

FULL APPLICATION - CHANGE OF USE OF LAND FROM TOURING PLOTS AND PLAY AREA TO THE STATIONING OF HOLIDAY LODGES/STATIC CARAVANS AND RECONFIGURATION OF PLAY AREA AT ASHBOURNE HEIGHTS CARAVAN PARK ASHBOURNE ROAD FENNY BENTLEY (NP/DDD/0125/0076/GG)

APPLICANT: MR MATTHEW PURDOM (PARK HOLIDAYS UK LTD)

Summary

1. The application seeks full planning permission for the change of use of land (Area 9) from touring/camping plots to the stationing of holiday lodges and static caravans, at what is an established caravan and camping site which also has such static developments. It is considered that the proposal can be accepted as an exception to the normal presumption against lodges and static caravans by virtue of the well-established and well screened nature of this part of the site, the fact that the units will replace a higher number of seasonal touring pitches and the proposals for landscape and biodiversity enhancement. The application is therefore recommended for approval.

Site and Surroundings

2. Ashbourne Heights is an established caravan and holiday park located to the west of the A515, approximately 700 metres north of Fenny Bentley. It has a mixture of static caravan pitches, lodges and touring pitches, together with buildings providing facilities for visitors to the site; these are in predominantly traditional buildings in the centre of the site. The site is accessed from the A515 and crosses over the Tissington Trail which runs immediately to the east of the site. The Park currently consists of a mixture of touring caravan and camping pitches, static caravans and lodges. There are a number of ancillary facilities on site, including, a shop, office, bar and swimming pool.
3. The application relates to part of the site known as Area 9. This field is located south of the facilities buildings within the holiday park. The site has an area of approximately 1ha. The total site ownership has an area of approximately 21.8ha, within which the “operational” site has an area of approximately 10.2ha. Following planting schemes carried out under previous planning permissions, the site is now relatively well screened in the landscape, with the exception of the southern boundary, which is relatively open.
4. The site lies within the Derbyshire Peak Fringe Landscape Character area, characterised as Village Farmlands on shale ridges. The site does not lie within the defined Natural Zone or within a Conservation Area. The surrounding landscape, and some parts of the site have historic ridge and furrow field systems, although none are scheduled as ancient monuments.

Proposal

5. The application is for the change of use of the land/site referred to as Area 9 (Greenacres) from touring/camping plots to stationing of holiday lodges and static caravans. The site is set to the south of the amenity buildings which serve the whole site and is towards the western side of the overall holiday park. The application proposes the siting of lodges and static caravans on a permanent basis, replacing the existing touring caravan use.
6. The area has a current potential capacity of around 28 no. plots for touring caravan/camping. The proposal is for 19 no. pitches, with the plans showing 14 no. static caravan units and 5 no. lodges. The new lodge/static accommodation is proposed to have a seasonal occupation restriction to preclude occupation from 16 January to 1 March to align with recent planning conditions elsewhere on the site.

7. It is proposed to relocate and alter the outdoor amenity area into a new play area with an option to move a larger amenity area to Area 7 in the future if need arises. The new amenity space to the north would have a fenced and hedged boundary adjacent to the access road for user safety. It is also proposed to relocate parking closer to the amenity buildings and increase the number of spaces from 8no. spaces to 10 (including 2no. EV charging spaces and 2no. DDA spaces). The new parking would be moved off the bend in the access road to provide improved safety for visitors. The proposals also include the addition of an attenuation pond to the west of the site and further landscaping.

RECOMMENDATION:

That the application be APPROVED subject to the following conditions:

- 1 Statutory 3 year commencement.**
- 2 In accordance with submitted plans and specifications.**
- 3 Occupancy to be short stay holiday accommodation only, maximum 28 days per person per calendar year, no occupancy permitted 16 January to 1 March in each calendar year.**
- 4 Submit details of the design and external appearance, including colour of the static caravans and lodges.**
- 5 Submit and implement a Landscape and Ecological Management Plan (LEMP)**
- 6 Submit and implement a woodland management plan.**
- 7 Implementation of statutory biodiversity net gain plan.**
- 8 Development in accordance with the Method Statement and Arboricultural Impact Assessment submitted by Corsican Associates CA Ref: CA21/054 05-12-2024.**
- 9 Implementation of landscape plan within first planting season following the siting or first occupation of any caravan or lodge.**
- 10 Vegetation removal and dismantling of any built structures shall be completed outside the main bird nesting season**
- 11 If any trees with bat roost potential require remedial works or felling, then a pre-works survey shall be completed**
- 12 No external lighting other than in accordance with approved details and lighting mitigation scheme.**
- 13 Detailed design and associated management and maintenance plan of the surface water drainage for the site.**
- 14 Detailed assessment to demonstrate that the proposed destination for surface water accords with the drainage hierarchy**
- 15 Scheme of Archaeological Works**
- 16 Parking plan to be approved and implemented**

