

Planning, Design and Access Statement

Infilling the existing holiday park with up to 17 additional holiday lodges,
together with associated works on:

Tregoad Holiday Park, St Martin, Looe, Cornwall PL13 1PB

Applicant:

Tregoad Holiday Park Ltd

Prepared by

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1 Introduction

- 1.1 Tregoad Holiday Park is now flourishing under new ownership. The Applicant is continuing to make a substantial investment into the holiday park taking into consideration the established planning consents.
- 1.2 The holiday park benefits from a great number of planning consents, with perhaps the first significant permission dating back to 1980, granting the siting of 150 caravans in part of the main site area. In 2005 consent was granted in the main site area for, *inter alia*, 190 caravans, 25 camping pitches, storage for 100 caravans and 12-month uses. These consents were implemented.
- 1.3 Consent was granted on 16th October 2014 (under PA14/04703) for 106 static caravans and associated works on the main site area. The pre-commencement and pre-use conditions have been discharged. This consent was commenced by the former owners but was at an early phase of development when the holiday park was acquired. Subsequent Non-Material Amendments have been approved to revise the approved layout design.
- 1.4 Permission PA17/05024 was granted on 30th August 2017 for 80 static caravans and associated works on an extended area around the main park, part of which had been used for camping for a long period. The pre-commencement conditions for that consent have been discharged. This adjoining development has commenced. A non-material amendment has been submitted concurrent with this application in order to regularise a modest change to the layout, accommodating a more accessible return loop for the estate road.
- 1.5 The Applicant's investment programme is now well under way, which will be of significant benefit to the local economy, not only in terms of the existing employees, but also with regard to the wider community, including local contractors and suppliers during the construction phases and related economic growth in the local area as the tourism offer at the holiday park is improved.
- 1.6 In order to continue this investment, the Applicant has carried out extensive investigations with regard to the works necessary to implement the approved development, referenced as associated development in the most recent consents. These infrastructure works include upgrading the electricity supply and connections to and throughout the holiday park, and improvements to drainage and water supply.
- 1.7 The new owners' desire to provide high quality amenity provision and facilities for its guests continues via the recent planning consent for the installation of a new all-weather swimming pool, together with associated works. The result will be a substantial net improvement to the holiday park, improving the offer to tourists with a wider benefit to the local economy as a corollary.
- 1.8 The infrastructure works to support the approved development have now reached an advanced stage, with Western Power having co-designed the new power arrangements for the holiday park and most of the upgrade work now completed. One of the required changes was for a new high voltage connection to be supplied to the site on the periphery, with a low voltage intake connection and below-ground cabling sited within the development. These infrastructure improvements removed most of the overground power lines within the site but required a buffer for the implementation phase and thereafter, with designed space for flexibility of final below ground cabling.
- 1.9 The electrical upgrade work has now reached a stage of completion, so the flexibility afforded by the buffer gaps is no longer required. This application seeks consent to infill some of these gaps with pitches that in every other respect are identical in scope and specification to the existing approved pitches.

