

**22/00083/FUL
MAJOR**

Harlaston (Packington) Ltd

**PATTINGHAM, TRYSUL, BOBBINGTON
AND LOWER PENN**

Councillor Victoria Wilson
Councillor Robert Reade

Patshull Park Hotel Golf And Country Club, Patshull Park Burnhill Green WV6 7HR

A development of similar nature to this now before Planning Committee for determination was presented to members on the 25th April 2023. At this committee officers recommended refusal for:

- Demolition of the modern hotel extensions and removal of hard standing car parking, retention and resetting of the Grade II* listed Temple and siting of 62 lodges, construction of Central Facilities Building (CFB) and associated access, parking and servicing

The reasons for refusal presented to members were:

1. The site is within the Green Belt and the proposed development is considered to be inappropriate development as set out in policy GB1 of the adopted Core Strategy. The development is therefore harmful to the Green Belt, contrary to policy GB1 of the adopted Core Strategy
2. The Local Planning Authority has considered the reasons advanced but does not consider that these reasons constitute the very special circumstances required to clearly outweigh the harm to the Green Belt by reason of inappropriateness.
3. The proposal would cause harm to a number of designated Heritage Assets including the character of the Grade II listed Park and Garden as well as the setting of the Grade I listed Hall, Grade II* listed Temple and Grade II boathouse. Any public benefit is would not outweigh the harm contrary to Local Plan policy EQ3 and Part 16 of the NPPF. Insufficient evidence has been presented that demonstrates the proposed used is the optimum viable use and that the development is necessary to secure the economic viability of the site.
4. The Veteran trees on site, of which there are a significant number will need to effectively be isolated from casual access by residents. Retaining Veteran trees in high usage areas carries an inherent risk that needs to be managed. Simply providing extra space around them is not sufficient and it is unclear as to whether this has been given ample consideration; even if adequate provisions were made however, there is then the question of whether this in turn would have further impact on the character of the Brownian landscape. Such a high intensity development of the site would only lead to the long term degradation of a high value tree stock contrary to local plan policy EQ4 and Part 15 of the NPPF.
5. In sufficient detail has been submitted to demonstrate suitable mitigation measures for Great Crested Newts will be carried out under a European Protected Species Licence (EPSL). The applicant has not provided a suitable mitigation method statement for the site, which must prove to the Council that the applicant is likely to be granted an EPSL

Members at the planning committee having considered all the matters raised were minded to overturn the officer recommendation to refuse and progress with approval, but this was subject to a legal agreement to secure definitive rights of way across the site from the village of Pattingham. Work was also required to secure a license for Great Crested Newts.

Following this minded to grant resolution officers from the District Council and County Council walked the site to establish the most effective and usable public rights of way to be secured through the Highways Act. During this exercise it was established that there was already in place a permissive path “The Millenium Path” from the village to the site. This information was not known at the time by officers or relayed to members of the planning committee at the time who voted on the recommendation. Significant weight was given to the creation of a path in the planning balance.

Further to the planning committee meeting and upon engaging in discussions with the applicant/agent regarding proposed planning conditions, it became clear that significant variations with regards to the design, finish and scale of the lodges proposed existed between the Council and the proposed future occupier of the site. Members were advised that the lodges were of temporary construction, meeting the terms of the Caravan Act. This was not the proposed lodge design or parameters required by the end user of the site.

Since the planning committee in April 2023 a screening opinion has also been undertaken with regards to an Environmental Impact Assessment. Following assessment an EIA was not required.

Finally, a holding objection from the Highways Authority (Shropshire Highways Authority) has been addressed.

It was therefore deemed appropriate to carry out a further round of consultation. The outcomes of this consultation are set out in the Report and should be taken into account along with the original consultation responses.

Given the number of new factors that have arisen through the further information provided since the last planning committee the decision was made by officers, to debate the full merits of the proposals at a further planning committee prior to a decision being issued.

This report is presented to members to consider the merits of the development in full based in the latest set of plans. No decision was issued following the planning committee in April 2023 and as such this proposal needs to be considered on its own merits.

Proposed development:

Demolition of the modern hotel extensions and removal of hard standing car parking, retention and resetting of the Grade II* listed Temple and siting of 59 permanent holiday lodges (6No 1 bedroom, 27No 2 bedroom, 20No 3 bedroom, 4No 4 bedroom, 2No 4 bedroom with associated tree house which each include a further ensuite bedroom) and 3No staff lodges each with 3 bedrooms. Construction of a Central Facilities Building (CFB) used as reception, café, shop and toilet for guests with an office and meeting room for the site team. Use of the existing maintenance building and associated access, parking areas and servicing.

Pre-commencement conditions required:	Pre-commencement conditions Agreed	Agreed Extension of Time until
n/a	n/a	01 March 2024

Date of site visit – 7th September 2022

1. SITE DESCRIPTION AND APPLICATION DETAILS

1.1 Site Description

1.1.1 Patshull Park lies in an isolated rural area to the south of the A464 and the A41, and the nearest settlement is Patteringham to the east. The site encompasses a redundant hotel and golf leisure complex that forms a smaller section of the land around Patshull Hall, a Grade I listed Georgian mansion. The land around the hall was formed into formal gardens and pleasure grounds in the late 17C and was altered in each century since, including by Capability Brown, extending to around 83 hectares. This area of land is a designated Historic Landscape Area and is a registered Grade II Historic Park and Garden (RPG) by English Heritage for its special historic interest.

1.1.2 The RPG is made up of a number of large lakes and pools, a number of historically important and designated listed buildings as well as veteran and younger trees, some of which are self-seeded and some which were planted for the golf course landscaping and some for the Brownian landscape. The western branch of the Hall's Y shaped Great Pool had a Doric temple (Grade II*) built on the bank of the southern tip in the mid-18th Century. Brick wings were added to this around 1840 and in 1980 it was incorporated as part of the hotel's main entrance. The hotel and golf club closed in July 2020. The hotel building consists of 49 en-suite bedrooms, swimming pool, gym, beauty salon, conference facilities for 250, a restaurant, a bar, lounge and seminar rooms. The hotel also has a wedding licence and there are around 200 parking spaces.

1.1.3 The application site measures approximately 20ha in area and is a smaller part of the overall RPG which is generally being split into 'north and south', with the two divided by part of the Great Pool with a wooden bridge connecting them. The hotel and car parking lies in the southern half of the site with the access track leading from Patshull Road in the very southern corner with access being made over the pool on an ornamental bridge. A small building that is utilised by an on-site fishing business is found not far from the site entrance. The access track splits after the fishery building and car park, with an arm extending North up to St Mary's Church and a further leading east to the hotel.

1.2 SITE HISTORY

Planning Applications

00/01130/FUL Greenkeepers facilities **Approve Subject to Conditions** 20th December 2000

01/01034/LBC Relocation of Grade 2 listed wall, gate piers and gates to boundary of Patshull Hall and Hack Cottage **Approve Subject to Conditions** 20th December 2001

01/01237/FUL Extension to gymnasium at first floor level over balcony and alterations **Approve Subject to Conditions** 9th January 2002

01/01238/LBC Extension to gymnasium at first floor level over balcony and alterations **Approve Subject to Conditions** 9th January 2002

01/01263/FUL Use of existing escape staircase to create 2 meeting rooms and new external escape staircase **Approve** 9th January 2002

01/01264/LBC Change of use of escape staircase to create 2 meeting rooms with new external escape staircase **Approve** 9th January 2002

76/00981 Amenity Centre **Approve Subject to Conditions** 19th January 1978

76/00982 Recreational

77/00047 Recreational **Approve Subject to Conditions** 19th January 1978

96/00951 Irrigation Lagoon And Realignment Of Track **Approve Subject to Conditions** 18th February 1997

87/01149 Conversion Of Courtyard To Functions Room Office And Store **Approve Subject to Conditions** 7th April 1988

87/00673 Erection Of Bedroom Block **Approve Subject to Conditions** 14th November 1987
85/01055/FUL Extensions To Hotel To Provide Bedroom And Recreational Facilities **Approve Subject to Conditions** 16th June 1986
96/00021/LBC Removal Of Glazed Screen And Erection Of Wall To Form Meeting Room **Approve Subject to Conditions** 10th September 1996
78/01408 Golf Course Storm Shelter And Associated Toilets For Occasional Use **Approve Subject to Conditions** 6th December 1978
76/00981/COU Change Of Use for recreational/sporting activities **Approve Subject to Conditions** 19th January 1978
81/00535 Erection Of Buildings In Connection With The Use Of The Land As A Recreational Centre **Withdrawn** 28th January 1981
97/00273 Sewage Treatment Plant **Approve Subject to Conditions** 10th June 1997
97/00987 Pump House For Irrigation Lagoon For Golf Course **Approve Subject to Conditions** 6th January 1998
76/00982 The Erection Of Buildings In Connection With The Use Of Land As Part Of An Amenity Centre For Recreational And Sporting Activities 19th January 1977
77/00047 Erection of buildings in connection with new use of land as recreational/sporting centre 12th October 1977
88/00885 Extension To Form 4 Additional Bedrooms **Withdrawn** 11th April 1989
89/00566 4 Bedroom Extension 14th November 1987
90/00342 Erection Of Golf Clubhouse Ancillary Buildings And Car Parking **Approve Subject to Conditions** 24th April 1990
04/00183/FUL Retention of 4 shallow fairway bunkers on current holes of golf course **Approve** 26th May 2004
86/00001/LBC Extensions To Hotel To Provide Bedroom And Recreational Facilities **Approve Subject to Conditions** 16th June 1986
87/00032/LBC Erection Of Bedroom Block
87/00045/LBC Conversion Of Courtyard To Functions Room Office And Store
88/00033/LBC Extension to form 4 additional bedrooms **Approve Subject to Conditions**
89/00021/LBC 4 bedroom extension **Approve Subject to Conditions**
83/00044/ADV Advance Sign **Withdrawn** 15th November 2018
11/00319/FUL Extension to provide 18 new, en-suite guest bedrooms [revival of 673/87] **Refuse** 13th June 2011
11/01018/FUL 16-bedroom extension [revival of 673/87] [resubmission of 11/00319/FUL] **Approve Subject to Conditions** 2nd February 2012
12/00064/LBC 16-bedroom extension to existing hotel complex **Approve Subject to Conditions** 12th March 2012
12/00064/COND Discharge of condition nos: 3 (12/00064/LBC) **Approved by Letter** 5th December 2014
11/01018/COND Discharge of conditions nos 3 (11/01018/FUL) **Approved by Letter** 19th November 2014
22/00084/LBC Removal of modern hotel to provide for the retention and resetting of the Grade II* listed Temple, pending consideration.

1.3 Pre-apps

21/00024/PREAPP Siting of 133 holiday lodges and the demolition and re-development of Patshull Park Hotel, including a new facilities and spa building and the restoration of the temple and re-instatement of the historical park and grounds – unacceptable 23rd March 2021

2. APPLICATION DETAILS

2.1 The Proposal

2.1.1 The scheme as amended will see the erection of fifty nine self catering holiday lodge buildings and three staff static caravans predominately spread across the northern section of the south half of the existing golf course, beyond the site of the existing hotel, terminating at the southerly side of the Great Pool. The scheme would be for 100% holiday rental. The lodge buildings will be flat packed and assembled on site and will sit on a steel frame which in turn sits on a concrete piled foundation. The lodge buildings are of modern design with perpendicular pitched roofs and are timber clad on the external elevations. Each plot would have a fairly large decking like structure attached to the principal elevation that would allow for access and outdoor socialising/seating which would also be home to a hot tub. The design of the four bed lodge buildings includes a first-floor extension that exceeds 6.8m in height and the tree houses being some 6.2m in height. Generally, the holiday lodge buildings have a total right height of around 5.5m.

The holiday lodge mix is as follows:

6 x 1 bed cabin = **66 sqm**
26 x 2 bed cabin 84 sqm = **2184 sqm**
1 x 2 bed wheelchair 93 sqm = **93sqm**
20 x 3 bed cabin 100 sqm = **2000sqm**
2 x 4 bed cabin with tree house (104 + 43 + 26 = 173 sqm) = **346sqm**
4 x 4 bed cabin 147 sqm = **588sqm**

2.1.2 The existing hotel building would be demolished, and the listed Temple structure would be retained.

2.1.3 The proposed Central Facilities Building (CFB) would be erected not far from the site entrance. The design of this building is modern with contrasting roof pitches and timber cladding. The building would measure 7 metres in height to main ridge and 3.8m to eaves. It would house the reception, a small café, staff facilities and a meeting room totalling around 278 sqm.

