



Sandy Bay Caravan Park 119 Pilling Lane Preesall FY6 0HG

Extension of the existing caravan park by 31 no. units.

PLANNING STATEMENT

June 2021



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/1 INTRODUCTION

- 1.1. PWA Planning are retained by Sandy Bay Caravan Park ('the Applicant') to progress a full planning application for the extension of an existing caravan park to allow for the placement of 31 no. additional plots ('the proposed development') at Sandy Bay Caravan Park, 119 Pilling Lane, Preesall, Poulton-le-Fylde, FY6 0HG ('the application site'). The planning application is made to Wyre Borough Council ('the Council') and relates to the red edge application site boundary defined on the Site Location Plan (drawing reference: 20/119/L01). It is submitted following a recent boom in interest in the site from new customers as more people look to holiday in England as a result of the COVID-19 pandemic.
- 1.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. This Planning Statement will demonstrate that the proposals accord with the provisions of the relevant policies of the Development Plan, and moreover that there are other significant material considerations which indicate that planning permission ought to be granted. In addition, the statement will seek to demonstrate that there are no technical reasons which could hinder the grant of planning permission.
- 1.3. This statement should be read in conjunction with the submitted application package, which includes the following documents:
 - 1APP Form;
 - Flood Risk Assessment including Sequential Test, Exception Test, Specific Warning and Evacuation Plan and Drainage Scheme;
 - Tree Survey and Arboricultural Impacts Assessment;
 - Viability Assessment
 - Drawings:
 - Location Plan (drawing reference: 20/119/L01);

- Existing Site Layout Plan (drawing reference: 20/119/E01);
- Proposed Site Layout Plan (drawing reference: 20/119/P01);
- Proposed Construction Phasing Layout (drawing reference: 20/119/P02);
- Ardennes Example Floor Plan;
- Ardennes Elevation Example;
- Burgundy Example Floor Plan;
- Burgundy Elevation Example;
- Cowarth Example Floor Plan; and
- Cowarth Elevation Example;

/2 SITE DESCRIPTION

- 2.1. The site subject to this application is known as 'Sandy Bay Caravan Park', which is an existing holiday caravan park. It is approximately 2.37ha in size and located off Pilling Lane, a short distance to the east of the centre of Knott End-on-Sea and to the north of Preesall, with the site lying within the Preesall ward of Wyre Borough Council. None of the caravans which occupy the site are used as a main residence.
- 2.2. A Location Plan showing the site within its immediate setting is submitted with this planning application (drawing reference: 20/119/L01). The site within its context can also be seen in Figure 1 below, which illustrates that the land is part of a cluster of existing built development, and it is not isolated within the landscape.



Figure 1 - Image of the Site's Surrounds (Source: Google Earth).

- 2.3. Preesall Sands and the Lune Estuary lie beyond the seawall to the site's northern boundaries, while residential properties and open land exist to the east of the site. To

the west of the site is the rear garden areas of 87 and 91 Pilling Lane, beyond which lie multiple caravan parks, including Rose Grove and Boothfield House sites. To the south of the site are residential properties which front onto Pilling Lane.

- 2.4. At present, the site is predominately occupied by caravans and their associated infrastructure, which includes access roads and hook-up facilities to gas/electric, which service each plot. Moreover, the site also contains an on-site laundrette for users of the site and features gated access to the seawall. Currently, much of the western portion of the site is undeveloped land, which forms part of the caravan park, but serves no particular function.
- 2.5. Access into the site is taken off Pilling Lane from the south east. The access road runs internally through the site, allowing for convenient and direct access to each of the caravan plots for all vehicular users of the local highway network.
- 2.6. The site contains tree/hedgerow coverage on all sides, which helps to define the boundaries of Sandy Bay Caravan Park, while also reducing potential views into the site; therefore, improving privacy across the caravan park.
- 2.7. Knott End-on-Sea is located a short walk to the east, and benefits from a good range of local amenities, including a public house, a convenience store, multiple cafés, a post office, and a church amongst others. The site is served by regular public transport connections, with the Rosslyn Avenue located 55m to the south west of the site off Pilling Lane, providing services to nearby local villages and towns such as Preesall, Knott End-on-Sea, Pilling, Galgate, and Garstang amongst others.
- 2.8. In terms of designations, the site lies within the Countryside, under Policy SP4 of the adopted Wyre Local Plan. The site lies wholly within Flood Zone 3 but benefits from flood defences. The site is not within a Mineral Safeguarding Area, nor does it contain any listed buildings.

