



## Committee Report

**Planning Committee North - 14 December 2021**

**Application no DC/19/2949/COU**

**Location**

Land Adjoining Broadland Sands  
Holiday Park  
Coast Road  
Corton  
NR32 5LG

**Expiry date** 18 September 2019

**Application type** Change of Use

**Applicant** Park Holidays UK Ltd

**Parish** Corton

**Proposal** Use of land for the stationing of static holiday caravans, construction of footway/cycle way, church parking area and associated works

**Case Officer** Joe Blackmore  
07887 454208  
[Joe.Blackmore@eastsoffolk.gov.uk](mailto:Joe.Blackmore@eastsoffolk.gov.uk)

### 1. Summary

- 1.1 This application seeks planning permission to extend the Holiday Park at Broadland Sands across a parcel of land to the west of the existing park. The scheme has been significantly amended, and reduced in scale, compared to a previous application (DC/18/0813/COU) that was refused by the former Waveney District Council Planning Committee.
- 1.2 The proposed development will allow Broadlands Sands Holiday Park to expand in the short-to-medium term but, longer term, enable The Park operation to be strategically moved away from the eroding coastline ensuring that the use can viably continue as an important tourism use with associated economic benefits.
- 1.3 The proposed scheme is now considered to be acceptable in terms of the impact on the significance of the Grade II\* Church, and the significant provision of green open space within the site is a welcome part of the amended layout because it will ensure the setting of the Church is preserved, whilst also offering valuable recreation/amenity space for visitors to

The Park. The provision of a car park for The Church is a minor but welcome benefit of the scheme.

- 1.4 In terms of highways safety matters, there are significant off-site works that will be required (as recommended by statutory consultees) but, with the appropriate conditions, this scheme will be acceptable in highways safety terms.
- 1.5 This revised application is considered to satisfactorily address the reasons the previous application was refused. The scheme accords with the Development Plan and there are no material considerations that would indicate for a decision other than approval. Officers are therefore seeking authority to approve the application subject to the necessary conditions/obligations, and subject to undertaking an Appropriate Assessment under the Conservation of Habitats and Species Regulations (2017) and reaching a conclusion of 'no likely significant effects'.
- 1.6 As this revised application follows on from a Planning Committee decision to refuse the previous scheme, the application has been referred direct to Planning Committee (North) for consideration.

## **2. Site description**

- 2.1 Broadland Sands Holiday Park ("The Park") is an existing caravan park of some 13.5 hectares located to the north of Corton and south of Hopton. The Park is accessed from the west via the Coast Road. To the east of The Park are the cliffs and Corton Beach.
- 2.2 The application site, known as 'Steeple Field' is a broadly rectangular parcel of land located to the western side of the Coast Road, and bound on its southern edge by Stirrup's Lane. The western side is bound by a dismantled railway line, and beyond that is countryside extending out to the A47 (Yarmouth Road). To the north of the site is a separate small touring caravan park in separate ownership. The site is flat, open arable land, bordered in part by trees and hedgerows.
- 2.3 The site lies to the west and within the setting of the Church of St. Bartholomew which is listed grade II\*.
- 2.4 Land to the east of the site, adjacent the Cliffs and extending east into Corton Beach, is all within an area subject of coastal erosion/change; this area is identified in the Local Plan as a coastal change management area (CCMA).
- 2.5 The site is wholly within the East Suffolk District, albeit at the very northern end of the District. Therefore, the neighbouring authorities and Parish Council have been formally consulted on this application.
- 2.6 Relevant Planning History for Broadland Sands Holiday Park
  - DC/18/0813/COU - *Change of use of land for the stationing of static holiday caravans, construction of footway/cycleway, church parking area and associated works.* Refused 21 December 2018.

- DC/18/3277/FUL - *Erection of New Swimming Pool Complex (D2/A5), Childrens Playground, Crazy Golf Course, Climbing Wall, Archery/Activity Space, Decking link to Existing Clubhouse and Associated Facilities.* Approved 04 October 2018.
  - DC/19/0920/COU - *Use of land for the stationing of static holiday caravans and associated works.* Approved 12 June 2019.
  - DC/21/4007/FUL - *Construction of new single storey rear extension to the existing clubhouse, new external timber pergola and associated landscaping.* Approved 15 October 2021.
- 2.7 The recent planning history indicates significant investment in The Park by the operator, Park Holidays UK Ltd. The key application from the site history is DC/18/0813/COU (hereafter referred to as “the previous application”); that application was refused by the former Waveney District Council Planning Committee, and a copy of the decision notice is appended to this report (see appendix 1), along with the minutes of that meeting (see appendix 2).

### **3. Proposal**

- 3.1 This application seeks full planning permission for the use of the land for the stationing of static holiday caravans, along with associated works including the construction of a footway/cycle way; car park for the Church; means of vehicular access; and other associated works.
- 3.2 The illustrative site layout plan indicates that the scheme would include up to 159 pitches. The final layout would be subject to the usual model standards caravan site licence requirements. All caravans would be sited on a concrete pad set at local ground level and connected to services in the usual way. No amenity buildings would be required, and visitors would utilise the facilities at the existing park.
- 3.3 The 159 pitches would be for Caravans that meet the relevant definition of a caravan set out in the Caravan Sites & Control of Development Act 1960 and the Caravan Sites Act 1968.
- 3.4 The site area is some 10 hectares and approximately 4.3 hectares of that (the southern half of the site) is proposed as open greenspace. The northern half of the site (approximately) is the location where Caravans would be sited.
- 3.5 This scheme is significantly reduced from that proposed in the previous application. The previous scheme saw Caravans sited across, essentially, the whole of the application site, which (subject to site licensing requirements) would have been potentially 250+ Caravans. This application therefore makes significant amendments/reductions to the scale of development in response to the refusal of the previous application.
- 3.6 Vehicle access to the site would be from Coast Road, directly opposite the existing vehicle access to The Park. In the south-eastern corner of the site a new car park for Church is proposed. Running north-to-south through the site, adjacent the highway, a footpath is proposed that would connect to the south-western corner of the site, potentially linking in to existing public rights of way.

