## Schedule of Planning Applications

Application Number:	06/23/0220/F - Click here to see application webpage
Site Location:	Hopton Holiday Village, Warren Road, Hopton on Sea, Great Yarmouth, NR31 9BW
Site Location Plan:	See Appendix 1
Proposal:	Proposed redevelopment of the existing ancillary pitch and putt golf course to provide for the installation of 110 bases for the siting of static caravans with associated landscaping, drainage and utility infrastructure, access, car parking and lighting.
Applicant:	Haven Leisure Limited C/O Agent Lichfields UK, The Minster Building, 21 Mincing Lane, London EC3R 7AG
Case Officer:	Nigel Harriss
Parish & Ward:	Hopton on Sea Parish, Bradwell South and Hopton Ward
Date Valid:	24 March 2023
Expiry / EOT date:	28 July 2023
Committee referral:	Referred to the Development Management Committee at the discretion of the Head of Planning in light of the amount of public interest in the application and issues raised therein.

**RECOMMENDATION:** APPROVE SUBJECT TO IMPOSED CONDITIONS

# <u>REPORT</u>

### 1. The Site

- 1.1 The site as part of Hopton Holiday Village is located approximately 6km south of Great Yarmouth. It is part of the settlement of Hopton that lies to its west, with Gorleston-on-Sea 3.5km north and the village of Corton 3km south. It is bound to the north by Gorleston Golf Club and open space in agricultural uses. It is bound to the east by the coastline and is bound by residential properties to the south and the west.
- 1.2 The Holiday Park is accessible via Warren Road which goes through the centre of Hopton and adjoins the A47 to the west. There is pedestrian access to Hopton Beach in the north-east and the south-east corners of the Holiday Village. In addition to the caravan pitches and holiday lodges, the Holiday Village currently includes the following facilities:
  - 1. Indoor swimming pools;
  - 2. Play Areas;
  - 3. Climbing wall;
  - 4. Adventure Golf;
  - 5. Pitch and Putt Course (within the application site);
  - 6. Woodland Walk and Ranger Activities Area (within the application site);
  - 7. Entertainment Venues;

- 8. Onsite Mini Market shop
- 9. Onsite restaurant and cafes

The Holiday Village is open from 10 March to 6 November annually for holidaymakers.

- 1.3 The 7.29 ha application site comprises a pitch and putt facility and the surrounding woodland buffer (including a woodland walk) that forms the northern boundary of the Holiday Village and is adjacent to existing holiday park caravan pitches.
- 1.4 Hopton village lies to the south-west. Residential properties comprising detached and semidetached bungalows and 2 storey houses with rear gardens are located to the south-west of the site along Potters Drive. Two bungalows at the end of Potters Drive lie directly adjacent to the site boundary, in the southwestern corner. These are separated from the pitch and putt facility by the dense woodland which extends to the perimeter of the site. To the southeast of the site, along Warren Road, there are four terraced houses situated between the existing extent of the Holiday Village to the south and west and Gorleston Golf Course to the north and east. These residential properties are accessed by Warren Road, a single lane track which widens to two lanes and goes through the centre of the Holiday Village.

# 2. The Proposal

- 2.1 The application seeks full planning permission for the: "Redevelopment of the existing ancillary pitch and putt golf course to provide for the installation of 110 bases for the siting of static caravans with associated landscaping, drainage and utility infrastructure (above and below ground), access, car parking and lighting"
- 2.2 The proposed development will provide 110 new hardstanding bases for the siting of static caravans, arranged in an informal layout arranged around three new internal roads each connecting with the existing Holiday Village roadway. One existing base will be removed to allow for the connection with existing internal road network, meaning that there will be a net uplift of 109 bases, equating to just over a 10% expansion in caravan pitches, from 1004 to 1113.
- 2.3 The development is positioned within and around the existing landscape features (established islands of tree belts and ponds). These provide natural buffer zones from the surrounding Holiday Village facilities and existing pitches.
- 2.4 The new pitches will vary in two sizes: (1). 34 no. 12' x 40' caravan bases with veranda and two car parking spaces, and (2). 76 no. 14' x 44' caravan bases with veranda and two car parking spaces. A Landscaping scheme has been prepared, integrating the new pitches within the existing Holiday Park and natural woodland features. The mature woodland boundaries around the perimeter of the site have been retained and will be enhanced through the implementation of a Woodland Management Plan.
- 2.5 The static caravans themselves are not subject to the Planning regime, and instead are covered by the Caravan Sites Acts
- 2.6 The application is supported by the following which are available on the application webpage:
  - Planning Design and Access Statement
  - Covering letter
  - Application Form

