

Agenda Item A12	Committee Date 7 January 2018	Application Number 18/01239/FUL
Application Site Gibraltar Farm Campsite Lindeth Road Silverdale Carnforth		Proposal Creation of hard standings for 37 caravan pitches and associated access roads
Name of Applicant Mr & Mrs James Burrow		Name of Agent Mr Glynn Burgin
Decision Target Date 8 January 2019		Reason For Delay None
Case Officer		Mrs Eleanor Fawcett
Departure		None
Summary of Recommendation		Approval subject to receipt of acceptable amended plans

1.0 The Site and its Surroundings

- 1.1 The application site relates to an existing caravan site located adjacent to a farm complex, accessed off Lindeth Road, at the southern edge of Silverdale. It is set back from the highway and the land slopes downwards to the west. Most of the site is grassed and there is an access road through this to the pitches, some of which are surfaced. A small part of the site is wooded and is designated as an ancient woodland and a Biological Heritage Site (Cow Close Wood BHS) which covers a larger area extending mostly to the southwest. It is also covered by a limestone pavement order (Heald Brow) which covers a larger area than the woodland. Parts of the woodland surrounding the site are also covered by a Tree Preservation Order (TPO). To the west of the caravan site is a large associated camping area and beyond this is agricultural land which also extends to the north of the site and is bounded by stone walls.
- 1.2 The site is located within the Arnside and Silverdale Area of Outstanding Natural Beauty (AONB) and the Countryside Area, as identified on the Local Plan Proposals Map. Morecambe Bay is located approximately 300 metres to the west, and is designated as a Site of Special Scientific Interest (SSSI), Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar Site. The application site is also located within a Mineral Safeguarding Area.

2.0 The Proposal

- 2.1 Planning permission is sought for the creation of 37 hard standings to provide formal caravan pitches for all the existing grassed pitches and for tracks to be provided to most of these. These are distributed across the site. The pitches and tracks will be constructed using 100mm of limestone chippings.

3.0 Site History

- 3.1 In March 2013 a report was taken to Planning Committee in order to resolve issues in relation to an intensification of use at the site, including the addition of areas of hardstanding following significant concerns being raised by members of the public. It was resolved that the Local Authority enter into a

Section 106 Legal Agreement with the owners of the caravan site in order to regulate the existing uses of the land, and provide some control over works which might usually not require consent. The legal agreement was completed on 9 December 2013. The important details contained in the agreement that are relevant to this planning application are that it:

- Defines the parts of the site to be used by touring caravans as parcels 1a and 1b. The details indicated are that the site shall contain 60 pitches for touring caravans, 37 of which are marked out with hardstanding.
- Clarifies that the number of touring caravans (within the defined area) is set at 60 pitches according to the Council's Environmental Health Caravan Site Licence dated 15 August 2011.
- Includes a Council Covenant (in the Third Schedule) which states: "The City Council acknowledges that the number of touring caravans may be increased if a new Caravan Site Licence is issued for a higher number (currently set out in the City Council's Environmental Health Caravan Site Licence dated 15 August 2011)."
- The owners shall obtain express planning permission for development or use of land not authorised by the agreement.

The plan referred to within the legal Agreement is appended to this report.

- 3.2 Since the agreement was signed, the owners sought consent for a new Caravan Site Licence from the Council's Environmental Health Service for an additional 14 caravan pitches. The new Site Licence was issued on 23 April 2014, and it includes consent for 74 pitches.
- 3.3 An application was submitted in January 2018 for the creation of 11 hard standings to provide formal pitches towards the northwest corner of the caravan site and three access tracks to serve these pitches. The application was withdrawn before it was determined.
- 3.4 The relevant site history is set out below.

