

**REPORT OUTLINE FOR AREA PLANNING
COMMITTEES**

Report No.2

Date of Meeting	29th June 2016
Application Number	16/00587/FUL
Site Address	Brokerswood Country Park, Brokerswood Road, Southwick, Wiltshire, BA13 4EH
Proposal	Change of use to locate 90 holiday lodges, 20 touring units and 10 camping pods together with associated infrastructure and LPG storage area (in place of 89 touring unit pitches)
Applicant	Haulfryn Group Ltd
Town/Parish Council	NORTH BRADLEY
Electoral Division	SOUTHWICK - Councillor Horace Prickett
Grid Ref	383935 152434
Type of application	Full Planning
Case Officer	Jemma Foster

Reason for the application being considered by Committee

Councillor Prickett has requested that the application be considered by the Planning Committee if recommended for Approval for the following reasons:

- Scale of development
- Visual impact upon the surrounding area
- Relationship to adjoining properties
- Environmental/highway impact

Councillor Prickett was also of the opinion that the access roads are inadequate.

1. Purpose of Report

To consider the application and recommend approval.

2. Report Summary

The main issues to consider are:

- Principle
- Impact upon the character and appearance of the area
- Impact upon neighbouring amenity
- Access and highways
- Other

3. Site Description

Brokerswood Country Park has been operating as a country park/visitor attraction since 1968 and as a touring caravan and camping park, outdoor pursuits/activity and education centre since 1990's.

The country park is approximately 30 hectares of woodland, parts of which are designated as a County Wildlife Site and Ancient Semi-Natural Woodland. There are no public footpaths running through the site but there are numerous access tracks and paths throughout the woodland. The site subject of this application measures approximately 6.4 hectares so is a relatively small area compared to the entire site.

The existing Holiday and Country Park has a number of number of facilities including a café, shop, information centre, miniature railway, railway shed, activity centre (climbing, archery, canoeing, kayaking), treetop adventure course, play park, barbecue area, former museum building, outdoor education centre (archery, climbing, canoeing), staff accommodation, two washing facility buildings and an activity lake. The touring caravan park consists of 89 pitches, 69 of which have planning permission, 5 are certified location pitches and 15 pitches are used under Permitted Development.

From April 1968 the grounds were open to the general public for 364 days a year until January 2013. After the wettest summer on record in 2012, the park was closed to the general public for the following season to allow the ground and woods to recover. From 2013 onwards, the park has been closed to the general public between November – Easter however the Wiltshire Outdoor Learning team have continued to run all year round activities at the park including corporate programmes for larger groups. The caravan and camping sites have also remained open throughout the year. The site has therefore been in some capacity operating for 12 months of the year since 1968.

The Park has direct access off Brokerswood Road and Fairwood Road.

4. Planning History

A screening opinion has been carried out during the life of this current application and the Local Planning Authority concluded that an EIA was not required.

14/06001/CLE – Stationing of mobile for residential use – Approved 16/10/2014

W/12/01854/S73 – Variation of condition 1 attached to planning permission 98/00464/FUL (No caravan/tent etc to remain over 28 days) – Approved 13/12/12

W/08/01389/FUL – New subterranean, drainage and repositioned sewer tanks – Approved 09/06/08

W/06/00359/FUL – New revised shower facilities – Approved 03/04/06

W/05/02933/FUL – New shower facilities – Approved 16/01/06

W/00/00185/FUL – Landscaped earth bund, erection of boiler house, construction of refuse/recycling point, erection of wooden shed for electricity meters – Approved 13/03/00

W/98/00464/FUL – Caravan park complete with two toilet blocks, sewage disposal unit and disposal tank – Approved 21/05/98

The 1998 application gave permission for a maximum number of caravans/tents/tourers/pitches to not exceed 69 at any one time. It also requested that there shall be no more than 20 pitches of the 69 with a hardstanding base.

The 2012 application lifted the occupation restriction for 28 days which was on the 1998 application. The condition was changed to:

The use of the site for the stationing of touring caravans/tourers/tents shall be used for holiday accommodation only and shall not be occupied as a persons sole or main residence. The owners/operators of the site shall maintain an up to date register of the names of all the occupiers of the caravan/tourers/tents and of their main home addresses and shall make this information available at all reasonable times to the local planning authority.

REASON: The site is in a position where the Local Planning Authority, having regard to the reasonable standards of residential amenity, access and planning policies pertaining to the area, would not permit permanent residential accommodation.

5. The Proposal

The proposal includes replacing the existing 89 pitches with 90 holiday lodges, 10 touring units and 10 camping pods. One of these lodges will replace the existing timber lodge that is currently used for staff accommodation.

Some of the existing facilities will remain such as the reception, shop, café, washing facilities, bio mass boiler and some of the outdoor activity area. However the proposal does see the removal of a large former museum building, large storage building, train station, trains shed and two platform areas alongside the train itself and its associated track. The play park, barbecue area and coach/car parking area are also to be removed.

Additional LPG storage tanks are proposed which will be located on a concrete plinth on the site of an existing timber building which is to be removed. Low level lighting is also proposed. The existing access arrangements will remain which see the entrance on Brokerswood Road and the exit on Fairwood Road.

The proposed holiday park is to be run by a group known as Haulfryn who are renowned for their holiday and residential parks across the country. The proposed

use for this particular site is for holiday homes (not residential homes). This company also has experience of constructing similar developments in areas of woodland across the UK including Finlake near Newton Abbot and the Devon Hills Holiday Village near Paignton.

Amended plans have been received reducing the amount of touring units to 10 (from 20) and the relocation of the lighting bollards. Additional ecology information has also been submitted. As the number of pitches have been reduced and some lodges have been re-located away from neighbouring properties, it was not considered necessary to carry out a further re-consultation process.

6. Planning Policy

The Wiltshire Core Strategy (WCS) was adopted on 20th January 2015 and therefore holds full weight in planning terms. The following Core Policies (CP) are relevant when assessing this application.

CP1 (Settlement strategy), CP2 (Delivery strategy), CP39 (Tourism Development), CP41 (Sustainable construction and low carbon energy), CP50 (Biodiversity and geodiversity), CP51 (Landscape), CP52 (Green Infrastructure), CP57 (Ensuring high quality design and place shaping), CP58 (Ensuring conservation of the historic environment), CP60 (Sustainable Transport), CP61 (Transport and Development), CP64 (Demand Management), CP67 (Flood Risk)

When adopting the WCS, some policies continue in force from the West Wiltshire District Local Plan (1st Alteration) (WWDLP) were saved. Those which are relevant to this application include:

U1a (Foul Drainage/sewerage treatment),

Other

- Leisure and Recreation Development Plan Document
- National Planning Policy Framework 2012
- Planning Practice Guidance 2014
- Wiltshire Car Parking Strategy
- Wiltshire Waste Core Strategy
- Circular 06/2005 – Biodiversity and Geological Conservation
- Planning (Listed Buildings and Conservation Areas) Act 1990
- Town and Country Planning Act (1990)

7. Consultations

North Bradley Parish Council – Object – the roads giving access to the site are totally inadequate for existing traffic let alone the increase traffic that this development would produce

Dilton Marsh Parish Council and Southwick Parish Council – Object for the following reasons

(identical letters):

- There will be significant highway problems due to narrow, single carriageway country lanes with no passing places. There is also a regular presence of farm vehicles, local residential traffic, milk collection and the movement of animals and therefore the proposal will exacerbate the problem
- Proposal fails to comply with CP61, CP39
- The site is an environmentally sensitive area that is ancient woodland with a rich diversity of flora and fauna. The impact would be irreversible
- Increase in noise, light and pollution in an area of tranquillity and calm
- Severe loss of residential amenity
- The proposal does not include retail or leisure facilities making residents have further vehicle movements
- The proposal relates to permanent accommodation (20 year lease) and not holiday accommodation
- No pre-application consultation was carried out

