

A01

F/TH/23/1559

PROPOSAL: Change of use of land to form an extension of existing caravan park to accommodate 110 caravans and associated parking, bin stores, hardscaping and landscaping

LOCATION: Preston Caravan Site Preston Road RAMSGATE Kent CT12 5AR

WARD: Thanet Villages

AGENT: Mr Andrew Evans

APPLICANT: Mr Godden

RECOMMENDATION: Approve

Subject to the following conditions:

1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

GROUND:

In accordance with Section 91 of the Town and Country Planning Act 1990 (as amended by Section 51 of the Planning and Purchase Act 2004).

2 The development hereby permitted shall be carried out in accordance with the following approved plans drawing nos: 23.1768.PL003 Revision C (received 01/03/24), 23.1768.PL004 Revision A, 23.1768.PL005 Revision A, 23.1768.PL006, 23.1768.PL007 Revision A (received 15/02/24), 23.1768.PL011 (received 15/02/24) and Figure 06 Rev C.

GROUND

To secure the proper development of the area.

3 The caravan holiday homes (static and touring) shall be occupied for holiday purposes only. No caravan (static or touring) shall be occupied as a person's sole or main place of residence.

GROUND

To safeguard against permanent residential use of the units to ensure the continued availability of holiday accommodation in the area, in accordance with Thanet Local Plan E08.

4 The operators of the caravan park shall maintain an up-to date register of the names of all owners/ occupiers of individual caravan holiday homes (static and touring) on the site, and of their main home addresses and shall make this information available at all reasonable times to the Local Planning Authority.

GROUND

To safeguard against permanent residential use of the units to ensure the continued availability of holiday accommodation in the area, in accordance with Thanet Local Plan policy E01.

5 The area shown on the approved plan for vehicle parking and manoeuvring areas, shall be kept available for such use at all times and such land and access thereto shall be provided prior to the first occupation of each phase of the development hereby permitted.

GROUND

To provide satisfactory off street parking for vehicles in accordance with Policy TP06 of the Thanet Local Plan and the advice contained within the NPPF

6 The development hereby permitted shall incorporate measures to prevent the discharge of surface water onto the highway.

GROUND

In the interests of highway safety, in accordance with the advice contained within the NPPF.

7 Prior to the first occupation of each phase of the development hereby permitted details the cycle parking as shown on the approved plans shall be provided and thereafter retained.

GROUND

To promote cycling as an alternative form of transport, in accordance with Policy TP03 and SP43 of the Thanet Local Plan

8 Prior to the commencement of any development on site details to include the following shall be submitted to and approved by the Local Planning Authority and should be carried out in accordance with the approved details.

- (a) Routing of construction and delivery vehicles to / from site
- (b) Parking and turning areas for construction and delivery vehicles and site personnel
- (c) Timing of deliveries
- (d) Provision of wheel washing facilities
- (e) Temporary traffic management / signage

GROUND

In the interests of highway safety and neighbouring amenity, in accordance with Policy QD03 of the Thanet Local Plan and the advice contained within the NPPF.

9 Prior to the first use of each phase of the development hereby approved, the Electric vehicle charging points (EVCP) as shown on the approved plans shall be provided. The EVCP shall be maintained and kept in good working order thereafter as specified by the manufacturer.

GROUND

To protect air quality, in accordance with Policy SE05 of the Thanet Local Plan and the advice as contained within the NPPF.

10 No development shall take place on each phase until details of the means of foul and surface water disposal, including details of the implementation, management and maintenance of any proposed Sustainable urban Drainage Systems, have been submitted to and agreed in writing by the Local Planning Authority. The development shall be carried out in accordance with such details as are agreed and thereafter maintained.

GROUND

To protect the district's groundwater, and to ensure the development is served by satisfactory arrangements for the disposal of surface water, in accordance with Policies SE04 and CC02 of the Thanet Local Plan and advice contained within the NPPF.

11 Prior to commencement of each phase of works (including site clearance), a construction ecological management plan (CEMP - biodiversity) will be submitted to and approved in writing by the Local Planning Authority. The CEMP - biodiversity will be based on the recommendations in section 11 of the Native Ecology (November 2023) Preliminary Ecological Appraisal report and include the following:

- Risk assessment of potentially damaging construction activities;
- Identification of 'biodiversity protection zones';
- Use of protective fences, exclusion barriers and warning signs.
- Practical measures (both physical measures and sensitive working practises) to avoid or reduce impacts during construction (may be provided as a set of species or habitat-specific method statements);
- The location and timing of sensitive works to avoid harm to biodiversity features;
- The times during construction when specialist ecologists need to be present on site to oversee works;
- Details of any necessary protected species licences and reference to any other relevant documents e.g., Arboricultural Method Statement;
- Timetable for implementation demonstrating that works are aligned with the proposed phasing of development;
- Responsible persons and lines of communication;
- The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person, and;

The approved CEMP - biodiversity will be adhered to and implemented throughout the construction period in accordance with the approved details.

GROUND

In the interests of the visual amenities of the area, biodiversity enhancement, and to adequately integrate the development into the environment in accordance with Policies QD02, SP30 and GI04 of the Thanet Local Plan

12 Prior to commencement of each phase of works (including site clearance), an Ecological Design Strategy (EDS) will be submitted to, and approved in writing by, the Local Planning Authority. The EDS shall demonstrate (can be qualitatively following judgement by

a suitably qualified ecologist) how the development will produce a biodiversity net gain. The EDS shall include the following:

- Purpose and conservation objectives for the proposed works;
- Review of site potential and constraints;
- Detailed design(s) and/or working method(s) to achieve stated objectives;
- Extent and location/area of proposed works on appropriate scale maps and plans;
- Type and source of materials to be used where appropriate, e.g. native species of local provenance;
- Timetable for implementation demonstrating that works are aligned with the proposed phasing of development;
- Persons responsible for implementing the works;
- Details of initial aftercare and long-term maintenance (including management prescriptions for achieving aims and objectives, and a work schedule capable of being rolled forwards); and
- Details for monitoring and remedial measures.

The EDS shall be implemented in accordance with the approved details and all features shall be retained thereafter.

GROUND

In the interests of the visual amenities of the area, biodiversity enhancement, and to adequately integrate the development into the environment in accordance with Policies QD02, SP30 and GI04 of the Thanet Local Plan

INFORMATIVES

Please be aware that your project may also require a separate application for Building Control. Information can be found at:

<https://www.thanet.gov.uk/services/building-control/> or contact the Building Control team on 01843 577522 for advice.

It is important to note that planning permission does not convey any approval to carry out works on or affecting the public highway.

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be a given because planning permission has been granted. For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens that do not look like roads or pavements but are actually part of the public highway. Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have highway rights over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process.

Should the development be approved by the Planning Authority, it is the responsibility of the applicant to ensure, before the development is commenced, that all necessary highway approvals and consents have been obtained and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority. The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissionsand-technical-guidance>. Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181

SITE, LOCATION AND DESCRIPTION

The application relates to land adjacent to the existing caravan site at Preston Park. The site comprises some 4.25 hectares of existing agricultural land immediately to the north east of the existing caravan park and to the east of Preston Road; although not immediately abutting it. The extension is to accommodate up to 110 caravans, and associated parking provision.

