

TORBAY COUNCIL

Application Site Address	Waterside Holiday Park Dartmouth Road Paignton TQ4 6NS
Proposal	Construct a new raised external decking structure to the north and east of the existing clubhouse building. Convert the existing clubhouse building to contain a new indoor swimming pool, bar and restaurant area, staff accommodation and back of house spaces. Convert the existing "Smugglers Inn" building to provide 2no holiday apartments to the upper floor, new glass balustrade to the perimeter of the roof terrace, staff accommodation to the lower floor. Use of land previously occupied by the external swimming pool for 4no static caravans. Demolition of existing lodge and dwelling adjacent to Dartmouth Road and the construction of 3no static caravans.
Application Number	P/2021/0706
Applicant	Park Holidays UK Ltd
Agent	Mr Ian Butter - Rural & Urban Planning Consultancy
Date Application Valid	19/10/2021
Decision Due date	14/12/2021
Extension of Time Date	Not applicable
Recommendation	Conditional approval subject to: <ul style="list-style-type: none"> • The resolution of any issues relating to flood risk to the satisfaction of Officers; • Completion of a S.106 unilateral undertaking for the holiday units towards mitigating in-combination recreational impacts on the SAC; • The conditions detailed below. Final drafting of conditions, and addressing any further material considerations that may come to light following Planning Committee, to be delegated to the Divisional Director responsible for Planning, Housing and Climate Emergency.
Reason for Referral to Planning Committee	The application has been referred to Planning Committee because the proposed development is on land owned by Torbay Council and the application has received objections.
Planning Case Officer	Emily Elliott

Location Plan:



Site Details

The site is Waterside Holiday Park which is located off of the Dartmouth Road, and accessed from Waterside Road, Paignton. Waterside Holiday Park is approximately 5.85 hectares and consists of over 200 caravan/lodges with the main clubhouse, outdoor swimming pool and a separate two storey building called 'Smugglers' which comprises a restaurant to the upper floor and back of house spaces to the lower ground floor. The main clubhouse houses the main bar, entertainments hall, arcade and ancillary facilities on the upper ground floor. The lower ground floor consists of the sales office, reception/shop and back of house spaces.

Description of Development

The proposal seeks permission for:

- The construction of a new raised external decking structure to the north and east of the existing clubhouse building.
- The conversion of the existing clubhouse building to contain a new indoor swimming pool, bar and restaurant area, staff accommodation and back of house spaces.
- The conversion of the existing "Smugglers Inn" building to provide 2no holiday apartments to the upper floor, new glass balustrade to the perimeter of the roof terrace, and staff accommodation to the lower floor.
- Use of land previously occupied by the external swimming pool for 4no static caravans.
- Demolition of existing lodge and dwelling adjacent to Dartmouth Road and the construction of 3no static caravans.

Pre-Application Enquiry

Not applicable.

Relevant Planning Policy Context

Section 38(6) of the Planning and Compulsory Purchase Act 2004 places a duty on local planning authorities to determine proposals in accordance with the development plan unless material considerations indicate otherwise. The following development plan policies and material considerations are relevant to this application:

Development Plan

- The Torbay Local Plan 2012-2030 ("The Local Plan")
- The Brixham Peninsula Neighbourhood Plan 2012-2030
- The Paignton Neighbourhood Plan 2012-2030

Material Considerations

- National Planning Policy Framework (NPPF)
- Planning Practice Guidance (PPG)
- Published standing Advice

- Planning matters relevant to the case under consideration, including the following advice and representations, planning history, and other matters referred to in this report:

Relevant Planning History

Extensive planning history relating to the site.

Summary of Representations

The application was publicised through a site notice and neighbour notification letters. 2 letters of objection have been received.

Concerns raised in objection include:

- Overdevelopment
- Privacy/overlooking
- Traffic and access
- Noise

Summary of Consultation Responses

Brixham Peninsula Neighbourhood Forum:

No response received.

Broadsands, Churston and Galmpton Neighbourhood Forum:

No response received.

Paignton Neighbourhood Forum:

No response yet received.

Torbay Council's Tree and Landscape Officer:

No obvious arboricultural issues are raised however owing to the proximity of trees to some of the buildings please can we seek assurances that no trees are proposed for removal. A landscape scheme will need to be submitted and approved prior to commencement.

Torbay Council's Environmental Health Officer:

No objections.

Police Designing-Out Crime Officer:

The police would like to raise the following consideration having reviewed the documents and plans.

Crime, fear of crime, ASB and conflict are less likely to occur if the following attributes of Crime Prevention through Environmental Design (CPtED) are also considered in the design and layout of the proposed scheme:-

- Access and movement (Permeability) - Places with well-defined routes, spaces and entrances that provide for convenient movement without compromising security.
- Structure – (Design & Layout) - Places that are structured so that different uses do not cause conflict
- Surveillance (Natural, Formal & Informal) - Places where all publicly accessible spaces are overlooked.
- Ownership - Places that promote a sense of ownership, respect, territorial responsibility and community.
- Physical protection - Places that include necessary, well-designed security features.
- Activity - Places where the level of human activity is appropriate to the location and creates a reduced risk of crime and a sense of safety at all times.
- Management and maintenance - Places that are designed with management and maintenance in mind, to discourage crime in the present and the future.

Site specific details

Whilst the proposed clubhouse will potentially benefit from higher levels of natural surveillance from increased footfall and staffing numbers, this obviously will not be the case outside of opening hours. Therefore, a sensible and practical level of security, which will not adversely affect the efficient running of the centre, is essential to help create a successful and sustainable visitor experience. Doors to private areas such as staff offices, safe, stock and plant rooms should have a form of access control. External doors and windows are recommended to be independently security tested and certificated products to an appropriate nationally recognised standard such as PAS24:2016 or similar. The provision and use of CCTV fits well within the overall framework of a security management plan but it should not be relied upon as a panacea to all criminal and anti-social behaviour. To deter and prevent unauthorised access to the building when not in use, it is recommended that enhanced security standards and specifications for doors and windows are considered, especially given the sites isolated rural location, as even the best CCTV and lighting can easily be undermined by an offender concealing their identity by wearing a hood, hat, mask etc. It is my understanding that the building itself will also be fitted with a monitored intruder alarm. Any proposed lighting scheme should be co-ordinated with any CCTV installation. Access beyond the reception area to offices/staff facilities, store rooms, plant rooms, cleaning and chemical stores must be limited to 'staff' only by way of suitable access control, for example, a simple keypad entry system.

