

Reference: 06/20/0143/F

Parish: Fritton

Officer: Chris Green

Expiry Date: 22/6/20

Applicant: Tingdene Limited

Proposal: Re-development of former golf driving range area, a part of the short 18-hole golf course for 157 static holiday caravans, including associated landscaping, formal and informal areas of open space, access and internal foot paths

Site: Land at Caldecott Hall, Beccles Road, Fritton

REPORT

1. Background

- 1.1 This is a full planning application for the placement of 157 static caravans for holiday purposes on land.
- 1.2 The details of layout will be subject to a caravan site licence.

2. Site and Context

- 2.1 This site is a rectangular parcel of land of 8 hectares to the north of the lane which forms part of Angles Way. This lane where crossed by the access path between Caldecott Hall and the former driving range is technically an unclassified road (U61851 "Back Lane") with a 60mph speed limit. It is however a narrow unsurfaced sandy track more akin to a footpath.
- 2.2 It is largely laid to grass with the remains of the golf driving range shelter to the east end and boundaries planted with mature trees. To the north side of the site in the direction of the Broads, the tree belt on land outside the applicant's control is 100m wide.
- 2.3 A pair of 132kV pylon power lines cross the land.
- 2.4 The site lies on the boundary of the Broads area, and on the edge of Broads Landscape Character Area 9 Waveney - St Olaves to Burgh Castle. The Broads Area here is relatively tranquil and rural in character. Pylons, large scale boatyards and caravan parks disturb the tranquillity from within the adjacent Great Yarmouth Borough. The condition of the area is poor from an ecological

perspective with areas of dried out fen, arable marshes and only small relict areas of heathland remaining.

- 2.5 The point where the golfing and holiday complex meets the A143 has a broad mown verge on this, the west side of the highway, that extends by around 200m back towards Fritton, from the junction. There is a short distance of around 50m to the link footpath back towards Angles Way along the main road where there is no footway, and tree branches at low level would discourage pedestrians. The start of the 30mph speed limit for Fritton is just north of the footpath. To the south of the footpath is a turn in and hatched area forming a layby outside Fritton Plant Centre and this is advertised as a bus stop (and shown on the County Council's mapping layers), but there appears to be no bus stop signage in the street-view image. The advertised service is hourly in each direction.
- 2.6 Within the existing Caldecott Hall there is a golf club house with dining and bar provision, a swimming pool and health spa, the golf course and just off site the equestrian centre.
- 2.7 The site is generally remote from housing with the exception of dwellings on the Angles Way, the nearest known as Foxburrow in the southeast corner of the site and a farmhouse and cottage beyond that.

3. Proposal

- 3.1 It is proposed to make use of the land as a static holiday caravan site with access paths and open areas towards the centre and west end of the site and under the power lines where covenants would prevent development.
- 3.2 Five full time jobs are shown as created.
- 3.3 The access would either be tarmacked or hard-cored. At present the surface is sandy gravel with some imported material but not a formal surface.
The applicant has stated willingness to work with the County Council to create a suitable surface for vehicular increased access while respecting the unclassified highway context.
- 3.4 The applicant's agent has explained that the model for this site in terms of tenure is for the onward sale of caravans to members of the public on an individual basis for their use as a holiday home and somewhere they can then let out to other holidaymakers on an individual basis, and it is noted that this is the model used by this developer on other sites that it owns. Owners pay an annual charge towards shared maintenance costs within the caravan park.
- 3.5 Accompanying both proposals are the following documents:
 - Planning statement /Design and Access Statement
 - Flood Risk Assessment and Drainage Strategy
 - Arboricultural Impact Assessment

- Landscape Visual Impact Assessment
- Heritage Assessment
- Transport Assessment
- Ecology Appraisal and strategy
- Contaminated Land Report

4. Relevant Planning History

4.1 This site has been used as part of a golf short course and driving range.

The transport assessment notes that this previous use would have generated around 90 daily car movements

4.2 The site is currently shown on the adopted proposal map as being a Tourism Facility rather than as "tourism accommodation" and it is noted that the proposal map associated with part 2 of the plan currently at regulation 19 stage does not show "tourism facilities" just accommodation, and the area of the proposal site is outside the accommodation area.

