
APPLICATION NO.	23/00847/FULLS
APPLICATION TYPE	FULL APPLICATION - SOUTH
REGISTERED	11.04.2023
APPLICANT	Mr G Billett
SITE	Hill Farm 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 14.07.2023: <ul style="list-style-type: none">• Applicant's nutrient budget assessment. Received on 25.05.2023: <ul style="list-style-type: none">• Preliminary Ecological Appraisal and Preliminary Roost Assessment.
CASE OFFICER	Mr Graham Melton

Background paper (Local Government Act 1972 Section 100D)

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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 68 holiday lodges.

In addition the land allocated for the siting of the 68 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 18th 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.*
- 4.7 **20/02385/FULLS** - 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. *Application refused for the following reasons (subsequent to Southern Area Planning Committee meeting on the 1st November 2022, decision issued on the 18th November 2022):*

01. The proposed development would result in the year round appearance of lodge style units of significantly greater scale, bulk and density than the touring caravans and tents that occupy the existing pitches on a sessional basis. Whilst the proposed planting scheme is noted, it is not considered that this will be sufficient to mitigate the visually intrusive appearance of the lodge style units when viewed from Branches Lane and Doctors Hill, particularly during winter months when vegetation is not in full leaf. As a result, the proposal will result in significant harm to the rural landscape character of the surrounding area contrary to Policy E2 of the Test Valley Borough Revised Local Plan (2016). The short and long term economic benefits of the proposal are acknowledge, but these benefits do not outweigh the real and obvious harm identified above or overcome the conflict with the development plan and NPPF.

02. In the absence of a signed and completed s106 legal agreement to secure the phasing of the development and discontinuation of existing activities there is a possibility that the proposed development by means of its nature, location and scale could have likely significant affects upon the nearby Solent and Southampton Water European Designated site which is designated for its conservation importance. Consequently, the application has failed to satisfy the Council that the proposal would not

adversely affect the special interest of the Solent and Southampton Water European Designated Site. Furthermore the proposed development, without the signed and completed s106 legal agreement could result in increased recreational pressure on the New Forest SPA, which is designated for its conservation importance and the application has failed to secure any mitigation measures, in accordance with the Council's adopted 'New Forest SPA Mitigation - Interim Framework'. As such, it is not possible to conclude that the development would not have an in-combination likely significant effect on the interest features of this designated site, as a result of increased recreational pressure. The proposal is therefore contrary to Policies E5 of the adopted Test Valley Borough Revised Local Plan (2016) and the Conservation of Habitats and Species Regulations 2017 (as amended).

Case officer note: An appeal against the refusal of this application has been submitted to the Planning Inspectorate and is currently pending consideration.

5.0 **CONSULTATIONS**

5.1 **Ecology** – No objection subject to conditions (following receipt of amended information).

- Reviewed the attached updated ecology report and provided that the measures detailed in Section 4.0 'Conclusions, Impacts and Recommendations' of the submitted Preliminary Ecological Appraisal and Preliminary Roost Assessment by Arbtech (April 2023) are secured via a planning condition to ensure their implementation, no concerns are raised.
- As previously suggested, a construction environment management plan is also recommended to be secured via a condition to ensure no adverse indirect impacts on the SINC located to the south of the application site.

5.2 **Landscape** – No objection subject to conditions (summarised).

- In order to address the previous issues raised, the number of units' onsite has been reduced from 80 to 68 (15% reduction).
- This amendment is noted particularly along the Branches Lane boundary and the landscaping has been further reinforced.
- A Landscape Visual Assessment has been submitted as part of the application, with the exception of the updated Masterplan, this appears largely the same as was previously submitted with the 2020 application.
- It was considered that the original LVA was thorough and gave a comprehensive assessment of the site.
- Measuring from the submitted Masterplan and the cross section submitted along Branches Lane is shown to range between 3-4m in width, with further individual tree planting between the hedgerow and the caravans.
- The depth of this buffer is sufficient; it should be ensured that if permission is granted that this agreed width is implemented.