3.7 A scheme of hard and soft landscape works is set out within the supporting documents

3.8 Within the updated Transport Assessment a series of off-site highways works are proposed; these will be detailed and considered in the highways/sustainable transport section of this report.

#### 4. Consultations/comments

4.1 17 neighbouring properties/local residents were consulted. Three representations of objection were received raising the following key concerns (inter alia):

- Increase in traffic that would be caused and the safety of individuals walking and cycling in this area.
- A public road through the middle of a holiday park, with a large number of children on site, is far from ideal, especially when it appears that facilities will be on one side of the road only.
- The siting of the Church car park entrance on a corner is not acceptable.
- Despite works to encourage traffic away from the A47/Stirrups Lane, the routes through the village will still be preferred.
- Local roads are unsuitable for current traffic levels, additional development will worsen that.
- There needs to be a strategic review of the A47.
- The area needs cycle/walkways between Gorleston and Lowestoft.
- This scheme would see the loss of primate, Grade 1 Agricultural land.
- The site is not allocated for development in the Local Plan.
- A new caravan site in the area is not needed. As adequate holiday accommodation already exists.
- Holiday accommodation should not expand to the west side of the Coast Road.

4.2 A letter of objection has been submitted by a group claimed to be 'Broadland Sands Owners'; it is not known if that is genuine or not. In any case, the material planning issues raised in that letter include:

- The current facilities and entertainment complex at the park is insufficient.
- The new swimming pool has not been built in accordance with DC/18/3277/FUL.
- The scheme presents a danger to vehicles on the narrow country lanes, along with pedestrians on these roads with no footways.

#### 4.3 Responses to Initial Round of Consultation (2019)

Consultee	Date consulted	Date reply received
Hopton on Sea Parish Council	25 June 2019	12 August 2019
Summary of comments: <i>Hello to Waveney Planning</i>  <i>This is Hopton on Sea Parish Council wishing to make a comment regarding the above application,</i>		

*which directly affects Hopton. We have been unable to comment via your portal as our postcode is not recognised, being in Norfolk.*

*The proposed route for traffic is via Longfullans Lane, Hopton-on-Sea, Norfolk. Longfullans Lane is a very narrow single track lane, with passing places. It is the national speed limit.*

*It is proposed that traffic for Broadland Sands uses Longfullans Lane. Traffic would first have to come into Hopton off the main A47, turning right onto Lowestoft Road and then up Longfullans Lane which exits opposite Potters Leisure Resort, turning right into Coast Road to Corton. The substantial traffic heading for Potters is already directed along this narrow route, including coaches and there have been many near-misses reported to the Parish Council. The volume of traffic would increase yet again with the influx of holidaymakers to Broadland Sands, making this narrow Lane a safety issue.*

*Whilst the application refers to additional passing places being made prior to any other work commencing at Broadland Sands, what this Lane needs is to be widened along the entire length. In addition some existing road signs are now obscured by overgrown vegetation and if this is to be the main access for Broadland Sands traffic, the Lane would need to be maintained on a more regular basis.*

*Can this road be made 30mph rather than the national speed limit, which would encourage safer driving.*

Consultee	Date consulted	Date reply received
Corton Parish Council	26 July 2019	12 August 2019

*Application DC/19/2949/COU – Broadland Sands Holiday Park*

*Following a recent Parish Council meeting we wish to make it clear that Corton Parish Council and the residents of Corton strongly, object to this planning application.*

*We are disappointed that it is only some 6 months since a similar application was declined and we fail to understand what has materially changed since then.*

*Broadland Sands, allegedly, want space to relocate caravans as the cliff erodes but it seems that they are adding to their existing caravan base. As far as we are aware there has been very little erosion in this area recently but if there is, in the future, where will the caravans go, as the new space will be filled with new caravans. A separate application was agreed only recently to add 62 caravans, 20 of which were relocations from the cliff, this new application would take the number to over 200.*

*The concern now is where will the caravans that need relocating, due to coastal erosion in the future, be located?*

*Our continued observations are as follows:-*

*Whilst Broadland Sands have commented there will be a crossing point at the main entrance with an additional 159 units sited on the west side of the Coast Road there is no guarantee residents would use this route.*

*The road is extremely dangerous, narrow and is used by a number of different types of vehicle including HGVs, buses, cars, etc.*

*Corton is becoming a very busy cut through to Lowestoft so more caravans, etc would only increase these numbers as it would be easier to come through our village rather than proceed northward,*

along the A47, towards Hopton.

There is no pavement, along the Coast Road, we already see holiday makers in the road walking towards both Corton and Hopton, which is a concern for public safety.

Broadland Sands main entertainment complex is on the east side of the Coast Road so the additional holiday makers would be crossing this road at all times of the day and night.