- 2.9. Public Right of Way (PRoW) 2-3 FP 18 lies to the east of the site and loops round northernly along the boundary and sea wall. The Lune Estuary SSSI is located beyond the site's northern boundary. There are no TPO's affecting the site.

/3 PLANNING HISTORY

3.1. A search of Wyre Borough Council's planning register was carried out to understand the site's planning history, with multiple formal planning applications identified below:

- **82/01264:** *Proposed improvements and alterations to existing caravan park. Extension of park including 16 additional units. Provision of bowling green and parking area. Use of additional access from Pilling Lane. Refused 1st December 1982.*
- **83/00436:** *Proposed improvements and alterations to existing caravan park. Refused 9th November 1983.*
- **98/00155:** *Variation of condition to extend site use from 1st March to 4th January. Withdrawn 19th March 1998.*
- **02/00933/FUL:** *Extension to Site and Resiting Of Static Holiday Caravans. Refused 9th January 2003.*
- **03/00086/FUL:** *Resubmission of Planning Application 02/02/00933 For Change Of Use Of Recreational Area To Resite Nine Static Holiday Caravans, Including Landscaping. Approved 3rd September 2003.*
- **19/01256/LAWE:** *Lawful development certificate for the siting of an existing holiday static caravan. Approved 29th May 2020.*

3.2. Other applications of relevance exist within proximity to the site, with these documented below.

- **10/00852/FULMAJ:** *Proposed siting of 24 additional static holiday caravans within the existing approved confines of Midwood Caravan Park to make 70 in*

total. Midwood Caravan Park Head Dyke Lane Pilling Lancashire PR3 6SD.

Approved 4th February 2011

- **11/00244/FUL:** *Application for removal of condition 1 of Planning Application 02/00/00463 to allow the site to be occupied as holiday use for 12 months of the year. Fold House Caravan Park Ltd Head Dyke Lane Pilling Preston Lancashire PR3 6SJ. Approved 3rd June 2011.*
- **19/00254/FUL:** *Siting of 11 additional static holiday caravans. Sunset Park, Sower Carr Lane, Hambleton, Poulton-Le-Fylde, Lancashire, FY6 9EQ. Approved 24th July 2019.*

3.3. Most importantly, the planning history on the site and within similar sites across Wyre Borough Council, illustrates that the extension of existing and established caravan parks, including those within Flood Zone 3 and Countryside Areas, are acceptable, whereby they address growing demands, as identified by the applicants. This must be attributed significant material weight in the determination of other applications relating to the site.

3.4. It is pertinent to note that Condition number 2, attached to planning permission reference: 03/00086/FUL states that "*Landscaping and screening shall be provided, retained and maintained in accordance with a scheme and programme which shall be submitted to, and approved by, the Local Planning Authority prior to commencement of development. The scheme and programme shall thereafter be varied only in accordance with proposals submitted to and approved by the Local Planning Authority and such variations shall be deemed to be incorporated in the approved scheme and programme. Any trees removed, dying, being severely damaged or becoming seriously diseased within 5 years of planting shall be replaced by trees of similar size and species to those originally required to be planted.*"

/4 PROPOSED DEVELOPMENT

- 4.1. Full planning permission is sought for the extension of the existing caravan park at Sandy Bay Caravan Park, 119 Pilling Lane, Preesall, FY6 0HG, to allow for the siting of a further 31 no. plots for holiday use.
- 4.2. Over the past 12 months there has been a clear and sharp increase in demand for holiday homes, which includes static caravans, given the restrictions placed upon international travel, as a result of COVID-19. Knott End-on-Sea is an attractive place for holidaying or 'staycations', given its location upon the coast, with the site boasting convenient access to the sea wall. Knott End-on-Sea is also located conveniently close to the seaside resorts of Fleetwood, Blackpool, and Thornton-on-Cleveleys. The expansion of the Sandy Bay Caravan Park represents an opportunity to help boost the local economy through increased visitors at a site that is established, and well related to the urban area and town centre.
- 4.3. At present the site contains 57 no. caravans, with a large portion of land to the west being unoccupied. To make more efficient use of this space, this is where the new caravans will be situated. The proposed development will extend the existing caravan park by 31 no. new caravans. As part of the proposed development, Plots A and B will be relocated on the site, while Plots C and D will be reorientated to improve the layout of the site and facilitate the development, as shown on the Proposed Site Plan (drawing ref. 20/119/P01).
- 4.4. The proposed development will consist of six phases, ensuring that the proposed caravans are built at a steady rate, therefore reducing potential deliveries to and from the site, meaning that the local highway network will not be negatively impacted. The Proposed Construction Phasing Layout (drawing reference: 20/119/P02) is provided as part of this application, which evidences the order in which plots across the site will be erected. Phase 1 will include Plots 15-20, Phase 2 Plots 9-14, Phase 3 Plots 2-8, Phase 4 Plots 21-24, Phase 5 Plots 25-28, and Phase 6 Plot 1 and Plots 29-33.