2 Policy

- 2.1 Under section 38(6) of the Planning and Compulsory Purchase Act 2004 decisions on applications for planning permission and appeals must be taken in accordance with the development plan, unless there are material considerations that indicate otherwise.
- 2.2 The National Planning Policy Framework ('**NPPF**') stresses the importance of having a planning system that is genuinely plan-led. Where a proposal accords with an up-to-date development plan it should be approved without delay. The NPPF constitutes guidance for local planning authorities and decision-takers both in drawing up plans and as a material consideration in determining applications.
- 2.3 In Cornwall, the development plan comprises the Cornwall Local Plan Strategic Policies 2010 - 2030 (adopted 22nd November 2016) as well as relevant 'saved' policies from the adopted Local Plans.
- 2.4 NPPF Paragraph 11 requires that the policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay.
- 2.5 An adopted Local Plan with policies regarding tourism related development and the protection of the countryside exists. As a result, the Development Plan is not absent or silent in relation to the proposed development.
- 2.6 Relevant policies of the Cornwall Local Plan: Strategic Policies 2010-2030 (the '**CLP**') include:
- 2.6.1 Objective 2: Enhance the cultural and tourist offer in Cornwall and to continue to promote Cornwall as a year round destination for tourism and recreation
 - 2.6.2 1: Presumption in favour of sustainable development
 - 2.6.3 2: Spatial strategy
 - 2.6.4 4: Policy 4: Shopping, services and community facilities
 - 2.6.5 5: Business and Tourism
 - 2.6.6 12: Design
 - 2.6.7 13: Development standards
 - 2.6.8 16: Health and wellbeing
 - 2.6.9 21: Best use of land and existing buildings
 - 2.6.10 22: European protected sites - mitigation of recreational impacts from development
 - 2.6.11 23: Natural environment
 - 2.6.12 24: Historic environment
 - 2.6.13 25: Green infrastructure
 - 2.6.14 26: Flood risk management and coastal change
 - 2.6.15 27: Transport and accessibility
 - 2.6.16 Appendix 3 - Schedule of saved policies:
 - 2.6.17 (North Cornwall Local Plan 1999) ENV1 - Protecting the countryside and landscape character
- 2.7 The National Planning Policy Framework 2023 (the '**NPPF**') is a material consideration, with particular regard to: -

- 2.7.1 Section 1. Introduction
 - 2.7.2 Section 2. Achieving sustainable development
 - 2.7.3 Section 4. Decision-making
 - 2.7.4 Section 6. Building a strong, competitive economy
 - 2.7.5 Section 8. Promoting healthy and safe communities
 - 2.7.6 Section 9. Promoting sustainable transport
 - 2.7.7 Section 11. Making effective use of land
 - 2.7.8 Section 12. Achieving well-designed places
 - 2.7.9 Section 15. Conserving and enhancing the natural environment
 - 2.7.10 Section 16. Conserving and enhancing the historic environment
- 2.8 The material revisions to the NPPF relevant to this development include:
- 2.8.1 Revised footnote 7 confirms it is the policies in the framework not the development plan that should be applied.
 - 2.8.2 Revised paragraph 56 states: “Planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. Agreeing conditions early is beneficial to all parties involved in the process and can speed up decision making. Conditions that are required to be discharged before development commences should be avoided, unless there is a clear justification.”
 - 2.8.3 Revised paragraph 82 states: “In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs, including proposals for community-led development for housing.”
 - 2.8.4 Revised paragraph 85 states: “Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.”
 - 2.8.5 Revised paragraph 88 states: “Planning policies and decisions should enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, beautiful new buildings.”
 - 2.8.6 Revised paragraph 88 states: “Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”
 - 2.8.7 Revised paragraph 109 states: “However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”

- 2.8.8 Revised paragraph 115 states: “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.”
 - 2.8.9 Revised paragraph 124(d) states: “[Planning policies and decisions should] promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure).”
 - 2.8.10 Revised paragraph 157 states: “The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”
- 2.9 Other material considerations include the National Planning Practice Guidance, the latest Cornwall Design Guide, and the Climate Emergency DPD.

3 Principle of Development/Use

- 3.1 Policy 5 of the Cornwall Local Plan confirms that the development of new or upgrading of existing tourism facilities through the enhancement of existing or provision of new, high quality sustainable tourism facilities, attractions and accommodation will be supported where they would be of an appropriate scale to their location and to their accessibility by a range of transport modes. Proposals should provide a well balanced mix of economic, social and environmental benefits.
- 3.2 In this case, the proposed development will add to a high quality and sustainable tourist accommodation offering, of a modest scale in relation to the location and existing development, and very accessible in the rural context.
- 3.3 The holiday park benefits from a bus service on the access in addition to running its own shuttle service into Looe during high season. Accordingly, although the development represents a form of internal enhancement of an existing business, the subject site is an accessible location in terms of CLP Policy 5.
- 3.4 The proposed pitches are low in number and are all in locations that require no landforming or groundworks. The proposed development is small scale especial relative to the existing consented development and low to the ground, and is not prominent in any wider views.
- 3.5 The principle of the proposed development is therefore supported by Policy 5 of the Cornwall Local Plan.
- 3.6 The development is also supported by Policy 21 of the Cornwall Local Plan, which strives to ensure the best use of land and buildings. This area of land subject to the application was set aside as a buffer to allow for flexibility in installing the new below ground upgraded electricity infrastructure. Following the successful installation, the buffer is no longer required in the locations under the application, the land is in very low-intensity use and the development will help to deliver economic objectives and benefits without compromising environmental or social considerations. The Holiday park benefits from substantial grounds outside of the development area, including nature walks and ponds. No adverse impact will result from the loss of these modest grassed areas of land.
- 3.7 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