2.1.4 Towards the north west corner of the site, an existing machinery store used in association with the golf course would be converted and used for housekeeping and general maintenance. Three static caravans are also proposed for the use by staff located to the south of the general maintenance building. Each static caravan would measure around 12m by 5.8m totalling 70 sqm floor area.

2.1.5 The application proposes an ongoing maintenance scheme for the grounds and a footpath linking the far northern site to the village of Pattingham that both the users of the site can use, as well as members of the public.

2.2 Applicants Submission

2.2.1 The following documents have been submitted:

- Planning Statement
- Design and Access statement
- Heritage Statement
- Historic Building Assessment – The Temple
- Historic Environment Desk Based Assessment
- Conservation and Heritage Management Plan (draft)
- Landscape and Visual Appraisal and Green Belt Assessment

- Noise Assessment
- Flood Risk Assessment and Drainage
- Site Waste Management Plan
- Market Review of Accommodation Options
- Preliminary Ecological Appraisal Report
- Ecological Impact Assessment
- Biodiversity Metrics
- GCN Method Statement
- Business Case and Economic Assessment
- Viability Letter
- Demand and Economic Impact Analysis
- Example Construction Management Plan
- Example Operational Management Plan
- Patshull Park Hotel & Country Club
- Transport Statement and Travel Plan
- Arboricultural Impact Assessment and Method Statement
- Tree Removal Plan
- Tree Protection Plan

Various Updated and addendums to existing reports to address amendments to the scheme and consultee comments

3. POLICY

Within the West Midlands Green Belt, Registered Park and Garden and various listed properties (Designated Heritage Assets) multiple protected trees.

3.1 Core Strategy

Core Policy 1: The Spatial Strategy

Policy GB1: Development in the Green Belt

Core Policy 2: Protecting and Enhancing the Natural and Historic Environment

Policy EQ1: Protecting, Enhancing and Expanding Natural Assets

Policy EQ3: Conservation, Preservation and Protection of Heritage Assets

Policy EQ4: Protecting, Expanding and Enhancing Natural Assets

Policy EQ5: Sustainable Resources and Energy Efficiency

Policy EQ7: Water Quality

Core Policy 3: Sustainable Development and Climate Change

Policy EQ9: Protecting Residential Amenity

Core Policy 4: Promoting High Quality Design

Policy EQ11: Wider Design Considerations

Policy EQ12: Landscaping

Core Policy 7: Employment and Economic Development

Policy EV1: Retention of existing employment sites

Policy EV2: Sustainable tourism

Core Policy 9: Rural Diversification

Policy EV6: Re-use of Redundant Rural Buildings

Core Policy 11: Sustainable Transport

Policy EV11: Sustainable Travel

Policy EV12: Parking Provision

Core Policy 13: Community Safety

Policy CS1: Designing Out Crime

Core Policy 14: Open Space, Sport and Recreation

Policy HWB2: Green Infrastructure

Statutory duty set out in Planning (Listed Buildings and Conservation Areas) Act 1990 that requires that special regard be given to the desirability of preserving listed buildings and their settings.

3.2 National Planning Policy Framework [NPPF Dec 2023] – to be read as a whole, but specifically:

Achieving sustainable development

Requiring good design

Protecting Green Belt land

Meeting the challenge of climate change, flooding and coastal change

Conserving and enhancing the natural environment

Conserving and protecting the Historic environment

Decision taking pre-application engagement and front loading

3.3 Constraints

Newt - Impact Risk Zone Amber Name: AMBER ZONE:

Newt - Impact Risk Zone Green Name: GREEN ZONE:

Newt - Impact Risk Zone White Name: Impact Risk Zone White:

Listed Building Listed Building Ref: 11/154B

Grade: Grade II Listed Building

Group Details: NGV

Date of Listing: 28/03/1985 00:00:00

Listed Building Listed Building Ref: 11/160

Grade: Grade II*

4. CONSULTATION RESPONSES

All consultation periods have expired unless noted otherwise.

All comments detailed below relate the recent amendments ONLY unless otherwise specifically referred to in consultee responses.

Site Notice Expires	Press Notice Expires
4 th December 2023	5 April 2022

Pattingham Parish Council

Received 1st February 2024

in light of receiving new information from the applicant:-

Original Motion to be withdrawn:-

- *It was agreed to refuse the changed application on the grounds that:-*
- *Where the original plan was to use half of the golf course, they now want to reduce the area with the same no of lodges.*
- *The original lodges were traditional small log cabins that could be moved, and they are now proposing 6.6m tall 2 storey cabins that are fixed.*
- *All the facilities that were in the previous approved application for local people to use gym / restaurant has been taken out of this new application, and this needs to be in the application so there is a benefit to the residents of the area.*
- *All the Veteran trees need to be protected on the site.*

It was noted that the applicant has permission for 62 lodges, with leisure facilities and they are now asking for a change to the permission. The Parish Council were asked by SCC / Applicant for comments on the proposed footpath / bridle path changes, which we made comments to change the route, as the

one proposed was a path to know where, the comments have not been taken into account which were to make the path to walk easier to the site for future staff and residents from the area of Pattingham and Patshull.

New recommendation

Following the presentation from Mr Mercer to address the parish council and explained how and why the development has changed since the initial parish meeting.

Mr Mercer has volunteered to increase the footpaths and redirect a proposed bridle path that the council thought was a health and safety issue for the parishioners. The parish council expressed concern that they were not consulted by the footpath officer but if the changes are included they would drop their objections.

As a parish council subject to the footpath changes above now support the proposal.

Local Plans Team

Received 21/12/2023

Emerging Local Plan update

In January this year, work on the review of our new Local Plan was paused awaiting clarity from the government on proposed changes to national planning policy. However, the Council has now announced that it is resumed work on the plan and is anticipating undertaking a new public consultation in Spring 2024.

Principle of Development

2012 Core Strategy

Core Policy 1 - The Spatial Strategy for South Staffordshire

The proposed development is outside of any settlement and development boundary. For development outside of service villages, the relevant section of the policy states:

'The rural regeneration of South Staffordshire will be delivered through the implementation of the following Spatial Strategy. The principal aim will be to meet local needs, whilst recognising the constraints that impact upon the District, and support and improve infrastructure and service delivery in the District.

Throughout the District, growth will be located at the most accessible and sustainable locations in accordance with the Settlement Hierarchy set out below and the Council will work with partners to deliver the infrastructure, facilities and services required to support this growth. An integral part of the Strategy will be to protect, maintain and enhance the natural and historic environment and the local distinctiveness of the District and retain and reinforce the current settlement pattern'

For outside of service villages:

'Outside the service villages, the objective of the Spatial Strategy is to protect the attractive rural character of the countryside where new development will be restricted to particular types of development to meet affordable housing needs, support tourism, provide for sport and recreation and support the local rural economy and rural diversification.'

The policy goes on to state that for development within the Green Belt and Open Countryside:

'The South Staffordshire portion of the West Midlands Green Belt as defined on the Policies Map, will be protected from inappropriate development and proposals will be considered in the light of other local planning policies and the policy restrictions relating to Green Belt in the NPPF, however the Council will consider favourably sustainable development which accords with this Spatial Strategy.'

Proposals to support tourism are listed as a potential type of development which may be acceptable outside of service villages. However, proposals would also need to comply with the aim of the overall strategy aims including the protection of the attractive rural character of the countryside. The site is also within the Green Belt and would need to comply with the relevant Green Belt policies as discussed below and other development plan policies.

The site is remote from services and facilities with the nearest settlement being Pattingham which is a Local Service Village over 1.5 miles away. This Journey would be along Patshull Road which is unpaved and without street lighting and would not be an attractive walking / cycling route to most users. Public transport options to the site are extremely limited with the nearest bus stop being 2.7km away and railway station 12km. Future visitors would be mostly reliant on private motor vehicle to travel and from the site and during their stay.

The application is supported by a travel plan and D&A Statement which set out measures which could be implemented to reduce private car journeys in favour of more sustainable transport methods. The applicant also makes the case that the proposed use would generate less trips than of the previous use of the site as a hotel and golf course.

Green Belt - Policy GB1: Development in the Green Belt and National Green Belt Policy

The site is within the West Midlands Green Belt. The proposals do not fall within the list of 'exceptions' within Policy GB1 or national policy and would constitute inappropriate development in the Green Belt. As stated in paragraph 147 of the NPPF: 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances'.

It is acknowledged that the proposal would include the demolition of the existing hotel and removal of hardstanding. However, the introduction of the lodges, Central Facilities Building and associated infrastructure will create a dispersal of built form across a much larger area which is currently void of build development. This will have a clear impact upon the openness of the site taken as a whole.

The Planning Statement make a case for VSC - this includes:

- 1. Protection and Enhancement of Heritage*
- 2. Previously Developed Land (PDL) and the Green Belt*
- 3. Sustainable Economic Benefits*
- 4. Public Benefits*
- 5. Visual Containment, Landscape Enhancement and Biodiversity*

Heritage and landscape impacts

The application references heritage benefits of the proposed scheme. With the proposed development enabling the management of the historic parkland and facilitating access to the general public for them to enjoy. The application also states that the development would enable the restoration of heritage assets including the Temple.

Although these heritage improvements / benefits are acknowledged, they would be facilitated through the introduction of the lodges and associated infrastructure. This development would therefore significantly change how the historic parkland is appreciated and potentially cause harm to the heritage assets.

Advice received from the Council's heritage consultant and Historic England should be considered.

Tourism

Policy EV2: Sustainable Tourism

The Planning Statement highlights the benefit of tourism and the associated economic benefits of the proposal. The application also advocates that these benefits as contributors towards the VSC case in order to approve development within the Green Belt.

The most relevant parts of Policy EV2 state:

'The Council will support the growth of tourism in South Staffordshire consistent with the heritage and cultural associations of the District including attractive villages and hamlets, historic houses, parklands and gardens with particular focus given to the promotion of sustainable tourism. In accordance with the Council's Tourism Strategy, the aim will be to raise the profile of South Staffordshire as a visitor destination.'

And

'Outside development boundaries it will be necessary for a business case to be made, which identifies how the development will support and make a sustainable contribution to the local economy. Priority will be given to reuse and conversion of redundant buildings rather than new build. The provision of tourist accommodation, including the location of static and touring caravans, will only be permitted if it does not adversely affect the character and appearance of the area, taking account of the capacity of the local area and the highway network to absorb the development.

Development proposals should be consistent with other local planning policies.'

The application is supported by a Business Plan and Draft Operational Management Plan with the applicant stating that Forest Holidays have a legally binding agreement with the landowner.

Policy EV2 offers support to tourism within South Staffordshire. However, as set out in the policy, proposals should not have an adverse effect on the character and appearance of the area. Any other harm including that to the Green Belt must also be considered.

Planning Balance

As previously stated, the development would constitute inappropriate development in the Green Belt. As stated in paragraph 147 of the NPPF: 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in 'very special circumstances'.

The decision taker will need to form a judgement whether the application has demonstrated the VSC and overall harm to the Green Belt. The introduction of the holiday lodges and associated infrastructure would also have a significant impact upon the parkland settings with significant heritage and landscape impacts.

It is acknowledged that there are several benefits associated with the proposal including: increased tourism and associated economic benefits of spend in the local area, economic benefits through employment (both ongoing and during the construction phase), specific heritage benefits and public benefits such as the opening of the parkland to the public and continued management.

Overall, the decision maker will need to weight the above matters (including any identified conflict with the Development Plan) and any other relevant factors in the planning balance.

Senior Conservation Officer

Received 7th December 2023

Amended plans have been received for the site. Based upon this information, I would make the following additional comments:

The large boat house has been removed from the site, which will leave the Temple building isolated in the landscape as it was originally. This change to the scheme is welcomed in heritage terms, however, there are still objections to the other elements of the scheme.

