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| MEETING: | PLANNING AND REGULATORY COMMITTEE |
| DATE: | 13 OCTOBER 2020 |
| TITLE OF REPORT: | <p>194418 - RE-ORGANISATION AND UPGRADE OF THE EXISTING 'BLEATHWOOD LODGES COUNTRY PARK' TO INCLUDE DEMOLITION OF EXISTING SITE BUILDINGS, THE CHANGE OF USE OF THE ON-SITE RESIDENTIAL PROPERTY FOR HOLIDAY LET, THE CONSTRUCTION OF A REPLACEMENT FACILITIES/MEET AND GREET BUILDING, MAINTENANCE BUILDING, AND THE PROVISION OF ACCOMMODATION IN THE FORM OF 45 LODGES, WITH ASSOCIATED ACCESS AND PARKING AT THE OLD HOPYARD, BLEATHWOOD, LUDLOW, SY8 4LP</p> <p>For: Mr Vail per Miss Elle Cass, Slr Consulting Limited, 2nd Floor Hermes House, Holsworth Park, Oxon Business Park, Shrewsbury, SY3 5HJ</p> |
| WEBSITE LINK: | https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=194418&search-term=194418 |
| Reason Application submitted to Committee – Redirection | |

Date Received: 27 December 2019

**Ward: Leominster
North & Rural**

Grid Ref: 357086,268393

Expiry Date: 9 April 2020

Local Member: Councillor John Stone

1. Site Description and Proposal

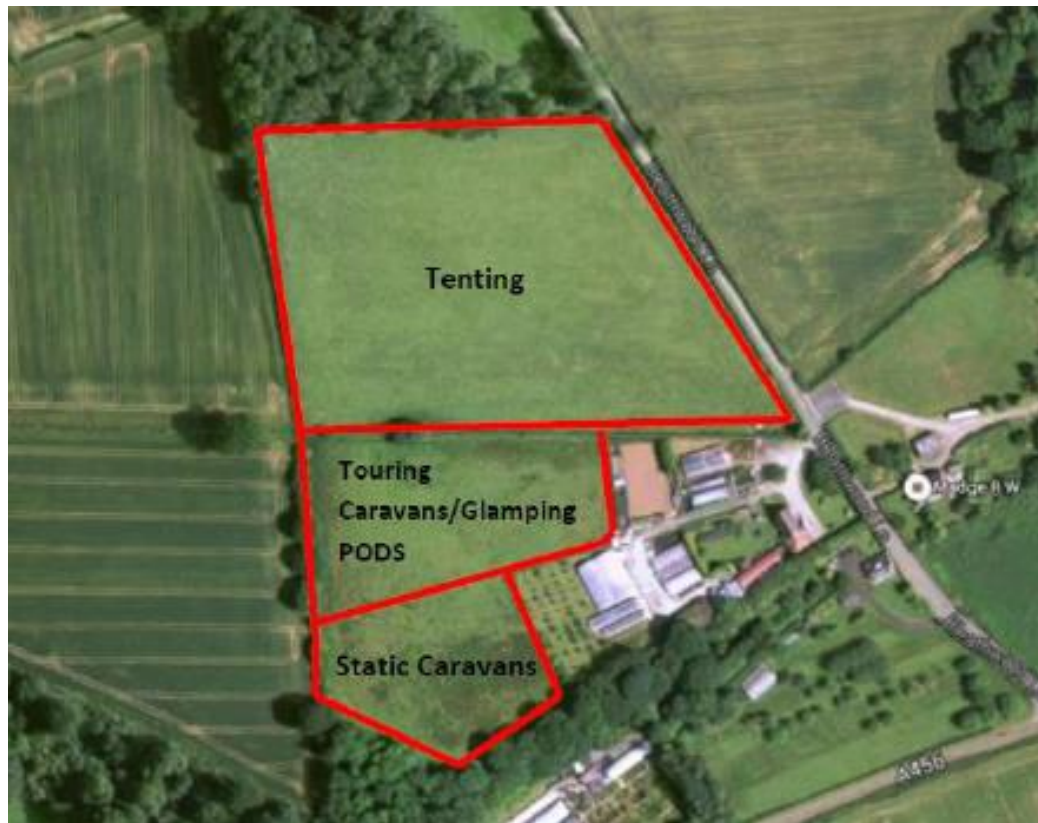
- 1.1 The application is located in an open countryside outside any market town or settlement listed under Herefordshire Core Strategy policy RA2 and is accessed from a rural lane which is accessed from the A465 between Little Hereford to the West and Tenbury to the East. The Site is located on the border of Shropshire and Herefordshire, located just within the northern boundary of Herefordshire.
- 1.2 The site's established access is from Bleathwood Lane, which adjoins the A456 approximately 50m to the south east of the site. The A456 connects the site to surrounding services and villages, such as the market town of Tenbury Wells, located approximately 2 miles away. Ludlow is also accessible via the A456 and A49, located approximately 8 miles away. Ludlow is the largest town in south Shropshire, and is home to a range of tourist attractions. The local road network and Public Rights of Way as they relate to the application site, filled red, are shown on the plan below
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1.3 The Site is approximately 4.8 hectares, and comprises 2 large fields and a number of buildings that accommodate –

- the Owner's House & Annexe (a 3-bedroom, 1976 build, brick construction and externally rendered)
- Bar/Cafeteria which seats approx. 150
- Boxing Gym
- Toilet Block
- Associated nursery buildings, including
 - 1 industrial glass house which has been timber clad
 - 2 polytunnels
 - 2 greenhouses
 - 1 large industrial greenhouse/workshop, and
 - 1 corrugated, steel storage shed

1.4 The existing use is described as *Bleathwood Lodges Country Park and Boxing Gym*. The land use division vis-à-vis tourism activities approved under planning permission 153741 is shown below along with photographs of the site and existing development –



- 1.5 The Site benefits from planning consent for the accommodation/siting of 60 touring pitches, 100 tent pitches, 6 static caravan pitches and 8 glamping pods for holiday let only (all year round). It is therefore already considered to be a significant tourism site.
- 1.6 The site topography falls approximately 10m from the north west to the south east of the site and the fields are grassland surrounded by mature hedgerows with mature hedgerow trees to the north and south. A Public Right of way (PROW), bisects the site running east-west through the centre.
- 1.7 The site is not subject to or does it contain any nature conservation or heritage designations and is not within any nationally designated landscape areas.
- 1.8 The application was originally deposited, advertised and consulted on as *Re-organisation and upgrade of the existing 'Bleathwood Lodges Country Park' to include demolition of existing site buildings, the change of use of the on-site residential property for holiday let, the construction of a replacement facilities/meet and greet building, maintenance building, and the provision of accommodation in the form of 60 lodges, with associated access and parking.*

- 1.9 Further to comments received and review of the proposals, amended plans were submitted and a revision to the proposal made reducing the number of lodges to 45, a reduction of 25%. A full public re-consultation was carried out on that basis and it is that reduced quantum of development that is assessed and considered here and a Masterplan of the proposals is shown below –



- 1.10 Amended Plans have also been received which has resulted in changes to the proposed built-form, reducing the size of the meet-and-greet building by 27% and simplifying the housekeeping building. As part of that design review and comments received on the colour and architectural treatments of both buildings, further amendments have been made from the original submitted information. This is explored and assessed within the *Design* part of the report in section 6 below.
- 1.11 Along with application form, signed completed certificates and existing and proposed plans, the application is accompanied by the following documents –
- Planning Statement
 - Design and Access Statement
 - Landscape and Visual Impact Assessment
 - Landscape Strategy
 - Transport Assessment
 - Travel Plan
 - Arboricultural Survey
 - Noise Management Plan
 - Ground Risk Assessment
 - Flood Risk Assessment
 - Drainage Strategy
 - Phase 1 Species and Habitat Survey
 - Economic Statement
- 1.12 For clarity it is emphasised that all of the existing buildings on the park are to be removed/demolished apart from the house adjacent to the park entrance, which will be retained, and the use changed to a single unit holiday letting unit, with private garden areas.

- 1.13 The proposal for numerical comparison, is to replace the consented 6 lodges, 8 pods, and the touring (60) and camping fields (100), along with the Bluestone Centre (boxing and fitness centre) and 150 capacity bar/restaurant, with 45 static lodges and supporting infrastructure.

2. Policies

2.1 Herefordshire Core Strategy

SS1 – Presumption in favour of sustainable development
SS2 – Delivering new homes
SS3 – Releasing land for residential development
SS4 – Movement and transportation
SS6 – Environmental quality and local distinctiveness
SS7 – Addressing climate change
OS1 – Requirement for open space, sport and recreation
OS2 – Meeting open space, sport and recreation needs
MT1 – Traffic management, highway safety and promoting active travel
LD1 – Landscape and townscape
LD2 – Biodiversity and geodiversity
LD3 – Green infrastructure
LD4 – Historic environment and heritage assets
SD1 – Sustainable design and energy efficiency
SD3 – Sustainable water management and water resources
SD4 – Waste water treatment and river water quality

- 2.2 The Herefordshire Local Plan Core Strategy policies together with any relevant supplementary planning documentation can be viewed on the Council's website by using the following link:

- 2.3 The Core Strategy policies together with any relevant supplementary planning documentation can be viewed on the Council's website by using the following link:-

https://www.herefordshire.gov.uk/info/200185/local_plan/137/adopted_core_strategy

2.4 Brimfield and Little Hereford Group Neighbourhood Development Plan

The Neighbourhood Plan was made on 22 July 2016 and now forms part of the Development Plan.

The relevant policies of this plan are considered to be :

BLH8 – Building Design Principles
BLH9 – Landscape Design Principles
BLH12 – Water Management
BLH13 – criteria for assessing the suitability of future potential development sites
BLH15 – Design for Flood resilience and resistance
BLH16 – Design to Reduce Surface water run off
BLH18 – Developments Supporting Rural Enterprise

Link to NDP:

<https://www.herefordshire.gov.uk/directory-record/3039/brimfield-and-little-hereford-group-neighbourhood-development-plan-made-22-july-2016>

3. Planning History

- 3.1 **194095** – EIA Screening opinion for proposed re-organization and upgrade of the existing Bleathwood Lodges County Park to include demolition of existing site buildings, the conversion of the on-site residential property into holiday use, the construction of a replacement facilities/meet and greet building, and the provision of accommodation in the form of 60 lodges – Environmental Statement not required
- 3.2 **153741/F** – Change of use of land from agriculture to camping site (tents and eight glamping), touring caravan site and up to six holiday static caravans with associated electric hook ups and access drive – Approved w/conditions
- 3.3 **151995** – Proposed removal of condition 2 of planning permission 76/151 to remove agricultural tie – Approved w/conditions
- 3.4 **141227/F** – Extension to existing facilities – Approved w/conditions
- 3.5 **132315/F** – Development of site as boxing academy (Retrospective) – Approved w/conditions
- 3.6 **121005/F** – Re-development of site, increase in size of car park, nursery shop. cafeteria, and general improvements – Approved w/conditions

4. Consultation Summary

Statutory Consultations

- 4.1 **Natural England** comments Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on designated sites and has no objection. Natural England's further advice on designated sites/landscapes and advice on other natural environment issues is set out below.

River Teme Site of Special Scientific Interest

Based on the plans submitted, Natural England considers that the proposed development will not damage or destroy the interest features for which the site has been notified and has no objection.

Local sites and priority habitats and species

We note that within the proposal site there are several priority habitats: traditional orchards, hedgerows and deciduous woodland. You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 171 and 174 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of principle importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006.

- 4.2 **Forestry Commission** comments *I have reviewed the application and confirm the Forestry Commission has no comments on it.*
- 4.3 **Welsh Water** comment:s We note from the application that the proposed development does not intend to connect to the public sewer network. As the sewerage undertaker we have no further

comments to make. However, we recommend that a drainage strategy for the site be appropriately conditioned, implemented in full and retained for the lifetime of the development.

Internal Council Consultations

- 4.4 The **Council's Transportation Manager** comments: It is noted that the number of lodges on the site has been reduced from 60 No. to 45 No. as part of this review of the scheme. This has been supported with an Addendum to the original transport statement which also seeks to address some of the queries posed in the original highways consultation response.

The first consultation response made a request for further details around the suitability of the junction of the C1054 and the A456 for catering for the demands of the development. The addendum sets out both the existing 'permitted' development movements and also considers the revised masterplan with the reduction in units (and as a result the reduction in traffic movements).

This clarification is acceptable to the local highway authority, taking into account the content of the NPPF paragraph 109, and as a result there are no highways objections to the proposal as amended.

As set out in the previous response it is recommended that the following conditions are applied in the event that permission is granted:

- CAB – Visibility Splays (2.4m x 59m)
- CAT – Construction Management Plan
- CB2 – Provision of Secure Cycle Parking

- 4.5 The **Transportation Manager's** original (now superseded) comments are as follows:

The existing use of the site is set out in the transport statement. This sets out the two way traffic flow on the C1054 of 414 per day on a 5 day average, reducing to 371 per day over a 7 day average. The 85th percentile speeds recorded in the survey are 34mph northbound and 35.1 mph southbound. These two way flows equate to peaks of between 40 and 60 per hour. It is noted that the site is located in relatively close proximity (c150m along a C class route) to the A class road network in the north of the county.

The traffic flow on the A456 as recorded is relatively light for an A class road, and combined with the light flows on the C1054 it is clear that whilst the proposed development will lead to an increase in trips generated by the site these will not lead to a capacity issue that could be classed as severe as set out in the NPPF (Para. 109). This is further evidenced when considering the potential trip generation as a result of the existing use of the site.

The collision status of the junction of the A456 and the C1054 has been requested from Herefordshire Council's Accident Investigation section. This has confirmed that there are no (0) personal injury collisions in the most recent 5 years and this site has not been treated as an accident cluster site since the formation of Herefordshire Council. However whilst the visibility from this junction is set out in images in the TA in figures 4.3 and 4.4 the dimensions are not shown. There is concern that the visibility to the east is restricted by the alignment of the A456 and whilst there may be sufficient visibility for a vehicle to emerge safely from the junction, the risk of shunts as a result of a turning vehicle into the lane is likely to be exacerbated, particularly if longer touring caravans are to visit the site. The TA should address this safety concern robustly in the form of an addendum to the TS. This is particularly relevant because the proposed development will increase the movements at the junction, therefore increasing the potential conflict points.

The proposed site access is to be amended to accommodate a 2.4m x 59m splay in each direction as set out on drawing 406.08139.00005.H010.0. The hedgerows should be set back sufficiently

to allow for seasonal growth to not obscure the visibility line and in order to ensure this is delivered condition CAB should be applied in the event permission is granted.

The TA sets out amendments to the access to accommodate the increased traffic flows for future users and the construction phase traffic. This includes mention of the requirement to manage the construction phase so in the event that a 'temporary' access is required this should be set out so that it can be considered for its acceptability. Linked to this point it is felt that the conditioning of the Construction Management Plan would be beneficial to build on the content of section 7.1 of the TA and ensure that acceptable measures are put in place to appropriately mitigate the impact on the highway network. This should consider a before survey undertaken in conjunction with Herefordshire Council's Service Provider, BBLP to ensure that any exceptional damage as a result of the lodge importation is subject to appropriate remedial work.

The provision of the travel plan in section 7.2 is appropriate for this stage of the development. However to ensure that the travel plan is both implemented and developed in accordance with the undertaking set out here, it is recommended that condition CAT is applied in the event permission is granted.

In terms of sustainable travel options to the site, it is recognised that these are likely to be limited to recreational travel around the rural roads in the vicinity of the development. Whilst this is not ideal, it is clear that given the current land use at the site this is considered acceptable. The provision of secure cycle parking should be encouraged to allow for guests wishing to access the site, or the local area via cycle to securely store their bicycles. In the event that permission is granted condition CB2 is applied.

