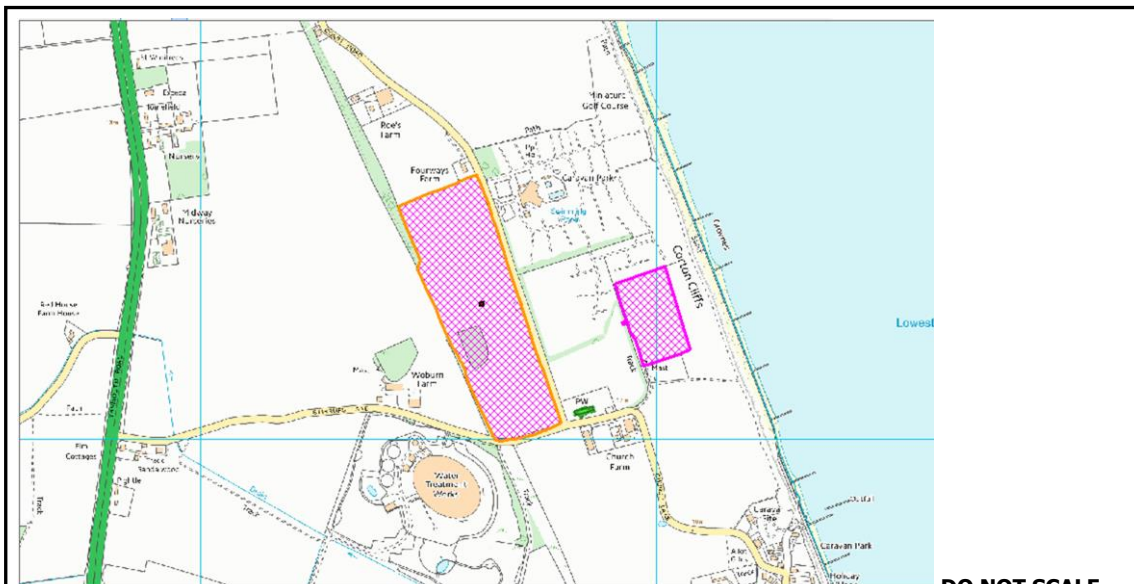


PLANNING COMMITTEE – 11 DECEMBER 2018**APPLICATION NO DC/18/0813/COU****LOCATION**

Broadland Sands Holiday Park
Coast Road
Corton
Lowestoft
NR32 5LG

EXPIRY DATE 24 May 2018 (extension granted to 30 November 2018)**APPLICATION TYPE** Change of Use**APPLICANT** Park Holidays UK Ltd**PARISH** Corton**PROPOSAL** Change of use of land for the stationing of static holiday caravans, construction of footway/cycleway, church parking area and associated works**DO NOT SCALE**

SLA100042052

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1. SUMMARY

- 1.1 The submitted application covers two sites and seeks approval for a change of use of agricultural land to the west of the Coast and to the east of St Bartholomew's church for the stationing of static caravans and lodges and as an extension to the existing facility of Broadland Sands, Corton. The extension is considered necessary to futureproof the business due to coastal erosion and roll-back.
- 1.2 The application is presented to members due to the scale of the development, and for economic, tourism, business and conservation issues regarding the proximity of the Grade II* listed church and its wider setting.

2. SITE DESCRIPTION

- 2.1 Broadland Sands is a well-established holiday centre to the northernmost limits of Waveney and Lowestoft and is very close to the border with Norfolk and the village of Hopton which is also a popular and well established popular holiday area with associated centres and facilities at both local and national level.
- 2.2 The existing Broadlands holiday site is located to the eastern side of Coast Road between the cliffs and the road. St Bartholomew's church is to the south western corner with the remainder of the area being predominantly agricultural with some smaller tourist sites accommodating mobile caravans and tents and the former railway line running north to south along the western edge of the application site itself. The existing holiday centre can be accessed via the A47 either from Hopton, along Stirrups Lane or via Corton village.
- 2.3 The expansion of the holiday park is made possible by purchase of the immediately adjacent farmland, both to the south east of the existing holiday park being approximately 1.6 hectares of land and to the west side of Coast Road on approximately 10 hectares of land. Broadland Sands Holiday Park is an existing destination to the north of Corton, currently covering a site of approximately 13.5 hectares. Within that area there is a mature and extensive development of static caravans together with associated bar restaurant, swimming pool, play and sports areas, pitch and putt golf course and ancillary facilities.
- 2.4 The existing site has had planning permission for a previous extension containing larger lodges on the site (Ref: DC/14/3876/FUL) which is currently under construction and is proving very popular with owners and visitors alike. The application proposal would offer a mix of standard static caravans and the more luxurious style lodges, along with open space, planting and improved cycle and footpaths along with additional parking for the church. A further application was approved in October for the erection of a new swimming pool complex (D2/A5), children's playground, crazy golf course, climbing wall, archery/activity space, decking link to the existing clubhouse and associated facilities (Ref: DC/18/3277/FUL).

