

3rd August 2026

Our Ref: SWLC.LPC5806

Development Services – Central
Wiltshire Council
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 0RD

Dear Sir/Madam

Town and Country Planning Act 1990
Land at Penn Farm, Capp Lane, Heywood, Westbury, BA13 4NF

As your planning records will confirm planning permission was recently granted at the above site, pursuant to application PL/2025/08481 for:

‘Extension and alterations to existing storage building to provide meetings / games room, kitchen, toilet and washing facilities in association with on site public camping and associated use of outdoor searing and play space (in part retrospective).’

More recently, in discussion with Mr D Tyrrel from your Council’s enforcement team I am pleased to confirm that he wrote to my client to report that he was satisfied condition No 3 imposed by the above application had been complied with, although of course no formal submission has been made in writing yet. It was also agreed that the cabins now present on site have been placed there and bolted together within the definition of a twin unit caravan pursuant to the Caravan Site Act 1968 (section 13).

The site as a whole has an exempted use as a camping and caravan site, (pursuant to Section 269 of the Public Health Act 1936 (Licence No 648/270/CAMP). The applicant’s land is approved for 10No campsite pitches, which is augmented by the permitted scope for camping over the full extent of the field, pursuant to Part 4, Class BC of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) that allows up to 50 pitches in addition to the ‘fixed’ year round operations.

The nature of the overall site’s permitted use was conditionally referenced at condition No 2 to application PL/2025/08481, tying the approved building’s use to that of the land.

It is the purpose of the enclosed application to simplify matters and seek to establish the permitted scope of use of the land as a full permission. This will also confirm approval for the access track and hardstandings on which the cabins have been

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sited. On the basis a Caravan Sites licence is obtained the surface works would of course be permitted development, but this part of the application proposal is made in retrospect.

By association, the enclosed application will trigger the need to vary condition No 2 referred to above. In that regard I would respectfully suggest that a simpler approach is to clarify with a new condition that notwithstanding the terms of condition No 2 imposed on application PL/2025/08481 that the building therein referenced and brought into operational use by the grant of permission shall be used only in connection with the development hereby permitted, in the alternative to the permitted tolerances.

The enclosed application proposes the use of the application site for the holiday use of 5No caravan structures, placed on their own hardstandings identified, with a shared access track. The rest of the land is proposed for camping use throughout the year, albeit in reality it is expected that the main year-round use, beyond the summer season, will be within the fixed infrastructure, baring those using campervans etc. In that regard mindful of the licenced 10 unit limit my client would be happy to agree that no more than 5 other motorised/caravans units will be placed on the rest of the site throughout the year at any one time.



As the aerial image on the previous page shows the exempted site has been operated to date as a glamping operation with fixed bell tents (8 No shown-although the exemption certificate allows 10), the rest of the mown grass areas have been used for seasonal campers using their own tents etc. The mown areas have been varied each year and although the whole field falls within the red lined application site the quality of the site's attraction is maintained by the flexible sense of space that is available, reducing pressures on the grass lands. It is therefore understood that camping use will continue to be spread out and rotated to reduce pressure on the ground.

The 5No cabins now proposed as the core of the site have a bathroom, kitchenette, bedroom and living space. The chemical toilet will of course still rely on the main toilet block, which as previously explained is connected to an existing package sewage treatment plant, with plenty of capacity as a public venue.

Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004 require that the determination of planning applications must be made in accordance with the Development Plan, unless material considerations indicate otherwise.

Policies

National Context:

National Planning Policy Framework (NPPF)

Planning Practice Guidance (PPG)

Local Context:

Wiltshire Core Strategy (WCS) adopted 2015

CP1: Settlement Strategy

CP2: Delivery Strategy

CP32: Westbury Community Area

CP39: Tourist Development

CP41: Sustainable Construction

CP48: Supporting Rural Life

CP50: Biodiversity and Geodiversity

CP51: Landscape

CP57: Ensuring High Quality Design and Place Shaping

CP60: Sustainable Transport

CP61: Highways

CP62: Development impacts on the transport network

CP64: Demand Management

CP67: Flood Risk

Wiltshire Local Transport Plan 2011-2026

Key Issues

- Principle of Development
- Design and Landscape Impact
- Residential Amenity
- Ecology
- Highways