Whilst the overall number of structures have been reduced as part of this amendment to the scheme, the structures that are now proposed are far more permanent. Originally the application was for 100 lodges, the proposed 62 cabins will have a greater detrimental impact upon the heritage assets. These lodges are spread across the area and are brought close to the access drive. This visual intrusion into the landscape has a greater impact upon the perception of the open parkland on access through to towards the Hall and Church. Whilst some changes have been undertaken in line with previous discussions, it is a shame that alternative locations for the cabins in less sensitive parts of the land within the ownership of the applicants have not been brought forward.

There are also a significant number of trees proposed to be planted across the area to screen the cabins. This in itself is harmful to the original character of the area, which as a man-made landscape is characterised by open areas with groups of (and individual) trees and larger plantations. Whilst the golf course has eroded the character of this part of the park, that is not a justification for further harmful changes.

It is noted that there are significant changes to the Great Pool (outside of the red line) which will require significant engineering works. It is not clear what this change is for and why it is proposed. The Great Pool is a man-made feature and is associated with the works carried out by Capability Brown in the C18. I would have concerns with the proposed changes based upon the information that I have seen in relation to this part of the scheme.

Based upon the changes that have been put forward, whilst there are some elements that have been improved, overall the impact of the 62 permanent cabins within the landscape will cause less than substantial harm to the character and appearance of the registered park and the setting of the listed buildings. Therefore, the proposed scheme should not be supported in its current form on heritage grounds.

Senior Arboricultural Officer

Received 28th November 2023

Having reviewed the application and supporting information I can confirm that I am not able to support the proposed development and must therefore raise an objection.

The Brownian landscape, of which the proposed development site is a part, has a number of defining features amongst which, unsurprisingly, are the many trees present.

As would be expected of a high amenity tree stock, all specimens of significance on site are covered by SSDC Tree Preservation Order No. 146/1995.

Whilst the proposed layout has been designed so as to minimise the immediate impact of development on the trees, keeping removals to a minimum and providing space around veteran specimens for example, it is the longer-term pressures that are of concern.

As well as the risks to the nominal root protection areas from the construction phase itself, including a particularly extensive network of underground utility runs to service the large number of lodges, there will then be the issues arising from usage of the site thereafter.

Despite dedicated vehicle access to the lodges being provided, it is inevitable with a development of this nature that vehicles will be operated in areas where they should not be from time to time. This will arise due to the concentrated layout of the lodges and their proximity to retained trees.

In addition, the general footfall in the area will increase significantly over that which occurred when the golf course was operating, or that would occur if the site were to revert to open parkland usage.

This change and increase in site usage will result in significant ground compaction which will be extremely detrimental to the long-term health of the tree stock. Semi and Early Mature successor trees will see their future growth halted, while the potential damage to the veteran specimens on site will be particularly devastating.

The other long-term pressure that would arise from the creation of a holiday park comes from the requirement of such facilities to fulfil their duty of care.

With so many lodges, paths, driveways and other facilities in such close proximity to retained trees there will be a requirement to implement a far more intensive safety inspection and maintenance regime. Another inevitability, arising from these inspections, would be the lowering of the bar for what would constitute an undue risk. Subsequently, there would be a corresponding increase in pruning works required, resulting in negative impacts on tree health, amenity value and a general degradation of the asset currently protected by the extant Tree Preservation Order.

It is also the case that the Veteran trees on site, of which there are a significant number all requiring special planning consideration, will need to effectively be isolated from casual access by residents. Retaining Veteran trees in high usage areas carries an inherent risk that needs to be managed. Simply providing extra space around them is not sufficient and it is unclear as to whether this has been given ample consideration; even if adequate provisions were made however, there is then the question of whether this in turn would have further impact on the character of the Brownian landscape.

In consideration of the above points, it is my opinion that such a high intensity development of the site would only lead to the long term degradation of a high value tree stock.

It is in light of this that I raise my objection to the proposal.

Senior Ecologist

Received 10th January 2024

I have significant concerns regarding the long-term impacts of the proposed development to veteran trees on site and I concur with the findings of the County Ecologist in her previous comments on this application, as well as those made by the Arboricultural Officer.

The increased footfall around the veteran trees will likely lead to increased compaction over time, as well as an increase in requirement to manage/prune trees and remove deadwood which is a key feature of veteran trees, as well as a habitat and food source for saproxylic and saprophytic invertebrates. The submitted documentation provides no permanent protection for veteran trees on site, and I cannot see how this impact is proposed to be mitigated or appropriately managed in the long-term without detriment to veteran trees and the species associated with them.

Section 5.4 of the arboricultural impact assessment and method statement states "Occasional removal of dead wood or other remedial works to address significant defects may be required in areas of frequent access. This is unlikely to be overly onerous and will be the responsibility of the tree owner. This will not represent a significant change from the current situation on site."; I concur with the Arboricultural Officer's comments that the change in use of the site would almost certainly require an increase in the frequency of health and safety inspections and would likely lead to inappropriate removal of dead wood and other pruning of veteran trees which are key features of veteran trees and species associated with them. There is further concern that the installation of services may occur within the root protection areas of veteran trees, and no certainty has been given that this would not be the case.

I have reviewed the great crested newt method statement and am satisfied that it adequately addresses impacts to great crested newts as well as any reptiles that may be present within the working area. I have provided comments on the consideration of the three tests further in this consultation.

Policy and Legislative context in relation to this application

The National Planning Policy Framework (2023) s.180 states: "Planning policies and decisions should contribute to and enhance the natural and local environment by: ... d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures"

NPPF s.186 states that "When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused... c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists"

South Staffordshire Council adopted Core Strategy policy EQ1: Protecting, Enhancing and Expanding Natural Assets states that permission will be granted for development that would not cause significant harm to species that are protected or under threat and that wherever possible, development proposals should build in biodiversity by incorporating ecologically sensitive design and features for biodiversity within the development scheme.

South Staffordshire Council adopted Core Strategy policy EQ4: Protecting and Enhancing the Character and Appearance of the Landscape states "Trees, veteran trees, woodland, ancient woodland and hedgerows should be protected from damage and retained unless it can be demonstrated that removal is necessary and appropriate mitigation can be achieved."

The Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended); along with the Protection of Badgers Act 1992, provide the main legislative framework for protection of species. In addition to planning policy requirements, the LPA needs to be assured that this legislation will not be contravened due to planning consent. In addition to these provisions, section 40 of the Natural Environment and Rural Communities Act 2006 places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the

purpose of conserving biodiversity. Section 41 refers to a list of habitats and species of principal importance to which this duty applies.

Natural England Standing Advice which has the same status as a statutory planning response states that survey reports and mitigation plans are required for development projects that could affect protected species, as part of obtaining planning permission.

European Protected Species (to include in Committee/Delegated reports as an Annex, not on Decision Notices)

The Local Planning Authority in exercising any of their functions, have a legal duty to have regard to the requirements of the Conservation of Species & Habitats Regulations 2017 which identifies 4 main offences for development affecting European Protected Species (EPS).

- *Deliberate capture or killing or injuring of an EPS*
- *Deliberate taking or destroying of EPS eggs*
- *Deliberate disturbance of a EPS including in particular any disturbance which is likely to:*
 - I. impair their ability to survive, to breed or reproduce, or to rear or nurture their young, or*
 - II. in the case of animals of a hibernating or migratory species, to hibernate or migrate; or*
 - III. to affect significantly the local distribution or abundance of the species to which they belong.*
- *Actions resulting in damage to, destruction of, or obstruction of an EPS breeding site or resting place.*

Ecological survey results indicate that European Protected Species, specifically great crested newt and bats are present. Direct impacts to the bat roosts on site will be avoided and no consideration of the Habitat Regulations is necessary in that respect. However, suitable great crested newt will be affected and a licence from Natural England will be required, therefore further consideration of the Conservation of Species & Habitats Regulations is necessary.

A High Court judgement ruled that local authorities must consider all applications where European Protected Species are likely to be affected and a European Protected Species license required, by considering the 3 tests applicable to the Habitats Directive. The ruling stated the following:

"When dealing with cases where a European Protected Species may be affected, a planning authority... has a statutory duty under Regulation 3(4) to have regard to the requirements of the Habitats Directive in the exercises of its functions. Further the Directive's provisions are clearly relevant in reaching planning decisions, and these should be made in a manner which takes them fully into account ...".

The three tests are that:

- 1. The activity to be licensed must be for imperative reasons of overriding public interest or for public health and safety;*

The first test is usually evidenced with grant of planning permission where imperative reasons of overriding public interest can be demonstrated (proportionate to the impacts of the scheme to protected species), usually through compliance with local planning policies. It is for the applicant to demonstrate the 'need' for the development and this has been set out in the planning and listed building statement.

- 2. There must be no satisfactory alternative; and*

The applicant must demonstrate that there is no satisfactory alternative to the proposals that would deliver the same 'need'. It is noted that alternative options are presented on section 3.2 of the planning and listed building statement.

- 3. The favourable conservation status of the species must be maintained.*

The mitigation strategy provided by the applicant is sufficient to maintain the favourable conservation status of the population of great crested newts at the site through a dedicated receptor area and long-term management of habitats for newts.

It is therefore considered likely based on the information provided that Natural England would be reasonably likely to grant a European Protected Species Mitigation Licence.

County Highways

Received 4th December 2023

Recommendation Summary: Acceptance

Site Visit Conducted on: 23-Nov-2023

Informative for Decision Notice.

This Form X is issued on the assumption that the developer enters into a Section 106 Agreement to secure the following:

- Travel Plan Framework with Outcomes and Measures and £15,000 towards the travel plan costs.

Notes to Planning Officer.

i). The above comment relates purely to the effects of the development on roads for which Staffordshire County Council is the Highway Authority. For consideration to be given to the effects of the development at the access and surrounding highway network, it will be necessary for you to consult Shropshire Council.

ii). This Form X supersedes previous dated 4th November 2022.

iii). This Form X is issued on the assumption that the amount of proposed lodges is reduced from 100 to 62.

iv). The increase in the amount payable for the monitoring of the Travel Plan is due to the current rates.

Lead Local Flood Authority

Received 7th February 2024

No objection subject to a pre commencement condition requiring that a fully detailed surface water drainage scheme for the site has been submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority. This is to prevent flooding by ensuring the satisfactory storage of and disposal of surface water from the site.

County Archaeologist

Received 21st November 2023

Thank you for consulting with Staffordshire County Council's Historic Environment Team with regards to the additional information submitted in support of the above applications. I have reviewed the amended application and do not have anything to add to our previous response on this application (dated 23/06/22) which remains valid. I will defer to the knowledge and experience of Historic England and your Conservation Officer colleague with regards to the potential impact of the proposals on designated heritage assets.

Comments from 23rd June 2023

Amendments have been made to the proposed scheme following previous comments. However, based upon the changes made there are still concerns with the proposed development, which shouldn't be supported in heritage terms.

Whilst the scheme will result in the listed Temple building being separated from the current hotel complex, the other changes proposed will cause harm to the setting of the Temple, the Grade II listed boathouse and the parkland surroundings in general.

It is acknowledged that the lodges have been moved further from the Temple, however they will be still clearly visible within its context. The benefit of removing the modern structures from the temple is counteracted by the significant harm caused to its wider setting. There are still other large structures being built close to the lake to the south of the temple which will have a detrimental impact upon its setting.

There are still significant conservation concerns with regards to the proposed impact of the development in terms of the numerous significant heritage assets. Based upon this I cannot support the application which creates less than substantial harm (be it at the higher end of the spectrum) to significant heritage assets, without providing the heritage related public benefits to outweigh this harm.

Historic England

Received 7th December 2023

Thank you for your letter of 13 November 2023 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

Historic England Advice

As you are aware, we have previously provided comments on the above application in our letters dated 26 January 2023, 11 March 2022 and 7 June 2022, and with specific reference to Masterplan C in our letter dated 10 November 2022.

