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| APPLICATION NO. | 20/02385/FULLS |
| APPLICATION TYPE | FULL APPLICATION - SOUTH |
| REGISTERED | 11.12.2020 |
| APPLICANT | Mr G Billett, DHI Limited |
| SITE | Hill Farm Caravan Park, Branches Lane, Sherfield English, SO51 6FH, SHERFIELD ENGLISH |
| PROPOSAL | Use land for the siting of holiday lodges (static caravans), access and parking, landscape planting and associated infrastructure; to replace existing touring caravan, camping pitches and caravan storage areas |
| AMENDMENTS | Received on 08.10.2021, 02.11.2021 and 19.07.2022: <ul style="list-style-type: none">• Additional information to inform Appropriate Assessment Received on 09.02.2021 and 14.06.2021: <ul style="list-style-type: none">• Additional landscape plans Received on 11.12.2020, 18.12.2020, 11.01.2021, 12.01.2021: <ul style="list-style-type: none">• Additional and amended supporting information relating to onsite ecology and drainage matters Received on 11.12.2020: <ul style="list-style-type: none">• Heritage statement |
| CASE OFFICER | Graham Melton |

Background paper (Local Government Act 1972 Section 100D)

[Click here to view application](#)

1.0 INTRODUCTION

1.1 The application is presented to Southern Area Planning Committee at the request of a local ward member because the application raises issues of more than local public interest.

2.0 SITE LOCATION AND DESCRIPTION

2.1 The application site is an existing camping and caravan site known as Hill Farm Caravan Park, located on the east side of Branches Lane at the junction with and to the southern side of Doctors Hill.

2.2 The application site measures approximately 5ha in total and comprises the main pitch areas known as The Pines and The Hawthorns at the entrance to the application site. The existing overflow pitch area known as The Willows and caravan storage areas are located in the centre and to the rear (east).

2.3 The application site is currently subject to a number of restrictions on the type and frequency of occupancy as established under application reference 11/00308/OBLS. A summary of the existing legal obligations is set out in paragraph 4.1.

3.0 PROPOSAL

- 3.1 The proposal is to change the use of the existing touring caravan, camping pitches and caravan storage areas to be used for the siting of 80 holiday lodges. In addition the land allocated for the siting of the 80 lodges also includes in part the existing recreation space in the centre of the wider application site.
- 3.2 In association with the proposed change of use of the land, additional internal access tracks and parking areas are proposed to be installed onsite. Furthermore, the proposed scheme includes additional soft landscape planting onsite.
- 3.3 The lodges themselves are not included within the scope of the proposal on the basis that the lodges qualify as a caravan under the Caravan Sites and Control of Development Act (1960), with the definition of 'caravan' within this legislation set out as follows:

“caravan” means any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer) and any motor vehicle so designed or adapted, but does not include—

- (a) any railway rolling stock which is for the time being on rails forming part of a railway system, or*
- (b) any tent;*

Section 13 (1) of the Caravan Sites Act (1968) expanded upon this definition in relation to twin-unit caravans, set out as follows:

- (1) A structure designed or adapted for human habitation which—*
- (a) is composed of not more than two sections separately constructed and designed to be assembled on a site by means of bolts, clamps or other devices; and*
 - (b) is, when assembled, physically capable of being moved by road from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer), shall not be treated as not being (or as not having been) a caravan within the meaning of Part I of the Caravan Sites and Control of Development Act 1960 by reason only that it cannot lawfully be so moved on a highway road when assembled.*
- (2) For the purposes of Part I of the Caravan Sites and Control of Development Act 1960, the expression “caravan” shall not include a structure designed or adapted for human habitation which falls within paragraphs (a) and (b) of the foregoing subsection if its dimensions when assembled exceed any of the following limits, namely—*
- (a) length (exclusive of any drawbar): 65.616 feet (20 metres);*
 - (b) width: 22.309 feet (6.8 metres);*
 - (c) overall height of living accommodation (measured internally from the floor at the lowest level to the ceiling at the highest level): 10.006 feet (3.05 metres).*

As such, only indicative floor plans and elevations have been provided with the application.

4.0 HISTORY

4.1 **11/00308/OBLS** – Modification of legal agreement. *Modify Planning Obligation, decision issued on 18 December 2017.*

This legal agreement consolidated the previous planning history to impose the following limitations on the application site:

- Define 'Camping Units' as per the 2003 Agreement.
- The Pines:
 - Maximum of 45 Camping Units
 - Maximum of 28 Consecutive Days
 - Except 5 Units that can remain on the site throughout the season
 - The season being 01/03 – 31/10 in any calendar year.
- The Hawthorns:
 - Maximum of 55 Camping Units
 - Maximum of 28 Consecutive Days
 - 8 pitches for disabled guest use
 - The season being 01/03 – 31/10 in any calendar year.
- The Pines and Hawthorns to be combined as the "Touring Park".
- The Wardens Caravan to be occupied only by a person(s) engaged in supervising activities on the land.
- Holiday Park Units 2, 3 and 4 shall not be occupied between 01/01 – 31/01 in any one calendar year.
- Holiday Park Units 5, 6, 7 shall not be occupied between 01/02 – 28/02 in any one calendar year.
- Holiday Park Units 2-7 to be used for holiday accommodation only.
- Holiday Park Unit 8 to be occupied by the Site Owner on a permanent basis.
- Holiday Park Unit 1 to be occupied on a permanent basis by Sue Smith for her lifetime or until such time as she vacates the property.
- On the cessation of Sue Smith's occupation the caravan shall revert back to holiday accommodation only and shall not be occupied between 01/01 – 31/01 in any one calendar year.
- The Poplars as defined on the submitted plan shall be used for the storage of up to 30 Caravans.
- There shall be no occupation of the stored caravans in the Poplars Storage Area.
- The Existing Storage Areas shall be retained as per the terms of the 1996 Agreement and planning permission 06/02397/FULLS.
- The Willows shall be bound by the terms of the 1983 Agreement.
- Discharge the obligations in previous agreements.

- 4.2 **15/00997/FULLS** - Single storey wellbeing studio for the use of visitors staying overnight on the park and 10 space car park (amended description). *Permission subject to conditions and notes, decision issued on 09.12.2015.*
- 4.3 **16/01128/VARS** - Vary condition 7 of 15/00997/FULLS (Single storey wellbeing studio for the use of visitors staying overnight on the park and 10 space car park) to allow use by members and customers staying on Park for pre-booked classes and treatments. *Permission subject to conditions and notes, decision issued on 11.07.2016.*
- 4.4 **17/01463/FULLS** - Construction of 4 dog kennels with runs and communal exercise area and separate reception/dog grooming building. The erection of 2 buildings for the storage of plant and machinery. *Permission subject to conditions and notes, decision issued on 28.03.2018.*
- 4.5 **17/02869/VARS** - Remove conditions 3 and 4 of 15/00997/FULLS (Single storey wellbeing studio for the use of visitors staying overnight on the park and 10 space car park) tree protection fencing to be erected and maintained for the duration of works. *Permission subject to conditions and notes, decision issued on 02.02.2018.*
- 4.6 **18/01809/FULLS** - Removal of existing managers accommodation and provision of replacement unit in new location with existing area to provide additional parking. *Permission subject to conditions and notes, decision issued on 21.09.2018.*

5.0 **CONSULTATIONS**

5.1 **Ecology** – Comment (summarised).

- Following previous ecological comments raised on the 20.11.2020, an revised Preliminary Ecological Assessment (Arbtech, November 2020) has been submitted, which now includes information regarding the protected sites and habitats within and adjacent to the site
- While protected sites (SINC) have been identified, no impacts or mitigation measures have been outlined, particularly regarding ongoing management of recreational pressure, and impacts during the construction phase outlined within the previous ecological response
- Advise that that the likely impacts and from recreational pressure and during the construction phase of the development is included within the report, as well as suitable mitigation measures.

5.2 **Economic Development** – No objection (summarised).

- Strongly support the application to replace 143 touring caravan, camping pitches and caravan storage pitches with 80 high specification timber style holiday lodges on grounds that this major investment will
 1. ensure the long term viability of a very well-established Test Valley tourism facility by enabling it to evolve from slightly dated caravan park operating in Summer to a holiday lodge park open all year round;

2. meet growing customer expectations for higher quality accommodation noting that demand for the touring caravan market is falling by 5-10% p.a.;
 3. secure the viability of the Post Office, shop and well-being centre which are used by the local community as well as customers;
 4. significantly increase visitor spend which will support local businesses both through the park's supply chain as well as customers expenditure in local facilities etc;
 5. provide a further 5 FTE jobs on top of the 8 full time and 8 part time jobs; and
 6. make a significant contribution to the recovery of the hospitality sector in Test Valley from the Pandemic and recession.
- This evolution in the form, reflects other parts of the hospitality sector, such as the need for visitor accommodation for rural pub will also position Hill Farm to meet the growing domestic staycation market and contribute to Test Valley's vibrant visitor economy.

5.3 Environment Agency – No objection (summarised).

- No objection but advise the applicant that an environmental permit may be required for this site

5.4 Environmental Protection – No comment.

5.5 Highways – No objection subject to conditions.

5.6 Landscape – Comment (following the receipt of additional information, summarised as follows):

- Additional information has been submitted including a new planting plan.
- The planting plan appears the same as previously proposed, however the lodges are now slightly off set and have been moved further away from the hedgerow and into the site
- It is noted that *Ulmus procera* is proposed as part of the mix, if this species is proposed as hedgerow species and will be regularly clipped it will be fine to keep in the mix, however if the intention is to establish these spaces as a tree, it should be replaced for a similar species such as Hornbeam which is more disease resistant.
- Whilst the hedgerow/tree belt species are deemed acceptable and could provide a level of mitigation along the frontage; the proximity of the lodges is still close to the boundary planting, in some cases still butting up against one another.
- This is likely to cause future conflict, particularly when the larger tree species become established.

- The Landscaping Plan states that ‘All trees are to be planted as shown ensuring a minimum of 5 metres from buildings and 3 metres from drainage and services’.
- Whilst the plan is not to a registered scale, it would appear that some of the species shown are closer than the 5m to the buildings.

5.7 **Local Lead Flood Authority** – No objection subject to conditions.

5.8 **Natural England** – No objection (following the receipt of amended Appropriate Assessment, response summarised as follows):

- Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impact on designated sites and has no objection.
- Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on the Solent and Southampton Water SPA and the Solent Maritime Special Area of Conservation in addition to the New Forest SPA, SAC and Ramsar site, and has no objection to the proposed development.
- To meet the requirements of the Habitats Regulations, it is advised to record the decision that a likely significant effect can be ruled out.
- The following may provide a suitable justification for that decision:
 - The proposed development will not result in a net increase in population at the application site.
 - Land use change has been accounted for in the nutrient budget dated 9th August 2022 which calculates the proposed development will result in a net reduction in Total Nitrogen discharging into the Solent designated sites.