4.3 There is however an outline permission for a 100 bed hotel from 1996 that has been confirmed, by a letter in the possession of the applicant from the Borough Council as still extant because the other aspects of this development including a golf course and equestrian facility were implemented (ref 06/96/0854/F). These permissions relate to a much wider area than this parcel of land. It is however noted that the site of the 100 bed hotel was subsequently shown as being part of the lodge development, although the lodges as built do not intrude onto this parcel of land. Current legal advice is that this permission is not now extant.

5. Consultations :- All consultation responses received are available online or at the Town Hall during opening hours

5.1 Both parish councils for **Fritton and St Olaves** and for **Belton and Bradwell** have objected, their objections mirror the reasons raised by other correspondents below and in addition:

- Occupancy of the caravans close to power lines will harm occupants
- Impact on doctor's surgery capacity.
- Cumulative impacts of caravan parks generally in the area in conjunction with the application by the Wild Duck site in Belton for further expansion and interaction between the two sites.

5.2 Neighbours and residents of the village have objected, on the following summarised points:

- There are power-lines with harmful impact on health
- Traffic on the A143 is heavy and fast and there are no footways
- There is a lot of foot traffic on the Angles Way.
- This high density development will disrupt the tranquillity of the place and the Broads.
- There will be ecological harm to flora and fauna
- People might try to drive along the unsurfaced lanes to access the site
- More people will use the footpath.
- Surface water and foul drainage is poor
- Trees will be lost
- There will be noise and smell and intrusive lighting
- Rubbish will accumulate
- Privacy to the nearby dwellings will be harmed
- Village services and infrastructure will be harmed.
- There is low rainfall and high fire risk
- There is cumulative harm with the Wild Duck site
- Property value will fall.
- An adjacent landowner's surveyor has written in objection over concerns regarding vulnerability of their land to trespass and fire risk.

5.3 Consultations – External

Norfolk County Council

5.4 Highways – No objection. In an updated response on 22 June 2020, the County Highways team reflected further that while the Angles Way is the U61851 “Back Lane”, its character is such that vehicular use would be very unlikely. A Traffic Regulation Order is not therefore appropriate or something that could be linked to planning as having its own consenting process. The County Highway Authority recommend conditions that: Means of vehicular access to and egress from the development hereby permitted shall be derived from and to A143 Beccles Road only and there shall be no direct vehicular access from or onto U61851 Back Lane.

5.5 Rights of Way Officer – no comment (Angles Way is a highway not a footway).

5.6 Historic Environment Service – We disagree with the Heritage statement in regard to the need for further investigation, the area is in the vicinity of Neolithic features and so the three model conditions are required..

5.7 Norfolk Constabulary (Architectural Liaison Officer) -
Recommends appropriate boundary treatment and lighting to provide adequate security protection, privacy and reduce unauthorised pedestrian permeability.

5.8 Norfolk Fire and Rescue. Standard comments regarding provision for fire-fighting, but noted too when asked, that further small scale, on site, fire prevention and firefighting measures would be negotiated with the operator as part of the licencing regime. As such these need not be further considered under the planning application process.

- 5.9 Broads Authority** - The Broads Authority note that development of leisure and recreational industries in this area impact the Broads Area and require mitigation, especially where cumulative impact occurs. They concur with the agents report that direct visual landscape impact does not occur as a result of mature planted screening. There is potential impact of light pollution on the Broads and the wider landscape, this can however be controlled by condition. The large-scale of the development will create disturbance to the locality and wider Broads area and this will be a cumulative impact in relation to the number of similar existing sites in the area. The authority is critical of the quality of the proposal with high density, regular alignment and close spacing. The submitted proposed landscaping drawing is too vague. The creation of heathland as mitigation/enhancement would be of benefit. The proposals are of a scale and intensity which is considered inappropriate and would erode the distinctive perceptual qualities of landscape character and the setting of the Broads. If approved, the Broads Authority request further consultation on details, with limited external lighting secured by condition and further full landscape details by condition.
- 5.10 Broads Drainage Board** – The response of the internal drainage board on 3 June 2020 to the drainage test results and the strategy, removes any objection. While the IDB has a separate consenting system not materially considered within the planning process, their objection can frustrate the implementation of planning permissions. This impediment is removed.
- 5.11 Natural England** – No objection subject to RAMS mitigation payments

