

Greenmoor Nurseries, St Brides, Wentloog, Newport, NP10 8SQ

Erection of a rural enterprise dwelling associated with the existing dog kennels and wider enterprise at Greenmoor Nurseries, St Brides

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1. Introduction

Background

- 1.1. This Planning Statement has been prepared in support of a full planning application, submitted on behalf of Ms Helen Thomas, in relation to the following development proposal, located at Greenmoor Nurseries, St Brides:

Erection of a rural enterprise dwelling associated with the existing dog kennels and wider enterprise at Greenmoor Nurseries, St Brides

Information Submitted in Support of the Application

- 1.2. The following information has been prepared in support of the planning application:

Document	Author
Application Forms	Geraint John Planning
Planning, Design & Access Statement	Geraint John Planning
Green Infrastructure Statement	Geraint John Planning
Plans & Drawings	Gerald Blain Associates
Rural Enterprise Dwelling Appraisal	Landsker Business Solutions
Ecology	Abbey Sanders Ecology
FCA	JBA Consulting

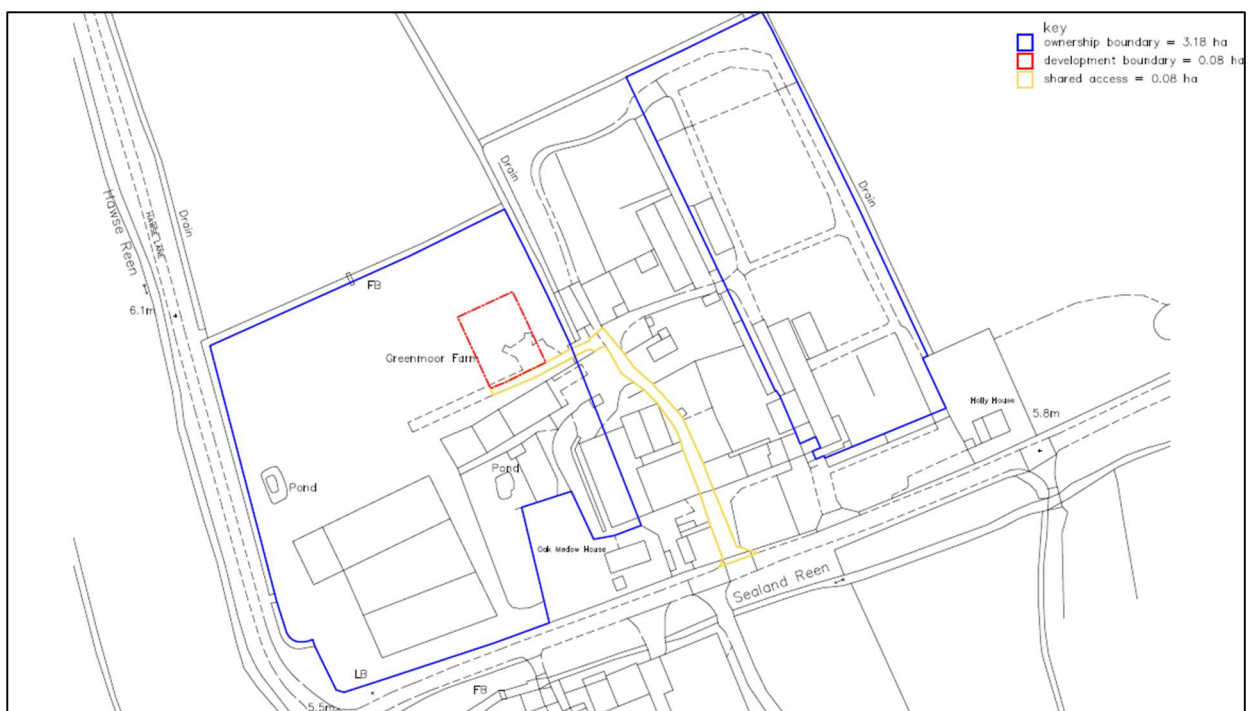
Purpose and Structure of this Statement

- 1.3. This Statement outlines the context within which the application is made and provides a detailed examination of the main planning considerations raised by the proposals. The Statement also sets out reasoned justification in support of the proposed development. The statement is structured as follows:
- **Section 2** provides a description of the characteristics of the site and surrounding area, and details regarding the planning history associated with the site;
 - **Section 3** provides details of the development proposals and design objectives;
 - **Section 4** outlines the relevant planning policy framework in relation to the site and the development;
 - **Section 5** analyses the key planning considerations arising from the proposed development (considering the planning policy context); and
 - **Section 6** sets out a summary and our conclusions.

2. Site and Surroundings

Background

- 2.1. The application site consists of an area of scrub land located directly adjacent to (north of) the existing kennels building / operation. The proposed development site and kennels building are separated by a farm track leading into the paddocks to the west of the farm building complex.
- 2.2. The site represents a generally flat parcel of land that has historically been used for the storage of farm machinery and other equipment associated with the wider enterprise. An extract of the site location plan can be seen below for reference.

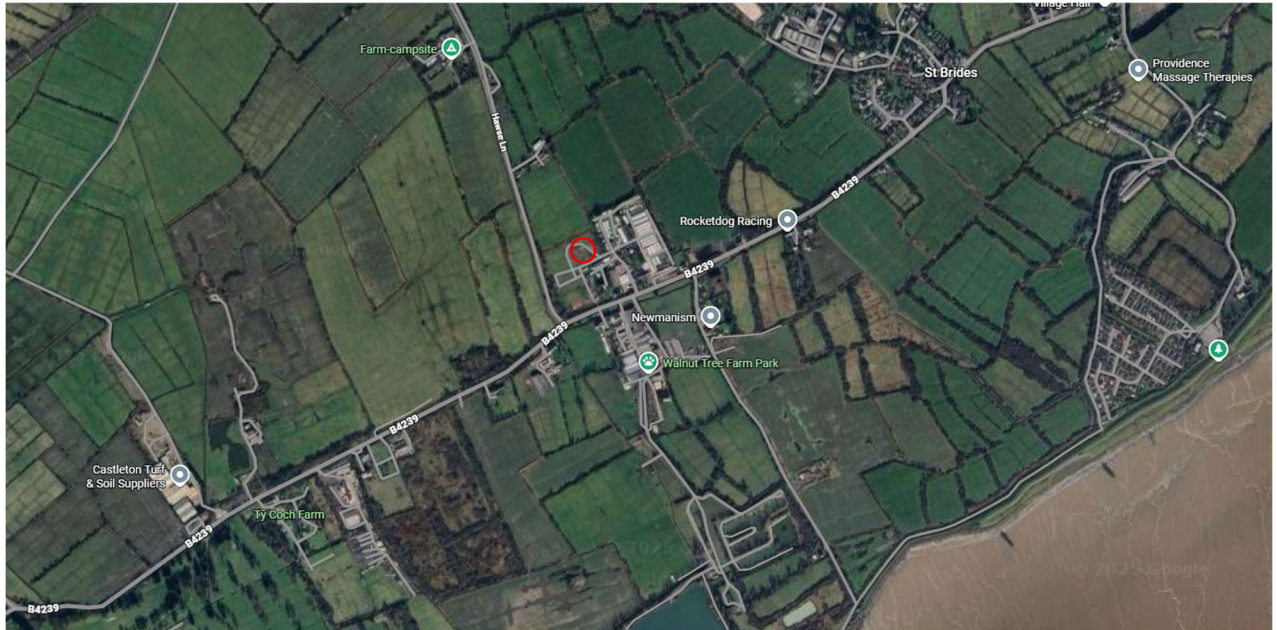


Extract of Site Location Plan (site location in red, wider ownership in blue, and shared access in yellow)

- 2.3. The application site extends to approximately 0.08 hectares, and is located within the administrative boundary of Newport City Council, within the electoral ward of Tredegar Park and Marshfield.