- 17 Space provided for the parking of visitor's vehicles, laid out, surfaced and maintained. Implementation of EV charging.**
- 18 Submit and implement a travel plan**
- 19 Provide replacement play facility in accordance with details and time scale to be approved.**

Key Issues

- The principle of development
- The impact on the landscape character and special qualities of the National Park
- Drainage
- Sustainability
- Impact on amenity
- Trees, ecology and biodiversity

History

8. The site at Ashbourne Heights was originally known as Highfields Farm. It has a long and complex planning history, with numerous applications for both planning permission and certificates of lawful use, together with various enforcement issues, which are summarised below.
9. The original farm had been in a mixed use for agriculture and the siting of caravans dating back to the 1950s. In 1966 planning permission was granted for the siting of 14 touring caravans in the south west corner of the farm subject to an Agreement that an 'established' use would cease on the other fields. Further planning permissions were granted on other specific areas of land on the farm in the 1970s. In 1990 the farm was sold to a new owner who continued the mixed caravan site and agricultural use. In the 1990s, a number of planning permissions were granted for ancillary facilities at the site to serve the larger holiday caravan and camping park.
10. In 2004, 11 Lawful development applications (LDCs) were submitted which covered 11 specific areas which became known as Plots 1-11. At the time of these applications, it became clear that the primary use of Highfields Farm was now as a caravan and camping site and that any agricultural use had ceased. Of the 11 applications submitted in 2004, those relating to five were granted, either in whole or in part, and the applications relating to six plots were refused.
11. Around 2009 the name of the site was changed from Highfields Farm to Ashbourne Heights, and the then owners submitted a number of further LDC and planning applications relating to the use of individual areas within the site. The planning status of the site at that time was very complex, with different areas of the site authorised by a number of planning permissions and LDCs relating to changes of use on specific areas. In addition, there are a number of planning permissions relating to ancillary facilities for the general running of the site.
12. The current planning status as a holiday park was established by a Certificate of Lawful Existing use and Development (CLEUD). This was granted in December 2016 and consolidated the preceding complex planning history and confirmed the use of most of the site as a Holiday Caravan and Camping Site. The Certificate identifies specific areas of the site and the nature of the lawful use of those areas at that time, with seasonal use of most of the site as 1st March to 31st October, with some parts having an extended season

of 1st March to 16th January, and one part (the eastern field) having a shorter season of July and August.

13. In 2023, planning permission (NP/DDD/0523/0520) was granted for the change of use of land (Area 10) from touring/camping plots to stationing of holiday lodges and static caravans. It was concluded, on balance that the replacement of the seasonal touring units on that part of the site with permanent, seasonally occupied, units was acceptable as an exception to the normal policy presumption against permanent static caravans and lodges. This site is located on the northern boundary to the holiday park and the planning permission is currently in the process of being implemented.

Consultations

14. Fenny Bentley Parish Council:

- no response.

15. Environment Agency:

- site is located within flood zone 1 and have no fluvial flood risk concerns
- an ordinary watercourse which runs close to the site which the LLFA may hold data for
- no other constraints associated with the site which fall within the remit of the EA
- refer the applicant to an advisory note given that a connection to the foul drainage network is not possible on this site.

16. Lead Local Flood Authority (Derbyshire County Council):

- no objection subject to conditions.

17. Local Highway Authority (Derbyshire County Council):

- note that the on-site facilities (Area 9) is already lawfully established for camping use
- Transport Statement (TS) shows that the proposals would result in a negligible change in traffic on the surrounding highway network
- existing access to the public highway (A515) benefits from acceptable visibility splays within the highway limits
- application drawings show ample on-site parking and manoeuvring are to be provided
- no objection as appears to be no material impact on the public highway.

18. PDNPA Planning Policy

- **Peak District National Park Core Strategy (2011) - GSP1: Securing national park purposes and sustainable development**

Part C of GSP1 focuses on the balance between the two statutory National Park purposes. These are: -

- i) Conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park; and
- ii) Promoting opportunities for the understanding and enjoyment of the special qualities of the National Park

Both purposes carry equal weight, unless there is any conflict between the two; in which case the first purpose takes precedence; this is known as the Sandford principle.

