nature.**
- 3. Accommodation shall not be used for permanent residential accommodation.”*

Supplementary Planning Guidance

5.54 The following Supplementary Planning Guidance (SPG) adopted by Powys County Council is of relevance to the proposed development:

- Biodiversity and Geodiversity SPG (Adopted October 2018)
- Historic Environment SPG (Adopted July 2021)
- Landscape SPG (Adopted April 2019)
- Planning Obligations SPG (Adopted October 2018)

Appraisal

Overview

6.1 This section aims to identify the main issues relevant to the determination of the application and assess the scheme against the relevant planning policy framework. These matters are considered to be as follows:

- **Principle of Development**
- **Heritage Matters;**
 - Impact of the development on the **Registered Historic Landscape;**
 - Impact on nearby **Heritage Assets;**
- The impact of the development on **biodiversity, the local landscape and trees.**
- The impact of the development on the **local highway network.**
- The impact of the development on **flood risk.**

Principle of Development

6.2 With regard to the principle of development, the application site is located outside of the defined settlement boundary and is categorised as open countryside land. Notwithstanding, the development comprises an extension to an existing facility on previously developed land. Furthermore, the site is an established tourism use.

6.3 Powys Local Development Plan SP6 'Distribution of Growth Across the Settlement Hierarchy' advises that development proposals within the open countryside must comply with relevant national policy, including PPW and TANs (including TAN 6 and TAN 23), in addition to relevant development management and topic based policies, including on design and resources, landscape, the natural environment, air and water quality, transport, and waste.

6.4 On the matter of tourism development, Policy TD1 confirms that tourist facilities and attractions, including extensions, will be permitted where compatible to the siting and design, and where it complements an existing tourist asset without causing adverse harm to the enjoyment of that asset and the wider area.

6.5 Policy TD1 has three criteria which are used in the determination of tourism-related development proposals. In full, these are:

"1. Within settlements, where commensurate in scale and size to the settlement;

2. In the open countryside, where compatible in terms of location, siting, design, and scale and well integrated into the landscape so that it would not detract from the overall character and appearance of the area and in particular where:

i. It is part of a farm diversification scheme; or

- ii. It re-uses a suitable rural building in accordance with TAN6; or*
 - iii. It complements an existing tourist development or asset, without causing unacceptable adverse harm to the enjoyment of that development or asset or;*
 - iv; It is not permanent in its nature.*
- 3. Accommodation shall not be used for permanent residential accommodation.*

Given the pertinence of Policy TD1 with regard to the development proposals put forward within this planning application, it is considered necessary to critique each of the above criterion on a point-by-point basis.

1. Within settlements, where commensurate in scale and size to the settlement;

As established, the proposed development is located outside of the defined settlement boundary and is located within the open countryside. As such it is not located within a settlement and this criterion is not considered applicable for the determination of this planning application.

2. In the open countryside, where compatible in terms of location, siting, design, and scale, and well integrated into the landscape so that it would not detract from the overall character and appearance of the area and in particular where:

i. It is part of a farm diversification scheme; or

As set out within this planning statement, the proposed development does not comprise a farm diversification scheme. As such, this criterion is not considered to be applicable for the purposes of determining this planning application.

ii. It re-uses a suitable rural building in accordance with TAN6; or

The proposed development comprises the redevelopment of the existing Elan Valley Visitor Centre, which has served as a visitor centre since the mid-1980s following its conversion from a former workshop (application ref: R2085). The facility consists of a number of buildings which have been added to the original former workshop in recent years through various extensions, including in 1996 (PR250801), where it is considered to represent a well-established rural building.

The proposed development introduces some new uses to the existing visitor centre, but it is not considered to constitute a total 're-use' of the building. As such, it is considered that this criterion is satisfied for the purposes of assessing the proposed development with this part of Policy TD1 of the Powys Local Development Plan.

iii. It complements an existing tourist development or asset, without causing unacceptable adverse harm to the enjoyment of that development or asset; or

As established, the proposed development comprises the proposed refurbishment and extension of the existing Elan Valley Visitor Centre, in order to deliver a modern, high-quality, and sustainable 'flagship' facility to support the sustainable growth of the Elan Valley in line with the overarching goals and aims of the Mid Wales Growth Deal. This criterion is considered to be the most pertinent in this policy.

As set out within this planning statement, the development proposals comprise the upgrading of the existing facilities and infrastructure found at the existing visitor centre, the provision of new amenities, and services, and the addition of new and enhanced experiences for public enjoyment within the setting of the Elan Valley. It would also comprise an administrative hub for the administration and management team of the Elan Valley.

