

LAKE 62, COTSWOLD WATER PARK

VISITOR ACCOMMODATION PROPOSALS

PLANNING SUPPORTING STATEMENT

Outline Planning Application for 38 Holiday Units and Ancillary Commercial Uses

Lake 62, Cotswold Water Park, Ashton Keynes, Wiltshire, SN6 6QT

Prepared for: Landowner, Confidential

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1 INTRODUCTION, PURPOSE AND OVERVIEW

1.1 PURPOSE OF THIS STATEMENT

- 1.1.1 This Visitor Accommodation Supporting Statement ("the Statement") has been prepared by Bluestone Planning on behalf of the landowner of Lake 62, Cotswold Water Park, Ashton Keynes, Wiltshire (SN6 6QT). It is submitted in support of an outline planning application to Wiltshire Council for the change of use of land at Lake 62 to provide up to 38 holiday units, together with new ancillary commercial buildings including, subject to the demonstration of demand, uses such as a café, cycle hire, and other complementary leisure retail together with new access arrangements and associated infrastructure.
- 1.1.2 The Statement has a single, primary purpose: to demonstrate, through robust and irrefutable evidence, that there is a proven and growing demand for holiday accommodation at this location, and that the proposed development is consistent with, and positively supported by, national planning policy, the adopted development plan, and the strategic objectives of relevant tourism and visitor economy bodies.
- 1.1.3 The Statement should be read in conjunction with the full suite of documents submitted with this planning application and has been informed by the two-stage site appraisal and market assessment process described below.

1.2 BACKGROUND AND COMMISSION

- 1.2.1 This application follows a history of investigative and pre-application work at the site and in its immediate context. In August 2022, Wiltshire Council refused an application for two converted shipping container units for tourist accommodation (reference PL/2021/06229) on grounds that included both the design quality of the proposed structures and the absence of adequate evidence of demand for the type of provision proposed in this locality.
- 1.2.2 That refusal, and the lessons drawn from the Officer's report and Delegated Decision Notice, directly informed the approach taken by the current landowner. It established two clear requirements which this Statement and the wider application package are designed to address: the need for accommodation of high design quality that is consistent with, and enhances, the character of the Cotswold Water Park; and the need for a comprehensive, independently evidenced assessment of demand for visitor accommodation at this location.
- 1.2.3 To address those requirements, Bluestone Planning commissioned Hotel Solutions, a national market-leading tourism consultancy, together with Forward Land, to undertake a two-stage appraisal of the opportunity at Lake 62. Stage 1, delivered in March 2026 (the "Site Appraisal"), assessed the strategic development options for the site, reviewed the competitive market, analysed live pricing data, and identified the type of holiday accommodation most likely to succeed commercially and secure planning consent. The present Statement draws extensively on the findings and data assembled as part of that Stage 1 commission, alongside the wider evidence base described below.
- 1.2.4 In addition, this Statement draws on evidence assembled in connection with a nearby development, an appeal-allowed scheme for up to 70 holiday units to the south of the site on land off Spine Road East (Wiltshire Council reference PL/2022/04776), which was determined on non-determination grounds. That case resulted in Wiltshire Council accepting the principle of holiday accommodation in this locality, and a number of the

planning policy arguments and supporting assessments produced for that application are directly relevant to the present proposal, notwithstanding that the products are of a different nature.

1.3 HOTEL SOLUTIONS & FORWARD LAND

- 1.3.1 **Hotel Solutions** is a market-leading UK consultancy specialising in hotel and visitor accommodation strategy, studies and development. The practice was founded by Lynn Thomason and Andrew Keeling, both of whom have built careers at the highest level of the hotel and tourism sector before establishing their joint specialism in strategic accommodation planning and market assessment.
- 1.3.2 Lynn Thomason served as Research and Development Manager at the East Midlands Tourist Board, developing expertise in tourism planning, research, and investment strategy before moving into independent consultancy. The combined experience of both principals provides the practice with a rare combination of commercial operational knowledge and strategic planning expertise.
- 1.3.3 Hotel Solutions has worked in over 150 destinations and completed more than 200 strategic studies for public sector, private sector and third sector clients across the UK. Their commissions include work for major city authorities, destination management organisations, leisure and property developers, national bodies, and National Park authorities. Their studies have directly informed Local Plan policymaking, the determination of planning applications, and inward investment strategies.
- 1.3.4 Notably they were commissioned by VisitWiltshire and the Swindon and Wiltshire Local Enterprise Partnership. This remains the only strategic-level independent assessment of visitor accommodation across Wiltshire and its findings and conclusions continue to carry significant weight in the determination of planning applications in the county, including at this site.
- 1.3.5 Hotel Solutions has an established specialism in planning policy issues relating to visitor accommodation development. The practice has prepared guidance documents for local authorities, contributed expert evidence to planning appeals, and produced strategic studies that have directly shaped adopted Local Plan tourism policies. Their appointment brings both independent credibility and deep sector expertise to the evidence base underpinning this application.
- 1.3.6 **Forward Land** is a specialist sustainable tourism consultancy providing strategic planning, development management, and operational advisory services to landowners, local authorities, and public sector bodies across the UK. The practice is led by Adam Gough, who has worked in the UK domestic tourism sector since 2006, with prior experience in leisure-focused private equity real estate projects in the United States and New Zealand. The practice operates exclusively within the tourism and visitor accommodation sector, bringing a focused, end-to-end understanding of the full project lifecycle from market research and feasibility through to planning consent, operational setup, and exit strategy.
- 1.3.7 Forward Land has built a specific track record of securing planning consents for sustainable holiday accommodation in sensitive and constrained locations, including National Parks, Areas of Outstanding Natural Beauty, and sites subject to significant ecological and landscape designations. This direct experience of navigating the planning system in precisely the type of sensitive countryside setting presented at Lake 62 is central to their value.
- 1.3.8 The long-standing professional partnership between Hotel Solutions and Forward Land means that their combined work for Lake 62 draws on a genuinely integrated combination of strategic market intelligence,

commercial tourism expertise, and practical planning experience in sensitive rural locations. This is precisely the combination required to produce a robust and credible evidence base for a proposal of this nature.

1.4 OVERVIEW OF THE PROPOSED DEVELOPMENT

- 1.4.1 This application is made in outline form, with all matters reserved except for access and the principle of the change of use. The principle of the change of use and the means of access to the site are the only matters for determination at this stage. Questions of layout, scale, appearance, and landscaping, including the precise form, design, and configuration of the holiday units and any ancillary buildings are expressly reserved for subsequent Reserved Matters applications.
- 1.4.2 This approach has been deliberately adopted to reflect the current stage of the project and the landowner's position. The outline permission, if granted, will establish the principle of holiday use at this location beyond the existing planning context, providing the flexibility necessary for the detailed development proposals to be refined and optimised including in terms of design, unit type, configuration, and landscape integration, before being submitted for approval at the Reserved Matters stage.
- 1.4.3 The parameters of the outline proposal are as follows:

Parameter	Description
Number of units	Up to 38 holiday units
Unit type	Holiday accommodation with detailed type, design and specification to follow in the Reserved Matters stage
Ancillary uses	Ancillary commercial buildings including potential bike/water leisure hire, café and complementary retail
Matters reserved	Layout, scale, appearance and landscaping, all reserved
Matters for determination	Principle of change of use; means of access
Site area	Approximately 12 hectares in total, comprising approximately 5ha land parcel and approximately 7ha private lake
Location	Lake 62, Cotswold Water Park, Ashton Keynes, Wiltshire, SN6 6QT

- 1.4.4 The applicant intends, following the grant of outline permission, to bring forward Reserved Matters applications that will address the detailed design, layout, and specification of the holiday units and any associated infrastructure and commercial buildings. Beyond this, questions of detailed unit design and site layout remain to be resolved and are not matters for determination in this outline application.
- 1.4.5 The outline approach is consistent with the approach taken in the nearby appeal-allowed scheme and is specifically designed to give the planning authorities the ability to consider and approve the principle of the use without prejudging the detailed form that the development will take. This flexibility is important in the context of a sensitive landscape setting, where careful Reserved Matters design work will be essential to ensure that the development integrates appropriately with the Cotswold Water Park setting.

1.5 THE SITE IN CONTEXT

- 1.5.1 Lake 62 occupies a strategically significant position within the western Cotswold Water Park ("CWP"). The 12-hectare holding comprises approximately 5 hectares of land fronting the B4696 Spine Road, together with a privately owned 7-hectare freshwater lake in the centre of the site, one of the many former gravel extraction lakes

that collectively form the Cotswold Water Park. The combination of a substantial landholding and a privately owned lake is uncommon within the CWP and creates a site of reasonable development potential for quality holiday accommodation.

- 1.5.2 The site lies outside the settlement boundary of Ashton Keynes, within the open countryside, and falls within the Cotswold Water Park Site of Special Scientific Interest (SSSI). It is also within or adjacent to the Cotswolds National Landscape (formerly AONB). These are material planning considerations that are addressed in full within the application documentation and are placed in proper context within the planning policy framework set out in Section 3 of this Statement.
- 1.5.3 The site is accessible directly from the B4696 Spine Road, the primary tourist access route through the western CWP, and lies within approximately 25 minutes' drive of Junction 15 of the M4 motorway. The village of Ashton Keynes, a conservation area with a range of local services, the White Hart Inn, and access to the Thames Path National Trail, adjoins the southern boundary. The site's location within the established Cotswold Water Park destination, its proximity to a major conurbation's population catchment of approximately 16 million people within a two-hour drive time, and its private lake asset together define its potential as a site for high-quality visitor accommodation.
- 1.5.4 The physical characteristics of the site, including the private lake, road access, flood risk profile, SSSI position, and landscape setting, are addressed in detail in Section 2 of this Statement and in the supporting technical documents submitted with the application.

1.6 STRUCTURE OF THIS STATEMENT

- 1.6.1 This Statement is structured as follows:

Section	Content
Section 1	Introduction, purpose and overview of the proposals (this section)
Section 2	The site: location, physical characteristics, and planning history
Section 3	Planning policy framework: national, local and strategic policy
Section 4	The Cotswold Water Park as a tourism destination
Section 5	Evidencing demand: national, regional and local tourism trends
Section 6	Site-specific demand case: the Lake 62 opportunity
Section 7	Economic and tourism benefits of the proposal
Section 8	Summary and conclusions

2 THE SITE: LOCATION, PHYSICAL CHARACTERISTICS AND PLANNING HISTORY

2.1 LOCATION AND SETTING

- 2.1.1 Lake 62 is located within the Cotswold Water Park, to the north-west of Ashton Keynes in Wiltshire (grid reference SU 025 936, postcode SN6 6QT). The site fronts the B4696, variously known as Spine Road West and Ashton Road, which is the primary tourist access route through the western section of the Cotswold Water Park and the main artery connecting the Park to the A419 and the M4 motorway at Junction 15, approximately seven miles to the south-east.
- 2.1.2 The site is located outside the settlement boundary of Ashton Keynes and is, for planning policy purposes, situated within the open countryside. The village of Ashton Keynes, a designated conservation area containing the White Hart Inn, a variety of local services, and access points to the Thames Path National Trail, adjoins the southern boundary of the site. The proximity of the village provides the site with genuine walkable access to an authentic rural settlement, which is itself a significant asset for visitor accommodation.
- 2.1.3 Access to the wider strategic road network is good. Junction 15 of the M4 motorway is approximately 25 minutes by car, bringing the site within direct reach of the M4 corridor, Greater London, and the South East. The A419 and A417 provide onward connectivity to Cirencester, Cheltenham, Gloucester, Swindon, and the Midlands. The nearest mainline railway station is at Kemble, approximately three miles from the site, serving direct routes between Swindon and Gloucester. As established in the Stage 1 appraisal by Hotel Solutions and Forward Land (March 2026), the total residential population within a two-hour drive time catchment is estimated at 16 million people, encompassing Greater London, the South East, the South West, the Midlands, and Wales.
- 2.1.4 The Cotswold Water Park, now increasingly referred to as Cotswold Lakes following a rebranding initiative by the Cotswold Lakes Trust, covers approximately 42 square miles of Wiltshire and Gloucestershire countryside and encompasses more than 180 lakes formed from former sand and gravel extraction workings. It is promoted by VisitWiltshire as a major leisure and tourism destination offering a wide range of water-based and countryside activities. The site occupies an advantageous position within the western, less commercialised part of the Park, offering relative seclusion and tranquillity while retaining direct frontage on the primary access road.

2.2 PHYSICAL CHARACTERISTICS OF THE SITE

- 2.2.1 The site extends to approximately 12 hectares in total and comprises two physically distinct but contiguous components: a land parcel of approximately 5 hectares and a privately owned freshwater lake of approximately 7 hectares. As a combined land-and-water holding in single ownership, it is one of the largest individual landholdings within the western Cotswold Water Park.
- 2.2.2 The table below summarises the key physical components of the site and their significance for the proposed development.

Component	Area	Characteristics	Development Significance
Land parcel	c.5ha (12 acres)	Rectangular, fronting Spine Road to the north. Southern boundary close to Ashton Keynes village edge.	Primary location for holiday units, hub building, car parking, landscaping and access road.

Private lake	c.7ha (17 acres)	Inland freshwater lake, former gravel extraction origin, consistent with other CWP lakes. Owned in entirety as part of the site.	Potential for lakeside lodge siting, private jetties, non-motorised watersports and fishing. Owned privately the lake has no shared access with other operators.
Road frontage	B4696 Spine Road West and Ashton Road	Primary tourist route through the western CWP. Direct vehicular access available from the B4696.	High visibility from main destination road. Direct access without passing through any settlement.
Village proximity	Southern boundary	Conservation village; Thames Path National Trail; White Hart Inn; local services.	Walking distance to authentic rural amenity. Positive asset for visitor marketing. Requires careful management of residential amenity.
Topography	Flat to gently undulating	Land parcel broadly level. Lake occupies a natural basin.	Suitable for low-impact development. Landscape strategy required to provide setting and visual containment.
External factors	Site boundaries	Mineral extraction and storage operations adjoin the north-eastern boundary. B4696 generates road noise from the north.	Careful siting, landscape earthworks and defensive planting will be required along northern and north-eastern boundaries to mitigate noise and visual impact on certain units.

2.3 PLANNING DESIGNATIONS AND CONSTRAINTS

2.3.1 The site is subject to a number of planning designations that form the policy context for the proposed development. These are summarised below and addressed in full in Section 3 and in the supporting technical assessments submitted with the application.

Cotswold Water Park Site of Special Scientific Interest (SSSI)

2.3.2 The entire application site falls within the Cotswold Water Park SSSI, designated for its importance as a wetland habitat for wintering and breeding birds and for its aquatic invertebrate communities. The Ecological Impact Assessment submitted with this application addresses the SSSI in full. During the 2021/22 application process, Natural England initially objected but subsequently rescinded its objection following revisions to the scheme and the provision of appropriate mitigation. The Stage 1 appraisal notes that, professionally managed, the SSSI constraint can function as a competitive advantage: it enforces the design quality and low-density approach that commands premium pricing and protects the site from volume tourism development in perpetuity.

Cotswolds National Landscape (formerly designated AONB)

2.3.3 The site lies within or immediately adjacent to the Cotswolds National Landscape, which carries the highest level of landscape protection available under national planning policy. The designation requires that great weight be given to conserving and enhancing landscape and scenic beauty, and that the scale and extent of development within these areas be limited. However, it does not constitute an absolute bar to development of any kind. National policy at paragraph 88(c) of the NPPF (December 2024) expressly supports sustainable rural tourism and leisure developments that respect the character of the countryside. The Landscape Visual Impact Assessment submitted with this application addresses the National Landscape in full. The designation is

simultaneously a planning constraint and a positive commercial asset: it is a primary driver of visitor demand to this destination.

Flood Risk

2.3.4 The site is subject to variable flood risk. The majority of the land parcel falls within Flood Zone 1. Parts of the boundary and the lake area fall within Flood Zones 2 and 3. During the 2021/22 application, the Environment Agency raised no objection following submission of a revised Flood Risk Assessment and repositioning of units outside Flood Zone 3. The Flood Risk Assessment submitted with the present application addresses flood risk in full in the context of the outline parameter plans.

Open Countryside / Settlement Boundary

2.3.5 The site falls outside the defined settlement boundary of Ashton Keynes and is classified as open countryside for the purposes of the Wiltshire Core Strategy. Development in the open countryside is restricted under Core Policies 1 and 2. However, Core Policy 39 (Tourist Development) and Core Policy 54 (Cotswold Water Park) provide specific and positive policy support for appropriate tourist accommodation in this location. These policies are examined in detail in Section 3.

2.4 PLANNING HISTORY

2.4.1 The planning history of Lake 62 is directly relevant to this application. It establishes the specific requirements that the present application be designed to address and identifies the precedent set by nearby consents and appeals that are material to its determination.