It is noted that parking around the site is dispersed with the exception of small car parks near to the key buildings. This level of parking is considered adequate to prevent parking being displaced onto the adjacent highway network and is therefore acceptable.

All applicants are reminded that attaining planning consent does not constitute permission to work in the highway. Any applicant wishing to carry out works in the highway should see the various guidance on Herefordshire Council's website:

www.herefordshire.gov.uk/directory_record/1992/street_works_licence
<https://www.herefordshire.gov.uk/info/200196/roads/707/highways>

The proposed redevelopment of the existing Country Park development is broadly acceptable in highways terms, subject to updated detail around the suitability of the A456 J/W C1054 priority give way junction for accommodating the additional movements safely.

- 4.6 **Principal Natural Environment Officer (*Landscape*)** comments I have seen the amended drawings, LVIA addendum (including colour palette), sections and landscape management and maintenance plan.

The density of the development has been reduced from 60 to 45 and therefore offers additional area for landscape for mitigation and biodiversity enhancement. This has been addressed in the amended and additional information.

I am satisfied that many of the recommendations provided in previous landscape comments (i.e. colour, planting, impacts on the ground around the lodges has now been addressed.

A 10 year management and maintenance plan has been submitted fulfilling the requirements of the long term establishment and ongoing needs of the landscaping.

However, there is further detail to be provided in terms of hard and soft landscape and this can be conditioned. Although a management and maintenance plan has been provided, I ask for this

to be conditioned to ensure that it will be up to date with submitted drawings and written specifications.

Conditions

CK6 – Landscape Scheme

- a) A plan showing existing and proposed finished levels or contours.
- b) A drawing detailing hard surfacing materials with details.
- c) Boundary treatments and means of enclosure.
- d) Artefacts and Structures e.g. street furniture, play equipment, water features.
- e) Vehicle parking layouts
- f) Lighting and CCTV
- g) Trees and hedgerow to be removed.
- h) Trees and hedgerow to be retained, setting out measures for their protection during construction, in accordance with BS5837:2012.
- i) All proposed planting, accompanied by a written specification setting out species, size, quantity, density and cultivation details.
- j) A plan detailing the water attenuation schemes, with detailed sections of edge conditions.

CK7 – Implementation

CK5 – Maintenance Plan (10 years)

CK8 – Management Plan (10 years)

And to confirm the final colour schemes

C13 Samples of external materials

Reason: To safeguard and enhance the character and amenity of the area in order to conform with policies SS6, LD1 and LD3 of the Herefordshire Local Plan - Core Strategy and the National Planning Policy Framework

- 4.7 **Principal Natural Environment Officer (Ecology)** comments on amended plans: *It is noted that the number of lodges on the site has been reduced from 60 No. to 45 No. as part of this review of the scheme and the amended and additional information furthermore offers additional area for landscape, mitigation and biodiversity enhancement.*

Previously there were no objections raised by Natural England and my colleague in Ecology who made reference to Natural England's comments and recommendations were made for suitable Biodiversity Conditions to secure the relevant mitigation for the development.

This amended proposal includes provisions for low-level lighting throughout the scheme and the reduction in building size and density will further reduce lighting for the site. The final approved lighting design will be secured through a relevant Lighting condition. Furthermore amendments from the original proposals to reduce the duration of evening entertainment and reduction in site accommodation will improve noise volumes, reduce public use and therefore achieving less ecological disturbance and in particular disturbance to nocturnal species.

The revised proposal includes a detailed Landscape Masterplan and 10 year management and maintenance plan. My colleague Nigel Koch, Senior Landscape Officer provided detailed comments dated: 05/06/2020 in regards to the revised proposals, Ecology fully supports his recommendations and suggested planning conditions.

From an Ecological perspective the suggested planning conditions (also suggested by the applicant's revised proposals) include reference to:

- The Landscape Masterplan and 10 year management and maintenance plan;

- Construction Environmental Management Plan;
- Sustainable Drainage strategy;
- Lighting Scheme;
- Tree Protection;
- retention and integration of existing habitats, and;
- the implementation of biodiversity net gain such as wetland and terrestrial habitats bird and bat boxes as a minimum requirement. All biodiversity net gain proposed within the supplied ecological reports should be conditioned and supported by a final submitted Ecological Clerk of Works Statement, inclusive of biodiversity net gain photographs, details of long-term aftercare for the lifetime of the development.

It is noted that a foul and surface water drainage strategy has not been fully detailed at this point in time however the applicant has indicated a sustainable drainage option with attenuation ponds within the red line boundary. Designed according to the relevant SuDs guidance and drainage specifications on-site SuDs drainage can secure additional biodiversity net gain enhance habitat connectivity and amenity value, whilst also reducing risks to local environments or maintenance or technical failure of unsustainable drainage design.

Objections to the application also raised potential drainage issues as a significant concern, and I draw the Case offices attention to this. From the advice provided by Natural England and my Ecology colleague, Drainage conditions will secure the appropriate mitigation. Prior to the commencement of the development details of the proposed foul and surface water drainage arrangements shall be submitted to and approved in writing by the local planning authority. Therefore it is recommended that the applicant provides final details of foul and surface water strategies at the earliest opportunity to avoid any identification of legal constraints or planning restrictions further into the planning process.

Original comments stated as follows –

It is noted in their response dated 13th February 2020 that Natural England have not raised any objection to this application in relation to the nearby River Teme SSSI or any other nationally important or designated nature conservation site. Reviewing the supplied information there is no reason for this LPA to arrive at a different conclusion in this regard.

Looking at available information and the supplied ecology report and associated Habitat Enhancement and Biodiversity Net Gain plan appear relevant and appropriate.

Given the extensive nature of the works proposed and the proximity to watercourses directly linking to the Teme SSSI, Priority Habitats (retained) on the site, potential presence of opportunistic/transitory species and possible effects of the wider landscaping and site ground works, use of machinery, material storage and similar it is appropriate and relevant that this LPA requires a detailed and comprehensive Construction Environmental Management Plan as a pre-commencement condition. This CEMP should clear identify the 'responsible persons'.

Nature Conservation Protection

Before any work, including any site clearance or demolition begins, equipment or materials moved on to site, a fully detailed Construction Environmental Management Plan (CEMP) and named 'responsible persons' shall be supplied to the local planning authority for written approval. The approved CEMP shall be implemented and remain in place until all work is completed on site and all equipment and spare materials have finally been removed.

Reason: In order to comply with Conservation of Habitats and Species Regulations (2017), National Planning Policy Framework, NERC Act (2006), NPPF (2019) and Herefordshire Council Core Strategy (2015) policy SS6, LD2 and LD3

The Ecological Enhancement and Mitigation Strategy by RPS Group dated December 2019 should be secured through a relevant condition on any consent granted.

Nature Conservation – Mitigation and Biodiversity Net Gain

The Ecological Enhancement and Mitigation Strategy, by the RPS Group dated December 2019 shall be implemented and hereafter maintained in full as stated unless otherwise approved in writing by the local planning authority.

Reason: To ensure that all species are protected and habitats enhanced having regard to the Wildlife and Countryside Act 1981 (as amended), the Habitats & Species Regulations 2017 (as amended), Policy LD2 of the Herefordshire Core Strategy, National Planning Policy Framework (2019) and NERC Act 2006

- 4.8 **Environmental Health Service Manager (Noise / Nuisance)** comments: Our department has been reconsulted with regard to this proposal. I have reviewed the information supplied with regard to noise and nuisance and advise that I have a couple of further comments to make. This it to recommend the following conditions:

The Noise Management Plan supplied with the application shall be subject to a documented review on at least a yearly basis and a copy supplied to the local authority on request.

The use of fireworks and Chinese lanterns shall not permitted on this site.

Reasons: In order to protect the amenity of occupiers of nearby properties so as to comply with Policies SS6 and SD1 of the Herefordshire Local Plan Core Strategy.

Original comments stated *from a noise and nuisance perspective our department has no objections to this proposal*. The applicant has supplied a noise management plan as part of this application and we are of the opinion that this covers the essentials for noise control and minimisation of noise nuisance to neighbours.

We recommend a condition to limit the hours of demolition and construction on site:

During the demolition and construction phases no machinery shall be operated, no process shall be carried out and no deliveries taken at or despatched from the site outside the hours of 0800 to 1800 Mondays to Fridays and 0800 to 1300 on Saturdays. There shall be no such working on Sundays, Bank or Public Holidays.

Reason: In order to protect the amenity of occupiers of nearby properties so as to comply with Policies SS6 and SD1 of the Herefordshire Local Plan Core Strategy 2011-31

- 4.9 **Environmental Health Service Manager (Contaminated Land)** comments: I refer to the above application and would make the following comments in relation to contaminated land and human health issues.

"Bleathwood Lodges. Phase 1 Environmental Site Assessment." Prepared by SLR Consulting, ref:406.08139.00005.003, Version 1.0, Dated: December 2019.

The report concludes by saying that the "Site is considered to pose no unacceptable environmental risks..." and "...no further action is necessary."

On this basis I'd recommend the following condition which covers the unforeseen be appended to any approval on a precautionary basis.

Recommended condition: *"If during the course of the development unexpected contamination not previously identified is found to be present at the site then the work shall be stopped and no further development shall be carried out unless or until the developer has submitted a written method statement to be approved in writing by the local planning authority. The method statement shall include details about how the unexpected contamination shall be dealt with. Thereafter the development of the site will be carried out in accordance with the appropriate method statement.*

Reason: *In the interests of human health."*

4.10 Public Rights of Way Manager Comments on amended plans as follows –

Previous comments stand. Noted that the PROW will be accommodated and that hedge growth has been allowed for. No objection.

Previous comments stated *Public footpath LH15 crosses the site. Plans suggest that the additional hedges are to be planted to enclose the path. If this is the case the path must be given a full width of 2m and hedges must be well maintained to ensure that they do not grow and reduce this width.*

4.11 The Land Drainage Engineer comments: We note that applicant is proposing a private foul pumping station and rising main using directional drilling. There are also proposals for a new sewer in the highway (at the connection point) that will be adopted by Severn Trent.

The surface water drainage calculations demonstrate that the surface water strategy is acceptable. We note that the cover level for the southern pond is shown as 67.70m, although local ground levels are approx. 67.03m. It should be possible to raise the ground locally, we note that the access road would also need to be raised up.

We hold no objections to the development and suggest that further information is requested as per the following conditions –

- A detailed design for the surface water drain below Bleathwood Lane shall be submitted. If a private drain is proposed then a NRSWA Section 50 notice shall be submitted
- A drawing showing proposed ground levels in the vicinity of the southern pond shall be issued, identifying the level of the proposed adjacent site road
- The foul pumping station shall be provided with a minimum of 24 hours storage above the high level pump start level (or more storage if a repair cannot be facilitated within the 24 hour time frame). The pumping station shall meet Type 1 design standards. An Operation and Maintenance plan shall be presented identifying a competent contractor that can repair the pumps within the specified time frame
- If existing tanks are to be re-used, hydraulic test results shall be presented to demonstrate the adequacy of on-line storage facilities for the storing sewage
- A NRSWA Section 50 will need to be submitted for the foul rising main

5. Representations

5.1 Bleathwood and Little Hereford Parish Council comments *The Parish Council reiterate their previous comments and still strongly object to this application, it does not adhere to policy BLH18 of the neighbourhood plan.*

The proposal is still disproportionate to the surroundings of the local rural area with 45 lodges proposed and will have an adverse affect on the surrounding infrastructure especially local road networks. The C1054 road leading from the A456 junction is in a bad state of repair, adding extra traffic onto this road would exacerbate the problem. Despite comments by Highways, the A456/C1054 junction is currently named an accident cluster site by Balfour Beatty in their weekly bulletin when work in that area is being done and is it regularly inspected. Although this may not be considered a permanent development, the effects will be the same, the amount of extra traffic

generated, even with just one car allowed per lodge, will be worse than at present. There are no pavements and a car is needed due to its rural location. It is also proposed that all existing buildings bar one are to be demolished, policy BLH18 states that existing buildings should be re-used.

The applicant has not answered the concerns of the Drainage Engineer regarding the sewage system, we seek assurance that a sustainable drainage system to deal with foul water is submitted and not left as a condition of planning. We remain concerned regarding high levels of phosphates in the River Teme and for the Ledwyche Brook just over the border into Shropshire, any further surface water generated by extra hardstanding or an unsustainable drainage system would cause the A456 to become hazardous in bad weather at a spot where water regularly settles.

There are two caravan parks in Little Hereford and many similar businesses within a few miles of this location, along with various local B&B's and guest houses, the site is acceptable as a small rural business and should remain as it is. In addition there would be light and noise pollution for surrounding properties. It is for these reasons that this application should be rejected to avoid the immense ecological impact upon the rural area that this would have, and which should be respected.

Due to strong local feeling and the concerns mentioned above, we request this application be decided at a planning committee meeting.

Previous comments can be read at:

<https://myaccount.herefordshire.gov.uk/documents?id=1781a10d-4691-11ea-a15c-0050569f00ad>

5.2 **83 letters of objection** have been received, comments are summarised as –

- Density and scale of development is inappropriate
- Concern regarding light pollution
- Concern regarding noise pollution
- Concern regarding potential increased traffic on Bleathwood Lane
- No public transport serves the area
- Concern lodges would be sold of and used as dwellings
- Question the need for the development with reference to similar sites near Tenbury
- Adverse impact on biodiversity and habitats
- Number of lodges is excessive
- Carbon footprint of development
- Concern regarding highway safety
- There will be little benefit to the local economy
- Concern regarding drainage
- Impact on amenity
- Landscape impact
- Concern regarding phosphates and the River Teme SSSI

5.3 **119 letters of support** have been received, comments are summarised as –

- Proposal would be a boost to the local economy
- Employment opportunities and job creation
- Proposal suits its surroundings
- Will enable opportunity for people to enjoy the countryside, especially those from outside the county and cities
- Appears to be a co ordinated campaign against the proposals which is personal
- Proposal has an eco friendly approach
- Proposal is an upgrading and improvement of existing facilities
- Minimal disruption will result from the proposals
- The proposal would be an asset to the area and county
- Lodges in a landscaped setting is an improvement over caravans and tents

- Will promote UK tourism and holiday spend
- Access is from an A road so can accommodate traffic
- Existing issues in Bleathwood Lane do not arise from the site or will be increased by the proposal. Existing local traffic is the issue
- Proposal would end caravan movements to and from the site

5.4 **Herefordshire Ramblers Association** comments *This development clearly will affect existing footpath LH15, which runs through the middle of the site.* Provided this public right of way is kept open to foot traffic prior to, during and following the completion of the development, and any hedging boundary enables a full 2 metres width of path, we have no objection to the proposal. It is essential that a regular maintenance plan is put in place by the land owner and/or site manager to ensure that the hedging does not encroach significantly onto the path and impede passage. Suitable pedestrian gates should be installed at the ingress and exit of the footpath from the site.

5.5 The consultation responses can be viewed on the Council's website by using the following link:-

https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=194418&search-term=194418

Internet access is available at the Council's Customer Service Centres:-

<https://www.herefordshire.gov.uk/government-citizens-and-rights/customer-services-enquiries/contact-details?q=customer&type=suggestedpage>

6. Officer's Appraisal

Policy context and Principle of Development

6.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states as follows "*If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.*" The development plan is the Herefordshire Core Strategy and Brimfield and Little Hereford Group Neighbourhood Development Plan.

