

# APPLICATION WITHDRAWN

## REPORT TO THE NORTHERN AREA PLANNING COMMITTEE

<b>Date of Meeting</b>	19 November 2014
<b>Application Number</b>	14/08312/VAR and 14/08313/VAR
<b>Site Address</b>	Wiltshire Golf & Country Club Vastern Royal Wootton Bassett Swindon SN4 7PB
<b>Proposal</b>	Variation of Condition 1 of 09/01056/S73A and 09/01057/S73A (Respectively) To Allow Flexible Use for Retirement Accommodation
<b>Applicant</b>	Wiltshire Leisure Village Ltd
<b>Town/Parish Council</b>	Royal Wootton Bassett Town Council
<b>Division</b>	Royal Wootton Bassett South- Cllr Hurst
<b>Grid Ref</b>	405148 181214
<b>Type of application</b>	Variation of Condition
<b>Case Officer</b>	Sam Croft

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### Reason for the application being considered by Committee

Applications called in by Councillor Hurst to consider the relationship of the development to adjoining properties.

#### 1. Purpose of Report

To consider the above applications and to recommend that planning permission is REFUSED.

#### 2. Report Summary

The applications relate to a number of lodges which have already been constructed as well a number that are yet to be implemented. Accordingly, this report has to consider both of these elements separately as they are assessed differently in planning terms. The two elements will be assessed on different criteria and a recommendation will be provided in respect to both. There are also a number of issues that are relevant to both applications

The main issues relating to the existing lodges are:

- Principle of development
- Sustainability
- Viability of existing units of accommodation with the currently attached conditions

The main issues relating to the lodges awaiting construction are:

- Principle of development
- Sustainability

Other issues relevant to both elements:

- Viability and need for development with the proposed conditions
- Enforceability of the proposed condition
- Affordable Housing

4 letters of support have been received from members of the public. Royal Wootton Bassett Town Council have provided no comments in respect to the applications.

### 3. Site Description

The Wiltshire Golf and Country Club is located to the south west of the town of Royal Wootton Bassett. The site is located outside of the framework boundary for Royal Wootton Bassett, as defined on proposal map 7a of the North Wiltshire Local Plan 2011, and is therefore considered to be in the open countryside. The main complex at The Wiltshire, including the leisure and hotel facilities associated with the site, is located in a prominent position on the crest of a hill, whilst the tourist lodges are located on lower land in the valley to the north. Development at the site is visible, in part, from Royal Wootton Bassett (to the north east). The site is predominantly surrounded by agricultural fields. The site is detached from Royal Wootton Bassett which is located 650m to the north east of the boundary of the site. The northern edge of the golf course site, between the site and the existing town, is characterized by a swathe of mature trees beyond which are agricultural fields and then the railway line which skirts to the south western edge of the town.

On 25 February 2009 planning permission was granted at appeal (APP/J3910/2076748) for tourism development (Phase 2) comprising 30 units at Wiltshire Golf and Country Club, Vastern, Royal Wootton Bassett, Wiltshire. The development constituted an extension of existing 44 units that had already been constructed at this site, which included a 58 bedroom hotel and leisure facilities. Both permissions were subject to condition restricting the development for holiday accommodation only and that it shall not be occupied from January 31st to February 28<sup>th</sup> inclusive in any year. Subsequently these conditions were subject to an application for variation (N/09/01056/S73A and N/09/01057/S73A). Following permission, the new conditions it read as follows:

*“The development hereby permitted shall be used for tourist accommodation only and the use shall be carried out in complete accordance with the measures included within the Occupancy Monitoring Statement dated 20th May 2009 submitted with this application, or any alternative version of the Statement that may be subsequently approved by the Local Planning Authority in the form of a planning application in that regard.*

*Reason:*

*To ensure that the development is only occupied as tourist accommodation only and not for permanent residential accommodation, which would not normally be permitted in countryside locations such as this.”*

Subsequent, applications N/11/04172/S73 and N/11/04174/S73 for the use of Phase 1 and Phase 2 lodges for retirement accommodation were made in 2011, but withdrawn.

