



## Committee Report

**Planning Committee North – 8 August 2023**

**Application no** DC/22/2520/FUL

**Location**

Pakefield Caravan Park

Arbor Lane

Lowestoft

Suffolk

NR33 7BE

**Expiry date** 22 September 2022

**Application type** Full Application

**Applicant** Park Holidays UK Ltd

**Parish** Lowestoft

**Proposal** Extension of Pakefield Holiday Park to provide for the following development on land to the west of the park:

1. A new and improved access and main site entrance off the A12
2. New entrance buildings and clubhouse facility
3. The siting of additional static holiday caravans, involving the rollback of existing static caravans away from the coast
4. Environmental improvements and landscaping throughout

**Case Officer** Matthew Gee  
07901 517856  
[matthew.gee@eastsoffolk.gov.uk](mailto:matthew.gee@eastsoffolk.gov.uk)

## **1. Summary**

- 1.1. Planning permission is sought for an extension to the Pakefield Caravan Park, to include a new access onto the A12, a new entrance and clubhouse building, the siting of 86 units on the site, and environmental improvements and landscaping.
- 1.2. The proposed new access from the A12 is deemed safe by officers in consultation with Suffolk County Council Highways Authority, and it would also provide a benefit by removing a significant number of vehicle movements from the existing site entrance. Furthermore, the proposed development is not considered to result in any significant adverse impacts upon the character and appearance of the countryside. The development would not result in the coalescence of Kessingland and Lowestoft.
- 1.3. An acoustic report has been submitted which identifies that the impact from noise on nearby receptors would be to an acceptable level, and the development would not result in long term amenity impacts upon the living conditions of neighbouring residents.
- 1.4. The impact on protected species can be appropriately mitigated, and the proposal would provide environmental benefits along the southern boundary, with additional planting around the site. The proposed development would also provide electric vehicle charging points, cycle storage, and solar panels on the clubhouse.
- 1.5. A draft Habitat Regulation Assessment (HRA) has been undertaken, and is currently being reviewed by Natural England, the outcome of which will be presented to members in the update report.
- 1.6. There would be an economic benefit arising to the local area due to increased spending from users of the additional accommodation and improved facilities, as well as securing the long term future of Pakefield Caravan Park and its ability to adapt to the challenges of coastal erosion.
- 1.7. The application is therefore deemed to accord with the Waveney Local Plan and the NPPF, and as such the application is recommended for approval.
- 1.8. Authority is sought to Approve, subject to conditions; and subject to officers undertaking an Appropriate Assessment, and concluding that the scheme will not have likely significant effects on European (Habitats) Sites, following the consideration of any comments received from Natural England.

## **2. Site Description**

- 2.1. Pakefield Holiday Park ("The Park") is an established static holiday caravan park located to the southeast of Pakefield, and occupies a coastal location with direct access to the beach over an area of approximately 8.6 hectares (21.3 acres).
- 2.2. The park has planning permission for a total of 391 static holiday caravans and is effectively split either side of Arbor Lane, with each side of the park operating by virtue of separate planning permissions.

- 2.3. The northern element of the site (previously known as “The Bushes Site”), accommodates 119 static caravans and has recently been granted 12 month holiday season on appeal in 2022.
- 2.4. The southern element (formerly known as “Cresta” and “Clifftop” sites) accommodates 231 caravans, and benefits from an unrestricted static holiday caravan permission with no defined holiday season under reference W8089/12. A small section of this area to the west has recently been granted the exchange of touring to static caravan pitches.
- 2.5. The application site, edged red on the submitted Location Plan, covers an area of approximately 4.2 hectares (10.4 acres). The established use of the land is agricultural; however, the site is not currently in active farming use. The extension land is low lying and is bordered to the north by existing residential development along Jubilee Road, to the east by Pakefield Caravan Park and to the south by agricultural/open land. The western boundary of this land has a direct vehicular access point onto the A12.
- 2.6. The western section of the application site contains several agricultural buildings, associated infrastructure and hardstanding areas with the eastern section being agricultural land with a pond/tree planting on the south-eastern section.

### **3. Proposal**

- 3.1. Planning permission is sought for an extension of Pakefield Holiday Park onto land to the southwest of the existing site, currently in use as agricultural land. The expansion will accommodate the following:
  - i. A new and improved access/main site entrance off the A12, and restrictions to existing access off Arbor Lane;
  - ii. New central facilities complex, including
    - a) Bar and restaurant
    - b) Swimming pool
    - c) Changing facilities
    - d) Kitchen facilities
    - e) Reception
    - f) Office space (including sales office)
    - g) Plant rooms
    - h) Outside seating and terrace
    - i) Bathroom facilities
    - j) Three accessible parking bays and 24 standard bays
    - k) Service area and loading bay
  - iii. The siting of 86 static holiday caravans which will include a mixture of single, twin, and larger twin units.
  - iv. Environmental improvements, landscaping, and attention ponds
  - v. Vehicle and pedestrian access to existing site
- 3.2. During the course of the application, additional reports and amended drawings have been received. The amendment drawings have resulted in minor changes to the site entrance to overcome initial concerns raised by the Highways Authority. These amended plans have been subject of further public consultation.

## 4. Consultations

### Third Party Representations

- 4.1. Twenty-four Representations of support have been received, raising the following key points:
- Economic benefits
  - Decreased traffic in local road due to new access and improved safety
  - Improvement to amenity
  - Proposed land not currently in use
- 4.2. Three Representations have been received that neither support nor object, but raise the following key points:
- No impact from additional facilities
  - Relocation of signage to ensure new entrance is used
  - Decreased traffic on minor local roads
  - Access should be provided for local residents to facilities
  - Existing strip of public grass on cliff be kept public
  - Density and arrangement need to be considered
  - Landscaping
- 4.3. Sixty Representations of objection have been received, raising the following key points:
- Land should be retained for agriculture
  - Existing development forms the edge of Pakefield and this development would expand into the countryside
  - Impact of new access on safety along the A12
  - Impact on existing amenity from increased noise levels
  - Impact on biodiversity
  - Impact on amenity from increased activity
  - Better alternative uses for the site
  - Impact on local services and infrastructure from increased visitors
  - Fire hazard
  - Light pollution
  - Previous refusals on the site
  - Impact of development on the ditch along the north boundary
  - Impact from construction noise and activity
  - Boundary concerns
  - Increased number using inadequate existing access arrangements
  - Increased air pollution and impact on health
  - Overlooking and privacy concerns
  - Impact on character and appearance of the area
  - Loss of view
  - Security and anti-social behaviour
  - Poor design
  - Security concerns due to lack of boundary treatment along north boundary
  - Impact on light
  - Increased risk of flooding
  - Increased traffic

- Removal of green space
- Overdevelopment
- Development on Green Belt

Parish/Town Council

Consultee	Date consulted	Date reply received
Lowestoft Town Council	20 July 2022	3 August 2022
<p>Summary of comments:            Lowestoft Town Council has considered this application and agreed to recommend refusal of the application as presented. The application represents a large scale over development of an area which will impact the local amenity both in terms of noise and intrusion of privacy as well as disturbing and harming habitats/wildlife. The new access road will be straight from the A12/A47 and it is essential that comments are sought from Suffolk Highways and National Highways.</p>		

Consultee	Date consulted	Date reply received
Gisleham Parish Council	21 July 2022	31 July 2022
<p>Summary of comments:            Councillors considered this Application at their meeting on 27th July. They were concerned that this site is an inappropriate location for a holiday park, being very closely adjacent to residential properties, particularly in Jubilee Road. There was also concern about the apparent lack of a landscaped / buffer zone along this boundary which could adversely affect those properties, particularly potential noise from the clubhouse and adjoining facility buildings. Councillors were also concerned about the new access to the A12, the section of which is currently the subject of local concern. Questions were raised about the size, location and visibility splays of the new entrance, whether the width is sufficient to allow for larger vehicles, particularly those delivering or removing static caravans and what provision will be available, on site, to allow vehicles to pull off the main road and avoid congestion on the A12. Will there be any restrictions to avoid crossing the A12 to either enter, or leave, the site?</p> <p>Given these concerns, Councillors recommend this Application be REFUSED</p>		

Re-consultation consultees

Consultee	Date consulted	Date reply received
SCC Highways Department	16 November 2022	23 December 2022
<p>Summary of comments:            Holding objection until the information has been submitted:            - Access details for queuing traffic            - Access crossover, crossing the cycle path.</p>		

(officer note: holding objection removed by comments received 20 February 2023; see response below).

Consultee	Date consulted	Date reply received
SCC Flooding Authority	9 February 2023	1 March 2023
Summary of comments: Following the submission of further information, no objections raised.		

Consultee	Date consulted	Date reply received
SCC Highways Department	17 February 2023	20 February 2023
Summary of comments: No objections subject to conditions  "With the revised technical note and plans, my concerns have been addressed."		