- A new evergreen hedgerow has been proposed to the rear of the existing hedgerow along Branches Lane and where the site is most visible, whilst this will help to strengthen the mitigation, the species proposed are suburban in character; the species should be revised to be more sympathetic to the sites rural setting.
- It is also noted that the species are proposed to be planted between 60-80cm in height, in order to create a better initial screen, these should be planted at a minimum of 100cm.
- A 10 year landscape maintenance plan is required to ensure the successful establishment of all new planting and the ongoing maintenance of existing planting.
- All planting to be carried out within the first planting season, post application being granted.

5.3 **Natural England** – No comment at the time of writing.

Case officer note: A response from Natural England to the Appropriate Assessment undertaken remains outstanding at the time of writing. As a result, the officer recommendation includes the requirement for the receipt of a satisfactory consultation response from Natural England prior to the issuing of any planning permission.

5.4 **Trees** – No objection subject to conditions (summarised).

- The submitted arboricultural information demonstrates tree retention and removal and the impact of this.
- No trees of high merit are to be removed.
- Mitigation for tree loss is to be addressed through the landscaping proposal which should provide better quality trees long term.
- An arboricultural method statement will be needed to ensure the safe retention of trees, this can be obtained by condition.

6.0 **REPRESENTATIONS** Expired 02.10.2023

6.1 **Sherfield English Parish Council** – Objection (summarised).

- Although the number of lodges has been reduced from 80 to 69, they will become static rather than touring caravans and the Parish Council are concerned that they will become residential.
- They are supposed to be occupied for 11 months (which the parish council feel should only be 9 months) and are concerned how this will then be policed.
- Also noted that the Neighbourhood Development Plan was dismissed again after a lot of hard work.
- Aware that many parishioners are against this proposal of which we are representatives.

6.2 **14 representations in total from various addresses** – Objection (summarised).

- Previous planning decisions, Test Valley Borough Revised Local Plan 2016.

- A similar proposal has already been denied permission and can see no reason why this one shouldn't also be refused.

Principle of development

- This is a major development, there can be no comparison between the existing operation and the proposed development.
- Remain strongly opposed to this site becoming anything more than what it's currently used for – a part time caravan park.
- The application site should have a 9-month season and not change to 11 months otherwise it will simply become the site of permanent residences.
- Proposal will result in the relaxation of current restrictions.
- Application site is remote from services within Sherfield English.
- Need.
- Impact on local businesses cannot be fully realised as the proposed lodges include kitchens which means there is a lesser need for the local pubs and restaurants than if it were a touring and camping site.
- Contrary to Policy COM2.

Policy LE18

- The proposal does not comply with the criteria of Policy LE18 as the site is within countryside and the proposal does not use existing buildings and serve to replace an existing tourism site rather than form part of an existing tourism site.
- Proposal fails criterion (b) (iii) of Policy LE18 as the application site will not be there for seasonal times and the site would be used for 11 months.
- The proposal certainly does lead to a loss of serviced accommodation, the existing campsite often appears to be full.
- The loss of the existing campsite will be a great loss to the existing community.
- The application has been presented around the viability of the site, which is surprising and not sound judging by current numbers and its popularity.
- Further documentary evidence would be required if the applicant intends to rely on the justification based on viability.
- Contrary to the submitted information, there is an increasing need for touring caravan pitches in the UK with an increase in 'staycation' holidays since the pandemic.
- Proposal will result in a loss of available tourism pitches in the area and especially impact those most affected by the UK's cost of living issues with camping pitches being the only affordable option for many families.
- Industry research (Frontline Holiday Park/Campsite Visitor Survey, 2018) shows that less money per tourist/person is generated in the locality from static units than touring units.
- This application claims to reduce tourist numbers contrary to TVBC policy.

Impact on the character and appearance of the area

- It is not in a built-up area, and this kind of plan will completely ruin the rural aspect of Doctors Hill and its environs.