It is understood that since the original permission was granted in 2009, 49 lodges have been constructed to date of the 74 consented. In addition the site now accommodates a hotel (58 rooms) and conference and leisure facilities (including gym, swimming pool, sauna, spa etc) and 18 hole golf course and associated 9 hole short course (27 holes in total). It is noted that there is also an extant consent for an extension to the existing hotel to provide a further 50 rooms ultimately delivering net 101 rooms in total.

### 4. Planning History

N/06/00278/FUL Tourist Accommodation Comprising 44 Holiday Lodges, Open Air Swimming

## Pool and Tennis Courts

- N/08/00706/FUL Tourist Accommodation (30 Units)
- N/09/01056/S73A Variation of Condition 2 to Planning Permission 06/00278/FUL Relating to Occupation as Tourist Accommodation.
- N/09/01057/S73A Variation of Condition 6 to Planning Permission 08/00706/FUL Relating to Occupation as Tourist Accommodation.

## 5. The Proposal

The application proposals incorporate the variation of the existing Phase 1 and Phase 2 permissions for tourist accommodation, in the form of holiday lodges, so that they may also be occupied as accommodation for people in their retirement.

The varied condition would read:

*“The development hereby permitted shall only be used for tourist accommodation or retirement accommodation for people aged 55 and over. The use shall be carried out in complete accordance with the measures included within the Occupancy Monitoring Statement dated 21st August 2014, or any alternative version of the statement that may be subsequently approved by the Local Planning Authority in the form of a planning application in that regard.”*

### *Reason:*

*To ensure that the development is only occupied as tourist accommodation or retirement accommodation for people aged 55 and over, and not for unrestricted permanent residential accommodation, which would not normally be permitted in countryside locations such as this.”*

Currently, 32 of the holiday lodge have been constructed with 42 remaining to be built. The 2006 permission also permitted the construction of a separate driveway to the development upon which work has already begun. As set out previously, given that some of the lodges have already been constructed and some remain to be implemented this report considers the Council's position in respect to both as they are assessed differently in planning terms.

## 6. Planning Policy

National Planning Policy Framework  
Sections 1, 6 and 7

Planning Practice Guidance

North Wiltshire Local Plan 2011  
C2 Community Infrastructure  
C3 Development Control Policy  
T1 Minimising the need to Travel  
T4 Cycling Walking and Public Transport  
H4 Residential Development in the Open Countryside  
H6 Affordable Housing in Rural Areas

Emerging Wiltshire Core Strategy (Submission Draft as proposed to be amended) April 2014

CP1 Settlement Strategy  
CP2 Delivery Strategy  
CP3 Infrastructure Requirements  
CP19 Spatial Strategy: Royal Wootton Bassett and Cricklade Community Area  
CP43 Providing Affordable Homes  
CP46 Meeting the Needs of Wiltshire's Vulnerable and Older people

CP57 Ensuring High Quality Design and Place Shaping  
CP60: Sustainable transport

It should be noted that there are no specific policies in any adopted planning policy document that directly address the variation or removal of planning conditions restricting residential occupancy to holiday accommodation use to allow retirement use.

## **7. Consultations**

Royal Wootton Bassett Town Council – No comment

Highways – Objections to proposal on the basis of sustainable transport. Concerns were also raised in relation to the traffic generation in comparison to the existing tourism use.

New Housing – Affordable housing contribution required.

## **8. Publicity**

4 letters of representation were received supporting the application, on the basis that:-

- The village represents a safe communal environment in which to live;
- It has developed a supporting village culture in which everyone looks out for each other
- The availability on onsite hotel and leisure facilities;
- Ground floor accessible en suite bedroom, in certain properties, would make it an ideal place to retire without the concern and expense of another property and garden to maintain;
- Very few, if any houses, in area that meet the need of those looking to downsize in retirement; and,
- The proposed change will have positive effects on helping contribute towards the Government policy of bringing more dwellings on to the market to meet increasing demand, by allowing older people to free up houses elsewhere rather than maintain more than one.

