

PLANNING CONSULTATION REPLY



Brian Frater
Service Director Regulatory Services

To: Head of Planning and Building Standards
F.A.O. Lucy Hoad
From: Built & Natural Heritage
Contact: Mike Marsh Ext. 5267 Ref: 14/01282/FUL Date: 25 November 2014

PLANNING CONSULTATION

To: Rights Of Way Officer
From: Development Management Date: 24th November 2014
Contact: Lucy Hoad ☎ 01835 82511 Ref: 14/01282/FUL

PLANNING CONSULTATION

Your observations are requested on the under noted planning application. I shall be glad to have your reply not later than 15th December 2014, If further time will be required for a reply please let me know. If no extension of time is requested and no reply is received by 15th December 2014, it will be assumed that you have no observations and a decision may be taken on the application.

Name of Applicant: Park Resorts

Agent: GVA Hotels & Leisure

Nature of Proposal: Change of use of land to form extension to existing holiday park
Site: Land South West Of Nothburn Caravan Park Pocklaw Slap Eyemouth
Scottish Borders

OBSERVATIONS OF: Rights Of Way Officer

CONSULTATION REPLY

ACCESS OFFICER REPLY:

Thank you for your request to receive an outdoor access consultation response. You should note the following:

LEGISLATION

National Access Legislation

It is the duty of local authority to uphold access rights, under the [Land Reform \(Scotland\) Act 2003](#), in doing so, protect and keep open and free from obstruction or encroachment any route, waterway or other means by which access rights may reasonably be exercised.

Rights of Way are specifically protected by law under the [Countryside \(Scotland\) Act 1967](#) sec. 46 'It shall be the duty of a, planning authority to assert, protect, and keep open and free from obstruction or encroachment any public right of way which is wholly or partly within their area.'

COMMENTS

According to our records, as outlined on the enclosed plan, there are no known Core Paths / Promoted Paths / Rights of Way that are directly affected by this proposal.

Right of Way BB22 passes to the west of the proposed site on Pocklaw Slap Road.

The Access Team have no objections to make regarding this proposal. However the following condition should apply:

The path, as indicated above, must be maintained open and free from obstruction in the course of development and in perpetuity and shall not form part of the curtilage of the property (*as outlined in this application*).

Reason: To protect general rights of responsible access.

Mike Marsh

Access Ranger (Berwickshire)
Built & Natural Heritage
Regulatory Services
Scottish Borders Council
Newtown St Boswells
TD6 0SA



Council Headquarters, Newtown St Boswells, MELROSE, Scottish Borders, TD6 0SA
 Customer Services: 0300 100 1800 www.scotborders.gov.uk

Eyemouth Town Community Council
Planning
c/o Mrs Margaret Paterson
37a Church Street
Eyemouth
Berwickshire
TD14 5DH

For attention of Lucy Hoad:

LAND NORTHWEST OF NORTHBURN CARAVAN
PARK,POCKLAW SLAP,EYEMOUTH.
App Ref: 14/01282/FUL

Eyemouth Town Community Council held their monthly meeting on 24th November 2014 where the above planning application was discussed.

Whilst there were no objections to the extension of the site and the application to build over twenty residential lodges as opposed to two storey houses applied for in a previous application there was some concern about the narrow access to the site where the current hammerhead runs between two residential homes .This road would be accessing onto the Barefoots estate which is currently a narrow road twisting road with barely room for two vehicles to pass . Bearing in mind the increase in traffic from the new residential site which would be private cars for over twenty lodges ,visitors , utility , delivery etc the ETCC felt that the access road for the lodges would be better coming of the top of Pocklaw Slap which is a much wider and easier to negotiate two lane road .

We as the members of Eyemouth Town Community Council do hope that you will take these suggestions on board and safeguard the already congested Barefoots estate where children are used to playing out in the area in safety.