Broadland Sands have suggested putting a pedestrian crossing outside their entrance and reducing the speed limit from 60 to 30 mph, to address this problem. How will this be enforced and where will the restrictions start and finish? The road is historically fast, so traffic will not slow down immediately.

We already suffer with speeding traffic through our village where in a 30mph zone we regularly see vehicles travelling in excess of 60, 75 and even 80, as recorded on a number of occasions in July.

There are no plans to widen roads to Broadland Sands, it is suggested that the central access point on the A47 from Stirrups Lane be closed, as this is a dangerous junction.

However this would only encourage traffic from the south to come through Corton adding to the increasing traffic problems we see. The speed sign in Corton Long Lane recorded some 104,000 vehicles heading into Corton, from the A47, in July. Broadland Sands claim only part of the day is impacted by their holiday makers but we see holiday traffic throughout the day moving backwards and forwards from Lowestoft town, Tesco and other local shopping facilities.

An increasing number of caravans being erected in the area is spoiling the natural beauty. With the proposed new Lowestoft Garden Village only a stones throw away from this new site we are already facing an additional 1400 homes being added to the area and will need to face the impact of this over the next few years.

Corton Parish Council

Consultee	Date consulted	Date reply received
Norfolk County Council	2 September 2019	2 September 2019
Summary of comments: No objection subject to conditions.		

Consultee	Date consulted	Date reply received
Highways England	18 October 2019	18 October 2019
Summary of comments: No objection subject to conditions.		

Consultee	Date consulted	Date reply received
Highways England	26 July 2019	8 August 2019
Summary of comments: Recommend planning permission not be granted as further assessment is required (see further comments above).		

Consultee	Date consulted	Date reply received
SCC Flooding Authority	26 July 2019	14 August 2019
Summary of comments: No objection subject to conditions.		

Consultee	Date consulted	Date reply received
Historic England	26 July 2019	15 August 2019
Summary of comments: Historic England has no objection to the application on heritage grounds subject to any grant of consent securing the implementation and maintenance of appropriate landscaping .		

Consultee	Date consulted	Date reply received
SCC Highways Department	26 July 2019	1 August 2019
Summary of comments: Holding objection until Transport Assessment has been submitted.		

Consultee	Date consulted	Date reply received
Sustrans (East Of England)	31 July 2019	No response
Summary of comments: No response received.		

Consultee	Date consulted	Date reply received
East Suffolk Head Of Coastal Management	14 August 2019	14 August 2019
Summary of comments:  The site of this application is far inland of the Coastal Change Management Area (CCMA). It is not at risk from coastal erosion within 100 years therefore no Erosion Risk Assessment is required. However the development site is an ancillary development to a parent site that is based within the CCMA therefore there is a potential risk to the viability of the wider combined development sites from erosion affecting the part closer to the sea within the CCMA. CPE staff have been in consultation with the owners of the parent site on a number of projects in recent years, including potential private coastal management works that may reduce erosion risk to the site and are comfortable that the site owner is aware of the risks to the investment posed by coastal erosion. For these reasons no further information on coastal erosion risk is required from the developer.		

Consultee	Date consulted	Date reply received
ESC Environmental Health	26 July 2019	9 August 2019
Summary of comments: No objections.		

Consultee	Date consulted	Date reply received
SCC County Archaeological Unit	26 July 2019	19 August 2019
Summary of comments: No objection subject to conditions.		

Consultee	Date consulted	Date reply received
Great Yarmouth Borough Council	26 July 2019	15 August 2019
<p>Summary of comments:</p> <p>Strategic Planning welcome being consulted on application DC/19/2949/COU and would make the following comments in regard to the application:</p> <ul style="list-style-type: none"> <li>• The infrastructure section of the local plan for the Waveney part of East Suffolk supports a pedestrian and cycle path between Hopton and Corton.</li> <li>• The scheme could be enhanced by improved connectivity through the west part of the site along the former railway tracks in conjunction with the North Lowestoft Garden Village allocation. A new cycle route towards Hopton-on-Sea and be in accordance with both the Waveney Local Plan and the emerging local plan for Great Yarmouth Borough.</li> <li>• The widening of Longfulans lane as proposed in the submitted Transport Assessment is supported through emerging draft HP1-dp. Norfolk and Norfolk County Council would be the local highway authority regarding this road.</li> </ul> <p>These aims are supported by:</p> <ul style="list-style-type: none"> <li>• Policy CS16 of the Great Yarmouth Borough Council Core Strategy stating an intention to improve linkages between existing 'green travel' routes.</li> <li>• Emerging Policies in the Local Plan Part 2 for Great Yarmouth Borough Council; I2-dp which seeks the use of former railway tracks to be safeguarded for development for cycleways/ footpaths. I3-dp which seeks a Gorleston to Lowestoft cycle route which "endeavours will be made to liaise with East Suffolk Council to bring forward improved provision from Hopton southwards to Corton and Lowestoft."</li> </ul>		

Consultee	Date consulted	Date reply received
SCC Rights Of Way	26 July 2019	14 August 2019

Summary of comments:

No objections, detailed comments include:

*The proposed development site does not contain any public rights of way, although Corton public footpath 4 runs southwards of the proposed development site. In addition, Corton public footpath 6 runs through the existing caravan site and Corton public bridleway 5 runs to the south of the existing site linking to the coast.*

*The plans depict a footpath/cycleway parallel to Coast Road and we would like clarification if this is available for public use. We would like to see this footpath/cycleway connecting at the southern end with Corton public footpath 4 that runs on the east side of the water treatment works linking Stirrups Lane with Corton centre and providing a walking route that avoids Church Lane.*

Consultee	Date consulted	Date reply received
East Suffolk Design And Conservation	26 July 2019	3 September 2019

Summary of comments:

Comments included within report

Consultee	Date consulted	Date reply received
Natural England	26 July 2019	5 August 2019

Summary of comments:

No objections.

