

# Development Committee



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**TO REGISTER TO SPEAK PLEASE CALL 01263 516150**

7 August 2019

A meeting of the **Development Committee** will be held in the **Council Chamber - Council Offices, Holt Road, Cromer, NR27 9EN** on **Thursday, 15 August 2019** at **9.30 am**.

Coffee will be available for Members at 9.00am and 11.00am when there will be a short break in the meeting. A break of at least 30 minutes will be taken at 1.00pm if the meeting is still in session.

Any site inspections will take place on **5 September 2019**.

## **PUBLIC SPEAKING – TELEPHONE REGISTRATION REQUIRED**

Members of the public who wish to speak on applications are required to register **by 9 am on Tuesday 13 August 2019** by telephoning **Customer Services on 01263 516150**. Please read the information on the procedure for public speaking on our website [here](#) or request a copy of "Have Your Say" from Customer Services.

Anyone may take photographs, film or audio-record the proceedings and report on the meeting. You must inform the Chairman if you wish to do so and must not disrupt the meeting. If you are a member of the public and you wish to speak, please be aware that you may be filmed or photographed.

**Emma Denny**  
**Democratic Services Manager**

**To:** Mrs P Grove-Jones, Mr P Heinrich, Mr D Baker, Mr A Brown, Mr P Fisher, Mrs A Fitch-Tillett, Mrs W Fredericks, Mr R Kershaw, Mr N Lloyd, Mr G Mancini-Boyle, Mr N Pearce, Dr C Stockton, Mr A Varley and Mr A Yiasimi

**Substitutes:** Mr T Adams, Dr P Butikofer, Mrs S Bütikofer, Mr N Housden, Mr J Punchard, Mr J Rest, Mrs E Spagnola, Mr J Toye and Ms K Ward

All other Members of the Council for information.

Members of the Management Team, appropriate Officers, Press and Public



**If you have any special requirements in order  
to attend this meeting, please let us know in advance**

If you would like any document in large print, audio, Braille, alternative format or in a different language please contact us

**Heads of Paid Service:** Nick Baker and Steve Blatch  
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## **AGENDA**

**PLEASE NOTE: THE ORDER OF BUSINESS MAY BE CHANGED AT THE DISCRETION OF THE CHAIRMAN**

### **PUBLIC BUSINESS**

1. **CHAIRMAN'S INTRODUCTIONS**

2. **TO RECEIVE APOLOGIES FOR ABSENCE AND DETAILS OF ANY SUBSTITUTE MEMBER(S)**

3. **MINUTES**

To approve as a correct record the Minutes of meetings of the Committee held on 11 April and 18 July 2019

4. **ITEMS OF URGENT BUSINESS**

(a) To determine any other items of business which the Chairman decides should be considered as a matter of urgency pursuant to Section 100B(4)(b) of the Local Government Act 1972.

(b) To consider any objections received to applications which the Head of Planning was authorised to determine at a previous meeting.

5. **ORDER OF BUSINESS**

(a) To consider any requests to defer determination of an application included in this agenda, so as to save any unnecessary waiting by members of the public attending for such applications.

(b) To determine the order of business for the meeting.

6. **DECLARATIONS OF INTEREST**

Members are asked at this stage to declare any interests that they may have in any of the following items on the agenda. The Code of Conduct for Members requires that declarations include the nature of the interest and whether it is a disclosable pecuniary interest.

### **OFFICERS' REPORTS**

### **ITEMS FOR DECISION**

#### **PLANNING APPLICATIONS**

7. **BACONSTHORPE - PF/18/1921 - PROPOSED CHANGE OF USE OF LAND FROM AGRICULTURAL TO TENT-ONLY CAMPSITE FOR A MAXIMUM OF 63 UNITS OF TENTS-ONLY CAMPING WITH ASSOCIATED ELECTRIC HOOK-UP POINTS. CHANGE OF USE OF PART OF THE EXISTING CAMPSITE TO CREATE A WILDFLOWER MEADOW. USE OF PART OF THE EXISTING AGRICULTURAL FIELD** (Pages 1 - 18)

FOR WILDFLOWER MEADOW. ERECTION OF 6 CAMPING PODS. RETROSPECTIVE ERECTION OF CAMP SITE RECEPTION/SHOP BUILDING, SHOWER AND WASH-UP BLOCK, TWO TOILET BLOCKS, UTILITY BLOCK AND CHILDREN'S PLAY AREA. [RECONSULTATION: AMENDED LAYOUT PLAN AND REVISED DESCRIPTION]; BACONSTHORPE MEADOWS CAMPSITE AT, PITT FARM, THE STREET, BACONSTHORPE, HOLT, NR25 6LF FOR A V YOUNGS FARMS LIMITED

8. EAST BECKHAM - PF/19/1009 - VARIATION OF CONDITION 3 OF PLANNING PERMISSION PF/15/1486 (A VARIATION OF PF/13/0772 FOR INSTALLATION OF A 10.15MW SOLAR DEVELOPMENT) TO EXTEND THE MAXIMUM OPERATIONAL LIFETIME OF THE SOLAR FARM FROM 25 YEARS TO 40 YEARS; SOLAR FARM, CHURCH ROAD, WEST BECKHAM, HOLT, NR25 6NX FOR HALL SOLAR LTD (Pages 19 - 26)
9. RAYNHAM - PF/19/0893 - VARIATION OF CONDITION 4 OF APPLICATION REF: PF/13/1166 (INSTALLATION OF 49.9MW SOLAR FARM WITH PLANT HOUSING AND PERIMETER FENCE) TO EXTEND THE OPERATIONAL LIFETIME OF THE DEVELOPMENT FROM A MAXIMUM OF 30 YEARS TO 40 YEARS.; SOLAR FARM, BLENHEIM WAY, WEST RAYNHAM, FAKENHAM, NR21 7PL FOR WEST RAYNHAM SOLAR LIMITED (Pages 27 - 36)
10. TRIMINGHAM - PF/18/2051 - INSTALLATION OF 56 STATIC HOLIDAY LODGE BASES, WITH ASSOCIATED ACCESS, SERVICES, VERANDA, CAR PARKING SPACES AND LANDSCAPING [RECONSULTATION - AMENDED DESCRIPTION AND ADDITIONAL INFORMATION 10/06/2019]; WOODLAND HOLIDAY PARK, CROMER ROAD, TRIMINGHAM, NORWICH, NR11 8QJ FOR WOODLAND HOLIDAY PARK (Pages 37 - 66)
11. FAKENHAM - PF/19/0729 - DETACHED CARTSHED AND STORE TO FRONT OF PROPERTY; 21 JUBILEE AVENUE, FAKENHAM, NR21 8DG FOR MR & MRS ANTHONY (Pages 67 - 70)
12. FAKENHAM - PF/19/0787 - ERECTION OF SINGLE STOREY REAR EXTENSION; 151 HOLT ROAD, FAKENHAM, NR21 8JF FOR MR PUNCHARD (Pages 71 - 72)
13. LITTLE SNORING - PF/19/0404 - ERECTION OF SINGLE-STOREY DETACHED DWELLING; 3 PANTILE COTTAGES, KETTLESTONE ROAD, LITTLE SNORING, FAKENHAM, NR21 0JQ FOR MR R G DEARY (Pages 73 - 76)
14. APPLICATIONS RECOMMENDED FOR A SITE INSPECTION (Pages 77 - 78)
15. APPEALS SECTION (Pages 79 - 80)
  - (a) New Appeals
  - (b) Inquiries and Hearings – Progress
  - (c) Written Representations Appeals – In Hand
  - (d) Appeal Decisions – Results and Summaries
  - (e) Court Cases – Progress and Results

16. ANY OTHER URGENT BUSINESS AT THE DISCRETION OF THE CHAIRMAN AND AS PREVIOUSLY DETERMINED UNDER ITEM 4 ABOVE

17. EXCLUSION OF PRESS AND PUBLIC

To pass the following resolution, if necessary:-

“That under Section 100A(4) of the Local Government Act 1972 the press and public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A (as amended) to the Act.”

PRIVATE BUSINESS

18. ANY OTHER URGENT EXEMPT BUSINESS AT THE DISCRETION OF THE CHAIRMAN AND AS PREVIOUSLY DETERMINED UNDER ITEM 4 ABOVE

19. TO CONSIDER ANY EXEMPT MATTERS ARISING FROM CONSIDERATION OF THE PUBLIC BUSINESS OF THE AGENDA

**BACONSTHORPE - PF/18/1921 - Proposed change of use of land from agricultural to tent-only campsite for a maximum of 63 units of tents-only camping with associated electric hook-up points. Change of use of part of the existing campsite to create a wildflower meadow. Use of part of the existing agricultural field for wildflower meadow. Erection of 6 camping pods. Retrospective erection of camp site reception/shop building, shower and wash-up block, two toilet blocks, utility block and children's play area. [Re-consultation: Amended Layout Plan and Revised Description]; Baconsthorpe Meadows Campsite At, Pitt Farm, The Street, Baconsthorpe, Holt, NR25 6LF for A V Youngs Farms Limited**

## **Major Development**

- Target Date: 08 February 2019

- Extension of time agreed until 22 August 2019

Case Officer: Nick Westlake

Full Planning Permission

## **RELEVANT CONSTRAINTS**

Countryside

C Road

Part of site within/adjacent to Conservation Area

Public Right of Way

EA Risk of Flooding from Surface Water 1 in 1000

Mineral Safeguard Area

## **RELEVANT PLANNING HISTORY**

PF/17/2187 Change of use of agricultural land to campsite (40 tents) and installation of 10 timber camping pods/lodges, with associated works - Withdrawn by Applicant 14/03/2018

PF/15/1774 Variation of condition 4 of planning permission ref: 12/1263 to allow extended use until 31 October and re-open 20 March - Approved 22/04/2016

PF/14/0705 Pitt Farm, The Street, Baconsthorpe, Conversion of barns to six residential dwellings - Approved 01/08/2014

CDA/12/1263 Discharge of conditions 9 & 15 of planning permission PF/12/1263  
Condition Discharge Reply 15/03/2016

PF/12/1263 Change of use of land from agriculture to 53 units tent-only campsite and formation of vehicular access - Approved 24/01/2013

PF/12/0562 PF Hare & Hounds, Baconsthorpe Road, Hempstead, Holt, NR25 6LD  
Change of use from Public House to residential dwelling - Refused 28/05/2014  
Appeal Allowed - 17/03/2015 (Planning Appeal APP/Y/2620/A/14/2228487)

## **THE SITE AND ITS SURROUNDINGS**

The site, known as Baconsthorpe Meadows Camp site is located on the southern side of The Street within the hamlet of Baconsthorpe approximately 2 miles east of Holt, which is accessed via the Hempstead Road (C class road).

The camping site was opened in 2013 following the grant of planning permission (ref: PF/12/1263) allowing for a 'Change of use of land from agriculture to a 53 unit tent-only

campsite and formation of vehicular access’.

The entrance to the campsite is found on ‘The Street to the west of the hamlet of Baconsthorpe, approximately 55 metres west of a property known as Meadowbank. The campsite access road then navigates eastwards some 300 metres behind Meadowbank, the old Hare and Hounds Public House and the Old Barn, that are all residential dwellings located in a small cluster south of The Street, and all effectively immediate neighbours to the existing campsite.

South of the first 150 metres of this access route, there is an existing large open field measuring some 100 metres in width and 170 metres in length. This is outside the curtilage of the existing campsite. There is a small hedge planted in a cross shape, centrally positioned to divide the field up. This field is enclosed by an approximate 2 metre high hedge, the eastern boundary is adjacent to the existing campsite and a public right of way that runs from north to south to one side of the campsite.

The current operational campsite site is east of this neighbouring field, measures some 100 metres in width and 300 metres in length being broadly rectangular in nature. The eastern area is dedicated for car parking, the Wardens Office and the onsite Shower, Washing and W.C facilities.

The red line of the original application approval (ref: PF/12/1263) did not permit car parking or shower/washing block area which are currently being used by the applicant without the benefit of planning permission.

Approximately 30% of the existing camping area is north of the access road, with the remaining 70% south of this access road. The fields are enclosed with fencing and hedging that is approximately 2 metres in height and well established.

The campsite is closely associated with Pitt Farm to the east, a working arable farm, opposite Hall Lane which leads to the historic site of Baconsthorpe Castle. Application PF/14/0705 allowed for the ‘Conversion of barns to six residential dwellings’ at Pitt Farm. These buildings are not part of this development and benefit from a new separate access to the east of the buildings away from the campsite access.

There is a public right of way known as the Holt – Mannington Walk or Hempstead Footpath 14 running to the west of the existing site. Effectively, this acts as the western boundary of the campsite. This western boundary also contains a number of mature trees. A permissive bridleway between Field Lane and the western edge of the campsite was agreed and implemented as part of the 2012 planning application, known as Hempstead Bridleway 11.

Surrounding the entire site, there are agricultural fields to the south, east and west, with residential properties as mentioned to the north. These properties are in part between 10 and 30 metres distance from the existing host site, making a close relationship between these opposing land uses.

There are no environmental designations on the site. The site is, save for a small section along the eastern boundary, outside of but adjacent to outside Baconsthorpe Conservation Area. Ultimately the site falls within the landscape setting of this heritage asset. However, there are no Listed Buildings or Ancient Ruins within immediate or close proximity to the site.

## **PROPOSAL**

Proposes to increase the size of the campsite by expanding the 'curtilage' or red line area of the site. This expansion is to enable the campsite to accommodate an additional 10 camping pitches bringing the number up to 63 from 53. Separate to this there are 6 proposed camping pods making the overall total number of Camping pitches and camping pods 69 from the existing number of 53 camping pitches only.

These pitches would be spread across the existing field and the newly proposed field.

The proposed camping pods are approximately 2.5 metres wide, 2.7 metres in height and 3.0 metres in length. They are wooden in material and will be coloured a dark stain.

The expansions to the red line area or curtilage of the campsite includes two main areas; to the west of the existing site and to the east of the existing site.

The proposal includes two wild flower meadows which, amongst other things, help provide a 'buffer zone' from the main campsite in the interests of preserving and protecting residential amenity. Separate to the proposed meadows, a widespread level of additional planting and screening has been designed into the application with over 150 new trees and hedges being introduced.

On the eastern side of the site the applicant is seeking to regularise a number of uses including an area of land used for campsite car parking, a children's play area and a number of structures including a warden's office/on site shop, shower and washing blocks and a toilet block. The toilet blocks/shower buildings are green in colour and porta cabin like in appearance measuring approximately 9 metres in length, 3 metres in width and 3 metres in height. The office building is a smaller wooden shed type building.

The six proposed camping pods are located in this area in groups of three, one group to the east and one group to the south of the main campsite facilities.

Finally, the application includes the creation and retention of a number of electrical hook up points within the site, overall 30 electrical points are shown, 12 newly proposed and 18 existing these are seeking retrospective permission. They are non-illuminated and stand at 1 metre in height and approximately 0.2 metres wide.

## **REASONS FOR REFERRAL TO COMMITTEE**

At the request of the Head of the Planning & Building Control to allow for the complex planning issues regarding to be public heard and considered by Committee.

## **REPRESENTATIONS**

8 letters of representation have been received, 1 in support and 7 in objection:

Summary of representations of objection:

- Neighbours do not wish to see an increase in the size of the campsite
- The wildflower meadows will not keep campers off this land
- How will there be guarantees the wildflower meadows will be planted
- The south east field has been included into this way has this expansion been allowed, will it be used for camping?
- Many previous planning conditions have been breached on site why should the

- applicant be trusted this time round
- Camper vans have been using the site
- The septic tank is too small
- The campsite access is very narrow, undrained and not lit, how will it accommodate the extra traffic
- The farm and school traffic together with the extras movements predicted from the camp site will make the area intolerable for local residents.
- This is not a 'back to basics' campsite
- When the site is empty most of the time why are they proposing the expansion
- The traffic monitoring assessment from Kingdom TP was misleading in its remit, scope and methodology. Ultimately giving incorrect readings of the proposed traffic impact of the development
- No additional noise especially late at night is wanted by the neighbours
- No new jobs are created
- The toilet blocks are unsightly and should be further screened
- The plans are misleading and don't show the electrical hook up points
- There is a lack of toilets on site and the drainage is inadequate
- Loss of agricultural land
- The smoke and noise (including dogs barking) coming from the site from morning to night is at an unacceptable level
- The tents on the site are too large allowing for 10 people to stay per tent
- Any increase in traffic flow will necessitate even more use of 'passing places' on the Holt to Baconsthorpe Road
- There is no pavement through Baconsthorpe additional people could lead to a highway safety concern

Summary of representation in Support:

- The site supports the local economy
- The business is seasonal so the highway impact is limited.
- The small increase shall have negligible impact on the local area.

## **CONSULTATIONS**

### **Environmental Health: No Objection**

There are sufficient toilet and shower facilities on site. Provided that the applicant is able to demonstrate that the foul water drainage scheme on site will be sufficient there are no objections to this application on Environmental Health grounds.

The applicant is in the process of getting a Foul Drainage Permit from the Environment Agency this is a separate independent process to a Planning Application about which the Local Planning Authority have no input.

### **Environment Agency: No Objection, subject to condition**

The current treatment system is a 6,000 litre septic tank which discharges into the ground. On the basis of 2 people per tent pitch and camping pod, a tank with a capacity to treat 10,350 litres per day is required. As such a condition is recommended restricting commencement of the proposal until an adequate drainage scheme is submitted to the LPA and implemented as approved.



The applicant has applied for a Foul Drainage Permit and this is shortly to be issued by the Environment Agency.

**Public Rights of Way:** No Objection

There are two Public Rights that are aligned within the site, Hempstead Footpath 14 and Hempstead Bridleway 11. The additional planting is welcomed however the full legal extent of these Public Rights of Way must remain open and accessible for the duration of the development and subsequent occupation. This includes the encroachment of the screening vegetation, which must be planted back from the PROW to allow for growth and to maintain the legal widths.

**Highways:** No Objection

Despite the original objection to the application, the Highways Authority reversed their decision. This is due to the fact that only modest car borne traffic expected is expected and also the Hempstead Road is wide enough for two cars to pass. Ultimately, they do not believe that they could substantiate a highway safety objection to the current proposal.

**Building Regulations:** No Objections

The drainage from the 'mobile buildings' housing the shower and W.C block would not require Building Regulations approval due to the fact they are 'mobile buildings'.

**Open Spaces Society:** Objection

The public's views and quiet experience of the countryside, meadows and farm buildings will be spoilt by the proposed buildings, structures and associated paraphernalia associated with the camp site. The landscaping is limited and will not mitigate against this harm. Furthermore, the width of the Bridleways that go through and run adjacent to the site should be a minimum width of between 3 and 5 metres.

**Lead Local Flooding Authority:** No Objection

No objection given the site is not within a surface water flow path as defined the Environment Agency.

**Landscape Officer:** No Objections

The development as proposed would have limited negative impacts on the local landscape character. Subject to the implementation of the Landscape Strategy, the development accords with the requirements of policies EN2 and EN4 of the Core Strategy and meet the requirements of the NPPF.

A condition should be attached to any permission given to secure the long term protection of the landscape planting.

**Environmental Protection:** No Objection

There have been no historic complaints regarding amenity issues or operational problems relating to the running of the site. Having a buffer zone between the campsite and the residents would be beneficial in helping overcome concerns in relation to loss of residential amenity. Non gravel surfacing would help reduce the noise of vehicle movements. With regards to camp fires and fire pits on site, discussions with the owners are suggested to reach an agreement on usage. Car parking is advised to be as far from the residential properties as possible.

**Baconsthorpe Parish Council:** No Objection

Subject to a condition being imposed that the site is restricted to tents and the camping pods only.

**Hempstead Parish Council:** No Response

## **RELEVANT POLICIES**

### **North Norfolk Core Strategy and Development Control Policies (2008)**

- Policy SS2: Development in the Countryside (*prevents general development in the countryside with specific exceptions*).
- Policy SS 4: Environment (*strategic approach to environmental issues*).
- Policy SS 5: Economy (*strategic approach to economic issues*).
- Policy EN 1: Norfolk Coast Area of Outstanding Natural Beauty and The Broads (*prevents developments which would be significantly detrimental to the areas and their setting*).
- Policy EN 2: Protection and enhancement of landscape and settlement character (*specifies criteria that proposals should have regard to, including the Landscape Character Assessment*).
- Policy EN 4: Design (*specifies criteria that proposals should have regard to, including the North Norfolk Design Guide and sustainable construction*).
- Policy EN 8: Protecting and enhancing the historic environment (*prevents insensitive development and specifies requirements relating to designated assets and other valuable buildings*).
- Policy EN 9: Biodiversity and geology (*requires no adverse impact on designated nature conservation sites*).
- Policy EN 10: Flood risk (*prevents inappropriate development in flood risk areas*).
- Policy EN 13: Pollution and hazard prevention and minimisation (*minimises pollution and provides guidance on contaminated land and Major Hazard Zones*).
- Policy EC 3: Extensions to existing businesses in the Countryside (*prevents extensions of inappropriate scale and that would be detrimental to the character of the area*).
- Policy EC 7: The location of new tourism development (*provides a sequential approach for new tourist accommodation and attractions*).
- Policy EC 10: Static and touring caravans and camping sites (*specifies criteria for new sites and extensions or intensification of existing sites*).
- Policy CT 5: The transport impact on new development (*specifies criteria to ensure reduction of need to travel and promotion of sustainable forms of transport*).
- Policy CT 6: Parking provision (*requires compliance with the Council's car parking standards other than in exceptional circumstances*).