South West Water:

Proposal: Construct a new raised external decking structure to the north and east of the existing clubhouse building. Convert the existing clubhouse building to contain a new indoor swimming pool, bar and restaurant area, staff accommodation and back of house spaces. Convert the existing "Smugglers Inn" building to provide 2no holiday

apartments to the upper floor, new glass balustrade to the perimeter of the roof terrace, staff accommodation to the lower floor. Use of land previously occupied by the external swimming pool for 4no static caravans.

With reference to the planning application at the above address, the applicant/agent is advised to contact South West Water if they are unable to comply with our requirements as detailed below.

Clean Potable Water

South West Water is able to provide clean potable water services from the existing public water main for the above proposal. The practical point of connection will be determined by the diameter of the connecting pipework being no larger than the diameter of the company's existing network.

Foul Sewerage Services

South West Water is able to provide foul sewerage services from the existing public foul or combined sewer in the vicinity of the site. The practical point of connection will be determined by the diameter of the connecting pipework being no larger than the diameter of the company's existing network.

The applicant can apply to South West Water for clarification of the point of connection for either clean potable water services and/or foul sewerage services. For more information and to download the application form, please visit our website:
www.southwestwater.co.uk/developers

Surface Water Services

The applicant should demonstrate to your LPA that its prospective surface run-off will discharge as high up the hierarchy of drainage options as is reasonably practicable (with evidence that the Run-off Destination Hierarchy has been addressed, and reasoning as to why any preferred disposal route is not reasonably practicable):

1. Discharge into the ground (infiltration); or where not reasonably practicable,
2. Discharge to a surface waterbody; or where not reasonably practicable,
3. Discharge to a surface water sewer, highway drain, or another drainage system; or where not reasonably practicable,
4. Discharge to a combined sewer. (Subject to Sewerage Undertaker carrying out capacity evaluation)

Having reviewed the applicant's current information as to proposed surface water disposal for its development, please note that method proposed within the Flood Risk Assessment to discharge into the ground (infiltration) is acceptable and meets with the Run-off Destination Hierarchy.

Having reviewed the current information in the application form, with regards surface water disposal for the development, please note that, should infiltration prove not feasible, this method proposed to discharge into a public surface water sewerage network would be acceptable and meets with the Run-off Destination Hierarchy.

Torbay Council's Drainage Engineer:

Although the applicant has correctly identified that the proposed development lies within Flood Zone 1, he has failed to identify that the development site is susceptible to surface water flooding as identified on the Environment Agency's long term flood risk information.

Where sites are identified within areas susceptible to surface water flooding the developer is expected to submit a site specific flood risk assessment. The flood risk assessment must demonstrate that the development will be safe from all sources of flooding without increasing flood risk elsewhere and where possible will reduce flood risk overall. Within the site specific flood risk assessment I would have expected to see the sources and predicted depth of flooding being identified, the proposed finished floor levels for the basement and ground floor, details of safe access and egress routes, details about what to do in an emergency including safe refuges, details of flood mitigation measures being proposed including an emergency flood plan. For the building.

The developer has submitted a simple site specific flood risk assessment however within this it only identifies that the site lies within Flood Zone 1 and does not identify the surface water flood risk. As a result, the submitted flood risk assessment fails to address the items raised in point 2 above.

Within the application form the developer has identified that surface water run off from the development will discharge to the combined sewer system. No justification has been submitted to demonstrate that the use of soakaways or sustainable drainage is not feasible. In accordance with the requirements of the Torbay Critical Drainage Area the developer must investigate the use of soakaways/sustainable drainage and only if this is not feasible will a controlled discharge to a watercourse, surface water sewer or combined sewer be allowed.

Before planning approval is granted the developer must submit a detailed site specific flood risk assessment and provide details of how the surface water drainage is to be discharged. If this is not to using soakaways or sustainable drainage, the developer must supply details of why these are not feasible.

Environment Agency:

No response received.

Devon County Council's Ecologist:

South Hams SAC

The proposed development will not lead to the loss, damage, or disturbance to potential greater horseshoe bat commuting routes and foraging habitats. Nor will it lead to the loss damage or disturbance to a pinch point or an existing mitigation feature. This is due to the localised nature of the development in an urban, developed area, and the lack of suitable GHB habitat on site and in the surrounding area.

In line with the South Hams SAC Habitats Regulations Assessment Guidance document (DCC et al.,2019), and given the above, this project will not have a likely significant effect on the South Hams SAC population of Greater Horseshoe Bats either alone or in-combination.

SAC Recreation Zone for Berry Head Country Park:

The development falls within the SAC Recreation Zone for Berry Head Country Park, where the potential for recreational pressure due to new developments may affect the wildlife interests of the Berry Head component of the South Hams SAC. Qualifying features include calcareous grassland and sea cliffs (with their associated species).

In the absence of mitigation, it is deemed that this development could, in combination with other plans and projects, have a Likely Significant Effect on the South Hams SAC due to recreational impacts on the calcareous grassland and so Appropriate Assessment is needed.

Appropriate Assessment:

For non-CIL liable developments such as this, applications for additional tourist accommodation or additional dwellings within the Brixham Peninsula Neighbourhood Plan Area are required to pay a Section 106 contribution of £131 per holiday unit and £95 per new dwelling in order to offset the resultant additional recreational pressure on the calcareous grassland at the Berry Head to Sharkham Point Component of the South Hams Special Area of Conservation.

Therefore, if approved, these holiday units would be required to pay s.106 contributions towards mitigating in-combination recreational impacts on the SAC.

HRA Conclusion:

With this measure secured, there will be no adverse effect on the integrity of the SAC.

Lyme Bay and Torbay SAC

The site is approximately 300m west of Lyme Bay and Torbay SAC. The development would result in an additional 9 holiday units within 300m of Lyme Bay and Torbay SAC interest features. Qualifying features are reefs, sea caves and great white sharks.

