

Portal ref: PP-12669877  
Maze ref: 218-05

West Lancashire Borough Council  
Planning Services  
Via Planning Portal



08 April 2024

Dear Sirs

Four Season Glamping  
Leisure Lakes, Mere Brow, Tarleton, Preston, PR4 6JX

Retrospective application for approval of seven holiday letting units, footbridge access to island and siting of a warden's caravan and shipping container storage unit

1. I am pleased to provide information to enable the Borough Council as Local Planning Authority to consider development that has been undertaken at the Leisure Lakes site without the benefit of planning permission.
2. The application is made on behalf of the tenant operator, Four Season Glamping Pods Limited ('the applicant').
3. The development has created seven glamping units on a small island within the west lake at the Leisure Lakes holiday and leisure site. The pods are the applicant's own bespoke design and many incorporate salvaged elements and reclaimed materials to create unique accommodation units for short term holiday lets.

## Application documents

4. Application documents submitted for consideration by the Council are listed in Annex A. A comprehensive package of supporting material is provided to ensure the Council and consultees have full information about the development and its interactions with local woodland, ecology, and drainage considerations that arise on the Leisure Lakes site.
5. This letter is the Applicant's Planning Statement. It provides a non-technical overview of the planning application package and explains the main planning policy considerations material to the Council's assessment of the retrospective request for planning permission to be granted.

## Application fee

6. The application fee of £4,046.00 is calculated based upon the creation of 417m<sup>2</sup> of accommodation on a site area of 0.22ha. Payment has been made via Planning Portal.

## The application site

7. Leisure Lakes is an established tourist destination in West Lancashire, situated just south of the A565 Preston to Southport road, at Mere Brow. The site is a former gravel workings, reclaimed to accommodate a broad range of outdoor sport and leisure activities on lakes, in woodland areas and fields.
8. Leisure Lakes has facilities for camping and caravanning, walking, cycling, fishing, equestrian, golf, football, jet-ski and jet-boat activities and is supported by cafes, a pub, play barn, outdoor children's play area, and specialist retail outlets catering for bikes and golf. The site also hosts transitory events and activities throughout the year, such as car boot sales and motocross meetings. Collectively these facilities and activities make a significant contribution to the rural economy and to the Borough's tourism offer.
9. The Leisure Lakes site as whole covers an area of about 121 hectares (300 acres), stretching from the A565 Southport New Road at its north end, down to the River Crossens in the south. End-to-end the site is about 1.5km (1 mile) in length.
10. The area for by this application is just 0.22ha composed of a small island in the west lake and the immediately adjoining lake fringe where the glamping pods have been constructed and supporting infrastructure sited.
11. Leisure Lakes and the area surrounding it is predominantly of rural character. Beyond Leisure Lakes, to the northwest is the Riverside Caravan Park and a dwelling and associated kennels and cattery (Richmond Hill). The village of Mere Brow is situated immediately northeast of the site and includes a school, pub and other small scale local services. The site's west boundary is defined by the Tarleton Runner, a locally important land drainage watercourse. The southern boundary is formed by the River Crossens, and the east boundary by a further land drainage channel.
12. Mere Meanygate, which is Leisure Lakes' access road and a public right of way, passes through the central part of the Leisure Lakes site from the access at Mere Brown, running northeast to southwest. The A565 Southport New Road lies 120 metres from the access to Leisure Lakes. Near the site the A565 is a major dual carriageway route connecting Southport (5 miles southwest) with Preston, via the A59 (10 miles northeast).

## Planning history

13. Leisure Lakes has a lengthy and quite complex planning history. The site that exists today is the result of historic commercial extraction of sand and gravel resources, and the subsequent reclamation of the land for outdoor sport and leisure activities, together with the effects of time that have allowed a range of different natural and human influenced habitats to emerge.

14. Recent relevant planning history is summarised below:

- 2017/0756/OUT, outline planning permission granted on 11 July 2018, approving a masterplan scheme for modernisation of the accommodation offering at the site. The masterplan provides a long-term vision for transformation of Leisure Lakes from a touring caravan and camp site to one hosting more permanent holiday accommodation in a mix of lodges and static caravans, together with the cessation of noisier motorised sporting activities and commencement of positive management of habitats in the site for the benefit of biodiversity.
- 2020/0386/FUL approved a revised masterplan scheme on 8 September 2020, amending the type of accommodation for the first phase of planned development (Zone 4) from lodges to static caravans. A copy of the approved masterplan drawing 11302-L02-P04 is contained in Annex B. It remains the presently approved scheme.
- 2020/0801/ARM provides reserved matters approval for the Zone 4 static caravan scheme, issued on 01 September 2021
- 2020/0802/CON approved details reserved by condition on the September 2020 masterplan necessary to enable the Zone 4 development to proceed.