## **9. Planning Considerations**

### **Constructed lodges**

#### Principle of development

The principle of residential development in respect to the 32 units already constructed is not available for consideration as part of this application. The proposal is merely a variation and removal of conditions restricting occupancy of 32 holiday units that are already built. The proposal is not for the erection of new residential development and as such the principle of a residential development in this location is not available for consideration. The issue for assessment is the viability of the current use, which formed the basis for the grant of the original consents and whether or not lack of viability of this permitted use provides a justification and requirement to change to the proposed use. These matters are discussed in detail below but the relevant issue here is that these are material circumstances that are specific to this site only. These types of financial considerations are solely material to each individual site and the form and type of development that has been constructed and the circumstances relevant to the locality will inform such matters and will vary from site to site. As such they do not define any standard or establish any form of precedent that must be adhered to and which would restrict the determination of other such proposals on other sites. Other such holiday let facilities in other locations would need to be assessed on their own individual merits and site circumstances.

Furthermore the Council in determining any application is duty bound to act reasonably and determine the applications that are submitted on the basis of relevant material considerations and circumstances. As such it is not appropriate for any Local Planning Authority to determine an application on the basis of what may possibly happen in the future or what their position may have

been with respect to a theoretical situation i.e. a wholly new proposal for new build residential development. The Council's decision must be defensible and justifiable in the event of an appeal. Refusal on the grounds that a new build residential development would be unsustainable in this location would not meet this test. The matters in respect of the sustainability of the proposal that can be assessed are addressed in the report below.

In terms of the residential conditions that would result from the new restricted residential occupancy arrangement it is considered that the site layout affords a reasonable level of residential amenity.

### Sustainability

The scope of the sustainability assessment is circumscribed by the fact that the units that are in place and therefore only take into account sustainability as it relates specifically to the different form and extent of residential occupancy now proposed in respect of these already constructed units. The assessment of the units yet to be constructed is assessed in relation to sustainability and other material considerations separately below.

The proposed use as retirement accommodation is considered differently in policy terms, than that of tourist developments already permitted. As it stands the North Wiltshire Local Plan 2011 (NWLP) does not include any policies which relate specifically to retirement dwelling. However, the Emerging Wiltshire Core Strategy (Submission Draft as proposed to be amended) April 2014 (WCS) sets out in Core Policy 46 the Strategy's approach to meeting the need of Wiltshire's vulnerable and older people. Core Policy 46 is clear that specialist accommodation should be provided at the settlements within Core Policy 1, such as the principle settlements and market towns. Only in exceptional circumstances, the provision of specialist accommodation outside but adjacent to these settlements will be considered provided they meet relevant criteria listed in the policy. Given that the proposal is in open countryside as established above, and not adjacent to the settlement of Royal Wootton Bassett, it is clear that it does not meet the specific requirements of the policy.

It is therefore clear that despite permission having been granted for tourist accommodation in the open countryside there use as retirement dwellings would be considered to be inappropriate in terms of the policy 46 of WCS.

### Viability of existing units

No information has been provided in respect to the viability of any of the lodges that have been built already for the permitted tourist (Holiday let) use and which will be subject to the variation, as to why the application has been sought in respect to the deviation from the original permission. It is noted that the intention is that the lodges could be used as either tourist or retirement accommodation. However, evidence relating to why the existing lodges are no longer viable for that permitted use, including marketing to identify demand for the permitted and proposed uses, would be expected to be provided in order to demonstrate that the application is appropriate. This is as a result of the in principle policy position described above that retirement dwellings would not be appropriate in this location. No such marketing or indeed occupancy rate information from existing levels of use has been submitted and it is therefore unclear as to why the proposed variation of use and occupancy is necessary and appropriate. Information has been provided in respect to the need for retirement accommodation in the district which is dealt with in greater detail below.