Consultee	Date consulted	Date reply received
Mr Nick Newton (ESC Arboriculture and Landscape)	26 July 2019	12 August 2019

Summary of comments:

Comments included within report.

Consultee	Date consulted	Date reply received
Environment Agency - Drainage	26 July 2019	No response

Summary of comments:

No response received.

Consultee	Date consulted	Date reply received
Suffolk Wildlife Trust	26 July 2019	No response
Summary of comments: No response received.		

Consultee	Date consulted	Date reply received
ESC Environmental Health - Noise	26 July 2019	No response
Summary of comments: No response received.		

Consultee	Date consulted	Date reply received
Private Sector Housing (Internal)	26 July 2019	3 October 2019
Summary of comments: No comments to make in respect of this application.		

Consultee	Date consulted	Date reply received
Economic Regeneration (Internal)	26 July 2019	8 August 2019
Summary of comments: <i>We would be supportive of any new tourism accommodation proposals that would strengthen the visitor economy in East Suffolk and enhance the diversity of the current offer, whether by means of conversion or new build. Self-catering accommodation was worth £12.4 million to the economy of East Suffolk in 2017 according to the Economic Impact of Tourism report. Tourism is a key driver of economic growth (seen in the 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.</i>		

Consultee	Date consulted	Date reply received
Suffolk Preservation Society	26 July 2019	No response
Summary of comments: No response received		

#### 4.4 Responses to Re-Consultation Undertaken in 2021

Consultee	Date consulted	Date reply received
SCC Highways Department	12 November 2021	
Summary of comments: Awaiting final comments from SCC Highways to confirm their recommended conditions.		

Consultee	Date consulted	Date reply received
SCC Highways Department	25 June 2021	30 June 2021
Summary of comments: <i>In order to overcome the objection raised in our last highways response (dated 16/08/19), an amended plan showing the correct location for the new church car park access needs to be submitted, otherwise we would be accepting the plans showing it on the bend. Everything else we are happy to cover by planning condition.</i>		

Consultee	Date consulted	Date reply received
Norfolk County Council	25 June 2021	No response
Summary of comments: See previous comments that withdraw holding objection subject to conditions/informatives.		

Consultee	Date consulted	Date reply received
Highways England	25 June 2021	15 July 2021
Summary of comments: Recommend that conditions should be attached to any planning permission that may be granted.		

Consultee	Date consulted	Date reply received
East Suffolk Ecology	N/A	1 June 2021
Summary of comments: <i>RAMS and holiday uses are a slightly grey area as the evidence which underpins RAMS is based on the increase in residential units. However we do apply it to new tourist accommodation where they will be equivalent to residential unit (e.g. available all year round, a more permanent structure – so not tents or touring caravans), so we would normally apply it to static caravans. The only thing I do note from the planning statement for this application is that it says that the existing park is subject to coastal erosion and units are being moved away from the cliff, is the intention then that these</i>		

*'new' pitches replace ones that are being lost from the existing park? If that is the case then we couldn't seek a RAMS contribution as they can be considered replacement units.*

*I think the open space proposed on site is probably ok, as it is a reasonable size and has links to the existing wider rights of way network.*

4.5 No further comments from either Parish Council were received in response to the re-consultation undertaken in 2021.

## 5. Publicity

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

<b>Category</b>	<b>Published</b>	<b>Expiry</b>	<b>Publication</b>
Major Application	2 August 2019	23 August 2019	Beccles and Bungay Journal

<b>Category</b>	<b>Published</b>	<b>Expiry</b>	<b>Publication</b>
Affects Setting of Listed Building	2 August 2019	23 August 2019	Lowestoft Journal

## 6. Site notices

General Site Notice	Reason for site notice: Major Application; Affects Setting of Listed Building. Date posted: 5 August 2019 Expiry date: 27 August 2019
---------------------	---

## 7. Planning policy

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

WLP1.2 - Settlement Boundaries (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)

WLP8.17 - Existing Tourist Accommodation (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.21 - Sustainable Transport (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)

WLP8.26 - Relocation and Replacement of Development Affected by Coastal Erosion (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 Corton).
- 8.3 The NPPF was updated in 2021 and is 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 preamble to policy WLP8.15 sets out the importance of self-catering tourist accommodation to the Waveney Local Plan area's tourism sector. The policy is broadly supportive of small scale uses; requires medium sized sites to be well related to the A or B road network and public transport; and that larger developments of 80 units and above must:

*"be located in or close to Lowestoft, one of the market towns, or one of the coastal resorts of Corton, Kessingland or Southwold. They will need to demonstrate good connectivity with other tourist destinations and amenities, particularly by public transport, walking and cycling. A Transport Assessment must be provided for sites of this scale. Large developments should also provide on site commercial, recreational or entertainment facilities to serve day-to-day needs of tourists."*

- 8.6 The detail of the Policy can be found at the link:

<https://eastsuffolk.inconsult.uk/consult.ti/eastsuffolkwaveneylocalplan/viewCompoundDoc?docid=11491476&partid=11512564#11512564>

- 8.7 The application site is located adjacent to the existing Broadland Sands Holiday Park, and will utilise all of its existing facilities and services. For a larger scale tourism development, it is preferentially located in the coastal resort of Corton and will expand an existing site, rather than creating a whole new Holiday Park.
- 8.8 The principle of the development is therefore entirely supported by the Local Plan spatial strategy and specifics of WLP8.15.