- 4.5. Access into the site will remain as existing, with the internal roads extended to the proposed units, to ensure safe and convenient access within and around the site. Turning heads for vehicles will be implemented within the north west and south west corners of the site, to complement the existing one in the north east of the site.
- 4.6. Pedestrian access to the site will be retained off Pilling Lane, which will allow for safe connectivity to the site by foot. The design of the internal layout ensures that there is access for all types of vehicles, with the turning heads included so that all can enter and leave the site in a safe manner.
- 4.7. As detailed within the Arboricultural Impact Assessment, the development can be delivered without any requirement to remove any significant trees or groups of trees, with no root zones affected by the proposals. Any consent granted will be carried out in accordance with the recommendations of the report.
- 4.8. The application seeks consent for the services plots, as the static caravans themselves are moveable, so they do not themselves require planning permission. All of the plots as shown on the submitted site plans, will allow for the stationing of static caravans with external decking areas, which require formal planning permission for each of the proposed plots.
- 4.9. The proposed static caravan units will contain all of the essential items required, included designated sleeping areas, cooking areas, dining areas and multiple toilets. All of the proposed units will also contain an outdoor decking area as well as a private parking space for a vehicle. The internal floorplans and elevations for each unit type are submitted as part of this applications submission documents.
- 4.10. As shown on the submitted elevation drawings, the proposed units will be attractive and high-quality in their build. Each unit will have bi-folding doors which open up onto the decking area, as well as multiple uPVC framed windows which will help to illuminate the inside via sunlight. The units will all be neutrally coloured with sandstone, cream,

and white coloured units, which will predominately be composed of aluminium cladding with pre-coated steel bargeboards and uPVC gutters and downpipes.

/5 PLANNING POLICY CONTEXT

5.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that *'if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.'* Said material considerations includes any other supplementary / supporting planning documents and government guidance as set out in the National Planning Policy Framework (NPPF) (2019).

Development Plan

5.2. The Development Plan for the application site comprises of the Wyre Local Plan 2011-2031 (adopted February 2019). Key policy documents that comprise 'material considerations' include the National Planning Policy Framework (2019), National Planning Policy Guidance (NPPG), and any local supplementary planning guidance documents considered relevant to the proposal.

5.3. An image of the site's allocation within the adopted policies map is shown below by Figure 2, which evidences that the site lies within the Countryside Area (Policy SP4).

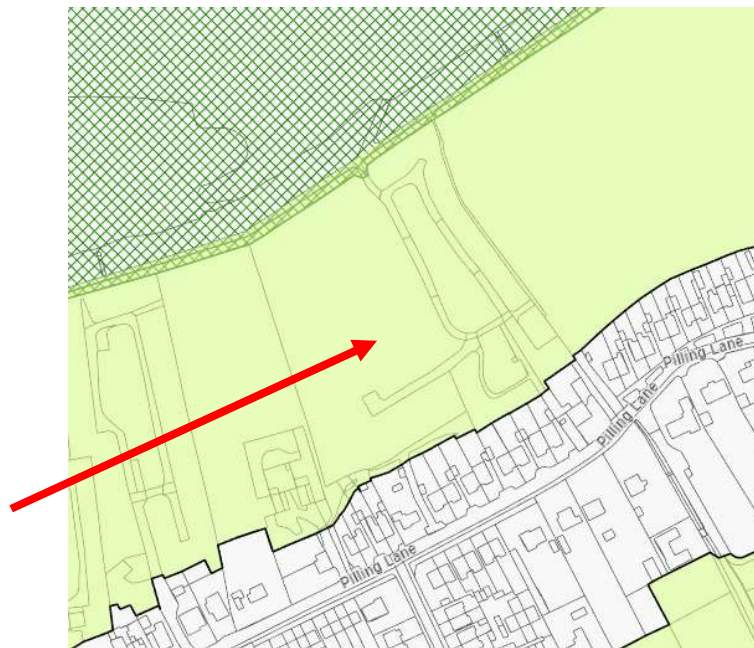


Figure 2 - Image of the Site from the Adopted Local Plan Policies Map

5.4. Figure 2 above also shows that the site falls marginally outside of the Settlement Boundary, which lies to the immediate south, classified under Policy SP1. The Lune Estuary/Preesall Sands lie to the north beyond the seawall and are classified as a Green Infrastructure Environmental Asset (Policy CDMP4).