Part C of GSP1 states: -

“Where there is an irreconcilable conflict between the statutory purposes, the Sandford Principle will be applied and the conservation and enhancement of the National Park will be given priority.”

- **Accordance with policy**

The application focuses on providing accommodation and facilities in line with the second National Park purpose. However, the impact of the delivery of the static accommodation elements of the scheme are in conflict with other National Park planning policies aimed at limiting the impact of static accommodation structures at camping and caravanning sites on the landscape. Therefore, the development is in conflict with part C of Policy GSP1.

- **Peak District National Park Core Strategy (2011) - Policy RT3: Caravans and camping**

Part B makes it quite clear that static caravans, chalets or lodges will not be permitted.

Part C requires that the 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.

Part D states 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.

- **Peak District National Park Development Management Policies (2019) - Policy DMR1: Touring camping and caravan sites**

Part A states that a small extension to an existing site (touring camping and caravanning 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.

Part B states that shopping, catering or sport and leisure facilities at camping and caravan sites will be permitted provided that they accord with the requirements of Part A and there is no significant adverse effect on the vitality and viability of existing facilities in surrounding communities.

Part C allows for the **exceptional** development of accommodation structures where these are small, simple, wooden pod structures in woodland locations with minimal landscape impact, or a single shepherd's hut where this can be located close to the facilities of a farmstead without harm to the natural or historic landscape.

- **Accordance with policy**

On balance, the relocation and refinement of amenity space is acceptable. The provision of additional static structures (lodges and caravans) is clearly contrary to Part B of Policy RT3. Whilst Part C of Policy DMR3 allows for the exceptional development of accommodation structures, the policy only allows for small scale development of this nature. The text accompanying Policy RT3 highlights the use of provision of camping pods where these are small, simple, wooden pod structures in woodland locations with minimal landscape impact, or of a single shepherd's hut where this can be located close to the facilities of a farmstead without harm to the natural or historic landscape.

The proposed provision of an additional 19 static units (comprising 5 lodges, 14 static caravans) is of a scale that is contrary to the intent of Policy DMR1. The cumulative effect of this development is also of concern. In 2023, the applicant was granted permission for the change of use in Area 10 from a touring camping and caravanning plot to the provision of 79 static units. Not only will this application see the provision of additional static units, it will see the loss of provision for touring camping and caravanning at an established site.

The Recreation and Tourism policies are therefore supportive of the proposed relocation and refinement of amenity space, but not of the proposed increased provision of static structures (lodges and static caravans).

- **Peak District National Park Core Strategy (2011) - T1: Reducing the general need to travel and encouraging sustainable transport**

This policy sets out the Plan's aim of encouraging modal shift and reducing the number of journeys by private car.

- **T2: Reducing and directing traffic**

Part F states that Travel Plans to reduce traffic movements and safeguard transport infrastructure will be required on appropriate new developments and encouraged on existing developments.

- **Peak District National Park Demand Management Policies (2019) - DMT6: Business parking**

Part A states that new or enlarged car parks will not be permitted unless a clear, demonstrable need can be shown.

Part B states that where planning permission is required, additional parking provision should be of a limited nature, whilst being appropriate to the size of the development and taking account of its location and the visual impact of parking.

- **The Peak District National Park Parking Standards**

The standards include a maximum standard for Caravan Sites of 1 space per caravan plus restaurant and bar facilities to comply with the Food and Drink standards and office requirements to comply with the Business standard.

- **Accordance with policy**

The current proposal includes the provision of two car parking spaces per unit. This is double the maximum number for this type of development within the Peak District National Park Parking Standards. Whilst some allowance should be made for staff and the provision of restaurant and bar facilities, the proposed number of spaces is clearly contrary to the Peak District National Park Parking Standards

The application includes a proposal to formalise and relocate the visitor car park and increase the number of spaces from 8 to 10 and to include the provision of two EV charging points, plus two spaces for disabled use. This is a modest increase and allows for better provision for those with a disability. Given the overall size of the site, this would be acceptable.

The Planning Statement indicates that a Travel Plan has been developed to accompany the application (paragraph 6.13); however, this does not appear to be the case. A development of this scale offers the opportunity to influence travel behaviours, particularly those of visitors to the site. People enjoying a leisure experience are known to be more amenable to new experiences, including modal shift. In the event of planning permission being granted, it should be conditional on the provision of a Travel Plan for both staff and visitors staying at the site.