Application Number	Proposal	Decision
18/00077/FUL	Creation of hard standings for 11 caravan pitches and associated access roads	Withdrawn
10/00253/ELDC	Application for a Certificate of Lawful (Existing) Use of Land as a Touring Caravan Site (Re-Submission of 09/00704/ELDC)	Approved
09/00704/ELDC	Application for existing lawful development certificate for use of land as a caravan site and non - compliance with conditions 3 & 4 of application reference 1/76/1303 relating to numbers of caravans on the site and time period for use as camping site	Split decision
1/76/1303	Use of land for touring caravans (limited to 15 and between 1 March and 31 October)	Approved

4.0 Consultation Responses

- 4.1 The following responses have been received from statutory and non-statutory consultees:

Consultee	Response
Parish Council	No comments to make.
Environmental Health	No comments received within the statutory consultation period.
County Highways	No objection.
Natural England	Comments. The application could have potential significant effects on Arnside & Silverdale AONB. An assessment of the potential impacts of the proposal on the AONB is required. Without this information, Natural England may object.
Arnside and Silverdale AONB	Object. There will be an irrevocable change to the local landscape character and the visual amenity from the surrounding countryside will be adversely affected: a loss of

Unit	an open greenfield and agricultural area, creating a formal and urbanised site; more caravans and motor homes will be present on the site for more of the year and there is potential for additional paraphernalia; and an adverse impact on the ancient woodland, biological heritage site and limestone pavement order.
Lancashire Archaeological Advisory Service	Comments. Would be satisfied if documentation was supplied showing that the mound in the northwest corner will not be disturbed. If not, formal archaeological works would be required and can be conditioned.
Woodland Trust	Object. Will damage and cause direct loss to Cow Close Wood, an Ancient Semi Natural Woodland
Lancashire Fire and Rescue Service	Comments. It should be ensured that the scheme fully meets all the requirements of Building Regulations Approved Document B, Part B5.

5.0 Neighbour Representations

- 5.1 1 piece of correspondence has been received which provides the following comments in relation to the proposal:
- There is a problem with the water supply in the area which should be resolved before any further visitor facilities are provided.

6.0 Principal National and Development Plan Policies

6.1 National Planning Policy Framework (NPPF)

Paragraph 48 – Weight of emerging plan
Paragraphs 83 and 84 – Supporting a prosperous rural economy
Paragraphs 124 and 127 – Achieving well-designed places
Paragraph 170 and 172 – Areas of Outstanding Natural Beauty
Paragraphs 170,175 and 176 – Protecting and enhancing biodiversity

6.2 Local Planning Policy Overview – Current Position

At the 20 December 2017 meeting of its Full Council, the local authority resolved to publish the following 2 Development Plan Documents (DPD) for submission to the Planning Inspectorate:

- (i) The Strategic Policies and Land Allocations DPD; and,
- (ii) A Review of the Development Management DPD.

This enabled progress to be made on the preparation of a Local Plan for the Lancaster District. The DPDs were submitted to the Planning Inspectorate on 15 May 2018 for independent Examination, which is scheduled to commence in spring 2019. If the Inspector finds that the submitted DPDs have been soundly prepared they may be adopted by the Council later in 2019.

The Strategic Policies and Land Allocations DPD will replace the remaining policies of the Lancaster District Core Strategy (2008) and the residual ‘saved’ land allocation policies from the 2004 District Local Plan. Following the Council resolution in December 2017, it is considered that the Strategic Policies and Land Allocations DPD is a material consideration in decision-making, although with limited weight. The weight attributed to this DPD will increase as the plan’s preparation progresses through the stages described above.

The Review of the Development Management DPD updates the policies that are contained within the current document, which was adopted in December 2014. As it is part of the development plan the current document is already material in terms of decision-making. Where any policies in the draft ‘Review’ document are different from those adopted in 2014, and those policies materially affect the consideration of the planning application, then these will be taken into account during decision-making, although again with limited weight. The weight attributed to the revised policies in the ‘Review’ will increase as the plan’s preparation progresses through the stages described above.