5.5. The following policies are relevant to the determination of the application, and this is discussed further in the Material Considerations portion of the section:

- SP1 – Development Strategy
- SP2 – Sustainable Development
- SP4 – Countryside Areas
- CDMP1 – Environmental Protection
- CDMP2 – Flood Risk & Surface Water Management
- CDMP3 – Design
- CDMP4 – Environmental Assets
- CDMP6 – Accessibility & Transport
- EP8 – Rural Economy
- EP9 – Holiday Accommodation

5.6. **SP1 – Development Strategy** states that one of the overarching aims is to meet the identified needs of all sections of the community, promoting growth while minimising or eliminating net environmental impact. This will be achieved through new development, with Knott End/Preesall highlighted as a 'Rural Service Centre'.

5.7. **SP2 – Sustainable Development** this echoes the NPPF, whereby development should contribute positively to the overall physical, social, environmental, and economic character of the area in which the development is located in.

5.8. **SP4 – Countryside Areas** demonstrates that development which adversely impacts the open and rural character of the countryside will not be permitted, unless it is demonstrated that the harm is outweighed by the associated benefits. Moreover, this policy also asserts that tourism uses are appropriate within the Countryside Areas.

- 5.9. **CDMP1 – Environmental Protection** illustrates that development will be permitted where in isolation or in conjunction with other planned or committed development, if it will not lead to adverse impacts upon health, amenity, and safety.
- 5.10. **CDMP2 – Flood Risk & Surface Water Management** states that development is required to have regard to the most up-to-date Wyre Strategic Flood Risk Assessment Level 2 including the SFRA Level 2 Flood Risk Sequential Test Paper and comply with the most up to date version of any relevant plans and strategies. Additionally, development is expected to demonstrate that it will not be at an unacceptable risk of flooding, it would not increase risk of flooding elsewhere and it would not adversely affect the integrity of tidal and fluvial defences or access for essential maintenance and emergency purpose.
- 5.11. **CDMP3 – Design** requires new development to be in keeping of the surrounds and respect the character and context of the area, as well as being considerate to neighbouring properties and considering residential amenity.
- 5.12. **CDMP4 – Environmental Assets** states that development should seek to minimise or eliminate net environmental impacts.
- 5.13. **CDMP6 – Accessibility & Transport** states that development will be permitted if it meets the requirements of the Core Development Management Policies, which includes providing safe and adequate vehicular, cycle and pedestrian access to and from, and circulation within, a proposal site.
- 5.14. **EP8 – Rural Economy** shows that the Council will support proposals to help diversify the rural economy. Policy EP8 also states that the expansion of existing businesses within Countryside Areas will be supported whereby the Core Development Management Policies are met.
- 5.15. **EP9 – Holiday Accommodation** states that sites including new short stay touring caravan and camping sites, will be permitted where they meet the requirements of the

Core Development Management Policies and provided they satisfy the following criteria:

- a) *"The totality of development, including on site services, is of appropriate scale and appearance to the local landscape;*
- b) *Any new building and supporting infrastructure is necessary;*
- c) *New tourism accommodation sites incorporating new build accommodation will need to be supported by a sound business plan demonstrating long term viability; and*
- d) *Proposals for extensions to sites which include new built accommodation outside settlement boundaries will need to be supported by a viability assessment of the existing and proposed business."*

5.16. **Appendix B: Car Parking Standards** establishes the car parking requirements for different types of developments.

Material Considerations

National Planning Policy (2019)

5.17. The National Planning Policy Framework (NPPF) is a material consideration in planning decisions as per Paragraph 2 of the Framework and Section 38(6) of the Planning and Compulsory Purchase Act 2004.

5.18. The NPPF sets out Government planning policies for England and how these are expected to be applied. The NPPF sets out the Government's presumption in favour of sustainable development (Paragraph 11) whereby proposed developments which correctly balance the requirements of economic, social, and environmental issues should be granted planning permission unless there are strong reasons that permission should not be granted. The NPPF also strongly supports economic and housing development.