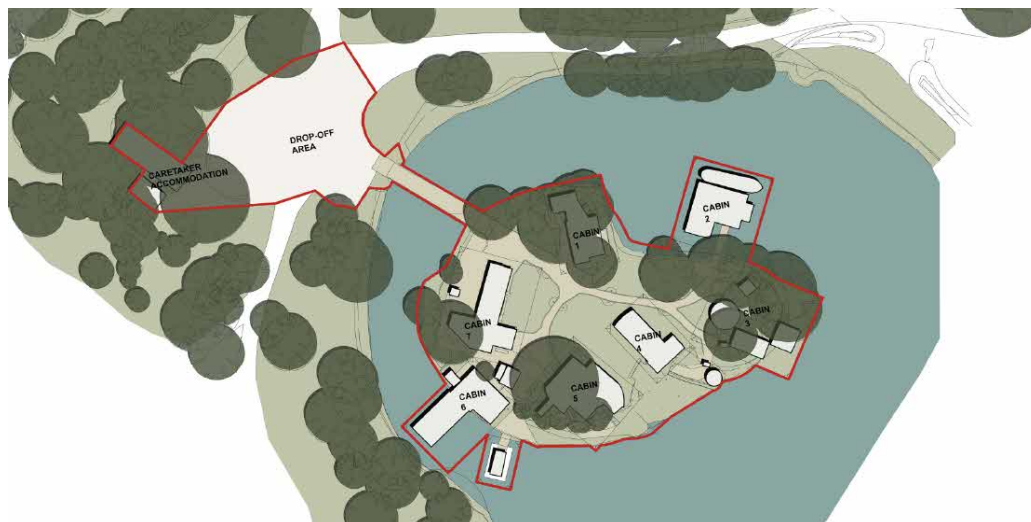
15. The Zone 4 static caravan development has been commenced. All main groundworks to revise site levels and install drainage infrastructure has been completed. Some work remains to do on surface finishes to demarcate the static caravan pitches and finalise the installation of power supply, roadway and footpath surfaces.

## The development

16. The applicant seeks the Council's retrospective approval to existing development, which is recorded on the accompanying plans, drawings and photographic studies:

- Seven unique glamping units constructed on an island site within the west lake.
- Guest drop-off area
- Site warden's static caravan and storage container in woodland, off the island

Figure 2 – The glamping island development



17. The applicant also seeks the Council's approval to proposed drainage arrangements for the development, composed of:
  - Clean surface water draining to the lake.
  - New foul drainage infrastructure to connect the development with the site's existing central pumping station and from there to the public sewer in Mere Brow.
18. The development has created about 417 square metres gross floorspace of purpose-built accommodation for short-term holiday letting on the fringes of the island, together with private outdoor amenity spaces serving each unit and a common amenity space in the centre of the island. A schedule of accommodation is provided in the planning application documents.
19. The island is connected to the land by a pedestrian bridge installed several years ago providing a connection between the guest drop-off area and the accommodation units.
20. The applicant has sited a static caravan and shipping container in woodland adjacent to the drop-off area. The caravan provides sleeping and administrative accommodation for the site warden and the shipping container stores maintenance and cleaning equipment and other essential supplies to enable the accommodation units to be serviced for guests.

## Pre-application advice

21. A breach of planning control involving construction of the glamping units was acknowledged following investigation by West Lancashire Borough Council's planning team and a site meeting attended by a planning enforcement officer, the applicant and Maze Planning on 13 September 2023.
22. The applicant agreed to prepare this application to enable the Council to consider a request from for retrospective planning permission to be granted.
23. The local planning authority has not provided any additional pre-application advice beyond the need for a retrospective application and its general scope. The detailed content of the application and associated supporting material has been settled by the applicant and the advising development team, drawing on previous knowledge of the Leisure Lakes site gained whilst working on the approved masterplan scheme and the Zone 4 static caravan development phase.
24. The applicant has remained in touch with the local planning authority whilst this planning application has been prepared to keep officers informed of progress.