Accordingly, it is not considered that the proposed development would cause unacceptable harm to the enjoyment of the existing facility. Indeed, it is considered that the proposed development would result in the enjoyment of the facility being increased significantly for all future patrons. As such, it is considered that this criterion is satisfied for the purposes of the consideration of the development proposal, *subject to no unacceptable adverse harm being caused*. This latter element is addressed later in this Planning Statement and in the accompanying technical documentation.

iv. It is not permanent in its nature.

By virtue of the nature of the proposed development, it is considered to be permanent in nature, on the basis that full planning permission, and not temporary planning permission, is being sought. As such, this criterion is not considered to be applicable for the purposes of determining this planning application.

3. Accommodation shall not be used for permanent residential accommodation.

As established, the proposed development comprises the refurbishment and extension of the existing Elan Valley Visitor Centre. It does not propose any element of residential uses, including permanent residential accommodation (Use Class C3) as part of the proposed development. As such, it is considered that this criterion is satisfied for the purposes of the consideration of the proposed development with Policy TD1.

- 6.6 In line with the above, it is considered that the principle of development is acceptable in high level terms as it complies with criterion iii) in that it complements an existing development or asset.

However, it is acknowledged that to fully satisfy this criterion it needs to be demonstrated that the proposed development does not cause any unacceptable harm, and this element is addressed later in this statement.

- 6.7 LDP Policy DM13 'Design and Resources' sets out a number of criteria for which development proposals should, where relevant, satisfy. This includes ensuring that appropriate scale/massing considerations are made, incorporating elements of placemaking, and ensuring that the development does not have an unacceptable adverse impact on existing and established tourism assets and attractions – which is of relevance to this planning application.
- 6.8 As stated within the accompanying Design & Access Statement, the design of the proposed development has been informed by place, history, climate change, biodiversity, the sustainable supply and sourcing of materials, and the character and context of the site's setting. As such, the proposed development is considered to be of a high design standard, featuring a material palette comprising local stone and timber, steel trusses, framed glazing, and standing-steam patinated roofing, which will mimic the existing buildings located at the facility and enhance the local landscape. As such, it is considered that the proposed development satisfies the design principles and criteria set out within LDP Policy DM13 'Design and Resources'.
- 6.9 Policy EM2 seeks to ensure that proposals for employment development on non-allocated sites will be permitted where it is demonstrated that *no other suitable existing or allocated employment sites or previously developed land can reasonably accommodate the proposal*.
- 6.10 Firstly, the proposals are an extension to an existing visitor centre for the Elan Valley to improve the existing offer therefore it is not considered that an alternative site *can reasonably accommodate the proposal*, and if so that site would also likely be outside settlement boundary. The first test of Policy E2 is therefore considered to be met.
- 6.11 The rest of the policy requires 1 of the 3 following tests to be met.
1. *The proposal is up to 0.5ha. and is located within or adjoining a settlement with a development boundary.*

Whilst the site area measures approx. 1.57ha the actual main element of the development (the extension) is significantly under 0.5ha, with the rest of the site area comprising landscaping and car park reconfiguration. Notwithstanding, the site is not within or adjoining a development boundary so this criterion is not applicable.

2. *The proposal is for the limited expansion, extension or environmental improvement of existing employment sites and buildings.*

The proposed development comprises a limited expansion of the existing building, which measures 698m². The pre-application scheme comprised a building that would deliver 1,570m². Following pre-application discussions, the additional floorspace has been reduced so that the developed scheme will result in a new floorspace of 1,391m². This is below the accommodation required in the Strategic Brief from the client so the new offer has been compromised to address pre-application comments.

The Design and Access Statement, Heritage Assessment and Landscape and Visual Appraisal that accompany this application all conclude that the proposed development is acceptable in the context of the building, the heritage asset and the wider landscape, with the specific conclusions on the Heritage Assessment addressed under Heritage Matters below.

The changes to the scheme remove the proposed eastern development so the eastern elevation, which is the approach to the visitor centre and the first impression many visitors will get, is less changed than the pre-application scheme. These revisions will enable the railway engine doors to be repurposed and will retain their ability to be appreciated by visitors

The extension will also improve the thermo-efficiency of the existing building as set out in the DAS.