The site would extend some 170 metres to the north parallel to, although not next to, Preston Road from the existing boundary of the site, and extend back to the public footpaths to the north and east before coming diagonally across to link in with what is currently the rear beyond of the caravan park. An area of agricultural land is situated to the west, which extends up to Preston Road, beyond which are a solar park, dwellings and a cattery.

The site is located at the edge of Manston Village at the boundary between the existing caravan park and agricultural land. Although the area is not heavily residential in nature, there are a significant number of properties located on the southern side of Spratling Street and eastern side of Preston Road.

RELEVANT PLANNING HISTORY

F/TH/16/0448 - Use of land as a caravan park without compliance with condition (ii) of TH/86/1085 Condition 1 of F/TH/93/0788 condition 2 of F/TH/02/0233 and condition 2 of F/TH/03/0976 to allow year round occupation. Granted 02/05/2016

F/TH/04/1495 - Variation of condition 11 of TH/02/0233 to allow up to 191 caravans to be parked on site. Granted 08/08/2005

F/TH/03/0976 Variation of planning consent reference F/TH/02/0233 to allow opening from 1st March one year until 17th January the next. Granted 22/10/2003

F/TH/02/0233 - Extension of existing caravan park (2.66 Hectares) Refuse 02/10/2002. Allowed on appeal

PROPOSED DEVELOPMENT

Full planning consent is sought for the change of use of land to form an extension of the existing caravan park to accommodate 110 caravans and associated parking, bin stores, hardscaping and landscaping.

There will be 1 car parking space adjacent to each caravan. At the new access point into the extension area there is a bin storage area, visitor parking - 12 spaces and space for commercial parking - 10 spaces. In addition around the site there are additional areas of visitor parking giving a total of 21 spaces and 27 of these will have Electric vehicle charging points. Each caravan will contain a storage area for bicycles which will be secure, covered on the plot.

Additional soft landscaping screens and landscape buffer (wildflower meadow -0.87 acres) are also proposed as part of the scheme. It is indicated that the currently proposed development is proposed to be undertaken in a series of five phases, according to the demand generated for the units and implemented over the course of a number of years, but the screen planting to the entire site will be carried out prior to the occupation of the first phase.

DEVELOPMENT PLAN POLICIES

Thanet Local Plan

SP04 - Economic Growth

SP24 - Development in the Countryside

SP26 - Landscape Character Areas

SP27 - Green Infrastructure

SP29 - Strategic Access Management and Monitoring Plan (SAMM)

SP30 - Biodiversity and Geodiversity Assets

SP43 - Safe and Sustainable Travel

SP44 - Accessible locations

E05 - Sequential and Impact Test

E08 - Self Catering Tourist Accommodation

E16 - Best and Most Versatile Agricultural Land

QD02 - General Design Principles
QD03 - Living Conditions
SE03 - Land affected by Contamination
SE04 - Groundwater Protection Zone
TP02 - Walking
TP03 - Cycling
TP06 - Car Parking
CC01 - Fluvial and Tidal Flooding
CC02 - Surface Water Management
SE06 - Noise Pollution

NOTIFICATIONS

Letters were sent to adjoining occupiers, a site notice posted close to the site and the application publicised in a local newspaper.

Four representations were received. The concerns can be summarised as follows:

- Extra traffic and parking
- Traffic congestion
- Spratling Street is a narrow road
- More residents in the village
- Increased pollution
- Increased noise
- Development on farmland will bring Manston closer to Westwood
- Loss of agricultural land
- Overbearing and loss of outlook
- Impact on rural character
- Impact upon ecology
- Residents live here for ten months and go on holiday for two months

Manston Parish Council: 'Members of Manston PC wish to object to this application based on the grounds below and have requested this application be called into committee.

1. Overdevelopment and Density:

The proposed development of 110 caravans appears excessive and could lead to overdevelopment, negatively impacting the character and quality of the surrounding area. The density of caravans may create an overcrowded and aesthetically displeasing environment.

2. Traffic and Parking Concerns:

The increase in caravans will likely result in a surge in vehicular traffic, potentially causing congestion and safety hazards. The associated parking provision may not adequately address the demand, exacerbating on-street parking issues and compromising road safety.

3. Environmental Impact:

The scale of the development poses risks to the local environment. The increased demand for water, waste disposal, and other services may strain existing infrastructure, leading to environmental degradation and compromising the sustainability of the area.

4. Loss of Green Space and Landscaping:

The proposed hardscaping and landscaping could result in the loss of valuable green space. Preserving such areas is crucial for maintaining biodiversity, providing recreational spaces, and enhancing the overall visual appeal of the locality.

5. Impact on Local Amenity:

The size and nature of the development may have adverse effects on the amenity of nearby residents. Noise, light pollution, and the sheer volume of occupants may compromise the peaceful enjoyment of their properties.

6. Community Infrastructure:

It is essential to assess whether the local infrastructure, such as schools, healthcare facilities, and public services, can adequately support the increased population resulting from the proposed development."

CONSULTATIONS

Environment Agency: Due to the scale, nature and setting of this proposal and the supporting information submitted, we have assessed this proposal as low risk. We therefore do not have any specific comments to add.

Southern Water: This Planning Application is located within the Source Protection Zone 2 of our Manston 2 groundwater abstraction. Southern Water do not object to this planning application on the condition that hydrocarbon pollution prevention is included in the Surface Water drainage design, prior to run-off entering soakaway features that will infiltrate to ground. Southern Water will require review of this revised drainage design and/or drainage strategy.

The attached plan shows that the proposed development will lie over an existing public water trunk main, which will not be acceptable to Southern Water. The exact position of the public apparatus must be determined on site by the applicant before the layout of the proposed development is finalised.

It might be possible to divert the water trunk main, so long as this would result in no unacceptable loss of hydraulic capacity, and the work was carried out at the developer's expense to the satisfaction of Southern Water under the relevant statutory provisions.

- The 450 mm water trunk main requires a clearance of 6 metres on either side of the water trunk main to protect it from construction works and to allow for future access for maintenance.
- No excavation, mounding or tree planting should be carried out within 6 metres of the external edge of the public water trunk main without consent from Southern Water.
- No soakaways, swales, ponds, watercourses or any other surface water retaining or conveying features should be located within 5 metres of a public water trunk main.
- All existing infrastructure should be protected during the course of construction works.

Alternatively, the applicant may wish to amend the site layout, or combine a diversion with amendment of the site layout.

It is possible that a sewer now deemed to be public could be crossing the development site. Therefore, should any sewer be found during construction works, an investigation of the sewer will be required to ascertain its ownership before any further works commence on site.

In order to protect drainage apparatus, Southern Water requests that if consent is granted, a condition is attached to the planning permission; for example, the developer must advise the local authority (in consultation with Southern Water) of the measures which will be undertaken to divert the public sewers, prior to the commencement of the development.

We have restrictions on the proposed tree planting adjacent to Southern Water sewers, rising mains or water mains and any such proposed assets in the vicinity of existing planting.

Our investigations indicate that Southern Water can facilitate foul sewerage disposal to service the proposed development. Southern Water requires a formal application for a connection to the public sewer to be made by the applicant or developer.