We note the additional and amended materials submitted including in particular the updates to the Heritage Impact Assessment by SLR. Our position remains as set out in previous correspondence, we consider insufficient weight has been afforded to the holistic and kinetic experience of the designed landscape (how one experiences it as a whole, moving through it, as well as from singular viewpoints). Further to the approach set out in our GPA3 Setting of Heritage Assets impacts need to be considered in respect of the Grade II registered Park both in its own right and as designed setting to the Grade I listed Patshull Hall and the Grade II listed Church of St Mary.*

Having reviewed all the submitted information Historic England continues to be unable to support the proposals on heritage grounds, and would refer you to the detailed advice and recommendations in our previous letters.

Recommendation

Historic England has concerns regarding the application on heritage grounds as expressed in our previous correspondence.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Comments from 11th March 2022

Summary

Historic England considers the current proposals to be over intensive, and would cause harm to the significance of the Grade II Historic Park and Garden and the Grade I Patshull Hall and its setting, the

significance of the Grade II listed Temple and its setting, and the approach and context of the Grade II* listed Church of St Mary.*

We are therefore unable to support the current applications.

Further detailed analysis and understanding of the site within the context of the Hall, the historic circulation routes and wider parkland setting would be helpful as part of any future proposals.

Historic England Advice

The Patshull estate of is of some considerable pedigree. Built for the honourable Sir John Astley between 1754 and 1758, the impressive Patshull Hall was designed by one of the preeminent architects of the day James Gibbs, and is set within grounds laid out by the great landscaper Lancelot 'Capability' Brown for Sir George Pigot on his return as Governor of Madras for the East India Company.

Reflective of this considerable architectural and historic importance and notable associations, this extremely fine country house is listed Grade I. Only 2.5% of all listed buildings warrant this highest of statutory grades.

The surrounding estate boasts all the hallmarks of a Brown landscape with its formal pleasure grounds awash with separately listed garden features and structures, not one but two feature lakes including the expansive Great Pool, and sweeping parkland crisscrossed with riding and carriageway routes, affording set views and vistas to amuse and delight.

As such the surrounding landscape not only contributes positively to the significance of the Hall and its setting, it is also designated in its own right as a Grade II Registered Historic Park and Garden.

The application site is located to the south of the Hall across the Great Pool, and is flanked to the west by an important access route to both Patshull Hall and the Grade II Church of St Mary. Although used more recently as a golf course and hotel complex the application site is still clearly perceived as part of the wider parkland landscape showcasing the prominently positioned Grade II* Temple folly.*

The Patshull estate is therefore a complex and sensitive series of nationally important buildings, structures and integrated landscape. As such the proposed creation of 100 holiday lodges, a facilities building, parking, servicing etc requires the utmost deliberation.

With this in mind, we would refer you to the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the National Planning Policy Framework. As you are aware the Act requires that special regard be given to the desirability of preserving listed buildings and their settings.

Section 16 of the NPPF further highlights the need to fully understand the significance of a heritage asset in order to assess the impact, and potential harm, of new development. Local authorities are also instructed to identify and assess the particular significance of any heritage assets, including by development in their settings, to avoid or minimise any conflict.

Furthermore, there is an expectation within the NPPF that great weight be given to the conservation of a designated heritage asset, and any harm to, or loss of, that significance including from development within its setting, should require clear and convincing justification. Where harm does occur, this must be weighed against the public benefits of the proposals.

Section 12 of the NPPF is focused on achieving well-designed places, and states that planning decisions should ensure that development adds to the overall quality of an area; is visually attractive as a result of good architecture, layout and appropriate and effective landscaping; is sympathetic to local character and history including surrounding landscape setting, and establishes or maintains a strong sense of place. Development that is not well designed should be refused.

The application site occupies the southern section of the Patshull Hall parkland landscape, and is flanked to the west by an important access route to Patshull Hall, and the Grade II Church of St Mary. Within the site is the 18th century, Grade II* Temple folly, and an early 19th century boathouse which is listed Grade II. We also note from the application that there is evidence of potential remains of a road of at least mid-18th century and a ride of at least early 19th century.*

Follies, such as the classically inspired 18th century Doric Temple (possibly designed by Gibbs), were key features of such grand designed landscapes. These picturesque, extravagant architectural features were intended to be focal points of interest generating curiosity and delight, to be glimpsed across the lake or come up 'by chance' on walks and rides through the parkland grounds. Often, as is the Temple they are elevated, and were intended to be seen in splendid isolation. From the evidence found of the former circulation routes, and the historic maps, it is clear that the Temple and this part of the parkland, was an important part of the designed landscape.

Therefore, whilst we welcome the removal of the late 20th century hotel accretions from the Temple, we do not agree that the proposed swathe of lodges, extensive car parking, access roads and large central facilities building would be 'highly beneficial' as suggested by the Historic Building Assessment.

Clearly the hotel complex and golf course has resulted in some change to this area of the park. However, as noted within the Historic Building Assessment much of the character and appearance of the former parkland landscape is retained. The introduction of such extensive development would severely compromise the existing open, green landscape, resulting in a far more intensive, built character. As such this would not only dramatically impact upon the registered park and garden, but would also harm the significance of the associated listed buildings and their setting.

We therefore consider that the current proposals would harm the significance of the Patshull Historic Park and Garden and as such the setting of Patshull Hall, the significance of the listed Temple and its setting, and the approach and context of the listed Church of St Mary.

No clear and convincing justification has been provided within the application and, in our view, there are limited heritage benefits to offset the harm identified. As required by the NPPF, it is necessary to weigh any harm identified against the public benefits of the proposals. Clearly this is the role of your authority. However, we would emphasis that this should be a very high bar.

Given that the application site is an existing golf course and hotel complex Historic England is not opposed to the principle of some further development. However, we are concerned that the current proposals are far too intensive. Additional analysis and understanding of the contribution of the application site to the wider parkland, the kinetic experience of the landscape from the historic routes and rides, and the relationship of the Temple to views and vistas from the pleasure grounds and Great Pool would be helpful in formulating any future proposals for this important site. Any future scheme should also consider the reinstatement and celebration of the historic circulation routes through the parkland.

Recommendation

Historic England is unable to support the current proposals on heritage grounds.

We would therefore recommend that the applicant works with your conservation adviser to bring forward a less intensive scheme, more sympathetic to the character of the historic park and the significance of the surrounding listed buildings and their settings.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

The Gardens Trust and Staffordshire Gardens and Parks Trust

Received 10th December 2023

Thank you for consulting The Gardens Trust and Staffordshire Gardens and Parks Trust about the latest revised details for this proposed development. As with previous correspondence SGPT is responding on behalf of both Trusts in accordance with agreed working arrangements.

Some of the additional information has attempted to address concerns previously expressed by the Trusts. This includes the reduction in the number of chalets proposed; their confinement to the north end of the site leaving the southern end undeveloped; the reduction in size of the central facilities building and its relocation on the site; and the introduction of an experienced holiday park management company with a commitment not to sell any of the chalets individually and what appears to be a responsible management regime. However none of these changes are sufficient either in themselves or collectively to overcome and resolve criticisms raised earlier by the Trusts.

Patshull Park is a grade II Registered Park and Garden of 17th century origin the present extent and appearance of which and now largely derives from 18th century interventions influenced by Lancelot "Capability" Brown. This is most manifest in the Great Pool and its adjacent setting which encompasses the application site. Map evidence submitted by the applicants in their revised Heritage Statement shows that this area was historically laid out as wood pasture, that is to say open grassland interspersed with individual trees or clumps with an open eastern boundary to the Pool. While it is accepted this area has been disturbed by the laying out of the former golf course its essential wood pasture character survives and is capable of reconfiguration without recourse to the type of drastic remodelling and built development envisaged in this application. In particular the extensive new planting shown in the revised Masterplan in the northern area and along the lakeside is wholly incompatible with and harmful to its historic open character and appearance (it is noteworthy that the chosen operators' experience as evidenced in its sales literature is in woodland or forest settings, not open parkland). The introduction of new roadways, chalets, car parking and outdoor lighting will more resemble a housing development than features appropriate to an historic designed landscape. While the cladding of the chalets is recessive in colour their individual massing is large and in the case of the two storey units, inelegant. This, allied to the tall, repetitive monopitch roofs, will give the new structures considerable and unwelcome prominence in the open landscape pending any new tree planting reaching maturity. The use of uPVC fenestration is inappropriate in a heritage location. The proposed staff accommodation in oversized caravans will be out of place in the historic landscape. No drawings have been provided of the proposed new reduced size facilities building.

In short the new and additional information is insufficient to ameliorate the harm which this development would cause to the historic landscape or override the Trusts' fundamental opposition in principle to siting a holiday park within this grade II Registered Historic Park and Garden.

While the application continues to offer some heritage benefits as in the removal of the modern hotel and renovation of the grade II listed Temple the Trusts still consider that overall, the proposals would*

cause substantial harm to the various heritage assets and their setting. The Trusts maintain their OBJECTION to the proposed development.

Capability Brown Society
9th January 2024

Objection

This further submission of the Patshull park Masterplan C revision D dated 31 October 2023 reduces the initial number of lodges from 100 to 62 and which are now closely clustered in the north of the application site with a 'Forest retreat' building and just two lodges in the southern area and which was also shown on revision C. There is no significant site plan changes to the objection TCBS made in November 2022 to revision A of the masterplan. The design of all the lodges, however, has changed. As previously stated the Forest Retreat building is poor and unsympathetic to the site particularly in such a prominent location given that the proposed development shifts far closer to the historic access road to Patshull Hall and St Mary's Church. As also stated previously the relocation of so much development provides welcome open land around the listed temple and to the south, where the former hotel would now be demolished and the lake shore line restored, but the impact of the proposals on the historic access road would now be greater than previously and the visual loss of openness, and any appreciation of the Capability Brown setting, particularly to all those entering the site, would result in even greater harm and is not helped by the inappropriate design of all the lodge buildings.

The scheme continues to have the character of a dense caravan park rather than a discrete rural retreat. There is constant reference in the documents to this being a 'forest retreat' with forest lodges and illustrations in the documentation of buildings in a forest environment and the operator is 'Forest Holidays'. This site is not, however, a forest but an open registered park and garden, and, as such, requires a totally different design approach to a dense holiday village hidden in a forest. The new design of the lodges is very poor and completely out of character for a relatively open parkland site in a Grade II Registered Park and Garden. They would be more suited to a dense woodland site, much the same design (it seems) as those shown in the Forest of Dean illustrated on page 17 of the Construction Management Plan. Furthermore, the very close clustering of the lodges is completely unacceptable. In a number of instances separation of views between principal rooms between lodges is under 10m distance resulting in a complete lack of privacy. The two tree houses shown on plan bizarrely have no trees near them and the 4 bedroom lodges are unacceptably bulky and 6.1m in height.

Other Objections are:

- 1. No proper landscape plan is submitted to demonstrate how privacy between lodges is maintained. The masterplan only shows proposed new tree planting with no specifications on tree size or species. This is unacceptable for a scheme submitted in a registered park and garden*
- 2. There is no landscape management plan setting out how the historic pastoral character of the parkland might be reinstated and managed. This is required for review as part of the submission and not as a planning condition.*
- 3. There appears to be no foul drainage scheme submitted.*
- 4. There appears to be no comparative schedule of proposed building footprints and gross external floor areas with the existing. The masterplan suggests a vast increase in both.*

5. An economic case for so much development and its viability as a rural retreat does not appear to have been submitted. There appear to be limited recreational possibilities on this site, and site limited privacy. What exactly is the attraction?

6. The viability of the 'Forest Retreat' building might also be questioned. Each cabin appears to have generous kitchen and dining areas so would the Retreat building cafe and bar be used?

As previously stated TCBS challenge the very basis of the proposal for so many holiday lodges on this site which would be contrary to all planning policies on Green Belt land, would irretrievably damage the heritage status of the site, would be intrusive to neighbours and, with such a concentration of lodges, would not offer the high quality quiet holiday accommodation described in the application statements. There are therefore no wholly exceptional, or even new exceptional circumstances, that would now be considered to override the substantial harm that these new proposals would cause.

Shropshire Highways Team

Received 14th November 2023

Following review of the amended application Shropshire Council raise no objection but would attach the following condition on any permission granted.

Condition

Traffic Management Plan

No development shall take place, including any works of demolition, until a Traffic Management Plan for construction traffic has been submitted to, and approved in writing by, the local planning authority, to include a community communication protocol. The approved Statement shall be adhered to throughout the construction period.