6.2 With regards to heritage, Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states "*In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*"

Herefordshire Local Plan - Core Strategy

6.3 Core Strategy Policy SS4 – Movement and transportation states New developments should be designed and located to minimise the impacts on the transport network; ensuring that journey times and the efficient and safe operation of the network are not detrimentally impacted. Furthermore, where practicable, development proposals should be accessible by and facilitate a genuine choice of modes of travel including walking, cycling and public transport.

6.4 The policy sets out development proposals that will generate high journey numbers should be in sustainable locations, accessible by means other than private car. Alternatively, such developments will be required to demonstrate that they can be made sustainable by reducing unsustainable transport patterns and promoting travel by walking, cycling and public transport. Proposals to provide new and improved existing public transport, walking and cycling infrastructure will be supported. Where appropriate, land and routes will be safeguarded as required in future local or neighbourhood development plans and developer contributions, which meet the statutory tests, sought to assist with the delivery of new sustainable transport infrastructure, including that required for alternative energy cars.

- 6.5 Policy SS5 – *Employment provision* states: existing higher quality employment land countywide will be safeguarded from alternative uses...The continuing development of the more traditional employment sectors will be supported.
- 6.6 Core Strategy policy SS6 describes proposals *should conserve and enhance those environmental assets that contribute towards the county's distinctiveness, in particular its settlement pattern, landscape, biodiversity and heritage assets and especially those with specific environmental designations.*
- 6.7 Policy SS6 then states in its list of criteria states *Development proposals should be shaped through an integrated approach and based upon sufficient information to determine the effect upon landscape, townscape and local distinctiveness, especially in Areas of Outstanding Natural Beauty.*
- 6.8 Core Strategy Policy SS7 – *Addressing climate change* states Development proposals will be required to include measures which will mitigate their impact on climate change. At a strategic level, this will include:
- focussing development to the most sustainable locations;
 - delivering development that seeks to reduce the need to travel by private car and which encourages sustainable travel options including walking, cycling and public transport;
 - designing developments to reduce carbon emissions and use resources more efficiently;
 - promoting the use of decentralised and renewable or low carbon energy where appropriate;
 - supporting affordable, local food production, processing and farming to reduce the county's contribution to food miles*;
 - protecting the best agricultural land where possible
- 6.9 Key considerations in terms of responses to climate change include:
- taking into account the known physical and environmental constraints when identifying locations for development;
 - ensuring design approaches are resilient to climate change impacts, including the use of passive solar design for heating and cooling and tree planting for shading;
 - minimising the risk of flooding and making use of sustainable drainage methods;
 - reducing heat island effects (for example through the provision of open space and water, planting and green roofs);
 - reduction, re-use and recycling of waste with particular emphasis on waste minimisation on development sites; and
 - developments must demonstrate water efficiency measures to reduce demand on water resources.
- 6.10 Policy E1 – *Employment provision* states; The focus for new employment provision in Herefordshire is to provide a range of locations, types and sizes of employment buildings, land and offices to meet the needs of the local economy. Larger employment proposals will be directed to the strategic employment sites of Hereford, the market towns and rural industrial estates where appropriate. Development proposals which enhance employment provision and help diversify the economy of Herefordshire will be encouraged where:
- the proposal is appropriate in terms of its connectivity, scale, design and size;
 - the proposal makes better use of previously developed land or buildings;
 - the proposal is an appropriate extension to strengthen or diversify an existing business operation;
 - the proposal provides for opportunities for new office development in appropriate locations.
- 6.11 Policy E2 – *Redevelopment of existing employment land and buildings* looks to safeguard important or valued employment land and buildings.

- 6.12 Policy E4 – *Tourism* states Herefordshire will be promoted as a destination for quality leisure visits and sustainable tourism by utilising, conserving and enhancing the county's unique environmental and heritage assets and by recognising the intrinsic character and beauty of the countryside. In particular, the tourist industry will be supported by a number of measures including as relevant to this proposal from six listed criteria –
- the development of sustainable tourism opportunities, capitalising on assets such as the county's landscape, rivers, other waterways and attractive rural settlements, where there is no detrimental impact on the county's varied natural and heritage assets or on the overall character and quality of the environment. Particular regard will be had to conserving the landscape and scenic beauty in the Areas of Outstanding Natural Beauty
 - retaining and enhancing existing, and encouraging new, accommodation and attractions throughout the county, which will help to diversify the tourist provision, extend the tourist season and increase the number of visitors staying overnight
 - ensuring that cycling, walking and heritage tourism is encouraged by facilitating the development of long distance walking and cycling routes, food and drink trails and heritage trails, including improvements to public rights of way, whilst having special regard for the visual amenity of such routes and trails, and for the setting of heritage assets in their vicinity.
- 6.13 Core Strategy Policy RA6 – *Rural economy* emphasizes this sector will be strengthened by providing flexibility for new and expanding rural businesses and sets out a range of criteria that will need to be met to ensure that resulting developments are of an appropriate scale and location and do not significantly impact upon the environmental quality of the area. CS Policy RA6 also acknowledges Tourism plays a role within the rural economy. The varied tourism facilities enable existing farms and rural businesses to diversify as well as accommodating the needs of visitors. With a nod to the rural nature of much of the county, the policy also states *isolated employment sites may be appropriate for small extensions and/or redevelopment*, however will need to take into account other relevant policies within this plan. The policy states A range of economic activities will be supported, including proposals which:
- support and/or protect the vitality and viability of commercial facilities of an appropriate type and scale in rural areas, such as village shops, petrol filling stations, garden centres and public houses;
 - involve the small scale extension of existing businesses;
 - promote sustainable tourism proposals of an appropriate scale in accordance with Policy E4 - Tourism;
 - promote the sustainable use of the natural and historic environment as an asset which is valued, conserved and enhanced.
- 6.14 Planning applications which are submitted in order to diversify the rural economy will be permitted where they ensure that the development is of a scale which would be commensurate with its location and setting; do not cause unacceptable adverse impacts to the amenity of nearby residents by virtue of design and mass, noise and dust, lighting and smell; do not generate traffic movements that cannot safely be accommodated within the local road network and do not undermine the achievement of water quality targets in accordance with Policies SD3 and SD4.
- 6.15 Core Strategy Policy MT1 – *Traffic management, highway safety and promoting active travel* states Development proposals should incorporate the following principle requirements covering movement and transportation:
1. demonstrate that the strategic and local highway network can absorb the traffic impacts of the development without adversely affecting the safe and efficient flow of traffic on the network or that traffic impacts can be managed to acceptable levels to reduce and mitigate any adverse impacts from the development;

2. promote and, where possible, incorporate integrated transport connections and supporting infrastructure (depending on the nature and location of the site), including access to services by means other than private motorised transport;
 3. encourage active travel behaviour to reduce numbers of short distance car journeys through the use of travel plans and other promotional and awareness raising activities;
 4. ensure that developments are designed and laid out to achieve safe entrance and exit, have appropriate operational and manoeuvring space, accommodate provision for all modes of transport, the needs of people with disabilities and provide safe access for the emergency services;
 5. protect existing local and long distance footways, cycleways and bridleways unless an alternative route of at least equal utility value can be used, and facilitate improvements to existing or provide new connections to these routes, especially where such schemes have been identified in the Local Transport Plan and/or Infrastructure Delivery Plan; and
 6. have regard to with both the council's Highways Development Design Guide and cycle and vehicle parking standards as prescribed in the Local Transport Plan - having regard to the location of the site and need to promote sustainable travel choices.
- 6.16 Where traffic management measures are introduced they should be designed in a way which respects the character of the surrounding area including its landscape character. Where appropriate, the principle of shared spaces will be encouraged.
- 6.17 Core Strategy policy LD1 – *Landscape and townscape* criteria requires new development must achieve the following:
- demonstrate that character of the landscape and townscape has positively influenced the design, scale, nature and site selection, including protection and enhancement of the setting of settlements and designated areas;
 - conserve and enhance the natural, historic and scenic beauty of important landscapes and features, including Areas of Outstanding Natural Beauty, through the protection of the area's character and by enabling appropriate uses, design and management
- 6.18 Core Strategy Policy LD2 – *Biodiversity and geodiversity* states Development proposals should conserve, restore and enhance the biodiversity and geodiversity assets of Herefordshire, through the:
1. retention and protection of nature conservation sites and habitats, and important species in accordance with their status as follows:
 - a) Development that is likely to harm sites and species of European Importance will not be permitted;
 - b) Development that would be liable to harm Sites of Special Scientific Interest or nationally protected species will only be permitted if the conservation status of their habitat or important physical features can be protected by conditions or other material considerations are sufficient to outweigh nature conservation considerations
 - c) Development that would be liable to harm the nature conservation value of a site or species of local nature conservation interest will only be permitted if the importance of the development outweighs the local value of the site, habitat or physical feature that supports important species.
 - d) Development that will potentially reduce the coherence and effectiveness of the ecological network of sites will only be permitted where adequate compensatory measures are brought forward.
 2. restoration and enhancement of existing biodiversity and geodiversity features on site and connectivity to wider ecological networks; and
 3. creation of new biodiversity features and wildlife habitats.

6.19 Core Strategy policy LD4 – *Historic environment and heritage assets* sets out as relevant to this appeal that Development proposals affecting heritage assets and the wider historic environment should:

1. *Protect, conserve, and where possible enhance heritage assets and their settings in a manner appropriate to their significance through appropriate management, uses and sympathetic design, in particular emphasising the original form and function where possible*
2. *the conservation and enhancement of heritage assets and their settings through appropriate management, uses and sympathetic design. Where opportunities exist, contribute to the character and local distinctiveness of the townscape or wider environment, especially within conservation areas.*

6.20 Core Strategy Policy SD3 – *Sustainable water management and water resources* states Measures for sustainable water management will be required to be an integral element of new development in order to reduce flood risk; to avoid an adverse impact on water quantity; to protect and enhance groundwater resources and to provide opportunities to enhance biodiversity, health and recreation. This will be achieved by ensuring that:

1. *Development proposals are located in accordance with the Sequential Test and Exception Tests (where appropriate) and have regard to the SFRA 2009 for Herefordshire;*
2. *Development is designed to be safe, taking into account the lifetime of the development and the need to adapt to climate change by setting appropriate floor levels, providing safe pedestrian and vehicular access, where appropriate, implementing a flood evacuation management plan and avoiding areas identified as being subject to rapid inundation from a breach of a Flood Defence;*
3. *Where flooding is identified to be an issue, new development should reduce flood risk through the inclusion of flood storage compensation measures, or provide similar betterment to enhance the local flood risk regime;*
4. *Development will not result in the loss of open watercourses and culverts should be opened up where possible to improve drainage and flood flows. Proposals involving the creation of new culverts (unless essential to the provision of access) will not be permitted;*
5. *Development includes appropriate sustainable drainage systems (SuDS) to manage surface water appropriate to the hydrological setting of the site. Development should not result in an increase in run-off and should aim to achieve a reducing in the existing run-off rate and volumes where possible;*
6. *Water conservation and efficiency measures are included in all new developments, specifically:*
 - *Residential development should achieve Housing – Optional Technical Standards – Water efficiency measures. At the time of adoption the published water efficiency standards were 110 litres/person/day; or*
 - *Non-residential developments in excess of 1,000 m² gross floorspace to achieve the equivalent of BREEAM 3 credits for water consumption as a minimum;*
7. *The separation of foul and surface water on new developments is maximised;*
8. *Development proposals do not lead to deterioration of EU Water Framework Directive water body status;*
9. *Development should not cause an unacceptable risk to the availability or quality of water resources; and*

10. *In particular, proposals do not adversely affect water quality, either directly through unacceptable pollution of surface water or groundwater, or indirectly through overloading of Wastewater Treatment Works.*

- 6.21 Development proposals should help to conserve and enhance watercourses and riverside habitats, where necessary through management and mitigation measures for the improvement and/or enhancement of water quality and habitat of the aquatic environment. Proposals which are specifically aimed at the sustainable management of the water environment will in particular be encouraged, including where they are required to support business needs such as for agriculture. Innovative measures such as water harvesting, winter water storage and active land use management will also be supported. In all instances it should be demonstrated that there will be no significant adverse landscape, biodiversity or visual impact.”
- 6.22 Core Strategy Policy SD4 – *Wastewater treatment and river water quality* states Development should not undermine the achievement of water quality targets for rivers within the county, in particular through the treatment of wastewater.
- 6.23 In the first instance developments should seek to connect to the existing mains wastewater infrastructure network. Where this option would result in nutrient levels exceeding conservation objectives targets, in particular additional phosphate loading within a SAC designated river, then proposals will need to fully mitigate the adverse effects of wastewater discharges into rivers caused by the development. This may involve:
- incorporating measures to achieve water efficiency and/or a reduction in surface water discharge to the mains sewer network, minimising the capacity required to accommodate the proposal, in accordance with policy SD3;
 - phasing or delaying development until further capacity is available;
 - the use of developer contributions/community infrastructure levy funds to contribute to improvements to waste water treatment works or other appropriate measures to release capacity to accommodate new development;
 - in the case of development which might lead to nutrient levels exceeding the limits for the target conservation objectives within a SAC river, planning permission will only be granted where it can be demonstrated that there will be no adverse effect on the integrity of the SAC in view of the site’s conservation objectives; and
 - where the nutrient levels set for conservation objectives are already exceeded, new development should not compromise the ability to reduce levels to those which are defined as favourable for the site.

Neighbourhood Plan

- 6.24 The Brimfield and Little Hereford Neighbourhood Development Plan was made on 22 July 2016 and now forms part of the Development Plan.
- 6.25 The site is not within any defined settlement boundary within the NDP and as such is in a countryside location.
- 6.26 NDP policies which are relevant to the application are –
- 6.27 BLH8 – *Building Design Principles* which sets out new development must enhance and reinforce local distinctiveness and show how character, scale, mass and layout fits with the ‘grain’ of the surrounding area through a Design and Access Statement or similar. The policy directs new development to be of a scale, mass and form which responds to the characteristics of the site and its surroundings. Protection of visual amenities and impact on wider landscape views are prioritised within the policy and the impact on amenity should be minimised along with careful consideration to noise, odour and light. New buildings are required to follow a consistent design

approach in the use of materials and fenestration which should complement and add to the quality or character of the area.

- 6.28 BLH9 – *Landscape Design Principles* requires development must preserve or enhance the character of the area and local habitats and wildlife and protect mature and established trees. New locally relevant species planting is promoted and encouraged. All development must incorporate SuDS which are compliant with the most current standards.
- 6.29 BLH12 – *Water Management* requires new development to incorporate suitable sustainable drainage measures and where there are known surface water issues, appropriate mitigation and construction measures required.
- 6.30 BLH16 – *Design to Reduce Surface Water Runoff* requires the maximisation of surface water being retained on site with run off minimised with attenuation measures such as ponds provided within development sites where possible.
- 6.31 BLH18 – *Development Supporting Rural Enterprise* supports small scale development where it does not have a detrimental effect on the character of the landscape or adversely affect local infrastructure with particular regard to the local road network and local flooding problems. Proposals should also benefit the local community through employment opportunities, service provision and where feasible involves the re use of existing buildings or is part of a farm diversification scheme.

National Planning Policy Framework

- 6.32 The NPPF has 'sustainable development' central to planning's remit and objectives. The NPPF also seeks positive improvements in the quality of the built, natural and historic environment and in regards people's quality of life. The National Planning Policy Framework has been considered in the assessment of this application. The following sections are considered particularly relevant:
- 2. Achieving sustainable development
 - 6. Building a strong, competitive economy
 - 8. Promoting healthy, safe communities
 - 11. Making effective use of land
 - 12. Achieving well-designed places
 - 15. Conserving and enhancing the natural environment
 - 16. Conserving and enhancing the historic environment
- 6.33 Paragraph 7 and 8 sets out and defines sustainable development and of the three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways, the social objective requires planning to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.
- 6.34 Paragraph 11 of the Framework sets out the presumption in favour of sustainable development. For decision-taking this means where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless the application of policies of the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 6.35 Chapter 8 of the NPPF sets out how a strong, complete economy will be delivered and assisted through the planning process. Paragraph 80 requires Planning policies and decisions should help

create the conditions in which businesses can invest, expand and adapt. 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. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.