Yours on behalf of ETCC

Mrs Margaret Paterson
Planning & Treasurer

Scottish Borders Council

Regulatory Services – Consultation reply

| | |
|--------------------------------------|---|
| Planning Ref | 14/01282/FUL |
| Uniform Ref | 14/02271/PLANCO |
| Proposal | Change of use of land to form extension to existing holiday park |
| Address | Land South West Of Nothburn Caravan Park, Pocklaw Slap, Eyemouth, Scottish Borders |
| Date | 9th December 2014 |
| Amenity and Pollution Officer | David A. Brown |
| Contaminated Land Officer | Reviewed – No comment |

Amenity and Pollution

Assessment of Application

This is an Application to extend an existing Caravan Park development.

If Consent is granted, an amendment to the site licence will be required.

Recommendation

Agree with application in principle, subject to Informative.

Informative

CARAVAN SITES AND CONTROL OF DEVELOPMENT ACT 1960

The applicant is advised to liaise with SBC's Legal and Democratic Services, Licensing Team regarding the proposed increase, and possible amendments required to the site licence.

Brian Frater
Service Director Regulatory Services

Landscape Architect
Scottish Borders Council
Council HQ
Newtown St Boswells
Melrose
TD6 0SA

Officer Lucy Hoad
☎ 01835 825113
E-mail lhoad@scotborders.gov.uk
Application Ref : 14/01282/FUL
Date : 25th November 2014

NAME OF APPLICANT: Park Resorts Ltd
NATURE OF PROPOSAL: Change of use of land to form extension to existing holiday park
SITE: Land South West Of Nothburn Caravan Park Pocklaw Slap Eyemouth Scottish Borders
GRID REF Easting: 393911 Northing: 664601

TOWN AND COUNTRY PLANNING (SCOTLAND) ACT 1997

THE ENVIRONMENTAL IMPACT ASSESSMENT (SCOTLAND) REGULATIONS 2011

REQUEST FOR OBSERVATIONS OF: **Landscape Architect**

ENVIRONMENTAL ASSESSMENT CONSULTATION

Your observations are requested on the above noted planning application. I shall be glad to have your response not later than 23rd December 2014. If no reply is received by this date it will be assumed that you have no observations and a decision may be taken on the application.

All documents relating to this application can be viewed by following this hyperlink:
<http://eplanning.scotborders.gov.uk/online-applications/>

To activate the hyperlink, place your cursor at the end of the line and press the return key.

Please create your consultation response in a MS Word document and email it to dcconsultees@scotborders.gov.uk

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Yours faithfully

Brian Frater

Service Director – Regulatory Services

OBSERVATIONS OF: Landscape Architect: J. Knight

CONSULTATION REPLY dated 23 December 2014

It is recognised that a formal recommendation can only be made after consideration of all relevant information and material considerations. This consultation advice is provided to the Development Control service in respect of landscape related issues.

Description of the Site

The site is a paddock of rough grassland lying between the existing holiday park and residential properties at Pocklaw Slap to the south west and Barefoots to the south east. The site, BEY1, is allocated for housing in the Consolidated Local Plan, 2011, with a nominal capacity for 20 houses.

Nature of the Proposal

It is proposed to create 23 residential lodges served by a new access road off Barefoots Road all as set out on the applicant's 'Proposed Plan' drawing number 3487-320 dated SEP 2014. The applicant has submitted a Planning Statement dated August 2014 in support of the proposal.

Implications of the Proposal for the Landscape including any mitigation

The land affected is already zoned for housing and, in principal, there is no objection to the type of development proposed. Single storey lodges should be easier to accommodate visually than houses which might be higher and more obstructive to views from the adjoining residential areas. The proposed layout however is linear and repetitive and there is a general lack of detail in terms of cabin type and appearance, external finishes and, particularly, in terms of proposed planting. The submitted planning statement does not address the design issues. From previous experience, we already know that Eyemouth has a demanding climate and the successful establishment of the planting framework is going to be critical to the long term acceptability of the proposal. The lack of detail therefore needs to be addressed and I suggest it should be addressed before the application is determined.