## Drawings and other supporting information

### Plans and drawings

25. Details of the development have been captured by a topographical and elevations survey, with further details added by the project architect to ensure legibility.

### Photographic surveys

26. A photographic survey is provided for each unit of accommodation capturing additional further details about the form of development and external materials used.

### Drainage strategy and design

27. Drainage at the development is not fully resolved. The strategy explains the proposal to continue directing clean roof water to the lake and to install a new foul drainage connection to the existing system on the Leisure Lakes site which discharges to the main sewer in Mere Brow via a pumped rising main. A proposed drainage plan is provided.

### Ecology report

28. Specialist consultancy Urban Green has provided a Preliminary Ecological Appraisal. It has identified habitats on the application site with a particular focus on the potential presence of protected or notable species and provides specific recommendations for mitigation to help minimise potential impacts on ecology.
29. The application site is located within the Mere Brow Biological Heritage Site which contains priority habitats and habitats that are important for waterbirds.
30. The report concludes that any impacts resulting from the development will have been minor, because the development has a small footprint and is sited within extensive habitats. The main habitat loss to have occurred has been grassland on the island where glamping pods and their curtilages have been constructed. This may previously have provided suitable resting ground for a wide range of birds associated with the wider Leisure Lakes site.
31. Most trees present on the island have been retained and are in acceptable condition to survive into the future.
32. There is no necessity for further ecology surveys to understand the impact of the development.
33. The recommended ecological enhancements set out in the report are:
  - Following a sensitive landscape management regime
  - Use of sensitive lighting
  - Installation of bird, bat and hedgehog housing boxes
  - Installation of hibernacula and dead wood / brash piles
34. The recommended ecological enhancement complement and are consistent with the site-wide Habitat Creation Maintenance and Management Plan (HCMMP) approved as part of the Leisure Lakes masterplan plan scheme.

## Tree report

35. The report concludes that glamping pod development has been undertaken in a sympathetic manner with regards to existing retained trees on the site.
36. It notes there are instances of a constrained spatial relationship between the development and trees, but straightforward measures can be taken to manage that in the future and ensure the long-term sustainability and health of the trees.
37. The report advises removal of a small number of Silver Birch that are in poor health and felling of one potentially dangerous semi-mature Oak with structural damage not caused by the glamping pod development.

## What are the main planning issues?

38. Leisure Lakes is a long-established leisure site. It lies wholly within the Green Belt and large parts of the site are also within a Biological Heritage Site (BHS), a local wildlife designation made by Lancashire County Council. Some woodland areas on the site are covered by Tree Preservation Order.
39. These land use planning designations and tree safeguards provide the context for assessing acceptability of the glamping development that has taken place.
40. The site's planning history is also relevant. The glamping units have been constructed within an area of the Leisure Lakes site where the approved September 2020 masterplan shows development of holiday accommodation lodges within woodland areas and on the lake shore, as shown in Figure 2 below.

Figure 2 - Approved masterplan extract



41. The glamping development that has taken place is additional to the already approved holiday accommodation outlined in the Masterplan for Leisure Lakes. The masterplan does not propose any development on the island and the siting of future holiday accommodation units envisaged in the masterplan (Figure 2) are indicative. Siting is a reserved matter covered by condition 3 of planning permission 2017/0756/OUT. The masterplan development and glamping units are physically and functionally compatible.
42. Annex C contains a planning policy assessment, examining the glamping development's fit with policies in the West Lancashire Local Plan and government policy in the National Planning Policy Framework. The policy assessment was initially produced in connection with the masterplan development in 2017 and has been updated for this planning application.
43. The Assessment concludes that:
- The existence of Leisure Lakes as an established tourism and leisure facility is a significant consideration.
  - The 2020 approved Masterplan provides a structure for rejuvenation and modernisation of the Leisure Lakes complex to one providing tourism facilities relevant to contemporary holiday and leisure demand. The glamping development is consistent with that planning-supported transformation.
  - Most other locations in West Lancashire Borough where rural tourism development might be considered would be situated in Green Belt with commensurate policy constraints, but lacking the established holiday and leisure infrastructure which is a feature of the application site.
  - Very special circumstances exist for allowing the glamping development to remain as a complementary addition to the range of existing holiday and leisure accommodation on the site, and to that contained in the approved masterplan. The minimal identified harm to the Green Belt arising from the inappropriate development of glamping accommodation is clearly outweighed by the planning policy objective of providing a response to a weak tourism economy (policy EC2) and the long-term gains for woodland, ecology and bio-diversity that are enabled by the commercial, income generating elements of site development.
44. We are not aware of any other substantive material considerations, so the overall planning balance is considered to favour the grant of planning permission.