6.3 Lancaster District Core Strategy (adopted July 2008)

SC1 – Sustainable Development
SC5 – Achieving Quality in Design

6.4 Lancaster District Local Plan - saved policies (adopted 2004)

E3 – Development Affecting Areas of Outstanding Natural Beauty

E4 – Countryside Area

6.5 Development Management Development Plan Document (adopted July 2014)

DM7 – Economic Development in Rural Areas

DM14 – Caravan Sites, Chalets and Log Cabins

DM27 – Protection and Enhancement of Biodiversity

DM28 – Development and Landscape Impact

DM29 – Protection of Trees, Hedgerows and Woodland

DM33 – Development Affecting Non-Designated Heritage Assets or their Settings

DM34 – Archaeological features and Scheduled Monuments

DM35 – Key Design Principles

6.6 Draft Arnsdale and Silverdale Area of Outstanding Natural Beauty (AONB) DPD

Further to publishing this draft Development Plan Document in late 2017 it was submitted to the Secretary of State on 28 February 2018 for examination along with all representations received during the post-publication period of 2 November 2017 to 14 December 2017. The public examination took place in June 2018 and the Inspector considered that some modifications were required in order to find the DPD sound. The consultation period for these modifications ended on 6 December and the final report and conclusions from the Inspector are awaited. The most relevant policies in relation to this proposal are:

AS01 – Development Strategy

AS02 – Landscape

AS11 – Camping, Caravan and Visitor Accommodation

7.0 Comment and Analysis

7.1 The main issues to be considered in the determination of this application are:

- Landscape and Visual Impact
- Impacts on ecology
- Impacts on archaeology

7.2 Landscape and Visual Impact

7.2.1 The proposed development is located within the existing caravan site which comprises a main access road, with some offshoots, and a mix of hard surfaced and grassed pitches for caravans and campervans. There are wooded areas to the south with the land more open to the north and northwest. The site is at a lower level than the adjacent highway and, given the topography, none of the caravans are visible from Lindeth Road. There are currently no public rights of way crossing the site, the nearest terminating around 360 metres to the northwest. However, it is understood that a National Coastal Path is proposed adjacent to Morecambe Bay and that this is likely to be close to the cliff, although the precise route has not been finalised. It is therefore possible that public views may be gained of the caravan site from the west.

7.2.2 The site is located within an AONB, which is afforded the highest status of protection in relation to landscape and scenic beauty, as highlighted in paragraph 172 of the NPPF. Policy DM14 sets out that, within AONBs, proposals for new static or touring sites, or the extension to existing sites will not be permitted where it is concluded that such proposals will have an adverse impact on conserving the landscape and scenic beauty of these areas. Policy DM28 relates specifically to landscape impact and sets out that proposals should, through their siting, scale, massing, materials and design seek to contribute positively to the conservation and enhancement of the protected landscape and consideration will be given to both the individual and cumulative impacts of a proposal. It goes on to say that, proposals which would have a significant adverse effect upon the character of the

landscape or which would harm the landscape quality, nature conservation interests, geodiversity interests or cultural heritage will not be permitted, and proposals within the Arnside and Silverdale Area of Outstanding Natural Beauty will be required to meet the requirements of the forthcoming Development Plan Document (DPD) for this area.

7.2.3 The Draft Arnside and Silverdale Area of Outstanding Natural Beauty (AONB) DPD has now been subject to examination and some amendments have been provided to the Secretary of State following this. The most relevant policy to this proposal is Policy AS11 in relation to camping and caravans. The amended wording, which has been subject to recent consultation, sets out:

“Within the Arnside & Silverdale AONB, development proposals:

- I. will not be permitted for new caravan, chalet, cabin or lodge style development, in order to conserve the landscape character or natural beauty of the AONB.
- II. may be supported within existing caravan or camping sites for small-scale tented camping and other low impact visitor accommodation. Proposals should be within the developed, screened footprint of an existing site, able to diversify the local offer and enhance the landscape character and natural beauty of the AONB. Proposals will be required to show no adverse impact on the capacity of road, sewerage or other infrastructure.
- III. will not be permitted for the replacement of tent or touring caravan pitches or other low impact accommodation with static caravans, chalets, cabins or lodges.

