

NORTHREPPS – PF/22/1708 - Siting of 2 glamping pods for holiday use at Shrublands Farm Camping Site, Craft Lane, Northrepps.

Minor Development

- Target Date: 9th September 2022
 - Extension of time 31st March 2023
- Case Officer: Miss A Walker
Full Planning Permission

RELEVANT SITE CONSTRAINTS:

Countryside
Area of Outstanding Natural Beauty
Landscape Character Area Type RV6 (River Valley)
County Wildlife Site – Templewood Estate

RELEVANT PLANNING HISTORY:

PF/21/2263

Siting of four glamping pods for holiday use at Shrublands Farm Camping Site
Refused by Committee 17.12.2021

PF/92/0781

Siting of 5 self-contained holiday lodges (Land Part of Shrublands Farm, Church Street Northrepps)
Refused 30.07.1992
Appeal Dismissed 07.01.1993

THE APPLICATION

Is a resubmission of PF/21/2263 and seeks full planning permission for the siting of 2 no. self-contained curved timber glamping pods to be constructed on a rectangular parcel of land at Shrublands Farm to the south of Northrepps village. The glamping pods would be arranged informally with each pod providing self-contained holiday accommodation including bedroom, bathroom and kitchen facilities, and measuring approximately 3.3 metres in width, 7.2m in length, with a maximum height of 2.8 metres. On-site parking would be provided to the front of each pod, along with an area of decking proposed to the north of each pod, with indicative details provided.

The application site is currently used as a 'Certified' Caravanning and Camping Site to the east of Craft Lane. To the north-west of the site lies a parcel of grassed land within the Applicants ownership. Access to the glamping pods would be via an existing forked vehicular access off Craft Lane, currently used to serve the Certified site.

REASONS FOR REFERRAL TO COMMITTEE:

At the request of Councillor Fitch-Tillett who confirmed support for the application for the following reasons.

In respect of harm to the AONB it is my understanding that these pods will be serviced (by this I assume you mean cleaned and topped up with provisions as required) and as Vice Chairman

of the Norfolk Coast Partnership, one of our policies is to entice tourism away from the hot spots and this would seem to comply with this. Any additional potential light pollution can be controlled by condition.

In respect of the dangers of traffic in Craft Lane, I understand that the applicant will be providing a footpath link from the within the site to link to the paved part of Craft Lane thus making a safe pedestrian access to the village centre. It is to be noted that Craft Lane is served by the OurBus service taking passengers to either North Walsham or Cromer. This site is infinitely preferable for access than the current siting at the top of Hungry Hill.

PARISH/TOWN COUNCIL:

Northrepps Parish Council – Fully Support

CONSULTATIONS:

NNDC Landscape Officer – **Object** to the proposal for the following reasons:

‘The proposed installation of 2 permanent glamping pods for year round use (as stated on the Shrublands Farm website) within this exempted camping site at Shrublands Farm within the Norfolk Coast AONB and designated Countryside raises significant policy conflict.

It is understood that the wider Shrublands campsite offering tented pitches, motorhomes, caravans and shepherds huts and glamping pods from March to November has no formal planning permission and operates under the 28-day exempted site legislation. Given this context, the current proposal for two glamping pods must be considered as a new tourist facility, engaging Local Plan Policy EC10 Static and Touring Caravan and Camping Sites. This policy clearly states that new tourist facilities will not be permitted within the Norfolk Coast AONB due to the landscape impact and additional visitor pressure that may result. Given the site location within the AONB this raises a principle policy conflict.

The site is located off Craft Lane, a small, narrow rural lane that connects Northrepps to Southrepps, via Frogshall, and is wholly within the Norfolk Coast AONB. The road is typical of the quiet rural lanes that are prevalent in this part of the District and is itself part of a Sustrans Cycle route. The site is located within the River Valleys Landscape Character Type (North Norfolk Landscape Character Assessment, LCA, January 2021, SPD), specifically within Mundesley Beck (RV6), and is characteristic of the valued features and qualities of the defined Landscape Type. For example, small field sizes that provide an intimacy and a strong sense of place on the valley floor, woodland edge and sense of rurality and historical continuity.

