
Planning Application no. SL/2022/075

Lakeland Leisure Park, Moor Lane,
Flookburgh, GRANGE-OVER-SANDS
LA11 7LT

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SL/2022/0725

Lakeland Leisure Park, Moor Lane, Flookburgh, GRANGE-OVER-SANDS, LA11 7LT



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Summary

SL/2022/0725

PARISH: Allithwaite and Cartmel

Lakeland Leisure Park, Moor Lane, Flookburgh, GRANGE-OVER-SANDS, LA11 7LT

PROPOSAL: Redevelopment of touring area to provide new pitches for the siting of static caravans with associated demolition, landscaping, infrastructure, and other works and an overall change to the total caravan pitches allowed at Lakeland Leisure Park to enable up to 1,147 pitches (Major application).

APPLICANT: Haven Leisure Limited.

Grid Ref: E: 337030 N: 473984

Committee date: 27th October 2022

Case Officer: Liz Arnold

The application has been called in by Councillor Gardner.

Recommendation

The recommendation is to approve the application.

1.0 Description and proposal

Site Description

- 1.1. The site is within a large established holiday park complex comprising lodges, static and touring caravans and camping field with associated leisure and support facilities. The total site area is 77 hectares. It is located at the southern end of Moor Lane, which is the main and only vehicular access to the site via the village of Flookburgh. The holiday park currently contains 907 static pitches and 185 touring pitches. The complex includes a golf course to the north east of the main site.
- 1.2. The application site covers an area of approximately 4.6ha, situated on the western side of the site and to the south of the main facilities. This is currently in use for touring caravans and can accommodate up to 120 caravans on a mix of surfaced and grass (serviced and unserviced) pitches for touring caravans and tents.
- 1.3. Morecambe Bay is located immediately to the south and east. The Bay is designated a Special Area of Conservation (SAC), Special Protection Area (SPA) Ramsar and SSSI. The site is within Flood Zone 3(a) high flood risk area because of the proximity of the shoreline. The remains of a transformer

plinth associated with the World War II RAF Cark airfield complex is located towards the south eastern boundary of the holiday park and is covered by a Scheduled Monument designation.

Proposal

- 1.4. The proposal is for the redevelopment of the touring area to provide new pitches for the siting of static caravans with associated demolition, landscaping, infrastructure, and other works and an overall change to the total caravan pitches allowed at Lakeland Leisure Park to enable up to 1,147 pitches.

Consultations

Arboricultural Officer

- 1.5. The landscaping proposals are fine, if they link the BNG to these as well they will probably be able to demonstrate a good percentage of gain.
- 1.6. Further to my email earlier today I have visited the site and can confirm the Tree Survey, AMS and protection measures are all acceptable. The trees on the landscaping plan will mitigate those lost to the proposed scheme.

Local Highway Authority and Local Flood Authority

Local Highway Authority response:

- 1.7. We have reviewed the Transport Assessment submitted by the Applicant and are satisfied that it will not pose a risk to the existing highway. Increase in traffic will have no significant effect on current highways conditions. Transport of the static caravans however should be arranged only outside of daily rush hours when traffic is minimal and obstructions will be minimal. Most appropriate route for the transportation should be provided for approval.
- 1.8. It would have been preferable for the footway along Moor Lane to be continuous between Lakeland Leisure Park and Flookburgh, however this would likely be difficult to achieve within the current highway corridor.

Lead Local Flood Authority response:

- 1.9. The LLFA do not have any records of flooding on this site and the Environment Agency (EA) surface water maps indicate that the site is in flood zone 3.
- 1.10. Proposed surface water drainage with attenuation and discharge to the existing watercourse is acceptable.

Conclusion:

- 1.11. In light of the above comments I can confirm that the Highway Authority and Lead Local Flood Authority has no objections to the proposal, subject to recommended conditions being included in any Notice of Consent which may be issued.

Countryside Access Officer

- 1.12. Public Footpath 550009 follows an alignment to the west side of the development area and must not be altered or obstructed before or after the development has been completed.
- 1.13. If the footpath is to be temporarily obstructed then a formal temporary closure will be required, there is a 12 week lead in time for this process

Environment Agency

- 1.14. We have reviewed the FRA in so far as it relates to our remit and we are satisfied that the development would be safe without exacerbating flood risk elsewhere if the proposed flood risk mitigation measures are implemented. The proposed development must proceed in strict accordance with this FRA and the mitigation measures identified as it will form part of any subsequent planning approval. Any proposed changes to the approved FRA and / or the mitigation measures identified will require the submission of a revised FRA.

Natural England

- 1.15. Natural England previously responded to an application to increase the number of static pitches on this site back in 2017. Our concerns then were related to increased recreational disturbance and a Condition was applied to the planning permission regarding interpretation boards to help address this issue. We also advised that access to the sea wall should be managed to ensure no access to the salt marsh or embankment . Natural England therefore request a brief update on these mitigation measures to assess whether further mitigation is required.
- 1.16. Natural England advise that a Construction Environmental Management Plan (CEMP) is also Conditioned.
- 1.17. Natural England has produced standing advice to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.