5.19. Sustainable development is broadly defined in Paragraph 8 of the Framework as having three overarching objectives:

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

5.20. **Paragraph 20** states that strategic policies set out an overall strategy for the pattern, scale, and quality of development, providing for the needs of all.

5.21. **Paragraph 47** details that applications must be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made swiftly, and within statutory timescales unless an extension has been agreed with the applicant in writing.

5.22. **Paragraph 80** states that decisions should create conditions in which businesses can expand and adapt. Significant weight should be placed on the need to support economic growth.

- 5.23. **Paragraph 82** indicates that planning policies and decisions should recognise and address the specific locational requirements of different sectors.
- 5.24. **Paragraph 83** asserts that decisions should enable a) sustainable growth and expansion of all types of business in rural areas and c) sustainable rural tourism and leisure developments which respect the character of the countryside and d) the retention and development of accessible local services and community facilities.
- 5.25. **Paragraph 84** illustrates that the local community and local business needs in rural areas encouraged where suitable opportunities exist.
- 5.26. **Section 9** of the NPPF seeks to encourage sustainable transport. It states that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives.
- 5.27. **Paragraph 108** clarifies that in assessing specific applications for new development, it should be ensured that appropriate opportunities to promote sustainable transport modes can be, or have been – taken up, given the type of development and its location. Later, at **Paragraph 109**, it is clarified that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 5.28. **Paragraph 124**, in relation to design, states that good design is a key aspect of sustainable development.
- 5.29. **Paragraph 170 b)** details that planning policies and decisions should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside.

/6 PLANNING POLICY ASSESSMENT

Principle of Development

- 6.1. Pertinent to establishing the principle of development at the site is the scheme's compliance with the Adopted Wyre Local Plan 2011-2031 policies. Local Plan Policy SP1 establishes the overall planning strategy for Wyre, with an overarching aim to meet the identified needs for all members of the community.
- 6.2. Policy SP1 establishes that Knott End-on-Sea/Preesall is a 'Rural Service Settlement', along with Great Eccleston, Hambleton, and Catterall. Such areas are considered to be sustainable settlements, whereby growth and development is required to meet identified local demands.
- 6.3. In this instance, the site is located marginally outside of the defined settlement boundary, but clearly has a strong functional relationship with both nearby Knott End-on-Sea and Preesall, given that the access into the site lies within the defined settlement boundary. The Council's recognition of Knott End/Preesall as a 'Rural Service Centre' confirms that the village currently benefits from a good provision of local amenities, services and has good access to public transport. As such, future holidaymakers will positively contribute to the underpinning of nearby local services, such as shops and cafés, helping to form part of a sustainable rural community. Indeed, a direct link to services within the centre exist a short and pleasant walk along the adjacent sea wall.
- 6.4. Further to this, Sandy Bay already has an established usage as a holiday park, with a total of 57no. caravans currently occupying the site; therefore, the principle for this type of usage on the site has already been established. Moreover, the site has received formal planning consent for an extension of the site in the past, while multiple other existing caravan parks, which also lie wholly within Flood Zone 3, have had extensions permitted, as documented within Section 3 of this document. Henceforth, it can be put forward that the Council are generally supportive of extensions to existing caravan

sites, given the economic benefits which said schemes bring forth, if such sites do not detrimentally impact their surrounds.

- 6.5. The proposed development is deemed to accord with Policy SP2, which aims to create sustainable communities within the borough, by securing economic, social, and environmental gains. The proposed development will bring forward an underutilised portion of an existing caravan park into use, providing high-quality caravans to meet growing demands. The proposals are located within a sustainable location, close to local amenities and the existing public transport network, in accordance with Policy SP2.
- 6.6. The site is located within a Countryside Area, marginally outside of the defined settlement boundary under Policy SP4. Whilst the proposals create a degree of conflict with Policy SP4, this is outweighed by Policy EP9(d), which states that extensions to existing holiday accommodation sites outside of settlement boundaries will be supported, whereby they contain a viability assessment of the existing and proposed business. Moreover, the Government's aim to promote economic growth, which is the first pillar to achieving sustainable development (NPPF Paragraph 8), also weighs in favour of the proposed expansion of the holiday park. The expansion will help to build a strong rural economy, which will be responding to the increased need for such accommodation, as identified by the applicant, evidenced by the viability information that is supplied as part of this application, which clearly shows a growing demand for this type of development within the local area.
- 6.7. The proposed development has been designed in a way to minimise the impact upon the visual amenities and aesthetic value of the surrounding countryside, utilising a vacant parcel of land, which at present offers little value. As aforementioned, the site is well contained on all sides by existing vegetation, which helps to minimise any perceived visual harm of the site, respecting nearby residential amenity. The proposals also involve the strategic reorientation of multiple caravans, which provides a betterment in terms of the existing layout, while also utilising the available space more efficiently.