The supporting documents make reference to drainage using Sustainable Drainage Systems (SuDS).

Under certain circumstances SuDS will be adopted by Southern Water should this be requested by the developer. Where SuDS form part of a continuous sewer system, and are not an isolated end of pipe SuDS component, adoption will be considered if such systems comply with the latest Design and Construction Guidance.

Where SuDS rely upon facilities which are not adoptable by sewerage undertakers the applicant will need to ensure that arrangements exist for the long-term maintenance of the SuDS facilities. It is critical that the effectiveness of these systems is maintained in perpetuity. Good management will avoid flooding from the proposed surface water system, which may result in the inundation of the foul sewerage system.

Thus, where a SuDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should:

- Specify the responsibilities of each party for the implementation of the SuDS scheme.
- Specify a timetable for implementation.
- Provide a management and maintenance plan for the lifetime of the development.

This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

Land uses such as general hard standing that may be subject to oil/petrol spillages should be drained by means of appropriate oil trap gullies or petrol/oil interceptors.

We request that should this planning application receive planning approval, the following informative is attached to the consent: Construction of the development shall not commence until details of the proposed means of foul sewerage and surface water disposal have been submitted to, and approved in writing by the Local Planning Authority in consultation with Southern Water.

This initial assessment does not prejudice any future assessment or commit to any adoption agreements under Section 104 of the Water Industry Act 1991. Please note that non-compliance with the Design and Construction Guidance will preclude future adoption of the foul and surface water sewerage network on site. The design of drainage should ensure that no groundwater or land drainage is to enter public sewers.

Our investigations indicate that Southern Water can facilitate water supply to service the proposed development. Southern Water requires a formal application for a connection to the water supply to be made by the applicant or developer.

KCC Highways: The application is supported by a Transport Statement by Velocity Transport Planning.

The proposal seeks to provide 110 static caravans, to the north east of the existing primary site with the existing access arrangements remaining via Preston Road. It is noted that the caravans are proposed as holiday lets, and not for residential purposes.

Informal parking takes place along Preston Road, between the site access and the village centre. Spratling Street is a two way highway, which narrows considerably at the eastern end towards Haine Road.

Traffic surveys were undertaken at the following junctions:
Existing site access
B2050 / Manston Road / Spitfire Way
B2050 / High Street / Preston Road
Spratling Road / Preston Road

All caravans are proposed to accommodate 2 and 3 bedrooms. As such it has been agreed that parking should be proposed in line with residential parking standards for a 'rural' location, whereby 2 parking spaces are required per caravan. One hard standing space is proposed per plot, with an additional space available in a tandem arrangement on a grassed area. 48 visitor parking spaces are proposed, 12 of which offset the loss of spaces as a result of the access.

The remaining 28 spaces equates to 13% additional parking, which is considered acceptable. 10 commercial parking spaces are proposed on site. Tracking has been provided for a large car and a 4.6 light van which is acceptable.

Trip Generation

Observed traffic movements for the existing caravan site have been assessed as a first principles approach, which is considered acceptable. This would see an additional 24 two way trips in the AM peak and 27 two way trips in the PM peak period.

It has been agreed that due to the holiday let nature of the proposal, a majority of the users would be travelling from locations outside of Kent. It is noted that changeovers take place on Saturday, or Friday/Sunday for a long weekend stay.

The proposal would see a 21.1% and 51.1% impact in the AM and PM peak periods. The TA states that this increase is attributed to the current low observed flows. The nature of Spratling Road has been raised as a concern due to rat running. The majority of visitors are likely to be accessing strategic highway network, whereby it is considered that the increased traffic numbers using Spratling Road is likely to have a severe impact on the highway network.

In line with the above I confirm that provided the following requirements are secured by condition or planning obligation, then I would raise no objection on behalf of the local highway authority:

Provision and permanent retention of the vehicle parking spaces and/or garages shown on the submitted plans prior to the use of the site commencing.

Provision of measures to prevent the discharge of surface water onto the highway.

Provision and permanent retention of the cycle parking facilities shown on the submitted plans prior to the use of the site commencing.

Submission of a Construction Management Plan before the commencement of any development on site to include the following:

- (a) Routing of construction and delivery vehicles to / from site
- (b) Parking and turning areas for construction and delivery vehicles and site personnel
- (c) Timing of deliveries
- (d) Provision of wheel washing facilities
- (e) Temporary traffic management / signage

Informatives:

It is important to note that planning permission does not convey any approval to carry out works on or affecting the public highway.

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be a given because planning permission has been granted. For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens that do not look like roads or pavements but are actually part of the public highway. Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have highway rights over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. This process applies

to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process.

Should the development be approved by the Planning Authority, it is the responsibility of the applicant to ensure, before the development is commenced, that all necessary highway approvals and consents have been obtained and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority. The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website.

KCC Ecological Advice Service:

"We have reviewed the information submitted by the applicant and advise that sufficient ecological information has been provided.

Under section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and paragraphs 180 and 186 of the National Planning Policy Framework (NPPF) 2023, biodiversity should be maintained and enhanced through the planning system. Enhancement refers to providing net benefits for biodiversity over and above requirements for avoidance, mitigation and compensation. As such, if planning permission is granted, we advise the conditions below are included.

Thanet District Council will need to carry out an Appropriate Assessment due to the increase in holiday accommodation within the zone of influence of a Special Protection Area. Thanet District Council will also need to consult with Natural England prior to determination and take its advice into account when determining the application.

Thanet Coast and Sandwich Bay Special Protection Area (SPA) and Wetland of International Importance under the Ramsar Convention (Ramsar Site)

The development includes proposals for new holiday accommodation within the zone of influence (7.2km) of the Thanet Coast and Sandwich Bay Special Protection Area (SPA) and Wetland of International Importance under the Ramsar Convention (Ramsar Site). This type of development can cause additional recreational disturbance, and likely significant effects on birds using the SPA and Ramsar sites.

Thanet District Council must consider the impact the proposal will have on these designated sites in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) and the National Planning Policy Framework (NPPF) 2023.

The Conservation of Habitats and Species Regulations 2017 Regulation 63 (3) also indicates that for SACs and Special Protection Areas (SPAs): "The competent authority must

for the purposes of the assessment consult the appropriate nature conservation body and have regard to any representations made by that body within such reasonable time as the authority specifies." The local planning authority (the competent authority) must therefore consult with and take into consideration Natural England's advice in determining the application. The local planning authority also needs to be confident that proposals will not adversely affect these sites in line with the NPPF 2023.

The responsibility for carrying out a Habitat Regulations Assessment (HRA) Screening and Appropriate Assessment lies with the Competent Authority, Thanet District Council.

The Strategic Access Management and Monitoring Plan (SAMMP) in respect of the Thanet section of the Thanet Coast and Sandwich Bay SPA is only for new housing development. Any new development of one home or more within Thanet District will be required to pay a tariff.