3. PROPOSAL

- 3.1 Application for the change of use of land for the stationing of static holiday caravans, construction of footway/cycleway, church parking area and associated works at Broadland Sands holiday Park, Coast Road, Corton.

4. CONSULTATIONS/COMMENTS

4.1 Parish Council Comments

Corton Parish Council object strongly to this planning application and are concerned on the impact to the village.

When Broadland Sands held an open meeting they did not inform the parish council and it was by chance that the parish council found out about it and some parish councillors attended. Concerns were raised but nothing was heard after this meeting took place.

These are the observations of Corton Parish Council

- Could be an extra 400 vehicles
- People crossing road which has no pavement and unlit and used by double decker bus and cars to access entertainment at the complex, which is an accident waiting to happen.
- People crossing from church parking to church on the corner.
- Building disruption and additional HGV's through the village to the site.
- Could affect bus service when these works take place.
- Water source and waste water.

4.2 Hopton Parish Council

HPC objects to the proposed development in its current form for the following reasons:

- SCC Highways objected to the original access route along Stirrups Lane on the grounds of safety at the junction with the A47. A new route has been proposed through Hopton-on-Sea incorporating a single track lane with passing places leading to a roundabout on the A47 which is already at capacity during the holiday season. Neither NCC nor HPC were consulted about the proposal.
- There appears to be no acknowledgement that Hopton-on-Sea is also a holiday village and the resident population is approximately doubled for the holiday season.
- No traffic survey has been prepared for the proposed route through Hopton.
- The Hopton Speed Awareness Monitor data indicates that during the summer months a vehicle moves eastwards along Hopton Station Road every 11 seconds. A majority of this traffic originates from the A47 roundabout.
- HPC would suggest directing traffic to the proposed site from the A47 along Corton Long Lane, Corton Station Road and The Street/ Church Lane. It is less tortuous and less busy than the proposed route via Hopton and shall not over-burden the already at capacity infrastructure.
- The traffic survey that has been produced for Corton correctly identifies peak traffic around the site as Easter and school summer holidays. The recommendation is that a survey be carried out during August. Why is it that the traffic count produced was undertaken between 9th and 15th January 2017? This is undoubtedly the quietest period for both Corton and Hopton. The estimated 600 vehicles per day is woefully inaccurate.
- The traffic survey also assumes peak traffic between the hours of 08:00 to 09:00 and 17:00 to 18:00 with a movement every 40 seconds at peak times. Holiday villages such as Corton and Hopton do not have a conventional "rush hour" in the same manner as

a dormitory community. HPC analysis of the traffic flows around Hopton village indicates that traffic peaks around 10:00 and maintains a fairly consistent level until 19:00. This is understandable with holidaymakers travelling to and from the local attractions during the daytime.

- It is noted that NCC Highways did initially object to the proposed access route but subsequent to meeting with the developer shall remove their objection providing that Longfullans Lane is upgraded. The HPC view is that until a proper, representative traffic survey of the entire route is completed and acted upon then their objection shall remain.
- The application is for a 65% increase in accommodation units predominantly built on land identified as providing the Strategic Gap between Corton and Hopton. This appears to contravene Policy DM28 particularly should the housing development being considered for South of Longfullans Lane and HO05, a development immediately North of Longfullans Lane that already has Outline Planning Permission, proceed.
- The proposed Western site is to have no entertainment facilities meaning that people shall be crossing the main road during the day and night. There is no clear indication given in the plan to mitigate the increased pedestrian crossings of an unlit, national speed limit road at any time of day or night.
- The Eastern site is 37.4m from the clifftop with a life expectancy of 20+ years. However, this could be less than 5 years if the storms of 2013 (8m loss in a single year) are regularly repeated. What is the contingency plan for the Eastern development if the 20 year lifespan is inaccurate? There are already pitches close enough to the clifftop that shall be lucky to survive a single 2013 storm. The suspicion is that the Western site has been reduced in density deliberately to accommodate the units that must be relocated in the near future due to cliff erosion destroying the open plan look of the site as currently portrayed.

4.3 **Neighbour consultation/representations:** Seven letters of objection received raising the following matters:

- Access
- Design
- Dominating/Overbearing
- Drainage
- Harm to Listed building
- Landscape impact
- Loss of open space
- Loss of view
- Principle of Use
- Scale
- Setting of precedent
- Traffic or Highways
- Wildlife

4.4 **Suffolk County - Highways Department** Further to receiving additional plans, notice is hereby given that the County Council as Highway Authority recommends that any permission which that Planning Authority may give should include the conditions shown below (these are the same conditions recommended in previous response dated 26th

July, ref: 570\CON\0799\18 except for an amendment to the drawing reference in condition 3 - HW2).