6.36 The rural economy and support of it is given specific coverage under paragraph 83 and 84, where it states Planning policies and decisions should enable:

- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;
- b) the development and diversification of agricultural and other land-based rural businesses;
- c) sustainable rural tourism and leisure developments which respect the character of the countryside;
- d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

6.37 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. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.

6.38 With particular reference to the matter of access, the NPPF sets out how transportation, highways impact and non-vehicular movement should be considered, assessed and supported in paragraphs 108 – 111, stating: *In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users; and
- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

Paragraph 109 explicitly states *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.*

6.39 NPPF Paragraph 124 states *The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. 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.*

6.40 Paragraph 127 outlines Planning decisions should ensure that developments:

- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

- are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

6.41 NPPF paragraph 180 states Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life.

6.42 NPPF section 16 sets out the position regarding conserving and enhancing the historic environment. Specific principles and policies relating to the historic environment and heritage assets and development are found in paragraphs 184 – 202.

Assessment

Principle of Development

6.43 The Core Strategy does not allocate land directly for tourism use, nor does the Neighbourhood Development Plan incorporate such allocations. Instead, the CS proposed broad strategic directions for growth in sustainable locations.

6.44 In accordance with the NPPF and Policy SS1 a *positive approach* must be taken by Herefordshire Council to reflect the presumption in favour of sustainable development. Furthermore the LPA through policy SS1 will be proactive wherever possible and to secure development that improves the social, economic and environmental conditions in Herefordshire.

6.45 The principle of development has been established by the site's alignment with the Core Strategy under policy RA6 and E4 as the site is already in an economic use with elements of those uses being tourism based.

6.46 The site has evolved over time and benefits from planning permission allowing the site to be used for 60 touring caravan pitches, 100 tent pitches, 6 static caravan pitches and 8 glamping pods all of which can be used all year round. The site also has café/ restaurant and boxing gym/ fitness centre and disused garden nursery buildings. As such there is a significant quantum of permitted lawful commercial use on the site, however in an uncoordinated manner with limited planning controls. The permitted uses on the site are a material consideration when assessing the proposals.

6.47 On that basis and having regard to the development proposed (which would supersede and extinguish those existing permitted lawful tourism and economic uses), that the proposal accords with the development plan means that by statute and by Section 38(6), there is a presumption in favour of approval (because there is a presumption in favour of the development plan) and having regard to paragraph 11; footnote 6, there are no restrictive policies that are applicable in this

instance. As such the acceptability of the proposals is based on the assessment of both material and technical considerations. These matters are considered in the Report below.

- 6.48 As such, in accordance with Local and National Planning policy approval should be given unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

Sustainability and addressing Climate Change

- 6.49 Policy SS7 is a strategic policy requiring focus on measures to address climate change. Reducing carbon footprint and CO2 emissions has been at the forefront of recent political and media discourse, receiving rightful prominent coverage. Herefordshire Council's Core Strategy has been 'ahead of the curve' in that regard with Policy SS7 in place and a requirement to be satisfied by development since October 2015. Policy SD1 also seeks to secure this.
- 6.50 Sustainable tourism is promoted and supported by the Core Strategy with opportunities capitalising on assets such as the county's landscape, rivers, other waterways and attractive rural settlements supported where there is no detrimental impact on the county's varied natural and heritage assets or on the overall character and quality of the environment. The retention and enhancing of existing, and encouraging new accommodation and attractions throughout the county, which will help to diversify the tourist provision, extend the tourist season and increase the number of visitors staying overnight is supported under policy E4.
- 6.51 Government advice within the NPPF promotes within rural areas sustainable rural tourism and leisure developments which respect the character of the countryside. The NPPF requires decisions to 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. In these circumstances it notes it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land is encouraged over greenfield development where suitable opportunities exist.
- 6.52 The proposed built structures, i.e. the Meet and Greet Building and the Maintenance Building, adopt a simple design, representing a contemporary version of a single story agricultural barn reflective of the site's rural context. The Meet and Greet building will use air source heat pumps to generate low temperature hot water for underfloor heating. The building will be insulated above levels required under building regulations and an air pressure test will be carried out prior to completion to ensure that the building is sealed to prevent unwanted air leakage. Both buildings will be naturally ventilated by means of opening windows. The shallow depth of the Meet and Greet building means that during the day it can be naturally lit throughout, and the artificial lighting system will have daylight control sensors that will automatically adjust to suit the natural lighting levels. All lighting within any 'internal rooms' (such as stores etc.) will be linked to Passive Infra Red (PIR) movement control.
- 6.53 It is proposed that the Maintenance Building will include Photovoltaic Panels on the southerly roof pitch, linked back into the mains. Due to the function of this building the doors tend to be open regularly. Heating is therefore to be via radiant panels, which heat the individuals working within the space rather than the air. The building is to be naturally ventilated and will incorporate roof lights to allow natural light into the deep plan spaces. All rainwater run-off will be direct to soakaways, as outlined in the Drainage Report.
- 6.54 Other sustainable build details and energy efficiency measures to be used are –
- Opening windows to provide natural ventilation to avoid need for air conditioning
 - Highly insulated external walls, 150mm thick rockwool between external framing system and 50mm dense phenolic foam board to outer face of weather defence board to achieve a 'U' value below that required by Building Regulations

- Buildings lined, taped and sealed to prevent unwanted convection heat loss
- Low temperature hot water underfloor heating set within screed
- Hot water provided via Air Source Heat Pumps
- Air Source Heat Pumps located within an external enclosed compound

- 6.55 The holiday lodges are not permanent buildings, but are capable of being moved from one place to another, and therefore fall within the definition of caravans under the 'Caravan Sites and Control of Development Act 1960.' Although falling under the technical description of 'caravans', the applicant treat the design of their lodges with just as much importance as the permanent structures, both internally and externally. Each of the lodges will be designed specifically for the site, rather than standard 'off the shelf' models.
- 6.56 Further to the above and as detailed within the Landscape and Ecology sections of this report, there will be significant enhancements and gains to the character and appearance of the locality, biodiversity value and establishment of habitats.
- 6.57 The Core Strategy notes both the importance of tourism to the economy and its support to local services and facilities and furthermore accepts the location of much tourism activities and accommodation will be within rural locations to enjoy the landscape, scenic beauty and recreational opportunities such a location enables. The site is located short distance off the A465, an important 60 km long East West route linking across the county linking from the A49 at Wooferton to the East (and providing connectivity from the Hereford/ S. Wales/ Shrewsbury/ Mid Wales corridor) to Central Birmingham and Kidderminster at the West. The reality is Herefordshire has four train stations (Hereford, Leominster, Ledbury and Colwall) and a limited public transport service. Whilst most visitors are likely to arrive by private vehicle these trips would be made using major roads and routes.
- 6.58 Officers are also mindful of potential environmental benefits of British residents holidaying within the UK as opposed to flying to continental Europe or further on account of COVID19, uncertainty over post Brexit travel and people being more conscious to avoid unnecessary flights and personal CO2 emissions. The 'staycation' and non overseas holiday market is likely to increase and expand and it is noted Herefordshire actively wants to increase its offer, profile, quality of stay and ultimately increase the visitor numbers, draw and expenditure within the county and especially overnight stays. The economic assessment is considered further in the report below however it is noted many of the letters of support raise both the local economic benefits of the proposal along with referencing a desire to visit and explore Herefordshire's countryside for leisure and recreation purposes.
- 6.59 On assessment of the proposals both in terms of their built form and land uses, having regard to extant lawful uses and scrutiny of Core Strategy policies which actively seek to increase tourism to the county and considering both the location and reality of public transport options across the county the proposal is considered to, in principle, represent sustainable development and as such CS policy SS7 and SD1 are satisfied.

Economic Development

- 6.60 By encouraging more overnight stays and associated increased expenditure, there is potential for revenue from tourism to make a greater contribution to the county's economic well-being. The provision of new accommodation and the enhancement of existing accommodation will help achieve this goal. Many visitors to the county come to enjoy the beautiful countryside and there is likely to be a demand for new facilities and accommodations associated with this. Whilst small scale tourism associated development may be appropriate in rural areas it should maximise sustainable transport opportunities and to protect environmental amenity.
- 6.61 Tourism was at the start of the Plan period calculated to be worth £469m to the county's local economy with Over 4.7 million visitors to the county per year. These are and were mainly for short

stays to take advantage of the outstanding countryside, rich heritage and cultural offer. This sector in 2011 supported 8,480 jobs. "Visit Herefordshire" is the agency in the county that promotes tourism and alongside the council works to develop it as a visitor destination. The combination of Brexit, and British enforced holidays due to COVID19 offer opportunities for the growth of the tourism sector.

- 6.62 The delivery of high quality tourist, cultural and leisure development is supported in the county where it capitalises on existing assets, develops sustainable walking, cycling or heritage routes, benefits local communities and the economy and is sensitive to Herefordshire's natural and built environmental qualities and heritage assets.
- 6.63 These proposal will help to satisfy demand for UK based tourism which is likely to become the preferred holiday choice for many for the foreseeable future once lockdown is lifted and during the Covid era. This form of accommodation also offers opportunities for people to holiday while maintaining social distancing and is therefore likely to make an important contribution to attracting tourists to the County. The economic stimulus and employment which this will consequently create will be essential in helping to return some normality to everyone's lives.
- 6.64 Core Strategy Policy E4 recognises the contribution that tourism makes to the Herefordshire economy and seeks to ensure that this continues and is enhanced through new developments which are of an appropriate scale, type and location. Policy RA6 emphasises the rural economy will be strengthened by providing flexibility for new and expanding rural businesses and sets out a range of criteria that will need to be met to ensure that resulting developments are of an appropriate scale and location and do not significantly impact upon the environmental quality of the area. CS Policy RA6 also acknowledges Tourism plays a role within the rural economy. The varied tourism facilities enable existing farms and rural businesses to diversify as well as accommodating the needs of visitors. With a nod to the rural nature of much of the county, the policy also states *Isolated employment sites may be appropriate for small extensions and/or redevelopment*, however will need to take into account other relevant policies within this plan.
- 6.65 The site already benefits from planning permission allowing the site to be used for 60 touring caravan pitches, 100 tent pitches, 6 static caravan pitches and 8 glamping pods all of which can be used all year round. The site also has café/ restaurant and boxing gym/ fitness centre and disused garden nursery buildings. As such there is a significant quantum of permitted lawful economic use on the site, however in an uncoordinated manner with limited planning controls.
- 6.66 It is anticipated the proposals will employ around 20 members of staff in permanent, year-round roles. At present there are only 2 staff members, employed seasonally. It is the applicants' preference to employ locally, which is common within the sector, and to invest and train staff from junior to senior positions. The redevelopment of the site represents a capital investment of around £7 million into Herefordshire.
- 6.67 The average total spend in the local economy per visitor trip for off-park spending is predicted to be approximately £467 for lodge. From the applicants ten year experience of owning and running similar sites, visitor trips and rental units will be more beneficial for the local economy when compared with existing on site tourism model, which is characterised by visitors who generally bring provisions with them. Visitors will be attracted to the proposal which offers high quality, luxury lodges suitable for year-round use, attracting customers who are likely to spend more money within the local economy.
- 6.68 Total Anticipated Revenue Generated in Local Economy Per Annum is £866,021.37 compared with the current £90,377 Based on 70% average annual occupancy rate for new Lodge Park and 50% occupancy for existing tenting and touring park as calculated using British Holiday & Home Parks Association / Visit Wales Economic Impact Assessment of the Holiday Park Industry in Wales. This represents a significant positive contribution to the local economy arising from the development.

- 6.69 Further to those direct benefits, the proposals by their nature and use year round will provide a continuity of positive economic impact and local spend to the area and not just during peak holiday times.
- 6.70 Having regard to CS policies E4 and RA6 and NPPF paragraph 83 and 84, the proposal is considered to comply with the economic aims and objectives of these policies and is a wholly suitable and sustainable form of rural economic development having regard to both the site's location and taking account of existing lawful uses on the site and its redevelopment. Furthermore as detailed above, the proposal addresses the technical requirements as relates to highways, design, landscape, ecology and amenity required by CS policies E4 and RA6, Bleathwood and Little Hereford NDP policies BLH18 and the NPPF as a whole.

Highways

- 6.71 It is noted one of the most significant matters of public concern, as shown within representations received, relates to highway safety.
- 6.72 Whilst the concern of the local community is noted, as set out above, Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states *"If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."* The development plan is the Herefordshire Core Strategy and the most relevant policies on the matter are SS4, MT1, RA6, E4 and BLH18 of the NDP.
- 6.73 As such, lawful assessment and acceptability of the proposed access arrangements must be made against these policies. Further to this, the NPPF is a material consideration and paragraphs 108 – 111 most relevant, with paragraph 109 stating *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.*
- 6.74 It is noted that the number of lodges on the site has been reduced from 60 to 45 and inevitably as a consequence this will reduce movements to and from the site and over the local road network. The number of vehicle movements expected to be made by the lodge accommodation during a changeover day (07:00-19:00) and modelled 'worst case scenario' is 207 movements, with 101 arrivals and 106 departures.
- 6.75 The existing Bleathwood Lodges and The Bluestone Centre generate, on a typical weekday, some 186 vehicle movements. Furthermore, the existing consents and permissions for the site would allow a very significant uplift in the accommodation on offer at the site, and therefore the traffic generation associated with these uses would also increase. The consented number of touring pitches in particular would in turn increase the number of larger vehicles involved, including tourers and caravans accessing and egressing the site and Bleathwood Lane.
- 6.76 It is acknowledged the most recent previous permission was assessed by the local authority and the same means of access to be utilised here by the proposals were considered to be acceptable. This position would have taken into account existing uses and trip rates generated on and from the site.
- 6.77 Further to the above the two way traffic flow on the C1054 is recorded as 414 movements per day on a 5 day average, reducing to 371 per day over a 7 day average. The 85th percentile speeds recorded in the survey are 34mph northbound and 35.1 mph southbound. These two way flows equate to peaks of between 40 and 60 per hour. It is noted that the site is located in relatively close proximity (c150m along a C class route) to the A class road network in the north of the county.

- 6.78 The traffic flow on the A456 as recorded is relatively light for an A class road, and combined with the light flows on the C1054 it is clear that whilst the proposed development will lead to an increase in trips generated by the site these will not lead to a capacity issue that could be classed as severe as set out in the NPPF (Para. 109). This is further evidenced when considering the potential trip generation as a result of the existing use of the site.
- 6.79 The main area of clarification has been addressed by further details regarding the suitability of the junction of the C1054 and the A456, shown below, for catering for the demands of the development. A transport addendum has been provided which sets out both the existing 'permitted' development movements and also considers the revised masterplan with the reduction in units (and as a result the reduction in traffic movements). It is noted there are no personal injury accidents which occurred within the 5 year period to date on Bleathwood Lane or at the above junction of Bleathwood Lane with the A456.