Other development which is not included as a housing allocation in the SAMMP may have an effect, alone, or in combination, on the protected sites, but is not covered by the tariff payments. Such development can include, but is not restricted to, the following:

- o A housing development of sufficient scale to generate additional significant effects, alone or in combination;
- o A development of sufficient proximity to the protected site to generate additional significant effects, alone or in combination;
- o Increases in holiday accommodation close to the coast;
- o Extension of the period of residency at caravan parks close to the coast;
- o Conversion of business use to residential in proximity to the coast;
- o Conversion of business or residential, or beach huts, to holiday accommodation

Thanet District Council will need to ensure that proposals for new dwellings fully adhere to the agreed approach within the Strategic Access Management and Monitoring Plan (SAMMP) to mitigate for additional recreational impacts on the designated sites and to ensure that adequate means are in place to secure the mitigation before first occupation.

For development, such as those above, that are not covered by the tariff payments, Thanet District Council will be required to consider such applications (and in others which it considers may also have a likely significant effects on protected sites), and require assessment and mitigation as appropriate.

A decision from the Court of Justice of the European Union has detailed that mitigation measures cannot be considered when carrying out a screening assessment to decide whether a full 'Appropriate Assessment' is needed under the Habitats Directive. We advise that there is a need for an Appropriate Assessment to be carried out as part of this application.

General Ecological Mitigation

We suggest that the below wording is included as a condition for a Construction Ecological Management Plan (CEMP - biodiversity) if planning permission is granted. This will mitigate for impacts to biodiversity and help ensure compliance with relevant legislation.

We advise that the below suggested wording does not cover all aspects usually covered within a Construction Environmental Management Plan (CEMP) (such as pollution control, noise, lighting etc. during construction). Therefore, this wording should either form part of any larger CEMP / Construction Management Plan (CMP) condition required or should form a separate stand-alone condition for a Biodiversity Method Statement.

Suggested Condition Wording:

Prior to commencement of works (including site clearance), a construction ecological management plan (CEMP - biodiversity) will be submitted to and approved in writing by the local planning authority. The CEMP - biodiversity will be based on the recommendations in section 11 of the Native Ecology (November 2023) Preliminary Ecological Appraisal report and include the following:

- o Risk assessment of potentially damaging construction activities;
- o Identification of 'biodiversity protection zones';
- o Use of protective fences, exclusion barriers and warning signs.
- o Practical measures (both physical measures and sensitive working practises) to avoid or reduce impacts during construction (may be provided as a set of species or habitat-specific method statements);
- o The location and timing of sensitive works to avoid harm to biodiversity features;
- o The times during construction when specialist ecologists need to be present on site to oversee works;
- o Details of any necessary protected species licences and reference to any other relevant documents e.g., Arboricultural Method Statement;
- o Timetable for implementation demonstrating that works are aligned with the proposed phasing of development;
- o Responsible persons and lines of communication;
- o The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person, and;

The approved CEMP - biodiversity will be adhered to and implemented throughout the construction period in accordance with the approved details.

General Ecological Enhancement

To ensure that a biodiversity net gain can be achieved for the development in line with the NPPF 2023, we recommend that the below condition is included if planning permission is granted.

Suggested Condition Wording:

Prior to commencement of works (including site clearance), an Ecological Design Strategy (EDS) will be submitted to, and approved in writing by, the local planning authority. The EDS shall demonstrate (can be qualitatively following judgement by a suitably qualified ecologist) how the development will produce a biodiversity net gain. The EDS shall include the following:

- o Purpose and conservation objectives for the proposed works;
- o Review of site potential and constraints;
- o Detailed design(s) and/or working method(s) to achieve stated objectives;
- o Extent and location/area of proposed works on appropriate scale maps and plans;

- oType and source of materials to be used where appropriate, e.g. native species of local provenance;
- oTimetable for implementation demonstrating that works are aligned with the proposed phasing of development;
- oPersons responsible for implementing the works;
- oDetails of initial aftercare and long-term maintenance (including management prescriptions for achieving aims and objectives, and a work schedule capable of being rolled forwards); and
- oDetails for monitoring and remedial measures.

The EDS shall be implemented in accordance with the approved details and all features shall be retained thereafter.”

KCC Economic Development: No requirement for us to assess the application for developer contributions.

TDC Environmental Health: *Final comment* - Following the submission of the air quality screening assessment, which has considered baseline air quality conditions, cumulative impacts and site classification criteria, EH are satisfied that the proposed development would have no significant impacts.

An emissions mitigation assessment has calculated damage costs at £12,359, over a 5-years; and incorporated additional EVC into the development. Plans showing the layout of the EVC have been submitted.

A total of 27 EV chargers has provided adequate mitigation.

Initial comment "Air Quality - The scale of the application triggers an air quality and emissions mitigation assessment.

An air quality assessment shall be undertaken in accordance with Thanet District Council's Air Quality Technical Planning Guidance 2016 and EPUK / Institute of Air Quality Management Planning for Air Quality Guidance 2017. Any assessment shall also include PM2.5 and cumulative impacts of any permitted major development. The Emissions Mitigation Assessment shall include a damage cost assessment that uses the DEFRA emissions factor toolkit and shall include details of mitigation to be included in the development which will reduce the emissions from the development during construction and when in operation in accordance with IAQM Guidance on the Assessment of dust from demolition and construction 2023. All works, which form part of the approved scheme, shall be completed before any part of the development is occupied and shall thereafter be maintained in accordance with the approved details.

Prior to occupation, an air quality Emissions Statement that provides details of how the air quality damage costs, as calculated within the Emission Mitigation Assessment are to be used to achieve air quality improvements through the development, shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Prior to the commencement of the development a Construction Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority. The Construction Environmental Management Plan shall include amongst other matters details of: hours of construction working; measures to control noise affecting nearby residents; wheel cleaning/chassis cleaning facilities; dust control measures; lighting control measures; pollution incident control and site contact details in case of complaints. The construction works shall thereafter be carried out at all times in accordance with the approved Construction Environmental Management Plan, unless any variations are otherwise first submitted to and approved in writing by the Local Planning Authority.

Condition: Electric Vehicle Charge Points

Prior to the commencement of the development hereby permitted, details of the electric vehicle charging points to be provided within the development, including their location and design, shall be submitted to and approved in writing by the Local Planning Authority. The electric vehicle charging points shall be in the form of 1 active charging point per 10 parking spaces. achieving no less than 10%. The electric vehicle charging points shall be provided prior to the opening of the commercial unit and thereafter maintained."

TDC Waste : No objections.

COMMENTS

This application is referred to the Planning Committee at the request of Cllr Bambridge due to concerns that the development would represent over-development and the impacts of the proposal on highway, the environment, landscaping and infrastructure.

The main considerations in assessing the submitted scheme are the principle of development, the impact upon the character and appearance of the area, the impact upon living conditions of neighbouring property occupiers and the impact upon highway safety.

Principle

In line with Section 38(6) of the Planning and Compulsory Purchase Act 2014, planning decisions must be taken in accordance with the 'development plan' unless material considerations indicate otherwise. The requirements of the National Planning Policy Framework (NPPF) are a significant material consideration in this regard.

The application site lies outside the village confines and is, therefore, in countryside and also within a landscape character area - Manston Chalk Plateau.

The site is within flood zone 1 (the lowest risk of flooding).

The site lies within the countryside where development is generally restricted. However, both the NPPF and Local Plan acknowledge the importance of supporting the rural economy and the importance of tourism.