Wiltshire Council Highways Officer – no objection

Wiltshire Council Ecologist – No objection subject to conditions

Wiltshire Council Drainage Officer – Support subject to conditions regarding surface water and foul water discharge

Wiltshire Council Sustainable Transport Officer – 1 covered cycle space should be provided per bedroom and cycle parking for staff should be provided

Wiltshire Council Public Rights of Way Officer – No comment

Wiltshire Council Archaeologist – No objection

Wiltshire Council Urban Designer – Would like the areas of hardstanding to be reduced

Wiltshire Council Arboriculturalist – No objection

Wiltshire Council Public Protection Officer – No objection

Wiltshire Council Conservation Officer – No objections

Natural England – No objection subject to conditions regarding avoidance and mitigation measures, lighting, improvement to existing woodland

Environment Agency – No objection subject to informatives regarding treatment plants, pollution

Wessex Water – No objection subject to Wiltshire Council Drainage Officer comments

Fire and Rescue Service – Building Regulations should be incorporated

Wessex Chamber of Commerce – Support as the application includes investment in ecology and surrounding infrastructure. It provides an opportunity to secure the long term beneficial retention of the ancient woodland. It will generate jobs and potentially provide a significant boost to the local economy with the income that will be generated through the lodges

Forestry Commission – No opinion on the application but the LPA should have regard to points provided by Natural England, the need for a Screening Opinion and paragraph 118 of the NPPF.

Woodland Trust – The trust objects to the proposal on the basis of a considerable loss and damage to the ancient woodland namely Round Wood and High Wood/Hazel Wood.

8. Publicity

The application was advertised by a site notice and neighbour notification letters. The deadline for any correspondence was 25th April 2016:

15 letters of support have been received with the following comments (summarised):

- This is the only way to preserve the ancient woodland
- It will bring much wanted employment for the younger job seekers in the area
- On busy days, the queue of people waiting to get into the site extends out onto local roads which will be removed if this application were to be approved
- Noise will be reduced as people will be in lodges rather than canvas tents where people tend to eat outside
- The proposed development leaves the majority of the woodland and wildlife untouched
- There is no view from the windows of the church and the church does not face the proposed development
- The range and depth of plans is impressive
- Lodges will be a much better view than caravans, tents and will offer better insulation
- There are currently 89 pitches
- The lanes have already coped with high level of traffic with even bigger modes of transport, coaches, caravans etc – so this will be better for the roads.
- Owners of the lodges may want to attend the church which will increase the congregation

- Increased landscaping will protect the church
- Outdoor educational aspect of the business will be increased
- It will support Wiltshire Tourism and be an asset to the Countys economy and local businesses
- The development is sympathetically planned and inkeeping with the surroundings
- I have stayed in similar parks and they are a delightful way to keep people in touch with nature whilst remaining eco friendly
- The park cannot survive in its current form
- The local pubs which have closed down would have benefited from this development and therefore other existing businesses will
- Less caravans and more lodges which are more in-keeping with the area
- Continuity of the managed woodlands
- Reduction in touring pitches will reduce the number of caravans, motor homes and trailers using the local road network
- The woodland will be preserved
- The park could just close which would result in a loss of facilities to all – including our economy
- People can still visit Southwick Country Park, Barton Farm and Longleat
- Longleat blends into the wider countryside and I don't see why that wont happen here
- Higher class accommodation is much more suitable to this area which is in demand
- The park is not a public facility
- As the owners of White Row Farm Shop, the proposal would benefit my business

Approximately 290 letters of objection have been received which made the following comments (summarised). It is important to note that in some cases up to 6 letters have been sent from the same property and some people have sent in multiple letters:

Principle

- Used by the locals and would result in the loss of a public park and a loss to the local community
- Should remain as an asset for community use, education use, children, schools,

families and forest memorials

- Previous permission (W/12/01854/S73) gave permission for 69 touring and camping pitches – not 89 as stated
- The end result will be a high density housing development with over 600 people living within the area
- The lodges are not mobile and are clearly planned for permanent occupancy and therefore are homes/second homes
- There are a lack of facilities in the area to accommodate an increase in residents
- There will be no benefit to the local community or Wiltshire
- The lodges will be sold to individuals who can then live in them permanently or rent them out
- There is no demand for holiday accommodation in this area
- The scale of development is not compatible with the quiet rural nature of the area
- Construction of 600 permanent dwellings is out of proportion to the local village hamlet
- If approved it would set a precedent for other holiday villages

Impact upon character and appearance of the area

- This is an Area of Outstanding Natural Beauty (AONB) and a County Wildlife Site
- Listed Buildings will be impacted upon (especially the tin church)
- Bad for the environment
- Permanent lodges and ancillary buildings will damage the fragile eco foot print of this area
- Out of keeping and encroachment of an ancient woodland environment
- Not enough information has been submitted in the Masterplan
- No mention of how many trees will be lost
- Wooden lodges would be an eyesore
- Drainage on site is poor and prone to flooding
- Ecology report is not credible
- Construction phase will involve destruction of woodland

- The park is currently shut on many occasions to minimise the destruction to the natural habitat
- There is inadequate provision for sewerage treatment, refuse collection and disposal
- It will kill animals and their homes
- It will change the character and appearance of the area to its detriment
- The land to the rear of Brockvere is unused and undeveloped and has only been used for horses – surely it is not permissible to now include this field
- 0.46 ha of woodland will be lost
- The design of the new lodges are not in-keeping with the local character
- Protected species and their habitats need to be protected not disturbed
- Increase in pollution, vibration to the compacted soil
- Footings of the lodges will damage existing important root systems

Neighbouring amenity concerns

- Increase in pollution in noise, dust, light
- The number of people staying will overwhelm the local community
- Increase in lighting from 120 lodges will affect us
- We moved to this area knowing we were living next to a small campsite. The proposal will mean that we will live next door to over 100 transitory neighbours who will be complete strangers that will be replaced every week. The noise from people, cars, dogs etc will be significant
- My son is in a wheelchair and gets taken out for walks on the track and down to Silver Street Lane – if this development goes ahead I will not be able to do this
- Trees on my boundary will be taken down
- My son has autism and is extremely sensitive to noise and has an acute smell – he won't be able to use our garden if there are noisy neighbours nearby having BBQ's etc

Highway concerns

- More cars, more traffic, more accidents
- The roads around Brokerswood are narrow, single track lanes which are used by locals, cyclists (route 254), runners and horse riders
- It is along a single track with no passing bays and the access to our house will be restricted

- 3 change over days will cause havoc in our area as can be seen at Longleat
- Increase in traffic movement due to no facilities being available
- No public transport available
- The Transport statement fails to include the existing educational trips in their forecast
- The site has been closed to open visitors from January 2013 onwards. On 3rd may 2014 it was re-opened to the public at weekends and school holidays only, until the autumn. It did not re-open to day visitors until 27th March 2015. There have not been over 60,000 visitors since the beginning of 2013
- The park sees sustainable methods of transport (coaches, minibuses etc) this will not happen with lodges
- The site is currently open between Easter and October and the proposed use will be all year
- There is hardly any traffic associated to this site in the winter – the proposal will see all year round traffic
- Only one access in and out is not acceptable
- There are already large vehicles using the small road network – milk tankers, tractors, hay balers – the proposal will only cause conflict with them
- The site lies between brokerswood and the A36 and Rudge will see an increase in traffic from cars accessing the site as will Southwick and Dilton Marsh
- The site is not as close to neighbouring towns as stated
- Increase in vehicular use from on site residents (shopping, visiting attractions and food outlets, staff, service lorries,
- The transport statement confirms that there would be a reduction in vehicular traffic during peak holiday periods – no figures have been given for the overall vehicle movements
- Existing cars and caravans damage the verges
- Will there be a bigger road?