Consultation - Internal GYBC

- 5.12 Environmental Health – (licensing)** note the requirement for a caravan site licence but do not object to the application.
- 5.13 Environmental Health – (contaminated land, noise, air quality)**
No objections, further reports are not required. A bund adjacent to the caravan on cross-section A, would be sensible but not essential. Noise from the proposed vehicle movements are not significant and are less than that of the former driving range. Noise from visitors to the caravans is considered reduced by distance. The closest proposed caravans are 43 m (along cross section B) and 55m (along cross section A) from the nearest dwelling. Cross section B has noise mitigation from a proposed new bund, as well as distance, though whilst cross section A has greater distance, perhaps it would benefit from a bund in the position of the proposed new planting by the caravan. The proposed rules and management of the park seem suitable to prevent noise nuisance. We recommend a planning condition to prevent year-around residential occupation and a restriction on any sub-letting of the caravans for noisy parties.

The low-level LED lighting, with shades to prevent light spill and limits on hours of use in section 15.9 of the Landscape and Visual Impact Assessment should be sufficient to mitigate light pollution. If the Police comment requires lighting design change then the EH team will want to review and make further recommendations.

No objections or further requirements for the foul and surface water drainage and the land contamination report.

6. Assessment of Planning Considerations: Policy Considerations:

National policy

- 6.1** Paragraph 47 of National Planning policy Framework states: Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 6.2** Paragraph 8 of NPPF sets the balance between the "three overarching objectives" the "economic objective" to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure; the "social objective" - to support communities' health, social and cultural well-being; and the "environmental objective" - to protect and enhance the natural, built and historic environment; improve biodiversity, use natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 6.3** Paragraphs 83 and 84 "Supporting a prosperous rural economy" seek decisions that should enable: the sustainable growth and expansion of all types of business in rural areas, and sustainable rural tourism and leisure developments which respect the character of the countryside; and seek to retain local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, and public houses and goes on at paragraph 84 to recognise that sites may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.
- 6.4** This proposal is on previously developed land, albeit of open character, it will help to support the local shops and pubs and with the right additional measures to enable access can support and utilise the available non-car modes during stays on the site.

Local Policy Adopted Core Strategy

- 6.5** Policy CS6 "Supporting the local economy" supports the local visitor economy by supporting the provision of development essential to sustain a rural workforce whilst seeking to avoid the loss of the best and most versatile agricultural land. This Sandling site is not high-quality agricultural land.
- 6.6** Current adopted core strategy Policy CS8 - "Promoting tourism, leisure and culture"
Encourages development of the tourism sector and Encourages and supports the upgrading, expansion and enhancement of existing visitor accommodation and attractions to meet changes in consumer demands and encourage year-round tourism and new, high quality tourist, leisure and cultural facilities, attractions and accommodation. These should be easily accessed and have good connectivity with existing attractions. Arguably the presence of the golf course and equestrian facility provide the existing attraction and the proposal map recognises the existing use as such.
- 6.7** The proposal is considered marginal in encouraging the wider off-site evening and night time economy given its type but little weight in the consideration as not a necessity in this rural location.
- 6.8** The policy seeks proposals that are sensitive to the character of the surrounding area and maximise the benefits for the communities affected in terms of job opportunities and support for local services, The proposal creates five jobs which given the form of activity would suit local people, there will be some benefit to local shops and public houses, though this will be only realistically accessed by car.
- 6.9** The proximity to the Angles Way and Burgh Castle would help fulfil the requirement to promote habitat-based tourism, in particular in the context of the nearby Broads area.
- 6.10** The requirement that rural areas should be protected by following a settlement hierarchy approach (as per CS2) is challenged by this application to some extent, the policy goes on to reflect that rural tourism if small scale can be acceptable. This is a larger site, however, the permission in outline for a hotel of 100 beds does offer some precedent for this proposal, albeit on a smaller scale.
There is some legal debate as to whether this consent remains extant, however it does remain significant in that the impacts of a 100-bed hotel were considered albeit under policies current in 1996.
In terms of scale though 157 caravans with typical occupancy of at least two persons creates roughly three times the number of visitors when compared to a 100-bed hotel.

