

**6. FULL APPLICATION - RE-ORGANISATION AND UPGRADE OF THE EXISTING 'RIVENDALE HOLIDAY PARK' TO INCLUDE DEMOLITION OF EXISTING SITE BUILDINGS, CONSTRUCTION OF REPLACEMENT FACILITIES AND MAINTENANCE / HOUSEKEEPING BUILDINGS WITH PROVISION OF ACCOMMODATION IN THE FORM OF 78 LODGES, 7 CABINS, 3 FIELD BARNS, 25 PODS AND 2 TREE HOUSES AT ALSOP RIVENDALE TOURING CARAVAN AND LEISURE PARK, UNNAMED SECTION OF A515 FROM CROSSLOW LANE TO BACK LANE ALSOP EN LE DALE (NP/DDD/0219/0137, TS)**

**APPLICANT: MR ROGER VAIL**

**UPDATE**

This application was discussed at the May Planning Committee meeting. Members resolved to defer the application to allow us to provide clarification about the following issues:

1. The historic/vernacular interest that is retained in the existing facilities buildings and whether this could/should be retained and possibly repurposed.
2. Better explanation of how the scheme relates to policy.
3. The appeal decision which allowed statics in 1995.
4. More information about the landscape impact and possible impacts on dark skies of the glazed elevation of the facilities building.
5. Revisions of the maintenance building design.

Since the last Committee meeting we have met with the applicant's agent and changes have been made to the proposed scheme as follows:

- The number of proposed lodges and cabins has been reduced from 85 to 75. A revised site plan has been submitted.
- Revised elevation drawings have been submitted for the proposed replacement facilities building showing an improved treatment to the south east facing elevation.
- Revised elevation drawings have been submitted for the proposed maintenance building to give a simplified appearance.

Furthermore, additional information has been provided about other issues that were raised at the last Committee meeting. This is summarised as follows:

- The existing facilities building is unsuitable because it is operationally compromised and fails to meet DDA standards. The ground floor of the building has 9 different floor levels and comprises of 3 separate and unconnected areas. The first floor has five different floor levels and comprises of 3 separate and unconnected spaces.
- A comparative energy assessment between the existing facilities building and the proposed new one. It is estimated that the new building would save around 140,000 kWhr/yr in heating consumption and about 34,000 kg of CO2 emissions per year.
- A heritage assessment of the existing building has now been undertaken and is discussed in more detail below. 53% of the former farm building complex has already been demolished and what remains has been subject to significant alteration.
- Further information has been provided about the ecological and wider biodiversity enhancements including 1.17 hectares of the site returned to green space, creation of 2.5 hectares of hay meadow and woodland grassland, creation of 3 ponds and enhancement to the existing pond, provision of 10 bat boxes, provision of 20 bird nesting boxes and swift terraces, provision of 5 owl nesting boxes and the provision of habitat features for great crested newts and other amphibians.
- Further information has been provided about arboriculture enhancement. Whilst the scheme involves the removal of 46 trees (that have been surveyed as being of mainly

poor-quality), 322 new trees and 7,475 square metres of native planting is proposed. An ash die back strategy has also been produced.

- Information has been provided about the economic benefits of the scheme and the applicant's business model. This sets out that Darwin is a pension funds and infrastructure investments manager. The scheme would involve a capital investment of between £11 million and £13 million. It is estimated that the development would increase the off-site spend from visitors from £1.1 million to £2.7 million. The applicant has also reiterated previously submitted information that the scheme would increase employment from 5 seasonal jobs at present to 30 permanent staff, as well as the use of between 15-60 contract cleaners.

Another important factor since the previous Committee meeting is that the Development Management Policies document has now been formally adopted. This was at an advanced stage anyway at the time of the last meeting so was already a material planning consideration. The document is however now formally the second part of our local plan. The policies from the previous Local Plan now carry no weight. Policies DMT3, DMT5, DMT6, DMR1, DMR2 of the Development Policies Document are particularly relevant. As these policies had already been given weight, the formal adoption of the policies does not change the overall assessment or conclusion.

Each of the five issues that Members requested further information about are discussed below:

Issue 1 – the historic and vernacular interest in the existing building and whether this could be reused.

The scheme involves the demolition of the existing facilities building and the construction of a replacement facilities building. Members raised concerns with the loss of the existing building and asked for further information to be provided about the heritage value of it and for consideration to be given to reusing it.

Following the last Committee, we asked the applicant to carry out a heritage assessment of the existing building. This has been undertaken and submitted.

This assessment outlines how the former farm buildings complex has evolved and been altered. The 1880 OS maps show a rectangular building oriented north west to south east. By 1899, a second building was added to form an L-shape. An entirely new building just to the north west had also been built. It is believed that the detached building was a farmhouse and the L-shaped buildings were barns.

On the 1922 OS map the quarry is evident and a tramway runs very close to the buildings complex, suggesting that the buildings were closely associated with quarrying operations and probably not in agricultural use anymore. By 1949, the complex had been added to further and the former barns were now a C-shaped range of buildings.

The 1973-75 OS maps shows the former farm house had been demolished and the barns reduced in size back to an L-shaped arrangement. In 1995 the L-shaped range was still present but a number of smaller structures had been removed. The L-shaped range is the main part what remains on site today.

In 1995 permission was granted to convert the building into a facilities building for the caravan site. This permission included alterations to the former barn and a large extension to it to provide a swimming pool. The swimming pool extension was not completed but it is likely that the permission remains extant as other elements were implemented. Since 1995, the building has been re-roofed, a chimney has been added and alterations have been made to the openings. Two separate extensions have been added and the internal layout has changed considerably

through sub-division of spaces that would historically have been open. A modern external staircase and a balcony have also been added.

With the benefit of the information contained within the heritage assessment we have re-evaluated the heritage significance of the existing building. It is evident that the main two storey elements of the building that stands today are former barns. Part of the building predates 1880 and the other part was added by 1899. The farmhouse that was previously associated with the barns has been demolished. The barns have been altered externally in modern times and significantly altered internally.

In terms of the heritage value therefore, the buildings have some historic interest as they are a serving record of the agricultural past of the site. They help to understand the history of the site as it changed from agriculture to quarrying and most recently to being part of the caravan site. They buildings also retain some vernacular merit, albeit limited by the modern additions and alterations that have taken place.

Overall therefore, we are of the view that the existing building does have some historic and vernacular value. This value is however not significant enough to make the retention of the building essential. The loss of the historic value could be partially mitigated through building recording. The architectural value of the building and the contribution it makes to the landscape character are not significant and as such the removal of the building would not be significantly harmful in this respect.

As well as providing further information about the heritage value of the building, the applicant has also provided additional information about the possible reuse of the existing building. Summarised, this sets out that consideration was originally given to the reuse of the existing building. However, the fundamental issues with doing so are the multiple level changes within it, lack of interlinkage between the separate areas (there are effectively 3 separate buildings at the moment) and the lack of useable first floor space. In order to provide the level of facilities that would be offered within the proposed new building, a significantly sized extension to the existing building would be needed which would further erode its character. The new building would be far more energy efficient than the existing one. This would still be the case even in measures were taken to improve the performance of the existing building. Because of this, the application still proposes a replacement building, rather than the reuse of the existing one. Even if the building was used as staff accommodation, it would still need to be accessible and DDA compliant and this cannot be achieved.