Principle

Core Policy 39 states that, outside the Principal Settlements and Market Towns, tourist and visitor facilities should ordinarily be located in or close to Local Service Centres, Large Villages or Small Villages, and must demonstrate that landscape and environmentally sensitive sites are appropriately safeguarded. Where proposals come forward in more remote locations, the policy sets out a series of criteria that must be satisfied to justify support. These include demonstrating: (i) that the facilities are genuinely linked to a particular countryside attraction; (ii) that no suitable alternative buildings or sites are available for reuse; (iii) that the scale, design and use are compatible with the wider landscape setting and would not harm landscape character or neighbouring amenity; (iv) that the development is served by adequate access and infrastructure; and (v) that the site has reasonable access to local services and a local employment base.

With respect to criterion (i), the site lies approximately 1.9km from the village of Bratton and the White Horse, which represents a well-established local countryside attraction, and is also located within reasonable proximity of the Principal Settlement of Trowbridge. There is therefore a credible connection between the proposal and nearby visitor destinations within both the rural and urban context. It is of course in any event an established exempted camping facility, so it is not realistic to seek to review matters from first principles.

Nevertheless, as Core Policy 39 of the WCS provides policy criteria that need to be met in order for the council to support tourism and leisure developments outside of settlement limits I trust the following comments are helpful.

Core Policy 39 of the WCS allows for camping accommodation in countryside locations as a general exception and including caravans and what are often referred to as holiday 'pods'. Whilst this policy does not specifically relate to proposals for glamping sites and there are differences between camping and glamping, the use of the site as a whole would still be within the spirit of a camping-type use.

CP39 then requires compliance with parts iii – v (as set out below) and demonstration that 'they can be accommodated without adverse impact on the character and appearance of the landscape'.

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 units and site in question are served by adequate access and infrastructure.

v. The site has reasonable access to local services and a local employment base.

The character here is one of low density and rural. There are no specific landscape or heritage designations covering the site or locality that would lead to particular concerns from the visual effects of the application. Camping is a characteristic of

the countryside and as such it is considered that there is no conflict with local character of the landscape especially given that the proposed establish uses, and well screened location. glamping pods are of sustainable local materials and are located within an existing dip in the topography of the locality.

The general design and scale of the changes do not give rise to any concerns in landscape terms,

It is also relevant that the site already operates as a seasonal campsite under permitted development rights afforded by Part 4, Class BC of the General Permitted Development Order, which allows temporary recreational camping for up to 60 days per calendar year. On this basis, and having regard to Core Policy 39, the principle of the development is considered acceptable.

Paragraph 88 of the NPPF supports economic growth in rural areas with a positive approach to sustainable new development. It states support inter alia for the sustainable growth and expansion of all types of business and enterprise in rural areas and sustainable rural tourism and leisure developments which respect the character of the countryside. The NPPF puts significant weight on supporting businesses and economic growth especially those in rural areas whether or not it is associated with a working farm/comprises farm diversification

Design and Impact upon the upon the character and context of the area

Core Policy 57 Ensuring High Quality Design and Place Shaping of the Wiltshire Core Strategy seeks to ensure that all new development is of high design quality, reflecting local context, character, and distinctiveness.

The development is retrospective and comprises 5No structures provided within the definition of a caravan and finished as shown below, finished in timber boarding below a tar felted pitched roof. This is of course a use of land and not operational development proposal so no elevations are included with the application bundle.



The pitches are set significantly back from the highway and are of course low rise single storey units that have no discernible impact in the public realm, so that they

are principally perceived only once in the site and as part of the established camp site context.

In a countryside context that already includes low-level static homes and agricultural buildings to the east and west at broadly similar separation distances, and alongside a static caravan on the site of comparable height and similar altered form, the proposal reads as part of an established cluster of low-profile structures rather than an isolated or visually intrusive new element. In this regard, the use of the land as of course the application does not involve any built development relates positively to the prevailing pattern of development and local character, as sought by Core Policy 57 in requiring development to enhance local distinctiveness through an appropriate functional response to context, and layout.