Surroundings

- 2.4. The site is located west of the hamlet of St Brides, and is surrounded by predominately agricultural fields, as well as a handful of rural enterprises and residential dwellings (as depicted by the wider aerial view extract provided overleaf).



The site in a wider context (approx. site location outlined in red)

2.5. In terms of the immediate surrounds, the site is located adjacent to the following:

- To the North and West is farmland associated with the applicant's family farm / wider enterprise;
- To the East is a large hedge / tree line which surrounds the farmyard / storage enclosure; and
- To the South is a private track leading into the farmland and the kennels (the subject to this application).

Access

2.6. The primary access point for the site is located off the B4239. The site benefits from private entrance gates that are set back from the adopted highway. An image of the existing access arrangements has been extracted below for reference.



Site access off B4239

- 2.7. The site's location along the B4239 provides access to Cardiff (to the west) and Newport (to the east) respectively. The site's location and ease of access to / from the M4, allows for the site to attract clients / dog owners who are leaving or coming into Wales to fly / go on holiday.

Planning History

- 2.8. A planning history search of the site has been undertaken using the Council's online Planning Portal. The relevant Planning Applications have been extracted into the below table for reference.

Application Reference	Address	Proposal	Date of Decision	Decision
The Site				
CAS-03729-H9CON5	Greenmoor Farm, Greenmoor Nurseries, Coast Road, St Brides Wentlooge, Newport, NP10 8SQ	Erection of Rural Enterprise Dwelling Associated with the Existing Dog Kennels	Dismissed	06/03/2025
22/1222	Greenmoor Farm, Greenmoor Nurseries Coast Road St Brides Wentlooge Newport NP10 8SQ	Erection of Rural Enterprise Dwelling Associated with the Existing Dog Kennels	Refused	23/05/2024
Wider Enterprise				
24/0597	Greenmoor Farm, Greenmoor Nurseries Coast Road St Brides Wentlooge Newport NP10 8SQ	Retrospective Application for the Cattery Building to the Existing Kennels (Resubmission Following Refusal Of 23/0320)	Refused	19/12/2024
23/0320	Greenmoor Farm, Greenmoor Nurseries Coast Road St Brides Wentlooge Newport NP10 8SQ	Construct Building to Create Cattery Ancillary to the Existing Dog Kennels (Retrospective)	Refused	14/12/2023
12/1058	Coast Road Newport NP10 8SQ	Construction of Dog Kennels Building	Approved	04/04/2013
04/0570	Land Adjacent To Greenmoor Farm St Brides Wentlooge Newport	Retention of Dwelling for Agricultural Worker	Approved	11/01/2006
99/0373	Greenmoor Farm (Land At) St Brides Wentlooge Newport	Erection of Agricultural Workers Dwelling	Refused	08/09/1999
98/0646	Greenmoor Farm (Land At) St Brides Wentlooge Newport	Erection of One Two Storey Dwelling with Associated Works to Replace Partly Constructed Dwelling	Refused	11/02/1999

Surrounding Area				
23/1058	Llanfair Farm Church Lane Marshfield Cardiff CF3 2UF	Outline Application for a Rural Enterprise Worker's Dwelling (All Matters Reserved)	Granted with Conditions	3/12/2024

Planning History Table

2.9. As outlined above, the site has previously been the subject of a Full Planning Application and a subsequent Appeal relating to the proposed *“Erection of a Rural Enterprise Dwelling Associated with the Existing Dog Kennels.”* These applications are particularly relevant to the current proposals, and are therefore examined in detail within Appendix A (Summary of Previous Application and Appeal), whilst the issues raised at the application and appeal stages have been addressed in detail by new supporting information and evidence, and in Section 5 (Material Considerations) of this statement.

3. Development Proposals

- 3.1. Chapter 3 of PPW12 considers the importance of Good Design in Making Better Places. Accordingly, paragraph 3.3 states that *“Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places.”*
- 3.2. Similarly, paragraph 3.4 notes how *“Design is an inclusive process, which can raise public aspirations, reinforce civic pride and create a sense of place and help shape its future. For those proposing new development, early engagement can help to secure public acceptance of new development. Meeting the objectives of good design should be the aim of all those involved in the development process and applied to all development proposals, at all scales.”*
- 3.3. Paragraph 3.17 of PPW12 provides guidance on Design and Access Statements and notes how this type of document *“communicates what development is proposed, demonstrates the design process that has been undertaken and explains how the objectives of good design and placemaking have been considered from the outset of the development process. In preparing design and access statements, applicants should take an integrated and inclusive approach to sustainable design, proportionate to the scale and type of development proposal.”*
- 3.4. This chapter provides a description of the development proposals.
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Background

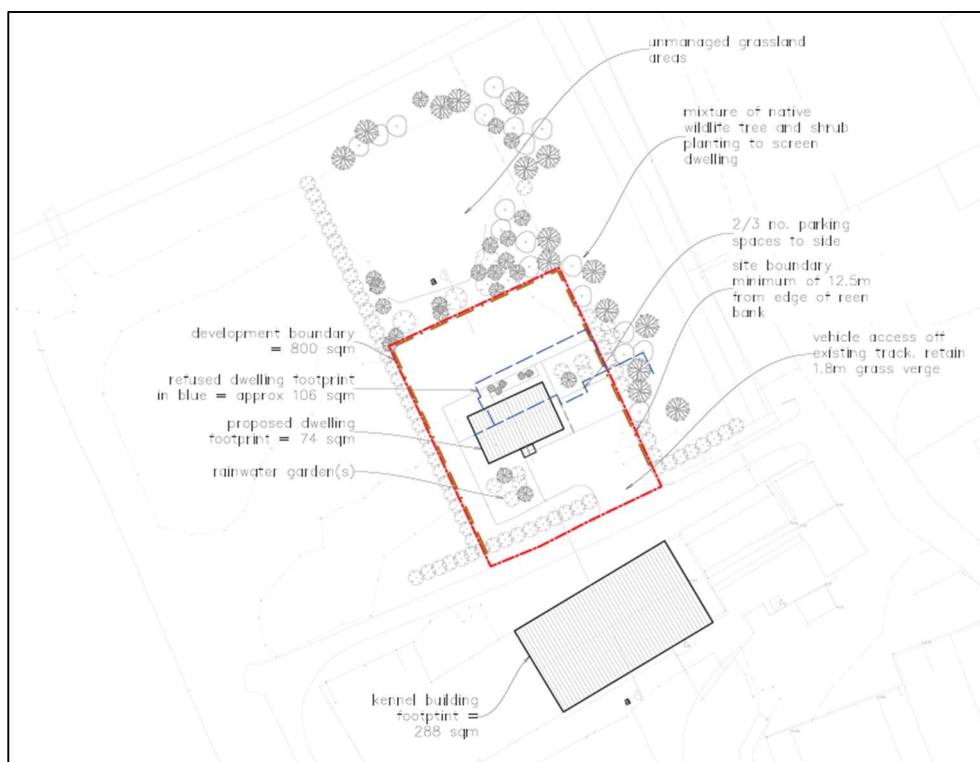
- 3.5. The proposals are for a full planning application for a rural enterprise dwelling at Greenmoor Farm Nurseries. The applicant and enterprise owner, Ms Helen Thomas, operates the rural enterprise (Home and Away Kennels) which currently consists of:
- A dog kennels;
 - A cattery; and
 - Office and staff area.
- 3.6. The rural enterprise at Home and Away Kennels forms part of, and is located within, the wider enterprise at Greenmoor Farm Nurseries.
- 3.7. As a result of the applicant’s licenses and constant required presence on the site, this application seeks permission for a rural enterprise dwelling. Whilst the applicant currently lives onsite (outside of their ownership), they do not have their own permanent residences.
- 3.8. In order to evidence the need for this rural enterprise dwelling, and to highlight that the proposal satisfies all the TAN 6 tests for a Rural Enterprise Dwelling, a Rural Enterprise Dwelling Appraisal has been prepared by Landsker Business Solutions and is submitted with this application. This should be read in conjunction with this statement, and given considerable weight.
- 3.9. The Applicant’s ability to fully satisfy all the TAN 6 tests for a Rural Enterprise Dwelling (as confirmed by the Rural Enterprise Appraisal), is also fully justified in the Material Consideration Section of this statement.