Overall, it is considered that the minor harm through loss of historic interest and a building that retains some vernacular merit would be outweighed by the provision of a purpose built facilities building with good accessibility and energy efficiency and that forms part of a site that better promotes the enjoyment and understanding of the national park than the existing site.

#### Issue 2 - Better explanation of how the scheme relates to policy.

Members raised concerns about how the scheme relates to policy, particularly policy RT3. Policy RT3 states the following:

Proposals for caravan and camping sites must conform to the following principles (emphasis added in bold):

- A. Small touring camping and caravan sites and backpack camping sites will be permitted, particularly in areas where there are few existing sites, provided that they are well screened, have appropriate access to the road network, and do not adversely affect living conditions.
- B. Static caravans, chalets or lodges will not be permitted.**

- C. Provision of improved facilities on existing caravan and camping sites, including shops and recreation opportunities, must be of a scale appropriate to the site itself.

**D. Development that would improve the quality of existing sites, including improvements to upgrade facilities, access, landscaping, or the appearance of existing static caravans, will be encouraged.**

The policy should be read with the supporting text, which states:

*“Exceptionally, static caravans, chalets or lodges may be acceptable in locations where they are not intrusive in the landscape. There may be some locations where, through the use of effective design and landscaping, small, simple timber structures may be acceptable as replacements for existing static caravans where this would result in enhancement.”*

And that:

*“The type of all-inclusive ‘holiday park’ where visitors have all the facilities and entertainment they need and do not venture out to enjoy the area is not in line with the second national park purpose.”*

This is a very well screened site and one in which the replacement of existing authorised static caravans with lodges is considered to be acceptable as it will improve the quality of the existing site without causing landscape harm.

There are 37 existing statics and lodges. The replacement of these with new lodges is considered to be acceptable in principle and raises no conflict with policy RT3. Replacing touring pitches with lodges does raise more complex policy issues.

It is important to understand that 33 of the existing pitches are authorised as winter storage pitches. This means that caravans can be sited on these pitches all year round without having to leave the site. There is no restriction on the maximum size of touring units that can be placed on these pitches under the existing planning permission. The only restriction is that imposed on the definition of a caravan under the relevant act. So 33 of the touring pitches can actually be used all year round and not just in the traditional transient and seasonal way that touring pitches would be used. The winter storage pitches therefore are actually very similar to static caravan pitches in terms of use and volume of built development. It is considered that there is a clear exception basis here that justifies the replacement of the 33 winter storage pitches with lodges on the basis that the landscape and visual impact would be nil and that the proposal would otherwise accord with part D of RT3.

The applicant has calculated that under the existing permissions, 75,580 square feet of caravan floor space can be sited all year round. The total amount of year round accommodation that is now proposed is 57,563 square feet; a significant reduction.

We therefore consider that there is a clear policy basis on which to support the replacement of the 70 existing static caravans and winter storage pitches with 70 lodges / cabins.

The scheme was previously for 85 pitches, so it is acknowledged that the scheme was for 15 more lodges than existing statics and winter storage pitches. We were of the view that this was justified by the other benefits of the scheme and the improvements that would be made to the site as a whole. However, member’s reservations about this approach are understood and this was put to the applicant by officers.

Ten lodges and cabins have now been omitted from the scheme, meaning a reduction from 85 to 75. The number of lodges that are now proposed only exceeds the existing number of static and winter storage pitches by 5.

We believe that the following factors justify the number of cabins and lodges that are now proposed:

- The reduction in floor space of units that can be sited year round at the moment of 24%.
- The significant amount of land (1.17 hectares) that would be returned to green space within the site.
- The detailed travel plan that the applicant has produced and the tangible measures designed to encourage guests to venture out into the National Park beyond the boundaries of the site.
- The ecological enhancements to the site.
- The significant amount of native tree planting and ash die back management
- All of the above represent planning gains that cannot be secured if the site continues to operate under its existing permissions.

We therefore accept that the replacement of touring pitches with lodges / cabins raises conflict with policy RT3 but the development would result in significant improvement to an existing site, which is also an aim of policy RT3. Whilst the proposal could not be said to fully comply with policy RT3, there are clear benefits that justify an exception being made to part B of that policy in this particular case.

Members raised some concerns about setting a precedent for the replacement of touring pitches with lodges elsewhere within the park.

It must be stressed that our decision to support the application is based solely on the particular merits and circumstances of this case. There are a number of relevant factors here that are unlikely to all be repeated at other sites. These are:

- The planning history;
- scope of the existing authorised/immune development;
- limited existing planning controls; and
- The location of a significant part of the site within a former quarry floor

Ultimately, it is considered that in this particular instance and having regard to the issues outlined above, the replacement of existing pitches here would result in clear enhancement to the site both in terms of its appearance and how it aligns with our second purpose to promote enjoyment and understanding of the National Park. It is very unlikely that replacing touring caravan pitches with lodges would deliver similar enhancements and have no visual impact at other sites within the National Park. As such, it is very unlikely that this development would set a precedent simply because the unique factors of the case are unlikely to be replicated elsewhere. Because the development is contrary to part of RT3 we have advertised it as a potential departure to the development plan.

### Issue 3 - The appeal decision which allowed statics in 1995

Members requested further information about the 1995 appeal at the site and how this relates to the current proposals.

The 1995 appeal related to an application for siting static caravans within the former quarry. The Authority had refused the application but the appeal was allowed. The relevance of the appeal decision is somewhat limited by the passing of time since then and that all local and

national planning policy and guidance has been updated since then. However, it is clear that the Inspector gave significant weight to the particular site circumstances and the lack of prominence that the site has in the landscape. This is still considered to be a very relevant factor that, along with the other aforementioned benefits of the scheme, amount to the exceptional circumstances that justify an expectation to the general presumption against lodge developments within the National Park.

Issue 4 - More information about the landscape impact and possible impacts on dark skies of the glazed elevation of the facilities building.

As well as the issue about the loss of the existing facilities building, which is addressed above, members raised some concerns about the design of the replacement building and the possible impacts on dark skies from the large amount of glazing proposed.

Amended elevation drawings have been submitted which show some design changes to address these concerns. The overall form and design approach remains the same; a contemporary single storey building with a curved green roof. However, the south east facing rear elevation, which is the most visible in the wider landscape, has been improved by removing horizontal glazing bars to give a better vertical emphasis. A canopy is now proposed all the way along this elevation.

In addition, the applicant has provided sunlight and dark skies analysis as well as additional lighting information.