- 6.11** Environmentally sensitive locations are considered to be able to be protected from cumulative impact by mitigating financial contributions for recreational disturbance.
- 6.12** There will be some direct noise generated on site. It is not considered that there would be unusual air quality issues arising from vehicle use and barbeques. This is because this is common to residential areas where amenity concerns are considered to be set higher than for temporary holiday use.
- 6.13** There will be economic benefit to the rural and district economy. This form of activity does offer some possibility of social distancing so it is likely these sites will be among the earlier ones to revive the Tourism economy post the Coronavirus pandemic.
- 6.14** The site is served by public transport to some extent by the approach drive and the bus stop 300m from the point where this meets the public road. This requires walking alongside a high-speed road with no footway. An alternative of similar 1.5km distance is to travel along the (sandy in places) unsurfaced Angles Way to Belton. For the reason of this alternative, it is considered unreasonable to require the applicant to attempt to improve the foot access to the Fritton bus stop.
- 6.15** Policy CS9 – “Encouraging well-designed, distinctive places”: seeks to improve design. Since caravans are not “buildings” in planning law, the opportunities to create places does not occur as caravans are ephemeral.
- 6.16** Observations that this is a low-quality solution are therefore difficult to lend weight to as layout and density fall under the caravan site licence. The overall principle of use for this “caravan site” purpose alone can therefore be debated here but not the detail.
- 6.17** There will be opportunity to promote and enhance green infrastructure and to “Provide safe access and convenient routes for pedestrians and cyclists, maintaining high levels of permeability and legibility”. Given the presence of a named major walking route this should be able to be secured. The surface of the Angles Way footpath is not suitable for wheelchair users.
- 6.18** Vehicular access and parking are considered suitable for the use and location of the development, the lengthy drive and easy access to the Angles Way footpath will serve to make cycling for example a more attractive proposition. The Angles Way as noted in the site description is technically an unclassified and in speed restricted road, though in reality it is narrow, very uneven and Sandy but that is not to say vehicles such as quad bikes might not use it on occasion, however vehicular use is considered to be very rare.
- 6.19** The location of the site and distance to residences is considered to assure amenity generally, from factors such as noise, light and air pollution.

Foxburrow is the nearest residence immediately adjacent to the site but a wild meadow planted area has been shown as provided next to it. The applicant has provided site sections that show re-profiled golf course bunkers acting as acoustic barriers.

- 6.20** It is considered that these measures are sufficient, because the separation distance involved is greater than minima that would be considered sufficient in a residential environment and with normal behaviour that is assumed by the planning system when making judgements, then no material noise issue is considered to arise. There is no entertainment facility within the static caravan site, these being within the existing complex. The permitting of 157 caravans nearby has the potential to impact on the unusually tranquil setting of the residences on the Angles Way, but in a way no different to that which would occur if a larger parcel of land was allocated near to dwellings otherwise rural in character through the planning system so this matter is considered to carry lesser weight. Further noise assessment measures are not therefore needed.
- 6.21** The police have commented on public safety asking for perimeter security and lighting. This would need to be properly designed to avoid light pollution and to prevent disturbance to sensitive fauna. Fencing will need to be visually regressive if not to create harm. These matters can be secured by planning condition.
- 6.22** The provision of some on site charging points or the provision of infrastructure to allow charging to be installed once standards of adaptors settle could be secured by condition and thus assist with reducing greenhouse gas emissions. The applicant has accepted this. The intrinsic lower than domestic insulation standard of static caravans is considered to make over winter use less attractive so this should be limited by condition, both for environmental reasons and to restrict activity to genuine holiday activity. There is an argument that the promotion of tourism at all times of the year is an economic priority in the borough, as this proposal creates five full time jobs. It is considered that all year-round tourism activity will concentrate on hotels and guest houses of more substantial construction so a shut down period is suggested, and the applicant accepted a mid-January to half term February closure period.
- 6.23** No details of digital connectivity or on-site micro generation are provided, but not considered crucial in planning terms for holiday use. Open space is defined along with waste facilities. Further details of recycling facilities should be obtained by condition. Cycle storage is not specified but many statics feature some sort of provision and this can be clarified by condition.
- 6.24** Policy CS11 – “Enhancing the natural environment”: Seeks to work with stakeholders to avoid harmful impacts of development on biodiversity, geodiversity, landscape assets, priority habitats and species. The policy states this will be achieved by conserving and enhancing designated nature conservation sites and working with nature conservation organisations. In this

regard the concerns about cumulative scale expressed by the Broads Authority have some significance. Though the Recreational Impact can be mitigated by concluding a legal agreement to fund measures.