Reason: To avoid congestion in the surrounding area and to protect the amenities of the area.

We have reviewed the transport report as part of 22/00083/FUL and see that there is a reduction traffic movements which would result in a further reduction due to the amended scheme.

Shropshire Conservation Team

Received 9th January 2024

I don't have any specific comments on this one other than to agree with the most recent comments from Historic England.

Naturespace

Received 28th November 2023

Response: Licence Required

*Recommendations: Updated**

The applicant has submitted a great crested newt mitigation method statement: Great Crested Newt Method Statement, SLR consulting LTD, July 2023.

Should the council be minded to approve the planning application, they will need to consider whether the three derogation/licensing tests are likely to be met in accordance with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended) and Natural England Standing Advice.

If the council decides that these tests are likely to be met and that a European Protected Species Licence is likely to be forthcoming after planning permission has been approved, then the full implementation of the great crested newt mitigation statement would need to be secured as a condition of planning consent.

Alternatively, the applicant still has the option to use the Council's District Licence for great crested newts. Currently, the applicant has submitted an enquiry from NatureSpace but has not formally joined the District Licensing Scheme. If the applicant does wish to use the Scheme, it would be advantageous to do so prior to the determination of the application to avoid having to go back into the planning system at a later date.

Further information on the District Licensing Scheme administered by NatureSpace can be found at www.naturespaceuk.com

**For previous comments please see prior consultee response (18/03/2022).*

Conclusions:

The applicant has submitted a 'Great Crested Newt Method Statement, SLR consulting LTD, July 2023' and has chosen to obtain a European Protected Species Licence from Natural England after planning permission.

South Staffordshire District Council must whether the 3 derogation tests are likely to be met before a positive determination of the application. These tests are as follows:

- 1. The proposal must be of imperative reasons of overriding public interest;*
- 2. There must be no satisfactory alternatives; and*
- 3. The favourable conservation status of the species must be maintained*

The council must therefore satisfy themselves that a European Protected Species Licence is likely to be forthcoming or potentially refuse the application on ecological grounds should the application fail to meet the requirements of these tests.

If the Council concludes that the 3 tests are likely to be met, then the full implementation of the great crested newt mitigation statement must be secured as a condition of planning consent.

We therefore recommend that the council should consult with their in-house or external ecological advisor to assist with the consideration of the 3 tests and whether the great crested newt mitigation strategy is sufficient or not.

The applicant does still have the option of joining the District Licensing Scheme now or at a future point in time should the need arise. The required planning conditions can be attached to planning permission via a Non-Material Amendment or Variation of Condition application.

Thank you again for consulting us and please contact us with any queries, we are always happy to help.

Public consultation responses

57 consultation responses were received. These included 38 letters of support and 15 letters of objection. The comments are summarised below.

Comments of support

- This proposal will provide opportunities for work and leisure to locals, it will attract visitors to the area and boost the economy.
- This development with its lodges and central facility will ensure that the Park is well maintained and enjoyed by many.
- Improved public access to a valued Capability Brown landscape which has hitherto been inaccessible to the public and has not formed a part of the local visitor economy offering.
- It opens up more of the Patshull estate for walkers and the like. It provides for proper vehicular access to St. Mary's Church, which is a problem at the moment.
- Application restricts the lodges to the south end of the Park so that the present environment around the old Patshull Hall and Wildcote is maintained.
- Pleased to see that the access to Patshull Church is to be improved.
- The proposed lodges are tastefully designed with very modest density whilst the intention to restore Capability Brown's vision is highly laudable.

- The proposed development has the potential to increase the number of people visiting St Mary's Church and thereby income for its maintenance and long-term viability.
- The proposals is better than what is currently there.
- tradespeople who would benefit from employment in construction and development and jobs for local youngsters in the gym, restaurant and wider complex would mean the world to the village.
- Comments praising the management of the Patshull estate under the current owner.
- Gives both local people and people from further afield the opportunity to enjoy the countryside in such a beautiful area.
- Proposed public footpath would be useful and take walker off the roads which are dangerous.
- Would bring business to Pattingham and Dartmouth Arms.

Comments of objection

- Will have a seriously harmful impact on the appearance and significance of the historic designed landscape. Their axial north-south distribution along a roadway running through centre of the former wood pasture at the heart of the one-time golf course is not compatible with its location within the Green Belt
- development by reason of its size, density and lack of consideration to the Green Belt site contravenes this policy and would have an unacceptably adverse impact on the local environment.
- plastic wood effect on the lodges and artificial grass is unnatural and does not protect the listed landscape.
- The plan offers nothing to Pattingham and surrounding area to compensate for the inevitable increase in traffic.
- I am concerned about increases in traffic in Pattingham village and along Patshull Road. Fast moving traffic is a risk to cyclists, horse riders and walkers. Additional traffic would increase this risk and add noise pollution.
- No realistic public transport options.
- limited visibility from right and left exiting five properties along Patshull rod near the village end. Concerned by increased traffic/ and footfall along here.
- Light pollution from chalets and the paths etc having to be lit at night.
- A smaller hotel, with a spa and swimming pool open to the public would be much preferable, together with the retention of the existing beautiful golf course.
- Questions over the economic sense of the project and whether it will be successful as there is already a larger similar site at Astbury park, Bridgenorth.
- Rather unique part of historic landscape will be changed forever.
- The 5 year of works is a long time for disruption to residents.
- Renovating the hotel and ideas put forward such as including a swimming pool, using as a wedding venue, a farm shop.
- Impact on peace and solitude that the environment currently offers.
- Impact of construction on the identified species within the site. Muntjac deer. Owls, bats
- The proposals would set a precedent for further development within the site and further north toward the hall.
- Any type of lighting, low level or otherwise, will create light pollution which in turn will affect the numerous nocturnal animals. Increase in footfall will destroy habitats.
- Would cause harm to trees.
- Concerns regarding the impact on St Mary's Church as vehicle access is proposed up the western boundary. How will this be managed?
- Increased footfall will affect the privacy of Patshull park residents.

Other comments

- I do hope that the historic aspects of the park are properly protected.
- Clear signage is needed to ensure that visitors are aware that there is no through road between the golf course and Patshull hall.
- I would encourage possible investment in a safe cycle path as well.

5. APPRAISAL

5.1 Key Issues

- Principle of development
- Level of harm to the openness of the Green Belt
- Does the proposal conflict with the purposes of including land within the Green Belt?
- Case for very special circumstances
- Impact on Heritage
- Impact on highways
- Impact on Ecology and veteran trees
- Drainage
- Impact on neighbours

5.2 Principle of the development

5.2.1 The site is located in the West Midlands Green Belt. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

5.2.2 Both Core Strategy policy GB1 and the NPPF notes the construction of new buildings other than for agricultural or forestry purposes is generally considered to represent inappropriate development. The lodge buildings proposed here are of permanent construction and would be considered as buildings. The considerations in this report shall be based on this conclusion.

5.2.3 Core Strategy policy GB1 is silent on the issue of sites within the Green Belt that are previously developed (brownfield land); i.e. land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole curtilage should be developed). However, the supporting text to policy GB1 states that development within the Green Belt will normally be permitted where it is acceptable "within the terms of national planning policy". It therefore follows that for any development to be acceptable any proposal must comply with the provisions of the NPPF. In addition to this where the local plan is silent, then the NPPF is a material consideration.

5.2.4 Paragraph 154(g) of the NPPF specifies that for the construction of new buildings, limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purposes of including land within it than the existing development is an exception to inappropriate development in the Green Belt.

5.2.5 Does section g) of paragraph 154 apply here?

5.2.6 The NPPF offers a definition of previously developed land in the glossary stating:

Land which is or was occupied by permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry infrastructure; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

5.2.7 In that the application site consists of buildings, a large expanse of hard standing as well as a golf course, it is considered that it does comprise a site that has been previously developed. As the proposal involves demolition, rebuilding, new construction and an entirely new use, it is for the complete redevelopment of the site. Therefore, it is considered that the second bullet point NPPF paragraph 154(g) is engaged and it has to be demonstrated that the complete redevelopment of previously developed land would ‘...not have a greater impact on the openness of the Green Belt than the existing development’.

5.2.8 when considering impact on openness is the existing built form on site. The applicants have provided a breakdown of floorspace:

- The existing hotel provides around 7380 sqm. This would be demolished.
- The proposed 59 holiday lodge building and 3 staff lodges (caravans) provide around 5487 sqm
- There is to be a facility building that provides around 278 sqm.

5.2.9 This would result in a reduction of built form of around 1615 sqm. However, the existing hotel is concentrated around the listed temple that was part of the overall estate belonging to Patshull Park. The temple was set on a ridge and the hotel building has been built around it, enclosing it to the rear and sides. The building is mainly single storey (but with a pitched roof) to the south of the temple with two storey elements to the west and south sides. It is therefore contended that the existing built form is currently concentrated in one small part of the site. Furthermore, the current built form of the hotel is located discreetly in the landscape and the main bulk of the building cannot be viewed until one is well within the site.

5.2.10 The proposal would introduce 59 holiday lodge buildings that would sprawl across the northern part of the site, starting some distance away from the listed temple, and reaching all the way to the top of the site, to where the lake splits into two arms. The lodge buildings would be accessed by a main artery road with the lodge buildings scattered sporadically. Every building would sit on an individual plot with two parking spaces and each unit would be provided with mains water, electric, foul drainage, piped gas, TV and WiFi through an internal private network of services. Each plot would have a fairly large decking like structure attached to the principal elevation that would allow for access and outdoor socialising/seating which would also be home to a hot tub. The design of the four bed lodge buildings includes a first-floor extension that exceeds 6.8m in height and the tree houses being some 6.2m in height. Generally, the holiday lodges have a total right height of around 5.5m. As well as the lodge buildings, the proposal would also see the introduction of an amenity building towards the entrance to the site in a prominent location.

5.2.11 The proposal for 59 lodge buildings, amenity building, and the associated infrastructure would introduce built form of significant scale across a wide area, which is currently undeveloped. The

proposed amenity building would be located in a prominent location and along with the sprawl of the lodge buildings would result in a greater impact on the openness of the Green Belt than the existing development, which is concentrated in one part of the site, located discreetly in the landscape where the main bulk of the building cannot be viewed until one is well within the site.

5.2.12 The proposal is inappropriate development and therefore harmful to the Green Belt by definition and should not be approved except in very special circumstances (VSC). Paragraph 153 of the Framework states, *'When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.*

5.2.13 Consideration of whether VSC exists includes, first of all, consideration of Green Belt harm which is the definitional harm identified above, harm by way of impact on the openness and the purposes of the Green Belt and any other non-Green Belt harm. The following sections set out that harm and then, whether other considerations clearly outweigh that harm, to determine whether VSC exists.

5.3 Level of harm to the openness of the Green Belt

5.3.1 Paragraph 142 of the NPPF states that, 'The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence'.

5.3.2 There has been much dispute in recent years in case law in defining openness. A defining case in *R (Timmins & Anr.) v Gedling BC & Anr.* helps to define whether the visual impact of a development could be taken in account in considering 'openness'. It was held that 'openness' is characterised by the lack of buildings but not by buildings that are un-obtrusive or screened in some way. It was also held that 'openness' and 'visual impact are different concepts', although they could 'relate to each other'.

5.3.3 The PPG (last updated December 2023) with guidance on factors taken into account when considering the potential impact of development on the openness of the Green Belt. These include, but are not limited to:

- openness is capable of having both spatial and visual aspects - in other words, the visual impact of the proposal may be relevant, as could its volume;
- the duration of the development, and its remediability - taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
- the degree of activity likely to be generated, such as traffic generation.

5.3.4 *R (on the application of Samuel Smith Old Brewery (Tadcaster) and others) (Respondents) v North Yorkshire County Council (Appellant)* (2020) states, 'The concept of "openness" in para 90 of the NPPF seems to me a good example of such a broad policy concept. It is naturally read as referring back to the underlying aim of Green Belt policy, stated at the beginning of this section: "to prevent urban sprawl by keeping land permanently open ...". Openness is the counterpart of urban sprawl and is also linked to the purposes to be served by the Green Belt. As PPG2 made clear, it is not necessarily a statement about the visual qualities of the land, though in some cases this may be an aspect of the planning judgement involved in applying this broad policy concept. Nor does it imply freedom from any form of development. Paragraph 90 shows that some forms of development, including mineral extraction, may in principle be appropriate, and compatible with the concept of openness. A large quarry may not be visually attractive while it lasts, but the minerals can only be extracted where they are found, and the

impact is temporary and subject to restoration. Further, as a barrier to urban sprawl a quarry may be regarded in Green Belt policy terms as no less effective than a stretch of agricultural land."