In terms of architectural expression and materials, the large areas of timber cladding produce a restrained appearance that is compatible with rural leisure/tourism settings. The limited overall height and simple roof profile temper the perceived massing of the plan, assisting the units to sit comfortably in views filtered by boundary vegetation and neighbouring low-rise structures. Overall, the development is considered to be context-led design, formed of coherent material palettes, and of low visual prominence serving ancillary roles in a rural enterprise. The proposal therefore achieves a satisfactory standard of design and would not harm the character or appearance of the area; it is considered compliant with Core Policy 57.

Amenity

The proposal has been assessed against Core Policy 57 (vii) of the Wiltshire Core Strategy, which requires development to ensure that it does not adversely affect the amenity of neighbouring properties. Paragraph 135 of the National Planning Policy Framework similarly seeks a high standard of amenity for existing and future users.

The units, the subject to this application are located well away from the nearest neighbours. The structures are single-storey, thereby preventing any issues of direct overlooking or loss of privacy. It would not result in material overbearing, overshadowing or visual dominance for nearby occupiers either.

This application concerns only the new pitches and caravan units not the principle of the use of the wider campsite which, as said, operates under permitted development rights (GPDO Part 4, Class BC) for up to 60 days per calendar year, and or under (GPDO Part 5, Class A) for use in conjunction with a site licence. The use of the land as a recreational campsite is therefore effectively established and is not physically expanded through this application. As such, concerns relating to general campsite activities, such as guests arriving, outdoor noise, barbecues or food preparation, cannot be controlled through this application and would occur irrespective of any decision here.

The building the subject of application PL/2025/08481 is already conditionally controlled to maintain its acceptable assimilation and those principles are unaffected by the nature of the enclosed submission. On that basis, the proposal is judged to have an acceptable impact on residential amenity, complying with Core Policy 57 (vii) and the Wiltshire Design Guide.

Transport and Highways

Core Policy 60 of the WCS states that Council will support and encourage safe and efficient movement of people and, where necessary, mitigate the impact of development on transport users and local communities. Core Policy 61 specifies that development should demonstrate that consideration has been given to a hierarchy of transport users and that proposals must, where relevant, serve as a safe access to the highway network. Paragraph 116 of the NPPF states that “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios”.

The WCS, through Core Policy 64, outlines the need for development to comply with a minimum level of parking standards. This is further discussed through the Wiltshire Local Transport Plan, and policy PS4 which identifies that new parking private non-residential developments should not exceed maximum standards, with actual provision negotiated based on accessibility, transport options, site context, and local circumstances.

The previous application of course included details of the site’s overall parking facilities, and these are unchanged by the application proposal on blue land and can be conditionally maintained if the matter needs reasserting. No highway objection was raised and of course the established permitted use reinforces that the application will not materially intensify the traffic movements.

The proposal does not intensify access demands, does not materially alter traffic patterns, and does not introduce new public-facing uses that would increase vehicle movements beyond those already associated with the lawful 60-day seasonal camping activity. The development therefore accords with CP60 by not creating harmful transport impacts; with CP61 as it is safely accommodated on the local road network; and with CP64 as no additional parking or servicing pressures arise. Paragraph 116 of the NPPF is likewise satisfied, as the building does not give rise to any additional transport needs beyond those inherent to the established seasonal activity.

Ecology

The WCS, through Core Policy 50, states that development proposals are expected to avoid and reduce disturbance of sensitive wildlife species and habitats. Biodiversity Net Gain (BNG) was established as a mandatory aspect of planning evaluation through Schedule 7A of the Town and Country Planning Act 1990 (as amended by the Environment Act 2021 Schedule 14).

The application includes an updated Preliminary Ecological Appraisal and notes the retrospective nature of the development sets aside any Biodiversity Gain requirements. Nevertheless, the enclosed report provides enhancement measures to be conditionally controlled and thus satisfying CP50.

For the reasons given I trust the all year use is not objectionable, however, if there are any questions, please do not hesitate to contact me

Yours faithfully



Simon Chambers
Director

Enc.

Cc Mr P Maguire