

APPLICATION NO.	P15/S1998/FUL
APPLICATION TYPE	FULL APPLICATION
REGISTERED	11.6.2015
PARISH	WARBOROUGH
WARD MEMBER(S)	Felix Bloomfield Richard Pullen
APPLICANT	Rev Philip Mader-Grayson
SITE	Bridge House 72 Wallingford Road Shillingford, OX10 7EU
PROPOSAL	Change of use of land from agricultural to mixed agricultural and camping/caravan site for touring and holiday caravans.
AMENDMENTS	As supported by Applicant's e-mail dated 08 July 2015 and as amended and supported by Applicant's e-mail and revised block plan received on 21 July 2015. As supported by Flood Risk Assessment and highway assessment received on 09 December 2015. As supported by annotated block plan and revised Flood Evacuation Plan received on 27 January 2016.
GRID REFERENCE	459593/192164
OFFICER	Gabriella Brown

1.0 **INTRODUCTION**

1.1 The application has been referred to the Planning Committee at the request of the Local Member, Councillor Richard Pullen. At the meeting on 10 February 2016 the Planning Manager and Committee Chairman resolved to defer consideration of this application so that Members could visit the site. A site visit was conducted on 29 March 2016.

1.2 The application site is shown on the OS extract **attached** as Appendix 1 and it measures some 0.8 hectares. It lies on the southern side of the settlement of Shillingford, close to the banks of the River Thames. It is currently in agricultural use although the western part of the site is used as a camping and caravanning site under the auspices of the Camping and Caravanning Club (CCC) Certificated Site (CS) scheme. This scheme restricts use of the site to Members only and limits advertising to CCC and personal websites. Under that licence, the site can accommodate up to five touring caravans and motorhomes and ten tents.

1.3 The site lies within close proximity of the Grade II* listed Shillingford Bridge and is within the Oxford Green Belt. It also lies within Flood Zone 3b; the functional floodplain of the River Thames.

2.0 **PROPOSAL**

2.1 The applicant wishes to be able to attract general members of the public to the site, not just Members of the Camping and Caravanning Club. As planning permission is not required to run the campsite under the CCC CS, the planning merits of such a use have not previously been considered.

2.2 The application therefore proposes the change of use of the red-edged site area from agricultural land to a mixed agricultural/camping use. The whole of the site would be

used for camping between Easter Weekend and September (inclusive) and for the remainder of the year would revert back to the agricultural use. The applicant wishes to be able to accommodate up to five touring caravans and motorhomes (as per the existing use) and for up to fifteen tents (five more than at present). No formal pitches or areas of hardstanding are proposed, nor are any new permanent structures.

- 2.3 The plans of the proposed development are **attached** at Appendix 2. Full details of the application and the consultation responses can be viewed on the Council's website at www.southoxon.gov.uk.

3.0 **SUMMARY OF CONSULTATIONS & REPRESENTATIONS (Original & amended scheme)**

- 3.1 **Warborough Parish Council** – The PC fully supports the application, subject to the applicant limits for use as described in the application

- In our earlier response we were not aware of any neighbour concerns regarding the existing camp site. Whilst the revised proposal does not alter our original thoughts, we are concerned that near neighbours have since made known their issues with the proposal. We would now return a NO STRONG VIEWS on this application and leave it to the judgement of the SODC Planning Officers

- 3.2 **Environment Agency** – (Original comments) In the absence of an acceptable Flood Risk Assessment (FRA) we object to the grant of planning permission and recommend refusal.

Further to the submission of **further information** we can remove our objection subject to the inclusion of a condition which restricts the number of camping plots and the duration of the use as set out in the submission

- 3.3 **Historic England (South East)** – Our specialist staff do not wish to offer any comments on this occasion. The application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.