- The only definition of character of the area is provided by the Village Design Statement which forms part of the Local Development Framework and must prevail where the Local Plan is silent.
- The surface area of the proposed Dovecote lodge is approximately 4 times the size of an average caravan and so in total the surface area is far in excess of the existing units contrary to section 12 of the NPPF and Policies E1 and E2.
- The proposed development will make the application site more incongruous and out of character with the area and street scene, particularly with the proposed roofs being visible from the highways, public rights of way and on top of adjacent hills.
- Submitted plans are misleading as they identify different size static caravan units in different locations but this cannot be controlled unless secured by a section 106 agreement.
- Density is unacceptable and contrary to paragraph 5.30 of the TVBRLP and guidance within the Village Design Statement SPD.
- Although the number of lodges has been reduced, the proposal is still too intensive and invasive for its rural setting.
- Proposal will result in a loss of existing onsite green space.
- The current screening all round Hill Park Farm is inadequate even for the existing tourism site and should be increased significantly whether planning permission is granted or not.
- The proposed lodges need to be at least 15m away from the boundary hedges along Doctor's Hill and Branches Lane with substantial planning to obscure the lodges from view.
- Proposed planting scheme is inaccurate and misleading as it show planning on the Pound Farm side of the boundary.
- Proposed planting scheme is not specific enough to enable a fair and unbiased decision.
- The proposed planting will take many years to become mature trees giving adequate screening.
- Design, materials, character of the area, over development, trees.

Ecology

Onsite ecology

- There would appear to be no mention of a bat survey, this is inconsistent with other application submitted for properties along Doctors Hill and in the surrounding area.
- The application site is located within the Mottisfont Bat Conservation Area and the proposed development will definitely have a detrimental impact on the known bat population.

Appropriate Assessment

- Adverse impact to nutrient neutrality.
- Numbers submitted for current occupancy are incorrect and give the impression of no additional impact to the environment.
- TVBC know that this data is incorrect and subject to challenge, robust up to date must be supplied and calculations repeated.

- Empty vans on seasonal pitches do not contribute to effluence or other environmental impacts, the Local Planning Authority should validate these numbers rather than taking them on face value.
- No forward planning with data allowing for full occupancy seems to have been included.
- The application gives proposed occupancy rates ranging between 5.7% and 23.3% but these are based on 2014 data and are woefully out of date and not subject to independent scrutiny.
- On the ground observation by local residents and local councillors clearly show the site has a far higher occupancy rate than shown.
- Appropriate Assessment's are required to be precautionary, an application for a similar caravan park/camping site in neighbouring Landford was encouraged by Natural England to use maximum occupancy calculations for the proposed units, as is good practice to ensure a precautionary approach.
- This is particularly relevant for estimating impact of visitors on New Forest SPA and site sewage/water loading.
- Previously submitted data and calculations show that a site neutral development would be around 51 static units.

Impact on general amenity of the area

- Noise and light pollution.
- Proposed replacement of existing storage and camping areas with lodges will result in an increase disturbance to Doctors Hill.
- Amount of noise and light pollution will increase during winter months when the boundary vegetation is not in full leaf.
- Concern over proposed reuse of existing inadequate foul drainage infrastructure.
- Threatens the farming practice of adjoining land, noise and light making cows restless.

Impact on the amenity of residential property

- Overlooking.
- Serious concern on how any good neighbour policy can be enforced, given there will be no onsite management.
- Lack of amenity space for potential future occupants as there is very little decking for each lodge and space between the lodges.
- Loss of natural light and privacy to occupants of the lodges and neighbouring properties, contrary to Policy LHW4.

Highways

- Traffic Generation, Parking and Safety.
- Likely that the proposed lodges will require more than one onsite parking space, otherwise it could result on parking on Branches Lane and Doctors Hill verges.
- Branches Lane is unsafe for pedestrians.

Planning Conditions

- Officers should consider the types of restrictions placed on these type of units in holiday areas such as Devon where they have had much experience of the units becoming permanent residences.
- Not appropriate to load a planning permission with multiple conditions as these are hard to enforce and not transparent to members of the public.
- Officer recommendation for the previous application reference 20/02385/FULLS had eighteen conditions attached to it which is poor practice and suggests the application itself is not robust.
- TVBC should not rely on conditions to modify the application as it is known they will be difficult to properly enforce over time.
- The proposal will be more difficult to manage than it currently is as there will be no way of knowing the exact headcount at any one time as opposed to the self-restricting accommodation available in caravans and tents.