The Proposals

3.10. This application seeks the approval of Full Planning Permission for the:

'Erection of a Rural Enterprise Dwelling Associated with the Existing Dog Kennels and Wider Enterprise at Greenmoor Farm, St Brides'

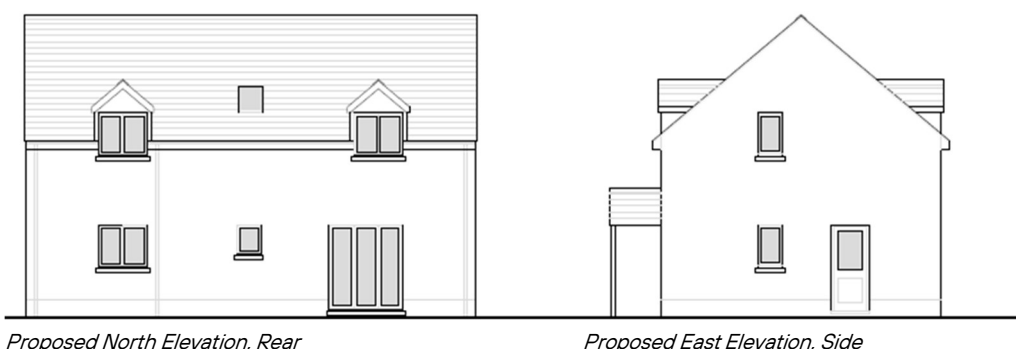
3.11. The proposal seeks planning permission for the construction of a two-storey rural enterprise dwelling (and associated works) for the purpose of providing essential accommodation for the owner of Home and Away Kennels – which is necessary for the enhanced operation of the existing enterprise. The proposed block plan has been extracted below for reference:



Proposed Block Plan

3.12. As per the above block plan, the proposed development site (including the proposed dwelling) is outlined in red to the north, whilst the existing kennels (to which this proposal relates) is shown in the adjoining field to the south. The siting of the previously proposed rural enterprise dwelling is outlined in blue for reference.

3.13. The proposed elevations of the rural enterprise dwelling are shown below:

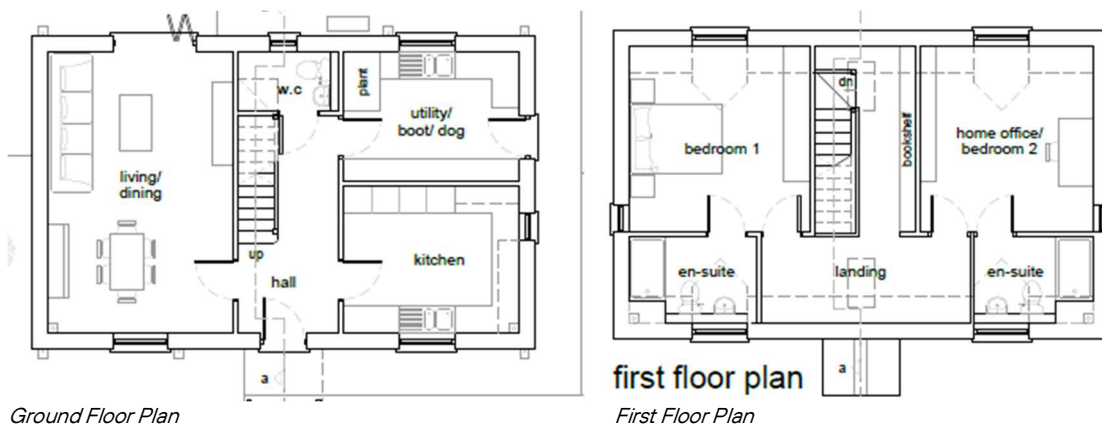


Proposed North Elevation, Rear

Proposed East Elevation, Side



3.14. The proposed floor plans of the rural enterprise dwelling are shown below for reference.



3.15. As demonstrated above, the proposal comprises a modest two-storey development. The accommodation schedule is shown below for reference:

Floor	Schedule	Size
Ground Floor	<ul style="list-style-type: none"> Entrance Hall; Kitchen; Living / Dining Room; Utility / Boot / Dog Room; and WC. 	37 m ²
First Floor	<ul style="list-style-type: none"> Bedroom 1 (En-suite); Home Office / Bedroom 2 (En-suite); and Landing. 	37 m ²

3.16. As per the above proposed plans, it is considered that the proposal has been designed to complement and enhance the character of the surrounding area in terms of siting, appearance, integration, scale, height, massing and design detailing. The proposals have been carefully considered to ensure the entirety of the space proposed is essential to operation and function of the rural enterprise. This is discussed in more detail within Section 5 (Material Considerations) of this statement.

Access, Highways and Parking

3.17. As shown on the proposed Block Plan, access into the site is to be created onto / via the existing unnamed track that runs through the wider enterprise.

3.18. In terms of form, scale and access arrangements, the proposal is reflective of the access of the existing rural enterprise. The access has appropriate visibility splays, and turning space within the site. Furthermore, as the track is a private road with low level traffic movements, it is not envisaged that any issues will arise from

the proposed development. Indeed the proposals, by providing a residential unit on site, may reduce traffic movements to and from the site.

