

**NORTH SOMERSET COUNCIL  
DELEGATED PLANNING APPLICATION  
REPORT SHEET****Target Date:** 15 September 2017**Extended date:** 25 October 2017**Application No.** 17/P/1502/F**Application Type:** Full Planning Permission**Proposal:** Proposed change of use of land from camp site to the siting of 40no. static and touring caravans**Location:** Land at Purn Holiday Village, Bridgwater Road, Bleadon, BS24 0AN**Site History**

The application site and the land to its east comprise large open fields. The application site is, according to the application forms, used as a camping site. There is however no evidence in terms of information from previous planning applications or aerial photographs for example to show that the land has permission to be used as a camping site. During my site visit there were 5 or 6 portable timber camping pods and tents in the northern edge of the application site. The lawful planning use of the site is considered to be agricultural.

In the south-west corner of the adjoining field to the east is a large pond. According to the applicant, this area comprised a pond for many years and was formerly surrounded by vegetation including trees. The applicant said that flooding of the pond caused by high 'penned' water levels on the adjoining River Axe, resulted in marsh-like ground conditions, which caused the trees to deteriorate. The applicant removed the trees and renovated the pond. This work was subject to investigation from planning enforcement, but it was deemed not to require planning permission.

<b>Reference</b>	<b>Proposal</b>	<b>Decision</b>
16/P/2625/F	Extension to clubhouse to form take-away and toilet block	Approved
15/P/1961/F	Extension to clubhouse and swimming pool	Approved

Planning permission reference number 15/P/2304/F was granted in 2016 for a holiday lodge / caravan site on a field which adjoins the site (to the west of it). This allows no more than 57 units on that field. This has not been implemented to date, but the applicant confirmed during my site visit that he has acquired the land.

**Policy Framework**

The site is in the countryside and it adjoins a wildlife site.

**The Development Plan****North Somerset Core Strategy (NSCS) (adopted January 2017)**

The following policies are particularly relevant to this proposal:

<b>Policy Ref</b>	<b>Policy heading</b>
CS1	Addressing climate change and carbon reduction
CS2	Delivering sustainable design and construction
CS3	Environmental impacts and flood risk management
CS4	Nature Conservation
CS5	Landscape and the historic environment
CS7	Planning for waste
CS10	Transport and movement
CS11	Parking
CS12	Achieving high quality design and place making
CS20	Supporting a successful economy
CS22	Tourism Strategy

### The Sites and Policies Plan Part 1: Development Management Policies (adopted July 2016)

The following policies are particularly relevant to this proposal:

<b>Policy</b>	<b>Policy heading</b>
DM1	Flooding and drainage
DM2	Renewable and low carbon energy
DM6	Archaeology
DM7	Non-designated heritage assets
DM8	Nature Conservation
DM9	Trees
DM10	Landscape
DM11	Mendip Hills Area of Outstanding Natural Beauty
DM13	Duration of planning consent for disposal of waste to land
DM24	Safety, traffic and provision of infrastructure etc. associated with development
DM25	Public rights of way, pedestrian and cycle access
DM27	Bus accessibility criteria
DM28	Parking standards
DM32	High quality design and place making
DM58	Camping and caravan sites

### Sites and Policies Plan Part 2: Site Allocations Plan (emerging plan)

The Site Allocations Plan was submitted to the Planning Inspectorate for examination on 24 February 2017. Hearings were held on 16–18 May 2017. Following the close of the hearings the Inspector produced a letter on 26 June 2017 which identifies the further work she considers needs to be undertaken in relation to housing supply in order to make the plan sound. In response to this letter the council has reassessed a number of potential housing sites for inclusion in the Site Allocations Plan. In total, 22 new housing sites were approved for inclusion in the Site Allocations Plan by the Executive Committee at its meeting on 5 September 2017. Details of these sites and other proposed modifications have been forwarded to the Inspector.

