

FLINTSHIRE COUNTY COUNCIL

REPORT TO: **PLANNING COMMITTEE**

DATE: **WEDNESDAY, 2 MARCH 2022**

REPORT BY: **CHIEF OFFICER (PLANNING, ENVIRONMENT AND ECONOMY)**

SUBJECT: **063512 - FULL APPLICATION - PROPOSED SITING OF 49 STATIC HOLIDAY CARAVANS AND LODGES ON FORMER GOLF PRACTICE AREA TOGETHER WITH SUPPLEMENTAL LANDSCAPING AT PENNANT PARK GOLF CLUB, MERTYN DOWNING LANE, MOSTYN**

APPLICATION NUMBER: **063512**

APPLICANT: **MESSRS R & I JONES**

SITE: **PENNANT PARK GOLF CLUB, MERTYN, DOWNING LANE, MOSTYN, HOLYWELL**

APPLICATION VALID DATE: **9/9/21**

LOCAL MEMBERS: **COUNCILLOR P HEESOM**
COUNCILLOR C DOLPHIN (ADJACENT COMMUNITY)

TOWN/COMMUNITY COUNCIL: **MOSTYN COMMUNITY COUNCIL**

REASON FOR COMMITTEE: **SCALE OF DEVELOPMENT RELATIVE TO DELEGATION SCHEME**

SITE VISIT: **NO**

1.00 SUMMARY

1.01 This full application proposes the siting of 49 No static holiday caravans and lodges with supplemental planting on the site of a former golf practice area, associated with Pennant Park Golf Club, Mertyn, Downing Lane, Mostyn, Holywell.

1.02 For Members' information, the application site itself is located within the Community of Mostyn, although vehicular access to the site from a northerly direction off the A55 is obtained through the Community of Whitford. Consultation on the application has therefore been undertaken with both Local Members and Community Councils.

2.00 RECOMMENDATION: TO REFUSE PLANNING PERMISSION FOR THE FOLLOWING REASONS

2.01 1 The proposal would represent overdevelopment of the site which in the absence of an overall masterplan and public protection /drainage / ecological strategies does not represent positive place making or embrace the objectives of good design as the development fails to respond to the existing site and surrounding context, in terms of how and at what appropriate density the development can be successfully integrated into the site and surroundings. This is contrary to paragraph 3.3 of Planning Policy Wales (PPW) -Edition 11, Technical Advice Note 5 – Nature Conservation & Planning, Circular 008/2018 – Planning Requirements for Private Sewerage in New Development, Supplementary Planning Guidance Note 8,- Nature Conservation and Planning, together with criteria c & d of Policy STR1, criteria a, b, c & l of Policy GEN1,criterion a of Policy D1,criterion b of Policy D2, and Policies WB1 and T5 of the Flintshire Unitary Development Plan.

2 The proposal would result in an increase in vehicle movements which would conflict with the safe use of Public Bridleway 6 and Public Footpath 9 which run adjacent to the entrance into the site. This is contrary to criterion c of Policy STR1, criteria b & e of Policy GEN1 and Policies AC2 and AC13 of the Flintshire Unitary Development Plan.

3.00 CONSULTATIONS

3.01 Local Member
Councillor P Heesom

Preliminary views are that the application should be refused as the proposal :-

- would not be in accord with established planning policy
- would represent overdevelopment of the site
- would have a detrimental impact on footpaths/ bridleways and drainage
- would reduce linkages with the existing golf course

Councillor C Dolphin

No response received at time of preparing report

Mostyn Community Council

No response received at time of preparing report

Whitford Community Council

- a) Proposal does not comply with Policy T5 of the Flintshire Unitary Development Plan representing a 67% increase in number of units which would have a detrimental impact on open countryside
- b) Detrimental impact on highway safety
- c) 2 No existing permissions for holiday accommodation units remain undeveloped

Highway Development Control

Following the submission of a Transport Assessment, raise no objection subject to the imposition of conditions in respect of :-

- i) restricting the membership numbers of the golf course to 250; and
- ii) provision of parking /turning facilities within each plot

Community and Business Protection

No objection in principle, although it is noted that given the potential conflict between users of the golf course / occupiers of the proposed units that there will be a need to undertake a risk assessment and secure a site licence for the proposed works.

Welsh Water/Dwr Cymru

Note that the applicant intends to use an alternative to mains foul drainage. Should circumstances change request re-consultation on the application.

Natural Resources Wales

Object to the development as the application has failed to demonstrate in accordance with Welsh Office Circular 008/2018, that it is not possible to connect the proposed development to the main foul drainage system.