Allithwaite and Cartmel Parish Council

- 1.18. The application is for the redevelopment of the touring area to provide up to 97 pitches for siting of up to 97 static caravans with associated landscaping,

infrastructure, and other works, and a total of up to 1,147 static caravan pitches at Lakeland Leisure Park overall.

- 1.19. The Allithwaite and Cartmel Parish Council request that the impact of the proposed redevelopment within this application be fully considered by the SLDC planning team, and permission only be granted if it can be categorically demonstrated that the facilities and services can cope with the additional burden that will be created.
- 1.20. The entire site falls wholly within Flood Zone 2 and 3 and is within an area at risk of flooding from the sea.
- 1.21. **DRAINAGE**
United Utilities are aware that the existing drainage system dealing with foul and surface water is already at or in excess of its capacity. Adding additional caravans into this equation will place an unacceptable and additional burden on the sewer leading from the site.
- 1.22. It is requested that the District Council be completely satisfied from United Utilities in writing that the existing drainage system can cope fully with any additional caravans proposed on this site. If it cannot, or there is any doubt or concern on this matter, planning permission cannot and should not be granted for this application, or any other future application, until the drainage and sewerage system has been suitably upgraded.
- 1.23. **FOUL WATER DRAINAGE**
It is understood that the proposed developments will look to utilise existing points of connection onto the private foul drainage network within the leisure park. Any additional loading may need to consider the implications on the downstream network, which may require further upgrades
- 1.24. An appropriate surface water drainage strategy should be developed for the Touring Redevelopment site based on sustainable drainage principles in line with the relevant local and national policy and standards.
- 1.25. **HIGHWAYS.**
Moor Lane is heavily trafficked and of restricted width. Despite 30mph signs vehicles still travel at excessive and sometimes dangerous speeds especially upon entering this section of Moor Lane from Flookburgh Square. It is essential adequate measures are conditioned that will effectively reduce the speed of vehicles driving along Moor Lane from Flookburgh Square, to and from the Doctors Surgery, Cockles, Fat Flour and the pubs up to the existing extent of development towards Grange.
- 1.26. At present, Moor Lane accommodates a variety of vehicle types accessing both the Leisure Park and other developments on Moor Lane, including cars, touring caravans, service vehicles, site delivery vehicles (including HGV and LGV service vehicles) and emergency service vehicles.

- 1.27. The access onto Moor Lane from Flookburgh Square is a problem being a tight turn left from the B5277 (Grange) which narrows considerably. Parked cars and delivery vehicles are an added problem in this congested area. Travelling from Ulverston on the B5278 also encounters the same problems when turning sharp left, large vehicles have to use both carriageways, before, after 20m, having to turn sharp right. It is a bottleneck and dangerous in busy times.
- 1.28. **LANDSCAPE STRATEGY**
The existing vegetation surrounding the application site is adjoined by existing static caravans, site access roads to the site facilities/maintenance area and other static caravan communities as well as the main entrance spine road. To the west, one of the more open boundaries, the site is bordered by a site access road to other static caravan communities with an avenue of existing trees and a grass mound beyond which is the boundary of the park ownership.
- 1.29. The constraints noted by SLDC on the planning application are listed on the SLDC planning portal.
- 1.30. The Parish Council considers the planning application should not be considered for development. We already have enough development in the Parish. More would increase the already pressures on the infrastructure, especially water, sewage and drainage, schools and medical services. Opinions from local health providers in local surgeries in the three main villages, Cartmel, Flookburgh and Grange need to be sought.
- 1.31. Before this planning application is considered SLDC should ensure that services, including foul drainage, etc are considered a pre-requisite! Our locality has already changed from an area of natural greenery, to more of a growing urban settlement any developments will further change that appearance. The trees and hedgerows provide potential ecological habitats within and around the proposed development and must be retained.
- 1.32. The following policy is included in the pre-submission draft of the Allithwaite and Cartmel Neighbourhood Plan 2022-2032
- 1.33. **Page 44 Caravans and Chalet Parks**
2.4.11 Allithwaite and Cartmel is a popular tourist and visitor destination due to its location on the border of the Lake District National Park. It has a well-developed range of camping, caravan, and visitor accommodation. The character and quality of the landscape is fundamental to its attractiveness to visitors. This policy takes account of existing provision and takes a restrictive approach to new development to better ensure that new development supports the landscape character, giving attention to opportunities for new ways in which the camping and caravanning offer could diversify.
- 1.34. **2.4.12** The growth of this type of development although considered to be not permanent involves the provision of infrastructure – roads, power supplies, sewage and water which significantly impact on the rural nature of the

countryside. In addition, the disproportionately large increase in population puts pressure on services such as GP surgeries.