## Concluding summary

45. Formulation of the Masterplan development scheme for Leisure Lakes was a lengthy and engaging process, spanning several years. The transformation process has commenced with development of static caravan pitches within masterplan Zone 4 to be concluded during 2024 and supported by other changes on the site to prepare for development commencement of other zones.

46. The glamping units are additional to the masterplan development but wholly complementary. The development is small-scale and has taken place on a self-contained island which the masterplan had no proposals for.
47. The glamping units provide unique contemporary short-term holiday accommodation, different to the woodland lodges and static caravans that will be developed elsewhere on the Leisure Lakes site. In that way, the development contributes to a mix of accommodation types on the site to help create abroad appeal to visitors.
48. There is good demand for the glamping accommodation. It generates rental income for Leisure Lakes at an important time of transformation when other longstanding income streams are coming to an end of necessity to make land available for the masterplan development works, which require significant capital outlay.
49. The Masterplan and complementary glamping take the existing Leisure Lakes site and breathe new life into it, creating a contemporary holiday resort with a mix of accommodation in woodland, lakeside and floating lodges and static caravans, focussed on the established core of the site.
50. The glamping units have no impact on the masterplan development and embrace the principles and obligations of the masterplan relating to the creation and management of woodland to optimise biodiversity conditions, whilst providing opportunities for quiet enjoyment of the countryside and lakes.
51. The development that has been undertaken is compliant with the National Planning Policy Framework and applicable policies from the Council's Local Plan which support the existing of sustainable facilities for tourism business.
52. The application is commended to the Local Planning Authority and the advisory team is available to officers, consultees and the local community to respond to any queries.
53. If any further details are required to aid consideration of the application, please let me know and I will ensure the team provides a timely response.

Yours faithfully



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# Annex A

## Planning Application Documents

### Forms and notices

Application form	Full planning permission
Notice B	Applicant is a tenant

### Application fee

Full planning permission for accommodation of 417m2 gross	£4,046.00 + Portal service charge

### Plans and drawings

Drawing number	Drawing title
2292-UG-DR-UD-1001 P01	Location Plan
2292-UG-DR-UD-1102 P01	Proposed Site Plan
2292-UG-DR—UD-1103 P02	Proposed Site Plan Topographical Overlay
1322-1.02 Rev.A	Unit 1 Existing elevations
1322-2.02 Rev.A	Unit 2 Existing elevations
1322-3.02 Rev.A	Unit 3 Existing elevations
1322-4.02 Rev.A	Unit 4 Existing elevations
1322-5.02 Rev.A	Unit 5 Existing elevations
1322-6.02 Rev.A	Unit 6 Existing elevations
1322-7.02 Rev.A	Unit 7 Existing elevations
1322-0.01 Rev.A	Schedule of areas
2024-066-001	Proposed drainage layout
S23747-DR01	Topographical survey

### Photographic surveys

Drawing number	Drawing title
1322-0.01	Bridge Link
1322-1.01 Rev A	Unit 1
1322-2.01 Rev A	Unit 2
1322-3.01 Rev A	Unit 3
1322-4.01 Rev A	Unit 4
1322-5.01 Rev A	Unit 5
1322-6.01 Rev A	Unit 6
1322-7.01 Rev A	Unit 7

# Reports and Statements

Document title	Author
Flood Risk Assessment and Drainage Strategy 2024-066, April 2024	Graham Schofield Associates
Preliminary Ecological Appraisal UG2292 rev.02, March 2024	Urban Green
Planning Statement April 2024 (218-05)	MAZE Planning Solutions
Arboricultural Impact Assessment (AIA) UG2292, December 2023	Urban Green

## Annex B

Approved Masterplan drawing 11302-L02-P04  
Planning permission ref. 2020/0386/FUL



**KEY**

- APPLICATION SITE BOUNDARY
- LAND COVER:**
- BUILDINGS
- ROADS
- WATER BODIES
- GRASSLANDS
- EXISTING VEGETATION
- PROPOSED VEGETATION

