

Andrew Thomas
Wiltshire Council
County Hall,
Bythesea Road,
Trowbridge
BA14 8JN

Date: 1 September 2026
Our ref: 71637/05/JFB/JC/41381767v1
Your ref: PL/2025/07258

Dear Andrew

Fairwood Lakes Holiday Park: Application for material amendments to permission PL/2025/07258 in relation to the central facilities

On behalf of our client, Terrawise Fairwood Lakes Limited (the ‘applicant’), please find enclosed an application under Section 73 (‘S73’) of the Town and Country Planning Act 1990 (as amended) for amendments to permission ref. PL/2025/07258 in relation to the “central facilities” complex, which is located to the north-east of the application site. Approved plan ref. 523 3002 Rev 04 shows that the guest facilities complex comprises:

- 1 A club house;
- 2 External soft play;
- 3 Sun Canopy area;
- 4 Splash tunnel;
- 5 Main spa building;
- 6 Car Park;
- 7 Toilet Block; and
- 8 Storage shed.

The proposed amendments require changes to the following conditions

- 1 Condition 1 (approved plans) to reflect changes in the layout of and form of buildings at the central facilities complex;
- 2 Condition 2 (Ecology) to update the ecology mitigation plan reference; and
- 3 Condition 3 (flood risk) to update the FRA report reference.

The size of the site and the nature of the 2026 permission relative to the existing holiday park and operations are such that the approved development will now likely progress in phases with the focus first being on the holiday lodges to the south followed by the central facilities complex. Reflective of this, a separate S73 application has been submitted to insert a phasing plan condition and amend the wording of relevant conditions accordingly ('the phasing application'). The expectation is that the phasing application will be determined before this S73 application.

Application Submission

The documents enclosed with this application are listed in appendix 1.

Relevant Planning History

An application was submitted in 2020 to modernise the Fairwood Lakes holiday park and seek the installation of additional holiday lodges, plus new central facilities. The application (ref 20/11097/FUL) granted consent for:

- 1 72 holiday accommodation units (13 camping/caravan pitches, 57 log cabins and 2 holiday accommodation units in the converted barn).
- 2 A new club house and spa.
- 3 A "manager's house", including a shop and office with living accommodation on the first floor.
- 4 Retrospective permission for a variety of sports and play equipment facilities near the club house, including mini golf, a play park, a splash tunnel and sun canopy.

A NMA application ref. PL/2025/09102 (approved 18 November 2025) amended the trigger for condition 10 (Surface Water Drainage) and made condition 13 (Foul Drainage) clearer.

A further NMA ref. PL/2026/00710 (approved 23 February 2026) amended the Description of Development of the 2022 consent to better reflect the approved works (and associated conditions) including making explicit reference to holiday lodges and sports facilities.

Together, these permissions (including the NMAs) constated the '2022 consent'.

Permission PL/2025/07258 granted consent for amendments to the 2022 permission as amended. The amendments focused on changes to the layout of the lodges and did not propose any amendments to the guest facilities complex.

The 'layout S73' (ref. PL/2025/07258) included:

- 1 Re-orientation/re-siting of the units approved by the 2022 consent throughout the site, with no units sited in flood zone 2 or 3.
- 2 2 additional units, both of which have been relocated through this revised submission so that they are outside the flood zone.
- 3 Changes to the layout and the materiality of the 'estate road' to the south. It was for cars (tarmac) and is now for people/private electric buggies (raised walkways/boardwalks).

- 4 Relocation of the railway carriage from the south of the club house to the south-west corner of the site.

Amendments proposed by this application

This S73 application proposes amendments to the guest facilities complex. The changes comprise:

- 1 Expansion of the club house building ('central facilities building');
- 2 Expansion of the car parking provision;
- 3 Two spa pod units to replace the approved spa building;
- 4 The addition of one padel court to the south of the club house;
- 5 Conversion of the proposed toilet block to a second, smaller reception building;
- 6 Siting of a battery storage building to the south of the barn;
- 7 Siting of a transformer building to the north of the barn;
- 8 Introduction of separate buggy parking with canopy, which replaces two proposed lodges that are not to be relocated elsewhere.