5.9 **Planning Policy** – No objection (summarised).

Principle of development

- Policy COM2: Settlement Hierarchy – the site lies outside the boundaries of settlement and is therefore within the countryside. Development outside of settlement boundaries will be permitted if a) it is a type appropriate according to RLP policy or b) it is essential to be located in the countryside.
- Policy LE18: Tourism - this application seeks to replace existing caravan and camping pitches and caravan storage with new timber style holiday lodges
- It is determined that the criteria set out within policy LE18 have been met
- The only reference to visual impact within this policy is concerned with seasonal structures related to tourism, such as marquees.
- Such structures should be temporary in nature and not have an adverse impact on the landscape.

- There is no other mention of landscape impact within this tourism policy and as this proposal is within the boundary of a site where permission for tourist accommodation is already in place visual and landscape impacts will be considered under Policy E2.
- Policy COM14: Community Services and Facilities - the applicant states that the existing shop and post office on site are heavily reliant on the existing tourist facility, but that in its current state the business is seasonal and these community facilities are impacted by decreased custom in the low season.
- By replacing the existing caravan and camping pitches with timber holiday lodges more suited to year round use the applicant believes there would be considerable benefits including maintaining these community services.

Impact on the character and appearance of the area

- Policies E1 and E2 are applicable, suggest consultation with Landscape officers

Ecology

- Policies E5 and E6 are applicable, consideration of the impact on designated sites needs to be undertaken
- SINCS: Site Of Important Nature Conservation - SU30102320 is located within the site boundary although the plans show that this land is to remain undeveloped

5.10 **Southern Water** – Comment (summarised).

- The Environment Agency should be consulted directly by the applicant regarding the use of a private wastewater treatment works which disposes of effluent to sub-soil irrigation.
- The Council's Building Control officers or technical staff should be asked to comment on the adequacy of soakaways to dispose of surface water from the proposed development.
- It is possible that a sewer now deemed to be public could be crossing the development site.
- Therefore, should any sewer be found during construction works, an investigation of the sewer will be required to ascertain its ownership before any further works commence on site.

5.11 **Trees** – No objection subject to conditions.

6.0 **REPRESENTATIONS** Expired 14.02.2022

6.1 **Sherfield English Parish Council** – Objection (Points raised over separate responses, summarised below):

- Object to the proposal, the amended information has no material effect on the original concerns and therefore the original objection still stands.
- Whilst the parish council want to support rural businesses and local families, the application as it stands cannot be supported for the following reasons:

1. The proposed scale and density were considered over-development for a site within the countryside.
2. Concerns regarding the change of occupation from 8 months to a year were raised due to the potential for cabins to become second homes rather than for tourism use; 12 month occupation of the cabins would be considered unacceptable – an opinion shared by all councillor and parishioners present at the meeting.
3. Screening was not considered adequate within the proposal, both from a privacy point of view to the neighbours and to effectively negate any environmental issues.
4. Light pollution from the site may be unacceptable due to the larger windows on the cabins but also the additional roof lights.
5. The apparent loss of green space on the plan, especially on the southern boundary.
6. The proposal is contrary to the draft Neighbourhood Development Plan which details small pockets of houses over several years. A proposal for 80 cabins far exceeds this.

6.2 **56 representations from various addresses** – Objection (summarised).

Principle of development

- As a point of law, Policy LE18 can hardly be interpreted such that an existing planning permission for camping pitches implies outline planning approval for any other tourism related accommodation including permanent housing such as Chalet Bungalows or a hotel at whatever scale.
- Planning Policy officer's comments in relation to Policy LE18 are a remarkably generous reading of the policy.
- The proposed development will negatively impact on tourism as the lodges offer a greater range of living accommodation and will result in less spending on local facilities.
- There is insufficient infrastructure within the surrounding area to support the proposed development.
- The proposal will create a future social problem and will negatively impact the social cohesion of the local community.
- The proposed lodges will be more visually prominent and therefore contrary to Policy LE18 criteria.
- The application has not been accompanied by a viability statement as required by Policy LE18 criteria.
- Contrary to Policy LE16.
- Need has not been justified, a similar development at Green Hill Farm, Landford has not been occupied.
- Assertion that demand for touring caravans and tent pitches is being reduced, is contrary to the assertion in previous applications and industry data.
- Viability of the proposal has not been justified.
- Unsustainable location reliant on travel by car.
- Need, NPPF, Local Plan, Supplementary Planning Documents.

Impact on the character and appearance of the area

- Design, materials, over development, character of area, trees
- It should be noted here that the proposed 80 bungalows on some five acres compares to little more than 200 households widely dispersed across the whole Parish.
- Therefore, the proposed development is disproportionately large.
- The application site is not very well screened and does not blend into its surroundings.
- Would support a well laid out site with attractive Lodges but feel that 80 such lodges would probably be excessive, this would alter the character of this rural area in a detrimental way.
- Proposed 80 lodges represents a significant over development in the context of the existing dwellings within Sherfield English.
- Neighbourhood Development Plan group object to the development as the proposal is overdevelopment, would welcome an application to change one zone of the application site.
- The Village Design Statement identifies that the settlement pattern of the village is widely dispersed, the proposed development runs directly counter to this guidance.
- Contrary to guidance notes no's 1, 2, 3 and 6 of the Sherfield English Village Design Statement.

Landscape

- The RPS LVA has not been able to consider winter visibility, and has underestimated the extent to which visibility of the proposed lodges would be greater in the winter.
- It has further understated the likely visibility of the development by failing to consider those areas with the clearest views of it, along Branches Lane as it passes the site.
- The LVA does not appear to have given any real weight to the significant tree loss which the development which involve.
- The LVA has overstated the effects and benefits of the proposed mitigation – the Landscape Masterplan clearly shows that this would be a very dense form of development with a narrow band of planting only along its western boundary and with little open space left within the site.
- The RPS LVA has completely ignored the VDS, which includes important and relevant information about the value placed on the character of the village and the dispersed settlement pattern, which the proposals would conflict with.
- Finally, the LVA has failed to properly consider the inappropriateness of the scale and density of the proposed development, and the difference in nature between a permanent, built development of tightly packed lodges and the existing seasonal use by caravans.
- Reviewing the proposed landscaping plan and specification which pays lip service to planning requirements.
- The standards of maintenance, tree care and planting of the present site are inadequate and clearly trees and planting are seen as a waste of space.

- The currently proposed specification is inadequate and impossible to implement.
- The plant specifications and overall plan will not provide the screening and buffer required to soften the impact of a development of this scale.
- Lodges will result in greater visual intrusion due to increased dimensions in comparison to existing use by caravans and tents.
- Insufficient spacing between pitches, particularly in the context of the impact of Covid on requirements for living conditions.
- Insufficient screening, suggest a reduction in pitches.
- The submitted arbtech survey is inaccurate as the layout of the boundary fence with Pound Farm is wrong and includes some of the planting on the Pound Farm side of the fence.
- Proposed landscaping should be required prior to the proposed lodges being brought onto the application site.

Trees

- It is noted that current onsite development has encroached into tree protection areas.
- A lower density will ensure that the woodland is protected as well as local biodiversity.

Ecology

Onsite impacts

- Effect of noise and light pollution will have a significant effect on onsite wildlife and biodiversity.
- No reference to wetland and wildlife copse with a large pond on the adjoining land forming part of Pound Farm.
- Currently a very dark site at night and the proposed lodges have skylights in them – closing the site over winter would prevent this.
- External lighting should be Passive Infrared detectors only as recommended in the ecology report.
- Proposed development will negatively impact a bat colony previous identified within the roof space of March End resulting from all year round light spill and external lighting.
- A significant reduction in greenspace onsite with habitat and biodiversity implications.
- Confirm sightings of many priority species, such as a variety of bat species, deer, grass snakes, badgers, slow worms and Song Thrushes.
- Lodges will increase the proximity of lighting adjacent to the SINC.
- Proposal will result in the development of existing greenfield amenity land.
- There should be no skylights within the proposed lodges.
- Proposal does not include many of the recommended biodiversity enhancements within the submitted survey report.
- No Ecological Construction Method Statement or Ecological Management Plan has been provided as requested by the Ecologist.

Offsite impacts

- The submitted drawings for the lodges indicate a total of 240 double rooms spread across 80 chalets for year-round occupation, compared with 100 camping or caravan pitches only fully occupied on a peak bank-holiday weekend.
- This is a huge increase in local population, suggesting more than double the number of occupiers and all year-round against the current peak summer holiday occupancy.
- The applicants figures have are clearly wrong and the figures have not been subject to external review.
- Applicant's assertion that the proposal is site neutral is incorrect, the proposed development will result in a 57% increase of visitor nights at the site.
- Calculation shows that site neutral figure would be 51 lodges.
- Disagree that with the assertion that the proposed will result in a site neutral impact, the proposal will generate an intensification of the use with a detrimental environmental impact.
- Do not understand how the proposal can be allowed with the current nitrate issue, all waste will have to be correctly filtered before reaching the Blackwater.
- Appropriate Assessments undertaken by TVBC are flawed in omitting reference to Mottisfont Bats SAC, and relying on incorrect and inappropriate data sources for occupancy rates and water usage.
- The use of 2.5 occupancy figures for the proposed lodges as used in the Appropriate Assessment is derived from an extremely small data source – perhaps only 1 static unit.
- The existing static caravans are older, smaller and dissimilar in character to the proposed 3 bed lodges.
- It is illogical to use a higher figure for existing accommodation than the proposed lodges.
- Similar application at Landford has reported an occupancy figure of 4 people per lodge.
- Alternative data sources, including tourism surveys, water industry standards for water usage demonstrate that the proposal would result in an increase in visitor population.
- TVBC figures that the proposal will result in less visitors undermines the business case for the proposed development and is undermined by local knowledge of how the site has operated previously.
- No discussion or comment from TVBC on why the data provided by residents has not been used or fully referenced when it represents a more precautionary and robust approach.
- Horrified by Natural England's no objection as the figures are incorrect and a public enquiry must be held.

Water Management

- Increase in demand for water usage and impact on local water supply.
- Impact of climate change and increase in hardstanding of 1.2 hectares will stress the local environment and it is likely that the existing infrastructure cannot cope.

- Recycling of rain and grey water should be incorporated into the design.
- Details of the surface water drainage method for the lodge pitches and parking areas should be provided.

Impact on the general amenity of the area

- Noise.
- Light Pollution from occupation during winter months and at night.
- Fire risk during summer from barbeques.
- Odour, rats, hygiene, own biosecurity and the danger of rotary grass cutters operating in the adjoining field, there should be no occupation within 20-30 yards of the adjoining Pound Farm.
- Previous issues with leaking sewerage, current infrastructure will not be able to cope.
- No mains drainage or gas supply
- Site layout does not account for the risk and impact of a Covid outbreak onsite.