#### Heritage Considerations

- 8.9 The Planning (Listed Buildings and Conservation Areas) Act 1990 ("The Act") sets out, in section 66, the statutory duty of decision-takers in respect of listed buildings:

*"In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."*

- 8.10 This statutory requirement is reflected in the objectives of Local Plan policy WLP8.37 and also chapter 16 of the NPPF which sets out (inter alia):

- That heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance (para. 189);
- That applicants should describe the significance of any heritage assets affected, including any contribution made by their setting (para. 194);
- That great weight should be given to the conservation of heritage asset's and, the more significant the asset, the greater the weight should be (para. 199);
- That any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification; and
- That where harm would arise, it must be properly weighed against the public benefits of the development (paras. 201 & 202).

- 8.11 The applicant has provided a Heritage Assessment (HA) that meets the requirements of NPPF paragraph 194. In considering heritage matters, Officers have had regard to East Suffolk Council's Historic Environment SPD (adopted June 2021).
- 8.12 The application proposes the change of use of the land for stationing of static holiday caravans, the construction of a footway/cycle way, church parking and associated works to extend the existing Broadland Sands Holiday Park. The site lies to the west and within the setting of the Church of St. Bartholomew which is listed grade II\*.
- 8.13 The church dates from the fourteenth and fifteenth centuries but had fallen into ruination by the seventeenth century and was then subsequently partially restored. It lies outside the village to the north in a rural setting. It forms an isolated group with Church Farm on the opposite side of the road. In this open, flat landscape close to the coast the church tower forms a landmark. The rural setting allows views to the church, enhances its role as a landmark, and provides an attractive setting for the building.
- 8.14 The current proposal is to extend the holiday park to the west on the opposite side of the Coast Road. This field makes an important contribution to the setting and significance of the church. It provides an open area of attractive rural landscape which helps to convey the context in which the church has existed for much of its history and provides a pleasant setting for the building.
- 8.15 Historic England previously advised that development of the field would change the rural setting of the building. However, HE suggested limiting the development to the northern half of the field or to the north of the retained woodland would help to reduce the level of harm. The current scheme follows this approach, limiting the development to this northern area. HE considers that this would have a reduced impact on the significance of the church and, subject to appropriate planting including the field boundaries and the maintenance of this planting, the harm would be of a low level. The Council's Senior Design and Conservation Officer has also reviewed the scheme and concludes as follows:

*"I am of the view that providing the soft landscaping is adequate to maintain a visual screen throughout the whole year between the open green space and the static caravans and also provide some screening between the site and the highway, I do not object to the application receiving consent.*

*The setting of the church still is affected by the proposal to some degree, with the harm caused is considered to be less than substantial clause, as set out in 196 of the NPPF. Although less than substantial harm, this harm, is assessed to be low to medium."*

- 8.16 NPPF paragraph 196, referenced above, has now been superseded by a revised paragraph 202; however, the balancing test of public benefits weighed against less than substantial harm is essentially the same. For the purposes of this report, the balancing exercise will be undertaken in the conclusion section, but the low-to-medium level of harm to the setting of the Grade II\* Church will need to be given great weight in the balance, as required by NPPF paragraph 199.

## Highways Safety and Sustainable Transport

- 8.17 Policy WLP8.21 promotes sustainable transport, which also includes development that is safe in highways terms. The NPPF sets out (inter alia) that:
- 8.18 Paragraph 110 - *“it should be ensured that... (b) safe and suitable access to the site can be achieved for all users”*; and
- 8.19 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.”*
- 8.20 With the addition of 159 Caravans, Broadland Sands Holiday Park will have in the region of 690 units on site. The (updated) Transport Assessment (TA) sets out that the site is currently operating with no reported access issues, however the TA assessed peak traffic flows associated with the summer season. Importantly, this was carried out before the pandemic, so it would not have been influenced by any lockdowns or other restrictions and is therefore a more accurate reflection of the situation when hopefully things return to normal.
- 8.21 The traffic generation figures show that during the assumed AM and PM highway peak hours on the local network, the proposals in isolation will generate approximately 13 trips in the AM Peak and 43 trips in the PM Peak. The 11:00 – 12:00 period generates a similar amount of traffic as per the PM highway peak.
- 8.22 On average, this would create an additional vehicle trip every 90 seconds in PM peak, which is the worst case for the highway network (and an additional vehicle trip every 90 seconds in predicted holiday park peak).
- 8.23 Parking requirements are set out within the Caravan Site Licence issued by the Council as derived from Ministers Model Standards and are distinct from other parking standards. Such Model Standards generally require 1 No. parking space per pitch, together with sufficient additional parking to meet the needs of visitors and others.
- 8.24 There has been significant discussion between officers, the applicant’s agent, and the three relevant Highways consultees in this case (Suffolk County Council Highways Authority, Norfolk County Council Highways Authority, and Highways England).
- 8.25 SCC highlighted the potential issues regarding the junction of the A47 / Stirrups Lane, and traffic attempting to join the A47 from Stirrups Lane. A signing strategy was suggested which would encourage traffic exiting the site to avoid this junction. NCC have also requested a signing strategy to properly direct traffic to and from the site to ensure that all traffic is not directed along Longfulans Lane. Highways England have also required a signing strategy by condition.
- 8.26 It is therefore clear that conditions will need to secure this strategy pre-commencement and it will require the approval of all three highways consultees. However, in principle, all parties accept that traffic can be mitigated/managed in part by effective signage.
- 8.27 Part of the required mitigation is for a series of off-site highway works on Longfulans Lane, to widen the lane and provide several passing places to enable the better flow of traffic. This would be subject of condition and s278 agreement with the relevant Highways Authority.