19. PDNPA Ecology:

- BNG in order and not deemed significant, so it is considered the uplift can be secured by condition of the Soft Landscaping Plan and a Management Plan to be submitted to the authority

- standard recommendation regarding breeding birds
- satisfied with the clarification provided by email on 5th March 2025 and that no further surveys of the trees are required prior to determination
- if any trees with bat roost potential do require remedial works or felling, then a pre-works survey should be completed by a suitably qualified ecologist and comprise of either a detailed climbed inspection or an emergence survey or both.

20. PDNPA Landscape Architect

- proposals are well screened from many representative views shown in the LVIA by topography and existing tree cover
- increase in built form may be visible from distant views to the north-west and south (particularly in the winter)
- will be highly visible from the footpath PRow - WD36/20 Fenny Bentley which passes through the holiday park directly adjacent to the site
- proposed planting species are appropriate and the layout would provide an attractive setting and increased privacy for holiday makers in the new caravans and lodges
- however, proposals do not provide adequate mitigation/compensation for the loss of the large area of open space and increase in year round built form proposed and the impact on landscape character that this has and would be preferable for the large area of open space adjacent to the footpath to be retained and be incorporated into a stronger landscape enhancement scheme
- do not support this application.

21. PDNPA Tree Conservation Officer:

- comply in full to the Method Statement and Arboricultural Impact Assessment submitted by Corsican Associates CA Ref: CA21/054 05-12-2024
- condition for replanting replacement trees

22. PDNPA Archaeology:

- contrary to the statements submitted, the area of the proposed development has surviving ridge and furrow clearly visible in the Officer's site visit photos and in available LiDAR imagery for the site
- recommended that this is dealt with by a staged programme of archaeological investigation secured by condition.

Representations

23. Ramblers Derbyshire Dales Group has no objection providing that:

- i) Right of Way Fenny Bentley Footpath 20, which runs along part of the present access track, remains unaffected at all times, including the path surface, both during and after any development
- ii) It is noted that Bridleway 21 (the Tissington Trail), runs under the access track and FP 20. There is access to the Trail from the access track/FP 21. The safety of walkers accessing to and from the Trail should be considered
- iii) Consideration should be given to the safety of members of the public using the Right of Way both during and after the proposed works, including traffic calming measures such as low speed limits along the access track/FP 20
- iv) There should be no encroachment of the path. The DCC Rights of Way Team should be consulted over any RoW matters.

Main Policies

24. Relevant Core Strategy policies: GSP1, GSP2, GSP3, GSP4, DS1, L1, L2, L3, RT2, RT3, T1, T2, T7 & CC1.

25. Relevant Development Management policies: DMC3, DMC5, DMC11, DMR1, DMR3, DMT3 & DMT8.

National Planning Policy Framework:

26. The National Planning Policy Framework (NPPF) should be considered as a material consideration and carry particular weight where a development plan is absent, silent or relevant policies are out of date. In the National Park the development plan comprises our Core Strategy 2011 and the Development Management Policies 2019. Policies in the development plan provide a clear starting point consistent with the National Park's statutory purposes for the determination of this application. There is no significant conflict between prevailing policies in the development plan and the NPPF and the policies should be given full weight in the determination of this application.

27. Paragraph 189 of the NPPF states that great weight should be given to conserving and enhancing the landscape and scenic beauty in National Parks, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks.

Peak District National Park Core Strategy

28. 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.

29. Policy GSP2 states that opportunities for enhancing the valued characteristics of the National Park will be identified and acted upon. Proposals intended to enhance the National Park will need to demonstrate that they offer significant overall benefit to the natural beauty, wildlife and cultural heritage of the area. Development in settlements necessary for the treatment, removal or relocation of nonconforming uses to an acceptable site, or which would enhance the valued characteristics of the National Park will be permitted.
30. Policy GSP3 sets out development management principles and states 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.
31. Policy GSP4 states that to aid the achievement of its spatial outcomes, the National Park Authority will consider the contribution that a development can make directly and/or to its setting, including, where consistent with government guidance, using planning conditions and planning obligations.
32. Policy DS1 sets out the Development Strategy for the National Park. DS1.C. sets out the forms of development that are acceptable in principle in the countryside outside of the Natural Zone. There is no scope for the erection of new housing here other than as part of development needed to secure effective conservation and enhancement.
33. Policy L1 states that development must conserve and enhance valued landscape character and valued characteristics, and other than in exceptional circumstances, proposals in the Natural Zone will not be permitted.
34. Policy L2 states that development must conserve and enhance any sites, features or species of biodiversity importance and where appropriate their setting.
35. Policy L3 states that development must conserve and where appropriate enhance or reveal the significance of archaeological, architectural, artistic or historic assets and their settings, including statutory designations and other heritage assets of international, national, regional or local importance. Other than, in exceptional circumstances development will not be permitted where it is likely to cause harm to the significance of any cultural heritage asset.
36. Policy RT2 of the Core Strategy relates to self-catering accommodation and advises that new build holiday accommodation will not be permitted, albeit it is advised that minor developments which extend or make quality improvements to existing holiday accommodation will be permitted.
37. 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. Part B makes it clear that static caravans, chalets or lodges will not be permitted. Part C requires that the 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. Part D states 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.