4. Planning Policy Context

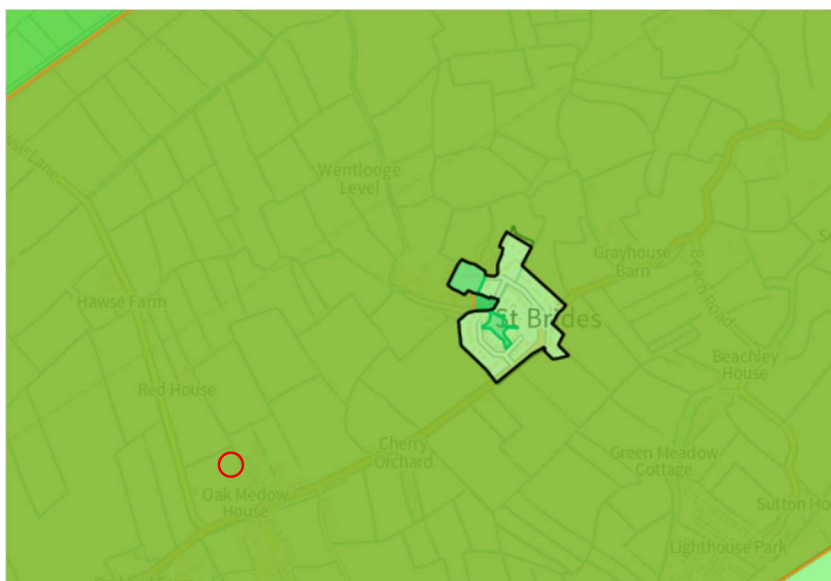
Background

- 4.1. A review of the planning policy context associated with the site and proposed development (at local level) which are of relevance to the determination of the application are outlined below, with the relevant national planning policies provided within 'Appendix B – National Planning Policies'.
- 4.2. A detailed assessment of how the proposed development accords with these policies is provided in Section 5 (Material Considerations) of this Statement.

Local Planning Policy

- 4.3. The current (adopted) Development Plan for Newport City Council consists of the following:
 - Newport Local Development Plan (2011-2026).
- 4.4. The associated LDP Proposals and Constraints Maps have been extracted below for reference.

Adopted LDP Proposals Map



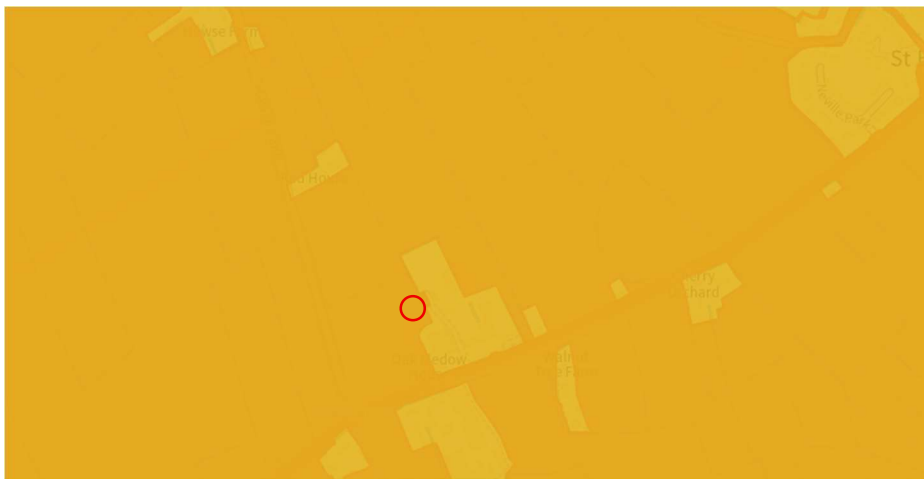
Extract of LDP Proposals Map (approximate site location in red)

Key					
	Green Wedge		Archaeologically Sensitive Area		Village Boundaries
	Countryside		Special Landscape Area		Underdeveloped Coastal Zone




4.5. In light of the above LDP proposals map, the site is located:

- Within a Green Wedge;
- Within the Countryside;
- Within a Special Landscape Area;
- Within an Archaeologically Sensitive Area;
- Within the Underdeveloped Coastal Zone; and
- Outside of, but in proximity to, the village boundary of St Brides.

Adopted LDP Constraints Map



Extract of LDP Constraints Map (approximate site location in red)

Key	
	Site of Specific Scientific Interest
	TAN 15 Zone C1
	Landscape of Outstanding Historic Interest

4.6. As demonstrated by the above LDP constraints map, the site is located:

- Within a SSSI;
- Within a TAN 15 Zone C1; and
- Within a Landscape of Outstanding Historic Interest.

4.7. In light of the above, and considering the context of this proposal, it is considered that the Local Plan Policies of greatest relevance to the proposed development are as follows:

- **GP6 – Quality of Design:** Requires high-quality, sustainable design that respects local character;
- **GP2 – General Amenity:** Protects the amenity of existing and future residents from adverse impacts;
- **GP4 – Highways and Accessibility:** Ensures developments provide safe, accessible, and efficient transport connections;
- **GP5 – Natural Environment:** Safeguards biodiversity, habitats, and landscape features from harmful development;
- **H2 – Housing Standards:** Mandates adequate space, quality, and environmental standards in new housing;
- **CE4 – Historic Landscapes:** Protects nationally important historic landscapes from inappropriate change;
- **CE6 – Archaeologically Sensitive Area:** Requires assessment and protection of archaeological assets in sensitive zones;
- **CE9 – Coastal Zone:** Restricts harmful development in coastal areas to protect habitats and manage risks;

- **SP1 – Sustainability:** Promotes sustainable development balancing social, economic, and environmental needs;
- **SP3 – Flood Risk:** Directs development away from areas of high flood risk;
- **SP5 – Countryside:** Protects rural areas from inappropriate development while supporting rural communities;
- **SP7(i) – Green Wedge:** Prevents urban sprawl by maintaining open land between settlements;
- **SP8(iii) – Special Landscape Area:** Conserves locally important landscapes for their scenic and cultural value;
- **SP9 – Conservation of Natural, Historic and Built Environment:** Safeguards Newport's heritage and environmental assets;
- **CE10 – Underdeveloped Coastal Zone:** Limits development in undeveloped coastal areas to preserve natural character;
- **T4 – Parking:** Requires adequate, safe, and accessible parking provision in new developments; and
- **W3 – Waste Management Facilities:** Ensures sufficient land and facilities for sustainable waste management.

4.8. The following SPG's are also considered to be of relevance to the proposals:

- New Dwellings (adopted August 2015);
- Trees, Woodland, Hedgerows and Development Sites (adopted January 2017);
- Wildlife and Development (adopted March 2010);
- Parking Standards (adopted August 2015);
- Waste Storage and Collection (adopted January 2020); and
- Archaeology and Archaeologically Sensitive Areas (adopted August 2015).

5. Material Considerations

Key Planning Considerations

- 5.1. In assessing the acceptability of the proposed development, there are a number of key issues that the proposals have considered in order to ensure that the scheme addresses any planning policy compliance or constraints the site may have.
- 5.2. The various material considerations will have an important bearing upon the proposals and detail of the scheme, and its acceptability. These key material considerations are assessed in detail below, and include:
- The Principle of Development & TAN 6 Tests;
 - Design and Residential Amenity;
 - Access & Highways;
 - Flood Risk & Drainage;
 - Ecology and Biodiversity; and
 - Other Material Considerations.
-

Principle of Development

National Planning Policy

- 5.3. Planning Policy Wales Edition 12 (February 2024) provides the overarching policy guidance document for Wales, and sets out the following in respect to Rural Enterprise Dwellings:

"4.2.37 The purpose of 'rural enterprise dwellings' is to enable rural enterprise workers to live at or close to their place of work, including encouraging younger people to manage farm businesses and supporting the diversification of established farms. Rural enterprise dwellings represent one of the few circumstances in which isolated new residential development in the open countryside may be justified."