The applicant should provide a short design statement detailing:

- Proposed cabin type with elevations / photos
- Details of access road / hard surfaces generally
- Any SUDS requirements that affect site layout?
- Any site furniture / fittings, including fencing and lighting?
- Details of proposed planting including proposed species, planting specification and density and future maintenance

Recommendation

I do not object to the application in principal but require further information before being able to support this full application.

REGULATORY SERVICES



To: **Development Management Service**
FAO Lucy Hoad

Date: **12 Dec 2014**

From: **Roads Planning Service**
Contact: **Paul Grigor**

Ext: **6663**

Ref: **14/01282/FUL**

Subject: Change of Use of Land to Form Extension to Existing Holiday Park
Land South West of Northburn Caravan Park, Pocklaw Slap, Eyemouth

This site is currently zoned for housing in the Consolidated Local Plan; therefore the principle of housing has already been accepted on this land. Subsequent comments on the outline planning application (06/00611/OUT) for twenty dwelling units indicated the main access to be taken from Pocklaw Slap with a secondary minor access via Barefoots Road.

However the current proposal is for an extension to the existing caravan park but with a separate access via Barefoots Road, with only a pedestrian link through to the existing holiday park.

Given that this proposal is for an extension to the existing holiday park, I feel the additional units should be served by an internal link from the existing and the access from Barefoots Road removed. As a result this would remove the traffic associated with the holiday park from the narrow residential network adjacent to the site. It would also remove the need for holiday park traffic arriving at the main entrance to check-in, then having to double back to access the additional units by a different access point, which would also require additional signage.

Given the above, I must recommend refusal of this application in its current form. If the applicant wishes to take on board the above comments and provide access to the site from an internal link, then I may be able to look more favourably upon this application.

DJI

PLANNING CONSULTATION

To: Forward Planning Section

From: Development Management

Date: 24th November 2014

Contact: Lucy Hoad ☎ 01835 825113

Ref: 14/01282/FUL

PLANNING CONSULTATION

Your observations are requested on the under noted planning application. I shall be glad to have your reply not later than 15th December 2014, if further time will be required for a reply please let me know. If no extension of time is requested and no reply is received by 15th December 2014, it will be assumed that you have no observations and a decision may be taken on the application.

Name of Applicant: Park Resorts Ltd

Agent: GVA Hotels & Leisure

Nature of Proposal: Change of use of land to form extension to existing holiday park
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OBSERVATIONS OF: Forward Planning Section

CONSULTATION REPLY

This site was subject to a pre-applic enquiry last year (ref 13/00842/PPP). The proposal was for the erection of a proposed holiday caravan development on the same site as the application in question.

In essence the response from Forward Planning stated that the site is allocated for housing development within the consolidated Local Plan 2011 (and this allocated is carried forward within the proposed new Local Development Plan) and consequently policy H3 – Housing Land Allocations should be applied which states that any use contrary to the use for which the site is allocated will be refused; however there are exceptions criteria, and in this case the relevant criteria is considered to be:

5 iii) the alternative use offers significant community benefits that are considered to outweigh the need to maintain the original proposed use

It has been necessary to allocate a certain level of housing to meet the south east Scotland Strategic Development Plan (SESplan) housing requirement as part of the Local Development Plan process. It is therefore considered that it would be inappropriate to allow alternative uses on allocated housing land at this time. Whilst it is accepted the proposal will offer some community benefit in terms of tourism and related local economic benefit, it is considered this would not outweigh the need to protect allocated housing sites and land supply.

It was also stated that there are other relevant Local Plan policies including- BE8 Caravan and Camping Sites, EP2 Areas of Great Landscape Value, and EP4 Coastline, and any application would need to consider these policies. It should be noted that AGLV have been replaced with

Special Landscape Areas (SLA) following the Local Landscape Designation Review of 2012. As a part of this review a Statement of Importance was produced for the Berwickshire Coast SLA; this states that caravan parks are one of the forces for change on this designated landscape. The proposed site is located adjacent to the SLA and as a result careful consideration of landscape impacts should be made.

