

NORTH AREA PLANNING COMMITTEE – 11 June 2019

APPLICATION NO: DC/19/0920/COU

EXPIRY DATE: 1 May 2019 (extension agreed to 14 June 2019)

APPLICATION TYPE: Change of Use

APPLICANT: Park Holidays UK Ltd

LOCATION: Broadland Sands Holiday Park, Coast Road, Corton, Lowestoft

PARISH: Corton

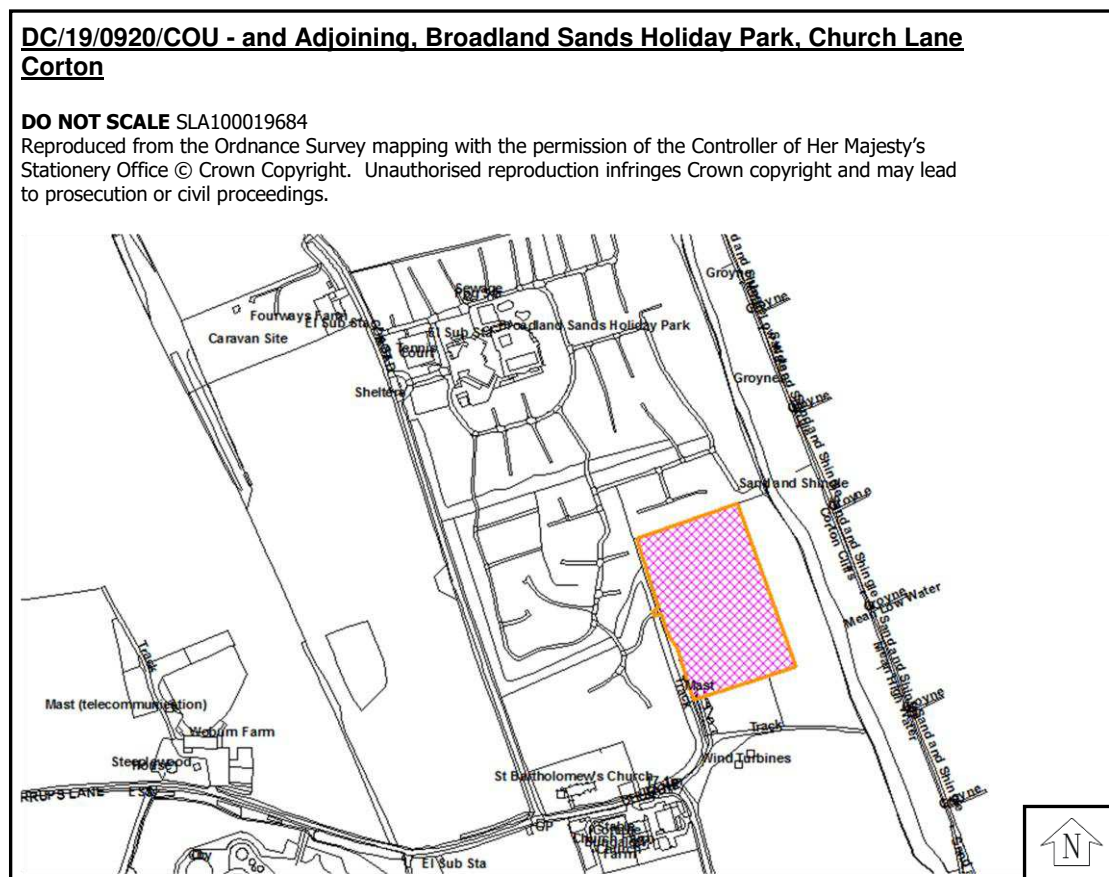
PROPOSAL: Land Adjoining, Broadland Sands Holiday Park, Church Lane, Corton

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MAP



1 EXECUTIVE SUMMARY

- 1.1 The submitted application covers two sites and seeks approval for a change of use of agricultural land to the east of St Bartholomew's church for the stationing of static caravans and lodges and as an extension to the existing facility of Broadland Sands, Corton

to allow for the repositioning of some existing vans due to coastal erosion and the installation of a small number of additional vans. The extension is considered necessary to facilitate a short term futureproofing of the business due to coastal erosion and roll-back.

