

OBJECTION (Revised June 2022) by Kington Langley Parish Council to PL/2021/06167 – Plough Lane Caravan Site

Kington Langley Parish Council (KLPC) has reviewed the 3 revised plans, dated 4 May, 2022, and the email from the agent, dated 12 August, 2021, but still **OBJECTS** to this planning application. KLPC considers that most of the points detailed in its previous objection remain valid as the only visual change is a reduction from 52 to 44 static holiday dwellings. KLPC concerns have been revised, in light of the new information, and are set out below.

1. **Wiltshire Core Strategy (WCS) CP57** It does not respect the local character and distinctiveness of the area. The design, size, scale and density of the proposed static caravans is out of keeping with the local area. It effectively amounts to 44 two-to-three-bedroom medium sized bungalows on a 1.9-hectare site. The additional 44 homes, a 22% increase in the number of village dwellings, occupying a 1.9ha site amounts to a very substantial development in what is a small village. It does not relate positively to the landscape setting and the existing pattern of development.
2. The size of the static caravans (scaled from the drawing) permitted under N/11/00295/FUL were 11m long x 6m wide. The proposed size of the static caravans of this new application is 15.2m long x 6.2m wide (taken from the Stately Albion drawing), a 41% increase in the size of each unit. The P208C16R REV B layout plan does not have a scale and, with the lack of other information, it can only be assumed that the size of the static caravans remains 15.2m long by 6.2m wide.
3. **WCS CP57** We are told surface mounted concrete rafts will support each lodge. However, they would not portray a high standard of building material or finish that would enhance the landscape setting that is sought by CP57.
4. **NW Local Plan H4** The design and layout of the 44 homes are not complementary to the locality and do not enhance the local distinctiveness or relate positively to the surrounding landscape. It does not enhance the views within the site. The proposal will impact adversely this rural and green setting and does not enhance the setting and character of the small historic village of Kington Langley.
5. **NW Local Plan H4** The proposal sits outside the existing built residential area and is not in keeping with the size and scale of any existing development within the village. If this application was for permanent dwellings, it would be considered to be development in the open countryside and not be considered as infill. There are currently no static caravans on site and much of the 1.9-hectare site is grass and hedgerows.
6. The overdevelopment of the site with its density and spacing of the proposed static units will result in questionable levels of privacy for occupiers as well as impose a loss of amenity to adjacent properties through light and noise pollution and increased traffic. We understand that the site will be lit at night. The village has almost no street lighting by design and street or other on-site lighting will cause light pollution to nearby residents adversely impacting their amenity and the character of the immediate area.
7. There is limited space for parking amongst the 44 static caravans due to their size and density. The revised layout plan, P208C16R REV B, indicates what could be interpreted as 2 parking spaces by each static caravan but these are not specified. There is no information detailing the nature, surface make up for example, of the parking spaces. Also, there is no provision for secure cycle storage.

8. Access to the site is via a single, one-vehicle wide lane with passing places and the exit has limited visibility onto Plough Lane. Also, there is no provision in the proposals to ensure the safety of pedestrians, cyclists or people with disabilities.
9. The proposal would lead to a greater demand for travel. There are limited amenities in Kington Langley for the occupiers to use and the nearest supermarket is Morrisons, 1.6 miles distant. Although there is a local bus service it is minimal and there would be a substantial increase in car use. The proposals make no mention of cycling or walking.
10. The development will have a detrimental impact on the highway with more cars using the already busy Plough Lane and the A350 traffic light-controlled junction. In particular, the safety of vehicles turning right from the A350 into Plough Lane will be worsened given the length of the filter lane.
11. Sewage disposal. The application does not address how the very large increase in sewage from long-term occupation of the static homes will be managed effectively to protect the environment. The agent's email of 21 August, 2021, says it is intended to connect foul drainage to the mains foul drainage. There is no detail to support the feasibility of the existing foul drainage and sewerage system to cope with the additional capacity nor of the proposed layout of foul drainage network of pipes needed. The Construction Management Plan does say the existing network will be upgraded within the park and the areas in which it has rights of way, but does not address how it will upgrade the system where it does not have a right of way. Also, there is a 2.4m difference in height between the North and South of the site (FRA and Drainage Strategy - Plough Ln v2 paragraph 4.1). How will sewage and foul drainage be made to flow uphill?
12. No consideration has been given to the impact on the green space surrounding most of the site, including the ponds that are in the vicinity of the site.
13. **WCS CP41** CP41 requires that all non-residential development be required to achieve the relevant BREEM 'Excellent' standard from 2019. This proposal does not detail measures to reduce energy demand, such as the provision of solar PV panels on South facing roofs.
14. **National Planning Policy Framework (NPPF) Paragraph 8** The proposal does not fulfil the NPPF criteria of achieving a sustainable development that helps to build a strong economy, or supports a strong and healthy community by providing homes to meet the needs of present and future generations, or protects or enhances the natural and built environment.
15. The proposed development will bring no economic benefit to the village or community.
16. There will be no social benefit to the village community from either holiday visits for limited periods or long-term holiday makers. There are no amenities to support longer term residents; there are no shops or pubs in the village and the nearest supermarket is 1.6 miles distant.
17. The proposal does not demonstrate how the supposed benefits would outweigh the adverse impacts.