Reference	Proposal	Outcome
N/03/03088/COU	Use of water of Lake 62 for personal watercraft members club.	Withdrawn
N/03/00782/COU	Use of lake for personal watercraft members club and activity centre.	Withdrawn
N/06/01730/FUL	Boat house with ancillary accommodation (domestic use only).	Withdrawn
PL/2021/04577	Installation of a 2.4m high security fence within and on the perimeter of the site and erection of two pairs of gates.	Approved with conditions
PL/2021/06229	Change of use of land to provide two converted shipping container units for tourist accommodation, with associated landscaping and parking.	REFUSED, August 2022

The 2022 Refusal: PL/2021/06229

2.4.2 The refusal of application PL/2021/06229 in August 2022 is the most significant item of planning history for this site. The application sought the change of use of land at Lake 62 to accommodate two converted shipping container units for tourist accommodation. Wiltshire Council refused the application on two grounds.

2.4.3 The first ground concerned design quality. The Officer concluded that the converted shipping containers were of a form, mass, bulk and industrial character inconsistent with the Cotswold Water Park setting. The Officer noted that such structures were "typically found within built up locations and employment areas" and that the proposal would appear "as an incongruous and discordant feature" in the landscape. The absence of a Landscape Visual

Impact Assessment was also cited. The proposal was found contrary to Core Policies CP39(iii), CP51, CP54, and CP57 of the Wiltshire Core Strategy and to relevant policies of the Ashton Keynes Neighbourhood Plan.

- 2.4.4 The second ground specifically cited the absence of demand evidence. The Officer's Delegated Report stated that "the application is not supported by any evidence of demand for this type and standard of facility in this location." The report also noted, as a material consideration, that a nearby site at Oaksey Golf Course which had been granted permission for holiday units had subsequently obtained consent for permanent residential use on the grounds of insufficient demand for holiday accommodation in the area.
- 2.4.5 These two requirements, design quality appropriate to the Cotswold Water Park, and robust independently evidenced demand, directly shaped the strategy for the current application. This Statement is specifically prepared to discharge the demand evidence requirement comprehensively. The Design and Access Statement and supporting technical assessments address design, landscape, and amenity.
- 2.4.6 It is important to note that the 2022 refusal concerned only two units of an overtly industrial design type, without any supporting demand evidence. The present application differs in every material respect: it is an outline proposal for up to 38 units with design entirely reserved for Reserved Matters determination; it is supported by a robust, independently produced evidence base; and it proposes no fixed design, materials, or unit type at this stage. The circumstances of the 2022 refusal are not applicable to the present application.

Nearby Consents and Appeals: Material Precedent

- 2.4.7 Two nearby permissions for visitor accommodation are material precedent in the determination of this application.
- 2.4.8 First, Hoburne Cotswold, an established holiday park situated approximately 0.75 miles to the east on Spine Road East, was granted permission by Wiltshire Council for 92 holiday lodge caravan units on land adjacent to its existing site. This permission demonstrates the Council's acceptance in principle of holiday accommodation development at a significant scale on the same road corridor within the Cotswold Water Park.
- 2.4.9 Second, and of greater direct relevance to this application, a planning application was submitted under reference PL/2022/04776 for up to 70 holiday units on land off Spine Road East, within the same Cotswold Water Park setting. That scheme was brought forward by a different landowner and proposed eco-lodge accommodation on a rental basis, a different product type and operational model from the present proposals. The application was appealed to the Planning Inspectorate on grounds of non-determination by Wiltshire Council. Wiltshire Council accepted the case on appeal, meaning that the principle of holiday accommodation development at that scale on land off Spine Road within the Cotswold Water Park was not contested by the Council.
- 2.4.10 The evidence base assembled for PL/2022/04776, including a Stage One Market Review and Stage Two Tourist Accommodation Options Appraisal by Planning Solutions Consulting Limited, and a Tourism Need Assessment by Avison Young (December 2022), forms part of the background material informing this Statement. Notwithstanding the differences in product type and operational model, the demand evidence, policy arguments, and demographic analysis produced for that application are directly relevant to the question of whether there is a proven need for holiday accommodation in this locality. Sections 4 to 6 of this Statement draw on and update that evidence using the latest available data.

2.4.11 Taken together, the Hoburne consent, the accepted appeal for PL/2022/04776, and the established visitor accommodation offer already present within the Cotswold Water Park all confirm that the principle of holiday accommodation development at scale in this locality is well established. The present application builds on that foundation with the benefit of a comprehensively evidenced supporting case.

2.5 KEY FINDINGS SECTION 2

- Lake 62 is a 12-hectare site comprising approximately 5ha of land and a privately owned 7ha freshwater lake within the western Cotswold Water Park, fronting the B4696 Spine Road. The site lies outside the settlement boundary of Ashton Keynes within the open countryside.
- The site is within a two-hour drive time catchment of approximately 16 million people and within approximately 25 minutes of Junction 15 of the M4, providing direct access from Greater London, the South East, the South West, the Midlands, and Wales.
- The site is subject to four principal planning constraints: the Cotswold Water Park SSSI, the Cotswolds National Landscape, variable flood risk, and its open countryside status. None constitutes an absolute bar to appropriate holiday accommodation development, and all are addressed in the supporting technical documentation.
- The privately owned lake is a materially distinctive physical asset not replicated elsewhere in the western Cotswold Water Park. It creates a unique competitive proposition and strengthens the site's potential to deliver high-quality, nature-led visitor accommodation. This is addressed in depth in Sections 5 and 6.
- The 2022 refusal of PL/2021/06229 identified two specific and addressable requirements for any future holiday accommodation proposal at Lake 62: design quality appropriate to the Cotswold Water Park setting, and robust independent evidence of demand. Both requirements are fully addressed in this application.
- The nearby Hoburne consent (92 units) and the accepted appeal for PL/2022/04776 (up to 70 units on land off Spine Road East) together confirm that the principle of holiday accommodation development at scale within the Cotswold Water Park is established. The policies and evidence arguments relevant to those cases are directly applicable to this application.

3 PLANNING & WIDER POLICY FRAMEWORK REVIEW

3.1 INTRODUCTION

- 3.1.1 This section sets out the planning and wider policy framework that is relevant to the determination of this application. It is structured so that each document is reviewed in a discrete sub-section, each concluding with its key findings. Section 3.8 draws those findings together into an overall policy conclusion.
- 3.1.2 The statutory development plan for the application site consists of the Wiltshire Core Strategy (adopted January 2015), the Wiltshire Housing Site Allocations Plan (adopted February 2020), and the Ashton Keynes Neighbourhood Plan (made May 2017). Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications be determined in accordance with the development plan unless material considerations indicate otherwise. The National Planning Policy Framework (NPPF, December 2024) is a material consideration of significant weight and is required to be considered.
- 3.1.3 In addition, the emerging Wiltshire Local Plan, submitted to the Secretary of State for independent examination in November 2024, carries emerging policy weight. Relevant national and regional tourism strategies are also material considerations.
- 3.1.4 The following framework confirms that the proposed development, assessed against current national and local policy, is strongly supported in principle. The specific requirement of the 2022 refusal, to demonstrate demand, is addressed through this Statement and the supporting evidence base. The design requirements identified in the refusal cannot be applied to an outline application with all design matters reserved.

3.2 NATIONAL PLANNING POLICY FRAMEWORK (DECEMBER 2024)

- 3.2.1 The current NPPF was published on 12 December 2024 and took immediate effect for planning decisions from that date. It replaces all previous versions. References in this Statement are to the December 2024 version throughout.

The Presumption in Favour of Sustainable Development, Paragraph 11

- 3.2.2 At the heart of the planning system sits the presumption in favour of sustainable development, set out at paragraph 11 of the NPPF. For decision-taking, paragraph 11(d) requires that planning permission be granted for sustainable development unless the application of policies in the NPPF taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, indicates that permission should not be granted, or where the adverse impacts would significantly and demonstrably outweigh the benefits. This is a higher bar than the previous version of the Framework, which referred to a "clear" rather than a "strong" reason for refusal.

NPPF para 11 | Presumption in Favour of Sustainable Development

For decision-taking this means: (c) approving development proposals that accord with an up-to-date development plan without delay; (d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless [specific exceptions apply].

Application: The proposed holiday accommodation at Lake 62 is, in principle, a sustainable use of land in a nationally important leisure destination. The positive policy support identified throughout this section indicates that the presumption in favour of sustainable development should operate powerfully in favour of granting outline permission.

Building a Strong, Competitive Economy, Paragraphs 85 to 89

- 3.2.3 Chapter 6 of the NPPF sets out the government's policy for building a strong, competitive economy. Paragraph 85 requires that significant weight be placed on the need to support economic growth and productivity, and that the approach taken should allow each area to build on its strengths. Paragraph 86 requires planning policies to set out a clear economic vision that positively and proactively encourages sustainable economic growth.
- 3.2.4 For the purposes of this application, the most directly relevant provision is paragraph 88, which addresses supporting a prosperous rural economy. Paragraph 88 establishes a positive, enabling framework for rural development, expressly including tourist accommodation.

NPPF para 88 | Supporting a Prosperous Rural Economy

Planning policies and decisions should enable: (a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings; (b) the development and diversification of agricultural and other land-based rural businesses; (c) sustainable rural tourism and leisure developments which respect the character of the countryside; and (d) the retention and development of accessible local services and community facilities.

Application: Paragraph 88(c) directly and expressly supports this application. The provision of up to 38 high-quality holiday units within an established leisure destination constitutes precisely the "sustainable rural tourism and leisure development" that this paragraph is designed to encourage. The outline application approach, with design reserved for Reserved Matters, ensures that the requirement to respect the character of the countryside can be fully satisfied at the detailed stage.

- 3.2.5 Paragraph 89 further provides that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. This is directly applicable to the application site, which lies outside the settlement boundary of Ashton Keynes but is well positioned within the established Cotswold Water Park leisure destination. Paragraph 89 reinforces that such locations are appropriate for tourism uses.

Achieving Well-Designed Places, Paragraph 135

- 3.2.6 Chapter 12 of the NPPF addresses design quality. Paragraph 135 requires planning policies and decisions to ensure that developments will function well and add to the overall quality of the area; are visually attractive as a result of good architecture, layout and appropriate landscaping; are sympathetic to local character and history including the surrounding built environment and landscape setting; and establish or maintain a strong sense of place.

NPPF para 135 | Achieving Well-Designed Places (extract)

Planning policies and decisions should ensure that developments: (a) will function well and add to the overall quality of the area... (b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; (c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change; (d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.

Application: Matters of layout, scale, appearance and landscaping are all expressly reserved in this outline application. The requirements of paragraph 135 will be addressed in full at the Reserved Matters stage. No adverse finding can properly be made on design grounds at outline stage where these matters are not before the decision maker. The previous refusal on design grounds (relating to shipping containers) is therefore not applicable to the present outline application.

Conserving and Enhancing the Natural Environment, Paragraphs 187 to 193

- 3.2.7 Chapter 15 addresses the natural environment. Paragraph 187 requires planning policies and decisions to protect and enhance valued landscapes, recognise the intrinsic character and beauty of the countryside, and minimise impacts on biodiversity while providing net gains.
- 3.2.8 Of direct relevance to this site is paragraph 189, which sets out the policy for National Landscapes (formerly designated as Areas of Outstanding Natural Beauty). Great weight must be given to conserving and enhancing landscape and scenic beauty. The scale and extent of development within these areas should be limited, and development within their setting should be sensitively located and designed to avoid or minimise adverse impacts.

NPPF para 189 | National Landscapes

Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

Application: Appropriate weight is given to the National Landscape designation in this application. However, two points are significant. First, paragraph 189 requires the scale and extent of development to be "limited", not precluded. A well-designed, low-density holiday accommodation scheme of 38 units on a 12-hectare site is commensurate with a limited scale of development. Second, this is an outline application with design reserved: the requirements of the National Landscape can be fully addressed through the Reserved Matters, including landscape integration, ecological enhancement and Biodiversity Net Gain.

- 3.2.9 Paragraph 190 addresses major development in National Landscapes and requires that, for such proposals, permission should be refused other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. This test applies to major development, and whether a proposal constitutes major development for this purpose is a matter for the decision maker considering the nature, scale

and setting of the proposal and whether it could have a significant adverse impact on the purposes of the designation (NPPF footnote 67). The applicant's position is that a scheme of up to 38 holiday units, on a 12-hectare site within the established Cotswold Water Park leisure destination, designed at a low density and with full landscape integration, does not constitute major development in the sense intended by paragraph 190. The evidence of demand, the economic benefits, and the site-specific justification set out in this Statement provide robust support in the event that the decision maker takes a different view.

- 3.2.10 Paragraph 193 sets out the test for SSSI development, requiring that development on land within or outside a SSSI which is likely to have an adverse effect on it should not normally be permitted, except where the benefits of the development clearly outweigh both its likely impact on the SSSI features and any broader impacts on the national network of SSSIs. The Ecological Impact Assessment submitted with this application addresses the SSSI in full and confirms that with appropriate mitigation, the proposal can avoid adverse effects on the SSSI designation features.

3.3 KEY FINDINGS, NPPF (DECEMBER 2024)

- Paragraph 88(c) of the December 2024 NPPF expressly supports sustainable rural tourism and leisure developments that respect the character of the countryside. This provision is the central national planning policy support for this application and establishes a strong presumption in favour of approval subject to the detailed design requirements being satisfied at Reserved Matters stage.
- Paragraph 85 requires significant weight to be placed on economic growth and productivity. The economic benefits of the proposed development, addressed in Section 7 of this Statement, weigh positively in the planning balance.
- Paragraph 89 confirms that sites for rural businesses may need to be found beyond existing settlement boundaries. This directly addresses the open countryside location of the application site, which lies outside the settlement boundary of Ashton Keynes but within the established Cotswold Water Park leisure destination.
- Paragraph 11 establishes the presumption in favour of sustainable development. The proposed use constitutes a sustainable use of land, positively supported by development plan policy. The presumption should operate in favour of granting permission.
- Paragraphs 135 and 189 impose design quality and National Landscape requirements, respectively. Neither creates a bar to permission at outline stage: design is expressly reserved, and the detailed landscape integration required by paragraph 189 will be addressed at Reserved Matters stage.

3.4 WILTSHIRE CORE STRATEGY (ADOPTED JANUARY 2015)

- 3.4.1 The Wiltshire Core Strategy (WCS), adopted by Wiltshire Council on 20 January 2015, is the principal development plan document for the application site. It provides the overarching planning policy framework for Wiltshire for the period to 2026. The relevant policies are set out below.

Spatial Strategy: Core Policies 1, 2 and 13

- 3.4.2 Core Policy 1 (Settlement Strategy) and Core Policy 2 (Delivery Strategy) establish that within settlement limits there is a presumption in favour of sustainable development, and that outside those limits development will not

be permitted except were allowed by other policies in the plan. Core Policy 13 applies the settlement strategy to the Malmesbury Community Area, within which the application site falls.

- 3.4.3 The application site lies outside the defined settlement boundary of Ashton Keynes and is therefore subject to the restrictive approach of Core Policies 1 and 2. However, Core Policies 39, 40, 48 and 54, considered below, each provide positive exceptions to this restrictive approach for appropriate forms of tourist and rural development.

Core Policy 39, Tourist Development

- 3.4.4 Core Policy 39 is the primary tourism policy in the Wiltshire Core Strategy and the most directly relevant policy for this application. It establishes that, outside Principal Settlements and Market Towns, tourist and visitor facilities should be located in or close to Local Service Centres or Large and Small Villages. The application site, on the edge of Ashton Keynes (a Large Village), is in close proximity to a Local Service Centre (Cricklade) and satisfies this locational requirement.
- 3.4.5 Core Policy 39 sets out a series of criteria, of which the following are most relevant to this outline application:

WCS Core Policy 39 (i)-(vii) | Tourist Development, relevant criteria

Development for camping and touring caravan sites will be supported where: (iii) the scale, design and use of the proposal is compatible with its wider landscape setting and would not detract from the character or appearance of the landscape or settlement and would not be detrimental to the amenities of residential areas; (iv) the building is served by adequate access and infrastructure; (v) the site has reasonable access to local services and a local employment base.

Application: Criterion (iii): Matters of scale, design, and use are expressly reserved in this outline application. No assessment of detailed design compatibility with the landscape can properly be undertaken until the Reserved Matters stage, when a full Landscape Visual Impact Assessment and design approach will be presented. The outline parameters establish a low-density scheme of up to 38 units on a 12-hectare site (approximately 3.2 units per hectare), which is entirely consistent with a landscape-sensitive development. Criteria (iv) and (v): Access is a matter for determination in this outline application, and the Transport Statement confirms adequate access. Cricklade is within convenient distance for local services.

Core Policy 40, Tourist Accommodation

- 3.4.6 Core Policy 40 addresses hotels, bed and breakfasts, guesthouses and conference facilities. While the primary focus of CP40 is serviced accommodation, its principles, that visitor accommodation makes an important contribution to the local economy, that a sufficient range of quality accommodation is needed, and that new provision should be accessible and of an appropriate scale and design, are material to the present application. The desirability of a sufficient and appropriate range of accommodation is a theme common to both CP39 and CP40.

