

Development Management

Development and Environment

North Somerset Council

Post Point 15

Town Hall

Weston-super-Mare

BS23 1UJ

**Date:** December 7<sup>th</sup> 2017

**Ref:** EIA screening opinion request

To whom it may concern,

**Description:** Change of use of land from agricultural land to use as a caravan site

**Location:** Land Adjacent To Wayacre Drove and Accommodation Road Bleadon

In accordance with Regulation 5(1) of the Town and Country Planning Act (EIA) Regulations 2011, we request that North Somerset Council provides a formal screening opinion to confirm whether or not it is considered that the proposed scheme comprises EIA development.

The proposals do not fall under Schedule 1 development and therefore there is no automatic requirement for an EIA. The site falls under Schedule 2 development, item 12 Tourism and Leisure e) Permanent camp site and caravan sites, where a threshold is set at 1 hectare. The site in question is 0.9 hectares and so falls outside of the threshold. However the site area is close to the threshold and could be considered in a sensitive location, albeit a well screened location.

Government guidance states that EIA will be needed for Schedule 2 projects in three main types of cases:

- for major projects which are of more than local importance;
- occasionally for projects on a smaller scale which are proposed for particularly sensitive or vulnerable locations;
- in a small number of cases, for projects with unusually complex and potentially adverse environmental effects; where expert and detailed analysis of those effects would be desirable and would be relevant to the issue of principle as to whether or not the development should be permitted.

Furthermore The National Planning Practice Guidance that supersedes Circular 02/99 deals with proposals relating to 'Tourism and Leisure' under Section 12 of the Annex for Indicative Screening Thresholds. For permanent camp sites or caravan sites it says the main considerations are where there are more than 200 pitches and the key issues will be visual impacts, impacts on the ecosystems and traffic generation.

Given that Model Standards 2008 for Caravan Sites in England: Caravan Sites and Control of Development Act 1960, does not cover density in any detail and merely states, *The density of caravans shall be consistent with safety standards and health and safety requirements*. The site can only generate a total number of pitches based on a gross density not exceeding 50 caravans to the hectare, calculated on the basis of the useable area (excluding lakes, roads, communal services and other areas unsuitable for the siting of caravans) rather than total gross site area. Therefore based on 0.9ha the maximum number of units achievable would be circa 45. However in reality it is likely to be a lot less than this figure.

It is our opinion that the development proposed does not fall into any of the above categories and any concern may centre around the projects of a smaller scale which are proposed for particularly sensitive or vulnerable locations.

The site is within the coastal zone between the Mendips and the sea. It carries no national or statutory designations and is Grade 3 agricultural land. In the North Somerset Landscape Character Assessment it is within the area known as the Bleadon Moor landscape character area. It lies adjacent to the Mendip Ridge landscape character area. An SNCI is nearby, ponds at Summerways Bridge but is separated from the site in question by Accommodation Road, Summerways Bridge and the main line railway.

The guidance is quite explicit in that it states occasionally, and particularly sensitive or vulnerable locations.

Therefore it is our opinion that the site does not fall within a particularly sensitive or vulnerable location when measured against the criteria set out in the NPPG.

As the application is for a change of use on a well screened site the type of development, being temporary and easily restored to current uses are minimal to insignificant in nature and there is minimal to no risk of contamination.

We consider this proposed change of use application falls outside of the requirements of an EIA and look forward to receiving your formal screening opinion within 3 weeks.

Please find attached site location plan.

Yours sincerely

Ricki Burrows

Director of Urban Design

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Affiliate of the RTPI