Other matters

Validation requirements

- The application should not have been validated as it is against the validation requirements, for example, there are no existing site plans, elevation plans and floor plans.

Application submission

- Information given in the applicant's statement about the viability of the Post Office and shop is misleading, claims that changes to support these businesses contradict previous planning applications.
- Proposal represents a 22% increase in the number of dwellings within Sherfield English parish.
- Proposal does not include any affordable housing provision of CIL contribution.

Addresses of third party representations

- Only positive comments are coming from Melchet Park located 2.5 miles away.

Enforcement and monitoring of conditions

- Concerns are partially grounded on the view that TVBC seem unable or unwilling to enforce conditions that apply to the existing caravan site let alone those that might be designed to mitigate the impact of these proposals.
- The proposed limited 1 month closure during winter months will enable people to live onsite as their main home for 11 months and go away during the intervening month, the site must remain closed for 4 months of the year.
- Material risk that all proposed mitigation measures to soften the impact of this proposal on its environment will quietly be forgotten or delayed indefinitely.

- If the Local Planning Authority grant planning permission without placing strict non residency conditions that are actively policed and enforced then the Local Planning Authority is setting policy precedence for housing infill within the village and around the Green Belt, which is strictly not allowed.

Private civil matters

- Very significant gains to the applicant if permission is granted.
- The applicant is submitting applications in the hope that residents get fed up objecting and to increase the value of the application site.
- Eventual plan is to develop the application site into a housing estate such as has happened in Sutton Scotney.

Processing of previous application

- Photographs previously presented at Planning Committee were misleading as they were taken during summer not winter months.
- In response to the previous application reference 20/02385/FULLS, the TVBC Economic Development officer made sweeping non-evidenced comments, which were later clarified by the case officer but this was too little, too late.

6.3 4 representations in total from various addresses – Support (summarised).

- Design, character of area.
- The proposed lodges will be more muted colours which will mean they will blend much better into the surroundings.
- Along with increased planting of hedgerows etc will only aid them blending in with the countryside.
- An occupancy restriction etc will also ensure the lodges will not become residential.
- The proposed development is much better suited having lodges for our village as opposed to the existing caravans, be they onsite or being taken to and fro.
- Reduce the amount of traffic along Branches Lane.
- Support the proposed development as it greatly benefits the community whilst assuring minimum disruption and impact on the environment and local area.
- It will also mean continued and increased employment in the area which is great for younger people growing up in the area, as well as more opportunities for local businesses.

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:

- Previous planning decisions
- 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 **Previous planning decisions**

The current application follows the refusal of the previous application reference 20/02385/FULLS (paragraph 4.7), with the reasons for refusal relating to the landscape impact on Branches Lane and Doctors in addition to the absence of a legal agreement securing an acceptable phasing of the development proposed. An appeal against this refusal has been submitted and is currently pending consideration with the Planning Inspectorate.

8.3 In assessing the previous application it was the view of the Local Planning Authority that conditions relating to the lodges themselves could not be imposed, as the scope of the application was limited to the change of use of the land only. As part of the appeal submission, the applicant has drawn attention to caselaw (*R Shave v Maidstone Borough Council*) whereby the court held that design could, in principle, be considered in relation to a proposed change of use involving objects or features that do not qualify as operational development. After reviewing the case law it was accepted as part of the Local Planning Authority's appeal submission that conditions relating to the design and appearance of the proposed lodges could be imposed. The assessment of the current application has therefore been undertaken on the basis that a condition controlling design details of the lodges can be imposed.

8.4 Third party representations have asserted the current application should be refused on the basis of the outcome of the previous application. However, the current proposal represents a significant change from the previously refused scheme following the reduction from 80 total pitches to 68 pitches and every application is required to be assessed on its own merits. This assessment is set out below.

8.5 **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*

8.6 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.

8.7 *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.

8.8 *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 confirm the proposed change of use will enable the use of lodges to be stationed onsite all year round with use ceasing during January, rather than positioned onsite and then subsequently removed on a seasonal basis. As such, it is not considered criterion (b) (iii) is applicable in this instance.

8.9 *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 the proposal complies with criterion (b) (iv).

8.10 *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.

8.11 *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.