We also note the following errors or inconsistencies in the application:

- **An incorrect site boundary is shown.** Mr and Mrs Wilding continue to own the access road to the site and the applicant only has permission to use a three-metre wide strip at the entrance off Plough Lane.
- **Existing Tress & Hedges.** Section 10 of the application form indicates that there are no trees or hedges on this site and that there are no trees or hedges on adjoining sites. Both these statements are inaccurate. There are many hedges surrounding the site and on it which currently provide many natural breaks between small numbers of pitches.

- **Inconsistent Employment Statements.** The statements in Sections 18 and 19 of the application form are contradictory. Section 18 states there are 2 full-time employees but section 19 states there are zero full time equivalent employees.

Bearing in mind the 30 plus objections from villagers following the revised application, and the very significant number of original objections, Kington Langley Parish Council asks that the following conditions be appraised and applied should the Planning Authority be minded to grant planning permission:

1. **CONDITION:** All of the static units permitted shall only be used for Holiday Purposes.
REASON: To prevent any permanent residential or any inappropriate use of the site.
2. **CONDITION:** All of the static units permitted shall not be occupied as a person's sole or main place of residence.
REASON: This site is in a position where the local planning authority, having regard to reasonable standards of residential amenity, access and planning policies pertaining to the area, would not permit residential accommodation.
3. **CONDITION:** All of the static units permitted shall not be occupied by the same person or persons more than 28 days within any 36-day period.
REASON: To comply with "Model Standards 1989 – Holiday Caravan Sites and to prevent the site from becoming residential.
4. **CONDITION:** Each static unit is only to be used by its owner, family or friends and no sub-letting by owners is allowed.
REASON: To prevent permanent residential use of the site and to ensure that planning permission conditions and site licence conditions are met and can be enforced.
5. **CONDITION:** The Caravan Site should continue to be operated as "Adults only", and no visiting children should be allowed to stay overnight.
REASON: To prevent whole families with children from living on the site for prolonged periods which would not be appropriate for this site based on village amenities and protecting the amenity of nearby residents.
6. **CONDITION:** The site license conditions should include the details addressing the key issues for the site's operation – including but not limited to (i) how foul sewage is to be dealt with, (ii) detailed site layout including definition of each pitch and provision for more than 44 cars, (iii) details to support disabled owners and visitors.
REASON: To ensure that all aspects of the static caravan site meet the model standards for site conditions.
7. **CONDITION:** Any lighting of the site deemed necessary must be approved in advance to ensure it is the minimum necessary, in terms of brightness and timings, to meet any safety requirements. The height of any lighting sources must be minimised with the light directed downwards only and its spread constrained.
REASON: To avoid light levels materially altering the character of the area as it is an intrinsically dark area (there is no street lighting throughout the village) where new lighting

would be conspicuously out of keeping with the local nocturnal light levels. Also, to avoid any light nuisance affecting the enjoyment and amenity of nearby residents.

8. **CONDITION:** All work on site to be restricted to normal working hours Monday to Friday and Saturday mornings only. No site work on Sundays or Bank Holidays.
REASON: To protect the amenity of neighbours.