- 6.80 With regards to the ability of Bleathwood Lane to accommodate any additional traffic flow from the site, in any of the development scenarios an assessment of operational capacity and performance of Bleathwood Lane and the A456 has been undertaken. The spare capacity was calculated as 98% spare capacity on Bleathwood Lane and as such the road can support a considerably higher amount of traffic than exists now or is proposed by the development. Furthermore, the development proposals will not significantly or materially increase the level of traffic using the junction, and will remove from the junction, tourers and caravans that presently access the site in its existing, permitted use.
- 6.81 This clarification has been assessed by the Transportation Manager and it is concluded the proposal is acceptable to the local highway authority, taking into account the content of the NPPF paragraph 109, and as a result there are no highways objections to the proposal as amended.
- 6.82 The proposed site access accommodates a 2.4m x 59m splay in each direction as set out on the submitted plans. The hedgerows should be set back sufficiently to allow for seasonal growth to not obscure the visibility line and in order to ensure this is delivered an appropriate condition securing the implementation and retention of the splay is recommended.

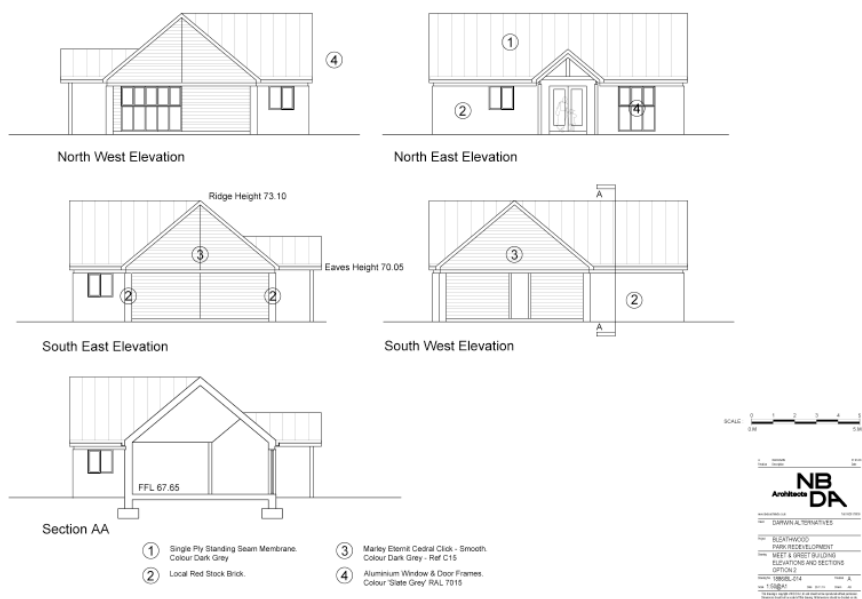
- 6.83 The Transport Assessment sets out amendments to the access to accommodate the increased traffic flows for future users and the construction phase traffic. This includes mention of the requirement to manage the construction phase so in the event that a 'temporary' access is required this should be set out so that it can be considered for its acceptability. Linked to this point it is felt that the conditioning of the Construction Management Plan would be beneficial to build on the content of section 7.1 of the TA and ensure that acceptable measures are put in place to appropriately mitigate the impact on the highway network. This should consider a before survey undertaken in conjunction with Herefordshire Council's Service Provider, BBLP to ensure that any exceptional damage as a result of the lodge importation is subject to appropriate remedial work.
- 6.84 The provision and content of the travel plan submitted is appropriate for this stage of the development. However to ensure that the travel plan is both implemented and developed in accordance with the undertaking set out here, it is recommended that an appropriate condition is applied and which will include monitoring of and as appropriate, updating of the Travel Plan over the developments' lifetime.
- 6.85 In terms of sustainable travel options to the site, it is recognised that these are likely to be limited to recreational travel around the rural roads in the vicinity of the development. Whilst this is not ideal, it is clear that given the current land use at the site this is considered acceptable. The provision of secure cycle parking should be encouraged to allow for guests wishing to access the site, or the local area via cycle to securely store their bicycles and charging points for electric vehicles also provided.
- 6.86 It is however also worth noting visitors will have ready and immediate Access onto the PROW network as a PROW intersects the site and in turn links up with other routes and walks. Neither The Ramblers' Association of the Council's PROW Officer raises any in principle objection to the proposals.
- 6.87 It is noted that parking around the site is dispersed with the exception of small car parks near to the key buildings. This level of parking is considered adequate to prevent parking being displaced onto the adjacent highway network and is therefore acceptable.
- 6.88 It has been demonstrated that a satisfactory access strategy can be provided. The proposals therefore meet the objectives of Policy SS4, MT1, E4 and RA6 and Bleathwood and Little Hereford NDP policies BLH18 to a sufficient or appropriate level. Furthermore the requirements of NPPF paragraphs 108 – 111 are also satisfied as assessed above. The highways network can accommodate the development without an unacceptable impact on highway safety and the impact on the road network is not severe.
- 6.89 With the proposed appropriate mitigation measures, it has been demonstrated that the local highway network can absorb the traffic impacts of the development without adversely affecting the safe and efficient flow of traffic on the network and that traffic impacts can be managed to acceptable levels to reduce and mitigate any adverse impact from the development.
- 6.90 Given the additional information that has been provided by the applicant, the access and movement arrangements within the submitted application are considered to be acceptable. The highway authority therefore has no objections to the application. There are, as explicitly directed by NPPF paragraph 109, no technical or policy reasons to refuse the application on highway grounds.

Design

- 6.91 Notwithstanding the landscape assessment, CS policy SD1 requires that new buildings should be designed to maintain local distinctiveness through incorporating local architectural detailing and materials and respecting scale, height, proportions and massing of surrounding development,

While making a positive contribution to the architectural diversity and character of the area including, where appropriate, through innovative design and safeguard residential amenity for existing and proposed residents.

- 6.92 To replace demolished structures and upgrade the facilities and experience on offer a number of new buildings are proposed. Amended Plans received in response to comments has resulted in significant changes to the proposed built-form, reducing the size of the meet-and-greet building by 27% and simplifying the housekeeping building. As part of that design review and comments received on the colour and architectural treatments of both buildings, further amendments have been made from the original submitted information.
- 6.93 A new Meet & Greet Reception building is proposed which is a simple single storey pitched structure (Eaves Height 7.05metres, Ridge Height 7.31metres) and will contain and be used for Reception / Check-in and Administration functions. It is emphasised the originally proposed Café and Convenience Shop have been removed (and not replaced elsewhere on site) as part of the amended plans received and the buildings' reduction in size.
- 6.94 The proposed building is shown below and has a gross external area of 98 sq. m. The design of the building is a contemporary version of a simple single storey barn. The side walls are finished with an orange/red stock brick laid in a natural mortar. The gable ends are slightly recessed and will be finished in either black Marley eternity Cedral 'Click' weatherboarding or glazing in black powder coated aluminium frames. Either approach represents an appropriate response to context in both material, colour and appearance. The pitched roof is finished in a dark grey single ply membrane with an applied standing seam, which again is appropriate in landscape terms. The ridge height of the proposed building is significantly less than that of the existing retained house (which is 7.529metres).



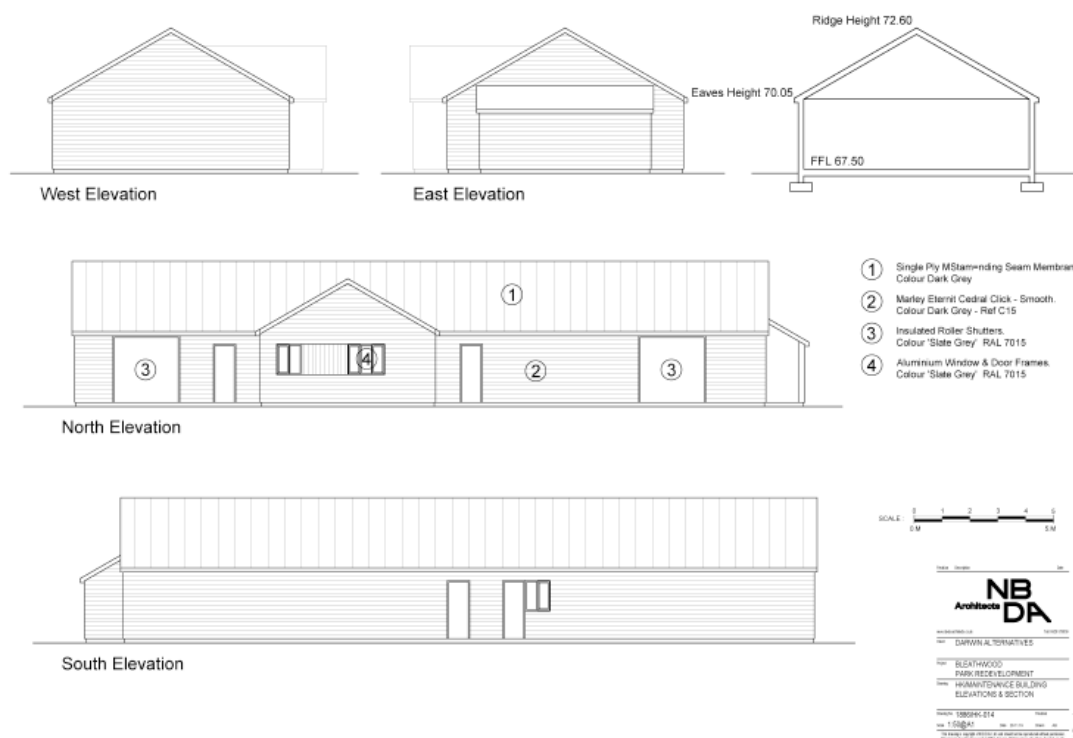
- 6.95 The meet-and-greet building has been as stated, reduced in size since the original submission and the materials selected reflect the local vernacular with contrasting local red brick and dark grey cladding and roofing. As the building is reduced in size and set back in a landscape setting, the contrasting materials and high quality finishes will provide an appropriate sense of arrival for guests, representing a significant improvement over the existing built-form it replaces.
- 6.96 The operation of the site requires a maintenance and housekeeping building the gross external area of which is 227 sqm. The proposed building contains:

- Covered area for Equipment / Vehicle and Buggy Storage

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- Repairs Workshop
- Maintenance Office
- Laundry and Inventory Store
- Housekeeping Office
- Shared Staff Room
- Toilets and Shower
- Covered area for Dirty Linen Racks

6.97 The building is a simple single storey pitched roof construction, with an eaves height of 70.05 and ridge height of 72.60. The proposal again is influenced and based on agricultural barn and clad the roof in a grey single ply membrane with applied standing seam, and the walls in black Marley eternity Cedral 'Click' weatherboarding, as shown above, to create commonality with the other new Building.

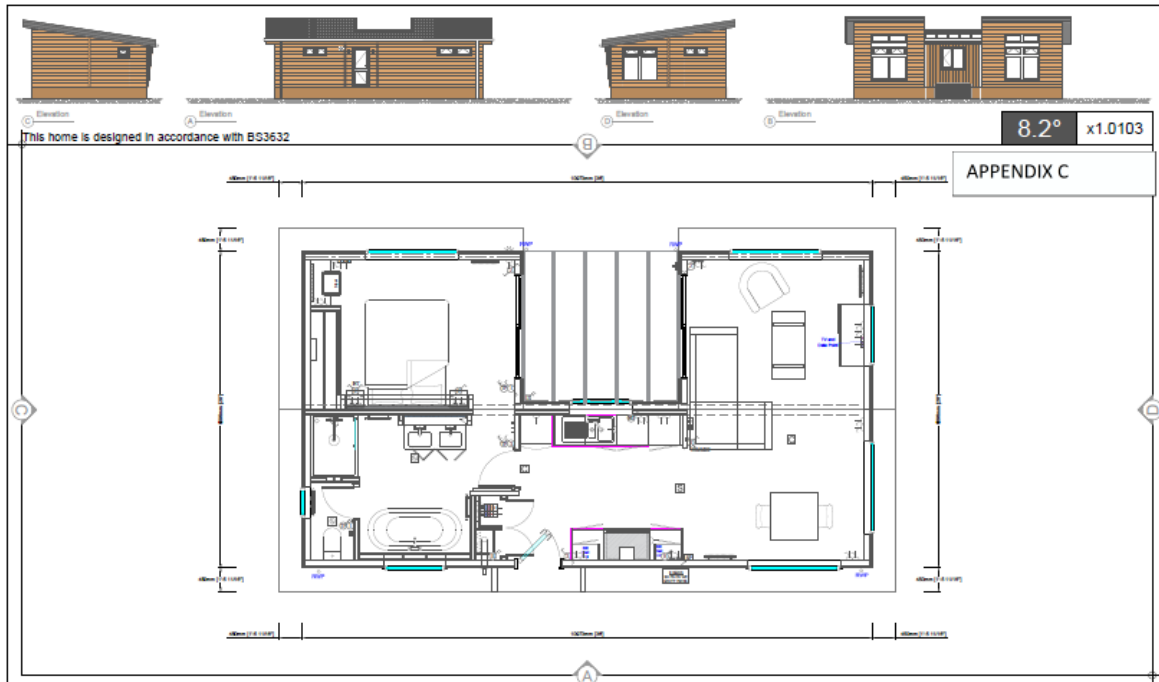


- 6.98 The housekeeping building northern elevation has been simplified so the building is more akin to a barn and the colour and materials sensitively revised to 'tone' rather than contrast with each other. Colour choice has also been considered in the context of some of the meet-and-greet finishes and the desired lodge colour range. As such it now represents an appropriate design and landscape response to its setting and location.
- 6.99 The holiday accommodation Although "lodges," with the external appearance being that of timber cladding, all of these lodge units are caravans by definition under the Caravan Sites and Development Act 1960, which are manufactured and delivered to the site either in single units or in 2 halves for the larger ones. The latter are assembled on each plot.
- 6.100 Each of the lodges is to be designed specifically for the Applicant rather than "off the shelf" designs to ensure that aspects of quality and individual design requirements are incorporated. This has been achieved successfully on other similar holiday parks in the ownership of the Applicant in The Lake District National Park and on the Isle of Wight.
- 6.101 The lodges will be 1, 2, 3, 4 or 5 bedroom units to offer a choice of accommodation sizes to suit various tourist needs. The mix is as follows;

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- 9 No x 1 bed lodges
- 12 No x 2 bed lodges
- 16 No x 3 bed lodges
- 6 No x 4 bed lodges
- 2 No x 5 bed lodges

6.102 The interior design will be influenced by the local environment in terms of appointment, material and furnishing choices. A one bed and a three bed unit are shown below –



6.103 Externally, the lodges will be clad in a timber effect cladding with subtle colour choices to work with the local environment and to respect aspects of visual impact from outside the site. Choices of external colour will be sensitively made to work with the Local Environment and to reduce visual impact.

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- 6.104 The lodge twin units are of varying size. The twin unit lodges are split length ways to produce individual units of 3.05m or 3.35m wide or less for transportation. All units have shallow pitched roofs with a central ridge running along the length of the roof.
- 6.105 On the basis of the above and noting the functional requirements, CS policies RA6, LD1 and SD1, relevant policies of the Brimfield and Little Hereford NDP and the design aims and objectives of the NPPF are satisfied.