Other

- Why were we not consulted on this application or the pre-application enquiry
- More litter
- More walkers will disturb our sheep and could result in lambs being still born
- We have memorial trees and benches on the site – what will happen to them

- No public consultation has taken place
- Security will be at risk as people on the site will not respect the local community
- The existing local B&B's, hotels etc will suffer
- Concerns about risk from fires, electrical fault, gas leak, smoke, will people be able to escape. Who is responsible for the risk and impact assessments, evacuation procedures etc
- It will ruin my childhood memories
- Why cant people just go to centerparcs
- Other applications have been refused because of an increase in traffic so the same should apply here (annexes, letting out stables)
- This application is purely to make money
- There will be an unacceptable impact on our local resources – doctors, fire service etc
- Why has the Council kept is soo secret from the public for soo long
- LPG storage is a potential bomb
- Thoulstone would be a better site for this
- 28 day consultation period is not sufficient to comment – the Applicant has had over 12 months – this is an abuse of the planning system
- What if I make a 999 call and the ambulance is not able to get down Silver Street due to the cars
- There will be a reduction in the amount of places we can walk our dog
- How long before swimming pools etc start to arrive on site
- There is a deed of dedication dated approx. 1958 which details how the woodland will be managed. This proposal contradicts this deed.

9. Planning Considerations

9.1 Principle

Brokerswood Country Park is an existing facility that is well used by the general public both by day visitors and through the use of the caravan/camping area.

Planning permission exists for the use of the site for 69 pitches. The key policy for making a recommendation on this application is Core Policy CP39 which states:

Extensions to existing facilities should be appropriate in scale to its location and help

to ensure the future viability of the business, including farm diversification schemes.

Proposals for camping and touring caravan sites (including extensions) will be supported where they can be accommodated without adverse impact on the character and appearance of the landscape and meet criteria iii to v below.

iii. the scale, design and use of the proposal is compatible with its wider landscape setting and would not detract from the character or appearance of the landscape or settlement and would not be detrimental to the amenities of residential areas;

iv. the building is served by adequate access and infrastructure; and

v. the site has reasonable access to local services and a local employment base.

CP39 is supported by paragraph 28 of the NPPF which states: *Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:*

- Support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through the conversion of existing buildings and well-designed new buildings;*
- Promote the development and diversification of agricultural and other land-based rural businesses;*
- Support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres*

The Wiltshire and Swindon Local Enterprise Partnership (SWLEP) through their study of hotel and visitor accommodation which was carried out in 2014 confirmed that there is a good potential for the development of additional holiday lodge accommodation and that Wiltshire and Swindon should be able to support the development of the type of woodland and lakeside holiday lodge parks that been successfully developed elsewhere in the country. Holiday lodge parks generate significant economic and employment benefits and possibly environmental benefits if they involve landscape restoration.

The proposal is for 90 holiday lodges to replace the 89 pitches that are currently in situ. 10 touring units and 10 camping pods are also proposed. There is therefore an increase of 21 pitches on the site. It is considered that this application meets the tests of the Wiltshire Core Strategy and the NPPF as it is a rural business that is seeking a small extension which will benefit existing rural businesses and the Wiltshire economy. The need is also not met elsewhere although many objectors have

compared the site to Center Parcs which the site is not comparable to as Brokerswood Country Park has no on-site facilities (other than a small café/shop) and is not a destination in its own right. Therefore in principle, the redevelopment of the site would be supported by CP39, the NPPF and the SWELP document, however this is subject to other material considerations which are outlined in the remainder of this report.

Objections have been received regarding the loss of the Country Park for day visitors and the loss of a community asset. Brokerswood Country Park is a privately owned business and is not a publically owned space. The country park could close its doors to the public at any time and the Local Planning Authority could do nothing to ensure that it remains open. In contrast, Southwick Country Park is located on the edge of Trowbridge and is an allocated country park in the Wiltshire Core Strategy that provides the public with free access (including wheelchair access) to the countryside. As Southwick Country Park is an allocated open space it is safeguarded from certain types of development. This is not the same for Brokerswood Country Park.

Concerns have been raised regarding the proposal becoming permanent dwellings. The proposal is not for permanent dwellings, the holiday lodges are purely for holiday use and holiday letting and stringent measures will be put in place through appropriate planning conditions to ensure that this remains. Haulfryn have also confirmed that they require legal agreements to be made between themselves and the lodge owners and proof documentation has to be provided to the Haulfryn group on an annual basis that owners of the lodges have a main residential address to ensure that future owners comply with the strict planning conditions.

Objectors have also raised the concern that there is no need for this development. Core Policy 40 (Hotels, bed and breakfasts, guest houses and conference facilities) of the Wiltshire Core Strategy confirms that there is a lack of both budget and high quality leisure accommodation within parts of Wiltshire and therefore there is a known demand. A further concern that has been raised is the issue of precedence. This proposal would not set a precedence for further holiday parks in the open countryside as this particular site already has planning permission for caravans and touring units and the proposal only increases the existing number of pitches by 21.

The Wiltshire Outdoor Learning Team and Activity Centre will continue to be operational at the site for 12 months of the year.

9.2 Impact upon the character and appearance of the area

Pitches

There are 2 types of holiday lodges proposed which are twin lodges (approximately 13.5m x 7m) and single lodges (approximately 12m x 4m) and both are single storey in height. The lodges are to be based on 4 different designs (Chichester, Rochester, Buckland and The Breeze) which have been submitted as part of the planning

application. The lodges are built on a chassis within a factory controlled environment which are fitted with wheeled axles and a tow bar to allow for transportation onto a low loader. The lodges are then transported to the site, wheeled off and manoeuvred into position and sited using a 4x4 vehicle or a tractor onto a levelled base using multiple supports beneath the chassis to allow the services to be connected. The lodges will be free standing and are classed as mobile structures under Section 29(1) of the Caravan Sites and Control of Development Act 1960, as modified by Section 13(1) of the Caravan Sites Act 1968.

The holiday lodges are low density, informal and non-regimented and will be constructed with a brown timber exterior under a dark charcoal non reflective finish. The window and door frames will be dark timber or grey. The materials are considered to be appropriate to their rural woodland setting and would allow the lodges to blend in with their immediate setting. To ensure that the exact colour is appropriate, a condition requiring samples to be submitted for approval can be attached to any positive recommendation.

To the East of the existing access is a small paddock that is used for touring caravans and camping. The proposal sees the use of this paddock remaining the same with 10 touring units being proposed which will utilise existing electric hook ups and water points. The touring units are brought onto the site by individuals for overnight stays and are usually towed on the road behind a vehicle. As there is no change to the use of this piece of land, there is no objection to this part of the proposal.

To the West of the existing entrance is the existing caravan park area with its associated washing facility, access tracks, parking facilities and hardstandings. As part of the proposal the washing facility is to remain which utilises the existing on site biomass boiler and will be used by user of the touring units and camping pods. This area under the proposed application is to be used for 9 single unit holiday lodges and 26 twin unit holiday lodges which will utilise existing electric and water facilities. There is no change of use of this particular piece of land and therefore no objection is raised in principle.

In the centre of the site there are existing touring caravan pitches and parking for both cars and coaches which are all accessed via existing tracks. Also in existence is the archery field and an existing chalet that is used on site as staff accommodation. Proposed in this particular area are 21 single unit holiday lodges and 1 twin unit holiday lodge to replace the majority of the existing parking area. Again there is no material change of use of this piece of land so no objection is raised in principle. Also within this area, the existing sheds are to be replaced with the proposed LPG tanks. These olive green tanks will be on concrete plinths and will be surrounded by a 1.8 metre high dark green, metal palisade fence which are considered to be appropriate to their landscape setting.