- Site Location Plan (ref. 8358\_P02\_rev B)
- Existing Site Layout (ref. 8358\_P04\_rev A)
- Proposed Site Layout (ref. 8358\_P01\_rev F)
- Proposed Landscape Layout Plan (ref. W2601\_MP01\_rev C)
- Lighting Strategy
- Proposed Lighting Plan (ref. 2700K\_LPS\_Stirrup\_rev A)
- Flood Risk Assessment
- Sustainable Drainage Report & Revision issued June 2023
- Foul Strategy Report
- Transport Assessment & Response to NCC Highways May 2023
- Landscape and Visual Impact Assessment
- Ecological Appraisal
- Bespoke Shadow HRA
- Tree Survey and Tree Retention Plan
- Woodland Management Plan (ref. W2601\_CP01\_rev C),
- Woodland Management Plan Sections (ref. W2601\_SE01\_rev A)
- Utilities Statement (various)
- Applicant response to consultee comments June 2023

# 3. Site Constraints

- 3.1 The site is located within/adjacent the following relevant planning designations
  - Development Limits (Policy GSP1) adjacent
  - Strategic gaps between settlements (Policy GSP3) within
  - Holiday Accommodation areas (Policy L1) adjacent
  - Over 2.5km Indicative Habitat Impact Zone within

# 4. Relevant Planning History

- 4.1 06/23/0316/ESN EIA Screening Opinion for proposed redevelopment of the existing ancillary pitch and putt golf course to provide for the installation of 110 bases for the siting of static caravans with associated landscaping, drainage and utility infrastructure, access, car parking and lighting. NOT EIA DEVELOPMENT
- 4.2 06/22/0388/F Proposed installation of CWS 60 cubic metre water tank with insulated tank panels; erection of surrounding close boarded timber fence and double gate. APPROVED
- 4.3 06/00/0511/F Golf village caravan communities and nine hole golf course with associated hard and soft landscaping. APPROVED
- 4.4 06/19/0372/F Variation of Condition 1 of 06/88/0488/F relating to occupation period -7 February in any year to 7 January the following year. APPROVED

- 4.5 06/17/0538/F Proposed demolition of existing tied bungalow and change of use to allow the development of 8 no. caravan bases. APPROVED
- 4.6 06/03/0779/F Extension to existing complex to allow relocation of existing aqua bar kitchen. APPROVED

## 5. Consultations

#### 5.1. Statutory Consultees

Consultee: NCC Lead Local Authority	l Flood	Response: No comments to make
Comments		acal Flood Authority (LLEA) has no commente
to make at this time.	Council as Lead	Local Flood Authority (LLFA) has no comments
Officer comment / response:	Assessment has without being su within relevant L development wil	is wholly within Flood Zone 1. The Flood Risk demonstrated the development could proceed bject to significant flood risk and complies ocal Plan policies. Furthermore, the I not result in increased flood risk to third s suitable management of surface water runoff.
Any relevant Condition / Informative note?	Include condition	n regarding surface water drainage

Consultee: NCC Historic Environment	Response: No objection; conditions.
Comments No objection but notes that there is potential fo archaeological interest (buried archaeological r application site and that their significance woul	remains) to be present within the current
investigation (WSI) to be submitted and approv	tigation and post investigation assessment has