### **Relevant National Planning Policy Framework (NPPF) sections:**

- Section 1 – Building a strong and competitive economy
- Section 3 – Supporting a prosperous rural economy
- Section 7 – Requiring good design
- Section 12 – Achieving well-designed places
- Section 15 – Conserving and enhancing the natural environment

## **Other material considerations:**

- North Norfolk Design Guide Supplementary Planning Document (December 2008)

## **OFFICER ASSESSMENT**

### **Main Issues:**

- 1. Principle of development;**
- 2. Extensions to Existing Businesses in the Countryside**
- 3. Location of New Tourism Development**
- 4. Static and Touring Caravan and Camping Sites**
- 5. Impact on Landscape Character**
- 6. Amenity**
- 7. Highways Safety and Parking**
- 8. Public Rights of Way**
- 9. Design**
- 10. Impact on Heritage Assets**
- 11. Ecology**
- 12. Drainage**
- 13. Material Considerations in favour of the proposal**

### **1. Principle of development**

The site is located within the Countryside Policy area where Policy SS 2 permits recreation and tourism proposals as well as extension to existing businesses subject to compliance with other relevant Core Strategy policies. Those other relevant policies would include Policy SS 4 in relation to the protection of the environment, Policy SS 5 in relation to the Economy requiring tourism proposals to demonstrate that they will not have a significant detrimental effect on the environment, Policy EN 2 in relation to landscape together with Policy EC 7 in relation to the location of new tourism development, Policy EC 3 in relation to extensions to existing businesses in the countryside and Policy EC 10 in relation to static and touring caravan and camping sites.

In terms of other material considerations, the National Planning Policy Framework (NPPF) indicates how Local Planning Authorities can support a prosperous rural economy including setting out at paragraph 83 that decisions *'should enable...sustainable rural tourism and leisure developments which respect the character of the countryside'*,

Assessment of the proposal against Core Strategy Policies and other relevant material considerations are set out below. Subject to the proposal according with these policies the principle of development would be considered acceptable. Where the proposal fails to accord with relevant Core Strategy policy it will be necessary to consider any other relevant material planning considerations in favour of the proposal to justify a departure from the Development Plan when making the planning balance.

### **2. Extensions to Existing Businesses in the Countryside**

The existing Baconsthorpe Meadows Campsite has become an established tourism business which makes a positive contribution to the local economy. Core Strategy Policy EC 3 sets out that *'extensions to existing businesses in the countryside will be permitted where it is of a scale appropriate to the existing development and would not have a detrimental effect on the*

*character of the area'*

This expansion is to enable the campsite to accommodate an additional 10 camping pitches bringing the number up to 63 from 53. Separate to this there are 6 proposed camping pods. Making the overall total number of Camping pitches and camping pods 69 from the existing number of 53 camping pitches only.

It is a planning judgement as to whether the further extension to the site is of an appropriate scale. Officers consider that the acceptability of expansion under Policy EC 3 hinges not only on the scale of growth but also on whether the proposal has a detrimental effect on the character of the area.

Whilst the scale of growth in terms of numbers is considered to be acceptable, the land-take given over to the enlarged camp site has been a concern for Officers with the potential for the site to be used for a larger number of camping plots than being applied for leading to potentially unacceptable adverse impacts. However, after lengthy discussion and negotiation with the applicant, a solution has been agreed which includes the planting of two areas of wildflower meadow which, in effect act to limit the number of plots on the site.

An assessment below considers the impact of the proposal on the wider landscape. Officers consider that, with the addition of mitigation planting, the proposal would not have a detrimental effect on the character of the area.

As such it can be reasonably concluded that the proposal would accord with the requirements of Core Strategy Policy EC 3.

### **3. Location of New Tourism Development**

Core Strategy Policy EC 7 sets out that:

*'New tourist accommodation and attractions should be located in accordance with the sequential approach below:*

- *Proposals for new build tourist accommodation and attractions should be located within the Principal and Secondary Settlements.*
- *Within the Service Villages, Coastal Service Villages and the Countryside proposals for new tourist accommodation and attractions will be permitted in accordance with other policies for Employment Areas, the Re-use of Buildings in the Countryside, and Extensions to Existing Businesses in the Countryside.*
- *Where it can be demonstrated that there are no sequentially preferable sites, no suitable buildings for re-use and that a rural location is necessary, then new build attractions and serviced accommodation may be permitted in the 'resorts and hinterland' and 'rural' Tourism Asset Zones of the Countryside where they are in close proximity and have good links to, the Principal and Secondary Settlements.*

*Proposals for new build unserviced holiday accommodation in the Countryside will be treated as though they are permanent residential dwellings and will not be permitted.'*

The countryside location of the site means that the proposal should be considered under the second bullet point within Policy EC 7. As such, the acceptability of the proposal under EC 7 is dependent upon whether the proposal accords with extension to businesses in the

countryside under Policy EC 3. As set out above, Officers consider the proposal to be of an acceptable scale and, with mitigation planting, would not have a detrimental effect on the character of the area meaning that the proposal would accord with the requirements of Core Strategy Policy EN 3 and therefore also meet the requirements of the second bullet point of Core Strategy Policy EC 7.

The proposal therefore accords with the requirements of Core Strategy Policy EC 7.

#### **4. Static and Touring Caravan and Camping Sites**

Core Strategy Policy EC 10 sets out that:

*‘Proposals for new static caravan sites or woodland lodge holiday accommodation will only be permitted where they result in:*

- *the removal of an existing cliff-top static caravan site; or*
- *the re-location of existing provision which is within the Coastal Erosion Constraint Area or Environment Agency Flood Risk Zone 3.*

*Proposals permitted under this exception should result in no significant intensification of the use and, if appropriate, comply with the criteria in Policy EN11 ‘Coastal Erosion’. Proposals should seek to re-locate to the ‘rural’ and ‘resorts and hinterland’ Tourism Asset Zones in preference to the ‘coastal’ or ‘North Norfolk Broads’ zones.*

***Extension of, or intensification of, existing static caravan sites (including replacement with woodland lodges) and touring caravan / camping sites will only be permitted where the proposal:***

- ***conclusively demonstrates a very high standard of design and landscaping and minimal adverse impact on its surroundings;***
- ***is appropriate when considered against the other policies of the plan.***

*New touring caravan and camping sites will not be permitted within the Norfolk Coast AONB, Undeveloped Coast or Environment Agency Flood Risk Zone 3. Elsewhere proposals will be judged against other Core Strategy policies. Temporary permission may be granted within the Coastal Erosion Constraint Area’.*

The proposal before Committee does not involve the removal of an existing cliff-top static caravan site nor does it result in the removal of existing provision within the Coastal Erosion Constraint Area or Environment Agency Flood Risk Zone 3.

The proposal represents an extension of an existing camping site and, after lengthy discussion and negotiation with the applicant, a solution has been agreed which, on balance, demonstrates a high standard of design and landscaping with minimal adverse impact on its surroundings and which generally accords with the requirements of other relevant policies of the Core Strategy.

As such the proposal is considered to accord with the requirements and aims of Core Strategy Policy EC 10.

## 5. Impact on Landscape Character

Core Strategy Policy EN 2 sets out that:

*‘Proposals for development should be informed by, and be sympathetic to, the distinctive character areas identified in the North Norfolk Landscape Character Assessment and features identified in relevant settlement character studies.*

*Development proposals should demonstrate that their location, scale, design and materials will protect, conserve and, where possible, enhance:*

- *the special qualities and local distinctiveness of the area (including its historical, biodiversity and cultural character)*
- *gaps between settlements, and their landscape setting*
- *distinctive settlement character*
- *the pattern of distinctive landscape features, such as watercourses, woodland, trees and field boundaries, and their function as ecological corridors for dispersal of wildlife*
- *visually sensitive skylines, hillsides, seascapes, valley sides and geological features*
- *nocturnal character*
- *the setting of, and views from, Conservation Areas and Historic Parks and Gardens.*
- *the defined Setting of Sheringham Park, as shown on the Proposals Map.’*

The application has been supported by a Landscape and Visual Appraisal (LVIA) prepared by Sheilsflynn. This seeks to assess the landscape capacity and sensitivity with a view to providing a landscape strategy that enables the integration of the development into the landscape without detriment to the distinctive character and qualities of the local landscape. The LVIA draws upon relevant Topic Papers and guidelines, as well as North Norfolk’s Landscape Character Assessment, to make the assessment.

The LVIA identifies the key characteristics and sensitivities of the local landscape character and suggests that the character of Baconsthorpe’s landscape setting is stronger in some parts than others and that this strength of character can be enhanced by replanting lost hedgerows, hedgerow trees, arable reversion to pasture and the creation of copses and woods. The LVIA goes further to identify where the development provides opportunities to enhance locally distinctive features that are sensitive to the development. Overall the LVIA suggests that the development will have a minimal impact on the sensitive landscape elements and features but recommends a landscape strategy that can reinforce and enhance the existing landscape character.

The LVIA also assesses the visual sensitivity of the local area and the impact of the development proposals. Six viewpoints within the campsite itself are assessed as having moderate-high sensitivity with two viewpoints outside of the site assessed as having moderate visual sensitivity. Again, a landscape strategy is recommended which seeks to mitigate and screen some of the views within and of the campsite.

The Landscape Strategy is provided in full in Section 4 of the LVIA and details areas of

individual tree and shrub planting, new hedgerows and woodland copses. Native species are proposed in a mix of sizes from whips to standard trees with a failures replacement planting programme covering five years. Planting that was not implemented as part of the 2012 permission has been explained and supplemented as part of the Landscape Strategy.

The Landscape Officer considers that the LVIA provides a robust assessment of the impacts of the development on landscape character and visual receptors and consider that the development as proposed would have limited negative impacts on the local landscape character. Furthermore, that the landscape strategy as identified in the LVIA would enhance the landscape character.

Through the Landscape Strategy this development proposal would take the opportunities for enhancement and therefore meet the requirements of the NPPF paragraph 130.

Subject to the imposition of conditions to secure the implementation of the Landscape Strategy and conditions to secure retention of existing landscaping and new planting/replacements for a period of ten years, Officers consider that the development accords with the requirements of Core Strategy Policy EN 2.

## **6. Amenity**

Officers consider and recognise that mechanisms to secure adequate levels of residential amenity for the neighbouring residential properties are critical to the longer term success of this scheme. This includes consideration of how issues such as noise levels, traffic noise, smoke, overlooking, recreational activities outside allocated areas and unwanted antisocial behaviour in particular are managed by the site owner.

Notwithstanding the strength of concerns raised by the neighbours as a consequence of this proposal, the Environmental Health Section has confirmed that prior to this application there have been no recorded complaints, to the Environmental Protection Department.

Despite the increase in numbers proposed as part of this application, the actual physical distance between nearest effected neighbouring residential properties and proposed sites for campers to stay is increasing. At present 53 pitches can be located on the eastern field both north and south of the central access road, resulting in possible camping distances of 10 – 15 metres from the nearest effected residential neighbouring boundary. Officers recognise that there is a small section in the northern field that is not meant to be used for camping and which is proving difficult to enforce.

The proposed application, through the creation of two dedicated wildflower meadows, increases the distance to nearest neighbours to some 45 metres within the northern section of the existing field. The distance from the newly created campsite space in the western field is some 85 metres away from these nearby residential neighbouring properties.

Officers consider it reasonable to limit the number of pitches in both the existing eastern side of the site to 38 (44 including the camping pods). At present the number allowed is 53. Due to the smaller overall size of the western field it is considered reasonable to limit the number of pitches allowed to 25. Therefore, the proposed 63 tent pitches would be spread across a wider area and be further away from the immediate neighbouring properties than exists at present.

Officers consider that the proposed six camping pods to the very south east of the site would not significantly affect the residential amenity of the neighbouring properties due to the fact they are over 120 metres away from these properties.

There have been no objections from residents at Pitt Farm House. Nevertheless, if on site numbers are restricted to 38, as proposed on the eastern field, and 25 on the western field then the number of pitches on the existing eastern site would be some 9 less than what can be used at present, (taking into consideration the proposed camping pods also).

In the event of approval, Officers would recommend a condition be included limiting the numbers of campers in both the western and the eastern (existing fields) in the interest of residential amenity.

In respect of reducing adverse effects on residential amenity, some concerns have been raised about impacts from amplified music and barbeques associated with the camp site as well as general noise from campsite guests. Whilst the applicant states quite clearly on their business website that the site is a 'traditional campsite' with a 'No Noise after 10pm' policy, Officers considered that a site management plan can be secured by way of planning condition which would enable a clear understanding of the ways that the site owner will manage camping activities on the site so as protect residential amenity. To aid with this, the proposed sectioning off of the wild life meadows via fencing and hedging should ensure these wide areas are not used for sport or recreation.

Whilst not seeking to curtail the running of a successful campsite business, the final recommendation, based on discussions between Officers and Environmental Protection is to limit the overall number of people camping on site, together with the number of pitches, that this application allows for. Given the wide variety of tent sizes now readily available, if for example 63 ten-man tents were erected this could result in the total number of holiday makers on site up to 630 people (plus another 12 people using the proposed camping pods at 2 people per pod. Clearly this could have a significant and materially different impact on the area than a site with fewer guests. Officers consider a sensible and pragmatic approach would be to work on the basis of 4 people per tent per plot (4 x 63 = 252 **plus** 12 people using the six proposed camping pods at 2 people per pod) with a suggested site capacity of **264** campers on site at any one time.

This suggested limit does not necessarily prevent larger tents from being used but means that they cannot be used in large numbers across the site, particularly as larger groups can have an increased noise impact. This means that group sizes can be effectively managed by the applicant thus reducing the potential for unintended adverse impacts on the amenity of nearby residents.

As set out above, no formal complaints have been received by the Environmental Protection Team. Nonetheless with positive and proactive site management secured through a site management plan and by limiting the overall number of people camping on site, together with the number of pitches, the likelihood of increased noise and disturbance resulting from additional tent pitches will be reduced.

As such it is considered that the proposal would accord with Core Strategy Policies EN 4 and EN 13.

## **7. Highway Safety and Parking**

The site is located to the west of the village of Baconsthorpe. Visitors to the site from the Holt/A148 direction would likely use Hempstead Road, however, with the advent of satellite navigation systems in most newer cars, approaches from other directions cannot be ruled out. The Highway Authority have been consulted and consider that Hempstead Road is sufficiently wide for two vehicles to cross without difficulty. As such, the Highway Authority have raised no objection to the proposal.



It is considered that there are adequate parking facilities at the site for both visitors and holiday makers, many of whom would tend to park their vehicles next to the tents. Access to the newly created field in the western section of the site is via a grass track that is enclosed by hedge. No objection to this development is offered.

One area of contention for the nearby residents is the gravel drive that runs through the site. This is considered noisy from the neighbours perspective. Environmental Protection and the Highways Officer both have suggested either the removal of these stones or using a bound gravel surface. Due to cost implications it is not considered reasonable to request a bound gravel surface however, the removal of the stones to expose the hard surface below, appears the most sensible and cost effective method to maintain amenity levels for neighbours. This shall be recommended as a planning condition.

The applicant has agreed to reposition brown Tourist signs to the Campsite to use the Holt 'bypass road' south of the A148, before you reach Holt proper. The road is known locally as Heath Drive and although it is not officially opened yet, this is expected in the next 12 months. The road connects into the Hempstead Road to the south, avoiding the more residential stretch of Hempstead Road. The Highways Authority have agreed this proposal in principle, an informative will be added to encourage the fulfilment of this proposal, a condition is not considered appropriate as the proposal was not officially part of the application and the proposal could not be refused on these grounds alone.

Subject to the imposition of appropriate conditions it is considered that the proposal would accord with Core Strategy Policies CT 5 and CT 6.

## **8. Public Rights of Way**

Two Public Rights of Way (PRoW) are aligned within the site, Hempstead Footpath 14 and Hempstead Bridleway 11. The Public Rights of Way Officer has been consulted on this application and has raised no objections, albeit requesting that the full legal extent of these public Rights of Way must remain open and accessible for the duration of the development and subsequent occupation. This includes encroachment of screening vegetation, which must be planted back from the PRoW to allow for growth and to be maintained thereafter to maintain the legal widths. This is recommended to be conditioned as part of any approval.

The Open Spaces Society have objected to the proposal overall due to the negative impact they consider the campsite would have on persons using the public access routes. However, the use of the site for a campsite has been established and the modest increase in overall numbers on site and the associated buildings and infrastructure is considered entirely expected of such an established use. Overall Officers do not believe the appearance of the site would be incongruous within the country side setting, while overall the proposed planting is considered to enhance the setting of the site generally.

The Open Space Society recommended that the widths of the existing footpaths be widened as a result of this application. This goes beyond the request made by the Public Rights of Way Officer and Officers consider a request to widen these further could be considered unreasonable given the overall limited scale of growth being put forward by the proposal.

Subject to the imposition of conditions suggested by the PRoW Officer, it is considered that the proposal would accord with Core Strategy Policy CT 5.

## **9. Design**

It is recognised that the general nature of a camping site is such that the pitching of tents should not in itself having a long term or lasting effect on the character and appearance of the area. However, during busy periods, areas for the erection of tents will become more noticeable in the landscape. In this case, the applicant is proposing significant landscape planting designed to lessen the impact of camping activities in the wider landscape, which is welcomed.

There are a number of more permanent structures on site including the children's play area, new camping pods, wardens office, toilet block and shower & washing block and electrical hook up points.

There are no objections to the Children's Play equipment, this is limited in size and scope and to be expected on a campsite of this nature. Furthermore, the electrical hook up points are similarly of limited impact being non illuminated and discrete in appearance and very much the norm on modern day campsites.

Whilst the toilet block and shower & washing block are very utilitarian in appearance made up from various portable buildings, they are nonetheless painted a recessive dark green colour which helps in blending in. It is recognised that the campsite needs these facilities to attract paying guests. The units already installed appear to be well maintained.

Similarly, the campsite block/wardens lodge is relatively basic and utilitarian but is unlikely to be considered harmful to the wider landscape or the amenity of the area.

The proposed camping pods are limited in number and are located near to the existing buildings. Therefore, notwithstanding their rather unusual appearance, they would only be modestly sized structures with a localised impact which would be primarily confined to views from the adjacent rights of way.

With regards to the enlargement of the campsite in the western field, this would be reserved for tents only and would not feature any pods, lodges or any other permanent structures. Consequently, out of season, the character of this field would be largely unaffected by the development. Furthermore, the additional landscaping across the site would further ameliorate the impact during opening times, which is already to some extent contained and compartmentalised due to previous successful landscape planted associated with the 2012 permission.

On balance, whilst a number of neighbouring residents have raised concerns regarding the design and appearance of the buildings and features on site, these structures are all considered to be relatively temporary in nature and therefore reversible.

Subject to the imposition of appropriate conditions (including landscaping and control of lighting), the proposal would accord with Core Strategy Policy EN 4.

## **10. Impact on Heritage Assets**

When considering the impact on heritage assets, the Committee is advised to take account of advice within Core Strategy Policy EN 8 (Protecting and Enhancing the Historic Environment) together with the advice contained in the National Planning Policy Framework Section 16 - Conserving and enhancing the historic environment, in particular paragraphs 193, 194, 196 and 197.

In making its decision the Committee needs also to have regard to its duties under the Planning (Listed Buildings and Conservation Areas) Act 1990 including Section 72 (Conservation Areas - special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area).

A small section of the site comprising the proposed campsite parking area on the eastern boundary falls within the Baconsthorpe Conservation Area. The Conservation Area extends eastwards from the application site encompassing the historic barns at Pitt Farm with the main bulk of the conservation area further east primarily comprising development on and between The Street and School Lane in the centre of Baconsthorpe village.

The area of the site falling within Baconsthorpe Conservation Area is designated primarily because of the existence of the historic buildings at Pitt Farm. The main range of buildings has permission to be converted to six dwellings and is or was in the same ownership as the campsite when granted permission. Whilst Committee are required to give special attention to the desirability of preserving or enhancing the character or appearance of Baconsthorpe Conservation Area, it is considered that the harm arising from the proposed campsite car park would amount to less than substantial harm, particularly having regard to the existence of the modern steel-framed agricultural buildings to the north and east of the car park. Only modest public benefits would be needed to outweigh this harm.

Outside of but adjacent to the conservation area, whilst the external appearance of the proposed campsite toilet block and shower and washing block and wardens large are simple and rather basic in design, they are all temporary in nature and easily reversible. Whilst they do result in some harm to the setting of the conservation area, this is considered to amount to less than substantial harm and again, only modest public benefits would be needed to outweigh this harm.

The public benefits of the proposal include the positive contribution that the site makes to the tourism economy of the area. It is considered that these public benefits outweigh the very modest harm arising to the Baconsthorpe Conservation Area. As such it is considered that the proposal accords with the requirements of Development Plan Policy and Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

## **11. Ecology**

Whilst a Habitat and Protected Species survey has not been submitted with the application, the proposal does not involve the removal of vegetation or trees and actually propose an enhancement of the landscaping on site resulting in a net gain in ecology overall. The Landscape Officer does not object to the proposal on ecology grounds subject to the enhancement works being carried out as proposed.

Subject to the imposition of appropriate conditions, the proposal would accord with Core Strategy Policy EN 9.