**Outline Accomodation Schedule**

1. Floating Holiday Homes	33
2. Woodland Holiday Homes	75
3. Static Caravans	278
<b>Total</b>	<b>386</b>



Project:	Leisure Lakes	Notes:-	Designed By: MS	Checked By: AT	Approved: MK	Scale@ A1: 1:2500	<small>Do not scale this drawing (printed or electronic version). Contractors must check all dimensions from site. This drawing is copyright and is for use on this site only. This drawing should be read in conjunction with all relevant consultants drawings and specialist subcontractors / supply chain drawings and specifications. All works to be carried out in accordance with the latest British Standards / Codes of Practice unless specifically directed otherwise in the specification. Responsibility for the reproduction of this drawing in paper form, or issued in electronic format, lies with the recipient to check that all information has been replicated in full and is correct when compared to the original paper or electronic image. Graphical representations of equipment on this drawing have been co-ordinated, but are approximations only. Please refer to the specifications and / or details for actual sizes and / or specific contractor construction information.</small>
Title:	Illustrative Masterplan		Drawing No: 11302_L02	Date: 17/07/17	Client: Leisure Lakes	Revision: P04	

# Annex C

## Planning Policy Assessment

Portal ref: PP-12669877  
Maze ref: 218-05



**maze**  
PLANNING  
SOLUTIONS

Retrospective planning application  
Glamping pods and related development at  
Leisure Lakes, Mere Brow, Preston PR4 6JX

# Planning Policy Assessment

April 2024

## 1.0 Context

- 1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
- 1.2 The Leisure Lakes site, including the glamping units constructed by Four Seasons, lies wholly within the statutory Green Belt. Large areas are also within a Biological Heritage Site (BHS), a local wildlife designation made by Lancashire County Council.
- 1.3 Some woodland areas are also covered by a Tree Preservation Order (TPO), meaning that any works to the trees require permission from the local authority.
- 1.4 Ultimately these designations mean that any development at Leisure Lakes must be carefully scrutinised for its compatibility with the development plan, having regard to any other material considerations.

## 2.0 The Development Plan

- 2.1 The statutory development plan is the West Lancashire Local Plan 2012-2027, ('the Local Plan') adopted by the Council in October 2013. Also of relevance is the supplementary planning document, Development in the Green Belt, adopted in October 2015.
- 2.2 Consideration of the Leisure Lakes Masterplan development (planning permission reference 2017/0756/OUT, 11 July 2018) identified key Local Plan policies:
  - SP1 – A sustainable development framework for West Lancashire
  - GN1 – Settlement boundaries
  - GN3 – Criteria for sustainable development
  - EC2 – The rural economy
  - EN2 – Preserving and enhancing West Lancashire's natural environment

## 3.0 Material considerations

- 3.1 The National Planning Policy Framework (NPPF, December 2023) is an important material consideration for planning applications.
- 3.2 The Government's online Planning Practice Guidance (PPG) supports and elaborates on the content of the NPPF so is also a relevant reference.
- 3.3 Paragraph 7 of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 explains:

“...the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so

that opportunities can be taken to secure net gains across each of the different objectives):

- a) an economic objective - to help build a strong, responsive and competitive economy...
- b) a social objective - to support vibrant and healthy communities...
- c) an environmental objective - to protect and enhance our natural, built and historic environment...

3.4 Paragraph 9 of the NPPF advises that plans and decisions should take local circumstances into account, responding to different opportunities for achieving sustainable development in different areas.

3.5 Paragraph 88 of the NPPF expresses how planning policies and decisions should enable a prosperous rural economy, including:

“sustainable rural tourism and leisure developments which respect the character of the countryside.”

3.6 In designated Green Belt areas paragraph 150 of the NPPF directs that:

“...local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”

3.7 Proposals for development affecting Green Belt are covered in paragraphs 152-156 of the NPPF. These considerations are applicable to the development at Leisure Lakes and are reviewed later, in Section 5 of this Assessment.

#### 4.0 The Local Plan proposals map

4.1 An extract from the Local Plan proposals map is contained in Appendix 1. The approximate boundary of the Leisure Lakes site has been added in red – a more extensive area than the planning application site. The following designations can be seen to apply to the land:

- } Green Belt washes over the entire site.
- } The woodland and large water bodies at the south end of the site are a Nature Conservation Site, subject to the provision of Policy EN2.1.
- } There are Mineral Safeguarding Area designates covering the central woodland and lakes, and a separate area to the northeast, close to Mere Brow, straddling the Leisure Lakes access road.