- 1.2 The application is presented to members due to a previous refusal (DC/18/0813/COU) and at the request of the Head of Planning and Coastal Management on the basis of scale of the development, and for economic, tourism, business and conservation issues regarding the proximity of the Grade II* listed church and its wider setting.
- 1.3 The site has been reduced in size and the western element that raised the most concern has been removed and this application relates purely to the smaller eastern site.

2 SITE DESCRIPTION

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

3 PROPOSAL

Change of use of land for the relocation of existing vans due to coastal erosion and for the stationing of static holiday caravans and associated works and landscaping.

4 CONSULTATIONS/COMMENTS

4.1 Corton Parish Council have given time and thought to this planning application and although they do not object to the concept, they would like the following to be given due consideration:

1. The Parish Council are interested in receiving clarification from Broadland Sands, on the preferred route for vehicles travelling to the site, as there is concern at the amount of unauthorised direction signs in and around the village of Corton.
2. It is difficult to determine the public footpath, it is felt signage needs to be clear and a footpath clearly identified as it is currently blocked midway on site by a caravan plot.
3. Under no circumstances should there be any access from Church Lane leading to the Old Sewage works, this is on a sharp bend with severely restricted visibility, an entranceway at this point would be a danger to all road users.
4. Visibility on egress of Broadland Sands is limited due to the siting of caravans for sale, it is felt this causes a danger to the travelling public which would worsen with increased traffic flow.
5. The transport technical note produced within the planning documents contain a number of inaccuracies. Roads in some instances have been incorrectly identified, it mentions the A259 which is a major road in the South of England. Images are historical and do not reflect the current situation. It also mentions a speed restriction on site of 5 mph when in fact it is 10mph

Statutory Consultees

4.2 Natural England – No objection

4.3 Suffolk County Highways - The proposal for a net increase of 42 caravans located on the same side of Coast Road as the main site amenities is not sufficient to justify highway improvements, or lead to a significant impact upon the highway.

4.4 PROW -Nothing should be done to stop up or divert the Public Right of Way without following the due legal process including confirmation of any orders and the provision of any new path.

4.5 Historic England - Historic England has concerns regarding the application on heritage grounds due to the erosion of the rural setting which contributes to the significance of the grade II* church. We consider that the issues outlined in our advice need to be addressed in order for the application to meet the requirements of paragraph 192 of the NPPF.

- Further comments are awaited following further information being sent to HE as requested and members will be updated accordingly.

Non Statutory Consultees

4.5 Head of Environmental Health – No objection

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

Tourism is a key driver of economic growth (East Suffolk Economic Growth Plan) and our primary aims, as described in the East Suffolk Tourism Strategy, are to increase the volume and value of tourism, to extend the tourist season, to create compelling destinations and to link visitors more to experiences. We would be pleased to see the creation of rural employment opportunities and the generation of income into the local economy as a result.

Third Party Representations – none received

5 PUBLICITY:

Category	Publication date	Expiry	Publication
Major Application, Adjacent to Listed Building, Public Right of Way Affected,	22.03.2019	12.04.2019	Beccles & Bungay Journal
Major Application, Adjacent to Listed Building, Public Right of Way Affected,	22.03.2019	12.04.2019	Lowestoft Journal

6 SITE NOTICES

The following site notices have been displayed: General Site Notice

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

7 PLANNING POLICY

7.1 Section 38(6) of the Planning and Compensation Act 1990

7.2 The National Planning Policy Framework (2019) and National Planning Policy Guidance (NPPG) forms a material consideration in the determination of this application.