## **12. Drainage**

Whilst the site is over 1 hectare in size, the Lead Local Flooding Authority have not commented on the application given the site is not within a surface water flow path as defined the Environment Agency. Officers are generally content that the ground conditions are acceptable to use soakaways to dispose of surface water.

In respect of foul water, both the Environmental Health Section and the Environment Agency have confirmed that the current septic tank on site is too small to operate under the proposed enlarged numbers. In the event of approval of this application, a 'Grampian' style planning condition is recommended so that, before more than 53 pitches are allowed, the applicant can demonstrate that an enlarged drainage facility capable of dealing with 264+ people in attendance across 69 pitches has been installed in accordance with approved details. Effectively this shall result in the applicant not being able to implement the approval until such time as a drainage strategy has been submitted to and implemented in full to the satisfaction of both the Environment Agency and the Environmental Health Department.

The numbers of toilets and showers on site is considered acceptable by Officers for an expansion of this size.

The Environment Agency's state that all public campsites must have a Foul Water Discharge permit in place. This is an entirely separate piece of independent legislation to Planning regulations. It is understood that the host site has operated without such a permit since they first opened but have now applied for this licence and this is nearly ready to be issued according to the Environment Agency themselves who saw no problems with the current capacity and arrangements.

Subject to the imposition of conditions as set out above, the proposal would accord with Core Strategy Policies EN 10 and EN 13.

### **13. Material Considerations in favour of the proposal**

In support of their proposal, the applicant has stated that the proposed enlargement is for those few times during the year where there is high demand requiring a larger number of pitches.

The applicant states that a single part-time job shall be created as a result of this proposal in addition to the existing full time job created by the original permission. Further employment opportunities in the tourism sector are welcomed in accordance with the aims of Core Strategy Policy SS 5.

The National Planning Policy Framework supports the economic case towards building a strong competitive economy. Paragraph 80 encourages businesses to expand and adapt, while Paragraph 83 specifically considers the rural economy. Indeed, paragraph 83 is focused on 'sustainable growth' while Paragraph 84 is concerned with development that is 'sensitive to its surroundings'.

This proposal fulfils these aims of the NPPF and act as further material considerations in support of the proposal from an economic and social perspective.

### **Conclusion**

This application seeks a modest extension to the number of camping pitches at the site from 53 to 63 together with the provision of six camping pods as well as a range of site facilities including a children's play area, wardens office, toilet block and shower & washing block and electrical hook up points.

In addition, the proposal includes a range of landscape and ecology enhancements which act to help reduce the impact of the proposal on the wider landscape.

Whilst it is recognised that the warden's office, toilet block and shower & washing block are of utilitarian appearance, on balance it is considered that with the imposition of appropriate conditions, the proposal would accord with the aims of Core Strategy policies and would strengthen the tourism offer in this part of the District.

**RECOMMENDATION:**

**Delegated Authority to the Head of Planning to approve the proposal subject to imposition of the following condition topics:**

- 1. Time Limit**
- 2. In accordance with approved Plans**
- 3. Tents only (no caravans or camper vans)**
- 4. Total number of people on site limited to 264**
- 5. No more than 25 pitches in the Western field and 38 in the Eastern field**
- 6. Western field shall be for tents only no additional buildings or structures.**
- 7. Land south of the 'Modern Barn' set out on the Site Plan 18/042/05/D shall not be included within the campsite area and shall not be used for camping purposes.**
- 8. Submission of Site Management Plan**
- 9. No commencement until adequate drainage details are submitted**
- 10. Landscaping Implemented as stated**
- 11. Any landscape that dies or fails in 10 years from the start of the permission, replanted**
- 12. No obstruction of the vehicular access**
- 13. Any additional external lighting to be agreed in advance**
- 14. Full details of any mechanical extractor system to be agreed in advance**
- 15. Details of refuse disposal to be submitted prior to the commencement of the development**
- 16. External materials of the Camping Pods to be agreed**
- 17. Remove the stones from the access road**
- 18. Public Right of Way must stay open and clear of vegetation and no planting within 1 metre of these accesses.**

**and any other conditions considered necessary by the Head of Planning.**

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**EAST BECKHAM - PF/19/1009 - Variation of condition 3 of planning permission PF/15/1486 (a variation of PF/13/0772 for Installation of a 10.15mw solar development) to extend the maximum operational lifetime of the solar farm from 25 years to 40 years; Solar Farm, Church Road, West Beckham, Holt, NR25 6NX for Hall Solar Ltd**

## **Major Development**

**- Target Date: 18 September 2019**

Case Officer: Mr G Lyon

Full Planning Permission

## **CONSTRAINTS**

Countryside

Landscape Character Type: Tributary Farmland (TF1)

SFRA - Detailed River Network

SFRA - Risk of Flooding from Surface Water + CC

Public Right of Way

EA Risk of Flooding from Surface Water 1 in 100

EA Risk of Flooding from Surface Water 1 in 1000

Adjacent site:

Mineral & Waste ALLOCATED Sites

Mineral Waste and Wastewater Safeguard Sites

Mineral Safeguard Area

East Beckham Hall (Grade II Listed)

## **RELEVANT PLANNING HISTORY**

PF/13/0772 PF

land at Hall Farm, East Beckham

Installation of a 10.15mw solar development

Approved 23/09/2013

NMA1/13/0772 NMA

Land at Hall Farm, East Beckham

Non material amendment request to permit revisions to alignment of access tracks, positions and appearance of electricity infrastructure, panel arrangement, security fence design and change of capacity of solar farm

Approved 16/12/2013

PF/15/1486 PF

Land at Hall Farm, East Beckham, HOLT, NR11 8GA

Variation of conditions 2, 10 and 18 of planning permission ref: PF/13/0772 to permit additional lights, to remove the scrapes and amend site layout

Approved 22/01/2016

## **THE APPLICATION**

Seeks permission to extend the permitted life of the solar farm from 25 years from first export date of electricity (permitted till 29 March 2039) to 40 years from first export date of electricity (till 29 March 2054).

No other physical works are proposed.

The Applicant has included a Planning Supporting Statement.

### **REASONS FOR REFERRAL TO COMMITTEE**

The Council's Constitution currently requires applications for ground mounted solar panels to be determined by the Development Committee.

### **PARISH/TOWN COUNCIL**

Beckham East/West Parish Council - Supports the Proposal

Upper Sheringham Parish Council - Supports the Proposal

Gresham Parish Council - No Objection

### **REPRESENTATIONS**

No Representations have been received.

### **CONSULTATIONS**

Norfolk Coast Partnership - Supports the Proposal

Landscape Officer - No Objection

### **HUMAN RIGHTS IMPLICATIONS**

It is considered that the proposed development may raise issues relevant to

Article 8: The Right to respect for private and family life.

Article 1 of the First Protocol: The right to peaceful enjoyment of possessions.

Having considered the likely impact on an individual's Human Rights, and the general interest of the public, approval of this application as recommended is considered to be justified, proportionate and in accordance with planning law.

### **CRIME AND DISORDER ACT 1998 - SECTION 17**

The application raises no significant crime and disorder issues.

### **POLICIES**

North Norfolk Core Strategy (Adopted September 2008):

Policy SS2: Development in the Countryside (*prevents general development in the countryside with specific exceptions*).

Policy SS 4: Environment (*strategic approach to environmental issues*).

Policy EN 2: Protection and enhancement of landscape and settlement character (*specifies criteria that proposals should have regard to, including the Landscape Character Assessment*).

Policy EN 4: Design (*specifies criteria that proposals should have regard to, including the North Norfolk Design Guide and sustainable construction*).

Policy EN 7: Renewable energy (*specifies criteria for renewable energy proposals*).

Policy EN 8: Protecting and enhancing the historic environment (*prevents insensitive development and specifies requirements relating to designated assets and other valuable buildings*).

Policy EN 9: Biodiversity and geology (*requires no adverse impact on designated nature conservation sites*).

Policy EN 10: Flood risk (*prevents inappropriate development in flood risk areas*).

National Planning Policy Framework (2019):

Section 2 – Achieving sustainable development

Section 4 – Decision-making

Section 14 - Meeting the challenge of climate change, flooding and coastal change



Section 15 - Conserving and enhancing the natural environment  
Section 16 - Conserving and enhancing the historic environment

## **MAIN ISSUES FOR CONSIDERATION**

- Principle of Development
- Effect on Landscape Character
- Effect on Heritage Assets
- Effect on Residential Amenity
- Effect on Ecology and Biodiversity
- Effect on Highway Safety
- Renewable Energy and Community Benefits
- Planning Obligations

## **APPRAISAL**

### **Principle of Development**

The site is situated in the countryside policy area where Core Strategy Policy SS 2 permits renewable energy projects which accord with other relevant Core Strategy policies including Policy EN 7 (Renewable Energy).

Permission has already been granted for a 10.15 MW solar farm at the site which has been implemented and first exported electricity on 29 March 2014. The solar farm was granted with a 25 year permission and therefore the principle of such development on this site has been established. A time limited permission was required to ensure that, at the end of its operational life, the solar panels and associated equipment are removed from the site by the landowner/applicant. This is a similar approach used for many renewable energy projects across the country.

The key issue to consider with this application is whether the proposal to increase the operational life of the solar farm by a further 15 years raises any additional planning matters including, amongst other things, those relating to landscape, heritage, residential amenity and ecology and biodiversity. Subject to these issues being favourably assessed, the principle of development would be considered acceptable. The grant of any permission would create an entirely new planning permission and so would be required to include all relevant planning conditions in addition to any amendments proposed to condition 3.

### **Effect on Landscape Character**

The site is located within the Landscape Character Type known as Tributary Farmland (TF1) which extends across a large central portion of the District. This landscape type is characterised by:

- Undulating terrain dissected by small river valleys with elevated, and occasionally expansive, open plateau areas;
- A rural landscape in which arable land use predominates with pasture more common around the edges of villages and in proximity to the river valleys;
- Hedgerows and mature hedgerow trees are frequent features within the landscape
- Woodland cover is locally prominent across the area in a variety of forms;
- Historic parks and estates are a distinctive feature of the Landscape Type;
- Settlement is typically rural villages with dispersed large houses and farmsteads in the wider landscape;

- A network of quiet rural lanes linking settlements; and
- Strong visual relationship between the valleys that dissect the landscape, the coast around Morston and the Wooded Glacial Ridge to the north

Having now been constructed, it is possible to get a sense of the visibility of the solar farm within the landscape. Set across two distinct areas, the eastern section of the solar farm has limited visibility in the landscape with limited fleeting views from the A149 near the junction with Holway Road into Sheringham. However, the western field is more prominent especially from the A148 to the north. Even so, the solar farm is a recessive colour and, at the distance from the A148, does not wholly detract from the character and appearance of the area. Both solar fields are visible from public footpaths running adjacent to the site. Whilst retaining the solar farm for an additional 15 years would retain the solar equipment on site and prevent alternative uses of the land, on balance, subject to ensuring that landscape mitigation planting is developing on site as set out within the approved Landscape and Ecological Mitigation Scheme and Landscape Management and Maintenance Plan, the proposal would be unlikely to give rise to significant adverse landscape impacts and would accord with the requirements of Core Strategy Policy EN 2.

### **Effect on Heritage Assets**

When considering the impact on historic assets, the Committee is advised to take account of advice within Core Strategy Policy EN 7 (Renewable Energy) and Policy EN 8 (Protecting and Enhancing the Historic Environment) together with the advice contained in the National Planning Policy Framework Section 16 - Conserving and enhancing the historic environment, in particular paragraphs 193, 194, 196 and 197.

In making its decision the Committee needs also to have regard to its duties under the Planning (Listed Buildings and Conservation Areas) Act 1990 including Section 66 (listed buildings - special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses) and Section 72 (Conservation Areas - special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area).

In assessing the original solar scheme (PF/13/0772) it was considered that the proposed solar farm would not harm the setting of the Grade II Listed entity that is East Beckham Hall. Although the solar farm would be visible from the Hall, views in this direction were considered to be intermittent and distant. It was considered that this separation distance, allied to the changes in topography, the intervening hedge lines and the existing farm buildings, would all ensure that the development would not affect the appreciation of the heritage asset within its rural setting. In the reverse direction, the solar panels would not impinge upon any of the existing views of the Hall complex from the public footpath to the north. Whilst they would form the backdrop to these views, it was considered that this co-existence would not in itself result in demonstrable harm being caused to the setting of the heritage asset. This assessment of heritage impacts still remains valid even though the panels would now be in situ for a further 15 years. As such it is considered that the proposal would accord with the requirements of Core Strategy Policy EN 8 and only very limited public benefits would be required under NPPF para 196 to outweigh the very limited harm identified by the proposal to the setting of East Beckham Hall.

### **Effect on Residential Amenity**

In respect of impact on residential amenity, the nearest properties to the site are located approximately 230m due north on the southern side of the A148 (six properties). Approximately 500m to the east is the Grade II listed Abbey Farm with a further nine properties due east of this.

To the south of the site lie approximately 40 residential properties along Church Road and The Street. These properties are in excess of 600m from the application site.

To the west of the site lie approximately 50 residential properties along Sheringham Road and Back Lane. These properties are in excess of 500m from the application site.

Whilst the proposed solar farm may be visible from some properties, given the distance between residential properties and the application site and having regard to the height of the panels, it is not considered that the proposal solar farm would in any way result in overbearing impacts of loss of daylight or sunlight. The panels are designed to absorb sunlight and therefore glare is not likely to occur from the panels themselves.

The proposal would therefore accord with Core Strategy Policy EN 4.

### **Effect on Ecology and Biodiversity**

Application ref: PF/13/0772 which established the original solar permission included a number of planning conditions relating to ecology and biodiversity. Conditions 6 and 7 of that permission relating to the submission and agreement of a Landscape and Ecological Mitigation Scheme and Landscape Management and Maintenance Plan. A Landscape and Ecological Mitigation Scheme and Landscape Management and Maintenance Plan (dated August 2014) produced by Richard Morrish Associates Ltd was approved and this set out periods for monitoring.

During the first year of implementation the applicant was to report on tasks and activities completed at the completion of sowing and planting works (winter 2014/2015), and then at completion of the first grazing season (October 2015). Reports were then to be subsequently submitted annually in October until 2020 and then biennially (every two years) until 2026 and then further reporting was to be agreed between the site operator and NNDC at that time. To date, one monitoring report has been received from the applicant in June 2015 and therefore additional monitoring reports are still awaited. As such, the Local Planning Authority cannot say with confidence that the objectives of the agreed Landscape and Ecological Mitigation Scheme and Landscape Management and Maintenance Plan are being met. Ultimately, this is matter for consideration as to the expediency of enforcement under the suitably worded condition imposed on the original planning permission.

Subject to demonstration by the applicant that the approved Landscape and Ecological Mitigation Scheme and Landscape Management and Maintenance Plan is meeting its stated aims or through the imposition of a planning condition to secure further biodiversity improvements on site through an updated Landscape and Ecological Mitigation Scheme and Landscape Management and Maintenance Plan with an additional monitoring period, the proposal would accord with Development Plan policy EN 9.

### **Effect on Highway Safety**

Whilst the solar farm generates some traffic movements during its operational life associated with management and maintenance, the primary highway impacts occurred when the solar farm was constructed with materials brought to site and associated construction traffic. Highway impacts will also occur at the end of its life at the decommissioning phase. The extension of the life of the permission by a further 15 years will increase the period of management and maintenance traffic but these would not give rise to significant highway objections. As such the proposal would accord with Development Plan policy.

### **Renewable Energy and Community Benefits**

In considering application PF/13/0772 (and subsequent application PF/15/1486), the applicants indicated that the proposed solar farm would generate approximately 7.8GWh (7,881,840KWh) of electricity per annum based on a stated capacity of the solar farm of approximately 9.84MW. It was predicted that the proposed solar farm would generate enough electricity to power approximately 1,671 homes annually, which was considered would make a significant contribution towards meeting national renewable energy targets, for which significant weight was attached in the decision making process.

Whilst it is understood that solar panel performance can reduce over time (most panels have a 25 year warranty to deliver at least 80% of their rated output over the life of the warranty), extending the life of the solar farm by a further 15 years will still enable the generation of a significant amount of renewable energy. The applicant has indicated a carbon saving of over 3,500 tonnes of carbon dioxide per annum as a result of the extended life. Continued use also negates the need to dispose of the panels before the end of the useful working life and this offers another benefit of delaying the generation of waste from decommission. In most cases solar panels can be recycled at the end of their life and are currently classed as e-waste in the Waste Electrical and Electronic Equipment (WEEE) Directive which requires solar cell manufacturers to fulfil specific legal requirements and recycling standards in order to make sure that solar panels do not become a burden to the environment.

In summary, extending the life of the solar farm would continue to make a significant contribution towards meeting national renewable energy targets, to which significant weight can be attached.

In terms of community benefits, the applicant has set out that a Community Benefit scheme is already in place with East & West Beckham in relation to the existing scheme and this would be extended further if permission is granted

Whilst these community benefit contributions are commendable and are undoubtedly welcomed by the local community, consideration has to be given as to whether the suggested Community fund complies with Government advice at paragraph 56 of the National Planning Policy Framework (the NPPF) and CIL Regulation 122 tests in respect that section 106 planning obligations "should only be sought where they meet all of the following tests:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development"

Officer advice would be that the Community fund cannot legally be considered as a material consideration in the determination of the application. Therefore, the Committee should not give any weight to the Community Fund when determining the application.

### **Summary**

Extending the life of the solar farm by an additional fifteen years is considered acceptable in principle and would continue to make a significant contribution towards meeting national renewable energy targets. The proposal will not result in any significant adverse incremental impacts to residential amenity, Subject to demonstration by the applicant that the approved Landscape and Ecological Mitigation Scheme and Landscape Management and Maintenance Plan for the site is meeting its stated aims or through the imposition of a planning condition to secure further biodiversity improvements on site through an updated Landscape and Ecological Mitigation Scheme and Landscape Management and Maintenance Plan with an additional monitoring period, the proposal would accord with Development Plan policy.

## **RECOMMENDATION:**

**Delegated Authority to the Head of Planning to approve the proposal subject to:**

- **subject to demonstration by the applicant that the approved Landscape and Ecological Mitigation Scheme and Landscape Management and Maintenance Plan for the site is meeting its stated aims or, in the event this is not possible within a reasonable timeframe, to include the imposition of a planning condition to secure further biodiversity improvements on site through an updated Landscape and Ecological Mitigation Scheme and Landscape Management and Maintenance Plan LEMP with an additional monitoring period and**
- **subject to imposition of the following condition topics:**
  - 1. 40 year permission till 29 March 2054;**
  - 2. No Closed Circuit Television (CCTV) other than that approved as part of condition 4 of PF/13/0772**
  - 3. In accordance with approved plans**
  - 4. Replacement planting if failed within 10 years of planting;**
  - 5. No external lighting;**
  - 6. No transformer installed on site to be audible above background noise levels beyond the boundaries of the site**

**and any other conditions considered necessary by the Head of Planning.**

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**RAYNHAM - PF/19/0893 - Variation of Condition 4 of application ref: PF/13/1166 (Installation of 49.9MW solar farm with plant housing and perimeter fence) to extend the operational lifetime of the development from a maximum of 30 years to 40 years.; Solar Farm, Blenheim Way, West Raynham, FAKENHAM, NR21 7PL for West Raynham Solar Limited**

## **Major Development**

**- Target Date: 28 August 2019**

Case Officer: Mr G Lyon

Full Planning Permission

## CONSTRAINTS

Countryside

Landscape Character Type: ROF1 (Rolling Open Farmland) Holkham to Raynham

Listed Building (Grade II) adjacent

Section 106 Planning Obligations

Contaminated Land

SFRA - Risk of Flooding from Surface Water + CC

EA Risk of Flooding from Surface Water 1 in 100

EA Risk of Flooding from Surface Water 1 in 1000

RELEVANT PLANNING HISTORY for Solar Farm, Blenheim Way, West Raynham, FAKENHAM, NR21 7PL

PF/13/1166 PF

Former Airfield, West Raynham

Installation of 49.9MW solar farm with plant housing and perimeter fence

Approved 16/01/2014

NMA1/13/1166 NMA

Former Airfield, West Raynham

Non material amendment request to permit the erection one cabin to house switch gear connection and one cabin to house communication/CCTV equipment.

Approved 17/07/2014

NMA2/13/1166 NMA

Former Airfield, West Raynham

Non material amendment request to permit alterations to road layout, arrangement of panels, increase in size of customer switchgear cabinet, fencing details and additional gated accesses

Approved 18/03/2015

PF/14/1572 PF

Former Airfield, West Raynham

Installation of pole mounted CCTV equipment

Approved 12/02/2015

PF/15/0324 PF

West Raynham Airfield, NR21 7AJ

Variation of condition 2 of planning application ref : 13/1166, to alter site boundaries and for new access route

Approved 01/06/2015

PF/16/1305 PF

West Raynham Airfield, West Raynham Solar Park, Fakenham NR21 7JP

Erection of two ancillary storage containers (part retrospective) and gravel access track

Approved 14/11/2016

### THE APPLICATION

Seeks permission to extend the permitted life of the solar farm from 30 years from first export date of electricity (permitted till 30 March 2045) to 40 years from first export date of electricity (till 30 March 2055).

No other physical works are proposed.

The Applicant has included a Planning Supporting Statement.