These amendments are shown on the drawing listed at Appendix 1 [i.e. the submitted plans] and should be included in an approved plans condition.

There are no amendments to the holiday accommodation and approved plans for the rest of the site should be transferred from the 2026 layout S73 permission to any new consent. For completeness, Appendix 2 provides a list of all plans that should be referenced in a plans condition should permission be granted.

The revised design and layout of the central facilities area of the site introduces minor amendments to enhance the guest experience. This includes the expansion of the club house (now 'central facilities building'), the addition of a padel court and two 'spa pods' that would replace the approved spa building.

Design Changes

The proposed amendments would change the central facilities building from a T-shape to an L-shape, removing, extending the eastern elevation of the building. The building is also shifted slightly to the west to allow for the updated parking arrangements described above. These physical changes enable the creation of a larger restaurant area and internalisation of the previously approved outdoor 'soft play' area. These changes are required to meet the anticipated demands of guests on site of the restaurant and to provide year-round indoor play facilities for families with children.

The form and design of the central facilities building is not materially different to the approved club house, with both being:

- 1 Single storey buildings;
- 2 Finished in a timber cladding;
- 3 Located at the centre of the park;

4 Used for guest services, including a restaurant and bar.

It is recognised that the new facilities building is of a more modern design than the approved club house building. The design has been updated to reflect modern methods of construction and better fit the wider aesthetic of the holiday park. The new design also allows for the installation of solar panels on the roof, which contribute to the wider sustainability of the park. The change in design is not considered to be so significant that it would've changed the decision to approve the original application.

A padel court is proposed to the south of the club house, providing an additional sports facility for guests. NMA ref. PL/2026/00710 updated the description of development to allow for associated sports facilities to be installed on the site. Therefore, this is not a new use. We would anticipate that the detailed design of the padel court can be discharged at the condition stage, as a padel court manufacturer/provider has not yet been found.

In replacement of the current spa building, two spa pods would be situated on a deck fronting Lake 1. This reduces the built form in this area, with the two spa pods being much smaller in size than the larger spa building. This is considered to be an improvement on the approved scheme.

The new battery storage unit and transformer are both located outside of the flood zone and are required to handle the power output from the solar panels that will be installed on every lodge roof. These structures are necessary for the approved lodges to operate as intended, through harvesting power from their solar panels. The units will be utilitarian in design, but the final design is not yet known until a manufacturer is identified. Therefore, it is requested that the design of these units is conditioned. The structures would be hidden from view through appropriate planting and landscaping, the design of which must be discharged under condition 11 of the layout S73 (a condition that we would anticipate being applied to any future consent).

Assessment of the proposed amendments

The Planning Practice Guidance: Flexible Options for Planning Permissions recognises that new issues may arise after planning permission has been granted which require modification of the approved proposals, and that where less substantial changes are proposed, a proposal that has permission can be amended by submission of an application made under S73 to vary or remove conditions associated with a planning permission.

The amendments shown on the accompanying plans will deliver benefits relative to the 2022 consent, including improvements to the overall design of the holiday park to make it more attractive to guests. Since the 2022 consent was granted, the holiday park industry has continued to evolve. The proposed amendments reflect this shift, ensuring the facilities remain competitive and consistent with current market standards.

A revised Flood Risk Assessment is enclosed, which demonstrates that the proposed amendments are acceptable in relation to flood risk.

An Ecological Technical Note is also enclosed, which demonstrates that the proposed amendments are acceptable in relation to ecology and trees.

There has been no change in Local Plan policy since the 2022 consent (as amended). As such, this S73 application continues to accord with the relevant planning policies of the Wiltshire Local Plan including CP39, 50, 51, 57 and 64 that the 2022 consent was assessed against.

Principle of development

The principle of development of was established by the 2022 consent and the approved draing for the guest facilities complex were transferred to the 2026 consent. The scale and scope of the amendments proposed by this application are substantially different.