8.12 Policy LE17

Third party representations have drawn reference to a conflict between the proposal and the criteria of Policy LE17 (Employment Sites in the Countryside). However, given the assessment set out above in relation to Policy LE18 and subsequent conclusion that the proposal complies with this policy as one of the policy exceptions listed under criterion (a) of Policy COM2 then it is not necessary to assess the proposal against Policy LE17.

8.13 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.

8.14 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.

8.15 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.

8.16 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.

8.17 **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.

8.18 *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; and*
- 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.*

8.19 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 from particular positions when travelling along Branches Lane from the south, with tents and caravans visible when the pitches are in use.

8.20 It is noted 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. 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 With regard to the impact of the proposed scheme it is noted the proposed pitches will be occupied by units onsite throughout the year including during the winter months, compared to the current operation that results in the existing pitches being unoccupied from November to March. It is also noted the proposed lodges are likely to be taller than the typical caravan units and tents which occupy the existing pitches.

- 8.22 However, in response to the refusal of the previous application and the reason for refusal listed as no.1, which identified the potential for harm to the wider landscape when viewed from Branches Lane and Doctors Hill, the current proposal has been reduced to 68 pitches in total compared to the previous scheme comprising 80 pitches. As a result, only 9 pitches are now proposed adjacent to Branches Lane reduced from the 11 pitches previously proposed in the same area of the application site. These proposed pitches remain orientated in an arrangement with the side elevations facing the public highway, to ensure there is visual separation between each individual unit.
- 8.23 As noted in paragraph 8.3 above, the LPA is now of the view a condition securing the submission and approval of external materials for the units occupying the proposed pitches can be imposed, following the receipt and subsequent review of relevant case law. Consequently, the imposition of such a condition enables the LPA will have control over the external appearance of the units and ensure a consistent style between all of the units to be stationed onsite.
- 8.24 In conjunction with the reduction to the number of pitches and control over the external appearance of individual units, the proposed scheme also includes additional landscaping planting along the western boundary of the application site. The proposed planting will serve to strengthen the screening provided by the existing vegetation and serve to soften the appearance of any units occupying the proposed pitches. The submitted planting plan and schedule 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 and serve to enhance the verdant character of Branches Lane and Doctors Hill. 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.
- 8.25 It is noted concern has been raised within third party representations to a lack of detail within the proposed landscaping scheme, and the proposed site plan is misleading as the type and of units occupying individual pitches cannot be controlled. However, it is not considered necessary for all of the proposed landscaping details to be provided within the application or for the size of units occupying individual pitches to be controlled in order to ensure the acceptability of the proposed scheme in planning terms.
- 8.26 Following the assessment undertaken above it is considered the amendments to reduce the number of pitches proposed, in combination with the proposed planting scheme and the imposition of a condition controlling the appearance of the units occupying the proposed development, are sufficient to ensure the current proposal overcomes the harm to the wider landscape attributed to the previous application reference 20/02385/FULLS.

- 8.27 In relation to the appearance of the access tracks and other internal landscaping works, this will be similarly in nature to the appearance 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.
- 8.28 Village Design Statement
Reference has been drawn to the Village Design Statement (VDS) within third party representations however, this document does not contain any specific guidance applicable to the type of development proposed. As the proposal is limited to the redevelopment of an existing tourism site, it is not considered that the proposed development is contrary to any of the guidance contained within the VDS.
- 8.29 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.
- 8.30 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.
- 8.31 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.
- 8.32 Consequently, it is not considered that the proposed scheme will result in an unacceptable arboricultural impact.
- 8.33 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. Consequently, the application is in accordance with Policies E1 and E2 of the TVBRLP.

8.34 **Ecology**

Onsite impacts

In support of the current application an updated preliminary ecological appraisal and roost assessment (Arbtech) has been provided and subsequently reviewed by the County Ecologist, with no objection raised subject to the imposition of conditions. The submitted assessment identifies the conditions onsite and the potential impact on protected species and habitats, as summarised below.

8.35 *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.

8.36 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. The submitted preliminary roost assessment identifies that the loss of these trees is unlikely to support bats. Any potential loss of habitat arising from the removal of these trees however 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.

8.37 *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.