Redevelopment proposals within the developed footprint of an existing caravan site will only be permitted when submitted as master-planned improvements for the whole site, and which shall:

- IV. be of a scale and design appropriate to the locality;
- V. not have an adverse impact (individually or cumulatively) on the countryside or coast, in terms of landscape character and visual amenity;
- VI. be capable of being effectively screened by existing landform, trees or planting. Additional effective landscaping may be needed to supplement existing landscaping;
- VII. not have an adverse impact on surrounding residential amenity;
- VIII. 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
- IX. not give rise to any adverse impact on sewerage infrastructure;
- X. protect and enhance biodiversity assets;
- XI. provide demonstrable net gains to the special qualities of the AONB through enhancements to its landscape character and natural beauty;
- XII. be constructed of appropriate external materials and colours that are sympathetic to its locality;
- XIII. demonstrate the delivery of tangible local economic benefits;
- XIV. not introduce inappropriate levels of use to the location; and
- XV. control winter storage and the opening period

Exceptions and permissions for incremental changes or additions to or intensification of camping and caravan sites will not be allowed on the basis of any incidental or unapproved uses of the site including for camping or storage, including the storage of caravans.”

7.2.4 Given that the DPD is at a progressed stage, the policies can be afforded a significant amount of weight. The current application does not constitute a whole redevelopment of the site, given that it maintains the existing layout, although it does propose additional development in some areas so policy AS11 would be relevant. However, it is considered that a comprehensive master plan would be excessive for this scheme. The submitted information comprises existing and proposed site plans, in addition to a justification for the proposed works.

7.2.5 The application proposes to formalise all of the existing 37 grass pitches on the site with hardstanding. Twenty of these are located at the north of the site where there is the most variation in levels, with the land rising significantly from the fields to the west. 3 are towards the centre of site in a raised area, 10 are within the wooded area to the south west, and 4 are at the eastern end of the site. The scheme also includes additional access tracks to all the pitches at the north, to all those fronting onto the access road which runs north to south through the site, across a large grassed area towards the west and within the wooded area. The submission sets out that there are difficulties for vehicular access on the site during and after heavy rainfall, and many areas are barely accessible to

cars towing caravans and motor homes. It goes on to say that the applicant has lost business due to patrons refusing to drive onto affected areas, and some have been required to be pulled out by a tractor. It has been highlighted that the application is vital to the viability and effective operation of the site, especially with competition from other caravan sites in the area which have hardstanding and access to all pitches. The submission sets out that consideration has been given to providing mesh ground cover, but usage has provided poor reviews as to efficiency.