The new site owners of the site are amending the original permission to meet the increase in demand for on site, high quality guest services and facilities at holiday parks. The proposals as part of this S73 do not introduce any new uses that have not been previously approved under the 2022 consent (as amended). They only adjust the size and layout of those facilities provided, to better addresses changing holiday marker demands and ensure the site can be a successful holiday location in Wiltshire.

Parking

The 2022 consent (ref. 20/11097/FUL) for the site established that the car parking on this site was acceptable from a highway perspective. This S73 seeks to make minor changes to what was the approved scheme, including a slight expansion in the number of car parking spaces. The original scheme approved under ref. 20/11097/FUL secured permission for 69 spaces next to each lodge / pitch plus 48 spaces adjacent to the club house and spa building (totalling 121 spaces).

The layout S73 scheme removed the car parking spaces associated with each unit due to a change in the operational model of the holiday park, opting to use electric buggies to ferry guests to their accommodation. This approach left the 48 spaces adjacent to the club house and spa.

However, upon review of this operating model, there is still a need to provide the same number of spaces per the original permission (as the same number of guests will be arriving). As such, 128 spaces are proposed. This represents an increase of 7 spaces on the original permission.

The changes to the parking on site have considered Wiltshire Core Strategy, in particular, Core Policy 64. The private non-residential parking would be limited to the locally reflective maximum parking standards (except for disabled spaces). Whilst there is no directly comparable use class category listed in the Wiltshire Car Parking Strategy document (Adopted March 2015), the most relevant is the standard for Hotels and Hostels (C1 use) which is 1 space per bedroom plus any requirement for public facilities. Given that the park has approval for 72 lodges, each of which could provide up to three bedrooms for multifamily holidays, it is considered that 128 parking spaces is proportionate.

41 electric buggy parking spaces are proposed, with two covered loading areas near the second smaller reception building. These spaces are necessary to allow the park to operate using its guest pick up and drop off model, which removes guest vehicle movements in the lodge area towards the south of the park, improving guest experience and reducing potential ecological impacts from frequent car movements near, for example, the bar dark corridors. As the buggies would not leave the site, there would be no highway impact resulting from their use at Fairwood Lakes.

Overall, the proposed changes (an increase of 7 parking spaces in comparison to the original permission) would not have a material highway impact compared to the previously approved development and therefore the amended scheme is considered acceptable.

Flood Risk and Drainage

This S73 application is accompanied by an updated Flood Risk Assessment (FRA).

The FRA confirms that the relocated and expanded central facilities building, the battery storage unit, two spa pods and the transformer are located in flood zone 1 and flood risk is appropriately mitigated within the site.

It is anticipated that extant permission condition no. 10 that relates to the drainage and surface water design of the scheme, will be applied to any new S73 permission.

The Flood Risk Assessment submitted by BGP confirms that this development will result in no change to the existing flood risk.

Overall, the changes sought through this S73 application do not have a material impact on flood risk or drainage to the previously approved development and is considered acceptable. The changes to the site and potential flood risks have been assessed against Wiltshire Council's Core Strategy, in particular, Core Policy 67.

Design

Core Policy 39 supports sustainable growth of Wiltshire's tourism sector, recognising it as an important part of the local economy, and supports proposals that enhance existing facilities. The proposed spa pods and padel court enhance the range and quality of facilities available to guests at the site and are considered to accord with the objectives of Core Policy 39.

Core Policy 57 requires development to be sensitively designed, responding positively to and enhancing the existing landscape. The proposed amendments to the central facilities building deliver a more modern design but this is still considered to accord with the objectives of Core Policy 57.

Core Policy 41 supports incorporation of design measures to reduce energy demand and highlights the importance of low carbon energy, particularly for major developments. The proposed battery storage unit and transformer are necessary pieces of infrastructure to ensure the sustainability of the entire site, and deliver the benefits associated with the solar panels that are to be fitted to each approved holiday lodge. In this case, it is considered that the proposed amendments accord with Core Policy 41.

Overall, the proposed changes do not have a material impact on design quality compared to the previously approved development, represent an improvement to the wider park design and are considered acceptable.