*"4.2.28 All applications for new rural enterprise dwellings should be carefully examined to ensure that there is a genuine need. It will be important to establish whether the rural enterprise is operating as a business and will continue to operate for a reasonable length of time. **Planning authorities should follow the guidance in Technical Advice Note (TAN) 6: Planning for Sustainable Rural Communities and in the related practice guidance with regard to the requirements for rural enterprise dwelling appraisals.**"*

- 5.4. In light of the above, the principle of development should be based upon, and assessed against, the guidance contained within the key document – TAN 6 'Planning for Sustainable Rural Communities'. As such, the proposals are evaluated in the context of TAN 6 below, and is assessed against its stringent tests.

TAN 6

- 5.5. First and foremost, it should be noted that the Inspector's Report for Appeal reference CAS-03729-H9CON5 states that *"there is no dispute between the parties that the kennels in this case would constitute a rural enterprise for which a rural location is justified in line with Technical Advice Note (TAN) 6: Planning for Sustainable Rural Communities, and I find no reason to disagree."*

- 5.6. Given this finding, it is clear that the fundamental basis and “starting point” in this case is sound and acceptable – that the business and activity to which the proposal relates is a rural enterprise.
- 5.7. The Inspector’s Report continues by setting out and stating that against this background the main issues / considerations for this proposal are as follows:
- *“Whether there is an essential need for a dwelling to accommodate a rural enterprise worker;*
 - *Whether the proposal is inappropriate development in the green wedge and its effect on openness;*
 - *Whether any harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations so as to amount to the very exceptional circumstances necessary to justify the development;*
 - *The effect on the character and appearance of the area;*
 - *Whether the location of the proposal would be acceptable having regard to planning policies relating to flood risk; and*
 - *Whether the proposed means of foul drainage is acceptable, having regard to the site’s location within the Gwent Levels – St Brides Site of Special Scientific Interest (SSSI). ”*
- 5.8. In light of the above, provided this application demonstrates and evidences that the above tests / issues are satisfied, it is considered that the application should be considered favourably. The Rural Enterprise Dwelling Appraisal produced by ‘Landsker Business Solutions’ provides robust evidence (which was not supplied in application ref. 22/1222) as to how and why these tests are satisfied, as well as how the position has positively expanded/progressed in the 2 years since the initial application. This should be read in full, and in conjunction with this statement, to fully appreciate and understand the position.
- 5.9. The following key points have been extracted from the REDA to outline that these tests are satisfied, and all concerns regarding the justification for the dwelling in the previous application have been overcome.

Functional Test

- 5.10. There is both an essential need and regulatory / licensing duty for the principal worker (the Applicant) to be present and able to respond to emergencies at all times. This is not a discretionary or convenience based preference, it is an enforceable regulatory condition that underpins the business’s right to operate.
- 5.11. Under the Animal Welfare Act 2006, the operator has a legal duty to prevent unnecessary suffering. Emergencies such as illness, whelping complications, heat stress, escape attempts, or injury require immediate physical intervention.
- 5.12. Incident logs document multiple cases requiring urgent on-site response, including out of hours veterinary transfers, heating failures, and medical emergencies. Delayed attendance from off-site accommodation would materially increase the risk of harm and breach the operator’s statutory duty of care.
- 5.13. The enterprise is managed and supervised by the principal worker (the Applicant), with daytime assistance from part time staff. Without proximate accommodation, the enterprise would be exposed to operational failure in the event of illness, family emergency, or unavoidable absence. Timesheet evidence shows that supporting staff are not contracted or trained for unsocial hour duties, leaving no alternative coverage in the operator’s absence. The summary of recorded labour inputs can be seen below for reference:

Worker	Role	Hours / Week	Hours / Year (Est.)	Coverage Characteristics
Helen Thomas	Principal Operator / Licence Holder	59.5 hrs +	3,120 hrs	Early morning, late evening, emergency cover
Staff A	Kennel Assistant	20 hrs	1,040 hrs	Daytime only
Staff B	Kennel Assistant	16 hrs	832 hrs	Daytime only
Staff C	Cleaning / Exercise Support	8 hrs	416 hrs	Daytime only
Admin Support	Bookings / Finance	2.5 hrs	130 hrs	Off-site

Total Record Labour: 5,538 Hours Per Annum

- 5.14. The above table demonstrates that Applicant represents 2.52 Full Time Equivalents (FTE) when benchmarked against the standard agricultural baseline of 2,200 hours per FTE. The recorded distribution shows an imbalance, over 56% of total hours are delivered by the principal operator (the Applicant), who alone provides continuous coverage and all emergency response capacity. Supporting staff hours are fragmented across daytime slots only, leaving the enterprise entirely dependent on the principal worker during early, late, and overnight periods.
- 5.15. TAN 6 Paragraph 4.4.1 clarifies that the Functional Test concerns whether a worker must live on-site, not whether the enterprise requires an additional employee. The proposed dwelling therefore does not arise from an expansion in labour demand but from the continuing necessity for the existing, licensed full time worker to reside in immediate proximity to the kennels to meet operational and welfare obligations.
- 5.16. Section 7 of the Rural Enterprise Appraisal (Functional Test) concludes by stating the following:
- "On the basis of the compiled operational and regulatory evidence, including rotas, timesheets, incident logs, bookings data, and other obligations, this assessment finds that the kennel enterprise displays an ongoing operational pattern that necessitates the presence of a resident, full time worker."*
- "The pattern of duties, incident frequency, and welfare risk indicates that the enterprise could not be operated in compliance with its statutory and licensing duties without proximate on-site management."*
- "The wider holding does not contain any existing or available dwelling capable of fulfilling this role. The proposed dwelling is therefore considered to provide a proportionate and policy consistent means of securing the functional integrity and welfare compliance of the existing enterprise."*
- 5.17. In light of the above, and the information provided within the Rural Enterprise Appraisal, it is considered that the functional test of TAN 6 has been satisfied.

Time Test

- 5.18. The purpose of the Time Test is to differentiate between permanent, year-round operational demands and temporary or seasonal needs, ensuring that new dwellings remain tied to essential enterprise functions rather than convenience or preference.
- 5.19. The Applicant is the principal operator and license holder for Home & Away Kennels, responsible for day-to-day management, animal welfare, and regulatory compliance. Documentary evidence confirms the Applicants position as a self-employed full-time enterprise operator whose working hours materially exceed a standard employment threshold.

- 5.20. The man-hour model provided within the Rural Enterprise Appraisal provides an evidence-based quantification of the enterprise's labour demand, applying task time metrics and throughput data derived from live bookings (see overleaf).