Adjacent to the existing train station and train shed (which are to be removed) is an

area where 10 camping pods are proposed which will be located amongst existing trees. The camping pods are generally referred to as glamorous camping facilities and are not fixed to the ground. They are constructed of timber, are fully insulated and will be connected to electricity and water via hook up points similar to the touring units. Due to the pods being built of timber, it is considered that they would blend into their rural woodland setting and would be an improvement on the existing train station buildings. Occupiers of these units will utilise the existing washing facilities and will park in a small part of the existing car park that is to remain.

The existing timber buildings (including the former museum building) which are located near to the existing lake are to be replaced with 7 single unit holiday lodges and 6 double holiday lodges. As the lodges replace existing outbuildings, no objection is raised.

To the north of the existing lake is a large bbq and picnic area with freestanding bbq's for the general public to use. This area is to be replaced with 4 single unit holiday lodges and 4 twin unit holiday lodges. The existing vehicular access to this area will remain but will be improved and will be used to access the proposed lodges. There will be some vegetation removal in this area but due to the site predominantly being previously developed, no objection is raised.

To the West of the existing caravan area is a field which is used for the camping of tents. Proposed in this area are 12 twin holiday lodges alongside substantial landscaping to the north. The proposal will see a change in this particular area due to the erection of timber lodges rather than tents, however as it does have planning permission for camping no objection in principle is raised for lodges being erected in this area.

Lighting

Low level lighting made of timber bollards approximately 800mm tall have been proposed which include an opaque diffuser down shade cover. The 3watt LED light would give a Lux reading of 0.5 at a distance of 5 metres. To put this into perspective, 1 Lux is equal to the illumination of a surface one metre away from a single candle. The proposed lighting can be conditioned to ensure that there is no increase in LUX levels and that no additional lighting is proposed. The proposed lighting bollards are to be facing away from the boundaries of the site to avoid light spill and energy waste and will be operated by dusk to dawn sensors. The lighting columns will be spaced at a minimum distance of 15 to 20 metres apart. The design and location of the lighting bollards are considered to be appropriate to their woodland setting. Wiltshire Council Public Protection and Ecology Officers have raised no objections to the proposed lighting detail and locations.

Trees

The entire woodland is classified as Ancient Semi-Natural Woodland and it has a

good existence of both flora and fauna species. Core Policy 51 requires developments to conserve add enhance locally distinctive patterns of natural features such as *trees, hedgerows, woodland, field boundaries, watercourses and waterbodies*. Paragraph 118 of the NPPF also states: *planning permission should be refused for development resulting in the loss of deterioration of irreplaceable habitats including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need and benefits of the development in that location clearly outweigh the loss.*

The site as existing has a high number of pedestrian footfall which has noticeably started to damage the ancient woodland through compacted woodland soil, woodland erosion, continued habitat disturbance and a loss of notable species. Due to the high level of pedestrian traffic during March/April to November, there is little time that is safe for the existing woodland to be appropriately managed annually. The current use has been assessed by the Wiltshire Council Ecologist as “*not sensitive to the ancient woodland and soils*”.

The lodges are to be located on areas which have previously been built upon or redeveloped and have been located on the advice of expert ecologists and arboriculturalists so that they can be accommodated with minimal impact upon the area but undoubtedly there will be some vegetation removal. The proposed lodges where possible have been sensitively located to ensure that they are outside the root protection areas of the high quality trees. The lodges will be based on concrete pads which will be between 200mm and 300mm in depth. Where there may be an impact on the tree roots, the lodges have been detailed to ensure minimal impact upon the rooting system through the use of screw-in piled foundations which avoids the need for a concrete pad. The lodges will also require the installation of services and these will predominantly be provided through a multi-service trench which will be located under the proposed new vehicular access tracks. This will require excavation within the woodland but is limited to areas that have previously been developed through existing tracks and/or buildings. A condition requiring how these trenches will be dug to avoid protected root systems can be added to any positive recommendation.

A tree survey has been carried out and submitted with the application which details the higher quality trees. The design of the proposal has been undertaken with the intention to avoid these high quality trees but will result in some tree loss but this is limited to non-native species and younger trees within the woodland. There will be no loss of veteran or ancient trees as part of this proposal.

The Wiltshire Council Arboricultural and Ecology Officers have attended various site visits and have both raised no objections to the scheme as the proposal re-uses existing developed areas to ensure that the cumulative impact on the ancient woodland is low. In their opinion the proposal would restore parts of the woodland, see additional woodland planting and an enhanced management of the site through appropriate mitigation and compensation (which are in line with the standing advice

from Natural England and the Forestry Commission). A Woodland Management Plan has been submitted with the application which will see the woodland enhanced and managed for a period of 25 years which has been considered by Wiltshire Council Officers to provide significant benefits for the ancient woodland habitat and associated species. The proposal is therefore considered to comply with CP51 and paragraph 118 of the NPPF. These recommendations are subject to various conditions all of which are considered to be appropriate.

Concerns have been raised regarding the impact on the Ancient Woodland through the construction process. The submitted surveys concluded that: *the processes of construction are highly unlikely to have a detrimental effect upon the health of the retained trees assuming that the tree protection measures that will be detailed in the AMS are adhered to at all times by the contractors.* The proposed development is utilising developed areas of the site and uses existing accesses and therefore any impact upon the area will be minimal. Furthermore, the requirements put forward in the tree survey for tree protection measures during construction can be conditioned to any approval.

Ecology

The Brokerswood Country Park in its current form has been participating in the Bellamy Conservation Award since 2001 and has achieved a gold award for the past 10 years which marks it out as a business that takes significant steps to maximise the ecological value of its green space and works effectively to minimise its impact on the environment.

CP 50 requires new developments to *seek opportunities to enhance biodiversity* and where possible should include *measures to deliver biodiversity gains through opportunities to restore, enhance and create valuable habitats, ecological networks and ecosystem services.*

As part of the application an Ecological Impact Assessment (ECIA) was submitted which included a Phase 1 Habitat survey alongside surveys for breeding birds, bats, dormouse, otter, water voles and badgers. The ECIA concluded that the *overall scheme provides an opportunity to secure the long term beneficial retention, and effective ecological management of a significant area of ancient woodland supporting a range of locally and regionally important species.*

The site is located within the Brokerswood and Hazel Wood County Wildlife Site (CWS). This CWS is described as a fairly large area of ancient semi-natural broadleaved woodlands containing a small holiday park. Approximately half of the proposed development (2.9 hectares) is situated within areas of improved grassland which is of minimal conservation value. Features of higher value including mature hedgerows, scattered trees and standing water all of which are to be retained. The remainder of the site is located within areas designated as Ancient Semi-Natural Woodland and Plantation on Ancient Woodland soils. This designation is nationally

important with both habitats considered as “irreplaceable”. The Wiltshire Council Ecologist is of the opinion that the proposal would not significantly impact upon the CWS.

The site is also located within the Bath and Bradford on Avon Bat Special Area of Conservation (SAC). The Wiltshire Council Ecologist has carried out a Habitat Regulations Assessment (HRA) on the proposed development which concludes that there would be no likely significant effects on the SAC due to the Woodland Management Scheme including specific measures for greater horseshoe bats and the lighting scheme being revised to reduce the light Lux to 0.5 at a distance from each bollard.

Habitat protection and enhancement measures have been proposed as part of the application to target key species and to provide high quality foraging and potential breeding habitats for local and regionally important species through the erection of bat/bird/owl boxes, habitat piles and reptile hibernacula. This includes a woodland management plan for High Wood and Hazel Wood (26.6 Hectares) which aims to restore, maintain and enhance the ecological value of the woodland whilst protecting it from contemporary threats such as pests/disease and climate change. Significant new belts of primary native species are also proposed along the south and west boundaries of the touring and caravan area to supplement existing screening and to create new wildlife habitats and wildlife corridors through linking existing vegetation up to the existing woodland. A 25 year woodland management scheme is also to be undertaken for the ancient woodland to restore, maintain and enhance the ecological value as well as attracting new species. The ratio of woodland habitat to be enhanced versus that to be impacted upon by the proposed holiday lodge development is approximately 10 to 1. The proposal does see the loss of 1.7% of ancient woodland habitat but this is considered to be more than adequately met by the proposal which will create new habitats, restore areas of woodland and the long term management of the woodland.