38. Policy T1 sets out the Plan's aim of encouraging modal shift and reducing the number of journeys by private car. Part F of Policy T2 states that Travel Plans to reduce traffic movements and safeguard transport infrastructure will be required on appropriate new developments and encouraged on existing developments. Part B of Policy T7 states that residential parking and operational parking for service and delivery vehicles will be the minimum required for operational purposes, taking into account environmental constraints and future requirements.
39. Policy CC1 states that development must make the most efficient and sustainable use of land, buildings and natural resources, taking into account the energy hierarchy and achieving the highest possible standards of carbon reductions and water efficiency.

Development Management Policies

40. The most relevant Development Management Plan policies are DMC3, DMC5, DMC11, DMR1 and DMT3.
41. Policy DMC3 states that, where development is acceptable in principle, it will be permitted provided that its detailed treatment is of a high standard that respects, protects and where possible enhances the natural beauty, quality and visual amenity of the landscape, including the wildlife and cultural heritage that contribute to the distinctive sense of place.
42. Policy DMC5 requires that planning applications for development affecting a heritage asset, including its setting must clearly demonstrate:
- (i) its significance including how any identified features of value will be conserved and where possible enhanced; and
 - (ii) why the proposed development and related works are desirable or necessary.

Development of a designated or non-designated heritage asset will not be permitted if it would result in any harm to, or loss of, the significance, character and appearance of a heritage asset (from its alteration or destruction, or from development within its setting), unless, for non-designated heritage assets, the development is considered by the Authority to be acceptable following a balanced judgement that considers the significance of the heritage asset.

43. Policy DMC11 relates to safeguarding, recording and enhancing nature conservation interests and aims to achieve net gains to biodiversity or geodiversity as a result of development.
44. Policy DMR1 (Touring camping and caravan sites) states:
- A. 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.
 - B. Shopping, catering or sport and leisure facilities at camping and caravan sites will be permitted provided that they accord with the requirements of Part A and there is no significant adverse effect on the vitality and viability of existing facilities in surrounding communities.
 - C. Exceptionally, the development of structures may be permitted where these are small, simple, wooden pod structures in woodland locations with minimal landscape impact, or a single shepherd's hut where this can be located close to the facilities of a farmstead without harm to the natural or historic landscape

45. Policy DMR3 relates to self-catering accommodation and states that, where self-catering accommodation is acceptable in such locations, its use will be restricted to no more than 28 days per calendar year by any one person.
46. Policy DMT3 sets out that development will only be permitted where a safe access that is achievable for all people can be provided in a way that does not detract from the character and appearance of the locality. Regard also needs to be given to the Authority's parking standards.

Assessment

Principle of proposed development

47. The proposed development would result in the loss of 28 touring caravan pitches and their replacement with 19 lodge and static caravan pitches (5 lodges and 14 static units) which would be on site all year round, but with restricted occupancy so that they would be vacant for part of January and most of February and March. They would be permanent structures, with their own facilities, although they would also have access to the wider site facilities.
48. Policy RT3 B explicitly states that static caravans, chalets or lodges will not be permitted. However, the supporting text says that, exceptionally, static caravans, chalets or lodges may be acceptable in locations where they are not intrusive in the landscape. RT3 therefore makes a general and strong presumption against this type of development. However, there is acknowledgement in the supporting text to this policy that there may be sites suitable for such development in exceptional circumstances.
49. The proposal is therefore in conflict with policy RT3 unless it can be demonstrated that there are exceptional reasons for approval.
50. In this instance, the site is a well-established holiday park. The proposed units would replace a number of seasonal touring pitches; the Authority has no control over the colour or more general appearance of these units. It is also pertinent that the current application includes additional planting and landscaping proposals that would serve to further screen the area of the site, as well as an opportunity to secure existing screening related to the proposed development – providing an opportunity to materially reduce the impact that the site as a whole in the landscape.
51. The approval of this application would not set a precedent for further approvals on the site because this part of the site is one of the best screened areas and has a lawful use for a relatively long season for 28 touring units.
52. On this basis, it is concluded that the development would not be intrusive in the landscape. As such, subject to consideration of the details of the scheme, it is concluded to represent a case where an exception to policy RT3 B may be appropriate.
53. If approved, a 28-day holiday occupancy restriction would be imposed on the units in accordance with policy DMR2 and to prevent occupancy as permanent dwellings contrary to adopted housing policy.