Consequently, it is considered that the proposed development is a limited expansion in the form of an extension and it will improve the environmental performance of the building. Policy E2 is therefore complied with as only one of the three criteria needs to be met

3. *The proposal is appropriate in scale and nature to its location and is supported by a business case which demonstrates that its location is justified*

Notwithstanding the fact that Policy E2 is complied with by virtue of adherence to criterion 2, as mentioned above the DAS, Heritage Assessment and Landscape and Visual Appraisal all conclude that the proposed development is acceptable in scale and nature. The scheme forms part of a major programme of development led by Dŵr Cymru Welsh Water Visitor Attractions and is known as the Elan Valley Lakes project (EVL). The wider project is securing funding from the Mid Wales Growth Deal (MWGD) for delivery over a 5 year infrastructure period (2024-2029) to vastly improve the wider experience for visitors for the whole of the Elan Valley Lakes. Criterion 3 can also therefore be

complied with, but any business case details would need to be submitted on a private and confidential commercial basis.

- 6.12 Finally in relation to Policy E2, paragraph 4.4.6 states that *"In addition, the appropriate expansion or modernisation of existing businesses insitu is supported to reduce the inconvenience and disruption of moving, whilst retaining the source of employment within the local community."* This scheme comprises appropriate expansion or modernisation of an existing business in situ.
- 6.13 In light of the above, the proposed development for continued and enhanced tourism use is considered to be appropriately justified given the presence of the existing visitor centre and its links to the surrounding natural landscape. As such, it is considered that the proposed development is compliant with national and local planning policy (including TAN13 'Tourism', and LDP Policies SP6 'Distribution of Growth across the Settlement Boundary', TD1 'Tourism Development') and E2 'Employment Proposals on Non-Allocated Employment Sites' relating to the sustainable location of development, good design, tourism development and employment.

Heritage Matters

- 6.14 As established, the application site is located within the Elan Valley Registered Historic Landscape and is also in close proximity to a number of Grade II and Grade II* listed heritage assets, according to Historic Wales' data. Discussions with Cadw have confirmed that the visitor centre itself, however, is not a listed building.
- 6.15 As indicated previously, pre-application discussions with Powys County Council's Heritage Consultee indicate that the Council are of the view that the existing visitor centre is considered to meet the three tests of a curtilage listed structure (physical layout, historic and current ownership, and historic and current function).
- 6.16 Whilst the pre-application response from the Council's Heritage Consultee is duly noted, it is not considered that they are correct in considering the existing visitor centre as curtilage listed. This is due to the fact that although there is clearly a relationship between the Visitor Centre building and the listed structures to the west, this is based on a historical, functional link via the former Elan Valley Railway to their construction phase, rather than the building being 'ancillary' to the function of the dam or hydroelectric station.
- 6.17 In terms of ownership, it is acknowledged that the building lies within the same ownership as the dam, and was at the time of listing. However, the Elan Village houses and the hydroelectric stations were listed on 31st July 1995 and at that time the Visitor Centre building had ceased to function as a workshop and was in its present use. Further, DCWW's landholding is part of their wider estate which extends to c.18,000ha across the surrounding landscape.

- 6.18 Given the large size of the Welsh Water landholding it is considered that being under the same shared ownership is of little relevance to any assessment of whether the building is part of the curtilage of the listed buildings, as many different and entirely unrelated historic assets would therefore fall into this category.
- 6.19 In terms of use, historically the Visitor Centre building was a workshop associated with the repair of engines working on the Elan Valley Railway amongst other likely uses. Whilst the railway was instrumental in facilitating the construction of the dam and many other structures and buildings in the wider valley, it no longer exists, and the Visitor Centre building has ceased to function as a workshop, becoming a tourist Visitor Centre in the 1980s.
- 6.20 As such the building's historical, functional association with the dam and hydro-electric power station is now entirely historic and was ancillary to the process of their construction more so than their actual use, purpose and function.
- 6.21 It is therefore considered that the building is not curtilage listed.
- 6.22 Notwithstanding, EDP's Heritage Assessment concludes that the proposed development results in only a single direct impact upon the non-designated heritage asset comprising the original workshop part of the Visitor Centre building, which is assessed as being of low significance. The building would be subject to a low degree of harm to its low significance mainly on account of how it would become experienced partially, but increasingly within a modern building that would partially obscure its appreciation and historic function to a degree.
- 6.23 In line with the above, whilst some limited harm has been identified, this is considered proportionate with regard to the presence of the existing visitor centre and its operations, historic alterations made to the building over time, and its relationship (indeed, lack of relationship) with identified heritage assets at Elan Valley. Accordingly, the proposed development is considered to not contravene the overarching goals and aims of national planning policy, in addition to TAN24 'The Historic Environment' and Policies SP7 'Safeguarding of Strategic Resources and Assets' and DM4 'Landscape' of the Powys Local Development Plan. Consequently, it is the view of the applicant that the local planning authority can conclude that the proposed development is acceptable in the context of paragraph 6.1.9 of PPW12 given the low level of harm to a non-designated heritage asset which is deemed to be of low significance.