- 3.4 **Countryside Access** - No comments

- 3.5 **Highways Liaison Officer (Oxfordshire County Council)** – Initial holding objection. Access to the proposal is along a private lane in which the applicant has not demonstrated a right of access over, the 'red-line' boundary does not abut the Highway. A parking plan will need to be provided for consideration, the parking spaces will need to be to current dimensional standards

- No objection. The proposal is unlikely to result in any significant intensification of transport activity at the property. No change is proposed to the existing access arrangements. The proposal is unlikely to have a significant adverse impact on the highway network. It is my opinion that the vehicle movements associated with the proposal does not present "severe harm" as required in the recent Government guidelines in the National Planning Policy Framework to warrant a recommendation for refusal.

- Following additional information being supplied the Highway Authority changes its recommendation to a Holding Objection until further information is supplied. The Highway Authority has been made aware although there is a camping use on site for private members this application seeks the removal of this member only clause and opens it up to a general camping site open to all. This changes the planning class use

from its agricultural use to a camping site. This will increase the number of vehicles using the site and as such further information is required. In addition, given the proximity of the lights at Shillingford Bridge proposed measures to prevent obstruction of the adjacent highway during access/egress, this could be in the form of a 'Keep Clear' road marking or a yellow box junction marking for which a TRO will be required.

- **No objection.** A condition which limits the number of tent pitches to a maximum of 15 is recommended

3.6 **Forestry Officer** - The trees adjacent to the access along the eastern boundary of the field are protected by a tree preservation order. Given the existing site conditions they will be unaffected by the proposal, therefore I have no objection to the proposed change of use.

3.7 **Environmental Protection Team** - Both the tents and caravans will need to be licenced by the council for holiday use. In total 3 WC's and 1 urinal, 2 showers (or baths) and 2 WHB's with hot and cold running water are needed as a minimum for this particular site. If additional sanitary facilities are required to meet this minimum standard, then that may need to be included in this application.

I recommend that temporary permission be granted to allow the applicant fair opportunity to demonstrate that the changes proposed will not give rise to an increase in noise to neighbouring residents. This temporary permission should not be longer than two years.

3.8 **Drainage Engineer** – As there is no established use for the recreational purpose on the site an appropriate Flood Risk Assessment should be submitted and the Environment Agency consulted

- Whilst the submitted Flood Risk Statement refers to little change in the current situation with regard to flood risk, the Planning Statement refers to a potential increase in the number of tents to be provided for on the site as a result of the management changes. The site is wholly within flood zone 3 - this should be referred to in the Flood Risk Statement - together with the evacuation route in times of flood. The impact of such additional numbers on the existing foul drainage facilities (more details of which should be forwarded) should also be referred to in the submission.

Further to my previous comments the existing foul drainage should be indicated on a plan. The EA has a holding objection which they will need to confirm has been satisfied. I would only comment further to the latest submissions:

a) The evacuation plan looks to close the site based on adverse ground conditions preceding the receipt of any flood warning. Given the additional long lead-in time on the Thames till flooding follows flood warning, the plan is considered acceptable in this regard.

b) Though slightly more people will potentially occupy the site, I consider the appropriate implementation of what is the first official Flood Warning and Evacuation Plan for the site will serve to better inform site users and will not result in any increased flood risk to users.

3.9 **Conservation Officer** - No significant alteration to the setting of nearby heritage assets; no concerns with this scheme

3.10 **Economy, Leisure & Property Team (SODC)** - The tourism accommodation offered by this site currently helps to strengthen and diversify the visitor economy, which will

contribute to the economic development of the district. We would support the application seeking change of use of land from agricultural to mixed agricultural and camping/caravan site, particularly given the loss of hotel availability in the district in recent years.

- 3.11 **Neighbour Representations (9)** - The neighbour representations (both individual and group responses) can be summarised as follows:

Security

We have a young family and our main anxiety regarding the change of use is that anybody could now take a pitch without requirement for confirming their identity. The security of our property and associated insurance premiums are also a factor.

Signage

We have experienced numerous occasions where campers have wandered on to/in to our property when they were actually trying to find Bridge House. The prospect of increased numbers of campers increases this problem. There is ample opportunity for improved signage of the facilities, preferably such that is in keeping with our rural landscape

There should be clear instructions about parking, so as not to hinder access to other users of the small approach lane

Access

The application site shares a private access with a number of residential properties within close proximity.