1.35. **Page 45 - Policy AC9 – Caravan and Chalet Parks**

The provision of new, or extensions to existing, caravan or chalet parks will only be supported where the development proposed would not have an adverse impact (individually or cumulatively) on the countryside in terms of landscape character and visual amenity in terms of immediate or long-distance views. There are several subsections A to J applicable to this policy.

Lower Holker Parish Council

1.36. Lower Holker Parish Council considered this Planning Application at their meeting on 7 September 2022 and object to the application for the following reasons:

1.37. **1 Residential Amenity**

The potential occupation of these proposed 1,147 pitches, which can accommodate 6 people per caravan, is 6,682. The population of Grange-over-Sands, the only town on the whole of Cartmel Peninsula, in the 2011 Census was only 4,115. Hence Lakeland Leisure plan to create the largest centre of population on the whole of the Cartmel peninsula ie a Town. The only access to this 'Town' is through the 4 small villages/hamlets of Lower Holker Parish which together have a total of occupied by 1,893 residents (2011 Census).

1.38. South Lakeland's Development Management Policies Development Plan Document Adopted 28 March 2019 Policy DM18 – Tourist accommodation – caravans, chalets, log cabins, camping and new purpose built self-catering accommodation (outside the Arnsdale and Silverdale AONB) states

'All proposals for both new sites and extensions to, and intensifications within existing sites, shall:

d) not have an adverse impact on surrounding residential amenity'

1.39. This development already has the following negative impacts on the resident community which would be exacerbated by additional development:

a) Health Services

Lakeland Leisure do not have any qualified health personnel available onsite, only First Aiders. This results in visitors to the site utilising the small GP surgery (part of the Nutwood Medical Practice) based in Flookburgh, which is only designed to accommodate the local population of under 2,000. The other local Medical Practice is Cartmel Surgery. The Planning Statement submitted with the Planning Application confirms that *'Both Practices identified that there are a high number of temporary patient registrations and that they are generally under strain as a result.'* The resident population (of less than 10,000) on the Cartmel Peninsula has proportionately more elderly residents (over 65) ie 34.5% compared to the average in England (23%), hence the needs of the local population for health services is already high and this additional demand from the visitors to Lakeland has a

detrimental impact on the availability of timely health services to these residents.

b) Sewage

The Cartmel Peninsula's sewage infrastructure is already unable to manage the quantity of sewage created. Untreated sewage is regularly being discharged into Morecambe Bay, causing a health hazard both to residents, visitors and fishermen. Any increase in the quantity of sewage would result in an increased risk of discharges taking place.

c) Water Supply

Residents who reside at higher elevations within the villages of Flookburgh and Allithwaite report a marked decrease in water pressure during the open season of the caravan site. This is an illustration of the lack of adequate water supply infrastructure to accommodate the current numbers of caravans and would deteriorate further if additional development was permitted without additional infrastructure being installed.

1.40. **2 Road Network**

The Lakeland Leisure site is accessed through Flookburgh Square, which is a junction of 5 routes and the location of essential services (Chemist, Post Office & Bus Stops) and retail establishments (Bakery, Grocery Store, Public House, Takeaway & Hairdresser). It is also the location of the Village Hall. As such it is the hub for the local community. The quantity of traffic which is already passing through Flookburgh Square in relation to Lakeland Leisure, both visitor traffic and moving mobile homes, has already created an unsafe environment where less mobile residents are unable to access these services as they judge it to be unsafe. Any additional development would create further inconvenience and risks.

- 1.41. South Lakeland's Development Management Policies Development Plan Document Adopted 28 March 2019 Policy DM18 – Tourist accommodation – caravans, chalets, log cabins, camping and new purpose built self-catering accommodation (outside the Arnside and Silverdale AONB) states '*All proposals for both new sites and extensions to, and intensifications within existing sites, shall:*

d) not give rise to unacceptable impacts on the local road network, either through traffic generation from the site itself, or through cumulative impacts alongside other sites;

- 1.42. Contrary to the statement in Transport Assessment submitted with the Planning Application that '*Moor Lane does not have any formal infrastructure, nor is it classed as a cycle route by Cumbria County Council*' that part of Moor Lane (500 metres) between the junction with Winder Lane and Flookburgh Square is on National Cycle Route 700 (Bay Cycle Way).

1.43. a) Visitor Traffic

The traffic data within the Transport Assessment submitted with the Planning Application has data from a week within April 2022, suggesting total additional

traffic generated (both in and out of the site) of around 13,000 a week, with a maximum of 2,500 a day, approximately 50% in each direction.

The Parish Council records vehicles travelling from Flookburgh down Moor Lane using a Speed Indicator Device. The average 'out of season' eg March is less 5,000 per week in one direction so on the basis of 50% each way, shows total vehicle journeys of less than 10,000 per week. If this is compared to 'high season' ie July, in the week beginning 25 July 2022 there were 15,404 vehicles recorded travelling down Moor Lane, so on the basis of 50% in each direction that is a total of 30,000 vehicle journeys ie an additional 20,000 vehicle journeys compared to out of season. On one day (Friday 29 July 2022) there were 2,978 vehicles travelling down Moor Lane (based on 50% each way approximates to 6,000 vehicle journeys). All these vehicles are travelling through Flookburgh Square. See SID Data 2022 (Appendix).