The increase in domestic tourism and the demand for new facilities and infrastructure (including camping and glamping sites) is cited as a key force for change for the landscape type, which can increase traffic levels, recreation pressure and light pollution, all of which detract from the prevailing landscape character.

Although any wider visual impact would be relatively contained by the enclosed wooded setting around the pods, the permanent structures would be visible in the

winter months. This, together with the increased human activity, light spill and vehicle movements that the development would generate year-round would not conserve or enhance the valued features of the Landscape Type or the defined special qualities of the Norfolk Coast AONB, particularly 'a sense of remoteness, tranquillity and wildness'. The development would not conserve or enhance the landscape and scenic beauty of this designated landscape, as required under para 176 of the NPPF, and to which 'great weight' should be afforded in the planning balance. For the same reasons, and as set out above, the development would conflict with Local Plan Policy EN2: Protection and Enhancement of Landscape and Settlement Character and Local Plan Policy EN1: Norfolk Coast AONB and the Broads.

The Landscape section therefore conclude that any economic benefits resulting from this development are not outweighed by the considerable national and local policy conflict, particularly in relation to the designated landscape of the AONB.

Norfolk County Council (Highways) – Object to the proposal for the following reasons:

"I note that this is a revised application to [application reference: PF/21/2263] with the number of proposed glamping pods reduced from four to two. I attach below my comments in relation to that application:-

'Further to my response to your Authority of the 21 September 2021 I have been made aware that this overall site has only permission for camping units based upon a Certificated Camping licence granted under the Camping & Caravan Act rather than via any Planning consents.

Accordingly the agents suggestion that these glamping pods will replace existing camping units is flawed in that any additional units, above that allowed under the Certificate' would appear to have been unlawfully accommodated on the site. There is also no suggestion that the camping allocation granted under the Certificated Camping licence would be given up should this application be allowed.

I also have been made aware of a previous similar application [application reference: PF/92/0781] on this site that was refused and dismissed at Appeal (T/APP/Y2620/A/92/212496/P5) with the reasons for dismissal being in part related to highway matters.

I include below a copy of part of the Appeal Inspectors assessment which again reflects the current situation regarding the vehicular access route to the site;-

'Turning to the second main issue, I saw that Craft Lane is a single track road with limited opportunities for vehicles to pass each other. It is also without footways and is unlit.

A small number of dwellings to the north-west and the southeast of the appeal site take access from the lane. In my view Craft Lane provides a poor access to the present caravan site because of the restricted width and the length. I appreciate that the present use by the Caravan Club is permitted development and therefore outside the control of the Council and the Highway Authority. You argue that the proposed development would generate less traffic than the present use of the site because the occupiers of the proposed lodges would be less inclined to leave the site.

I do not find this to be a compelling argument. I would expect a greater use of the site over a longer period as a consequence of the permanency of the lodges.

Moreover, it is reasonable to expect that visitors would wish to avail themselves of the wide range of tourist attractions and the quality of the landscape no less than the occupiers of caravans. In my opinion the proposal would lead to a greater use of the lane.

This could cause a degree of inconvenience, particularly for nearby residents who regularly use the lane. Moreover, because of the absence of footways and street lighting, an increase in traffic flows would add to the dangers faced by pedestrians. I conclude that the proposed development would, as a consequence of increased traffic, cause a deterioration in highway safety'.

The present proposal, on the basis that any camping/caravan units to be replaced are unlawful, is therefore detrimental to highway safety on the approach road to the site and should be refused for the following reason:-'

(SHCR 07) The road. Craft Lane (C292), serving the site is considered to be inadequate to serve the development proposed, by reason of its poor alignment / restricted width / lack of passing provision / restricted visibility at adjacent road junctions and lack of pedestrian facilities. The proposal, if permitted, would be likely to give rise to conditions detrimental to highway safety. Contrary to Development Plan Policies.