Heritage

- Impact on the Grade II listed properties and particularly Martins Roost has not been accounted for and there is insufficient planting proposed on the boundaries of the application site to protect an adverse impact.

Impact on the amenity of residential property

- Overlooking
- Proximity of lodges to the adjoining field forming part of Pound Farm, considerable concerns over positioning of pitches so close to boundary fence.

Highways

- Any development at the scale proposed should require improvements to the surrounding roads as there is currently insufficient room for vehicles to pass easily either in Branches Lane between Pound Farm and the crossroads on the A27 to the South or on the bends round North Common to the North.
- Branches Lane already carries many pedestrians between the application site down towards the Garden Centre, Pub, Garage and Village Hall.
- A footpath or pavement along Branches Lane will be necessary.
- Consider that the proposed parking provision is insufficient and should be increased to prevent overspill onto Branches Lane or Doctors Hill.
- There are no highways contributions.
- Traffic generation, parking and safety.

Crime and community safety

- Crime and community safety

Conditions

- Essential that any planning permission contains enforceable conditions to prevent year round occupation.

- The lodges will be sold and therefore it will not be possible to enforce any planning conditions imposed.
- Similar proposal at Winchester Golf Club was granted at appeal with a condition imposed limiting occupation of individual units to a maximum period of 4 weeks for a maximum of 3 occasions per year.
- This condition should be applied to the current proposal.
- Consider that the proposal should be subject to the same seasonal restrictions that are currently in place.
- Consider that the LPA should enforce current restrictions to the underdeveloped pitches during the implementation phase to preserve the current status quo.
- At what point will the permission be activated?
- When will the onsite storage and caravan sales business be removed from site?
- At what point will the existing permission for 100 touring unit and 43 tent units become invalid?

Other matters

- The lodges do not qualify as caravans as defined under the caravan act and therefore, the application is fundamentally flawed and misleading.
- As the lodges do not qualify as caravans under the caravan act then the application site cannot be controlled through the site licencing process as the planning agent asserts.
- Believe the application is part of a long term plan to change the application site to permanent housing.
- Correspondence from the agent confirms that the lodges will be permanent housing.
- Correspondence from planning agent indicates that conditions would not be enforced, applicant has not previously complied with planning restrictions or conditions.
- Any permission should include detailed design of the proposed lodges.
- Submitted drawings include an existing onsite building that represents a current breach of planning control.
- Example at King Edward Mobile Home Park demonstrate that the lodges constitute permanent housing.
- A similar situation to that which occurred at Romsey Brewery whereby the development is commenced but not completed as it is improbable that 80 bungalows would be sold.
- Dangerous to use the village shop and post office as a bargaining tool, it would not be used as often by occupants of the proposed lodges.
- Fear for the future and what would come next.
- Previous planning decisions.
- Inconsistency of decision making, TVBC will not allow a single dwelling to be built in Sherfield English, the application should be refused.
- Applications for the bungalows in tranches of 20 would retain some control of its character and environment which is after all classified as countryside.
- There is no public open space contribution.

6.3 11 letters in total from various addresses – Support (summarised).

- Constantly suffer from a lack or reduction of local services that residents need, many times this is because independent small businesses find it difficult to remain financially viable.
- As such the application site and all its associated essential services, grocery shopping, café and wellbeing centre support the local community as well as its visitors.
- At a time when the rural economy is under so much pressure, surely refusing this application could possibly undermine the viability of the very services relied on by the local community.
- Enable the continued provision of community support.
- Provide much needed employment opportunities and greater consistency of visitor revenue throughout the year.
- Aesthetically, believe the lodges will be a significant improvement on the current multi style and colour caravans and awnings.
- Do not believe that there would be any great difference in vehicle movements.
- In fact benefit could arise from less larger vehicles using the local road network.
- Design, materials, character of the area and need.

6.4 2 letters on behalf of the occupants of Hill Side Farm – Comment (summarised).

- The north and north east boundary position is incorrect and includes land owned by Doctors Hill Farm.
- The Gas storage (NE) facility has been sited on land owned by Doctors Hill Farm.
- Support for the application is subject to the application site remaining as a 'family' site.

Case officer note: Since the receipt of the above representation, an amended site location plan excluding third party land was submitted and a new statutory publicity exercise was undertaken. The following comment was received in response:

- This amendment overcomes our previous concerns.

6.5 1 letter from the Romsey and District Society (Planning Committee) – Comment (summarised).

- Wish to state that the usage should remain as holiday cottages and not be allowed to become permanent residential occupation.
- Occupation should be taken to improve the landscaping on the boundaries.

7.0 **POLICY**

7.1 Government Guidance

National Planning Policy Framework (NPPF)
National Planning Practice Guidance (NPPG)

7.2 Test Valley Borough Revised Local Plan (2016) (TVBRLP)

Policy SD1: Presumption in Favour Sustainable Development
Policy COM2: Settlement Hierarchy
Policy COM14: Community Services and Facilities
Policy LE18: Tourism
Policy E1: High Quality Development in the Borough
Policy E2: Protect, Conserve and Enhance the Landscape Character of the Borough
Policy E5: Biodiversity
Policy E6: Green Infrastructure
Policy E7: Water Management
Policy E8: Pollution
Policy E9: Heritage
Policy LHW4: Amenity
Policy T1: Managing Movement
Policy T2: Parking Standards
Policy CS1: Community Safety

7.3 Neighbourhood Plan

Draft Sheffield English Neighbourhood Plan

Case officer comment: The Sheffield English Neighbourhood Plan has not yet at the time of writing progressed to public consultation on draft policies and therefore, cannot be afforded any significant weight in the assessment of this planning application.

7.4 Supplementary Planning Documents (SPD)

Sheffield English Village Design Statement (2015)

8.0 **PLANNING CONSIDERATIONS**

8.1 The main planning considerations are:

- Principle of development
- Impact on the character and appearance of the area
- Ecology
- Water Management
- Impact on the general amenity of the area
- Heritage
- Impact on the amenity of residential property
- Highways
- Crime and community safety
- Conditions
- Other Matters

8.2 Principle of development

Policy COM2 of the TVBRLP states that development outside the boundaries of settlements will only be permitted if:

- a) *It is appropriate in the countryside as set out in the RLP Policy COM8 – COM14, LE10, LE16 – LE18; or*
- b) *It is essential for the proposal to be located in the countryside*

8.3 Policy LE18

Policy LE18 is one of the policy exceptions listed under criterion (a) of Policy COM2 and relates to tourism development, stating as follows:

Proposals for tourist development will be permitted provided that:

- a) *the proposal is located within a settlement; or*
- b) *where the proposal is located within the countryside:*
 - i) *it utilises an existing building and meets the requirements of policy LE16; and*
 - ii) *any extension or new buildings form part of an existing tourist facility; and*
 - iii) *in the case of seasonal structures these are temporary in nature and do not have an adverse impact on the landscape; and*
 - iv) *in the case of touring caravans and camping sites these are not prominent in the landscape.*

Proposals which involve the loss of serviced accommodation (Class C1) and non-serviced tourist accommodation, including caravan and camping sites, will only be permitted provided that it can be demonstrated that the existing living accommodation unit is no longer economically viable or required.

8.4 Criterion (b) (i) and (ii)

In this instance, the application site is located within land designated as countryside and therefore, criterion (b) of Policy LE18 is applicable. The proposed development does not comprise the erection of buildings and is limited to a change of use of the land with associated landscaping works. As a result, criterion (b) (i) and (ii) are not applicable in this instance.

8.5 Criterion (b) (iii)

As set out in paragraph 3.3 above, the lodges themselves do not form part of the planning application. In addition, the supporting statements submitted with the application assert that the proposed change of use will enable the use of lodges all year round rather than on a seasonal basis. The Planning Policy Officer has commented that criterion (b) (iii) is limited to those proposals including seasonal structures such as marquees. Consequently, it is not considered criterion (b) (iii) is applicable in this instance.

8.6 *Criterion (b) (iv)*

The proposed lodge pitch locations are predominantly positioned within the existing pitch and caravan storage areas with a modest incursion onto land currently in use as the recreational space of the application site. All of the pitches are located within the wider caravan park that constitutes an existing tourism site. Following the assessment undertaken below in the section titled 'Impact on the character and appearance of the area', it is not considered that the proposed development will result in any visual intrusion or undue prominence within the wider landscape. Consequently, it is considered that the proposal complies with criterion (b) (iv).

8.7 *Loss of accommodation*

Third party representations have referred to the final paragraph of Policy LE18 and the absence of any viability assessment in response to the anticipated total reduction in pitches and overall visitor numbers as set out in the Appropriate Assessment. However, it is clear that this policy requirement is only triggered in the event that the proposed development results in the total loss of an existing tourism facility, rather than the redevelopment of an existing facility which is the case in this instance. Therefore, it is not considered necessary for evidence to be provided to demonstrate that the existing operation is no longer viable or needed.

8.8 *Conclusion on Policy LE18*

Following the assessment undertaken above, it is considered that the proposed scheme complies with the requirements of criterion (b) of Policy LE18 and therefore, is in accordance with the Policy as a whole.

8.9 Policy COM14

The submitted information also refers to Policy COM14 in the context of the existing shop and post office onsite and their use by the wider community. However Policy COM14 is only applicable in the instance that the development proposed will result in the loss of existing facilities and the proposed masterplan demonstrates that the existing shop and post office will be retained onsite. As a result, it is not considered that Policy COM14 is applicable in this instance.

8.10 Policy LE16

Third party representations have raised concern that the proposed development does not comply with Policy LE16 but it is not necessary for the proposal to comply with more than one policy exception to be considered acceptable in principle.

8.11 Need and sustainability

Objections have been raised on the basis that the need for the amount and type of accommodation that the pitches provide for has not been demonstrated and is unlikely to be required given the experiences of other similar sites within the locality. However, it is not necessary to make the proposal acceptable in planning terms for the need or viability of the proposed development to be demonstrated.