- 3.8 The NPPF requires that planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. The NPPF paragraph 84 supports sustainable rural tourism and leisure developments which respect the character of the countryside.
- 3.9 The proposed development will help to make the best economic use of the site to meet the evolving demands of the tourism industry, which is a key economic sector in the region. The development facilitates year-round tourism accommodation which will provide visitors with a high-quality offering. This in turn will contribute to the viability of other facilities that benefit tourists and the wider community, such as the recently consented swimming pool.
- 3.10 The land in question is already part of the holiday park and the application relates to the number of pitches, not the use of land in principle, which has already been agreed.
- 3.11 The Cornwall Local Plan seeks a presumption in favour of sustainable development that improves the economic, social and environmental conditions in the area and recognises the importance of Tourism.
- 3.12 Objective 1 is to *“Remove unnecessary barriers to jobs, business and investment through a positive policy framework with a focus on sustaining a range of local businesses...”* The proposal will help with the long term viability of this local business, with direct and indirect employment and other economic activity that will be generated.
- 3.13 Objective 2 is to *“Enhance the cultural and tourist offer in Cornwall and to continue to promote Cornwall as a year round destination for tourism and recreation.”* The proposal will enhance the tourist offer by facilitating a year round high quality holiday accommodation provision.
- 3.14 Policy 5 states: *“Allow people and communities to provide for jobs and deliver homes locally to meet needs, where they can best support the role and function of local communities as well as allow for further change and adaptation.”* The considerable investment into the holiday park under the new ownership has already reaped significant benefits in terms of local employment and trade. This proposal develops this local benefit further.
- 3.15 Supporting paragraph 2.8 states: *“The quality of Cornwall’s landscapes, seascapes, towns and cultural heritage, enables tourism to play a major part in our economic, social and environmental wellbeing, it generates significant revenues, provides thousands of jobs and supports communities. Our key challenge is to realise this opportunity in better wages through improved quality and a longer season.”*
- 3.16 The proposal will allow this established holiday park to manage and maintain the business more effectively, making the best use of its resources. This ultimately benefits local jobs and the nearby rural economy.
- 3.17 Policies 2 and 23 seek to protect landscape character. The development has been located and designed to ensure there is no conflict with these policies.

4 Design/landscape

- 4.1 The site is within an AGLV, however the site location is within the heart of an existing holiday park and is permitted for holiday uses including a swimming pool and the siting of lodges already. The development is modest in scale and amounts to an improvement to the holiday offering in the local and wider area, with negligible landscape impacts.
- 4.2 The proposal adheres to the carefully designed landscaping plan already approved for the site location, which in turn is in keeping with the approved landscaping details for the wider park. An updated landscape plan can be conditioned, if required.

5 Highways and Accessibility

- 5.1 The development has no particular highways or access implications. It will necessitate a modest addition (17no.) to the total number of consented lodge pitches (186no.).
- 5.2 Policy 27 of the CLP requires development to (my emphasis) *“Provide safe and suitable access to the site for all people and not cause a **significantly adverse impact** on the local or strategic road network **that cannot be managed or mitigated.**”* The proposed development meets this policy requirement. There will be no significant adverse impact to the local or strategic road network as a result of this development.
- 5.3 There are no specific transport policies in the NPPF that suggest the development should be restricted.