In the absence of definitive evidence that any mitigating reduction of existing lawful camping accommodation will result, the proposal must be seen as increasing the traffic use of the narrow and severely sub-standard Craft Lane and I must therefore recommend the application for refusal as before.'

Norfolk Coast Partnership – Confirmed they neither object to nor support the application. Comments as follows;

“Our original concerns as to the growth of the site remains, the pods will be more of a permanent feature in the landscape albeit well screened. The actual physical impact of the pods on the landscape and AONB may be negligible. However there will be added cars on site as well as potential light pollution if not mitigated and movement creating visual disturbance.

EC 10 states ' 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'. This was the main reason for refusal at the last submission and I suspect will be the same for this proposal even though the number has reduced. I don't feel I can fully support the proposal as it will not 'conserve and enhance' the AONB in line with NPPF para 176 and there are questions around EC3 and EC7 and being fully compliant.

However it is difficult to object given the precedent of other development on the site. In landscape terms and looking at the proposal as it stands I don't believe there will be a significant impact on the AONB however in terms of Local Plan policy there is a direct conflict and Highways have also objected.

The buildings are relatively modest and screened therefore if approved we would not want to see additional infrastructure on site or sub urbanisation of the area with artificial boundary treatments etc. We would also ask that no external lighting is included to safeguard our dark skies, a special feature of the AONB.”

Environmental Protection - Provided no comment

Economic Growth Team - **Support** the application and provide the following comments as follows;

‘The Economic Growth Team has reviewed the application and further discussed the proposal with the applicant.

The proposed erection of 2 glamping pods will complement the farm’s existing camp site and provide an all year offer to visitors. This is key to providing the farm with a degree of economic sustainability outside of the peak summer holiday period and strengthen the resilience of the business.

The Economic Growth Team recognises the importance of the applicant’s business in contributing to the north Norfolk visitor economy. It recognises that there are potential economic benefits that would be derived by such a proposal – such as supporting the local supply chain, local spend from visitors, supporting local businesses etc.’

REPRESENTATIONS:

None 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, refusal 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.

LOCAL FINANCE CONSIDERATIONS

Under Section 70(2) of the Town and Country Planning Act 1990 the council is required when determining planning applications to have regard to any local finance considerations, so far as material to the application. Local finance considerations are not considered to be material to this case.

RELEVANT POLICIES:

North Norfolk Local Development Framework Core Strategy (September 2008):

Policy SS 1 Spatial Strategy for North Norfolk
Policy SS 2 Development in the Countryside
Policy SS 4 Environment
Policy SS 5 Economy
Policy SS 6 Access and infrastructure
Policy EN 1 Norfolk Coast Area of Outstanding Natural Beauty and The Broads
Policy EN 2 Protection and enhancement of landscape and settlement character
Policy EN 4 Design
Policy EN 9 Biodiversity and geology
Policy EN 13 Pollution and hazard prevention and minimisation
Policy EC 1 Farm Diversification
Policy EC 3 Extensions to existing businesses in the Countryside
Policy EC 7 Location of New Tourism Development
Policy EC 10 Static and Touring Caravan and Camping Sites
Policy CT 5 The transport impact of new development
Policy CT 6 Parking provision

Material Considerations:

Supplementary Planning Documents and Guidance:

North Norfolk Design Guide (December 2008)
North Norfolk Landscape Character Assessment (January 2021)
North Norfolk Landscape Sensitivity Assessment (January 2021)

National Planning Policy Framework (2021):

Chapter 2 Achieving sustainable development
Chapter 4 Decision-making
Chapter 6 Building a strong, competitive economy
Chapter 9 Promoting sustainable transport
Chapter 12 Achieving well-designed places
Chapter 14 Meeting the challenge of climate change, flooding and coastal change
Chapter 15 Conserving and enhancing the natural environment