It should be noted that there is no control over external lighting in the existing permissions so this application is an opportunity to exercise control. The submitted Landscape and Visual Impact Assessment includes a dark skies assessment and includes images of the existing facilities building at night which show existing light spill. Appropriate design of the new building and control over external lighting is likely to improve the existing situation. The sunlight assessment shows that direct sunlight will only shine onto the south eastern elevation of the proposed new facilities building for a short time (varying depending on the time of year) during the morning. As such, glare from the glazing in the south eastern elevation will be very limited.

In order to control light pollution from the replacement building, a canopy is now proposed that would run along the full width of the rear elevation. Furthermore a particularly type of glass is proposed that has enhanced performance in terms of noise reduction, solar control, anti-glare and light transmission. We consider that the light pollution and glare from the building will be limited and not harmful to the valued characteristics of the National Park.

The external lighting scheme for the site comprises of low level lighting bollards and a limited number of post mounted stirrup light columns. The use of low level directional lighting will again limit the amount of light pollution to an acceptable level and is likely to result in betterment when compared to the existing situation.

Issue 5 - Revisions of the maintenance building design.

The design of the proposed maintenance and housekeeping building has now been amended and we consider this to be an improvement. The gable features have been omitted and the materials would now be a rendered wall to the ground floor level with profile sheeting above. This gives a simple and functional appearance that is suitable for the given use and the proposed siting in a non-public facing area of the site. The amended design is considered to be acceptable subject to appropriate window and roof light detailing, which can be secured with a condition being attached to any approval.

## **UPDATE CONCLUSION**

The applicant has continued to work positively with us since the previous Committee Meeting. The reduction in lodges and cabins from 85 to 75 is considered to be significant in terms of a reduction in intensity of the use. The amendments to the new building designs are welcomed and more information has been provided to help make a more informed judgement in terms of the historic and vernacular value of the existing former farm building and the impact of lighting at the site.

The proposed development would deliver enhancement to the existing site in a manner that would be in line with the National Park purpose to promote understanding and enjoyment of the special qualities of the National Park. The development would have no adverse impact on the landscape character of the area. The development is recommended for approval.

## **Summary**

1. The application seeks permission to upgrade a long-established and very large camping and caravan site. We believe that the proposed scheme would deliver tangible enhancement to the site. The applicant has worked positively with the Authority to produce a scheme for redevelopment that would deliver a site that is more beneficial to promoting understanding and enjoyment of the National Park than the current site. The application is recommended for approval.

## **Site and Surroundings**

2. Rivendale is a large and long established camping and caravanning site located to the southern side of the A515. The site has an area of 14.5 hectares, a large section of which is a former quarry. The rest of the site is wooded grassland and areas that have been hard surfaced.
3. The existing site comprises of a total of 186 caravan and camping pitches. At the moment, these pitches comprise of 37 static caravans and wooden lodges, 33 winter storage touring pitches, 51 touring pitches, 44 camping pitches, 15 pods, 2 yurts and 4 B&B rooms.
4. The site is accessed directly from the A515. To the south western side of the access point there is a parking area and a portable building that contains toilet facilities. Beyond this area there is a large wooded area that is currently used for camping.
5. In the central area of the site there is a stone built former farm building that has been considerably extended and altered. This building serves as a reception, restaurant and bar. To the north of this there is another existing building which is similar in appearance to a modern agricultural or industrial building. This building is a maintenance store.
6. To the east of this building there is an area that has been developed with several wooden camping pods and other buildings that have been used as spa facilities and a number of camping pitches. Further still to the east of the site opens into the former quarry floor and is surrounded by the high quarry walls. This area is very developed with large amounts of hard surfacing and roads. There is also a facilities building towards the centre of the former quarry area.
7. A public right of way enters the site at the same point as the vehicular access and crosses the site before joining the open fields to the south of the site.

8. To the north of the site, beyond the A515, there are open fields. The Tissington Trail lies only a few metres further north of the A515. The site is also surrounded by open fields to the south. There is a row of residential dwellings that lie about 100 metres from the southern boundary of the site. These are the nearest neighbouring properties.

### **Proposal**

9. The application seeks full planning permission for the reorganisation and upgrade of the site.
10. The proposal involves the removal of the existing static caravans, touring caravan pitches and wooden pods and huts.
11. These would be replaced by 78 lodges and 7 cabins. The proposed lodges and cabins range from 1 to 4 bed spaces, so are similar in size to a typical static caravan. The lodges and cabins are, by definition, still static caravans but have the appearance of small buildings. The lodges would be clad in a timber effect product called 'Canoxel'. The cabins are smaller versions of the lodges and would have cedar clad walls and mono-pitched green roofs. The majority of these (67) would be sited within the quarry floor area. 18 would be sited within the central area of the site.
12. 25 wooden camping pods are proposed within the wooded area to the western side of the site that is currently used for tent camping. The pods would be sited to the perimeter of the area with the rest of this part of the site still being available for tents. A new toilet block is proposed for the camping area.
13. The scheme also includes the provision of 2 tree houses within the wooded area in which the camping pods would be sited. These would be constructed 1-2 metres above ground level, supported by heavy timber posts and would be timber clad.
14. It is also proposed to construct three field barn type buildings that would be stone built structures to provide further accommodation. A fourth field barn type building is also proposed but this is just to provide a replacement bat roost habitat and would not be used for any other purposes.
15. The scheme also includes the demolition of the existing facilities and maintenance buildings and the construction of replacement buildings in similar positions within the site. The proposed facilities building would be a contemporary single storey structure. The replacement maintenance building would be of two storey scale and built in a similar form to a modern agricultural building.

### **RECOMMENDATION:**

16. **That following the conclusion of the advertisement period for the notice advising that the proposal may be a departure from the development plan any further representations be reported to Chair and Vice Chair of Planning Committee and subject to their agreement and the agreement of the Head of Development Management the application be APPROVED subject to the following conditions:**
  1. Time limit for commencement.
  2. Development to be carried out in accordance with the submitted plans.
  3. Holiday occupancy restriction to be placed on all units.
  4. The field barns are to be omitted from the scheme other than the single barn that is only for a replacement bat roost.
  5. Contaminated land remediation to be approved if contamination is found during development.

6. Ecology mitigation to be approved and then implemented.
7. Facilities building is for use by overnight guests only.
8. The accommodation within the maintenance building shall be for occasional staff use only and shall not be let to visitors or be a permanent dwelling.
9. Renewables to be implemented.
10. Travel plan to be adopted and implemented.
11. Materials and colour details of all units to be approved.
12. Lighting scheme to be approved.
13. Scheme for grassland enhancement to be approved.
14. Construction traffic method statement to be approved.
15. Provision and retention of parking spaces.
16. Materials and glazing details for new facilities and maintenance buildings to be approved.
17. Drainage strategy to be implemented.
18. The lodges, cabins and camping pods shall only be sited in accordance with the submitted plans and no units shall be sited elsewhere within the application site.
19. Total number of lodges and cabins shall not exceed 75 and the number of camping pods will not exceed 25 no other static or touring caravans shall be brought onto the site at any time.
20. Camping pods shall not include kitchen facilities and shall be no larger than as set out on plans.
21. Landscaping scheme shall be approved
22. Scheme for protection of trees and replacement to be approved.
23. Removal waste and demolition materials prior to occupation unless otherwise approved.