5.3.5 The proposal would introduce 59 holiday lodge buildings that would sprawl across the northern part of the site. The design of the four bed lodge buildings includes a first-floor extension that exceeds 6.8m in height and the tree houses being some 6.2m in height. Each plot would have a fairly large area of decking with a hot tub. Generally, the holiday lodges have a total right height of around 5.5m. The proposals include a main artery road to access the lodge buildings. As well as the lodge buildings, the proposal would also see the introduction of an amenity building towards the entrance to the site in a prominent location.

5.3.6 The proposed extent of development proposed introduces significant built form across a wide area, which is currently undeveloped. As a result, the proposal would result in a significant spatial and visual harm to the openness of the Green Belt.

5.3.7 The site would give rise to a high number of vehicles trips to and from the site, particularly at peak holiday times during the year such as school holidays. However, the existing site has an approved leisure use in the shape of a golf course, as well as having the potential to reopen a restaurant and café facilities and of course the main use as a hotel and conferencing facility. The vehicular trip movements from the proposed use as a holiday lodge retreat is therefore unlikely to cause any greater harm to openness than that of the existing approved use.

5.3.8 In terms of the duration of the development (with the exception of the staff statics) the lodges are considered to be buildings and are of permanent construction and durability. Each has a large expanse of decking with a hot tub and two designated parking spaces. The roadways will be of durable construction. Whilst it is noted that the applicants claim that the lodge buildings can easily be dismantled and minimal construction techniques are needed for their erection, no temporary permission is sought. Notwithstanding this, there is the very permanent nature of the existing hotel building. In light of this therefore, the duration element in comparison with the existing use, as with trip movement is not likely to have any more impact on openness than the existing use of the site as a hotel and conference facility. However, this does not overcome the spread of permanent built form across the currently undeveloped part of the site.

5.3.9 To conclude, due to the spread of the permanent buildings throughout the site, and their scale and form, it is considered there would be significant harm to openness of the Green Belt caused by the proposed development.

5.4 Does the proposal conflict with the purposes of including land within the Green Belt?

5.4.1 The Green Belt serves five purposes as defined in the NPPF Paragraph 143. They are:

- To check the unrestricted sprawl of large built-up areas,
- To prevent neighbouring towns from merging into one another,
- To assist in safeguarding the countryside from encroachment,
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

5.4.2 Regarding the first and second purpose of the Green Belt, the site is located in an open area of the countryside and would not attract additional development to locate with or beside it. The site does not form part of a large built-up area and therefore the development would not encourage sprawl or cause the merging of towns; particularly as the site is surrounded by other open fields.

5.4.3 The site is not within a historic town or adjacent to any historic assets therefore satisfying the fourth purpose.

5.4.4 The fifth purpose encourages urban regeneration and the recycling of derelict land. Whilst the land is considered to be previously developed, it is not derelict, nor is it in an urban location.

5.4.5 Regarding the third purpose, this proposal would develop the site which is in the countryside and distributing the built form throughout the site where it is currently concentrated in a small part. This causes direct conflict with the purpose of safeguarding the countryside from encroachment. This is reflected in the proposal being inappropriate development by definition (NPPF para 154(g)).

5.5 Impact on Heritage

5.5.1 Core Strategy policy EQ3 states that the Council will consider the significance of all proposed works to heritage assets, informed by relevant guidance that is supported by Historic England.

5.5.2 Section 16 of the NPPF states that when determining planning applications LPAs should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting and an appropriate assessment should be submitted in support.

5.5.3 Paragraph 205 states when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

5.5.4 Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

5.5.5 Members will have to have regard to the statutory duty set out in Planning (Listed Buildings and Conservation Areas) Act 1990 that requires that special regard be given to the desirability of preserving listed buildings and their settings.

5.5.6 Proposed development affecting a heritage asset may have no impact on its significance or may enhance its significance and therefore cause no harm to the heritage asset. Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the NPPF apply.

5.5.7 Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.

5.5.8 Whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

5.5.9 What is optimum viable use?

If there is a range of alternative economically viable uses, the optimum viable use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes.

5.5.10 For clarification purposes, the application site is contained wholly within, and is considered to be, a Grade II listed registered park and garden (RPG) and contains but is not limited to the following listed structures:

5.5.11 Boathouse approximately 400 yards south of Church of St Mary – Grade II: Listing entry 1039291
The Temple – Grade II Star: Listing entry 1374062
Boathouse approximately 25 yards north of The Temple: Listing entry 1039294

5.5.12 The listed parkland (RPG) was designed by Lancelot ‘Capability’ Brown which formed part of the pleasure grounds to the Grade I listed Patshull Hall. The site and hall were unfortunately split into separate ownership in the past and the application site was developed into a golf course. There remains a further area of RPG that extends to the north and includes a number of listed structures most notably:

- Gate, piers and wall at of Church of St Mary – Grade II: Listing entry 1039331, 1188257, 1188233
- Church of St Mary – Grade II star: listing entry 1039330
- Boathouse approximately 100 yards west of Church of St Mary – Grade II: Listing entry: 1039290

5.5.13 The listing entry of the RPG gives a good summary of the site’s history and significance, and the reader is encouraged to refer to it as a useful independent (and unusually detailed) backdrop to this report as it is too lengthy to include here. Most noteworthy sections state:

By the end of the C18 the pools on either side of the house had been extended to form a Y-shaped lake, the western branch of which is called Church Pool. The Doric temple was built, possibly by Gibbs, in the mid C18, on the west bank of the southern tip of the lake. Brick wings were added c.1840 and in 1980 it was incorporated as part of Temple hotel.

To the east of the lake is the Old Park and, beyond this, the High Park, now used as a golf course. To the west the park is divided into fields and edged with plantations.

5.5.14 As detailed in the comments from Historic England, the grounds around large country homes such as Patshull Hall were designed specifically for the enjoyment of the owners and any visitors. The landscapes would include pools, fountains and follies to excite and surprise on their walks. Both the pool and the landscape are entirely manmade and were designed in consultation with Lancelot Brown. There is an undated entry in Browns account book under ‘Lord Pigot’ for £52 10s for a ‘general plan for the Place and Journeys’.

5.5.15 The listed Temple would have been one of the follies built in the mid to late 18th Century and later extended sympathetically. Follies were an ‘eyecatcher’ and were usually unused structures that were located in landscapes to create an enhancement and to excite landowners and visitors.

5.5.16 Comments submitted by the Gardens Trust state:

The application site lies in the southern part of the park to the west of Great Pool in the area associated with the Brownian remodelling. An 18th century boathouse and small garden temple, both listed buildings, survive in this area together with a number of ancient trees possibly part of the 18th century planting scheme. The character of this part of the park was substantially altered in the latter part of the

20th century by the intrusion of a golf course, the attachment of a sprawling hotel extension to the rear of the grade II Temple, and construction of large associated car parking areas. Notwithstanding these harmful changes the underlying historic significance of the 18th century designed landscape remains intact, legible and capable of reinstatement.*

5.5.17 This is reinforced by Historic England who state;

Although used more recently as a golf course and hotel complex the application site is still clearly perceived as part of the wider parkland landscape showcasing the prominently positioned Grade II Temple folly.*

The Patshull estate is therefore a complex and sensitive series of nationally important buildings, structures and integrated landscape. As such the proposed creation of holiday lodges, a facilities building, parking, servicing etc requires the utmost deliberation.

5.5.18 None of the statutory consultees consider that the supporting evidence submitted provides sufficient justification or understanding of the either the settings of the listed buildings nor the impact on the RPG. These comments were relayed to the agent who amended the layout of the lodge buildings to the layout considered here and provided a rebuttal on the consultee comments.

5.5.19 The lodge buildings would result in an intensive spread of development within the listed RPG and would also result in harm to the setting of some listed structures. The application considers that the development is contained to just a small part of the RPG however it is considered that the RPG cannot be split and compartmentalised in such a way. It is contended that what is left of the registered parkland should be preserved and a number of consultees have commented that they would prefer to see the site rewild as it has already started to do which in some way has regained some of the Brownian design principles which would cause significantly less harm to the designated Heritage Asset. The number of lodge buildings has been reduced from the original submission (100) and moved further away from the listed folly, but changed from temporary lodges that would satisfy the definition of a caravan, to permanent buildings with heights ranging from 5 to 6.5m. They are to be located wholly within the registered parkland and within close proximity of the listed church, boathouse and most crucially within the Grade I Hall. Having walked the park on a number of occasions and stood on the northern part of the park, close to the bridge but south of the hall, the lodge buildings would be clearly viewed across The Great Pool. The RPG and all of the associated listed structures are inextricably linked and cannot be separated from the Grade I listed Hall. Any development close to or within the RPG would have a detrimental impact on the significance of the Hall. The Hall is listed as Grade I and its setting should be afforded significant weight, as should the comments from the statutory consultees.

5.5.20 The Council's Conservation Officer considers there to be both harm to the listed RPG as well as the setting of a number of listed structures on site. He contends that whilst overall the impact on the whole of the registered park would be "less than substantial", the scheme would cause substantial harm to this key element of the parkland landscape. The proposed addition of more planting and trees in the area around the lodges also has a detrimental impact upon what is a man-made landscape. Whilst it has previously been accepted that the golf course has eroded the character of this part of the park, it has retained an openness that is closer to the original state of the landscaping. The character of the area can be more easily be returned to be closer to a Brownian landscape from its current state than when a large number of lodges have been constructed and additional planting etc. carried out. The fact that the golf course has previously eroded the character of this part of the landscape is not a clear justification for causing further harm.

5.5.21 The Gardens Trust and Staffordshire Gardens and Parks Trust and The Capability Brown Society both object to the proposals and consider that substantial harm is caused. This harm relates to the impact of the lodges and associated buildings and infrastructure on the various heritage assets and their setting, the historic access road to Patshull Hall and St Mary's Church and appreciation of the Capability Brown setting, particularly to all those entering the site.

5.5.22 Historic England state that, 'the current proposals would harm the significance of the Patshull Historic Park and Garden and as such the setting of Patshull Hall, the significance of the listed Temple and its setting, and the approach and context of the listed Church of St Mary. No clear and convincing justification has been provided within the application and, in our view, there are limited heritage benefits to offset the harm identified. As required by the NPPF, it is necessary to weigh any harm identified against the public benefits of the proposals. Clearly this is the role of your authority. However, we would emphasis that this should be a very high bar'.

5.5.23 The NPPF does allow for development to be approved if there are public benefits that outweigh the less than substantial harm. It is the decision maker who is to balance and consider the matter of public benefit as is the case with very special circumstances and this is discussed in the next section of this report.

5.6 Case for very special circumstances and justification for harm to Heritage (public benefit) and optimum viable use

5.6.1 When considering planning applications, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

5.6.2 Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework ([paragraph 8](#)). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.

5.6.3 Examples of heritage benefits may include:

- sustaining or enhancing the significance of a heritage asset and the contribution of its setting
- reducing or removing risks to a heritage asset
- securing the optimum viable use of a heritage asset in support of its long term conservation

5.6.4 The case for very special circumstances/public benefits can be summarised as follows:

- Protection and enhancement of Heritage
- Sustainable economic benefits
- Public benefits
- Visual containment, landscape enhancement and biodiversity

Protection and enhancement of Heritage

5.6.5 The case for the protection and enhancement of the existing heritage is welcomed by the Council. The site has a number of listed buildings on it, most likely to benefit here is the Grade II star listed

temple and the listed boathouse. However, no case has been presented that concludes the existing structures are falling into a state of disrepair and urgently need funds to allow for their maintenance and repair. The applicants also detail that access would be granted to the registered parkland when there has previously been none, other than those playing golf, and that the costs of the maintenance of the trees would thus increase.