#### Consultation Comments

Consultee	Date consulted	Date reply received
SCC Highways Department	20 July 2022	23 September 2022
Summary of comments: Recommend a holding objection until the following information has been submitted: - More detail on Access from A12 or all user types. - Lack of sustainable links to wider network. - More detail on existing access and it's downgrading and use as cycle route/emergency access and impacts on highway maintained land. - Surface water drainage at highway boundary		

Consultee	Date consulted	Date reply received
Network Rail Property (Eastern Region - Anglia)	20 July 2022	No response
Summary of comments: No comments received.		

Consultee	Date consulted	Date reply received
SCC Flooding Authority	20 July 2022	11 August 2022
Summary of comments:		

Holding objection raised as several issues need addressing including; further information to clarify the function of the exiting watercourses on site. Confirmation on use of ponds and site drainage.

Consultee	Date consulted	Date reply received
SCC County Archaeological Unit	22 August 2022	25 August 2022

Summary of comments:

No objections, the application is supported by a geophysical survey and a thorough and comprehensive Historic Environment Desk-Based Assessment which concludes that the site has potential for remains, particularly of the prehistoric and Romano-British periods, and the standing buildings on the site in the farmstead (County Historic Environment Record LWT 407) was also identified as potentially being worthy of further recording. Therefore, full suite of archaeological conditions is required.

Consultee	Date consulted	Date reply received
Environment Agency - Drainage	22 August 2022	No response

Summary of comments:

No comments received.

Consultee	Date consulted	Date reply received
East Suffolk Head Of Coastal Management	21 July 2022	9 August 2022

Summary of comments:

No objections, comments incorporated into officer considerations.

Consultee	Date consulted	Date reply received
East Suffolk Environmental Protection	20 July 2022	28 July 2022

Summary of comments:

Contaminated Land concerns raised as the submitted Phase 1 report has been prepared on the basis of a different form of development, the report will need to be revised to assess the site against the actual proposed development. Further information in respect of the site investigation is also required.

In regards to noise and odour the proposed introduction of the club house will introduce multiple, potentially significant noise sources in very close proximity to existing dwellings on Jubilee Road. A competent acoustic assessment is therefore required which should assess the proposed development in detail, identify any potentially significant sources of noise and assess the impacts that noise from these sources may have on current dwellings. In addition, an odour assessment is required for the kitchen.

Consultee	Date consulted	Date reply received
East Suffolk Ecology	20 July 2022	24 August 2022
Summary of comments: No objections, comments incorporated into officer considerations		

Consultee	Date consulted	Date reply received
East Suffolk Landscape Team	20 July 2022	10 August 2022
Summary of comments: No objections, comments incorporated into officer considerations.		

Consultee	Date consulted	Date reply received
Disability Forum	20 July 2022	No response
Summary of comments: No comments received.		

Consultee	Date consulted	Date reply received
SCC Emergency Planning	20 July 2022	No response
Summary of comments: No comments received.		

Consultee	Date consulted	Date reply received
Police - Design Out Crime Officer	20 July 2022	No response
Summary of comments: No comments received.		

Consultee	Date consulted	Date reply received
SUSTRANS	20 July 2022	No response
Summary of comments: No comments received.		



Consultee	Date consulted	Date reply received
Essex And Suffolk Water PLC	22 August 2022	No response
Summary of comments: No comments received.		

Consultee	Date consulted	Date reply received
Anglian Water	22 August 2022	23 August 2022
Summary of comments: No comment		

Consultee	Date consulted	Date reply received
Suffolk Wildlife Trust	N/A	22 August 2022
Summary of comments: Holding objection to this application as no Great Crested Newt survey report has been submitted with this application, therefore there is insufficient ecological information to determine this application.		

Consultee	Date consulted	Date reply received
SCC Flooding Authority	16 November 2022	5 December 2022
Summary of comments: Holding objection as further information and clarification required.		

Consultee	Date consulted	Date reply received
East Suffolk Private Sector Housing	16 November 2022	13 January 2023
Summary of comments: Confirm that the proposed alterations to the site will require an amendment to the Caravan Site Licence under the provisions of the Caravan Sites and Control of Development Act 1960.  Revised conditions would be attached to the licence in respect of: <ul style="list-style-type: none"> <li>- Site boundaries</li> <li>- Density and spacing</li> <li>- Roads and footpaths</li> <li>- Hard-standings</li> <li>- LPG storage</li> <li>- Electrical installation</li> <li>- Water supply</li> <li>- Drainage</li> </ul>		

- Refuse disposal
- Parking
- Notices

The conditions would be based on Model Standards applied appropriately to the application site.

Consultee	Date consulted	Date reply received
East Suffolk Environmental Protection	2 December 2022	No response
Summary of comments: Following the submission of further information, no objections raised.		

## 5. Publicity

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

Category	Published	Expiry	Publication
Major Application	29 July 2022	19 August 2022	Beccles and Bungay Journal

Category	Published	Expiry	Publication
Major Application	29 July 2022	19 August 2022	Lowestoft Journal

## 6. Site notices

General Site Notice	Reason for site notice: Major Application Date posted: 25 July 2022 Expiry date: 15 August 2022
---------------------	---

## 7. Planning policy

WLP1.1 - Scale and Location of Growth (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.15 - New Self Catering Tourist Accommodation (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.24 - Flood Risk (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.25 - Coastal Change Management Area (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.28 - Sustainable Construction (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.29 - Design (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.30 - Design of Open Spaces (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.34 - Biodiversity and Geodiversity (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.35 - Landscape Character (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.36 - Coalescence of Settlements (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.37 - Historic Environment (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.40 - Archaeology (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

National Planning Policy Framework 2021 (NPPF)

## **8. Planning Considerations**

### Policy and Legislative Background

- 8.1. Section 38(6) of the Planning and Compulsory Purchase Act requires that, if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts, determination must be made in accordance with the plan unless material considerations indicate otherwise. The relevant planning policies are set out in section six of this report.
- 8.2. The Development Plan comprises the East Suffolk (Waveney) Local Plan 2019 (“The Local Plan”) and any neighbourhood plans in place (there is no such plan covering the parish of site area).
- 8.3. The NPPF is also a key material consideration in decision-taking.
- 8.4. A screening opinion under the EIA Regulations was sought prior to an application being made. The Local Planning Authority concluded that an Environmental Statement was not required – i.e., the development was ‘screened out’, for EIA purposes.

### Principle of Development

- 8.5. The Local Plan notes the importance of the tourism sector to the area’s economy and seeks to support tourist offerings where appropriate and compliant with other Local Plan policies. Furthermore, the NPPF sets out the importance of supporting economic growth in areas and achieving well designed places.
- 8.6. Applications for new self-catering tourism development are determined in accordance with policy WLP8.29. The policy clarifies that where proposals are for expansion or intensification of an existing site, the resultant number of pitches or units will determine which consideration is given.
- 8.7. The application proposed 84 additional pitches, policy WLP8.15 identifies that Large sites (80+ pitches/units) will be supported where:

1. They are in or close to Lowestoft, the market towns, or the coastal resort towns of the District;
  2. A Transport Assessment has been submitted demonstrating no significant impacts on the highway network;
  3. Safe and convenient access to public transport and local services and amenities are provided;
  4. Covered cycle storage proportionate to the size of the site is provided on site; and
  5. Commercial, recreational or entertainment facilities are provided on site.
- 8.8. The application site is located adjacent and directly links into the existing Caravan Park site, with the application site replacing existing facilities within that site. The proposal is well located to Pakefield and Lowestoft, and would provide direct access for the site from the adjacent A12. As such the proposal is deemed compliant with points 1 and 5.
- 8.9. Consideration of points 2, 3, and 4 are fully assessed under the Highways and Transport section, however, to summarise officers and statutory consultees consider there to be no significant impacts on the highway network, and there would be safe and convenient access to public transport. The site would also provide cycle storage. Furthermore, the site is located in close proximity to local shopping and dining facilities to the west.
- 8.10. The principle of the development is therefore entirely supported by the Local Plan spatial strategy and specifics of WLP8.15.