- 6.25** There is accepted that there is no direct impact to the Broads Authority's area's landscape character as a result of mature woodlands around the site. It is also noted in the Authority's response, the diminished incidence of Sandling landscape in intact form.
- 6.26** The small wildflower meadow near the residence has some biodiversity benefit but at a small scale relative to the overall site size, paragraph h of the policy asks for a "appropriate contribution to the creation of biodiversity and/or geodiversity features" and paragraph k to "protect and enhance landscapes and to restore landscapes", further details of this could be secured by condition as is suggested both by the County Council's ecologist's response and accepted by the applicant's letter of 18 June 2020.

The Emergent Local Plan

- 6.27** The Emergent plan removes the current adopted plan's land designation for "Tourism facilities" and in this instance the current designation covers the entire golf course.
- 6.28** The proposal will be outside the "Tourism accommodation" area in the emergent proposals map and will therefore fall under Policy L2 where tourism accommodation can be permitted providing criteria are met:

That proposals are an appropriate scale to the character of the area, availability of local services and facilities. Given the size of the tourism facility in this location, the scale of this proposal is considered bordering on inappropriate. In significant mitigation of this, the hall does provide support services as noted before, reducing the need to travel off site. The golf course and equestrian facilities are readily able to adapt to social distancing constraints and given the large outdoor space available, outside dining and drinking can in warmer weather also follow the distancing requirements currently in place.

- 6.29** While Fritton is a small secondary village, the on-site offer means the impact on the village will be relatively modest.
- 6.30** The Broads Authority have raised concerns as to the cumulative impacts on the serenity of the Broads Area and paragraph a) of the emergent policy (L2) requires that the impact of development on the character of the local countryside, particularly the tranquillity of the nationally significant Broads National Park is considered. Caravan parks are not in themselves particularly noisy and complaints seem to arise from club house and entertainment activity. Arguably therefore the static caravan accommodation proposed does not significantly add to overall Broads area disturbance and the entertainment area already exists is on the land identified as tourism accommodation in the

emergent plan being part of Caldecott Hall. Other aspects of habitat impact are compensated for by the Recreational Activity Mitigation Scheme (RAMS)

- 6.31** The emergent policy advises that small scale countryside tourism will be encouraged, but this proposal is considered to go beyond small scale. This must be set against the economic benefits to the district of bringing tourists in an providing for "staycations", which will be likely to be more prevalent as a result of the world pandemic and its likely aftershocks.
- 6.32** The Broads Authority is also critical of the quality and density of the proposal. Policy CS8 also seeks well designed schemes. Caravan parks by their form are not examples of urban design of distinction and quality and the planning system takes a subordinate role allowing the "caravan site licence" to establish layout within the site. As a result of areas set aside as under the overhead wires, the overall density is low for a caravan site. There must be demand for this form of development, and there are many similar sites around both this district and the former Waveney District.
- 6.33** The form of tenure is not something that can be conditioned in planning terms, however the maintenance of the common areas is considered assured as the developer retains an interest in the management of the park in a manner not generally found within ordinary residential environments.

7. 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 defined as a government grant such as new homes bonus or the Community Infrastructure Levy. It is noted that the Borough of Great Yarmouth does not have the Community Infrastructure Levy. Whether or not a local finance consideration is material to a particular decision will depend on whether it could help to make the development acceptable in planning terms. It would not be appropriate to make a decision on the potential for the development to raise money for a local authority. It is assessed that financial gain does not play a part in the recommendation for the determination of this application.

8. Shadow Habitats Regulation Assessment

- 8.1** The applicant has submitted a bespoke Shadow Habitat Regulations Assessment (HRA). It is confirmed that the shadow HRA submitted by the applicant has been assessed as being suitable for the Borough Council as competent authority to use as the HRA record for the determination of the planning application, in accordance with the Conservation of Habitats and Species Regulations 2017.

