

ET Planning

Client:

Ruben Reed Jnr

Fairlands

Church lane, Swallowfield

Planning application for the change of use of land to extend an existing Holiday Park to comprise 17 caravans for tourist accommodation, one site office, bin storage area and associated landscaping

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1. Introduction

1.1 This statement is produced to support a planning application for the change of use of land to extend an existing Holiday Park to comprise 17 caravans for tourist accommodation, one site office, bin storage area and associated landscaping at Fairlands, Church Road, Farley Hill, Wokingham, RG7 1TU.

1.2 The legal definition of a caravan was established in the Caravan Sites and Control of Development Act 1960. This was further modified in 1968 to include twin-unit mobile homes and again in 2006 when the dimensional criteria of caravans were increased.

1.3 Section 29 (1) of the Caravan Sites and Control of Development Act 1960 defines a caravan as:

"...Any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether 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 system, or;*
- b) Any tent."*

1.4 Section 13 (1) of the Caravan Sites Act 1968, which deal with twin-unit caravans, provides that:

"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 and other devices; and*

b) Is, when assembled, physically capable of being moved by road from one place to another (whether being towed, or by being transported on a motor vehicle or trailer), shall not be treated as not being (or have been) a caravan within the mean of Part 1 of the Caravan Sites and Control of Development Act 1960 by reason only that it cannot lawfully be moved on a highway when assembled."

- 1.5 The definition of a caravan was further amended by Paragraph 3 of Article 3 of the Social Landlords (Permissible Additional Purposes) (England) Order 2006 to specify the following dimensions:
 - A) Length (exclusive of any drawbar): 20m (65.6ft)
 - B) Width: 6.8m (22.3ft)
 - C) Overall height (measured internally from the floor at the lowest level to the ceiling at the highest level): 3:05m (10ft)
- 1.6 The caravans which are proposed to be stationed at the site fall within the above definition, and therefore do not themselves constitute operational development in accordance with Section 55 of the Town and Country Planning Act 1990 (as amended). Planning permission is therefore sought for the change of use of the wider parcel of land as a park home holiday site, to expand the offering currently available.
- 1.7 This planning and heritage statement will cover the background to the application and provide the necessary information to enable its determination by officers at the Council. It will consider the proposal in light of relevant planning policies and other material considerations. The conclusion reached is that key material considerations and the wider objectives of National and Local planning policy support the grant of permission.
- 1.8 In addition to this planning statement, the application is accompanied by the appropriate planning application forms and ownership

certificate, duly signed and completed, and the following plans and documents:

- Site Location Plan
- Proposed Site Plan
- Setting Out Plan
- Preliminary Ecological Appraisal
- Landscape Proposals
- Proposed Surface and Foul Water Drainage Layout
- Sustainable Drainage Assessment

1.9 The relevant application fee of will be submitted by the applicant separately.

2. Site Location and Description

- 2.1 The site comprises approximately 0.43 hectares and is situated to the south of Church Road in Farley Hill.
- 2.2 Access to the site is taken from Church Road and the existing access will be retained as part of the proposed development.
- 2.3 The wider site is in a mixed use of equestrian and residential. Part of the site that forms the proposed development site currently operates as a mobile home park for tourist accommodation.
- 2.4 The site is located within Flood Zone 1 which carries the lowest risk of fluvial flooding. The site does not contain any listed buildings and there do not appear to be any ecological designations.

3. Planning History

- 3.1 The relevant planning history for the site is set out below.
- 3.2 Application Ref: 242813 – Full application for the proposed realignment of existing gravel track with creation of new access off existing drive to provide access to holiday park, including partial demolition of existing wall. Approved 22/01/2025
- 3.3 Application Ref: 231960 – Full application for the proposed change of use of land from agricultural to holiday park with the siting of 8 no. static caravans, 1 no. office cabin, 1 no. washing block and 4 no. bin stores (part retrospective). Approved 10/11/2023
- 3.4 Application Ref: 182991 – Application to vary condition 1 to remove named occupants and remove condition 2 of appeal planning consent (F/2011/2602). Refused 24/12/2018