- 8.12 Furthermore, with regard to the locational sustainability of the proposed development, the application site is located within an existing, established tourism site with onsite ancillary facilities. It is therefore considered that the proposal is consistent with the principles set out in paragraph 84 of the NPPF which support the provision of sustainable rural tourism. Although the supporting information provided by the applicant in relation to the potential creation of additional jobs is noted, given the compliance with the relevant planning policy set out above, the conclusion on the acceptability of the proposal in principle does not rely on the delivery of the reported employment levels.
- 8.13 Third party representations have also commented that the proposed development will result in a negative impact on the social cohesion of the local community and create a future social problem. However, given that the proposed development is solely limited to the redevelopment of an existing tourism site, it is not clear how this would be incurred or a direct consequence of granting planning permission.
- 8.14 Sherfield English Neighbourhood plan
Reference has been made within third party representations to the Sherfield English Neighbourhood Plan but this has not progressed to the formulation of a draft plan and therefore, cannot be given any significant weight in the assessment of the planning application.
- 8.15 Conclusion on the principle of development
Following the assessment undertaken above, it is concluded that the proposed scheme complies with Policy LE18 as one of the policy exceptions listed under criterion (a) of Policy COM2 of the TVBRLP. As a result, the principle of development is considered acceptable and an assessment against the other material considerations is undertaken below.
- 8.16 **Impact on the character and appearance of the area**
Design and Landscape
Policy E1 requires that the design of development is high quality and respects the character of the area, stating as follows:

Development will be permitted if it is of a high quality in terms of design and local distinctiveness. To achieve this development:

- a) should integrate, respect and complement the character of the area in which the development is located in terms of layout, appearance, scale, materials and building styles;*
- b) should not detract from the dominance of, or interrupt important views of, key landmark buildings or features;*
- c) should be laid out to provide connectivity between spaces and a positive relationship between public and private spaces; and*
- d) makes efficient use of the land whilst respecting the character of the surrounding area and neighbouring uses.*

Development will not be permitted if it is of poor design and fails to improve the character, function and quality of the area.

8.17 *Policy E2 relates to the impact of development on the wider landscape, stating as follows:*

To ensure the protection, conservation and enhancement of the landscape of the Borough development will be permitted provided that:

- a) it does not have a detrimental impact on the appearance of the immediate area and the landscape character of the area within which it is located;*
- b) it is designed and located to ensure that the health and future retention of important landscape features is not likely to be prejudiced;*
- c) the existing and proposed landscaping and landscape features enable it to positively integrate into the landscape character of the area;*
- d) arrangements for the long term management and maintenance of any existing and proposed landscaping have been made;*
- e) it conserves the landscape and scenic beauty of the New Forest National Park or the North Wessex Downs Area of Outstanding Natural Beauty where applicable; and*
- f) does not result in the loss of important local features such as trees, walls, hedges or water courses.*

8.18 In this instance, the application site is accessed by Branches Lane which runs parallel to the western boundary of the application site. Currently, the vegetation at the southern end of the application site is not as substantial or mature then the planting at the northern end of the application site. As a result, clear views into the existing site are available when travelling along Branches Lane from the south with tents and caravans visible when the pitches are in use.

8.19 It is noted that the landscape character area appraisal that covers the majority of the application site (character area no. 3B) identifies visually intrusive caravan parks as a key detractor and therefore, the existing clear views into the application site are considered visually detrimental to the existing landscape character.

8.20 From positions on Branches Lane to the north of the vehicular access point and along Doctors Hill, which runs parallel to the northern boundary of the application site, the existing vegetation serves to limit views to glimpses of the tents and caravans stationed on the land.

8.21 In support of the application, a landscape visual assessment was provided. Some local residents dispute the conclusions reached in this document and in response a landscape visual assessment was prepared on their behalf as a rebuttal to the conclusions and assertions made within the applicant's submission. The submitted assessments include a number of other vantage points, but these are limited in terms of visibility and are typically from a significant distance away from the application site. As such, it is considered that the impact of the proposal on views available from travelling along Branches Lane and Doctors Hill are the most significant to the appearance and landscape character of the area.

- 8.22 Following initial feedback to the proposed development, the proposed planting on the western boundary of the application site has been revised and strengthened. Following the amendments, the proposed planting at the southern end of the western boundary comprises several trees and a substantial belt of additional hedgerow planting. Consequently, following the initial establishment phase, it is considered that the proposed scheme contains sufficient planting to ensure that only glimpse views of the application site will be possible when travelling along Branches Lane.
- 8.23 In addition, the proposed landscaping scheme includes additional planting at the northern end of the application site and this will serve to enhance the existing vegetation at this part of the western boundary.
- 8.24 Local residents have concerns about the proposed landscaping measures with particular reference to the proposed non-native species and the impact this will have on the local character of the area. They were also of the view that the quantity of landscaping was insufficient. However, the objective of the proposed planting is to screen rather than completely obscure views of the application site from the public realm. The additional planting is considered to achieve this aim particularly following an initial establishment phase, as it comprises a continual hedgerow supplemented by individual tree planting within it. The submitted planting plan for this section of the proposed landscape planting comprises a wide range of species but includes Common Oak, Common Hawthorn and English Elm species. As such, it is considered that the proposed species mix will incorporate characteristics of the local landscape.
- 8.25 It is also noted that the Landscape Officer has commented that there may be future pressure on the proposed tree planting given the spacing and proximity of the proposed pitches. However, given that the pitches are only to be used for tourism accommodation rather than permanent residential occupation and the ability for the applicant to undertake maintenance works and adjustments to the positioning of the lodges, it is not considered that this concern justifies a basis for refusing the planning application.
- 8.26 It is likely that the lodges occupying the proposed pitches will be taller than the existing caravan and tent units but equally, it is also likely that the final finish of the lodges will be in muted tones rather than the predominantly white toned caravans. To prevent the possible appearance of a continual block of lodges positioned end to end and adjacent to Branches Lane, the proposed pitches at the western end of the application site have been arranged so that the side elevations face the public highway. This arrangement is similar to the existing layout and will ensure that there is visual separation between each lodge or unit. Furthermore, the overall pitch numbers at the western end of the application site is also comparable to the existing arrangement. Therefore, it is not considered that the density and arrangement of the proposed pitches is unacceptable.
- 8.27 Consequently, it is considered that subject to conditions securing the specification, implementation and maintenance details of the other landscape planting positioned away from the western boundary, the proposed scheme will avoid any visual intrusion within the wider landscape.

- 8.28 In relation to the appearance of the access tracks and other internal landscaping works, this will be similar in nature and appearance to that of the existing infrastructure onsite with views predominantly contained within the application site. Therefore, subject to the imposition of a condition securing the final specification details of the hard surfacing, it is considered that the design and layout of the proposal will integrate with the appearance of the existing tourism site and not serve to harm the character of the area.
- 8.29 Village Design Statement
Third party representations have drawn attention to the guidance within the Sherfield English Village Design statement (VDS) commenting that the proposal is contrary to the guidance set out as guidance notes number 1, 2, 3 and 6.
- 8.30 Guidance note 1 of the VDS identifies the parish settlement pattern as primarily comprising of dispersed hamlets and scattered dwellings. Guidance notes 2, 3 and 6 relate to the positioning of dwellings and roads in relation to one another.
- 8.31 However, the proposed scheme does not include the provision of new buildings, residential dwellings or new public highways and only comprises pitches for tourism accommodation with associated landscape works. As a result, it is not considered that the proposed development is contrary to any of the guidance contained within the VDS.
- 8.32 Trees
In support of the application, an arboricultural survey and impact assessment was submitted, assessing the condition of the existing trees onsite and the potential impact of the proposed development. The submitted assessment identified that the proposed scheme will not result in the loss of any high quality trees of public amenity value, with tree removal limited predominantly to the existing trees at the centre of the application site.
- 8.33 To achieve this outcome, pitches partially within the root protection areas of the retained trees will require a no dig construction method to avoid any accidental damage during the construction phase. Precise details of the no dig construction method have been secured through the imposition of a condition. Third party representations have raised concern that there are existing pitches located within the root protection areas of mature trees, but this is not relevant to the assessment of the current proposal.
- 8.34 To offset the loss of the existing trees, the proposed soft landscaping works on the western boundary of the application site includes replacement tree planting with details of planting and maintenance secured by the imposition of conditions.
- 8.35 Consequently, it is not considered that the proposed scheme will result in an unacceptable arboricultural impact.

8.36 Green Infrastructure

The response from the Planning Policy officer draws reference to Policy E6 of the TVBRLP which relates to the protection of areas of land such as designated ecology sites, public open space and allotments. As discussed in the section titled 'Ecology' below, it is considered that the proposal will avoid any adverse impact on designated ecology sites. Furthermore, the proposal will not result in the loss of any public open space or sites important for nature conservation. Consequently, it is considered that the application is in accordance with Policy E6 of the TVBRLP.

8.37 Conclusion on the impact on the character and appearance of the area

Following the assessment undertaken above, it is considered that the proposed development will avoid any materially significant harm to the visual and landscape character of the area as well as existing green infrastructure. Consequently, the application is in accordance with Policies E1, E2 and E6 of the TVBRLP.

8.38 **Ecology**

Onsite impacts

In support of the application, a preliminary ecological appraisal (Arbtech) has been provided and subsequently amended in response to initial comments from the Council's Ecologist. The submitted assessment identifies the conditions onsite and the potential impact on protected species and habitats, as summarised below.

8.39 *Bats*

The proposed development will not result in any tree loss within the existing woodland area (Doctors Copse SINC) located in the south-east corner or serve to remove any loss of mature trees positioned on the boundaries of the application site. As such, it is not considered that the proposed development will result in the loss of bat roosting habitats within the existing woodland areas.

8.40 As identified above in the section titled 'Trees', the proposal will result in the removal of existing trees located within the central areas of the application site, predominantly comprising of younger trees sporadically positioned through the existing informal amenity area. Any potential loss of habitat arising from the removal of these trees will be mitigated against through the provision of replacement planting and installation of bat boxes within the existing woodland areas. After reviewing the submitted information, the Ecologist raised no objection to this approach.

8.41 *Birds*

The proposed tree removal in the centre of the application has the potential to result in the loss of suitable habitat for breeding birds. To mitigate against this potential loss of habitat, it is proposed for additional bird boxes to be provided onsite and any for any onsite tree clearance works to be undertaken outside of bird breeding season.

8.42 *Dormice*

The submitted assessment identifies that as the proposed scheme will avoid the loss of any suitable existing habitat for dormice. Therefore, it is considered that the proposal will not adversely impact this protected species. No objection was raised by the ecologist to this conclusion.

8.43 *Reptiles and amphibians*

Due to current nature of the application site comprising existing pitches and managed lawn areas, it is not considered that the proposed scheme will serve to result in a loss of suitable habitat or for reptiles or amphibians.

8.44 *Conditions*

As recommended by the ecologist, a condition has been imposed securing the submission of a construction environment management plan and ecological management plan to ensure that there is no harm arising from the implementation phase of the proposed development or the subsequent operation of the application site in relation to Doctor's Copse SINC.

8.45 In addition, a condition has been imposed to secure the development is undertaken in accordance with the recommendation of the submitted ecology reports and the final specification and location details of the proposed biodiversity enhancement measures.