The NPPF states, at paragraph 88, that: ' Planning policies and decisions should enable:

- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, beautiful new buildings;
- b) the development and diversification of agricultural and other land-based rural businesses;
- c) sustainable rural tourism and leisure developments which respect the character of the countryside; and
- d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship..'

It adds at paragraph 89: "Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist."

Local Plan Policy SP24 generally restricts development in the countryside unless it is for the growth of an existing rural business or rural tourism and leisure development, amongst the five criteria.

Policy E08 is broadly supportive of development, diversification, upgrade or improvement of self catering accommodation provided that:

- '1) it is sustainably located;
- 2) it is of a form, scale and design appropriate to its surroundings;
- 3) in relation to a caravan and camping park, that it does not cause unacceptable impact on the local road network or highway safety, and wherever possible is well related to the primary and secondary road network; and
- 4) if it is located in a rural area, that it respects the character of the local countryside and is sensitive to its defining characteristics;
- 5) Sufficient mitigation should be provided to prevent any material increase in recreational pressure on designated nature conservation sites.'

In relation to the above: The proposed extension is an extension of the existing Caravan Park known as Preston Caravan Park to provide up to an additional 110 caravans on site.

The supporting information submitted with the application details that the proposed extension will be managed in the same manner as the existing park from the same established site office and served via the existing access onto Preston Road and internal service roads. In terms of justification for the extension it is detailed that caravans have increased in size over the years, over 30 pitches have previously been lost. As such it is necessary to replace these pitches and also to address the direction of continued future demand for larger units, which will result in the further loss of smaller pitches in the longer term. The supporting information confirms that the proposed caravan units will be little

different to those existing on site, apart from being larger than the older units, and newer. It is added that the existing and proposed holiday units are an extremely popular form of accommodation, as they provide for affordable, family holidays, all year round, especially given the nature and extent of insulation and facilities the modern units provide. In addition, the pandemic has highlighted the need to be able to satisfy demand arising from those wishing to holiday away from cities and urban settlements, particularly to coastal locations, but still within reasonable proximity to services and amenities. It is highlighted that visitors to the site could offer support for the village facilities - public house and shop and that the expansion will generate full and part time jobs relating to construction during the implementation stages.

Officers consider that clearly the proposal supports tourism and the rural economy with the benefit of being at low risk of flooding.

It is important to note however, that all units will be required to fall within the definition of a caravan and therefore, in planning terms, there is a status quo. That is to say the existing site has permission for 155 caravans regardless of whether they are single or twin units or 'lodges' as long as they fall within the definition of a caravan. It is true however that site licence requirements may not allow for that number (e.g. distance between caravans may prevent that number of larger units.)

Notwithstanding this, more spacious units do not necessarily mean more people (although it is acknowledged that they could), they do however provide a variety of choices which improves the tourism offer.

The site lies outside the urban confines, within the open countryside. It is generally accepted that caravan parks, in the main, require a countryside location. The proposed development would represent an expansion to an existing caravan park and Thanet Local Plan Policy SP24 states that development on non-allocated sites in the countryside will be permitted for the growth and expansion of an existing rural business and for rural tourism and leisure development. All development proposals to which this policy applies should be of a form, scale and size which is compatible with, and respects the character of, the local area and the surrounding countryside and its defining characteristics. Any environmental impact should be avoided or appropriately mitigated.

In summary, whilst it is considered that the scheme would bring benefits to tourism and the rural economy due to the size of the expansion and its location within countryside and a landscape character area it has the potential to create harm to the landscape character area.

Impact upon countryside and landscape character

Policy SP24 makes it clear that one of the main issues with developments such as these are their impact on visual amenity and the intrinsic character and beauty of the countryside.

This application was accompanied by an LVIA (Landscape and Visual Impact Assessment.)

The assessment details Thanet District Local Landscape Character Area Assessment (LLCAA) (2017) defines the area as part of the Manston Chalk Plateau. See Figure 3. Arable

and horticultural uses are noted, with the former airport and runway detracting features in the landscape. This is interspersed with the villages of Woodchurch and Manston. Tree belts allow other less characteristics land uses to assimilate into the landscape. The urbanising influence of Newington is noted, as is Kent International Airport and the Spitfire and Hurricane Museum nearby. Some distant views are available in this Character Area.

The site is on currently arable land of low biodiversity value and with little structural diversity; there are no hedgerows or other features within the area proposed for development. The site is adjacent to arable fields on two sides, with the village of Manston to the South along Spratling Street, with Preston Park and Preston Road lying to the West. There is currently a prominent tree belt along the eastern boundary of Preston Park, which is noticeable in most views, and is a common landscape element as noted in the LLCA Manston Chalk Plateau description.

The wider landscape area reflects the characteristics described in the LLCA for Thanet District (Manston Chalk Plateau).

The key landscape elements for the site and its context are the arable field and tree belts. The site and its context does not have long range views.

It concludes this is a landscape of Medium Sensitivity overall, and has some capacity to accommodate appropriate sustainable development.

A total of 7 Viewpoints were assessed in relation to visual impact with the overall conclusion being moderate to low sensitivity. This means the proposed development would cause a limited deterioration to the view. Once the proposed screen planting within the site matures the significance of the visual effect of the development would improve on these two visual viewpoints. The most sensitive visibility would affect receptors using Footpath 25 travelling east from Preston Road.

Structural landscape planting will be provided around the entire site, linking to the existing hedge to the south within the existing caravan site. This will include woodland group planting at north west corner of the site, tapering of the northern boundary to conserve open views from footpath, substantial planting between edge of footpath and northern boundary including hedging, wildflower meadow, flowering native trees, rustic style fencing at edge of footpath with rest of boundary planted with trees and hedging together with internal planting to screen bin store and new commercial parking area.

Officers consider that the existing Caravan Park is well maintained and there is no reason to consider the extension would not be kept to the same high standard. The site layout submitted has a low density which enables landscaping between caravans as well as on the outer boundaries. In terms of the proposed planting the species, densities, heights will need to be considered to ensure that they are appropriate for the site and its wider setting in terms of landscape impact.

With regard to the proposed layouts, screening and landscaping is proposed. If permission was forthcoming the landscape screening would be implemented from the commencement of the first phase so that when later phases are implemented the landscape screening would

have had a period of time to establish. An illustrative section has been produced to show planting in years 1-2, year 6 and year 15. Part of the extended site would be screened by the existing caravan park in other views. Long views from the New Haine Road would be gained but given their distance to the site and the intervening structure/vegetation the impact would be reduced. The short views of the proposed extension would be gained from the public footpath to the north of the extension and from the east from Spratling Street. In regard to views from the footpath this has soft landscaping along parts of the footpath that limit views to some degree to the site, longer views looking to the west would be seen against over vegetation, solar farm and the caravan park. Whilst I do accept that there would be a degree of change the change is not considered harmful in landscape terms..

In regard to the view from Preston Street the field boundary to the road and where the caravan park extension is proposed has limited screening currently, as such there would be views of the proposed extension to the park. This would be from road users whether that be by vehicle or foot (although there is no footpath at this point). At present the view from Spratling Street you would experience views of the field, telegraph poles, and distant built form, in addition the existing caravan park is also seen where there is limited screening as well as the screening provided to other parts. The proposal would bring about change to this view, limiting long views across the field and housing only allowing for a shorter view with a created landscape buffer. It is accepted that this would be a clear change however it would be seen as a continuation of the existing landscaping associated with the caravan park.