- 3.5 Application Ref: 153209 – Application to vary condition 1 of appeal planning consent F/2011/2602 dated October 2014 for the change of use of land to allow Billy and Emma Cole to lawfully occupy the pitch. Refused 28/06/2016
- 3.6 Application Ref: F/2011/2602 – Proposed change of the use of land for the stationing of caravans for residential purposes for 4 no. gypsy pitches together with the formation of additional hard standing and utility/ dayrooms ancillary to that use and removal of two disused stable blocks. Temporary permission granted by Appeal (APP/X0360/A/13/2195054) on 08/10/2014 for four pitches on a four-year temporary basis.
- 3.7 Application Ref: F/2010/2809 – Proposed change of use and engineering works to provide hard standing for 8 caravans. Retention and relocation of amenity building. Refused 04/02/2011
- 3.8 Application Ref: F/2009/0273 – Application for the change of use of land from Agricultural to Touring Caravan Park (Retrospective). Application withdrawn 22/04/2009

4. Development Proposals

- 4.1 The National Design Guide (2019) identifies that “well-designed homes and buildings are functional, accessible and sustainable. They provide internal environments and associated external spaces that support the health and well-being of their users and all who experience them. They meet the needs of a diverse range of users, taking into account factors such as the ageing population and cultural differences. They are adequate in size, fit for purpose and are adaptable to the changing needs of their occupants over time” (para 120-121).

- 4.2 Regarding the requirements of NPPG Paragraph: 029 Reference ID: 14-029-20140306 in respect of Design and Access Statements, the proposal is described as follows:
- 4.3 **Use and Amount:** The proposed development is for the change of use of land to extend the existing holiday park to increase the number of pitches from 8 to 17 with a site office.
- 4.4 **Layout and Scale:** The proposed pitches are set out in a regular pattern. The static caravans will all be single storey in height and all formally meet the statutory definition of a caravan.
- 4.5 **Landscaping:** There is an existing leylandii hedge around the border of the site and this is proposed to remain insofar as possible as part of the development.
- 4.6 A landscaping proposal plan has been submitted in support of the planning application.
- 4.7 **Appearance:** The caravans would conform to the legal definition of a 'caravan' and therefore their final external appearance is yet to be defined and would not be up for consideration as part of this application.
- 4.8 Bin storage and a site office are also to be provided on site. Due to the wider context of the site and extremely minimal public views into the site, the appearance of the proposed development does not detract from the wider area.
- 4.9 **Access & Parking:** Each pitch benefits from a car parking space. Access is to be gained from the existing access on to Church Road and there are no changes proposed to this as part of this application.

5. Policy Assessment

- 5.1 **National Guidance:** The National Planning Policy Framework (NPPF) is a relevant material consideration to the application.
- 5.2 The purpose of the planning system is to contribute to the achievement of sustainable development. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. Paragraph 39 of the NPPF states that "Local planning authorities should approach decision on proposed development in a positive and creative way" and "at every level should seek to approve applications for sustainable development where possible". Paragraph 124 of the NPPF comments that planning should "promote an effective use of land" in "meeting the need for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions".
- 5.3 Paragraph 61 confirms the Government's objective to boost the supply of housing, and paragraph 8 identifies the three objectives of sustainable development, as economic, environmental and social.
- 5.4 Paragraph 131 identifies that "Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities", whilst paragraph 139 states that significant weight should be given to "outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings."
- 5.5 The National Design Guide builds on the above, and clarifies that "well-designed neighbourhoods need to include an integrated mix of tenures and housing types that reflect local housing need and market

demand. They are designed to be inclusive and to meet the changing needs of people of different ages and abilities. New development reinforces existing places by enhancing local transport, facilities and community services, and maximising their potential use” (para 109).