Landscape impacts

54. Ashbourne Heights is an established, large-scale holiday park, having developed and expanded over many years. As a result of landscaping, the site is well screened and is not highly visible from the surrounding landscape. A detailed assessment of potential visual impact has been carried out and submitted with the application as a Landscape and Visual Impact Assessment (LVIA). This concludes that:

The receiving landscape, although of potentially high sensitivity, is visually contained such that the development of the proposed areas for static caravans could be successfully incorporated without any long-term detrimental effects on the local or wider landscape character.

55. The application includes additional landscaping to further reinforce that which exists with and around the wider site. Views from outside the site are limited by the topography and the site being well screened. The LVIA conclusions are considered to be accurate and it is accepted that the change from touring plots to static/lodge accommodation would not materially increase the visual impact of the site or affect the wider landscape setting of the site. As this report sets out, the site is well established, with good screening, but the application would result in additional screening and biodiversity, with a reduction in the number of units, albeit with the new units being permanent and generally larger than a standard touring unit.
56. A public footpath crosses through the holiday park and directly to the east of the application site along the access road. This would not be directly affected or obstructed by the proposal, but its users will have a slightly different experience from walking adjacent to a site with lodges and static caravans rather than the current touring caravans/tents or open space outside of the touring/camping season.
57. The Authority's Landscape Architect advises that the proposals do not provide adequate mitigation/compensation for the loss of the large area of open space and increase the year round built form. To this end, it is advised that it would be preferable for the large area of open space adjacent to the footpath to be retained and be incorporated into a stronger landscape enhancement scheme. However, this does not mean that the space is so important, in its contribution within the site, to the landscape experience; the site still remains part of a substantial holiday park through which walkers will be passing. The footpath also passes through other parts of the site where there are permanent units and the site has the character of a well-established holiday park, with areas of managed grass and other facilities such as play areas, parking, access roads and amenity buildings.
58. Whilst the view of the Landscape Architect is acknowledged, this does not mean that the proposals are unacceptable when considered in the balance. Overall, the proposal would not result in a significant change to the experience of footpath users who would already be well aware of crossing an established site.
59. Taking these various issues and considerations into account, it is concluded, on balance, that the replacement of the seasonal touring units on this part of the overall site with permanent, but seasonally occupied units, is acceptable in this specific case. The site is relatively large and this part of it is well screened by the existing structures on the wider site. Overall, the holiday park would still offer a range of accommodation and pitches on the site, with the eastern field still being available for short season touring and camping.
60. An approval would also provide an opportunity for additional landscape and biodiversity enhancement that would conserve the valued landscape character and valued characteristics of this part of the National Park and provide opportunities for enhancement, in accordance with Policies GSP1, GSP2, and L1 of the Core Strategy.

Economic impact

61. The supporting Planning Statement includes a detailed section on economic impact and market demand, providing data on the number of sites, their ownership and the contribution they make to the economy. The Planning Statement says that this

demonstrates the strong demand for static holiday/lodge caravan pitches in England and the significant economic contribution their visitors make.

62. It is acknowledged that the proposal would upgrade the offer the site can make to visitors and encourage longer stays throughout the year with the potential for increased spending within the National Park while still retaining a key touring element for more transient visitors. It is accepted that the development would have economic benefits which is a material consideration.
63. However, the Authority's' duty to foster the social and economic wellbeing of the local communities is secondary to the statutory purposes of the National Park. Therefore, if the development were found to be harmful to the statutory purposes this benefit would not be an overriding justification.