- 8.2** The Shadow Habitats Regulations Assessment submitted with application has been reviewed. The context of the site is that this development proposal of up to 157 static holiday caravans just northwest of the existing settlement of Fritton – a rural secondary village. The site is east of The Broads SAC boundary, and
- 8.3** The report rules out direct effects in isolation; but accepts that in-combination likely significant effects cannot be ruled out from increased recreational disturbance on the, Breydon Water SPA. The report identifies that despite the proximity of the nearby Broads SAC, recreational access (and potential for disturbance) to the SAC is extremely limited. An Appropriate Assessment (AA) has been carried out. The AA considers that there is the potential to increase recreational pressures at Breydon SPA, but this is in-combination with other projects and can be adequately mitigated by a contribution to the Borough Council's Habitats Monitoring & Mitigation Strategy (£110 per six non-dwelling bed-spaces) to ensure that there will be no adverse effects on the integrity of the internationally protected habitat sites.
- 8.4** The Borough Council as competent authority agrees with the conclusions of this assessment. To meet the mitigation requirements, it is recommended that the appropriate contribution is secured by either S.111 or S.106 agreement.

9. Concluding Assessment

- 9.1** Little weight is given to the emergent policy because of the early stage within the adoption process and the policy has been opposed in consultation. It is noted that while this site is not shown as allocated for tourism accommodation, the emergent policy does allow for accommodation outside the tourism area as shown subject to criteria. The proposal complies with existing tourism policy and designations.
- 9.2** In terms of the argument that there is an extant hotel permission, the impact of which in cumulation needs to be considered. This cumulative harm factor is considered not to carry much weight as the hotel consent was in outline and would require the determination of reserved matters at which time matters of potential cumulative impacts could be re-examined, and in addition have regard to the impact of the hotel and the later approved lodges and this proposal if here permitted. The earlier hotel approval does serve to establish a quantum of development in this vicinity deemed acceptable by the planning authority in the past, under the policies of that time.
- 9.3** The County Highways Authority's support for the application reflects that there was potential for existing traffic generation from the former land use (as the golf practice range) and the 100-bed hotel, and other subsequent developments including the lodges, so within that context the impact on the A143 junction will not be significantly greater than the former and consented uses. Correspondents have raised concern that vehicles might use narrow lanes to access the site but given the good surface of the Hall access drive, it

is not considered likely that the New Road and the unsurfaced Angles Way would be used, and no vehicular connection is shown on the plans at this point. Sandy Lane is distant and connected to the site by the Angles Way which unsuitable for vehicles.

- 9.4** While the site is directly adjacent to the Broads Area, whereas the hotel site is not, the Broads Authority response is a nuanced request for further work to mitigate material impacts, secured by condition, and the previous land use as a golf driving range would in itself have caused some disturbance and considerable issues with night time light pollution. Furthermore the 100-bed hotel approved although on other land nearby would have had some noise and disturbance potential.
- 9.5** A concern raised is that development under power lines is harmful to human health. The official British Government website gov.uk states that there is no evidence for this, admitting that there is a small possibility of some incidences of childhood leukaemia relating to this though studies are insufficient to be certain on this point. The advice concludes that other environmental issues such as poor-quality air and passive smoking are much more prevalent causes of death. It should be noted too that this proposal is for holiday use and not C3 residential use where residency would have a long-term exposure.
- 9.6** There is likely to be some impact on the nearest neighbours from noise, however bunds are provided, and separation distances are good. If this was an application for C3 residential there would be no question it was acceptable in noise terms, by virtue of distance, and noisy functions within the Hall complex are remote from these neighbours. While there will be a degree of change from tranquillity it will be to a level of disturbance considered to be low in terms of residential amenity character.
- 9.7** Where the access crosses the Angles Way, it will be necessary to carry out some consolidation works to prevent erosion of the surface, as this is a highway, the permission of the County Council will be required as landowner.