8.46 To ensure that any external lighting to be installed onsite does not serve to adversely impact protected species such as bats during hours of darkness or winter months, a condition has been imposed securing the submission and approval of specification details prior to installation. This will allow an assessment of whether the lighting specification follows best practice guidance on minimising the impact of lighting on areas where bats and other protected species are present.

8.47 *Third party representations*

Third party representations have raised concern that the proposed scheme will result in the reduction of the existing amenity greenspace in the centre of the application site, but the submitted ecology assessments demonstrate that this will not serve to result in an overall loss of habitats onsite for protected species.

8.48 In addition, concern has been raised in relation to the absence of any assessment of an existing wetland and wildlife copse with a pond, on land forming part of the adjoining Pound Farm holding. However, given the assessments undertaken at the application site and that the proposed development is contained within the existing tourism site, it is not considered necessary for additional survey work of this offsite feature to be undertaken. Similarly, the reported sightings of other species such as deer and slow worms are noted but it is considered that the submitted survey work and recommended enhancement measures, such as the provision of additional planting and wildflower area is sufficient, to ensure that there is no materially significant harm to those species.

- 8.49 Reference has been made to the omission of the River Test SSSI within the Appropriate Assessments undertaken however the application site is not located within the SSSI area.
- 8.50 Impact on Designated Sites: Mottisfont Bats SAC and Doctor's Copse SINC
The application site is located within the buffer zone of the Mottisfont Bats SAC. In addition, as aforementioned, the wider application site includes the Doctors Copse SINC. It has been assessed that the proposed development will remain unaffected due to the containment of the proposed development within the existing tourism site. However, there is also potential for an indirect impact through the deterioration of potential important local foraging habitat such as deciduous woodlands in proximity to water bodies and the Doctors Copse SINC qualifies as such a woodland.
- 8.51 However, with the imposition of a condition to secure and control the specification and positioning of any external lighting in conjunction with the retention of the existing mature woodland areas onsite, it is not considered that the proposal will result in any indirect harm to potential important local foraging habitat either to the Doctors Copse SINC or other mature woodlands in the locality. As a result, the proposed development will avoid any harm to the designated Mottisfont Bats SAC.
- 8.52 Offsite Impact on Designated Sites: Recreational Pressure
New Forest SPA
The proposed development is within 15km of the New Forest SPA site. In accordance with advice from Natural England and as the HRA of the Test Valley Borough Local Plan DPD, a net increase in development for overnight accommodation within 15km of the New Forest SPA site is likely to result in impacts to the integrity of those sites through a consequent increase in recreational disturbance. Since the adoption of the Local Plan, a review of the underlying evidence supporting the New Forest Interim Mitigation Strategy has been undertaken and a new Supplementary Planning Document (SPD) is currently going through public consultation. In any event, the application site is located within the buffer zone of the New Forest SPA, as identified by the interim framework and the draft SPD document.
- 8.53 Development within the identified zone that serves to increase the human population around the New Forest and thus can increase the level of recreation and disturbance of bird populations that are qualifying features of the associated SPA. The impacts of recreational disturbance (both at the site-scale and in combination with other development around the New Forest) are analogous to impacts from direct habitat loss as recreation can cause important habitat to be unavailable for use. The habitat is functionally lost, either permanently or for a defined period. Birds can be displaced by human recreational activities and use valuable resources in finding suitable areas in which to breed undisturbed. Ultimately, the impacts of recreational disturbance can be such that they affect the status and distribution of key bird species and therefore act against the stated conservation objectives of the European sites. As a result, the Local Planning Authority's Ecologist has raised this as a material consideration in the assessment of the proposed development site.

8.54 *Current Operation*

In this instance, the application site currently benefits from a number of extant planning permissions for tourist use which comprise 100 camping pitches limited to 245 days of the year in addition to 43 pitches limited to 21 days of the year. By comparison, the proposed development would result in the use of this land for the placement of 80 lodges. Although it is acknowledged that the number of units is being reduced, the proposal will result in a different type of accommodation being provided onsite and it is therefore considered necessary to review the potential impact on overall visitor numbers.

8.55 *Previous Appropriate Assessments*

Previously the Local Planning Authority (LPA) completed an appropriate assessment based on industry averages from tourism board surveys in relation to different types of accommodation. However, it is accepted that the complete reliance on tourism averages without any reference to bespoke data for the application site was open to challenge and not sufficiently robust to be considered a precautionary approach as required by the Habitats Regulations.

8.56 In response to this issue, it has been identified that an assessment based on data bespoke to the application site is more robust than the reliance on generic tourism averages and therefore, the LPA's assessment set out below is based on and informed by real life data collected from the historic operation of the application site. Subsequent to the initial Appropriate Assessment, the Local Planning Authority undertook a second Appropriate Assessment dated January 2022 based predominantly on the data from the applicant's booking system. Natural England responded on the 10th February concluding that further information was required. Following on from this response, the LPA undertook a new Appropriate Assessment dated August 2022, which in part draws on the additional analysis provided by the applicant, to respond to the points raised within Natural England's previous response.

8.57 *Available data*

The applicant has previously provided the historical data collected from the internal booking system and this data covers the period from 2010 to the present day. This booking data comprises the number of bookings, the type of accommodation occupied and the number of people per booking. Due to the sensitive nature of the raw booking data it is not possible to publish this publically.

8.58 On receipt of the raw booking data from the applicant, the LPA selected a calendar year at random (2014) and requested the supporting data for this year in order to check the occupation averages provided by the applicant against the raw booking data. On tab A of the LPA's calculations the individual booking group size has been recorded without sensitive information such as the name of the individual included.

- 8.59 Following the review of the 2014 data it was confirmed that the average occupancy per unit for that year, as calculated by the planning agent and set out on attachment 3 of the appellant's calculations, did indeed match the raw booking data. Natural England have previously suggested undertaking this exercise for a more recent year but this data has not been provided to the LPA and so an assessment has been undertaken on the basis of the available information.
- 8.60 *Calculation of population per unit for existing scenario*
The proposed development will serve to replace the existing touring pitches rather than the existing static caravan's onsite and therefore, it is the average of the touring pitches that has been taken forward as the basis of the calculation for the existing visitor population. The resulting figure is an average of 2.65 people per pitch when calculated across the whole dataset of 10 years, as summarised on tab B of the LPA's calculations.
- 8.61 Following the review undertaken by the LPA of the raw booking data for 2014 as set out above, it is considered that an average of 2.65 is sufficiently precautionary, particularly given that 2.65 is less than the average recorded in the most recent years (2020 and 2021) and therefore, does not represent the highest recorded occupancy average. As a result, the LPA has also taken forward the average of 2.65 people for the calculation of the existing population as set out on tab C of the LPA's calculations.
- 8.62 *Calculation of population per unit for future scenario*
In order to calculate an average population figure for the proposed lodges, the applicant's agent has referred to the historic data collected for the existing static caravan's onsite and identified the highest average recorded of 2.5 people per static caravan as set out on tab B of the LPA's calculations. It is acknowledged that the data only relates to a limited number of static caravans but notwithstanding this point, the data represents historic data bespoke to the application site and is the highest recorded average for this type of accommodation. An average of 2.5 is higher than the average household size of 2.4 people per household utilised by Natural England's standard methodology guidance for calculating nutrient neutrality for new residential dwellings. The LPA has therefore taken forward this average when calculating the population per unit for the proposed lodges as set out on tab C of the LPA's calculations.
- 8.63 *Calculation of seasonal occupancy rates*
Following the receipt of the raw booking data the LPA also took the opportunity to review the seasonal occupancy rates using real life data and this analysis is set on tab A of the LPA's calculations. The theoretical capacity of the application site was calculated by referring back to the limitations currently imposed on each part of the site multiplied by the number of unit days in each calendar month. For the Willows overflow section, units occupying this part of site are limited to a total of 21 days in a calendar year between the months of April and September. As a result, 21 unit days has been evenly divided between the months of May, June, July and August.

8.64 With regard to calculating a seasonal occupancy rate for the months of January, February, November and December in the absence of any real life data, a combined average for March and October has been used. This equates to a 5.7% occupancy rate. Although these months do not represent the high season, given the worsening weather conditions during winter months, it is considered that in all likelihood the use on an average from late autumn/early spring is likely to be a modest overestimation of the visitor population and therefore is sufficiently robust.

8.65 It is acknowledged that previously the LPA used an average of March, April, September and October to identify an average for the winter months with no available historical data. However, given the analysis set out in the LPA's calculations with regard to the national profile of seasonal occupancy, it is considered that the previous combination of averages was unreasonable and resulted in a significant overestimation of the occupancy through winter. As such, the combination of March and October, is considered to represent a more robust approach.

8.66 *Solent and Southampton Water SPA*

The application site is located outside of the 5.6km buffer zone of the Solent and Southampton Water SPA and therefore, it is not considered that there would have been any additional impact arising from recreational pressure.

8.67 *Conclusion*

There is a variation between the applicant's calculation when compared to the LPA's calculation, predominantly due to the application of real life rather than tourism industry averages for the seasonal occupancy within the LPA's calculation. However, the LPA's calculation concludes that the proposed development will result in a net reduction of 1,036 visitors overall and therefore, it is concluded that there will be no likely significant impact on the designated SPA arising from additional recreational pressure.

8.68 Natural England responded to the Appropriate Assessment undertaken on the 22nd August 2022 raising no objection with the following comment:

Bespoke Occupancy Figures

We note that a bespoke occupancy figure has been used in the calculation based on historical, site-specific data from Hill Farm Caravan Park in 2014. Provided that you, as Competent Authority, are satisfied the occupancy rates used in the budget are suitably precautionary and justified with sound evidence, Natural England's (sic) raises no further issue.

8.69 On this matter, it is noted that there have been considerable representations objecting to the data reported by the applicant and the LPA's method of calculation. However, it is considered that the use of the historical data bespoke to the application site represents the most scientifically robust evidence, in comparison to tourism industry averages formulated from national surveys that do not account for the individual characteristics of the application site. Where historical bespoke data cannot be relied upon, for example in the

case of calculating winter months occupancy that the application site does not currently operate within, then an approach informed by third party data has been adopted. It is considered that this approach is as precautionary as possible within the parameters of the planning system.

8.70 It is noted that concerns have also been raised in relation to the small number of existing caravans that the bespoke occupancy data has been generated from. In response to a request to the applicant for further evidence to be provided, it has been confirmed that no further data will be provided. The Local Planning Authority must therefore proceed on the basis of the information currently available.