The 'Check In' arrangements at Lakeland Leisure create additional difficulties as they have specified times on Monday and Friday afternoons and as the New Arrivals Lodge installed in 2021 is located close to the entrance this results in substantial traffic queues along Moor Lane. These queues can be for up to 3 hours at a time and compromise access for the Emergency Services of 'Bay Search and Rescue' whose base is near the entrance, the local farmers who need to access their fields and livestock and fishermen who needs to access the shore during specific times in relation to the tides.

1.44. b) Mobile Home Transportation

The transportation of mobile homes to and from the site creates local traffic difficulties as the access is on small B roads then on an unclassified through Flookburgh Square. There is an agreement in place that these should only be transported through Flookburgh between 10 am and 4 pm, so that they do not have a detrimental impact on communiting traffic, including school buses. This was reconfirmed in an email received on 12 November 2012 from John Bratherton of Bratherton Park Design Consultation when he stated that "*Jonathan Stratford confirmed that the obligation made within the Planning Consent of 2004 to restrict the caravan movements to no more than three per day is still in place and caravans do not move through Flookburgh except between the hours of 10am and 4pm to avoid busy commuting times at the beginning and end of each day.*" This condition should be re-stated in any future granting of any planning permission in relation to this site.

The caravan transportation companies and site staff have frequently ignored this agreement, blame being placed on the central Haven office and the caravan companies, with mobile homes being transported through Flookburgh at random times. At 4.23 pm on Monday 1 August 2022 a caravan was being transported through Flookburgh Square and caused a complete stoppage on all 5 routes into the Square for over 30 minutes. It was only able to be moved due to a person/persons breaking into a parked car, pushing it out of the way and then pushing it back. See Photo 1 (Appendix)

In addition to this inconvenience, damage has been caused to parked vehicles of residents by the transportation companies. An example of this was on 8th July 2020 when a transportation company moving a mobile home outside the specified hours through Cark damaged the wing mirror of a resident's campervan. The company first denied causing the damage (though it was recorded on CCTV) and then refused to pay for the repairs. The Parish Council contacted the site manager and only when the resident spoke to MP Tim Farron did the company finally pay for the repairs.

1.45. **3 Economic Benefits**

South Lakeland's Development Management Policies Development Plan Document Adopted 28 March 2019 Policy DM18 – Tourist accommodation – caravans, chalets, log cabins, camping and new purpose built self-catering accommodation (outside the Arnside and Silverdale AONB) states '*All proposals for both new sites and extensions to, and intensifications within existing sites, shall:*
h) demonstrate the delivery of tangible local economic benefits.'

- 1.46. Based on the stated average spend onsite in 2021 in the Planning Statement submitted with the Planning Application, the estimated onsite spend for the additional 147 static caravans is £132,000. This would indicate the expected onsite spend for 1,147 pitches would be just under £1,000,000 which doesn't include income from the rental of the caravans.
- 1.47. Lakeland Leisure have not provided any direct practical or financial contributions to the local community, other than when employing or utilising some local businesses. They have been repeatedly asked over the years (usually when Parish Councillors are invited onsite when they are preparing another planning application) whether local school children could use the pool for their swimming lessons, rather than schools paying to transport them to the nearest public pool in Ulverston (12 miles away). Promises have been made at these meetings but nothing has happened.
- 1.48. Littering on the Moor Lane down to the site at Lakeland Leisure is considerable. Local Councillors and residents have arranged litter picks and invited the staff of Lakeland Leisure to take part, but again despite promises nothing has been done. The Parish Council has installed, at their own expense, additional litter bins on Moor Lane which they also pay to have emptied
- 1.49. Littering on the Moor Lane down to the site at Lakeland Leisure is considerable. Local Councillors and residents have arranged litter picks and invited the staff of Lakeland Leisure to take part, but again despite promises nothing has been done. The Parish Council has installed, at their own expense, additional litter bins on Moor Lane which they also pay to have emptied.
- 1.50. The Parish Council bought a local site on Moor Lane and (together with a local charity) raised substantial funds over many years to install a new playground and adult exercise area which opened in 2017. Visitors and residents regularly use the site. The Parish Council is totally responsible for maintaining the site, including

grass cutting, repairs, litter bins, safety checks etc. Lakeland Leisure have never made any financial or practical contributions at all to this site.

- 1.51. In conclusion, the costs to the local community in relation to reduced residential amenity, negative impacts on the road network and lack of economic benefits to the local community outweigh any benefits this excessive overdevelopment of the site would bring.