## **Other material policy guidance**

### **National Planning Policy Framework (NPPF) (March 2012)**

The following is particularly relevant to this proposal:

#### **Section No Section heading**

1	Building a strong, competitive economy
3	Supporting a prosperous rural economy
4	Promoting sustainable transport
7	Requiring good design
10	Meeting the challenge of climate change, flooding and coastal change
11	Conserving and enhancing the natural environment
12	Conserving and enhancing the historic environment

### **Supplementary Planning Documents (SPD) and Development Plan Documents (DPD)**

- North Somerset Parking Standards SPD (adopted November 2013)
- North Somerset Landscape Character Assessment SPD (adopted December 2005)
- Biodiversity and Trees SPD (adopted December 2005)
- Solar Photovoltaic (PV) Arrays SPD (adopted November 2013)

## **Consultation Summary**

Copies of representations received can be viewed on the council's website. This report contains summaries only.

### **Bleadon Parish Council**

No objections but the developer should contribute to the general improvement of traffic issues likely to be caused by the development, particularly at the junction of the A370.

**Natural England:** Increased visitors could result in increased use of Purn Hill which is a SSSI. The site boundaries and River Axe could be used by Bats. Their retention is therefore important. Any increase in light is also sensitive. The site is relative close to the boundary of the Mendip Hills AONB and the application should be considered in the context of paragraph 115 of the NPPF.

**Woodspring Ramblers Association:** Should a footpath diversion order be required this must be resolved before development can commence.

**Environment Agency:** No objection subject to condition and advice noted.

**Axe Brue Internal Drainage Board:** No objection, subject to advice Nore:

**Bristol Water:** No objections

## **Neighbour's Views**

Four representations have been received to date: one is unqualified support and three objects on the grounds that the site is becoming too large, a large majority of the static caravans are occupied all year round, and the village amenities are not capable of supporting this. Another point is that the site is a haven for wildlife especially alongside the rhynes and River Axe and the scale of development would have a damaging impact on wildlife in the area.

## **Procedural Issues**

According to the Environmental Impact Assessment Regulations 2017, the proposal falls under Part 2 Section 12 'Tourism and Leisure' sub-section (e) Permanent camp sites and Caravan Sites. For such proposals EIA screening is only required where the area of development exceeds 1 hectare. The application site is below 1 hectare and there are no other issues which would give rise for this proposal to be screened under the EIA Regulations.

## **Conclusions**

### The principle of development

The land is Grade '3B' (Moderate Quality) agricultural land and there are no in-principle objections to it being changed to a caravan site.

The Council's tourism strategy is set out in Policy CS22 of its Core Strategy. This says: *"New, improved and replacement visitor and tourist facilities and accommodation will be supported across the district provided they:*

- 1) are of an appropriate scale and improve the quality and diversity of the tourist offer;*
- 2) maximise, where possible, any opportunities for access by means other than the car;*
- 3) support conservation and economic development objectives;*
- 4) have no adverse implications for the environment, local amenity and character of the area."*

Policy DM58 applies to 'Caravan and Camping Sites'. This supports new or extended touring and static caravan sites outside the Green Belt and AONB provided (of relevance):

- the proposal respects the scale, form, materials and design of any existing buildings and does not harm the character of the surrounding area;
- there is safe and convenient access to the highway network and there are no significant adverse effect on the local highway network;
- it would not have a significant adverse impact on the living conditions of adjoining occupiers;
- proposals are sited so as to minimise their visual and landscape impact - extensions to existing sites that are considered intrusive must include environmental improvements to the existing site;
- proposals which are granted planning permission will be conditioned to ensure they are used solely for holiday use.

## **Flood Risk and Drainage**

According to the Council's Flood Zone mapping and the Environment Agency's records, the site is within a 3a (High Probability) tidal flood zone.