- 4.5 **Suffolk County - Rights Of Way** the footpath that is depicted along the cliff top (FP2) has largely been lost to coastal erosion, but there is an expectation that public access along the cliff top will be accommodated. There is scope for a significant improvement in this area and no objections subject to conditions.
- 4.6 **Natural England** Natural England has no comments to make on this application.
- 4.7 **WDC - Drainage And Coast Protection:** Requests for more work to ensure that it makes reference to the SPD and also to the recent coastal strategy study. However, advice is likely to remain that this is a sound assessment and that the development should not be blocked on erosion risk grounds.
- 4.8 **Environment Agency - Drainage** No objection to the proposal. This application does not require a Flood Risk Activity Permit as it does not trigger a flood risk activity as outlined under the terms of The Environmental Permitting (England and Wales) Regulations 2016, Schedule 25, Part 1.
- 4.9 **Suffolk Wildlife Trust** The dismantled railway line along the western boundary of the site must be retained, protected and enhanced in order to maximise its value for wildlife. We recommend that a Landscape and Ecology Management Plan (LEMP) for the site is secured as a condition of consent, should permission be granted.
- 4.10 **WDC Environmental Health - Contaminated Land and Noise** No objections or adverse comments in terms of noise or contaminated land.
- 4.11 **Suffolk County Archaeological Unit** No objection subject to the imposition of conditions.
- 4.12 **Great Yarmouth Borough Council** No response received.
- 4.13 **Highways England** No objections to the development.
- 4.14 **SCC Flooding Authority** Suffolk County Council, Flood and Water Management have reviewed application ref DC/18/0813/COU. Following review of the submitted documents, approval is recommended subject to conditions.
- 4.15 **Historic England** – Historic England objects to the application on heritage grounds as it would result in harm to the setting of the Grade II* listed church. Response comments have been précised below:
- The major expansion of the holiday park is proposed on land to the west on the opposite side of the Coast Road. This field does make an important contribution to the setting and significance of the church. It provides an open area of attractive rural landscape which helps to convey the context in which the church has existed for much of its history and provides a pleasant setting for the building. It is proposed to retain an area of open land at the southern end for use by the church with a planted screen between this and the lodges. The planting, assuming it is appropriately designed and maintained, should screen the lodges in views from the church and the south.

However the planted boundary itself would curtail the rural views and the presence of the large development to the north would change the rural setting of the building.

- We have considered how the harm might be reduced. Any development within the field would result in some harm. However, limiting development to the northern half of the field, at the line of the proposed hedge or possibly in line with the area of retained woodland would notably reduce the level of harm. We would therefore advise that the scheme is amended in this way.

4.16 **Suffolk Preservation Society** significant harm will result to the setting of the Grade II* listed St Bartholomew's Church and strongly recommend refusal.

4.17 **Norfolk County Council – Highways Department** Further to correspondence letter dated 29 March 2018 which outlined NCC's holding objection to the above application, you will be aware that mitigation options have been discussed and NCC Highways can confirm that appropriate measures have now been agreed in principle.

Accordingly, it is confirmed that, Norfolk County Council as a local Highway Authority, hereby withdraws its objection to the proposed development subject to the following conditions and informative notes being appended to any grant of permission your Authority is minded to make.

4.18 **Head of Economic Development** Economic Development seeks to support applications that clearly support and further the economic growth and regeneration of the local economy. Tourism is a significant economic driver and one of our key sectors as listed in the East Suffolk Economic Growth Plan 2018-2023. Encouraging existing businesses to invest and grow is also one of the three main priorities in the plan and job creation is one of our key objectives.

We would be supportive of any new tourism accommodation proposals that would strengthen the visitor economy in Waveney and enhance the diversity of the current offer. Self-catering accommodation was worth £5,961,000 to the local economy in 2017 according to the Economic Impact of Tourism report. Tourism is a key driver of economic growth (East Suffolk Economic Growth Plan) and our primary aims, as described in the East Suffolk Tourism Strategy, are to increase the volume and value of tourism, to extend the tourist season, to create compelling destinations and to link visitors more to experiences. We would be pleased to see the creation of rural employment opportunities and the generation of income into the local economy as a result

PUBLICITY

The application has been the subject of the following press advertisement:

Category	Published	Expiry	Publication
Major Application, Adjacent to Listed Building, Public Right of Way Affected,	06.04.2018	26.04.2018	Beccles and Bungay Journal

Major Application, 06.04.2018 26.04.2018 Lowestoft Journal
Adjacent to Listed
Building, Public
Right of Way
Affected,

SITE NOTICES

The following site notices have been displayed:

General Site Notice Reason for site notice: Major Application, Adjacent to Listed building, In the Vicinity of Public Right of Way, Date posted 29.03.2018 Expiry date 18.04.2018

RELATED APPLICATIONS

Reference No	Proposal	Decision	Date
DC/91/0374/FUL	Change of use from agricultural to touring caravan and camping site	Refused	16.09.1991

There is a considerable history relating to this site dating back to the late 1960's (that WDC have on record) however the majority of these relate to the redevelopment and renovation of existing features such as the bar, the swimming pool and general layouts within the main park area.