Ecology and Trees

This S73 application is accompanied by an Ecological Technical note produced by Rachel Hacking Ecology. It confirms that the new facilities proposals will not impact on Priority Habitat or high-quality

habitat, with only a small part of species-poor plantation woodland, shrub beds and a small amount of ruderal vegetation and marginal vegetation affected.

The proposed ecological enhancement plan has been updated to reflect the new site design and none of the mitigatory measures included within that plan have been affected by the proposed design.

The proposed amendments have been assessed against Wiltshire Core Strategy Core Policies 50 and 51, which relate to landscape and biodiversity respectively.

Overall, the proposed amendments are considered to have a limited impact on ecology and trees compared to the previously approved development, and the amended scheme is therefore considered acceptable.

Conclusion

In summary, the scale of the proposed development is not substantially different to the approved scheme and there will be no material effects arising from the proposed changes. The Development Plan position is the same as when the 2022 consent was approved (and subsequently amended by the 2026 consent). The revised NPPF (August 2026) continues to support the development of tourism sites. In this context, it is considered that the revised scheme is acceptable in planning terms. It remains in accordance with relevant policies within Wiltshire's Core Strategy and the NPPF.

We look forward to receiving confirmation that the application has been validated and trust that you have all the information required to positively determine the application at the earliest opportunity. If you have any queries or wish to discuss any of the above, please do not hesitate to contact me or my colleague Sophie White.

Yours faithfully

Jack Collard

Senior Planner

BSc (Hons) MRTPI

Appendix 1: Enclosed Documents

- Site masterplan – Drawing Number: 523-3023 Rev 04
- Ecological Enhancement Site Plan South - Drawing Number: 523-3005 Rev 07
- Ecological Enhancement Site Plan North - Drawing Number: 523-3022 Rev 03
- Lighting Plan North – Drawing Number: 523-3003 Rev 08
- Lighting Plan South – Drawing Number: 523 3004 Rev 06
- Proposed Club House Building - Drawing Number: 523-IPL-XX-ZZ-DR-A-2-0010 Rev 05
- Proposed Spa - Drawing Number: 523-3102 Rev 01
- Buggy Shelter – Drawing Number: 523-3024 Rev 01
- Updated flood Risk Assessment – BGP: ref. 266116-BGP-01-XX-T-C-01001 Rev 01
- Rachel Hacking Ecology Technical Note, dated 25 August 2026

Appendix 2: Consequential Changes to Conditions 1, 2 and 3 of the 2026 'layout S73' consent

The amendments proposed by this application mean that Condition nos. 1, 2 and 3 of the 2026 consent need to be amended to reflect revised drawing numbers/documents, which for the avoidance of doubt are listed in full below (*denotes plans/documents submitted with this application which supersede and formally replace previous versions):

- *Site masterplan – Drawing Number: 523-3023 Rev 04
- Site Location Plan - Drawing Number: 2626-08 Revision E
- Site Plan as Existing – Drawing Number: 2626-20-05 Revision C
- *Site Plan as Proposed – S73 Masterplan Drawing Number: 523-3023 Rev 03
- *Ecological Enhancement Site Plan South - Drawing Number: 523-3005 Rev 07
- *Ecological Enhancement Site Plan North - Drawing Number: 523-3022 Rev 03
- *Lighting Plan South - Drawing Number: 523 3004 Rev 06
- *Lighting Plan North – Drawing Number: 523-3003 Rev 08
- *Club House - Drawing Number: 523-IPL-XX-ZZ-DR-A-2-0010 Rev 05
- *Proposed Spa - Drawing Number: 523-3102 Rev 01
- Reception, Shop Office & Managers Accommodation Plan if needed - Drawing Number: 2626-20-03
- Timber Lodges - Drawing Number: 2626-13
- Horseshoe Night Roost Structure – Drawing Number: 2626-SK-10
- *New Buggy Shelter Plan: 523-3024 Rev 01

Documents:

- *Updated Flood Risk Assessment – ref. 266116-BGP-01-XX-T-C-01001 Rev 01 dated 20 August 2026 by BGP
- *New Ecological Technical note– dated 25 August 2026 by Rachel Hacking Ecology