February 2021 Haresfield Farms

Planning, Design & Access Statement

Extension to existing caravan store Land adjacent to Pool Farm, Haresfield, Stroud Prepared on behalf of Haresfield Farms

Pool Farm, Haresfield



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1. Introduction

- 1.1. This Planning Statement has been prepared by Savills on behalf of our client, Haresfield Farms, hereafter referred to as 'the Applicant'.
- 1.2. It supports a full planning application submitted to Stroud District Council for an extension of an existing caravan store on approximately 0.89 hectares of land to the east of Pool Farm, Haresfield ('the Site'). The extent of the Site is edged in red on the plan at **Appendix 1**.

The Planning Application Submission

- 1.3. This Statement draws upon the findings of various technical information and should be read in conjunction with the accompanying application material to provide a comprehensive understanding of the proposal and its associated benefits.
- 1.4. In addition to this Planning Statement, the following documentation is submitted with the planning application:
 - Site Location Plan prepared by TH White
 - Proposed Block Plan prepared by TH White
 - Existing and proposed floorplans and elevations prepared by TH White
 - Proposed site sections/ elevations prepared by TH White
 - Flood Risk Assessment prepared by Clive Onions
 - Heritage Statement prepared by Savills
 - Preliminary Ecological Appraisal prepared by BGS Ecology

Planning Statement Structure

- 1.5. The remainder of this Statement is set out as follows:
 - Section 2 describes the Site and its surroundings;
 - Section 3 summarises the scheme proposals and includes the Design & Access Statement;
 - Section 4 considers the prevailing Development Plan context within which the planning application should be considered
 - Section 5 identifies all other material considerations, including the Council's emerging Development Brief for the Site;
 - Section 6 sets out the planning balance and assesses the scheme proposal against the Development Plan, having regard to other relevant material considerations; and
 - Section 7 concludes the case for granting planning permission.

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2. Site Context

The Site and its Surroundings

- 2.1. The site lies immediately adjacent to the east of existing farm caravan store relating to Pool Farm. It comprises an open, broadly level area of agricultural land used for the creation of arable crop associated with the existing farm. An existing landscape bund, planted to enclose the existing caravan store will be removed to enable the seamless connection between that facility and the extension.
- 2.2. Land to the west of the application site comprises an open-air caravan storage site which was granted planning permission (ref:S.19/0087/FUL) in May 2019. The main buildings relating to Pool Farm: Pool Farmhouse (Grade II Listed), a former dairy (which benefits from a Class Q Prior Approval for the creation of three dwellings) and a range of modern grain store buildings is located to the southwest of the site, and beyond that is the Grade II Listed Mayflower Cottage. The northern boundary adjoins Pool Lane which also comprises mature vegetation and two copses. The railway line and embankment forms the eastern boundary. To the south is open agricultural land which is owned and farmed by the applicant for arable crop.
- 2.3. The surrounding environment is predominantly agricultural. However, there are number of elements of infrastructure that have a significant influence on the landscape character in the immediate locality, including: the railway line to the east; M5 to the north; and, Javelin Park EfW incinerator to the west. There are also significant employment buildings at Gloucester 13 and St. Modwen Park Gloucester, both of which are located to the west of the site.

Statutory and Non-Statutory Designations

- 2.4. The Site lies outside of a defined settlement boundary and therefore falls within the 'open countryside'.
- 2.5. The Site is not subject to any specific environmental designations such as Special Protection Area (SPA), Area of Outstanding Natural Beauty (AONB) or Site of Special Scientific Interest (SSSI), nor does it form part of the Green Belt. The north western boundary of the Cotswold AONB follows the alignment of the Colethrop Lane, which links the hamlets of Haresfield and Colethrop, and is some 1.2 kilometres to the south east of the application site.
- 2.6. In flood risk terms, the Site is located within Flood Zone 1, having the lowest probability of flooding. A Flood Risk Assessment accompanies this application and sets out the proposed drainage strategy for the Site.