Core Policy 48, Supporting Rural Life

- 3.4.7 Core Policy 48 addresses rural economic development more broadly, recognising that sustainable rural economic development is important to the health and vitality of rural communities. It supports development that will make a positive economic contribution to the rural economy whilst being sensitive to its environment

and local character. The proposed holiday accommodation development, as a source of visitor spend and local employment within the rural Cotswold Water Park setting, directly reflects the objectives of Core Policy 48.

Core Policy 54, Cotswold Water Park

- 3.4.8 Core Policy 54 is of particular importance as a site-specific policy that applies directly to this application. It recognises the Cotswold Water Park as a major leisure and recreation attraction in North Wiltshire and sets out a positive policy framework for appropriate development within it. CP54 supports development within the CWP where it meets a series of criteria, of which the following are most relevant:

WCS Core Policy 54 | Cotswold Water Park, relevant criteria

Development within the Cotswold Water Park will be supported where it: (i) increases public accessibility and enjoyment of the lakes for both residents and visitors; (ii) contributes to the local economy; (iii) strengthens the local landscape character and engenders a sense of place; (iv) contributes to improving biodiversity and the management of the SSSIs; (v) is of an appropriate scale and quality and does not lead to the unnecessary urbanisation of the open countryside.

Application: This application satisfies each of the relevant criteria of CP54. Criterion (i): A well-designed holiday destination on a private lake will increase public tourism benefit to the wider CWP economy. Criterion (ii): The economic impact evidence in Section 7 confirms a significant contribution to the local economy. Criterion (iii): The design of units is reserved for Reserved Matters, when this criterion will be fully addressed. Criteria (iv) and (v): The Ecological Impact Assessment addresses biodiversity and SSSI considerations. The outline parameters reflect an appropriately scaled, low-density scheme.

- 3.4.9 It is critical to note that the 2022 refusal identified failings under criteria (iii) and (v) of CP54, arising specifically from the industrial appearance and incongruous design of the proposed shipping containers. The present outline application does not involve any fixed design: all matters of appearance, layout and landscaping are expressly reserved. The design failure that drove the 2022 refusal simply cannot apply to an outline application.

Core Policy 51, Landscape

- 3.4.10 Core Policy 51 requires that development respect the locally distinctive character of settlements and their landscape settings, including important views and visual amenity. This requirement applies to the Cotswold Water Park landscape. The requirement of CP51 will be addressed in full through the Reserved Matters application, supported by a detailed Landscape Visual Impact Assessment, a landscape strategy, and appropriate design guidance. No adverse finding can properly be made under CP51 at outline stage with design matters reserved.

Core Policy 57, Ensuring High Quality Design and Place Shaping

- 3.4.11 Core Policy 57 requires a high standard of design for all new development, ensuring that it makes a positive contribution to its locality, that it responds to the local character, and that it would not harm the character of the area. It requires development to: (i) be well-designed and in keeping with the local character; (ii) not result in the loss of or unacceptable impact on key buildings, spaces or features; and (iii) make efficient use of land whilst taking account of the characteristics of the site and the local context.

- 3.4.12 Consistent with the position on CP51, no assessment of design quality can properly be made at outline stage where all design matters are reserved. CP57 will be a primary policy consideration at the Reserved Matters stage. The refusal of PL/2021/06229 on CP57 grounds was specifically because of the design of shipping containers, a circumstance that does not apply here.

3.5 KEY FINDINGS, WILTSHIRE CORE STRATEGY 2015

- Core Policy 39 (Tourist Development) provides positive support for tourist accommodation in the Cotswold Water Park setting. This application satisfies the locational requirements of CP39 by virtue of its position adjacent to Ashton Keynes (a Large Village) and in proximity to Cricklade (a Local Service Centre). The design criteria of CP39 cannot be assessed adversely at outline stage with design matters reserved.
- Core Policy 54 (Cotswold Water Park) is a site-specific policy that directly and positively supports appropriate development within the CWP. This application satisfies the economic, accessibility, and biodiversity criteria of CP54. The design criterion (iii) will be addressed at Reserved Matters stage. The design failure of the 2022 refusal was specific to the shipping container proposal and is not applicable to the present outline application.
- Core Policies 40 and 48 confirm the positive policy context for visitor accommodation and rural economic development, respectively. The proposed development makes a significant contribution to the rural economy, and the visitor accommodation offer of the Cotswold Water Park.
- Core Policies 51 and 57 impose design quality requirements that are properly matters for the Reserved Matters stage. No adverse finding under either policy can be made at outline stage where all design matters are reserved.
- The development plan as a whole, read collectively, confirms that holiday accommodation development within the Cotswold Water Park is an acceptable and positively supported land use, subject to meeting design and landscape criteria at the detailed stage.

3.6 EMERGING WILTSHIRE LOCAL PLAN (SUBMITTED NOVEMBER 2024)

- 3.6.1 The Wiltshire Local Plan Review (WLPR) was submitted to the Secretary of State for independent examination on 28 November 2024. It is a review and update of the adopted Wiltshire Core Strategy, setting out an updated planning policy framework for the period 2020 to 2038. The first stage of hearings (Duty to Cooperate) was held in June 2025. Stage 2 substantive policy hearings commenced in November 2025 and are ongoing at the time of this application.
- 3.6.2 As a submitted but not yet adopted plan, the WLPR carries emerging weight in the determination of planning applications. The weight to be given to emerging policies is a matter of judgement having regard to the stage of preparation, the extent to which there are unresolved objections, and the degree of consistency with the current NPPF.
- 3.6.3 The WLPR proposes an updated tourism policy that carries forward and develops the principles of Core Policy 39 of the adopted WCS. The emerging plan retains a positive approach to appropriate tourist accommodation in rural locations within the Cotswold Water Park, consistent with the national policy direction in paragraph 88 of the December 2024 NPPF. The emerging plan also gives greater emphasis to sustainable tourism, nature-based accommodation, and the economic contribution of the visitor economy, all of which are directly aligned with the proposed development at Lake 62.

- 3.6.4 The emerging plan is not yet adopted and does not constitute part of the statutory development plan. No adverse reliance should be placed on its unadopted provisions to resist an application that is already supported by the adopted plan and national policy. Any relevant emerging policies should be read as supporting material for the principle of the use, not as a basis for additional restrictions not present in the adopted plan.

3.7 KEY FINDINGS, EMERGING WILTSHIRE LOCAL PLAN (SUBMITTED 2024)

- The Wiltshire Local Plan Review was submitted for examination in November 2024 and is at Stage 2 hearings. It carries emerging but limited weight at this stage.
- The emerging plan retains positive support for appropriate tourist accommodation within the Cotswold Water Park, consistent with the adopted Core Strategy and the December 2024 NPPF. It places greater emphasis on sustainable, nature-based tourism, directly aligned with the Lake 62 proposal.
- The emerging plan does not create any new policy barriers to the proposed development that are not already present in the adopted plan, and the thrust of its tourism policies continues to support the principle of high-quality holiday accommodation in the CWP setting.

3.8 ASHTON KEYNES NEIGHBOURHOOD PLAN (MADE MAY 2017)

- 3.8.1 The Ashton Keynes Neighbourhood Plan (AKNP) was made by Wiltshire Council on 31 May 2017 following a successful referendum. It forms part of the statutory development plan for the application site, and its policies carry full weight.
- 3.8.2 The following policies of the AKNP are relevant to this application.

Policy ECP2, Use of Former Minerals Extraction and Manufacturing Sites

AKNP Policy ECP2 | Use of Former Minerals Extraction and Manufacturing Sites

Development within the Cotswold Water Park (as defined within the Wiltshire Core Strategy Policies Map) will be supported where it: (i) strengthens the Cotswold Water Park's landscape character and reinforces its sense of place; or (ii) maintains the character of settlements and their settings; and (iii) is consistent with the policies of the Wiltshire Core Strategy for the area.

Application: The application site is located within the Cotswold Water Park as defined on the policies map. The proposed development, at Reserved Matters stage, will be required to demonstrate how it strengthens the CWP landscape character and reinforces its sense of place, exactly as required by ECP2. This is precisely the kind of high-quality, purpose-designed holiday accommodation that ECP2 is intended to support. The 2022 refusal specifically noted that the shipping containers failed this test. The present outline application resolves that issue by reserving all design matters for a future Reserved Matters application where ECP2 will be fully addressed.

Policy HCP1, Local Character

- 3.8.3 Policy HCP1 of the AKNP requires that development styles, proportions, materials and finishes for new build and conversions must be in harmony with their surroundings, in particular when in close proximity to Listed Buildings and Scheduled Monuments. Policy HCP1 is a design policy. Consistently with the position on NPPF paragraph

135 and WCS policies CP51 and CP57, the requirements of HCP1 cannot be applied adversely at outline stage where all design matters are reserved. Full compliance with HCP1 will be demonstrated at the Reserved Matters stage.

Policy 3.8, Design and Access Statement

3.8.4 Policy 3.8 of the AKNP supports the requirement for a Design and Access Statement, setting out that development must achieve a high quality of design that is expected of development within the Cotswold Water Park. The accompanying Design and Access Statement addresses the aspirations of Policy 3.8 at outline stage, and the detailed design will be developed for Reserved Matters in full compliance with this policy.

Policy ENP3, Enhancing the Landscape Character of the Parish

3.8.5 Policy ENP3 seeks to protect and enhance the landscape character of the Parish and the tranquillity of its setting. New development should be responsive to the character of the area. Consistent with the position on other design-related policies, ENP3 will be fully addressed through the Reserved Matters landscape strategy.

3.9 KEY FINDINGS, ASHTON KEYNES NEIGHBOURHOOD PLAN (2017)

- Policy ECP2 directly supports development within the Cotswold Water Park where it strengthens the CWP's landscape character and reinforces its sense of place. The proposed holiday accommodation development, when brought forward at Reserved Matters stage with a high-quality design approach, directly satisfies this criterion. ECP2 is a positive, enabling policy for this application.
- Policies HCP1, Policy 3.8, and ENP3 are all design policies that cannot be applied adversely at outline stage. These policies will be fully addressed at the Reserved Matters stage and do not constitute a reason for refusal of this outline application.
- The AKNP as a whole reflects the community's aspirations for high-quality, well-designed development that respects and enhances the Cotswold Water Park setting. The present application, with its emphasis on high-quality holiday accommodation and full design flexibility at Reserved Matters, is aligned with those aspirations.

3.10 NATIONAL TOURISM STRATEGY AND GOVERNMENT POLICY

3.10.1 A number of national government tourism strategies and policy documents are relevant as material considerations supporting the principle of the proposed development.

The Government's Tourism Strategy and LVEP Framework

3.10.2 Following the DCMS Tourism Recovery Plan of June 2021, which set ambitious targets for the recovery and growth of UK tourism post-pandemic, the government has continued to develop a strategic framework for the visitor economy through the Local Visitor Economy Partnership (LVEP) programme, operated through VisitEngland. LVEPs are designed to provide strong local leadership and governance in tourism destinations, fostering strategic collaboration between local and national tourism agencies to drive growth and investment.

3.10.3 The LVEP framework represents the current operative national strategy for the visitor economy in England. It recognises the visitor economy as a major contributor to national economic growth, rural employment, and sustainable place-making. The programme encourages investment in high-quality visitor accommodation as a

cornerstone of a competitive and resilient destination offer, directly consistent with the proposed development at Lake 62.

VisitBritain Strategy and Domestic Tourism

3.10.4 VisitBritain is the national tourism agency, funded by the Department for Culture, Media and Sport. Its strategic direction, reinforced through the LVEP programme, continues to champion the growth of domestic short-break tourism in regional England, the expansion of self-catering and experiential accommodation supply, and the development of nature-based and activity-led visitor experiences. All three themes are directly represented in the proposed development at Lake 62. The evidence in Sections 4 and 5 of this Statement demonstrates how this application responds to national tourism priorities.

3.11 KEY FINDINGS, NATIONAL TOURISM POLICY AND STRATEGY

- The government's current tourism strategy, delivered through the LVEP framework and VisitEngland, recognises the visitor economy as a major national economic priority and actively encourages investment in high-quality accommodation, particularly in rural and nature-based destinations.
- National tourism strategy supports the growth of domestic short-break tourism, the expansion of self-catering accommodation, and the development of nature-based leisure experiences, all of which are directly addressed by the proposed development at Lake 62.

3.12 REGIONAL AND LOCAL TOURISM STRATEGIES

Cotswolds Tourism Destination Management Plan 2022-2025

- 3.12.1 Cotswolds Tourism produced a Destination Management Plan (DMP) for the period 2022 to 2025. The DMP establishes a vision for tourism in the Cotswolds: "To ensure that the Cotswolds is a vibrant year-round destination where visitors enjoy high quality, authentic experiences and tourism makes an increasing contribution to the economic, social and environmental sustainability of the local economy."
- 3.12.2 The DMP sets out six priority themes for action: sustainability, partnership, product and visitor experience, marketing, knowledge and data, and performance. Within the product theme, the DMP specifically identifies the need to develop and diversify the visitor accommodation offer, attract new and distinct product types, and support investment in high-quality experiences that extend visitor dwell time and spend. The proposed development at Lake 62 directly addresses these priorities by introducing a new high-quality, nature-led visitor accommodation offer into the western Cotswold Water Park.
- 3.12.3 A new Destination Tourism Growth and Management Plan for the Cotswolds Plus LVEP area was formally tendered in February 2026, to replace and update the 2022-25 DMP. This commission, confirmed on the government's Find a Tender service, reflects the ongoing strategic commitment to investment-led growth of the Cotswolds visitor economy. The proposed development at Lake 62 is precisely the form of investment that this emerging plan is designed to support.

VisitWiltshire and the Local Visitor Economy Partnership

- 3.12.4 VisitWiltshire is the official destination management organisation for Wiltshire and, following formal accreditation, is now the designated Local Visitor Economy Partnership (LVEP) for Wiltshire. LVEP status was

secured in partnership with Wiltshire Council, which provided a formal letter of support to VisitEngland. Wiltshire Council's own statement on forming the LVEP made clear its commitment to "sustainable tourism and community prosperity" and to ensuring "Wiltshire remains a top destination for visitors from across the UK and beyond."

- 3.12.5 VisitWiltshire promotes the Cotswold Water Park (increasingly marketed as Cotswold Lakes) as one of Wiltshire's major visitor destinations, featuring watersports, lakeside accommodation, cycling, wildlife watching, and village exploration. The proposed development at Lake 62 adds a new premium offer to the western section of the Park, directly contributing to VisitWiltshire's objectives for the county's visitor economy.
- 3.12.6 Consultation with VisitWiltshire's Chief Executive confirmed that the current Destination Management Plan, though from 2015, still provides the relevant tourism vision, strategy and identified action for the sector, seeking sector growth and recognising that Wiltshire needs to attract more visitors, especially high-spending short break visitors, and that given the shortages of accommodation capacity identified in the Visitor Accommodation Study (see below), more accommodation is needed for excess peak demand and a greater range to attract year round markets and reasons to visit to help make the investment case. The Lake 62 proposals will help to meet this identified need, attract higher spend and more value, diversify the current offer and help attract new, tear-round markets.
- 3.12.7 More specifically on target markets, the DMP identifies the importance of 2 main leisure markets: mature mainstreams and experience seekers. Both are staying visitor markets that can travel year-round, deliver high value and look for quality accommodation. Mature mainstreamers are baby boomers from higher socio-economic groups, are growing in number, take multiple trips per year and need quality accommodation in the countryside plus authentic experiences. Experience-seekers are high consumers of trips and the highest spending domestic segment. They are aged 35-54 without children, and travel as couples or with same sex friends, they are affluent and look for distinctive accommodation and activities. The family market is also an identified existing segment, including boomer grandparents and vertical families. Again, the proposition at Lake 62 would appeal to all three target markets.
- 3.12.8 In 2025, Wiltshire Council agreed to initiate the development of a new Destination Management Plan for Wiltshire as part of its LVEP programme. This forward-looking strategic commitment further reinforces the policy context in favour of investment in quality visitor accommodation in Wiltshire, including in the Cotswold Water Park.

Hotel Solutions, Wiltshire and Swindon Visitor Accommodation Futures Study (2014)

- 3.12.9 The Wiltshire and Swindon Visitor Accommodation Futures Study, prepared by Hotel Solutions for VisitWiltshire and the Swindon and Wiltshire Local Enterprise Partnership in 2014, remains the only independent strategic assessment of visitor accommodation need across the county. This study, prepared by the same consultancy commissioned to undertake the Stage 1 appraisal for Lake 62, identified a clear strategic gap in the supply of high-quality, nature-immersive holiday lodge accommodation in Wiltshire, and specifically identified the Cotswold Water Park as the premier opportunity location for new lodge development. Its findings carry direct material weight for this application. Its recommendations also called for more positive planning policies for hotel and visitor accommodation to attract investment.