**Unilateral undertaking for relinquishment of existing planning permissions and rights.**

**Footnote: all cabins shall not exceed the definitions set out in the Caravan Act**

### **Key Issues**

- The principle of development.
- Impact of the proposed development upon the landscape character and special qualities of the National Park.
- Whether the development would promote understanding and enjoyment of the special qualities of the National Park.
- Amenity Impacts
- Highways Impacts
- Ecology Impacts

### **History**

There is extensive planning history for the site, including the following applications:

January 2011: Application approved for removal of 2 existing static caravans and toilet and shower building and replacement with a new single building.

December 2009: Application approved to relinquish a permission on plot D and transfer it to plot B.

- February 2007: Application for conversion of agricultural building into four bedrooms with ensembles was not determined by the Authority. An appeal against non-determination was then allowed in August 2007.
- January 2006: Application refused for removal of a condition restricting sales of food and alcohol from the bar and restaurant to overnight guests. An appeal against the refusal was dismissed in October 2006.
- April 1999: Application approved for the conversion of the former farm buildings to bar and café.
- September 1997: Application refused for siting of mobile homes as an alternative to touring caravans. An appeal was later part-allowed.
- November 1994: Application refused for a camping and caravanning park with new and converted associated building. An appeal was later allowed.
- July 1985: Application approved for use as a caravan and camping site.
17. Pre-application advice was sought from the Authority prior to the submission of the current application. The initial scheme was for 133 lodges, including the provision of lodges on the existing camping field. The applicant was advised that the principle of replacing existing static caravans with lodges was acceptable at this location. Also, the replacement of touring pitches with lodges could be acceptable at this site if overall enhancement of the site could be achieved and it could be demonstrated that the scheme maximised opportunities to promote understanding and enjoyment of the National Park. A scheme that would create an all-on-site holiday park would not be supported. The provision of lodges on the camping field would not be supported and a smaller number of small and simple camping pods here was suggested instead. The applicant has taken notice of this advice and has worked positively to address these matters in the preparation of the final scheme.

### **Consultations**

18. Eaton, Alsop and Newton Grange Parish Council: No comments received.
19. District Council: No response to date.
20. Highway Authority: The total number of accommodation units would be reduced and there is no evidence to suggest the development will significantly increase the traffic generation associated with the site. Recommend conditions for provision of construction traffic and for the parking for the accommodation units to be provided and retained.
21. Lead Local Flood Authority (LLFA): Initially noted that insufficient information had been provided about the proposed infiltration method of disposal for surface water.
- An updated drainage strategy has been provided by the applicant that contains the requested information. The LLFA has been reconsulted. No further comments have been received at the time of writing.
22. Environment Agency: The proposed development will be acceptable if a planning condition is included requiring the appropriate remediation of any contamination that is discovered during development.

23. PDNPA Planning Policy: The essence of adopted policy is to promote forms of holiday accommodation which are in line with the second national park purpose. This is to promote opportunities for the public to learn about and enjoy the National Park. As such the type of all-inclusive 'holiday park' where visitors have all the facilities and entertainment they need on site, and do not venture out to enjoy the area, has long been resisted within the Peak District National Park.

The need to assess the direction of travel for this site will be key, i.e. moves to consolidate the internally facing appeal of the site based on its own facilities and attractions are contrary to the intent of RT3 and should therefore be rejected. Whereas opportunities to green the site and promote its connection and relationship to the wider landscape should be supported.

Opportunities exist to enhance the character and appearance of the site as well as its relationship to the surrounding countryside.

The need to promote the understanding and enjoyment of the National Park is a key role for large sites such as this.

It is unclear whether the TRICS analysis used to forecast traffic movements is a suitable compression for a site within a busy National Park.

It is likely that the majority of users of the site will access it by private motor vehicle. There are opportunities to encourage movements within and around the site by more sustainable means. The design of the site supports minimising unnecessary vehicle movements once visitors arrive. The promotion of public transport links, plus the walking and cycling routes in close proximity to the site would also encourage more sustainable travel by those holidaying at the site.

A travel plan is recommended aimed at encouraging visitors to arrive at site by public transport or other more sustainable means of access and to encourage those visiting the site who initially arrive by car to use other means of transport whilst staying on the site. This would reduce the overall impact of the site, whilst also encouraging visitors to make the most of the surrounding rights of way and trail network to explore the National Park.

24. PDNPA Landscape Architect: Overall the proposal will provide opportunities to improve the site both internally and externally. The site has previously been used as a dark skies viewing site and opportunities should be taken to reduce the impact of lighting.
25. PDNPA Senior Archaeologist: Notes that the archaeological interest associated with the former quarry has been lost as a result of the existing caravan park development. Part of a 19<sup>th</sup> century former farmstead remains at the site. It is recommended that from a cultural heritage perspective the farmstead buildings should be retained, rather than being demolished and replaced as proposed. The proposed new field barns also raise concerns from a cultural heritage perspective. Field barns are an important part of the historic landscape character of parts of the Peak District but would be out of place at this site. Trying to create accommodation based on a modern pastiche of a field barn would be out of place within the landscape and historic farming developed at this particular site.
26. PDNPA Public Rights of Way: No objections
27. PDNPA Ecologist: The proposed dedicated bat barn would provide mitigation for the loss of an existing maternity bat roost that is located within the facilities building that is proposed to be demolished. There may also be scope to make provision for swallow nesting within the barn. Design details should be conditioned.

Lighting levels are a concern due to the potential impacts on bats and should be minimised.

Great crested newts have been found on the site and a condition for details of the mitigation is recommended. Mitigation measures for badgers and birds should be implemented.

The proposed landscaping scheme includes some non-native species and these should be omitted. Opportunities should also be sought to enhance the grassland to the north of the site.

28. PDNPA Tree Officer: The proposed development will result in the loss of 43 individual trees, 11 groups of trees and the partial removal of a further five groups of trees. The loss of these trees should be mitigated through significant replanting of new trees.

### **Representations**

29. Four letters of general comment have been received that all raise no concerns about the proposed development but note that there are existing leaseholders of existing static caravans at the site and no mention of this has been made in the application.
30. One of the letters of general comment raises concerns that the development would result in disturbance to nearby residents and would increase vehicular movements to and from the site.
31. One letter of objection has been received, which is from Pinelodge Holidays Ltd. The grounds for objection are summarised as follows:
- The application is in direct conflict with the NPPF and the Authority's Core Strategy. Policy RT3 states that chalets or lodges will not be permitted.
  - Pinelodge Holidays Ltd have previously been advised that applications for lodge developments within the National Park would not achieve planning approval.
  - The development would create new unsustainable traffic movements with the National Park.
  - The proposal would create a precedent for new lodge parks within the National Park.
  - The proposal would seriously affect the viability of existing caravan and lodges parks and business that are correctly sites outside of the National Park boundary.
32. One letter of support has been received which sets out that the development would improve the appearance of the site, would create jobs and would attract more tourists to the area.

