



Delegated Report

Planning Application - Tonbridge and Malling BC Consultation

Application no:	20221223
Location:	Badgells Wood Camping White Horse Road Harvel Gravesend ME19 5JQ
Description:	Tonbridge & Malling Borough Council Consultation TM/22/01982/FL - Replacement of existing camp site reception and shop facilities with a new site reception hub; replacement of site manager's mobile home with a permanent dwelling house; erection of a timber dining canopy structure; erection of new ablution block and upgrading of existing facilities, erection of open sided education space shelter; installation of six timber holiday cabins; associated alterations to parking facilities and services infrastructure and the variation of Conditions 1 and 3 of TM/17/00760/FL to enable all year round occupation of the new site manager's house and use of reception hub and timber holiday cabins all year round (camping to remain seasonal)
Applicant:	Tonbridge & Malling Borough Council
Site Visit Date:	25 November 2022

Introduction

This is an application submitted to Tonbridge and Malling Brough Council as the determining authority (ref TM/22/01982/FL) and is a consultation in respect of replacement of existing camp site reception and shop facilities with a new site reception hub; replacement of site manager's mobile home with a permanent dwelling house; erection of a timber dining canopy structure; erection of new ablution block and upgrading of existing facilities, erection of open sided education space shelter; installation of six timber holiday cabins; associated alterations to parking facilities and services infrastructure and the variation of Conditions 1 and 3 Of TM/17/00760/FL to enable all year round occupation of the new site manager's house and use of reception hub and timber holiday cabins all year round (camping to remain seasonal) at Badgells Wood Camping White Horse Road Harvel Gravesend.

The application is submitted by Birling Farms Partnership.

The Site and Surroundings

The application site consists of an area within Whitehorse Wood known as 'Badgells Wood'. It is located on the crest of the North Downs on the south side of White Horse Road, about 700m to the west of Holly Hill. It is located in the countryside to the north of Ryarsh and Birling. Wrangling Lane, which is a track running south from White Horse Road, forms the eastern boundary of the site and is also a Public Right of Way (restricted byway) (PROW). The entrance to the site is on the southern side of White Horse Road towards the centre of the site providing large double timber farm gates.

The site is used for seasonal woodland camping (April to October) following a permission in 2013. The campsite currently provides different areas for clusters of tents in woodland glades, accommodating a total of 50 pitches (2.5 people per pitch). A total of 55 car parking spaces are provided in the main car parking area within the site, with an additional 10 spaces as overflow provision. The existing reception is provided by a container and the site manager occupies a mobile home on the site.

Whitehorse Wood consists predominantly of sweet chestnut coppice with some oak standards, ancient yew and hornbeam. It is commercially managed with the sweet chestnut being coppiced on a rotational basis. The part of the Wood that forms the application site is generally flat and is an area of approximately 9 hectares.

The site is located within the Metropolitan Green Belt and the Kent Downs AONB. The entire site is also within an area of Ancient Woodland and is a designated Local Wildlife Site (LWS). The land to the south and east of the site is part of the Halling to Trottiscliffe Escarpment Site of Special Scientific Interest (SSSI).

The dwelling of Harvel Lodge is the nearest residential property to the application site lying adjacent to the northeast corner of the site on the northern side of White Horse Road. The land to the south and east of the site is a mix of woodlands and open fields that form a designated SSSI area that extends from Whitehorse Wood to Pilgrims Way.

Historically, Badgells Wood was used as a training area for the Royal Artillery during World War II and still contains remains and features of this use including slit trenches, concrete paths, brick and concrete building foundations, concrete tanks and remains of gun positions.

There are no public footpaths running through the site but there are several public footpaths close to the perimeter of the site.

The site is not directly served by public transport with the nearest bus stop located in Vigo Village on Erskine Road, approximately 2.4 km from the existing access to the campsite.

The site has a wide gated vehicular entrance but there is currently no access due to seasonal restrictions.

Relevant Planning History

Planning permission was granted on 29 November 2013 under planning reference TM/13/00547/FL for the use of the area of Whitehorse Wood known as Badgells Wood as a "wild camping" campsite consisting of 50 tent pitches and temporary facilities including an amenities block (toilets, showers and washing units), a static caravan for seasonal occupation by a site warden, a shipping container for office and storage, a water tower and an underground foul waste storage tank. The campsite was granted permission for a temporary period of 4 years up to 31 October 2017 and for use on a seasonal basis between 1 April and 31 October each year.