Landscape

- 6.106 Landscape is assessed in the context of policies RW1 and LD1 of the Core Strategy, Brimfield Neighbourhood Development Plan, and NPPF to assess the proposals environmental impacts. CS policies RA6 and the wider economic development policies are underpinned by Policy LD1 of the Core Strategy Landscape and townscape. Development proposals need to demonstrate that features such as scale and site selection have been positively influenced by the character of the landscape and townscape, and that regard has also been had to the protection and enhancement of the setting of settlements. Development proposals should also conserve and enhance the natural, historic and scenic beauty of important landscapes and features, including locally designated parks and gardens; and should incorporate new landscape schemes and their management to ensure development integrates appropriately into its surroundings.
- 6.107 Core Strategy policy SD1 (Sustainable Design and Energy Efficiency) also seeks to secure high quality design and well planned development, that contributes positively to the character of the area and that development successfully integrates into the existing built, natural and historic environment.
- 6.108 The application and proposal itself is underpinned by a Landscape and Visual Impact Assessment, which has assessed the direct effects of the proposal on landscape resources, and indirect effects on public perception of landscape arising from change to landscape character or as a result of visual impacts. The LVIA has assessed the impact of the development one year and ten years after construction, with the latter taking account of landscaping and mitigation planting becoming established. Day and night time effects have also been considered.
- 6.109 The site has been assessed from nine viewpoints as shown on the plan below to assess and illustrate the potential extent of inter-visibility between the site and the wider landscape. The site is edged and filled red, the zone of visual influence is washed purple and viewpoints are denoted by the white circles. There are many areas of 'visual shadow' where there is no inter-visibility as a result of intervening landscape and vegetation. The strong boundary vegetation and sloping site essentially limit views from receptors to the east of the site, as experienced on views from public vantage points. A view East and West over the site from the PRoW which intersects the site is shown below –



- 6.110 Pedestrians in the study area will essentially be using the local footpath network in the immediate environs of the site and Footpath 15 which crosses the site. Residential receptors that may be affected are essentially homes to the east on higher ground looking back westwards towards the site. There are a limited number of houses visible, nestled in existing tree groups.
- 6.111 Motorists using the A456 will have very limited views into the site as the road corridor is at a lower level and the valley floor well vegetated. Travelling east, there are only views to the built southern boundary available and these would be experienced obliquely at speed and through an existing orchard. Travelling west, there is more of an opportunity to take in the southern boundary, however this is experienced at speed with intervening vegetation.
- 6.112 Motorists will also use Bleathwood Lane if they turn off the A456 and head north and whilst alongside the eastern boundary, will have views into the site. The same views will be available descending Bleathwood Lane travelling south, for the limited section that follows the site

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boundary. Of course this section is already experienced with views of the existing development on the site.

- 6.113 Overall, within the wider landscape and visual envelope, there are very few locations where views are available from the local road network as lanes are narrow with tall-sided hedgerows. If there are any glimpsed views they are experienced obliquely, at speed and mindful of oncoming traffic.
- 6.114 Potential receptor impacts which are predominantly from local footpaths in a non-designated landscape. There are no long-distance or national footpaths which might increase the value of the views experienced. The above viewpoints which have been assessed in detail are considered reflective of important experiences one would reasonably encounter of the site.
- 6.115 Overall, the LVIA assessment identified from six of the viewpoints there would be impact on visual amenity and no impact at all from one view point. From two viewpoints there would be a minor adverse to negligible impact during the operational period of the development. Six of those viewpoints were very restricted, predominantly towards existing boundary vegetation, but in some instances viewpoints are towards areas where the extant permission would see static caravans and touring caravans with no provision for landscaping. In one location no view was available and in the remaining two instances, views were less restricted where larger areas of the site were visible.
- 6.116 The majority of the viewpoints were experienced by sensitive receptors but from local public footpaths in a non-designated landscape and hence the value of the views is limited in this respect as there will be fewer receptors experiencing the view, albeit from open countryside.
- 6.117 NDP policy BLH9 – *Landscape Design Principles* seeks to protect a number of specific important identified views however none of these apply or are affected by the proposals.
- 6.118 The density of the development has been reduced from 60 to 45 and therefore offers additional area for landscape for mitigation and biodiversity enhancement and by the very nature of such a reduction in numbers (and therefore associated use) further reduces its landscape impact.
- 6.119 Many of the recommendations provided in previous comments by Officers (i.e. colour, planting, impacts on the ground around the lodges have been addressed within amended plans. both layout and design being influenced by and being a response to the site's context and location. The resultant *Landscape Proposals Masterplan* is shown below –



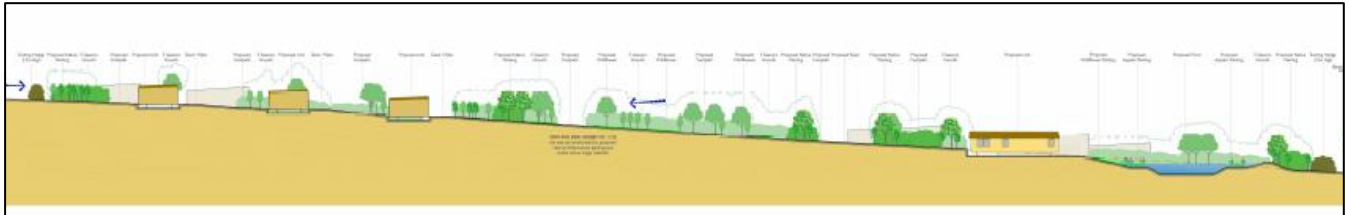
6.120 The revised layout has reduced the number of lodges in the scheme significantly and introduced more open space and native infrastructure planting within the development. There are benefits for visual amenity in terms of retaining some of the grass open slope visible from local footpaths to the east and benefits for ecology in terms of significant areas of meadow linking to the perimeter buffer zones of the original scheme. There is a benefit for lodge customers with added amenity/low-key recreational space.

6.121 The incorporation of additional space within the development has created additional opportunities for extra native planting and small copse areas and ensured that significant areas of the site will remain largely intact and touched 'lightly' with only cultivation required to diversify/introduce

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wildflower meadow areas. The introduction of open space centrally to Field A has also facilitated a more relaxed layout and road alignment that can be more easily integrated with the proposed planting by minimizing impacts further on visual amenity from the east.

- 6.122 The siting of the lodges has been carefully considered and will work closely with existing contours to balance cut-and-fill to ensure lodge units are bedded down into the landscape. In the upper sections of Field A, these lodges have been set into the landscape to allow for level access front and rear, married into the slope to pre-empt the need for retaining walls or deck balustrades to be on view from the east. The extract from the revised sections drawing shown below illustrates how lodges can be sensitively bedded into the slope with minimal earthworks so they will sit comfortably on existing slopes within an extensive native landscape infrastructure.



- 6.123 The levels will be designed to minimise cut-and-fill where possible to maintain the even fall of the existing sloping field, with resultant spoil spread evenly at nominal levels internally to ensure very discrete changes in slope. Through such sensitive introduction of the Lodges into the existing slope, this will minimise any perceptible change in contours from the wider landscape.
- 6.124 The landscape design intent is for the planting scheme is to absorb the development into a wooded slope of predominantly native, natural looking planting. Infrastructure planting throughout the application site will provide a long-term setting for development, ameliorating views and providing connectivity for wildlife between woodland on the northern and southern boundaries. The visual and physical link will be further strengthened by the introduction of small areas of woodland copses located selectively within the development and the use of climax species such as oak within planting areas.
- 6.125 The native character of the planting through the majority of the development will provide a high quality environment for lodge customers and be beneficial in terms of visual amenity and net biodiversity gain over the existing baseline. There will be further benefits in terms of visual amenity and biodiversity by the extension of the wildflower grass areas throughout the site over the submitted scheme. The landscape masterplan incorporates a significant area of new wildflower grassland which will provide a physical link between the perimeter ecological buffer zones.
- 6.126 A 10 year management and maintenance plan has been submitted fulfilling the requirements of the long term establishment and ongoing needs of the landscaping.
- 6.127 Overall, the proposed development will result in some minor adverse impacts as a result of the construction process and during the first few years of the operational period in the short Term. However, the sensitive site layout which works within the established landscape boundaries and appropriate landscape treatments, in conjunction with ecological management targets, will ensure there are no significant residual effects in the medium to long term.
- 6.128 The proposed development occupies a relatively small part of a wider wooded, rolling landscape that will now have a well designed, sustainable leisure use all year round rather than the current leisure use of mixed quality with no requirement for landscape mitigation, ecological management or improvement for tourists.
- 6.129 As such in terms of overall impact, the development proposals will not be significant and, as planting matures, the development will sit comfortably in the wider, well-wooded landscape. It

also considered there would be net betterment in landscape (and ecological) terms over the existing situation.

- 6.130 It is concluded that, the development of this site in the form proposed would be acceptable in landscape terms and with regards to the local landscape character and the character and accord to the requirements of policies LD1 and SD1 of the Herefordshire Local Plan – Core Strategy, Bleathwood and Little Hereford NDP policies BLH8, 9 and 18 and landscape aims and objectives of the NPPF.

Amenity, Noise and Light Pollution

- 6.131 The Core Strategy notes the protection of residential and local amenity is essential to ensuring local communities are and remain sustainable. Amenity considerations include such issues as noise. Policy SD1, within its list of criteria for sustainable design requires new development does not contribute to, or suffer from, adverse impacts arising from noise.
- 6.132 The NPPF paragraph 170 (e) requires the decision making process should contribute to and enhance the natural and local environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of noise pollution. Paragraph 180 requires development should mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life.
- 6.133 Currently the services on offer at The Bluestone Centre and Boxing and Fitness Centre are run in conjunction with Bleathwood Lodges and its large Restaurant/Bar (circa 150 capacity that is proposed to be demolished as part of these proposals) attract a broad range of visitors, at varying hours of the day and evening. The proposals include only a small Meet & Greet Building with, as detailed on amended plans, no café facility which is now removed to further reduce the size of the proposals.
- 6.134 Furthermore a number of actions and policies would be implemented by the applicants, and visitors would be informed of these via welcome and information packs. Visitors will be required to keep noise to a minimum between the hours of 20:00 and 09:00, with the site operating a no noise policy after 23:00. The site will also commit to working with their suppliers to encourage them to avoid deliveries / waste collection before 08:00 and after 20:00 and a condition to this effect is recommended by Officers and is not dissimilar to conditions used on A1 foodstores in or adjoining residential areas. A complaints procedure will also be maintained by the site for the duration of the site's operation, ensuring that any complaints relating to noise are recorded and investigated, as appropriate. The site's general manager will also actively engage with the local community and be readily available to receive feedback about the operation of the site.
- 6.135 Such requirements and 'site rules' are common on such accommodation facilities where the USP is a tranquil relaxing stay in a countryside location. It is noted none of these restrictions are currently in place and therefore the proposals offer the opportunity to deliver these further improvements which benefit the amenity of the area.
- 6.136 A Noise Impact Assessment was submitted with the application and this and the proposals have been assessed by the Council's relevant Environmental Health Officers who advise from a noise and nuisance perspective our department has no objections to this proposal. The supplied noise management plan as part of the application is considered to cover the essentials for noise control and minimisation of noise nuisance to neighbours. Having regard to the rural nature of the location, a condition preventing the use of fireworks and Chinese lanterns on the site is recommended for both amenity and ecological reasons.
- 6.137 To ensure in the longer term, adjoining residential amenity, a condition for The Noise Management Plan supplied to be subject to a documented review on at least a yearly basis is

recommended so to ensure its anticipated suitability remains and it actively does what it is supposed to do.

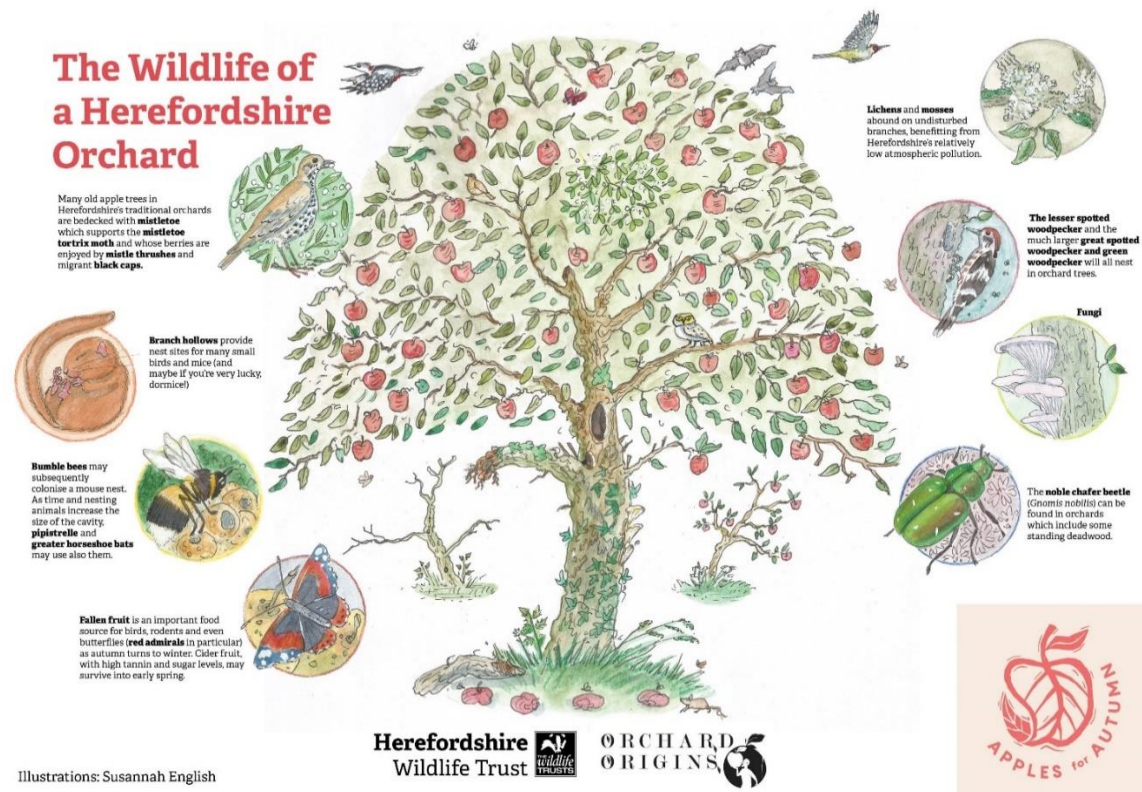
- 6.138 The proposed development is likely to generate significant impacts during its construction phase as a result of noise and vibration. There would also be increased traffic movements associated with the construction phase. Both construction traffic and noise/vibration would be temporary and shall be controlled through best practice guidelines which includes conditions securing agreement of a *Construction and Environmental Management Plan* to cover the build phase and will detail amongst other matters, permitted hours of construction and other such protection to local residents and environment. This approach is supported by Environmental Health colleagues with regards to protecting adjoining residential amenity.
- 6.139 In terms of traffic movement during operation, the site benefits from consent for a touring caravan and camping site. The proposed use would represent an intensification of that use, but it is not likely to be significant from a noise perspective and it is noted the cessation of caravanning pitches on the site would be advantageous in terms of reduced impacts on the local road network (eg reversing, holding up traffic, etc).
- 6.140 There is the potential for light pollution as a result of the proposals. This however is to be managed through a sensitively designed lighting scheme controlled by condition and is not considered to present significant effects on the surrounding environment. A Lighting Plan would detail luminosity levels and include the lighting specification and indicative gradient of light illuminance, which would be required to deliver and demonstrate minimum light spillage. Low level lighting bollards are used across the site as is common on such developments, and are fitted with low energy soft LED light fittings. Subject to precise specification these will be acceptable in principle with regards to ecology as demonstrated on other developments around the county and as agreed and supported by the Council's Ecologist. It is again noted no such lighting controls cover the site and as such there will be further betterment from the proposal with regards to this aspect.
- 6.141 The amended proposal includes the reduction in building size and density, which will further reduce lighting for the site. Furthermore amendments from the original proposals to reduce the duration of evening entertainment and reduction in site accommodation will improve noise volumes, reduce public use and therefore achieving less amenity impact and ecological disturbance, in particular disturbance to nocturnal species.
- 6.142 The nearest residential receptor (Lock Cottage) is approximately 30m south east of the site. Park Villa is also approximately 50 metres to the east beyond Bleathwood Lane. Overall it is considered the proposal will have no significant impact on amenity of adjoining residents or the locality. The proposals represent improvement in amenity through the consolidation and regulation of uses and activities of the site which will be subject to operational and planning controls, along with a reduction in the activities on the site. As such CS policy SD1 is satisfied along with Bleathwood and Little Hereford NDP policies BLH8, 9 and 18 and the relevant requirements of NPPF paragraph 127 and 180.