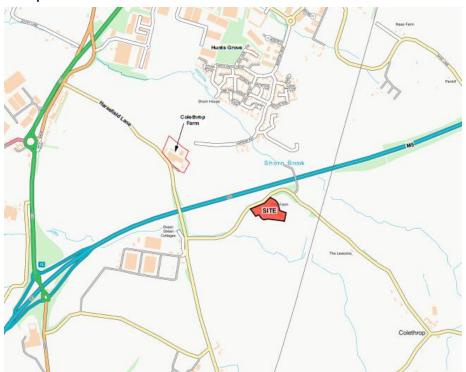
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Planning History

- 2.7. The Site has no planning history.
- 2.8. Land to the west of the application site comprises an open-air caravan storage site which was granted planning permission (ref:S.19/0087/FUL) in May 2019. This business, established by Harefield Farms, previously made temporary use of some of the farm buildings at Colethrop Farm; itself, being located on the opposing side of the M5 to the north. The use of the buildings at Colethrop Farm has to be relinquished in order to enable the delivery residential development associated with Hunts Grove. However, the success of that business is significant, and the latent demand for caravan storage was such that full planning permission was secured for the creation of the permanent facility immediately to the north of Pool Farm, consistent with Stroud Local Plan policies focussing on farm diversification and support for tourism.

Figure 2: Colethrop Farm and Pool Farm



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- 2.9. A planning application for the relocation, reconfiguration and erection of farm buildings to the south of Pool farm is submitted in tandem with this planning application. That proposal involves the relocation of buildings from Colethrop Farm, required to provide storage for high value crop and straw. The buildings will enable crop and straw to be dry-stored in secure conditions and will enable the maintenance of an existing sustainable agricultural business.
- 2.10. The preparation of this application has given due consideration to those proposals. The schemes benefit from the adoption of a comprehensive planning approach to some technical matters: for example, the proposed surface water drainage solution.



The Proposed Development (including Design and Access Statement)

- 3.1. The planning application is made in full and comprises the extension of the existing caravan store to the north of Pool Farm. The proposals include the relocation of the existing earth bund and the removal of two caravan parking spaces to facilitate access to the proposed extension. An additional landscape bund will be erected along the southern extent of the proposed extension.
- 3.2. The description of development proposed is as follows:

'Extension of existing outside storage of unoccupied caravans and motor homes including partial removal of existing landscape bund, the construction of hard-standing and associated drainage and landscaping'.

Design and Access Statement

Use, Amount, Layout, Scale and Design

- 3.3. The proposed extension to the existing caravan store covers an area of 1.09 hectares (just over a 700th of the overall holding) and will provide a further 156 bays in the extension. It will supplement the existing 102 bay caravan store which is already at capacity having opening in 2019. Its southern boundary will be consistent with the southern edge of the existing caravan store, extending east wards to the boundary of the field with the railway line. The caravan store will occupy on the immediate northern part of the wider arable field and will be defined by the existing earth bund that will be extended eastwards.
- 3.4. To facilitate the extension, the landscape bund on the eastern side of the site will be removed, with the material being reused to form landscaping along the southern boundary of the proposed extension. The removal of two existing bays is required to provide access along the northern fringe of the site.
- 3.5. The site will be finished with a permeable but compacted hardcore surface to match the existing store. A French drain will connect to a proposed swale to the south of the site. It has a positive outfall that discharges in to a ditch to the south of the site.

Access and Movement

3.6. Access to the store will utilise the existing caravan store entrance which is located to the north of Pool Farm and leads on to Pool Lane. The main circulation between rows of caravan parking bays is to the northern fringe of the site. Sufficient spaces between parking bays to enable vehicular parking and turning within the site without conflict.

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Sustainable Drainage

3.7. It is proposed that surface water conveyance and retention would be provided by a combination of piped drainage system, swales and an attenuation. The attenuation ponds (in the southern part of the Site) would be provided to accommodate the greenfield run off rates for a 1 in 100 year rainfall event (including 40% climate change factor). This feature would also control the surface run-off from the existing site which is unregulated before discharging into a drainage ditch to the south. Overall, the proposals are deemed to result in betterment over the existing drainage situation. Full details of the proposed drainage solution are contained within the Flood Risk Assessment and Drainage Strategy prepared by Clive Onions.

Landscaping

3.8. The proposals will include enhancement landscape planting along the newly created southern border of the site, consistent with the existing feature surrounding the current caravan store. This would largely screen the site from general more distant views.