Public Rights of Way (PROW)

Recommend that permission be refused due to the potential conflict of increased vehicular movements with users of a public bridleway along the site entrance.

Ramblers Cymru

Object to the development for the following reasons

- i) conflict between additional vehicle movements and bridleway
- ii) proposal is contrary to planning policy
- ii) overdevelopment of the site.

Council Ecologist

Express concerns that the proposals for further holiday accommodation do not provide for a co-ordinated approach to

safeguarding protected species and their habitats, including mitigation where necessary.

4.00 PUBLICITY

4.01 Press Notice, Site Notice, Neighbour Notification

26 No letters of objection received , the main points of which can be summarised as follows:-

- Inadequacy of access to serve further development
- Detrimental impact on living conditions of occupiers of nearby properties
- Conflict between increased vehicular movements and safety of users of existing footpaths and bridleway
- No need – Of 73 previously consented lodges / caravans only 18 have been completed
- Overdevelopment of site which would be detrimental to its character and wider landscape

5.00 SITE HISTORY

5.01 99/1013 – Erection of a two storey clubhouse
Approved 15/11/99

01/1301 – Change of use to stewards accommodation
Approved 4/2/02

035905 – Extension to clubhouse
Approved 24/7/03

038988 – Siting of 15 No timber clad caravans and associated roads
Approved 19/8/05

049812 – Siting of 18 No static caravans.
Refused 2/11/13 Appeal Allowed 21/1/14

055928 – Re layout of 18 No caravans previously approved
Approved 19/10/16

056376 – Siting of 14 No additional twin unit timber clad lodges
(caravans) with associated landscape planting
Approved 30/3/17

058311 – Siting of 26 No static holiday caravans together with
additional and supplemental landscaping.
Permitted 12/11/18

6.00 PLANNING POLICIES

6.01 Flintshire Unitary Development Plan

Policy STR1 – New Development

Policy STR6 – Tourism

Policy GEN1 – General Requirements for Development

Policy GEN3 – Development in the Open Countryside

Policy D1 – Design Quality, Location and Layout

Policy D2 – Design

Policy D3 – Landscaping

Policy WB1 – Species Protection

Policy AC2 – Pedestrian Provision and Public Rights of Way

Policy AC13 – Access and Traffic Impact

Policy AC18 – Parking Provision and New Development

Policy SR3 – Golf Facilities

Policy T5 – Extension of Existing Static Caravan and Chalet Holiday Sites

Supplementary Planning Guidance (SPGN)

SPGN 2 – Landscaping

SPGN 4 – Trees and Development

SPGN 8 – Nature Conservation and Development

SPGN 11 – Parking Standards

Caravan Site Licence Conditions for Static Sites 2003

National Planning Policies and Guidance

Planning Policy Wales (PPW) – Edition 11 (Feb 2021)

Future Wales – The National Plan 2020-2040

Technical Advice Note 5 – Nature Conservation and Planning

Technical Advice Note 12 – Design

Technical Advice Note 18 – Transport

Welsh Office Circular 008/2018 – Planning Requirements for Private Sewerage in New Development

Caravan Sites & Control of Development Act 1960

7.00 PLANNING APPRAISAL

7.01 Introduction

Pennant Park Golf Club is an 18 hole private golf course located approximately 1.5km to the east of Whitford and 3km to the west of Holywell. Direct vehicular access to the site can be obtained from the A55 through Whitford, with linked access from the A548 Coast Road along Downing Road.

7.02 Associated with the golf club, there is planning permission for a total of 73 No holiday accommodation units, as referenced in paragraph 5.00 of this report. These have been granted by virtue of the following permissions:

038988 – 15 No twin unit static holiday caravans on land to the east of the main access track

048912 – 18 No static holiday caravans allowed on appeal on land to the north of the main club house

056376 – 14 No timber clad lodges (caravans) on land to the west of that forming application 038988

058311 – 26 No static holiday caravans on land to the south of the area forming 048912

It is important to reference that of the 73 No units permitted between 2005 to date, that only 18 have subsequently been completed.

7.03 Proposed Development

This current application seeks planning permission to develop the former practice area associated with the golf club, for the siting of an additional 49 No holiday accommodation units. This area of land which amounts to approximately 2.5 hectares in area, is located approximately 60m to the north of the existing clubhouse. The agent has advised that this practice area is no longer used.

7.04

The plans submitted as part of this application propose the siting of:-
i) 42 No single width caravans measuring approximately 12.3m x 3.7m x 3.3m (high)
ii) 7 No twin unit caravans measuring approximately 12.2m x 6.1m x 4.1m (high)

The external walls of the units are proposed to be of timber effect cladding (various colours) with slate effect metal roofs (dark grey)

7.05

The site is located in the middle of the golf course, associated with the development, the proposal being to re-align the 10th hole on the course on the grounds of Health & Safety, to seek to prevent any stray golf balls entering the site. It is proposed that the caravans and lodges would be accessed principally from the existing car park, with 6 No units accessed from an existing track on the golf course. The units are proposed to be focussed around a central greenspace within the site layout.