Public Responses

- 1.52. 8 letters of representation, including one from Cllr Hanlon, have been received raising the following issues:
- The traffic problems in Flookburgh Square are already horrendous. More caravans mean more traffic.
 - There are already proposals to build a lot more houses in Flookburgh. Added together this will result in even more gridlock
 - The swapping of tourers for static will vastly increase the number of cars. One tourer equals one car, one static can equal three cars
 - The parking in the village cannot sustain the volume of cars visiting our amenities, parking where they want
 - The Haven site impacts on both water pressure and the waste system, reducing water pressure considerably to other residential properties during peak season
 - Highway safety grounds for increased pedestrians on substandard roads
 - Over development in a rural area
 - The site with 1147 pitches is already greater than the village of Cartmel
 - Relief road required
 - Existing issue with sewerage leakage, which the Environment Agency are having trouble fixing, which will be exacerbated
 - Impact on leaked sewage on health of residents, animals and inhabitants of the bay and SSSI
 - Strain on emergency services and doctors
 - Requested map (during LP consultations) showing the extent of all development in the area over the last 10 years but this has not been received
 - Increasing the number of static sites to 1147 will stop us reaching CO2 targets

- Vehicles stationary on Mile End Road due to poor check in access at the Haven Gates, increasing pollution and inconvenience. The access arrangements should be revisited
- Limited public transport for locals and virtually none for the Haven site
- Tourism must move to a sustainable model and therefore it is up to the owners of Lakeland Leisure to start to provide multi occupancy vehicles or contribute to new local community transport schemes
- Long term the site lies within the flood plain likely to be inundated by rising sea levels by 2050. Concrete bases reduce the capability of the site to absorb excess rain or flood water
- It is noted the EA objected to 1 additional static caravan at a local dwelling on environmental flooding grounds. I assume they will object to the addition of this significant number
- Tourism is welcomed as long as it is sustainable and benefits local communities. 'Leave no trace' is a strapline for good tourism. In the long term this will damage our communities, environment and landscape
- Increased risk of flooding
- Railway bridge entering the village is in a poor state of repair and more traffic will impact its stability
- Concerned over the high numbers of holiday accommodation, touring caravans and static caravans there are locally

2.0 Relevant planning history

2.1. The notable planning applications relating to the application site are as follows:

- SL/2022/0337 - Variation of conditions 2 (approved plans), 3 (hard & soft landscaping), 9 (ecology), 11 (mitigation strategy) & 12 (surface water drainage) attached to planning permission SL/2020/0095 (Removal of condition 13 (Highway Improvements) attached to planning permission SL/2017/0883 (Installation of 85 hardstanding bases (for 85 static caravans) with associated infrastructure (above and below ground), new internal access road, pedestrian footpaths and landscaping) (approved July 2022)
- SL/2020/0095 - Removal of condition 13 (Highway Improvements) attached to planning permission SL/2017/0883 (Installation of 85 hardstanding bases for static caravans, new internal access road, footpaths and landscaping) (approved March 2022)

- SL/2017/0883 - Installation of 85 hardstanding bases (for 85 static caravans) with associated infrastructure (above and below ground), new internal access road, pedestrian footpaths and landscaping (approved February 2018)
- SL/2016/0940 - Installation of 39 static caravan pitches and extension of the existing Otter Lake with associated landscaping and infrastructure above and below ground (approved February 2017)
- SL/2012 0859 - Reduction in number of caravans, formation of a lake, erection of owners building, leisure facilities and associated works (approved January 2013)
- SL/2003/2015 - 9 hole golf course, extension to & redevelopment of caravan site, caravan sales area & office, reception & office & associated works & landscaping (approved November 2003)

The original site was established many years ago and contained approximately 920 tightly sited static caravans in a grid pattern. Over the years the site has evolved and grown through a series of extensions to the site area, remodelling of units and layouts, reductions in the unit density in some of the areas and the provision of additional on-site facilities.

3.0 Relevant planning policies

National Planning Policy Framework

Chapter 2, Achieving sustainable development

Chapter 4, Decision Making

Local Development Policies

South Lakeland Core Strategy Policies (CS)

CS1.1 - Sustainable Development Principles

CS4 - Cartmel Peninsular

CS7.6 - Tourism Development

CS8.2 - Protection and Enhancement of Landscape and Settlement Character

CS8.4 - Biodiversity and Geodiversity

CS8.5 - Coast

CS8.6 - Historic Environment

CS8.8 - Development and Flood Risk

CS10.2 - Transport impact of new development

South Lakeland Development Management Development Plan Document Policies (DM)

- DM1 – General Requirements for all development
- DM2 - Achieving Sustainable High Quality Design
- DM3 - Historic Environment
- DM4 - Green Infrastructure
- DM18 - Tourist accommodation

4.0 Assessment

- 4.1. The main issues and material planning considerations include the principle of development, landscape and visual impacts, highway impact considerations, flood risk and drainage and ecology.