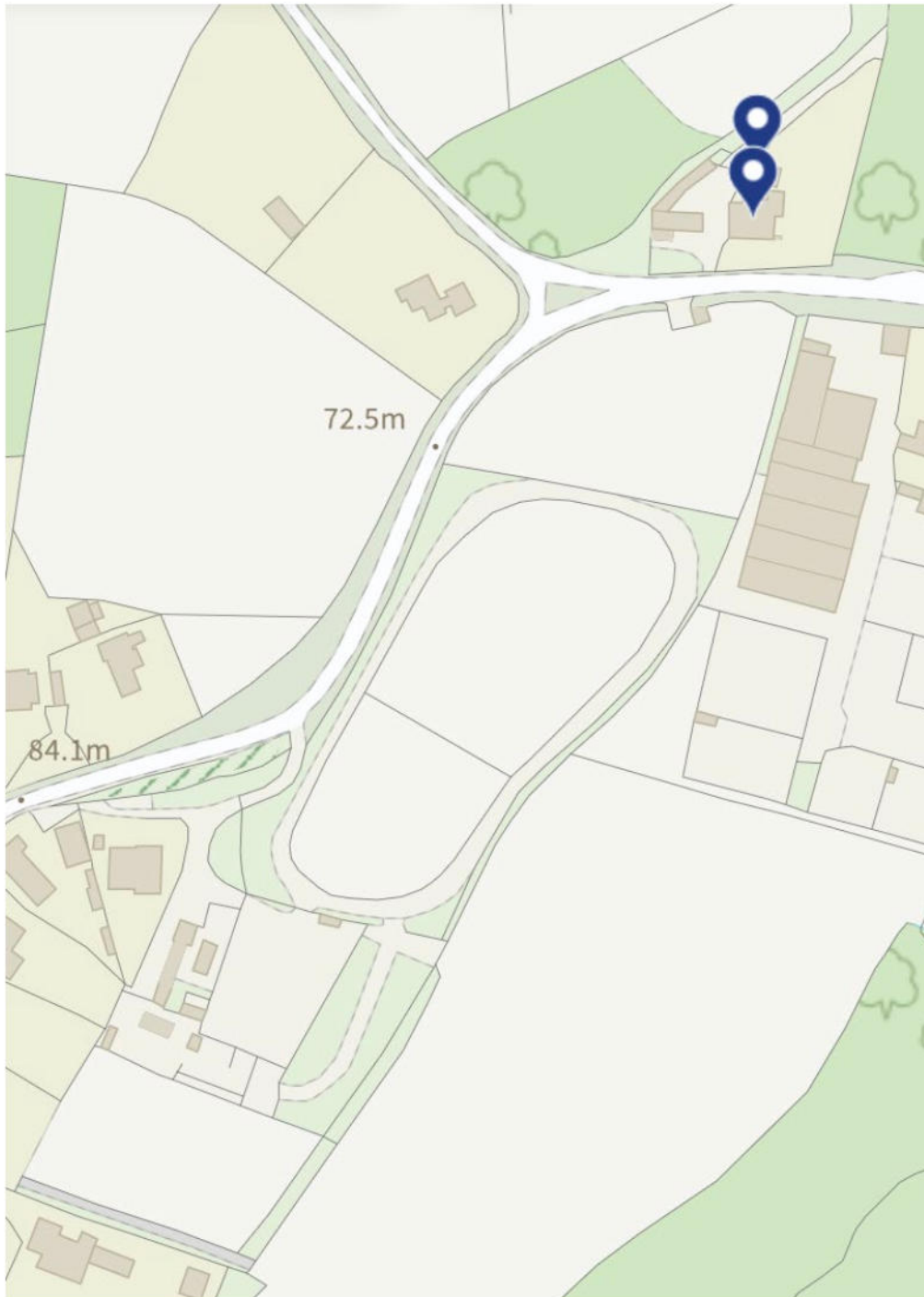
- 5.6 **Principle of Development:** Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 5.7 Wokingham Borough Council’s Development Plan which is relevant to the proposal includes the following:
 - Core Strategy Development Plan Document (2010)
 - Managing Development Delivery Local Plan (2014)
- 5.8 In addition to the above, it should be noted that Wokingham Borough Council are updating their Local Plan. However, this document is still unadopted, as such less weight can be given.
- 5.9 At the national level, paragraph 85 of the NPPF states that decisions should help create conditions in which businesses can invest, expand and adapt. Therefore, significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 5.10 Paragraph 88 further states that development in rural areas should *“support the sustainable growth and expansion of all types of business in rural areas”*. This includes the development and diversification of agricultural and other land based rural businesses. Furthermore, paragraph 89 affirms that *“planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or*

beyond existing settlements, and in locations that are not well served by public transport".