7.06 Main Planning Issues

It is considered that the main issues to be taken into account in determination of this application include:-

- i) The principle of development and impact
- ii) Impact of development on the character of the site and wider surroundings
- iii) Impact of development on existing bridleway
- iv) Adequacy of access

- v) Impact on ecology / habitat
- vi) Adequacy of drainage
- vii) Impact on Health & Safety

7.07

Principle of Development

Policy T5 of the Flintshire Unitary Development Plan allows consideration to be given to the extension of existing static caravan and chalet holiday sites, subject to compliance with specific criteria, which includes:

- a) any increase in the number of standings or units being marginal
- b) the proposal involves only a modest physical extension of the site area
- c) the scheme incorporates substantial internal and structural landscaping, demonstrates significant improvement to the environment of the site and a reduction of its impact on the surrounding landscape
- d) the proposal involves improved on-site facilities; and
- e) the proposal would not have a significant adverse impact on the amenity of nearby residents, other users of nearby land/property or the community in general.

These issues are addressed in further detail below

7.08 Scale of Development and Impact on Character of Site / Surroundings

This application proposes an increase in the number of holiday accommodation units on the site from the 73 already consented, to a total of 122

7.09 It is noted that these existing permissions have been permitted on different parcels of land within the complex, but developed in an individual speculative form, without any reference to an overall master plan for the site.

7.10 The proposal for a further 49 No units would represent i) an approximate 42% increase on the number of units already in situ and ii) an approximate 67% increase in the number of units already with the benefit of planning permission.

7.11 The justification and explanation to Policy T5 of the Flintshire Unitary Development Plan indicates that “provided the increase in the number of units proposed is marginal i.e. no greater than 10% and the number of units does not unacceptably harm the appearance of the site, that this will be acceptable.

7.12 It is also important to consider the proposal in the context of Planning Policy Wales (PPW) which states in paragraph 3.3 that good design is fundamental to creating sustainable places where people want to live, work and socialise. It also states that design must include how space is used, how buildings and the public realm support this use,

as well as its construction, operation, management and its relationship with the surrounding area. It recognises that design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places. In paragraph 3.4 PPW urges that for all those involved in the development process that the aim for all should be to meet the objectives of good design, applied to all development at all scales

- 7.13 Whilst the submitted plans propose the siting of 49 No units around a central open space area, it is considered that the proposals would represent overdevelopment. This is characterised by a very regimented layout, which gives the appearance of a dense housing development. This it is considered would be harmful to the character and appearance of the site and wider surroundings.
- 7.14 This current proposal which represents the largest number of holiday units in a single submission on the site would in my view and based on its cumulative impact i) alter the nature / balance of uses at this location and ii) reduce the range of golf facilities on offer which underpin its tourism offer
- 7.15 Impact on Existing Bridleway
Public Bridleway No 6 in the Community Of Whitford and Public Footpath 9 which links to the bridleway run alongside the main vehicular access into the site.
- 7.16 Consultation on the application has been undertaken with the Council's Public Rights of Way (PROW) team, with it being confirmed that the authority is responsible for maintaining the bridleway for users on foot and on horseback.
- 7.17 PROW consider that any additional traffic on this lane will only further contribute to its degradation, the route being popular with horse riders with there being a blind bend on the access track which throws horse riders into direct conflict with vehicles.
- 7.18 It is noted by PROW that Pennant Park is an active golf club which already utilises the public bridleway as its main track. Furthermore, there has already been 73 lodges/caravans consented to with various applications in the past ten years. While some of these have not yet been constructed, if another 49 are consented to, it is going to further increase the danger for horse riders and people on foot. Public Bridleways should ideally be left on such a condition where they are not tarmaced as this is detrimental to horse riders generally. The proposal, would increase the need for routes to be surfaced which would be contrary to the guidance for public rights of way and surfaces.