### REASONS FOR REFERRAL TO COMMITTEE

The Council's Constitution currently requires applications for ground mounted solar panels to be determined by the Development Committee.

### PARISH/TOWN COUNCIL

Helhoughton Parish Council - Supports the application

Raynham Parish Council - Do not object to the planning application but recommend the planting of wildflowers to help encourage more natural wildlife to the area that would be beneficial to the environment.

### REPRESENTATIONS

One representation has been received in support of the proposal. This representation states that the extension presents opportunities to improve biodiversity and heritage across the site.

### CONSULTATIONS

**Environmental Health** - Supports the proposal as there are no concerns or objections to the proposed variation on environmental health grounds.

**Conservation and Design Officer** - No objection subject to securing heritage funding through S106 Obligation to mitigate impacts.

Former RAF West Raynham was developed between 1937 and 1939 and is a rare example of a complete Second World War air base. As part of C&D's original assessment (see 2013 comments), it was concluded that the development would result in less than substantial harm to the setting of those designated and non-designated heritage assets within the base confines and minimal harm to the setting of those heritage assets further afield.

On the basis of a 10 year extension to the existing solar farm, this balanced assessment remains unchanged. That said, during the intervening period the site has been subject to a development brief process which took a holistic approach to the identification of those non-designated assets on the site in more detail.

In summary, the heritage assets affected now include:

- **The control tower** (grade II listed) – approx. 50m
- **Remains of the Bloodhound MK II missile launching pads** (non-designated heritage asset)
- **Rapier missile training dome** (non-designated heritage asset) – 166m
- **Officers Mess** (non-designated heritage asset) – 765m
- **Station Headquarters** (non-designated heritage asset) – 600m
- **Chapel** (non-designated heritage asset) – 570m



- **Hangers 1-4** (non-designated heritage asset) – 175m
- **Water Tower** (non-designated heritage asset) – 500m
- **Painswhin House** (grade II listed) – approx. 500m
- **Helhoughton Conservation Area** – approx. 1km North-East
- **Church of All Saints** (grade II\* listed) – approx. 1km North-East
- **Former Buck Public House** (grade II listed) – approx. 1km North-East
- **61 Buck Yard** (grade II listed) - approx 1km North-East
- **Raynham Park** (grade II registered park and garden) - approx. 1.2km East
- **Raynham Hall** (grade I listed) - approx. 1.2km East
- **Church of All Saints** (grade II\*listed) - approx. 1.2km East
- **West Raynham Conservation Area** - approx 1.3km East
- **Weasenham St Peter Conservation Area** - approx 1.6km South
- **Listed Church of St Peter** (grade II\* listed) - approx 1.7km South

Of the above list, the assets which are considered to be harmed by the development include:

- The Very Heavy Bomber Control Tower; this grade II listed building dates back to 1945 and is the landmark focal point of the former airfield. It's historic use and association with the land in question is of intrinsic significance to the interpretation of the asset and its setting.
- The Bloodhound MKII missile pads; the remains of these structures carry a close interrelationship to the airfield and its defence. Their position and relationship to the airfield is again intrinsically linked to their interpretation and former function.
- The Rapier missile training dome; this structure lies within close proximity to the solar farm with key views of the structure are punctuated by the backdrop of the solar panels.
- Hangers 1-4; these have a direct relationship to the airfield and enclose the former runway and run off. These structure overlook the solar farm.
- The Water Tower; this structure is one of the landmark features of the site as one of the tallest buildings. Direct views of the tower can be gained into and out of the solar farm.

As part of the 2013 Section 106 agreement, a 'heritage obligation' was set aside to secure the long term conservation of the then derelict control tower. Permission was subsequently secured in 2016 for the towers conversion and refurbishment. The external envelope has now been fully restored and work continues on the interior spaces. To this end, the original S106 funds have produced a tangible heritage legacy for the site and helped to secure the viability of a nationally significant structure.

In the event of the variation being agreed, a renewed heritage obligation should be secured to offset the continued harm caused to the heritage assets as outlined above. It is therefore recommended that another 13k should be contributed to the proper conservation and interpretation of the site through one or a combination of the following means:

- Contribution to the inception of a visitor hub/heritage interpretation centre;
- Feasibility study and assessment for the conversion and reuse of the remaining derelict heritage assets;
- Contribution to the preservation of the remaining derelict heritage assets;
- The creation of a heritage trail.

Overall, whilst the development will continue to result in less than substantial harm to the setting of those designated and non-designated heritage assets as identified above, the public benefit of the 49.9MW of electricity production to the national grid alongside any future heritage contribution would likely outweigh this harm. To this end, C&D raise no overriding objection to

the application subject to S106 heritage obligation agreement.

**Landscape Officer** - No objection subject to ensuring biodiversity enhancements secured as part of the extended Landscape and Ecology Management Plan (LEMP) are meeting their intended purpose otherwise an updated LEMP and extended monitoring period will be required so that biodiversity enhancements are delivered.

King's Lynn and West Norfolk Borough Council - No comments received  
Breckland District Council - No comments received

#### HUMAN RIGHTS IMPLICATIONS

It is considered that the proposed development may raise issues relevant to

Article 8: The Right to respect for private and family life.

Article 1 of the First Protocol: The right to peaceful enjoyment of possessions.

Having considered the likely impact on an individual's Human Rights, and the general interest of the public, approval of this application as recommended is considered to be justified, proportionate and in accordance with planning law.

#### CRIME AND DISORDER ACT 1998 - SECTION 17

The application raises no significant crime and disorder issues.

#### POLICIES

North Norfolk Core Strategy (Adopted September 2008):

Policy SS2: Development in the Countryside (*prevents general development in the countryside with specific exceptions*).

Policy SS 4: Environment (*strategic approach to environmental issues*).

Policy EN 2: Protection and enhancement of landscape and settlement character (*specifies criteria that proposals should have regard to, including the Landscape Character Assessment*).

Policy EN 4: Design (*specifies criteria that proposals should have regard to, including the North Norfolk Design Guide and sustainable construction*).

Policy EN 7: Renewable energy (*specifies criteria for renewable energy proposals*).

Policy EN 8: Protecting and enhancing the historic environment (*prevents insensitive development and specifies requirements relating to designated assets and other valuable buildings*).

Policy EN 9: Biodiversity and geology (*requires no adverse impact on designated nature conservation sites*).

Policy EN 10: Flood risk (*prevents inappropriate development in flood risk areas*).

National Planning Policy Framework (2019):

Section 2 – Achieving sustainable development

Section 4 – Decision-making

Section 14 - Meeting the challenge of climate change, flooding and coastal change

Section 15 - Conserving and enhancing the natural environment

Section 16 - Conserving and enhancing the historic environment

#### MAIN ISSUES FOR CONSIDERATION

- Principle of Development
- Effect on Landscape Character
- Effect on Heritage Assets

- Effect on Residential Amenity
- Effect on Ecology and Biodiversity
- Effect on Highway Safety
- Renewable Energy and Community Benefits
- Planning Obligations

## APPRAISAL

### **Principle of Development**

The site is situated in the countryside policy area where Core Strategy Policy SS 2 permits renewable energy projects which accord with other relevant Core Strategy policies including Policy EN 7 (Renewable Energy).

Permission has already been granted for a 49.9 MW solar farm at the former RAF West Raynham site which has been implemented and first exported electricity in March 2015. The solar farm was granted with a 30year permission and therefore the principle of such development on this site has been established. A time limited permission was required to ensure that, at the end of its operational life, the solar panels and associated equipment are removed from the site by the landowner/applicant. This is a similar approach used form many renewable energy projects across the country.

They key issue to consider with this application is whether the proposal to increase the operational life of the solar farm by a further 10 years raises any additional planning matters including, amongst other things, those relating to landscape, heritage, residential amenity and ecology and biodiversity. Subject to these issues being favourably assessed, the principle of development would be considered acceptable. The grant of any permission would create an entirely new planning permission and so would be required to include all relevant planning conditions in addition to any amendments proposed to condition 4.

### **Effect on Landscape Character**

The site is located within the Landscape Character Type known as ROF1 (Rolling Open Farmland) Holkham to Raynham within the most up to date Landscape Character Assessment. This landscape type is characterised by high level open, gently rolling arable farmland with relatively large, geometric fields enclosed by hedgerows. Many of the former airfield sites within this character type contain flatter plateau areas with the former RAF West Raynham site occupying an elevated position on top of the domed plateau. Both the elevated positon and domed plateau help to reduce the visual impact of the solar farm and limit wider views. Very little of the solar panels are generally visible. Where panels are visible, the domed plateau means that all of the site is not visible at any one time. This helps to reduce the wider impact of the proposal and was part of the reason why a 49.9MW solar farm was considered acceptable in this location when supported by the mitigating impacts of the proposed landscaping scheme. The retention of the solar farm for an additional ten years is unlikely to result in significant landscape harm. The proposal would be considered acceptable subject to continual management and maintenance of landscaping for the additional period.

### **Effect on Heritage Assets**

When considering the impact on historic assets, the Committee is advised to take account of advice within Core Strategy Policy EN 7 (Renewable Energy) and Policy EN 8 (Protecting and Enhancing the Historic Environment) together with the advice contained in the National Planning Policy Framework Section 16 - Conserving and enhancing the historic environment, in particular paragraphs 193, 194, 196 and 197.

In making its decision the Committee is advised to have regard to its duties under the Planning (Listed Buildings and Conservation Areas) Act 1990 including Section 66 (listed buildings - special regard to the desirability of preserving the building or its setting or any features of

special architectural or historic interest which it possesses) and Section 72 (Conservation Areas - special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area).

There are a number of heritage assets in the area identified by the Conservation & Design Officer including:

- The Very Heavy Bomber Control Tower; this grade II listed building dates back to 1945 and is the landmark focal point of the former airfield. It's historic use and association with the land in question is of intrinsic significance to the interpretation of the asset and its setting.
- The Bloodhound MKII missile pads; the remains of these structures carry a close interrelationship to the airfield and its defence. Their position and relationship to the airfield is again intrinsically linked to their interpretation and former function.
- The Rapier missile training dome; this structure lies within close proximity to the solar farm with key views of the structure are punctuated by the backdrop of the solar panels.
- Hangers 1-4; these have a direct relationship to the airfield and enclose the former runway and run off. These structure overlook the solar farm.
- The Water Tower; this structure is one of the landmark features of the site as one of the tallest buildings. Direct views of the tower can be gained into and out of the solar farm.

In considering the solar farm under planning ref: PF/13/1166, it was concluded that some adverse impacts would arise, particularly in relation to the setting of the grade II listed Very Heavy Bomber Control Tower. A financial contribution of £25,000 was secured from the applicant via a S106 obligation which was used to help make the control tower watertight with new windows and doors. These works have now been completed and the long term future of the control tower has been secured; thanks in part to the financial assistance of the original solar development. This, together with the public benefits of the solar farm in terms of significant generation of renewable energy where considered to outweigh the harm to the setting of the heritage asset over the then 30-year lifetime of the proposed development.

The application before Committee today seeks to extend the life of the development by a further 10 years and so the harm to the setting of the Very Heavy Bomber Control Tower will continue representing a 1/3 increase in lifespan of the development. In discussion with the applicant, agreement has been reached to provide additional heritage benefit funding so as to enable proper conservation and interpretation of the site through one or a combination of the following means:

- Contribution to the inception of a visitor hub/heritage interpretation centre;
- Feasibility study and assessment for the conversion and reuse of the remaining derelict heritage assets;
- Contribution to the preservation of the remaining derelict heritage assets; and
- The creation of a heritage trail.

A final sum of money is yet to be agreed but the figure recommended by the Council is **£13,000** based on a proportionate approach to the increase in length of time of the solar farm will remain on site with an uplift to take account of inflation since the original agreement S106 Obligation was made.

Whilst the retention of the solar farm for a further 10 year period for up to 40 years would continue to affect the setting of the Very Heavy Bomber Control Tower, subject to receipt of an appropriate sum of monies via a S106 Obligation to be used for heritage purposes within the former RAF West Raynham site, it is considered that the public benefits of the scheme in

terms of heritage contribution together with the renewable energy benefits would outweigh the identified harm to the setting of heritage assets.

### **Effect on Residential Amenity**

In respect of impact on residential amenity, the nearest residential properties are located approximately 75-100m away to the west of the site within a residential estate known as 'The Kiptons' (part of the former airbase). Between 'The Kiptons' housing estate and the airfield is a belt of trees approximately 13m wide and 158m long together with a recently planted orchard. Whilst it is likely that the solar panels and related development may be partly visible by residents within 'The Kiptons', it is considered that the solar farm would not result in any overbearing impacts or loss of daylight and sunlight and would not therefore have a significantly adverse effect on the amenity of the closest residents.

To the north west of the site is Paxfield Farm, approximately 200m away from the proposed solar farm. On the eastern boundary of Paxtons Farm is a maturing belt of trees/hedges which help screen the airfield from the farm. It is considered that the solar farm would not have a significantly adverse impact on the amenity of the residents of Paxfield Farm.

Other dwellings in the area include a group of 44 former 'Officer' dwellings located some 600m west of the proposed solar farm at 'The Orchard', Kipton Ash Farm, approximately 600m south together with a number of interspersed dwellings to the south west of the site.

A further 94 dwellings are proposed across 'The Kiptons' and 'The Orchard' site with the former RAF West Raynham site under planning ref: PF/17/0729. A resolution to approve this housing was made in April 2018 and is expected to be issued in due course once an associated S106 Obligation is completed.

Helhoughton village and West Raynham village are both approximately 1,100m east and north-east of the site.

There are approximately 7 residential properties along Low Street which forms the proposed access between the application site and the A1065 between Fakenham and Swaffham. These properties lie within the Parish of Weasenham St Peter (part of Breckland Council). The village of Weasenham St Peter lies approximately 1,600m south of the site.

Whilst the proposed solar farm may be visible from a small number of properties (including from new dwellings yet to be built), given the distance between residential properties; the application site and having regard to the height of the panels, it is not considered that the proposal solar farm would in any overbearing impacts or loss of daylight or sunlight. The panels are designed to absorb sunlight and therefore glare is not likely to occur from the panels themselves.

The retention of panels on site for a further 10-year period for up to 40 years would not result in unacceptable impacts on residential amenity and would comply with adopted Development Plan policy.

### **Effect on Ecology and Biodiversity**

Application ref: PF/13/1166 which established the original solar permission included a number of planning conditions relating to ecology and biodiversity. Condition 5 required the submission of a Landscape Ecological Management Plan and Condition 6 required a mitigation planting scheme. The applicant submitted a Landscape and Ecological Management Plan (LEMP) dated November 2014 prepared by MWA Ecological Consultants which satisfied the requirements of conditions 5 and 6. In addition to protection of habitats and wildlife during construction the approved LEMP included:

- Sowing of diverse grassland within the northern area of the solar farm;
- Sowing of seed at the Eastern Perimeter of the site;
- Planting of new hedgerows and trees;
- Structure Planting of Shrubs and Trees
- Infilling of Existing Hedgerows;
- Installation of Bat and Bird Boxes.

In terms of operation phase the LEMP set out:

- Grassland Management within the Array;
- Management of Injurious Weeds;
- Monitoring (including monitoring in years 1, 2, 3, 5 and 10)

The LEMP set out that monitoring reports will be supplied to the Local Planning Authority. To date these have not been supplied so it will be necessary to establish whether the intended aims of the LEMP have/are being met and, if the aims are not being met, that further biodiversity improvements are secured on site through an updated LEMP with an additional monitoring period.

Subject to demonstration by the applicant that the approved LEMP is meeting its stated aims or through the imposition of a planning condition to secure further biodiversity improvements on site through an updated LEMP with an additional monitoring period, the proposal would accord with Development Plan policy.

### **Effect on Highway Safety**

Whilst the solar farm generates some traffic movements during its operational life associated with management and maintenance, the primary highway impacts occurred when the solar farm was constructed with materials brought to site and associated construction traffic. Highway impacts will also occur at the end of its life at the decommissioning phase. The extension of the life of the permission by a further 10 years will increase the period of management and maintenance traffic but these incremental additions will not give rise to significant highway objections. As such the proposal would accord with Development Plan policy.

### **Renewable Energy and Community Benefits**

In considering application PF/13/1166, the applicants indicated that the proposed solar farm would generate approximately 48.153GWh (48,153,000KWh) of electricity per annum based on a stated capacity of the solar farm of approximately 49.9MW. This was predicted to generate enough electricity to power approximately 10,212 homes annually. It was considered that the solar farm would make significant contribution towards meeting national renewable energy targets, to which significant weight was attached.

Whilst it is understood that solar panel performance can reduce over time (most panels have a 25 year warranty to deliver at least 80% of their rated output over the life of the warranty), extending the life of the solar farm by a further 10 years will still enable the generation of a significant amount of renewable energy. The applicant has indicated a carbon saving of over 16,000 tonnes of carbon dioxide per annum as a result of the extended life. Continued use also negates the need to dispose of the panels before the end of the useful working life and this offers another benefit of delaying the generation of waste from decommission. In most cases solar panels can be recycled at the end of their life and are currently classed as e-waste in the Waste Electrical and Electronic Equipment (WEEE) Directive which requires solar cell manufacturers to fulfil specific legal requirements and recycling standards in order to make sure that solar panels do not become a burden to the environment.

In summary, extending the life of the solar farm would continue to make a significant contribution towards meeting national renewable energy targets, to which significant weight can be attached.

In terms of community benefits, it is the understanding of officers that an annual Community Fund of £25,000 is paid by the developer and that individual Community Fund Agreements are in place between the applicant and Helhoughton, West Raynham and Weasenham Parish Councils which provide up to £8,333.25 to each Parish annually. This is to be used for funding and promotion of any charitable or community projects and purposes within the Parish and for grants which offer opportunities to grass roots community groups and volunteers for the promotion and installation of energy efficient measures, small-scale renewable energy projects, or, other projects involving renewable energy, climate change and nature conservation within the Parish. The applicant has indicated that they will continue these payments for the additional lifetime of the development.

Whilst these community benefit contributions are commendable and are undoubtedly welcomed by the local community, consideration has to be given as to whether the suggested Community fund complies with Government advice at paragraph 56 of the National Planning Policy Framework (the NPPF) and CIL Regulation 122 tests in respect that section 106 planning obligations “should only be sought where they meet all of the following tests:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development”

The applicant for application PF/13/1166 previously indicated within their submitted application that they agreed that the Community fund cannot legally be considered as a material consideration in the determination of the application and this continues to be the case. Therefore, the Committee should not give any weight to the Community Fund when determining the application.

### **Summary**

Extending the life of the solar farm by an additional ten years is considered acceptable in principle and would continue to make a significant contribution towards meeting national renewable energy targets. The proposal will not result in any significant adverse incremental impacts to residential amenity, highway safety or unacceptable impacts to wider landscape character. Whilst harm to the setting of the Very Heavy Bomber Control Tower will continue for a longer period of time, the applicant has indicated a willingness to provide additional financial contributions to be used towards heritage assets at the former RAF West Raynham site which provide additional public benefits that weigh in favour of the proposal. Subject to demonstration by the applicant that the approved Landscape and Ecological Management Plan (LEMP) for the site is meeting its stated aims or through the imposition of a planning condition to secure further biodiversity improvements on site through an updated LEMP with an additional monitoring period, the proposal would accord with Development Plan policy.

### **RECOMMENDATION:**

**Delegated Authority to the Head of Planning to approve the proposal subject to:**

- the completion of a S106 Obligation or Unilateral Undertaking to secure an additional £13,000 heritage contribution to be used for the purposes set out above,
- subject to demonstration by the applicant that the approved Landscape and Ecological Management Plan (LEMP) for the site is meeting its stated aims or, in the

event this is not possible within a reasonable timeframe, to include the imposition of a planning condition to secure further biodiversity improvements on site through an updated LEMP with an additional monitoring period and

- subject to imposition of the following condition topics:
  1. 40 year permission till 30 March 2055
  1. In accordance with approved plans
  2. Replacement planting if failed within 10 years of planting;
  3. No external lighting;
  4. No transformer installed on site to be audible above background noise levels beyond the boundaries of the site

and any other conditions considered necessary by the Head of Planning.



**TRIMINGHAM - PF/18/2051 - Installation of 56 static holiday lodge bases, with associated access, services, veranda, car parking spaces and landscaping [Reconsultation - Amended Description and Additional Information 10/06/2019]; Woodland Holiday Park, Cromer Road, Trimingham, Norwich, NR11 8QJ for Woodland Holiday Park**

## **Major Development**

**- Target Date: 17 April 2019**

**- Extension of time agreed until 20 August 2019**

Case Officer: Nick Westlake

Full Planning Permission

## **RELEVANT CONSTRAINTS**

Countryside

Area of Outstanding Natural Beauty (AONB)

Agricultural Land Classification – Grade 3

EA Risk of Flooding from Surface Water (1 in 30, 1 in 100 and 1 in 1000)

Controlled Water Risk - Medium (Ground Water Pollution)

Mineral Safeguard Area

## **RELEVANT PLANNING HISTORY**

PLA/19741351 100 Static Caravans and 92 Touring Caravans. Approved 12/02/1975

PLA/19781485 54 Additional Static Caravans and 21 Touring Caravans. Approved 13/03/1979

PLA/19810619 Additional 25 Touring Caravans. Approved 11/05/1981

PLA/20061869 Siting of Sixteen Static Caravans to replace nineteen semi – static caravans. Approved 01/02/2007

PLA/20081543 Change of use of land from siting of fourteen semi – static caravans to siting of eleven static caravans. Approved 10/12/2008

PF/09/0803 Erection of 11 holiday lodges. Approved 27/10/2009

PF/13/0459 Use of land for siting 22 static caravans. Approved 27/09/2013

PF/11/0720 – Extension to provide additional touring caravan pitches. Approved 06/06/2011

PF/15/0073 – Installation of 50 static holiday lodge bases and associated landscaping and infrastructure. Approved 22/01/2015

PF17/0763 – Demolition of existing laundry & toilet block and redevelopment of site to provide 12no. holiday bedrooms with en-suite facilities; additional extensions to the complex to provide swimming pool changing area and spa facilities. Approved 30/06/2017

## **THE SITE AND ITS SURROUNDINGS**

The site, known as Woodlands Holiday Park (WHP) in Trimingham is located on the southern side of Cromer Road, approximately 0.6 miles in a southerly direction from the Norfolk coastline. There are 392 existing units on site

Overall, the site measures some 580 metres in width and 740 metres in depth and is broadly rectangular in nature. The total site measures 2.8 hectares in area and contains two (once arable) fields bounded by hedgerows and areas of deciduous woodland.