The state of the road between Wallingford Road and the entrance to the campsite/Bridge House is in great need of repair. Its condition is only made worse by the extra volume of vehicles using that stretch of it and by the heavy nature of some of those vehicles. The road should be resurfaced and maintained to an improved condition by the applicant if this application is successful.

Most campervans attempting to access the site struggle to do so in one manoeuvre and our driveway is often used as a turning and reversing point to enable access to the site. This is unacceptable.

The flow of the busy traffic crossing Shillingford Bridge, in both directions, is already interrupted by any vehicle entering and leaving this road, and even more so by a caravan being towed.

The visibility splay to the left on leaving the lane in which the site is located on to the Wallingford Road is restricted and there are times when vehicles jump the lights and approach Shillingford Bridge on the wrong side of the road. It is necessary to pull out partially into the Wallingford Road before a clear view of approaching traffic from the Shillingford Roundabout direction can be seen.

The site should have a well-defined area for initial reception so that other vehicles using the lane have clear access.

A swept path analysis should be provided to demonstrate safe access and exit for such vehicles on to the highway along with trip generation data to enable an assessment of

the highway implications of this proposed change of use

The “Keep Clear” boxes to which the applicant refers have no relation to the access to the site. These are located adjacent to the site and serve to prevent the private access of properties from being blocked by traffic waiting at the lights.

Safety

The facilities for this site are already minimal and poorly sited, in that the lane has to be crossed to reach the lavatories, proving a risk to the campers and a problem to those who access their homes via this lane

The access from the site is blind when leaving to access Wallingford Road and it is impossible to see if anyone is about to cross and we feel the chances of an accident occurring is high.

We are worried about camp fires and all the added risks that come with outdoor fires, barbeques and gas lights

Green Belt

The principle of the proposed development is not acceptable under Policy TSM6 of the SOLP and as per the NPPF, inappropriate development should not be approved except in very special circumstances. No such circumstances have been put forward by the applicant

Noise

The existing ablutions and domestic facilities for campers are provided at Bridge House, immediately adjacent to our property. If the application is successful we would ask for a condition of acceptance to be the cessation of use of current facilities and the erection of facilities on the site itself and not 60-100m away at a residential home.

An increased number of tents and a more regularly busier site will have a significantly adverse effect on our wellbeing and peaceful lifestyle.

The site owners do not adhere to the regulations and noise (ie. shouting, laughter and music), often late into the night, is a problem

We would like to see some written camp rules about behaviour being issued and enforced, particularly for the period after 10 pm.

Noise and the smell of fires and cooking, particularly after 10 pm, should not be permitted

Flooding

This is a water meadow/flood plain, admittedly mainly in the winter, but summer floods have occurred. The water comes up very quickly and would prove a serious hazard to campers, particularly in tents.

The application site is located within Flood Zone 3 which is an area at highest risk from flooding. The submitted Flood Risk Assessment does not address the issue of a change of use of land and the increase in flood risk of such a use. Furthermore, the document fails to apply both the sequential test and the exception test as required by

the NPPF.

Miscellaneous

We have an increasing problem with rats, almost certainly linked to the chickens in this same paddock.

The litter and food waste facilities need to be strictly monitored.

We did not decide to live with a large camping site at the back of our garden. We believe it devalues the house as it is unsightly and spoils our view.

Based on the description of development the site would not be limited to touring or holiday caravans only and unless specified in the description and/or condition the site could be used for permanent residential caravans

4.0 RELEVANT PLANNING HISTORY

4.1 [P02/W1044/RET](#) - Approved (02/09/2003)

Installation of a cess pit in orchard adjacent to house.

