

## Report of Additional Representations

Application Number	23/03136/FUL
Site Address	Land and Woodland South of Watermead Farm Spelsbury Road Charlbury Oxfordshire
Date	5th November 2025
Officer	Kelly Murray
Officer Recommendations	Refuse
Parish	Charlbury
Grid Reference	435351 E 220149 N
Committee Date	17th November 2025

### Application Details:

Change of Use from agricultural to 'glamping' campsite comprising 18 nos. camping units (8 nos. bell tents, 7 nos. shepherds huts and 3 nos. A-frame pods), ancillary facilities (including cafeteria and site reception, 2 nos. toilet and shower blocks, maintenance and storage barn), access and parking, and associated infrastructure

### Applicant Details:

Mr Graeme Widdows  
1 Fortismere Avenue  
London  
N10 3BN  
UK

### Additional Representations:

Comments by Hans Eriksson

#### **Principle**

The application is NOT considered mainly acceptable as it would be in breach of CNP NE5, WOLP EH3 and EH4, paragraph 187 and 193 of the NPPF, and policy CE8 (Nature Recovery and Biodiversity) of the Cotswolds National Landscape Management Plan 2025-2030 as stated both by planning officer and the WODC Ecologist. (The WODC ecologist also mentions NPPF (2024) paragraph 192 but the planning officer has omitted this one).

The application is NOT acceptable as it is not sustainable development as it fails the two of the three fundamental tests in the NPPF for sustainable development: a) economic objective: There is no evidence that the development would provide an economic benefit because a business case has not been provided and there is no employment proposed.

The need for the development has not been demonstrated, and this is particularly concerning as there are already two well established campsites nearby with identical "glamping" type accommodation. These operations always have plenty of availability. There are also an additional 18 campsites within 15 miles of the site , b) social objective: This is not applicable as there are no homes proposed, c) environmental objective: The required ecology cannot be satisfactorily dealt with within this application.

Therefore the application fails on two of the three sustainability tests (and the third is not applicable). CPRE and the Cotswolds National Landscape Board have both also objected. Finally, the application is severely under-consulted as discussed above under 1. It is easy to conclude that these

consultees would have many further objections as they have had for similar planning applications in the Charlbury area (I provided examples of these in original complaint dated 7<sup>th</sup> July 2025).

### **Consultations**

Planning officers have omitted to mention the objections from CPRE and the Cotswolds National Landscape Board. I believe these are both Material Planning considerations and must be read and considered when planning officer is determining the planning application, and obviously also when the Planning Committee is asked to decide on the application

The following consultees have not been asked to respond, even though they should have when comparing other similar planning applications in the area: Thames Water and WODC drainage, Natural England, WODC ENV HEALTH - NOISE & AMENITIES, CONSERVATION & DESIGN OFFICER, WODC ENV HEALTH – CONTAMINATION, NEWT OFFICER, WODC – Leisure and Sports Facilities, Thames Valley police and WODC Tree officer. I do not believe it is possible or advisable to ask the planning committee to decide a severely under-consulted application.

### **Scope of Application**

The Planning officer claims that the 3 A-frame pods have been removed from the application, but there is no evidence of that. Further, placing the accommodation units very close to 20 m plus tall trees without a cleared area of a circle with a radius of 20m around each structure constitutes a very serious health and safety risk, especially as the accommodation units are of a flimsy nature and would never be able to withstand a falling tree. The forest has not been maintained and we have evidence of very large fallen trees on site as previously provided. The planning officer must consider Health and Safety matters when determining a planning application but that has not happened here.

### **Pedestrian path**

The proposed provision of a pedestrian path joining up with where Pound Hill meets the B4026 does NOT provide safe pedestrian access to Charlbury as there is no public footpath between that point and where pavements are available on Market Street. Pedestrians would have to walk up and down the highway on Pound Hill. It is therefore wrong to state that there is safe access on foot to the town.

### **Report inaccuracy**

I quote "The CNP reflects these objectives." No, it doesn't, that is factually incorrect.

### **Conditions**

There is no mention of what conditions might apply to control material amenity such as noise, level and type of music, fire pits/bonfires and the times and scope of operation of the cafeteria building. Planning committee would be unable to decide to approve the application if they were so minded without this information.

There is no mention of what conditions might apply to mitigate fire safety precautions. Planning committee would be unable to decide to approve the application if they were so minded without this information.

### **Environmental Impact Assessment**

The EIA screening as posted on the planning site clearly states in several places that planning officer requires more information before a decision on EIA could be taken. It also states that human waste would be taken off site. There is no evidence anywhere in applicant's documentation that human waste would be taken off site. Therefore, the statement " LPA is of the view that no EIA is required." is incorrect and should be removed and replaced with "The LPA needs additional information in order to determine if an EIA is required".

## Ecology consultation response

The WODC ecologist states in her report dated 07/08/2025 "We would suggest that the 'Woodland Thinning and maintenance proposal' (received July 2025) is disregarded" so I don't understand why it is referenced here.

### Other Policy considerations

It is without a shadow of a doubt the CNP NE5 rules out any development on the site, and we provided you with legal advice on this matter. The Planning Officer correctly states that the CNP is legally part of the development plan in 5.6. It is not possible to disagree with individual planning policies within the development plan as she proposes to do here, as this would be unlawful. The development plan is to be read in its entirety and planning officers do not have the authority to disregard or cherry-pick individual parts of said plan. Planning policies should in the first instance be interpreted by reference to the words used in them in the context of the document as a whole. Only if there is residual ambiguity over their meaning should reference be made to other documents. There is no ambiguity in the NE5 statement "Development Proposals will not be supported in the three CTAs." However, Planning officer argues that a) a previous and unapproved version of the plan should be used. That would be wrong, and b) The WOLP does not define what can be done in a CTA, but it does provide links to Wild Oxfordshire when CTAs are discussed. It is correct that Wild Oxfordshire does not rule out development in CTAs. However it does say in its guidance to planning officers that "However, not all targets are easily defined spatially, and the CTA maps and statements should be read alongside relevant action plans that exist at a local and county level (this may include Local Authority Biodiversity and/or Green Infrastructure strategies, conservation strategies such as [BBOWT Living Landscapes](#) and [RSPB Futurescapes](#) or National Landscape management plans, or Local Plans for specific strategic site policies relating to CTAs)." What this means is that planning officers are duty bound to take into consideration any local plan when determining a planning application in a CTA. This means in this case that the CNP and the NE5 MUST be read and adhered to in its entirety.

The application breaches the following additional planning policies:

- Charlbury Neighbourhood plan ECT4, ECT10
- WODC Local plan E2, E4, EH1, OS2, T1
- Cotswolds National Landscape Management Plan CE1, UE3

Planning officer has ignored all these policies without providing any material considerations why they should be ignored.