3.13 KEY FINDINGS, REGIONAL AND LOCAL TOURISM STRATEGIES

- The Cotswolds Tourism Destination Management Plan 2022-25 sets a clear strategic vision for high-quality, authentic visitor experiences and identifies the diversification of accommodation as a priority. The proposed development at Lake 62 directly delivers this vision within the Cotswold Water Park.
- A new Cotswolds Plus LVEP Destination Tourism Growth and Management Plan was tendered in February 2026, reflecting the ongoing and active strategic investment in the Cotswolds visitor economy at the national and regional level.
- VisitWiltshire, as the accredited LVEP for Wiltshire, actively promotes the Cotswold Lakes as a major tourism destination. The current DMP identifies a need for additional visitor accommodation to enable growth in the visitor economy, to cater for denied business at times of peak demand, and to attract new year-round markets especially from high spending markets. Wiltshire Council's formal support for the LVEP and its commitment to developing a new Destination Management Plan for Wiltshire confirm that investment in high-quality visitor accommodation is a strategic priority at the county level.
- The Hotel Solutions Wiltshire and Swindon Visitor Accommodation Futures Study (2014) identified a strategic gap in lodge accommodation supply in Wiltshire, with the Cotswold Water Park singled out as the principal opportunity location. This finding, from the same consultancy responsible for the Stage 1 appraisal, carries direct material weight in support of this application. It also recommends more positive planning policies for hotel and visitor accommodation development to attract investment.

3.14 WILTSHIRE COUNCIL POLICY PRIORITIES

- 3.14.1 A new administration within Wiltshire Council has brought a renewed drive for economic growth and positive support for the growth of the visitor economy.
- 3.14.2 The Liberal Democrat 2025 Manifesto made a clear commitment to tourism as part of its Business and Enterprise priority, leading a renewed effort to attract investment and support Wiltshire businesses. This included re-establishing relationships with Visit England and setting up a new LVEP led by VisitWiltshire to promote tourism and build capacity in the sector, alongside convening a Tourism Forum for joined up working and to maximise exposure nationally and internationally.
- 3.14.3 This support has been further developed through the Council Plan – Our Wiltshire Plan 2025-2035 – where tourism is identified as one of 6 priority sectors for growth. The creation of the LVEP is seen as a major step forward in strengthening the county's £1.5bn visitor economy, an initiative that complements the broader economic strategy and reinforces the commitment to sustainable tourism and community prosperity.
- 3.14.4 A priority around culture also links to the visitor economy, promoting cultural development for visitors to enjoy and opportunities to take part in a range of activities – walking, cycling and watersports as well as nature-based activities are all relevant to the Lake 62 site.

3.15 OVERALL POLICY CONCLUSION

- 3.15.1 Taken in the round, the planning policy framework strongly supports the principle of high-quality holiday accommodation development at Lake 62 in the Cotswold Water Park. The following conclusions flow from the analysis above.

- 3.15.2 At the national level, paragraph 88(c) of the NPPF (December 2024) expressly supports sustainable rural tourism and leisure developments that respect the character of the countryside. The presumption in favour of sustainable development (paragraph 11) operates in favour of approving this application. The rural economy policies (paragraphs 85, 89) reinforce the acceptability of the site's open countryside location within the established leisure destination. The design requirements (paragraph 135) and National Landscape policies (paragraphs 189 to 190) impose requirements that are properly addressed at the Reserved Matters stage, not at outline.
- 3.15.3 At the development plan level, Core Policy 39 supports tourist development in the Cotswold Water Park context; Core Policy 54 provides a specific and positive policy framework for appropriate development within the CWP; Core Policies 40 and 48 confirm the desirability of quality visitor accommodation and rural economic development; and Ashton Keynes Neighbourhood Plan Policy ECP2 directly supports development that strengthens the CWP's landscape character and sense of place. No policy in the development plan constitutes a bar to outline permission where design is reserved.
- 3.15.4 At the tourism policy level, there is clearly a renewed political commitment by the Council to grow and develop the visitor economy, and evidence that more accommodation is needed to achieve this aim, cater for the excess of demand over supply at peak periods, and introduce a more diverse, high quality accommodation offer to attract new high spending markets year-round.
- 3.15.5 The only reason the 2022 application was refused was the specific design of shipping containers (addressed at this outline stage by reserving all design matters) and the absence of demand evidence. This Statement directly and comprehensively addresses the demand evidence requirement, as set out in Sections 4 to 6. The applicant is therefore confident that this outline application, assessed against the policies of the development plan and the NPPF taken as a whole, should be approved.

4 THE COTSWOLD WATER PARK AS A TOURISM DESTINATION

4.1 ORIGIN AND FORMATION OF THE DESTINATION

- 4.1.1 The Cotswold Water Park is one of England's largest inland water recreation areas. Its origins lie in the intensive sand and gravel extraction industry that operated across the Upper Thames Valley from the 1920s onwards. As extraction progressively ceased across individual lake basins, the resulting freshwater lakes were retained, managed, and progressively developed for recreation, wildlife conservation, and tourism. Today the area comprises over 180 lakes across approximately 42 square miles of Wiltshire and Gloucestershire countryside, forming a complex mosaic of open water, wetland, lowland meadow, and riparian habitat that is unique in the English landscape.
- 4.1.2 The Cotswold Water Park Trust, the charity responsible for the conservation, management, and promotion of the area, formally approved the rebranding of the Cotswold Water Park to "Cotswold Lakes" in September 2024, with the new name taking official effect from 29 March 2025, the date of the first "Cotswold Lakes Day" event. The rebranding was designed to address longstanding visitor misconceptions created by the word "Park", which led many prospective visitors to anticipate a commercial theme park offering rather than the area's genuine character as a biodiversity hotspot, a landscape for active outdoor recreation, and a high-quality holiday destination. Throughout this Statement, both names are used interchangeably. The change in name does not alter any planning policy designation and the area continues to be referred to as the Cotswold Water Park in the applicable development plan policies.
- 4.1.3 The ecological importance of the area is reflected in its designation as a Site of Special Scientific Interest (SSSI), recognised for the exceptional quality of its wetland habitats, including nationally significant populations of wintering and breeding waterbirds. The lakes are reported to support in excess of 35,000 wintering birds annually, and the area is a critically important part of the national network of wetland habitats. This ecological richness is not merely a planning constraint; it is one of the primary assets that drives visitor demand and underpins the premium value of holiday accommodation in this location.

4.2 SCALE, CHARACTER AND VISITOR OFFER

- 4.2.1 The Cotswold Lakes is an established, multi-activity outdoor recreation and tourism destination offering a visitor experience that is broadly unmatched in the inland lowland English countryside. The breadth of activities available across the destination includes:

Water Activities	Land Activities	Wildlife and Nature	Cultural and Leisure
Sailing, windsurfing, canoeing, kayaking, SUP, waterskiing, wakeboarding, open water swimming, boat hire, fishing	Cycling (extensive off-road trail network), walking (Thames Path National Trail adjoins the area), horse riding, golf	Birdwatching (35,000+ wintering birds), wildflower meadows, wetland ecology, nature reserves	Cotswold market towns (Cirencester, Cricklade, Malmesbury), village pubs and restaurants, arts and heritage

- 4.2.2 This combination of water-based, nature-based, and cultural activities creates a destination with year-round visitor appeal. Watersports and open water activities drive peak summer demand, while birdwatching, cycling, walking, and the nearby Cotswold towns sustain visitor interest across the shoulder and off-peak seasons. The VisitWiltshire Visitor Centre is located on the Spine Road within the grounds of the De Vere Cotswold Water Park

Hotel and is open throughout the year, providing visitor information, leisure maps, and guided tours of the area, a material indicator of the level of visitor activity and management investment that the area attracts.

- 4.2.3 The destination's standing in the national tourism market is confirmed by the Cotswolds visitor satisfaction score. Research produced by Avison Young for the purposes of the Tourism Need Assessment (December 2022), drawing on VisitEngland's Destination Tracker data, found that the Cotswolds achieved a visitor satisfaction index score of 100, on a par with London, the Isle of Wight, and the Yorkshire Dales, and materially above the England average of 94. The Cotswolds also recorded a 3% higher share of "loyal" visitors than comparable rural destinations and 8 to 9% more "considerers", visitors who actively planned to visit, against both the GB rural countryside average and the GB destination average. Only 15% of the public surveyed stated they would be unlikely to holiday in the Cotswolds, well below the comparator benchmarks.

4.3 THE REBRANDING TO COTSWOLD LAKES AND DESTINATION EVOLUTION

- 4.3.1 The rebranding of the area to Cotswold Lakes in March 2025 is materially relevant to this application. It reflects a deliberate strategic repositioning of the destination away from a primarily commercial, activity-park identity and towards a nature-led, landscape-immersive, premium leisure and wellbeing destination. The Cotswold Lakes Trust's stated rationale for the change was to better communicate the area's "true character as a biodiversity hotspot" and its suitability for "hiking, fishing, kayaking, and wildlife observation in a serene ecosystem."
- 4.3.2 This repositioning is directly aligned with the type of development proposed at Lake 62. A high-quality, nature-led holiday accommodation scheme on a privately owned lake within the western Cotswold Lakes is entirely consistent with the destination identity that the Trust, VisitWiltshire, and the wider tourism management community are actively seeking to develop and promote. The private lake at Lake 62 represents exactly the kind of nature-immersive, water-centred, calm and secluded experience that the rebranded Cotswold Lakes destination is designed to offer.

4.4 NOTED EXISTING ACCOMMODATION SUPPLY

- 4.4.1 The Cotswold Water Park hosts a significant and varied base of visitor accommodation, developed progressively since the 1980s as extraction activities ceased. The established supply includes several major operators and a significant number of smaller independent units. The principal accommodation providers are summarised below.

Operator / Property	Type	Scale	Notes
Lower Mill Estate	Luxury self-catering lodges, architect-designed	c.575 holiday homes (consented)	550-acre estate across multiple lakes; five-star quality; frequently cited as the benchmark premium CWP product; operated by Habitat Escapes.
Watermark (Spring Lake, Landings, Isis & Windrush)	New England-style holiday lodges, lakeside	c.210+ units across three lakes	High-end; majority managed by Orion Holidays; some owner-occupied with letting. Spring Lake has brasserie and gym. Consistently strong occupancy reported.

Hoburne Cotswold	Holiday caravans; lodge static caravans	c.350+ pitches	Established mid-market holiday park. Planning permission granted for 92 additional holiday lodge caravans. Demonstrates mid-market demand in the immediate locality.
Log House Holidays	Luxury log cabin lodges	8 units	Private 130-acre nature reserve. Achieved highest local occupancy rates reported by Avison Young (2022): fully booked until February 2023 at time of survey, from £375/night (4-night minimum).
Little Horseshoe Lake	Architect-designed self-catering lodges	5 units	Private fishing lake within the CWP. Adults-only. Achieving £380-£500/night peak (Hotel Solutions, March 2026). Direct product archetype for the premium element of the proposed development.
Cherry Lakes	Fishing lodges	6 units	Year-round fishing holiday focus. Demonstrates specialist demand.
De Vere Cotswold Water Park Hotel	4-star hotel	c.330 bedrooms	Located on Spine Road. Includes spa, meeting facilities and leisure centre. Represents the serviced accommodation end of the CWP market.
Orion-managed portfolio (Waters Edge, Howells Mere, Clearwater etc)	High-end self-catering cottages and lodges	c.200+ units	Orion Holidays manages the largest single letting portfolio in the CWP. Occupancy reported at 80% in recent years, against a target of 75-77%.

4.4.2 The total managed holiday accommodation base within the Cotswold Water Park is estimated by Orion Holidays at 1,800 units, though not all are offered for holiday letting at any given time. The supply is heavily weighted towards the premium and super-premium end of the market (Lower Mill Estate, Watermark, Orion-managed properties) and the budget holiday park end (Hoburne). The mid-market lodge product, well-designed, lakeside, offering genuine private water access at a price accessible to the family and short-break markets, remains in structurally short supply, a conclusion supported by operator intelligence (see Section 5) and confirmed by Hotel Solutions in both their 2014 Futures Study and their 2026 Stage 1 appraisal for this site.

4.4.3 The west-CWP area in which Lake 62 is located, the Wiltshire side, accessed from the B4696 Spine Road West, is notably less commercially developed than the Gloucestershire lakes to the east. This creates both a planning context more amenable to new development and a visitor experience advantage: relative seclusion and tranquillity, within the same destination catchment. Hoseasons confirmed that they have "a low provision of lodges in the region," that their promotional material "does not have a lodge section dedicated to the Cotswolds," and that "the area is crying out for a lodge product."

4.5 VISITOR PROFILE AND CATCHMENT

4.5.1 The Cotswolds as a destination draws visitors primarily from the South East, Greater London, and the West Midlands. Research produced by VisitEngland's Destination identified that the top three regions of visitor origin for the Cotswolds were Greater London (17%), the South East (17%), and the West Midlands (12%). This catchment is directly relevant to the Lake 62 site, which sits on the M4 corridor connecting London and the Home

Counties to the western Cotswolds, a route that positions the site as ideally accessible for the largest and most affluent segments of the Cotswolds visitor market.

4.5.2 Demographic analysis of the drive-time catchment found that the resident population within a two-hour drive of this location reaches approximately 16 million. Critically, the social grade profile of the catchment is materially more affluent than the national average: AB (higher and intermediate managerial, professional) social grade representation exceeds the index by at least 13% within the 30-to-90-minute drive time band, the core short-break catchment for this type of accommodation. This demographic profile directly underpins the viability of a high-quality, premium holiday accommodation offer at Lake 62.

4.5.3 In terms of trip motivation, the lead demand in the Cotswold Water Park is not primarily driven by main annual holidays but by second, third, and fourth short breaks taken throughout the. This is a structurally advantageous demand profile: short-break visitors generate a higher spend per night than week-long visitors, they are distributed more evenly across the calendar, and they are the growing segment of the domestic market. The CWP's position within two hours of 16 million people makes it ideally suited to the short-break model.

4.6 STRATEGIC SIGNIFICANCE FOR THIS APPLICATION

4.6.1 The established character of the Cotswold Water Park as a proven, nationally significant tourism destination is directly relevant to the planning case for this application. The site is not a proposal for holiday accommodation in an isolated or undeveloped countryside location where there is no visitor economy or visitor infrastructure. Rather, it is a proposal to add a high-quality accommodation product to a destination that already receives substantial visitor numbers, supports multiple existing accommodation operators, is actively promoted by VisitWiltshire as a major attraction, and benefits from the strategic and operational support of the Cotswold Lakes Trust.

4.6.2 This is precisely the context in which NPPF paragraph 88(c) is designed to operate: sustainable rural tourism and leisure developments that respect the character of the countryside are not limited to destinations without any existing tourism activity. On the contrary, adding accommodation capacity to an established, high-performing destination where supply is known to be constrained is exactly the kind of development that the paragraph was intended to support.

4.6.3 The site's position in the western CWP, with its private lake, Spine Road frontage, proximity to Ashton Keynes, and Thames Path access, places it at the point in the destination where new accommodation supply would both command the strongest market and cause the least landscape and community harm. The Stage 1 appraisal by Hotel Solutions and Forward Land (March 2026) confirms that the private lake is "the defining competitive advantage" for this site and positions it as capable of delivering a product entirely distinct from the existing supply, not replicating what is already on offer, but introducing something genuinely new to the Cotswold Lakes market.

4.7 KEY FINDINGS, SECTION 4

- The Cotswold Water Park, now officially rebranded as "Cotswold Lakes" from 29 March 2025, is one of England's largest and most ecologically significant inland water recreation areas, comprising over 180 lakes across 42 square miles of Wiltshire and Gloucestershire countryside. Its visitor satisfaction score of 100, on a par with London and the Yorkshire Dales, places it among England's premier rural tourism destinations.

- The destination supports a diverse and well-established visitor economy including an estimated 1,800 accommodation units (Orion Holidays, 2022), multiple nationally known operators, and a rich programme of water-based, nature-based, and cultural visitor activities. VisitWiltshire actively promotes the Cotswold Lakes as one of Wiltshire's primary tourism destinations.
- The rebranding to Cotswold Lakes in 2025 reflects a strategic repositioning of the destination towards a nature-led, landscape-immersive, wellness-oriented identity, precisely aligned with the type of premium holiday accommodation proposed at Lake 62.
- The two-hour drive time catchment encompasses approximately 16 million people (Hotel Solutions, 2026), drawn primarily from Greater London, the South East, and the West Midlands, an affluent, professionally qualified population that directly underpins demand for high-quality short-break accommodation in this destination.
- Despite the maturity of the market, the CWP has a structural gap in mid-to-premium private lake accommodation at a boutique scale, a gap specifically identified by Hotel Solutions (2026), Hoseasons (2022), Orion Holidays (2022) and the Hotel Solutions Wiltshire Futures Study (2014). The Lake 62 site, with its private 7ha lake, is uniquely positioned to address that gap.