The Holiday park site contains a large established Caravan Park with existing complex containing a reception area, restaurant, games area, offices, and swimming pool. The site is surrounded by agricultural fields with the village of Trimingham approximately 200 metres to the east.

The proposed extension to the holiday park is located outside the current south eastern woodland boundary within open countryside, comprising two arable fields of comparable size. The proposed site forms a broadly rectangular shape, some 280 metres in width and between 100 and 130 metres in depth (approximately 3 hectares of land in total). The land is grade 3 agricultural land

The western field is known locally as 'Button Stores', the eastern field is known as 'Margate Hill'.

There is a rectangular area of woodland directly south of Margate Hill approximately 100 metres from the boundary of the existing site. This measures some 140 m x 80 m. The trees in this location are mature and well established. The topography of the land is one of generally rolling hills, Button Stores is located within a small valley between the host caravan park (west, north) and the external woodland area (east), this field is also on lower ground than Margate Hill.

## **PROPOSAL**

Seeks the change of use of approximately 3.0 hectares of grade 3 agricultural land to facilitate the extension of Woodlands Caravan Park via the construction of 56 static timber lodges. The proposal also includes associated services, access and landscaping including verandas on each Caravan plot.

In total 31 plots are proposed on the western land, known as Button Stores, with 25 plots proposed on the eastern land, known as Margate Hill.

The Caravans themselves are proposed to be some 12.5 metres long, 4.3 metres wide and 3.8 metres to ridge. All the caravans include a raised platform or veranda of approximately 5.5 metres wide and 6.6 metres long. The model type is known as 'Versailles', and they contain 2 bedrooms and 2 W.C facilities.

Since submitting the application, the applicant has provided a revised layout plan involving a reduction in the number of plots from 68 to 56. This revision also included amended Landscape Plans with additional tree planting most notably adjacent to the Pastons Way footpath within the Margate Hill eastern section of the site. The revision also included a 1.5 metre-high bund at the southern projection of western field, known as 'Button Stores', overlooking the agricultural fields and valley below.

Separate to these amended Landscaping Plans, the applicant provided a 'Further Information Report' dated May 2019. This focused largely on the Economic and Social positives of the proposal along with an assessment of alternative sites within the existing holiday park to accommodate this expansion. The revisions and additional supporting information was suggested by the case officer to help bring out the wider community benefits of the scheme.

## **REASONS FOR REFERRAL TO COMMITTEE**

At the request of the Local Ward Councillor Fitch-Tillett who supports the proposal and would like the Committee to consider the case being put forward by the applicant.

## **REPRESENTATIONS**

1 letter of objection has been received raising the following points:

- Excessive in size and scale in the AONB
- The landscaping proposed would not mitigate against the proposal
- Not a necessary development for the business survive.

## **CONSULTATIONS**

### **Minerals and Waste: No Objection**

While the site is underlain by a Mineral Safeguarding Area (Sand and Gravel), it is considered that as a result of the nature of the development it would not result in permanent sterilisation of the mineral resource. No objection to the proposed development on mineral safeguarding grounds.

### **Environmental Health: No Objection**

No objection to the application, subject to conditions on Foul Drainage, Sewage disposal, refuse storage and refuse recycling.

### **Public Rights of Way: No Objection**

No objection in principle to the application. However, the Norfolk Trail or 'Paston Way' runs close to the proposed site. As such there are concerns regarding the 'high negative impact' of the proposal on the visual amenity for walkers on the route.

The inclusion of additional landscape buffers will help to reduce the visual impact of the proposal in the long term, however there will be a 'high negative impact' in the meantime. If the planning authority is compelled to grant consent, a contribution should be sort in order to offset this loss in visual amenity. Such a contribution should go towards; Paston Way signage, surface improvements and provision of local information for the caravan park to identify the linear route and associated circular routes.

### **Norfolk Coast Partnership: Object**

Whilst there is a reduction in lodges the overall impact on the landscape and special features of the AONB will still be considerable. Mitigation through screening and enhancements will not be able to ensure that the development 'conserves and enhances' the AONB in line with NPPF para 172. Light pollution will impact on the special quality of the AONB

Sense of remoteness tranquillity and wildness. If approved a strict lighting condition should be attached.

**Open Spaces Society:** Object

Neither the proposed reduction in the overall number of lodges/units nor the proposed 'landscaping' measures would alter the over-riding fact that this proposal would result in an intrusion of the developed holiday park outside the established woodland envelope, into the undeveloped, open farmland of the AONB, and in very close proximity of and in prominent view of the designated Norfolk Trail ("Paston Way").

The proposed development of the fields to the south-west of Blackberry Hall would, notwithstanding the proposed 'landscaping' measures, pose an alien intrusion into the open countryside, with a significant detrimental impact upon the public's enjoyment of the public path, and the AONB.

**Economic Growth:** No Objection

An Economic Growth Officer has reviewed the application and it is recognised that there are potential economic benefits that would be derived by such a proposal which serve the wider business community within North Norfolk. Economic Growth therefore are keen to support this application. These comments reflect the economic impacts of this application and are without prejudice to others or matters of non-economic concern

**Highways:** No Objection

Given the type of proposal, the sites good access arrangement to the public highway and the recently reduced speed limit past the site; there is no objection.

**Anglian Water:** No Objection

Subject to conditions on drainage and water treatment condition.

**Lead Local Flooding Authority:** No Objection

No objection subject to a Surface Water Drainage Strategy/Layout condition.

**Landscape Officer:** Object

The reduction in the number of lodges and additional landscape planting and bunding will not alter the level of harm to the key characteristics of the AONB and landscape character, therefore the Landscape Section retain their position of objection to the development for the reasons as set out in their email dated 12th April 2019. The application should be refused under policies EN1, EN2 and EC10 of the Core Strategy.

The full objection from 12<sup>th</sup> April 2019 is included within **Appendix 1**.

**Campaign to Protect Rural England (CPRE):** Object

The imposition of 56 holiday lodges and their associated works would have a harmful impact on this designated 'countryside' area of the Norfolk Coast AONB. The proposed screening from planting and landscaping does not balance the harm from the loss of open countryside, the development harms views across the landscape and leading to harm to landscape quality.

**Ramblers Association: Object**

No preparation has been made for this extension to the Park by advanced planting of any screening trees or at least a hedge next to the footpath. For the proposed screening to be of any effect it will take at least 5 years, and that is just to hedge height.

The 31 “lodges” sited in the lower part of the application site may be screened enough already to be approved by the Council as long as the further screening also took place. However, we are opposed to this development in the half of the site nearest to Footpath 4.

**Trimingham Parish Council:** No Objection

**Gimingham Parish Council:** No Objection

The Parish Council have had concerns about the odour coming from the Anglian Water installations and would like some confirmation that this planning application is not going to increase the problem.

**RELEVANT POLICIES**

**North Norfolk Core Strategy and Development Control Policies (2008)**

- Policy SS2: Development in the Countryside (prevents general development in the countryside with specific exceptions).
- Policy SS 4: Environment (strategic approach to environmental issues).
- Policy SS 5: Economy (strategic approach to economic issues).
- Policy EN 1: Norfolk Coast Area of Outstanding Natural Beauty and The Broads (prevents developments which would be significantly detrimental to the areas and their setting).
- Policy EN 2: Protection and enhancement of landscape and settlement character (specifies criteria that proposals should have regard to, including the Landscape Character Assessment).
- Policy EN 3: Undeveloped Coast (prevents unnecessary development and specifies circumstances where development replacing that threatened by coastal erosion can be permitted).
- Policy EN 4: Design (specifies criteria that proposals should have regard to, including the North Norfolk Design Guide and sustainable construction).
- Policy EN 8: Protecting and enhancing the historic environment (prevents insensitive development and specifies requirements relating to designated assets and other valuable buildings).
- Policy EN 9: Biodiversity and geology (requires no adverse impact on designated nature conservation sites).
- Policy EN 10: Flood risk (prevents inappropriate development in flood risk areas).
- Policy EC 3: Extensions to existing businesses in the Countryside (prevents extensions of inappropriate scale and that would be detrimental to the character of the area).
- Policy EC 8: Retaining an adequate supply of mix tourist accommodation (specifies criteria to prevent loss of facilities).
- Policy EC 10: Static and touring caravans and camping sites (specifies criteria for new sites and extensions or intensification of existing sites).
- Policy CT 5: The transport impact on new development (specifies criteria to ensure reduction of need to travel and promotion of sustainable forms of transport).
- Policy CT 6: Parking provision (requires compliance with the Council's car parking standards other than in exceptional circumstances).

### **National Planning Policy Framework (NPPF):**

- Section 1 – Building a strong and competitive economy
- Section 3 – Supporting a prosperous rural economy
- Section 7 – Requiring good design
- Section 15 – Conserving and enhancing the natural environment

### **Other material considerations:**

- North Norfolk Design Guide Supplementary Planning Document (December 2008)
- National Planning Policy Framework, NPPF (2019)
- Local Planning Authority have published a new North Norfolk Landscape Character Assessment (November 2018) to provide an up-to-date evidence base for the emerging Local Plan. This document has been published in final form and represents the most up to-date and accurate assessment of the District, based on current best practice and in line with the requirements of the latest NPPF. Public consultation is expected to take place in May 2019, with adoption as a Supplementary Planning Document (SPD) in Autumn 2019. The document is available on the NNDC website and it is the view of the Local Planning Authority that the baseline environment needs to take account of this new resource to help inform the management of future change and to ensure consistency with the NPPF (including paragraphs 151 and 154).
- Norfolk Coast Area of Outstanding Natural Beauty, Management Strategy 2014 - 2019

### **OFFICER ASSESSMENT**

#### **Main Issues:**

1. Principle of development;
2. Extensions to Existing Businesses in the Countryside
3. Location of New Tourism Development
4. Static and Touring Caravan and Camping Sites
5. Impact on Landscape Character
6. Impact on the Norfolk Coast Area of Outstanding Natural Beauty (AONB)
7. Design
8. Lighting
9. Highways Safety and Parking
10. Public Rights of Way
11. Ecology
12. Drainage (including groundwater)
13. Amenity
14. Trees
15. Material Considerations in favour of the proposal

## 1. Principle of development

The site is located within the Countryside Policy area where Policy SS 2 permits recreation and tourism proposals as well as extension to existing businesses subject to compliance with other relevant Core Strategy policies. Those other relevant policies would include Policy SS 4 in relation to the protection of the environment, Policy SS 5 in relation to the Economy requiring tourism proposals to demonstrate that they will not have a significant detrimental effect on the environment, Policy EN 1 in relation to the Norfolk Coast AONB and Policy EN 2 in relation to landscape together with Policy EC 7 in relation to the location of new tourism development, Policy EC 3 in relation to extensions to existing businesses in the countryside and Policy EC 10 in relation to static and touring caravan and camping sites.

In terms of other material considerations, the National Planning Policy Framework (NPPF) indicates how Local Planning Authorities can support a prosperous rural economy including setting out at paragraph 83 that decisions *'should enable...sustainable rural tourism and leisure developments which respect the character of the countryside'*,

The existing Woodlands Holiday Park site and proposed extension are located within the Area of Outstanding Natural Beauty (AONB), where the NPPF Paragraph 172 states, *'Great weight should be given to conserving and enhancing landscape and scenic beauty in AONB's, which have the highest status of protection in relation to these issues'*. Paragraph 172 goes on to state *'...the scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest'*.

Assessment of the proposal against Core Strategy Policies and other relevant material considerations are set out below. Subject to the proposal according with these policies the principle of development would be considered acceptable. Where the proposal fails to accord with relevant Core Strategy policy it will be necessary to consider any other relevant material planning considerations in favour of the proposal to justify a departure from the Development Plan when making the planning balance.

## 2. Extensions to Existing Businesses in the Countryside

The existing Woodlands Holiday Park site is an established tourism business which makes a positive contribution to the local economy. The site has been expanded a number of times in the 1970s, 80s and more recently since 2006 with numerous extension proposals as set out in the planning history above. The site originally contained in the region of 100 static caravans and 92 touring caravans but now comprises a mixture of static caravans, touring caravans, holiday lodges and holiday bedrooms. The applicant sets out that the existing site capacity is 392 units of tourism accommodation which accords with the site license issued by the Council under the Caravan Sites & Control of Development Act 1960.

Core Strategy Policy EC 3 sets out that *'extensions to existing businesses in the countryside will be permitted where it is of a scale appropriate to the existing development and would not have a detrimental effect on the character of the area'*

The applicant in their planning supporting statement has indicated that in terms of numbers the proposal to add 56 units would amount to a 14% approximate increase whilst in terms of additional land area, the proposal amounts to an 11% increase in size of the site.

Whilst individually the proposed addition of 56 units can be seen to be relatively modest in comparison with the size of the existing site, cumulatively, the proposal will result in a site of

448 units of tourism accommodation. This is more than a doubling of the size/numbers of the original site as it stood in the early 1970s, at which point caravans were much smaller and mainly semi-static in nature. Even since 2006 the site has increased by over 100 units, a 35% increase. Extending the site to 448 units represents an increase of close to 55% since 2006.

It is a planning judgement as to whether the further extension to the site is of an appropriate scale. Officers consider that the acceptability of continued expansion under Policy EC 3 hinges not only on the scale of growth but also on whether the proposal has a detrimental effect on the character of the area.

Despite its size, the existing Woodlands Holiday Park is relatively well contained within the woodland setting. Even recent additions for 50 static units to the north approved in 2015 have been absorbed with the help of extensive and carefully managed planting secured through imposition of planning conditions. However, in this case the applicant is proposing to extend the woodlands holiday site to the south into more open landscape and where mitigation planting will do little to screen the site with mitigation planting expected to take 15 years to mature.

An assessment below considers the impact of the proposal on the wider landscape and the Norfolk Coast AONB. Officers consider that, despite mitigation planting, the proposal would be considered to have a detrimental effect on the character of the area for a considerable period of time until landscape planting matures. As such it can only be reasonably concluded that the proposal would have a detrimental effect on the character of the area and would fail to accord with the requirements of Core Strategy Policy EC 3.

### **3. Location of New Tourism Development**

Core Strategy Policy EC 7 sets out that:

*'New tourist accommodation and attractions should be located in accordance with the sequential approach below:*

- *Proposals for new build tourist accommodation and attractions should be located within the Principal and Secondary Settlements.*
- *Within the Service Villages, Coastal Service Villages and the Countryside proposals for new tourist accommodation and attractions will be permitted in accordance with other policies for Employment Areas, the Re-use of Buildings in the Countryside, and Extensions to Existing Businesses in the Countryside.*
- *Where it can be demonstrated that there are no sequentially preferable sites, no suitable buildings for re-use and that a rural location is necessary, then new build attractions and serviced accommodation may be permitted in the 'resorts and hinterland' and 'rural' Tourism Asset Zones of the Countryside where they are in close proximity and have good links to, the Principal and Secondary Settlements.*

*Proposals for new build unserviced holiday accommodation in the Countryside will be treated as though they are permanent residential dwellings and will not be permitted.'*

The countryside location of the site means that the proposal should be considered under the second bullet point within Policy EC 7. As such, the acceptability of the proposal under EC 7 is dependent upon whether the proposal accords with extension to businesses in the countryside under Policy EC 3. As set out above, the concern by Officers that the proposal



would be considered to have a detrimental effect on the character of the area for a considerable period of time until landscape planting matures means that the proposal would fail to accord with the requirements of Core Strategy Policy EN 3 and therefore also fail to meet the requirements of Core Strategy Policy EC 7. In relation to the third bullet point, the site is not located within the 'resorts and hinterland' or 'rural' tourism asset zones and neither is the site in close proximity and have good links to the Principal and Secondary Settlements.

The proposal therefore does not accord with the requirements of Core Strategy Policy EC 7.

#### **4. Static and Touring Caravan and Camping Sites**

Core Strategy Policy EC 10 sets out that:

*'Proposals for new static caravan sites or woodland lodge holiday accommodation will only be permitted where they result in:*

- *the removal of an existing cliff-top static caravan site; or*
- *the re-location of existing provision which is within the Coastal Erosion Constraint Area or Environment Agency Flood Risk Zone 3.*

*Proposals permitted under this exception should result in no significant intensification of the use and, if appropriate, comply with the criteria in Policy EN11 'Coastal Erosion'. Proposals should seek to re-locate to the 'rural' and 'resorts and hinterland' Tourism Asset Zones in preference to the 'coastal' or 'North Norfolk Broads' zones.*

***Extension of, or intensification of, existing static caravan sites (including replacement with woodland lodges) and touring caravan / camping sites will only be permitted where the proposal:***

- ***conclusively demonstrates a very high standard of design and landscaping and minimal adverse impact on its surroundings;***
- ***is appropriate when considered against the other policies of the plan.***

*New touring caravan and camping sites will not be permitted within the Norfolk Coast AONB, Undeveloped Coast or Environment Agency Flood Risk Zone 3. Elsewhere proposals will be judged against other Core Strategy policies. Temporary permission may be granted within the Coastal Erosion Constraint Area'.*

The proposal before Committee does not involve the removal of an existing cliff-top static caravan site nor does it result in the removal of existing provision within the Coastal Erosion Constraint Area or Environment Agency Flood Risk Zone 3.

The proposal represents an extension of an existing static caravan site and, whilst a matter of planning judgment, irrespective of whether the applicant can demonstrate a very high standard of design, as set out above and below it is the opinion of Officers that the applicant cannot conclusively demonstrate that the proposal would have minimal adverse impacts on its surroundings with a Landscape and Visual Impact Assessment concluding that the magnitude of the development will result in a high negative effect in the short and medium term. As such this is considered to be a significant material consideration for development within a nationally valued landscape, the Norfolk Coast AONB.

In addition, it has already been set out that the proposal fails to meet the requirements of Core Strategy Policies EC 3 and EC 7 and further policy assessment of landscape impact and

impact on the AONB are set out below which conclude that the proposal has harmful impacts.

As such it can only be reasonably concluded that the proposal would fail to accord with the requirements of Core Strategy Policy EC 10.

## 5. Impact on Landscape Character

Core Strategy Policy EN 2 sets out that:

*‘Proposals for development should be informed by, and be sympathetic to, the distinctive character areas identified in the North Norfolk Landscape Character Assessment and features identified in relevant settlement character studies.*

*Development proposals should demonstrate that their location, scale, design and materials will protect, conserve and, where possible, enhance:*

- *the special qualities and local distinctiveness of the area (including its historical, biodiversity and cultural character)*
- *gaps between settlements, and their landscape setting*
- *distinctive settlement character*
- *the pattern of distinctive landscape features, such as watercourses, woodland, trees and field boundaries, and their function as ecological corridors for dispersal of wildlife*
- *visually sensitive skylines, hillsides, seascapes, valley sides and geological features*
- *nocturnal character*
- *the setting of, and views from, Conservation Areas and Historic Parks and Gardens.*
- *the defined Setting of Sheringham Park, as shown on the Proposals Map.’*

The application site is located within two distinct landscape character types as set out in the draft North Norfolk Landscape Character Assessment (NNLCA - 2019). This document represents the most up-to-date and accurate assessment, based on current best practice to inform the management of future change in the landscape.

The site comprises:

- **Coastal Shelf (CS 1)** landscape character type which runs from Weybourne to Mundesley [eastern field - Margate Hill]; and;
- **River Valleys (RV 6 – Mundesley Beck)** landscape character type which runs from Northrepps to Mundesley [western field - Button stores]

The **Coastal Shelf (CS1)** covers a coastal strip of land, around 12 miles in length but only 1 mile deep. While some of the Districts principle settlements and historic holidays towns of Cromer, Sheringham, Overstrand and Mundesley are incorporated into the Coastal Shelf, the more undeveloped parts lie within the Norfolk Coast AONB. The valued features and qualities of CS1, in the updated North Norfolk LCA include the recreational opportunities provided by the network of footpaths, tracks and open access land; and the separate identity of coastal settlements, which provide a sense of place and historic and visual interest. The small areas

of arable farmland, woodland and other semi-natural habitats are important in providing visual separation, reinforcing a settlement's sense of place and setting. Furthermore, the updated LCA notes that the valued features and qualities of the Coastal Shelf are considered to contribute positively to the key qualities of the Norfolk Coast AONB, including the dynamic character and geomorphology of the coast, strong and distinctive links between land and sea, diversity and integrity of landscape, seascape and settlement character and the sense of remoteness, tranquillity and wildness.