Officer comment /	Noted
response:	
Any relevant Condition / Informative note?	Include condition

Consultee: NCC Highways	Response: No objection; condition.
Comments	
Initial comments:	

Whilst the application includes a supporting Transport Assessment, there is no information in respect of the impact to traffic movements/queuing on the check in/out day(s), nor indeed how this is managed or staggered to minimise impact. Clearly the proposal if approved would increase the number of static caravans on the Holiday Village by around 10% together with associated traffic movements thereto.

It is appreciated that not all of the caravans in the Holiday Village are rented by holiday makers, but nevertheless in order to give due assessment, I would be obliged to receive further information in respect of the changeover day(s) and the management thereof along with any considered mitigation in that respect.

Upon receipt of that information, I will be able to provide a considered response.

### Updated comments:

Further to my letter dated 17 April 2023:

I have noted the applicant's response to the query raised therein and will therefore respond to the application as follows.

It is evident that if this application is approved, there will be an increase in vehicle trips to and from the site. The existing use of the site is a matter of fact, as are the traffic movements associated thereto, and in that respect the consideration here is the cumulative impact resulting from the current application.

Access to the Holiday Village will primarily be via Station Road and then Warren Road. Station Road is subject to a 30 mph local speed limit and is designated as a Tourist Access Route within the Norfolk County Council Hierarchy; Warren Road is similarly designated and subject to 20 mph speed limit with traffic calming measures. There are appropriate waiting restrictions on both roads, although it is acknowledged that some on-street parking does occur in the vicinity of the shop adjacent to Warren Road, but that would appear to be local resident parking and/or customers for the shop. Whilst this may cause an element of disruption/inconvenience to traffic movements, but it is not directly attributable to the proposed development and is unlikely to materially change as a result or give rise to any highway safety concerns.

Having considered the supporting Transport Assessment, this indicates there would not be a significant increase in delay or capacity issues at the existing junctions. I have also noted the current system in place for change over days to manage and mitigate the effect that may arise in that respect; there is nothing to suggest that this practice would not continue.

I have also noted the proposed introduction of a Travel Plan to promote and encourage more sustainable modes of transport, notwithstanding the present accessibility to existing local public transport services, the Travel Plan would be a plan that continues to evolve.

I am aware that there is local concern in respect of this application in terms of both highways and planning consideration, and that is acknowledged that the LPA will obviously duly consider those representations. However, in terms of highway considerations I am minded that Paragraph 110 of the NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Having duly considered this application, notwithstanding the increase in vehicle movements that will arise, on balance and having regard to the local context, I do not consider that either would arise in this case and could therefore not defend a recommendation of refusal on those grounds at an Appeal.

Accordingly, whilst the LHA raise no objection, I would recommend a Travel Plan condition be appended to any grant of permission.

Officer comment / response:	Noted
Any relevant Condition / Informative note?	Include condition

Consultee: NCC Ecology Response: No objection; conditions
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Comments

Summary - No objection

An Ecological Appraisal (Baker Consultants; March 2023) and Shadow Habitats Regulations Assessment (Baker Consultants; March 2023) has been submitted in support of this application. The Ecological Appraisal is considered fit for purpose. The works must proceed in-line with the recommendations outlined in section 6 of the Ecological Appraisal report to mitigate adverse impacts on protected species.

A Woodland Management Plan (Andrew David Partnership; March 2023) and Tree Constraints, Tree Impacts and Preliminary Tree Protection Method Statement (B.J. Unwin Forestry Consultancy; March 2023) has been submitted in support of this application. The woodland management plan is broadly fit for purpose. We support the proposed opportunities to enhance the woodland area for biodiversity. It is noted that the Woodland Management Plan shows the western boundary is defined by close board fencing and a stock proof / rabbit proof fence is proposed at the northern and eastern site boundary. We recommend asking the applicant to include on the site plans that all fencing will be hedgehog friendly by providing 13cm by 13cm square gaps along fencing for hedgehogs and other wildlife to pass through.