} The north-east part of the Leisure site, next to Mere Brow village and adjoining Southport New Road is covered by a Landscape History designation to which policy EN2.6(ii) applies.

4.2 The glamping pods development site is covered by Green Belt, nature conservation and mineral safeguarding designations, but not landscape history,

## 5.0 Green Belt

5.1 Both the NPPF and the Local Plan presume that the development in Green Belt is harmful. NPPF paragraph 152 states:

“Inappropriate development is, by definition, harmful to Green Belt and should not be approved except in very special circumstances.”

5.2 NPPF paragraph 154 lists some exceptions to the presumption that the construction of new buildings is inappropriate. Paragraph 155 specifies other forms of development, such as mineral extraction, which are not inappropriate and may be supported in principle. The development of new holiday accommodation on previously undeveloped land does not fall under any of the exceptions or allowances contained in paragraphs 154 and 155.

5.3 The glamping development is, by definition, an inappropriate development type which the NPPF says should only be approved in very special circumstances. The fact that the glamping pods have already been constructed does not change or dilute the necessity for very special circumstances to exist for the development to be acceptable.

5.4 The Applicant is confident that very special circumstances do exist in this case, as evidenced in this Assessment.

## 6.0 Ecology

6.1 Policy EN2 of the Local Plan operates to safeguard the natural environment. It does that by limiting development in locally designated nature conservation sites, including the County Council designated Biological Heritage Site (BHS) at Leisure Lakes, to that which is necessary to meet an overriding public need, or where it is carried out for the purposes of nature conservation.

6.2 The NPPF pulls in a similar direction; paragraphs 180 and 186 are concerned with conserving and enhancing the natural environment, including securing net gains for biodiversity, and building resilient ecological networks. In the context of making decisions about planning applications paragraph 186 is directed at the avoidance of significant harm to biodiversity in the first place, with mitigation or compensatory measures secured where those impacts cannot be avoided. A stricter approach applies where adverse impact on a Site of Special Scientific Interest is likely, but there are no such designations within or close to the land at Leisure Lakes.

- 6.3 The proposals bound into the approved Leisure Lakes Masterplan development provide a substantial boost to biodiversity assets on the Leisure Lakes site, through a combination of significant habitat creation, long term site-wide management to support biodiversity, managed access and improved site user education. Details are set out in the Habitat Creation, Management and Maintenance Plan Rev. C, April 2018 ('the habitat plan'), which is key component of the Masterplan permission (2017/0756/OUT).
- 6.4. The habitat plan focusses on management and expansion of woodland areas at Leisure Lakes. There are no proposals in the habitat plan for intervention on the island site where the glamping pod development has taken place. Urban Green completed an ecological appraisal of development site in late 2023 and judged that any impacts that occurred on the island because of the development are minor – primarily the loss of a small area of grassland which may have been an occasional resting place for birds – and that opportunities exist to provide enhancements which could be required as part of a retrospective planning permission.
- 6.5 The drop off area, site warden's static caravan and the shipping container storage unit are located off the island within woodland Area C defined in section 3.1 of the habitat plan (also referred to as 'Chalet Area'). Area C is a silver birch woodland where occasional camping activity has helped to suppress bramble scrub encroachment and ground cover is predominantly grass and short ephemeral species. The approved Masterplan shows 48 holiday cabins sited in gaps within the Area C woodland. The Wardens caravan and shipping container have been sited in woodland gaps, following the principles of the Masterplan and they are both readily moveable structures. No trees have been lost to the placement of these components of the development.
- 6.5. Urban Green is content that ecology impacts arising from the development have been largely inconsequential for the application site as a whole and the suggested provision of bat boxes, bird boxes, hedgehog homes and hibernacula, together with careful site management and implementation of a nature-sensitive lighting scheme, will ensure ecology in and around the site is safeguarded encouraged and supported.