5.0 POLICY & GUIDANCE

5.1 South Oxfordshire Core Strategy policies;

TSM1 - Tourist industry

TSM6 - Touring caravan and camping sites

CS1 - Presumption in favour of sustainable development

CSB1 - Conservation and improvement of biodiversity

CSEM1 - Supporting a successful economy

CSEN2 - Green Belt protection

CSEN3 - Historic environment

5.2 South Oxfordshire Local Plan 2011 policies;

C3 - Special character of the River Thames

C9 - Loss of landscape features

CON5 - Setting of listed building

G2 - Protect district from adverse development

G3 - Development well served by facilities and transport

G4 - Protection of Countryside

GB4 - Openness of Green Belt maintained

EP1 - Adverse affect on people and environment

EP2 - Adverse affect by noise or vibration

R8 - Protection of existing public right of way

T1 - Safe, convenient and adequate highway network for all users

T2 - Unloading, turning and parking for all highway users

5.3 National Planning Policy Framework

National Planning Policy Framework Planning Practice Guidance

South Oxfordshire Design Guide 2008

South Oxfordshire & Vale of White Horse Hotel Needs Assessment 2014

6.0 PLANNING CONSIDERATIONS

6.1 The main considerations in the determination of the planning application are:

- The principle of the proposed development (Green Belt considerations)
- The principle of the proposed development (Flooding considerations)
- Impact on the landscape, ecological or historic characteristics of the site and its surroundings
- Impact on the amenity of adjacent occupiers
- Highway Impacts
- Other considerations

- 6.2 **The principle of the proposed development (Green Belt considerations).** Policy TSM6 of the adopted South Oxfordshire Local Plan (SOLP) 2011 states that touring caravan and camping sites will be permitted within the district, provided that, amongst other criteria, the site is not in the Green Belt. In 2012 the National Planning Policy Framework (NPPF) was published and the document sets out the Government’s planning policies for England and how these are expected to be applied. Only a handful of types of development are considered to be appropriate within the Green Belt and para. 89 of the NPPF states that the provision of appropriate facilities for outdoor sport and outdoor recreation is one of the types of development that can be acceptable.
- 6.3 Your officers consider that a camping and caravan site constitutes a facility that provides for outdoor recreation and that as the NPPF is more up to date than the SOLP, the proposed use of the land in itself would not necessarily be unacceptable. It is also a material planning consideration that the land could continue to be used as a campsite under the CCC licence even if this application is not approved. Furthermore, the proposed use of the land is “temporary” in that the campsite would only operate for six months of the year and no permanent structures are required in connection with the proposed use. There are existing toilets and showers at the applicants’ property which is located on the opposite side of the private lane and further composting toilets and showers on the field which are moveable structures and do not require planning permission.
- 6.4 As further justification for the proposed use the applicant has referred to the South Oxfordshire & Vale of White Horse Hotel Needs Assessment 2014 which identified a need for the upgrade and expansion of existing hotels within Wallingford, Shillingford and Dorchester-on-Thames. It advises that there could be opportunities for other types of accommodation in the district including camping sites and that the district council needs to adopt a more flexible approach to rural tourist accommodation that considers the economic benefits of this type of accommodation.
- 6.5 A recent research report commissioned by Visit Oxfordshire and undertaken by Tourism South East measures the economic impact of tourism to the South Oxfordshire economy. In 2012, visitor activity generated nearly £200 million worth of expenditure to the district and supported around 2,794 tourism jobs in South Oxfordshire, in 2013.
- 6.6 The majority of visitors to the district are day visitors, however, the tourism accommodation offered by Bridge House enables visitors to extend their stay, therefore increasing their expenditure in the district and helping to support other visitor-related businesses locally. On average, day visitors spend £35.15 per visit, whereas those staying overnight will spend an average of £146.73. The accommodation offered by Bridge House enhances the visitor offer in the district and attracts more visitors to the area. In approving the application the diversity of the clientele would increase and the applicant aims to attract Thames Path walkers, canoeists, Earth Trust visitors and Duke of Edinburgh expedition groups.