In terms of views from Spratling Street the caravans will be situated a considerable distance (approximately 185m) from the highway and their visual impact will therefore be significantly lessened. The proposal, if permitted, would represent a continuation of a new belt of trees, as such I consider the impact to be acceptable.

The resulting layout reduces any visual connection between the countryside, so no ridgelines would be visible. The site would be viewed within the context of the built form of the caravan park and not as part of the setting of the countryside given the proposed perimeter planting that is to be provided within the first phase to ensure that it becomes established for the implementation of later phases. Given the proposed mitigation and the benefits to allow the expansion of an existing rural business the visual impact is considered acceptable. It is considered that the submitted LVIA is robust and that the development would have a negligible visual impact subject to safeguarding conditions.

Agricultural Land

The NPPF policy 180 states that decisions should protect soils, in a manner commensurate with their statutory status or identified quality.

Local Plan policy E16 of the Local Plan relates to best and most versatile agricultural land and states "Except on sites allocated for development by virtue of other policies in this Plan, planning permission will not be granted for significant development which would result in the irreversible loss of best and most versatile agricultural land unless it can be clearly demonstrated that: 1) the benefits of the proposed development outweigh the harm resulting from the loss of agricultural land, 2) there are no otherwise suitable sites of poorer agricultural quality that can accommodate the development, and 3) the development will not

result in the remainder of the agricultural holding becoming not viable or lead to likely accumulated and significant losses of high quality agricultural land."

The application is supported by an Agricultural Quality Assessment. This identifies most of the land as freely draining soils, giving Grade 2 quality agricultural land (slightly limited by droughtiness). A small area in the north-west has soils with impeded drainage, giving Subgrade 3a quality land due to wetness/workability limitation. In terms of percentage of the application site 98% is Grade 2 and the remaining 2% is 3a.

It is acknowledged that there would be clear benefits of providing additional tourist accommodation. The agricultural land being lost is not the highest quality; Grade 1. It is also appreciated that there is no other way for this local business to expand or be competitive with other sites in terms of size/quality of unit without some encroachment onto adjoining agricultural land. The applicants have demonstrated that whilst the land would be classed as best and most versatile that this is not Grade 1 agricultural land, whilst the Regional Agricultural Land Classification Maps can be used these only give a broad brush identification of land classification, not site specific. Having regard to these there is only excellent and good land within the area, however this would not allow for the expansion of this business potentially forcing it to create a further site with new infrastructure required and other impacts which may be greater - landscape character, flooding, highways.

It is not considered that the proposal would make the remaining land difficult to cultivate, as having regard to aerial photography it is clear that few fields in the surrounding area in agricultural use are a regular shape, some having curved edges or sections taken out for development over the years but still appear to be managed for farming.

On balance, the loss of agricultural land in this instance is considered to be outweighed by the benefits of economic growth of an existing business with the provision of good quality holiday accommodation as well as environmental benefits through the provision of wild meadow and native tree planting.

Living Conditions

Paragraph 123 of the NPPF states that planning decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

Local Plan policies QD03 and QD04 are also relevant to this application. Policy QD03 (Living Conditions) states that All new development should:

- 1) Be compatible with neighbouring buildings and spaces and not lead to unacceptable living conditions through overlooking, noise or vibration, light pollution, overshadowing, loss of natural light or sense of enclosure.
- 2) Be of appropriate size and layout with sufficient usable space to facilitate comfortable living conditions and meet the standards set out in QD04.
- 3) Residential development should include the provision of private or shared external amenity space/play space, where possible.

4) Provide for clothes drying facilities and waste disposal or bin storage, with a collection point for storage containers no further than 15 metres from where the collection vehicle will pass.

The extension to the site would result in a material increase in the operational capacity of the site, however the site would still be a distance of some 130m from the nearest dwelling (Garden Cottage) and it is, therefore, considered that the development would not result in any material neighbour amenity issues from the physical presence of the caravans. In terms of noise issues from the park, whilst there would be an increase in caravans and therefore potentially residents, the park would effectively be enclosed by soft landscaping which will provide some attenuation. Given this together with the distance of separation, would in my view, not create noise that would be unacceptable in a residential/rural location where there is already noise from residences, road traffic noise and farm machinery.

The extension area is suitably separated from any existing non-associated residential development, to conclude there would be negligible impact over and above existing caravans, many of which are currently located closer to these dwellings.

The proposed development is, therefore, considered to be acceptable in terms of the living conditions of adjacent neighbouring properties, in accordance with Policy QD03 of the Thanet Local Plan and paragraph 135 National Planning Policy Framework.

Highways

Paragraph 87 of the NPPF details that planning decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In addition as cited above paragraph 88 states that planning decisions should enable the sustainable growth and expansion of all types of business in rural areas; the development and diversification of land-based rural businesses; and sustainable rural tourism and leisure developments which respect the character of the countryside.

Policy SP37 of the Local Plan states that new development must take account of the need to respond to climate change: 1) by minimising vulnerability and providing resilience to the impacts of climate change through the use of up to date technologies, efficient design and appropriate siting and positioning of buildings; 2) mitigating against climate change by reducing emissions and energy demands through the use of up to date technologies; 3) realise and make best use of available opportunities to reduce the impact of climate change on biodiversity and the natural environment by providing space for habitats and species to move through the landscape and for the operation of natural processes, particularly at the coast. Policy SP43 of the Local Plan states that the Council will work with developers, transport service providers, and the local community to manage travel demand, by promoting and facilitating walking, cycling and use of public transport as safe and convenient means of transport. Development applications will be expected to take account of the need to promote safe and sustainable travel. New developments must provide safe and attractive cycling and walking opportunities to reduce the need to travel by car. Whilst policy SP44 states development generating a significant number of trips will be expected to be located

where a range of services are or will be conveniently accessible on foot, by cycle or public Transport.

Under Policy QD01, all developments are required to: 1) Achieve a high standard of energy efficiency to the equivalent of Level 4 of the Code for Sustainable Homes (subject to HE05 where applicable), 2) Make the best use of solar energy passive heating and cooling, natural light, natural ventilation and landscaping, 3) Provide safe and attractive cycling and walking opportunities to reduce the need to travel by car. Policy QD02 relates to general design principles and states amongst other principles that developments must incorporate a high degree of permeability for pedestrians and cyclists, provide safe and satisfactory access for pedestrians, public transport and other vehicles, ensuring provision for disabled access and Improve people's quality of life by creating safe and accessible environments, and promoting public safety and security by designing out crime. Policy TP01 states that new development will be expected to be designed so as to facilitate safe and convenient movement by pedestrians including people with limited mobility, elderly people and people with young children, whilst Policy TP03 states new development will be expected to consider the need for the safety of cyclists and incorporate facilities for cyclists into the design of new and improved roads, junction improvements and traffic management proposals.