The valued features and qualities of **River Valleys (RV 6 – Mundesley Beck)** include the intimate, contained rural character, where small field sizes combine to provide intimacy and a strong sense of place on the valley floor, with an overall character of a rural, wooded, enclosed, pastoral landscape. A further valued feature and quality is the variety of landscape elements and scenic views within the landscape, where visual perception changes rapidly from containment or partial containment on the valley floors (depending on the individual valley landform and degree of screening from woodland and/or hedgerows) to extensive views from valley crests.

The applicant has submitted a Landscape and Visual Impact Assessment October 2018 (LVIA) with this application. The purpose of an LVIA is to reduce the subjectivity in a landscape assessment and base this upon a defined methodology. The LVIA creates a base line position on the nature and character of the immediate area. Thus one is able to quantify the level of harm caused to the Landscape and the impacts mitigating measures would have over time. Indeed, critically the LVIA highlights how long landscaping mitigation measures would take until mature, to provide effective screening for the proposed development.

The context/baseline has been established by the applicant from a both a National Character Area profile and a locally established North Norfolk Landscape Character Assessment June 2009. However, the applicant's LVIA does not take into consideration the emerging, North Norfolk District Councils' Landscape Character Assessment 2018. As such there is a slight difference in 'baselines' between applicant's LVIA and the Landscape Officers assessment of the proposal that is ultimately a more up to date reflection. With this being said the broad content of the LVIA has been agreed by the Landscape Officer, although the conclusions reached in terms of actual harm caused differs, this is further discussed below.

The 'Paston Way' recreational footpath runs along the country lanes some 130 metres to the south of the host site. This makes the western field (Button stores) highly visible from various public views to the south and south west of the host site for pedestrians especially. The southern country lane that passes the site also is within Route 30 of the Norfolk cycle route.

The 'Paston Way' footpath, further east of the host site diverts across the agricultural buffer zone between the host site and the neighbouring more shielded country lanes and passed immediately adjacent to the south east corner of the proposed eastern site, (Margate Hill). Therefore, Margate Hill is especially visible from the public realm from the perspective of footpath users. Overall, the host site is extremely prominent in the local landscape, particularly for slower moving receptors such as pedestrians and cyclists. The applicant's LVIA suggests that the sensitivity of the whole site is very high, this being the highest sensitivity provided within the applicant's LVIA,

The applicant seeks to downplay the sensitivity of the site by suggesting a slightly degraded landscape. This opinion is not accepted by the Landscape Officer who is of the opinion that the site remains very high in terms of sensitivity for landscape receptors.

The timeframes given by the applicant to assess impacts of the proposal are divided into the short, medium and long term as below: (LVIA pg 26)

Short	1 -5 Years
Medium	5 -15 Years
Long	15 Years Plus

The applicant has stipulated a sensitivity of visual receptors scale ranging from: (LVIA pg 25)

Very High  
High  
Medium  
Low  
Negligible

While the Magnitude of Predicted Visual Effects range from: (LVIA pg27)

High Negative  
Medium Negative  
Low Negative  
Negligible  
None  
Low Positive  
Medium Positive  
Major High Positive

The applicant's LVIA explains the predicted visual effects of the development as **High Negative** in the short term. (LVIA pg 27) This is highest possible negative indicator on a scale given by the applicant. Once the mitigation measures are in place the applicant indicates this harm shall reduce to a **Low Negative** effect, however the LVIA acknowledges that it shall take 15 years for the planting to mature. (LVIA pg 26)

Officers concur with the LVIA's assessment that the development will have a **High Negative** effect prior to mitigation, but disagree with downgrading of the magnitude of effect on landscape receptors to low negative after mitigation. Officers consider that the positive effects of the development have been overstated and that the duration of the impact over the long term suggests that the magnitude should be, at least, **Medium Negative** as defined in Table 6 of the LVIA.

The LVIA states that the magnitude of the visual effect of the development will be 'high negative' in the short term, this is accepted but Officers suggest that the effects of the development will go beyond the short term into the medium term (at the very least) given the time taken for the mitigation planting to establish to be effective.

Based on the evidence submitted by the applicant together with the assessment of this information undertaken by the Landscape Officer, whilst some elements of the proposed development will introduce features that may enhance the landscape character in the long term, the short and medium term impacts will be significant. Furthermore, other elements of the development proposal will erode the landscape character and visual amenity. It is the view of the Landscape Officer that the proposed development cannot be readily accommodated within the landscape and requires significant and high level mitigation planting to reduce the effects over the long term.

Officers concur with the conclusions of the Landscape Officer and, as such, consider that the proposal does not accord with the requirements of Core Strategy Policy EN 2.

## 6. Impact on the Norfolk Coast Area of Outstanding Natural Beauty (AONB)

Core Strategy Policy EN 1 states:

*'The impact of individual proposals, and their cumulative effect, on the Norfolk Coast AONB, The Broads and their settings, will be carefully assessed. Development will be permitted where it;*

- is appropriate to the economic, social and environmental well-being of the area or is desirable for the understanding and enjoyment of the area;*
- does not detract from the special qualities of the Norfolk Coast AONB or The Broads; and*
- seeks to facilitate delivery of the Norfolk Coast AONB management plan objectives.*

*Opportunities for remediation and improvement of damaged landscapes will be taken as they arise.*

*Proposals that have an adverse effect will not be permitted unless it can be demonstrated that they cannot be located on alternative sites that would cause less harm and the benefits of the development clearly outweigh any adverse impacts.*

*Development proposals that would be significantly detrimental to the special qualities of the Norfolk Coast AONB or The Broads and their settings will not be permitted.'*

The key characteristics of the AONB are summarised in the 2014 - 2019 Norfolk Coast AONB Management Plan and include maintaining the diversity of character types and settlement pattern, and maintaining the sense of remoteness, tranquillity and wildness leading to dark night skies.

NPPF paragraph 172 makes very clear that *'Great weight should be given to conserving and enhancing landscape and scenic beauty in... Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues'*. It goes on to state that *'The scale and extent of development within these designated areas should be limited'*. Paragraph 172 sets out that *'other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.... Planning permission should be refused for major development.*

Footnote 55 within NPPF para 172 states. *'whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined'*

In light of the above assessment of the proposal on landscape character, it is considered that the development of a circa 3 Hectare site for the development of 56 static caravans amounts to **major development** in the Norfolk Coast AONB; i.e. it is a major development within the local context and wider district – not simply as defined as such by The General Development Procedure Order (2015)

NPPF para 172 concludes stating: *'Consideration of such applications should include an assessment of:*

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*

*b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*

*c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.'*

In considering the proposal against Core Strategy Policy EN1, Officers consider that the extension to the holiday park does not seek to facilitate delivery of the Norfolk Coast AONB management plan objectives. Furthermore, the Landscape Officer concludes that the proposal would detract from the special qualities of the Norfolk Coast AONB.

As to whether or not the proposal is considered 'appropriate to the economic, social and environmental well-being of the area or is desirable for the understanding and enjoyment of the area', officers consider that the existing Woodlands Holiday Park makes a positive contribution to the local economy. However, there is little compelling evidence before Officers to conclude that the development of 56 static caravans is 'desirable for the understanding and enjoyment of the area'. In fact, Officers consider the opposite is true when considering the visual impact of the proposal over the short to medium term affecting sensitive receptors such as walkers and cyclists.

Officers conclude the proposal would fail to accord with Core Strategy Policy EN 1.

In considering the requirements of NPPF para 172, tests a), b) and c) above are very similar to Core Strategy Policy EN 1 in seeking to consider any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

In terms of a) the proposal is not for national infrastructure or considered to be a scheme in the national interest. Whilst refusing the proposal will have some adverse impacts on the local economy, these have to be considered in terms of the effect that cumulative incremental adverse change can have within the Norfolk AONB in reducing the attractiveness of the area to tourists through continued unchecked growth.

In terms of b) whilst it is recognised that the applicant may not own tourism assets outside the Norfolk Coast AONB on which to further develop their tourism business, this is not in itself justification for continued expansion of the Woodlands Holiday Park site, especially where such expansion has adverse effects on the wider landscape. Officers are not aware that the applicant has considered meeting the need for tourism growth in another way without causing harm to the special qualities of the Norfolk Coast AONB.

In terms of c) whilst the applicant has sought to reduce the scale of the development this does not in itself alter the level of harm to the key characteristics of the AONB and landscape character identified by the Landscape Officer. Mitigation planting has been proposed but the time taken to reach maturity means High Negative effects will occur on the landscape and AONB in the short to medium term only reducing to Moderate Negative after 15 years of plant growth.

Officers therefore conclude that the proposal fails to accord with the requirements of NPPF para 172. The proposal is not in the public interest and there are no exceptional circumstances which could justify this major development within the Norfolk Coast AONB.

## 7. Design

The design and layout of the site is considered to be reasonably unregimented and organic in nature. The site affords a good level of planting across the site which helps to break up the rectangular nature of the access roads and Caravan plots, while softening the visual appearance of the scheme. The Caravans themselves are some 12.5 metres long, 4.3 metres wide and 3.8 metres to ridge. All the caravans include a raised platform or veranda of approximately 5.5 metres wide and 6.6 metres long. These are located at ends closest to the access roads, this helps reduce direct overlooking.

Each caravan is suitably well located so as to avoid the layout appearing cramped or overcrowded. In any event, caravan site license requirements dictate the minimum spacing between units. In terms of what is proposed, the static caravans are generally considered more recessive in appearance than touring caravans and tents for which no control over appearance could be readily achieved. The caravans are proposed to have a dark stain, similar in appearance to the recently approved Caravans at Buxton Piece. The applicant has provided details of the choice of the two external colour finishes to the caravans - brown and green. It is considered that, subject to conditioning the external colour finishes, the proposed units would appear generally recessive in the landscape, albeit still visible.

Enhanced planting is proposed around the site of between 15 and 25 metres in depth, however as discussed above this shall take significant time to come into effect to screen the development from wider views.

On balance, subject to the imposition of conditions, the proposal would accord with the key aims of Core Strategy EN 4.

## 8. Lighting

Low level bollard lighting of approximately 0.8 metres in height are proposed across the site. The plans suggest 12 bollard lights within the site which is considered to be an acceptable number. The lights are to be fitted with a PL9 low energy lamp, giving a low – level efficient spread of light.

Whilst the efforts by the applicant to reduce bollard lighting are welcomed, it has to be recognised that the addition of 56 holiday lodges/static caravans will generate a wider lighting impact associated with their use including light from the coming and going of vehicles. Mitigation planting will take 15 years before having any noticeable effect and this may not in itself serve to reduce the effect of lighting on dark skies. Officers consider the proposal will affect, in a detrimental way, one of the key objectives of the AONB Management Plan which is concerned with *'maintaining the sense of remoteness, tranquillity and wildness leading to dark night skies'*.

As such the proposal is considered to be contrary to the aims of Core Strategy Policies EN 13 and EN 1.

## 9. Highways Safety and Parking

In terms of access to the site from the main Cromer Road (C634), the site affords excellent visibility splays further aided by the recently reduced speed limit past the site.

Access within the site is considered acceptable. Each Caravan plot has space for at least two cars to park. This is considered to be a suitable level of parking provision assuming the units

have no more than three bedrooms

The Highway Authority have raised no objections to the proposal and Officers consider that the proposal accords with Core Strategy Policy CT5 and CT6.

## **10. Public Rights of Way**

The 'Paston Way' recreational footpath runs along the country lanes some 130 metres to the south of the application site and the Trimmingham Footpath 4 (FP4) runs close to the eastern boundary. Whilst there shall be no obstruction of the Public Rights of way as a result of this proposal, the application site, would be highly visible from these footpaths and surrounding routes, particularly for slower moving receptors such as pedestrians and cyclists.

Whilst mitigation landscaping is proposed by the applicant, Officers consider that the proposal is likely to lead to a significant deterioration in the visual enjoyment of the footpaths given the time frames involved in awaiting the landscaping to mature and offer any screening benefit.

If permission were to be granted for the proposal, the Public Rights of Way (PRoW) Officer has requested a 'significant' financial contribution be sought by way of S106 Obligation in order to offset the loss in visual amenity. Such a contribution should go towards; Paston Way signage, surface improvements and provision of local information for the caravan park to identify the linear route and associated circular routes. Whilst the actual sum to be requested by the PRoW Officer remains to be negotiated, this can be considered further in the event of an approval if Planning Committee members deem this request appropriate.

Subject to securing an appropriate contribution to offset the identified impact of the development, the application would accord with Core Strategy Policy CT 5.

## **11. Ecology**

A Habitat and Protected Species survey has been submitted with the application. The Landscape Officer is satisfied with the information submitted., In the event of approval it is recommended that a planning condition be imposed which ensures that the mitigation/compensation recommendations outlined within Section 4.3 of the applicant's Preliminary Ecological Appraisal (October 2018) are implemented in full.

Subject to securing an appropriate condition to offset the identified impact of the development, the application would accord with Core Strategy Policy EN9.

## **12. Drainage (including groundwater)**

The Lead Local Flood Authority (LLFA) have assessed the application in depth. The applicant provided a Flood Risk Assessment, a Drainage Strategy and also responded directly to the Local Planning Authority when concerns relating to the application originally were raised to some of the details provided. The applicant subsequently provided additional details to the Local Planning Authority that have also been reviewed by the LLFA. Ultimately, no objections to the proposal are offered, however the LLFA have suggested a series of conditions that ensure the safety of the prospective users of the site.

In relation to ground water impacts, the Flood Risk and Drainage Report concludes in paragraph 6.1 that the site is located within Flood zone 1 and therefore the proposed development will not be located within the fluvial flow path of any water watercourse and will not occupy any critical floodplain storage.



In the event of an approval to this application it is recommended that all the conditions suggested by the LLFA are included within the decision notice. Further to this the 'Maintenance Extracts' detailed in Appendix K of the Flood Risk and Drainage Assessment November 2018 are recommended to be conditioned as part of any approval.

Subject to the imposition of conditions, the proposal is considered to be in accordance with Core Strategy Policy EN 10.

### **13. Amenity**

Officers consider that the layout of the proposed Caravans on site is such that some close relationships between units is inevitable. However, the distances obtained between caravans and the locations of the veranda's associated with each plot is deemed adequate to mitigate against any significant loss of amenity to any of the plots within the proposed new layout arrangement. In any event the proposed units are for holiday purposes and not for occupation as a permanent residence. Therefore, some degree of relaxation of basic amenity criteria requirements is considered acceptable

Outside of the proposed site boundaries there is one dwelling known as Blackberry Hall Holiday Cottage that would be considered close enough to be possibly affected by the proposal. However, further investigations reveal this is not an independent residential dwellinghouse and the building is in fact run as a single holiday property with direct links to the Woodland Holiday Park site.

In any event, were this position to change and the property reverts back to single residential use, due the distances involved and the geography of the immediate area, this property is not considered to suffer from any significant loss of residential amenity as a result of the proposal.

As such it is considered that the proposal would accord with Core Strategy Policies EN 4 and EN 13.

### **14. Trees**

The applicant has submitted an Arboricultural Report from BH Trees and Woodlands, dated July 2018 which, amongst other things, confirms the location of root protection areas within the proposed development site.

The recommendations of the Arboricultural Report are that no construction activities should take place within the root protection areas, except as indicated in the method statement. The applicant's tree report then goes on to state, that based on the proposed tree constraints plan and recommended tree protection measures, the development can be accommodated on the site with minimal impacts on the arboricultural interests of the site. This conclusion is accepted by Officers and in the event of an approval the recommendations within the Arboricultural Report from BH Trees and Woodlands should be strictly followed.

Subject to the imposition of conditions the proposal would accord with relevant sections within Core Strategy Policies EN 2 and EN 9.

## **15. Material Considerations in favour of the proposal**

In support of their proposal, the applicant has set out their case to justify approval of the development.

The applicant has provided an updated 'Further Information Report' Dated May 2019 together with their original submission details. This report highlights the economic and social benefits of the application. The report also demonstrates that there is not an opportunity to cite any of the proposed static Caravans in other areas within the existing Holiday Park via a sequential assessment that looked at 5 different areas. Each alternative area was discounted due to reasons such as; the excessive number of trees present, ground that is not level, areas that are difficult to get services to or areas that are home to newly established planting that should not be disturbed.

The applicant has expressed that Caravans in more wooded areas are difficult to sell due to the fact they need constant cleaning, they are subject to tree debris and the inconvenience generally of being within a wooded environment.

With regards to the economic future of Woodlands Holiday Park (WHP), the applicant states they wish to make the destination a 'best in class'. The owners wish to see WHP as a premium designation within the district and beyond and to achieve this goal, the applicant considers that the site needs to expand. In recent times the applicant states there has been an 'unprecedented period of growth' at WHP hence they have recently upgraded the leisure facilities at cost of £1.3 million pounds, alongside the building of a new 12 bedroom hotel on site.

The reduction of numbers of proposed Caravans from 68 to 56 demonstrates that the applicant is willing to mitigate the concerns of the Local Planning Authority and other interested stake holders such as the Open Spaces Society, Ramblers Society, and the Campaign to protect Rural England who all object to the proposal. As a consequence of the reduced numbers proposed, the scale and visual impact of the proposed extension would be incrementally reduced. With regards job creation, the proposed development is considered to create between 7 to 10 full time jobs once the development is completed over the following 24 months. Other economic benefits of the proposal include the short term construction jobs and landscaping mitigation implementation measures. The owners of WHP are aiming to improve the job prospects for the workers on site. They have joined the Sector Skills Plan for Tourism, an initiative development through the Local Enterprise Partnership to achieve this goal. This a significant positive to the proposal, very much in line with policies SS5.

In terms of social and health benefits, the current membership of WHP is 1,458, of this number 824 are local residents of the area. It is clear that WHP is a very popular and valuable local resource that the District are fortunate to have. Those that benefit from the continued well run efficiency of the site are both holiday makers and the residents of North Norfolk more generally. Both groups have full use of the resources available on the site that includes a swimming pool and gym. The next nearest swimming pool or gym is some 8 miles away, thus the facilities are well located to serve the residents of Mundesley, Trimmingham, Southrepps, Northrepps and beyond.

The wider economic benefits of the proposal have also been outlined from the applicant. They have demonstrated that exponential growth of 10% per annum in the holiday lodge park sector is expected, according to Visit Britain Official findings. The applicant has also demonstrated that having additional visitors to the area results in a wider benefit to the Local Economy. The Visit Britain research shows that visitors who stay in rented or holiday park accommodation spend on average £557 per visit or £101 per day, staying on average 4.5 days on a holiday. Visitors staying in 'owned' accommodation spent on average £480 per visit or £89 per day,

staying on average 5.4 days. This being higher than the average daily spend by visitors to the UK at £63 per day on a 3.1 days per holiday stay. Many of the goods and services on which this money is spent shall be sourced locally. Again, this a compelling economic argument in support of the proposed development.

## Conclusions

In assessing the proposal to extend Woodlands Holiday Park with a further 56 static units, it is the view of Officers that, subject to the imposition of appropriate conditions the scheme would not give rise to adverse impacts in relation to matters of design, highway safety and parking, ecology, drainage, amenity and trees.

In relation to public rights of way, whilst harm will arise for users of the local network around the site, subject to a commuted sum towards Paston Way signage, surface improvements and provision of local information for the caravan park to identify the linear route and associated circular routes to offset the loss in visual amenity, the proposal would on balance be considered acceptable.

In terms of the key issues of principle, the site is considered to be a major development within the Norfolk Coast AONB which requires careful consideration of impacts including impacts on the special qualities of the AONB, assessment of public interest and justification of exceptional circumstances in support of the proposal.

The site has already seen significant expansion over the last 10 years and further extension of the site would extend into more open and visible landscape. It is the view of Officers that the proposed development cannot be readily accommodated within the landscape and requires significant and high level mitigation planting to reduce the effects over the long term.

The applicant has submitted a Landscape & Visual Impact Assessment (LVIA) which concludes that the proposed development will have a **High Negative** effect prior to mitigation. Officers suggest that the effects of the development will go beyond the short term into the medium term given the time taken for the mitigation planting to establish to be effective. Officers therefore consider this impact will only lessen to a **Medium Negative** effect once mitigation planting matures.

Officers consider that the identified harm to landscape character suggest that the proposal does not accord with the requirements of Core Strategy Policy EN 2.

In respect of the impact of the proposal on the Norfolk Coast AONB, Officers conclude that the proposal would harm the special qualities of the area including aims of maintaining the sense of remoteness, tranquillity and wildness leading to dark night skies. As such the proposal fails to accord with the requirements of Core Strategy Policy EN 1. Furthermore, the proposal also fails to accord with the advice of government set out in the National Planning Policy Framework at paragraph 172. The proposal is not in the public interest and there are no exceptional circumstances advanced by the applicant which could justify this major development within the Norfolk Coast AONB in the form proposed.

In light of the above it is the opinion of Officers that it can only be reasonably concluded that the proposal would have a detrimental effect on the character of the area and would fail to accord with the requirements of Core Strategy Policy EC 3 in relation to existing businesses in the countryside.

In terms of the location of new tourism development, the failure to comply with the requirements of Core Strategy Policy EC 3 also suggests the proposal cannot be considered favourably under Core Strategy Policy EC 7.