8.71 Offsite Impact on Designated Sites: Nutrient Loading

Solent and Southampton Water SPA/Ramsar, Chichester and Langstone Harbours SPA/Ramsar, Portsmouth Harbour SPA/Ramsar, Portsmouth Harbour SPA/Ramsar

There is existing evidence of high levels of nitrogen and phosphorus in the water environment across the Solent, with evidence of eutrophication at some designated sites. An Integrated Water Management Study for South Hampshire was commissioned by the Partnership for Urban South Hampshire (PUSH) Authorities to examine the delivery of development growth in relation to legislative and government policy requirements for designated sites and wider biodiversity. This work has identified that there is uncertainty regarding whether any new housing development does not contribute to net increases in nutrients entering these designated sites.

8.72 As such, the emerging advice from Natural England is that the applicants for development proposals resulting in a net increase in dwellings or units of overnight accommodation are required to submit the nitrogen budget for the development to demonstrate no likely significant effect on the European designated sites due to the increase in waste water from the new housing. Although it has been identified in the preceding sections that the proposed development will not trigger an increase in population, given the potential for changes to water consumption and land classification within the application site, it is considered necessary to assess the potential impact on nutrient loading.

8.73 Although it has been identified in the preceding sections that the proposed development will not trigger an increase in population, given the potential for changes to water consumption and land classification within the application site, it is considered necessary to assess the potential impact on nutrient loading.

8.74 *Foul Drainage Provision*

The application site is currently served by a package treatment plant and as confirmed on page 3 of the applicant's calculations, this will be retained and maintained in accordance with the current maintenance arrangements undertaken onsite. In accordance with Natural England's latest guidance and version of the budget calculator, a default of 70.9 mg/TN/litre figure has been used.

8.75 *Water usage*

As the application site comprises a variety of additional operations beyond the provision of pitches for tents and touring caravans, such as the caravan sales yard and the existing static caravan's onsite that will be retained, it is not possible to identify the precise historic water usage generated by the occupation of the touring pitches.

8.76 Instead, the assessments undertaken by both the applicant and the LPA have applied the BS 8551:2015 as the standard for temporary water supply that ascribes the following values for different types of accommodation; tent (70 litres per person per day), static caravan not serviced (100 litres per person per day) and chalet (227 litres per chalet per day equivalent to 90.8 litres per person per day when using an average occupancy of 2.5 people per unit). These values with the addition of the 10 litre precautionary buffer have been used.

8.77 *Population numbers*

The population figures to inform the LPA's nutrient budget calculations have been informed by the visitor number analysis set out above in relation to recreational pressure and it is therefore confirmed that this data has been used for both elements of the Appropriate Assessment.

8.78 *Proposed budget*

The LPA's calculation identifies the nutrient budget to be generated by the proposed development. The 7,548 visitor number identified previously in the visitor analysis has been divided by the number of calendar days (365.25) to provide a daily total average of visitors' onsite for all of the proposed lodges. This results in an average occupancy of 20.67 people per day for the purpose of the calculator. There are 80 total lodges and therefore a total occupancy rate of 0.26 (21.25 people / 80 units) per day has been used.

8.79 The water usage has been calculated as 91 litres per person per day (calculated as 227 litres per chalet / 2.5 occupancy per unit), with the additional 10 litre buffer resulting in an overall total of 101 litres per person per day. Following the use of the above inputs, a total nutrient budget of 74.17 Kg/TN/yr has been identified for the existing use of the application site.

8.80 *Conclusion*

The proposed development will result in an overall net reduction of 0.89 Kg/TN/yr. As a result, it is concluded that the proposed development will not result in a likely significant impact with regard to additional nitrate loading.

8.81 Natural England responded to the Appropriate Assessment undertaken on the 22nd August 2022 raising no objection and in addition to the previous comment on the bespoke occupancy figures set out in paragraph 8. above, provided the following comment:

Water Consumption Rates

It is noted bespoke water usage figure has been used to inform the nutrient budget and are based on British Standard 8551:2015 that provides a standard temporary water supply for tents, touring caravans and chalets.

We understand a precautionary 'buffer' has been applied to account for the variation in tent and caravan numbers over previous year and lowers the existing water usage rate to ensure a substantial buffer is included in the nutrient calculation. This 'buffer' has been used in addition to the 10l precautionary buffer advised by Natural England in relation to our updated guidance on nutrient neutrality.

Provided that you, as Competent Authority, are satisfied the water usage figures used in the budget are suitably precautionary and justified with sound evidence, Natural England's (sic) raises no further issue.

Package Treatment Plant

The proposed development will be served by the existing PTP onsite and we understand the PTP will continue to be maintained under the current maintenance arrangements.

- 8.82 For the rationale set out above, it is considered that the use of bespoke water efficiency rates represents the most scientifically robust approach given that the rates account for the individual characteristics of different accommodation types. As discussed below in the section titled 'Water Management', as the lodges themselves do not form part of the planning application, it is not possible to impose a condition securing water efficiency rates. However, as noted above, the calculation undertaken includes a 10 litre precautionary buffer in accordance with the Natural England standard guidance. As such, it is considered that the approach and calculation undertaken is sufficiently robust and precautionary.
- 8.83 In relation to the package treatment plants, it has been confirmed by the planning agent that the existing infrastructure is sufficient to accommodate the proposed development. Given that the proposal will result in an overall reduction in the total number of pitches onsite and more even distribution of visitors from the change to a year round operation, this is not considered an unlikely prospect. In the event that the existing package treatment plants are do not have sufficient capacity to accommodate the proposed development, then control under separate legislation is available to ensure that sufficient provision is made available onsite.
- 8.84 Conclusion on ecology
Following the assessment undertaken above, it is considered that the proposed scheme will avoid any adverse impact on protected species and habitats in addition to offsite designated areas. Consequently, the application is in accordance with Policy E5 of the TVBRLP.

8.85 **Water Management**

Policy E7

Policy E7 relates to water management and states as follows:

Development will be permitted provided that:

- a) it does not result in the deterioration of and, where possible, assists in improving water quality and be planned to support the attainment of the requirements of the Water Framework Directive;*
- b) it complies with national policy and guidance in relation to flood risk;*
- c) it does not result in a risk to the quality of groundwater within a principal aquifer, including Groundwater Source Protection Zones and there is no risk to public water supplies;*
- d) all new homes (including replacement dwellings) achieve a water consumption standard of no more than 110 litres per person per day; and*
- e) all new non-residential development of 500sqm or more achieve the BREEAM 'excellent' credit required for water consumption (reference Wat 1).*

Criteria d) – e) need to be satisfied unless it can be demonstrated that it is not financially viable.

8.86 *Criterion (a)*

In support of the application a surface water and foul drainage assessment was submitted, with an additional addendum provided in response to initial comments provided by the Local Lead Flood Authority (hereafter LLFA). The submitted assessment identifies that surface water run-off from the associated lodges will be accommodated through the use of permeable paving for the proposed car parking area and internal access roads. The LLFA have raised no objection to this proposed arrangement subject to the imposition of conditions securing details of any technical alterations that arise from the implementation stage as well details of the maintenance and ongoing management measures.

8.87 It is also noted that Southern Water have requested the input of Building Control officers on the design of the proposed drainage strategy but given the reviews undertaken by the LLFA and the EA, it is not considered necessary for any further input at this stage. Any requirements under Building Control legislation remain applicable as a separate process to the assessment of the planning application.

8.88 As discussed in further detail on the section titled 'Impact on the general amenity of the area' below, any wastewater generated from the proposed change of use will be served by the existing package treatment plants onsite. The Environment Agency have raised no objection to this arrangement with reference drawn to the permitting process that is a requirement separate to the assessment of the planning application.

- 8.89 Therefore, it is considered that the proposed surface water and foul water drainage system is sufficient to avoid any adverse impact on water quality, in accordance with criterion (a).
- 8.90 *Criterion (b)*
The application site is located within Flood Zone 1 and therefore, it is considered that the proposed development complies with national flood risk policy and guidance, in accordance with criterion (b).
- 8.91 *Criterion (c)*
As noted above in relation to the assessment against criterion (a), the application is supported by technical documents that detail the provision of an acceptable surface water drainage strategy. Furthermore, it is noted that the application site is not located within a groundwater source protection zone. Consequently, it is not considered that the proposed scheme will result in a risk to the quality of groundwater within a principal aquifer or trigger an adverse risk to public water supplies. As such, the proposal complies with criterion (c).
- 8.92 *Criteria (d) and (e)*
As aforementioned, the proposed scheme does not include the installation of lodges or any other type of tourism accommodation unit. Therefore, it is not possible to impose any conditions requiring the achievement of the corresponding water efficiency standards. Consequently, criteria (d) and (e) are not applicable in this instance.
- 8.93 *Conclusion on Policy E7*
Following the assessment undertaken above it is considered that the proposed scheme is in accordance with Policy E7 of the TVBRLP.
- 8.94 It is noted that Southern Water have commented on the potential presence of a public sewer in proximity to the proposed development, this is a matter for the applicant to pursue with the relevant third parties outside of the assessment of the planning application.
- 8.95 Third party representations have raised concern in relation to the potential impact on water supply but in the absence of any objection or concerns raised by Southern Water in relation to this aspect, then it is considered that there will be no material harm to local water supply. In addition, the request for the incorporation of measures to recycle grey and rain water is noted but it is not necessary to secure these measures to make the proposal acceptable in planning terms.
- 8.96 **Impact on the general amenity of the area**
Policy E8 relates to the potential for pollution and states as follows:

Development will be permitted provided that it does not result in pollution which would cause unacceptable risks to human health, the natural environment or general amenity.

Development that would or could potentially generate pollution will only be permitted if it can be demonstrated that there would not be any adverse impact on human health, the natural environment or general amenity.

Development which is sensitive to pollution will only be permitted if the intended users are not subject to unacceptable impact from existing nearby uses having taken account of proposed mitigation measures.

8.97 Foul drainage

In the absence of any connection to mains drainage, the proposed scheme will be served by the existing package treatment plants onsite. As aforementioned, it is considered that this is not considered to be an unlikely prospect given the scale of the existing tourism facility and the anticipated modest reduction in overall visitor numbers as set out in the ecology section above.

8.98 However, even in the event that existing infrastructure fails to sufficiently accommodate the wastewater drainage generated by the proposed development then controls through other legislation such as the EA licencing process are available. As such, it is considered that the proposal will avoid an adverse polluting impact arising from the generation of wastewater.

8.99 Third party representations have raised concern that there have been previous incidents onsite of sewerage spillages but this does not undermine those controls available within other processes and legislation to ensure that the proposal avoids a materially significant polluting impact on the general amenity of the area.

8.100 Light

The submitted proposed site plan includes an indicative reference to bollard lighting located throughout the proposed pitch areas. To ensure that the proposed bollard lighting and any other external lighting does not result in an obtrusive light pollution on the general amenity of the area, a condition has been imposed securing the requirement for the specification details of any external lighting to be submitted and approved prior to installation.