5. PLANNING POLICY

- 5.1 Section 38(6) of the Planning and Compensation Act 1990.
- 5.2 The National Planning Policy Framework (2018) and National Planning Policy Guidance (NPPG) forms a material consideration in the determination of this application in particular those areas of guidance relating to the location of town centre uses.
- 5.3 Planning (Listed Buildings and Conservation Areas) Act 1990, Part II.
- 5.4 National Planning Policy Framework 2018.
- 5.5 Waveney Local Plan Adopted Core Strategy, January 2009CS01 Spatial Strategy
 - CS02 High Quality and Sustainable Design
 - CS07 Employment
 - CS13 Tourism
 - CS16 Natural Environment
 - CS17 Built and Historic Environment
- 5.6 Waveney Local Plan Adopted Development Management Policies, January 2011
 - DM02 Design Principles
 - DM06 Coastal Change Management Area
 - DM24 Touring Caravan, Camping and Permanent Holiday Sites

- DM25 Existing and Proposed Open Space
- DM27 Protection of Landscape Character
- DM28 Strategic Gaps and Open Breaks
- DM29 Protection of Biodiversity and Geodiversity
- DM30 Protecting and Enhancing the Historic Environment
- DM31 Archaeological Sites

6. PLANNING CONSIDERATIONS

Principle and Policy

- 6.1 The primary issue to be considered is that of principle of development. The site is located outside of any physical limits and is within the open countryside and is also immediately adjacent to the Grade II* listed St Bartholomew's Church and as such the setting of the listed building is a matter of concern, however, this also needs to be weighed against the employment, economic and tourism benefits that the extension would bring and assessed against the potential loss of existing space due to coastal erosion, which would also have an impact on existing employment, economic and tourism principles. As a result of all these issues the proposed development needs some considerable assessment and is very finely balanced.
- 6.2 With regards to policy, the proposal is related to a nearby tourist enterprise and is helping to serve the needs of a rural enterprise; therefore planning policy could allow for such a development. However, the development will need to ensure that it does not increase the risk of coastal erosion or risk to property and should include screening measures to integrate the development into the landscape. It seems as though, and officers are satisfied, this has been undertaken by the applicant. Furthermore consideration of rollback has also been included in the application which accords with para 5.20-5.22 of the Coastal Change SPD, which specifically relates to caravan sites. Notwithstanding this however assurance has been received that the caravans located in the 'Eastern Site' are movable in the case that rollback is required due to coastal erosion. As such officers are of the opinion that the proposed development is broadly acceptable in principle.
- 6.3 Notwithstanding the above however further consideration is required in relation to policy DM28 – Strategic Gaps and Open Breaks which states that "In order to prevent coalescence of settlements, development will not be permitted where it would prejudice the aims of maintaining the open character of the Strategic Gaps and Open Breaks". As this site is located in an open break between Corton and Hopton, it would be contravening this policy. However, if the measures shown on the submitted plans are fully implemented to integrate the holiday caravans and church parking area into the landscape; this could be looked upon favourably as the visual impact would be mitigated somewhat, however this does leave the issue of the setting of the listed building which will be further addressed below.

Setting of listed building, landscape and heritage impacts

- 6.4 Following the issue of principle there is a significant concern for the setting of the Grade II* listed church and officers, along with the agent and applicant have carried out numerous site visits and discussions with Historic England, and whilst they are satisfied with the less than substantial impact generated by the smaller extension due to existing topography

and planting there remain some concerns with the larger extension to the west of Coast Road.

- 6.5 The main area of concern is that of the larger extension to the west of the Coast Road and the broader landscape impact. It has been suggested that the hedge separating the open area to the south containing the new church car park be bolstered by additional planting however Historic England remain of the opinion that the site should be reduced in scale and in effect halved in size.
- 6.6 Whilst the applicants appreciate the views of Historic England they also consider that such a reduction would have a significant impact on their operation and would not be financially viable and as such there is a considerable conflict between maintaining the setting of the listed building and allowing a significant local company to accommodate loss of land due to coastal erosion and to roll-back their lodges and caravans onto the land, which will have an impact on the setting.
- 6.7 The Council's Senior Landscape & Arboricultural Manager has been consulted and considered the comprehensive Landscape Visual Impact Assessment (LVIA) and has submitted comprehensive comments which are given below for members information:
- 1) "The proposal is for a two part extension to the existing holiday park with the smaller area to the south east of, and partially enclosed on two sides by the existing park, and the much larger area proposed for existing farmland to the west of the park's existing western frontage. The smaller area falls within the landscape character type E 'Dunes, Coastal levels and Resorts', as defined by the Great Yarmouth and Waveney Landscape Character Assessment, and this is a diverse landscape influenced by settlement growth associated with recreational and residential pressures. The site itself is reasonably typical of the prevailing local landscape character, and it is well screened from the adjacent road and associates readily with the existing park".
 - 2) "The much larger area to the west falls within the landscape character type H1 'Blundeston Tributary Valley Farmland', as defined by the Great Yarmouth and Waveney Landscape Character Assessment, which notes that the settlement edges of Lowestoft, Corton and Great Yarmouth create an urbanising influence. It is also noted that views are contained by a small to medium scale landscape partially contained by wooded skylines. The site is relatively well contained by trees including those along the former Lowestoft to Great Yarmouth railway line that runs to the west of the site, together with a copse of trees within the site. The site is also largely fringed with hedgerows and trees which also exist in the wider surrounding landscape".
 - 3) "The consequence of this is that the site is relatively well visually contained with limited views to the sea, although church towers form historic markers in the landscape. Expansion of tourism related development has been a key force for change in recent decades. The landscape character assessment raises concerns over the potential for loss of open coastal edges to the landscape type through expansion of settlement edges. The use of native species planting to contain development edges is advised. It is against this background that this proposed extension to the holiday park should be assessed".