- 5.11 Likewise, paragraph 96 states that planning decisions should aim to achieve healthy, inclusive and safe places, which enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling. Many areas for these activities exist within a reasonable distance to the proposal site. Examples include Bramshill Forest, Wellington Country Park, equine facilities and many Golf Courses.
- 5.12 Policies CP3 and CP11 of the Core Strategy set out the general principles for the development and details for proposals outside the Development Limits (including countryside) respectively.
- 5.13 Policy CP11 states that in order to protect the separate identity of settlements and maintain the quality of the environment, proposals outside of development limits will not normally be permitted. There are exceptions to this, including proposals where:
- 1) *It contributes to diverse and sustainable rural enterprises within the borough, or in the case of other countryside based enterprises and activities, it contributes and/or promotes recreation in, and enjoyment of, the countryside; and*
 - 2) *It does not lead to excessive encroachment or expansion of development away from the original buildings; and*
 - 3) *It is contained within suitably located buildings which are appropriate for conversion, or in the case of replacement buildings would bring about environmental improvement*

- 5.14 The proposed development is to extend an existing holiday park to accommodate 17 pitches and site office, an increase from an 8 no. pitch static caravan holiday park. This type of development contributes and promotes recreation in, and enjoyment of the countryside, in line with Policy CP11.
- 5.15 The static caravans are proposed to be set out and suitably arranged to make the most efficient use of land.
- 5.16 The very essence of a static caravan holiday park is to enjoy the benefits of the countryside, as such this is a suitable location for this particular use to be situated. It is therefore in accordance with Policy CP11 and has previously been found acceptable in principle in this location.
- 5.17 The existing operation of the holiday park should be taken into account. The Applicant has provided booking forms for the existing 8 mobile homes and these can be found at **Appendix 1**. It is clear that there has been a very high demand for this type of holiday park in this particular location and this can clearly be evidenced. The expansion of the park therefore should be seen as a way to support and enhance this business. The expansion of the site therefore presents an opportunity for visitors to stay in this location with a large breadth of tourist-based destinations in the wider area. The use of a private car to access facilities and attractions should not be seen as unreasonable as it follows the same principles of the existing use on site.
- 5.18 In summary, the principle of development would be acceptable. It does not erode the environmental qualities of the Wokingham countryside and maintaining the separate identity of the closest neighbouring settlements complying with the objectives of CC02 and CP11.

- 5.19 **Employment:** The proposed development would continue to facilitate local employment through the employment of cleaning, laundry and groundsman/gardening staff to maintain the site and clean each unit and change the laundry between occupants.
- 5.20 **Character and Appearance of the Area:** Policy CP3 requires development to be appropriate to the character of the area and be of a high-quality design. To this extent the locality comprises a semi-rural location with residential development within the wider context of the site. It is also important to note the existing holiday park is already operating so.
- 5.21 Due to the containment of the site, coupled with the existing operation of the holiday park, there is very little impact on the character and appearance of the area. As the proposed development only seeks to extend the holiday park, the introduction of the additional land and the additional mobile homes to the site will not impact the character of the area in a negative manner.
- 5.22 Given the context of the site and the appropriate design and scale of the proposal, it would not result in unacceptable harm to the character of the countryside and thus would accord with Policies CP11 and CP3 in this regard.
- 5.23 **Heritage:** The site does not sit within a Conservation Area however is an Area of Special Character. The site itself does not contain a Listed building however the land adjacent is an open sloping site and provides the setting for a Grade II* Listed building at the base of the sloping site.
- 5.24 The building at the base of the hill (shown by the blue flags) is Grade II* Listed.



- 5.25 The Listed building at the base of the hill has high aesthetic value within the rural setting. The local area has a strong rural character with a sense of remoteness and a traditional vernacular nature. Field boundaries of traditional fencing, hedgerows and mature trees contribute heavily to this setting. The rural nature of the setting is a large contributor to the value of place for the heritage asset.