- 6.8. Policy EP9(d) explains that proposals for extensions to existing caravan parks outside of the settlement boundaries will need to be supported by a viability assessment of the existing and proposed business, while they too will need to be of an appropriate scale and should not negatively impact the landscape. As part of this planning application, viability information has been submitted, which demonstrates the need for the extension to the existing caravan park, to meet the needs identified by the applicant. During the ongoing Covid-19 pandemic and Brexit, there has been a 'boom' in the 'staycation' market, given the restrictions places upon international travel. Henceforth, the applicant intends to capitalise on said growth in the market, and meet the identified demands, by extending the site within the existing boundaries, to meet the identified growing demand, which is wholly consistent with Policy EP9.
- 6.9. The approved planning applications on the site itself as well as elsewhere within Wyre Borough Council's boundaries, documented within Section 3 of this planning statement, establishes a clear precedent that extensions to existing caravan parks can be deemed acceptable. Of most relevance is planning application 19/00254/FUL at the Sunset Park Holiday Village, as this application was judged against the existing adopted Local Development Plan for the Borough. It was for an extension to an established caravan park, which too lies within Flood Zone 3 and the Countryside Areas.
- 6.10. The 19/00254/FUL application was deemed favourable, with the new caravans determined to have *"little impact to the wider character of the area as they are set within the park confines and views from outside the site will be limited"* while the impact internally was deemed to be acceptable. This application was also deemed to have no impact upon residential amenity, due to distances between existing properties, with the proposed extension at Sandy Bay caravan having greater separation distances between the nearby residential properties, compared to the Sunset Park Holiday Village; this is consistent with Policy CDMP3.
- 6.11. Furthermore, as the proposed extension to the Sunset Park site was within the defined physical boundaries of the site, similar to the Sandy Bay site, there was judged to be no impact upon ecology or trees, while there too was no contamination issues.

Moreover, this site was deemed acceptable regarding highways/parking matters, with no objection raised by LCC Highways on safety grounds, consistent with Policy CDMP6.

- 6.12. Finally, the LPA also concludes within the delegated report that the proposed development at Sunset Park satisfied the parameters of the sequential test. The report confirms that the disaggregation of the site would have been *"unreasonable"* given that it is an established site, like the proposed development at Sandy Bay, while the relocation of the site would lead to issues elsewhere, such as detrimentally impacting the landscape. Further to this, the business plan which was submitted in support of the 19/00254/FUL application was determined to satisfy part 1 of the exceptions test, while the flood risk assessment submitted in support of the 19/00254/FUL application was deemed to satisfy part 2 of the exceptions test, in line with CDMP2.
- 6.13. The proposed development at Sandy Bay Caravan Park, for the extension of the existing caravan park clearly is very similar to the 19/00254/FUL application, which establishes that the LPA should also deem the proposals as acceptable.
- 6.14. Paragraph 170 b) of the NPPF requires planning policies and decisions to recognise the intrinsic character and beauty of the countryside. Nonetheless, the proposed development is for the extension of an existing site, so there are not considered to be any further impacts regarding contamination, trees, ecology, or highways. Moreover, the significant economic benefits which will be generated as a result of the expansion, further help to mitigate against any potential conflicts with Paragraph 170 b) of the NPPF, which is ultimately within the spirit of Local Plan Policy SP2, as well as the Development Plan for Wyre Council and the NPPF, when taken as a whole.

Environment and Trees

- 6.15. Policy CDMP1 of the adopted Local Plan states that the environment should be protected, and whereby possible, enhanced. The site at present has little ecological value, with it constituting of a vacant portion of land which forms part of the existing caravan park. Moreover, the layout of the scheme has been carefully designed to

ensure that none of the existing shrubbery, trees, and hedgerows which occupy the boundaries of the site are not harmed by the proposed extension. Accordingly, the proposals are consistent with the requirements established by Policy CDMP1 and Policy CDMP4 of the adopted Local Plan.