It is therefore considered that the proposal would have a small impact upon the existing woodland and habitats whilst providing an opportunity to secure the long term retention and effective ecological management of a significant area of ancient woodland that would support a range of locally and regionally important species. The proposal would result in a reduction in the amount of pedestrian footfall and leisure use activity within the ancient woodland. Under the proposed development, pedestrians would be restricted to specific areas adjacent to the built development further benefiting the site and existing habitats. The proposal is therefore considered to comply with CP50 and CP51.

The Woodland Trust objected to the application due to the impact on Round Wood. Round Wood is a County Wildlife Site (CWS) that is located south of Brokerswood Road. This CWS is not located within the site boundary and is not owned by Brokerswood Country Park and as such will not be affected by the proposed

development.

Concerns from the general public have been raised over the credibility of the Ecology Report. The Councils Ecologist and Natural England have approved the submitted details and therefore this would not be a reason to refuse the application.

Landscape

A significant amount of the proposed development is to be located on areas that have already been built upon, or have been redeveloped to some extent since Brokerswood Country Park was opened in the late 1960's.

The existing caravans, touring units and tents that utilise the site are visible from nearby roads. The proposed units will also be visible from the road but significant new belts of primary native species are proposed along the south and west boundaries of the touring and caravan area to supplement existing screening to reduce the visual impact upon those using the nearby road network. The proposal in terms of views from the existing road network is considered to be an improvement on what currently exists due to an improvement in materials.

Metalled surfaced roads are already located within the site alongside hardcore vehicular access tracks and footpaths within the sections of the woodland. Metalled surface tracks are proposed for the holiday lodge areas but as these are located within the site, they would not be visible from public vantage points. They have also been located to avoid the existing tree root systems.

Submitted with the application was a Landscape and Visual Impact Assessment report (LVIA) which concluded that *the proposed development will not result in any long term significant adverse landscape and visual impacts.*

It is considered that the proposal would have a small impact upon the wider landscape but when compared to the existing use alongside the additional proposed planting, it is considered that the proposal would not have a detrimental impact upon the landscape that would warrant a refusal reason and as such would comply with the requirements of CP50 and CP57.

Heritage Assets

The NPPF deals with determining planning applications that affect heritage assets in paragraphs 128 to 135. Paragraph 132 sets out that *when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be.* Significance is defined in the NPPF as *the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.* It goes on to note that *significance can be harmed or lost through alteration or destruction of*

the heritage asset or development within its setting and notes that substantial harm to or loss of designated heritage assets of the highest significance, including SAMs and Grade I & II Listed Buildings should be wholly exceptional. The setting of a designated heritage asset is defined in the NPPF as the surroundings in which a heritage asset is experienced.*

Paragraph 133 of the NPPF goes on to note, that where a proposed development would lead to substantial harm to or total loss of significance of a designated heritage asset, consent should be refused unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh the harm or loss.

In *Bedford Borough Council v Secretary of State for Communities and Local Government and NUON UK Ltd* [2012] EWHC 4344 (Admin), it was accepted that substantial harm is an impact which would have such a serious effect on the significance of an asset that its significance was either removed altogether, or very much reduced.

The Church of All Saints is located on Fairwood Road and is Grade II Listed as confirmed on Historic Englands website. It sits in the corner of a field that has mature hedging on its boundary and also has a small car park. It was listed on 14th January 2014 as it was a good example of a Gothic Revival tin tabernacle that displays a detailing above the norm for a church of this type. The listing goes onto say that the church is an increasingly uncommon ecclesiastical survivor and though typically modest, is substantially complete and retains many of its original fixtures and fittings. The church is therefore primarily listed for its architectural interest and rarity.

This Grade II Listed church is located adjacent to the crossroads of Fairwood Road and Brokerswood Road and lies south west of the existing park. Due to existing landscaping (including the hedging on the boundaries of the church which are outside of the applicants control) and proposed robust planting on the site subject of this application, the proposal of which some lodges would be visible would not harm the significance of this heritage asset as it will be retained and will not be altered.

The Conservation Officer is of the opinion that the proposal would not give rise to substantial harm to the heritage assets or its setting. The proposal is therefore considered to comply with CP58 and Section 66 of the of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Archaeology

CP58 states that development should protect, conserve and where possible enhance the historic environment. The Wiltshire Council Archaeologist has confirmed that due to there being limited below ground impact, no archaeological investigations are required. As such the proposal is considered to comply with CP58.

Flood Risk and Drainage

The site is not located in an area designated as at risk of flooding as the entire site lies within Flood Zone 1 which is the least likely to flood. The site is connected to the public water system and foul water disposal will be via an existing sewage treatment plant which was replaced in 2009 and caters for the existing touring park. The existing treatment plant discharges clean treated water to the existing water course known as Biss Brooks though an existing licence with the Environment Agency. Surface water will be discharged to the lake via a flow control which will restrict runoff to greenfield rates. The submitted Flood Risk Assessment concludes that the site can be developed safely and will not lead to an increase in flood risk on the site or elsewhere. Wiltshire Council Drainage Officers and the Environment Agency have not objected to the proposed scheme. The proposal is therefore considered to comply with Saved Policy U1 of the WWDLP.

Sustainable Construction

The proposed lodges are insulated and have integrated appliances at level A (very energy efficient and have low running costs), double glazed windows, combined heat and power boilers, intelligent heating controls and the technical ability to recycle rainwater for flushing toilets and washing machines.

Alongside the biomass boiler that is already on site which is fuelled mainly by logs from the site, there is an existing on site recycling area which will be utilised by future occupiers. Furthermore cooking oil that is used on the site is recycled and used by the Wiltshire Outdoor Learning Team (WOLT) to run their minibus. Existing logs are also put through a wood chipper to create chippings for the landscaped areas and food in the café is sourced from local outlets.

It is therefore considered that the proposal achieves a high level of sustainable construction and would therefore comply with CP41.

9.3 Highway Impact

Brokerswood Country Park is a well-established tourist development. The existing access off Brokerswood Road is a single carriageway road measuring approximately 4.8 – 5.4 metres wide and is wide enough for two cars to pass. It has a speed limit of 60mph although due to the nature of the road, speeds are usually much lower. The existing access has good visibility and remains unchanged. It is clear from visiting the site, that the roads around Brokerswood are not single carriageway width but with slow vehicle speeds, are sufficient for two cars to pass.

Existing situation

The existing site has approximately between 12,800 and 16,000 adult tickets sold each year depending on weather conditions. The most popular ticket being sold is a mother with two children and therefore taking an average of 14,400 adult tickets sold

(between April to October), it has therefore been demonstrated by the applicant that the total day visitors to the park would be approximately 43,200 visitors a year. Using these figures it has been estimated that a total of 302 two-way vehicle trips occur at the site during the peak periods.

School parties visit the site on a regular occurrence, especially during May, June and July. Approximately one coach per day visits during this period equating to 5 coaches per week for eleven weeks totalling 55 coaches (approximately 2,750 children). An additional two coaches per week brings other passengers between April and November (approximately 3,200 passengers).

The average occupancy for the caravan/camping pitches is approximately 96% for the 6 week summer holidays, and 85% for the remainder of the season. During the 6 week summer holiday the volume of traffic associated with the caravan and camping park is approximately 140 vehicles a day (based on the 6 week peak season). This takes into account consideration for people leaving the site at least once a day for local attractions, supermarkets etc and 30% of occupants having a second car. This would result in an average of 182 two-way vehicle trips a day at peak periods.

Taking into account the average two-way vehicle trips from day visitors, caravan/camping and coach arrivals, the site as existing has an average of 486 two-way trips during the peak periods.