- 6.7 Your officers therefore consider that the proposal would help to strengthen and diversify the visitor economy and thus contribute to the economic development of the district. Given the seasonal and transient nature of the proposed use as well as the fact that no operational development is required, and having regard to the more flexible stance of the NPPF to recreational facilities with the Green Belt and to the economic benefits of the proposed use, your officers consider that the proposed change of use can be justified on green belt grounds.
- 6.8 **The principle of the proposed development (Flooding considerations).**
The site lies within Flood Zone 3b (Functional Floodplain). Under National Planning Practice Guidance (PPG), sites used for holiday or short-let caravans and camping are considered inappropriate in this Flood Zone and should not be permitted. However, the application states that the site has been used for caravanning/ camping for 13 years, and the application is only proposing five more tent plots to be used in the summer months.
- 6.9 As such, the Environment Agency accepts the conclusions of the Flood Risk Assessment that was submitted by the applicant during the course of the application. They also accept that the proposed change to the use of the site in order to allow it to be occupied by the general public and with five additional camping pitches, poses no increase in flood risk, subject to the limited open season and acceptability of the Flood Evacuation Plan (FEP).
- 6.10 With regards to the FEP the Council's drainage engineer has commented that it looks to close the site based on adverse ground conditions preceding the receipt of any flood warning. Given the additional long lead -in time on the Thames until flooding follows flood warning, he considers that the plan is acceptable in this regard.
- 6.11 Though slightly more people will potentially occupy the site, the appropriate implementation of what is the first official Flood Warning and Evacuation Plan for the site will serve to better inform site users and will not result in any increased flood risk to users.
- 6.12 **Impact on the landscape, ecological or historic characteristics of the site and its surroundings.** The site comprises a flat area of agricultural land within the floodplain of the river and it is straddled to the south-east and north-west by additional land that is within the ownership of the applicant. Between the application site and the river lies Shillingford Meadow which is a District Wildlife Site. As stated above, the majority of the site is already used for camping (only the area marked on the submitted block plan as the 'secluded pitches' is not). The existing use is very informal; tent and caravan pitches are not marked out, there are no designated parking areas or hardstandings and the main toilet and shower facilities are located at the applicants' dwelling on the opposite side of the access lane. Under the current proposals, the same low-key set up is proposed with no formal marking out of pitches or parking areas, no changes to existing boundary treatments and no external lighting.
- 6.13 The supporting text to Policy TSM6 of the SOLP advises that "a comprehensive landscaping scheme is fundamental to ensure that the site does not have a detrimental impact on the surrounding landscape". It goes on to say that "particular care should be taken with the boundary treatment of a site to ensure screening of any potential visual intrusion". There is existing mature planting within the surrounding area which will provide screening during the Spring and Summer months which is when the campsite will be in use. The applicant has undertaken some additional planting on his land in the last year comprising coppiced willow along the eastern boundary of the site,

adjacent to the track leading to Boat House and some native shrubs within the field where the 'secluded pitches' are to be located. Your officers consider that in this instance, the introduction of additional landscaping around the perimeter of the site for the purpose of screening the campsite would be inappropriate as it would be harmful to the open character of the river bank. Furthermore, officers contend that it is not necessary due to the "temporary" nature of the intended use during half of the year. As no new or permanent buildings or structures are being proposed or are required for the campsite, it is again argued that no screening is necessary.