Other relevant documents/considerations

National Design Guide (September 2019)
Norfolk Green Infrastructure and Recreation Impact Avoidance and Mitigation Strategy – Habitats Regulations Assessment Strategy Document (March 2021)
Natural England's letter to local planning authorities dated 16th March 2022 regarding nutrients

OFFICER ASSESSMENT:

MAIN ISSUES FOR CONSIDERATION:

1. Principle and site history
2. Design and landscape impacts including upon the AONB
3. Residential amenity
4. Highway safety
5. Other matters

1. Principle and Site History

This application seeks to construct 2 no. glamping pods on a parcel of land belonging to Shrublands Farm in Northrepps.

The application site lies within a rural location on the periphery of Northrepps village, on land designated as 'Countryside' under Policies SS 1 and SS 2 of the North Norfolk Core Strategy. Policy SS 2 of the North Core Strategy limits the types of development to those requiring a rural location, with the principle of 'recreation and tourism development' (such as that being proposed) supported, subject to compliance with other local and national planning policies.

Policies EC 7 and EC 10 deal specifically with controlling the location of new tourism development, with EC 7 requiring a sequential approach to its location, with specific reference that new build unserviced holiday accommodation in the Countryside should be treated as permanent residential dwellings and should not be permitted. Policy EC 10 further states that new static caravan sites and woodland holiday accommodation (which would also cover glamping pods) will only be permitted in limited circumstances, and not where they are located within sensitive landscape designations such as the Norfolk Coast AONB, with extensions to existing sites being tightly controlled where they demonstrate a high standard of design and have minimal adverse impacts upon their surroundings.

In this case, the site, while used as a caravan/camping site does not benefit from planning permission, but instead has operated for many years as a Certified Camping site, over which the Council has no control subject to it operating within the parameters of the exemption licence. The pods would replace and relocate the two existing pods located within the farm site itself which also appear to be in use without the benefit of planning permission.

The site lies within the Norfolk Coast AONB where Policy EN 1 of the Core Strategy recognises the impact of individual proposals and their cumulative impact on the designated AONB and its setting, stating that proposals which would be significantly detrimental to the special qualities of the AONB and their setting should not be permitted.

Therefore, given the sites certified status, Officers would conclude that the scheme should be assessed as a new camping site under Policy EC 10, as opposed to a scheme for the extension or intensification of an existing site, with its location within the Norfolk Coast AONB, therefore resulting in the scheme being contrary to the requirements of Policy EC 10. This view is also reflected in the Landscape Officers objection to the principle of such a development being permitted in this location. The self-contained nature of the holiday accommodation being proposed would also result in the creation of new-build unserviced holiday accommodation in the Countryside, which would also be contrary to Policy EC 7. Members attention is drawn to the planning history section which refers to a similar proposal for the siting of 5 no. self-contained holiday lodges to be sited on this land (Ref: PF/92/1086). Whilst some years ago and thus determined under different policies, the application was refused and dismissed at Appeal on the grounds of principle, detrimental impacts upon the AONB/landscape and highway safety.

In any case, the benefits, including economic benefits of the proposal would need to be balanced against the significant harm which would result from new tourist accommodation being permitted within this sensitive landscape designation. The certified camping site is run

by a separate company 'Shrublands Farm' which supports the Farm business 'Northrepps Farming Company' via a rental agreement. Whilst a detailed economic farm report has been submitted which states the farming enterprise is rather reliant on the "rental support" from Shrublands Farm in order to return a profit, no specific details regarding the economic benefits accruing from this proposal have been submitted and given the application would replace and relocate existing pods located within the farm site itself there is unlikely to be a significant additional economic benefit resulting from this proposal.