7.3 Planning (Listed Buildings and Conservation Areas) Act 1990, Part II

7.4 East Suffolk (Waveney) Local Plan 2019

- WLP8.15 – New Self Catering Tourist Accommodation
- WLP8.17 – Existing Tourist Accommodation
- WLP8.25 – Coastal Change Management Area
- WLP8.26 – Relocation and Replacement of Development Affected by Coastal Erosion
- WLP8.29 – Design
- WLP8.40 – Archaeology

8 PLANNING CONSIDERATIONS

Principle

- 8.1 The primary issue to be considered is that of principle of development. The site is located outside of any physical limits and is within the open countryside and is also immediately adjacent to the Grade II* listed St Bartholomew's Church. As such the setting of the listed building is a matter of concern, however this also needs to be weighed against the employment, economic and tourism benefits that the extension would bring, and assessed against the potential loss of existing space due to coastal erosion, which would have an impact on existing employment, economic and tourism principles.
- 8.2 The National Planning Policy Framework is generally supportive of tourism and states that local plans should support sustainable rural tourism which benefits the rural economy whilst respecting the character of the countryside. The East Marine Plan recognises the importance of tourism in coast areas and seeks to support tourism proposals and minimise harm resulting from development on tourism.
- 8.3 With regards to policy, the proposal is related to a nearby tourist enterprise and goes some way to serving the needs of a rural enterprise; therefore planning policy could allow for such a development. The development as submitted does not increase the risk of coastal erosion or risk to property and includes screening measures to integrate the development into the landscape.
- 8.4 Consideration of rollback has also been included in the application which accords with para 5.20-5.22 of the Coastal Change SPD, which specifically relates to caravan sites. Notwithstanding this however assurance has been received that the caravans located in the 'Eastern Site' are movable in the case that rollback is required due to coastal erosion and this element has been agreed with Coastal Management officers who have been involved with lengthy discussions with Park Holidays. As such officers are of the opinion that the proposed development is broadly acceptable in principle and satisfies the provisions of policies WLP8.25 – Coastal Change Management Area and WLP8.26 – Relocation and Replacement of Development Affected by Coastal Erosion of the adopted East Suffolk (Waveney) Local Plan 2019.

Setting of listed building, landscape and heritage impacts

- 8.5 Following the primary issues relating to principle there are concerns surrounding the setting of the Grade II* listed church and officers, along with the agent and applicant have carried out numerous site visits and discussions with Historic England, and they are satisfied with the less than substantial impact generated by the smaller extension due to

existing topography and planting, however they have asked for some additional information and photo montages and these have been supplied. At the time of writing this report no response has been received, and members will be updated accordingly.

- 8.6 Nonetheless and notwithstanding the above further consideration is required of the National Planning Policy Framework (2018) and Paragraph 189 states that In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a result of this a heritage assessment was submitted and the scheme has been designed to try to reduce the impact of the development on the heritage asset insofar as possible, which includes a significant hedge planting and landscaping and whilst there will be some impact to the setting of the listed building this is less than substantial in this instance.
- 8.7 Furthermore paragraph 190 states that Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal and when considering the impact of a proposal on a heritage asset, it should seek to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal. As already stated the church has been identified as a designated heritage asset and that this has been taken into consideration within the scheme and therefore these requirements have been fulfilled.
- 8.8 Notwithstanding the above paragraphs 193 and 194 state that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance and that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Officers have considered the impact of the development along with comments received from Historic England and discussions have been undertaken whereupon the general consensus was that the eastern extension, although having an enclosing effect, would be less than substantial given the lack of visibility of the church from this area. The former public coastal path has been lost to coastal erosion and the church is not visible from the beach and planting measures would not have a significant impact on the overall setting. Indeed the Council's Conservation officer has commented as follows:
- "I am of the view that this proposal causes some harm, to the significance of the Grade II* Listed Church of St. Bartholomew's by negative impact on its setting by the development of the open/agricultural land. This is considered to be less than substantial harm (as set out in clause 196 of NPPF). This harm, I consider, being of a medium/low level and is not of a level where I would recommend refusal. It is up to the planning Officer to weigh this harm against the Public benefit when coming to a decision".*
- 8.9 Finally the Councils Arboricultural and Landscape Manager and considered the comprehensive Landscape Visual Impact Assessment (LVIA) and has submitted

comprehensive comments which have been précised below (full comments are available on the council website):

“Apart from the seaward aspect, I do not consider that there will be significantly adverse visual impacts arising, post maturing of new planting and successful retention and management of existing boundary trees and hedges. Views from the coast path will remain unscreened and I consider these to be moderately adverse. However, overall I do not consider that there are reasonable grounds for objection on grounds of adverse landscape and visual impact”.