### Lodges Awaiting Construction

#### The principle of development

The principle of residential development in respect to the 44 units yet to be constructed is available for consideration as part of this application, as the applications are tantamount to a new proposal on the site despite the extant permission. In respect to residential development in this location, North Wiltshire Local Plan 2011 (NWLP) Policy H4 is pertinent. The proposal is outside the settlement framework boundary of Royal Wootton Bassett and, being unrelated to the needs of

agriculture, forestry or other rural based enterprise is contrary to Policy H4 of the NWLP which seeks to resist new dwellings in the countryside.

This is carried through into the Emerging Wiltshire Core Strategy (Submission Draft as proposed to be amended) April 2014 (WCS), in which there is a clear presumption against development outside the defined limits of development of the Principal Settlements, Market Towns, Local Service Centres and Large Villages. Core Policy 2 of the WCS sets out that development outside of the limits of development will only be permitted where it has been identified through community-led planning policy documents including neighbourhood plans, or a subsequent development plan document which identifies specific sites for development. This development must be adjacent or well related to the limits of development. The site is located 650m from Royal Wootton Bassett and is surrounded by fields and with the nearby railway forming a clear man-made barrier. Accordingly the site would not be considered to be adjacent or well related to the limits of development.

National policy also restricts residential development in the open countryside. Paragraph 55 of the Nation Planning Policy Framework (NPPF) states that “to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby. Local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances”. The rural countryside location of the proposed development would create a physically isolated residential development, given its distance from Royal Wootton Bassett. In addition none of the special circumstances listed under paragraph 55 are met by this proposal. The proposal therefore runs counter to the provisions in the NPPF.

It is noted that the approved tourist accommodation represents the ‘fall-back’ position for this application and similarly constitutes restricted residential development (Use Class C3) in the open countryside. However, the proposed use as retirement accommodation is considered differently in policy terms, than that of tourist developments. The WCS sets out in Core Policy 46 the Strategy’s approach to meeting the need of Wiltshire’s vulnerable and older people. Core Policy 46 is clear that specialist accommodation should be provided at the settlements within Core Policy 1, such as the principle settlements and market towns. Only in exceptional circumstances, the provision of specialist accommodation outside but adjacent to these settlements will be considered provided they meet relevant criteria listed in the policy. Given that the proposal is in open countryside as established above, and not adjacent to the settlement of Royal Wootton Bassett, it is clear that it does not meet the specific requirements of the policy.

It is therefore clear that despite permission having been granted for tourist accommodation in the open countryside there use as retirement dwellings would not be considered to be inappropriate in terms of the policy 46 of WCS.

### Sustainability

The scope of the sustainability assessment for the 44 units yet to be constructed is much broader for the same reason that the principle of development was open for assessment.

The sustainability of the site in terms of its location in the open countryside has already been assessed in above; However, the Planning Statement seeks to demonstrate that the development is sustainable in terms of relationship of development at The Wiltshire to the nearby town of Royal Wootton Bassett, including accessibility by sustainable modes of transport. Furthermore, the applicant sets out that the extensive range of the services/facilities available on site limit the need for off-site trips for residents of the lodges, and in fact provide a leisure and recreation hub for significant numbers of people from Royal Wootton Bassett and the surrounding community.

It is acknowledged that occupant would have access to the services and facilities available on site including gym, swimming pool, sauna, spa, 18-hole golf course and associated 9-hole short course, restaurant and bar. In addition, Royal Wootton Bassett offers a range of facilities and services such as a library, a museum, and surgeries and it has a sizeable retail offer. In terms of

accessibility by sustainable modes of transport there is a regular bus service (every 20 minutes between 06.19 am and 23.45pm) from the High Street to the Golf Course bus stop and vice versa. However, the bus stop is located approximately 500m away and is located on the other side of the A3102. Walking distance between the town centre and the proposed site is approximately 31 minutes and there is no pavement along the majority of the A3102, nor is there a public footpath. It has also been suggested that occupant would be able to cycle into the town centre. However, despite the target market of active people of 55 years of age or older in reality there will be occupants of who would be considerably older and may not be sufficiently physically fit to cycle or walk the distance to Royal Wootton Bassett and back, as suggested.