## 7.0 Rural economic growth and tourism

- 7.1 Paragraph 88 of the NPPF asks planning policy makes and decision takers to be enablers of a rural business, including rural tourism and leisure developments. Which respect the character of the countryside.
- 7.2 Paragraph 6.24 of the Local Plan notes that West Lancashire has a relatively weak tourism economy, but with potential for improvement. Policy EC2 – The Rural Economy – provides encouragement for schemes that will enhance tourism by taking advantage of some of the Borough's natural and heritage assets. As an

established leisure and tourism facility, Leisure Lakes is an appropriate candidate for such improvement and the Masterplan permission provides unequivocal recognition of that status.

## 8.0 Other policy considerations

- 8.1 The development of glamping pods does not conflict with Minerals Safeguarding Area policy considerations, or those relating to Landscape History that touch the wider Leisure Lakes site.
- 8.2 Leisure Lakes owes its existence to sand and gravel extraction, long since ceased. Any remaining natural mineral resources will remain and will not be lost to the development. The proposed glamping pods, and the holiday homes and static caravans already approved in the Masterplan are 'light touch' in terms of their impact on the ground and easily removed in the future should the need to exploit mineral resources ever to become an overriding factor.
- 8.3 The Landscape History designation applies to a relatively small part of the Leisure Lakes site, where planning permission has already been granted for the 18-hole golf course development. That development has full planning permission which has been implemented (2015/0098/FUL) and will be undertaken in a manner that is sympathetic to those local landscape considerations. The 18-hole golf course site is outside the boundary defined for this glamping pods application and the Landscape History designation several hundred metres away from the development site.

## 9.0 Addressing the key planning policy issues

- 9.1 The proposal to retain newly constructed glamping units at Leisure Lakes draws broad support from the NPPF and the West Lancashire Local Plan and it fits neatly with the type and pattern of development already approved in the Leisure Masterplan. The development has been a positive addition to the local economy. It is a popular facility that has increased tourism visitor numbers and spend, creating spin-off opportunities for local businesses. It is contributing to addressing the Local Plan's concern about weakness in the local tourism economy.
- 9.2 The development will help to achieve several of the positive objectives for use of the Green Belt set out in paragraph 150 of the NPPF; it will enhance the beneficial use of the Green Belt by providing access with educational content, along with opportunities for participation in outdoor sport and recreation on the wider Leisure Lakes site. It has retained the landscape and not detracted from the biodiversity of the land.
- 9.3 Ultimately if the Council is to support this planning application for Leisure Lakes Masterplan it is incumbent on Leisure Lakes to satisfy the Council on the important planning considerations relating to development in the Green Belt and the outcomes for nature conservation and ecology as a whole.

- 9.4 This planning policy assessment and the material submitted in support of the planning application demonstrate that:
- } very special circumstances exist to allow inappropriate development in the Green Belt, as required by the NPPF; and
  - } that there is an overriding public need for the development, meeting the stipulation in policy EN2 of the Local Plan.
- 9.5 On very special circumstances, the development accords fully with the NPPF's support for expansion of tourist and visitor facilities and it would also meet the Local Plan's call for provision of improved tourism facilities, having the distinct advantage of being focussed on an existing well-established tourism and leisure asset.
- 9.6 There is recognition that tourism is an underperforming sector of the local economy; any alternative sites would be equally if not more constrained than Leisure Lakes. Much of West Lancashire is covered by Green Belt designation and very large swathes also contain some of the best and most versatile agricultural land in the country, important locally and nationally for sustainable fresh food production, and its allied industries.
- 9.7 Providing improved tourism facilities at this established site is a sustainable approach, making best use of the established water bodies, woodland and other existing natural tourism assets, rather than seeking to create virgin alternatives elsewhere.
- 9.8 Leisure Lakes demonstrably has the environmental capacity to provide a significant response to the Local Plan's concern about weakness in the local tourism economy, setting good quality holiday accommodation in established and expanded woodland around the central focus of the waterbodies, which will minimise external visibility of the development and ameliorate any perceived impact on openness of the Green Belt. In that respect, Leisure Lakes is believed to be a unique opportunity in West Lancashire, which contributes significantly to the existence of very special circumstances for allowing development in this location. The 2020 masterplan for the site provides a structure for a beneficial tourism development which the development undertaken by Four Seasons wholly complements.
- 9.9 The glamping development has been accommodated on a small, well-defined area without any material loss of trees or habitat. It leaves intact the masterplan strategy and of securing significant gains for ecology, including opportunities to form substantial areas of new woodland habitats, linking up with existing habitats on and near the Leisure Lakes site to improve ecology networks. The improvement of existing habitats and the long-term management of the whole site with ecology at the heart is a core principle of the Masterplan development, respected by the glamping pods development.