- 4) "The submitted landscape assessment advises that the change from open farmland/scrub to holiday park will result in a substantial change in landcover/use. The majority of the development is not expected to exceed 4m. height and will be seen against the backdrop of the existing resort where views exist in the surrounding landscape. Therefore it can be considered that there is a degree of contextual relevance. The assessment states that the significance of effects upon landscape character may be regarded as no more than slight adverse which I consider to be a conservative assessment but nonetheless a more realistic assessment still does not approach substantial significance, and this may be regarded as academic to a degree once mitigation measures are considered. Provided that the described mitigating planting is factored in, the significance of effects will reduce after 10-15 years to something nearer neutral, given also the prevailing character of the surrounding area".
- 5) "As far as visual impacts are concerned, I have found the assessment to be thorough and realistic in its conclusions. It does not shy away from the fact there will be for PROW users in the immediate local area and adjacent to the site, substantial to moderate impacts for PROW users during the construction phase. These will reduce on completion and as mitigation planting takes effect to moderate to slight adverse impacts. Inevitably the significance of effects will reduce with distance from the site, and overall it is assessed there will be no lasting significant adverse effects, and that includes for the nearest private resident receptors that have a view of the sites, and for users of the coast path".
- 6) "The applicant has also submitted an arboricultural survey and impact assessment which has shown no significant impacts on trees arising from the proposed development. Also submitted are new tree, hedge and shrub planting proposals with an accompanying landscape management plan. Where these specifically deal with the boundaries to the new sites, I have found them to be suitable both for the prevailing local landscape character, and for the anticipated mitigation and screening benefits. Additional amenity planting is also shown for internal areas within the sites, which although somewhat limited in its extent, is suited to the prevailing growing conditions".
- 7) "Overall I consider that there is no significant reason to refuse this proposal on the grounds of adverse landscape and visual impact".

6.8 Therefore officers are satisfied that the landscape impact of the development is less than substantial and as noted above, it would be difficult to substantiate a refusal on landscape impact grounds and any impact could be suitably mitigated by a comprehensive planting scheme.

6.9 Nonetheless and notwithstanding the above further consideration is required of the National Planning Policy Framework (2018) and Paragraph 189 states that "In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance." As a result of this a heritage assessment was submitted and the scheme has been designed to try to reduce the impact of the development on the heritage asset insofar as

possible, which includes a significant hedge planting scheme between the open space and newly designated church car park, however, it is indisputable that there will be some impact to the overall landscape setting.

- 6.10 Furthermore paragraph 190 states that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal and when considering the impact of a proposal on a heritage asset, it should seek to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal. As already stated the church has been identified as a designated heritage asset and that this has been taken into consideration within the scheme and therefore these requirements have been fulfilled.
- 6.11 Notwithstanding the above paragraphs 193 and 194 state that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance and that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Officers have considered the impact of the development along with comments received from Historic England and Suffolk Preservation Trust and discussions have been undertaken with Historic England, whereupon the general consensus was that the eastern extension, although having an enclosing effect, would be less than substantial given the lack of visibility of the church from this area. The former public coastal path has been lost to coastal erosion and the church is not visible from the beach and planting measures would not have a significant impact on the overall setting.
- 6.12 Finally and perhaps most pertinent to this application, paragraph 195 states that where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, and this is the most difficult issue to address as it could be debated that the proposed extension to the west is of public benefit. The caravans and lodges proposed would be in private ownership via the Park Resorts company and as such it could be suggested that this is not in the public interest, however the wider scheme also involves improved access routes for pedestrians and cyclists, car parking for the church, open space to the south of the site and landscaping along with local employment benefits, tourism offer and the local economy and this needs to be weighed against the harm to the setting of the listed building.
- 6.13 Both Historic England and the Council's Conservation Officer have reservations and concerns regarding the proposed extension to the west and although there are some impacts to the setting from the site to the east, this is of a lesser concern than the large western site as noted above in paragraph 6.10. Both Historic England and the Conservation Officer understand the need for roll-back but it remains that they do have objections to the proposed extension due to the impact on the setting of the Grade II* listed building and have commented that the harm caused by the proposal to extend to the west could be reduced by only developing the holiday park up to the existing wooded area. This alteration would certainly go some way to reducing the harm to the immediate setting. However, both historic England and the Conservation Officer feel that this development

remains to be a considerable/high level of harm, which has to be weighed against the Public benefit by the Council as the decision maker.