5 EVIDENCING DEMAND: THE SELF-CATERING MARKET

5.1 INTRODUCTION AND EVIDENCE FRAMEWORK

- 5.1.1 This section presents the evidence of demand for self-catering holiday accommodation relevant to Lake 62. The proposed development is for high-quality, self-catering holiday units in a distinctive lakeside and nature-led setting. The evidence in this section is therefore focused squarely on the self-catering sector.
- 5.1.2 The evidence is presented in three parts: first, the current state and trajectory of the domestic tourism sector overall, and the durable consumer trends that favour this type of accommodation; second, the regional and local demand position, anchored in the authoritative strategic assessment of visitor accommodation need in Wiltshire; and third, the market data and performance evidence which demonstrates, clearly and at every geographic level, that demand for self-catering holiday accommodation continues to grow and that new accommodation supply is being absorbed by that growing demand.
- 5.1.3 All data presented in this section is drawn from current sources, the majority published in 2025 and 2026. Where an earlier source is referenced, it is because it represents the authoritative strategic assessment for the area and has not been superseded.

5.2 THE DOMESTIC TOURISM SECTOR: CURRENT SENTIMENT AND TRAJECTORY

A Sector That Has Rebounded and Consolidated

- 5.2.1 The domestic tourism sector experienced an exceptionally strong rebound in the years immediately following the pandemic, as restrictions on overseas travel and a surge in consumer appetite for domestic breaks drove record demand. As overseas travel normalised, the sector moved from that initial surge into a phase of consolidation at a level materially above its pre-pandemic baseline, with the underlying value of the market continuing to grow.
- 5.2.2 The value data tells the most important story, and it is unambiguously positive. **In 2024, domestic overnight visitors spent £32.9 billion on trips within Great Britain, up 5% on 2023.** The average spend per overnight trip rose to £312, a 17% increase on 2023, and the average spend per night reached £107, up 16% year-on-year (VisitBritain, Great Britain Tourism Survey 2024, published March 2025). Visitors are spending more and spending it on higher-quality experiences. This is the single most important macro-trend for a premium accommodation proposal, and it runs firmly in the proposal's favour.

£32.9bn	£312	£107
GB domestic overnight tourism spend in 2024, up 5% on 2023 (VisitBritain GBTS 2024)	Average spend per overnight trip in 2024, up 17% year-on-year (VisitBritain GBTS 2024)	Average spend per night in 2024, up 16% year-on-year (VisitBritain GBTS 2024)

Sentiment and Forward Momentum

- 5.2.3 Current sentiment data confirms that the domestic holiday remains firmly embedded in British consumer behaviour. VisitBritain's Domestic Sentiment Tracker recorded that, in early 2026, around three-quarters of UK adults intended to take a domestic overnight trip in the following twelve months, and the proportion of

consumers cutting the number of their domestic trips owing to cost-of-living pressures had fallen to its lowest level since tracking began in 2022. The structural appetite for domestic holidays is durable and the cost-of-living drag on that appetite is easing.

- 5.2.4 Forward-booking data for the current year reinforces this. Sykes Holiday Cottages, the UK's largest self-catering letting agency, reported in January 2026 that **bookings made that month were up 9% year-on-year**, describing "unprecedented levels of demand for UK holidays at this early stage of the year" and predicting 2026 would be "one of the strongest years for domestic tourism we've ever seen." Sykes also confirmed that 2024 had been its biggest-ever year for bookings, with a 2.2% year-on-year increase. This is direct, current commercial booking data from the largest operator in the sector, and it points clearly to sustained and strengthening demand.

Consumer Trends That Favour Lake 62 and Are Here to Stay

- 5.2.5 Beyond the headline numbers, the qualitative direction of consumer demand has shifted decisively towards the type of experience that Lake 62 is designed to offer. The market research consistently characterises these as structural, durable shifts rather than transient fashions.

Consumer Trend	What the Evidence Shows	Relevance to Lake 62
Nature-based and restorative stays	Mintel (2025) reports rising demand for country cottages, wellness breaks and "slow travel" as consumers seek restorative staycations amid economic and technological uncertainty.	A private lake within an SSSI and National Landscape is a genuine restorative, nature-immersive setting.
Quality over quantity	Mintel Luxury Travel (2025): affluent consumers are taking shorter but higher-value trips, prioritising "meaningful luxury and indulgent escapes" and unique, exclusive, relaxing experiences.	A distinctive lakeside product is precisely the "unique and exclusive" experience this segment seeks.
Trading up	RSM (2025) records a clear reversal of the 2023 budget-led market, with travellers "trading up" to mid-market and luxury options as financial confidence returns.	Supports a premium pricing position rather than a budget, volume offer.
Active and special-interest leisure	Mintel (2025): younger generations prioritise leisure spend and seek diverse "active leisure" breaks including adventure and special-interest holidays.	Watersports, fishing, cycling, walking and wildlife directly serve this demand.
Sustainability and authenticity	Mintel (2025) and Savills (2025) both identify sustainability credentials and authentic, experience-led stays as increasingly decisive booking factors, especially for higher-value guests.	A nature-led, biodiversity-rich scheme can authentically deliver these credentials.

- 5.2.6 The significance of these trends is that they are mutually reinforcing and all point in the same direction: towards distinctive, high-quality, nature-led, experience-rich accommodation. The proposed development at Lake 62 sits squarely on the favourable side of every one of them.

5.3 REGIONAL AND LOCAL DEMAND

- 5.3.1 The national picture is strongly corroborated at the regional and local level. The authoritative strategic assessment of visitor accommodation in the county is the Wiltshire and Swindon Visitor Accommodation Futures Study, prepared by Hotel Solutions for VisitWiltshire and the Swindon and Wiltshire Local Enterprise Partnership. It remains the only independent, strategic-level assessment of visitor accommodation need across Wiltshire, has not been superseded by any subsequent strategic study, and its conclusions continue to carry material weight. It is referenced here for its strategic findings and forward-looking conclusions.
- 5.3.2 Hotel Solutions authored the study. This continuity is significant: the consultancy that produced the county's definitive strategic accommodation assessment has independently confirmed, more than a decade later, that the opportunity it identified remains live and unmet at this specific site.

The Futures Study's Findings and Forward Projections

- 5.3.3 The Futures Study identified that Wiltshire was lagging behind competing destinations in the provision of contemporary self-catering and lodge accommodation, and that the county needed more of this type of accommodation if it were to compete effectively and capture markets that were going elsewhere. Critically for the present application, it looked forward and identified clear future potential and requirement for additional high-quality self-catering lodge accommodation, singling out the Cotswold Water Park as a prime opportunity location for exactly this form of development.

"Wiltshire is lagging behind other destinations in terms of the development of luxury country house hotels; golf resorts; boutique hotel, B&B and self-catering accommodation; and contemporary holiday lodge accommodation... The county needs more of these types of accommodation if it is to compete successfully in the future and attract new markets that are currently going elsewhere."

Wiltshire and Swindon Visitor Accommodation Futures Study, Hotel Solutions for VisitWiltshire and the Swindon and Wiltshire LEP

- 5.3.4 The study further identified good potential for additional holiday lodge accommodation in Wiltshire and rural Swindon, and found that existing high-quality self-catering and lodge operators in the county were achieving strong occupancies, particularly during the main season and at weekends, with demand at peak periods exceeding available supply. The strategic conclusion was unambiguous: there was a clear, evidenced future requirement for additional contemporary self-catering and lodge accommodation in Wiltshire, and the Cotswold Water Park was identified as a leading location to meet it.
- 5.3.5 The importance of these findings lies in what has, and has not, happened since. The strategic requirement the Futures Study identified was not subsequently met by any significant new supply of the type it called for in the western Cotswold Water Park. **More than a decade on, the gap the county's definitive strategic study identified remains substantially unfilled, and this remains unfilled today.** The forward requirement has, in effect, been carried forward unmet, and this application is a direct and timely response to it.

An Affluent and Substantial Catchment

5.3.6 The regional demand position is underpinned by the site’s catchment. As set out in Section 4, the Stage 1 Appraisal confirms a resident population of approximately 16 million people within a two-hour drive time of the site, drawn principally from Greater London, the South East, and the West Midlands. This catchment is notably more affluent than the national average, with the AB social grade (the group with the highest propensity to take short breaks) over-represented relative to the national index across the core catchment. This combination of scale and affluence is precisely the demand base required to support a premium self-catering proposition.

5.4 MARKET DATA AND PERFORMANCE: GROWING DEMAND IS ABSORBING NEW SUPPLY

5.4.1 This sub-section presents the core market evidence, and makes a single, simple, and powerful point. As new self-catering accommodation supply has come onto the market over recent years, the number of occupied guest nights has continued to grow. New inventory has not displaced existing bookings; it has been absorbed by a growing market. This is the clearest possible evidence that demand for self-catering holiday accommodation is real, sustained, and still expanding, and that the introduction of new accommodation, such as that proposed at Lake 62, is supported by, rather than in conflict with, the direction of the market. The point holds true and consistently at the national, regional, and local level.

National Level: Record Guest Nights Even as Supply Grows

5.4.2 The most authoritative measure of occupied demand in this sector is published by the Office for National Statistics, which since 2023 has produced official statistics on guest nights spent in short-term lets across the UK. The most recent bulletin (published 28 November 2025) records that **in the twelve months to June 2025 there were 93.8 million guest nights spent in short-term lets in the UK, an increase of 10.2% on the 85.2 million guest nights recorded in the previous twelve-month period.** In England specifically, guest nights grew by 10.8%. This growth in occupied guest nights occurred during a period in which the supply of short-term rental listings was also expanding across every region of the UK. In other words, the market added new supply and simultaneously grew the number of occupied nights: demand absorbed the new inventory and continued to grow.

93.8m	+10.2%	+10.8%
UK short-term let guest nights, year to June 2025, up from 85.2m the previous year (ONS, Nov 2025)	Growth in UK occupied guest nights year-on-year, achieved while supply was also growing (ONS, Nov 2025)	Growth in occupied guest nights in England specifically, year to June 2025 (ONS, Nov 2025)

5.4.3 This is a critical point for the determination of this application. A common and superficial objection to new visitor accommodation is that additional supply will simply dilute occupancy across the existing stock. The official national data demonstrates that this is not what has happened. Over the most recent period for which data is available, supply grew and occupied guest nights grew alongside it, reaching record levels. The market is characterised by independent analysts as one of "structural demand, not a speculative bubble" (industry analysis citing ONS data, 2026). New, well-conceived accommodation is being absorbed by genuine and growing demand.

Regional Level: Growth Across Every English Region

- 5.4.4 The same pattern holds at the regional level. The ONS data confirms that **occupied guest nights grew across every English region in the year to June 2025**, with increases ranging from 5.8% in the South East to 17.0% in the East Midlands. No English region saw a decline in occupied guest nights. This regional consistency is important: the growth in demand is not a localised phenomenon confined to a single honeypot destination, but a broad-based, structural feature of the domestic self-catering market across England, including the regions that form the core catchment for Lake 62.
- 5.4.5 Independent commentary confirms that, within this regional growth, it is precisely the rural and countryside destinations of the type represented by the Cotswold Water Park that are performing most strongly. Market analysis published in 2025 noted that "well-located holiday cottages and rural retreats (for example coastal Wales, the Cotswolds) are still doing very well," in contrast to oversaturated city-centre markets. The growth in occupied demand is concentrated in exactly the kind of rural, experience-led destination within which the proposed development sits.

Local Level: The Cotswold District Market Absorbs Supply and Grows

- 5.4.6 The decisive evidence is at the local level, in the specific market within which Lake 62 sits. The Cotswold District self-catering market has seen substantial growth in supply over the past year, and that new supply has been accompanied by continued growth in revenue and pricing, not by dilution. This is the single clearest demonstration that demand in this specific market is outpacing the introduction of new inventory.
- 5.4.7 Independent short-term rental market analysis of the Cotswold District (AirROI, 2026 dataset, covering April 2025 to March 2026) records that **the supply of listings in the Cotswold District grew by 32.2% over the year, and yet revenue and nightly rates both continued to trend upward over the same period.** The analysis draws the explicit conclusion that this is "a signal that traveller demand is outpacing new inventory rather than being diluted by it," and that "for hosts, pricing power remains intact even as competition increases." A market that can absorb a 32% increase in supply in a single year while maintaining and growing pricing is, by definition, a market in which demand is robust, deep, and growing faster than supply.

"Supply grew 32.2% over the past year, yet revenue and nightly rates both trended upward — a signal that traveller demand is outpacing new inventory rather than being diluted by it. For hosts, pricing power remains intact even as competition increases."

Independent short-term rental market analysis, Cotswold District, 2026

- 5.4.8 This local finding sits on top of the strong absolute performance of the Cotswold District market established in Section 4. That market sustains a median nightly rate of £219, a median occupancy of 64% (against a UK self-catering average of 41.6%), and an average annual revenue per listing of approximately £44,000 (double the national average), across 2,000 active listings (AirDNA; Hotel Solutions Stage 1 Appraisal, March 2026). The Cotswold District is therefore not only one of the strongest-performing self-catering markets in England in absolute terms; it is also a market that has demonstrably continued to grow its occupied demand as new supply has entered.

The Consistent Message Across All Three Levels

5.4.9 The evidence presents a single, consistent, and powerful message at every geographic scale relevant to this application:

Level	What the Data Shows	Source
National	UK occupied guest nights grew 10.2% to a record 93.8 million in the year to June 2025 (England +10.8%), while supply was also growing across all regions. New supply absorbed by growing demand.	ONS, Short-term lets statistics, published November 2025
Regional	Occupied guest nights grew across every English region (South East +5.8% to East Midlands +17.0%); no region declined. Rural and countryside destinations such as the Cotswolds performing most strongly.	ONS, November 2025; independent market analysis, 2025
Local	Cotswold District listing supply grew 32.2% in a single year, yet revenue and nightly rates continued to rise: "traveller demand is outpacing new inventory rather than being diluted by it."	AirROI Cotswold District analysis, 2026 dataset

5.4.10 The conclusion is clear and is supported by the most authoritative and current data available. Demand for self-catering holiday accommodation is growing, and that growth has consistently absorbed the new supply entering the market, at national, regional, and local level alike. The introduction of new, high-quality accommodation at Lake 62 would not displace existing trade; it would meet a share of a demand that is real, sustained, and continuing to expand. Far from there being any evidence that the market is saturated, the evidence demonstrates the opposite: this is a growing market that continues to absorb new supply, and the Cotswold District is among the clearest examples of that growth in the country.

5.5 KEY FINDINGS, SECTION 5

- The domestic tourism sector has consolidated at a level well above pre-pandemic norms, with value continuing to rise: GB domestic overnight spend reached £32.9 billion in 2024, up 5% on 2023, with spend per night up 16% to £107. The market is consolidating in volume but growing in value, which favours a premium proposition. Forward-booking data is strong, with Sykes reporting January 2026 bookings up 9% year-on-year.
- Consumer demand has shifted decisively and durably towards nature-based, restorative, experience-led and higher-quality stays, with affluent consumers "trading up" and prioritising distinctive, meaningful escapes (Mintel, RSM, Savills, 2025). Every one of these structural trends favours the accommodation proposed at Lake 62.
- The Wiltshire and Swindon Visitor Accommodation Futures Study (Hotel Solutions for VisitWiltshire and the Swindon and Wiltshire LEP) identified a clear future requirement for additional contemporary self-catering and lodge accommodation in Wiltshire and singled out the Cotswold Water Park as a prime opportunity location. That strategic requirement remains unmet, as Hotel Solutions has independently confirmed in its 2026 Appraisal.
- National: UK occupied guest nights grew by 10.2% to a record 93.8 million in the year to June 2025 (England +10.8%), while supply was simultaneously growing across all regions. New supply has been absorbed by growing demand, not displaced existing bookings (ONS, November 2025).

- Regional: occupied guest nights grew across every English region in the year to June 2025, ranging from +5.8% (South East) to +17.0% (East Midlands), with no region in decline. Rural and countryside destinations such as the Cotswolds are performing most strongly.
- Local: the Cotswold District saw self-catering supply grow by 32.2% in a single year, yet revenue and nightly rates continued to rise, with independent analysis concluding that "traveller demand is outpacing new inventory rather than being diluted by it." This sits on top of a market sustaining 64% median occupancy (vs 41.6% nationally) and £44,000 average annual revenue per listing. The consistent message at national, regional, and local level is that growing demand continues to absorb new supply.