- 7.19 In addition, PROW express concerns that this current application would bring the total of approved holiday units on the site to 122. If this number of units had been proposed under one single application, PROW would object due to the damage it would do the rights of way network and its users. Whilst noting that PROW have not objected to previous submissions an objection to the cumulative impact of development is made which would see an increase to the already approved 73 caravans/lodges.
- 7.20 Adequacy of Access
Consultation on the application has been undertaken with the Highway Development Control Manager, who in recognising the previous background of planning history at this location, has sought clarification and additional information from the applicant / agent regarding traffic generation associated with the proposed development.
- 7.21 Based on this submitted data, taking into account vehicular movements associated with both the golf club and the additional 49 No units, the Highway Development Control Manager confirms that there is no objection to the principle of development. This is however subject to the imposition of conditions restricting membership of the golf club to 250 with the associated provision of facilities within each plot for the parking and turning of vehicles.,
- 7.22 Ecological Impact
Consultation on the application has been undertaken with the Council Ecologist who advises that the application site is in close proximity to Coed Nant y Bi Wildlife Site an Ancient Woodland, with a small ancient woodland to the east adjacent to the Bridleway where the hedge banks also indicate ancient woodland remnants. There are numerous records of protected species with high potential for bats plus amphibians associated with the golf course ponds.
- 7.23 The site itself, as a driving range is managed grassland of limited ecological value with an avenue of planted trees to the west and mature trees to the north east with an overgrown hedge to the north. There is potential to enhance these features within the application. The Council Ecologist confirms that whilst discussions with the applicant have taken place regarding a Preliminary Ecological Appraisal the main issue is the piecemeal approach to the caravan developments.
- 7.24 The Council Ecologist advises that individually each lodge application site does not have high ecological value but the piecemeal approach does not enable a comprehensive plan for the site e.g. with regards to landscaping and incorporation of biodiversity enhancement through the use of native species and minimization of new lighting. An ecological assessment of the whole site would have identified the habitats associated with existing permissions and while not directly

affected, tree and shrub planting should be introduced to provide additional buffers. It is considered that a masterplan showing features to be protected, new landscape proposals and sensitive lighting for the caravan developments would help to alleviate the piecemeal nature of the applications that have been submitted.

7.25 Adequacy of Drainage

The applicant proposes that foul drainage from the development is discharged to a private sewage system, utilising and increasing the capacity of the system previously proposed for the 26 No units permitted under 058311, and 18 No units to the north of the existing clubhouse.

7.26 Following initial concerns expressed by Natural Resources Wales (NRW) to the acceptability of this approach having regard to Circular 008/2018, and the need to consider as a first option, linkage into the existing mains network, additional drainage information has been submitted. Further consultation with NRW has been undertaken on this additional information.

7.27 As a result, NRW maintain an objection to the development, at this stage, advising that the applicant has failed to provide satisfactory evidence to demonstrate that it is not reasonable or practicable to connect to the main system.

7.28 Health & Safety

Consultation on the application has been undertaken with the Council's Community and Business Protection Team. Whilst no objection to the principle of development has received, it is noted that accompanying works associated with the development include the re-alignment of the 10th hole on the existing golf course. This is proposed to avoid conflict between the users of the golf course and occupiers of the proposed units from stray golf balls. It is considered by the Community and Business Protection Team, that this relationship should be the subject of a Risk Assessment, the proposals if approved also requiring a site licence under the Caravan Sites and Control of Development Act 1990.

8.00 CONCLUSION

8.01 Pennant Park Golf Club has had a number of planning applications permitted since 2005 to allow for the siting of a total of 73 No holiday accommodation units, proposed in the absence of an overall masterplan for development of the site.

8.02 It is important to note that only 18 of the consented 73 units have been completed to date, the full impact of this scale of development yet to be realised from landscape, highway and ecological perspectives.

8.03 It is considered that a further 49 No units as proposed would represent overdevelopment and be unacceptable given the potential safety implications associated with the increased usage of the site and proximity to the public footpath and bridleway network in the locality.

8.04 The applications at this location have been submitted in a piecemeal fashion, this current proposal raising concerns in respect of ecology and drainage, including concerns that development does not represent positive place making in accordance with Planning Policy Wales (PPW)/ It is therefore recommended accordingly.

8.01 Other Considerations

The Council has had due regard to its duty under Section 17 of the Crime and Disorder Act 1998 and considered that there would be no significant or unacceptable increase in crime and disorder as a result of the recommended decision.

The Council has acted in accordance with the Human Rights Act 1998 including Article 8 of the Convention and in a manner which is necessary in a democratic society in furtherance of the legitimate aims of the Act and the Convention.

The Council has had due regard to its public sector equality duty under the Equality Act 2010.

The Council has had due regard to its duty under Section 3 of the Wellbeing of Future Generations (Wales) Act 2015 and considered that there would be no significant or unacceptable impact upon the achievement of wellbeing objectives as a result of the recommended decision.

LIST OF BACKGROUND DOCUMENTS

Planning Application & Supporting Documents
National & Local Planning Policy
Responses to Consultation
Responses to Publicity

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