Flood Risk and Drainage

- 6.16. Policy CDPM2 illustrates that development is required to have regard to the most recent Wyre Strategic Flood Risk Assessment Level 2. Development located within an area that is at risk of flooding must demonstrate that the Sequential Test and Exceptions Test have been applied to evidence that there are no reasonable alternative sites at lower risk, considering the nature of flooding and the vulnerability of the development.
- 6.17. Moreover, the planning application is supported by a Flood Risk Assessment including Sequential Test, Exceptions Test, Specific Warning and Evacuation Plan and Drainage Scheme, which confirms how the flood map categorises the site as being located within Flood Zone 3 or having a 'high probability' of fluvial/ tidal flooding. However, Level 2 of the Council's Strategic Flood Risk Assessment (SFRA) notes that "*where a site is already benefitting from defences, residual flood risks should be addressed including risk of defence breaching, overtopping or pump failure.*"
- 6.18. To assess the safety of the site three separate flood models have been reviewed. These being the site-specific Environment Agency (EA) model data which includes SLR allowances, the EA's climate change allowances from 2016 and the modelled maps from the SFRA Level 2. The site specific EA model could be summarised as the holiday homes located within the East and South of the proposed redevelopment area would be below the recommended FFL of 6.2m. However, all of the redevelopment site is located above the modelled flood level (the tidal defended plus Climate Change allowance of 970mm SLR level) of 5.6m.
- 6.19. As well as the modelled SLR data that was provided for the site, the EA also provide Climate Change allowances for the various regions/ river basins. It is likely that as the

site is a commercial business rather than a residential dwelling that it will not be operational for all four epochs provided by the EA (covering 125 years).

- 6.20. The report details that based on these calculations for the 70th percentile or 70% allowance the whole of the proposed redevelopment area would be above the 5.797m level. Based on the 95th percentile or 95% allowance majority of the redevelopment area would be above the 5.917m level, although the new holiday homes to the South of the area would not be above this level.
- 6.21. The modelled flood maps in the SFRA suggest that for the undefended scenarios considered the site would be at risk of flooding. However, the defended modelled scenarios considered the site would be at a much-reduced risk of flooding. The breach scenarios suggests that in the event of the breach of the existing flood defences would result in flooding levels below the FFL of the holiday homes but could result in levels that would cause vehicles to move. The site is in an area which benefits from flood defences.
- 6.22. A Specific Flood Warning and Evacuation Plan is nevertheless provided at Appendix 5 of the report. This includes information relating to the various EA flood alert stages and the actions required by the business/ community at each stage. Plus, details of the evacuation plan. The document includes a plan of the safe egress route off the site, and also the safe egress route to a location within Flood Zone 1 (3 minute drive from the site).
- 6.23. The proposed SuDS scheme will ensure that no surface water from the new holiday homes and associated access roads will discharge to the combined sewer.
- 6.24. The report finally provides a Sequential Test and Exceptions Test. The former concludes that because the application relates to the expansion of an existing business, that an alternative location that is at lesser risk is not reasonably available. The Exceptions Test is also passed based upon the contribution of the site to the local

economy, including the vitality and viability of Knott End and due to the site being safe from flooding.

- 6.25. Additionally, the applicants are aware of a similar proposal for the expansion of a static holiday caravan site at Sunset Park, Sower Carr Lane, Hambleton (Ref: 19/00254), which was also identified as being located within Flood Zone 3. In approving planning permission in July 2019, Wyre Borough Council concluded that the disaggregation of that site was unreasonable, and no further testing was required to study the potential of alternative sites as a more preferable location for the proposed development. This would support the above view taken by the flood risk consultants.
- 6.26. Taking the above matters into account, the proposal is deemed compliant with requirements set regarding flood risk and drainage within the Development Plan and the NPPF.

Highways

- 6.27. Policy CDMP6 relates to accessibility and highways, stating that developments must provide safe and adequate vehicular, cycle and pedestrian access to and from, and circulation within, a proposal site. Similarly, Paragraphs 108 and 109 of the NPPF asserts that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 6.28. The existing vehicular access point into the site, which is in the south east of the site, connects to Pilling Lane to the south of the site, and is deemed to provide a safe point of entry into the site, with clear visibility splays. Moreover, the extension to the existing internal roads is also deemed to be appropriate for the proposed development, providing safe and convenient ingress and egress to the caravans for all users of the site.