- 5.26 The agricultural building collection however at the top of the hill including the site in question is of a low quality and is heavily screened by vegetation. It is of no known historical significance and it makes little or no contribution to the setting.
- 5.27 There are no proposed changes to the Listed Building or its curtilage. The proposed location for the pitches is heavily screened from all approaches and low key in nature. There is no loss of historic fabric. The proposals are considered to have little or no impact upon the heritage setting and therefore there is no heritage harm from the proposals.
- 5.28 **Residential Amenity:** Policy CP3 of the Core Strategy seeks to protect neighbouring residential amenities.
- 5.29 Due to the contained nature of the site, there is no impact from the proposed development on the residential amenity of nearby neighbours.
- 5.30 The caravans would be single storey and would not be able to view any neighbouring properties or their private amenity spaces owing to boundary treatment. In any case the application would not be introducing a new use to the wider site with the site already being in operation.
- 5.31 Each pitch benefits from a separate private amenity space for 'sitting out'.
- 5.32 **Trees and Landscaping:** There are no protected tree on site. A Landscape Plan has been submitted to show the development proposals and impact on existing landscaping and proposed landscaping as a result of this application.
- 5.33 **Transport and Parking:** Paragraph 116 of the NPPF states that, *"Development should only be prevented or refused on highways*

grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

- 5.34 The increase in traffic as a result of the proposed development compared to the existing use of the site as a five-pitch certified caravan site is not considered to result in an unacceptable impact on highway safety.
- 5.35 The existing access to the site is to be retained and used as part of this proposal.
- 5.36 A car parking space is to be provided on each proposed pitch. This is considered to be a sufficient provision of parking on-site for the proposed use.
- 5.37 The application is therefore considered acceptable in this regard.
- 5.38 **Refuse Provision:** Communal bin storage has been provided for the proposed pitches.
- 5.39 Individual refuse bins can also be stored on each plot. Private collection would be arranged.
- 5.40 **Drainage and SuDS:** The application site is not within any designated flood zones and is less than 1 hectare in size, as such a site-specific flood risk assessment is not required.
- 5.41 A proposed Surface and Foul Water Drainage Layout and Sustainable Drainage Assessment has been prepared and submitted in support of the application. The report assesses the feasibility of a range of Sustainable Drainage Scheme (SuDS) options in support of the Site development process. A SuDS strategy is proposed to ensure surface water runoff can be managed effectively over the lifetime of the development.

- 5.42 The proposed development is therefore deemed acceptable in this regard.
- 5.43 **Ecology:** Policy CP3 states that development proposals will be granted where they have no detrimental impact upon ecology and CP7 states that the degree of protection afforded to biodiversity designations will be appropriate to their status.
- 5.44 A Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment has been prepared and submitted in support of the planning application.
- 5.45 The survey shows that the site's habitats are of no more than site level ecological value and are not irreplaceable or Priority Habitats.
- 5.46 The site is unlikely to support protected and notable species, and therefore subject to precautions, are unlikely to affect these. There are opportunities for biodiversity enhancements of benefit to notable and protected species.
- 5.47 The Biodiversity Metric calculation tool demonstrated the on-site baseline biodiversity value is 1.25 habitat units and 0.35 hedgerow units. Post-development, the proposed plans will result in a net gain of +13.36% in habitat units. Hedgerow units will achieve a gain of 54.46%.
- 5.48 The proposed development is therefore considered acceptable in this regard.
- 5.49 **Community Infrastructure Levy:** The relevant completed forms have been submitted alongside this application.

6. Conclusion

- 6.1 This statement has demonstrated that the proposed development is acceptable in principle and makes an efficient use of land.
- 6.2 Material planning considerations have been carefully considered and analysed, as evidenced in section 5 of this statement and the supporting plans and documents. It is considered the proposed development would contribute and promote recreation in, and enjoyment of, the countryside, without adverse effect on the character of the area or the amenity of neighbouring residents. Through the operation of the current holiday home park, it has also been demonstrated that this use is acceptable in this location, and the proposed development seeks to build upon this.
- 6.3 It is considered that the proposed scheme complies with relevant Development Plan Policies and is further supported by National Guidance. Therefore, it is respectfully requested that planning permission is granted.