Principle of the Development

- 4.2. Policy CS7.6 of the CS supports the creation, enhancement and expansion of tourist attractions and tourism infrastructure in accordance with the development strategy in CS1.2 of the Core Strategy. It is stated that development should be of an appropriate scale and be located where the environment and infrastructure can accommodate the visitor impact. Particular emphasis is placed on improving the quality of existing visitor accommodation and the need to broaden the range of accommodation provided.
- 4.3. Policy DM18 of the Development Management Policies supports proposals for intensification or extension to existing caravan site subject to meeting criteria a) to h) set out below:
- a) be of a scale and design appropriate to the locality; and
 - b) not have an adverse impact (individually or cumulatively) on the countryside or coast, in terms of landscape, character and visual amenity; and
 - c) be capable of being effectively screened by existing landform, trees or planting. Additional effective landscaping may be needed to supplement existing landscaping; and
 - d) not have an adverse impact on surrounding residential amenity; and
 - e) not give rise to unacceptable impacts on the local road network, either through traffic generation from the site itself, or through cumulative impacts alongside other sites; and
 - f) protect and enhance biodiversity assets; and
 - g) be constructed of appropriate external materials and colours that are sympathetic to its locality; and

h) demonstrate the delivery of tangible local economic benefits

- 4.4. As an established holiday park, the principle of extending the site subject to scale and detail is considered to be acceptable in policy terms. The site has a long and complex planning history and has evolved over a period of time with changes to the site layouts, with both the addition and removal of static units.
- 4.5. The existing permissions permit no more than 993 static caravans at the Park, with an additional 120 touring pitches giving a total pitch number of 1113. This proposal would remove the 120 touring pitches to be replaced with 97 static caravan pitches, giving a decrease of 23 pitches in this area of the site.
- 4.6. In addition there has been a holistic review of the park, including the redevelopment of the Eastern Triangle, as originally considered under application SL/2017/0883 and amended under application SL/2022/0337, for the installation of 85 static caravans. This consent has been implemented but cannot be completed as this would extend the number of pitches beyond the approved 993.
- 4.7. The agent has provided a breakdown of the resultant requirement from the existing 1113 pitches:
- Less 23 from the this proposal for the redevelopment of the touring pitches
 - Less 38 from the enhancement of existing static pitches (under PD rights)
 - Plus 85 from the extant Eastern Triangle
 - Plus 10 infill pitches

Total requirement of 1147 pitches

- 4.8. The proposal would be an uplift of 34 pitches from the total approved 1113. It is noted that these pitches would all be included within the existing Park boundaries.
- 4.9. In the context of the above and given the scale of the proposal, the principle of the proposed development is therefore considered to be acceptable, subject to site specific matters.

Landscape and visual Impact of the Proposed Development:

- 4.10. The application site is located in an area of 'Sub type 2d Coastal Urban Fringe' as defined in the Cumbria Landscape Character Guidance and Toolkit. The proposed development is located within the existing developed extent of the holiday park, it would be contained within an area which is relatively well screened from wider public vantage points, particularly given the proposed landscape mitigation works.
- 4.11. Although the proposal will result in the loss of some of the existing landscaping within the plot, the Arboricultural Specialist has confirmed that the trees on the landscaping plan will mitigate those lost to the proposed scheme.

- 4.12. The density of the development will be relatively low, and the layout also includes areas of planting and feature open spaces. These will help to assimilate the visual impacts of the development within the wider landscape.
- 4.13. Whilst the proposed development would change the character of this part of the application site, giving it a permanent more structured appearance than the touring plots, given the location of the site and the context of the existing development, the resulting magnitude of landscape change and visual impacts would not be significant.

Highway Considerations.

- 4.14. The main and only access to the site is via Moor Lane, a long straight minor road which leads southwards from the village square in Flookburgh and terminates at the site, being approximately 1.2 miles long. The road serves a number of other business and residential sites in the area as well as Cark airfield and has a 30mph speed limit along the northern section and a 40mph for the remaining part up to the entrance to the Holiday Park. There are some traffic calming measures along the length of the road including surface treatments and signage. A footpath runs alongside most but not all of the road between the centre of the village and the access to the Holiday Park.
- 4.15. The submitted Transport Assessment confirms that the proposal once completed would generate an additional 3 two way trips during the AM development peak hour which is between 8am and 9am and an additional 5 two way trips during the PM development peak hour between 5pm and 6pm. Over the course of the day there would be an increase of 61 two way trips. The report contends that in the context of the current overall traffic movements, the resulting highway impact would be negligible on the operation of the local highway network.
- 4.16. The submitted Travel Plan identifies measures to promote sustainable forms of transport to the Holiday Park including travel by staff. These include the promotion of walking and cycling and public transport initiatives.
- 4.17. Given that there is only one route to the site, a Construction Traffic Management Plan would be required in order to ensure minimal disruption to local communities. This should include a dedicated construction route and vehicle management measures to accommodate abnormal loads arriving at the site. This could be conditioned for submission if all other aspects of the proposal were acceptable.
- 4.18. The proposal includes one to two parking spaces per static pitch in addition to communal on-site parking which is considered to be adequate for the development.
- 4.19. The Highways Officer has confirmed that they have no objections to the proposal from a highways perspective. However they requested a condition restricting delivery of the caravans 'not during day time hours, especially during peak hours'. There is an ambiguity and unreasonableness to the wording of the proposed condition, such that it would be unenforceable. Given that the

intention is to minimize disruption to local residents the proposed wording could inadvertently result in increased heavy traffic movements in the evenings and through the night, resulting in greater noise and disturbance, As such a condition restricting traffic movements during peak time is proposed.