### **Main Policies**

33. Relevant Core Strategy policies: GSP1, GSP2, GSP3, L1, L2, L3, RT1, RT3, CC1, CC2, HC5, E2, T1, T2, T6, T7
34. Relevant Local Plan policies: LC4, LC16, LC17, LC18, LC20, LC21, LC22, LC24, LT11 and LT18
35. Relevant Emerging Development Management Policies: DMT3, DMT5, DMT6, DMR1, DMR2

### National Planning Policy Framework

36. In the National Park the development plan comprises the Authority's Core Strategy 2011 and saved policies in the Peak District National Park Local Plan 2001. Policies in the Development Plan provide a clear starting point consistent with the National Park's statutory purposes for the determination of this application. It is considered that in this case there is no significant conflict between prevailing policies in the Development Plan and the National Planning Policy Framework (NPPF).
37. Paragraph 172 of the NPPF states that 'great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.'

### Development plan policies – Core Strategy

38. Policy GSP1 sets out the broad strategy for achieving the National Park's objectives having regard to the Sandford Principle, (that is, where there are conflicting desired outcomes in achieving national park purposes, greater priority must be given to the conservation of the natural beauty, wildlife and cultural heritage of the area, even at the cost of socio-economic benefits). GPS1 also sets out the need for sustainable development and to avoid major development unless it is essential, and the need to mitigate localised harm where essential major development is allowed. GSP2 sets out that opportunities for enhancing the valued characteristics of the National Park will be identified and acted upon.
39. Policy GSP3 sets out development management principles and that all development must respect, conserve and enhance all valued characteristics of the site and buildings, paying particular attention to, amongst other elements, impact on the character and setting of buildings, scale of the development appropriate to the character and appearance of the National Park, design in accordance with the National Park Authority Design Guide and impact on living conditions of communities.
40. Policy L1 identifies that development must conserve and enhance valued landscape character and valued characteristics. .
41. Policy L2 states that development must conserve and enhance any sites, features or species of biodiversity importance and where appropriate their setting. Other than in exceptional circumstances development will not be permitted where it is likely to have an adverse impact on any sites, features or species of biodiversity importance or their setting that have statutory designation or are of international or national importance for their biodiversity.
42. Policy L3 sets out that development must conserve and where appropriate enhance or reveal the significance of archaeological, architectural, artistic or historic assets and their settings.
43. Policy RT1 states that The National Park Authority will support facilities which enable recreation, environmental education and interpretation, which encourage understanding and enjoyment of the National Park, and are appropriate to the National Park's valued characteristics. Opportunities for access by sustainable means will be encouraged.

44. Policy RT3 states that small touring camping and caravan sites and backpack camping sites will be permitted, particularly in areas where there are few existing sites, provided that they are well screened, have appropriate access to the road network, and do not adversely affect living conditions. It goes on to include the following relevant parts:
  - b. Static caravans, chalets or lodges will not be permitted.
  - c. Provision of improved facilities on existing caravan and camping sites, including shops and recreation opportunities, must be of a scale appropriate to the site itself.
  - d. Development that would improve the quality of existing sites, including improvements to upgrade facilities, access, landscaping, or the appearance of existing static caravans, will be encouraged.
45. CC1 sets out that development must make the most efficient and sustainable use of land, buildings and natural resources. Development must also achieve the highest possible standards of carbon reductions.
46. CC2 sets out that proposals for low carbon and renewable energy development will be encouraged provided they can be accommodated without adversely affecting landscape character or the special qualities of the National Park.
47. HC5 sets out that retail use in the countryside will only be acceptable where proposals are small scale and ancillary to a business acceptable under policy E2. Such proposals must not have an adverse impact on local centers.
48. E2 sets out that proposals to accommodate growth and intensification of existing businesses will be considered carefully in terms of their impact on the appearance and character of landscapes. Ancillary retail operations must be small scale and principally offering for sale goods which are produced at the premises.
49. T1 sets out that conserving and enhancing the National Park's valued characteristics will be the primary criterion in the planning and design of transport and its management.
50. T2 sets out that Sustainable transport patterns will be sought that complement the development strategy. Travel Plans will be used to encourage behavioral change to achieve a reduction in the need to travel, and to change public attitudes toward car usage and public transport, walking and cycling. Travel Plans to reduce traffic movements and safeguard transport infrastructure will be required on appropriate new developments and encouraged on existing developments.
51. T6 sets out that The Rights of Way network will be safeguarded from development, and wherever appropriate enhanced to improve connectivity, accessibility and access to transport interchanges.
52. T7 sets out that non-residential parking will be restricted in order to discourage car use, and will be managed to ensure that the location and nature of car and coach parking does not exceed environmental capacity.

Development plan policies – Local Plan

53. Policy LC4 sets out that where development is acceptable in principle, it will be permitted provided that its detailed treatment is of a high standard that respects, conserves and where possible it enhances the landscape, built environment and other valued characteristics of the area.
54. Policies LC15 and LC16 provide detailed criteria to assess development that affects archaeological and historic sites.
55. Policy LC17 provides more detailed criteria to assess development that may affect protected sites, species or habitats.
56. Policy LC18 states that where development which could affect a site, feature, or species of nature conservation importance or its setting is acceptable, appropriate safeguards and enhancement will be required to minimise adverse impacts.
57. Policy LC20 states that where development that involves risk of damage to trees, woodlands or other landscape features is acceptable, adequate space must be left for their replacement with appropriate species of trees and shrubs or local materials. Appropriate maintenance that respects wildlife interests will be required.
58. LC21 sets out that development that presents a risk of pollution or disturbance will not be permitted unless acceptable mitigation measures can be put in place.
59. LC22 requires that adequate measures are included to deal with surface water run-off.
60. LC24 requires that where there is suspicion or evidence of slight contamination an assessment will be required and remedial measures must be agreed before development commences.
61. Policies LT11 and LT18 require development to be provided with appropriate access and parking provision which conserves the environmental quality of the National Park.

#### Emerging Development Management Policies

62. The Authority's emerging Development Management Policies Document is not yet adopted but is now at a very advanced stage. As such, the policies can be given significant weight as a material planning consideration in the assessment of the application.
63. DMT3 sets out the requirement for new transport related infrastructure to be of the highest standards of environmental design and materials.
64. DMT5 sets out the requirement to ensure that where a development affects a right of way, that either the existing route be retained, or one that is equal or better to the original be provided.
65. DMT6 states that new or enlarged car parks will not be permitted unless a clear demonstrable need can be shown.
66. DMR1 sets out that the development of a new touring camping or touring caravan site, or small extension to an existing site will not be permitted unless its scale, location, access, landscape setting and impact upon neighbouring uses are acceptable, and it does not dominate its surroundings. Exceptionally, the development of structures may be permitted where these are small, simple, wooden pod structures in woodland locations with minimal landscape impact.