#### Holiday occupation and restrictions

- 8.11. Policy WLP8.15 sets out that “New self catering tourist accommodation will be restricted by means of planning conditions or a legal agreement which permits holiday use only and restricts the period the accommodation can be occupied.” The preamble for the policy sets out that enforcing against breaches of holiday occupancy conditions can be extremely challenging and it is preferable to prevent breaches occurring in the first instance. It is therefore important to set out precise and enforceable conditions or legal agreements which discourage residential use and which can be effectively enforced. As such, planning conditions or legal agreements should require new self-catering tourist accommodation units to be vacated for a specified and continuous period of at least six weeks of the calendar year. In order to facilitate year-round holiday use, the Local Planning Authority will allow proposals to vacate half the site at one time, and the rest of the site later that year.
- 8.12. As set out within section 2 of this report, both parts of the existing park have no closed period, with year round occupation recently granted via appeal on the northern portion of the site. The existing site has permission for 391 static caravans, the proposed expansion is for 86. Given this is an expansion to the site, and that it will directly link into the existing site, it is considered that the application of a closed period for just this area of the park would not be necessary or reasonable.
- 8.13. There have also been no reports of breaches of occupation on the site to the council.
- 8.14. However, a condition will be applied preventing the use of the site for any other means other than as holiday accommodation, not to be occupied as someone’s sole or main

residents, and that a logbook be completed for all occupants which should be made available to officers on request.

- 8.15. It is therefore considered by officers that the site could be effectively monitored, and complies with policy.

#### Landscape and Visual Impact

- 8.16. Policy WLP8.29 (Design), sets out that development proposals will be expected to demonstrate high quality design which reflects local distinctiveness. In so doing proposals should:
- Demonstrate a clear understanding of the form and character of the built, historic and natural environment and use this understanding to complement local character and distinctiveness;
  - Respond to local context and the form of surrounding buildings in relation to:
    - the overall scale and character
    - layout
    - site coverage
    - height and massing of existing buildings
    - the relationship between buildings and spaces and the wider street scene or townscape
    - and by making use of materials and detailing appropriate to the local vernacular;
  - Take account of any important landscape or topographical features and retain and/or enhance existing landscaping and natural and semi-natural features on site;
- 8.17. Additionally, Policy WLP8.35 (Landscape Character) sets out that proposals for development should be informed by, and be sympathetic to, the distinctive character areas, strategic objectives and considerations identified within the appropriate landscape appraisals.
- 8.18. Policy WLP8.35 carries on to state that development proposals will be expected to demonstrate their location, scale, form, design and materials will protect and where possible enhance. In addition, include measures that enable a scheme to be well integrated into the landscape and enhance connectivity to the surrounding green infrastructure and Public Rights of Way network.
- 8.19. The councils Principal Landscape and Arboricultural Officer has reviewed the application and raised no objections to the proposal.
- 8.20. The site is currently down to farmland and farm related activity, including a range of farm buildings which are shown for demolition as part of the development proposals. To the north is the residential edge of Pakefield, to the east is the existing holiday park, to the south open land and to the west, the A12 and commercial units. Although the change from farmed use to holiday park is notable, the receiving landscape is not considered to be of any great sensitivity especially given the strong presence of adjacent land uses.
- 8.21. The application has submitted an Arboricultural Impact Assessment & Method Statement The report identified 31 individual trees, 2no. groups and 9no. hedges. The site is

predominately boundary scrub vegetation associated with field boundaries, spreading into onsite areas dominated by blackthorn and elm. The southern and eastern boundaries are marked by broken old growth Hawthorn hedgerows on variable states of maintenance. The only substantial trees within the eastern part of the site area are willows and Alders located in the central pit. The western part of the site includes a greater density of trees associated with past use as paddocks and gardens but these are in very poor condition.

- 8.22. The boundary hedgerows to the south offer significant screening. Larger specimens may be visible from some distance but otherwise the trees identified within the survey are of low landscape significance. The amenity value of the trees is limited by the visual envelope however the mature stock does offer maturity of character to the site and retention would soften the impact of development in aesthetic terms.
- 8.23. In order to facilitate the proposal 15no. trees, 8no. groups and a hedge are required to be removed. These are as follows:
- T3 T5 T6 T7 ivy covered Elms, which are dead
  - T17 Sycamore T18 multi-stemmed Crack Willow, in fair condition
  - T21 Black Elder, in fair condition
  - T22 small Wild Cherry, in fair condition
  - T23 small Ash, in fair condition
  - T24 Black Elder, in fair condition
  - T25 T27 T28 (3 x Hawthorn) , in fair condition
  - T29 Black Elder, in fair condition
  - T31 Goat Willow, in fair condition
  - G1 Crack Willow, in good condition
  - G10 Crack Willow, in good condition
  - G12 unmanaged Blackthorn along ditch, , in fair condition
  - G13 dense Blackthorn scrub, in fair condition
  - G14 scattered young Hawthorn, in fair condition
  - G15 Leyland cypress (storm damaged / deadwood) , in poor condition
  - G17 dense scrub mix Blackthorn, Willow & Damson, in fair condition
  - G19 scattered young Hawthorn, in fair condition; &
  - H8 neglected Ivy covered Hawthorn / Blackthorn on ditch bank, in fair condition
- 8.24. 3 x groups require partial removal, these include:
- G16 dense area of scrub Blackthorn & Damson Fell/remove scrub to provide 1.5m clearance from proposed static caravan/lodge unit
  - G18 dense Blackthorn scrub Fell/remove scrub to provide 1.5m clearance from proposed static caravan/lodge unit.
  - H5 Hawthorn & Elm Fell/remove scrub to provide 1.5m clearance from proposed static caravan/lodge unit.
  - H9 Ivy covered Hawthorn Fell section to enable site access as shown on AIA plan
- 8.25. T2 Oak, which is noted as been the tree of greatest value, is situated off site & should not be adversely affected by proposal protective fencing as illustrated on Arboricultural Impact Assessment Plan.

- 8.26. Whilst some existing trees and scrub will need to be removed especially in respect of the new access, new planting is proposed in mitigation. Many existing trees are to be retained and protected during construction.
- 8.27. The southern edge of the development area is shown as being left for green space and the existing pond features are to be retained. New planting is proposed which is considered to enhance this area, establish a valuable degree of screening from views from the south, and help assimilate the area into the wider landscape.
- 8.28. There will be some disruption to local landscape character arising from the demolition/construction phase, but this is considered to be relatively short lived and will mainly focus on the demolition phase, and temporary stockpiles of excavated materials.
- 8.29. On completion, the new clubhouse and caravans are deemed to have a minor adverse effect on the character of the site itself, but once new planting begins to mature, any effects on the surrounding locality is deemed by the Principal Landscape and Arboricultural Officer to be slight, changing to neutral over time.
- 8.30. In visual impact terms, the site is generally well contained with existing retained vegetation and buildings to the north, east and west. In respect of more open views to the south, visual receptors are more distant compared to other directions. Visual impacts from construction activity will be mainly limited to local residents to the north, especially from upper floor south facing windows. At worst, for a few receptors being of high sensitivity, visual effects during construction will be substantial/moderate and adverse, albeit for a relatively short period of time, however, this is to be expected from a redevelopment of such a site. It is proposed that the build phase will take place in the closed winter period.
- 8.31. On completion, the finished development will be partially visible with glimpsed views from a limited range of locations in the locality, and such visibility will progressively reduce as new planting matures. The greatest visual effects are considered to be experienced by residential occupants of properties immediately to the north of the new clubhouse and swimming pool building, however, this is considered to be moderated over time by new boundary planting.
- 8.32. Overall, the officers including the principal Landscape and Arboricultural Officer considers that the proposal is well considered in landscape terms and would have no adverse landscape impacts. The new planting is also contributed to local landscape amenity.
- 8.33. The proposal is considered to comply with policy WLP8.35 (Landscape Character), as the proposed new planting is informed and sympathetic to the local landscape distinctiveness which will be protected and enhanced by the new planting. Furthermore, the mitigation planting and retention and protection during construction of existing planting will allow the development to integrate into the local landscape, and improving connectivity with local green infrastructure.
- 8.34. Policy WLP8.36 (Coalescence of Settlements), sets out that development of undeveloped land and intensification of developed land between settlements will only be permitted where it does not lead to the coalescence of settlements through a reduction in openness and space or the creation of urbanising effects between settlements.

- 8.35. The development is set outside of the settlement boundary, between Lowestoft and Kessingland which is identified in the policy as an important gap. However, given the screening that would be retained and proposed, and the physical separation distance that would still be retained, it is considered that there would be sufficient gap between the settlements of Lowestoft and Kessingland as to not result in the coalescence.