2. Design and Landscape Impacts Including upon the Norfolk Coast AONB

A site layout has been provided in support of the application, along with visualisations of the external appearance of the two proposed glamping pods. However, no proposed elevation drawings or detailed floor plans have been submitted. Details such as external appearance and materials could be conditioned in the event of approval and, from a purely design perspective, Officers consider that the proposed glamping pods and decking areas would likely be acceptable in design terms to enable compliance with Policy EN 4 and Chapter 12 of the NPPF.

Notwithstanding this, due to their location within the designated AONB, Landscape Officers objected to the scheme, along with the concerns raised by the Norfolk Coast Partnership. These concerns relate to compliance with Policy EC 10 and the resulting impacts that the addition of 2 no. permanently sited glamping pods would add to the traffic levels, recreation pressure and light pollution, all of which detract from the prevailing landscape character in this part of the AONB, eroding key features such as tranquillity and dark skies.

The pods would occupy the site year round making them permanent structures which could be occupied throughout the year. The Planning Statement references a gate which could be locked from the end of the summer season. Landscape Officers are of the opinion that, whilst wider visual impact would be relatively contained by the enclosed wooded setting around the pods, as permanent structures the pods would be visible in the winter months. This, together with the increased human activity, light spill and vehicle movements that the development would generate would not conserve or enhance the valued features of the Landscape Type or the defined special qualities of the Norfolk Coast AONB, particularly 'a sense of remoteness, tranquillity and wildness'.

Officers consider that the development proposals would be contrary to Policies EN 1, EN 2, EC 7 and EC 10 of the Core Strategy as they would fail to protect or conserve the valued features of the Norfolk Coast AONB or defined Landscape Character.

3. Residential Amenity

Core Strategy Policy EN 4 supports development proposals where they would not have a significantly detrimental impact upon the residential amenity of nearby occupiers.

It is noted that existing residential properties lie to the north-west and south of the site. Notwithstanding this, given the degree of separation from this proposed site, the presence to the existing established vegetation and the fact that the application site is already largely used for tourism purposes (albeit for a lesser period due to the certification limitations), it is not considered that the proposals would result in any significantly detrimental impacts upon the residential amenities of the occupants of the existing properties in respect of privacy, light or

disturbance. Lighting could be controlled through the imposition of conditions.

As such, it is considered that subject to the proposed conditions, the proposed development would broadly comply with the requirements of Policies EN 4 and EN 13 of the adopted North Norfolk Core Strategy in respect of protecting residential amenity.

4. Highway Safety

Access to the site would be via an existing unmade access off Craft Lane which currently serves the Certified Camping site.

It is noted that under previous application PF/21/2263, NCC Highways officers raised concerns regarding the suitability of the surrounding road network (due to it being accessed by narrow single-track roads) to cater for the proposed development but did not raise a formal objection.

However, since the consultation of 21 September 2021 NCC Highways were made aware that the overall site only has permission for camping units based upon a Certificated Camping licence granted under the Camping & Caravan Act rather than via any Planning consents.

Officers consider that the traffic impact of a 28-day Certified Camping site does not provide an adequate fallback position in highway terms to justify or enable permanent all-year glamping pods which would intensify highway movements. The road serving the site (Craft Lane), is considered to be inadequate to serve the development proposed, by reason of its poor alignment, restricted width, lack of passing provision, restricted visibility at adjacent road junctions and lack of pedestrian facilities. The proposal, if permitted, would be likely to give rise to conditions detrimental to highway safety contrary to Development Plan Policy CT 5 and Highways officers recommend the application for refusal.

5. Other Matters

GIRAMS

A new Norfolk wide Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS) came into effect from 1 April 2022. This is a strategic approach to ensure no adverse effects are caused to European sites across Norfolk, either alone or in combination from qualifying developments and ensures that applicants and local planning authorities meet with the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended). The GIRAMS Strategy applies to all net new residential and tourism-related growth. The proposed development would result in the creation of two new self-contained units of tourist accommodation and a RAMS tariff of £371.86 is required in line with the above strategy. The required £371.86 tariff has not been received, neither has the applicant demonstrated that this development would not have localised and in-combination effects and ensure no adverse impact on the European sites.