Ecology

- 6.143 Policy LD2 of the Herefordshire Local Plan - Core Strategy requires development proposals to conserve, restore and enhance biodiversity through the retention and enhancement of nature conservation site and habitats and important species. Policy LB2. This is also supplemented and underpinned by Core Strategy policies LD2 – *Biodiversity and geodiversity* and LD3 – *Green infrastructure*.
- 6.144 Policy LD2 states *Development proposals should conserve, restore and enhance the biodiversity and geodiversity assets of Herefordshire, through the:*

1. retention and protection of nature conservation sites and habitats, and important species in accordance with their status
2. restoration and enhancement of existing biodiversity and geodiversity features on site and connectivity to wider ecological networks; and
3. creation of new biodiversity features and wildlife habitats.

- 6.145 The advice in Chapter 15 of the NPPF, *Conserving and enhancing the natural environment*, reinforces this, stating *promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.*
- 6.146 The application submission has been supported by an Ecological Assessment in which extensive surveying and assessment has been undertaken. An Arboricultural Assessment was also submitted. The Ecological Enhancement and Mitigation Strategy proposed is supported by the Council's Ecologist.
- 6.147 The application site comprises largely of two improved grassland fields, with an orchard, hardstanding, buildings, a pond, a series of hedgerows and ruderal vegetation and scattered scrub. The majority of the development site is currently considered to be of low ecological value, However there are some features of high ecological value such as the boundary hedgerows and longer grassland features, which are to be retained and protected within the proposed redevelopment of the site.
- 6.148 Currently, pre development, there is a total of seven hedgerows across the site of mixed species value. This habitat type is listed on Section 41 of the Natural Environment and Rural Communities Act (NERC) 2006 as a habitat of principal importance to the conservation of biodiversity in England. All the existing hedgerows are to be protected and retained and enhanced as necessary within the redevelopment of the site and a series of new native and species rich hedgerows will be planted across the site; with the most significant of these planted alongside the Public Right of Way (PRoW) running east-west across the site.
- 6.149 An orchard is present towards the south of the site, which is to be retained, protected and enhanced. This comprised five lines of planted fruit trees, spaced circa 5 m apart. The planted trees included apple, pear, blackthorn and cherry. Orchards are listed as a BAP habitat, and so this will be retained, protected and enhanced through the redevelopment of the site. The ecological and habitat value of orchards are well known and promoted by this Council and the Herefordshire Wildlife Trust diagram *The Wildlife of a Herefordshire Orchard* below, pictorialises this very well –



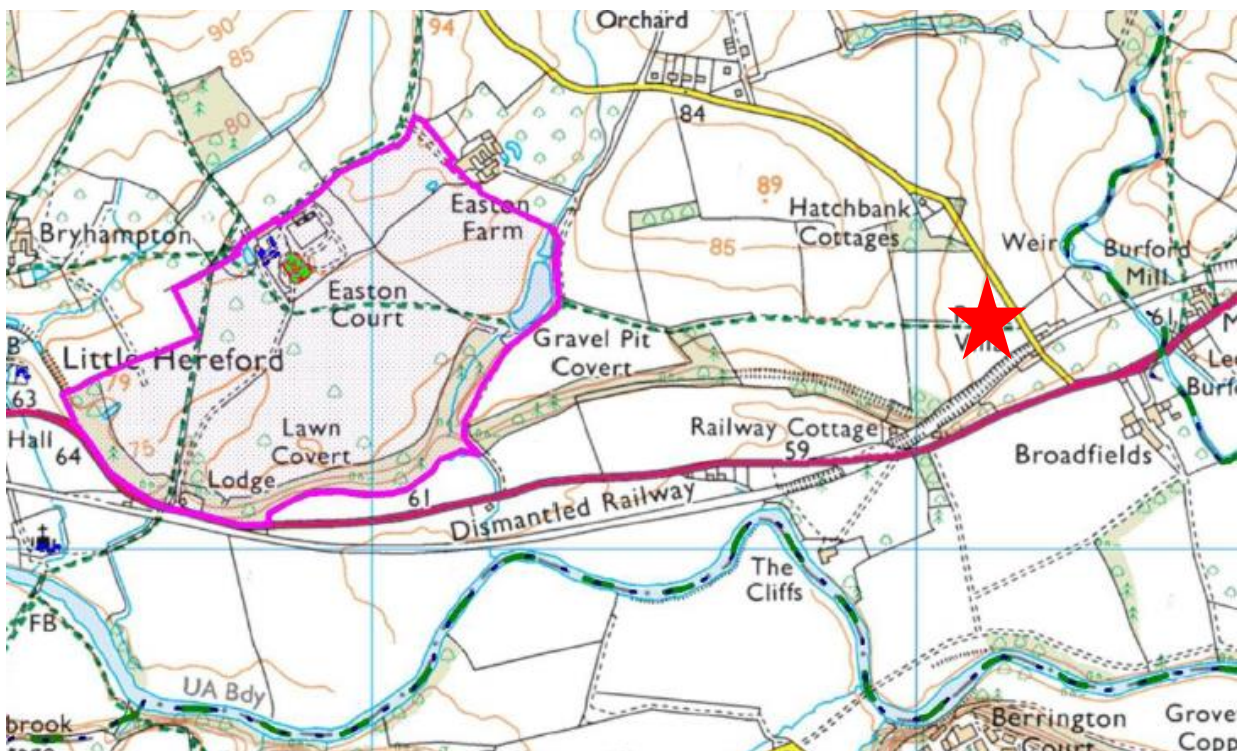
- 6.150 The site has a small area of woodland present towards the south-west corner of the site; which is dominated by single stem sycamore. The understorey is sparse and dominated by nettles and ground elder. A number of the sycamore trees present within this woodland are failing, and so recommendations have been made to coppice / remove select trees to ensure that the woodland copse remains viable in the longer term and new native tree and woodland planting will be included within the scheme, to strengthen the existing site boundaries, and to provide further green corridors of movement across the site. The planting of new tree and woodland habitat will also provide new habitat on site for a range of species, such as dormice and bats.
- 6.151 Along with the substantial new planting proposed as detailed within the *Landscape* section of this Report, the retention and integration of existing on site habitats with these proposals underpins the site wide landscape and ecological strategy. Targeted habitat enhancement is proposed for dormouse, bat, bird and badger species. It is noted there is no objection from Natural England and the Council's Ecologist's comments have been addressed and recommended conditions attached to the recommendation below.
- 6.152 Amendments secured by Officers from the original proposals to reduce the duration of evening entertainment and reduction in site accommodation will improve noise volumes, reduce public use and therefore achieving less ecological disturbance and in particular disturbance to nocturnal species.
- 6.153 Natural England has no objection and with specific regard to the River Teme Site of Special Scientific Interest, Natural England considers that the proposed development will not damage or destroy the interest features for which the site has been notified and has no objection. Both Natural England and the Council's Ecologists are extremely mindful of the phosphates issue within Herefordshire and upon review of the application, neither raise this matter as a concern here.
- 6.154 Objections to the application also raised potential drainage issues as a significant concern. From the advice provided by Natural England and my Ecology colleagues, Drainage conditions will secure the appropriate mitigation. Prior to the commencement of the development details of the

proposed foul and surface water drainage arrangements are required be submitted to and approved in writing by the local planning authority.

- 6.155 Overall it is considered the development provides additional biodiversity net gain through enhanced habitat provision and connectivity, which in turn has an increased amenity value, whilst also reducing risks to local environments through matters such as lighting and noise controls secured by condition. As such CS policies LD2, LD3 and SD4 and Bleathwood and Little Hereford NDP policies BLH9 and 12 are satisfied.

Heritage

- 6.156 When considering the impact of a development proposal upon the setting of a Heritage Asset, there are several stages. Firstly identifying those assets which may be affected and their significance. Then those aspects of their setting which contribute to the significance are identified and lastly the impact of the development upon this significance. It should be noted that a view to or from a Heritage Asset does not necessarily mean that a site is within that assets setting, this depends upon whether that view contributes to the significance of the asset. Also a site can be within the setting of a heritage asset without their being a direct view under certain circumstances. The fundamental principle is whether or not a development affects the significance of a heritage asset, including those aspects of its setting which contribute to its significance.
- 6.157 The site is not within a conservation area nor does it contain or adjoin any designated heritage assets. The nearest heritage assets are the Grade II Easton Court and its associated Grade II stable buildings to the East which are within an unregistered park and garden of which that area is over 800 metres away to the West and its nearest point. These assets and their relationship with the application site, denoted with the red star, are shown below, with the extent of the unregistered park and garden outlined in purple –



- 6.158 On the basis of the intervening distances and topography and also taking into account the design of the proposals and mitigation proposed it is considered there is no new or detrimental impact on the character, appearance or setting of designated heritage assets from the proposal. As such CS policy LD4 and the conservation aims and objectives of the NPPF are satisfied.

Drainage and Flood risk

- 6.159 The nearest watercourse is Ledwyche Brook which is located approximately 150 m east of the Site. Ledwyche Brook is an Ordinary Watercourse and flows in southerly direction before discharging into the River Teme approximately 1 km south east of the Site. The River Teme is defined by the Environment Agency as a Main River and is located approximately 300 m south west of the Site at its nearest point. The Teme flows in a south easterly direction within the vicinity of the Site.
- 6.160 The Environment Agency's Flood Map for Planning indicates the Site is wholly located within Flood Zone 1 whereby the land is classified as having a less than 1 in 1,000. The Site is shown to have a 'Very Low' risk of surface water flooding, that is flooding occurring as a result of rainfall with less than 1 in 1,000 chance in any given year.
- 6.161 Relevant records indicate there are no boreholes within or immediately surrounding the Site and the Site is not located within a groundwater Source Protection Zone.
- 6.162 Policies SD3 and SD4 of the Core Strategy seek to ensure that matters of flood risk and drainage are considered. Welsh Water, as the statutory consultee have been consulted and, subject to a condition that ensures that a connection is made in a specific location and there being no surface or land drainage discharge to the mains system, they raise no objection. As such, whilst noting the concerns raised locally about capacity, officers conclude that the proposals comply with the requirements of policy SD4 of the Core Strategy.
- 6.163 Matters of flood risk and surface water drainage have also been carefully considered against the above policies and NDP policies BLH12 and 16 in the detailed response from the Land Drainage consultant as detailed at paragraph 4.11 of the Report. The drainage submission has been assessed in significant detail following concerns raised through the consultation process, with the applicant providing further assessment and details to the eventual satisfaction of the Council's qualified Drainage Engineers.
- 6.164 The applicant is proposing a private foul pumping station and rising main using directional drilling. There are also proposals for a new sewer in the highway (at the connection point) that will be adopted by Severn Trent.
- 6.165 Each holiday lodge is a caravan by definition and in accordance with BS3632. The Water Regulations require that all calculations for water consumption and sewage disposal are based on the single criteria of 4 persons at 150 litres per second per caravan per day. This amounts to 600 litres per caravan per day. It should be noted beyond the Meet and Greet facilities there is no other facilities. The rate of sewage generated as a maximum for the development is therefore 45 lodges at 600 litres per unit per day amounts to 27,000 litres per day maximum.
- 6.166 Severn Trent Water Authority has confirmed connection to the adopted sewer network is permissible and the nearest foul manhole to the site is 2km to the east along the A456. a private foul pump station and rising main along the A456 to this manhole under a Section 50 Highways License will be used and all the foul sewage from this proposal is discharged directly to main sewer rather than utilising an onsite treatment system. The approach accords with the preferences of CS policy SD3 and NDP policy BLH12.
- 6.167 The surface water drainage calculations demonstrate that the surface water strategy, which includes the use of two on site ponds, is acceptable and as such there are no objections to the development on drainage grounds. Recommended conditions secure drainage matters further. As such CS policies SD3 and SD4 and Bleathwood and Little Hereford NDP policies BLH12 and 16 are satisfied.

Other Matters

- 6.168 **Loss of Boxing and other facilities** – The boxing facility is well regarded and has benefited many youngster from difficult backgrounds. Indeed it is through this and other work the current site owner has been honoured by this country with an MBE. The loss of this facility however must be balanced against the overall planning benefits, which as detailed above are wide ranging and significant. Even if one was to conclude there was harm in the planning balance from this loss, it is considered that harm is significantly outweighed by the benefits which include social, economic and environmental betterment to the site and area. It is also noted the existing site and facilities are not explicitly protected within the Neighbourhood Development Plan.
- 6.169 It is also noted the boxing facility could be relocated with relative ease to, if within Herefordshire, Leominster or any one of the sustainable settlements listed under CS policy RA2 or come forward in a barn conversion scheme. Availability of alternative and even better sites for this use will be more widespread than suitable sites for the tourism proposal assessed here.
- 6.170 **Demolition of Existing Buildings** – As part of the Parish Council objection they state *all existing buildings bar one are to be demolished, policy BLH18 states that existing buildings should be re-used*. The actual policy states 'Where feasible, the development involves the re use of existing buildings'.
- 6.171 There is nothing within the policy to compel a developer or development that it must re-use existing buildings. With regards to the proposal, those existing buildings to be demolished and replaced have no designated or local heritage value (they are not identified within the NDP as local undesignated heritage assets) and furthermore can be considered detrimental to the character and appearance of the area and unsuitable and insufficient for conversion to the proposed uses.

Environmental Impact Assessment

- 6.172 Officers have undertaken a Screening Opinion on the application and concluded an Environmental Statement is not required. The application site does not contain any 'sensitive areas' as defined by Part 1 of the Regulations. The nearest 'sensitive areas' are the River Teme is a SSSI which lies approximately 360 metres south and an Ancient Woodland which is approximately 360 metres west.
- 6.173 The Local Planning Authority and that of its officers through internal consultation would agree with the submitted details in regards that the potential the greatest impacts arising from the development might be the visual impact as some however the harm would be localised and not be at a 'significant' level upon the landscape and in regards to traffic and transport. The cumulative effect of introducing a holiday lodge proposal of this scale will impact the area in terms of increased traffic movements, visual landscape impact and ecology, however it is not considered that impact would be significant, particularly through suitable mitigation proposals.
- 6.174 Having had regard to the characteristics, scale and potential impacts of the development, the likelihood of significant adverse environmental effects is considered to be low risk.

ADOPTED SCREENING OPINION

It is the opinion of Herefordshire Council as Local Planning Authority that the proposal set out above **is not** an EIA development under Schedule 2 and the indicative criteria/thresholds in the National Planning Practice Guidance **Therefore an Environmental Statement will not be required.**

The development is considered to be listed in Schedule 2 but falls below all the thresholds and is not within a sensitive area.

Summary and planning balance

- 6.175 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states as follows “*If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.*” The development plan is the Herefordshire Core Strategy and Brimfield Neighbourhood development plan.
- 6.176 In accordance with s.38 (6) of the 2004 Act, the application must be determined in accordance with the development plan, unless material considerations indicate otherwise. The Core Strategy constitutes a spatial strategy and policies designed to achieve sustainable development under the three objectives; social, economic and environmental. As concluded above the proposals are considered to accord with the development plan through meeting the criteria of relevant plan policies. This includes the policies of the Neighbourhood Development Plan. The NPPF, a material consideration, also seeks sustainable development through the economic, social and environmental objectives for planning. To enable a conclusion to be reached on whether the application proposals are in accordance with the development plan and to take account of material considerations, I now consider the benefits and impacts of the proposals against each of the three roles or dimensions of sustainable development in turn.