6 SITE-SPECIFIC DEMAND CASE: THE LAKE 62 OPPORTUNITY

6.1 PURPOSE OF THIS SECTION

- 6.1.1 Sections 4 and 5 of this Statement have established the broad context: the Cotswold Water Park is a proven, nationally significant tourism destination with an affluent and large visitor catchment, and the national and local market for high-quality, nature-led, lakeside holiday accommodation is strong, growing, and demonstrably undersupplied in this locality.
- 6.1.2 This section applies that evidence directly to Lake 62. It sets out why this specific site, not any site in the Cotswold Water Park, but this site with its particular physical characteristics and locational attributes, is exceptionally well-positioned to meet the identified demand. It then addresses the planning precedent established by nearby consents and, critically, it directly addresses the requirement identified in the 2022 refusal decision: the need for robust, independently evidenced demonstration of demand for tourist accommodation at this location.

6.2 THE PHYSICAL DISTINCTIVENESS OF THE SITE

The Private Lake: A Materially Unique Asset

- 6.2.1 The single most important characteristic that distinguishes Lake 62 from every other potential development site in the western Cotswold Water Park is the private ownership of a 7-hectare freshwater lake as an integral part of the holding. This is not a site adjacent to a shared lake, or with access rights to a lake managed by others. It is a site where the landowner has complete ownership and control of a substantial body of open water, a body equivalent in scale to ten Premier League football pitches of open water, within the boundary of the development site.
- 6.2.2 The Stage 1 appraisal conducted for the owner (March 2026) is explicit on the significance of this asset. The appraisal states: "In the Cotswold Water Park market, direct lake access is the primary pricing driver." AirDNA data confirms that top-quartile properties in Cotswold District achieve £370 per night or more, and "premium properties consistently share one characteristic: they are on the water." The quantified premium for a lakeside lodge over an equivalent non-lakeside unit is £80 to £150 per night and 8 to 12 occupancy percentage points. On a single unit, across a year, this translates to a revenue differential of £15,000 to £35,000.
- 6.2.3 Private lake ownership adds a further material premium over shared lake access. Hotel Solutions notes that none of the established Cotswold Water Park operators "own their lake outright in the way this site does." Lower Mill Estate holds riparian rights; Watermark properties have shared pontoon and lake access. The ability to offer guests exclusive use of the entire lake, no sharing with other properties, no operator-managed watersports centres competing for the same water, creates what the appraisal describes as a "private estate quality signal that the market will pay a significant premium for." This exclusive-lake proposition simply does not exist anywhere else in the Cotswold Water Park.
- 6.2.4 The practical development advantages of the private lake are substantial and are summarised in the following table, drawn from the Stage 1 appraisal.

Lake Asset	Market Significance	Demand Evidence
Exclusive non-motorised watersports	Kayaking, paddleboarding, rowing, wild swimming, fishing, all exclusively for guests. No sharing with other operators or day visitors.	Water presence is "an important aspect for people taking a break in the Cotswolds Water Park" (Orion Holidays, 2022). Exclusive lake differentiates strongly from all existing CWP competitors.
Private fishing rights	Coarse and carp fishing from bank or jetty. Year-round demand segment with high midweek occupancy; anglers are price-insensitive and loyal.	Fishing holidays are a resilient, year-round niche within the short-break market, directly extending occupancy into shoulder and off-peak periods.
Visual asset for accommodation units	Every unit can be oriented to lake views if siting is correctly managed. Transforms standard countryside accommodation into waterfront accommodation.	Lakeside units consistently command the highest ADR in the CWP market. The visual premium translates directly to booking value.
Biodiversity and nature asset	SSSI-quality open water with potential for reed beds, marginal planting, water vole habitat, breeding and wintering birds.	Nature-based and wildlife-rich destinations are the fastest-growing segment in domestic tourism demand. The SSSI designation enforces the quality standard that protects this competitive advantage in perpetuity.
Development flexibility	Private ownership permits future consideration of overwater or waterside structures at Reserved Matters stage, a product format absent from the entire CWP market.	Savills (2025) confirms "unusual places to stay" saw a 242% increase in website traffic in 2024. Waterside product is among the highest-demand and highest-ADR formats nationally.

Scale of Landholding

6.2.5 At approximately 12 hectares in total (5ha land, 7ha lake), the Lake 62 holding is one of the largest single-ownership development sites in the western Cotswold Water Park with combined land and water assets under common ownership. This scale is important for two reasons. First, it provides sufficient land area to deliver up to 38 holiday units at a low density (approximately 7.6 units per hectare of the land parcel, or 3.2 units per hectare across the total holding), which is entirely consistent with the landscape-sensitive, nature-led character that the SSSI and National Landscape context demands and that the market rewards. Second, the scale of the holding allows for meaningful landscape treatment, screening, native planting, wildflower meadows, ecological habitat creation, in a way that smaller sites cannot accommodate.

Location Within the Destination

6.2.6 The site's position in the western, less commercially developed section of the Cotswold Water Park is itself a competitive advantage. Proximity to Ashton Keynes, a genuine, unspoiled conservation village with the White Hart Inn, the Thames Path National Trail, and an authentic rural character, adds a dimension of place and authenticity that the more heavily developed eastern CWP cannot replicate. The Hoseasons requirement that a new lodge development should "stand out in the marketplace" and offer something "differentiated" is directly addressed by this combination of private lake, conservation village adjacency, Thames Path access, and SSSI/National Landscape setting.

- 6.2.7 The SSSI and Cotswolds National Landscape designations, viewed through a commercial lens, are not only planning constraints, they are permanent guarantees of landscape quality. The Stage 1 appraisal makes this observation explicitly: "The SSSI constraint, properly managed, becomes a competitive advantage: it enforces the quality standard that commands premium pricing and protects the site from volume competition in perpetuity." No planning authority will consent a volume holiday park within the SSSI. The constraint that prevents a competitor from building 400 static caravans next door is the same constraint that gives this development its premium positioning.

6.3 THE GROWING TREND FOR NATURE-BASED AND WATER-CENTRED HOLIDAY ACCOMMODATION

- 6.3.1 Section 5 of this Statement documented the broad national trend towards nature-based, experiential, and wellness-oriented domestic holiday accommodation. This section applies that trend directly to what Lake 62 can offer, demonstrating that the site is not merely well-positioned for the current market, it is ideally positioned for the market as it is actively evolving.

The Nature Immersion Trend

- 6.3.2 The Canopy and Stars Glamping Market Report (2026) identifies nature immersion as a core and durable booking driver, describing a "perfect alignment with the booming wellness industry" as making it "the first choice for people in need of time in nature and the mental health benefits it brings." The same report notes that "its evolution into a more general concept of outdoor accommodation" has moved the sector far beyond its glamorous camping origins into a mature market segment commanding premium prices year-round.
- 6.3.3 The Savills May 2026 Spotlight on Tourism, Leisure and Events specifically identifies "growing demand for nature-based experiences, such as wildlife watching, outdoor adventure and conservation-led activities" as representing "a significant opportunity for rural landowners," and confirms that "continued interest in authentic experiences, wellness and sustainability is creating areas for growth, particularly for rural operators, where natural landscapes, heritage and slower-paced environments provide an advantage."
- 6.3.4 Lake 62 is not a site that can position itself as "nature-adjacent." It is a site where guests will be immersed in an SSSI wetland landscape, on a private freshwater lake supporting nationally significant biodiversity, within the Cotswolds National Landscape, and within walking distance of the Thames Path National Trail. This is an authentic nature experience that very few holiday accommodation sites in England can genuinely offer. The growing consumer preference for this type of experience translates directly into demand for accommodation at precisely this location.

"Sustainability and nature-led experiences are increasingly key booking drivers, particularly among higher-value guest segments... Eco-conscious, design-led accommodation consistently achieves higher ADR and occupancy... Activities such as wild swimming, wildlife observation, and low-impact watersports align with the sustainability narrative."

Hotel Solutions and Forward Land Stage 1 Site Appraisal, March 2026

The Water Premium

- 6.3.5 The demand for water-based holiday experiences specifically, as distinct from general countryside tourism, is among the most clearly evidenced and growing segments of the domestic short-break market. PSL's market consultation with Orion Holidays confirmed that "from a design perspective the onsite presence of water is an

important aspect for people taking a break in the Cotswolds Water Park." The AirDNA data assembled by Hotel Solutions demonstrates that this preference translates directly into pricing power, with the lakeside premium quantified at £80 to £150 per night over non-lakeside equivalents.

- 6.3.6 The trend is accelerating. The shift towards water-centred, nature-immersive holiday products is directly evidenced by the 242% increase in searches for "unusual places to stay" (Savills, 2025, citing Canopy and Stars data), and the specific growth in bookings for waterside and cabin accommodation. The UK ecotourism and nature-based tourism market is projected to grow from USD 11.7 billion in 2024 to USD 26.1 billion by 2035, a compound annual growth rate of 7.6%, one of the highest growth rates in any sub-sector of the UK tourism economy.
- 6.3.7 Lake 62's private 7-hectare lake positions it at the intersection of two converging demand trends: nature-based tourism and exclusive private water experiences. Neither of these trends shows any sign of abating; both are structurally supported by demographic shifts (millennial and Gen Z holidaymakers prioritising experience over luxury goods), by the working-from-home revolution (extending the short-break market into mid-week and longer durations), and by the sustained structural deterrent to overseas travel presented by cost, disruption, and environmental awareness.

The Wellness and Escape Market

- 6.3.8 The concept of "escape", from urban environments, digital overload, and workplace stress, is consistently identified in consumer research as a primary motivation for domestic short breaks. PSL's 2022 report notes earlier Barclays research identifying "escapism/distraction" as important to 82% of leisure time consumers. VisitEngland's own "Escape the Everyday" marketing campaign, launched in late 2020, was designed to capitalise on exactly this motivational driver.
- 6.3.9 The Lake 62 site can authentically deliver this experience. A private lake, an SSSI wetland, a conservation village a short walk away, and the Cotswolds National Landscape as the backdrop, these are not manufactured attributes applied to an unremarkable site. They are the genuine, inherent character of this location. The growing wellness tourism market, which Savills identifies as a primary growth driver for quality rural accommodation, is the market that this site is uniquely well-suited to serve.

6.4 COMPARABLE MARKET PERFORMANCE: CURRENT EVIDENCE OF DEMAND IN THE LOCALITY

- 6.4.1 The most direct form of site-specific demand evidence is the current commercial performance of comparable, proximate accommodation. The Cotswold Water Park already contains a number of high-quality, nature-led, lakeside operators whose continued strong trading and forward-booking position provide direct, present-day confirmation of sustained demand for the type of accommodation proposed at Lake 62. The evidence below is drawn from the Stage 1 Appraisal (Hotel Solutions, March 2026) and from current operator information, and is consistent with the market-wide growth in occupied demand established in Section 5.

Comparator	Proximity	Current Performance	Relevance to Lake 62
Little Horseshoe Lake (5 architect-designed	c.3.4 miles	Achieving £380-£500 per night at peak (Hotel Solutions, March 2026). Adults-only, sustainable, design-led fishing and nature	The closest direct analogue to the proposed product: private-lake, architect-designed, nature-led.

lodges, private lake eco-reserve)		retreat operating across five lodges.	Confirms a premium private-lake offer is commercially viable in this market today.
Log House Holidays (8 luxury log cabins, private 130-acre lake nature reserve)	c.5 minutes' drive	Established premium operator actively taking 2026 bookings, with peak and festive periods for the year ahead reported as already booked. Eight secluded lakeside cabins from a premium tariff.	Directly comparable private-lake nature product in immediate proximity. Strong forward bookings confirm sustained, advance-committed demand.
Lower Mill Estate (luxury lakeside lodges, 550-acre estate; Habitat Escapes / Orion)	c.10 minutes' drive	Premium lakeside lodges achieving £650-£900+ per night at peak (Hotel Solutions, March 2026); most sought-after lakeside homes "rarely available" and taking 2026 summer bookings well in advance.	The regional benchmark for premium lakeside product. Demonstrates the ceiling of achievable value and the depth of demand at the top of the market.
Watermark Lakes (New England-style lakeside lodges; Orion-managed)	Within CWP	Lakeside lodges with private jetty and hot tub achieving £320-£550 per night at peak (Hotel Solutions, March 2026), with strong occupancy reported across the managed portfolio.	Confirms consistent premium pricing for shared-lake lodge product; Lake 62's private lake offers a further differentiator above this benchmark.
Orion Holidays managed portfolio (largest single CWP letting portfolio)	Across CWP	Largest manager of self-catering lodges and cottages in the Cotswold Water Park, reporting consistently strong occupancy across its portfolio and actively expanding its CWP offer.	The principal operator in the destination continues to grow, confirming a deep and sustained demand base.

Sources: Hotel Solutions Stage 1 Site Appraisal, March 2026 (live pricing); operator booking information, 2026. Peak nightly rates are indicative and vary by unit size, season and specification.

- 6.4.2 The evidence is consistent and current. Across every comparable, proximate operator, the picture in 2026 is the same: **high-quality, nature-led, lakeside accommodation in the Cotswold Water Park continues to command strong nightly rates, to trade at healthy occupancy, and to attract committed bookings well in advance for the year ahead.** This is direct, present-day market evidence from the immediate locality, and it confirms that the demand identified at the national, regional, and local levels in Section 5 translates into real, sustained trading performance for precisely the type of product proposed at Lake 62.
- 6.4.3 Critically, this local performance must be read alongside the supply-absorption evidence in Section 5. The Cotswold District market has absorbed substantial new supply over the past year while sustaining, and growing, pricing and revenue. The continued strong trading of the established lakeside operators, even as the wider market has expanded, is the clearest possible demonstration that new high-quality accommodation in this destination is met by genuine, growing demand rather than displacing the trade of existing providers. There is no evidence of saturation in the quality lakeside segment; the evidence points firmly the other way.

"Market evidence confirms strong demand for high-quality, nature-led accommodation, with clear premiums attached to lakeside positioning and distinctive product types. The absence of exclusive private-lake experiences within the Cotswold Water Park highlights a clear market gap."

Hotel Solutions and Forward Land Stage 1 Site Appraisal, March 2026

6.5 COMMERCIAL DEMAND VALIDATION: OPERATOR REVENUE BENCHMARKS FOR THIS LOCALITY

- 6.5.1 Beyond the performance of comparable operators, there is direct commercial validation of the revenue-generating capacity of holiday accommodation in this specific locality. As part of the evidence base assembled for the nearby scheme on land off Spine Road East, the national holiday lettings agency Hoseasons produced revenue projections for a high-quality lodge scheme in this exact market area, derived from its own live regional trading data for Gloucestershire, Wiltshire, and Somerset.
- 6.5.2 Those projections, prepared on a deliberately reserved basis, indicated that a high-quality lodge scheme in this locality could achieve net accommodation revenue of approximately **£42,000 to £45,000 per unit per year**, equating to total annual accommodation income for a 70-unit scheme in the order of £3.0 million in the first year of operation, rising thereafter as the scheme matured. These figures were derived from a specialist national agency's actual trading analysis for this region, not from theoretical modelling.
- 6.5.3 That commercial validation relates to a different scheme, of a different scale and operating model, on a different site. It is referenced here for one purpose only, and a powerful one: it demonstrates that a specialist national operator, examining its own live trading data for this precise geographic market, independently concluded that a high-quality lodge scheme here is commercially robust at a substantial revenue level. The underlying market demand that supports those revenue levels is the same demand that would support accommodation at Lake 62.
- 6.5.4 These operator benchmarks are consistent with the independent, current market data. The AirDNA evidence in the Stage 1 Appraisal shows the Cotswold District self-catering market sustaining an average annual revenue per listing of approximately £44,000, across 2,000 listings, at a median occupancy of 64% against a UK average of 41.6% (Hotel Solutions, March 2026). **The operator revenue benchmark and the independent market data corroborate one another precisely, and both are reinforced by the Section 5 finding that occupied demand in this market has continued to grow as new supply has entered.** For a scheme of 38 units at Lake 62, with the additional competitive advantage of a genuinely private lake, the commercial demand to support the development is therefore evidenced from two independent directions at once.
- 6.5.5 Taken together with the comparable performance evidence in 6.4 and the market-wide growth evidence in Section 5, the conclusion is firm: demand for high-quality self-catering holiday accommodation in this locality is not only proven but quantified, and it is sufficient to support a development of the scale proposed without displacing the trade of existing providers.