- 67. DMR2 sets out that where the development of a touring camping or touring caravan site is acceptable, its use will be restricted to holiday accommodation.
- 68. It is considered the Authority's adopted design and conservation policies in the Development Plan are consistent with national policies in the NPPF, which emphasise the great weight that should be attached to the conservation and enhancement of the National Park landscape, its wildlife and cultural heritage in any planning decision, and also promote high standards of design that would be sensitive to the valued characteristics of the National Park.

## **Assessment**

### Principle of Development

#### *(i) Principle of major development within the National Park*

- 69. The size of the application site means that the application is for major development within the National Park as defined by the Development Management Procedure Order (DMPO).
- 70. The NPPF and policy GSP1 of the Core Strategy both resist major development within the National Park in all but exceptional circumstances.
- 71. A High Court decision in 2013 found that for the purposes of planning policy, major development' should not have the same meaning as in the DMPD; rather it should be considered in the context of the document it appears and concluded that it is reasonable to apply the normal meaning of the words when interpreting policies. This means that the presumption against major development does not automatically apply just because the size of an application site is over the 1 hectare threshold which is the definition of major development in procedural terms.
- 72. Instead, it is reasonable and necessary to assess whether or not the development is major by reference to its potential impacts on the National Park's valued characteristics as protected by planning policies. In this case, the site is a large and long-established camping and caravanning site. As is discussed further below, although the site area is large, the development would result in a reduction in the total amount of built and engineered form at the site. As such, the development would not be major in terms of its likely impacts on the National Park. That is not to say that the impacts could not still be significant within the context of the site itself and its immediate surroundings – only that the restriction placed on major development by national and local policy are not considered to apply to this proposal.

#### *(ii) Principle of the type of accommodation proposed*

- 73. The Authority's recreation and tourism policies are clear that static caravans, chalets or lodges will not normally be permitted. However, the supporting text to policy RT3 goes on to state that exceptionally, static caravans, chalets or lodges may be acceptable in locations where they are not intrusive in the landscape. There may be some locations where, through the use of effective design and landscaping, small, simple timber structures may be acceptable as replacements for existing static caravans where this would result in enhancement.
- 74. The thrust of the recreation and tourism policies is to ensure development is in line with the second National Park purpose to promote understanding and enjoyment of the special qualities of the National Park. This is absolutely key to the acceptability of redevelopment of the site. A redevelopment that led to the creation of an all-inclusive

holiday park where visitors have all the facilities and entertainment they need and therefore they do not venture out to enjoy the national park would be wholly contrary to this purpose and would not be acceptable.

75. A letter of objection from a different holiday park operator has raised concerns that a development of holiday lodges is contrary to policy RT3 and that the operator has previously been advised by the Authority that a holiday lodge development would not be acceptable within the National Park.
76. That advice is correct. However, it is important to remember that this application is for the redevelopment of a very large and long-established site, and is not for the creation of a new site. Part D of policy RT3 is clear that development that would improve the quality of existing sites, including improvements to upgrade facilities, access, landscaping, or the appearance of existing static caravans, will be encouraged.
77. The key issues for the acceptability of the principle of the development are therefore the opportunities for enhancement of the existing site and the promotion of the second national park purpose.
78. The existing site comprises of a total of 186 caravan and camping pitches. At the moment, these pitches comprise of 37 static caravans and wooden lodges, 33 winter storage touring pitches, 51 touring pitches, 44 camping pitches, 15 pods, 2 yurts and 4 B&B rooms.
79. The site has developed in a piecemeal way over many years with a complex planning history. Much of the site as exists today has come about as a result of appeal decisions and some elements have not had the benefit of planning permission but have now become immune from enforcement action through the passing of time.
80. The layout of the site at the moment is erratic with a number of poor quality structures and very densely laid out areas of the site. There is also a very large amount internal road surfacing and other hard standing. Overall, the site is of pretty poor quality as a result of the ad hoc development and un-cohesive planning of the site. We consider that the site is not a particularly good asset to the National Park at the moment and that there is a good opportunity for enhancement, both visually and in terms of the benefit of the site to National Park.
81. The site does however benefit from being in a very well screened location due to the substantial mature planting around the site and, more significantly, the position of a large area of the site within the former quarry walls.
82. The application seeks permission to remove all the existing static caravans, touring pitches, wooden lodges and pods, and to provide a cohesive scheme that comprises of 78 lodges (these are static caravans by definition as they do not exceed the size limits, come in two pieces and can be transported on a vehicle), 7 cabins, 3 field barns and 2 tree houses. The scheme also includes the provision of 25 wooden camping pods on the existing camping area which does not contain any existing buildings or hard surfaced caravan pitches at the moment.
83. As well as being beneficial in terms of providing a cohesive and well-planned layout, the proposed scheme is also positive as it includes a meaningful reduction in the developed areas within the site.
84. At the moment, 2.45 hectares of the site are taken up by structures, hardstanding and roads. As a result of providing a better laid out site, the area taken up by structures,

hardstanding and roads would be reduced to 1.35 hectares. 1.1 hectares of the site would therefore be returned to footpaths, grass and open space.

85. This would be particularly beneficial in the central area of the site and the area within the quarry walls. At the moment, these areas feel very formally developed and engineered as a result of the extensive roads and hardstanding and the dense laying out of the static and touring pitches. Whilst the development introduces cabins and lodges on areas that don't have any existing buildings as they are touring pitches, the overall layout is less dense. For example, the number of pitches along the north eastern edge of the area within the quarry walls would be reduced from 21 as existing to 12 as proposed. Only a single access road with two centralised parking areas are proposed, as opposed to the extensive roads and parking spaces that clutter the site at the moment. This would allow a significantly more green and natural feel to the areas around the cabins and lodges and to the site overall.
86. The camping pods are reasonably simple wooden structures. They would contain toilet facilities but would not have kitchens or televisions etc. as sometimes found in this type of accommodation. The pods would be sited in a well screened wooded landscape and are considered to be in accordance with policy RT3 and emerging policy DMR1.
87. The scheme also initially proposed three new build field barn type buildings. Policy RT2 does not support the construction of new permanent buildings for holiday use and doing so would undermine the conservation benefits of converting historic field barns. The introduction of new build accommodation styled as field barns at this site would also be an alien feature that would not have been historically found here. As such, the 'field barns' are not acceptable in principle. The applicant has agreed to omit these from the scheme. In the interest of clarity, this would be confirmed through a condition being attached to any approval. The field barn type building that is proposed just to provide a replacement bat roost (and would not be used for any other purposes) has clear ecology benefits and is justified for this reason.
88. Overall, we consider that the scheme, excluding the three field barns, would result in clear improvement to the quality of the existing site and would deliver enhancement to the appearance of the site. The scheme accords with part D of Policy RT3.
89. It is still essential however that in order for the development to be acceptable in principle it must align with the second National Park purpose to promote understanding and enjoyment of the special qualities of the National Park and must avoid the creation of a holiday park site where visitors would be unlikely to leave the site during their stay.
90. This site is extremely well located for exploring the Peak District on foot and bicycle and without the need for private car use. The Tissington trail lies opposite the site to the north west and a public right of way runs through the site giving instant access to the public footpath network to the south. As well as providing opportunity for exploring and enjoying the scenic beauty of the National Park, this also means that the attractions, community facilities and amenities within local villages, particularly Tissington and Pariwch, are in easy reach without reliance on private car use.
91. A travel plan has been submitted which, if implemented, would help to ensure that the opportunities that the site offers for exploration of the National Park would be realised. Whilst the travel plan includes some means to encourage visitors not to bring cars to the site at all, it is accepted that realistically most visitors will arrive at the site by private car. However, the real benefit of the travel plan is the means to encourage visitors and staff to not be reliant on car use during their stay after they have initially arrived.