Biodiversity

3.9. An extended Phase 1 habitat survey and associated report has been prepared by BSG Ecology and is submitted in support of this application. It identifies that the site is of low ecological value. The report suggests a series of recommendations including providing enhancements around the parameters of the proposed planting mix along the proposed landscape bund which will enclose the site.

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4. The Development Plan

- 4.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 directs Local Planning Authorities to determine planning applications in accordance with the policies of the Development Plan unless material considerations indicate otherwise. Section 38(3) of the Act provides that the Development Plan includes the "development plan documents (taken as a whole) which have been adopted or approved in relation to that area". The adopted statutory Development Plan for Stroud District Council comprises:
 - The Stroud Local Plan (adopted November 2015);
- 4.2. Material considerations also include national policy, which is primarily expressed through the National Planning Policy Framework and national Planning Practice Guidance, the Council's emerging Development Plan, as well as additional guidance produced by the Council in the form of Supplementary Planning Documents (SPDs). These are considered further at Section 5.

The Adopted Development Plan

The Stroud Local Plan

- 4.3. The Stroud District Local Plan (LP) was adopted in November 2015 to guide development across the District until 2031. It sets out the overarching spatial strategy and housing requirements for the District for the plan period. This section of the report summarises those policies relevant to the proposed development.
- 4.4. A principal objective (SO2) of the LP is the for development over the plan period to provide a strong, diverse, vibrant local economy that enables balanced economic growth, coupled with enhance job opportunities across the District.
- 4.5. Core Policy CP15 directly relates to development proposals in and associated with the working countryside. The Policy is split in to two parts: first, the principle of development; and second, if the first step is met, the specific measures that the development should then demonstrate compliance with.
- 4.6. First, in order to protect the separate identity of settlements and the quality of the countryside (including its built and natural heritage), this Policy requires proposals outside of identified settlement development limits to comply with only one of a series of criteria in order to be acceptable in principle. The only criteria which the development should demonstrate compliance with, therefore, is whether the proposal is "essential to be located there in order to promote public enjoyment of the countryside and support the rural economy through employment, sport, leisure and tourism".
- 4.7. If the above principle can be met, the Policy requires development to demonstrate that it would:
 - i) Not result in an adverse impact on heritage assets and their setting;
 - ii) Not lead to excessive encroachment or expansion of development away from the original buildings;

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- iii) In the case of proposals to re-uses an existing building or buildings, these are appropriately located and capable and worthy of conversion. Any such conversion will involve a building that positively contributes to an established local character and sense of place. In the case of replacement buildings they must bring about environmental improvement.
- 4.8. Linked to the principle of development, Policy EI5 provides guidance in relation to farm enterprises and diversification. It expressly states that development which forms part of a farm diversification scheme will be permitted where the proposals can demonstrate the viability of farming through helping to support, rather than replace or prejudice, farming activities on the rest of the farm and promotes the use of farming practices that have a positive impact on the environment. Where this can be achieved, the Policy requires development proposals to comply with the following criteria:
 - 1) The proposed development will stimulate new economic activity with a use compatible with its location, which maintains the relative sustainability of a rural area
 - 2) Any new buildings are appropriate in scale, form, impact, character and siting to their rural location
 - 3) Wherever possible new or replacement buildings should be located within or adjoining an existing group of buildings
 - 4) The proposed development will not generate traffic of a type inappropriate for the rural road affected by the proposal, or require improvements or alterations to these roads which would be detrimental to their character.
- 4.9. Policy EI10 sets out support for new tourism opportunities, but with the focus of the policy being on attractions and tourism accommodation.
- 4.10. Policy CP14 sets out its support for development that is high quality and seeks to protect, conserve and enhance the built and natural environment. The Policy sets out a series of criteria that development should met in order to comply with, including:
 - 1. Sustainable construction techniques, including facilities for the recycling of water and waste, measures to minimise energy use and maximise renewable energy production
 - No unacceptable levels of air, noise, water, light or soil pollution or exposure to unacceptable risk from
 existing or potential sources of pollution. Improvements to soil and water quality will be sought through
 the remediation of land contamination, the provision of SuDS and the inclusion of measures to help
 waterbodies to meet good ecological status
 - 3. Adequate water supply, foul drainage and sewage capacity to serve the development and satisfactory provision of other utilities, transport and community infrastructure
 - 4. No increased risk of flooding on or off the site, and inclusion of measures to reduce the causes and impacts of flooding as a consequence of that development
 - 5. An appropriate design and appearance, which is respectful of the surroundings, including the local topography, built environment and heritage
 - 6. Re-use of previously developed land and/or the adaptation of existing buildings that make a positive contribution to the character of the site and surroundings, unless demonstrably unviable