#### Highways and Transport

- 8.36. Policy WLP8.21 promotes sustainable transport, which also includes development that is safe in highways terms. The NPPF sets out (inter alia) that:
- 8.37. Paragraph 110 - "it should be ensured that... (b) safe and suitable access to the site can be achieved for all users"; and
- 8.38. Paragraph 111 - "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."
- 8.39. The existing site is accessed via Grayson Avenue and Arbor Lane off the B1532, this is reported to lead to several issues particularly around traffic and disruption given these are mainly residential roads. The proposal seeks to construct a new access directly off the A12 to serve the expansion site as well as the existing site. This new access has been designed as a left in left out only access, to minimise the disruption to vehicles using this section of the A12 which is located between two roundabouts situated approximately 170m to the north and 350m to the south of the access.
- 8.40. The application includes measures to limit/stop the use of the existing access. Access along Arbor Lane towards the beach has created difficulties with this arrangement as it in effect severs the site in two. It is proposed that:
- There would be no vehicular access for southernmost section of the existing holiday park and proposed extension via Arbor Lane.
  - Access via Arbor Lane would be maintained for the existing northernmost section of the holiday park and the private dwellings within the site to the east.
  - The main access to the existing reception and club house stopped up with bollards.
  - To restrict holiday makers of the southernmost section of the existing holiday park and proposed extension using the Arbor Lane access, three existing barriers would be amended, to always remain down, and operated with a 'key-fob' system to only allow staff access at any time. No owners or holiday guests would have access to use these barriers to ensure that vehicles associated with the extension / southern section do not traverse across the site and use the Arbor Lane access as a shorter route to Pakefield
  - All deliveries, refuse vehicles, new and replacement static caravans associated with the entire holiday park (existing and proposed) will utilise the new A12 access into the site, rather than Arbor Lane.
- 8.41. The applicant has advised that all caravan owners will be informed of this change of access arrangement and informed to arrive at the A12 access to receive their welcome pack as part of the arrival protocol (as part of their booking information). Following this they will be informed how to get to their caravan – whether this to be to use the internal network



for the southernmost existing section and proposed extension, or to go round to the Arbor Lane access for the northern existing section.

- 8.42. This is considered to provide a significant benefit to existing residents along Arbor Lane and Grayson Avenue as it would take away HGV movements associated with the development on this road, as well as significantly reduce the number of vehicles movements within the surrounding residential roads. It is noted that some short term impacts may occur whilst people get used to the arrangements however, this is not considered to be long term.
- 8.43. The site access road from the A12 would be 6 metres in width for the first 30 metres, and then narrow down to a width of 4.8 metres. At a point 15 metres into the site, a raised table crossing with priority to pedestrian and cyclists would be provided to allow these movements along the A12 to cross the mouth of the junction. A 2m wide footway along the northern edge of the access from the crossing would provide pedestrian access into the site. It is proposed that the internal road will be a shared space, and as such traffic calming measures are proposed.
- 8.44. Existing vegetation cut back to pedestrian visibility splay lines for improved junction safety, and 120m long vehicle visibility splays will be provided.
- 8.45. The entry and exit barrier will be located 50m to the east of the A12. The barrier will be on a 'key-fob' system, with an intercom to reception also provided should a guest not have their access key fob. All owners will already have been issued a fob to allow them to freely enter and exit throughout the day. For holiday guests, prior to arrival, the park will make up welcome packs, including keys and barrier fobs for each guest. On arrival, holiday guests will park up in one of the 5 designated spaces provided before needing to pass through the barrier to allow any first-time check-in guests to park up and pick up their 'key-fob'.
- 8.46. The applicant has set out that in the event there are a large number of check-ins (i.e. on a bank holiday), holidaymakers would be told to park at the main complex rather than reception to give additional space to deal with high volumes. If in any unlikely event there was a queue the park would leave the barriers open to avoid queuing into the A12. In addition, in event of a power cut, the barrier can be raised manually or unbolted in the event of damage.
- 8.47. The TRICS assessment undertaken as part of the Transport Statement confirmed that the combined development of 386 static caravans (300 existing & 86 proposed) could generate a total of 27 two-way movements in the morning peak hour and 62 two-way movements in the evening peak hour at the new A12 junction. During the busiest evening peak period, this would equate to 28 arrivals and 34 departures. Therefore, on average, there would be 1 arrival, and 1 departure, every 2 minutes, in the busiest peak period. It is noted that not all of these arrivals will be new guests with a number of existing guests entering the site using their access fob to facilitate immediate entry. Based on the site's trip generation during the busiest peak period, a car would need to remain stationary at the entrance barrier for 12 minutes before it would result in a queue of 6 vehicles and blocking back onto the A12 could occur.

- 8.48. Suffolk County Councils Highways team has reviewed the application and following the submission of further information they consider the proposal to be acceptable subject to a number of conditions including off site works.

#### Economic Considerations

- 8.49. The Waveney Local Plan identifies the importance of the Tourism Sector to East Suffolk. Waveney is home to a diverse range of natural and cultural tourist attractions and the tourism industry is a vital part of Waveney's economy. The East Suffolk Business Plan strives to build on the strength of the tourism economy and sets out the aims of increasing visitor numbers outside of the main tourist season. Supporting the industry is of great importance but it must not be at the expense of the assets and attractions that draw people in to the area.
- 8.50. Within the submitted Design, Access and Planning Statement, the applicant has detailed their economic case for the proposed development. These are:
- Improvements to the type and quality of holiday accommodation on offer through the siting of larger static caravans at the required spacing, and the provision of a new proposed central facilities complex; with a new site entrance.
  - The relocation of the coastal element of Pakefield Holiday Park through moving holiday accommodation away from an area already being diminished by coastal erosion;
  - Securing the long term sustainability of Pakefield Holiday Park as a rural business and key tourism employer in the local area.
- 8.51. The applicant details that the development will allow them to provide facilities and accommodation, in line with modern day consumer demand and trends for more spacious accommodation. In addition, it would provide sustainability of the park through reducing the threat currently posed by coastal erosion. The applicant has noted that the 'rollback' of the park by utilising land this land away from the coast will have a significant role in decreasing the risk to people and property in the future as a result of the coastal erosion problem. Long term, the park is at risk due to its location directly adjacent to the coast as evidenced by the loss of 23 static caravan pitches since 2018.
- 8.52. Furthermore, the redevelopment will result in the creation of additional full and part-time jobs, both through the construction phase and long term management of the park, as well as sustaining jobs long term. It is also considered to result in improved direct and indirect off-site spend into the local economy and wider community.
- 8.53. Officers agree with the applicant's claim that this is an important tourism asset that should be enabled to protect the existing accommodation and secure a long-term future for the park.
- 8.54. The Council's Economic Development Team have been consulted on the application. Any comments received will be included in the update sheet/report.

#### Amenity

- 8.55. The proposed introduction of the club house will introduce multiple, potentially significant noise sources into the immediate existing dwellings on Jubilee Road, located

approximately 35m north. In particular there will be plant associated with the kitchen (flues, air intake and extraction systems, refrigeration etc), air conditioning units and pool plant. In addition, the club house itself could be a significant source of noise in connection with its use.

- 8.56. The proposed clubhouse has been designed to mitigate acoustic impacts, with measures such as the side entrance to the clubhouse being lobbied and other opening doors onto the patio area located in the façade facing away from the nearby receptors. It is also noted that the proposed clubhouse would be built to modern technical standards and therefore would have a greater acoustic design to the existing clubhouse at Pakefield.
- 8.57. The applicant has also confirmed that the main use of the bar/restaurant area would be as a bar/restaurant with only occasional (once per quarter) live entertainment events, similar to those already undertaken within the existing clubhouse. It has also been confirmed that that any live music events would only take place up to 22:30 hours.
- 8.58. The report identifies that any recorded/live music event would have a noise level of 85dB(A) at 1m from the source of the music, i.e., the speaker/amplifier. On occasions when these events take place noise levels at the nearby properties may increase by around 3dB up to 11pm. With penalties applied for intermittent and impulsive content of the noise source, rating levels within garden spaces of the nearest receptors would be around 39dB; which would be 3dB above the daytime measured background sound level. This would fall below the level at which an adverse impact would occur according to BS4142. It should also be noted that the predicted noise levels would remain below the existing measured 40dB LAeq at the properties.
- 8.59. The Councils Senior Environmental Protection Officer has reviewed the application, and the reports submitted as part of and during the course of this application. The submitted noise assessment predicts that noise from the club house will arrive at the nearest sensitive receptor at, or around, existing background levels and have a low impact on occupants. It has been recommended that conditions be applied that in line with the information underpinning the noise information. As such a condition is proposed restricting live music to no later than 10:30pm.
- 8.60. The submitted kitchen odour assessment has determined that the risk of adverse odour impacts is high and that a high level of odour mitigation will be required. In order to ensure that the appropriate measures are installed a condition will be required to ensure that the applicant submits details proposals and specifications for the intended odour abatement measures. Those measures would need to accord with the submitted odour assessment and the EMAQ guidance document 'Control of Odour and Noise from Commercial Kitchen Exhaust Systems'. Thereafter, the installed measures would be required to be serviced and maintained in accordance with the manufacturers guidance to ensure that they remain effective.
- 8.61. The site plan shows the placement of caravans towards the north boundary with properties along Jubilee Road. The plans show that 25 units will be positioned along this boundary at approximately 4 – 7m from the boundary, with a further 6 units in the 'showground' area. However, the precise locations are not dictated by planning as the application is for change of use of the land to site caravans, but by the site license which controls matters such as site boundaries, density and spacing.