8.101 Third party representations have raised concern that the proposal will result in light pollution resulting from light spill generated by internal lighting of the lodges but as discussed previously, the lodges do not form part of the planning application. Therefore, this matter does not represent a reasonable basis for refusing the planning application.

8.102 Noise

It is acknowledged that the proposal will result in the areas currently in use as caravan storage for additional pitches, but given that the existing storage use is likely to generate a level of noise from the periodic manoeuvring of caravans, it is not considered that the proposed use for pitches will result in a materially significant increase in noise levels for these areas. The remaining

pitches are either located on existing pitch areas or a significant distance away from any residential property or neighbouring uses of a noise sensitive nature. Consequently, it is not considered that the proposal will trigger additional noise pollution.

8.103 Smell

Given that the proposed development is limited to hard and soft landscaping works to facilitate the use of lodges rather than caravans and tents, it is not considered that the proposal will result in any material significant additional smell pollution on the general amenity of the area.

8.104 Impact on visitors

The provision of adequate amenities is covered by separate licencing legislation and therefore, does not form part of the assessment of the planning application.

However, the submitted masterplan demonstrates the retention of a sizeable informal recreation space located in the centre of the wider application site as well as indicating that each pitch will have a modest allocated area of open space. As such, it is not considered that the proposed layout will result in unacceptable conditions onsite for visitors of the application site.

8.105 Third party representations have also raised concern that the proposed scheme does not provide sufficient amenity space or intervening space between individual units in the event that a pandemic occurs. On this matter, it is noted that the proposed layout retains the allocation of individual pitches and therefore, it will be possible to isolate individual units should such an event occur. Consequently, it is considered that the proposed scheme will not be dissimilar to the existing layout and not undermine the ability to operate suitable precautions in the event of a pandemic.

8.106 Furthermore, concern has been raised in relation to the relationship between the proposed pitches at the southern end of the application site and the adjoining agricultural fields that form part of the holding known as Pound Farm. This concern has been raised in the context of the potential disturbance from activities such as grass cutting, odour, rats and biosecurity. However, the proposal is for tourism accommodation and therefore, the nature of any visits will be short term and there is unlikely to conflict between the two uses, particularly given the screening provided by the vegetation on the shared boundary.

8.107 Fire risk

Concern has also been raised that the proposal will trigger an additional fire risk through the potential increased use of barbeques onsite. However, the proposal only serves to reduce the overall number of pitches onsite and alter the nature of the operation from the existing seasonal pattern to all year round. It is therefore not considered that an additional fire risk will be triggered by the proposed scheme.

- 8.108 Conclusion on the impact on the general amenity of the area
Following the assessment undertaken above, it is considered that the proposed development will avoid any materially significant polluting impact on the general amenity of the area and therefore, the application is in accordance with Policy E8 of the TVBRLP.
- 8.109 **Heritage**
The residential property known as March End is located to the north-east of the application site and is Grade II listed. In addition, the residential property known as Old Roost Cottage is also Grade II listed and located to the north-west of the application site. Sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 require special regard to be had to the desirability of preserving the listed building or its setting or any features of special architectural or historical interest which it possesses. In addition, Policy E9 of the TVBRLP requires that development positively contributes to sustaining or enhancing the significance of the heritage asset.
- 8.110 In response to this matter a heritage statement was provided in support of the application, identifying that the proposed development would not directly intrude upon the immediate setting of either listed building with the proposed development contained within the existing tourism site. Due to the intervening distance and the retention of the existing vegetation on the boundaries of the application site, it is considered that the proposal will avoid any significant change to the existing relationship between the application site and either listed building.
- 8.111 Third party representations have raised concern that the proposed landscape planting is insufficient to prevent an adverse impact on the setting of the listed buildings, particularly in relation to Martins Roost. However, the purpose of the proposed landscaping is not to completely screen all views of the proposed development from the listed buildings but to ensure that it does not appear any more intrusive on the setting of the listed buildings than the existing relationship.
Consequently, it is considered that the proposal will avoid any material harm to the special interest and historical significance of either listed building.
- 8.112 As a result of the assessment undertaken above, it is considered that the proposed scheme will preserve the special interests of both listed buildings and their settings. Therefore, the application is in accordance with Policy E9 of the TVBRLP.
- 8.113 **Impact on the amenity of residential property**
Impact on neighbouring properties
The proposed site plan demonstrates that the proposed pitches at the front (western end) of the application site will be in a similar arrangement to the existing layout. As such, it is not considered that the proposed scheme will result in any material loss of privacy or daylight and sunlight provision for the residential properties to the north-west of the application site.

- 8.114 In relation to potential impact on the existing dwellings positioned adjacent to the application site to the north-east (known as March End, Courtyard House, Pemberton Lodge and Doctor's Hill Farm), the proposal will result in the existing caravan storage areas at the rear (east) of the application site being used as pitch locations. However, any associated lodge will need to comply with the height restriction set out in paragraph 3.3 above, and the existing vegetation on the boundaries of the application site provides significant screening. Therefore, in conjunction with the intervening distance and offset position of the proposed pitches in relation to these neighbouring properties, it is not considered that the proposal will result in any materially significant loss of privacy or daylight and sunlight provision.
- 8.115 Third party representations have also raised concern in relation to the potential impact on the open fields adjoining the application site to the south, but that this does not form part of any residential property, it is not considered that there will be any adverse impact on residential amenity.
- 8.116 Consequently, it is considered that the proposal sufficiently provides for the amenity of residential property in accordance with Policy LHW4 of the TVBRLP.
- 8.117 **Highways**
Access
The proposed scheme does not include any alterations to the existing vehicular access onto Branches Lane. The Highways Officer has reviewed the proposal and commented that the change of use to lodge accommodation is likely to result in a reduction in towed vehicles on the local road network when compared to the existing tent and caravan operation.
- 8.118 In terms of vehicle trip generation, as aforementioned above in the section on recreational pressure, it is anticipated that the proposal will result in less visitors overall. In addition, the reduction in the total number of pitches onsite and change to a year round operation rather than the current seasonal restrictions will allow for a more consistent trip generation profile throughout the year. Consequently, it is considered that the proposed scheme will avoid any materially significant increase in vehicle movements. It is noted that third party representations have raised concern that vehicles on Branches Lane cannot pass but it is evident from previous site visits that there are passing places available. Given the short distance between the application site and the junction with the A27, it is therefore not considered that there will be any significant material highway safety harm.
- 8.119 To ensure that there is no highway safety issue during the implementation stage, a condition has been added securing the submission of a traffic management plan to ensure that the alterations to the site layout and lodges are brought onto the application site in a phased manner. In addition, a condition has been imposed securing the laying out of the allocated parking spaces prior to the associated pitch being brought into use to ensure that there is no displacement of vehicles onto the public highway.

- 8.120 Third party representations have raised concern that the proposed development will require the installation of a pavement or footpath along Branches Lane but given the analysis set out above, it is not considered that this is reasonable to make the development acceptable or necessary in planning terms. Similarly, it is not considered that the proposal triggers any requirement for a financial contribution towards highway improvements.
- 8.121 As a result, it is considered that the proposed development will avoid any adverse impact on the highway safety of the local road network in accordance with Policy T1 of the TVBRLP.
- 8.122 **Parking**
There are no minimum parking standards as set out in Annexe G of the TVBRLP that correspond with the type of development proposed in this instance. However, it is noted that the submitted proposed site plan demonstrates that each pitch will include two allocated parking bays. It is considered that the allocation of two parking bays per pitch is an acceptable provision that will avoid any the requirement for significant on street parking. As a result, the application is in accordance with Policy T2 of the TVBRLP.
- 8.123 **Crime and Community Safety**
Third party representations have raised an objection on the basis of crime and community safety but in the absence of any specific concerns provided it is not clear what issues would arise. As the proposal is limited to the redevelopment of an existing tourism site, it is not considered that the proposal will trigger any adverse impact on community safety and therefore, the application is in accordance with Policy CS1 of the TVBRLP.
- 8.124 **Conditions**
To ensure that the application site and proposed pitches are only used for the provision of tourism accommodation, conditions have been imposed preventing the occupation of the pitches as a main residence and requiring the applicant to maintain a register of visitors. These conditions will be applied in tandem with the completion of a legal agreement, discussed in the following section, to control the phasing of the development.
- 8.125 Third party representations have also requested the imposition of a condition setting a time based restriction on a single period of occupation with reference to a similar development at Winchester Golf Club. However, it is not considered necessary to set out particular restrictions on the length and frequency of occupation given the ability to monitor occupancy through the keeping of a register and the ability to ensure that the future occupancy is not the main place of residence. Concerns have also been raised that planning conditions will not be enforced as the lodges will be sold to third parties, but planning conditions run with the land and therefore, it is considered that the ownership of individual lodges will not prevent the ability to enforce those conditions proposed.

- 8.126 In addition to conditions relating to the use of the proposed development, further conditions have been imposed to secure the precise details and implementation of the proposed trees, landscape, ecology, drainage and highway measures.
- 8.127 **Legal agreement**
As set out in paragraph 4.1, the application site is subject to a number of legal obligations setting out parameters for the capacity of each parcel of the application site as well as seasonal restrictions on the existing tourism use. It is therefore necessary for a new legal agreement to be completed to correspond to the proposed development.
- 8.128 The current units stationed at the rear (east) of the application site, those labelled 'The Holiday Park' in the previous legal agreement are to remain unaffected by the proposal and therefore, the new legal agreement will simply replicate the current obligations.
- 8.129 In order to avoid the total number of visitors exceeding the existing baseline, as identified in the analysis set out in the sections on recreational pressure and nutrient loading, at any point during the implementation phase, a phasing plan has been provided. The submitted phasing plan sets out the sequencing of the proposal, beginning with the existing pitch areas at the western end of the application site and progressing further inwards.
- 8.130 For those areas subject to the proposed pitches including the pitch areas known as The Hawthorns, The Pines and The Willows as well as the existing caravan storage areas will be subject to the current obligations until work commences to implement the proposed development. At the point, each individual parcel of land will be subject to the capacity restrictions set out within the submitted phasing plan. This will prevent any conflict with the current permissions and obligations that are in place.
- 8.131 **Other matters**
Third party representations have set out a number of other matters and these are addressed below.
- 8.132 *Assessment of lodges*
As set out above, the lodges that will use the proposed pitches do not form part of the planning application and therefore it is reasonable or necessary to secure precise details of their final specification. Should it transpire that the structures do not conform to the relevant legislative requirements as set out in section 3 above, then it will be open to the Local Planning Authority to undertake any necessary enforcement action to remedy any breach of planning control.
- 8.133 In addition, the submitted application form and supporting information is clear that the proposed pitches will only be used for tourism accommodation as summarised by the proposal description. Therefore the application has been assessed on this basis. In the event that the proposed pitches are not being

used for tourism accommodation then again it is open to the Local Planning Authority to undertake any necessary enforcement action to remedy any breach of planning control.