5.6.6 Whilst the Council would welcome the restoration of the listed Temple, this would be facilitated through the introduction of 59 lodge buildings, a facilities building and associated infrastructure. As highlighted by statutory consultees this would significantly change how the historic parkland is appreciated and cause harm to the various listed buildings and RPG. As a result, only limited if any weight is attributed this consideration.

Public Benefits - Installation of footpath and access to parkland

5.6.7 An existing permissive footpath (the 'Millenium Way') that leads from the village of Pattingham to the registered parkland (not within the redline boundary) would be made a definitive public right of way by the landowners. A plan submitted with the application shows the creation of a further definitive public right of way which would be located in the Northern half of the golf course, closer to Patshull Hall as well as a further right of way linking this path to the existing permissive Millenium Way. It is also important to note that there are two public rights of way that already exist throughout the RPG; Pattingham and Patshull 26 which leads to the church from an access track north of the application site as well as Pattingham and Patshull 25 which runs through the site to the east of the Great Pool from Patshull Road to the south. It is contended that access could be granted to the park immediately without significant costs to the applicants if the intention is to allow public access for the good of the community, indeed, works to improve accessibility to the footpaths have already been undertaken without the benefit of the planning permission sought here; confirming the relatively minimal costs involved.

5.6.8 In addition, the Council's arboricultural officer comments that the erection of lodge buildings would in fact, increase the need for maintenance of the existing trees for safety purposes where there is currently none. Due to the existence of two public rights of way across the parkland already, as well as the existence of a permissive right of way linking the village to the RPG, only limited weight is attributed to the consideration.

5.6.9 Creating statutory public rights of access can only be done through a public path creation order under the Highways Act as set out below and in consultation with Staffordshire County Council. Works have already begun which shows the applicants willingness to ensure they are provided.

Economic Benefit

5.6.13 The Council would welcome the regeneration of the site and recognises that there would be economic benefits from the scheme that would include the spend from users as well as job creation. The application has been amended to provide 100% holiday rentals which will create an anticipated 36 full time equivalent jobs (which may increase by 47) and £2.5 million spend in the local economy per year whilst the construction phase would create up to 45 full time jobs. A letter of support submitted by the Staffordshire Tourism Board. The applicants have a well-respected and recognised end user in mind if planning permission is granted. It is certainly welcomed that such a provider would be facilitating a tourism destination within the district, but this is not an appropriate site for them for the reasons set out in this report, nor is there a mechanism for this end user to be secured either now or in perpetuity. Any permission would be for the erection of the lodge buildings alone and would not be a personal permission to the business.

5.6.14 Overall, the economic benefits are afforded moderate weight in the planning balance.

Biodiversity Enhancement

5.6.15 Part of the very special circumstances case also rests on the landscape and biodiversity enhancement. Objections have been submitted by both the Senior Ecologist and the Council's Senior Arboricultural officer who have serious concerns over the detrimental impact the development would have on the ongoing health of a number of trees on site, many of which are veteran. It is agreed that the site is laid out as formal golf course, however many of the bunkers and greens have started to rewild and there has already been advantages to the both the landscape and biodiversity from this. It is recognised that the site could be reverted back to a 'working' golf course and hotel but visitors to the venue would either be concentrated at the hotel for the facilities there, or visitors would play golf where users simply hit a ball and follow it around the site. There would not be concentrated numbers of people and development within the locations of the existing trees, and certainly none would need to be removed as is proposed with this scheme.

5.6.16 Notwithstanding that the areas below the veteran trees are proposed to be planted, this would not prevent young children from playing within these areas and pressures would inevitably come to the Council requesting permission to prune to keep the trees 'safe'. In light of these objections and in spite of the fact that there would be some biodiversity gain at the site, there are objections submitted and only limited weight can be applied to this element of the applicants very special circumstances case.

Optimum Viable Use

5.6.17 Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, the [National Planning Policy Framework \(paragraph 207\)](#) requires that this harm should be weighed against the public benefits of the proposal including, where appropriate, securing the optimum viable use of that asset.

5.6.18 Where a heritage asset is capable of having a use, then securing its optimum viable use should be taken into account in assessing the public benefits of a proposed development.

5.6.19 'Area-based' designated heritage assets such as World Heritage Sites and conservation areas will not themselves have a single use (though any individual heritage assets within them may). Therefore, securing the optimum viable use of the area-based asset as a whole is not a relevant consideration in assessing the public benefits of development proposals affecting such heritage assets. However, securing the optimum viable use of any individual heritage assets within the area-based designated heritage asset may still be a relevant consideration.

5.6.20 Appropriate marketing is required to demonstrate that a heritage asset has no viable use in the circumstances set out in [paragraph 207 of the National Planning Policy Framework](#). The aim of such marketing is to reach potential buyers who may be willing to find a viable use for the site that still provides for its conservation to some degree. If such a purchaser comes forward, there is no obligation to sell to them, but it will not have been demonstrated that the heritage asset has no viable use.

5.6.21 A confidential business case was submitted in support of the application in an attempt to demonstrate that the site is unviable in its current form (hotel and golf course). As a point of clarity this document was confidential due to commercially sensitive information being contained. As such it is not conducive with paragraph 58 of the NPPF which relates to specifically viability assessment. The case states that the rebuilding of the hotel may not be viable due to the costs involved with demolition, but

this is somewhat confusing given the hotel is proposed to be demolished here and a significant amount of money would be spent providing the services and associated works needed for the erection of the lodge buildings (circa £20 million). There is no evidence giving likely build costs to either refurbish/enhance the hotel or to replace it for it to be considered as truly unviable to re-instate this use. A letter was submitted by Knight Frank that detailed how and when the site was marketed and why the hotel and golf/spa business model is failing in the current economic climate. This was an exercise that was undertaken at an unusual time in the market, given the ongoing effects of lockdown and Covid as well as the effect of Brexit. The letter details that an offer was made on the hotel but this was withdrawn due to potential issues including poor water supply to the hotel as well as boundary issues. It is noted that a purchase was made in spite of these issues. The letter goes on to explain that the amount of money needed to spend on the hotel could not be recouped at the local room rates. However, there is no mention of revenue from weddings or other events. It is stated that staff being able to access the hotel would be an issue, this is somewhat confusing as the use as a holiday lodge building would also need staff to be able to access the site. The letter ends by stating that alternative uses should be considered for Patshull Park as the viability of the site for the continued hotel use is extremely low. It does not conclude that the only viable use would be holiday lodge buildings.

5.6.22 If there is a range of alternative economically viable uses, the optimum viable use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes. Nothing has been presented to denote that other ideas were considered or explored, say for example, other pieces of land not within the RPG were looked at from a sequential approach, for locating the lodge buildings. It is indeed in fact considered that the RPG is the *preferred* location by the applicant, as it would create a 'pretty' location for a tourism destination. No viability case has been submitted. As the decision maker, it is not considered that sufficient evidence has been provided that the use proposed is in fact the optimum viable use.

5.7 VSC and public benefit conclusions

5.7.1 It is important here to point out that if one were to consider the case as a set of scales, the harm to the Green Belt and the harm to the designated heritage assets (albeit less than substantial) weigh down on one side. The benefits as detailed above, would need to clearly tip the scales in the favour of the development. In this instance, given the elements of harm, this is a high bar to overcome. The reader will be aware that national policy requires any harm to the Green Belt to be given substantial weight, as well as this, as decision makers, we also have the weight attributed to the harm to the designated assets, and the plural here is given emphasis. The harm to Heritage has been outlined by a number of expert consultees.

5.7.2 Whilst it is recognised that it would be of some benefit to the community to have access across the entire RPG, this should not be at the detriment to part of it. There are also two existing PROWs across the RPG and the existence of a permissive path leading from Pattingham Village to PROW number 24. It is noted that there would be welcomed economic tourist benefits in accordance with Core Strategy policy EV2, again, it is not considered that these benefits are so great to overcome both elements of harm. As with the case for very special circumstances, it is not considered that public benefits would outweigh the harm to heritage assets, albeit less than substantial, and these have been discussed in detail above. Insufficient evidence has been presented that demonstrates the proposed used is the optimum viable use.

5.8 Impact on Highways

5.8.1 Section 9 of the NPPF requires LPAs to consider and promote sustainable forms of transport, whilst addressing community needs and creating places that are safe, secure and attractive; which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards. Core Strategy policy CP11 and EV11 echo these themes.

5.8.2 The application has been considered by both the County Highways Team and the Highways Team at the neighbouring authority of Shropshire Council, neither of which has objected. County Highways have requested a monetary sum to allow for the monitoring of the Travel Plan.

5.8.3 In light of the above, it is considered that the proposal is in accordance with the aims of the NPPF and the relevant policies in the Core Strategy.

5.9 Impact on Ecology and veteran trees

5.9.1 Core Policy 2 of the Core Strategy states the Council will support development or other initiatives where they protect, conserve and enhance the district's natural and heritage assets. Policy EQ1 provides that developments should not cause significant harm to habitats of nature conservation, including woodlands and hedgerows, together with species that are protected or under threat. Support will be given to proposals which enhance and increase the number of sites and habitats of nature conservation value, and to meeting the objectives of the Staffordshire Biodiversity Action Plan. These principles are echoed and supported through the Sustainable Developments SPD 2018. Section 15 of the NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans;
- and
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

As well as this, it also requires that when determining planning applications, LPAs should ensure that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists. Wholly exceptional circumstances include infrastructure projects where the public benefit would clearly outweigh the loss of determination of habitat. There are no such circumstances here.

5.9.2 Overall the Senior Ecologist has no objections to the mitigation proposal suggested by the applicants to satisfy the 'net gain' requirements of national planning policy. Despite the additional work carried out by the applicants in response to objections submitted there remains an objection from both the Senior Ecologist and the Senior Arboricultural Officer in relation to the impact on the existing trees on site. As detailed in the very special circumstances section of this report a high number of the visitors to the existing hotel and golf course use would either be concentrated at the hotel for the facilities there, or visitors would play golf and wander through the site in small numbers throughout dispersed times of the day. There would not be concentrated numbers of people and development within the locations of the existing trees as would undoubtedly happen if the lodge buildings were to be approved.

5.9.3 Notwithstanding that the areas below the veteran trees are proposed to be planted, this would not prevent children and adults alike from playing or walking within these areas and as such pressures would inevitably come to the Council requesting permission to prune to keep the trees 'safe' as well as potentially causing compaction issues. In spite of the additional information provided by the applicants, there remains concerns from the Senior Arboricultural Officer and Senior Ecologist that the underground service runs would cause harm to the tree roots. The proposed loss of trees is predominantly those that were planted when the golf course was created or were self-seeded and have been considered acceptable as their loss would be mitigated by replacement planting. It is noted the Woodland Trust have withdrawn their objection.

5.9.4 The supporting report states that mitigation measures for great crested newts will be carried out under a European Protected Species Licence and the applicant have provided further information, including a mitigation method statement for the site, which must prove to the Council that the applicant is likely to be granted an EPSL by Natural England if they are granted planning permission. Overall, the Senior Ecologist is satisfied with the submitted information that a licence would be granted. This information has been submitted and appraised since the last planning committee meeting in April 2023, as such this previous reason for refusal has been removed as it has been addressed.

5.9.5 In light of these objections and in spite of the fact that there would be some biodiversity gain at the site, there remains an objection that has not been overcome during the course of the application, and planning conditions would not overcome this objection. The proposal is contrary to national and local policy that seeks to protect and enhance natural assets.

5.10 Drainage

5.10.1 Core Policy 3 of the Core Strategy states the Council will require development to be designed to cater for the effects of climate change, making prudent use of natural resources, enabling opportunities for renewable energy and energy efficiency and helping to minimise any environmental impacts by:

- guiding development away from known areas of flood risk as identified in the Strategic Flood risk assessment, surface water management plan and consistent with the NPPF,
- ensuring the use of sustainable drainage (SUDS) in all new development and promoting the retrofitting of SUDS where possible,
- ensuring that all development includes pollution prevention measures where appropriate, to prevent risk of pollution to controlled waters.