Activity / Task	Frequency	Hours / Day	Days / Year	Annual Hours	Source / Note
Feeding, health checks, welfare monitoring	Twice Daily ▾	2	365	548	DEFRA animal welfare standards
Cleaning, sanitation, waste management	Daily ▾	2	365	730	Standard kennel management
Exercise and enrichment	Daily ▾	2	365	730	RSPCA and boarding licence welfare
Customer liaison (drop offs, collections, admin)	Daily ▾	1	365	365	Client management and record keeping
Laundry, bedding and grooming maintenance	Daily ▾	1	365	365	Routine hygiene requirement
Facility upkeep and maintenance	Weekly ▾	4	52	208	Routine maintenance and inspections
Marketing, bookkeeping, compliance	Weekly ▾	3	52	156	Business management function
Emergency call-outs and overnight care	Occasional ▾	1	180	180	Reflects overnight incidents, births, illnesses etc
Seasonal peak (holiday uplift)	Seasonal ▾	2	90	180	High occupancy periods

Baseline Measured Hours

- 5.21. In accordance with accepted rural enterprise appraisal practice (TAN 6 para 4.9.1 and Practice Guidance 5.6), the functional permanence of a rural enterprise worker's role can be demonstrated through comparison with a Standard Man Hours. A full time SMH is conventionally defined as 2,200 hours per annum, equivalent to 275 Standard Man Days of eight hours each (RICS Rural Valuation Practice, 2020).
- 5.22. The baseline model demonstrates that the principal operator (The Applicant) provides approximately 59.5 hours per week, equating to 3,094 hours per year, or 1.41 FTE. This substantially exceeds the recognised full-time threshold and evidences a permanent, year-round operational commitment consistent with TAN 6's "reasonably permanent and full time" requirement.
- 5.23. The quantitative analysis, man hour modelling and conservative stress tests, supported by rotas, bookings, incident logs, travel times and financial projections, demonstrate that:
- The applicant performs a full-time operational role (c. 60 hrs/week minimum);
 - The enterprise has a structural requirement for proximate, immediate attendance (particularly during peak periods and for emergencies); and
 - The need is likely to persist over a reasonable (five year) period.

- 5.24. The analysis indicates that the accommodation requirement arises from the enterprise's continuous operational demands rather than personal preference.
- 5.25. Accordingly, on the balance of the auditable evidence presented in the submitted Rural Enterprise Dwelling Appraisal, the Time Test is seen to be met for the provision of a single, modest rural enterprise worker dwelling at Home & Away Kennels, Greenmoor Nurseries.

Financial Test

- 5.26. TAN 6 requires any rural enterprise seeking a dwelling to be financially sound and demonstrate good prospects of remaining economically sustainable for a reasonable period, typically five years.
- 5.27. The Financial Test therefore requires verifiable evidence that:
1. The enterprise is profitable and financially secure;
 2. It can sustain both normal operations and the costs associated with a dwelling; and
 3. It remains resilient under reasonable downside scenarios.
- 5.28. On review of the financial statements and supporting forecasts (as further demonstrated and expanded upon within the Rural Enterprise Dwelling Appraisal), Home & Away Kennels is financially stable, well managed, and economically sustainable. It demonstrates consistent profitability, healthy liquidity, and the capacity to service both existing operations and the proposed dwelling over the long term.
- 5.29. The business's characteristics reinforce this financial strength:
- Low fixed overheads and modest debt exposure;
 - A repeat and predictable client base providing stable revenues; and
 - Direct owner management ensuring operational efficiency.
- 5.30. Both loan interest and principal repayments are fully modelled within the forecasts. Even after meeting all commitments, the business retains a strong cash position and net profit levels well above typical sustainability thresholds for rural enterprises.
- 5.31. On the balance of verifiable evidence, the enterprise is considered to be financially sound, resilient, and capable of supporting a permanent rural enterprise dwelling without risk to its ongoing viability or the wider holding's integrity.
- 5.32. Given the above, and the findings of the REDA, it is the case that the financial test is met and satisfied.

Other Dwelling Test

- 5.33. As the Rural Enterprise Dwelling Appraisal outlines, there are no other forms of accommodation or dwellings in the vicinity that are suitable and/or available as an alternative to the proposed dwelling at site:
- All on-holding dwellings are occupied and not available;
 - The identified eastern wing is structurally inadequate and uneconomic to convert;
 - The local housing market offers no practical or affordable alternatives; and
 - Labour reorganisation would compromise animal welfare and enterprise resilience.
- 5.34. In light of the above, and as outlined within the Rural Enterprise Dwelling Appraisal, the proposal for a purpose built, modest on-site dwelling is the only reasonable and proportionate means of meeting the established need.

5.35. Given this, the Other Dwelling test is met and satisfied.

Interim Summary

- 5.36. The submitted Rural Enterprise Dwelling Appraisal clearly highlights how the proposal satisfies all the applicable TAN 6 tests, and as such the proposal is acceptable in principle and in detail.
- 5.37. The functional test is satisfied as there is a clear functional need for a worker to be readily available at all times due to the high occupancy rates, and in order to deal with an emergency that would threaten the continued viability and existence of the enterprise without immediate attention. These obligations are personal to the license holder (the Applicant) under the Animal Welfare (Licensing of Activities Involving Animals) (Wales) Regulations 2021, and cannot be delegated to untrained or off-site staff.
- 5.38. The time test is satisfied by labour records, man-hour modelling, and bookings data that confirm the operational requirement is permanent and full time, not seasonal or intermittent. The principal operator (the Applicant) consistently undertakes approximately 60 hours per week, providing early, late, and emergency coverage that part time staff cannot deliver.
- 5.39. The financial test is satisfied by clear evidence of sustainability and resilience. Historic and projected financial data establish that Home & Away Kennels is a financially viable and sustainable enterprise capable of supporting both ongoing operations and the proposed dwelling.
- 5.40. The other dwelling test is satisfied as there are no other forms of accommodation or dwellings in the vicinity that are suitable and/or available as an alternative to the proposed dwelling at site.

Design and Residential Amenity

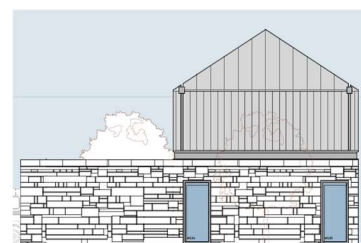
- 5.41. First and foremost, it should be noted that the proposed design has been significantly revised from the proposals put forward as part of the previous application (ref. 22/1222).
- 5.42. The proposed dwelling has a footprint of approximately 74 square metres, representing a reduction of around 30 percent compared with the previously refused size and scale of approximately 106 square metres.
- 5.43. A comparison of the previously refused and now proposed plans can be seen below for reference.



- 5.44. As demonstrated above, there has been a significant reduction in the overall footprint, which ensures that the dwelling is subservient to the adjoining buildings, and is sufficiently proportionate to the physical scale of the kennels – which occupies a footprint of approximately 288 square metres.
- 5.45. The Officer's Report for application ref. 22/1222 sets out that the previously proposed design was *"modest in its footprint when compared to the extent of the proposed curtilage as shown on drawing 1088-26-190 Rev 01. The site layout is logical and regular in providing the vehicle turning and parking to the front elevation and private amenity space to the rear of the dwelling featuring a manicured garden."* Given that the proposals put forward as part of this application have been significantly drawn back from the previous application, it is considered that this assessment is not only maintained, but further enhanced by the even more "modest" design put forward as part of this application.
- 5.46. The Officer's Report to the previous application also states that *"it is noted that the proposed site layout does not include any details of a boundary treatment save for the erection of gates to the vehicle entrance. The purpose of the gates is unclear as the remainder of the site would not be enclosed by an adjoining form of boundary treatment. This is considered to be an odd arrangement."* As demonstrated by the proposed site plan, the boundary wall / gate has been removed from the proposals, and further boundary treatment details have been incorporated into the design proposals, including a mixture of native wildlife tree and shrub planting to assist in providing additional screening, green infrastructure, and biodiversity gain.
- 5.47. The Officer's Report also states that the *"ground floor element extends beyond the width of the first floor element due to the inclusion of an extension to the kitchen/dining area. The width of the ground floor is further extended through the inclusion of a boundary wall which partially extends into the parking area. The design results in a bottom heavy unbalanced appearance. The fenestration placement has not been informed by good design practice to ensure the elevations are symmetrical or feature regular spacing between windows in order to achieve an aesthetically pleasing appearance. The dwelling has clearly been designed from the inside out as confirmed in the supporting statement paragraph 6.6. The inclusion of a chimney added to the extended ground floor has little coherent connection with the overall design save for the use of materials to match that of the ground floor. This disconnect from the design is also considered to be contrived."*
- 5.48. In light of the above, an extensive re-design exercise has been undertaken to ensure that the proposed design is of high quality, and is carefully and sensitively designed. The proposed dwelling adopts a simplistic 2-storey design, with a gable roof, two dormers on either side (north and south elevations), and a porch on the south (principal) elevation. A comparison between the previously refused and now proposed plans can be seen below for reference.



