

Draft Minutes of Llangors Community Council Planning Application Decision meeting
Held at Llangors Community Centre on Monday 22 July 2024

Members present: Cllr A Jevons (Chair), Cllr D Scully, Cllr Mrs C Owen, Cllr G Beaven, Cllr Mr D Jones
In attendance: Cllr Cox, Mr P Harwood from Avison Young, Jon Richmond from Green Parks, 24 members of the public.

1. Welcome and participation rules for the meeting.

Cllr Jevons welcomed those present and explained that the rules for participation in a normal Council Meeting would apply. He explained that the purpose of the meeting was for the Council to decide how it should respond to the re-consultation of the Tan Troed planning application. But before this members of the public could express views on the application and where appropriate pose questions to the applicant's representatives from Avison Young and Green Parks. He would then ask Cllr Beaven to review the application from the Council's viewpoint.

2. Apologies for absence: Cllr S Bailey, Cllr Mr C Preece, Cllr Helen Quarrell, Hannah Davies (Clerk)

3. Declaration of Interest for agenda items as per Members' Code of Conduct: None

4. Consideration of the applications, following members having viewed it online prior to the meeting: -

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The change of use of existing leisure and overnight camping site at Tan Troed, and removal of existing buildings, permanent pitches and hard standing, to create a holiday lodge park comprising 40 lodges, with associated amenity buildings, infrastructure, and landscaping. Tan Troed Adventure Centre Llangorse Brecon LD3 7UF.

The following matters were raised during the period when members of the public were invited to express views.

A resident enquired about the Highways Authority's conclusions about the adequacy of the local road that provides access to the site. In response it was explained that for the earlier consultation late last year a key consideration was the fallback position which is what can be done on the site within the existing approvals that were granted when PGL operated the site. For the earlier consultation the fallback was considered to be 258 tents with 516 occupants and the Highways Authority concluded that they would not oppose the application as the existing approval could generate much more traffic on the access road than the then proposed 48 lodges. For the current re-consultation the fall back has been reassessed by the NPA to be 70 tents with 200 occupants and the number of lodges has been reduced to 40. The Highways Authority will need to take these changes into account in their response which is awaited.

A resident asked whether there would be sufficient parking on the site as there is already a severe parking problem in Llangors village. In response it was explained that the number of lodges on the site would now be 40 which was much lower than the 48 originally proposed. The site layout has also been adjusted to allow more on-site parking which is distributed to individual lodges with a few spaces more at the check-in to provide 66 spaces in total. The resident then pointed out that most of the site's employees would travel in by car from the local area and it was not apparent from these figures that there would be adequate parking for them on the site. Avison Young also suggested that

UK Green Parks would seek to employ local people who could access the site on foot from the village.

In response to a question about the number of jobs that would be created by the application it was explained that there would be a nett increase of 5.5 full time equivalent jobs compared to the the number employed by PGL in the past. This means the current proposal will directly create 8 full-time and 20 part time permanent jobs whereas the in the past the jobs on site would have been seasonal employment only. In addition it is predicted that a further 68 full time equivalent jobs would be indirectly created by expenditure in the local area.

A residents recalled the time when PGL were operating when regularly more than the approved number of children were holidaying on the site with up to 400 on some occasions. However, they arrived at the weekend mainly by coach and throughout the week they either stayed on site or walked to the Royal Oak Camp site. Rather than use modelling to predict what was happening at that time the applicant should ask local residents. In response it was explained that the fallback had been modelling to understand the impact of how the site could be used in the future if the application is refused.

Furthermore Avison Young explained that modelling traffic flows and trips data is based on nationally accepted methodology and the data used by Jubb is based on data that was submitted for the original 48 unit scheme. The data was not queried by the Highway Authority and the first report was consider robust and acceptable by the Highway Authority.

Avison Young also explained that it may be that a prior use could have been a certain manner however the fallback position is about what could be operated under current planning consents. The applicant has done a lot of work with the NPA planners to understand the fall back. Avison Young set out that is not any control on the type of occupant or season as far as planning controls go.

A residents expressed concerns that the foul drains in the village would not be able to cope with the increased flows from the 40 lodges. In response it was explained that in the past the surface rain water also drained into the sites sewage system but with the application the surface water would be separated and drained into a local watercourse. This would mean that the 40 lodges would create much lower flows than before. In response to a query about where evidence could be found that such changes were satisfactory it was explained that all of the utilities such as water, electricity, and highways were formal consultees and their assessment of the application will be published on the NPA website.

A resident also expressed concerns that if this application is approved it will encourage other similar schemes in the area. In response it was explained that setting a precedent is a planning consideration but each application has to be judged on its merits.

Residents asked for more information about the proposed improvements to the access road and in response they were shown plans of where the verges are to be reinforced allowing cars to pass within the current single track section of road. It was also confirmed that all such work would be carried out to standards set by the Highways Authority and by a contractor approved by the Authority.