In the absence of evidence to rule out likely significant effects and in the absence of suitable mitigation measures to address likely significant effects, the proposal is contrary to the requirements of Policies SS 4 and EN 9 of the North Norfolk Core Strategy and approval of the application would conflict with the legal requirements placed on the Local Planning

Authority as competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended).

Conclusion and Planning Balance

In conclusion, it is considered that the principle of new tourist accommodation in this location, due to its siting with the sensitive AONB designation resulting in conflict with Policy EC 10, its self-contained nature in the 'Countryside' conflicting with Policy EC 7 and the resulting landscape harm due to the introduction of a more intensive use of the site, would if carried out, result in an unacceptable level of harm to the Norfolk Coast AONB and wider landscape character. The access road (Craft Lane) is also considered inadequate to serve the development as proposed and would likely give rise to conditions detrimental to highways safety conflicting with Policy CT 5.

In respect to protected species (GIRAMS), in the absence of evidence to rule out likely significant effects and in the absence of suitable mitigation measures to address likely significant effects, the proposal is contrary to the requirements of Policies SS 4 and EN 9 of the North Norfolk Core Strategy as well as the requirements contained within the Conservation of Habitats and Species Regulations 2017 (as amended).

Officers consider that the development would fail to comply with relevant Development Plan policies and the guidance set out in the National Planning Policy Framework (NPPF). Whilst there are undoubtedly economic benefits attributable to the proposal, these have not been clearly articulated by the applicant and, as such, can only be afforded limited weight in the planning balance. Having considered the benefits and harms associated with the proposals, Officers consider that the adverse impacts of the development would significantly and demonstrably outweigh the benefits.

RECOMMENDATION:

REFUSAL for the following reasons:

In the opinion of the Local Planning Authority:

- 1. The scheme would result in introduction of new build tourist accommodation on land designated as 'Countryside' in Policies SS 1 and SS 2 of the adopted North Norfolk Core Strategy, where Policy EC 7 states that 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 and Policy EC 10 specifically prohibits the principle of new holiday sites within sensitive landscape designations including the Norfolk Coast Area of Outstanding Natural Beauty.**
- 2. A development of 2 no. glamping pods in this location would constitute an unacceptable form of development within the Norfolk Coast Area of Outstanding Natural Beauty and would harm its special qualities, contrary to the requirements of Policies EN 1, EN 2 and EN 4 of the adopted North Norfolk Core**

Strategy, Chapter 15 of the National Planning Policy Framework and the principles set out in the North Norfolk Landscape Character Assessment (2021) and the North Norfolk Design Guide Supplementary Planning Document.

- 3. The access road (Craft Lane) is considered to be inadequate to serve the development proposed, by reason of its poor alignment, restricted width, lack of passing provision, restricted visibility at adjacent road junctions and lack of pedestrian facilities. The proposal, if permitted, would be likely to give rise to conditions detrimental to highway safety contrary to Policy CT 5 of the adopted North Norfolk Core Strategy.**

- 4. The proposed development falls within the Broads Sites, East Coast Sites, North Coast Sites, North Valley Fens and The Wash Zones of Influence and affects European Designations as set out in the Norfolk Green Infrastructure and Recreational Impact Avoidance Mitigation Strategy. The application has failed to demonstrate that the proposed development would not result in adverse effects, either alone or in combination on the integrity of European Sites arising as a result of the development including in relation to recreational disturbance. In the absence of evidence to rule out likely significant effects and in the absence of suitable mitigation measures to address likely significant effects, the proposal is contrary to the requirements of Policies SS 4 and EN 9 of the adopted North Norfolk Core Strategy, and approval of the application would conflict with the legal requirements placed on the Local Planning Authority as competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended).**

Final wording of reasons for refusal to be delegated to the Assistant Director for Planning.