The potential threat of increased public access and disturbance to the sea caves has been raised in the SAC Site Improvement Plan (SIP) –

The SIP states however, that this issue is being addressed through the promotion of Codes of Conduct and a coastering licencing scheme led by the Torbay Coast and Countryside Trust. It is therefore considered that this proposal will not result in a Likely Significant Effect on the SAC either alone or in-combination with other Plans and Projects.

There is potential for an increase in waterborne pollutants to be produced and enter controlled water during the construction phase of development. In addition, new holiday development could increase the demand on foul water systems.

In the absence of mitigation, it is deemed that this development could, in combination with other plans and projects, have a Likely Significant Effect on the Lyme Bay and Torbay SAC due to pollution impacts and so Appropriate Assessment is needed.

Appropriate Assessment:

A Construction and Environmental Management Plan (CEMP) will be submitted and agreed with the LPA. This document will provide measures of construction controls on dust and reducing contaminated run-off.

Details of pollution control measures, including mitigation for the increased demand on foul water systems, post-construction will be submitted and agreed with the LPA. The CEMP and any required pollution control measures will be conditioned as part of any planning permission.

HRA Conclusion:

With these mitigation measures secured, there will be no adverse effect on the integrity of the SAC.

Torbay Marine Conservation Zone

The site is approximately 300m west of Torbay Marine Conservation Zone (MCZ). Qualifying features of 11 habitats and 3 species, including seagrass beds, intertidal mud, native oyster, long-snouted seahorse, and peacock's tail.

In view of the nature of the application for the clubhouse, holiday apartments, holiday caravans, and facilities, one impact pathway has been identified that have the potential to affect the interest features of the MCZ:

- Effects on water quality - Dust, sediment and pollutants reaching the MCZ through either discharge into local water courses, leaching through contamination of ground water, and/or transmission of dust through the air; and increased demand on drainage capacity and the foul sewer infrastructure.

In the absence of mitigation, it is deemed that this development could, in combination with other plans and projects, have a Likely Significant Effect on the Torbay MCZ due to pollution impacts.

Effects of increased recreational pressure have been screened-out as this is a low-risk application with respect to the increase in mooring and anchoring and given the small total net increase anticipated from this development compared with the total number of Torbay visitors, and so no mitigation is required.

The CEMP and any required pollution control measures including mitigation for the increased demand on foul water systems, post-construction will be conditioned as part of any planning permission, will be submitted and agreed with the LPA.

With these mitigation measures secured, there will be no adverse effect on the integrity of the MCZ.

No mitigation required for recreational pressures.

Other SSSIs

There will be no impacts on Sugar Loaf Hill SSSI and Saltern Cove SSSI due to localised nature of this development and a previously developed area and a lack of impact pathways.

European Protected Species

Conditions to include:

- No external lighting shall be installed at any time at the application site without the written permission of the Local Planning Authority.
- Development shall be carried out in accordance with the actions set out in the Bat Survey Assessment reports.
- No demolition shall take place during the bird nesting season (01 March to 31 August, inclusive) unless the developer has been advised by a suitably qualified ecologist that the clearance will not disturb nesting birds and a record of this kept.

The full response can be found on the Council's website.

Natural England:

No response received.

Torbay Council's Senior Strategic Planning Officer:

In terms of the Torbay Development Plan:

- Torbay Local Plan 2012-2030, the Waterside Holiday Park is subject to the Urban Landscape Protection Area Policy C5.46 Waterside, Goodrington. The Council carried out an evidence base Review of ULPAs and this document should be considered in any LVIA if the value of the ULPA might be undermined. There appears to have been some clearance near to the Waterside Road boundary.
- Policy TO1 Supports the principle the improvement of existing and provision of new tourist accommodation and attractions, subject to other Policies in this Plan. Policy

TO2 seeks to protect facilities and accommodation outside that make a major contribution to the tourism offer. The site and has several designations abutting, including the SSSI, Local Nature Reserve, and Local Wildlife site, SWCP(SS6) and C3 Coastal Change Management area (C2 undeveloped coast). Strategic Transportation colleagues will comment with regard to the sustainable transport measures including EVC, access and the walking and cycling network (Policies TA1, TA2, TA3).

- The Council does not have a three or Five Year Housing Land Supply and the proposal includes the demolition of a detached 'family sized' dwelling (property 153 Dartmouth Road) and replacement with three mobile holiday homes. Therefore, the loss of even a single dwelling should be given moderate weight (considered in the context of the Council's declared housing crisis, the ambition of Policies SS1, and SS13 and NPPF) alongside the benefits of the proposal to the holiday park and its contribution towards Torbay as a Premier Resort (Policy TO1).
- Subject to any direct site deliverability requirement, the commercial developments threshold (1000 sq m), sets out when wider section 106 contributions to offset impacts on biodiversity, open space and transport etc. can be sought. Policy SS5 of the Local Plan and the Planning Contributions SPD relate.
- The Brixham Peninsula Neighbourhood Plan still applies, was recently "made" and is up to date for applications not involving the supply of housing. However, one does need to be conscious of the new BCG Forum Area and the PNP boundary amendment cutting through the site. The Forums make may separate representations but in terms of the adopted BPNP Policies Map (extract below) the Waterside Holiday Park site lies within the BPNP Settlement Boundary (Policy E2) in which '*...proposals for sustainable developments within settlement boundaries will be supported where developments demonstrate good design and follow the guidance in the relevant Design Statement (Policy BH5), abutted by the Local Green Space (Policy E4.16) at Sugar Loaf Hill. BPNP contains Design Statements (under Policies BE1/BH5) and Policies for Tourism TO1 in which '*...developments that increase the quality and range of tourist accommodation and leisure potential in the Peninsula area will be supported...*'*

Key Issues/Material Considerations

1. Principle of Development
2. Impact on the Character of the Area
3. Impact on Residential Amenity
4. Impact on Highway Safety
5. Impact on Ecology and Trees
6. Flood Risk and Drainage

Planning Officer Assessment

1. Principle of Development

The proposal is for the construction of a new raised external decking structure to the north and east of the existing clubhouse building. The conversion of the existing clubhouse building to contain a new indoor swimming pool, bar and restaurant area, staff accommodation and back of house spaces. The conversion of the existing "Smugglers Inn" building to provide 2no holiday apartments to the upper floor, new glass balustrade to the perimeter of the roof terrace, and staff accommodation to the lower floor. Use of land previously occupied by the external swimming pool for 4no static caravans and the demolition of existing lodge and dwelling adjacent to Dartmouth Road and the construction of 3no static caravans.