92. The travel plan includes a walking and cycling strategy and aims to deliver a modal shift that would both reduce car use and promote understanding and enjoyment of the National Park.
93. The strategy includes promotion of walking events, provision of walking and cycling routes through, into and out of the site, provision of route maps, a cycle to work scheme for staff, complementary cycle facilities and setting up of a bike pool scheme for both staff and visitor use.
94. The travel plan also includes a public transport strategy and two electric vehicle charging points. Visitors would be provided with route map and timetable information and subsidised bus vouchers.
95. These measures are all very welcome and would turn the desire to promote sustainable travel and enjoyment of the National Park into tangible means to actively encourage this. This again represents a significant benefit over and above the existing situation.
96. As well as actively encouraging visitors to explore the National Park, it is also essential that the level of the facilities within the site do not provide all the entertainment and amenities visitors need so that they have no reason to venture out.
97. The scheme includes the provision of a new facilities building. Care has been taken to limit the extent of the facilities that would be on offer. The existing facilities building includes a reception and small shop, admin and office space, kitchen, restaurant, bar and toilet facilities. The proposed replacement building would include the same facilities with the addition of only a drying room and dog wash area, which are specifically aimed at walkers and cyclists. As such, there would not be any increase in on site facilities to the extent of encouraging visitors not to leave the site. The proposed bar, restaurant and shop would be of similar size to the existing. The existing facilities building is poorly laid out with awkward staircases and small rooms. The proposed replacement facilities building would provide a better functioning area but, importantly, would not increase the extent of the facilities on offer (beyond those aimed at walkers and cyclists). It is considered that the extent of the new facilities building is in accordance with policies RT3 and HC5.
98. Whilst the scale of the facilities building is considered to be appropriate and acceptable for the site, it is important that it does not attract custom away from existing businesses within the nearby villages. As such, a condition restricting the use of the facilities building to being for overnight visitors only is necessary and reasonable. This would further ensure compliance with policies E2 and HC5.
99. It is therefore considered that the development would result in the creation of a site that much better promotes the understanding and enjoyment of the National Park than the existing site.
100. Although we consider the field barns to be unacceptable for the reasons outlined above, the rest of the scheme provides a good mix of different accommodation types. At the pre-application stage, the scheme initially proposed to redevelop the site only with lodges. This was concerning as it would have resulted in the most basic accommodation types (i.e. tent camping and touring caravans) being lost. These types of accommodation are important as they are often the ones that best encourage visitors to venture out to enjoy the area, thereby achieving the second National Park purpose. The applicant has worked proactively to address this issue and the scheme now proposes a good range of accommodation with cabins and lodges, camping pods and tent camping.

101. The development would also be likely to result in benefits to the rural economy in this part of the National Park. Policy E2 supports appropriate development of existing businesses in the open countryside. The supporting information sets out that the redevelopment would be likely to promote more year-round use of the site. Whilst the existing site is open all year already, the take up of touring caravan and camping use is likely to be low. Because the site would encourage more year-round use, there would be an increase in full-time employment. It is anticipated that the redeveloped site would employ 30 permanent members of staff, compared to the 5 seasonal staff that are employed at the moment. The development would also be likely to support existing businesses and community facilities in the locality, particularly given the efforts outlined above to encourage visitors to explore the National Park beyond the application site boundaries.
102. The economic benefits would not in themselves be a reason to approve the application if it were otherwise considered harmful to the National Park. The Core Strategy makes it clear that conservation of the National Park takes precedent. However, as the development is considered to be of benefit overall to the National Park, the economic benefits carry further weight in favour.
103. A letter of objection from a different holiday operator has raised concerns that there could be an adverse impact on business and employment at existing sites that are situated outside of the National Park boundary. There is no policy that seeks to afford protection to existing businesses outside of the National Park. In any case, the primary objective is to ensure the development enhances the appearance of the site and the enjoyment of the wider National Park by visitors. The concerns raised in this respect by the different holiday operator could not substantiate a reason for refusal. The proposal is in accordance with policy E2.
104. An exception to the general presumption against static caravans, chalets and lodges is clearly justified in this instance given the particular merits of the case and the character of the site. The principle of the development is acceptable.

#### Energy efficiency / carbon reduction

105. As well as the positive approach to encouraging sustainable travel methods as set out earlier, the applicant has also confirmed that the scheme would include solar photovoltaic panels on the new maintenance building. Air source heat pumps will also be used to heat the new facilities building. The development overall accords with the aims of policies CC1 and CC2. This is also a further indication that the proposal is for a sustainable form of development overall.

#### Impact of development on the Landscape

106. The site is well screened by a combination of the existing mature planting in and around the site and the topographical features, most notably the high walls of the former quarry.
107. The Authority's Landscape Architect has noted that the proposed development would enhance the appearance of the site from views within and outside of it. We considered this to be a significant benefit of the development as outlined above. A detailed Landscape and Visual Impact Assessment has been submitted.
108. The proposed new cabins and lodges would be sited within the former quarry floor and the central area of the site adjacent to it. These units would have no adverse visual impact from outside of the site.

109. The proposed camping pods would be within the camping field to the south western side of the site. This is a wooded area that also benefits from very good screening. This is a location where small and simple wooden camping pods are considered to be acceptable and in accordance with policy RT2 and emerging policy DMR1.
110. The proposed replacement maintenance and housekeeping building would occupy a similar position to the existing building and would also be of similar scale. This is again in a well-screened area of the site, set on a land level that is lower than the adjacent A515 road. As such, this would have little impact on the landscape character.
111. The proposed replacement facilities building would be visible in views from the south of the site. The design of the new building is discussed in more detail below. It is noted at this stage however that is a low-profile building with a curved roof. It is considered that the scale and form of the building would integrate comfortably within the site and its surroundings and would have no adverse landscape impact.
112. The proposal includes the removal of a number of existing trees. A scheme of replacement planting and additional landscaping has been submitted. The Authorities Ecologist has noted that the submitted scheme includes some non-native species so these should be altered for native specimens. Subject to a condition to ensure the details of the landscaping scheme are acceptable, it is considered that there would be enhancement to the current site in this respect.
113. The proposal therefore accords with Core Strategy policies GSP1, GSP2, GSP3, L1, L3 and HC1, saved Local Plan policies LC4 and LC8 and the National Planning Policy Framework.