10. RECOMMENDATION: -

- 10.1** The expansion of static caravan provision at this time of economic hardship where early reinvigoration of the tourism industry will be very significant is considered to carry considerable material weight. The location of expansion within an existing "tourism facility" accords with current adopted tourism policy in most respects. The quality of what is offered, being static caravans set close together in the manner allowed by caravan site licencing does challenge the high quality requirement in terms of design, however the static vans in themselves are likely to offer good quality accommodation of its sort and the linkage to the remainder of the site provides a quality of holiday offer. Other development permitted in the past creates some precedent for this expansion. The maturely planted site offers concealment in landscape character terms. It is accepted that activity will create local disturbance but there are mitigation factors in terms of the way this operator sells vans to private owners, and the

pattern of occupation created by that, so the matter of disturbance should be accorded lesser weigh.

- 10.2** Approve – with conditions for surfacing the access, landscaping, wildlife mitigation, lighting, security fencing.
- 10.3** Conditions to limit occupation to holiday uses, with a closed period over winter.
- 10.4** A condition is required to limit caravan numbers to 157, as the application description has been shown by case law not to represent a limit unless restricted in this way, because the site licence regime determines layout whereas the planning regime determines land use alone
- 10.5** A condition to secure electric vehicle charging facilities is recommended.
- 10.6** Archaeology conditions are required
- 10.7** The design and access statement proposes using existing foul drainage. Further confirmation of the capacity of the system to accommodate the increased discharges are needed or a package system substituted, and details of this and the means to prevent grease contamination and secure ongoing maintenance before the static caravans are added to the site are required.

Background Papers 06/20/0143/F

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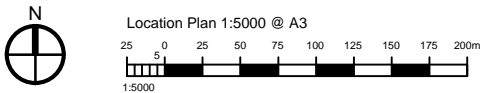
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Development Area: 7.97 ha
Access Area: 0.81 ha
Total Site Area: 8.78 ha



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CDM 2015

The Construction (Design and Management) Regulations 2015 (CDM 2015) makes a distinction between domestic and commercial clients and outlines the duties you, as client, have under Health and Safety Law (HSE).

These duties can be found at:

<http://www.hse.gov.uk/construction/cdm/2015/responsibilities.htm>

It is your responsibility as client to make yourself aware of your role within CDM 2015 and act accordingly.

163 no. Caravan sizes:

All caravan bases 11.582 x 3.658m
(38ft x 12ft)

Minimum separation between bases 6.0m

- Existing vegetation (retained)
- Existing vegetation (to be removed)
- New planting

E	Attenuation basin removed			
	REVISED BY: DO	DATE: 28.02.20	CHECKED BY: MS	DATE: 28.02.20
D	Additional plots added in open space near northern boundary			
	REVISED BY: SF	DATE: 03.02.20	CHECKED BY: MS	DATE: 03.02.20
C	Plots/layout/play area on northern boundary amended to reflect updated RPA information Location of potential attenuation lagoon removed following drainage consultation			
	REVISED BY: SF	DATE: 23.01.20	CHECKED BY: MS	DATE: 23.01.20
B	Access point amended to show single access road with footpath connections Footpaths and dog run area added, caravan plot numbers amended			
	REVISED BY: SF	DATE: 03.10.19	CHECKED BY: MS	DATE: 03.10.19
A	Plots amended following client comments Build areas, density and open space provision calculated			
	REVISED BY: SF	DATE: 26.07.19	CHECKED BY: MS	DATE: 26.07.19

PURPOSE OF ISSUE
PL - For Planning Submission

RIBA STAGE

DRAWING STATUS
S2 - Fit for Information

PROJECT TITLE
Caldecott Hall Golf Course

CLIENT
Paul Spriggins

DRAWING TITLE
Site Layout Plan

SCALE
1:2000@A3

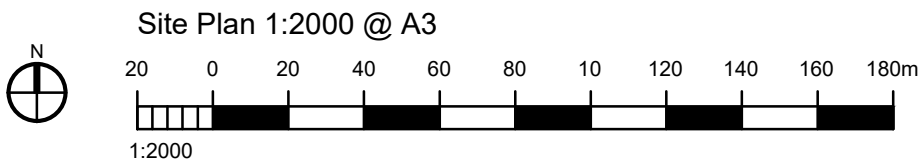
DATE July 2019	DRAWN BY SF	CHECKED BY MS	APPROVED BY DO
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DRAWING NUMBER			
PROJECT NO 0978	TYPE 00	UNIQUE NO 010	REVISION E

Lanpro

[Architecture and Urban Design]

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River Waveney

A143

A143

Fritton Lake

Fritton

A143