Previously Proposed North Elevation, Rear



Previously Proposed East Elevation, Side



Proposed North Elevation, Rear



Proposed East Elevation, Side



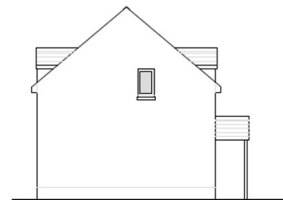
Previously Proposed South Elevation, Front



Previously Proposed West Elevation, Side



Proposed South Elevation, Front



Proposed West Elevation, Side

5.49. Further to the above, TAN 6 (paragraph 4.13.1) requires that dwellings associated with rural enterprises be *"of a size commensurate with the functional requirement of the enterprise and not unreasonably large in relation to it."* The proposal put forward as part of this application represents a modest and clearly functional justification for every internal space within the dwelling, with each of the following serving a specific operational purpose linked directly to the management of the kennels:

- **Living / kitchen / dining area:** a compact open plan layout that provides essential day to day accommodation for a single worker;
- **Utility / boot / dog room:** a multifunctional space providing direct transition between the dwelling and kennels. This room also acts as an overnight close care facility, enabling observation or treatment of dogs requiring regular monitoring, medication, or isolation under the operator's welfare licence;
- **Small home office:** necessary for regulatory record keeping, welfare documentation, and coordination with veterinary and licensing authorities; and
- **Two modest bedrooms:** accommodation for the principal worker and provision for reasonable domestic use or short-term family support, ensuring the dwelling remains practical for long term occupation and business continuity.

5.50. As set out within the Rural Enterprise Dwelling Appraisal, the inclusion of these spaces is entirely operationally justified. There is no surplus space, nor are there any decorative rooms, each room has its own link to the welfare, administrative, or resilience needs of the enterprise. The internal arrangement reflects professional necessity rather than lifestyle aspirations – which is wholly in accordance with the TAN 6 principle of proportionality.

5.51. Furthermore, from a financial perspective, the proposed dwelling is proportionate to the established turnover and profitability of the kennels (see Section 9 of the Rural Enterprise Dwelling Appraisal).

5.52. As demonstrated by the proposed elevations (see above), the proposed dwelling comprises a traditional material palette consistent with the material palette of the existing farm group. The restrained roof pitch and balanced fenestration give the building a distinctly rural appearance and ensure that, within the hierarchy of built form, the new dwelling sits well below the visual prominence of the main farmhouse and the surrounding built form.

5.53. The proposed design is considered to positively attend to the comments raised as part of the previous application (ref. 22/1222) by way of constituting a modest, proportionate, and fully justified rural enterprise

dwelling. Its size, layout, and appearance are directly informed by the functional and welfare requirements of the kennels enterprise and the operational duties of the principal worker.

- 5.54. The light of the above, and the plans and documents submitted in support of this application, it is considered that the proposed development complies with the provisions of LDP Policies GP6 (General Development Principles – Quality of Design) and H2 (Housing Standards), and also complies with the provisions and guidance set out within TAN6. As such, it is considered that the proposed design is acceptable.
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Access & Highways

- 5.55. The proposed dwelling would be served by an existing access from the B4239 highway which leads through the site. This access is the same access that serves the existing kennels enterprise and the farm.
- 5.56. The Officer's Report for application reference 22/1222 sets out that *"the proposed residential use would not result in a significant increase in vehicle movements accessing the B4239, and therefore it is considered that the safe and efficient use of the highway network is retained in accordance with Policy GP4"*. Given the proposals utilise the same access point proposed within the previous application, it is considered that access arrangements remain acceptable.
- 5.57. In terms of parking, the proposals include 2no. bedrooms, and as such, in line with Parking SPG and Policy T4 (Parking), 2 no. off street parking spaces are required within the curtilage of the dwelling. The proposed site plan provides for 2/3 no. parking spaces. As such, the proposed development is demonstrated to be wholly in accordance with Policy T4 and the Parking SPG.
- 5.58. The Officer's Report for application reference 22/1222 did note that cycle storage was not provided for as part of the proposals, albeit that there is sufficient space within the site to cater for this.
- 5.59. In light of the above, it is considered that the proposals are acceptable in terms of access and highways.
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Flood Risk & Drainage

- 5.60. In terms of Flood Risk, JBA were commissioned to undertake a Flood Consequences Assessment for the development in December 2022, where the following conclusion was provided.
- *"The proposed development is a residential dwelling 10m north of the associated kennels, to enable an employee to be onsite 24/7 to ensure the safety, security, and health of the dogs.*
 - *The site has a vulnerability classification of 'Highly Vulnerable' development as defined by TAN-15.*
 - *The proposed development lies within Zone C1 of the Natural Resources Wales (NRW) Development Advice Map (DAM). Zone C1 denotes areas of the floodplain that are developed and are served by significant infrastructure, including flood defences. Development is permitted in Zone C1 subject to application of the Justification Test, and the acceptability of flood consequences.*
 - *The NRW's Flood Risk Assessment Wales maps shows the site has a low risk of tidal flooding and a very low risk of all other sources of flooding.*
 - *The site is protected by the Wentlooge flood defences that have a varying level of 9.36mAOD to 10.01mAOD. 9.36mAOD was used in the assessment to provide conservative values.*
 - *Detailed assessment of tidal flood risk shows that the proposed development site and its access roads are predicted to be flood free in all events except for the 2122 0.1% AEP event where flood depths are expected to be 210mm.*
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- *The proposed development will not increase flood risk to third party land as it is not possible to displace tidal flood water.*
- *This FCA has demonstrated that all aspects of the acceptability criteria set out in TAN-15 have been satisfied. Consequently, we conclude that on the grounds of flood risk, the proposed development meets the requirement set out in TAN-15 and the aims of Planning Policy Wales. "*

5.61. Whilst it is acknowledged and accepted that updates have been made to TAN 15, it is considered that the position in respect to Flood Risk remains as previously concluded, in that all aspects of the acceptability criteria have been / are satisfied.

Ecology and Biodiversity Net Gain

5.62. An Ecological Appraisal was undertaken by Abbey Sanders Ecology in December 2022, and was submitted in support of the previous application (ref. 22/1222).

5.63. The Officer's Report for application ref. 22/1222 sets out that:

"No response has been provided by the Councils Ecology Officer. The conclusions of the submitted Ecology Assessment by Abbey Sanders Ecology confirms that if the proposal is built without mitigation, it will likely adversely impact the habitats and protected species."