Turning to the three objectives of sustainable development;

Economic Objective

- 6.177 A key aspect of the economic role played by the planning system is to ensure that sufficient land of the right type is available in the right places and at the right time to support growth.
- 6.178 In this context, the proposals score, in economic terms at least, positively. The proposal could help to support economic growth arising from:
- employment and supply of associated materials, goods and services in the construction phase
 - support to local services and facilities arising from the users of the site
 - employment and supply chain opportunities from the local area
- 6.179 The positive economic benefits arising from the scheme are significant, and will include direct economic betterment for local shops and businesses along with employment opportunities. On the basis of the scale and nature of the development I attach significant weight to these benefits noting the limited opportunities there are in such an area for such substantial inward investment.

Social Objective

- 6.180 Planning’s social role incorporates providing support to strong, vibrant and healthy communities, by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well being.
- 6.181 The proposal delivers upgraded tourism facilities which helps meet demand now and for the future. The delivery and use of the development will contribute to the social wellbeing of the area through occupiers using and contributing to the areas existing social life and supporting facilities, events and services. Furthermore the development represents a planned response to tourism through the significant upgrading of an existing site which has lawful tourism related uses.
- 6.182 As such the *social* objective is considered to be satisfied and I attribute significant weight to the benefits in community terms, particularly to the support of sustainable communities, employment

opportunities and a sense of place the development will secure and delivering the planned economic growth of the area.

Environmental objective

- 6.183 The environment objective requires consideration of how the development contributes to protecting and enhancing the natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution and mitigating climate change (low carbon economy).
- 6.184 The proposal will enable more sustainable patterns of activity through providing tourism facilities that enable use and enjoyment of the countryside as a resource through being located in an undesignated landscape area, with no impact on heritage assets, and with ready access onto an A class road. The proposal forms redevelopment of an existing brownfield site which features unrestricted tourism and other facilities and as such enables controls to be brought in which represent enhancement to amenity. The significant landscape planting represents landscape and biodiversity and habitat gains which are significant and beneficial over the existing situation.
- 6.185 Taking all of the above into account, officers consider that the public benefits arising from the scheme, as outlined above are positive. There is no evident harm arising in relation to other technical matters as discussed above, and officers do not feel that the impacts of the development should tip the planning balance in favour of refusal. As such I attach positive weight to the proposals as their delivery will also enable defence against the existing and potential future on site development and land uses and activities that would be or is harmful in environmental terms.

Conclusions

- 6.186 Policy SS1 of the CS reflects the presumption in favour of sustainable development in national policy and provides that planning applications that accord with the policies in the Core Strategy will be approved unless material considerations indicate otherwise. Policy SS1 also aligns itself with NPPF paragraph 11 and as a matter of local plan policy states *Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the council will grant permission unless material considerations indicate otherwise.*
- 6.187 The NPPF paragraph 11 provides the mechanism for the determination of the application stating:

For decision Making

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

- 6.188 As detailed above there is conformity with the relevant policies of the development plan which includes the Brimfield and Little Hereford Neighbourhood Plan. These policies are consistent with the guidance contained within the NPPF.

- 6.189 The proposal also offers, if approved, the following opportunities which are all material considerations –

- Introduce more control over the site's use, which is absent under the current permissions
- Manage how people access the site, which does not currently occur
- Deliver a more unified accommodation model
- Limit the range of facilities and remove 'entertainment' uses
- Remove the range of disparate buildings which have developed in a piecemeal fashion and detract from the rural setting
- Enhance visitor spend in the wider area and secure new employment opportunities
- Deliver significant landscape and biodiversity enhancements
- Make use of sustainable building design

6.190 On the basis of the clear direction from NPPF paragraph 11, the local plan policy and NPPF aims and objectives compliance, and there being no technical reasons or demonstrable harm to dictate otherwise, approval is recommended as the proposal represents sustainable development.

RECOMMENDATION

That planning permission be granted subject to the following conditions and any other further conditions considered necessary by officers named in the scheme of delegation to officers:

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

Reason: Required to be imposed by Section 91 of the Town and Country Planning Act 1990

2. **The development hereby approved shall be carried out strictly in accordance with the approved plans and supporting details and the schedule of materials indicated thereon unless other conditions of this Decision Notice dictate otherwise.**

Reason: To ensure adherence to the approved plans and to protect the general character and amenities of the area in accordance with the requirements of Policy SD1 of the Herefordshire Local Plan – Core Strategy and the National Planning Policy Framework

Pre Commencement Conditions

3. **No development shall commence until a fully detailed Construction Environmental Management Plan (CEMP) and named 'responsible persons' shall be supplied to the local planning authority for written approval. The approved CEMP shall be implemented and remain in place until all work is completed on site and all equipment and spare materials have finally been removed. The Construction Management Plan shall include, but is not limited to, the following matters:**

- **site management arrangements, including on-site storage of materials, plant and machinery; temporary offices, contractors compounds and other facilities; on-site parking and turning provision for site operatives, visitors and construction vehicles (including cycle parking for staff and visitors); and provision for the loading/unloading of plant and materials within the site**
- **wheel washing facilities and other measures to ensure that any vehicle, plant or equipment leaving the application site does not carry mud or deposit other materials onto the public highway; • measures for managing access and routing for construction and delivery traffic**
- **hours during which construction work, including works of site clearance, and deliveries can take place**
- **Tree / hedge protection plan for the phase of development**
- **Construction Traffic Management Plan**

The development shall be carried out in accordance with the approved details for the duration of the construction of the development.

Reason: In the interests of safeguarding adjoining amenity and uses and to safeguard protected species, wildlife and habitats and to conform to the requirements of Conservation of Habitats and Species Regulations (2017), National Planning Policy Framework, NERC Act (2006), NPPF (2019) and Herefordshire Council Core Strategy (2015) policy SS6, LD2 and LD3 Policies SD1, LD2, and MT1 of Herefordshire Local Plan – Core Strategy and the National Planning Policy.

4. With the exception of any site clearance and groundwork, no further development shall take place until details or samples of materials to be used externally on walls and roofs and for landscape surfacing (non grass areas, eg paths and tracks) have been submitted to and approved in writing by the local planning authority. Development shall be carried out in accordance with the approved details and thereafter be maintained as such.

Reason: To ensure that the materials harmonise with the surroundings, maintain and enhance the character and appearance of the locality and countryside so as to ensure that the development complies with the requirements of Policy RA6, E4, LD1 and SD1 of the Herefordshire Local Plan – Core Strategy and the National Planning Policy Framework.

5. Before any other works hereby approved are commenced, visibility splays shall be provided from a point 0.6 metres above ground level at the centre of the access to the application site and 2.4 metres back from the nearside edge of the adjoining carriageway (measured perpendicularly) for a distance of 59 metres in each direction along the nearside edge of the adjoining carriageway. Nothing shall be planted, erected and/or allowed to grow on the triangular area of land so formed which would obstruct the visibility described above.

Reason: In the interests of highway safety and to conform with the requirements of Policy MT1 of Herefordshire Local Plan – Core Strategy and the National Planning Policy Framework.

Prior to First use or occupancy Conditions

6. A landscape management and maintenance plan, including long term design objectives, management responsibilities and maintenance schedules for all landscape areas shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the development or any phase of the development, whichever is the sooner, for its permitted use. The landscape management and maintenance plan shall be carried out as approved.

Reason: In order to maintain the visual amenities of the area and to conform with Policy E4, RA6 and LD1 of the Herefordshire Local Plan – Core Strategy and the National Planning Policy Framework.

7. Prior to the first use of the development to which this permission relates the car parking shall be laid out in accordance with the details shown on the approved plans listed under Condition 2 of this Decision Notice and shall be properly consolidated, surfaced and drained, in accordance with details to be submitted to and approved in writing by the local planning authority and those areas shall not thereafter be used for any other purpose than the parking of vehicles.

Reason: In the interests of highway safety and to ensure the free flow of traffic using the adjoining highway and to conform with the requirements of Policy MT1 of Herefordshire Local Plan – Core Strategy and the National Planning Policy Framework.

8. Prior to the first use of the development hereby permitted full details of a scheme for the provision of covered and secure cycle parking facilities for visitors and staff shall be submitted to the Local Planning Authority for their written approval. The covered and secure cycle parking facilities shall be carried out in strict accordance with the approved details and available for use prior to the first use of the development hereby permitted. Thereafter these facilities shall be maintained as approved.

Reason: To ensure that there is adequate provision for secure cycle accommodation within the application site, encouraging alternative modes of transport in accordance with both local and national planning policy and to conform with the requirements of Policies SD1 and MT1 of Herefordshire Local Plan – Core Strategy and the National Planning Policy Framework.

9. Prior to the first use of the development hereby approved, a Travel Plan which contains measures to promote alternative sustainable means of transport for staff and visitors with respect to the development hereby permitted shall be submitted to and be approved in writing by the Local Planning Authority. The Travel Plan shall be implemented, in accordance with the approved details, on the first occupation of the development. A detailed written record shall be kept of the measures undertaken to promote sustainable transport initiatives and a review of the Travel Plan shall be undertaken annually. All relevant documentation shall be made available for inspection by the local planning authority upon reasonable request.

Reason: In order to ensure that the development is carried out in combination with a scheme aimed at promoting the use of a range of sustainable transport initiatives and to conform with the requirements of Policies SD1 and MT1 of Herefordshire Local Plan – Core Strategy and the National Planning Policy Framework.

10. Prior to the first use of the development hereby permitted a scheme to enable the charging of plug in and other ultra low emission vehicles (e.g. provision of outside electric sockets) to serve the staff and visitors of the building hereby permitted shall be submitted and approved in writing by the local planning authority. The scheme shall be completed in accordance with the approved details and provision retained and kept available for use thereafter.

Reason: To address the requirements policies in relation to climate change SS7 and SD1 of the Herefordshire Local Plan Core Strategy and the guidance contained within the National Planning Policy Framework.

11. Prior to any construction, a detailed scheme and annotated location plan for proposed biodiversity net gain enhancement features including significant provision for bat roosting, bird nesting, hedgehog homes and movement corridors across the site, ecological hibernacula, including dead wood and pollinating insect ‘nesting’ opportunities should be supplied to and acknowledged by the local authority and then implemented in full. The approved scheme shall be maintained hereafter as approved unless otherwise agreed in writing by the local planning authority. No external lighting should illuminate any ecologically sensitive habitats on or off the site, boundary features, watercourses or biodiversity net gain features.

Reason: To ensure that all species are protected and habitats enhanced having regard to the Wildlife and Countryside Act 1981 (as amended), Habitat Regulations 2017, Core Strategy SS6, LD2, National Planning Policy Framework (2019), NERC Act 2006 and Dark Skies Guidance Defra/NPPF 2013/2019.

Compliance Conditions

12. The soft landscaping scheme approved under condition 2 shall be carried out concurrently with the development hereby permitted and shall be completed no later than the first planting season following the completion of the development. The landscaping shall be maintained for a period of 10 years. During this time, any trees, shrubs or other plants which are removed, die or are seriously retarded shall be replaced during the next planting season with others of similar sizes and species unless the Local Planning Authority gives written consent to any variation. If any plants fail more than once they shall continue to be replaced on an annual basis until the end of the 5-year maintenance period. The hard landscaping shall be completed prior to the first use of the development hereby permitted

Reason: In order to maintain the visual amenities of the area and to conform with Policy LD1 of the Herefordshire Local Plan – Core Strategy and the National Planning Policy Framework.

13. No individual shall reside on site in any accommodation hereby permitted for more than 28 consecutive days and no more than for a total of 140 days in any calendar year.

Reason: The local planning authority wish to control the specific use of the land/premises for tourism use and not to introduce permanent residential accommodation within the units hereby permitted or over the site, in the interest of highway safety, sustainability, local amenity and environmental considerations and to comply with Policy SS1, SS6, RA2, RA3, RA6, E4, LD1, LD2, LD3 and SD1 of the Herefordshire Local Plan – Core Strategy and the National Planning Policy Framework.

14. If during the course of the development unexpected contamination not previously identified is found to be present at the site then the work shall be stopped and no further development shall be carried out unless or until the developer has submitted a written method statement to be approved in writing by the local planning authority. The method statement shall include details about how the unexpected contamination shall be dealt with. Thereafter the development of the site will be carried out in accordance with the appropriate method statement.

Reason: In the interests of human health and to comply with Herefordshire Core Strategy policy SD1 and the relevant aims and objectives of the National Planning Policy Framework.

15. The Ecological Enhancement and Mitigation Strategy, by the RPS Group dated December 2019 shall be implemented and hereafter maintained in full as stated unless otherwise approved in writing by the local planning authority.

Reason: To ensure that all species are protected and habitats enhanced having regard to the Wildlife and Countryside Act 1981 (as amended), the Habitats & Species Regulations 2017 (as amended), Policy LD2 of the Herefordshire Core Strategy, National Planning Policy Framework (2019) and NERC Act 2006.

16. The Noise Management Plan supplied with the application and as referenced under Condition 2 of this Decision Notice shall be subject to a documented review on at least a yearly basis and a copy supplied to the local authority on request.

Reasons: In order to protect the amenity of occupiers of nearby properties so as to comply with Policies SS6 and SD1 of the Herefordshire Local Plan Core Strategy and paragraph 180 of the National Planning Policy Framework.

17. The use of fireworks and Chinese lanterns shall not permitted on this site.

Reasons: In order to protect the amenity of occupiers of nearby properties so as to comply with Policies SS6 and SD1 of the Herefordshire Local Plan Core Strategy and paragraph 180 of the National Planning Policy Framework.

18. No more than 45 units conforming to the legal definition of a caravan shall be situated on the site subject to this planning permission at any time.

Reason: On the basis of the quantum of development that has been assessed as acceptable with regards to highway safety, impact on amenity, the character and appearance of the locality and impact upon wildlife and so the Local Planning Authority can regulate the density of use and o comply with Herefordshire Core Strategy policies SS1, RA6, E4, LD1, LD2, LD3 and MT1.

19. Prior to the bringing on site and installation of the tourism accommodation hereby permitted, namely the 45 no. cabins as shown on the approved plans listed under Condition 2 of this Decision Notice, the following shall be submitted to the Local Planning Authority for written approval –

- A detailed design for the surface water drain below Bleathwood Lane shall be submitted
- A drawing showing proposed ground levels in the vicinity of the southern pond shall be issued, identifying the level of the proposed adjacent site road
- The foul pumping station shall be provided with a minimum of 24 hours storage above the high level pump start level and the lowest onsite lateral connection. The pumping station shall meet Building Regulations standards Part H
- If existing tanks are to be re-used, hydraulic test results shall be presented to demonstrate the adequacy of on-line storage facilities for the storing sewage

The development shall be carried out in accordance with the approved details and thereafter be maintained as such.

Reason: To ensure adequate drainage arrangements serve the site, to prevent drainage from the development affecting adjoining land uses and to comply with Herefordshire Core Strategy policies SD3 and SD4 and Brimfield and Little Hereford Neighbourhood Development Plan policies BLH12 and BLH16

Informatives

1. Public footpath LH15 crosses the site. The path must be given a full width of 2m and hedges adjoining the public footpath must be well maintained to ensure that they do not grow and reduce this width.
2. The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against planning policy and any other material considerations. Negotiations in respect of matters of concern with the application (as originally submitted) have resulted in amendments to the proposal. As a result, the Local Planning Authority has been able to grant planning permission for an acceptable proposal, in accordance with the presumption in favour of sustainable development, as set out within the National Planning Policy Framework.

Decision:

Notes:

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Further information on the subject of this report is available from Mr C Brace on 01432 261947

Background Papers

Internal departmental consultation replies.