- 7.2.6 The current scheme proposes a significant amount of hardstanding which would alter the existing green and open character and appearance of the site. It is considered that these works are excessive and improvements could be made in order to help the operation of the site which would involve less intervention. In particular, there are concerns regarding works to the northeast corner of the site which is elevated and prominent within the landscape. Some of the proposed tracks seem to be unnecessary, as two rows of caravans could share one track where this is considered to be justified, and some are only relatively short but collectively would erode the character of the site. The pitches and track within the wooded area would be well screened, though there are concerns with regards to the impact on the ancient woodland, Biological Heritage Site and limestone pavement order, which will be discussed in a separate section below. However, it is recognised that, at present, there are no public views of the site.
- 7.2.7 The concerns have been raised with the agent and, whilst no formal amendments have been made as yet, some details have been provided in relation to how the scheme can be altered in order to address the concerns raised. All the proposed hardstanding area would be removed from the wooded area at the southwest of the site. The 9 pitches towards the north east corner would be retained as grass but a single track would still be proposed to serve these. The agent has set out that the applicant has spoken to the season pitch holders, and the general consensus is that they would be willing to forgo the installation of hard standings but the provision of a roadway between the two tiers is essential to allow movement of vehicles. This is considered to be a reasonable compromise which should help the operation of the site whilst not having a significant adverse impact on the character or appearance of the landscape. Another 2 elevated pitches towards the centre of the site are also proposed to be retained as grass. With these amendments, the number of additional hardstanding pitches would be reduced to 16.
- 7.2.8 The only other proposed change is the removal of some of the smaller tracks to pitches at the west of the site. This would still leave very large areas of hardstanding, to the northwest corner, and within a very open and green area to the west. In relation to the pitches in the northwest corner, the agent has set out that this area is perhaps the most crucial in terms of accessibility and patrons have refused to use this area in wet conditions. The lower 3 rows of pitches are used for short stays and, in order to facilitate the functionality of these pitches, it is necessary to provide roadways to the front and rear of the hard standings. It has also been advised that the track to service the pitches to the west of the site are also considered to be essential, with the exception of the relatively small change, and the connecting strips between existing roadways and pitches are necessary for traction of towing vehicles when siting a van and on departure. It is still considered that the amount of hardstanding could be lessened to help retain the open nature of the site which has much of the character of the surrounding landscape to the north and west. The agent has also been asked to provide improvements to the site, possibly through landscaping along boundaries, to help mitigate the works and provide general enhancements as required by policy AS11. However, no details have been provided in relation to this.
- 7.2.9 Concerns have been raised, notably from Natural England, regarding the lack of assessment of the potential impacts of the proposal on the AONB. A brief assessment of the visual impacts has been included within the submission. It sets out that the development would have no harmful impact on the immediate surrounding or wider vista and that there are no public footpaths within the land controlled by the applicant and the contours of the land and stone walls obscure any ground level development. Whilst this is brief, from a visit to the site, it is considered that a formal landscape and visual impact assessment is not required in order to fully assess the impacts on the AONB. As already set out above, there are currently no public views of the site as views from the nearest public footpath and the highway are screened by the landform. In terms of the landscape character, the site does still retain some characteristics of the surrounding landscape, including its openness. However, the site is wholly within the confines of the defined caravan site and, as such, the character of this part of the landscape has already been altered by the presence of the caravans. In addition, there are no restrictions limiting the months of the year when the site can be occupied.

7.2.10 It is considered that the proposed amendments put forward by the agent go some way to addressing the concerns regarding the impact on the openness of the site and the character of the landscape. However, it is considered that this impact could be lessened further and the agent has been asked to provide further reductions in the hardstanding, in addition to proposing improvements to the site in order to enhance the character and possibly biodiversity. It is considered that areas of hardstanding could be supported in order to help the operation of the site, which does have issues with drainage, particularly in the lower areas. The reduced number of pitches proposed is considered to be acceptable, given the contained nature of the lower areas of the site in particular. If the number of tracks can be lessened to help retain the site's overall character, then it is considered that the proposal would not have a significant visual impact within the landscape. Amended plans and any further information will be reported at the Planning Committee meeting.

7.3 Impacts on ecology and tree

7.3.1 Assessment of the impacts on ecology or trees has not been submitted with the application. However, the site is an operational caravan site and the undeveloped areas are already subject to activity and movements by vehicles. Nevertheless, part of the site is within a wooded area, and is designated as an ancient woodland, Biological Heritage Site and limestone pavement area. Some pitches are quite close to trees and there would be potential for direct impacts on these. Therefore, based on the current information, it is considered that the impacts on these designations has not been fully assessed. However, as set out above, it is proposed that the scheme will be amended to remove this area. As such, it is considered that the remainder of the proposals would not have a detrimental impact to ecology or trees. Whilst there will be some loss of the grassed open area some planting around site boundaries could help to provide some biodiversity enhancements and mitigate the hardstanding.