- 8.62. The properties along the northern boundary of the site are a mixture of single and two storey dwellings, as well as caravans, with a variety of boundary treatments along the boundary. The proposal seeks to plant a row of trees along this boundary with existing planting retained to the west, this is deemed to provide screening between the site and these residential properties. The caravans would be of standard design and single storey scale, and as such there is deemed to be no loss of light. In addition, whilst there may be limited loss of privacy whilst the planting establishes, overtime this impact would lessen. The landscaping condition would also require that any planting that dies within 5 years to be replaced.
- 8.63. Therefore, subject to appropriate conditions the proposed impact on the amenity of neighbouring residents is not deemed to adversely impact upon their enjoyment of their dwelling to warrant refusal of this application, and therefore accords with policy WLP8.29.

#### Ecology and Biodiversity

- 8.64. Policy WLP8.34 sets out the policy position for Biodiversity and Geodiversity. The policy sets out that where there is reason to suspect the presence of protected species or habitat, applications should be supported by an ecological survey, and if present the proposal must be sensitive to, and make provision for their needs. A Preliminary Ecological Appraisal and Protected Species Surveys report and a Bat Survey Assessment report.
- 8.65. The council's Ecologist has reviewed the application and the submitted reports. The submitted surveys identify that in the absence of appropriate mitigation the proposed development could result in adverse impacts on several protected and/or UK Priority species (under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006)), including great crested newts, reptiles, badgers and nesting birds.
- 8.66. The survey reports provide several mitigation measures, including:
- Appointment of an ecologist acting as an Ecological Clerk of Works (ECoW)
  - Removal of suitable nesting habitats outside of breeding season
  - Requirement to obtain a Natural England licencing consent in relation to targeted Great Crested Newt mitigation
  - Measures to ensure no grass snakes come to harm
  - A one way temporary exclusion fence will be installed across the site to separate the developable area from the conservation area.
  - All reptiles and amphibians habituated to the developable area of the site will be translocated into the receptor area.
- 8.67. The Ecologist has reviewed the mitigation measures detailed within the submitted Preliminary Ecological Appraisal and Protected Species Surveys report and has agreed with all of the mitigation measures detailed within that report. These measures would be required by any condition on an approval.
- 8.68. The Preliminary Roost Assessment (PRA) determined that three of the buildings had low to moderate potential to support roosting bats, these buildings were subsequently subject to nocturnal surveys, carried out in suitable weather conditions in August 2021, to establish if they are used by roosting bats. These surveys recorded no bats roosting in the on-site

buildings during these surveys, and general bat activity was very low and limited to occasional passes from individual Common and Soprano Pipistrelle.

- 8.69. The report also identifies that all trees were of an age and/or species that do not generally support features of potential value to roosting bats, and all trees were classed as negligible value to roosting bats. Furthermore, the site was classed as being of low value to foraging/commuting bats based on the results of the nocturnal surveys and habitat assessment.
- 8.70. The Bat Survey and Assessment Report therefore identifies that there were no records of any bats roosting on the site but recommends updated surveys for bats prior to the demolition of buildings if works are delayed beyond 2022. In this instance given that the initial surveys are relatively recent and were negative, it is considered that any permission could be subject to a condition that these further reports be submitted and approved before any demolition is undertaken.
- 8.71. A mitigation strategy for reptiles will also be required however, this is recommended to be undertaken alongside the mitigation for great crested newt which will be conditioned. This involves the translocation of reptile and amphibians into receptor area.
- 8.72. The report identifies several opportunities for the ecological enhancement of the site, these include:
- Any new plantings around the site incorporates native species of locally sourced stock and include species that will benefit bats/birds and nectar feeding invertebrates;
  - The defunct hedgerow in the south of the site, set for retention, could be planted up with a mix of native hedgerow species;
  - New hedgerows and/or tree screens could be established around the site boundaries;
  - The network of drainage ditches around the site could be restored and planted with appropriate fringing vegetation.
  - The erection of bird and bat boxes on retained trees around the site boundaries.
  - Improve floral diversity within the conservation area through plug-planting, seeding and a meadow management regime.
- 8.73. The development site is within the recreational disturbance Zone of Influence for Habitats Sites (European Sites) in East Suffolk, as set out in the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). The LPA has been seeking appropriate mitigation of tourism uses in the zone of influence to ensure that there is no adverse effect on the integrity of Habitats Sites in East Suffolk.
- 8.74. As the application proposes 84 additional units, this would trigger the threshold of 50+ residential units which requires a Habitat Regulation Assessment (HRA) to be undertaken.
- 8.75. A draft HRA has been undertaken by the Councils Senior Ecologist. In accordance with the mitigation measures identified as part of the Suffolk Coast, the development will include:
- Landscaped onsite open space (of approximately 1.1Ha);
  - A footpath connection from the new development, through the existing caravan park, to Footpath 39 and the beach. This will allow circular walking routes from the site of a variety of lengths up to and exceeding 2.7km.

- 8.76. Whilst it is acknowledged that circular walks utilising this route will, by their nature, have to be in a north-south direction, it is considered that the presence of the beach makes up for this limitation. The implementation and retention of the part of the footpath connection through the existing caravan park will be secured by planning condition;
- 8.77. In addition, in order to conclude that this development will not result in an in-combination adverse effect on the integrity of Habitats Sites the relevant financial contribution to the strategy is also required to be secured prior to determination. Any recommendation to approve is on the basis that this contribution is secured (through planning obligation/legal agreement); or alternative evidence provided to demonstrate that the proposal will not result in an adverse effect on the integrity of Habitats Sites.
- 8.78. Subject to appropriate conditions, confirmation from Natural England that the HRA is acceptable and RAMS contribution (or evidenced alternative mitigation) the scheme would accord with the requirements of Local Plan policy WLP8.34, the NPPF, and the Conservation of Habitats and Species Regulations (2017) (as amended).

#### Coastal Change Management and Re-location of Development Affected by Coastal Erosion

- 8.79. The application site is not situated within the Coastal Change Management Area or the 30m buffer, however, the existing site is and over recent years the existing site has been impacted by coastal erosion.
- 8.80. A Coastal Erosion Vulnerability Assessment (CEVA) has been submitted, and officers from the Coastal Partnership East have reviewed the application, and advised that the CEVA conclusion is that there will be ~84m of erosion immediately east of the new development site over its 75 year life which will not reach the site's eastern boundary within that period.
- 8.81. This estimate of erosion extent to 2095 is more than double that in the SMP and in the 2019 CPE report, both of which are heavily referenced in the CEVA. The report assumes no defences are put in place over the 'No Intervention' policy frontage to resist erosion.
- 8.82. Coastal Partnership East have advised that the CEVA is of reasonable quality and takes a precautionary approach to erosion risk estimation. As such they have recommend that the CEVA be accepted.

#### Sustainability

- 8.83. The application proposes several integrated sustainability measures into the scheme, these include:
- A fabric-first approach to design including use of Energy-efficient building fabric and insulation, and securing a good quality of build to achieve good air-tightness;
  - Installation of Air Source Heat Pumps;
  - Installation of Photovoltaic panel arrays;
  - Cycle storage facilities
  - Vehicle charging points
  - New plantings around the site could incorporate native species of locally sourced stock
  - Ecological enhancements

## Heritage Assets

- 8.84. The application is supported by a geophysical survey and a thorough and comprehensive Historic Environment Desk-Based Assessment. Suffolk County Council Archaeological Service have reviewed the application and support the conclusions of the DBA. The report details that the site has potential for remains, particularly of the prehistoric and Romano-British periods, as indicated by the geophysical survey and information from surrounding sites recorded in the Historic Environment Record. An element of the standing buildings on the site in the farmstead (County Historic Environment Record LWT 407) was also identified as potentially being worthy of further recording.
- 8.85. It has therefore been judged that there is a high potential for the discovery of below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.
- 8.86. There are no grounds to consider refusal of permission in order to achieve preservation in situ of any important heritage assets. However, in accordance with the National Planning Policy Framework (Paragraph 205), any permission granted should be the subject of planning conditions to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.
- 8.87. The nearest listed building to the site is situated approximately 420m north of the site and given the separation distance and development between the application site and the Listed Building there is considered to be no impact on its setting.

## Other Matters

- 8.88. Suffolk County Council Flood and Water Management Team (LLFA) initially raised a holding objection as they required further information in order to provide an appropriate response. Subsequently, the applicant has provided additional information with regards to surface water flooding on the site and following this additional information the LLFA have raised no objections to the proposal subject to conditions.
- 8.89. Concerns have been raised regarding the impact that the additional 88 pitches would have on local services in the area. As the proposal is for tourist accommodation and the units will be conditioned to remain within that use, it is not considered that the demand for local services would be significant to result in significant additional pressures on services.

