

**Planning Committee – 13 October 2015**  
**Agenda Item 6**  
**DC/15/1627/COU – Smith and Sons Caravan Park, Blackheath Road, Lowestoft**

Council ref: DC/15/1627/COU

Change of use to caravan site at Blackheath Road, Lowestoft NR33 7JH

Response to officer report to committee

Please report this response in full to the committee on 13 October 2015.

The sole proposed reason for refusal is unsustainable. If the application is refused, an appeal will be lodged with a hearing requested. An application for costs will be sought, and can be expected to succeed, having account of the following:

1. The alleged lack of a sequential flood risk test is incorrect (refer to paras. 4.22-26 of the committee report). A flood risk assessment was submitted with the previous application on the adjacent site (by Michael Thomas Consultancy, a respected firm of flood risk consultants), and accepted by the Environment Agency, who raise no objection (and did not object when the adjacent caravan site was permitted in 2013). The conclusions to that assessment make it clear that flood risk is minimal, especially with the improved A12 providing a significant flood barrier (see 6.2 of the Thomas report). Furthermore, CLG planning guidance on applying the sequential test to individual applications (reference 7.033-20140306 in the Planning Portal) makes clear that application of the sequential test 'will be defined by local circumstances relating to the catchment area for the type of development proposed' and a 'pragmatic approach on the availability of alternatives should be taken. For example, in considering planning applications for extensions to existing business premises it might be impractical to suggest that there are more alternative locations for that development elsewhere.' This applies to the application proposal.
2. Reference is made to Policy CS12 on Traveller Sites (see 6.4 of report), but that policy does not refer to flood risk. I have already made submissions on need for traveller sites, having regard to the GTANA (emails of 24 July and 17 September). The proposal complies with Policy H of the recently revised CLG Planning Policy for Traveller Sites. The proposed development would provide accommodation for those who do not wish to go on the Kessingland site, if or when it is expanded.

I trust that the committee will take to correct decision and avoid the necessity for an appeal and associated costs. (I have previously successfully obtained costs against Waveney for another unrelated appeal.)

Dr. Robert Home MA DipTP PhD MRTPI (agent for applicants)