7.4 Impacts on archaeology

7.4.1 The Lancashire Archaeological Advisory Service has advised that Gibraltar Farm was included in a rapid assessment survey undertaken by the then Lancaster University Archaeological Unit in 1993. Two cairns were identified on the boundaries of the field and have been entered into the Lancashire Historic Environment Record (HER). One of these is located on the western boundary of the application site and is described as:

"A large, sub-circular cairn, measuring approximately 9m across and standing 1m high. A stone wall boundary and hedge run over the top of the cairn and therefore post-dates the cairn. On the top of the cairn is a small shallow depression. This feature is probably a clearance cairn."

The second cairn is located towards the north east corner of the caravan site and is described as:

"A large oval stone clearance cairn, measuring approximately 9m in length and standing to 1.2m. The cairn has little turf cover but is overlain by a mature hedge showing that the cairn predates the present field boundary".

7.4.2 The response goes on to say that the identification of these cairns as 'clearance cairns' will have been done visually and that no excavation will have been undertaken. It is therefore possible that they are burial cairns which have been subject to later 'dumping' of field clearance stones. The field boundaries stated to cross the cairns are extant on the OS 1848 mapping and the proposal field and those surrounding it is classified as 'Ancient Enclosure' in the Lancashire Historic Landscape Characterisation. This part of the county is known to have been settled in the middle prehistoric period. A settlement site at Storrs Moss (around 2.6km to the northeast) was dated to c.3500BC and the large monument of Warton Crag hillfort demonstrates a significant and organised population in later prehistoric times. It is therefore possible that the cairns at Gibraltar Farm could have been early burial cairns or, even if they are clearance cairns, that they originated at some time from the mid-prehistoric onwards.

7.4.3 From the information provided by the agent, the origin of the mound is not clear. However, the Lancashire Archaeological Advisory Service has advised that as the mound is not an existing pitch and its removal would require considerably more than the 200mm excavations indicated on the supplied plans, they would be satisfied if a plan was supplied showing that it will not be disturbed. If this is not confirmed then formal archaeological works would be required. An update will be provided

at the meeting.

8.0 Planning Obligations

8.1 There are no obligations to consider as part of this proposal.

9.0 Conclusions

9.1 Given the location of the site and the nature of the proposal, it is considered that there will not be a significant impact on the character or appearance of the protected landscape, provided that appropriate amendments are made to reduce the number of tracks and the number of surfaced pitches to 16, in addition to enhancements to the site, which would benefit the landscape and biodiversity. Subject to the removal of the area within the ancient woodland, there should not be a detrimental impact on biodiversity or trees. It should also be acknowledged that the Arnside & Silverdale AONB is a popular tourist and visitor destination, with a well-developed range of camping, caravan and visitor accommodation which brings many economic benefits to the area, which must be carefully balanced against the landscape character and natural beauty of the AONB. Overall it is considered that the proposal would comply with both local and national planning policy, subject to the amendments discussed above.

Recommendation

That Planning Permission **BE GRANTED** subject to the receipt of acceptable amended plan and the following conditions:

1. Standard three year timescale
2. In accordance with amended plans
4. Surfacing
5. Landscaping
6. Avoidance of mound or archaeological investigation

Article 35, Town and Country Planning (Development Management Procedure) (England) Order 2015

In accordance with the above legislation, the City Council can confirm the following:

Lancaster City Council has made the recommendation in a positive and proactive way to foster the delivery of sustainable development, working proactively with the applicant to secure development that improves the economic, social and environmental conditions of the area. The recommendation has been taken having had regard to the impact of development, and in particular to the relevant policies contained in the Development Plan, as presented in full in the report, and to all relevant material planning considerations, including the National Planning Policy Framework, National Planning Practice Guidance and relevant Supplementary Planning Documents/ Guidance.

Background Papers

The plan appended to the 2013 legal agreement for Gibraltar Farm camp site