- 8.28 In terms of the Coast Road in the vicinity of the site, crossing points will be delivered to enable safe access from the development, across the road, to the facilities at The Park. The TA plans show this to include signalised pedestrian crossings. The precise detail of pedestrian crossings would need to be secured via condition and s278 agreement with the relevant Highways Authority.
- 8.29 The scheme also includes a car park for the Church, to be located in the southeastern corner of the site. SCC Highways Authority have confirmed that, subject to the vehicle access to that car park being to the east, off Coast Road, that they are in a position to recommend conditions. SCC are to provide a full list of recommended conditions prior to the committee meeting, and those will be detailed for members in the update sheet published 24-hours before the meeting.
- 8.30 The Church car park would also include a dropped kerb pedestrian crossing, adjacent to bus stops. These off-site highways works would again need to be secured by condition and s278 agreement with the relevant Highways Authority.
- 8.31 The proposal includes a shared cycle/footway running within the site, north-to-south. Given the relationship of the site to a bridleway located to the south of the site which connects to Church Lane, officers recommend that a condition be applied to secure precise details of this footway/cycleway and how it can connect up to existing rights of way. This takes on greater importance with the likely development of North of Lowestoft Garden Village, and the Council's work on the Cycling and Walking Strategy to deliver this infrastructure across the District.
- 8.32 In terms of the main vehicle access into the application site, that is detailed in the TA with the required visibility splays and found by highways consultees to be acceptable.
- 8.33 For the reasons set out, with the appropriate conditions, the scheme is acceptable in highways safety and sustainable transport terms, in accordance with WLP8.21 and the NPPF.

#### Landscape and Visual Impact

- 8.34 The application is supported by a detailed Landscape and Visual Impact Assessment, and the Council's Arboriculture and Landscape Manager has provided detailed feedback on the scheme, raising no objections.
- 8.35 The site falls within the landscape character type H1 'Blundeston Tributary Valley Farmland', as defined by the Great Yarmouth and Waveney Landscape Character Assessment, which notes that the settlement edges of Lowestoft, Corton and Great Yarmouth create an urbanising influence. It is also noted that views are contained by a small to medium scale landscape partially contained by wooded skylines. The site is relatively well contained by trees including those along the former Lowestoft to Great Yarmouth railway line that runs to the west of the site, together with a copse of trees within the site. The site is also largely fringed with hedgerows and trees which also exist in the wider surrounding landscape. The consequence of this is that the site is relatively well visually contained with limited views to the sea, although church towers form historic markers in the landscape. Expansion of tourism related development has been a key force for change in recent decades. The landscape character assessment raises concerns over the potential for loss of open coastal edges to the landscape type through expansion of settlement edges. The use of native species planting to contain development edges is advised.

- 8.36 It is against this background that this proposed extension to the holiday park should be assessed. The submitted landscape assessment advises that the change from open farmland/scrub to holiday park will result in a substantial change in landcover/use. The majority of the development is not expected to exceed 4m. height and will be seen against the backdrop of the existing resort where views exist in the surrounding landscape. Therefore, it can be considered that there is a degree of contextual relevance. The assessment states that the significance of effects upon landscape character may be regarded as no more than slight adverse which is a conservative assessment but nonetheless a more realistic assessment still does not approach substantial significance, and this may be regarded as academic to a degree once mitigation measures are considered. Provided that the described mitigating planting is factored in, the significance of effects will reduce after 10-15 years to something nearer neutral, given also the prevailing character of the surrounding area.
- 8.37 As far as visual impacts are concerned, the assessment is thorough and realistic in its conclusions. It does not shy away from the fact there will be for PROW users in the immediate local area and adjacent to the site, substantial to moderate impacts for PROW users during the construction phase. These will reduce on completion and as mitigation planting takes effect to moderate to slight adverse impacts. Inevitably the significance of effects will reduce with distance from the site, and overall, it is assessed there will be no lasting significant adverse effects, and that includes for the nearest private resident receptors that have a view of the sites, and for users of the coast path.
- 8.38 The applicant has also submitted an arboricultural survey and impact assessment which has shown no significant impacts on trees arising from the proposed development. Also submitted are new tree, hedge and shrub planting proposals with an accompanying landscape management plan. Where these specifically deal with the boundaries to the new sites, they are suitable both for the prevailing local landscape character, and for the anticipated mitigation and screening benefits. Additional amenity planting is also shown for internal areas within the sites, which although somewhat limited in its extent, is suited to the prevailing growing conditions.
- 8.39 This current application comprises a notable reduction in the area of standing for caravans, and a significant increase in green open space at the southern end of the site which will, to a degree preserve the setting of the historic church. In terms of visual impacts, the development will have moderate adverse impact for some views in the immediate locality of the site, and these are expected to moderate over time as the proposed mitigation screen planting establishes and starts to mature. Whilst the change of land use from open field to caravan holiday park has some degree of harm to landscape character, it is balanced by the enhancement of the southern portion of the site as green open space from arable farmland which is considered as a benefit to landscape character.
- 8.40 As previously there are no significant identified impacts on existing trees, and the submitted landscape planting and landscape management plans are acceptable and may be regarded as approved plans in the event of planning permission being granted, and without the need for any additional landscape related Conditions.
- 8.41 Overall, there would be no adverse landscape and visual impact resulting from this application. The scheme accords with the objectives of WLP8.35.