Flood Risk and Drainage

- 4.20. The submitted Flood Risk Assessment confirms that the proposed development is located in Flood Zone 3, and is at a high risk of flooding because of the proximity of the shoreline of Morecambe Bay. The site is however defended by a coastal embankment which affords protection against the 1 in 200 year tidal forecast for this area. Sites used for holiday caravans are classed as 'more vulnerable' and would only be acceptable subject to a specific warning and evacuation plan.
- 4.21. Risk from fluvial and surface water flooding is also considered to be low based on EA mapping and data. Inherent mitigation can be afforded to the proposal due to the current limited occupancy period, extension of the existing flood management, flood warning and evacuation plans and typical construction practices elevating the caravans above surrounding ground levels.
- 4.22. The Environment Agency has confirmed that they are satisfied that the development would not be at an unacceptable risk of flooding or exacerbate flood risk elsewhere providing it proceeds in strict accordance with the submitted FRA.
- 4.23. The Lead Local Flood Authority have also confirmed that they have no objection to the drainage elements of the development proposal.

Ecology

- 4.24. An Ecological Assessment is submitted in support of the application. There are no statutory ecological designations within the site, although the site directly adjoins the Morecambe Bay designated areas. The report also identifies area of local ecological importance. There is also the potential for the presence of some protected species on the application site, including Badgers and Great Crested Newts.
- 4.25. A small plantation woodland strip lies at the west of the site. To the south and east of the site are strips of mixed plantation woodland. At the east this forms part of a woodland trail for residents of the camp site to use. Proposals show that areas of woodland which are of local ecological value are to be retained and should be buffered appropriately and protected during construction through the erection of tree protection fencing as advised by an arborist. Further enhancements should include native tree and scrub planting.
- 4.26. Mitigation measures are proposed to both safeguard and in part enhance the habitat of the protected and notable fauna. The report concludes that whilst some loss of habitat on the site will be inevitable, the losses would be more than compensated through the incorporation of wildlife habitats as part of the green

infrastructure, including the habitat management of the adjacent golf course. Additionally measures would be introduced to manage potential disturbance from recreational activities associated with the use of the site. A Planning Condition is proposed to require further protected species survey work prior to the commencement of development and to secure that the works be completed in accordance with the relevant measures set out in the submitted report.

- 4.27. An assessment of the likely significant effect on the European Sites has been completed. This concluded that an Appropriate Assessment is not required.
- 4.28. Potential exists for impacts upon Morecambe Bay during construction. A Construction Environmental Management Plan (CEMP) is considered appropriate to ensure that measures are put in place to mitigate the potential impacts. Therefore, a Planning Condition is proposed to secure a CEMP prior to commencement of development, with particular regard to sediment control.
- 4.29. Natural England raised no objection in principle to the proposal. However additional information was requested to confirm that the interpretation boards and management of the access to the sea wall, as conditioned under 2017 application, had been implemented. This information was provided and updated to Natural England. A condition has also been included requiring mitigation measures and the potential requirement for further survey work, particularly in respect of Badgers and Great Crested Newts and the need for the applicant to obtain a license.

Biodiversity net gain

- 4.30. Policy DM4 of the Development Management Policies DPD and Para 170 of the NPPF require that all development proposals, unless it can be demonstrated that it is not possible, should result in environmental net gains for biodiversity. These gains are to be qualitative and need to be demonstrated to be a net gain of development. Measures to secure net biodiversity gains may include the provision of bird boxes, bat boxes, fruit trees, flowering plants and shrubs to enhance ecological networks and biodiversity in the vicinity of the site. It also advises that new development should protect and enhance existing trees unless there are clear and demonstrable reasons why their removal would aid delivery of a better development overall. In the context of this policy trees also refers to hedgerows.
- 4.31. Natural England Biodiversity Metric 2.0 is available as a mechanism available to developers to calculate biodiversity net gains and demonstrate these to Local Authorities, however no such assessment has been submitted.
- 4.32. Notwithstanding this drawing number 1001 C, identifies the level of existing trees which would be removed as a result of this proposal and the levels of replacement planting including trees, hedgerow, amenity planting and wildflower grassland.
- 4.33. The Arboricultural Officer has confirmed that the landscaping proposals are acceptable and if they are linked to biodiversity net gain, they would be able to demonstrate a good percentage of gain.