The proposal represents an extension of an existing static caravan site and, whilst a matter of planning judgment, irrespective of whether the applicant can demonstrate a very high standard of design, as set out above it is the opinion of Officers that the applicant cannot conclusively demonstrate that the proposal would have minimal adverse impacts on its surroundings. The proposal would therefore fail to comply with the requirements of Core Strategy Policy EC 10.

In respect of the impact of lighting, Officers consider that the proposal will affect, in a detrimental way, one of the key objectives of the AONB Management Plan which is concerned with *'maintaining the sense of remoteness, tranquillity and wildness leading to dark night skies'*. As such the proposal is considered to be contrary to the aims of Core Strategy Policies EN 13 and EN 1.

In weighing material considerations in favour of the proposal, Officers have afforded significant weight to the economic benefits of the proposal through development of a 'best in class' destination which contributes positively to the local economy and generates employment opportunities. Significant weight has also been afforded to the sites continued provision of local leisure facilities including a swimming pool and gym which the proposed development will help to continue to support.

Whilst these material considerations attract significant weight in favour of the proposal, the sites location within the Norfolk Coast AONB means that great weight should be given to conserving and enhancing landscape and scenic beauty in the area. Whilst the proposed expansion of the site delivers economic growth as stated above, it does so at the expense of the landscape and scenic beauty of the area and, notwithstanding the mitigation measures to be put in place by the applicant, the proposal would lead to longer term unacceptable impacts on the special qualities of the area, qualities that underpin the very reason why tourists value this part of the District and which underpins the need for careful managed growth so as to not to kill the goose that lays the golden egg.

Officer recommendation is therefore one of refusal as set out below

## **RECOMMENDATION:**

### **Refuse planning permission on the following grounds:**

The District Council adopted the North Norfolk Core Strategy on 24 September 2008, and subsequently adopted Policy HO9 on 23 February 2011, for all planning purposes. The following policy statements are considered relevant to the proposed development:

- EC 3 - Extensions to existing businesses in the Countryside
- EC 7 - The location of new tourism development
- EC 10 - Static and touring caravan and camping sites
- EN 1 - Norfolk Coast Area of Outstanding Natural Beauty and The Broads
- EN 2 - Protection and enhancement of landscape and settlement character
- EN 13 - Pollution and hazard prevention and minimisation

National Planning Policy Framework Paragraphs 84 and 172

In the opinion of the Local Planning Authority the proposal represents major development in the Norfolk Coast AONB which cannot be readily accommodated within the landscape and requires significant and high level mitigation planting to reduce the effects over the long term. The proposed development will have a High Negative effect at inception, with those effects

then going beyond the short term into the medium term, as time is taken for mitigation planting to establish to be effective. As such it is considered that the development will only lessen to a Medium Negative effect once mitigation planting matures. The identified harm to landscape character suggest that the proposal does not accord with the requirements of Core Strategy Policy EN 2.

In respect of the impact of the proposal on the Norfolk Coast AONB, it is considered that the proposal would harm the special qualities of the area including aims of maintaining the sense of remoteness, tranquillity and wildness leading to dark night skies. As such the proposal fails to accord with the requirements of Core Strategy Policy EN 1. Furthermore, the proposal also fails to accord with the advice of government set out in the National Planning Policy Framework at paragraph 172. The proposal is not in the public interest and there are no exceptional circumstances advanced by the applicant which could justify this major development within the Norfolk Coast AONB in the form proposed.

In light of the above conclusions it can only be reasonably concluded that the proposal would have a detrimental effect on the character of the area and would fail to accord with the requirements of Core Strategy Policy EC 3 in relation to existing businesses in the countryside.

In terms of the location of new tourism development, the failure to comply with the requirements of Core Strategy Policy EC 3 also suggests the proposal cannot be considered favourably under Core Strategy Policy EC 7.

The proposal represents an extension of an existing static caravan site and, whilst a matter of planning judgment, irrespective of whether the applicant can demonstrate a very high standard of design, as set out above it is considered that the applicant cannot conclusively demonstrate that the proposal would have minimal adverse impacts on its surroundings. The proposal would therefore fail to comply with the requirements of Core Strategy Policy EC 10.

In respect of the impact of lighting, it is considered that the proposal will affect, in a detrimental way, one of the key objectives of the AONB Management Plan which is concerned with *'maintaining the sense of remoteness, tranquillity and wildness leading to dark night skies'*. As such the proposal is considered to be contrary to the aims of Core Strategy Policies EN 13 and EN 1.

The material considerations of economic growth, job creation, qualitative enhancement of facilities, and sequential site selection advanced in favour of the proposal to justify approval as a departure from Development Plan policy, are not considered to outweigh the impacts identified above.

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**From:** [Nick Westlake](#)  
**To:** [Linda Yarham](#)  
**Subject:** FW: PF/18/2051 - Woodlands Holiday Park, Cromer Road, Trimmingham - Landscape Comments  
**Date:** 05 August 2019 12:56:23  
**Importance:** High

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## **2<sup>nd</sup> Response 04/06/2019**

Further to the receipt of amended documents for the above application, the following additional comments are given.

In Section 3.2 of the Additional Information statement received from Parker Planning Services (PPS) in regard to the area of dispute over the assessment of the impact of the proposals in the LVIA, PPS suggests that this is a “subjective matter and open to interpretation”. This is incorrect as the purpose of an LVIA is reduce the subjectivity in landscape assessment and base this upon defined methodology. The Landscape Section’s assessment of the impact of the development as *moderate* is based on the applicant’s own methodology as defined in the LVIA, therefore the Landscape Section remain committed that the magnitude of the development will result in a *high* negative effect in the short and medium term. As such this is a significant material consideration for development within a nationally valued landscape, the AONB.

The reduction in the number of lodges and additional landscape planting and bunding will not alter the level of harm to the key characteristics of the AONB and landscape character, therefore the Landscape Section retain their position of objection to the development for the reasons as set out in their email dated 12<sup>th</sup> April 2019.

The application should be refused under policies EN1, EN2 and EC10 of the Core Strategy.

**Nick Westlake**  
Senior Planning Officer  
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## **1<sup>st</sup> Response 12/04/2019**

Comments were provided by the Landscape Section regarding development proposals for Woodland’s Caravan Park site in the pre-application enquiry ref. DE21/17/0153, which included

a proposed extension to the south of the existing Holiday Park for lodge style caravans. Some of these observations remain pertinent to this current planning application.

Subsequent to the pre-application enquiry, the Local Planning Authority have published a new North Norfolk Landscape Character Assessment (November 2018) to provide an up-to-date evidence base for the emerging Local Plan. This document has been published in final form and represents the most up-to-date and accurate assessment of the District, based on current best practice and in line with the requirements of the latest NPPF. Public consultation is expected to take place in May 2019, with adoption as a Supplementary Planning Document (SPD) in Autumn 2019. The document is available on the NNDC website and it is the view of the Local Planning Authority that the baseline environment needs to take account of this new resource to help inform the management of future change and to ensure consistency with the NPPF (including paragraphs 151 and 154).

As requested in the pre-application enquiry response, a Landscape and Visual Impact Appraisal (LVIA) has been submitted as part of the application. This will be referred to in the assessment of the application, however it should be noted that the LVIA does not take account of the most up to date LCA mentioned above and where discrepancies arise these will be noted.

As stated in the Landscape Section's pre-application enquiry response the development site is located within the Norfolk Coast AONB, with policy EN1 of the Core Strategy relevant. This policy aims to ensure that development does not detract from the special qualities of the AONB. Furthermore, the policy states that *"proposals that have an adverse effect on the Norfolk Coast AONB will not be permitted unless it can be demonstrated that they cannot be located on alternative sites that would cause less harm and the benefits of the development clearly outweigh any adverse impacts"*.

Also of significant note is paragraph 172 of the NPPF, this states that great weight should be given to conserving landscape and scenic beauty in AONBs, which have the highest status of protection in relation to these issues. The Landscape Section note that within the submitted LVIA (in section 3.2 National Planning Policy) when referring to national policies relating to the development the document fails to mention paragraph 172 which deals specifically with development within the AONB.

The key characteristics of the AONB are summarised in the 2014 - 2019 Norfolk Coast AONB Management Plan and include maintaining the diversity of character types and settlement pattern, and maintaining the sense of remoteness, tranquillity and wildness leading to dark night skies.

National Planning Policy Guidance states that one of the core principles of the NPPF is that planning should recognise the intrinsic character and beauty of the countryside (Para. 001 Ref. ID:8-001-20140306). Furthermore, national guidance states that planning permission should be refused for major development in AONBs except in exceptional circumstances and where it can be demonstrated to be in the public interest (note: *major development* is to be defined by the decision taker) (Para. 005 Ref. ID: 8-005-20140306).

An assessment of the development proposed within the application with respect to the impact on the Norfolk Coast AONB and landscape character will be given by the Landscape Section in



view of national and local policy requirements:

#### Context/baseline situation

The National Character Area profiles prepared by Natural England and described in the LVIA provide a useful baseline on the unique character areas of the Country. The development site is located within National Character Area 78: Central North Norfolk. The area is defined as a predominantly tranquil place and an ancient countryside with a long-settled agricultural character where arable land is enclosed by winding lanes and hedgerows, interspersed with woodland and remnant heath and dissected by lush pastoral river valleys. The profile states that the main pressures for change to the area are posed by growth and a need to accommodate increased development, as well as managing ongoing visitor pressures in coastal areas. The Landscape Section consider that the development site accords well with the national character area description.

At a local level the development site is located within the boundaries of two distinct 'Character Areas'. As stated in the submitted LVIA, the site is located within both the *Mun Valley (SV6)* area and the *Sidestrand to Mundesley Coastal Town and Villages (CTV3)* area (according to the previous North Norfolk Landscape Character Assessment June 2009). While the boundaries for the character areas remain the same in the most up to date LCA (in the context of where they intersect with the development site) the character areas have been reclassified and redefined in the updated LCA (November 2018) and are now defined as *River Valleys*, of which the site is within the *Mundesley Beck Valley (RV6)* character area and the *Coastal Shelf* character area, of which there is one, the *Weybourne to Mundesley Coastal Shelf (CS1)*. It should also be noted that the boundaries of the *River Valley* character areas are blurred and should be read in context with the neighbouring landscape type.

In the baseline assessment of the landscape character, the submitted LVIA refers to the 2009 LCA which concluded that the landscape is moderately sensitive to change and would benefit from proposals to restore landscape features (pages 17 to 18). In the updated North Norfolk LCA the valued features and qualities of RV6 *Mundesley Beck* include the intimate, contained rural character, where small field sizes combine to provide intimacy and a strong sense of place on the valley floor, with an overall character of a rural, wooded, enclosed, pastoral landscape. A further valued feature and quality is the variety of landscape elements and scenic views within the landscape, where visual perception changes rapidly from containment or partial containment on the valley floors (depending on the individual valley landform and degree of screening from woodland and/or hedgerows) to extensive views from valley crests.

The CS1 (*Weybourne to Mundesley Coastal Shelf*) character area covers a coastal strip of land, around 12 miles in length but only 1 mile deep. While some of the Districts principle settlements and historic holiday towns of Cromer, Sheringham, Overstrand and Mundesley are incorporated into the Coastal Shelf, the more undeveloped parts lie within the Norfolk Coast AONB. The valued features and qualities of CS1, in the updated North Norfolk LCA include the recreational opportunities provided by the network of footpaths, tracks and open access land; and the separate identity of coastal settlements, which provide a sense of place and historic and visual interest. The small areas of arable farmland, woodland and other semi-natural habitats are important in providing visual separation, reinforcing a settlement's sense of place and setting. Furthermore, the updated LCA notes that the valued features and qualities of the *Coastal Shelf* are considered to contribute positively to the key qualities of the Norfolk Coast

AONB, including the dynamic character and geomorphology of the coast, strong and distinctive links between land and sea, diversity and integrity of landscape, seascape and settlement character and the sense of remoteness, tranquillity and wildness.

While it is noted that the LVIA baseline assessment of the development site is based on the now superseded LCA, the Landscape Section concur with the assessment that the Woodland Holiday Park as a whole provides a “*positive contribution to the character of the area*” as defined in Table 1 of the LVIA. The LVIA goes further to conclude that the development proposal would provide a “*relatively positive contribution to the landscape of the Mun Valley*” (page 19), however the Landscape Section dispute this as this judgement has not been properly justified in the LVIA. Some elements of the development, such as the provision of woodland planting, may contribute positively to the landscape character however that is at the cost of the more considerable impact of the woodland style lodges and bases, verandas, roadways and lighting on the landscape.

In the baseline assessment of the existing visual amenity, the LVIA concludes that the site provides *good* (as defined in Table 2) visual amenity within the near to mid distance views. The LVIA recognises the development site is viewed from local footpaths on the Paston Way and from quiet lanes to the south within the Mun valley. The Landscape Section concur with this assessment.

In terms of landscape quality, while recognising the value of the landscape at a national level in terms of its designation as an Area of Outstanding Natural Beauty, the LVIA considers at a local level the quality of the landscape to be “*good/high*” (as defined in Table 3). The Landscape Section note that the definition of a *high* quality landscape in Table 3 includes designated landscapes such as the AONB, but disagree with the LIVA assessment that the existence of detracting features (quoted as being the relatively modern housing units, industrial estates and the Woodlands Holiday Park itself) make the area slightly less susceptible to change. The definitions of *good* and *high* quality landscapes include landscapes that are intact or mostly intact, therefore it is unclear how the LVIA has concluded that the “*area as a whole is moderately able to accommodate change without serious negative effect*”?

#### National Policy

The Landscape Section consider that, as a starting principle, the proposed development (installation of 68 static holiday lodges and associated infrastructure) is unacceptable given that it is major development within the AONB and cannot be defined as an exceptional circumstance. However, further consideration is given to para. 172 of the NPPF which, when considering applications for development in the AONB, requires an assessment of *inter alia* any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

In the assessment of the effects on the development on landscape receptors, the LVIA suggests that while the site is important (and has a *high* sensitivity) the location of the development site within the wider context of the AONB and “*wholly intact areas*”, makes the site relatively less sensitive to development. The LVIA has previously acknowledged in the baseline assessment of the site that it is in a *good* to *high* quality landscape, which by its own definition includes landscapes that are intact or mostly intact. Furthermore, the most up to date LCA states that the valued features and qualities of the local landscape character areas are considered to contribute

positively to the key qualities of the AONB. The Landscape Section considers that the landscape elements of the site positively contribute to the AONB, incorporate key qualities of the AONB and can be considered intact and therefore the sensitivity of the site should not be reduced within the assessment.

The Landscape Section suggest that the landscape elements and valued the features identified in the updated LCA, such as the variety of landscape elements and scenic views within the landscape and the recreational opportunities provided by the network of footpaths, will be adversely affected by the development, by the detracting visual elements of the scheme and disagrees with the LVIA assessment that the proposed development is relatively “*low impact*” and “*would not be thought to be damaging to the surrounding landscape receptors*”.

The Landscape Section concur with the LVIA’s assessment that the development will have a *major negative* effect in the context of the AONB prior to mitigation, but disagree with downgrading of the magnitude of effect on landscape receptors to *minor* after mitigation. The Landscape Section consider that the positive effects of the development have been overstated and that the duration of the impact over the long term suggests that the magnitude should be, at least, *moderate* as defined in Table 6 of the LVIA.

The LVIA states that the magnitude of the visual effect of the development will be *high negative* in the short term and the Landscape Section concur with this assessment but suggest that the effects of the development will go beyond the short term into the medium term (at the very least) given the time taken for the mitigation planting to establish to be effective.

With regards to para. 172 of the NPPF, the development will have a detrimental effect on the AONB and local landscape character and visual amenity, which is acknowledged in the submitted LVIA. Furthermore, the negative impact on *highly* sensitive users (recreational cyclists and ramblers) of the network of public rights of way will be *very high* in the short to medium term, although it is acknowledged that this will reduce over time. Therefore there will be an impact on the recreational opportunities in the area. The Landscape Section acknowledge the attempts to design and mitigate the impacts of the development down to an acceptable level, however it is considered that the mitigation is insufficient, and will take too long to establish, to outweigh the harm to the landscape. Therefore, having taken into consideration the great weight that should be afforded to conserving landscape and scenic beauty in the AONB, the Landscape Section conclude that the development would be contrary to national policy.

#### Local Policy (EN1/EN2/EC10)

The Landscape Section have highlighted why it considers that the development will have a detrimental impact on the AONB, including the key qualities, resulting in an adverse effect in the AONB. This too is acknowledged in the submitted LVIA. As such the development does not meet with the requirements of policy EN1 of the Council’s Core Strategy.

Where harm has been established, policy EN1 requires the application to demonstrate that it cannot be located on alternative sites that would cause less harm and the benefits of the development outweigh any adverse impacts. The LVIA includes a sequential testing of alternative proposal sites including referencing an assessment carried out by CJ Yardley as part of previous proposals for additional holiday accommodation development at the site. In the LVIA it states that all of the sites assessed as part of the CJ Yardley Sequential Test (April 2013) have

negative effects on the landscape. Out of the three sites in the 2013 assessment, Site 1 was considered to be the least sensitive to development and was subsequently developed and Site 2 and 3 were dismissed in the LVIA as being unsuitable for the development due to the high amenity, biodiversity and landscape character value. Site 3 is the subject of this application.

While the sequential test in the LVIA considered development within the existing areas of woodland in the current caravan park, these were mainly dismissed due to economic viability issues rather than landscape issues. However, the topography of the site was stated as a key limiting factor in dismissing the potential to incorporate the proposals into the existing Holiday Park site, suggesting large numbers of trees would need to be removed to create level areas. However, development of 11 timber holiday lodges within the existing woodland was approved in 2009 (planning ref. 09/0803), which was located on the sloping valley side, within existing woodland and did not necessitate the removal of significant numbers of trees, thus proving that it may be possible to site some number of lodges within the existing site.

With regard to the benefits of the development, the Landscape Section recognise that Woodlands Holiday Park is an important tourist facility and business in the area providing both employment and tourist accommodation, however the site has seen continued growth and expansion over several decades. The Landscape Section are concerned that moves to address the holiday market through the growth of the existing site is unsustainable with the landscape having limited capacity to absorb additional growth. Opportunities for employment and tourist accommodation in the District can be provided in less sensitive locations.

Policy EN2 requires development proposals to demonstrate that their location, scale, design and materials will protect, conserve and where possible enhance the distinctive landscape character of the District as informed by the LCA. As noted previously, while the Landscape Section acknowledge that some elements of the development will introduce features that may enhance the landscape character in the long term, the short and medium term impacts will be significant. Furthermore, other elements of the development proposal will erode the landscape character and visual amenity.

In the updated LCA, the overall vision for the *Mundesley Beck* character area (RV1) is an intimate and small scale landscape, where new development is appropriate in scale, unobtrusive and readily accommodated into its landscape setting. This development cannot be readily accommodated within the landscape (resulting in a *major negative* effect in the landscape and AONB as acknowledged in the LVIA) and requires significant and high level mitigation planting to reduce the effects over the long term. While woodlands and hedgerows are a major landscape element in the vision for the character area, and can be used to limit the visual influence of development, the use of such landscape planting to justify the adverse impacts of the development cannot be substantiated.

On balance, the Landscape Section consider that the development does not meet with the requirements of policy EN2.

Policy EC10 of the Core Strategy does not permit new sites within the AONB, and the extension or intensification of existing sites will only be permitted where there is a very high standard of design and landscaping, with minimal adverse impact on its surroundings, and when the proposal accords with other Core Strategy policies. As has been demonstrated the development

will have an adverse effect on the AONB and landscape character and does not provide adequate mitigation to reduce the effects to an acceptable level in an acceptable timeframe and does not therefore accord with local and national policies.

#### Arboriculture

An Arboricultural Report has been submitted with the application that states that no trees are identified for removal at this stage, however this is caveated by the expression that some trees may be required to be removed to improve access into the site. The report concludes by stating that no construction activities should take place within the RPAs except as indicated in an agreed method statement and suggests that the development can be accommodated on the site with minimal impacts on the trees.

Given that the development requires level changes, underground utilities and hard surfacing it is not clear why the development proposals have not been accurately assessed as part of the Arboricultural Report, and plotted on a Tree Protection Plan, to gain a greater level of understanding of the impact on the important trees surrounding the site. There remains a degree of uncertainty as to the impact of the development on trees surrounding the site.

#### Ecology

A Preliminary Ecological Appraisal Report has been submitted with the application. This suggests that the principle impact of the development on ecological receptors is at the site-level. The hedgerows on the site have been assessed as being a habitat of principle importance under the NERC Act, however in general the habitats within the development footprint are common and widespread. A number of trees are considered to support Potential Roost Features for bats and the hedgerows are considered to provide suitable foraging and commuting habitat for bats.

Standard mitigation and enhancement measures for bats and other wildlife are recommended.

The plans appear to illustrate that the woodland lodges will be constructed very close to the woodland edges, reducing the favourability of this habitat for foraging and commuting bats. The lodges should be moved further away from the woodland edge to maintain a buffer strip for commuting and foraging bats.

#### Conclusions

Having considered the benefits of the development, the Landscape section does not consider that these elements outweigh the landscape and visual impact of a large number of woodland style lodges and associated infrastructure in the AONB and the *River Valleys* and *Coastal Shelf* character areas.