8.38 *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.

8.39 *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.

8.40 *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.

- 8.41 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.
- 8.42 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.
- 8.43 *Third party representations*
Third party representations have raised concern that the application has not been supported by appropriate bat survey information but as identified above, an updated survey was submitted and reviewed by the County Ecologist.
- 8.44 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.
- 8.45 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.
- 8.46 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.

- 8.47 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.
- 8.48 *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 68 lodges for 11 months of the year with the application site closing down in January. 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 for a greater period of time and it is therefore considered necessary to review the potential impact on overall visitor numbers.
- 8.49 *Previous Appropriate Assessments*
Previously, under application reference 20/02385/FULLS, the Local Planning Authority (hereafter LPA) completed an appropriate assessment based on industry averages from tourism board surveys for in relation to different types of accommodation. However, the selection of a particular average to use for a particular type of accommodation is open to interpretation, as the breakdown above does not perfectly correlate with the particular type of accommodation brought onto site currently or the proposed lodges. It is also notable that the averages provided from the tourism surveys referred to above and other available surveys are a collation of data from a variety of different tourism sites in different regions.
- 8.50 It was therefore 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
- 8.51 *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. 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. In support of the current application, the applicant has also provided the raw booking data for 2022 and this exercise has been repeated.

- 8.52 Third party representations have raised concern with regard to the reliance on data provided by the applicant to calculate the existing level of visitors, but in the absence of any other data source which is bespoke to the application site, it is considered that this is the most appropriate and reasonable approach to identify visitor numbers. As discussed further below, where no relevant data is available then a precautionary approach has been adopted by using figures which represent a likely degree of overestimation such as the combination of March and October data for winter months.
- 8.53 With regard to the third party assertion for an alternative calculation based on the maximum numbers of bedrooms, for example the application of a 3 person occupancy average for 3 bedroom units, it is noted that such an approach is underpinned by an assumption that occupation is determined by the number of bedrooms. That assumption does not accord with the Natural England guidance on the calculation for residential dwellings which is calculated by the average household size rather than on the basis of bedroom provision. As such, this alternative approach would also incorporate a degree of projection that varies to the approach undertaken for different types of development. This includes identifying a figure for the existing tent and touring caravan accommodation whereby the size of individual units is not known has the potential to vary greatly on an individual basis. As such, it is considered that the use of the raw booking data is the most suitable approach.
- 8.54 *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 2.66 people per pitch when calculated across the whole dataset of 11 years, (up from the previous figure of 2.65 due to the inclusion of the 2022 booking data).
- 8.55 *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.
- 8.56 However, it is acknowledged the proposed lodges could serve to trigger an increase in the average occupancy per unit group size as a result of the potential perceived upgrade in tourism accommodation, when compared against the existing touring caravan and tent pitches. To identify the potential capacity following the reduction of the overall pitch numbers onsite an additional calculation has been undertaken, demonstrating that sufficient capacity exists for an overall reduction in visitor numbers even if the occupancy per unit group size increases to 4.3 people for the proposed lodges. Given that this represents

an increase of 61.6% from the current occupancy per unit group size of 2.66, it is considered that this buffer is sufficient to accommodate any potential increase in group sizes due to the upgrade in tourism accommodation arising from the installation of the proposed lodges.

8.57 *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. 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.

8.58 Following the analysis of both the 2014 and 2022 raw booking data, a combined average between the two figures for each calendar month was taken forward for the population comparison. 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 7.9% 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 of an average from late autumn/early spring is likely to be a modest overestimation of the visitor population and therefore is sufficiently robust.

8.59 *Conclusion*

The LPA's calculation concludes that the proposed development will result in a net reduction of 4,456 visitors overall and an overall reduction even in the scenario that average group sizes increase from 2.66 to 4.3 people per unit. Therefore, it is concluded that there will be no likely significant impact on the designated SPA arising from additional recreational pressure.

8.60 *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.

8.61 Offsite Impact on Designated Sites: Nutrient Loading

Solent and Southampton Water SPA/Ramsar, Chichester and Langstone Harbours 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.