Coastal erosion

- 6.14 The site is located within the Coastal Erosion Vulnerability Area and as such long-term plans have indicated that there will be a loss of land that will impact upon the operation of the site and place its future at risk and in order to future proof it there needs to be an established roll-back programme in place. This issue has been discussed with the Coastal Management Team who broadly support the proposed park extension and have commented as follows:

“The CEVA submitted by the applicant dated Feb 2018 demonstrates a good standard of investigation of coastal change risk. Based on EA monitoring data post 2004 it concludes that the seaward flank of the development will be at risk from erosion by 2040. This is earlier than predicted by the SPD. The client’s investment decision is therefore based on a more pessimistic outcome than that given by the SMP as illustrated in the SPD”.

“However the CEVA does not reference the requirements of the SPD in terms of required format and coverage. A notable omission is a statement on decommissioning of the site at life expiry. The CEVA also, surprisingly, takes no account of the findings of the Gorleston to Lowestoft Coastal Strategy Study which has updated coastal management thinking over this section of coast”.

“To summarise I am satisfied that the CEVA has provided a robust assessment of erosion risk and wider impacts which has potential to meet the tests required by the SPD. I recommend that the applicant is required to update the CEVA report to ensure there are appropriate references to the SPD in general and in particular responses to questions in the CEVA Level B template”.

“I also recommend that the developer prepares an Erosion Monitoring / Response Plan that identifies triggers for timely caravan removal and decommissioning / removal of infrastructure that include for a margin of safety”.

- 6.15 Further details have been requested with reference to decommissioning of the site and the SPD and members will be updated once this is received, however the risk to coastal erosion is considered acceptable in this instance.

Economy and employment

- 6.16 Economic Development seeks to support applications that clearly support and further the economic growth and regeneration of the local economy. Tourism is a significant economic driver and one of our key sectors as listed in the East Suffolk Economic Growth Plan 2018-2023. Encouraging existing businesses to invest and grow is also one of the three main priorities in the plan and job creation is one of the Council’s key objectives.
- 6.17 The Council are, as a whole, supportive of any new tourism accommodation proposals that would strengthen the visitor economy in Waveney and enhance the diversity of the current offer. Self-catering accommodation was worth £5,961,000 to the local economy in 2017 according to the Economic Impact of Tourism report and tourism is a key driver of

economic growth (East Suffolk Economic Growth Plan) and one of the Council's primary aims, as described in the East Suffolk Tourism Strategy, with the aspiration to increase the volume and value of tourism, to extend the tourist season, to create compelling destinations and to link visitors more to experiences and the economic and regeneration team have stated that they would be pleased to see the creation of rural employment opportunities and the generation of income into the local economy as a result of this proposed development.

- 6.18 Tourism data gathered by the United Kingdom Tourism Survey (UKTS) indicates that the parks industry accounts for nearly 90 million tourist bed nights which represents approximately 22% of the UK total. This introduces a spend in excess of £3 billion per annum (approximately 14% of the UK total). The park - as developed with 535 holiday caravans - contributes in the order of £8.8 to £13.8m per annum into the local economy. The proposed development would add a further 347 pitches so, once developed, would add between £5.7m and £8.9m per annum, a significant overall benefit in local tourism revenue. Furthermore the current level of employment at the park is 20 full-time and 58 park time staff. This is likely to rise over time to meet the needs of the new development to some 26 full-time and 75 part time staff.

Highways

- 6.19 With regards to highways there will of course be some impacts due to the potential increase in traffic, however, whilst there have been a number of issues surrounding highways, and as this application is close to the border of Norfolk, it has necessitated consultation with both Suffolk and Norfolk County Highways. However, all identified highways issues have been addressed to the satisfaction of both authorities and a number of conditions have been requested.
- 6.20 Both Corton and Hopton Parish Councils have raised concerns with regards to highways however in the absence of continued objections, and both authorities confirming they are satisfied, then a refusal on highways grounds would be difficult to substantiate.

Ecology

- 6.21 Natural England have declined to comment on the application and directed officers to their stranding matrix for advice and given the interrogation of this, the fact that the land is heavily farmed and there will be some considerable planting taking place, the ecological benefits of the scheme would be increased rather than reduced. Whilst there may be some impacts on direct routes through the site there will be access to the former railway line maintained, the significant tree copse in the middle of the site will be maintained and there will be additional planting of native species hedges and this is sufficient, in your officers opinion, to mitigate any potential impacts that might otherwise have been felt.
- 6.22 Nevertheless, planting and ecological mitigation conditions have been suggested and will be attached should members be minded to approve this application.