5.10.2 EQ7 requires new development to include SUDS, which is further echoed in the Sustainable Development SPD 2018.

5.10.3 Paragraph 173 of the NPPF states:

When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
- b) the development is appropriately flood resistant and resilient;
- c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
- d) any residual risk can be safely managed; and
- e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

5.10.4 A number of technical queries were raised initially by the Lead Local Flood Authority (LLFA) regarding the measurements used within the flood risk assessment submitted, and a holding objection was received pending resolution of the matters raised. These were addressed accordingly by the applicants culminating in the revised Flood Risk Assessment and Drainage Strategy received 26th January 2024. The LLFA have now reviewed the revised document and have withdrawn their objection subject to a pre-commencement condition requiring a fully detailed surface water drainage scheme for the site. This is to prevent flooding by ensuring the satisfactory storage of and disposal of surface water from the site.

5.10.5 In light of the above, it is considered that the proposal is in accordance with policies CP3 and EQ7 of the Core Strategy.

5.11 Impact on neighbours

5.11.1 In accordance with Core Strategy Policy EQ9, all development proposals should take into account the amenity of any nearby residents, particularly with regard to privacy, security, noise and disturbance, pollution, odours and daylight.

5.11.2 I have taken into account the comments received from residents and addressed the points within the relevant sections of this report. Overall, there is no concern with regard to neighbour amenity. The two properties at the site entrance would most likely be affected by the number of cars entering and exiting the site. However, the hotel and golf use could be re-instated quickly, and as detailed earlier in the report, the trip generation is not likely to materially increase, despite there being peak arrival and departures times. As a result, there would be no materially greater harm to the amenity of neighbours from the proposals than the existing use, which could resume.

6.1 CONCLUSIONS

6.1.1 The proposed development is inappropriate development in the Green Belt. Inappropriate development is, by definition, harmful to the openness of the Green Belt. The proposal would also create a significant level of visual and spatial harm to the openness of the Green Belt and also causes direct conflict with the purpose of safeguarding the countryside from encroachment. This harm shall be attributed substantial weight in the planning balance. In addition to the Green Belt harm there is harm to a number of designated Heritage Assets, and this is 'less than substantial harm' is not outweighed by the public benefits arising from the proposal. In addition, the proposal is likely to lead to the long-term degradation of a high value tree stock.

6.1.2 The applicant has advanced a number of considerations by way of very special circumstances. Full consideration has been given to the case presented by the applicants, that there are public and economic benefits, some ecological benefits as well as benefits to the Heritage on site. It is recognised that there would be some economic benefit from the proposal, however this can only be afforded moderate weight in the planning balance and the benefits to the tourism of South Staffordshire would be minor, arising from 59 holiday lodge buildings. Any ecological benefit is counteracted by concerns that the proposal would have a seriously detrimental effect on the health of a number of trees on site, some of which are veteran as the use is incompatible and would result in pressure to prune and potentially remove such trees on 'safety grounds'.

6.1.3 For the reasons above, it is not considered that these matters clearly outweigh the substantial weight that must be attached to the Green Belt harm and other harm as identified in this report.

6.1.4 The decision maker should attach considerable weight to representations made by statutory consultees and the statutory duty set out in Planning (Listed Buildings and Conservation Areas) Act 1990 that requires that special regard be given to the desirability of preserving listed buildings and their settings.

6.1.5 Taking the above into consideration I am recommending the application be refused.

7. RECOMMENDATION - REFUSE

Reasons

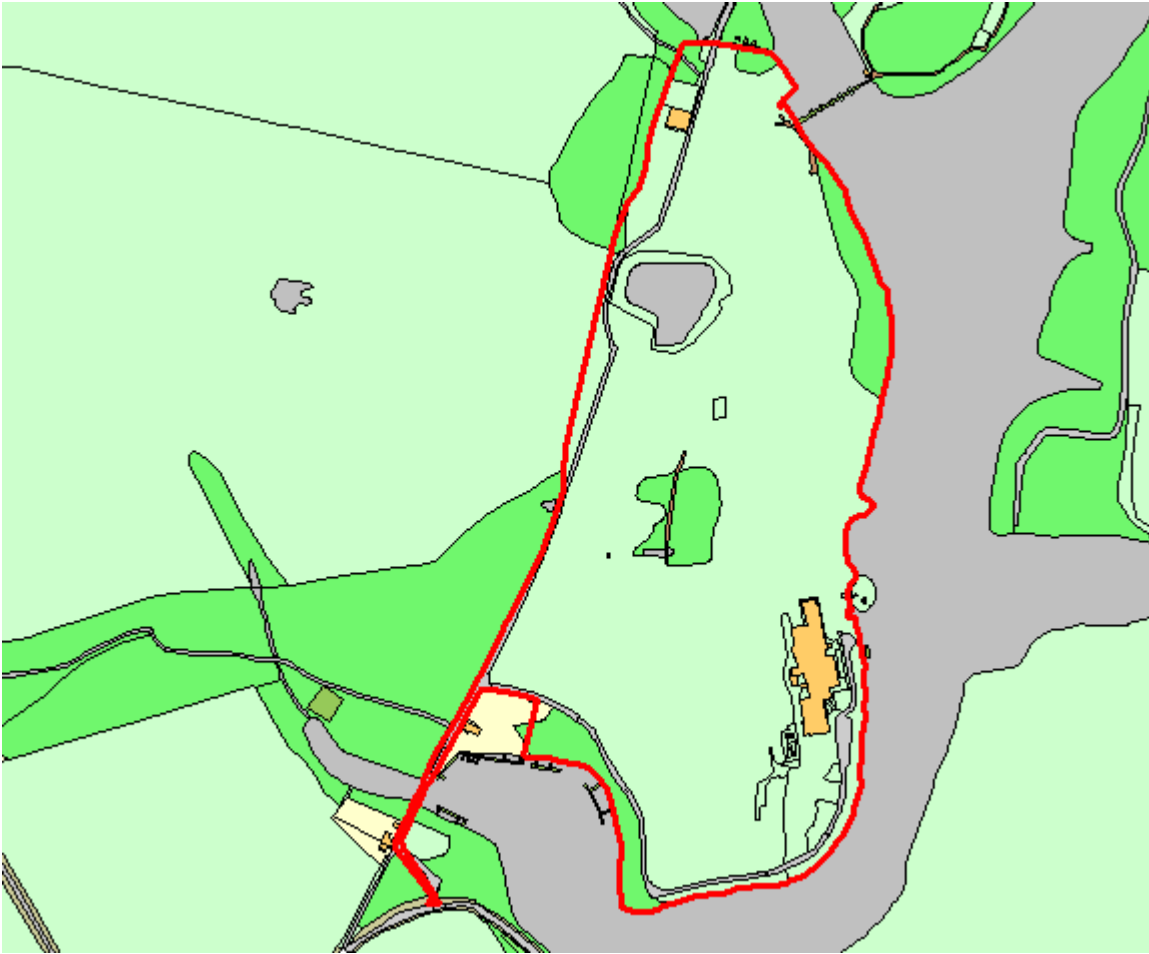
1. The site is within the Green Belt and the proposed development is considered to be inappropriate development as set out in policy GB1 of the adopted Core Strategy. The development is therefore harmful to the Green Belt, contrary to policy GB1 of the adopted Core Strategy.
2. The Local Planning Authority has considered the reasons advanced but does not consider that these reasons constitute the very special circumstances required to clearly outweigh the harm to the Green Belt by reason of inappropriateness, visual and spatial harm, conflict with the purposes of the Green Belt and other harm resulting from the proposal, contrary to the NPPF.
3. The proposal would cause harm to a number of designated Heritage Assets including the character of the Grade II listed Park and Garden as well as the setting of the Grade I listed Hall, Grade II* listed Temple and Grade II boathouse. The public benefits would not outweigh the harm, contrary to Local Plan policy EQ3 and Part 16 of the NPPF. Insufficient evidence has been presented that demonstrates the proposed use is the optimum viable use and that the development is necessary to secure the economic viability of the site.
4. The Veteran trees on site, of which there are a significant number will need to effectively be isolated from casual access by residents. Retaining Veteran trees in high usage areas carries an inherent risk that needs to be managed. Simply providing extra space around them is not sufficient and it is unclear as to whether this has been given ample consideration; even if adequate provisions were made however, there is then the question of whether this in turn would have further impact on the character of the Brownian landscape. Such a high intensity development of the site would lead to the long-term degradation of a high value tree stock contrary to Core Strategy policy EQ4 and Part 15 of the NPPF. No wholly exceptional reasons or a suitable compensation strategy exists to outweigh this harm.

Proactive Statement -The Local Planning Authority has worked in a positive and proactive manner in accord with National Planning Policy Framework 2023, paragraph 38, by attempting to seek solutions with the applicant to problems associated with the application. A solution could not be found and so the development fails both with regards to the NPPF and the adopted South Staffordshire Core Strategy 2012.

Plans on which this Assessment is based:

Plan Type	Reference	Version	Received
Location Plan	4556-S0 REV P1-PAT-HMA-CF-XX-DR-A-00000		27 January 2022
Existing Site Plan	4556-S0-REV P1-PAT-HMA-LT-00-DR-A-00001		27 January 2022
Proposed Masterplan C	PAT 01PMPC	REV D	7 November 2023
Existing Ground Floor Plan (hotel)	4556-S0-REV P1-PAT-HMA-LT-00-DR-A-00002		27 January 2022
Existing First Floor Plan (hotel)	4556-S0-REV P1-PAT-HMA-LT-01-DR-A-00003		27 January 2022
Existing North and South Elevations (hotel)	4556-S0-REV P1-PAT-HMA-LT-XX-DR-A-00005		27 January 2022
Existing Roof Plan (Hotel)	4556-S0-REV P1-PAT-HMA-ZZ-02-DR-A-00004		27 January 2022
Existing Western Elevations (Hotel)	4556-S0 REV P1-PAT-HMA-LT-XX-DR-A-00007		27 January 2022
Existing East Elevation (Hotel)	4556-S0-REV P1-PAT-HMA-LT-XX-DR-A-00006		27 January 2022
Existing Ground Floor Plan (Hotel)	4556-S0-REV P1-PAT-HMA-CF-00-DR-A-00002		27 January 2022
GF Demolition Plan	4556-S0 REV P1-PAT-HMA-A-03002		27 January 2022
1 st Floor Demolition Plan	4556-S0-REV P1-PAT-HMA-A-03003		27 January 2022
RF Demolition Plan	4556-S0-REV P1-PAT-HMA-A-03004		27 January 2022
North and South Elevations Demolition Plan	4556-S0-REV P1-PAT-HMA-A-03005		27 January 2022
West Elevations Demolition Plan	4556-S0-REV P1-PAT-HMA-A-03006		27 January 2022
West Elevations Demolition Plan	4556-S0-REV P1-PAT-HMA-A-03007		27 January 2022
Existing Ground Floor Plan (Hotel)	4556-S0-REV P1-PAT-HMA-CF-00-DR-A-00002		27 January 2022
Proposed Elevations (Central Building)	PL(00)201	Rev C	19 October 2022
Proposed Ground Floor Plan (Central Building)	PL(00)200	Rev C	19 October 2022
Proposed Plans and Elevations	220712_FH CABIN 1BED		7 November 2023

Proposed Plans and Elevations	2BED DDA_PL120M REV.C_230630	REV C	7 November 2023
Proposed Plans and Elevations	220712_FH CABIN 2BED		7 November 2023
Proposed Plans and Elevations	220712_FH CABIN 3BED		7 November 2023
Proposed Plans and Elevations	220712_FH CABIN 4BED		7 November 2023
Proposed Plans and Elevations	3 BED TWIN CHASSIS ACCOMODATION	REV 1	7 November 2023
Proposed Plans and Elevations (Tree House)	PL(00)0095	REV B	7 November 2023
Proposed Tree Removal Plan	1410/10 REV A		27 January 2022
Tree Protection Plan	406.V11343.00001.ARB.D.002- 04		7 November 2023
Tree Protection Plan	406.V11343.00001.ARB.D.003- 04		7 November 2023
Tree Protection Plan	406.V11343.00001.ARB.D.004- 04		7 November 2023
Tree Protection Plan	406.V11343.00001.ARB.D.005- 04		7 November 2023



Patshull Park Hotel Golf and Country Club, Patshull Park, Burnhill Green WV6 7HR