Also, Kington Langley Parish Council respectfully requests that it be a consultee to the site licensing conditions should the Planning Authority be minded to grant planning permission as it believes the combination of planning permission and site licensing conditions must consider the above proposed conditions.

We would like to highlight the following points with regard to this proposal:

- (i) **Site Density.** The planning application requests approval for static units which require 5.3 times more area than the maximum size of touring caravan allowed on UK roads (93.17m² versus 17.5m²). This means that the site will be 4.5 times denser without taking into account space for parking of one or two vehicles per pitch. The existing planning permission, for 8 static caravan units of 66m² (11m x 6m), means the new application seeks to increase the size of each of the static units by 41%!
- (ii) **Site Occupation.** The actual occupation of the existing site is considerably less than 60 touring caravans in each and every month, and there are currently only a few caravans being stored on site. Therefore, the proposed change of type of occupier from touring holiday visitors to owner/occupiers of the static units will increase the site occupation levels significantly across more months of the year. Also, these owner/occupiers are likely to bring more than one vehicle with them as their family and friends will be able to use spare bedrooms. The Agent's email of 21 August, 2021, says the current storage on the site of up to 20 caravans adds to the traffic levels but the movement of these stored caravans creates negligible traffic.
- (iii) **Site Layout.** According to the applicant, the "Proposed Site Layout" document is "illustrative" and only the boundaries of the site are fixed. There is no information on the revised site layout plan to indicate otherwise. The applicant stated at a site visit that, in all likelihood, the whole existing park would be cleared of obstructions and all hedges, to permit a new layout and road system to be defined later as part of their license agreement with the council.
- (iv) **Parking.** The revised Site Layout does not state whether it is indicative or final. It shows what may be 2 parking spaces per static caravan. A parking space to the side of each static unit means there is likely to be 3m or less between this car and the next property. There is no provision for the disabled, no provision for electric vehicle charging and no confirmation that each plot owner will only be allowed to bring one vehicle onto the site. Occupancy levels are likely to mean that each unit will need parking for more than one car.
- (v) **Site Style.** The current site is very well landscaped with an abundance of hedges between small groups of pitches. Presently there are different types of "touring caravans" using it at any one time, including tents, small motor homes, larger RVs and larger touring caravans. The new planning application indicates that there will be 44 identical static units at a much higher density than used today. The nature of these static units is that they look (by design) to be much more permanent than touring caravans and are, of course, designed to provide permanent residential use.

(vi) **Green Energy.** No details have been provided concerning the provision of solar PV panels. The inclusion of PV panels on the south facing roofs would reduce the carbon footprint of the dwellings and help protect the environment.

(vii) **Access issues**

- a. The actual occupancy (and hence traffic) changes throughout the year with the current site. The current site was only in use for about 8 to 9 months each year, so the proposed removal of the current 11-month opening restriction will likely create an additional 3-4 months of holiday use. The type of visitor will change resulting in longer and more frequent periods of occupation (as the intention is for the units to be purchased rather than rented as they will be the owners of the static units) which is likely to create more car traffic as more frequent occupancy visits will result.
- b. With each static unit having 2 bedrooms plus a study, purchasers will feel encouraged to bring more than one vehicle to the site with other family members or friends. Although there will be less traffic from cars towing caravans, the village is likely to have to deal with about 200 extra car movements per day along Plough Lane due to the higher occupancy levels.
- c. The static units are 6.13m x 15.2m and will require a large lorry to carry them into the site. The site entrance, which is not owned by the applicant, is adequate for cars but is limited to a 3m wide "right of access" over a single-track gravel path.
- d. The current entrance to the highway (Plough Lane) will not be adequate to allow for large lorries to turn into or exit the site which will be required to deliver the static units.
- e. There are no provisions for safe segregation of pedestrians, cyclists and vehicles in the access to the site. The access is via a single gravel lane with passing places.
- f. There is no provision for disabled access to the site.
- g. The current timing of the traffic lights at the Plough junction to the very fast A350 will not support any increase in traffic into Kington Langley and the site. Indeed, the north-bound right-turn slip road is already dangerously full and this might require re-timing of the lights to prevent a serious traffic hazard when turning right from the A350 into the village and the site overflows the "right turn lane".