7. No unacceptable adverse affect on the amenities of neighbouring occupants

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- 8. Contribute to the retention and enhancement of important landscape & geological features, biodiversity interests (including Our environment and surroundings trees, hedgerows and other natural features)
- 9. Contribute to a sense of place both in the buildings and spaces themselves and in the way in which they integrate with their surroundings including appropriate landscaping, biodiversity enhancement, open space and amenity space
- A design and layout that aims to assist crime prevention and community safety, without compromising other design principles
- 11. Efficiency in terms of land use, achieving higher development densities in locations that are more accessible by public transport and other non-car modes and where higher densities are compatible with the character of the area and the setting of the development
- 12. It is not prejudicial to the development of a larger area in a comprehensive manner
- 13. Safe, convenient and attractive accesses on foot and by cycle and suitable connections with existing footways, bridleway, cycleways, local facilities and public transport
- 14. It is at a location that is near to essential services and good transport links to services by means other than motor car.
- 4.11. Policy ES3 requires development proposals to maintaining quality of life within environmental limits. Planning permission will not be granted to any development which would be likely to lead to, or result in an unacceptable level of:
 - 1. Noise, general disturbance, smells, fumes, loss of daylight or sunlight, loss of privacy or an overbearing effect
 - 2. Environmental pollution to water, land or air and an unacceptable risk to the quality and quantity of a water body or water bodies
 - 3. Noise sensitive development in locations where it would be subject to unacceptable noise levels
 - 4. Increased risk of flooding on or off the site, and no inclusion of measures to reduce the causes and impacts of flooding
 - 5. A detrimental impact on highway safety
 - 6. An adverse effect on contaminated land where there is a risk to human health or the environment.
- 4.12. Policy ES6 provides guidance on biodiversity and geodiversity.
- 4.13. Policy ES7 provided guidance in relation to landscape character and a proposals impact upon it. This Policy requires development proposals to conserve or enhance the special features and diversity of the different landscape types found within the District. Development will be permitted where the location, materials, scale and use are sympathetic and complement the landscape character; and, natural features including trees, hedgerows and water features that contribute to the landscape character and setting of the development should be both retained and managed appropriately in the future.
- 4.14. Policy ES8 provides guidance in relation to trees, hedgerows and woodlands. It advises that development that would result in the unacceptable loss of these features would not be permission. Where loss of trees

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is acceptable, adequate replacement provision will be required that utilise species that are in sympathy with the character of the existing tree species in the locality and the site.

- 4.15. Policy El12 requires the promotion of transport choice and accessibility, and requires all development proposals should have full regard to the transport impact on the local highway network.
- 4.16. Policy ES10 provides guidance in relation to the historic environment and assets This policy requires historic development to be preserved, protected and enhanced.
- 4.17. In accordance with Policy ES12, the District Council will require the layout and design of new development to, among other criteria, create well designed and high quality successful places.
- 4.18. New development should be designed to offer flexibility for future needs and uses taking into account other changes, and it must be based on thorough site appraisal and be sensitive to its context. 'Design Quality', reflecting a thorough understanding of the site context, must be demonstrated as part of any proposal. The Council will require the submission of a Design and Access Statement which clearly demonstrates the design and suitability of the proposal in its local context.