- 8.10 As such officers are satisfied that the harms identified to the setting of the listed building would be less than substantial in this particular instance and therefore the proposed development accords with local plan policy WLP8.37 – Historic Environment.

Coastal Erosion

- 8.11 The site is located within the Coastal Erosion Vulnerability Area and, as such, long-term plans have indicated that there will be a loss of land that will impact upon the operation of the site and place its future at risk. In order to future proof the park there needs to be an established roll-back programme in place. This issue has been discussed at length with the Coastal Management Team who are supportive of the proposed park extension and movement/ relocation of existing caravans and their comments are outlined in paragraph 4.6 above. However they have requested a condition be added should members be minded to approve the application.
- 8.12 There is a slight increase in numbers of vans on the site with 60 pitches in total being accommodated, 38 of which are for existing vans that need to be moved as has been agreed with Coastal Management along with an additional 22 pitches. Again this additional number has been agreed with Coastal Management who considers the slight increase in numbers acceptable.
- 8.13 Furthermore Coastal Management have commented that the revised CEVA ref SHF.201.087.HY.02.A dated March 2019 has addressed the matters noted in the original comments and is accepted as a very comprehensive and objective assessment of coastal change. Recommend a condition requiring the developer to prepare and implement an Erosion Monitoring/Response Plan that identifies triggers for timely caravan removal and decommissioning/removal of infrastructure that includes a margin of safety

Economy and employment

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

2017 according to the Economic Impact of Tourism report and tourism is a key driver of economic growth (East Suffolk Economic Growth Plan) and one of the council's primary aims, as described in the East Suffolk Tourism Strategy, with the aspiration to increase the volume and value of tourism, to extend the tourist season, to create compelling destinations and to link visitors more to experiences and the economic and regeneration team have stated that they would be pleased to see the creation of rural employment opportunities and the generation of income into the local economy as a result of this proposed development.

- 8.16 Tourism data gathered by the United Kingdom Tourism Survey (UKTS) indicates that the parks industry accounts for nearly 90 million tourist bed nights which represents approximately 22% of the UK total. This introduces a spend in excess of £3 billion per annum (approximately 14% of the UK total). The park - as developed with 535 holiday caravans - contributes in the order of £8.8 to £13.8m per annum into the local economy. This amount would have a marginal increase with the additional 22 vans proposed but it would have some impact by way of approximate spend to the local economy of around £6500 per week in total which would work out to an estimated additional £350,000 per year or thereabouts (this is based on pure spend in the local economy and is based on figures supplied from Visit Britain and does not include employment increases)

Highways

- 8.17 With regards to highways there will of course be some limited impacts due to the potential increase in traffic created by the additional 22 vans however all identified highways issues have been addressed to the satisfaction of SCC Highways officers authorities and a number of conditions have been requested.
- 8.18 Corton Parish Council have raised concerns with regards to highways however in the absence of objections, and SCC highways officers confirming they are satisfied, then a refusal in highways grounds would be difficult to substantiate.