A resident was concerned that that local people will suffer as the new development would undercut local Airbnb rates. In response it was explained that the application would aim to tap into a different holiday market and the rates were unlikely to be comparable. It was also confirmed that dogs will be

allowed on the new development. Avison Young asked residents to note that unfortunately there is not any planning policy that protects Airbnb but there is policy protecting housing and this scheme would ease the burden on second home ownership.

The recurring concern was that the access road is not suitable for the high levels of traffic that would use the new development. It was felt that many of the occupants would travel away from the site by car to visit other parts of the national park whereas the modelling predicted the highest traffic levels around lunchtime. There is also concerns that the frequent use of this road by local pony trekking centres and by large farm machinery has been recognised. In response it was explained that the modelling used a well-established technique based on what occurs at similar existing developments. This shows that holiday makers tend to move away in late morning and return in the late afternoon. The new foot path from the site to the village will help to reduce local travel. This path will join an existing public right of way which will be improved.

Avison Young explained that the Transport Statement shows traffic flows consistent with this type of leisure accommodation (i.e. there would not be peaks in traffic in the morning commute hours as typical of other types of residential use). Instead traffic would be dispersed across the day to form a more gradual arrival / departure profile with the highest hour being between 12:00-13:00.

A resident had compared with predicted economic benefits from the development with similar information for the the National Park as a whole. This revealed that the new development would generate around 10% of the total for the national park which they did not find believable.

A resident suggested that as recompense for the likely disturbance from the new development the applicant might allow the part of the site not used for the lodges should provide benefits for local people such as sports facilities or even for affordable housing. In response it was explained that the concept had already been accepted with the offer that the Base Camp Site could be used for local activities and Avison Young agreed that the spare land could also be used as a football pitch.

Again a resident recalled that when PGL operated the site all the activities were closely supervised and noise and general disturbance was kept to an acceptable level. As noise travels more easily in rural areas those who live in the immediate area are very concerned that the new development will be much noisier than before. In response it was explained that there would be site rules and the warden would ensure that these were followed as excessive noise would also disturb other holiday makers on the site let alone the neighbours. It was also explained that the additional landscaping could assist with noise attenuation.

In response to a question about the hot tubs mentioned in the application documentation it was stated that the Utilities Statement assessed a worse-case scenario which included a potential use of hot tubs but not a concrete intention. If implemented hot tubs would be managed by the site's operations team and would possibly include the use of holding tanks if required to smooth changeover demands.

A resident expressed concern that the positive benefits from the application were not being given full consideration. The increased levels of demand would be of great benefit to the local pubs and the community shop which all currently suffered during the long winter season. The extra jobs would be very valuable to local people who find permanent employment difficult to find.

As the Community Councillor who oversees and is representative for planning issues on Llangors Community Council Cllr Beaven then addressed the meeting.

He reminded everyone that the proposed development of the Tan Troed site has undergone several stages of consultation and the Council made a comprehensive responses to the formal consultation that was completed at the end of last year. He considered most of the issues raised in this earlier response would need to be covered again so that the Council's response to the re-consultation was a standalone document. He also urged the residents to make their own responses to the re-consultation as their views on specific matters could have more impact than the Council's submission which will always need to take a balanced view across all aspects of the application.

Cllr Beaven explained that the main amendment to the application is the reduction to the number of lodges from 48 to 40 and the revised site layout that shows the reduction to the density of occupation. However the supporting documentation also reveals a significant change of intention with regard to local services because whereas previously the application stressed that visitors to the site would be encouraged to use the local public houses, shop and café the site is now to become more self-supporting with the on-site restaurant limiting the strain on the existing provisions in the local community. This change is probably a reaction to the concerns about the lack of parking in Llangors village. Although there is now no mention of an on-site kiosk it was confirmed that this facility is being retained. The economic analysis that has been provided to support the application shows that the predicted expenditure with local businesses is reduced by 25% which will be attributable to the reduced number of bed spaces. Avison Young explained that the bedspace has reduced by 25% as a result of the reduction of 8 units.

Cllr Beaven explained that the application documents state that the NPA has received legal advice in relation to the fallback position which would indicate a previous approved camping use in the order of 70 tents/200 people. Also although this is well below the previously claimed fallback of 258 tents/516 people the NPA is prepared to weigh in the balance the new fallback position as broadly equivalent to the current proposal in terms of its impacts on landscape, highways and ecological aspects.

In its previous submission the Council pointed out that the application was claiming that the award of Certificate of Lawfulness of Existing Use in 2020 allowed unrestricted use for assembly and leisure and consequently an occupancy condition could not be used to restrict the use of the site to certain periods throughout the year. However as tented accommodation was being considered when the certificate was awarded it is not obvious to the Council that an absence of time restrictions can be read across to allow whole year occupation of the now proposed lodge style accommodation. The amended application does not mention whether the NPA's legal advice has covered this matter.

The Llangors residents are quite tolerant of the influx of holiday makers but welcome the respite provided by the locally respected and well-established closed season. For many the prospect of whole year occupation of Tan Troed is unwelcomed as it will represent an intrusion into the much needed winter breathing space. The Council has expressed reservations over whole year occupancy because it believes that on balance the adverse impact on the local population will outweigh the likely economic benefits.