### Residential Amenity

8.42 There are very few residential properties close to the site. Therefore, impacts on living conditions are more likely to be related to general traffic levels and any visual impacts arising from the development. For the reasons set out above, the proposal is considered acceptable in regard to these matters. The general tourism use will of course bring activity and some general disturbance, but the proposal will read as part of the existing tourism development and is unlikely to combine with that to bring about unacceptable residential amenity impacts. With the appropriate controls through conditions, the development of the site is of an acceptable scale to ensure that the amenity of nearby communities will not be harmed.

### Ecology and Biodiversity

- 8.43 Natural England have been consulted on the application and raise no objections.
- 8.44 An Ecology Report supports the application and concludes no adverse impact on protected and notable species. However, prior to the removal of trees T13, T14, T15 and T20, a licenced ecologist will need to undertake an inspection for bat roosts. It would therefore be appropriate for a planning condition to secure either: proof that no bats or bat roosts have been identified; or (if presence is identified) a copy of a European Protected Species Mitigation Licence from Natural England enabling lawful removal of the tree.
- 8.45 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.
- 8.46 The Suffolk Coast RAMS provides strategic mitigation measures to address this impact. To fund this mitigation financial contributions are collected from new developments. 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 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.
- 8.47 Subject to appropriate conditions 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).

### Flood Risk and Surface Water Drainage

- 8.48 Local Plan Policy WLP8.24 sets out that new housing development will not be permitted in high-risk flood areas.
- 8.49 Chapter 14 of the National Planning Policy Framework (NPPF) sets out planning for flood risk:

- Development should be directed away from areas at highest risk (para. 162).
- Local planning authorities should ensure that flood risk is not increased elsewhere, and applications should be supported by a site-specific flood-risk assessment. Development proposals in higher risk areas should demonstrate that:
  - Within the site development is directed to the lowest risk areas;
  - The development is appropriately flood resilient and resistant;
  - The development incorporates sustainable drainage systems;
  - Any residual risk can be safely managed; and
  - Safe access and escape routes are provided. (para. 167)
- Major developments should incorporate sustainable drainage systems (para. 169).

8.50 The policy approach at a national and local level generally, therefore, is to make developments safe for all future occupiers through appropriate siting and design; and then ensure no adverse local impacts arising from the development through ensuring that development sites are well-designed incorporating sustainable drainage systems.

8.51 The application site is located in environment agency flood zone 1 (the lowest risk area) and therefore sequentially preferable for residential development, hence the allocation within the Local Plan.

8.52 The application is supported by a Flood Risk Assessment and Surface Water Drainage Strategy. The Environment Agency have not commented on the application. However, the Local Lead Flood Authority have reviewed the application and raised no objections subject to the appropriate conditions securing the proper implementation of the drainage strategy.

8.53 The scheme accords with WLP8.24 and the NPPF.

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

8.54 Officers have sought advice from colleagues at Coastal Partnership East, who comment:

*“The site of this application is inland of the Coastal Change Management Area (CCMA) by a significant distance.*

*It is not at risk from coastal erosion within 100 years therefore no Erosion Risk Assessment is required.*

*However, the development site is an ancillary development to a parent site that is based within the CCMA therefore there is a potential risk to the viability of the wider combined development sites from erosion affecting the part closer to the sea within the CCMA.*

*CPE staff have been in consultation with the owners of the parent site on a number of projects in recent years and are comfortable that the site owner is aware of the risks to the investment posed by coastal erosion. CPE staff will be working with this owner in the near future about investment into a cliff top managed realignment to help slow the erosion. This approach will also deliver community benefit by enhancing the beach area below the*

*caravan park. For these reasons no further information on coastal erosion risk is required from the developer.”*

8.55 The proposed development will meet the objectives of policy WLP8.26, because it is a pre-emptive development to extend The Park onto land well outside of the CCMA. Therefore, if the existing Park has to continue removing Caravans due to coastal erosion, the proposed expansion to the west will ensure The Park has a viable future. The proposal is not a true ‘rollback’ scheme, because in the short-to-medium term it will be a simple expansion of the existing Park; however, longer term, it will futureproof the operation against coastal erosion risks. From a planning perspective, early planning for rollback is critical and that this scheme accords with the general aims of WLP8.26 is a key benefit. The Park is an important tourism asset in the local economy, and it is critical to ensure that it can continue to operate and adapt to the challenges of coastal erosion.

#### Other Matters

8.56 The site is fairly close to the strategic allocation – North of Lowestoft Garden Village (policy WLP2.13). This allocation will deliver:

- approximately 1300 new dwellings
- Retirement community comprising a care home / nursing home and extra care and/or sheltered dwellings;
- 2 form entry primary school and a pre-school setting (2.2 hectares);
- A local shopping centre comprising a convenience store, cafés, a pre-school setting, community centre and other local services;
- Playing field, play areas and green infrastructure; and
- 8 hectares of employment development (falling under use classes B1, B2 and B8).