The Council does not have a three or five year Housing Land Supply and the proposal includes the demolition of a detached 'family sized' dwelling (No.153 Dartmouth Road) and replacement with three static caravans. Therefore, the loss of a single dwelling should be given moderate weight, considered in the context of the Council's declared housing crisis, the ambition of Policies SS1, and SS13 and the guidance contained within the NPPF, alongside the benefits of the proposal to the holiday park and its contribution towards Torbay as a Premier Resort. The existing dwelling can only be vehicularly accessed from within the holiday park. Whilst it is acknowledged that the proposal results in the loss of one dwelling, the proposal offers additional and improved tourist accommodation to contribution towards the tourism economy.

Policy TO1 of the Local Plan supports in principle the improvement of existing and provision of new tourist accommodation and attractions, subject to other policies in the plan. The policy goes on to state that the retention, improvement and creation of new, high-quality tourism and leisure attractions, facilities and accommodation in sustainable, accessible locations would be supported.

Policy TO1 of the Neighbourhood Plan states subject to compliance with the other policies in the Neighbourhood Plan, developments that increase the quality and range of tourist accommodation and leisure potential in the Peninsula area will be supported, especially where it can be demonstrated that the development will lead to the creation of local jobs.

The majority of Waterside Holiday Park lies within the Brixham Peninsula Neighbourhood Plan Settlement Boundary as defined by Policy E2, which states '*...proposals for sustainable developments within settlement boundaries will be supported where developments demonstrate good design and follow the guidance in the relevant Design Statement (Policy BH5).*

In the context of development within the built-up area, there are no Development Plan policies indicating that the proposal is not acceptable in principle. It is important to note that the point of general principle is subject to broader planning policy

considerations and other relevant material considerations, which will be discussed in more detail below.

2. Impact on the Character of the Area

Paragraph 126 of the National Planning Policy Framework (NPPF) states that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. In addition, paragraph 134 states that 'development that is not well designed should be refused, especially where it fails to reflect local design and government guidance on design'. Policy DE1 of the Local Plan states that proposals will be assessed against a range of criteria relating to their function, visual appeal, and quality of public space. Policy BH5 of the Brixham Peninsula Neighbourhood Plan states that all new development should demonstrate good quality design and respect the character and appearance of the surrounding area. Policy PNP1(c) of the Paignton Neighbourhood Plan states that development proposals should where possible and appropriate to the scale and size of the proposal to be in keeping with the surroundings respecting scale, design, height, density, landscaping, use and colour of local materials.

The proposal is for development within the site boundary of the holiday park. The application is supported by a Landscape Masterplan Report. The proposal is for the construction of a new raised external decking structure to the north and east of the existing clubhouse building. The conversion of the existing clubhouse building to contain a new indoor swimming pool, bar and restaurant area, staff accommodation and back of house spaces. The proposed development to the clubhouse is considered to be of a minor scale and the clubhouse is sited within the valley amongst the caravans and largely unseen within its surroundings, therefore such elements of the proposal are considered to be acceptable. The existing swimming pool is proposed to be infilled and 4no. static caravans sited in its place, given the topography of the land and the clubhouse being sited closer to Dartmouth Road, it is considered that the visual impact of such would also be limited.

The proposal also includes the conversion of the existing "Smugglers Inn" building to provide 2no holiday apartments to the upper floor, new glass balustrade to the perimeter of the roof terrace, and staff accommodation to the lower floor. This element of the proposal would have limited visual impact and would only be somewhat noticeable when within the site.

The proposal also includes the demolition of the existing wooden lodge and the two storey dwelling adjacent to Dartmouth Road, to then utilise the land for erection of 3no static caravans, this element of the proposal falls within the Paignton Neighbourhood Plan boundary. This part of the site is mainly shielded from Dartmouth Road given the existing hard boundary treatments. By virtue of the fall of the land from west to east and the presence of a tall solid wall the proposed caravans at this part of the site will not be visible from the Dartmouth Road either from vehicles or by pedestrians. The

existing two storey dwelling is similarly set below road height with only a partial view of the roof and upper floor. The removal of this dwelling is not considered to be detrimental as limited views are possible, therefore it is considered that its removal will not materially impact upon the street scene.

The site is partially located within an area designated as an ULPA as defined by Policy C5 of the Local Plan. Policy C5 specifies that development within an ULPA will only be permitted where:

1. It does not undermine the value of the ULPA as an open or landscaped feature within the urban area; and
2. It makes a positive contribution to the urban environment and enhances the landscape character of the ULPA.

In terms of landscape impact, it is relevant to consider that part of the clubhouse is within the ULPA boundary. It is considered that the application site is mainly screened when viewed from Dartmouth Road, given the topography of the land. The site would be visible from Waterside Road as Waterside Road sits at a higher level than the application site. It is considered that the proposed development would not have a significant adverse impact on the special qualities and characteristics of the ULPA, subject to a suitable landscaping scheme. It is considered that it is possible to develop the site for the type and quantum of development as set out in the proposal without having an unacceptable adverse impact on the ULPA in terms of the proposal not undermining the value of the ULPA as an open or landscaped feature within the urban area and making a positive contribution to the urban environment and enhance the landscape character of the ULPA.

It is considered that the proposed development in terms of visual amenity is acceptable and accord with Policies DE1 and C5 of the Local Plan, Policy BH5 of the Brixham Peninsula Neighbourhood Plan, Policy PNP1(c) of the Paignton Neighbourhood Plan and guidance contained within the NPPF.

3. Impact on Residential Amenity

Policy DE3 of the Local Plan states that all development should be designed to provide a good level of amenity for future residents or occupiers and should not unduly impact upon the amenity of neighbouring and surrounding occupiers. The Brixham Peninsula Neighbourhood Plan is largely silent on the matter of amenity. Policy PNP1(c) of the Paignton Neighbourhood Plan states that development proposals should where possible and appropriate to the scale and size of the proposal protect residential amenity in terms of noise, air, or light pollution. Paragraph 130 of the NPPF guides that decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.