- 6.29. The location of the site is considered sustainable in the context of the NPPF given its location within walking and cycling distance of Knott End-on-Sea and Preesall and has good links to public transport. This will promote sustainable travel and reduces the need to travel significant distances via private vehicles. The site is located approximately 55m to the north east of the nearest bus stop at Rosslyn Avenue off Pilling Lane, which offers services into nearby settlements, including Preesall, Knott End-on-Sea, Pilling, Galgate, and Garstang amongst others. The site is therefore in accordance with Local Plan Policy CDMP6.
- 6.30. Sufficient parking is available to support the development, with each caravan containing one dedicated parking space which adjoins the caravan. Parking is therefore considered to accord with the requirements of the Parking Standards highlighted within the Local Plan Appendix B.
- 6.31. The proposed development will consist of six individual stages, as discussed within Section 4 of this document. Phasing the development will ensure that the plots are developed at a steady rate, instead of all of the proposed units being developed at the same time. Developing the site in a phased manner will ensure to mitigate against any potential impacts upon the local highway network, through the delivery of materials etc.

Sustainable Development

- 6.32. Considering the Framework as a whole, it is important to note that Paragraph 7 of the NPPF is clear that the purpose of the planning system is to contribute to the achievement of sustainable development. At Paragraph 8 it states that: "*Achieving sustainable development means that the planning system has three overarching objectives which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)*".

- 6.33. In terms of economic benefits, it is considered more than likely that during construction, the development would contribute to the local economy directly through the employment of local companies to facilitate the erection of the caravans and the internal roads, and the local supply chain through the provision of materials. Once functional, the customers will use and support the growth of local services, including nearby shops, restaurants, and cafés, as well as other services, promoting a sustainable rural economy. It is considered that the proposed development would therefore assist in achieving the economic aims of sustainable development.
- 6.34. The social aspect of sustainability is met as the proposal will create high-quality caravans for tourists and comprises a use which has already been established upon the site itself and within the surrounds. The proposed scheme will serve as a betterment to the site, with a more efficient usage of space and an overall betterment in terms of the layout. The development also not compromising upon neighbouring residential amenity, with no greater impact than the existing. By virtue of the proximity to Knott End-on-Sea and Preesall, future customers will help to underpin part of a sustainable rural community.
- 6.35. Turning to the environmental aspect of sustainability, the site at present offers very little in terms of ecological value, with the proposed development retaining the existing hedgerows, shrubs, and trees which occupy the boundaries of the site. The location is such that future residents will have access a range of services and facilities by public transport, which is in line with national and local policies.

Viability Assessment

- 6.36. Policy EP9 of the adopted Local Plan seeks to support new tourism accommodation within the borough, provided that such proposals are supported by a sound business plan which demonstrates long-term viability. A viability assessment is submitted as part of this planning application, which adequately satisfied the criterion of Policy EP9.

The Planning Balance

- 6.37. Overall, it is considered that the development is consistent with both the Development Plan and NPPF. The business plan submitted in support of this application further justifies the need for an on-site extension of the caravan park, to meet the identified need. As aforementioned, the restrictions placed upon international travel, which are a result of COVID-19, have led to a boom in the 'staycation' holiday market. Paragraph 8(a) of the NPPF asserts that economies should be responsive, and the proposed extension will capitalise upon the market growth, through the appropriate extension of an existing holiday park. Accordingly, the proposed development should be afforded significant weight, given the associated economic, social, and environmental benefits that this will bring forward locally. On the above basis, planning permission should be approved.

/7 CONCLUSION

- 7.1. PWA Planning are retained by Sandy Bay Caravan Park to progress a full planning application for the extension of the existing caravan park to provide 31no. of additional plots. at Sandy Bay Caravan Park, 119 Pilling Lane, Preesall, Poulton-le-Fylde, FY6 0HG.
- 7.2. The proposed development will result in several key benefits which are deemed relevant to the determination of the application as it is considered that these are awarded significant weight in the planning balance. These include but are not limited to: -
- The appropriate expansion of an existing caravan site, in line with the applicant's identified needs;
 - Utilisation of a portion of the land which currently serves no functional purpose;
 - New caravans within a sustainable location, where future visitors will frequent the nearby local services without relying upon the use of the car;
 - Significant contributions to the local economy and local spending power; and
 - The employment of contractors and businesses to erect the proposed units.
- 7.3. Additionally, it is demonstrated through the submission of relevant plans and reports that all technical matters have been fully considered and would not prevent the development from being delivered.
- 7.4. On the above basis, the proposals represent a form of sustainable development which is consistent with adopted planning policy and should therefore be approved.



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