## **9. Conclusion**

- 9.1. The proposed development is a logical extension to The Park providing significant economic benefits and supporting an existing tourism use. The proposal would ensure that Pakefield Caravan Park can provide modern facilities to visitors to the park whilst also allowing roll back opportunity due to the challenges of coastal erosion in this area.
- 9.2. The proposal is deemed to accord with policy WLP8.15, as an expansion to an existing site which is situated adjacent to Lowestoft with a new access from the A12.

- 9.3. The proposed new access is considered safe and would result in the removal of significant traffic from the local residential road network around the existing access off Arbor Lane. In addition, the proposed extension is not considered to adversely impact upon the character and appearance of the area and would have no adverse impact on protected species whilst providing a level of ecological enhancement along the southern boundary. The proposal is also concluded to have no significant amenity impacts from increased noise or loss of privacy long term.
- 9.4. For the reasons given in this report, the scheme is considered to be an acceptable form of tourism development in accordance with the Development Plan. There are no other material considerations, in combination, that would indicate for a decision other than in accordance with the Development Plan.

## **10. Recommendation**

- 10.1. Authority to Approve, subject to conditions list below; and subject to officers undertaking an Appropriate Assessment and concluding that the scheme will not have likely significant effects on European (Habitats) Sites.

## **11. 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 development hereby permitted shall be completed in all respects strictly in accordance with:

- Site Location Plan, received 23/06/2022
- General Arrangement Plan, 201.129.ENZ.00.XX.DR.L.00.101PL05, received 15/02/2023
- Proposed Clubhouse Floor Plan, 290-06-B, received 23/06/2022
- Proposed Clubhouse Elevations, 290-07-B, received 23/06/2022
- Proposed Clubhouse Roof Plan, 290-09-A, received 23/06/2022
- Perspective view from north-east, received 23/06/2022
- Perspective view from south-west, received 23/06/2022
- Illustrative Masterplan, SHF.201.129.ENZ-XX-XX-DR-L-00-001PL01, received 23/06/2022
- Landscape and Visual Assessment, SHF.201.129.LA.R.00.001, received 23/06/2022
- Soft Landscape Plan Page 1 of 4, 201-129-ENZ-XX-00-DR-L-45-101 PL04, received 15/02/2023
- Soft Landscape Plan Page 2 of 4, 201-129-ENZ-XX-00-DR-L-45-002, received 23/06/2022
- Soft Landscape Plan Page 3 of 4, 201-129-ENZ-XX-00-DR-L-45-003, received 23/06/2022
- Soft Landscape Plan Page 4 of 4, 201-129-ENZ-XX-00-DR-L-45-004, received 23/06/2022
- Soft Landscape Schedule, received 15/02/2023
- Entire Site Plan, 201-129-ENZ-XX-01-DR-L-00-002, received 23/06/2022
- Landscape Management and Maintenance Plan, SHF.201.129.ENZ.LA.R.001, Prepared by Enzygo Ltd, received 23/06/2022
- Flood Risk Assessment (FRA), SHF.201.137.HY.R.001.A, Prepared by Enzygo Ltd dated February 2022, received 23/06/2022



- (FRA) Consultation response, SHF.201.137.HY.R.002.A, Prepared by Enzygo Ltd dated February 2023, received 06/02/2023
- (FRA) Consultation response, SHF.201.129.HY.L.004.A, Prepared by Enzygo Ltd dated February 2023, received 31/03/2023
- Phase I Geo-Environmental Report, SHF.201.129.GE.R.001.A, Prepared by Enzygo Ltd dated June 2022, received 04/11/2022
- Coastal Erosion Vulnerability Assessment (CEVA), SHF.201.129.HY.R.003.A, Prepared by Enzygo Ltd dated June 2022, received 23/06/2022
- Preliminary Ecological Appraisal & Protected Species Surveys, CE21037, Prepared by Co-Ecology dated May 2022, received 23/06/2022
- Bat Surveys and Assessment, CE21037, Prepared by Co-Ecology dated September 2021, received 23/06/2022
- Tree Survey & Arboricultural Constraints Report and Tree Constraints Plan, Prepared by Corsican Associates dated 2 March 2022, received 23/06/2022
- Transport Statement, SF5046PD, Prepared by Sustainable Development and Delivery dated June 2022, received 23/06/2022
- Proposed Sitewide Plan, 290-10-P2, received 23/06/2022
- Design and Access Statement (relating to Central Facilities Building) dated June 2022 Prepared by Laurie Wood Associates, received 23/06/2022
- Geophysical Survey Report, MSST1268, dated 7 June 2022 Prepared by Magnitude Surveys, received 23/06/2022
- Sustainability Statement, LA.AL.NR33, prepared by engergist, received 29/07/2022
- Arboricultural Impact Assessment & Method Statement, CA21/021, Prepared by Corsican Associates dated 19 June 2022, received 29/07/2022
- Tree Protection Plan, 21/021-03, received 29/07/2022
- Noise Impact Assessment, SHF.201.129.NO.R.001, Prepared by Enzygo Ltd, received 04/11/2022
- Additional Acoustic Information, via email, received 09/01/2023
- Kitchen Odour Risk Assessment, SHF.201.129.AQ.R.001, Prepared by Enzygo Ltd, received 10/11/2022

for which permission is hereby granted or which are subsequently submitted to and approved by the Local Planning Authority and in compliance with any conditions imposed by the Local Planning Authority.

Reason: For the avoidance of doubt as to what has been considered and approved.

3. The materials and finishes shall be as indicated within the submitted application and thereafter retained as such, unless otherwise agreed in writing with the local planning authority.

Reason: To ensure the satisfactory appearance of the development in the interests of visual amenity

4. Development must be undertaken in accordance with the ecological avoidance, mitigation, compensation and enhancement measures identified within the Preliminary Ecological Appraisal & Protected Species Surveys (Co-ecology, May 2022) and the Bat Survey Assessment report (Co-ecology, September 2021) as submitted with the planning application and agreed in principle with the local planning authority prior to determination.

Reason: To ensure that ecological receptors are adequately protected and enhanced as part of the development.

5. The development shall not in any circumstances commence unless the local planning authority has been provided, in relation to great crested newts, with either:
  - a) a licence issued by Natural England pursuant to The Conservation of Habitats and Species Regulations (2017) (as amended) authorising the specified development to go ahead or demonstration that the appropriate Natural England Class Licence is in place to allow works to commence; or
  - b) a statement in writing from the relevant licensing body, or a suitably qualified and licenced ecologist, to the effect that it is not considered that the specified development will require a licence.

Reason: To ensure that the legislation relating to protected species (great crested newts) has been adequately addressed as part of the implementation of the development.

6. No removal of hedgerows, trees or shrubs or works to or demolition of buildings or structures that may be used by breeding birds shall take place between 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed 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 bird interest on site. Any such written confirmation should be submitted to the local planning authority.

Reason: To ensure that nesting birds are protected.

7. No development shall take place (including demolition, ground works, vegetation clearance) until a construction environmental management plan (CEMP: Biodiversity) for great crested newts, reptiles, badgers, bats and nesting birds has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) 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.
  - e) The times during construction when specialist ecologists need to be present on site to oversee works.
  - 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) Use of protective fences, exclusion barriers and warning signs.

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: To ensure that ecological receptors are adequately protected as part of the development.

8. Prior to works above slab level a "lighting design strategy for biodiversity" for the areas highlighted within the PEA (Co-ecology, May 2022) shall be submitted to and approved in writing by the local planning authority. The strategy shall:

- a) identify those areas/features on site that are particularly sensitive for biodiversity likely to be impacted by lighting and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and

- b) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.

All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

Reason: To ensure that impacts on ecological receptors from external lighting are prevented.

9. Prior to construction of the club house, hereby approved, an assessment of odours arising from the proposed kitchen details proposals and specifications for the intended odour abatement measures, shall be submitted to, and approved in writing by, the LPA. The assessment should accord with the 'Control of Odour and Noise from Commercial Kitchen Exhaust Systems. An update to the 2004 report prepared by NETCEN for the Department for Environment, Food and Rural Affairs.' If odour control measures are required these should be detailed. Thereafter the development must be completed in accordance with the approved odour assessment, and the equipment serviced and maintained in accordance with the manufacturers guidance to ensure that they remain effective.

Reason: To protect the amenity of neighbouring residents

10. The club house, hereby permitted, shall be constructed and operated in accordance with the recommendations as set out within the Noise Impact Assessment (SHF.201.129.NO.R.001, prepared by Enzygo Ltd), received 04/11/2022.