Objectors have raised concerns regarding noise. It should be noted that the proposed development is to be contained to the existing site boundary.

The site is partially surrounded by residential development, given its urban location. It is considered that the properties most affected by the proposals will be dwellings on Saltern Road to the North. In regard to the static caravan development in replacement of the existing dwelling and wooden lodge, its relationship to the adjacent properties on Saltern Road is considered acceptable. This is due to the scale of the proposed new static caravans, how they sit when considering the local land levels, the existing boundary treatments and the distance involved between the buildings and structures. There is unlikely to be any potential for overlooking, loss of privacy, or loss of light/outlook. It is accepted that the placement of static caravans may increase the level of activity within the area, however the basic land use remains part of a tourism site and the impact is unlikely to be demonstrable. In respect of the impact of the dwellings off Saltern Road, the plot arrangement produced does not introduce any scale of building, or distance between buildings that may result in harm to existing occupants through loss of privacy, light or outlook.

In terms of the other proposed development, the development is within the middle of the holiday park. Given its siting, scale and design, it is considered that the proposal would not result in any unacceptable impact on the amenities of neighbouring occupiers in terms of their privacy, outlook, or access to natural light, and would not result in any unacceptable impacts in terms of noise or odour.

Overall, the proposal is considered to be in accordance with Policy DE3 of the Local Plan, Policy PNP1(c) of the Paignton Neighbourhood Plan and the guidance contained within the NPPF.

4. Impact on Highway Safety

Paragraph 110 of the NPPF guides that when assessing developments it should be ensured that (a) appropriate opportunities to promote sustainable transport modes can be - or have been - taken up, given the type of development and its location; (b) safe and suitable access to the site can be achieved for all users; (c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and (d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. Paragraph 111 of the NPPF confirms that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Policy DE3 of the Local Plan specifies that new development proposals should have satisfactory provision for off-road motor vehicle parking, bicycles and storage of

containers for waste and recycling. Policy TA1 of the Local Plan sets out promoting improvements to road safety. Policy TA2 of the Local Plan states all development proposals should make appropriate provision for works and/or contributions to ensure an adequate level of accessibility and safety, and to satisfy the transport needs of the development. Policy TA3 of the Local Plan details that the Council will require appropriate provision of car, commercial vehicle and cycle parking spaces in all new development. Policy BH8 of the Brixham Peninsula Neighbourhood Plan states that all new development should comply with the relevant adopted standards.

Objectors have raised concerns regarding traffic and access. Appendix F of the Local Plan states that 1 parking space should be provided per unit. The agent has addressed the concerns stating that the Site Licence requires adequate parking to be provided within the park for caravan occupiers and visitors alike. This is a mandatory requirement. Parking is not always capable of being provided 'on-pitch' due to landfall or layout constraints and communal car parks are not uncommon. That is the case at Waterside. Modern park development/redevelopment does nevertheless endeavour to provide on-pitch parking these days where achievable. The vehicular access within the site will largely remain unaltered, other than minor reconfiguration of the existing car park.

and accord with Policies TA1, TA2 and TA3 of the Local Plan, Policy BH8 of the Brixham Peninsula Neighbourhood Plan and the guidance contained within the NPPF.

5. Impact on Ecology and Trees

Policy NC1 of the Local Plan states that all development should positively incorporate and promote biodiversity features, proportionate to their scale. Policy SS8, particularly criterion 1, of the Local Plans states sites, species and habitats protected under European, or equivalent legislation will be protected from development. Development around the edge of the built up area will be required to protect and manage wildlife and habitats, including corridors between them, in accordance with Policy NC1 of the Local Plan and particular attention must be paid to Greater Horseshoe Bat flightpaths. Policy E8 of the Brixham Peninsula Neighbourhood Plan states that internationally important sites and species will be protected. Development affecting internationally protected site and species will only be approved where it can be demonstrated there is no likely significant effect, either alone or in combination with other plans or projects and regard has been given to the NPPF and conforms with Policy NC1 of the Local Plan.

The application has been supported by two ecological reports which have been reviewed by Devon County Council's Ecologist on behalf of the Local Planning Authority.

The application site lies within the sustenance zone for the South Hams Special Area of Conservation (SAC) with respect to Greater Horseshoe Bats. The proposed

development will not lead to the loss, damage, or disturbance to potential greater horseshoe bat commuting routes and foraging habitats. Nor will it lead to the loss damage or disturbance to a pinch point or an existing mitigation feature. This is due to the localised nature of the development in an urban, developed area, and the lack of suitable GHB habitat on site and in the surrounding area. In line with the South Hams SAC Habitats Regulations Assessment Guidance document (DCC et al.,2019), and given the above, this project will not have a likely significant effect on the South Hams SAC population of Greater Horseshoe Bats either alone or in-combination.

The development falls within the SAC Recreation Zone for Berry Head Country Park, where the potential for recreational pressure due to new developments may affect the wildlife interests of the Berry Head component of the South Hams SAC. Qualifying features include calcareous grassland and sea cliffs (with their associated species). For non-CIL liable developments such as this, applications for additional tourist accommodation or additional dwellings within the Brixham Peninsula Neighbourhood Plan Area are required to pay a Section 106 contribution of £131 per holiday unit and £95 per new dwelling in order to offset the resultant additional recreational pressure on the calcareous grassland at the Berry Head to Sharkham Point Component of the South Hams Special Area of Conservation.

The site is approximately 300m west of Lyme Bay and Torbay SAC. The development would result in an additional 9 holiday units within 300m of Lyme Bay and Torbay SAC interest features. Qualifying features are reefs, sea caves and great white sharks. The potential threat of increased public access and disturbance to the sea caves has been raised in the SAC Site Improvement Plan (SIP). The SIP states however, that this issue is being addressed through the promotion of Codes of Conduct and a coastering licencing scheme led by the Torbay Coast and Countryside Trust. It is therefore considered that this proposal will not result in a Likely Significant Effect on the SAC either alone or in-combination with other Plans and Projects.

There is potential for an increase in waterborne pollutants to be produced and enter controlled water during the construction phase of development. In addition, new holiday development could increase the demand on foul water systems. Therefore, a Construction and Environmental Management Plan (CEMP) is recommended to be included as a planning condition.