Also in its previous submission the Council expressed concerns about the potential for development under the Class D2 Certificate of Lawfulness beyond the red area on the site plan. This matter may now have been cleared up by NPA's legal advice but to be certain the Council believes that should permission be granted for the lodges there should be conditions to prevent additional tented accommodation being installed on other parts of the total site.

Cllr Beaven explained that the Council previously recognised that the volume of foul waste discharged from the site would now be better controlled as there will be a separate system for the discharge of surface water. However concerns remain whether the 24 hour emergency storage capacity of the new foul water system will be adequate as it will be sized only for the weighted occupancy of the 40 lodges of 120 people and not the maximum figure of 158 people.

A related matter is revealed by the not previously seen Utilities Statement which states that water demand for the site will include the 48 No. hot tubs (presumably now 40) which will be required to be changed-over on a regular basis. However, the confirmation given earlier in the meeting that hot tubs were an early assumption for planning the sites capacities but they would not be proceeded with was noted.

The Council has previously recognised that the site surface water will be attenuated by a number of measures with collected flows routed through holding ponds before discharge at a controlled rate of 6.8 l/s into a nearby water course. However, there still does not appear to have been adequate consideration of the impact of the additional flow in this water course that is also connected to a number existing ponds which should they be overtopped will potentially threaten flooding of several village properties. The owners of the ponds in question were able to confirm that the matter had been discussed with the applicant and the point at which the discharge enters the watercourse will now be moved to avoid the potential for flooding the ponds. The plans in the application have not be updated to show this revised layout. UK Green Parks and Avison Young discussed this with the owner at the end of the meeting.

Cllr Beaven further explained that exceedance events are now a more common occurrence and in this respect the application documents appear to be inconsistent and require clarification. In particular the exceedance flow analysis plan shows that the rate of outflow to the nearby watercourse remains controlled to 6.8 l/s during an exceedance event whereas within the text of the Drainage Strategy document it states that there will be exceedance pipes that bypass the proposed hydrobrake to avoid overflowing the site's holding ponds.

Cllr Beaven referred again to the statement that the NPA is prepared to weigh in the balance the fallback position as broadly equivalent to the current proposal in terms of its impacts on highways. However as pointed out by a resident with respect to highways the proposed fallback position envisages a pattern of site use that does not resemble the actual site use at the time of the award of the legal use certificate. In the application the fall back assumes that the 70 tents will be occupied by families travelling by car whereas the site previously provided activity holidays for school children who commonly arrived in a small number of coaches and spent the whole period of stay on the site or the on the nearby Royal Oak Camp site and they walked between these locations. Consequently although the fallback may be useful for planning purposes it does not provide a meaningful representation of the level of traffic that the access road has accommodated in the past.

In this vein it seems likely that the amended application still under predicts the traffic levels on the single track road that serves the site. As previously pointed out the proposed development has few on-site attractions and although some of the guests may walk or cycle in the local area a large proportion will travel by car to the key National Park attractions or further beyond. In this respect the Tourism Assessment has identified 38 tourist attractions and activities that are local to the site but although most could be accessed by cycling very few were within a reasonable walking distance and also that the site occupants are likely to generate significant levels of expenditure in the wider National Park.

Consequently in addition to the site turnover it is reasonable to expect that a high proportion of lodge occupants will travel off the site by car for day visits to the National Park hotspot as well as the local attractions and activities. However the table of predicted trip rates for the 40 lodges gives only 9 departures before 11am with a nett exodus from the site of only 5 vehicles. There is also no evidence to indicate whether the frequent use of this road by local pony trekking centres and by large farm machinery has been considered.

Avison Young did make the point that there is good footpath connections however a fait accompli exists for the applicant as, on one hand, residents are objecting on the basis of too much traffic but on the other are also objecting on the basis of noise amenity from the new footpath connection.

Cllr Beaven explained that the issues that he had described should be taken into account but equally important the proposal would bring significant benefits to the local area and to the National Park both in terms of the high levels of direct and indirect expenditure by those occupying the lodges and the 28 full time and part time jobs on the site itself.

In its response to the re-consultation the Council also needed to take account of the meetings attended by local residents during the earlier consultations and this evenings meeting. The majority of views expressed at these meetings have tended to focus on local concerns whereas the Council is aware that a significant proportion of residents have more positive views believing that the potential benefits will outweigh the adverse implications.

When the Council considered these matters previously it concluded that although there were many benefits the level of concern prevented it from supporting the application. After due consideration of the all the issues raised by the amended application the Council decided that it would continue not to support the application.

Cllr Beaven was asked to respond to the re-consultation advising the Authority of the Council's decision with the reasons for this position. The draft submission that had been circulated prior to the meeting would require some changes but in general it would be suitable for this purpose.

5. Consider any other planning applications received.

None

There being no other business the meeting closed at 8.45 pm.