Impact of Development on Biodiversity, the Local Landscape and Trees

- 6.24 The Preliminary Ecological Appraisal (PEA) submitted as part of this planning application identifies neutral grassland across the Site which is subject to regular grazing by sheep, limiting the diversity of the

sward and potential to support a diverse invertebrate assemblage. Where grassland will be lost, this is limited to low distinctiveness habitat, and the proposed grassland and wildflower planting will result more diverse habitats.

- 6.25 Additional protected species surveys for bats and otters are ongoing to determine the presence of or potential for these species on or near to the Site, and to assess the potential impacts on these species. The roof and wall tops of the existing building will be retained so any existing features suitable for bats or birds such as sparrows, swifts or house martins such as crevices and overhangs will be retained to avoid impacts on these species. Several ecological and wildlife habitat measures are proposed with indicative locations at this stage. The placement of habitats, such as bat and bird boxes, will be supervised by an ecologist in subsequent design stages.
- 6.26 The Green Infrastructure Statement and Landscape Design and Access Statement set out that the design thoughtfully draws inspiration from existing landscape features, sightlines, and the surrounding natural and built environments, fostering a harmonious integration with the site's unique character. Furthermore, the landscape design adheres to Green Infrastructure policies and Building with Nature standards, highlighting a strong commitment to sustainability and ecological sensitivity. It also addresses the Sustainable Drainage Systems (SAB) requirements, ensuring that the project is aligned with drainage standards and best practices.
- 6.27 As the project progresses into subsequent RIBA stages, the landscape masterplan will continue to evolve, incorporating more detailed specifications and refinements. The guiding principles established will remain central to the ongoing development, ensuring a cohesive and sustainable landscape design that supports the vision for the Visitor Centre and the broader site.
- 6.28 Overall, the landscape strategy and GI Statement serve as a foundation for future landscape development, laying the groundwork for a thoughtful, well-integrated, and environmentally responsible design that enhances both the visitor experience and the site's natural and built environment.
- 6.29 A small number of trees are proposed to be lost as part of the development, as outlined in the Tree Survey produced by Mackley Davies. Further investigation is required but at present the number of trees proposed to be lost is between 7 and 13, most of which are Category C. 58 trees are proposed to be planted in mitigation which more than exceeds the 3 for 1 minimum ratio requirement set out in PPW12.
- 6.30 As such, the proposed development complies with TAN5, PPW12 and LDP Policies DM2 and DM4.

Impact of Development on the Highway Network

- 6.31 As established, the proposed development seeks to retain the use of the existing access road serving the Elan Valley Visitor Centre, which connects Elan Village to nearby Rhayader. As such, no alterations or material changes to the access road are proposed as part of the development proposals. The pre-application response received from Powys County Council stated that comments had not yet been received from the relevant Highways Consultee regarding the proposed development. At the time of writing this planning statement, these comments have not been received but Arup have been able to undertake discussions with the local highway authority.
- 6.32 With regard to parking, the proposed development seeks to formalise the existing parking arrangement located to the north and east of the existing Visitor Centre. This will result in the provision of 70no. formalised car parking spaces, inclusive of EV and disabled spacing, which are in accordance with national parking guidance on space width and length, in order to act as ancillary to the redeveloped visitor centre.
- 6.33 With regard to bicycle parking provision, a total of 12no. sheltered long-stay and 10no. short stay cycle parking spaces are proposed to be introduced across the site boundary, designed in accordance with the Active Travel Act Guidance 2021. The proposed cycle provision has been calculated to exceed the requirements of CSS Wales Parking Standards.
- 6.34 Given the nature of the proposed scheme, it is not considered to fall within a specific use class within CSS Wales Parking Standards (2014). This includes uses relating to office/meeting rooms (B1 – Business), café/restaurant (A3 – Food & Drink), planetarium (D1 – Non-Residential Institutions), and a visitor shop (A1 – Shop). As indicated within the accompanying Transport Statement, CSS Wales states that the proposed development, based on the uses involved and floorspace generated, should achieve a minimum car parking provision of 60no. spaces and a bicycle parking provision of 7no. spaces.
- 6.35 With regard to trip generation, the accompanying TS identifies that the proposed development is calculated to generate a slight increase on daily trips, inclusive of staff and visitor trips, which is reflective of the enhancement of visitor offering available at the visitor centre.
- 6.36 It is possible that Public Right of Way 144/250/1 may be affected by the car parking proposals. If that is the case then either the parking will be relocated or a formal PROW diversion will be requested.
- 6.37 In light of the above, the planning application demonstrates the development can be delivered in accordance with national planning guidance contained within PPW (12th Edition) and TAN18 (Transport), CSS Wales Parking Standards, as well as Policy T1 'Travel, Traffic, and

Transport Infrastructure' of the adopted Powys Local Development Plan.