The site is approximately 300m west of Torbay Marine Conservation Zone (MCZ). Qualifying features of 11 habitats and 3 species, including seagrass beds, intertidal mud, native oyster, long-snouted seahorse, and peacock's tail. In view of the nature of the application for the clubhouse, holiday apartments, holiday caravans, and facilities, one impact pathway has been identified that have the potential to affect the interest features of the MCZ:

- Effects on water quality - Dust, sediment and pollutants reaching the MCZ through either discharge into local water courses, leaching through contamination of ground

water, and/or transmission of dust through the air; and increased demand on drainage capacity and the foul sewer infrastructure.

Therefore, planning conditions are recommended to mitigate any potentially harmful impact on the Torbay MCZ.

In terms of the proposed development and European Protected Species, a number of planning conditions are recommended to protect bats and nesting birds, such as no external lighting without the permission of the Local Planning Authority, the development to be carried out in strict accordance with the measures outlined in the accompanying ecology reports, and pre-works check for nesting birds if demolition to occur between March and August.

Subject to the aforementioned planning conditions, the proposal is considered to accord with Policy NC1 of the Local Plan and Policy E8 of the Brixham Peninsula Neighbourhood Plan.

Policy C4 of the Local Plan states that development will not be permitted where it would seriously harm, either directly or indirectly, protected trees or veteran trees, hedgerows, ancient woodlands or other natural features of significant landscape, historic or nature conservation value. Policy C4 goes on to state that development proposals should seek to retain and protect existing hedgerows, trees and natural landscape features wherever possible, particularly where they serve an important biodiversity role.

The proposed development would not result in the loss of any trees. The Council's Tree and Landscape Officer has been consulted on the proposal and raises no arboricultural issues, however recommends a planning condition is employed to secure a suitable landscaping plan. Subject to the aforementioned planning condition, the proposal is considered to comply with Policy C4 of the Local Plan.

It is considered that impacts on matters of biodiversity and trees are acceptable and accord with Policies NC1 and C4 of the Local Plan and Policy E8 of the Brixham Peninsula Neighbourhood Plan, subject to appropriate mitigation.

6. Flood Risk and Drainage

Policy ER1 of the Local Plan states that proposals should maintain or enhance the prevailing water flow regime on-site, including an allowance for climate change, and ensure the risk of flooding is not increased elsewhere. Given that part of the application site is within the Paignton Neighbourhood Plan boundary, Policy PNP1(i) of the Paignton Neighbourhood Plan is also relevant and states that developments will be required to comply with all relevant drainage and flood risk policy.

The site is located within the Critical Drainage Area and a Surface Water Area. A holding objection has been raised by the Council's drainage engineer requesting additional information. An update on this will be provided to Members at Planning Committee but nevertheless it is recommended that the outstanding flood risk matters should be delegated to officers. A planning condition is recommended to secure a sustainable surface water drainage, subject to this the proposal is considered to be in accordance with Policy ER1 of the Local Plan.

7. Designing Out Crime

Policy SS11 of the Local Plan seeks that development proposals should help to reduce and prevent crime and the fear of crime whilst designing out opportunities for crime, antisocial behaviour, disorder and community conflict.

The Police Designing-Out Crime Officer has been consulted and recommends designing out crime measures to prevent opportunities for crime and anti-social behaviour. Officers recommend the use of a planning condition to secure the scheme of crime prevention measures. Subject to the recommended planning condition, the proposal is considered to be in accordance with Policy SS11 of the Local Plan.

Sustainability

Policy SS3 of the Local Plan establishes the presumption in favour of sustainable development. The NPPF definition of sustainability has three aspects which are economic, social and environmental. Each of which shall be discussed in turn:

The Economic Role

Tourism is recognised as an important driver of economic growth and there would also be some economic benefits to the construction industry from the proposed development.

When the lodges are occupied there would be an increase in the level of disposable income from the occupants some which would be likely to be spent in the local area and an increase in the demand for local goods and services.

There are no adverse economic impacts that would arise from this development

In respect of the economic element of sustainable development the balance is considered to be in favour of the development

The Social Role

The principle social benefit of the proposed development would be the provision of additional and improved tourist facilities.

Impacts on neighbour amenity have been discussed above where it is concluded that it would be possible to develop this site as proposed without significant harm to residential amenity.

On balance, the social impacts of the development weigh in favour of the development

The Environmental role

With respect to the environmental role of sustainable development, the elements that are considered to be especially relevant to the proposed development are impacts on the landscape, ecology and bio-diversity, and surface and foul water drainage. These matters are considered in detail above.

The environmental benefits identified are either marginal in the case of any biodiversity net gain or essentially mitigation as in the case of any landscape/ecological measures to be applied to the development.

The proposed development is in a sustainable location inasmuch as it is within the existing urban area and is located in close proximity to local amenities and good public transportation links.

It is concluded that the environmental impacts of the development weigh neutrally within the planning balance.

Sustainability Conclusion

Having regard to the above assessment the proposed development is considered to represent sustainable development.

Statement on Human Rights and Equalities Issues

Human Rights Act - The development has been assessed against the provisions of the Human Rights Act, and in particular Article 1 of the First Protocol and Article 8 of the Act itself. This Act gives further effect to the rights included in the European Convention on Human Rights. In arriving at this recommendation, due regard has been given to the applicant's reasonable development rights and expectations which have been balanced and weighed against the wider community interests, as expressed through third party interests / the Development Plan and Central Government Guidance.

Equalities Act - In arriving at this recommendation, due regard has been given to the provisions of the Equalities Act 2010, particularly the Public Sector Equality Duty and Section 149. The Equality Act 2010 requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good

relations between different people when carrying out their activities. Protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race/ethnicity, religion or belief (or lack of), sex and sexual orientation.

Local Finance Considerations

S106:

Due to the nature of the proposal and its location, a unilateral undertaking has been completed to secure the planning contributions required for the recreational impacts on the Berry Head calcareous grassland. A sum of £1,369 (9 x £131 and 2 x £95) is required, as per the Planning Contributions and Affordable Housing SPD.

CIL:

The land is situated in Charging Zone 2 in the Council's CIL Charging Schedule. The CIL liability for this scheme is Nil.