- 9.10 The Applicant has already shown an understanding of and commitment to positive change for ecology through the proposed 18-hole golf course and Masterplan development schemes which were presented and approved under the umbrella of a Habitat Creation, Management and Maintenance Plan. The habitat plan covers all core land at Leisure Lakes where transformation is planned to a modern holiday and leisure destination with a variety of sleeping accommodation. The habitat plan applies and operates on a site-wide basis, helping to ensure future positive stewardship of woodland and ecology assets on the site.
- 9.11 Leisure Lakes is an established enterprise, providing a wide range of opportunities for outdoor sport and recreation. Its facilities require modernisation in order to maintain a viable business in the future that is sufficiently profitable to be able invest positively in the care of the BHS and the facilities that encourage and enable visitors to access and gain an appreciation of the countryside and its nature conservation value. The Applicant recognises it has an environmental responsibility and has made a clear commitment to that through the masterplan development.
- 9.12 On policy EN2's overriding public need test, the approved masterplan demonstrated that allowing a proportionate amount of development is essential to secure the future of the BHS and the value that such habitats have to nature conservation and public understanding of ecology.
- 9.13 BHS are locally designated ecology sites. Designation brings theoretical limitations but no positive obligation to manage land and habitats for the benefit of the ecology assets that warranted designation in the first instance. As an established outdoor leisure facility the activities at Leisure Lakes legitimately subject the BHS to pressure, but with an absence of corresponding effective regulation and control.
- 9.14 The Masterplan planning permission has recognised and documented the opportunity for positive change to the condition of the BHS and established binding commitments to create enlarged habitats of greater ecological value, with corresponding measures to be established to ensure long-term management on a site-wide basis for the benefit of ecology.
- 9.15 Without this positive intervention and change the established formal and informal leisure activities threatened to undermine the potential ecological value of the BHS. The provisions of the approved masterplan development, also embraced by the glamping units, enable a rebalancing of leisure and ecology uses so that the two can co-exist harmoniously and ecology can thrive. The glamping pod development has been undertaken in that knowledge. It provides a limited source of rental income for the owner of Leisure Lakes at an important time when the transition from old to new leisure uses is starting and previous sources of income are, of necessity, being lost from the site to facilitate the transformation process.

## 10.0 Conclusion

10.1 Very special circumstances are necessary to allow inappropriate development in the Green Belt. At Leisure Lakes, the harm that must be outweighed by those very special circumstances is limited and the positive outcomes of the glamping development which balance against that limited harm are both significant and weighty.

10.2 There are several considerations weighing heavily in favour of the proposal:

- } support for a prosperous rural economy set out in the NPPF;
- } a call from the Borough Council for tourism improvements set out in the Local Plan;
- } the pre-existence of Leisure Lakes and its facilities as a significant tourism and leisure destination;
- } the 2020 approved Masterplan development which provides a structure for transformation of the facilities at Leisure Lakes to one providing contemporary tourism accommodation in a green setting managed positively for the benefit of biodiversity.
- } the fact that almost any other location in the Borough would be in the Green Belt and similarly constrained but lacking the established holiday and leisure infrastructure.
- } together with the substantive and long-term improvement to the quantity and quality of designated ecology habitats that would be secured.

10.3 Taken together, these considerations are considered to amount to very special circumstances that clearly outweigh the harm to the Green Belt by reason of the inappropriateness of the development and the very modest impact arising from loss of openness and visual impact that would occur as a result of the development.

10.4 The ecological benefits of development have been secured through the Leisure Lakes Masterplan, which has been implemented by formation of the static caravan pitches in masterplan Zone 4. The masterplan development framework safeguards and improves the Biological Heritage Site and ensures its future resilience, and the glamping development has been undertaken in a location and manner which respects and complements approved elements of the masterplan. The masterplan interventions are necessary to deliver and maintain the public interest element of the BHS land.

10.5 Overall the development is contributing to the transformation of Leisure Lakes to a location that will deliver significant gains for biodiversity, renew an established leisure facility and address a range of environmental issues associated with the current use of the land. It is of considerable planning merit.

# Appendix 1

West Lancashire Local Plan Proposals Map

Extract showing the Leisure Lakes site edged red (a larger area than the application site)