5.64. The Officer's Report continues by stating:

"However, the submitted Ecology Assessment goes further setting out that these potential impacts can be mitigated for through the inclusion of mitigation measures during and after construction."

5.65. An updated PEA has been undertaken in December 2025 to support this application. The purpose of this report was to re-confirm the ecological position of the site, both because the previous report had expired and due to the amendments made to the proposals as part of this application.

5.66. The Assessment and Conclusions section of the PEA (Section 4) sets out the following:

*"The proposed development will involve the construction of a new dwelling in the centre of the site with associated garden and vehicle parking. Some tree planting in accordance with the SSSI species list is proposed around the outside of the site, which is now set back by 12.5m from the edge of the adjacent reed bank as requested by NRW. **This is a significant improvement, ecologically, to the previous proposed scheme**, which also now includes less hard surfaces and additional planting of native trees and shrubs and 'unmanaged grassland areas' offering further opportunities for ecological enhancements."*

5.67. The PEA also sets out several mitigation and enhancement measures, which have been discussed within the Green Infrastructure Statement submitted in support of this application. Subject to these measures being implemented, the PEA confirms that the proposals will not have an adverse impact upon the site's designations, and would provide an overall net gain for biodiversity.

5.68. The findings of the PEA are discussed in more detail within the Green Infrastructure Statement submitted in support of this application. As such, this section should be read in conjunction with the Green Infrastructure Statement accordingly.

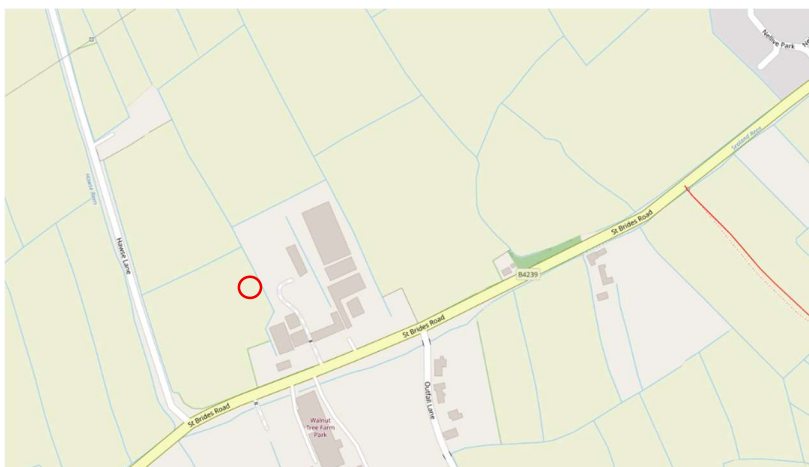
Other Material Considerations

5.69. A number of detailed other material considerations potentially apply to the proposal. These include:

- Public Rights of Way; and
- Archaeology and Heritage.

Public Rights of Way

5.70. As can be seen on the below Public Right of Way Map extract the site is not located adjacent to any PRoW, however, there is a footpath located in proximity to the site to the east.

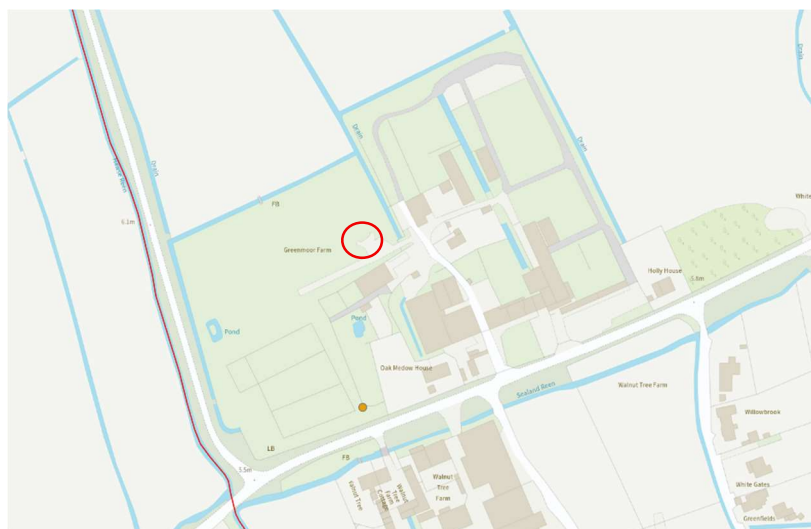


Rights of Way Map (approximate site location in yellow, and wider ownership in blue)

5.71. The proposals will not affect, nor adversely impact on, this route – which is located some distance from the enterprise. As such, it is considered that the PRoW's do not pose a constraint to development.

Archaeology and Heritage

5.72. An online review of the Historic Wales database shows that a single HER (Heneb) designation is located to the south of the site. An extract of the Historic Wales Map can be seen below for reference:



Historic Wales Map (approximate site location in red, and wider ownership in blue)

- 5.73. Given that the proposals represent a rural enterprise dwelling on an established enterprise, it is considered that the Historic Environment does not pose a constraint to development.

Summary

- 5.74. It should be noted that the previous application, and the detailed consideration / evaluation of it confirmed that none of these other material considerations raised issues or concerns in respect to the acceptability of the scheme.
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6. Summary and Conclusions

Summary

- 6.1. This Planning Statement outlines the context within which the full application is made, provides a detailed examination of the main planning considerations raised by the proposals together with a reasoned justification in support of the proposed development, and also sets out how this proposal has built upon, and responded to, the comments received as part of the previous Application (ref. 22/1222) and Appeal (ref. CAS-03729-H9CON5).
- 6.2. The proposed development seeks full planning permission for the *'Erection of a Rural Enterprise Dwelling Associated with the Existing Dog Kennels and Wider Enterprise at Greenmoor Farm, St Brides'*.
- 6.3. Having regard to the above, and in summary, it is considered that the proposed development is considered acceptable and appropriate, in light of the following key factors:
- The proposals for a rural enterprise dwelling fully comply with all the tests outlined in TAN 6 demonstrating an evident need for a dwelling at Home & Away Kennels;
 - The proposal represents a sustainable way of ensuring the ongoing success of Home and Away Kennels, supporting the growth and safeguarding of the rural economy, thus supporting the aspirations of National and Local Planning Policy.
 - The proposals are for a modest dwelling, and the requirement for a dwelling of this size, form and scale is wholly reasonable and justified relative to, and given the profits generated by, the enterprise;
 - The detailed design of the proposals represents a high-quality development that is sensitive in form, scale and mass, reflecting and in-keeping with its existing context;
 - The proposals utilise the existing access, and is acceptable from a highways perspective having no unacceptable impact on highway safety;
 - The proposed dwelling will not have an unacceptable impact in ecological terms;
 - The proposed dwelling will not have an unacceptable impact upon the residential amenity of properties in the local area; and
 - The proposal has no unacceptable impact in terms of Flood Risk, Trees, Historic Environment, and Public Rights of Way.

Conclusion

- 6.4. Having regard to the above material considerations, it is considered that the proposed development represents an appropriate and policy compliant scheme.
- 6.5. Accordingly, it is therefore considered that the proposed development is acceptable, and we would respectfully request that the full application be approved.
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GJP.

**Planning &
Development
Consultancy**