The application is supported by a Transport Statement (TS) by Velocity Transport Planning. Traffic surveys were undertaken at the following junctions:

Existing site access

B2050 / Manston Road / Spitfire Way

B2050 / High Street / Preston Road

Spratling Road / Preston Road

The TS concludes that:

The proposed development is in accordance with relevant National, Regional and Local Policy and Guidance;

A review of the existing highway conditions has identified that no pre-existing highways safety concerns are present, and the proposed development would not exacerbate these existing conditions.

Given its rural setting, the proposed development site is in an accessible location, with relatively good levels of accessibility to the local public transport network, and walking and cycle network; and

The highways impact analysis has identified that the trip generation associated with the proposed development will not have a detrimental impact on the operation and safety of the existing highway network.

KCC considered that as all caravans are proposed to accommodate 2 and 3 bedrooms, parking should be proposed in line with residential parking standards for a 'rural' location, whereby 2 parking spaces are required per caravan. One hard standing space is proposed per plot, with an additional space available in a tandem arrangement on a grassed area. 48 visitor parking spaces are proposed, 12 of which offset the loss of spaces as a result of the access. The remaining 28 spaces equates to 13% additional parking and 10 commercial parking spaces are proposed on site. KCC has agreed that due to the holiday let nature of the proposal, a majority of the users would be travelling from locations outside of Kent. The proposal would see a 21.1% and 51.1% impact in the AM and PM peak periods. The TA

states that this increase is attributed to the current low observed flows. KCC have confirmed that they have no objection subject to conditions relating to provision and permanent retention of the vehicle parking spaces, provision of measures to prevent the discharge of surface water onto the highway, provision and permanent retention of the cycle parking facilities and submission of a Construction Management Plan.

Officers have reviewed the submitted information and consultee response and note that the existing access is utilised off Preston Road and that parking for the scheme is shown to be in accordance with KCC parking standards. Whilst the site access itself with the wider road network can provide suitable and safe access and parking provision is in accordance with parking standards, the site is not in a sustainable location in terms of transport with the chance of using other modes of transport than the private car slim and certainly not prioritised as required by paragraph 116 of the NPPF, however given that this is an existing business that would be expanded that is located within a rural area it is not considered that a refusal could be sustained.

It is considered that the correct junctions have been chosen for highway modelling. It is appreciated that the number of trips to and from the site will increase with the number of additional units this is unlikely to be at the same day and time, rather this will vary throughout the week and times will also vary dependant on travel distances/times, if people are coming straight to the site or visiting a place of interest enroute first.

In terms of proposed conditions outlined above I consider that this is necessary to ensure the site has sufficient parking for users and thus not increasing parking on street and also providing provision of cycle stores, which most tourists who stay on these camping sites generally bring bikes too. The construction management plan is also considered appropriate given the rural nature of the road network in the immediate roads adjoining the site and to avoid any unnecessary conflicts with other road users.

Overall the proposal is considered acceptable in terms of the impact upon the highway network, traffic generation and parking and, as such, is considered acceptable subject to condition.

Ecology and biodiversity

Paragraph 180d) of the NPPF requires planning decisions to minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Thanet Local Plan Policy SP30 (Biodiversity and Geodiversity Assets) states development proposals will, where appropriate, be required to make a positive contribution to the conservation, enhancement and management of biodiversity and geodiversity assets resulting in a net gain for biodiversity assets. Sites should be assessed for the potential presence of biodiversity assets and protected species. For sites where important biodiversity assets, including protected species and habitats including SPA functional land, or other notable species, may be affected, an ecological assessment will be required to assess the impact of the proposed development on the relevant species or habitats. Planning permission will not be granted for development if it results in significant harm to biodiversity

and geodiversity assets, which cannot be adequately mitigated or as a last resort compensated for, to the satisfaction of the appropriate authority.

A Preliminary Ecological Appraisal (PEA) and Winter Bird Report were submitted in support of the application. The findings of the PEA can be summarised that it recommends that a shadow Appropriate Assessment is undertaken, informed by wintering bird surveys, to determine whether the development could potentially result in the loss of functionally linked habitat for golden plover. Mitigation without the requirement for further survey work, so recommended for foraging and commuting bats, birds, hedgehogs and badgers. The Winter Bird Report details that eight winter bird survey visits were conducted between 11th November 2023 and 6th February 2024. Survey visits comprised four day time and four night time walkovers. A total of 24 bird species were recorded during the day time winter bird survey visits, of these 18 species were actually making use of the Application Site. A total of eight bird species were recorded during the night time winter bird survey visits, of which five species were actually making use of the Application Site. A desk study returned no records within the areas surveyed of bird species associated with the Thanet Coast and Sandwich Bay Ramsar and SPA and the Sandwich Bay to Hacklinge Marshes SSSI. No bird species associated with the Thanet Coast and Sandwich Bay Ramsar site, SPA and the Sandwich Bay to Hacklinge Marshes SSSI were recorded within any of the areas surveyed during the four day time and four night time survey visits. Four red status and six amber status species were recorded within the application site. However, the number of recorded bird species and peak winter counts indicate that the application site is likely to be of ecological importance at a Local Level for wintering bird species.

KCC Ecological Advice service does not raise any objection in relation to the application and suggests conditions in relation to a Construction Ecological Management Plan, a general ecological enhancement condition.

It is recognised that the site itself has limited value given its agricultural use, however, it is still appropriate to secure enhancements which can be secured by condition in line with policy SP30.

Officers would confirm that the Statutory Biodiversity Net Gain (BNG) did not come into force until after this application was received and therefore this application is not subject to statutory BNG of 10%. Policy SP30 does require development to make a positive contribution where appropriate. Given the site's size and rural location this site is considered to be a site where officers would expect this. The submitted plans show additional tree planting to the perimeter in a width band of 10m as well as a wildflower meadow and landscaping in and around the caravans positioned within the site. Details of the tree planting, species, heights, planting plans and again for the wildflower meadow can be secured by condition.

The site as farmland currently has a low ecological value (the site is actively farmed and not fallow, although there may be some ecological value to the field edges). Some enhancements are required by policy SP30 and it is considered that the offer proposed would represent a positive to the ecological value of the land and wider area that it would be connected to, as such officers consider this to be acceptable.

Flooding and Drainage

The site is in flood zone 1 (lowest risk of flooding) and the site lies within the Groundwater Source Protection Zone. To accord with Thanet Local Plan Policy SE04, proposals in this area will only be permitted if there is no risk of contamination to groundwater sources or if a risk is identified then adequate mitigation measures can be implemented. Thanet Local Plan Policy CC02 relates to Surface Water Management and outlines that new development is required to manage surface water resulting from the development using sustainable drainage systems (SuDs) wherever possible and proposals for SuDs at sites within the Groundwater Source Protection Zone must demonstrate that the methods used will not cause detriment to the quality of the groundwater.

The supporting documentation submitted with the application states that the development for surface water disposal will be to infiltrate within the site and utilise the connections to the foul drainage. Foul drainage will be designed in accordance with the requirements of the Building Regulations. Approval will be required from Southern Water for S106 approval to connect to the public foul drainage system. Adequate drainage provision is also a requirement of the Caravan Site Licence.

The Environment Agency (EA) and Southern Water have reviewed the application. The EA raise no objection and Southern Water do not object to this planning application on the condition that hydrocarbon pollution prevention is included in the Surface Water drainage design, prior to run-off entering soakaway features that will infiltrate to ground. Southern Water will require review of this revised drainage design and/or drainage strategy.