Archaeology impacts

64. The area of the proposed development has surviving ridge and furrow clearly visible in the site visit photos and in available LiDAR imagery for the site. They are part of a wider field system, with earthworks in many of the fields of the holiday park and beyond. Their width indicates that they are likely to be of medieval origin, resulting from ploughing of the land over many centuries and have archaeological and historic interest, reflecting medieval farming practices and the development of the landscape and have intrinsic landscape interest.
65. They ridge and furrow have been impacted by previous infrastructure, such as areas of hard standing and the access roads but, nevertheless, this area of ridge and furrow is considered to be of local significance in its own right. The survival of ridge and furrow earthworks demonstrates that this land has not been ploughed or significantly disturbed in modern times, thus that there is potential for earlier archaeological remains to survive. Any such remains would be considered non-designated heritage assets of archaeological interest, but the nature, extent or level of significance of any such remains is unknown.
66. Considering the archaeological context of the site, it is estimated that the risk of any surviving remains being features of high or very high (national) significance would be relatively low and, due to the fact that there have been previous impacts in this area, both with respect to medieval agriculture and later activity, it is unlikely the any surviving earlier remains would be entirely undisturbed or exceptionally well preserved. The groundworks required for the development will cause harm to the ridge and furrow earthworks, resulting in their loss, and on the potential for previously unknown and unrecorded archaeological remains and features that survive below the ridge and furrow earthworks.
67. With respect to impact on the ridge on furrow earthworks, this is likely to represent complete loss of a heritage asset of local significance, but this is a low magnitude of impact. With respect to potential features below the ridge and furrow, this is currently an unknown potential for remains of an unknown significance. For this reason, previous archaeological advice on other areas of the holiday park with the same interest was that pre-determination assessment was required because, with the information available, it was not possible to assess the impact of the proposed development on any potential buried archaeological remains below the ridge and furrow, and this remains the case and evaluation of this, using non-intrusive methods, was recommended. However, this is not possible because the existing electrical hook ups that appear to be across the site and, it is assumed, are also present across Area 9, making it an unviable method.
68. Furthermore, both magnetometry and resistivity geophysical survey do not respond well to carboniferous limestone geologies and have delivered poor results elsewhere on the

limestone plateau. Therefore, this method of evaluation is not the answer for this site. The best way to evaluate this would be by trial trenching.

69. The ground disturbance that trial trenching will require will itself destroy the ridge and furrow earthworks within the footprint of the trenches, but this would be the result of the development if implemented. Therefore, it is recommended that the trenching to take place, if permission is granted, could be post-determination rather than pre-determination in this instance.
70. Given the above, it is recommended that this is dealt with by a staged programme of archaeological investigation secured by condition. This should start with evaluation by trial trenching across the development area, which will inform any subsequent mitigation required. Should the results of the evaluation be negative, then no mitigation will be required. This can be secured by planning condition.

Highway matters and sustainable travel:

71. Access to the proposed development would be via the existing access off the A515 and through the existing site. The Highway Authority does not object to the application. The application is accompanied by a detailed Transport Assessment. This concludes that the site currently has permission for around 271 plots for touring/static caravans, lodges and tent pitches (131 touring caravan/tent pitches and 140 static caravans).
72. The applicant proposes to convert the existing site (Area 9) from some 28 touring caravan pitches (17 grass and 11 hardstanding) to allow for 19 holiday lodges/static pitches; this would be a net reduction of 9 units and likely to reduce the potential vehicle numbers. The redevelopment would also remove an element of caravans being towed into/out of the site access along the A515 and instead be replaced by cars visiting the static caravans/lodges. This would therefore represent a betterment to the operation of the existing access and surrounding junctions on the public highway network.
73. The proposed development includes 2 parking spaces per unit. In their consultation response the Authority's policy team state:
74. *'The current proposal includes the provision of two car parking spaces per unit. This is double the maximum number for this type of development within the Peak District National Park Parking Standards. Whilst some allowance should be made for staff and the provision of restaurant and bar facilities, the proposed number of spaces is clearly contrary to the Peak District National Park Parking Standards'*
75. No justification has been put forward to deviate from adopted parking standards. It is therefore recommended that if permission is granted a condition be imposed for final levels of parking provision to agreed, notwithstanding the approved plans.
76. It is proposed to relocate parking closer to the amenity buildings and to increase the number from 8 to 10 with two of these having EV charging points. This will improve safety by moving parked vehicles off the bend in the road where they are currently located.
77. Given the above, the Local Highway Authority has advised the application drawings show ample on-site parking and manoeuvring are to be provided and raises no objection as there appears to be no material impact on the public highway.
78. A development of this scale offers the opportunity to influence travel behaviours, particularly those of visitors to the site. People enjoying a leisure experience are known to be more amenable to new experiences, including modal shift. In the event of planning

permission being granted, this should be conditional on the provision of a Travel Plan for both staff and visitors staying at the site.