8.134 *Scope of the application*

The scope of the current planning application is limited to those matters set out in the proposal description and section 3 of this report, it has no bearing on any outstanding breaches of planning control.

8.135 As it has been concluded that the application is acceptable on the submitted terms, it is not reasonable or necessary to secure a reduction in the amount of proposed pitches. As discussed in the section on phasing above, controls have been imposed to ensure that the proposed development is delivered in an orderly and acceptable manner.

8.136 *Provision of dwelling houses*

The assessment of the current application does not in any way represent a prejudicial judgement on any potential future planning application for dwelling houses either at the application site or elsewhere in the parish, or indicate that such an application is forthcoming.

8.137 As such, previous planning decisions for additional dwelling houses elsewhere in the Parish have no bearing on the assessment of the current planning application.

8.138 *Planning history, previous planning decisions*

With regard to the status of developments at other locations such as those referred to at King Edward Mobile Home Park or Romsey Brewery, this does not constitute a material consideration to the current application which is assessed on its own merits.

8.139 *Gas supply*

Third party representations have raised concern that the application site does not benefit from an existing gas supply, but the connection to services is a private civil matter outside the scope of consideration.

8.140 *Public open space contribution*

As discussed above, the proposal is not for additional dwellings and therefore, it is not necessary or reasonable for a public open space contribution to be secured in order to make the development acceptable in planning terms.

9.0 **CONCLUSION**

9.1 The proposal is considered acceptable and in accordance with the policies of the TVBRLP, therefore the recommendation is for permission.

10.0 RECOMMENDATION

Delegate to the Head of Planning and Building for the completion of a legal agreement to secure the following restrictions:

- Replicate the restrictions relating to The Holiday Park, as defined by the previous legal agreement completed under 11/00308/OBLS.
- Secure the phasing of the development in accordance with the submitted phasing plan.

Then PERMISSION subject to:

1. The development hereby permitted shall be begun within three years from the date of this permission.
Reason: To comply with the provision of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.
2. The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans:
Revised Site Location Plan
Amended Landscape Masterplan (Figure 9 Rev P9)
Soft Landscape Details Sheet 1 of 2
Soft Landscape Details Sheet 2 of 2
Amended Proposed Planting Plan
Reason: For the avoidance of doubt and in the interests of proper planning.
3. The development hereby permitted shall only be occupied by units qualifying as caravans, as defined by the Caravan Sites and Control of Development Act (1960) and the Caravan Site Act (1968) as amended.
Reason: To accord with the terms of the application and to ensure satisfactory planning of the area.
4. The pitches hereby permitted shall only be occupied by a maximum of 80 units at any one time.
Reason: To accord with the terms of the application and to ensure satisfactory planning of the area.
5. The static caravans, cabins/chalets occupying the pitches hereby permitted shall not be occupied as a persons' sole or main place or residence.
Reason: The application 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 having regard to Policies COM2 and LE18 of the Test Valley Borough Revised Local Plan (2016).
6. The owners/operators of the site shall maintain an up-to-date register of the names of all owners/occupiers of individual caravans/log cabins/chalets on the site, and of their main home addresses, and shall make such information available at all reasonable times to the Local Planning Authority.

Reason: The application 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 having regard to Policies COM2 and LE18 of the Test Valley Borough Revised Local Plan (2016).

- 7. The development hereby permitted shall be undertaken in full accordance with the provisions set out within the RPS Tree Survey and Arboricultural Impact Appraisal (containing tree protection measures) reference JSL3693_780 dated 20th September 2020. Reason: To ensure the enhancement of the development by the retention of existing trees and natural features during the construction phase in accordance with Policy E2 of the Test Valley Borough Revised Local Plan (2016).**
- 8. Tree protective measures installed (in accordance with the tree protection condition listed as no.) shall be maintained and retained for the full duration of works or until such time as agreed in writing with the Local Planning Authority. No activities, nor material storage, nor placement of site huts or other equipment whatsoever shall take place within the barrier. Reason: To ensure the avoidance of damage to existing trees and natural features during the construction phase in accordance with Policy E2 of the Test Valley Borough Revised Local Plan (2016).**
- 9. Prior to the commencement of development, a method statement, detailing the no dig surfacing construction method for areas within the root protection zones of the retained trees, shall be submitted to and approved in writing by the Local Planning Authority. All work shall be undertaken in accordance with the requirements, specifications and timing detailed within the approved method statement. Reason: To prevent the loss during development of important local landscape features and to ensure, so far as is practical, that development progresses in accordance with current Arboriculture best practice, in accordance with Policy E2 of the Test Valley Borough Revised Local Plan (2016).**
- 10. No development shall commence on site (including any works of demolition), until a Construction and Demolition Environmental Management Plan and Ecological Management Plan has been submitted to, and approved in writing by, the Local Planning Authority. The Plan shall include the following:
 - i) the parking of vehicles of site operatives and visitors;**
 - ii) the phasing of delivery vehicles bringing the lodges onto site**
 - iii) loading and unloading of plant and materials;**
 - iv) storage of plant and materials used in constructing the development;**
 - iv) hours of construction, including deliveries;**
 - v) the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;**
 - vi) wheel washing facilities;****

- vii) measures to control the emission of dust and dirt during demolition and construction;
- viii) a scheme for recycling/disposing of waste resulting from demolition and construction works; and
- ix) measures for the protection of the natural environment and the ongoing management of Doctors Copse SINC

The approved Statement shall be complied with in full throughout the construction period. The development shall not be carried out otherwise than in accordance with the approved construction method statement.

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, to minimise detrimental effects to the neighbouring amenities, the amenities of the area in general, detriment to the natural environment through the risks of pollution and dangers to highway safety, during the construction phase having regard to Policy E8 of the Test Valley Borough Revised Local Plan (2016).

11. The development hereby permitted shall proceed in accordance with the measures set out in Section 4.0 'Conclusions, Impacts and Recommendations' of the Hill Farm Caravan Park, Branches Lane, Romsey, SO51 6FH Preliminary Ecological Impact Assessment (Arbtech November 2020), unless varied by a European Protected Species (EPS) licence issued by Natural England.

Reason: To ensure the favourable conservation status of bats and other protected species in accordance with Policy E5 of the Test Valley Revised Local Plan (2016).

12. No development shall take place above DPC level of the development hereby permitted, until details of a scheme of ecological enhancement measures to be incorporated within the proposed is submitted and approved by the Local Planning Authority. All enhancement measures should be permanently maintained and retained in accordance with the approved details.

Reason: To enhance the biodiversity of the site in accordance with requirements under the National Planning Policy Framework and Policy E5 the Test Valley Borough Revised Local Plan (2016).

13. Notwithstanding the information provided for the western boundary, no development shall take place above DPC level of the development hereby permitted until full details of the hard and soft landscape works have been submitted and approved. Details shall include:

- (i) planting plans;
- (ii) written specifications (including cultivation and other operations associated with plant and grass establishment);
- (iii) schedules of plants, noting species, plant sizes and proposed numbers/densities;
- (iv) hard surfacing materials.

The landscape works shall be carried out in accordance with the approved details.

Reason: To enable the development to respect, complement and positively integrate into the character of the area in accordance with Policies E1 and E2 of the Test Valley Borough Revised Local Plan (2016).

14. Prior to the pitches hereby approved being brought into use, a schedule of landscape implementation and maintenance for a minimum period of 5 years has been submitted to and approved in writing by the Local Planning Authority. The schedule shall include details of the arrangements for the phasing of the implementation and ongoing maintenance during that period in accordance with appropriate British Standards or other recognised codes of practise. Development shall be carried out in accordance with the approved schedule. Any trees or planting that are removed, die or become, in the opinion of the Local Planning Authority, seriously damaged or defective within this period, shall be replaced before the end of the current or first available planting season following the failure, removal or damage of the planting.

Reason: To enable the development to respect, complement and positively integrate into the character of the area in accordance with Test Valley Borough Revised Local Plan (2016) Policies E1 and E2.

15. The drainage system hereby permitted shall be constructed in accordance with the approved documents:
- Site Investigation Percolation Testing (reference: PT-2020-00002 1.1, dated: 12/01/2020).
 - Surface Water Drainage Technical Summary (reference: AAC5728; dated: 6th December 2020).
 - Flood Risk Assessment and Conceptual Foul and Surface Water Drainage Strategy (reference: RCEF77450 002, dated 28th September 2020).

Any changes to the approved drainage strategy and associated documentation must be submitted to and approved in writing by the Local Planning Authority and the Lead Local Flood Authority in consultation with the Environment Agency where necessary. Any revised details submitted for approval must include a technical summary highlighting any changes, updated detailed drainage drawings and detailed drainage calculations. Implementation of the surface water drainage system shall be in accordance with the approved details and retained thereafter.

Reason: To ensure that the development does not result in the deterioration of water quality and unacceptable level of surface water flooding or an unacceptable polluting impact on controlled waters in accordance with Policies E7 and E8 of the Test Valley Borough Revised Local Plan (2016).

16. Prior to the completion of the drainage strategy hereby approved, details for the long-term maintenance arrangements of the surface water drainage system shall be submitted to and approved in writing by the Local Planning Authority. The submitted details shall include:

- a. Maintenance schedules for each drainage feature type and ownership.**
- b. Details of protection measures.**

Management of the surface water drainage system shall be in accordance with the approved details and retained thereafter.

Reason: To ensure that the development does not result in the deterioration of water quality and unacceptable level of surface water flooding in accordance with Policy E7 of the Test Valley Borough Revised Local Plan (2016).

17. The development hereby approved shall not be brought into use until the car parking spaces shown on the approved masterplan have been provided. The areas of land so provided shall be retained at all times for this purpose.

Reason: To ensure sufficient off-street parking has been provided in accordance with Policy T2 of the Test Valley Borough Revised Local Plan (2016) and in the interest of highway safety in accordance with Policy T1 of the Test Valley Borough Revised Local Plan (2016).

18. No external lighting shall be installed until details have been submitted to and approved in writing by the Local Planning Authority. The details shall include plans and details sufficient to show the location, type, specification, luminance and angle of illumination of all lights/luminaires. The external lighting shall be installed in accordance with the approved details.

Reason: To ensure the favourable conservation status of bats in accordance with Policy E5 of the Test Valley Borough Revised Local Plan (2016).

Note to applicant:

- 1. In reaching this decision Test Valley Borough Council (TVBC) has had regard to the National Planning Policy Framework and takes a positive and proactive approach to development proposals focused on solutions. TVBC work with applicants and their agents in a positive and proactive manner offering a pre-application advice service and updating applicants/agents of issues that may arise in dealing with the application and where possible suggesting solutions.**
-