The national planning practice guidance (PPG) defines sites used for holiday or short-let caravans and camping as a 'More Vulnerable Use'. It says such uses should only be supported in flood zone 3a if sequential and exceptions tests are passed. This is elaborated in Paragraph 101 of the NPPF which says: "*The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding*". Paragraph 102 of the NPPF says: "*If, following application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding, the Exception Test can be applied if appropriate. For the Exception Test to be passed:*

- *it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared*
- *a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall*

The applicant's sequential test does not consider the availability of other sites. Instead it contends that the benefit of the proposal lies in its accessibility to the M5 Motorway and its immediacy to 'A' roads. It also says that the general location of the site is well-placed in relation to nearby established tourist attractions at Weston-super-Mare; Burnham-on-Sea and Brean, such that there is a tourism synergy between the site and its near surroundings. They say that to take-on a wider search area further afield from these locations would lose these benefits. Moreover they rely on the proposal being an extension to an established and well-serviced holiday park as the main point for its location.

The national planning policy guidance (PPG) provides information on sequential test. It says when considering planning applications for extensions to existing business, such as this, it might be impractical to suggest that there are more suitable alternative locations for that development elsewhere. Given this advice, it is disproportionate to expect the applicant to search wider land availability. The sequential test is therefore deemed to be passed.

For the first part of the exceptions test, the sustainability impacts are mixed. On the one hand the loss of the field and the visual impact of the proposal causes some harm although this is minor to moderate (see 'Landscape and Visual Impact for more information). However local investment, with the prospect of 9 additional full-time jobs is in the wider public interest and this carries greater weight.

With regard to flood risk, the applicant's Flood Risk Assessment provides details of their proposed drainage strategy. This demonstrates that there will be no increase in surface water flood risk in the area. This is because surface water will go to a balancing pond in the applicant's control and this has adequate capacity to cater for additional discharge.

Sustainable drainage is also provided in the form of permeable surfaces on roads and paths and loose stone and gravel parking around the pitches and the visitor's car parking.

There are no objections to the proposal in terms of flood risk, provided the details of the applicants Flood Risk Assessment are implemented.

### **Landscape and Visual Impact**

Policy CS22 of the Core Strategy and DM58 of the Sites and Policies Plan both say development should not have an adverse impact on the character or appearance of the landscape. Policy CS5 of the Core Strategy requires development proposals to protect and enhance the character, distinctiveness, diversity and quality of the landscape. This is translated into practical guidelines for the management of development by Policies DM10 of the Sites and Policies Plan. The "policy aim" of DM10 is the same as CS5.

The site falls within the 'A5 Bleadon Moor' landscape character area (North Somerset Landscape Character Assessment - 2005), which is a small part of the much larger Somerset Levels. Bleadon Moor is a flat low lying rural landscape with large scale fields, some bounded by tall hedges, with more open fields closer to the sea. It is described as having a strong character although, in some places particularly at the west of the area, this has weakened due to the large scale change in land use to arable farming plus the influence of urban fringe activities, which includes a sewage treatment works, caravan sites, a model car racing circuit and pylons.

The condition of the Bleadon Moor landscape is described as *variable* with its overall condition being in decline. The *strategy* for Bleadon Moor is to conserve the rural pastoral landscape through:

- The conservation of the remote rural, pastoral character;
- Encourage restoration of pasture in areas now under intensive arable;
- Encourage less intensive farming methods to enhance the biodiversity interest of ditches and rhynes;
- Enhance the historic hedgerow network where this has become weakened through replanting using a range of species and cyclical cutting.
- Maintain grassland containing archaeological sites.

To the north and east is the 'E1 Mendip Ridge' landscape character area: an elevated area of land forming part of the Mendip Hills. The Mendip Hills AONB boundary commences approximately 950m to the north-east of the site, north of the village of Bleadon.

The application site slopes gently from its north to southern boundaries, with a more pronounced slope down towards the northern bank of the River Axe. While much of the land to the south of the site and River Axe is open agricultural land, the character and appearance of the land immediately to the north and north-west is more diverse and built-up. This includes the existing caravan site to the north and business units at Purn Farm to the north-west. The field to the west of the site has permission for up to 57 caravans and it was formerly used for Car Boot sales twice a week. The land to the south-west of the application site also has planning permission to be used for the construction of two large lakes for water sports. Earth works commenced for this development but these appear to have ceased and the lakes are not yet constructed. The sum of these developments creates a cluster of non-agricultural uses, which has a localised effect on the appearance

and character of the Bleadon Moor landscape, although it is relatively modest and well-contained in the wider moors landscape.