Impact of the development on Flood Risk

- 6.38 A Flood Consequences Assessment (FCA) has been produced by Waterco which accompanies this planning application. It identifies that the Welsh Government Development Advice Map shows that the majority of the site is located within Flood Zone A – an area considered to be at little or no risk of fluvial or tidal flooding, with a less than 0.1% (1 in 1000) annual probability of flooding. The south-western boundary of the site is located within Flood Zone C2 – an area considered at flood risk, without significant defence infrastructure, with a 0.1% (1 in 1000) or greater annual probability of flooding.
- 6.39 The main potential source of flooding at this site is fluvial flooding from Afon Elan. The NRW 'Flood Map for Planning' shows that the majority of the existing Visitor Centre is located within Flood Zone 2, meaning it has between a 1% and 0.1% annual probability of flooding, including the effects of climate change. Land surrounding the visitor centre building is located within Flood Zone 1, an area with a less than 0.1% chance of flooding, including the effects of climate change.
- 6.40 A review of the topographical survey shows that the existing visitor centre is not located at a topographically lower level than its immediate surrounds. The existing visitor centre may therefore be shown within Flood Zone 2 as its elevation (ground level) has not been represented accurately within the LiDAR data used by NRW to produce its Flood Map for Planning.
- 6.41 Using the NRW Flood Zone 2 extent, a flood level of 214.85m AOD is estimated for the 0.1% annual probability plus climate change event. Based on the estimated flood levels, depths in the location of the visitor centre vary from 210mm to 20mm.
- 6.42 Where practical, the finished floor levels of any new buildings (extensions) should be set at or above 214.85m AOD. The DAS and proposed plans confirm that the FFL of the extension is set at 214.87m AOD. The flood depths estimated during the 0.1% annual probability plus climate change event are within the tolerable limits of A1.15 of TAN15.
- 6.43 All additional building footprint proposed will be located within Flood Zone 1. Therefore, the redevelopment does not remove flood storage space from the floodplain and will not result in an increase in flood risk elsewhere.
- 6.44 Consequently, the proposed development complies with PPW12, TAN15 and LDP Policy DM5 insofar as they relate to flood risk.

Conclusion

6.45 In conclusion therefore, it has been demonstrated that the proposed development is acceptable in relation to the technical disciplines addressed above *no unacceptable adverse harm* has been identified therefore the proposal also complies with LDP Policy TD1.

Conclusion

- 7.1 This Planning Statement has been prepared on behalf of Dŵr Cymru Welsh Water (DCWW) in relation to the full planning application for the proposed refurbishment and extension of the Elan Valley visitor centre, along with associated works including parking and landscaping.
- 7.2 The proposed development presents an opportunity for Dŵr Cymru Welsh Water to redevelop an existing tourist facility within a well established tourist location in the west of Powys. The development of the site would be delivered in a sympathetic manner with regard to the site's relationship within the Elan Valley Registered Historic Landscape, while achieving adequate provisions for landscaping, biodiversity, parking, and drainage infrastructure,
- 7.3 The application site is located within the undeveloped countryside of Powys, as per the Powys County Council Local Development Plan. Notwithstanding, and as established, it is considered to be a recognisable location for tourist development ancillary to the Elan Valley. The application site is not considered to be at risk of sea, river, or surface water flooding, as indicated by NRW flood risk data in addition to drainage data obtained during the early stages of development formulation.
- 7.4 In line with national planning policy, design measures have been considered and formulated with placemaking principles in mind, where it is considered that the scheme is of high-quality, sustainable nature.
- 7.5 In light of the above, it is considered that the proposed development is in accordance with national and local planning policies, including key Local Development Plan Policies – Policy SP6 'Distribution of Growth Across the Settlement Boundary', DM2 'The Natural Environment', DM4 'Landscape', and TD1 'Tourism Development', and is acceptable in regard to principle and other material matters.