Other Material Considerations

- 5.1. Section 70(2) of the Town and Country Planning Act 1990 (as amended) requires that all material considerations are taken into account in decision-making. The following material considerations are relevant to this planning application and are considered in turn below:
 - National policy contained within the National Planning Policy Framework ('the Framework') (February 2019).
 - Supplementary Planning Documents
 - Community Infrastructure Levy (April 2017)
 - Emerging Stroud Local Plan Review

The National Planning Policy Framework

- 5.2. The revised National Planning Policy Framework ('the Framework') was published in July 2018 and amended in February 2019. The revised Framework set out the Government's policies for the planning system and maintains that a presumption in favour of sustainable development remains at the heart of the Framework (paragraph 10).
- 5.3. The Framework makes clear that the purpose of the planning system is to contribute to the achievement of sustainable development which has the following mutually supportive and interdependent objectives:
 - "an economic objective to help build a strong, responsive and competitive economy, by ensuring
 that sufficient land of the right types is available in the right places and at the right time to support
 growth, innovation and improved productivity; and by identifying and coordinating the provision of
 infrastructure;
 - a social objective 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; and
 - an environmental objective to contribute to protecting and enhancing our 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 and adapting to climate change, including moving to a low carbon economy." (para. 8, the Framework) [our emphasis].
- 5.4. The presumption in favour of sustainable development is set out at paragraph 11. For decision taking, the injunction remains to approve proposals which accord with an up to date Development Plan without delay (para. 11c). Where there are no development plan policies, or those policies most important for

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determination the application are out of date, the proposal should be approved unless one of two exceptions applies (para. 11d), these being:

- (i) when the policies in the Framework that protect areas or assets of particular importance provide a clear reason for refusing the development proposed (with reference to Footnote 6); or
- (ii) when the adverse impacts would significantly and demonstrably outweigh the benefits, when assessed against the Framework policies when taken as a whole.

"Decision-taking"

5.5. In addition the Framework, at paragraph 38, requires LPAs to "...approach decisions on proposed development in a positive and creative way" and "...seek to approve applications for sustainable development where possible".

"Building a strong, competitive economy"

- 5.6. Chapter 6 reaffirms the Government's commitment to securing economic growth (para. 80), taking into account both local business needs and wider opportunities for development. Planning policies must be "flexible enough to accommodate needs not anticipated in the plan" and respond rapidly to economic changes (para. 81d).
- 5.7. Paragraph 82 states that planning policies and decisions should recognise and address the specific locational requirements of different sectors.
- 5.8. Paragraph 83 contains the Government's approach on supporting the rural economy and ensuring that it remains prosperous. It directs planning policies to enable sustainable growth and expansion of all types of business in rural areas, both through the conversion of existing buildings and well-designed new ones (para.83.a); the development and diversification of agricultural and other land-based rural businesses (para.83.b); and sustainable rural tourism and leisure developments which respect the character of the countryside (para.83.c).
- 5.9. Decisions concerning rural development should recognise that sites to meet local business and community needs in rural areas may not 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. The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.

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"Making effective use of land"

5.10. Paragraph 117 of the Framework encourages decisions to "...promote an effective use of land in meeting the need for home and other uses...".

"Achieving well-designed places"

5.11. The Framework recognises that good design is a key aspect of sustainable development, and "the creation of high quality buildings and places is fundamental to what the planning and development process should achieve" (para. 124), with further design guidance set out at paragraphs 125 to 132 with decisions requiring developments to be visually attractive as a result of good architecture, layout and appropriate and effective landscaping (para. 127.b); and that is sympathetic to local character and history, including the surrounding built environment and landscape setting (para.127.c).

"Meeting the challenge of climate change, flooding and coastal change"

5.12. The Framework seeks to avoid inappropriate development in areas at risk of flooding and direct development to areas with the lowest risk of flooding. As the accompanying FRA confirms, the Site lies within flood zone 1, thereby being at the lowest risk of flooding. The application proposal would not give rise to any flooding or drainage capacity issues.

"Conserving and enhancing the Natural Environment"

5.13. Paragraph 170 requires decision takers to protect and enhance valued landscapes, minimise impacts on biodiversity and provide new opportunities for biodiversity, having regard to mitigation and compensation measures.