6.6 PLANNING PRECEDENT: NEARBY CONSENTS AND THEIR SIGNIFICANCE

The Appeal-Allowed 70-Unit Scheme (PL/2022/04776)

- 6.6.1 A planning application for up to 70 holiday units on land off Spine Road East, within the same Cotswold Water Park setting and within the same Wiltshire planning authority area as Lake 62, was submitted under reference PL/2022/04776. That application proposed an eco-lodge holiday accommodation scheme on a rental basis. It was appealed to the Planning Inspectorate on grounds of non-determination by Wiltshire Council, and Wiltshire Council accepted the case on appeal.
- 6.6.2 The significance of this outcome for the present application is fundamental. When an applicant appeals on grounds of non-determination and the Council accepts the case, it means the Council does not contest the principle of the development and does not seek to defend a refusal before the Inspector. The Council's acceptance of the case for 70 holiday units on land off Spine Road East within the Cotswold Water Park constitutes, in planning terms, an acceptance of the principle that holiday accommodation development at this scale, in this locality, and within this specific destination, is acceptable in planning policy terms.
- 6.6.3 The Council's acceptance of the principle in that case carries direct and material weight for this application. While the product type, operational model, and specific site differ from the present proposals, the core planning question, namely whether the principle of holiday accommodation development in this part of the Cotswold Water Park is acceptable, was answered affirmatively by the Council's acceptance of that appeal. This Statement does not suggest that acceptance of that case creates an absolute presumption in favour of all holiday accommodation development in the area; but it is a powerful material consideration confirming that the Council has, in the very recent past and in direct proximity, accepted the principle of such development.
- 6.6.4 The principle accepted by the Council in that case is now supported, for the present application, by a materially stronger and more current evidence base. **Whereas the demand case for the earlier scheme rested largely on evidence assembled in 2022, this Statement is founded on the most recent and authoritative data available, including the Office for National Statistics short-term lets statistics (published November 2025), current Cotswold District market performance data, and the independent Stage 1 Site Appraisal by Hotel Solutions and Forward Land (March 2026).** The present application therefore advances the principle the Council has already accepted and does so on a more robust and up-to-date evidential footing than the application the Council accepted.

The Hoburne Cotswold Consent (92 Holiday Lodge Caravans)

- 6.6.5 Hoburne Cotswold, located approximately 0.75 miles to the east of Lake 62 on Spine Road East, is an established holiday park that received planning permission from Wiltshire Council for 92 additional holiday lodge caravans on land adjacent to its existing site. This permission, granted at a scale materially greater than the 38 units proposed at Lake 62, confirms that Wiltshire Council has accepted the principle of holiday accommodation development at significant scale on the same road corridor and within the same Cotswold Water Park destination.
- 6.6.6 The Hoburne consent is for a different type of product from that proposed at Lake 62, namely conventional holiday park lodge caravans rather than high-quality bespoke holiday units on a private lake, but the planning principle it establishes is directly relevant: holiday accommodation development at this scale, in this location, is an acceptable use of land. The present application, proposing fewer units (38 against 92) on a site with stronger inherent characteristics and a more distinctive product proposition, sits comfortably within the envelope of what the Council has already accepted in this locality.

6.7 DIRECTLY ADDRESSING THE 2022 REFUSAL: THE DEMAND REQUIREMENT COMPREHENSIVELY MET

- 6.7.1 Section 2 of this Statement recorded that the refusal of application PL/2021/06229 in August 2022 identified two specific requirements that any future holiday accommodation proposal at Lake 62 would need to address: high design quality appropriate to the Cotswold Water Park, and robust independently evidenced demand. The design requirement is addressed through the outline application approach since all matters of design are expressly reserved for Reserved Matters determination. This section concludes by directly addressing the demand evidence requirement.
- 6.7.2 The Officer's Delegated Report for PL/2021/06229 stated that the application was "not supported by any evidence of demand for this type and standard of facility in this location." The report also drew an adverse inference from the conversion of nearby Oaksey Golf Course holiday units to residential use, on the grounds of insufficient local demand.
- 6.7.3 This Statement directly and comprehensively addresses that requirement. The demand evidence provided is extensive, independently sourced, current, and convergent, the substantial majority of it published in 2025 and 2026. The following table summarises the evidence and shows how each element responds to the demand requirement identified in 2022.

Evidence Category	Current Finding
National demand (occupied nights)	UK occupied guest nights in short-term lets grew by 10.2% to a record 93.8 million in the year to June 2025 (England +10.8%), achieved while supply was simultaneously growing across all regions. New supply is being absorbed by growing demand. (ONS, November 2025)
National demand (value)	GB domestic overnight tourism spend reached £32.9 billion in 2024, up 5% on 2023, with average spend per night up 16% to £107. The market is consolidating in volume but growing in value, favouring a premium proposition. (VisitBritain GBTS 2024)
Regional demand	Occupied guest nights grew across every English region in the year to June 2025 (from +5.8% in the South East to +17.0% in the East Midlands), with no region in decline. Rural and countryside destinations such as the Cotswolds are performing most strongly. (ONS, November 2025)
Local market (supply absorption)	Cotswold District self-catering supply grew by 32.2% over the past year, yet revenue and nightly rates continued to rise: independent analysis concludes "traveller demand is outpacing new inventory rather than being diluted by it." (AirROI, 2026 dataset)
Local market (performance)	Cotswold District sustains a median ADR of £219, a median occupancy of 64% (against a UK average of 41.6%), and average annual revenue per listing of approximately £44,000 (double the national average), across 2,000 listings. Lakeside position adds a premium of £80-£150/night. (AirDNA; Hotel Solutions, March 2026)
Current comparator performance	Proximate lakeside operators are trading strongly today: Little Horseshoe Lake £380-£500/night peak; Lower Mill Estate £650-£900+/night peak; Watermark £320-

	£550/night peak; with leading operators taking 2026 bookings well in advance. (Hotel Solutions, March 2026; operator information, 2026)
Commercial revenue validation	Specialist national operator revenue benchmarks for this locality indicate £42,000-£45,000 net accommodation revenue per unit per year, corroborated precisely by the independent AirDNA average of approximately £44,000 per listing.
Strategic accommodation need	The Wiltshire and Swindon Visitor Accommodation Futures Study (Hotel Solutions for VisitWiltshire and the Swindon and Wiltshire LEP) identified a clear future requirement for contemporary self-catering and lodge accommodation, singling out the Cotswold Water Park as a prime location. Hotel Solutions confirms in its 2026 Appraisal that the requirement remains unmet.
Independent site appraisal	Hotel Solutions and Forward Land Stage 1 Appraisal (March 2026): "The site represents a rare and highly differentiated opportunity... Market evidence confirms strong demand for high-quality, nature-led accommodation, with clear premiums attached to lakeside positioning."
Planning precedent	Wiltshire Council accepted the case on appeal for 70 holiday units on Spine Road East (PL/2022/04776) and granted consent for 92 holiday lodge caravans at Hoburne Cotswold, confirming the principle of holiday accommodation at scale in this immediate locality.

Sources as cited. Primary market evidence is drawn from ONS (November 2025), AirDNA/AirROI (2025-26), VisitBritain (2024-25) and the Hotel Solutions and Forward Land Stage 1 Site Appraisal (March 2026).

- 6.7.4 The Officer's reference in 2022 to the Oaksey Golf Course conversion as evidence of a lack of demand in the area carries no weight against the present application. The Oaksey conversion concerned purpose-built holiday units on a golf course, a fundamentally different product in a fundamentally different setting from a private-lake, nature-led destination in the heart of the Cotswold Water Park. **More importantly, that historic local observation is now comprehensively outweighed by the current, independent, market-wide evidence set out above, which demonstrates that demand for quality self-catering accommodation in this district is growing and is actively absorbing new supply.** No weight should be attached to the Oaksey experience as a comparator for a scheme of this type at this location.
- 6.7.5 The evidence assembled in this Statement is not a narrow response to the 2022 refusal; it is a comprehensive, independent, and current evidence base that addresses the demand requirement from every relevant direction. **It runs consistently from the national level (ONS occupied guest nights up 10.2% to a record 93.8 million while supply grew), through the regional level (growth across every English region), to the local level (Cotswold District supply up 32.2% in a year while revenue and rates continued to rise), and is confirmed by the present-day trading performance of comparable lakeside operators and by independent operator revenue benchmarks for this precise locality.** Every strand points to the same conclusion: demand for high-quality self-catering holiday accommodation in the Cotswold Water Park is proven, sustained, and growing, and new supply is being absorbed by that growing demand rather than displacing existing trade. At this specific site, with its private lake, SSSI setting, and National Landscape position, the case is stronger still. The demand requirement identified in the 2022 refusal has been comprehensively and demonstrably met.

6.8 KEY FINDINGS, SECTION 6

- The private ownership of a 7-hectare freshwater lake is the defining competitive advantage of Lake 62 and a materially unique asset within the Cotswold Water Park. No other CWP operator owns their lake outright in this way. This creates an exclusive private-lake experience, for watersports, fishing, nature immersion, and waterside enjoyment, which is entirely absent from the existing accommodation market in this destination.
- Lake access is quantified as the primary pricing driver in this market, commanding a premium of £80 to £150 per night and 8 to 12 occupancy percentage points over non-lakeside equivalents. On a single unit across a year, this represents a revenue differential of £15,000 to £35,000. The Lake 62 private lake places every unit on the site within the lakeside pricing tier.
- The site is optimally positioned for the two most powerful structural demand drivers in the domestic self-catering market: the growing preference for nature-based, restorative experiences, and the premium attached to water-centred breaks. The SSSI and National Landscape designations, properly leveraged, are competitive assets that protect the quality standard and exclusivity of this site in perpetuity.
- Current performance of comparable, proximate operators confirms sustained, present-day demand for this product type in this locality: Little Horseshoe Lake achieving £380 to £500 per night at peak, Lower Mill Estate approximately £650 to £900+ per night at peak, and Watermark lakeside lodges approximately £320 to £550 per night, with the leading lakeside operators taking 2026 bookings well in advance. Read alongside the Section 5 finding that the Cotswold District market has absorbed substantial new supply while growing revenue, this confirms that new high-quality accommodation is met by growing demand rather than displacing existing trade.
- Commercial demand is independently quantified from two directions: specialist national operator revenue benchmarks for this locality (£42,000 to £45,000 net accommodation revenue per unit per year) and independent current market data (average annual revenue per Cotswold District listing of approximately £44,000 at 64% median occupancy, against a UK average of 41.6%). The two corroborate one another precisely.
- The nearby planning precedents, namely Wiltshire Council's acceptance of the appeal for up to 70 holiday units on land off Spine Road East (PL/2022/04776) and the granted consent for 92 holiday lodge caravans at Hoburne Cotswold, confirm that the principle of holiday accommodation development at scale within the Cotswold Water Park in this locality is established. The present application, for 38 units on a site with materially stronger inherent characteristics, is consistent with that established principle and is advanced on a more current and authoritative evidence base than the application the Council accepted.
- The specific requirement identified in the 2022 refusal, namely robust, independently evidenced demonstration of demand for tourist accommodation at this location, is comprehensively met. The evidence runs consistently from national level (ONS occupied guest nights up 10.2% to a record 93.8 million in the year to June 2025, while supply grew), through regional level (growth across every English region), to local level (Cotswold District supply up 32.2% in a year while revenue and rates continued to rise), and is confirmed by the current trading performance of comparable lakeside operators. Demand at this location is proven, sustained, and growing, and new supply is being absorbed by that growing demand.

7 ECONOMIC AND TOURISM BENEFITS

7.1 INTRODUCTION

- 7.1.1 This section sets out the economic and tourism benefits that the proposed development at Lake 62 will generate for the local and rural economy. The benefits are assessed at two distinct levels: the direct economic impact of visitor spending in the local area; and the broader strategic contribution to the Wiltshire tourism economy and the rural economic objectives of the development plan.
- 7.1.2 This Statement intentionally remains silent on the detailed operational model for the holiday units, which has not yet been finalised and is not a matter for determination at this outline stage. The economic benefits assessed in this section are those that arise directly from the generation of visitor stays at the site, visitor spending in the local economy, employment creation, and contribution to the rural visitor economy. These benefits are inherent in any holiday use of the site, regardless of the specific operational arrangements adopted, and they represent a material consideration weighing in favour of the grant of planning permission.

7.2 VISITOR SPENDING: DIRECT ECONOMIC IMPACT

Methodology

- 7.2.1 The methodology applied in this section is the standard industry approach. This approach draws on the Frontline Consultants economic impact methodology, which was independently commissioned by the UK Caravan and Camping Alliance and applies the multiplier derived from the UK Input-Output Analytical Tables (HM Treasury, 2018). This is the appropriate and widely accepted methodology for estimating the economic impact of holiday accommodation schemes of this type.
- 7.2.2 The key inputs are: unit numbers; occupancy rates; average party size; average visitor spend per night in the Cotswold District; and the industry-standard Frontline multiplier of 1.47. Updated spend data is drawn from the VisitBritain Great Britain Tourism Survey 2024 (average spend per night in England: £107), cross-referenced against the Cotswold Tourism Economic Impact Studies (2019 to 2023, The South West Research Company), which report an average self-catering spend per night in Cotswold District of £101.90.

Indicative Economic Impact Calculation

- 7.2.3 The following table sets out the indicative economic impact calculation for 38 holiday units at Lake 62, using the standard Frontline/Avison Young methodology. The inputs have been selected conservatively: occupancy is based on the AirDNA median for Cotswold District (64.5%) rather than the higher occupancy achieved by comparable lakeside operators; the average spend per night is the Cotswold District self-catering benchmark of £101.90 rather than the higher England-wide average of £107; and the party size used (4.5 persons) reflects the typical mix of unit types expected.

Variable	Value Applied	Source
Number of holiday units	38	Outline proposal
Annual occupancy rate (conservative CWP median)	64.5%	AirDNA / Hotel Solutions, 2026

Average party size per unit per night	4.5 persons	Industry benchmark
Unit-nights per annum (38 x 365 x 64.5%)	8,934	Calculated
Visitor nights per annum (8,934 x 4.5)	40,201	Calculated
Average spend per visitor per night (Cotswold District self-catering)	£101.90	Cotswold Tourism Economic Impact Studies 2019-2023
Total direct visitor spend per annum	£4,096,338	Calculated
Frontline/UK Input-Output indirect and induced multiplier	1.47	Frontline Consultants for UKCCA, 2019
Total economic impact per annum (direct + indirect + induced)	c. £6,022,000	Calculated

Note: This is an indicative estimate based on standard industry methodology, applied conservatively. The actual economic impact will depend on the operational arrangements adopted, unit mix, and achieved occupancy. Figures are presented to the nearest £1,000.

- 7.2.4 On a conservative basis, applying the median occupancy for Cotswold District self-catering accommodation to 38 holiday units at Lake 62, the indicative total economic impact in the local area is approximately £6 million per year. This figure encompasses both the direct visitor spending in the local economy, in pubs, restaurants, shops, activity centres, and service businesses in and around Ashton Keynes, Cricklade, Cirencester, and the wider Cotswold Water Park area, and the indirect and induced economic effects that flow through the local supply chain and workforce.
- 7.2.5 The breakdown of visitor spending in Cotswold District and Gloucestershire, drawn from the Cotswold Tourism Economic Impact Studies, confirms how this spending flows into the local economy: accommodation 36.4%; food and drink 21.2%; transport 18.5%; shopping 13.5%; and visitor attractions 10.4%. The non-accommodation components, food and drink, shopping, and attractions, which together represent 45.1% of visitor spend, flow directly into local rural businesses in Ashton Keynes, Cricklade, Cirencester, and the Cotswold Water Park visitor economy. For 40,201 visitor nights per year, non-accommodation local spend amounts to approximately £1.85 million per year flowing into local businesses.

£6.0m

indicative total annual economic impact (direct, indirect and induced), applying Cotswold District benchmark data.

£1.85m

indicative annual spend in local food, drink, shopping and attractions businesses from visitors to the site.

40,201

indicative visitor nights generated annually at the development (conservative occupancy assumption)

7.3 EMPLOYMENT GENERATION

- 7.3.1 The Deloitte Tourism Jobs and Growth Report (2013), cited in both the Frontline/UKCCA economic impact assessment and the Avison Young Tourism Need Assessment, established that in the UK tourism economy, approximately £54,000 of total visitor expenditure is required to sustain one full-time equivalent (FTE) job. Adjusted for inflation to 2024 prices (using the VisitBritain updated figure of approximately £78,000 per FTE at

current prices), the total economic impact of the Lake 62 development would sustain an estimated 77 FTE jobs in the local economy.

- 7.3.2 This figure encompasses both the direct employment generated by the development (on-site management, housekeeping, maintenance, landscape and ecological management, ancillary commercial uses) and the indirect and induced employment supported through visitor spending in local businesses. The on-site direct employment component alone is estimated to encompass:

Employment Category	Estimated FTE Range	Notes
Site management and administration	2 to 4 FTE	Year-round; general manager, site administrator.
Housekeeping and changeover	4 to 8 FTE	Seasonal peaks; includes local contractors.
Grounds, landscaping and ecological management	2 to 3 FTE	Year-round; includes lake management.
Maintenance and infrastructure	1 to 2 FTE	Year-round.
Ancillary commercial uses (bike hire, cafe and similar, subject to demand)	3 to 6 FTE	Subject to final decision on ancillary uses at Reserved Matters stage.
Total direct on-site employment (indicative)	12 to 23 FTE	Year-round and seasonal combined.

Note: These are indicative estimates based on comparator operations and industry benchmarks. Actual employment will depend on the operational model adopted at Reserved Matters stage.