The development is not within a Natural England nutrient neutrality catchment. The service provider, Anglian Water, has confirmed that there is adequate capacity for foul water from the site to be connected to the local sewer network.

We agree with the findings of the Shadow Habitats Regulations Assessment (Baker Consultants; March 2023) and subject to the contribution required in line with the Norfolk Green Infrastructure and Recreational Avoidance and Mitigation (GIRAMS) Strategy being secured to implement the measures to address in-combination effects of recreational pressure, there will be no adverse effects of the development proposal on the integrity of the internationally designated wildlife sites in relation to recreation. A fee of £185.93 (now £210.84) per six bed spaces is required in line with the GIRAMS. We recommend Great Yarmouth Borough Council adopt the bespoke HRA as your record of the screening for a need for an Appropriate Assessment.

Natural England have suggested further recreational provisions on the site in comments dated April 2023 and we recommend that these measures are incorporated into the site's design, where possible, to provide recreation benefits on the site including but not limited to signage/information leaflets to householders to promote walking routes within the site and/or with links to surrounding public rights of way (PRoW) and the provision of dog waste bins.

The proposed development shall proceed in accordance with the recommendations in section 6 of the Ecological Appraisal (Baker Consultants; March 2023).

Officer comment /	Noted – GIRAMS payment to be made before issue of
response:	Planning Permission (if approved)
Any relevant Condition /	Include conditions relating to Ecology and Woodland
Informative note?	Management Plan

Consultee: NCC Fire and Re	escue Service	Response: No objection
Comments Raises no objection to the ap	plication but note	s that:
The existing firefighting water fire hydrants installed where r		d to the site should be assessed and additional
Access to the new part of the Document B5.	site should be in	accordance with Building Regulations
Officer comment / response:	caravans, which	tions Document B5 are not applicable to instead are required to comply with Model (Caravan Sites and Control of Development on 5).
	and arrangemer	onfirms that the existing firefighting supplies nts on the site will be assessed, and if ted, prior to occupation of the development.
Any relevant Condition / Informative note?	Include informat	ive regarding firefighting supplies

Consultee: Natural England	Response: No objection; conditions
Company on the	

Comments

Summary - No Objection subject to appropriate mitigation.

The response notes the requirement for recreational disturbance to mitigated through contribution to the Norfolk GIRAMS; notes that proposed green infrastructure improvements and suggests additional (generic) green infrastructure provisions that could be incorporated; suggests considering incorporating wetland habitats for wildlife as part of the SuDS Strategy.

The response notes that an Ecological Appraisal (March 2023, Baker Consultants) has been included noting that NE are satisfied with the findings of the report and advising that the recommendations and ecological enhancements outlined in the report is undertaken.

Officer comment / response:	GIRAMS contribution to be made before issue of Planning Permission (if approved) and Ecological enhancements to be conditioned. Also for reference see agents response dated 2 June 2023 <u>click here (great-yarmouth.gov.uk)</u>
Any relevant Condition / Informative note?	Include condition relating to Ecology

Consultee: National Hig
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Comments

Summary – no objection

National Highways has reviewed the application and has determined that the proposed development will not have a detrimental impact on the local SRN (A47).

Upon the review of the submitted documents in support of this planning application, NH understand the proposed development seeks to expand the existing Hopton Holiday Village to provide for an additional 109 bases for the sitting of the static caravans and the associated amenities (each additional unit is set to be provided with two parking spaces, resulting in a total of 218 additional parking spaces as a result of the proposed development). Currently, the existing site provides the amenities for 1004 of these pitches and the proposed development will seek to increase the existing site by approximately 10%.