7 CONCLUSION

- 7.1 Whilst this application is very finely balanced given the potential impact of the development relating to the issues with the wider setting of the listed building, this needs

to be considered against the potential investment in coastal improvements, coastal roll-back and the benefits that the park extension would bring to tourism, employment and the local economy and the cost implications on the district if this income were lost.

- 7.2 Given the above, members are asked to consider whether the potential economic impacts, employment opportunities and improved transport proposals along with landscaping enhancements are sufficient to outweigh the harms identified to the setting of the listed building.
- 7.3 However officers consider that the proposal broadly complies with local planning policy, and although there are conflicts with the NPPF in terms of harm and setting, that the economic and employment benefits would outweigh these harms, particularly given the level of landscaping and the creation of additional parking for the church which is currently under provided for and would encourage more visitors to the church.

8. RECOMMENDATION

- 8.1 Therefore, for the reasons outlined below officers recommend that the application is approved subject to the conditions noted below:

CONDITIONS:

1. The development hereby permitted shall be begun within a period of three years beginning with the date of this permission.

Reason: In accordance with Section 91 of the Town and Country Planning Act 1990 as amended.

2. The lodges and caravans shall be occupied for holiday purposes only and shall not be occupied as a person's sole or main place of residence. The owners/operators shall maintain an up-to-date register of the names of all owners-occupiers of individual lodges on the site, and of their main home addresses and shall make this information available at all reasonable times to the local planning authority.

Reason: the proposed units are suitable for holiday accommodation but not suitable for residential use.

3. No part of the development shall be commenced until details of the proposed accesses indicatively shown on Drawing No. SHF.201.033.T.D.007.B (including the position of any gates to be erected and visibility splays provided) have been submitted to and approved in writing by the Local Planning Authority. The approved accesses shall be laid out and constructed in their entirety prior to occupation. Thereafter the accesses shall be retained in its approved form.

Reason: To ensure that the accesses are designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway safety.

4. No part of the development shall be commenced until details of the proposed pedestrian crossing and associated highway improvements (including Bus Stop relocation and improvement) indicatively shown on Drawing No. SHF.201.033.T.D.007.B have been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be laid out and constructed in its entirety prior to occupation.

Reason: To ensure that the necessary improvements are designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway safety.

5. No part of the development shall be commenced until details of proposed links to local public footpaths (as partially and indicatively shown on Drawing No. SHF.201.033.T.D.007.B and SHF.201.052.L.D.001A) have been submitted to and approved in writing by the Local Planning Authority. The approved links shall be laid out and constructed in their entirety prior to occupation.

Reason: To ensure that the necessary improvements are designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway safety.

6. No part of the development shall be commenced until details of proposed road signs to deter the increased use of Stirrups Lane junction with the A47 have been submitted to and approved in writing by the Local Planning Authority. The approved signs shall be provided in their entirety prior to occupation.

Reason: To ensure that the necessary improvements are designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway safety.

7. Before the development is commenced details of the areas to be provided for storage of Refuse/Recycling bins shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.

Reason: To ensure that refuse recycling bins are not stored on the highway causing obstruction and dangers for other users.

8. Before the development is commenced details shall be submitted to and approved in writing by the Local Planning Authority showing the means to prevent the discharge of surface water from the development onto the highway. The approved scheme shall be carried out in its entirety before the access is first used and shall be retained thereafter in its approved form.

Reason: To prevent hazards caused by flowing water or ice on the highway.

9. All HGV traffic movements to and from the site over the duration of the construction period shall be subject to a Deliveries Management Plan which shall be submitted to the planning authority for approval a minimum of 28 days before any deliveries of materials commence. No HGV movements shall be permitted to and from the site other than in accordance with the routes defined in the Plan. The site operator shall maintain a register of complaints and

record of actions taken to deal with such complaints at the site office as specified in the Plan throughout the period of occupation of the site.

Reason: To reduce and / or remove as far as is reasonably possible the effects of HGV traffic in sensitive areas.

10. Before the development is commenced details of the areas to be provided for the [LOADING, UNLOADING,] manoeuvring and parking of vehicles including secure cycle storage shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To ensure the provision and long term maintenance of adequate on-site space for the parking and manoeuvring of vehicles, where on-street parking and manoeuvring would be detrimental to highway safety.

11. No development shall commence until details of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal, to ensure that the proposed development can be adequately drained.

12. Prior to occupation of the development a revised Travel Plan must be submitted and approved in writing by the Local Planning Authority in accordance with the Highways Authorities response (dated 13/03/18). The approved Travel Plan must then be implemented in full.

Reason: In the interests of sustainable development as set out in the NPPF and Policy CS15 of The Approach to Future Development in Waveney to 2021 - Core Strategy Development Plan Document (2009).