EIA/HRA

EIA:

Due to the scale, nature and location this development will not have significant effects on the environment and therefore is not considered to be EIA development.

HRA:

The application site is within a sustenance zone associated with the South Hams SAC, 300 metres west of the Lyme Bay and Torbay SAC and Torbay MCZ. The proposed development is unlikely to have a significant effect on the South Hams SAC or the functionally-linked supporting habitat associated with this either alone or in combination with any other plans or projects, no adverse effect on the integrity of the Lyme Bay and Torbay SAC, no adverse effect on the integrity of the MCZ, subject to mitigation measures secured by condition and/or obligation and being implemented in full.

Planning Balance

The planning assessment considers the policy and material considerations in detail. It is considered that the scheme in terms of addressing the Development Plan aspiration to enable Torbay's tourism offer to be developed in a sustainable and competitive manner, to enhance its role as a premier tourism destination. Tourist facilities and accommodation will be improved and modernised, and new tourism facilities provided, in order to attract new visitors, particularly overnight visitors, and increase overall spend.

Conclusions and Reasons for Decision

The proposal is considered acceptable in principle; would not result in unacceptable harm to the character of the area or local amenity; would provide an adequate standard of tourist accommodation and provide acceptable arrangements in relation to access and ecology. The proposed development is considered to represent sustainable development and is acceptable, having regard to the Torbay Local Plan, the Brixham

Peninsula Neighbourhood Plan, the Paignton Neighbourhood Plan, the NPPF and all other material considerations.

Officer Recommendation

Conditional approval subject to the resolution of a flood risk to the satisfaction of Officers; completion of a unilateral undertaking for the holiday units towards mitigating in-combination recreational impacts on the SAC; and the conditions detailed below. Final drafting of conditions, and addressing any further material considerations that may come to light following Planning Committee, to be delegated to the Assistant Director responsible for Planning, Housing and Climate Emergency.

Conditions

Bats and Breeding Birds

No removal of hedgerows, trees or shrubs or demolition shall take place between 1st March and 30 September inclusive in any given year, unless prior to the commencement of works a detailed biodiversity survey by a competent ecologist has been submitted to and approved in writing by the Local Planning Authority. The survey shall include the details of the check of vegetation for active birds' nests immediately before the vegetation is cleared and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting birds on the site. The development shall then be carried out in accordance with the details submitted and in accordance with the actions set out in the Bat Survey Assessment reports.

Reason: In the interests of protected species and in accordance with Policy NC1 of the Adopted Torbay Local Plan 2012-2030.

Construction Management Plan

No development shall take place until a site-specific Construction Management Plan has been submitted to and been approved in writing by the Council. The plan must demonstrate the adoption and use of the best practicable means to reduce the effects of noise and dust and to ensure environmental protection. The plan should include, but not be limited to:

- Procedures for maintaining good neighbour relations including complaint management.
- All works and ancillary operations which are audible at the site boundary, or at such other place as may be agreed with the Local Planning Authority, shall be carried out only between the following hours:
 - 08:00 Hours and 18:00 Hours on Mondays to Fridays and 08:00 and 13:00 Hours on Saturdays and; at no time on Sundays and Bank Holidays.

- Deliveries to and removal of plant, equipment, machinery and waste from the site must only take place within the permitted hours detailed above.
- Mitigation measures as defined in BS 5528: Parts 1 and 2: 2009 Noise and Vibration Control on Construction and Open Sites shall be used to minimise noise disturbance from construction works.
- Control measures for dust and other air-borne pollutants.
- Wheel washing facilities

Development shall take place in accordance with the approved plan and details which shall be implemented in full.

Reason: In the interests of the amenities of surrounding occupiers during the construction of the development, In accordance with Policy DE3 of the Torbay Local Plan 2012-2030. This pre-commencement condition is required to protect local amenity and highway safety prior to potentially impacting working commencing.

Construction Environmental Management Plan

No development shall take place (including ground works, vegetation clearance, demolition) until a Construction Environmental Management Plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall be prepared in accordance with specifications in BS42020; clause 10.2 and shall include the following.

- a) Risk assessment of potentially damaging construction activities.
- b) Identification of 'biodiversity protection zones'.
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
- d) The location and timing of sensitive works to avoid harm to biodiversity features. This includes the use of protective fences, exclusion barriers and warning signs.
- e) The times during construction when specialist ecologists need to be present on site to monitor works to ensure compliance with the CEMP: Biodiversity, and the actions that will be undertaken.
- f) Responsible persons and lines of communication.
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person
- h) Details of pollution control measures to include controls on reducing contaminated run-off, preventing discharge into local water courses and leaching through contamination of ground water.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details unless otherwise agreed in writing by the local planning authority.

Reason: In the interests of protected species and residential amenity and in accordance with Policies NC1 and DE3 of the Torbay Local Plan 2012-2030 and Policy E8 of the Brixham Peninsula Neighbourhood Plan. These details are required prior to commencement of development to secure suitable parameters for the construction phase.

Landscaping

Prior to the first use of the development hereby approved, a landscaping plan, including both hard and soft landscaping, shall be submitted to, and approved in writing by, the Local planning authority. All planting, seeding or turfing comprised within the approved scheme shall be carried out in the first planting season following the completion of the development to which they relate and any trees or plants which within a period of 5 years from completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next available planting season with others of a similar size and the same species. The approved hard landscaping details shall be provided within four weeks of the development to which it relates being brought into use and shall be retained for the life of the development. The landscaping plan shall include any further vegetation clearance, and shall define the type and areas of existing vegetation which will be retained and the type of re-planting / sowing that will be established, with the inclusion of plant species favoured by curlew and including the future management of said plant species. Once provided, the agreed landscaping shall be maintained for the life of the development.

Reason: In the interests of visual amenity and in accordance with Policies C4 and DE1 of the Torbay Local Plan 2012-2030.

Details – Static Caravans

Prior to the placement of static caravans on the site external details of the static caravans, including design, colour, type and texture, shall be submitted to and approved in writing by the Local Planning Authority. The development shall then be completed in accordance with the agreed details and the approved details shall not be altered or changed without the prior approval of the Local Planning Authority.