"Conserving and enhancing the Historic Environment"

- 5.14. Paragraph 189 of the Framework requires applicants to assess the significance of any heritage assets affected by a development proposal. When considering the impact of a proposed development on the significance of a designated heritage asset, paragraph 193 requires great weight to be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial herm to its significance.
- 5.15. Where the development would lead to less than substantial harm to the significance of the heritage asset, this harm should be weighed against the public benefits of the proposal (para. 196)

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Supplementary Planning Documents

5.16. There are no Supplementary Planning Documents relevant to the proposals.

The Council's Community Infrastructure Levy (CIL)

5.17. The Council's CIL Charging Schedule was implemented in April 2017 and is charged on new developments in the area. It does not apply to new agricultural development.

The Emerging Development Plan

5.18. The Stroud Local Plan is presently undergoing review. However, it is only at an early stage in the plan making process and therefore draft policies in the emerging Local Plan are deemed to carry limited weight. Accordingly, the development is not therefore assessed against policies in the emerging Local Plan.

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6. The Planning Assessment

- 6.1. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 provides that all decisions must be determined in accordance with the Development Plan, when taken as a whole, unless other material considerations indicate otherwise. Section 39 of the Act requires decision makers to exercise their functions with the objective of contributing to the achievement of sustainable development. The Development Plan is described at Section 4 of this Statement. Further material considerations exist in the form of the Framework and the Council's supplementary planning guidance, as described at Section 5.
- 6.2. This Section of the Statement identifies the adopted planning policy framework applicable to the proposed development. This section assesses the proposals compliance with the policy context, and the acceptability of the application detail. It covers the following matters:
 - Compliance with to the Development Plan
 - Assessing Impact
 - Benefits of the Proposed Development
 - The Overall Planning Balance.

Compliance with the Development Plan

- 6.3. The Development Plan is up-to-date in respect of Policies that are relevant to the determination of planning applications for rural based development. In this regard, proposals are required to demonstrate that they are essential to be located there (at the site) in order to promote the public enjoyment of the countryside and support the rural economy through, among others sectors, leisure and tourism, in line with Policy CP15(2) of the Local Plan.
- 6.4. The use of the land to the north of Pool Farm for an open-air caravan storage site has been established through the grant of planning permission for a 102 bay site under the same planning policy regime. Since the implementation of that planning permission in 2019, the requirement for caravan storage has increased and there is a growing waiting list for storage bays. This trend has been accelerated by the Covid-19 pandemic, with people preferring to invest in caravans/motor homes and to go on staycasions rather than holiday abroad. Indeed, all the trends point towards UK tourists choosing to stay within the country for their future holidays¹.
- 6.5. The principle of a caravan store in this location has been accepted. As the existing facility is at capacity and there is demand for additional storage bays, the provision of such a facility is essential in this location (for reasons of tie in with the existing facility and its overall management) rather than elsewhere within the applicant's holding. The land to be changed to caravan storage represents less than one 700th of the applicant's total land holding, and the revenue generated from the caravan store will be reinvested back in

1 https://www.schofields.ltd.uk/blog/5980/staycations-uk-travel-2020-21/

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to Haresfield Farms, demonstrating that the proposals will supplement the core agricultural business which is the growth of high value arable crops.

6.6. The proposals are essential and are compliant with the principles enshrined in Policies CP15 and EI5 of the Local Plan.

Design, Layout and relationship with Heritage Assets

- 6.7. Careful consideration has been given to the site and its surroundings in designing an appropriate layout and location of the proposed extension so not to encroach on principal element of the field which lies to the south. The proposals ensure that the development, circulation, materials and landscaping tie in with the existing caravan store.
- 6.8. The nearest heritage assets are Pool Farm and Mayflower Lodge, both of which are Grade II Listed. The proposal, an extension to the existing caravan store, extends the storage provision east, away from the heritage assets. Views of the heritage asserts in view of the development will be limited due to landscaping and existing agricultural buildings. The proposals will therefore have no impact on the setting of these buildings, and as per the approval of the existing caravan store, the development is considered to have an appropriate relationship with these heritage assets.