- 6.14 There is a belt of protected trees to the east of the application site and having been consulted the Council's forestry officer is satisfied that the proposed land use would have no adverse impact on those protected trees.
- 6.15 The Council's Countryside Officer has also expressed no objection to the proposal on ecological grounds.
- 6.16 The site sits to the north-west of the Grade II* listed Shillingford Bridge and views of the camp site would be possible from the elevated position of the bridge as would views up to the bridge from the camp site. Having regard to the seasonal and transitional nature of the landuse however and to the fact that no permanent structures or areas of hardstanding are proposed, your officers consider that the proposal would not have a material impact on the setting of the designated heritage asset.
- 6.17 **Impact on the amenity of adjacent occupiers.** A number of concerns over the proposal have been raised by neighbouring residents during the course of the application. Some of those concerns, such as the potential safety implications of having members of the general public staying at the site rather than registered members of the CCC, do not fall within the remit of what can be considered under the planning process. However, the potential for the proposed use of the land to disturb local residents by means of excessive noise or smells is a material planning consideration.
- 6.18 Although the proposal is for the change of use of the land from agricultural to a mixed camping/agricultural use, the fact that a campsite has been run from the site for in excess of ten years and that it could continue to be run in perpetuity even if this application is not successful is a material consideration in the determination of the application. The Council's Environmental Protection (EP) Team have been consulted and they have confirmed that no complaints have been received in the past in relation to the existing campsite use. Up to five additional tents will be allowed to pitch at the campsite if planning permission is granted and the EP team consider it is unlikely that this will have a materially greater impact on the amenity of neighbouring residents than the existing, long running use. They have recommended however that only a temporary, two year permission is granted so that the situation can be monitored and reassessed in two years time.
- 6.19 The concerns that have been raised by neighbouring residents during the course of the planning application over the general running of the site have been acknowledged by the applicant who has confirmed that they will endeavour to take action to mitigate these concerns. The onus is on the owner of the site to run it efficiently and to ensure that neighbouring residents are not disturbed by raised voices during unsociable hours or by smoke from camp fires etc. However, if neighbouring residents experience episodes of anti-social behaviour they can report it to the Council's Environmental Protection Team who will investigate the complaint and take action where necessary. Any formal complaints would be logged by the Council and would be taken in to account when the use is reassessed at the end of the two year permission.

- 6.20 **Highway Impacts.** The Highway Authority notes that, in planning terms, the proposal would change the use of the land from agricultural to a mixed agricultural/camping use. In highway terms however, the site is currently used for caravans and there is no intention to change the existing access or egress point. Whilst this may change from a private caravan site to one that will be opened up to the wider network, this does not alter or change the number of caravan pitches in operation and only five additional tent pitches are proposed.
- 6.21 The type of vehicles associated with an agricultural use would be large tractor and trailer units, feed deliveries etc. as well as smaller vehicles. When this is compared to the proposal for five caravan pitches (currently operating on site, with no increase in number) and the increase in the number of tents from 10 to 15, the level of vehicle movements and type is not considered to be of a level to justify a recommendation for refusal.
- 6.22 Whilst the existing access does not provide a 'Keep Clear' marking as initially recommended by the Highway Authority, further consideration and review of the site made this requirement unnecessary.
- 6.23 In addition, the site is located within close proximity of Shillingford Bridge and the traffic lights in operation allow for only one lane of traffic to move at any one time. Should a vehicle waiting at the access, leaving the camping site, then they will have to wait for a break in the traffic to egress the site and vice versa.
- 6.24 The Highway Liaison Officer has consulted the OCC Road Safety team to investigate the recorded injury accident list within the last five years and he is pleased to report that there have been no injury accidents reported within the vicinity of the site.
- 6.25 To conclude therefore, the increase in the number of tent pitches does not, in the Highway Officers' opinion, present "severe harm" and warrant a recommendation for refusal and the existing access is considered to meet standards and practicality in terms of highway safety.
- 6.26 Improved on-site signage could help visitors to identify the entrance to the site and thus prevent them from causing an obstruction or inconvenience to other road users and the applicant is encouraged to provide such signage at the site.

7.0 **CONCLUSION**

- 7.1 Your officers recommend that planning permission is granted on the basis that the principle of providing outdoor recreational facilities in the Green Belt is acceptable under the NPPF and that the Environment Agency have no objection to the proposal. The Highway Officer is satisfied that the proposal would not have an adverse impact on highway safety and by granting a temporary permission, the relationship of the campsite with neighbouring residents can be monitored and assessed. The proposal would also help to strengthen and diversify the visitor economy and thus contribute to the economic development of the district and is otherwise in accordance with Development Plan Policies.

8.0 **RECOMMENDATION**

8.1 **Planning Permission subject to the following conditions;**

- 1 : Temporary use of land for 2 years(trial run)**
- 2 : Approved plans**
- 3 :Specified Use (Restriction on the type of caravan and duration of site opening)**
- 4 :Specified Use (Restriction on the maximum no. of caravans and tents at any one time)**

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