Consequently it was concluded that the proposal could not be supported, other than if the use of the site for the proposed purpose was only for a temporary period. This would leave open the possibility for the allocated use to be developed for mainstream housing when market conditions allowed. It is understood the applicant did not consider this option feasible from a financial point of view.

In terms of the current consultation it is noted that within the supporting planning statement the proposed 23no units are referred to as "residential mobile homes". The fact that they are referred to as mobile suggests they are not for permanent use which is an issue with the Local Plan allocation which requires housing land supply to comprise of permanent homes. If they are for permanent occupancy as stated in the statement it is not understood why the proposal should remain within the confines and the control of the caravan park as is suggested. The question must be asked as to what guarantees would be in place to control occupancy of the units, e.g what would prevent the use of any of the units being used for short stay purposes in character with the operation of any other holiday outlet. Furthermore, although the statement refers to the units as being "residential mobile homes", the site plan refers to them as "residential lodges" and it is noted in para 4.14 they are referred to as "residential standard *caravans*". All these points should be clarified.

Although this is an application for full planning permission the plans submitted are lacking in detail. There are no floor plans submitted with the proposal and therefore the size of the units, the likely no of occupants and the range of interested parties they could accommodate is unclear. It is noted that para 4.16 in the planning statement suggests the accommodation may be 2/3 bedroom although in para 4.17 it is suggested the units will be ideally suited to elderly residents. If this was being promoted as mainstream housing then 25% affordable units would need to be considered. There is no reference to this requirement within the covering statement and if the proposal is for mainstream housing then advice should be sought from the Council's Development Negotiator in due course with regards to any developer contribution requirements.

It is noted that the applicants state that there has been no interest from third parties to develop the site for housing. It is considered therefore the suitability of continuing to allocate the site for housing could be addressed during the preparation of the next Local Development Plan.

Whilst there are a number of questions as stated above to be confirmed, on the evidence submitted the proposed units are mobile and it is considered the reasons for opposing the pre-application proposals remain pertinent to this proposal in that in essence the loss of this allocated permanent housing land which is required to meet the housing land requirement for the Berwickshire Housing Market Area is contrary to policy H3 of the consolidated Local Plan.

9/12/14

PLANNING CONSULTATION

To: Economic Development Section

From: Development Management

Date: 24th November 2014

Contact: Lucy Hoad ☎ 01835 825113

Ref: 14/01282/FUL

PLANNING CONSULTATION

Your observations are requested on the under noted planning application. I shall be glad to have your reply not later than 15th December 2014, If further time will be required for a reply please let me know. If no extension of time is requested and no reply is received by 15th December 2014, it will be assumed that you have no observations and a decision may be taken on the application.

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OBSERVATIONS OF: Economic Development Section

CONSULTATION REPLY

The response from Economic Development is set out below:

Economic Development supports the change of use to land to form extension to existing holiday park. In particular, this application fits with our Tourism Strategy 2013-2020 by:

- **Ensuring the Region's accommodation offerings meet consumer demands and where opportunities are available can act as an attractor of demand in themselves.**
- **Ensure a relevant range of types of accommodation is available across the Region to meet evolving market demand and expectations. Identify opportunities where better quality and new products can 'lead' and generate new demand – accommodation destination products. i.e. holiday lodge development**
- **Supporting direct employment:**

The application also fits with a Visit Scotland consultation paper (Feb 2013) on the National Tourism Development Plan for Scotland - within which Scottish Borders Council noted:

Accommodation requirements: "There is an opportunity for the provision of new and improvement of existing self-catering accommodation in our rural area, including bunk house provision & holiday parks"

If the application for change of use is approved, we would suggest that the following requirement is met:

- A full business plan is submitted including financial forecasts, marketing information & job creation