#### Impact on Heritage Assets

114. There are no Listed Buildings within the site or within close proximity to the site boundaries. The vast majority of the existing structures within the site that are proposed to be demolished/removed are poor quality, modern and of no historic merit. The Authority's Senior Archaeologist has also noted that there is little of archaeological interest at the site.
115. The only building within the site that is of any historic interest is the existing facilities building. The Authority's Senior Archaeologist has noted that, from a cultural heritage perspective, it would be preferable to retain this building than demolish and replace it as is proposed. The building is part of a 19th century former farmstead. However, it has been significantly altered and extended and its historic character, value and significance are therefore limited. The building functions poorly at the moment due to levels changes within it. This makes accessibility difficult. Given that the significance of the building is very limited, we consider that the removal of the existing building is justified and acceptable.
116. The Authority's Senior Archaeologist has also raised concerns that the new field barns would be harmful as they would constitute an unacceptable pastiche of a historic type of building. We share this concern and agree that the field barns are not acceptable. As set out above, the field barns have been omitted from the scheme.
117. Overall, the development would not harm any heritage assets or the cultural heritage of the National Park. The proposal accords with policies L1, L3, LC4, LC15 and LC16 in this respect.

### Design Issues

118. The cabins and lodges, tree houses, pods and new toilet block are all simple structures that would have a temporary appearance. Subject to conditions to ensure the materials and colour finishes are appropriate, they do not raise any design concerns in this very well screened location.
119. The proposed replacement facilities building is the most significant element of the scheme from a design perspective. This involves replacing the existing facilities building, which is in a converted farm building so is of traditional appearance, with a contemporary new building.
120. The new building would be a single storey unit, which would allow good accessibility and circulation for visitors and staff. The building would have a curved green roof. The north elevation would be a limestone drystone wall, which would reflect the existing drystone walls in the adjacent fields. The north east and south west elevation walls would be constructed with reclaimed stone from the existing building that is to be demolished. The south east facing elevation would also have elements of solid reclaimed stone walling, but would be predominantly glazed with powder coated frames.
121. The general concept of a contemporary building that reflects the traditional character of the National Park by using natural stone is welcomed and the scale and the form of the buildings considered to work well with the site and surrounding landscape.
122. The heavily divided glazing to the south east elevation is however considered to be somewhat complicated and not in keeping with the clean and simple lines of the rest of the building. It is important that this elevation in particular looks appropriate as it is the elevation that would be seen from outside of the site. It is considered that an amended design with undivided glazed panels with stone columns in between would be more appropriate and the amendments should be secured by conditions.
123. The replacement maintenance and housekeeping building would have a simple and function appearance to its north west elevation. It is somewhat less simple to the south east elevation but this side would only be seen from within the site. The building would be clad in a combination of timber vertical boarding and profile sheeting. The building includes some very large rooflights, which are considered to be overly-large and appear incongruous. A condition to approve the details of more appropriate roof lights is recommended.
124. Overall, subject to conditions to secure design amendments and appropriate materials, the scheme as a whole is considered to be acceptable and in accordance with policy LC4.

### Highways

125. A letter of objection and a letter of comment have raised concern that the proposal would increase traffic movements in and around the site. This concern is noted.
126. However, the development would result in an overall reduction in the total number of accommodation units at the site. The proposal would also remove existing occurrence of visitors towing caravans to the site as there would be no touring pitches.
127. It must be acknowledged though that the reduction in accommodation units would be unlikely to result in a proportionate reduction in traffic movements, since one of the aims

of the redevelopment is to secure year round use whereas the existing site apparently has clear seasonal peaks at the moment.

128. The Highway Authority are of the view that there is no evidence to suggest that the development would result in any significant increase in traffic movements associated with the site and have raised no objections. Given this, along with the positive measures in the submitted travel plan to reduce use of private cars once visitors have arrived at the site, we consider that the development would not lead to any unacceptable or unsustainable increase in traffic movements around the site or in the National Park more generally.
129. As outlined further above, means to encourage sustainable travel have been integrated into the proposal.
130. The proposal therefore accords with policies LT11, LT18, T1, T2, T6, T7 and emerging policies DMT3, DMT5 and DMT6.

#### Ecology

131. The existing facilities building contains a maternity bat roost. Mitigation is therefore required for this loss of habitat. The proposal makes provision for this in the form of a new field barn type building that would be used only to create a replacement bat roost. Assessments and mitigation measures have also been submitted for great crested newts, birds and badgers. The Authority's Ecologist has raised no objections to the scheme but has noted that some of the mitigation measures require additional details to be approved before they are implemented. Subject to a condition for this, the development would not have an adverse impact on protected species.
132. The Authority's Ecologist has also noted that there is an opportunity to enhance the grassland in the area to the northern side of the site, which is within the applicant's ownership but not subject to any development proposals. This opportunity should be taken in order to enhance the ecology value of the site and a condition to secure this is recommended.
133. Subject to these conditions, the development accords with policies LC17 and LC18.

#### Amenity

134. A letter of comment has raised concerns that the proposed development would result in increased disturbance to nearby residents, particularly through the introduction of camping pods to the existing camping field. This concern is noted.
135. It must be acknowledged though that this is a well-established and large site. The camping field is already in regular use. The development would result in a reduction in the existing total number of accommodation units at this site. Given this, as well as the separation distances between the edge of the site and the nearest residential properties, we are of the view that there would be no material harm to the residential amenity of the occupiers of any nearby houses. Furthermore, the proposal would not result in excessive noise or other associated disturbance over and above the well-established existing use. The proposal accords with policies LC4 and LC21.

#### Flood Risk and Drainage

136. The site is within Flood Zone 1, so is at the lowest risk of flooding. The Environment Agency has raised no objections to the scheme. The Lead Local Flood Authority initially requested additional details about surface water drainage disposal. An updated drainage strategy has now been submitted which addresses this. It is considered that, subject to implementation of the drainage strategy, the scheme would not be at unacceptable risk of flooding and would not increase the risk of flooding outside of the site.

#### Land Contamination

137. The Environment Agency has requested a condition for a remediation strategy to be approved and then implemented if any land contamination is discovered during the development, Subject to such a condition, the proposal accords with policy LC24.

#### Other considerations

138. Letters have been received which state that there are existing leaseholders of some of the existing static caravans that are proposed to be removed and no mention has been made of this in the application.
139. This is a private matter between the individuals involved and the applicant. The resolution of this matter is not a material planning consideration and is outside of the control of the Authority.

#### Conclusion

140. The proposed development would deliver enhancement to the existing site in a manner that would be in line with the National Park purpose to promote understanding and enjoyment of the special qualities of the National Park. The development would have no adverse impact on the landscape character of the area. The development is recommended for approval.

#### Human Rights

Any human rights issues have been considered and addressed in the preparation of this report.

List of Background Papers (not previously published)

**Report Author**, Tom Shiels - Area Team Manager