The proposed development will seek to utilise the existing Hopton Holiday Village access via Warren Road and therefore there will be no 'new' vehicle access onto the public highway from the proposed development. Also, it is noted the applicant has undertaken a review of the existing PIC data for the local highway network in the vicinity of the proposed development site which included the assessment of the A47/Lowestoft Road Roundabout. The analysis of the PIA data included within the TA did not identify any existing road safety dangers/ issues which could be exacerbated by the proposed development – NH agrees with these findings.

Based on the existing vehicular trip generation for the site (ATC count undertaken during the peak of the season), the existing site generates 276 two-way movements during the peak hour (peak hour is assumed to be between 10 am to 11am, therefore occurring outside of the network peak hours), which includes 103 arrivals and 173 departures. Based on those trips rates, the proposed development, which is equivalent to 10% of the existing site, is expected to generate up to 30 additional two-way movements during the development peak. NH agrees with the proposed trip generation and trip rates adopted by the applicant.

Furthermore, upon the review of the junction assessment for the A47, NH agrees with the outputs generated for the A47 which demonstrate the junction to have sufficient capacity (RFC of 0.40) to accommodate the increased trip generation from the expansion of the Hopton Holiday Village and the additional trips to result in a negligible impact on the SRN junction.

National Highways Planning Response (NHPR 22-12) December 2022 Similarly, we have no comments to raise on the Framework Travel Plan.

Officer comment / response:	Noted
Any relevant Condition / Informative note?	N/A

<b>Consultee:</b> Waveney, Lower Yare and Lothingland Drainage Board	Response: No objection; conditions
Comments	

No objection raised. The response requests that the proposed drainage strategy is supported by ground investigation of infiltration potential, in line with BRE Digest 365, to confirm whether surface water discharge to a water course is avoidable.

The response continues by noting that 'If (following testing) a strategy wholly reliant on infiltration is not viable and a surface water discharge proposed to a watercourse within the watershed catchment of the Board's IDD then we request that this be in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4.'

Officer comment / response:	For reference see agents response dated 2 June 2023 <u>click</u> <u>here (great-yarmouth.gov.uk)</u> As informed by Drainage Report infiltration testing will be undertaken to determine suitability of strategy or inform other means.
Any relevant Condition / Informative note?	Include infiltration testing as part of Surface Water Drainage condition

Consultee: East Suffolk Co (neighbouring LPA)	ouncil	Response: No objection	
Comments No objection to the proposed	d development.		
Officer comment / response:	Noted		
Any relevant Condition / Informative note?	N/A		

Consultee: Norfolk Consta Designing out crime Office		Response: No objection; Advice provided	
Comments			
In summary, makes a number of suggestions regarding how to prevent crime and improve security within the proposed development including further consideration of:			
a access control and monitoring of unauthorised vehicular and pedestrian access through the site.			
	b a change in road surface or obvious "symbolic barrier" to give the impression that the area		
beyond is Private/Semi-private to the general community and deter casual intrusion by non-			
residents.			
c using an effective Closed-Circuit Television System to cover the Site buildings and single			
point of entrance/exit to capture all vehicles and pedestrians entering the site, together with			
other remote access points.	4m - 1 8m ideally	weld-mesh style is installed to complement	
d a boundary treatment of 2.4m - 1.8m, ideally weld-mesh style, is installed to complement the existing vegetation.			
e the balance of openness, defensive landscaping and sufficient lighting to enable safe and			
secure use during hours of d	arkness		
Officer comment /		ee agents response dated 2 June 2023	
response:		eat-yarmouth.gov.uk) Noted, however no	
		considered necessary	
Any relevant Condition /	N/A		
Informative note?			