Elements that have not been included in the above figures include birthday parties (which require a minimum of 20 children which leaves a potential of up to 20 vehicles dropping off and picking up children), those who currently pay an annual fee to enter the park and corporate team building days.

The figures provided by Brokerwsood Country Park have been taken from till receipts (produced by the ICR Touch Till System), independently audited and verified by Chartered Accountants and have been used for tax and VAT purposes which have subsequently been agreed by HMRC.

Proposed situation

The proposal will see a reduction in the amount of coaches, touring caravans and vehicles with trailers as there will be predominantly lodges on the site. There are currently 89 pitches and this will be increased to 110 pitches (addition of 21 pitches) of which only 10 are for touring caravans. This will result in a significant reduction in the amount of large vehicles and trailers using the local road network.

The proposal sees the closure of the site to day visitors (other than day visitors who will be visiting those staying at the site) and therefore there will be a significant reduction in day visitors to the site. It is acknowledged that the Local Planning Authority have no control over whether the site is physically closed to the general public, however the proposed layout would reduce the likelihood of day visitors as

there would be no car park for them to use (the existing car park is being removed and replaced with lodges) and visiting the site on foot would be extremely difficult. There are also no public rights of way that cross the site so people will only be able to access the site through the existing barriers. Furthermore, some of the attractions that are visited by day visitors are proposed to be removed (train, adventure playground, education buildings etc). A timetable can be conditioned on any approval to ensure that they are removed from site which would significantly reduce the attraction of visiting the site as a day visitor.

Currently many large coaches utilise the Fairwood Road entrance which is single track but is usually the main exit as there is usually a one-way road network in place. If permission is given this exit will not be utilised by coaches and will remain as a one-way traffic route system for the site.

The submitted Transport Assessment uses the figures in the Trip Rate Analysis for the proposed development as 110 daily arrivals and 89 daily departures amounting to 199 two-way daily trips at the peak period (Exact figures are not available as the use has not been commenced and other similar holiday parks in the country have different characteristics etc that would not be comparable). When compared to the existing average of 486 two-way daily trips, the proposal would result in a loss of 287 two-way daily trips. These figures are based on the peak period so demonstrate a worse-case scenario.

It is acknowledged that an additional 21 pitches are proposed and that the majority of the pitches would be used all year round and which could result in an increase in vehicular movements outside of the current peak periods. However in total there would be a decrease in the amount of vehicular trips associated with Brokerswood Country Park over the year.

The proposed access routes within the site will be utilising where possible existing routes and where they are new, are located in areas that have previously been developed. There are also appropriate parking facilities adjacent to each individual lodge to be used by its occupiers.

Brokerswood Country Park currently advises those who wish to visit the site to use the preferred route of the main A361. This will continue to be in place in new brochures but is not enforceable.

The proposed lodges will need to be brought on site using large lorries and trailers, however this would not warrant a reason to refuse the application as it would only be for a temporary period of time.

In the last 5 years Wiltshire Council have confirmed that there have been 2 accidents in the near vicinity of Brokerswood Country Park both of which were due to adverse weather conditions (skidding on ice, avoiding standing water). The roads around Brokerswood Country Park are therefore considered to be relatively safe. It is

acknowledged that there may be further accidents in the area but the Local Planning Authority can only take into consideration those accidents which are reported.

Highway Conclusion

The site is being increased by a further 21 pitches. It is acknowledged that the proposal would have an increase in the amount of traffic at certain times of year when compared to the existing use (primarily during the winter months) but it is anticipated that the proposal over the year would create no increase in traffic associated with this site than currently uses the local road network. In fact it is anticipated that there would be reduction. The amount of large vehicles and trailers using the local road network would be significantly reduced due to the amount of touring pitches being reduced which would be safer for walkers, cyclists, milk tankers and any other existing road users. The proposal also provides sufficient parking places. The proposal is therefore considered to comply with Core Policies 60, 61 and 64 of the Wiltshire Core Strategy.

Concerns have been raised regarding the impact of the nearby PROW from an increase in people possibly using them and the effect this would have on livestock. This is not a material planning consideration when making a recommendation on this application as there is no limit as to how many people can access an existing PROW. Concerns regarding there being no public transport or on site facilities being available for future occupiers of the proposed site is no different to the current situation and on the basis that there is an increase of just 21 pitches, this is not considered to warrant a refusal reason. Changeover days have also raised concerns in the local vicinity due to traffic waiting to leave and enter the site as is found on similar sites, however the proposed development does not have as many pitches as Center Parcs and is not a similar use to Longleat and therefore these are not appropriate sites to compare the proposal against. There will undoubtedly be change over days that may cause small traffic queues in the local area at certain times of day but this will be over a short period of time. It is important to highlight that the current use of the site causes severe traffic delays in peak periods due to traffic queuing to access the site, however the daily traffic associated with the proposed use would be significantly lower. Concerns regarding the traffic figures put forward have also been highlighted indicating that the number of cars who currently use the site on a daily basis have been exaggerated (but are based on till receipts at peak times), no allowance has been made for additional cars to the lodges, additional family members arriving on different dates, no shopping trips or excursions have been taken into consideration. However the proposed figures indicate up to 199 two-way daily trips on an annual basis. There will not be visitors using the entire site for one night 365 days a year and therefore the figures would include those leaving and entering the site for daily requirements.

9.4 Impact upon neighbouring amenity

There are few neighbouring properties that lie adjacent to this site and they mainly lie to the south west and north west of the site.

The closest dwelling to the proposed lodges is known as Brockvere. Existing tent camping pitches are located approximately 55m to the south of this properties garden and have been in existence since the late 1990's although it has to be acknowledged that this would not result in all year round use due to weather restrictions. Significant planting is in existence between Brockvere and Brokerswood Country Park which is entirely within the ownership of the neighbouring occupants and therefore cannot be removed by the Applicant. The amended plans have moved the proposed lodges away from this boundary which has resulted in a reduction in the amount of pitches in this area alongside proposing a significant landscaping (250 square metres of additional woodland with trees a minimum of 2 metres high to be planted) to further reduce the impact of the proposal upon the neighbouring dwelling. Lodge number 35 would be the closest in this area and is located approximately 25 metres from the boundary to Brockvere which is considered to be of satisfactory distance especially given the existing and proposed landscaping.

There are 3 lodges located to the East of the existing dwelling known as Brockvere. One of these lodges is replacing the existing on site staff lodge and therefore it is considered that it would not result in an increase in amenity issues that would warrant a refusal reason. Pitches 54 and 55 would be additional lodges and the rear of these lodges would be approximately 20 metres from the boundary of Brockvere. These two lodges are located on areas that were historically used for touring caravans and is currently used for the paring of coaches and vehicles. There is also a substantial existing landscape buffer that exists between these two proposed pitches and the boundary with Brockvere. Therefore it is considered that due to the distance between the rear of the proposed lodges to the site boundary there would be some increase in noise that would impact upon the amenity of the occupiers of Brockvere. However given the fact that this area is currently used for the parking of coaches and vehicles together with the road layout ending at pitch 55 so the only people who would access this area are those associated with pitches 53-55 so associated vehicle noise would be low, alongside the existing and proposed landscaping, it is considered that the increase in noise would not be sufficient to warrant a refusal reason. The holiday lodges also have significant higher levels of insulation compared to tents and touring caravans so noise associated with them would be reduced.

The diesel locomotive that currently runs through the site and runs all year round (it has approximately 3000 day visitors during the Christmas period) can be heard from the neighbouring dwellings. This is being removed which will see the removal of the associated noise.

The outdoor activities will remain on site and do already result in noise that can be heard from nearby residential dwellings. There will be a significant reduction in the

use of these outdoor activities and therefore associated noise will also be reduced.

With regards to vehicle movements associated with the site, there are existing residential properties that are located near to the exit. However as already stated there would be reduction in traffic movements over the year and a significant reduction in coaches and large vehicles with trailers which would only improve the amenity of the occupiers of these nearby residential dwellings when compared to the existing use.