Reason: In the interests of visual amenity and in accordance with Policy DE1 of the Torbay Local Plan 2012-2030 and Policy BH5 of the Brixham Peninsula Neighbourhood Plan 2012-2030.

Occupancy Restriction

The static caravans and holiday apartment units hereby approved shall be for holiday use only and not for permanent residential occupation and shall not be occupied as a person's sole or main residence. Following the first occupation of the first unit the on-site manager of the facility shall at all times maintain a register of the names of all the owners/occupiers of the lodges and of their home addresses and shall make this information available at all reasonable times to the Local Planning Authority.

Reason: In the interests of tourism, the local economy, residential amenity and highway safety in accordance with Policies TO1, DE3 and TA3 of the Torbay Local Plan 2012-2030 and Policy TO1 of the Brixham Peninsula Neighbourhood Plan 2012-2030.

Staff Accommodation Restriction

The self-contained staff accommodation units hereby approved shall be for staff accommodation use only by persons whose main employment is at the application site.

Reason: In the interests of tourism, the local economy, residential amenity and highway safety in accordance with Policies TO1, DE3 and TA3 of the Torbay Local Plan 2012-2030 and Policy TO1 of the Brixham Peninsula Neighbourhood Plan 2012-2030.

External Lighting

Prior to the installation of any external lighting within the site, full details including their design, siting and levels/type of illumination shall be submitted to and approved in writing by the Local Planning Authority. The external lighting shall thereafter be installed and retained in full accordance with the approved details.

Reason: To safeguard legally protected species, including safeguarding foraging paths for legally protected bats, and in the interests of biodiversity in accordance with Policy NC1 of the Torbay Local Plan 2012-2030.

Ecology Report

The development hereby approved shall be carried out in accordance with the mitigation measures, recommendations and biodiversity net gain measures set out in the approved ecology report (plan reference 'CE-21002' received 12th July 2021 and 'CE-21002.1 (additional buildings)' received 3rd September 2021).

Reason: In the interests of protected species and in accordance with Policy NC1 of the Adopted Torbay Local Plan 2012-2030.

On-going Pollution Control Post-Development

Within 6 months of the commencement of development, details of ongoing pollution control measures post-construction will be submitted, including mitigation against waterborne pollutants entering the Special Area of Conservation and mitigation for the increased demand on foul water systems, shall be submitted to and approved in writing by the Local Planning Authority. The approved ongoing pollution control measures shall be managed and maintained for the lifetime of the development.

Reason: In the interests of protected species and in accordance with Policy NC1 of the Torbay Local Plan 2012-2030 and Policy E8 of the Brixham Peninsula Neighbourhood Plan.

Surface Water Drainage [subject to resolution]

A surface water flood risk assessment and surface water drainage plan shall be submitted and approved by the local planning authority prior to the commencement of development which demonstrates that the development will be safe from all sources of flooding without increasing flood risk elsewhere and where possible will reduce flood risk overall and which will provide for sustainable surface water drainage and discharge which meets with the Run-off Destination Hierarchy.

The recommendations of the approved flood risk assessment and the approved surface water drainage plans shall be implemented in full prior to occupation of the development (or otherwise in accordance with the terms of the approved assessment and plans) and shall be retained for the lifetime of the development.

Reason: In the interests of adapting to climate change and managing flood risk, and in order to accord with Policies ER1 and ER2 of the Adopted Torbay Local Plan 2012-2030 and the guidance contained in the NPPF.

Foul Water Drainage

A foul water drainage plan shall be submitted and approved by the local planning authority prior to the commencement of development to include mitigation for the increased demand on foul water systems and impact on the foul sewer infrastructure post-construction.

The recommendations of the approved foul water drainage plans shall be implemented in full prior to occupation of the development (or otherwise in accordance with the terms of the approved assessment and plans) and shall be retained for the lifetime of the development.

Reason: In the interests of amenity and in adapting to climate change and managing flood risk, and in order to accord with Policies DE3, ER1 and ER2 of the Adopted Torbay Local Plan 2012-2030 and the guidance contained in the NPPF.

Designing Out Crime

Prior to the first use of the development hereby approved, a scheme of measures for designing-out crime shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be fully installed prior to the first use of the development and shall be permanently retained thereafter.

Reason: In the interests of amenity and preventing opportunities for criminal activity, in accordance with Policies DE1, DE3 and SS11 of the Adopted Torbay Local Plan 2012-2030.

Informative(s)

01. Responsibilities of the applicant / developer:

All bats are protected by law. If bats are found, works must immediately cease and further advice be obtained from Natural England and / or a licensed bat consultant. Works must not resume until their advice has been followed. Nesting birds are also protected by law. During site clearance and construction works, suitable safeguards must be put in place to prevent threat of harm to legally protected species, including nesting birds and reptiles all of which are protected under the Wildlife & Countryside Act 1981 (as amended). Where works are to involve cutting or clearance of shrubs, hedges or other vegetation, which can form nesting sites for birds, such operations should be carried out at a time other than in the bird breeding season (which lasts between 1 March - 15 September inclusive in any year). Schemes must be in place to avoid threat of killing or injuring reptiles, such as slow worms. Slow worms may shelter beneath vegetation as well as among any stored or discarded sheeting, building and other materials. Further details can be obtained from a suitably qualified and experienced ecological consultant, or please refer to published Natural England guidelines for protected species.

02. In accordance with the requirements of Article 35(2) of the Town and Country Planning (Development Management Procedure) (England) Order, 2015, in determining this application, Torbay Council has worked positively with the applicant to ensure that all relevant planning concerns have been appropriately resolved. The Council has concluded that this application is acceptable for planning approval.

Relevant Policies

C4 – Trees, Hedgerows and Natural Landscape Features

C5 – Urban Landscape Protection Areas

DE1 – Design

DE3 – Development Amenity

ER1 – Flood Risk

ER2 – Water Management

NC1 – Biodiversity and Geodiversity

SS3 – Presumption in favour of Sustainable Development

TA1 – Transport and Accessibility

TA2 – Development Access

TA3 – Parking Requirements

BH5 – Good Design and the Town and Village Design Statements

E2 – Settlement Boundaries

E8 – Internationally and Nationally Important Ecological Sites

PNP1(c) – Design Principles

PNP1(i) – Surface Water