- 7.3.3 The development is expected to generate employment primarily for local residents in Ashton Keynes, Cricklade, and the surrounding rural area. The type of employment generated, housekeeping, grounds maintenance, food and beverage service, activity management, is appropriate to the skills base of the rural economy and provides both full-time and flexible part-time employment. This is precisely the type of economic benefit that Core Policy 48 of the Wiltshire Core Strategy seeks to encourage: sustainable rural economic development that makes a positive contribution to the rural economy while being sensitive to the environment.

7.4 TOURISM ECONOMY: CONTRIBUTION TO WILTSHIRE'S STRATEGIC OBJECTIVES

- 7.4.1 The wider tourism economy benefits of the proposed development are directly aligned with the strategic objectives of VisitWiltshire as the accredited Local Visitor Economy Partnership for the county, and with the objectives of the Wiltshire Core Strategy and the Cotswold Water Park management strategy.
- 7.4.2 VisitWiltshire's analysis confirms that tourism in Wiltshire already supports approximately 28,000 jobs (20,927 FTEs), representing 8% of all employment in the county. The proposed development would add directly to this figure, both in terms of on-site employment and through the wider local economic impact of visitor spending. The VisitWiltshire Destination Management and Development Plan 2015 to 2020 specifically identified "more accommodation and a wider range to support the growth of short breaks" as a priority for investment, noting that the county is "full" at certain times of the year and that accommodation capacity constraints are limiting the sector's performance. The Lake 62 development directly addresses this identified priority.

7.4.3 The Hotel Solutions Wiltshire Visitor Accommodation Futures Study (2014) noted the strategic priority of expanding contemporary holiday lodge and glamping accommodation in Wiltshire, confirming that "the county needs more of these types of accommodation if it is to compete successfully in the future and attract new markets that are currently going elsewhere." The proposed development at Lake 62 delivers exactly the type of product that this strategic assessment identified as needed over a decade ago, and which the market evidence assembled in this Statement confirms remains acutely undersupplied today.

7.5 ENVIRONMENTAL AND BIODIVERSITY BENEFITS

7.5.1 The economic and tourism benefits of the proposed development are not confined to visitor spending and employment. A development of this type, properly designed and managed in accordance with the SSSI and National Landscape designations that apply to the site, will deliver measurable environmental and biodiversity benefits that represent a material economic value to the rural economy and the wider visitor economy.

7.5.2 A mandatory requirement of the planning system in England is the delivery of Biodiversity Net Gain (BNG). The Lake 62 site, with its private 7-hectare lake, potential for wetland habitat creation, reed bed planting, marginal aquatic vegetation, and wildflower meadow establishment on the land parcel, is well-suited to delivering meaningful and measurable BNG. The Stage 1 appraisal (Hotel Solutions and Forward Land, March 2026) confirms that "a comprehensive sustainability strategy should be embedded at the core of the development rather than applied retrospectively," and identifies specific BNG opportunities including wetland margins, reed beds, species-rich grassland, woodland and hedgerow planting, and provision for protected and priority species.

7.5.3 The environmental enhancement benefits also carry direct commercial value in the accommodation market. Savills (2025) confirms that sustainability credentials and nature-led experiences are "increasingly key booking drivers, particularly among higher-value guest segments." A genuine ecological enhancement programme, with independently verified BNG and a nature management plan for the lake, strengthens the planning case, supports the site's commercial positioning, and delivers lasting public benefit in a nationally designated landscape.

7.6 CONTRIBUTION TO THE RURAL ECONOMY: PLANNING BALANCE

7.6.1 In assessing the weight to be given to the economic benefits of the proposed development in the planning balance, the following points are material:

Policy Objective	How the Development Delivers
NPPF para 85: significant weight to economic growth and productivity	The development generates approximately £6m total annual economic impact and 77 FTE jobs across the local economy. This is significant economic growth in a rural area.
NPPF para 88(c): sustainable rural tourism	The development is a paradigm example of sustainable rural tourism, small-scale, nature-led, high-quality, in an established leisure destination, with minimal built footprint.
WCS Core Policy 39(ii): contribution to local economy	Visitor spending of approximately £1.85m per year in local food, drink, shopping, and activity businesses directly delivers this objective.
WCS Core Policy 48: supporting rural life	12 to 23 direct on-site jobs, the majority expected to be filled by local residents. Contribution to maintaining the vitality of the rural economy around Ashton Keynes.

WCS Core Policy 54(ii): contribution to CWP local economy	The development directly contributes to the Cotswold Water Park economy, supporting the visitor infrastructure and activity businesses that depend on overnight stays.
VisitWiltshire LVEP strategic objectives	Delivers new, high-quality accommodation capacity in the Cotswold Lakes sub-destination, directly addressing the identified accommodation gap and supporting the county's visitor economy growth objectives.

7.7 KEY FINDINGS, SECTION 7

- Applying standard industry methodology (Frontline/Avison Young), the proposed development of 38 holiday units at Lake 62, at conservative Cotswold District median occupancy, generates an indicative total annual economic impact of approximately £6 million in the local economy. This encompasses direct visitor spending of approximately £4.1 million per year and indirect/induced effects of a further £1.9 million through the local supply chain.
- Of the total visitor spend, approximately £1.85 million per year flows directly into local food and drink businesses, retailers, visitor attraction operators, and service providers in Ashton Keynes, Cricklade, the Cotswold Water Park, and the wider area. This represents a material and sustained contribution to the rural economy of the area.
- The development is estimated to sustain 77 FTE jobs across the local economy through direct, indirect, and induced effects. Direct on-site employment of 12 to 23 FTE is expected, in roles appropriate to the local rural skills base and spanning year-round and seasonal positions.
- The economic benefits directly deliver the objectives of NPPF paragraphs 85 and 88(c), WCS Core Policies 39, 48, and 54, and the VisitWiltshire LVEP strategic priorities for the county's visitor economy. The development addresses the identified accommodation capacity gap confirmed by Hotel Solutions in 2014 and still unresolved today.
- Mandatory Biodiversity Net Gain delivery through lake habitat enhancement, wetland margin creation, and species-rich grassland establishment provides both a measurable environmental benefit and a strengthened commercial positioning for the development in the nature-led, sustainability-conscious premium accommodation market.

8 SUMMARY AND CONCLUSIONS

8.1 OVERVIEW

- 8.1.1 This Visitor Accommodation Supporting Statement has been prepared by Bluestone Planning in support of an outline planning application for up to 38 holiday units and ancillary commercial uses at Lake 62, Cotswold Water Park, Ashton Keynes, Wiltshire, with all matters reserved except for the principle of the change of use and access.
- 8.1.2 The Statement has assembled, structured, and presented a comprehensive and independently evidenced case for the grant of outline planning permission. The purpose of the present section is to draw together the principal conclusions from each part of the Statement and to state clearly why, having regard to the totality of the evidence, planning permission should be granted.

8.2 THE PLANNING POLICY FRAMEWORK SUPPORTS THIS APPLICATION

- 8.2.1 The planning policy framework at every level, national, development plan, and strategic tourism strategy, supports the principle of high-quality holiday accommodation at this location.
- 8.2.2 At the national level, paragraph 88(c) of the NPPF (December 2024) expressly supports "sustainable rural tourism and leisure developments which respect the character of the countryside." The proposed development is precisely that. The presumption in favour of sustainable development at paragraph 11 operates in favour of approving this application. The rural economy policies at paragraphs 85 and 89 reinforce the acceptability of the open countryside location within the established Cotswold Water Park leisure destination. The design and National Landscape requirements that are relevant to this site (paragraphs 135 and 189) are properly addressed through the reserved matters approach.
- 8.2.3 The statutory development plan, the Wiltshire Core Strategy (2015), provides direct, positive support. Core Policy 39 supports tourist development in or close to the Cotswold Water Park area. Core Policy 54 provides a site-specific enabling framework for appropriate development within the Cotswold Water Park. Core Policies 40 and 48 confirm the desirability of quality visitor accommodation and rural economic development. Core Policies 51 and 57 impose design quality requirements that are properly the subject of Reserved Matters applications and cannot be applied adversely at outline stage where all design matters are reserved.
- 8.2.4 The Ashton Keynes Neighbourhood Plan (2017) adds further positive policy support. Policy ECP2 directly enables development within the Cotswold Water Park where it strengthens the CWP's landscape character and sense of place, exactly what this application, at Reserved Matters stage, will deliver.
- 8.2.5 National and regional tourism strategies, the LVEP programme, the Cotswolds Tourism Destination Management Plan 2022 to 2025, the emerging Cotswolds Plus LVEP Destination Tourism Growth and Management Plan (tendered February 2026), and the VisitWiltshire destination management framework, all confirm that investment in high-quality visitor accommodation in the Cotswold Lakes is a strategic priority supported at the highest level of the tourism management hierarchy.

8.3 DEMAND FOR HOLIDAY ACCOMMODATION AT THIS LOCATION IS PROVEN

- 8.3.1 The core evidential requirement identified by the 2022 refusal, the need for robust, independently evidenced demonstration of demand for tourist accommodation at this location, is comprehensively satisfied by this Statement.
- 8.3.2 The evidence of demand is not anecdotal or selective. It is drawn from authoritative, independent, and current sources, the substantial majority published in 2025 and 2026, and it runs consistently from the national level, through the regional level, to the local Cotswold District and the site's immediate competitors. Every strand points in the same direction, and the central finding is a simple and powerful one: demand for self-catering holiday accommodation is growing, and new supply is being absorbed by that growing demand rather than displacing existing trade.
- 8.3.3 The key demand findings are:

	Demand Finding
1	National: UK occupied guest nights grew 10.2% to a record 93.8 million in the year to June 2025 (England +10.8%), achieved while supply was simultaneously growing across all regions. New supply is being absorbed by growing demand. (ONS, November 2025)
2	Regional: occupied guest nights grew across every English region in the year to June 2025 (from +5.8% in the South East to +17.0% in the East Midlands), with no region in decline. Rural and countryside destinations are performing most strongly. (ONS, November 2025)
3	Local: Cotswold District self-catering supply grew 32.2% in a single year, yet revenue and nightly rates continued to rise: "traveller demand is outpacing new inventory rather than being diluted by it." (AirROI, 2026)
4	Local performance: Cotswold District sustains a median ADR of £219/night, median occupancy of 64% (vs UK average 41.6%), and average annual revenue per listing of approximately £44,000 (double the national average), across 2,000 listings. (AirDNA; Hotel Solutions 2026)
5	National value: GB domestic overnight tourism spend reached £32.9bn in 2024, up 5% on 2023, with average spend per night up 16% to £107. The market is consolidating in volume but growing in value, favouring a premium proposition. (VisitBritain GBTS 2024)
6	Current comparators: proximate lakeside operators are trading strongly today, with Little Horseshoe Lake at £380-£500/night peak, Lower Mill Estate at £650-£900+/night peak, and Watermark at £320-£550/night peak; leading operators are taking 2026 bookings well in advance. (Hotel Solutions 2026)
7	Commercial validation: specialist national operator revenue benchmarks for this locality (£42,000-£45,000 net accommodation revenue per unit per year) corroborate the independent AirDNA average of approximately £44,000 per listing.
8	Independent appraisal: "The site represents a rare and highly differentiated opportunity within the Cotswold Water Park... Market evidence confirms strong demand for high-quality, nature-led accommodation." (Hotel Solutions and Forward Land Stage 1 Appraisal, March 2026)

8.4 THIS SITE IS EXCEPTIONALLY WELL-POSITIONED TO MEET THAT DEMAND

- 8.4.1 The Lake 62 site is not merely a site within a strong market. It is a site with a materially unique competitive advantage, the private ownership of a 7-hectare freshwater lake, which positions it at the very top of the Cotswold Lakes accommodation market. The private lake creates an exclusive waterside experience that no existing CWP operator can replicate, commands the highest pricing tier in the market, and directly addresses

the three identified gaps in the current CWP accommodation supply: boutique-scale land-and-water product, exclusive private-lake watersports, and genuine nature-immersive positioning.

- 8.4.2 The SSSI designation and the Cotswolds National Landscape setting, which might be expected to deter development, are in fact material competitive assets when professionally managed. They guarantee the quality and exclusivity of the natural environment that drives demand for this type of accommodation. They protect the site from volume competition in perpetuity. And they provide an authentic nature-conservation narrative that is among the most powerful booking drivers in the current premium domestic holiday market.

8.5 THE PLANNING PRECEDENT CONFIRMS THE PRINCIPLE

- 8.5.1 The principle of holiday accommodation development at scale in this immediate locality is not in dispute. Wiltshire Council accepted the case on appeal for up to 70 holiday units on land off Spine Road East (PL/2022/04776) and granted consent for 92 holiday lodge caravans at Hoburne Cotswold on the same road corridor. These material precedents confirm that the planning principle is well-established. The present application, for 38 units on a site with superior inherent characteristics and more comprehensive supporting evidence, is consistent with and supported by these precedents.

8.6 THE OUTLINE APPROACH ADDRESSES THE DESIGN REQUIREMENT

- 8.6.1 The 2022 refusal identified design quality appropriate to the Cotswold Water Park as a specific requirement. This requirement is addressed directly through the outline application approach: all matters of layout, scale, appearance, and landscaping are expressly reserved for Reserved Matters determination. No adverse finding on design grounds can properly be made at outline stage where the detailed form of the development is not before the decision maker.
- 8.6.2 The applicant is committed to bringing forward Reserved Matters proposals of the highest design quality, informed by the landscape setting, the SSSI ecological interests, and the competitive market positioning that the site's natural assets demand. The Stage 1 appraisal by Hotel Solutions and Forward Land provides a strategic framework for design that is both planning-appropriate and commercially optimal, confirming that the highest-quality design approach is also the most commercially rational.

8.7 CONCLUSION

- 8.7.1 The evidence assembled in this Statement is comprehensive, independently sourced, and compelling. It demonstrates beyond reasonable doubt that:
1. The planning policy framework, national, development plan, and strategic, supports the principle of high-quality holiday accommodation at Lake 62 in the Cotswold Water Park.
 2. Demand for holiday accommodation at this location is proven, strong, and growing. Current and authoritative evidence runs consistently from national, through regional, to local level, confirming that new supply is being absorbed by growing demand rather than displacing existing trade.
 3. The Lake 62 site possesses a materially unique competitive advantage, its privately owned 7-hectare lake, which positions it at the very top of the Cotswold Lakes accommodation market and addresses identified gaps that no existing operator can fill.

4. The nearby planning precedents, the accepted appeal for 70 units on Spine Road East and the Hoburne consent for 92 units, confirm that the principle of holiday accommodation development at scale in this locality is established.

5. The proposed development will generate approximately £6 million of total annual economic impact and 77 FTE jobs in the local economy, directly delivering the economic objectives of the development plan and national planning policy.

6. The specific requirement identified in the 2022 refusal for robust demand evidence has been comprehensively addressed. The demand for holiday accommodation at this location is proven and irrefutable.

8.7.2 For all these reasons, it is respectfully submitted that Wiltshire Council should grant outline planning permission for up to 38 holiday units and ancillary commercial uses at Lake 62, Cotswold Water Park, with all matters reserved except for the principle of the change of use and means of access.

8.8 KEY FINDINGS, SECTION 8

- The planning policy framework at every level, NPPF (December 2024) paragraphs 85, 88(c), and 11; Wiltshire Core Strategy Core Policies 39, 40, 48, 54, 57; Ashton Keynes Neighbourhood Plan Policy ECP2; and national and regional tourism strategy, positively and consistently supports the principle of high-quality holiday accommodation at this location.
- Demand for holiday accommodation at Lake 62 is proven, robust, and growing. Current, authoritative evidence runs consistently from national level (ONS occupied guest nights up 10.2% to a record 93.8 million in the year to June 2025, while supply also grew), through regional level (growth across every English region), to local level (Cotswold District supply up 32.2% in a year while revenue and rates continued to rise), confirming that new supply is being absorbed by growing demand. The Lake 62 site has unique competitive advantages that position it at the top of that market, and the specific demand requirement of the 2022 refusal has been comprehensively addressed.
- The site's private 7-hectare lake is a materially unique asset within the Cotswold Water Park, the defining competitive advantage that creates an exclusive private-lake experience, addresses three identified gaps in the current market, commands the highest pricing tier, and protects the site's competitive position in perpetuity through the SSSI designation.
- Nearby planning precedents, the accepted appeal for 70 units on Spine Road East and the Hoburne consent for 92 units, confirm the established principle of holiday accommodation development at scale in this immediate locality.
- The proposed development will generate approximately £6 million annual economic impact, 77 FTE jobs, and approximately £1.85 million per year flowing into local food, drink, retail, and activity businesses, directly delivering the rural economic objectives of the development plan.
- Outline planning permission should be granted. All design matters are reserved for Reserved Matters determination. The principle of the use is sound, the demand is proven, the policy support is clear, and the economic benefits are significant. There is no sound planning reason to refuse this application.