The proposal is considered not to raise any neighbouring amenity issues that would warrant a refusal reason and as such the proposal is considered to comply with the requirements of CP57.

Concerns have been raised by the general public regarding an increase in pollution, noise, dust, light but when compared to the existing permission that consist on site, the proposed use would not significantly increase these concerns to warrant a refusal reason. A further concern is the use of the nearby lanes by pedestrians and those in wheelchairs. It is considered that the proposed use would be no different when compared to the existing use and therefore pedestrians will not be impacted upon significantly more that would warrant a refusal reason.

9.5 Benefits

There would be an increase in the economic benefits due to a small increase in the number of pitches alongside the lodges being capable of being used all year round.

The proposed use would create additional employment to what currently exists. The current park employs during peak season 5 full time staff and 6 part time staff. The proposed use would seek to turn the seasonal employment into full time (all year) employment and it is envisaged that the park would seek to employ 10 full time and 5 part time employment positions to ensure the park can operate for the day to day requirements of an all year round holiday park.

By encouraging people to use the facility all year, the proposal would also contribute to the economic viability of services and facilities in the local area.

9.6 Other

Concerns raised by the public include the consultation on the pre-application enquiry and the current application. Pre-application enquiries are confidential and therefore no public consultation is carried out. Those dwellings that are immediately adjacent to the site were consulted/notified of this application via a letter (sent on 23rd February), green site notices were erected around the site (26th February 2016) and a press advert was put into the Wiltshire Times on 4th March 2016 all of which required comments to be submitted by 25th March 2016 giving the local community 32 days to make their comments which is more than the legal requirement of 14 days. The

Council has therefore carried out its duty to consult in the correct manner.

There are existing memorial benches and trees on site, none of which are protected and therefore could be removed at any time without the need for planning permission. However the Applicants have confirmed (agents letter 06/06/16) that they have a list of names, addresses and contact details for anyone who has purchased a memorial tree/bench and that no memorial trees or benches will be affected by the proposal as they are located away from the main public areas. Family members will not be prevented from visiting as is the existing situation when the site is closed to the general public.

Concerns regarding security, litter, the impact on existing tourist accommodation, childhood memories, other potential sites to locate this development, possible future development at the site associated with the proposed development, future accidents that may happen, health and safety on the site (when in full use), existing legal agreements and financial implications are not material planning considerations and therefore cannot be taken into consideration when making a recommendation/decision on this application.

Concerns have also been highlighted regarding previous applications being refused due to an increase in traffic. Several applications in the area have requested agricultural workers dwellings or annexes to these dwellings which would be considered under separate policies associated with its use and therefore would not be comparable to this current application. An application was refused for the erection of a holiday let (W/13/01891/FUL) due to the encroachment into the open countryside and its unsustainable location. This is not a comparable application to an existing holiday park that utilises existing developed areas, furthermore it was issued before the adoption of the Wiltshire Core Strategy. Applications have also been refused for stables in 1993 and 1995 which were before the Wiltshire Council Core Strategy was adopted and also before the NPPF was introduced so there have been significant legislative changes since this time and therefore are not comparable to the development subject of this application.

10. Conclusion

The proposal provides an opportunity to secure the long term beneficial retention, and effective ecological management of a significant area of ancient woodland. The park would continue to contribute to the local economy through all year round holidaymakers supporting local shops, services and trade whilst securing and opening up employment opportunities. The year round traffic associated with the proposed use would be less than the existing use alongside a significant reduction in the amount of trailers and coaches being used on the local road network. The proposal would not impact upon neighbouring amenity sufficient to warrant a refusal reason and would not harm the setting of the nearby Grade II Listed Building or wider landscape. The proposal development is considered to be a unique opportunity to provide a luxury

holiday village that will also maintain and enhance the ancient woodland, as well as other protected habitats on site in the long term. The proposal has received no objections from statutory consultees and is considered to comply with all of the relevant policies of the Wiltshire Core Strategy, the NPPF and other legislative changes and as such is recommended for Approval.

RECOMMENDATION: Recommend Approval subject to the conditions outlined below:

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

- 2 The use of the site hereby permitted is restricted to 90 lodges, 10 touring unit pitches and 10 camping pods and shall not be used for any other purpose.

No more than either one tent, caravan, lodge (as defined in the Caravan Sites and Control of Development Act 1960 (amended by Statutory Instrument No 2374 1st October 2006) and the Caravan Sites Act 1968) or pod[s] shall be stationed on each pitch at any time.

REASON: To control the number of pitches to ensure the adequacy of parking provision and in the interest of the character and appearance of the area.

- 3 Notwithstanding Class C3 of the Schedule to the Town and Country (Use Classes) Order 1987 (as amended)(or in any provisions equivalent to that class in any statutory instrument revoking or re-enacting that Order with or without modification), the accommodation hereby permitted (lodge numbers 1 to 67 and 69 to 90, camping pods 1 to 10 and touring unit pitches 1 to 10) shall be used to provide holiday accommodation only, which shall not be occupied as permanent, unrestricted accommodation or as a primary place of residence. An up to date register of names and main home addresses of all occupiers shall be maintained and shall be made available at all reasonable times to the Local Planning Authority.

REASON: This site is in a position where the Local Planning Authority, having regard to the reasonable standards of residential amenity, access, and planning policies pertaining to the area, would not permit permanent residential accommodation.

- 4 The occupation of the lodge number 68 as annotated on drawing number LPD/BWCP16/HL5 shall be limited to a person solely or mainly employed or last employed in the business occupying the plot edged red on the submitted

location plan, or a widow or widower of such a person, or any resident dependents.

REASON: The site lies within an area where planning permission would not normally be granted for development unrelated to the essential needs of the established business for which nearby staff accommodation is now required and this permission is only granted on the basis of an essential need for a new dwelling/residential accommodation in this location having been demonstrated.

5 No demolition or site clearance shall commence on site until an Arboricultural Method Statement (AMS) prepared by an arboricultural consultant providing comprehensive details of construction works in relation to trees has been submitted to, and approved in writing by, the Local Planning Authority. All works shall subsequently be carried out in strict accordance with the approved details. In particular, the method statement must provide the following:

- A specification for protective fencing to trees during both demolition and construction phases which complies with BS5837:2013 and a plan indicating the alignment of the protective fencing;
- A specification for scaffolding and ground protection within tree protection zones in accordance with British Standard 5837: 2012;
- A schedule of tree works conforming to British Standard 3998: 2010;
- Details of general arboricultural matters such as the area for storage of materials, concrete mixing and use of fires;
- Plans and particulars showing the siting of the existing and proposed service and piping infrastructure (including pipes, drains, sewers, gas, electric, telephone and water);
- A full specification for the construction of any arboriculturally sensitive structures and sections through them, including the installation of boundary treatment works, the method of construction of the access driveway including details of the no-dig specification and extent of the areas of the driveway to be constructed using a no-dig specification;
- Details of the works requiring arboricultural supervision to be carried out by the developer;s arboricultural consultant, including details of the frequency of supervisory visits and procedure for notifying the Local Planning Authority of the findings of the supervisory visits; and
- Details of all other activities, which have implications for trees on or adjacent to the site.
- In order that trees to be retained on-site are not damaged during the

construction works and to ensure that as far as possible the work is carried no demolition, site clearance or development should commence on site until a pre-commencement site meeting has been held, attended by the developer; s arboricultural consultant, the designated site foreman and a representative from the Local Planning Authority, to discuss details of the proposed work and working procedures.

- Construction Method Statement to provide details of excavation works within the root protection areas and how the proposed routes of underground services will avoid high density areas of root systems of retained trees and details of alternative routes for these services.

