

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 Trimmingham 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 Trimmingham 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 12th 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.