8.57 Whilst the site is near to this strategic site allocation, it will not prejudice its delivery. The proposal is a tourism use and the allocation does not provide for that form of development. The associated off-site highway works mitigate the impacts of this tourism proposal, and any future application for North of Lowestoft Garden Village will need to be supported by its own Transport Assessment and deliver any mitigation or highways improvements required. In terms of this current application, there are no reasons to withhold permission based on the close proximity of a strategic site allocation; it appears the two developments can co-exist without issue.

#### Benefits of the Development

8.58 The current development at Broadland Sands is currently generating £14.84m per annum into the local economy. The proposed development of 159 pitches could add, according to the agent, a further £4.7m per annum into the local economy. The additional spinoff benefits into the local economy could add a further £8.5m per annum.

8.59 The Council’s Economic Development Team are supportive of the application.

8.60 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.

- 8.61 The change in holidaying trends as a result of the pandemic, and the rise of the 'staycation' further support that expansion of The Park will bring local economic benefits.

## **9. Conclusion**

- 9.1 The proposed development is a logical extension to The Park providing significant economic benefits, supporting an existing tourism use. The proposal would ensure that Broadland Sands Holiday Park can move inland over time, adapting to the challenges of coastal erosion in this area.
- 9.2 As an extension to an existing Holiday Park in the resort area of Corton, the proposal accords with WLP8.15 and the Local Plan spatial strategy in terms of larger scale tourism proposals.
- 9.3 The amended scheme has overcome the refusal reasons given in respect of the previous application. That approximately the southern half of the site will be green open space, along with the number of units reducing down to 159 Caravans, means that the harm to the setting of the Grade II\* Church is reduced to a low-to-medium level. Even giving great weight to that heritage harm, it is considered that the significant economic benefits of the scheme, in combination with other benefits, outweigh any harms arising. The required balancing test (at paragraph 202 of the NPPF) therefore indicates in favour of the scheme.
- 9.4 With regard to highways matters, there has been significant input from Suffolk and Norfolk County Council's in addition to Highways England. The local concerns about capacity of the road network to accommodate this development are noted and have been considered, but the application is supported by an updated Transport Assessment and the statutory consultees on highways matters raise no objection subject to a number of conditions being applied to a grant of planning permission.
- 9.5 The proposed scheme is acceptable in terms of landscape and visual impact and will integrate into its semi-rural context, subject to proper implementation of the landscaping strategy.
- 9.6 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 (including but not limited to those summarised in section 11 of this report); 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:**

- 11.1 The following is a summary list of planning conditions. The full detailed wording will be provided to Members in the Update Sheet published 24-hours before the meeting.

1. Three-year time limit.
2. Development in accordance with approved plans (including the proposed landscaping plans and tree protection measures).
3. Landscaping - Implementation of proposed landscaping and tree protection measures, including re-planting during a 5-year period where required.
4. Drainage - Surface water drainage strategy to be implemented in accordance with approved FRA.
5. Drainage - Details of completed drainage strategy components/piped networks to be submitted for inclusion on the Local Lead Flood Authority's Asset Risk Register.
6. Drainage - Construction Surface Water Management Plan to be provided prior to commencement of development.
7. Archaeology - No development on a phase until a programme of archaeological work for that phase has been secured, in accordance with a Written Scheme of Investigation.
8. Archaeology - No caravans within a phase or sub-phase shall be occupied until the archaeological site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority.
9. Land Contamination - Standard condition requiring action if unexpected contamination encountered.
10. Design/External Appearance - Prior to the siting of any static holiday caravans on the land, a colour scheme/palette for the external appearance of the static caravans shall be submitted and approved.
11. Use - The approved static caravans shall be used for holiday/tourism accommodation only, and control of occupation period.
12. Number of Caravans and Location on Site - No more than 159 static 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. Static caravans shall not be sited on the southern part of the application site denoted as 'Open Greenspace' on the Illustrative Site Layout.
13. Ecology – proof of no roosting bats, or copy of Natural England licence to be provided before tree work.
14. Rights of Way – prior to occupation of any Caravans, details of the public footway through the site, and its connection to existing public rights of way, to be submitted and approved. The route to then be implemented in a timely manner and retained for that purpose.

15. Highways - Prior to the proposed development being brought into beneficial use a system of signs from the A47 to and from the proposed development site is to be approved and then implemented in a timely manner.
16. Highways – Prior to commencement of development, detailed drawings for the off-site highway improvement works (widening of Longfulans Lane and formalisation of passing bays and direction signing) to be submitted and approved.
17. Highways - No works shall commence on the site until such time as detailed plans of the proposed direction road sign (signing strategy) to and from the development have been submitted and approved in writing with the Local planning Authority.
18. Highways - off-site highway improvement works to be completed at the appropriate stage of development to ensure impacts are mitigated.
19. Church Car Park – details of construction, surfacing, layout etc to be submitted and approved prior to commencement of development.
20. Church Car Park – to be completed at the appropriate stage of development and retained for that purpose.
21. Construction period – Construction Management Plan to be submitted and approved prior to commencement of development.

### **Background Papers**

See application reference DC/19/2949/COU on [Public Access](#)