The Landscape section concludes that the proposals are contrary to EN1, EN2 and EC10 of the Core Strategy as well as not complying with national policy.

The development proposal is therefore recommended for refusal.

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**FAKENHAM - PF/19/0729 - Detached cartshed and store to front of property; 21 Jubilee Avenue, Fakenham, NR21 8DG for Mr & Mrs Anthony**

**Target Date: 15 August 2019**

Case Officer: Bruno Fraga da Costa

Householder application

## **CONSTRAINTS**

LDF - Settlement Boundary

LDF - Residential Area

Contaminated Land

## **RELEVANT PLANNING HISTORY**

None.

## **THE APPLICATION**

Is for the erection of a detached cartshed style car port and store to the front of the house.

## **REASONS FOR REFERRAL TO COMMITTEE**

At the request of Cllr. Jeremy Punchard, on the grounds of planning precedent in the area, the structure itself not being attached to the main dwelling and, with the addition of conditions, the building is considered to be acceptable.

## **PARISH/TOWN COUNCIL**

Fakenham Town Council – no objection and no comment.

## **REPRESENTATIONS**

None received.

## **CONSULTATIONS**

Environmental Health - No objection and advise there is little risk of any issues relating to contamination. An advisory note relating to potential contamination being found is requested.

## **HUMAN RIGHTS IMPLICATIONS**

It is considered that the proposed development may raise issues relevant to

Article 8: The Right to respect for private and family life.

Article 1 of the First Protocol: The right to peaceful enjoyment of possessions.

Having considered the likely impact on an individual's Human Rights, and the general interest of the public, approval of this application as recommended is considered to be justified, proportionate and in accordance with planning law.

## **CRIME AND DISORDER ACT 1998 - SECTION 17**

The application raises no significant crime and disorder issues.

## **POLICIES**

**National Planning Policy Framework (NPPF):**

Section 12 – Achieving well-designed places: paragraph 130

**North Norfolk Core Strategy Policies:**

SS 1 – Spatial Strategy for North Norfolk

SS 3 – Housing

EN 4 – Design

EN 13 – Pollution and Hazard Prevention and Minimisation

CT 6 – Parking Provision

## **MAIN ISSUES FOR CONSIDERATION**

- Principle
- Design
- Amenity
- Highways
- Environmental Considerations

### **APPRAISAL**

Principle: SS 1; SS 3

The site is within the settlement boundary of Fakenham, which is defined as a Principal Settlement under Policy SS 1 of the adopted Core Strategy. It is also within a designated Residential Area where Policy SS 3 allows for appropriate residential development subject to compliance with other relevant development plan policies.

The proposed development is considered to be acceptable in principle and in compliance with Policies SS 1 and SS 3 of the Core Strategy.

Design: EN4

The host dwelling is a two-storey semi-detached property with a pantile roof and brick work walls. The proposed cart shed would be located to the front of the house facing Jubilee Avenue and adjacent to the southern boundary of the plot. It would be separated from the host dwelling's front elevation by about 1.5 metres. The cart shed would have a dual pitch pantile roof, with timber cladding to the walls and doors to the store area. The car port section would have an open front and sides. It would be approximately 8.5 metres long, 3.2 metres wide and 3.7 metres high.

Jubilee Avenue is characterised by two-storey semi-detached properties. Their frontages comprise a garden/driveway area facing Jubilee Avenue and there are no other houses along Jubilee Avenue that have large buildings such as that proposed to the front of them. Given the proposed building's prominent location, length, scale, separation distance from the existing dwelling and proposed materials, it is considered that it fails to have regard to the local context resulting in a detrimental effect on the host dwelling and character of the wider area. In addition, the building's proposed location would alter the character of the host dwelling's main elevation, resulting in an addition that would harm its appearance in the street scene. As the host dwelling comprises brick work walls, it is considered the proposed timber cladding material would not be compatible with the existing materials, resulting in a form of development that is not suitably designed for the context within which it is set.

Overall, it is considered that the proposal would be detrimental to the character and quality of the area and is therefore contrary to Policy EN 4 of the Core Strategy.

Amenity: EN4

Whilst the proposed building would be located close to the common boundary with 23 Jubilee Avenue, it is considered it would not result in any unacceptable overbearing and overshadowing effects. Therefore, the proposal is considered to comply with Policy EN 4 of the Core Strategy.

Highways: CT 6

Adequate off-road parking facilities exist, and the proposed development would not result in the need for increased parking provision. The proposal therefore complies with Policy CT 6 of the Core Strategy.



Environmental Considerations: EN 13

The site lies west of contaminated land but Environmental Health have advised that there is little risk in this respect. There is therefore no conflict with Policy EN 13.

Conclusion

Whilst the proposed development is acceptable in principle, there are concerns regarding its effect on the character of the surrounding area, for the reasons stated. Refusal of the application is therefore recommended.

**RECOMMENDATION:**

**REFUSE**

For the reasons relating to:

- The effect on the character and appearance of the surrounding area and host property.

Final wording of the reasons to be delegated to the Head of Planning

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**FAKENHAM - PF/19/0787 - Erection of single storey rear extension; 151 Holt Road, Fakenham, NR21 8JF for Mr Punchard**

**Target Date: 15 August 2019**

Case Officer: Bruno Fraga da Costa  
Householder application

## **CONSTRAINTS**

LDF - Settlement Boundary  
LDF - Residential Area

## **RELEVANT PLANNING**

HN/13/0901 HN

151 Holt Road, Fakenham, NR21 8JF

Notification of intention to erect single-storey rear extension which would project from the original rear wall by 4.1m and which would have a maximum height of 2.7m and eaves height of 2.7m

Approved 30/08/2013

## **THE APPLICATION**

Is for the erection of a single-storey flat roofed rear extension.

## **REASONS FOR REFERRAL TO COMMITTEE**

The applicant (Cllr. Jeremy Punchard) is a Member of North Norfolk District Council.

## **PARISH/TOWN COUNCIL**

Fakenham Town Council – no objection or comment.

## **REPRESENTATIONS**

None received.

## **CONSULTATIONS**

None.

## **HUMAN RIGHTS IMPLICATIONS**

It is considered that the proposed development may raise issues relevant to

Article 8: The Right to respect for private and family life.

Article 1 of the First Protocol: The right to peaceful enjoyment of possessions.

Having considered the likely impact on an individual's Human Rights, and the general interest of the public, approval of this application as recommended is considered to be justified, proportionate and in accordance with planning law.

## **CRIME AND DISORDER ACT 1998 - SECTION 17**

The application raises no significant crime and disorder issues.

## **POLICIES**

**National Planning Policy Framework (NPPF):**

Section 12 – Achieving well-designed places: paragraph 127

**North Norfolk Core Strategy Policies:**

SS 1 – Spatial Strategy for North Norfolk

SS 3 – Housing

EN 4 – Design

## **MAIN ISSUES FOR CONSIDERATION**

- Principle
- Design
- Amenity

## **APPRAISAL**

Principle: SS 1, SS 3

The site is within the settlement boundary of Fakenham, which is defined as a Principal Settlement under Policy SS 1 of the adopted Core Strategy. It is also within a designated Residential Area where policy SS 3 allows for appropriate residential development subject to compliance with other relevant development plan policies. The proposed development is acceptable in principle and complies with Policies SS 1 and SS 3 of the Core Strategy.

Design: EN 4

The scheme involves the erection of a single-storey flat roof rear extension. It would be approximately 5.5 metres in length, 4.5 metres wide and 2.6 metres high with an overall footprint of approximately 25 sq.m. The proposed extension would extend approximately 4.2 metres from the rear elevation and 3.8 metres from the side elevation.

Given the proposed extension would be single-storey and modest in scale, it is considered to be subordinate to the host dwelling and compatible with the form of it. The design of the proposed extension is considered to be acceptable and therefore it complies with Policy EN4 of the Core Strategy.

Amenity: EN 4

As the proposed development would be single-storey and would be screened from existing dwellings by a 1.8 metre high fence and trees, it is considered that the proposal would not result in any significant detrimental effects on the residential amenity of nearby occupiers. Therefore, it complies with Policy EN 4 of the Core Strategy.

## **RECOMMENDATION:**

**APPROVAL** subject to conditions relating to:

- Time limit for implementation
- Approved plans
- External materials

Final wording of conditions to be delegated to the Head of Planning

**LITTLE SNORING - PF/19/0404 - Erection of single-storey detached dwelling; 3 Pantile Cottages, Kettlestone Road, Little Snoring, Fakenham, NR21 0JQ for Mr R G Deary**

## **Minor Development**

**- Target Date: 04 June 2019**

Case Officer: Caroline Dodden

Full Planning Permission

## CONSTRAINTS

LDF - Residential Area

LDF - Countryside

LDF - Settlement Boundary

Unclassified Road

## RELEVANT PLANNING HISTORY

PF/18/0988 PF

3 Pantile Cottages, Kettlestone Road, Little Snoring, Fakenham, NR21 0JQ

Erection of single storey detached dwelling

Refused 29/11/2018

## THE APPLICATION

The proposal seeks to sub-divide the plot at No. 3 Pantile Cottages and erect a single storey two bed detached dwelling on the southeastern part of the plot. An existing group of timber sheds would be removed and an existing detached garage would be provided for the proposed dwelling.

Members should note that the proposal is the re-submission of a previous application for the same proposal (see above ref: PF/18/0988), which was refused on two grounds. Firstly, on the principle of being a new dwelling within the Countryside and secondly, due to the inadequacy of the visibility splays for the access.

## REASONS FOR REFERRAL TO COMMITTEE

The site is situated within the area identified as Countryside under Policy SS1, where the principle of the proposed new dwelling would not meet any of the exceptions criteria as set out in Policy SS2. The proposal is being recommended for approval and as such, is a departure from policy SS 2.

Councillor Tom FitzPatrick requested that the planning application be referred to the Development Committee if the officer recommendation was for refusal, as he considered that the application complies with Policies EN 4 and SS 2. Section 8 of the Convention of Human Rights (the right to enjoy property) was also felt to be relevant.

## PARISH/TOWN COUNCIL

Little Snoring Parish Council

No objection.

## REPRESENTATIONS

None received.

## CONSULTATIONS

County Council (Highway)

Advise that the visibility shortfall, which was a reason for the refusal of the previous application, has been addressed. As the proposal does not affect the current traffic patterns

or the free flow of traffic there is now no objection. Conditions relating to the upgrading of the existing access, parking and that no gates or other means of enclosure are erected at the entrance are required.

#### Landscape Officer

No objection. The Arboricultural Method Statement (AMS) submitted with the application demonstrates how the dwelling can be accommodated on the site. Conditions to ensure the proposed development is carried out in strict accordance with Arboricultural Impact Assessment (AIA), AMS and Tree Protection Plan (TPP) are requested.

#### HUMAN RIGHTS IMPLICATIONS

It is considered that the proposed development may raise issues relevant to

Article 8: The Right to respect for private and family life.

Article 1 of the First Protocol: The right to peaceful enjoyment of possessions.

Having considered the likely impact on an individual's Human Rights, and the general interest of the public, approval of this application as recommended is considered to be justified, proportionate and in accordance with planning law.

#### CRIME AND DISORDER ACT 1998 - SECTION 17

The application raises no significant crime and disorder issues.

#### POLICIES

North Norfolk Core Strategy (Adopted September 2008):

SS 1 - Spatial Strategy for North Norfolk

SS 2 - Development in the Countryside

HO 7 - Making the most efficient use of land (Housing density)

EN 4 - Design

EN 10 – Development and Flood risk

CT 5 - The transport impact of new development

CT 6 - Parking provision

#### MAIN ISSUES FOR CONSIDERATION

- Principle
- Design and Amenity
- Highways
- Landscape
- Flood risk

#### APPRAISAL

##### Principle

The site is located within the designated Countryside Policy Area as defined under Policy SS 1 of the adopted North Norfolk Core Strategy. Policy SS 2 lists the types of development that can be accepted in principle in the countryside, restricting new development in general to that which requires a rural location, subject to certain exemptions. These restrictions are necessary as the 'countryside' is the least sustainable location in terms of access to basic facilities by means other than the car and new developments in areas which are principally undeveloped run the risk of undermining the intrinsic value of the countryside. New market housing in the countryside is therefore restricted both by adopted Core Strategy policies and the NPPF.

Little Snoring village is one of the Selected Settlements in the adopted Core Strategy and this categorisation is currently proposed to be retained within the first Draft North Norfolk

Local Plan (2016 - 2036). This means that the Council considers Little Snoring to be a suitable (sustainable) location for modest growth. However, the acceptable locations for this growth are limited by adopted policies to locations within the approved development boundary of the village or to one of the specifically identified development sites made in the Site Allocations Development Plan. The defined boundary and the site allocations process are intended to ensure that growth is both modest in scale and well related to built up areas, with the development boundary serving to broadly define the currently built up areas and distinguishing these from the wider countryside. The site lies outside of the adopted development boundary and is not specifically allocated for development and hence the proposal is a departure from adopted policies.

In this instance, however, the proposed dwelling would be very well related to the built up part of the village, it lies behind existing dwellings, is close to the village primary school, and is immediately adjacent to a Local Plan housing allocation for approximately ten dwellings. Given this, and the principally 'built up' character of the vicinity, and the fact that the proposal is for a small single storey dwelling on an unobtrusive plot, it is considered that it would be very difficult to argue that the proposal would have adverse impacts on the character of the Countryside. Furthermore, given that adopted policies recognise that Little Snoring is a sustainable location for development and that the, albeit limited services, available in the village are all within convenient walking distance, it is considered that would be equally difficult to sustain a refusal on wider sustainability grounds.

Therefore whilst the proposal does not comply with policies SS 1 and SS 2, taking into account all the specific circumstances in this case, it is considered a departure from these policies is justified.

#### Design and amenity

Policy EN 4 requires that all new development is designed to a high quality that reinforces local distinctiveness in order to preserve or enhance the character of the area. No. 3 Pantile Cottages has a substantial garden area situated to the south and southeast of this end of terrace cottage. The proposal would provide a detached 2 bed bungalow in the southeastern part of the existing garden area and an existing detached garage utilised for the new dwelling by relocating the doors its eastern elevation. The scale and design of the proposed dwelling would most closely reflect the existing bungalow development immediately to the southeast of the plot. It would be constructed in red brick and pantiles and be orientated so that its main elevation would face towards the road and its rear elevation face onto a south-facing garden. The existing dwelling would maintain a sizeable garden area to the south

Overall the design, scale and position of the new dwelling would accord with Policy EN 4.

The proposed new dwelling would be positioned an adequate distance from the nearest dwellings at No. 23 Kettlestone Road and No. 10 Stevens Road and, along with its proposed orientation, it is considered that there would be no detrimental impact on the residential amenities of these closest properties, in accordance with Policy EN 4.

#### Highways

The proposed new dwelling would be accessed from the existing driveway that serves No. 3 Pantile Cottages from Kettlestone Road. The existing dwelling has a parking and turning area. The proposed dwelling would be provided with a detached garage and adequate parking and turning within the plot, in accordance with Policy CT 6.

The previous difficulty with regard to visibility splays onto Kettlestone Road has been overcome as part of this re-submission and consequently, subject to the imposition of conditions relating to the upgrading of the existing access and to prevent any gates being erected across the entrance, the proposal would comply with Policy CT 5.

### Landscape

There are a number of existing trees close to the driveway and a small number within the plot boundary. However, the proposal does not require the loss of any trees and consequently, the proposed development is considered to accord with Policy EN 4 in this regard, subject to the imposition of a condition to ensure the proposal is carried out in accordance with the arboricultural reports submitted.

### Flood Risk

The plot itself and access is not susceptible to flood risk, but it should be noted that Kettlestone Road is prone to surface water flooding.

### **RECOMMENDATION:**

Subject to there being no further material comments received in response to further publicity advertising the application as a departure from the current development plan, delegate approval of the application to the Head of Planning Approve subject to conditions relating to the following:

- Commencement of development within three years.
- To be carried out in accordance with the approved plans.
- Submission of samples of materials for external surfaces of new dwelling.
- Development to be carried out in strict accordance with the Arboricultural Impact Assessment, Arboricultural Method Statement and Tree Protection Plan .
- Prior to first occupation of the new dwelling, the vehicular access improvement works shall be constructed in accordance with Drawing No. LS102/01/2019 rev.A.
- No gates/ bollards or other means of obstruction shall be erected across the approved access unless otherwise agreed in writing with the Local Planning Authority.
- Prior to first occupation of the new dwelling, provision of sufficient space for two cars to park in each site, turn and re-enter the highway in forward gear.



## **APPLICATIONS RECOMMENDED FOR A SITE INSPECTION**

There are no recommended site inspections at the time of publication of this agenda.

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## **APPEALS SECTION**

### **(a) NEW APPEALS**

**HAPPISBURGH - PF/19/0294 - Partial demolition of existing buildings and erection of granny annexe; Prospect House, Church Street, Happisburgh, Norwich, NR12 0PN for Mr & Mrs Dixon  
FAST TRACK - HOUSEHOLDER**

**NORTH WALSHAM - PF/19/0069 - Erection of first floor conservatory (retrospective) above existing flat roof extension; Flat 1, Fleet House, 6 New Road, North Walsham, NR28 9DF for Mr Blackmore  
WRITTEN REPRESENTATIONS**

**WELLS-NEXT-THE-SEA - PO/18/1281 - Erection of 4 no. dwellings (Outline Application re: Access); The Nurseries, Theatre Road, Wells-next-the-Sea, NR23 1DS for Norfolk Heritage Coastal Developments Ltd  
WRITTEN REPRESENTATIONS**

**WELLS-NEXT-THE-SEA - PF/19/0232 - Erection of second storey to an existing attached boat store and workshop and 4.no dormer windows and 1 no. Juliet balcony to the south elevation to create additional living accommodation.; Apple Croft, 4 Beldorma Close, Wells-next-the-Sea, NR23 1EE for Mr Kerr  
FAST TRACK - HOUSEHOLDER**

### **(b) INQUIRIES AND HEARINGS - PROGRESS**

None.

### **(c) WRITTEN REPRESENTATIONS APPEALS - IN HAND**

**HOVETON - PF/18/2202 - Erection of rear single storey extension, creation of front first floor extension, demolish existing garage and erection of garage with annexe accommodation above; Windborne, 21 Stalham Road, Hoveton, Norwich, NR12 8DJ for Mr Webster**

**NEATISHEAD - PF/18/0025 - Change of use of land from sewage treatment works to private recreational use, including erection of polytunnel, storage shed and siting of Shepherd's Hut; Anglian Water Authority Sewage Div Bt 4 and 5, King Street, Neatishead for Mr & Mrs Plater**

**OVERSTRAND - PF/18/1330 - Erection of two-storey dwelling; Land at Arden House, 5 Arden Close, Overstrand, Cromer, NR27 0PH for Mr & Mrs M Storer**

**POTTER HEIGHAM - PF/18/1298 - Change of use of agricultural land and part of building, including external alterations, to fitness studio and car park (retrospective); Glebe Farm, Marsh Road, Potter Heigham, GREAT YARMOUTH, NR29 5LN for R&B Norfolk Ltd**

**RUNTON - ADV/19/0324 - Display of non-illuminated advertisement panel mounted on posts; Dormy House Hotel, Cromer Road, West Runton, Cromer, NR27 9QA for Mr Brundle**

**STIBBARD - PF/19/0118 - Erection of 4no. two storey dwellings (2no. detached two-storey dwellings and a pair of two-storey semi-detached dwellings) with detached cart lodges and new vehicular access; Land South East of Fruit Tree Farm, Guist Bottom Road, Stibbard for Mr & Mrs Spencer Ashworth**

**HAPPISBURGH - ENF/18/0069 - Land being used for siting a caravan for residential purposes; 17 Rollesby Way, Happisburgh**

**(d) APPEAL DECISIONS - RESULTS AND SUMMARIES**

**BODHAM - PF/18/1124 - Erection of a pair of semi detached light industrial units (B1); Gipsies Lane Works, Weybourne Road, Bodham, Holt, NR25 6QJ for North Norfolk Garden Machinery Ltd**

**APPEAL DECISION:- APPEAL DISMISSED**

**FELMINGHAM - PF/18/1700 - Conversion of barn to annexe accommodation ancillary to main house and installation of a septic tank; Grange Farm, Grange Road, Felmingham, North Walsham, NR28 0LT for Strange Farm Ltd**

**APPEAL DECISION:- APPEAL DISMISSED**

**HOLT - PF/18/0513 - Construction of 2 No. single storey detached dwellings and use of existing access; The Grove, Cromer Road, Holt for Mr Storey**

**APPEAL DECISION:- APPEAL ALLOWED**

**HOVETON - PF/18/1848 - Single storey extension to side/rear and replacement roof to allow for accommodation with the roof space; Flamingo Cottage, 15 Church Road, Hoveton, Norwich, NR12 8UG for NGS Civil Engineer & Technician Services**

**APPEAL DECISION:- APPEAL DISMISSED**

**POTTER HEIGHAM - PO/18/1402 - Erection of detached bungalow and garage - outline (details of appearance reserved); White Gables, Dove House Lane, Potter Heigham, Great Yarmouth, NR29 5LJ for Mrs Elam**

**APPEAL DECISION:- APPEAL DISMISSED**

Summaries of the above decisions will be reported to the next meeting.

**(e) COURT CASES - PROGRESS AND RESULTS**

No change from previous report.