- 8.62 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.
- 8.63 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.
- 8.64 *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.
- 8.65 *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.
- 8.66 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.
- 8.67 *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.
- 8.68 *Proposed budget*
A calculation has been undertaken to identify the nutrient budget to be generated by the proposed development. The 6,176 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 68 proposed lodges in total and therefore an overall occupancy rate of 0.25 (16.9 people / 68 units) per day has been used.

8.69 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 62.24 Kg/TN/yr has been identified for the proposed use of the application site, representing an overall reduction of 30.68 Kg/TN/yr.

8.70 Even in the event the proposed lodges result in an increase of group size to 4.3 as referred to in the preceding section on recreational pressure, the resulting nutrient budget calculation (10,622 visitors/365.25 calendar days/68 total lodges = 0.291 occupancy rate) identifies a total of 70.99 Kg/TN/yr that would be generated, representing an overall reduction of 21.93 Kg/TN/yr when compared to the existing scenario.

8.71 *Conclusion*

The proposed development will result in an overall net reduction of at least 21.93 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.

8.72 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.

8.73 **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.

- 8.74 *Criterion (a)*
In support of the application, a surface water and foul drainage assessment has been submitted, identifying the accommodation of surface water run-off from the associated lodges through the use of permeable paving for the proposed car parking area and internal access roads. As part of considering the previous application reference 20/02385/FULLS (paragraph 4.7) the Local Lead Flood Authority 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.
- 8.75 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 responded to the previous application raising no objection to this arrangement with reference drawn to the permitting process that is a requirement separate to the assessment of the planning application.
- 8.76 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).
- 8.77 *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).
- 8.78 *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).
- 8.79 *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.
- 8.80 *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.

8.81 **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.

8.82 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.

8.83 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 Environment Agency A licencing process are available. As such, it is considered that the proposal will avoid an adverse polluting impact arising from the generation of wastewater.

8.84 Light

Third party representations have raised concern the proposal will result in adverse light pollution, particularly during winter months when the existing boundary vegetation is not within full leaf. On this matter, it is noted that 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.

8.85 As a result, it is considered that sufficient controls have been secured to ensure the proposed scheme does not result in materially significant adverse light pollution impact on the general amenity of the area.

8.86 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 which will generate a level of noise during occupation currently or are a significant distance away from any residential property or neighbouring uses of a noise sensitive nature.

8.87 It is also acknowledged the proposal will result in the activity during winter months when at present, the use of the existing pitches ceases at this time. However, it is considered likely that any occupation during winter months will be predominantly confined to the lodges themselves and therefore, the potential for significant noise generation impacting neighbouring properties will be significantly reduced. Consequently, whilst the concerns raised by third party representations are noted, it is considered the proposal will avoid a materially significant level of noise pollution.

8.88 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.

8.89 Impact on visitors

Third party representations have also raised concern that the proposed scheme does not provide sufficient amenity space or intervening space between individual units for the potential future occupants of the proposed development. 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.

8.90 Impact on adjoining land uses

Furthermore, concern has been raised in relation to the relationship between the proposed development and the adjoining agricultural fields that form part of the holding known as Pound Farm. However, given the current use of the application site as an existing campsite and the existing boundary vegetation whether it is located on within the Pound Farm holding or within the application site, it is considered the proposed development will not serve to prevent or disrupt the adjoining agricultural use in a materially significant manner.

8.91 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.

8.92 **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.

8.93 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.

8.94 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.

8.95 **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.

8.96 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.

8.97 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. Additional concern has been raised on the basis the proposal will prevent the application site from operating a good neighbour policy but this is a private civil matter.

8.98 Consequently, it is considered that the proposal sufficiently provides for the amenity of residential property in accordance with Policy LHW4 of the TVBRLP.

8.99 **Highways**

Access

The proposed scheme does not include any alterations to the existing vehicular access onto Branches Lane. In reviewing the previous application reference 20/02385/FULLS (paragraph 4.7) the Highways Officer responded confirming the change of use to lodge type 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.

8.100 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 the proposed scheme will avoid any materially significant increase in vehicle movements.

8.101 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.