The location of the application site is unlikely to be seen to any great extent from the nearest surrounding roads, such as Accommodation Road or Bridgwater Road (which are at the same broad ground levels), but a public right of way (PROW) passes through the field. The route of this PROW is not apparent on the ground, but several people (dog walkers) were observed to cross the site during my site inspection and another person was fishing at the River Axe. These did not appear to be guests of the holiday park, which suggests the field is popular for local recreation, which is unsurprising since the site provides an attractive setting near to the river.

The site can be seen from some sections of the public footpath running north-south on Purn Hill and from a permissive path along the ridge of Purn Hill. Both are green paths with outstanding elevated views across the Bleadon levels and beyond. From this point the existing caravan site and other referred developments are clearly seen. The extension as initially proposed (90 caravans) would have noticeably added to the mass of the caravan park when seen from Purn Hill, but its revision down to 40 additional caravan pitches is likely to have much less impact.

Other elevated views of the site include section of 'The West Mendip Way' national footpath which runs west to east along Purn Hill to Celtic Way. The Mendip Hills Area of Outstanding Natural Beauty (AONB) is located to the east and north of Purn Hill and also includes a number of elevated footpaths along 'Hellenge' Hill and to the east of Hillcote Estate. While these provide outstanding panoramic views across a vast landscape, there are relatively few places on these footpaths where the site would be visible. The improvements suggested above would however lessen the impact of the proposal. Views of the site from Uphill (near to the windmill) are possible but the impact that would arise from the proposal is insignificant.

A benefit of the reduced extension is that the outer edge of the caravans is now set back a substantial distance from the edge of the River Axe, such that it would now only have a minor impact on its setting. The impact of static units can be reduced if they were of a darker colour. On this matter, the applicant has confirmed that external materials for the static caravans will be a tile effect power coated in terracotta or dark green and the walls will be timber effect boarding. These materials and colours are likely to be more subtle and in-keeping with the semi-rural setting. A planning condition can be used to control the precise details. The locations of static units can also be secured through conditions as can the planting scheme. The layout of the caravans is also now much less dense when compared to the initial proposal with clusters of trees shown in the layout plan, which will further reduce the impacts of the development.

On balance, the proposal is likely to have a minor to medium landscape impact and the proposal is acceptable subject to planning conditions controlling the matters referred to above.

### **Transport and Parking**

The applicants Transport Statement (TS) has used the TRICS database to determine the likely trip generation from the proposed development. This projects the proposal will generate an additional 138 daily vehicle movements over the course of a day (based on the original proposal for 90 caravans), with a maximum of 12 additional vehicle

movements on to Bridgwater Road during its peak flow period. Officers consider this to have been a realistic assessment and even at these levels (before the scheme was subsequently reduced to 40 caravans), it is not considered this increase will likely to lead to a perceptible increase in localised traffic.

Some comments suggest the speed and volume of traffic on Bridgwater Road, particularly at the junction with Accommodation Road, makes this road unsafe and further turning movements. Highway safety records show there while there has been 6 accidents within the past 5 years within a section of Bridgwater Road that includes the junction with Bridgwater Road and the access into the holiday park (which will also be used to access the extension site) none of these incidents occurred as a result of traffic movements to and from the holiday park. Furthermore the visibility splays in each direction of the entrance point exceeds the requirements for a 50mph road. On this basis there is no reason to conclude that the additional traffic movements to and from site would be harmful to road safety. The access point itself, in terms of its width, barrier positions and the width of internal roads within the holiday park are acceptable.