Reason: To protect the amenity of neighbouring residents

11. The clubhouse, hereby permitted, shall not be operated outside of the hours, 07:00 and 00:00 (midnight)

Reason: To protect the amenity of neighbouring residents and accord with the assumptions of the submitted Noise Assessment

12. No amplified or live music shall be played in the premises outside of the following times 07:00 and 22:30.

Reason: To protect the amenity of neighbouring residents and accord with the assumptions of the submitted Noise Assessment

13. No development (including any construction, demolition, site clearance or removal of underground tanks and relic structures) approved by this planning permission, shall take place until the report of an intrusive investigation of contamination has been submitted to, and approved in writing by, the local planning authority. The report should include:
- the locations and nature of sampling points (including logs with descriptions of the materials encountered) and justification for the sampling strategy;
  - explanation and justification for the analytical strategy;
  - a revised conceptual site model; and
  - a revised assessment of the risks posed from contamination at the site to relevant receptors, including: human health, ground waters, surface waters, ecological systems and property (both existing and proposed).

All site investigations must be undertaken by a competent person and conform to current guidance and best practice, including BS8485:2015+A1:2019, BS10175:2011+A2:2017 and Land Contamination Risk Management.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

14. No development (including any construction, demolition, site clearance or removal of underground tanks and relic structures) approved by this planning permission, shall take place until a detailed remediation method statement (RMS) has been submitted to, and approved in writing by, the LPA. The RMS must include, but is not limited to:
- details of all works to be undertaken including proposed methodologies, drawings and plans, materials, specifications and site management procedures;
  - an explanation, including justification, for the selection of the proposed remediation methodology(ies);
  - proposed remediation objectives and remediation criteria; and
  - proposals for validating the remediation and, where appropriate, for future maintenance and monitoring.

The RMS must be prepared by a competent person and conform to current guidance and best practice, including BS8485:2015+A1:2019 and Land Contamination Risk Management.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and

15. Prior to any occupation or use of the approved development the RMS approved under condition 14 must be completed in its entirety. The LPA must be given two weeks written notification prior to the commencement of the remedial works.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and

16. A validation report must be submitted to and approved in writing by the LPA prior to any occupation or use of the approved development. The validation report must include, but is not limited to:
- results of sampling and monitoring carried out to demonstrate that the site remediation criteria have been met;
  - evidence that the RMS approved under condition 14 has been carried out competently, effectively and in its entirety; and
  - evidence that remediation has been effective and that, as a minimum, the site will not qualify as contaminated land as defined by Part 2A of the Environmental Protection Act 1990.

The validation report must be prepared by a competent person and conform to current guidance and best practice, including BS8485:2015+A1:2019, CIRIA C735 and Land Contamination Risk Management.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

17. In the event that contamination which has not already been identified to the Local Planning Authority (LPA) is found or suspected on the site it must be reported in writing immediately to the Local Planning Authority. Unless agreed in writing by the LPA no further development (including any construction, demolition, site clearance, removal of underground tanks and relic structures) shall take place until this condition has been complied with in its entirety.

An investigation and risk assessment must be completed in accordance with a scheme which is subject to the approval in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and conform with prevailing guidance (including BS8485:2015+A1:2019, BS 10175:2011+A2:2017 and Land Contamination Risk Management) and a written report of the findings must be produced. The written report is subject to the approval in writing of the Local Planning Authority.

Where remediation is necessary a detailed remediation method statement (RMS) must be prepared, and is subject to the approval in writing of the Local Planning Authority. The RMS must include detailed methodologies for all works to be undertaken, site management procedures, proposed remediation objectives and remediation criteria. The approved RMS must be carried out in its entirety and the Local Planning Authority must be given two weeks written notification prior to the commencement of the remedial works. Following completion of the approved remediation scheme a validation report that demonstrates the effectiveness of the remediation must be submitted to and approved in writing by the LPA.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

18. 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 (LPA).

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

19. 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 LPA. 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.

20. Within 28 days of practical completion of the last dwelling or unit, surface water drainage verification report shall be submitted to the Local Planning Authority, detailing and verifying that the surface water drainage system has been inspected and has been built and functions in accordance with the approved designs and drawings. The report shall include details of all SuDS components and piped networks in an agreed form, for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure that the surface water drainage system has been built in accordance with the approved drawings and is fit to be put into operation and to ensure that the Sustainable Drainage System has been implemented as permitted and that all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as required under s21 of the Flood and Water Management Act 2010 in order to enable the proper management of flood risk with the county of Suffolk

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/flood-risk-asset-register/>

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 LPA. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP shall include: Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include:
- Temporary drainage systems
  - Measures for managing pollution / water quality and protecting controlled waters and watercourses
  - 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 or groundwater

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/construction-surface-water-management-plan/>

22. No development shall take place within the area indicated [the whole site] until the implementation of a programme of archaeological work 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:

- a. The programme and methodology of site investigation and recording
- b. The programme for post investigation assessment
- c. Provision to be made for analysis of the site investigation and recording
- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation
- e. Provision to be made for archive deposition of the analysis and records of the site investigation
- f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.
- g. 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.

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 Strategic Priority 3 and WLP8.40 of the Waveney Local Plan (2019) and the National Planning Policy Framework (2021).

23. No building 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 22 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 Strategic Priority 3 and WLP8.40 of the Waveney Local Plan (2019) and the National Planning Policy Framework (2021).

24. No development shall take place until the applicant or developer has secured the implementation of a programme of historic building and analysis work in accordance with a written scheme of investigation which has been submitted to and approved, in writing, by the Local Planning Authority.

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 Strategic Priority 3 and WLP8.40 of the Waveney Local Plan (2019) and the National Planning Policy Framework (2021).

25. No other part of the development hereby permitted shall be occupied until the new access has been laid out and completed in all respects in accordance with drawing no. SF5046-3PD-001 B Rev B metres measured from the nearside edge of the metalled carriageway.

Thereafter it shall be retained in its approved form.

Reason: To ensure the access is laid out and completed to an acceptable design in the interests of the safety of persons using the access and users of the highway. \*This needs to be a pre-commencement condition because access for general construction traffic is not otherwise achievable safely.

26. Before the development hereby permitted is commenced a Construction Management Plan shall have been submitted to and approved in writing by the Local Planning Authority. Construction of the development shall not be carried out other than in accordance with the approved plan.

The Construction Management Plan shall include the following matters:

- a) parking and turning for vehicles of site personnel, operatives and visitors
- b) loading and unloading of plant and materials
- c) piling techniques (if applicable)
- d) storage of plant and materials
- e) provision and use of wheel washing facilities
- f) programme of site and all associated works such as utilities including details of traffic management necessary to undertake these works
- g) site working and delivery times
- h) a communications plan to inform local residents of the program of works
- i) provision of boundary hoarding and lighting
- j) details of proposed means of dust suppression
- k) details of measures to prevent mud from vehicles leaving the site during construction
- l) haul routes for construction traffic on the highway network and
- m) monitoring and review mechanisms.
- n) Details of deliveries times to the site during construction phase.

Reason: In the interest of highway safety to avoid the hazard caused by mud on the highway and to ensure minimal adverse impact on the public highway during the construction phase. This is a pre-commencement condition because an approved Construction Management Plan must be in place at the outset of the development.

27. 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 including any system to dispose of the water. 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. \*This needs to be a pre-commencement condition to avoid expensive remedial action which adversely impacts on the viability of the development if, given the limitations on areas available, a suitable scheme cannot be retrospectively designed and built. This is a pre-commencement condition because insufficient details have been submitted at planning stage.



28. The use shall not commence until the area(s) within the site shown on drawing no. 201.129.ENZ.00.XX.DR.L.00.101 PL05 for the purposes of loading, unloading, manoeuvring and parking of vehicles has / have been provided and thereafter the area(s) shall be retained, maintained and used for no other purposes.

Reason: To ensure that sufficient areas for vehicles to be parked are provided in accordance with Suffolk Guidance for Parking (2019) where on-street parking and or loading, unloading and manoeuvring would be detrimental to the safe use of the highway.

29. Before the vehicular access is first used clear visibility at a height of 0.6 metres above the carriageway level shall be provided and thereafter permanently maintained in that area between the nearside edge of the metalled carriageway and a line 4.5 metres from the nearside edge of the metalled carriageway at the centre line of the access point (X dimension) and a distance of 120 metres in each direction along the edge of the metalled carriageway from the centre of the access (Y dimension) [or tangential to the nearside edge of the metalled carriageway, whichever is the more onerous].

Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 2015 (or any Order revoking and re-enacting that Order with or without modification) no obstruction to visibility shall be erected, constructed, planted or permitted to grow over 0.6 metres high within the areas of the visibility splays.

Reason: To ensure drivers of vehicles entering the highway have sufficient visibility to manoeuvre safely including giving way to approaching users of the highway without them having to take avoiding action and to ensure drivers of vehicles on the public highway have sufficient warning of a vehicle emerging in order to take avoiding action, if necessary.