The Borough Council whilst not raising an objection but did express a number of concerns (GBC ref 20130572) commenting:

The site is within the Green Belt, in the Kent Downs Area of Natural Beauty, in close proximity to the Halling to Trottiscliffe Escarpment Site of Special Scientific Interest, a Local Wildlife Site and part of the site is Ancient Woodland.

There are concerns at the impact of the proposal on the landscape, habitats and the tranquillity of the area. There are also concerns at the amount and type of structures proposed to be erected on the site, which could be considered inappropriate development in the Green Belt, harmful to its openness.

The southern end of the Borough through which the traffic for this campsite is being directed is the only remaining area of tranquillity in Gravesham, according to the 2007 Tranquil Areas map produced by the Countryside Commission and CPRE.

The traffic statement provided with the application reflects this at paragraph 3.8 where it states 'Traffic flows along White Horse Road are very low', (a sample count carried out during the weekday gave a flow rate of approximately 30 vehicles per hour). The statement gives the worst-case highest level of traffic generated by the site to be 17 vehicles per hour (inbound). This assumes an even rate during the 3 hours between 15:00 and 18:00 on a Friday. There will therefore be an impact for short periods at certain times to the occupiers of isolated residences who live on White Horse Road from vehicles going to and from the site.

Areas of tranquillity are important for their recreational and amenity value which it appears this development is trying to promote though, by so doing, it creates a noise impact to existing residents. Noise from traffic is

excluded from action that can be taken under the Environmental Protection Act and so this issue has to be included and taken account of, along with all the other advantages and disadvantages, at the planning application stage to allow a balanced decision to be made.

Please confirm that you have consulted Luddesdown Parish Council.

Permission was subsequently granted on 9 January 2015 under planning reference TM/14/03557/FL for the variation of Condition 3 of the original permission to extend the period of time that the warden's static caravan can be occupied by approximately 2 weeks either end of the campsite's opening period, to between 18th March and 14th November each year.

Permission was then granted on 04 July 2017 under planning reference TM/17/00760/FL for variation of condition 1 (campsite use time period) of planning permission TM/14/03557/FL (Variation of condition 3 to planning permission TM/13/00547/FL to permit campsite use on a permanent basis

The Brough Council raised no objection (GBC ref 20170348)

Details of the Application

Plans/Documents

The application is accompanied by the following documents:

Planning Statement 30 May 2022
Design and Access Statement
Transport Statement
Arboricultural Report
Landscape and visual baseline appraisal
Ecological appraisal
Structure civils report
Various Drawings

The Planning Statement indicates that the proposals are to provide some new campsite facility buildings and to upgrade some existing facilities and the warden accommodation

The application seeks consent for:

- Replacement of existing camp site reception and shop facilities with a new site reception 'hub'.
- Replacement of site manager's mobile home with a permanent dwellinghouse.
- Erection of a timber dining canopy structure, new ablution block and open sided education space shelter.
- Installation of 6 timber holiday cabins
- Associated alterations to parking facilities and services infrastructure.
- Variation of conditions 1 and 3 of planning permission TM/17/00760/FL to enable all year-round occupation of the new site manager's house and use of reception hub and timber holiday cabins all year round (camping is to remain seasonal).

The proposed 6 holiday cabins are to be arranged on existing footings left over from the previous military use of the site. The number of tent pitches currently available within the campsite (50 pitches) will be reduced by the number of cabins proposed (6), to provide 44 pitches.

No additional car parking is proposed as part of the development. 2 parking spaces are to be provided at each cabin for guests, with 4 parking spaces to be provided at the reception hub, to be used by visitors upon arrival. 2 parking spaces at the reception hub will be provided with access to a charging point for electric vehicles at the reception hub.

Vehicular access will continue to be taken from White Horse Road in line with the existing access arrangements.

It is indicated that at peak times, there are up to 6 staff on site per day (3 full time and 3 part-time). 1 staff member stays on site for the duration of the season and the others work a variety of shifts throughout the

day between 9 am and 6pm. It is stated that there will be no increase in staff as a result of the development, although conversely the planning statement indicates in paragraph 4.13 that *the enterprise would provide further local employment opportunities and boost the local rural economy by generating not only income for the Estate but boosting tourist spending locally in pubs, shops, restaurants and similar nearby businesses.*

It is indicated that all of the new buildings proposed have been designed to be constructed from timber and where possible be lightweight structures.