In terms of accessibility to non-car travel, a footpath runs along the southern side of Bridgwater Road fronting the site linking to a bus stop providing regular services to Weston-super-Mare. In terms of return journeys or trips to the east, there is a bus stop on the opposite side of Bridgwater Road. Crossing the busy A370 is not ideal, but there are two pedestrian refuges on Bridgewater Road within the immediate vicinity of the site, with one served by a dropped crossing arrangement. This also provides an informal pedestrian crossing facility to the nearest local services in Bleadon village. The site is also well connected to the National Cycle Network Route 33 and the Brean Down Way linking Weston-super-Mare with Brean Down which can be accessed off Wayacre Drove, approximately 850m to the west of the site via Accommodation Road. The location of the site does therefore provide good opportunities to undertake some trips by more sustainable modes of transport.

Local car parking standards are set out in the North Somerset Parking Standards SPD and outline the minimum required number of car parking spaces for holiday park development, specifying 1 space per pitch, 1 space per 10 pitches for visitors and 1 space per 2 staff. This amounts to a requirement to provide 40 spaces for the caravans, 4 spaces for visitors and 4 spaces for staff. The layout plans shows that this provision is slightly exceeded.

There is no transport or parking objections to the application.

## **Biodiversity**

The proposal will result in more visitors to the site, with potential therefore for more people to visit the nearby Purn Hill SSSI. Natural England consider this has potential to adversely affect the special qualities of SSSI. The SSSI is however already accessible with rights of way crossing it. There is however no reason to suppose increased use this will contribute to harming the SSSI.

The impact of the proposal within the site itself has been much reduced since the scheme was reduced from 90 to 40 caravans. The development is now much further away from field boundaries (trees and hedges will be retained) and it is also significantly further away from the edge of the River Axe which is a wildlife site and a rhyne adjoining the site boundary.



Hence there is no reason to suppose the development will affect the biodiversity of the buffers areas alongside the rhyne or River Axe. Indeed these corridors are currently maintained as close cropped cut grass and this is unlikely to change as a result of the proposal. Additional native tree planting and management of the site is however proposed and this will go some way to mitigate the impact of additional caravans on the grass. Planning conditions will be imposed to prevent external lighting unless details are first agreed, which should reduce any adverse impacts on wildlife.

There is no objection to the proposal in terms of biodiversity.

## **Other Issues**

### **Archaeology**

Due to the location of this site the potential for archaeology is low to moderate. In the event of this application being approved an archaeological watching brief will however be required during the ground works phase.

### **Seasonal Occupation**

Government advice precludes planning restrictions which prevent year round occupation of caravans. However, conditions can still be applied which exclude holiday park caravans from being used as a primary or unrestricted residential accommodation and that they are solely used as holiday accommodation.

### **Public Right of Way**

The initial proposal would have resulted in the need for a diversion order of public footpath AX614. However, the revised proposal does not obstruct the defined route. The setting will change as a result of the proposal, but views towards the River Axe should be preserved.

## **Reasons for Over-riding comments from Bleadon Parish Council:**

The Parish Council say the developer should contribute to the general improvement of traffic issues likely to be caused by the development, particularly at the junction of the A370. Some other comments also suggest the speed and volume of traffic on Bridgwater Road, particularly at the junction with Accommodation Road, makes this road unsafe and further turning movements. Highway safety records show there while there has been 6 accidents within the past 5 years within a section of Bridgwater Road that includes the junction with Bridgwater Road and the access into the holiday park (which will also be used to access the extension site) none of these incidents occurred as a result of traffic movements to and from the holiday park. Furthermore the visibility splays in each direction of the entrance point exceeds the requirements for a 50mph road. On this basis there is no reason to conclude that the additional traffic movements to and from site would be harmful to road safety. The access point itself, in terms of its width, barrier positions and the width of internal roads within the holiday park are acceptable.

## **Recommendations**

**APPROVE** subject to conditions (see draft decision for conditions).

In recommending this application, I have taken into consideration the relevant policies of the Development Plan and the comments made by the consultees and other interested parties and the:

- Natural Environment and Rural Communities (NERC) Act 2006
- Crime and Disorder Act 1998
- Human Rights Act 1998.

Signed: Neil Underhay