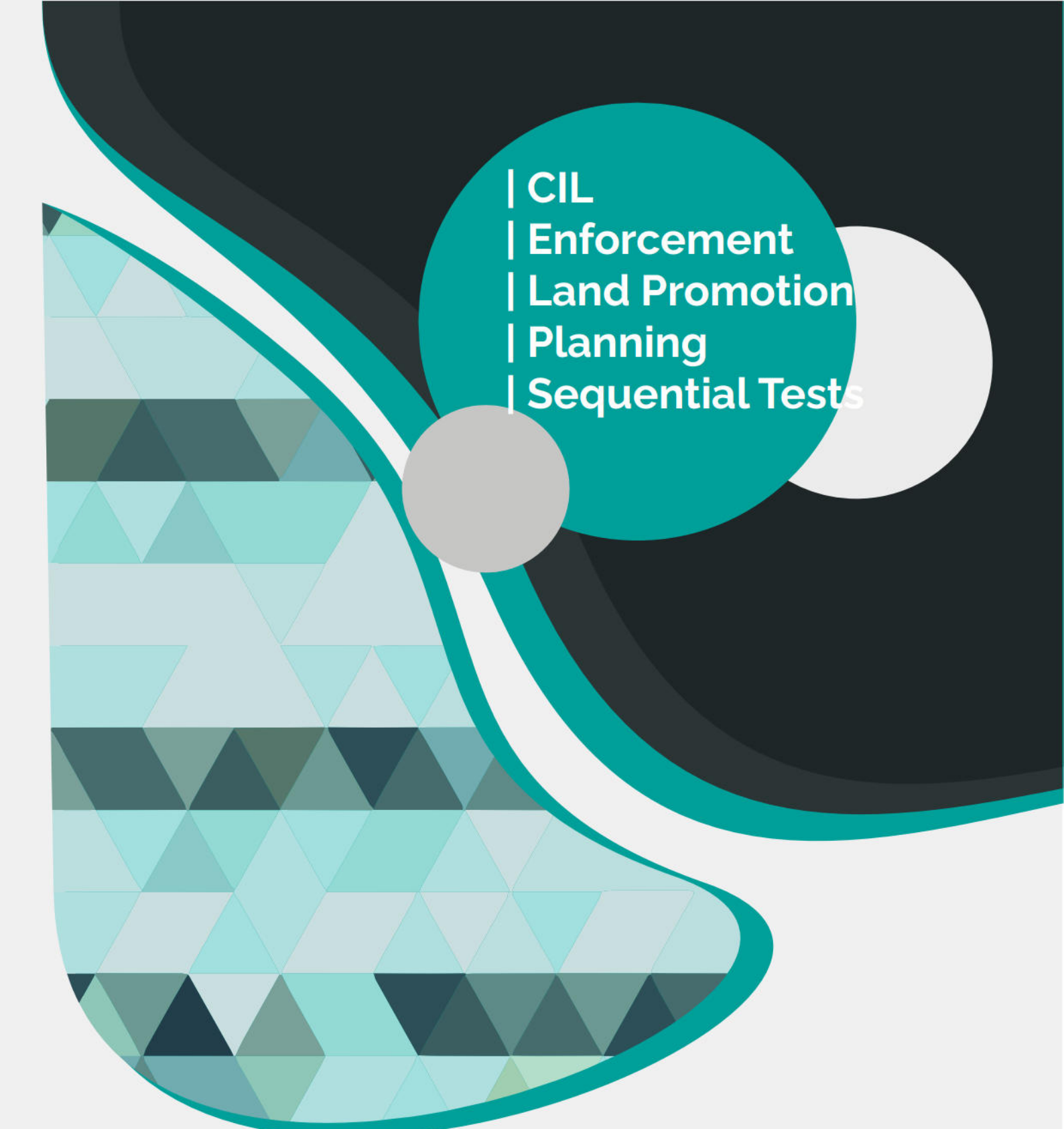
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Appendix 1 – Booking Forms



| CIL
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