



Oswestry and District Civic Society

20/02058/EIA | Use of land part of existing golf course as a static holiday caravan site with associated roads, drainage and ancillary works | Henlle Park Golf Club Henlle Gobowen Shropshire

1. The Oswestry and District Civic Society objects to this proposal. It endorses the comments of Historic England, Dr Paul Stamper and the Shropshire Parks and Gardens Trust concerning the inadequacy of the heritage appraisal of the proposal, and endorses all those objections which conclude that the proposal is incompatible with the historic landscape in which it would be set.
2. Whilst the Society understands the concerns locally concerning traffic flows and safety, and has noted the comments of Mr Smith from his own experience of caravan site operations, it seems that additional traffic generated by the site would be likely to be balanced, in part, by a reduction in golf club membership. The Society is of the view that the proximity of the site to the national rail network would widen its social attraction, bringing the attractiveness of this part of Shropshire to all. It is noted that although the junction of the B5009 with A5 would appear to be a point of hazard, the accident record does not support concerns over a relatively small increase in traffic.
3. Local planning policy applies to tourism developments, and the most relevant would appear to be:
 - a. CS16 which favours tourism as follows: “Development of high quality visitor accommodation in accessible locations served by a range of services and facilities, which enhances the role of Shropshire as a tourist destination to stay. In rural areas, proposals must be of an appropriate scale and character for their surroundings”
 - b. MD11 which permits tourism development where the proposal complements the character and qualities of the site’s immediate surroundings. All proposals should be well screened and sited to mitigate the impact on the visual quality of the area through the use of natural on-site features, site layout and design, and landscaping and planting schemes where appropriate. Further to the

requirements in Policy CS16, proposals for new and extended touring caravan and camping sites should have regard to the cumulative impact of visitor accommodation on the natural and historic assets of the area, road network, or over intensification of the site. Static caravans, chalets and log cabins are recognised as having a greater impact on the countryside and in addition (to 6), schemes should be landscaped and designed to a high quality.

4. There can be no denying that the site forms a part of one of the highest quality landscapes in this part of Shropshire. It follows that to comply with the above policies any development must be of an intrinsically high quality. It does not seem to us that it is possible to argue that this development, which would comprise a largely unmitigated flow of artefacts over the countryside would complement the character and qualities of the immediate surroundings, as it is required to do to be given permission. The caravans proposed are a design which, were they to be buildings would without hesitation be refused planning permission because they failed to meet the requirements (which apply to all development) of part 12 of the NPPF “Achieving well designed places” This states that good design is a key aspect of sustainable development.
5. The applicant points to Government guidance on caravan site licensing. However, the Model Standards <https://webarchive.nationalarchives.gov.uk/20120920035001/http://www.communities.gov.uk/documents/housing/pdf/modelstandards2008.pdf>, state in paragraph 2 that they do not apply to holiday caravan sites. Whether they do or not, they state minimum standards for licensing purposes, and are not a measure of what is acceptable in planning terms. The applicant’s assertion that a separation between vans of 8m rather than the minimum of 6m represents a high standard of development is nonsense.
6. It is not for the Society to say what would constitute a good standard of development. What we are convinced of is that the caravans themselves are not a structure which show any quality in their design. Cumulatively they will never be anything but an eyesore, unless the site is sufficiently well landscaped to break up the cumulative effect, in all probability by allocating each van or pair of vans to its own individually screened location. For this reason it is considered that the proposals fail to meet that part of policy MD11 which guards against over intensification of the site.
7. This proposal, in the view of the Society, comes nowhere near to meeting the requirements of planning policy for high quality in itself (CS16) and for being landscaped and designed to a high quality (MD11). Furthermore it fails utterly to achieve a well-designed place, which is a key aspect of sustainable development (NPPF12)
8. The Society therefore considers that planning permission should be refused.

9. Should the decision maker conclude otherwise, attention is drawn to the 110,e) of the NPPF:

applications for development should: e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations. The site should be equipped with EV charge sockets, since within the life of the development all vehicles are likely to be EVs.

David Ward

Planning adviser to the Society

7 July 2020