13. No development shall commence until details of the implementation, maintenance and management of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the Local Planning Authority. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.

Reason: To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.

14. Notwithstanding the details indicated on the submitted drawings no works shall commence on site, unless otherwise agreed in writing, until detailed drawings for the off-site highway improvement works (widening of Longfullans Lane and formalisation of passing bays together with a signing strategy) have been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the highway improvement works are designed to an appropriate standard in the interest of highway safety and to protect the environment of the local highway corridor.

15. Prior to the first occupation/use of the development hereby permitted, the off-site highway improvement works referred to in Part A of this condition shall be completed to the written satisfaction of the Local Planning Authority.

Reason: To ensure that the highway network is adequate to cater for the development proposed.

16. Six months after occupation of the development Full Travel Plan will need to be submitted and approved in writing by the Local Planning Authority. This Full Travel Plan must include the following information:

- Revised baseline data that includes how both guests and employees travel to the site
- Suitable objectives and targets to reduce the vehicular trips made by both guests and employees to the site, with suitable remedial measures identified if these objectives and targets are not met
- A suitable marketing strategy to ensure that all guests and employees on the site are engaged in the Travel Plan process
- A commitment to monitor the Travel Plan annually on each anniversary of the approval of the Full Travel Plan and provide the outcome in a revised Travel Plan to be submitted to the Local Planning Authority for a minimum of five years using the same methodology as the baseline monitoring
- Full contact details of the Travel Plan Coordinator
- A commitment by the site to fund and maintain the Full Travel Plan for a minimum of five years

Reason: In the interests of sustainable development as set out in the NPPF and Policy CS15 of The Approach to Future Development in Waveney to 2021 - Core Strategy Development Plan Document (2009).

17. No more than one month after each anniversary of the approval of the Full Travel Plan the site must submit to the Local Planning Authority a revised Travel Plan that contains a monitoring report and evidence of the progress made against the agreed objectives and targets identified in the Full Travel Plan. This process must be adhered to for a minimum period of five years.

Reason: In the interests of sustainable development as set out in the NPPF and Policy CS15 of The Approach to Future Development in Waveney to 2021 - Core Strategy Development Plan Document (2009).

18. Before the development is commenced details of the areas to be provided for secure covered cycle storage for employees and details of changing facilities including storage lockers and showers shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: In the interests of sustainable development as set out in the NPPF and Policy CS15 of The Approach to Future Development in Waveney to 2021 - Core Strategy Development Plan Document (2009).

19. Before the development hereby permitted is occupied full details of the electric vehicle charging points to be installed in the development shall have been submitted to the Local Planning Authority and approved in writing.

Reason: To ensure that the development makes adequate provision for electric vehicle charging points to encourage the use of electric vehicles in accordance with paragraph 3.4.2 of the Suffolk Guidance for Parking and paragraph 35 of the National Planning Policy Framework.

20. The development hereby permitted shall not be occupied until details of all Sustainable Urban Drainage System components and piped networks have been submitted, in an approved form, to and approved in writing by the Local Planning Authority for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as per s21 of the Flood and Water Management Act.

21. No development shall commence until details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the Local Planning Authority. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP and shall include:

Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include :-

- i. Temporary drainage systems
- ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses
- iii. Measures for managing any on or offsite flood risk associated with construction

Reason: To ensure the development does not cause increased flood risk, or pollution of watercourses in line with the River Basin Management Plan.

22. No development shall take place within a phase or sub-phase of the area indicated [the whole site] until the implementation of a programme of archaeological work for that phase has been secured, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority. The scheme of investigation shall include an assessment of significance and research questions; and:

- i. The programme and methodology of site investigation and recording
- ii. The programme for post investigation assessment
- iii. Provision to be made for analysis of the site investigation and recording
- iv. Provision to be made for publication and dissemination of the analysis and records of the site investigation
- v. Provision to be made for archive deposition of the analysis and records of the site investigation
- vi. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.

- vii. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

No buildings within a phase or sub-phase shall be occupied until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under Condition 1 and the provision made for analysis, publication and dissemination of results and archive deposition.

REASON: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Policy CS17 of Waveney District Council Core Strategy Development Plan Document (2009) and the National Planning Policy Framework (2012).

23. Prior to the commencement of development ecological mitigation in the form of a Landscape and Ecology Management Plan (LEMP) shall be submitted to and agreed in writing with the Local Planning Authority.

Reason: To ensure that ecological management is appropriate for the site and its surroundings.

24. Planting and landscape management on the sites shall be carried out in accordance with the Landscape Management Plan document (reference SHF.201.033.L.R.003) and Landscape Specification (Reference SHF.201.033.L.R.002A) as submitted on 21 June 2018.

Reason: To ensure the landscape and planting required is carried out to the satisfaction of the local planning authority and maintained in an appropriate manner

BACKGROUND INFORMATION:

See application ref: DC/18/0813/COU at www.eastsuffolk.gov.uk/public-access

CONTACT

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