Public rights of way

79. Fenny Bentley FP 20 runs immediately to the east of the application site and it is important that this remains unaffected at all times, including the path surface, both during and after any development. Consideration will also need to be given to the safety of members of the public using the Right of Way during the proposed works and any encroachment of the path would need consultation and permission with/from the DCC Rights of Way Team. Given the above, these points be attached as an informative to the Applicant on the decision notice should planning permission be granted.

Climate change and carbon reduction measures:

80. The Design and Access Statement says that the new lodges and static caravans will be insulated to current requirements. LED energy efficient light fittings will minimise energy consumption, any external lighting will be aimed downwards and be switched off when not in use to minimise light pollution. Permeable gravel footpaths will help reduce water run-off from the site.
81. Water efficient sanitary-ware will further reduce the reliance on mains water. Sustainable and local materials will be used wherever possible, supporting local businesses and minimising transportation of materials. Any excavated material from site will remain on site and be redistributed. Although these are fairly generic statements and any units are likely to be manufactured off site, given the nature of the development, this is considered to be acceptable.
82. As stated earlier in the report electric vehicle charge points are proposed in the parking area and this is welcomed.

Drainage and flooding

83. The Lead Local Flood Authority (Derbyshire County Council) requested further information and has no objection to the proposals subject to conditions with respect to:
- a detailed design and associated management and maintenance plan of the surface water drainage for the site;
 - demonstrating that the proposed destination for surface water accords with the drainage hierarchy; and
 - details indicating how additional surface water run-off from the site will be avoided during the construction phase.

Reduction and relocation of play space area

84. The applicant has advised that the existing play area is not used as frequently as it was designed for and is an inefficient use of space. The development would see the retention of open space at the centre of Area 9 and a newly formed play area would be sited near to the existing amenity buildings. These amenity buildings are large and one of which includes a swimming pool for the users of the site.
85. A sense of openness at the site would be retained due to the undeveloped meadow to the southern end. The site operator would also need to continue to comply with the terms of the site licence to ensure sufficient living standards for occupiers. The Applicant has advised that there is an option to increase amenity space in Area 7 in the future if need arises; this may need to be assessed through the submission of a further planning application.

Impact on residential amenity

86. The nearest neighbouring property is a farm to the south, which also has a camping and caravanning use. As there is a certain amount of activity with the coming and going of vehicles and caravans, and as the site could accommodate more persons as such, it is considered that there would be no further impact on the privacy and amenity of that property and the proposal accords with policies GSP3 and DMC3 in this respect.

Trees, Ecology and biodiversity net gain

87. The Authority's Ecologist has considered the proposals and advises that the Biodiversity Net Gain (BNG) proposals are acceptable and that the proposed uplift can be secured with a condition of the Soft Landscaping Plan and a Management Plan to be submitted to the Authority. It is advised that the standard condition relating to breeding birds is attached to any grant of planning permission.
88. Some concern was raised with regards to the removal of trees and the potential impact on protected species. The Applicant has advised that trees may need to be felled as part of any woodland management at the site, although, this is no longer required for BNG commitments. It is advised that, if any woodland management is carried out in the future, it will involve the clearance of only very young immature trees as the woodland is currently heavily overstocked. If any trees with bat roost potential do require remedial works or felling, then a pre-works survey would be completed by a suitably qualified ecologist and comprise of either a detailed climbed inspection or an emergence survey or both.
89. The works would then be completed under ecological supervision; these assurances are acceptable. The Tree Officer was also consulted and raised no objection subject to conditions to ensure the works comply with the submitted Method Statement and Arboricultural Impact Assessment and that replacement trees shall be provided.
90. Regarding the requirement for a lighting mitigation scheme, the Applicant is happy to accept an appropriate planning condition requiring approval by the Authority in order to identify sensitive habitats/areas and that this is an established process followed on other holiday parks within Park Holidays' portfolio.

Conclusion

91. It is concluded, on balance, that in this case the replacement of the seasonal touring units and camping on this part of the site with permanent, seasonally occupied units is acceptable as an exception to the normal policy presumption against permanent static caravans and lodges. As noted above, the site is relatively large and this part of it is well screened being set at the heart of the site. It would still offer a range of accommodation and pitches on the site, thus contributing to the enjoyment of the National Park.
92. The approval of this application would not set a precedent for further approvals on the site because this part of the site is one of the best screened and the site has a lawful use for a relatively long season. An approval would provide an opportunity for additional landscape and biodiversity enhancements and also provides an enhancement to the quality of the tourism provision at this site.
93. There are no other site specific reasons for refusing the application.

Human Rights

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

List of Background Papers (not previously published)

95. Nil

96. Report Author: Gareth Griffiths – Planner.