Heritage

- 4.34. The remains of the transformer structure which is part of the designated scheduled monument associated with the air field would be retained and would not be directly affected by the development. It would be incorporated within the proposed landscaped amenity area along the south eastern boundary of the site. The proposed landscaping has been designed so as to protect the setting of the structure and provide a visual buffer from the developed area and the caravans. As such it is considered that the proposed development would not result in any harmful impacts upon the character appearance or setting of the designated heritage asset.

Conclusion

- 4.35. It is considered that the extension of this established Holiday Park as proposed is acceptable in principle. It is of an appropriate scale and form which would not result in any significant landscape and visual impacts, subject to appropriate landscaping mitigation. The Highways Officer has confirmed that he has no objections to the proposal. The minor adverse impacts of the proposed development would be outweighed by the potential economic and ecological benefits. The proposal would therefore accord with Core Strategy Policies CS1.1, CS7.6 and CS8.2

5.0 Recommendation

- 5.1 Approval subject to conditions:

(1) The development hereby permitted shall be commenced before the expiration of THREE YEARS from the date hereof.

Reason To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

(2) The development hereby permitted shall be carried out in accordance with the following approved plans:

- Location Plan – LA/LD02/01 Rev B
- Site Plan Touring Area: Proposed - LA/LD02/03 Rev D
- Proposed Overall Masterplan - LA/LD04/01 Rev B
- Site Plan Whole Park: Proposed – LA/LD04/03
- Tourers to Static - 1001 Rev C
- Tourers to Static Indicative Sections – SE01 Rev B
- Tourers to Static – SK01 Rev D
- Tree Constraints Plan - 1831-KC-XX-YTRE-TPPO1 Rev O
- Tree Protection Plan – 1831-KC-XX-YTRE-TPPO1 Rev C
- Flood Risk Assessment
- Sustainable Drainage Report
- Framework Travel Plan

- Landscape Strategy
- Arboricultural Method Statement
- Transport Assessment

Reason For the avoidance of doubt and in the interests of proper planning.

(3) a) Prior to the installation of any of the lodges and caravans hereby approved on the site, full details of the design and external materials and finishes of the lodges shall be submitted to and approved in writing by the Local Planning Authority.

b) The approved details shall be fully implemented and retained thereafter.

Reason To protect the amenity of the area in accordance with policy CS8.2 of the South Lakeland Core Strategy.

(4) The lodges and caravans hereby permitted shall not be occupied other than as holiday accommodation. They shall not be used at any time as sole and principal residences by any occupants.

Reason To safeguard the local tourist economy in accordance with Policy CS7.6 of the South Lakeland Core Strategy.

(5) A register of all occupants of the accommodation hereby approved shall be maintained at all times and shall be made available for inspection by the Local Planning Authority on request. The register shall comprise consecutively numbered pages, which shall be kept in order, and each entry shall contain the name and address of the principal occupier together with the dates of occupation.

Reason To safeguard the local tourist economy in accordance with Policy CS7.6 of the South Lakeland Core Strategy.

(6) No development shall take place, until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority.

The approved Construction Vehicle Management Plan shall be adhered to throughout the construction period.

Reason These details are required to be approved before the commencement of development to safeguard the amenity of neighbouring occupiers in accordance with National Planning Policy Framework.

(7) No static caravans shall be delivered to the site between 08:00-10:00 and between 16:00-18:00 on any day. A record of all heavy goods vehicles leaving/accessing the site each day shall be maintained by the operator at all times and access to this record shall be afforded to the Local Planning Authority on request.

Reason: To keep to acceptable levels the impact of lorry traffic on the amenity of local residents and other road users. To support Local Transport Plan Policies.

(8) Prior to the commencement of any development, a surface water drainage scheme, based on the hierarchy of drainage options in the National Planning Practice Guidance with evidence of an assessment of the site conditions (inclusive of how the scheme shall be managed after completion) shall be submitted to and approved in writing by the Local Planning Authority.

The surface water drainage scheme must be in accordance with the Non-Statutory Technical Standards for Sustainable Drainage Systems (March 2015) or any subsequent replacement national standards and unless otherwise agreed in writing by the Local Planning Authority, no surface water shall discharge to the public sewerage system either directly or indirectly.

The drainage scheme submitted for approval shall also be in accordance with the principles set out in the Flood Risk Assessment & Drainage Statement proposing surface water discharging to watercourse.

The development shall be completed, maintained and managed in accordance with the approved details.

Reason: To promote sustainable development, secure proper drainage and to manage the risk of flooding and pollution. This condition is imposed in light of policies within the NPPF and NPPG.

(9) The development shall not proceed except in accordance with the mitigation strategy described in the submitted Preliminary Ecological Appraisal prepared by Tyler Grange dated 10 October 2022 and received by the Local Planning Authority on 12 October 2022.

Reason: For the avoidance of doubt and to prevent harm to protected species in accordance with Policy CS8.4 of the South Lakeland Core Strategy.