9 CONCLUSION

- 9.1 Whilst this application is relatively finely balanced given the potential impact of the development relating to the issues with the wider setting of the listed building, this needs to be considered against the potential investment in coastal improvements, coastal roll-back and the benefits that the park extension would bring to tourism, employment and the local economy and the cost implications on the district if this income were lost.
- 9.2 Given the above members are asked to consider whether the potential economic impacts, employment opportunities and improved transport proposals along with landscaping enhancements are sufficient to outweigh the harms identified to the setting of the listed building.
- 9.3 However officers consider that the reduced proposal complies with local planning policy, and the NPPF in terms of harm and setting, and that the economic and employment benefits would outweigh any remaining limited harms to the overall landscape, particularly given the level of landscaping and the relation of the site to the church which would be less than substantial. Furthermore the site would ensure the safe relocation of existing caravans and the additional number will not have a significant impact on the Coastal

Erosion Zone and has been agreed with Coastal Management as a suitable short to medium terms solution.

10 RECOMMENDATION

10.1 Approve subject to the following conditions:

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

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

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

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

3. The use shall not commence until the area(s) within the site shown on Drawing No. SHF.201.087.LA.D.00.001 for the purposes of [LOADING, UNLOADING,] manoeuvring and parking of vehicles has been provided and thereafter that area(s) shall be retained and used for no other purposes.

Reason: To ensure that sufficient space for the on site parking of vehicles is provided and maintained in order to ensure the provision of adequate on-site space for the parking and manoeuvring of vehicles where on-street parking and manoeuvring would be detrimental to highway safety to users of the highway.

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

Reason: To encourage sustainable travel by providing secure covered cycle storage.

Note: Suffolk Guidance for Parking (2015) recommends 1 stand per 5 pitches.

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

The site operator shall maintain a register of complaints and record of actions taken to deal with such complaints at the site office as specified in the Plan throughout the period of occupation of the site.

Reason: To reduce and / or remove as far as is reasonably possible the effects of HGV Movements.

6. The alignment, width, and condition of Public Rights of Way providing for their safe and convenient use shall remain unaffected by the development unless otherwise agreed in writing by the Rights of Way & Access Team; any damage resulting from these works must be made good by the applicant.

Reason: To ensure the Public Right of Way is maintained and any damage rectified to the satisfaction of Suffolk County Council Rights of Way & Access Team

7. Prior to the first occupation of the site the applicant shall prepare and implement an Erosion Monitoring/Response Plan that identifies triggers for timely caravan removal and de-commissioning / removal of infrastructure that includes a margin of safety. It is recommended that the safety margin takes account of information in the CEVA that a cliff retreat of 8m in one year is possible as a consequence of an exceptional weather event.

Reason: To ensure that resilience measures are in place in the event of extreme weather events and to ensure the safety of occupants.

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

- i. The programme and methodology of site investigation and recording
- ii. The programme for post investigation assessment
- iii. Provision to be made for analysis of the site investigation and recording
- iv. Provision to be made for publication and dissemination of the analysis and records of the site investigation
- v. Provision to be made for archive deposition of the analysis and records of the site investigation
- vi. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.
- vii. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

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

REASON: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Policy WLP8.40 – Archaeology of the adopted East Suffolk (Waveney) Local Plan 2019 and the National Planning Policy Framework (2018).

Informatives:

The Local Planning Authority has assessed the proposal against all material considerations including planning policies and any comments that may have been received. The planning application has been approved in accordance with the objectives of the National Planning Policy Framework and local plan to promote the delivery of sustainable development and to approach decision taking in a positive way.

Under Section 167 of the Highways Act 1980 any structural retaining wall within 3.66 metres of the Public Right of Way with a retained height in excess of 1.37 metres must not be constructed without the prior approval of drawings & specifications by Suffolk County Council. The process to be followed to gain approval will depend on the nature and complexity of the proposals. Applicants are strongly encouraged to discuss preliminary proposals at an early stage, such that the likely acceptability of any proposals can be determined, and the process to be followed can be clarified.

Construction of any retaining wall or structure that supports the Public Right of Way or is likely to affect the stability of the right of way may also need prior approval at the discretion of Suffolk County Council.

If the Public Right of Way is temporarily affected by works which will require it to be closed, a Traffic Regulation Order will need to be sought from Suffolk County Council.

BACKGROUND INFORMATION: See application ref: DC/19/0920/COU
at www.eastsuffolk.gov.uk/public-access