6 Flood risk

- 6.1 None of the site is in flood zones 2 or 3, there is no known critical drainage issue at the site and the small scale of development will result in no material increase in surface water drainage potential.
- 6.2 The site is also below 1ha, so no FRA is required or necessary.

7 Foul water

- 7.1 The Applicant has agreed a mains connection to the site with SWW. Under the hierarchy a mains connection for this small scale of development is not required, however it would be the preference and is the proposed option.

8 Contaminated Land

- 8.1 To simplify requirements, the SDQ has been withdrawn and the information requirements are therefore based entirely upon whether the Site has the potential to be affected by land contamination (e.g. former industrial/commercial land).
- 8.2 Given the topography, current and former uses of the site and the neighbouring land, there is no reason to consider that the site has the potential to be affected by land contamination.

9 Green Infrastructure

- 9.1 Under Policy G1 of the CEDPD development proposals will be expected, where appropriate to the scale and nature of the development, to meet the principles of green infrastructure design.
- 9.2 The proposed development is to infill the site with up to 17no. lodge pitches within an existing approved holiday park layout. The most relevant bullet points under Policy G1 are (1): the green infrastructure should form a multifunctional network through the creation of linear and other green infrastructure features to provide and enhance natural connections using important local character features, including existing planting, trees, groups of trees, copses, wetland, hedgerows and opportunities for wild food foraging as the key starting point for green infrastructure proposals and retain, reinforce and embed them into the design of the development to create distinctive places with permeable boundaries that reference, reflect and enhance the local environment; and (5) Priority shall be given in landscaping schemes and natural planting to at least 50% pollinator friendly planting of predominantly native species.
- 9.3 The development proposal is within a site that already includes the provision of new screening planting under an approved landscaping scheme, connecting the existing and approved landscaping provision secured under the existing consents. The Applicant agrees to natural planting to at least 50% pollinator friendly planting of predominantly native species.
- 9.4 The development will continue to lead to a net benefit in terms of Green Infrastructure.

10 Habitat / protected species

- 10.1 The site is not within a locally or nationally designated site for nature conservation.
- 10.2 The site is laid to grass and well managed. There are no proposed works to any existing hedgerows or other biodiversity assets and all development is to be sited outside the root protection zone of any trees. The development does not meet the threshold for a phase 1 habitat survey, nonetheless a habitat survey has been commissioned to ensure no adverse impacts arising. No adverse impact is predicted on the natural environment as a result of the proposal.

11 Travel Plan

- 11.1 It is considered that the majority of occupants will arrive at the holiday park by private motor vehicle or by coach. The guests at the holiday park have available all the park's facilities within walking distance, including swimming pool (recently approved for upgrading), shop, restaurant and bar.
- 11.2 In addition, the park now has a dedicated collection and drop-off bus stop at the new roundabout within the complex, allowing easy accessibility to the site without having to rely on private vehicles. Further, the park operates a mini-bus service of its own into and back from Looe, further improving the accessibility of the site.
- 11.3 The internal estate road has been designed to ensure maximum accessibility for the widest range of guests.

12 Heritage Impacts

- 12.1 It is not considered that the proposed use will have any impact on heritage assets or on their settings.

13 Conclusion

- 13.1 The Applicant is in the process of investing substantially to the benefit of the local economy, which is a significant consideration in the current troubled times brought about following the global pandemic and a period of very high inflation. The site is in an ideal location for the provision of tourist accommodation facilities and is already purposed to such uses.
- 13.2 The revised NPPF provides enhanced support for the redevelopment of previously developed land, which further adds to the weight and urgency of allowing the proposed development.
- 13.3 The proposal will provide additional a high quality accommodation, offering greater capacity according to tourist demand.
- 13.4 The proposal will have positive impacts in terms of the local economy and in social terms, with negligible adverse impacts on the environment and clear environmental benefits, including a enhancements brought about by the proposed and existing developments.
- 13.5 The proposal will also ensure that the ongoing investment strategy for the holiday park continues, with an improved tourist offering and better maintained and managed facilities as a corollary.
- 13.6 The application is supported by the relevant national planning policy framework and by the Cornwall Local Plan. Officer support is therefore requested for the proposal.