Policy T1 of the NWLP seeks to minimise the need to travel and states that new development should be designed and located to minimise the need to travel whilst being accessible by cycling, walking and public transport. The policy also requires that housing developments should be accessible to jobs, education, health facilities, shopping, leisure and local services. This policy is carried through in the WCS in Core Policy 60 (Sustainable Transport) which sets out that the council will use its planning and transport powers to help reduce the need to travel, and support and encourage the sustainable, safe and efficient movement of people and goods within and through Wiltshire. The policy sets out how this will be achieved, including planning developments in accessible locations and promoting sustainable transport alternatives to the use of the private car. Therefore, whilst the onsite services and facilities may limit the need for off-site trips for residents, not all relevant facilities are provided. Occupiers would therefore need to be able to access Royal Wootton Bassett by appropriate sustainable transport alternatives, reducing the need to use private cars, in order to comply with these policies. It should be noted that despite the service and facilities available on site, this would be considered as a community and therefore residents would be reliant upon travelling to Royal Wootton Bassett to feel part of a community also, contrary to Policy 46 of the NWLP.

Whilst there is a regular bus service from outside the site this on its own would not be considered sufficient for the development to be considered sustainable. In addition to which the bus stop is located approximately 500m from the development which is greater than the general accepted distance. The site is not easily accessible by other forms of sustainable transport modes and for the proposed target market walking and cycling the required distances may be unviable. It is therefore considered that there would be a reliance on the private car which would be contrary policy T1 of the NWLP and Core Policy 60 of the WCS. On this basis, there is currently an outstanding objection from Highways on sustainability grounds.

Regarding trips undertaken by the private car the Council's highway officers also disagrees with the suggestion within the Transport Statement that traffic generation from retirement use will be little different from holiday use as this is based on the assumption that all occupants will be fully retired. Over 55s can still be active in employment and the condition may not be sufficient to restrict occupants from getting full or part-time jobs. If this is the case that the traffic generation would be little different from unrestricted use as dwellings.

Based upon that which is set out above this proposal is considered to be residential development in open countryside and would not be served by sufficient sustainable transport alternatives to the private car. The development is therefore considered to be inappropriate based on the provisions in the NWLP, WCS and the NPPF.

## **Other Issues**

### **Viability and need for development with the proposed conditions**

The Planning Statement, which accompanied the applications, identifies at paragraphs 6.2 – 6.10 the significant growth in the numbers of the population living longer, and the growth in population resulting from the 'baby boom' in the post World War II era. In terms of the growth of population in the over 55 age group, this has been specifically referenced for the Royal Wootton Bassett and Cricklade Community Area and identifies that the overall number of people aged 55 and above in

this area and the proportion of the overall population increased significantly between 2001 and 2014 and is projected to continue to do so through to 2026.

In addition to the statistics included in the Planning Statement, further information was submitted in the form of the Office for National Statistics (ONS) latest pension trends publication (2012) which shows the proportion of people at each age leaving the labour market. The applicant stated that it shows that there is a wide spread of retirement ages and more specifically shows that 26.1% of women and 16.7% of men had left the labour market before age 60). In addition to this information no marketing identify the demand for the proposed uses has been provided, other than a list of similar developments permitted in the area. Accordingly, the assessment is purely based upon the trends referenced in the Planning Statement.

Despite these trends it remains questionable whether people will fully retire as early as 55; and therefore if it is appropriate to use this figure for assessing the need for further retirement accommodation. While the rise in total number of people in the age groups over 55 in the Royal Wootton Bassett Community Area is acknowledged in the Council's Joint Strategic Assessment for the area, based on the Census data, this does not mean that there is necessarily a correlation with retirement age. The Joint Strategic Assessment for the Royal Wootton Bassett and Cricklade Community Area shows that it has just above the Wiltshire average percentage of its total population at retirement age and over (21.8%). Nationally, the ONS data shows that for men, the estimate of average age of withdrawal increased from 63.8 years in 2004 to 64.6 years in 2010. For women, it increased from 61.2 years in 2004 to 62.3 years in 2010. In addition the ONS latest pension trends publication (2012) shows that for men the age of labour market withdrawal peaks between 64 and 66 years and for women, the peak is between 60 and 62 years. Therefore, while it would be reasonable to assume that retirement age would be between 61-63 years, setting it at 55 appears to be relatively early, especially as the national population is evidently working longer based on the increase of the average age of withdrawal in both men and women between 2004 and 2010.

