

DELEGATED REPORT

Application Reference:	PL/2026/02552
Application Type:	Prior approval Part 4 Class BC: Temporary Recreational Campsites
Site Address:	Borrowback Stables, Roman Road, Ford, Salisbury, SP4 6DL
Proposal:	Prior Approval for use of land as temporary campsite - see application for dates.
Recommendation:	Prior Approval is Refused

POLICIES:

National Planning Policy Framework (NPPF)
Planning Practice Guidance (NPPG)
Town & Country Planning (Permitted Development) (England) Order 2015 (as Amended) (GPDO)
2024 Strategic Flood Risk Assessment

PRIOR NOTIFICATION PROCESS:

Permitted development

BC. Development consisting of—

- (a) the use of any land as a recreational campsite for not more than 60 days in total in any calendar year; and
- (b) the provision on such land of—
 - (i) not more than 50 pitches; and
 - (ii) any moveable structure reasonably necessary for the purposes of the permitted use.



Site location

5. Dates of use	
Please provide details of the dates on which the site will be in use as a temporary recreational campsite:	
Start date (DD/MM/YYYY)	End date (DD/MM/YYYY)
01.05.2026	04.05.2026
22.05.2026	07.06.2026
19.06.2026	21.06.2026
03.07.2026	05.07.2026
17.07.2026	19.07.2026
23.07.2026	26.07.2026
30.07.2026	03.08.2026
06.08.2026	09.08.2026
13.08.2026	16.08.2026
20.08.2026	23.08.2026
27.08.2026	01.09.2026

Proposed Dates

Development not permitted

BC.1 Development is not permitted by Class BC—

- (a) on a site of a scheduled monument;
- (b) in a safety hazard area;

- (c)in a military explosives storage area;
- (d)on a site of special scientific interest;
- (e)on a site of a listed building;
- (f)for the siting of any caravan except a caravan which is used as a motor vehicle designed or adapted for human habitation.

The proposal meets the above criteria.

Conditions

BC.2 Development is permitted by Class BC subject to the following conditions—

- (a)the developer must make on-site provision for users of the campsite of toilet and waste disposal facilities;
- (b)the developer must notify the local planning authority in writing before commencement of development in each calendar year, providing a copy of the site plan, which must include particulars of—
 - (i)toilet and waste disposal facilities; and
 - (ii)the dates on which the site will be in use;
- (c)the local planning authority (if not the same body as the fire and rescue authority in an area) must as soon as practicable provide to the relevant fire and rescue authority the notice described in paragraph BC.2(b); and
- (d)where the proposed development is on land within Flood Zone 2 or Flood Zone 3, the permitted development is subject to prior approval by the local planning authority before commencement of development in each calendar year.

Procedure for applications for prior approval under Class BC

BC.3—(1) The following provisions apply where under Class BC a developer is required to apply to the local planning authority for prior approval.

- (2) The application must be accompanied by—
 - (a)a site-specific flood risk assessment, including provision for warning and evacuation; and
 - (b)any fee required to be paid.
- (3) On receipt of the application, the local planning authority must notify and consult the Environment Agency specifying the date by which they must respond (being not less than 21 days from the date the notice is given).
- (4) The local planning authority must, when determining the application—
 - (a)take into account the response by the Environment Agency; and
 - (b)have regard to the National Planning Policy Framework [F2](#)... so far as relevant to the subject matter of the prior approval, as if the application were a planning application.
- (5) The development must not begin before either—
 - (a)the receipt by the developer from the local planning authority of a written notice giving their prior approval; or
 - (b)the expiry of 56 days following the date on which the application was received by the local planning authority without the authority notifying the applicant as to whether prior approval is given or refused.
- (6) The local planning authority may grant prior approval unconditionally or subject to conditions reasonably related to the subject matter of the prior approval.]

ASSESSMENT

The Environment agency has been consulted regarding the submitted flood risk assessment, as the site lies within Flood Zones 2 and 3, in an area at high risk from ground water flooding.

The EA commented:

*We **object** to the proposed development as it falls within a flood risk vulnerability category that is inappropriate to the Flood Zone in which the site is located. The application is therefore contrary to the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG); we recommend refusal on this basis.*

NPPF Annex 3 classifies development types according to their vulnerability to flood risk. The PPG Table 2 provides guidance on which developments are incompatible with certain Flood Zones. This site lies within Flood Zone 3b functional floodplain, which is land defined by the NPPF as having a high probability of flooding.

The proposed development is classified as more vulnerable in accordance with Annex 3 of the NPPF, Table 2 of the PPG makes it clear that this type of development is not compatible with this Flood Zone and therefore should not be permitted.

Inadequate Flood Risk Assessment

The submitted Flood Risk Assessment (FRA) does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change Planning Practice Guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess whether the development will increase flood risk elsewhere. In particular, the FRA fails to:

Consider how a range of flooding events (including extreme events) will affect people and property

- Consider how people will be kept safe from the identified flood hazards*
- There is no assessment of the impact of climate change using appropriate climate change allowances*
- Provide clarity as to the timeframe of the proposed temporary campsite.*

Overcoming our objection.

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above. If this cannot be achieved, we are likely to maintain our objection.

CONCLUSION:

The proposed development is considered not to comply with the criteria set out in paragraphs **BC.3—(4)(a) and (b) of Class BC** of the GPDO given the Environment Agency objection, thereby making it temporary development that would be at risk from flooding which would not benefit from the permitted development rights set out in the Class.

Prior approval from the LPA is required in respect of the flood risks to the site and is refused.

RECOMMENDATION:

That Prior Approval is required in respect of the flooding risks in relation to the site as set out in the submitted site-specific flood risk assessment. The Environment Agency have objected to the temporary use of the land as a campsite, as it falls within a flood risk vulnerability category that is inappropriate to the Flood Zone in which the site is located. The application is therefore contrary to the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) and paragraphs BC.3—(4)(a) and (b) of Class BC of the GPDO.

Prior Approval is REFUSED