8.102 Third party representations have raised concern the use of Branches Lane by pedestrians is currently unsafe however this assertion is not supported by any substantive evidence and in any case, it is not evident how the proposed development would give rise to an additional adverse impact to the safety of users of this public highway. Consequently, it is not considered this concern forms a reasonable basis for refusing the current planning application.

8.103 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.

8.104 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.

8.105 Crime and community safety

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.

8.106 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.

8.107 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 design, trees, landscape, ecology, drainage and highway measures.

8.108 Third party representations have commented that the imposition of a large number of conditions represents poor practice and arises from an inadequate submission. For the rationale set out in the assessment above, it is considered all of the conditions contained within the officer recommendation below are in accordance with the guidance set out within the NPPG for conditions to be necessary, relevant to planning and the proposed development, enforceable, precise and reasonable in all other aspects.

8.109 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.

8.110 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.

8.111 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.

8.112 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.

8.113 **Other matters**

Validation requirements

Concern has been raised that the application does not comply with the relevant validation requirements on the basis that no existing site plan, floor plans or elevations have been provided. However, as set out above, the proposal is for a change of use only and the use of the application is currently for the stationing of caravans and tents. It is therefore not necessary for the application to be supported by existing floor plans or elevations. Furthermore, the existing layout of the application site is provided on drawing reference 102 Rev D. Consequently, it is considered sufficient information has been submitted to satisfy the relevant validation requirements.

8.114 *Application submission*

Third party representations have challenged the assertion within the application submission that the proposed development is required for the viability of the onsite post office, but it is not necessary to assess this matter in order to determine the planning merits of the application. Concern has also been raised with regard to the lack of affordable housing provision and CIL contribution but there is no policy basis or requirement for these contributions to be secured in order to ensure the proposal is acceptable in planning terms.

8.115 *Addresses of third party representations*

Reference has been drawn to the addresses of third parties that have submitted representations in support of the application, however this is not a material consideration.

8.116 *Enforcement and monitoring of conditions*

Concern has been raised in relation to the ability of the Local Planning Authority to effectively monitor and enforce planning conditions. However, any information received in relation to a potential breach of planning control is investigated by the Local Planning Authority's enforcement team.

8.117 *Private civil matters*

Third party representations have raised a number of concerns that do not form material considerations, including matters related to the applicant's intentions and the prospect of subsequent applications. As a result, these have not been included in the assessment set out above.

8.118 *Processing of previous application*

Reference has been drawn within third party representations to the processing of the previous application including the comments from the Economic Development officer and the photographs within the officer presentation to Planning Committee. However, every application is assessed on its own merits and matters relating to the processing of the previous application are therefore not relevant.

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. This recommendation is subject to a satisfactory consultation response from Natural England to the appropriate assessment undertaken and the completion of a legal agreement securing an appropriate phasing of the development.

10.0 **RECOMMENDATION**

Delegate to the Head of Planning and Building for the following:

- **Receipt of a satisfactory consultation response from Natural England**
- **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:**
Site Location Plan (102 D)
Landscape Masterplan (Figure 9 P8)
Soft Landscape Details Sheet 1 of 2 (501 D)
Soft Landscape Details Sheet 2 of 2 (502 D)
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 68 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 February 2023.**

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. 7) 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 what-so-ever 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 Appraisal and Preliminary Roost Assessment (Arbtech April 2023), 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 works to enable the formation of the tracks and pitches hereby permitted shall take place, until details of a scheme of ecological enhancement measures to be incorporated within the development 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 of the Test Valley Borough Revised Local Plan (2016).

- 13. Notwithstanding the information provided for the western boundary, no works to enable the formation of the tracks hereby permitted shall take place, 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 Policies E1 and E2 of the Test Valley Borough Revised Local Plan (2016).

- 15. Prior to the stationing of any static caravans on the pitches hereby approved, details of exterior materials and colours of the static caravans shall be submitted to and approved in writing by the Local Planning Authority. Only caravans constructed in accordance with the approved details shall be positioned on the pitches hereby approved.**

Reason: To ensure that the development protects, conserves and enhances the landscape character of the area, in accordance with Policy E2 of the Test Valley Borough Revised Local Plan (2016).

- 16. 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: 16th 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).

- 17. 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).

- 18. 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).

- 19. 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.**
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