Internal Consultations

GBC Highways Development Management Officer

I do not foresee this application having any significant impact on Gravesham.

In general, I would say this development is not in a sustainable location, and whilst the dwelling may be for an employee on site saving the commute, it is not suited for a family. There are no footways in the area and cycling will not be attractive in inclement weather or in darkness. Assuming that secure cycle parking is provided. I would suggest a one bed or perhaps two bedroom is more appropriate.

Secure and covered cycle (including adaptive) parking should be provided for both the wardens lodgings and new cabins at the rate of one space per bedroom as it is doubtful cyclists would be occupying all the cabins at the same time. Cycle parking should also be equipped with suitable charging provision for cycles with batteries in the frame.

Planning Assessment/Comments

The site is within the Green Belt, in the Kent Downs Area of Natural Beauty (AoNB), in close proximity to the Halling to Trottiscliffe Escarpment Site of Special Scientific Interest (SSSI), a Local Wildlife Site and part of the site is Ancient Woodland. It is not a sustainable location for new development.

It is noted in the planning submission that the applicant recognises that organised tourism uses such as caravan parks and camp sites are held by case law to not represent a form of outdoor sport, recreation or leisure, and as a result, tourism related buildings and structures cannot be treated as 'appropriate development' within the Green Belt.

Any new built development or replacement buildings that are materially larger as in this case are inappropriate development contrary to section 13 of the National Planning Policy Framework (NPPF) 2021. This is also accepted by the applicants.

Conversely a number of very special circumstances are advanced which the applicants argue are compelling to outweigh any harm to openness and functioning relating to:

- The contribution towards tourism and the local economy
- The facilities cannot realistically be provided anywhere else/elsewhere
- Temporary items/chattels would be more conspicuous in both their appearance and siting
- The campsite is a registered site with the 'Duke of Edinburgh Awards' scheme and it is visited by a number of schools every year in connection with this
- The new and improved ablution facilities are desperately needed in order to provide this popular and busy campsite with modern and hygienic toilet and washing facilities to provide suitable levels of hygiene.
- The proposed holiday cabins represent a new, ground-breaking technology as a sustainable method of construction being prototypes for an experimental 'on-site' holiday pod construction.
- The development will support the use of long-distance trails
- The development will help fund improvements to the estate
- The improvements to the campsite facilities will help to support and underpin local jobs
- The site is already developed with concrete bases
- There is a functional need for a manager on site all year for maintenance
- It inspires woodland management and the green economy and conservation

The applicant also argues that the proposals are acceptable in all other respects with no potential harm to

highway safety, local residential amenities, visual amenities, wildlife and habitat or sustainability.

It is considered that some of the matters that are suggested by the applicants as amounting to very special circumstances (such as the site having wartime concrete bases, the use of ground-breaking technology or being a registered site with the 'Duke of Edinburgh Awards' scheme) do not in the GBC Planning Authority's view necessarily amount to very special circumstances that might outweigh the harm to openness, and it will be a fine judgment that Tonbridge and Malling Borough Council will have to make as to whether they conclude that sufficient weight can be given to very special circumstances and whether in their view the harm to openness of the Green Belt or any other harm are overriding considerations.

Tonbridge and Malling Borough Council will need to judge the likely harm to the landscape in what is a landscape area of national significance and the GBC Planning Authority notes and supports the concerns that have identified by the Kent Downs AONB Unit.

The proposals have the potential to impact on the Borough of Gravesham if they result in future pressure to expand the activities on the site and increase further the extent of built development and involve additional traffic on the rural roads within the Borough. Any proposals to remove seasonal use and allow for permanent residential accommodation should be strongly rejected.

The Borough Council would urge that due consideration is given to local opinion and that consultation with and the views of the adjoining parishes within Gravesham and those of neighbouring ward councillors are taken into account.

Recommendation:

That whilst no objection is raised Tonbridge and Malling Borough Council are asked to consider the planning comments above along with those of the GBC Highways Development Management Officer.

Tonbridge and Malling Borough Council are thanked for consulting the Borough Council.

Case Officer:	Mr Peter Price	Team Leader:	Richard Hart
Signed:		Signed:	
Dated:	30th November 2022	Dated:	30 th November 2022

File Location: H: Plan/Typing/General/Peter/Delegated Reports/Uniform - 202211223 - Delegated Report - Badgells Wood Camping Whitehorse Road Harvel - replacement buildings and variation of conditions - T and M consultation