Access and Highways

- 6.9. Access to the proposed caravan extension will utilise the existing entrance to the caravan store which lies to the west and leads on to Pool Lane. The access to the caravan store has been delivered in accordance with required visibility splay reflective of the road speeds on Pool Lane in the earlier permission. The proposals will not alter the existing arrangement.
- 6.10. The number of vehicle movements associated with the development is likely to be limited and seasonal depending on owners holidaying patterns. Experience of the existing caravan store demonstrates that there is no one 'peak day' in the week for drop off or collection of caravans. It is anticipated that the same ad hoc and low impact pattern will pertain to the usage of the extension to the caravan store.
- 6.11. The majority of vehicle movements to and from the site already use junction 12 of the M5, avoiding traffic from entering surrounding villages. A significant proportion of transport movements for the proposed extension are likely to follow this same pattern.
- 6.12. The proposals therefore comply with the requirements of Policies CP15 (i,ii&iii) and EI5(2,3&4) of the Local Plan.

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Flood Risk and Drainage

- 6.13. The proposals are supported by a flood risk assessment and a comprehensive drainage strategy. The FRA sets out the fact that surface water presently percolates in to the ground with no formal control. The proposals include the potential to connect into an attenuation pond (which is being promoted as part of an a planning application for new farm buildings at Pool Farm, and is submitted in tandem with this application) which is designed to a sufficient size to accommodate surface water run-off from the proposed farm buildings and the caravan store to the north of Pool Farm. Overall, the drainage scheme would result in run off rates from the site which are controlled at a slower rate that the existing arrangement, demonstrating betterment.
- 6.14. The earth works arising from the creation of the attenuation pond as well as the removal of the existing eastern bund enclosing the current caravan store will be redistributed an shaped in to a new landscape bund along the southern edge of the caravan store.

Landscape Considerations

6.15. The proposals include the provision of additional landscaping along the southern boundary of the proposed access road, providing an enhanced setting for the adjacent Grade II Listed Mayflower Cottage.

Biodiversity

6.16. A Preliminary Ecological Appraisal prepared by BSG confirms that the land to which the proposals relates is used for the creation of arable crop and has limited ecological value. The site is also topped regularly and provides limited habitat for protected species.

Summary

- 6.17. The Framework policies on the delivery of sustainable development carry significant weight, and specific policies do not indicate that development as proposed at the Site should be restricted.
- 6.18. There are no technical or environmental impacts that would significantly or demonstrably outweigh the benefits of the proposal.
- 6.19. In accordance with paragraph 11 of the Framework, the development proposal clearly constitutes 'sustainable development'. Accordingly, it is clear there are significant material considerations which outweigh the statutory presumption in favour of the Development Plan. It is respectfully requested the application is approved without delay.

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7. Summary and Conclusions

- 7.1. This Planning Statement supports a full planning application, submitted to Stroud District Council for an extension to the existing caravan store facility to the north of Pool Farm, Haresfield ('the Site'). The development comprises the creation of a further 156 bays on land extending to 1.09 hectares (which just over a 700th of the applicant's overall holding). The proposed development will be accessed/egressed via the existing entrance to the site, which was established via the latest planning permission, and connects on to Pool Lane. The proposals also include an additional landscape bund along the southern edge of the Site and is consistent with the existing caravan store.
- 7.2. Adopted Development Plan policies support tourism based development where it is located in the correct place. Through the grant of planning permission for the existing extension, the Council has accepted that the proposed use of the land for a caravan store is acceptable and compliant with relevant Planning Policies in the Development Plan. The existing facility is at capacity and there is a waiting list for further caravan storage bays. This reflects the increasing trend for staycasions which has been accelerated by the Covid-19 pandemic. Furthermore, the development is acceptable as a means of diversifying existing farming practices and would not prejudice the primary function of the agricultural holding: the growing of high value arable crops.
- 7.3. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the proposed development is in accordance with Policies in the adopted Development Plan. The planning application is supported by a suite of technical reports which demonstrate that the proposals can be delivered without any material adverse effects arising from the development.
- 7.4. As Section 6 explains, there are no technical or environmental impacts that would significantly or demonstrably outweigh the substantial benefits of the proposal. In accordance with paragraph 11 of the Framework, the development proposal clearly constitutes 'sustainable development'. The development is therefore essential to maintain the operational, functional and economic sustainability of this agricultural enterprise and should benefit from the presumption in favour of sustainable development, as set out in the NPPF.

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Appendix 1 – Site Location Plan