On this basis, there does not appear to be strong evidence which would indicate that people will retire earlier, and that this is the case in the Royal Wootton Bassett and Cricklade Community Area, nor has evidence been provided that there is a specific market demand for these kinds of development. Therefore whilst there is a need for the provision of new housing to meet the specific needs of vulnerable and older people will be required, as set out in Core Policy 46 of the eWCS, the proposal would not be considered to meet the specific needs of the area or Wiltshire as a whole.

#### Visual Impact

There are concerns that the proposed development could impact upon the visual amenity of the area. The change of use to retirement dwellings, in contrast to a tourist accommodation that is unlikely to be occupied year-round, is likely to give rise to the proliferation of domestic paraphernalia including garden furniture, private vehicles, garden and play equipment and external storage that would not be anticipated as a consequence of the existing use. It may also be the case that occupier under the new condition might seek to alter existing boundary treatments to provide a greater level of privacy. This, it is considered, is inappropriate in an area of open countryside and would harm the character and appearance of the site. For these reasons, it is considered that the proposal would harm the character and appearance of the site and visual amenity of this open countryside locality.

#### Enforceability of the Condition

Initially there were concerns as to whether the proposed condition would be considered enforceable. There appear to be no controls over what would happen if residents living in the proposed development started working again on a full-time or part-time basis or if a person of below the age of 55 can live there with their partner who meets the relevant criteria. It is therefore very difficult to foresee if a breach could be easily detected and what reasonable course of action could be taken to address a breach. The required condition is different to setting appropriate conditions for assisted living or care home schemes, where the development would be clearly



geared towards the requirements of people in need of care or assisted living; However, in respect to the proposed no alterations are proposed, upon the basis that the target market are considered to be active.

Paragraph 206 in the NPPF clearly states that “planning conditions should only be imposed where they are necessary; relevant to planning and to the development to be permitted; enforceable; precise and reasonable in all other respects.” The six tests must all be satisfied each time. In this instance officers are not convinced that the proposed condition would meet all the tests, specifically in respect to being reasonable and enforceable, in the context of this specific proposal. This view has been supported by a member of the Council’s enforcement team.

However, based upon these concerns the applicant has suggested the original condition replaced by the following 2 conditions:

1. Each unit of the development hereby permitted shall be occupied only as either:
  - a) Tourist accommodation, which is not the occupier/s’ primary place of residence; or
  - b) By persons aged 55 or over who are not in any paid employment;
  - c) By persons living as part of a single household with persons falling into (b) above; or
  - d) By persons who were living as part of a single household with persons falling into (b) above, who have since died.
2. Prior to commencement of the development hereby permitted, a written register of the names and main home addresses of the occupiers of each unit shall be submitted to the Local Planning Authority. The register shall, thereafter: be maintained in accordance with the details in the applicant’s Occupancy Management Statement (OMS) dated 21st August 2014 and; made available to the Local Planning Authority following a written request in accordance with the provisions set out within the OMS.

These conditions have been considered by the Council’s enforcement team who have confirmed that these would meet the tests of paragraph 206 of the NPPF and paragraph 005 of the Nation Planning Policy Guidance. Accordingly, the Council does not seek to refuse the application on this basis

#### Affordable Housing

The Council’s New Housing Team have stated that they would require an affordable housing contribution should the application be approved. Policy H6 of the NWLP requires that negotiations by the Council will be on the basis of about 50 per cent of the dwellings permitted being subsidised with an additional proportion being low cost housing, subject to the local need and site characteristics. In this context it should be noted that the Council has undertaken further viability work to support Core Policy 43 (Providing Affordable Homes) in the eWCS. The policy requires an affordable housing contribution as follows:

*“On sites of 5 or more dwellings, affordable housing provision of at least 30% (net) will be provided within the ‘30% affordable housing zone’ and at least 40% (net) will be provided on sites within the ‘40% affordable housing zone. Only in exceptional circumstances, where it can be proven that on-site delivery is not possible, will a commuted sum be considered.”*

The area outside Royal Wootton Bassett falls within the 40 per cent affordable housing zone. Currently, the proposal includes no provision for affordable housing on site nor has it been agreed that the applicant would accept an offsite contribution to affordable housing through the signing of a section 106 agreement and as such cannot be supported. However, further details of the likely

offsite requirement are to be submitted to the applicant based upon which they will confirm if they would be happy to accept a contribution. This will be dealt with as a late item.

## **10. Conclusion**

On balance, this development proposal by way of variation of condition cannot be supported as it would constitute unsustainable development in the open countryside in the context of the NWLP, eWCS and the NPPF. In general, the provision of specialist accommodation for the elderly is welcomed; However, this proposal is considered to be contrary to the requirements of Core Policy 46 of the eWCS which requires such development to be in suitable locations and assist older people to live securely and independently within their communities. In addition to which the proposed condition to restrict residential development to only retirement accommodation is considered to fail the tests set out in the NPPF. Finally, the development would be required to provide a contribution in respect to affordable housing which has not been met by this proposal.

## **RECOMMENDATION**

Planning Permission be REFUSED for the variation of condition as it applies to the 32 existing lodges for the following reasons:

1. The proposed development would constitute unsustainable development in this location. The proposal is therefore contrary to Policy H4 of NWLP, Core Policy 2 and 46 of the eWCS and paragraphs 7, 17, 50 and 55 of the NPPF.
2. Insufficient information has been submitted to demonstrate that the permitted use of the holiday let lodges is unviable and that the proposed variation to occupancy of the lodges is necessary. The proposal is contrary to CP46 of the eWCS and paragraph 47 and 54 of the NPPF.
3. The proposal would result in an intensification of the residential activity at the site with additional related residential paraphernalia resulting in harm to the visual appearance and open character of the locality contrary to policies C3 and NE15 of the NWLP, CP51 and CP57 of the eWCS and paragraph 17 of the NPPF.
4. The proposal does not provide any form of affordable housing contribution. The proposal is therefore contrary to Policy H6 of the NWLP, Core Policy 43 of the eWCS and paragraph 47, 50 and 54 of the NPPF.

Planning Permission be REFUSED for the variation of condition as it applies to the 44 lodges yet to be constructed for the following reasons:

1. The proposed development would constitute unsustainable development in the open countryside. The proposal is therefore contrary to Policy H4 of the NWLP, Core Policy 2 and 46 of the eWCS and paragraph 7, 17, 50 and 55 of the NPPF.
2. The proposed development is in an isolated location remote from a range of services and being in not sufficiently served by public transport. The proposal is therefore contrary to Policy T1 of the NWLP, Core Policy 60 of the eWCS and paragraphs 32 and 55 of the NPPF, which seek to reduce reliance on the private car.
3. It has not been sufficiently demonstrated that there is a specific need for the development in this location. The proposal is therefore contrary to 46 of the eWCS and paragraph 47 and 54 of the NPPF.

4. The proposal would result in an intensification of the residential activity at the site with additional related residential paraphernalia resulting in harm to the visual appearance and open character of the locality contrary to policies C3 and NE15 of the NWLP, CP51 and CP57 of the eWCS and paragraph 17 of the NPPF.
5. The proposal does not provide any form of affordable housing contribution. The proposal is therefore contrary to Policy H6 of the NWLP, Core Policy 43 of the eWCS and paragraph 47, 50 and 54 of the NPPF.

**Background Documents Used in the  
Preparation of this Report:**

Application Submission and further revisions and additional information  
National Planning Policy Framework  
Planning Practice Guidance  
Emerging Wiltshire Core Strategy (Submission Draft As proposed to be amended) April 2014  
North Wiltshire Local Plan