The application is supported by a Flood Risk Assessment which concludes that the risk of surface water flooding is assessed as a very low risk of surface water flooding. The risk of flooding from all other sources is assessed as low. Mitigation measures are proposed to reduce flood risk to a negligible and acceptable level. This would be achieved through design. The proposed static holiday caravans would have a minimum floor level at +600mm above external levels, which is considered suitable given the low risk of flooding.

Large areas of the site are not covered in hardstanding for caravans to stand on, or access roads around the site, this would effectively allow for natural infiltration of surface water. Given the increase in hard surfacing which is relatively limited the increase in flood risk to adjacent sites is not considered significant.

Southern Water has confirmed they have no objection subject to a review of the drainage design/strategy that should include hydrocarbon pollution prevention, prior to run-off entering soakaway features that will infiltrate to ground. They will require review of this revised drainage design and/or drainage strategy as such this is recommended as a condition.

Given the low risk of flooding to the site (flood zone 1) the proposed mitigation of raising the floor level is considered acceptable and accords with Thanet Local Plan Policies CC02 and SE04 and advice contained within the NPPF.

Air Quality

The UK Air Quality Strategy Regulations 2010 is the method for implementation of the air quality limit values in the UK and provides a framework for improving air quality and protecting human health from the effects of pollution. There is also a requirement, under the Environment Act (1995), for local authorities to periodically review and assess air quality with their area of jurisdiction under the system of Local Air Quality Management (LAQM). This review and assessment of air quality involves assessing present and likely future air quality against the air quality objectives. Thanet Local Plan Policy SP37 states that all new development must take account of the need to respond to climate change.

Policy SE05 of the Thanet Local Plan relates to Air Quality and outlines that new development must ensure that users are not significantly adversely affected by the air quality and include mitigation measures where appropriate. All developments which either individually or cumulatively are likely to have a detrimental impact on air quality, will be required to submit an Air Quality and/or Emissions Mitigation Assessment. The Air Quality Assessment should address the cumulative effect of further emissions whilst the Emissions Mitigation Assessment should address any proposed mitigation measures. Such assessments should calculate a damage cost for the proposed development. Guidance states that damage costs are a simple way to value changes in air pollution and estimate the cost to society of a change in emissions of different pollutants. Damage costs are provided by pollutant, source and location.

The application is supported by an Air Quality Assessment (AQA). The assessment concluded that during the operational phase, the proposed development would have no significant impact on, nor would be significantly impacted by, local air quality, including when considering potential cumulative effects. The AQA details that proposed development is considered to include an appropriate level of air quality mitigation, as it includes significant green infrastructure and goes beyond the standard requirements for electric vehicle charge points.

The Environmental Health Officer has reviewed the information and considers that the development would have no significant impacts; Electric Vehicle Charging Points to be provided within the site area for the development to be acceptable and a calculated damage costs at £12,359, over a 5-years.

The submitted Air Quality Assessment is considered to be comprehensive and meet the requirement for the assessment. It is accepted that the development will be likely to lead to more trips to and from the site by the additional clients coming and going from the site, most journeys will be by car and therefore this will generate emissions and affect air quality. There would be limited dust creation given the nature of the works required to facilitate the use. The use of EV charging points is welcomed as part of the development and additional tree planting will offset any harm as well as benefits in terms of climate control and considered acceptable in accordance with Policies SP37 and SE05 of the Thanet Local Plan and advice contained within the NPPF.

Contributions

Natural England has previously advised that the level of population increase predicted in Thanet should be considered likely to have a significant effect on the interest features for

which the Thanet Coast and Sandwich Bay Special Protection Area (SPA) and RAMSAR have been identified.

Thanet District Council produced the 'The Strategic Access Management and Monitoring Plan (SAMM)' to deal with these matters, which focuses on the impacts of recreational activities on the Thanet section of the Thanet Coast and Sandwich Bay Special Protection Area (SPA). The studies indicate that recreational disturbance is a potential cause of the decline in bird numbers in the SPA. To enable the Council to be satisfied that proposed residential development will avoid a likely significant effect on the designated sites (due to an increase in recreation) a financial contribution is required for all housing developments to contribute to the district wide mitigation strategy. This mitigation has meant that the Council accords with the Habitat Regulations.

This application includes a Unilateral Undertaking which provides the required financial contribution (£8,888) for the 110 holiday units to mitigate the additional recreational pressure on the SPA area. This was calculated by the number of caravans (110) x 1 bed unit SAMM amount for Thanet (£202) x winter occupancy rate (0.4), which is the formula used for other caravan parks across the district. Therefore the proposal accords with Policy SP29 and an appropriate assessment has been carried out for the application.

Other matters

Thanet District Council would not wish for any of the Caravan Parks in Thanet to be used as full time residential accommodation. A condition will be placed on the consent to ensure that the static caravans are used as holiday homes and not sole residences; which would accord with the restrictions placed on the existing Holiday Park to ensure the retention of the approved tourist accommodation. Compliance visits are made to caravan parks to ensure that these conditions are complied with and it is therefore considered that the living conditions secured are in accordance with the tourism objectives of the Thanet Local Plan.

Refuse bins located at the entrance to the proposed development will be taken to the main site access by site management to be collected at the same time as the bins associated with the existing caravan site. This is considered acceptable and raises no objection from the Waste Manager.

Conclusion

It is acknowledged that there will be landscape harm through the development by way of the creation of an extension to an existing caravan park, which would be mitigated with a manmade landscape buffer.

Planning Balance:

Achieving sustainable development is the overarching aim of the NPPF and Paragraph 8 of the NPPF expands on the basis for achieving this which is balancing economic, social and environmental objectives.

Taking each aspect in turn:

An economic objective: the development would provide up to 110 caravans for tourism which in turn would provide visitors who in turn would help to sustain key community facilities. This weighs in favour of the planning balance.

A social objective: the development would provide up to 100 caravans for tourism that range in size. In addition it would provide cultural exchange between guests and hosts and could preserve local festivals and events by attracting tourists. This weighs in favour of the planning balance.

An environmental objective: the site has limited ecological value as farmland and the provision of additional perimeter planting and wildflower meadow and landscaping within the site weighs in favour in the planning balance.

The application seeks the extension to an existing, long-established, holiday caravan park and increases the number of caravans by up to 110 units for holiday use. It will allow a spacious layout of the extended site.

There will be an incursion into the countryside adjacent to the existing site to accommodate this development, but Members will be aware that there are positive policies in the Development Plan that allow the provision and extension of tourism uses in the District, subject to their individual impacts.

In this particular case, the application has shown, through the submission of detailed reports and evidence, that there would be very limited landscape / visual impacts, neighbour or highway safety impacts, that protected sites / species and drainage issues could be suitably mitigated, and that the risks associated with flooding are low.

It is, therefore, considered that on balance the benefits of the proposal development outweigh the harm caused and the development should be approved subject to safeguarding conditions.

Case Officer

Gillian Daws

TITLE:

F/TH/23/1559

Project

Preston Caravan Site Preston Road RAMSGATE Kent CT12 5AR