30. Before the pedestrian access is first used clear visibility at a height of 0.6 metres above the carriageway level shall be provided and thereafter permanently maintained in that area between the nearside edge of the metalled carriageway and a line from 15 metres from the nearside edge of the metalled carriageway at the centre line of the access point (X dimension) and a distance of 25 metres in each direction along the edge of the metalled carriageway from the centre of the access (Y dimension) [or tangential to the nearside edge of the metalled carriageway, whichever is the more onerous].

Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 2015 (or any Order revoking and re-enacting that Order with or without modification) no obstruction to visibility shall be erected, constructed, planted or permitted to grow over 0.6 metres high within the areas of the visibility splays.

Reason: To ensure drivers of vehicles entering the highway have sufficient visibility to manoeuvre safely including giving way to approaching users of the highway without them having to take avoiding action and to ensure drivers of vehicles on the public highway have sufficient warning of a vehicle emerging in order to take avoiding action, if necessary.

31. No part of the development shall be commenced until details of the proposed off-site highway improvements indicatively shown on Drawing No. SF5046-3PD-002 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 highway improvements are designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway safety and sustainable travel. This is a pre-commencement condition because the required details relate to off site works that need to be agreed before the development can be said to be acceptable in terms of highway capacity/safety

32. The approved static caravans shall be used for holiday/tourism accommodation only and for no other purpose unless express planning permission is granted by the Local Planning Authority (LPA). The owners/operators of the holiday units hereby permitted shall maintain an up-to-date register of all lettings, which shall include the names and addresses of all those persons occupying the units during each individual letting. The said register shall be made available at all reasonable times to the LPA.

Reason: To ensure that the development is occupied only as bona-fide holiday accommodation, delivering benefit to the rural tourism economy, in accordance with Policy WLP8.15.

33. No more than 86 caravans as defined in the Caravan Sites and Control of Development Act 1960 and the Caravan Sites Act 1968 as amended, shall be stationed on the site at any time.

The units shall only be sited on the identified for such purposes on the Site Layout (201.129.ENZ.00.XX.DR.L.00.101). For the avoidance of doubt, static caravans shall not be sited on the southern part of the application site.

Reason: To ensure that the number of caravans on site is controlled and that the open green space is retained to protect the wider character of the area

34. All hard and soft landscape works shall be carried out in accordance with the approved plans and details, as shown on 201-129-ENZ-XX-00-DR-L-45-101 PL04, 201-129-ENZ-XX-00-DR-L-45-002, 201-129-ENZ-XX-00-DR-L-45-003, 201-129-ENZ-XX-00-DR-L-45-004, and the approved Soft Landscape Schedule.

The works shall be carried out prior to the occupation of any part of the development or in accordance with the programme agreed with the Local Planning Authority; and any trees or plants which, within a period of five years from completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species unless the Local Planning Authority gives written consent to any variation; all works shall be carried out in accordance with the relevant provisions of appropriate British Standards or other recognised Codes of Good Practice.

Reason: to ensure that the appearance of the development is satisfactory

35. No development shall take place until the existing trees and hedges on site which are to be retained as detailed on approved Arboricultural Impact Assessment & Method Statement (CA21/021, dated 19 June 2022) have been protected in accordance with the measures detailed within that report. All protective measures shall be retained throughout the duration of building and engineering works in the vicinity of the tree to be protected.

Reason: For the avoidance of damage to protected trees included within the landscaping scheme in the interests of visual amenity and the character and appearance of the area.

36. Prior to the siting of any static holiday caravans on the land, a colour scheme/pallet for the external appearance of the static caravans shall be submitted to and approved in writing by the Local Planning Authority. All static holiday caravans sited on the land shall have an external appearance in accordance with the approved colour scheme/palette.

Reason: To ensure the proposal respects the character and appearance of the area.

37. Before the development is commenced details of the infrastructure to be provided for electric vehicle charging points 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 travel provision and compliance with Local Plan Sustainable Transport Policies. This needs to be a pre-commencement condition to avoid expensive remedial action which adversely impacts on the viability of the provision of electric vehicle infrastructure if a suitable scheme cannot be retrospectively designed and built.

38. Prior to the first use of the new access onto the A12, hereby approved, precise details of means and operations to restrict access onto Arbor Lane, as set out within the submitted document "Technical Note 1", and drawing SF5046-3PD-002, shall be submitted to and approved in writing by the Local Planning Authority. The existing access points along Arbor Lane shall then be restricted in accordance with the approved measures with 2 months of the first use of the new access onto the A12. The measure shall thereafter be retained and operated in accordance with those approved details.

Reason: To reduce impact on local road networks.

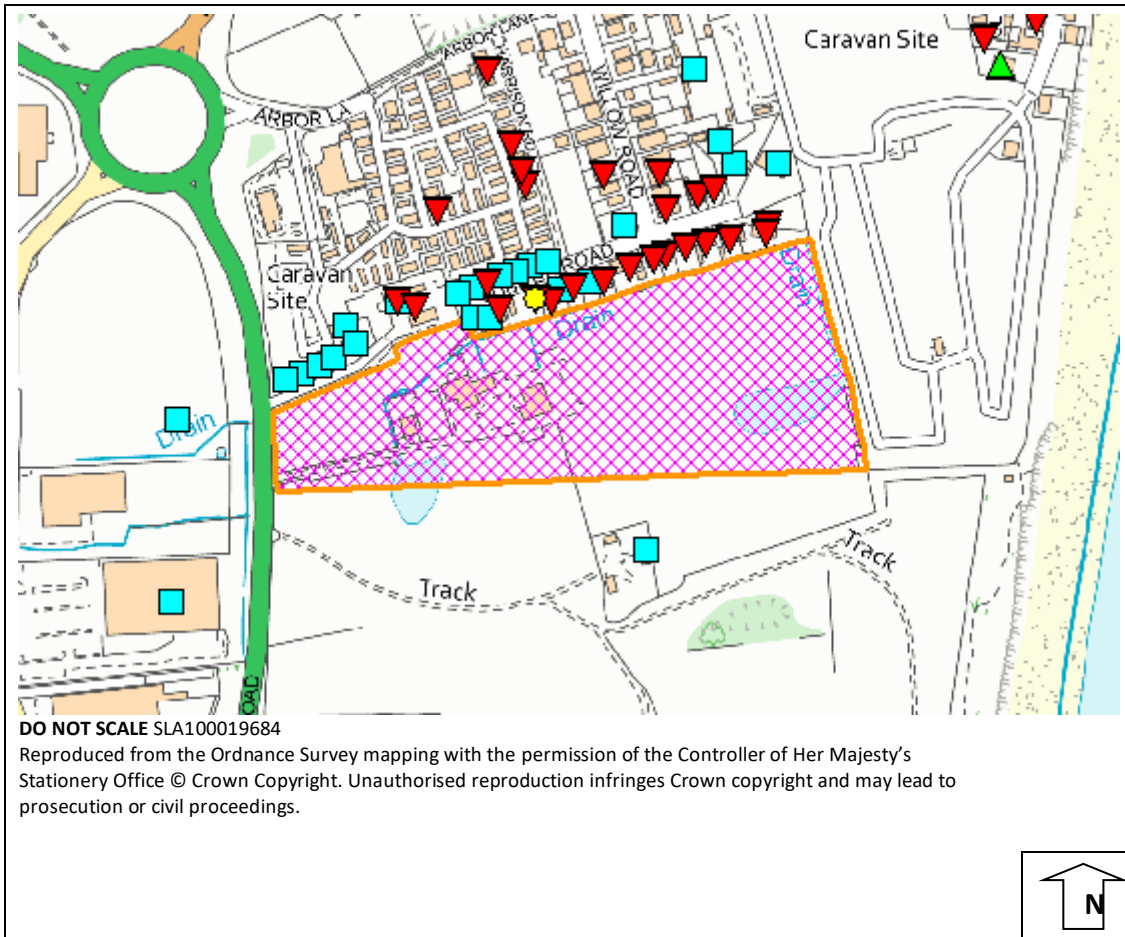
39. Prior to any demolition on the site, a repeat building inspection for bats and one emergence or dawn re-entry survey (as identified in the approved Bat Survey Assessment report (Co-ecology, September 2021)) shall be undertaken and a report detailing the results of these surveys shall be submitted to and approved in writing by the Local Planning Authority. If any mitigation or compensation measures are required as a result of these surveys, details of these shall be included within the submitted report, and works shall be undertaken in accordance with those approved details.

Reason: To ensure that ecological receptors (bats) are adequately protected and enhanced as part of the development.





## **Background information**

See application reference DC/22/2520/FUL on [Public Access](#)

# Map



## Key

-  Notified, no comments received
-  Objection
-  Representation
-  Support