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, in order that the Local Planning Authority may be satisfied that the trees to be retained on and adjacent to the site will not be damaged during the construction works and to ensure that as far as possible the work is carried out in accordance with current best practice and section 197 of the Town & Country Planning Act 1990.

- 6 No development associated with the lodges, camping pods and/or roads shall commence on site until a Landscape and Ecological Management Plan (LEMP) has been submitted to, and approved in writing by, the Local Planning Authority. The content of the LEMP shall include, but not necessarily be limited to, the following information:
- a) Full specification of habitats to be created, including locally native species of local provenance and locally characteristic species;
 - b) Description and evaluation of features to be managed; including location(s) shown on a site map;
 - c) Landscape and ecological trends and constraints on site that might influence management;
 - d) Aims and objectives of management;
 - e) Appropriate management options for achieving aims and objectives;
 - f) Prescriptions for management actions;
 - g) A copy of the final Woodland Management Plan;
 - h) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a {5-year period)

- i) Details of the body or organisation responsible for implementation of the plan;
- j) Ongoing monitoring and remedial measures, including an Ecological Monitoring Programme);
- k) Timeframe for reviewing the plan; and
- l) Details of how the aims and objectives of the LEMP will be communicated to the occupiers of the development.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body (ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that the conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented.

The LEMP shall be implemented in full in accordance with the approved details.

REASON: To ensure the long-term management of protected and priority habitats and other landscape and ecological features, and to maintain and enhance these habitats and features in perpetuity.

- 7 No development associated with the lodges, camping pods and/or roads shall take place (including demolition, ground works, vegetation clearance) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority. The CEMP shall include, but not necessarily be limited to, the following:
- a) Risk assessment of potentially damaging construction activities
 - b) Identification of 'biodiversity protection zones'
 - c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements)
 - d) The location and timing of sensitive works to avoid harm to biodiversity features (e.g. daylight working hours only starting one hour after sunrise and ceasing one hour before sunset)
 - e) The times during construction when specialists ecologists need to be present on site to oversee works
 - f) Responsible persons and lines of communication

- g) The role and responsibilities on site of an Ecological Clerk of Works (ECoW)
- h) Use of protective fences, exclusion barriers and warning signs, including advanced installation and maintenance during the construction period
- i) Ongoing monitoring, including compliance checks by a competent person(s) during construction and immediately post-completion of construction works.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details.

A report prepared by the Ecological Clerk of Works certifying that the required mitigation and/or compensation measures identified in the CEMP have been completed to their satisfaction, and detailing the results of site supervision and any necessary remedial works undertaken or required, shall be submitted to the Local Planning Authority for approval within 3 months of the date of substantial completion of the development or at the end of the next available planting season, whichever is the sooner. Any approved remedial works shall subsequently be carried out under the strict supervision of the Ecological Clerk of Works following that approval.

REASON: The application contained insufficient information to enable this matter to be considered in detail prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner and to ensure adequate protection, mitigation and compensation for ancient woodland, protected species, priority species and priority habitats.

- 8 No lodge shall be installed on the site until a palette of materials to be used for the external walls and roofs of the lodges hereby approved have been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, in the interests of visual amenity and the character and appearance of the area

- 9 No lodge or camping pod shall be installed on the site until a scheme for the discharge of foul water from the site, incorporating either phased improvements to existing treatment facility to provide increased capacity or an entirely new

treatment plant together with any discharge consents required, has been submitted to and approved in writing by the Local Planning Authority. The development, or phase, shall not be first occupied until foul water drainage has been constructed (for that phase) in accordance with the approved scheme.

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, in the interests of ensuring appropriate foul water disposal.

- 10 No lodge or camping pod shall be installed on the sited until a scheme for the discharge of surface water from the site (including surface water from the access / driveway), has been submitted to and approved in writing by the Local Planning Authority. The development shall not be first occupied until surface water drainage has been constructed in accordance with the approved scheme.

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, in the interests of ensuring appropriate surface water run off

- 11 No lodge or camping pod shall be installed on the site until a timetable for the removal of on-site infrastructure (adventure playground, train and its associated track, outbuildings etc) has been submitted to and approved in writing by the Local Planning Authority. The development shall then be carried out in accordance with the approved details.

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner.

- 12 The development hereby approved shall be carried out in strict accordance with the additional Ecological Information ref. 15-3614 v2 dated 07.04.16 by Lockhart Garratt Design received by the Local Planning Authority on 25th April 2016

REASON: To ensure adequate protection and mitigation for protected species, priority species and priority habitats, including ancient woodland, through the implementation of detailed mitigation measures that were prepared and submitted with the application before determination.

- 13 All soft landscaping comprised in the approved details of landscaping shall be carried out in the first planting and seeding season following the first occupation of the first building(s) or the completion of the development whichever is the sooner; All shrubs, trees and hedge planting shall be maintained free from weeds and shall be protected from damage by vermin and stock. Any trees or plants which, within a period of five years, die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species, unless otherwise agreed in writing by the local planning authority.

All hard landscaping shall also be carried out in accordance with the approved details prior to the occupation of any part of the development or in accordance with a programme to be agreed in writing with the Local Planning Authority.

REASON: To ensure a satisfactory landscaped setting for the development and the protection of existing important landscape features.

- 14 There shall be no lighting installed within the site other than those shown on the approved plans.

REASON: In the interests of minimising light levels and light spillage to avoid disturbance in the open countryside and to habitats.

- 15 The camping pods shall be constructed in accordance with the The Pod Brochure received by the Local Planning Authority on 7th June 2016.

REASON: To ensure the camping pods are appropriate in material and colour to their ancient surroundings.

- 16 No lodge hereby approved shall be first occupied until the associated parking spaces together with the access thereto, have been provided in accordance with the approved plans.

REASON: In the interests of highway safety and the amenity of future occupants.

- 17 The development hereby permitted shall be carried out in accordance with the following approved plans:

received on 20th January 2016

LPD/BWCP16/LP4 (Location Plan), LPD/BWCP16/TSL1A (Existing Layout), LPD/BWCP16/LPG1 (LPG Tank Elevation), LPD/BWCP/16/LPG2 (Tank Floorplans)

Received on 8th February 2016

Lodge Details: Rochester, Chichester

LPD/BWCP16/TSL1A/SR (Structures to be removed)

Received on 12th February 2016

Lighting Bollard Details

Received on 13th May 2016

3762/04/M15-2110 V5 (Operational Intentions Map)

3762/01/M16-0143 V2 (Ecological Mitigation Plan)

Received on 2nd June 2016

LPD/BWCP16/HL5 (Proposed Layout)

The Breeze House, Buckland

Received on 13th June 2016

LPD/BWWCP16/HL5/LB/1B (Lighting Bollard Location)

3762/04/D15-2713 V3 (landscape strategy plan)

REASON: For the avoidance of doubt and in the interests of proper planning.

1 INFORMATIVE TO APPLICANT:

Should works to, on, over, near or connections to ordinary watercourses form part of this application then a separate application for each will be required to be made to the LLFA for consent. Granting of planning permission does not mean automatic Land Drainage Consent approval

The applicant will need to contact the Environment Agency regarding and proposal to increase effluent discharge as proposals are likely to mean a need to amend existing or issue a new discharge consent

2 INFORMATIVE TO APPLICANT:

Foul Drainage

A private package treatment plant is proposed. The site currently benefits from an existing Environmental Permit for a discharge to river. However, this will need to be varied if it is to be applicable to the proposed treatment plant. The applicant must contact the Environment Agency on 03708 506 506 or view our website for further details in this matter - <https://www.gov.uk/guidance/change-transfer-or-cancel-your-environmental-permit>

Pollution Prevention During Construction

Safeguards should be implemented during the construction phase to minimise

the risks of pollution from the development. Such safeguards should cover: -
the use of plant and machinery - oils/chemicals and materials - the use and
routing of heavy plant and vehicles - the location and form of work and storage
areas and compounds - the control and removal of spoil and wastes