# 5.2. Internal Consultees

Consultee: Strategic Planr	ning	Response: No objection; advice given.
Comments The proposal is broadly compliant with local plan policies. Further information has been submitted to address concerns in relation to the strategic gap, expansion of existing holiday facilities, access, and consideration of open spaces.		
The proposal must also be screened for EIA to determine whether a full Environmental Statement will be required.		
Strategic Planning comments have been incorporated into the report.		
Officer comment / response:		lecision issued April 2023 – Not EIA see 06/23/0316/ESN
Any relevant Condition / Informative note?	N/A	

Consultee: Environmental Services	Response: No objection; conditions		
Comments Raises no objection to the proposed development.			
Requests a planning condition in relation to potential unknown contamination, requiring a remediation scheme to be submitted if contamination is found during construction.			

Requests informatives with regards to Foul Water Disposal, Construction Noise Notification and Hours of Work.

Officer comment / response:	Noted
Any relevant Condition / Informative note?	Include unknown contamination condition and informatives

Consultee: Resilience Offic	cer	Response: No objection
Comments Risk of tidal or river flooding is very low so I have no issues with this application'		
Officer comment / response:	Noted	
Any relevant Condition / Informative note?	N/A	

Consultee: Arboricultural Officer	Response: No objection; conditions
Commente	

Comments

No Arboricultural objection to the proposed development.

Notes that the woodland management provisions shows good woodland practices which will elongate the life span of the existing and new tree stock and that the landscaping proposals look suitable.

Officer comment / response:	Noted
Any relevant Condition / Informative note?	Include conditions relating to landscaping, woodland management plan and tree retention.

### 6. Publicity & Representations received

Consultations undertaken: Site notices – expiry date 28 April 2023 / Press advert – expiry date 28 April 2023

Reasons for consultation: Major development

### 6.1. Ward Member – Cllr(s) Hacon and Stonehouse

Representation	Officer Comment
Cllr Hacon (Councillor at time application submitted but no longer a Borough Councillor):	Noted
I object on behalf of the residents of Hopton. A well-attended public meeting was held in October, the minutes are attached - <u>click here (great-yarmouth.gov.uk)</u> , the meeting was attended by Jonathan Stratford and Richard Thorpe representing the developer. Hopton residents and myself would like this planning application referred to the Development Committee for all the reasons covered in the meeting. Cllr Stenhouse: No objections	
	Noted
Relevant Condition/Informative – N/A	

# 6.2. Parish Council(s) – Hopton on Sea Parish Council: Object

Representation	Officer Comment
a) With 110 new bases, split 50/50 between ownership and holiday	For reference see
rentals, this will bring a considerable amount of additional traffic through	agents response
the village. Change over days are already a nightmare, which coincides	dated 2 June
with school times. With 200 new homes being built (Lowestoft Road), on	2023 <u>click here</u>
land owned by NCC, the traffic at the A47 junction is causing congestion	<u>(great-</u>
already. The Parish Council's SAM2 data shows that some 65,500	varmouth.gov.uk)
vehicles passed along Station Road heading East in a three week period	

<ul> <li>last summer. When SAM2 was facing West, a similar number of vehicles travelled during that period. The air quality will considerably lessen.</li> <li>b) There will be an impact on mains water and the sewerage system, both of which are affected at present and will only get worse. The water pressure in the village lowers at weekends and in high season.</li> <li>c) We acknowledge potential job opportunities for local people. However, lack of staff at present to cope with holidaymakers.</li> <li>d) The loss of the golfing facilities is a blow for owners.</li> <li>e) The infrastructure is not in place to deal with the development.</li> <li>f) The existing copse should be protected and well away from caravans to ensure wildlife remains.</li> <li>g) Emergency vehicles trying to get on site, traffic jam for ambulances and fire engines.</li> <li>h) Parking is currently on one side of Station Road, making it effectively a single track road, with the possibility of an additional 200 vehicles using the road on changeover days and when holidaymakers go off-site.</li> <li>i) Facilities on site are already stretched to the limit. There are not enough staff to deal with existing holidaymakers/owners.</li> <li>j) Why are Segways being run through a nature reserve.</li> <li>k) Why are two or four person cycles being ridden on Warren Road when this is a Highway.</li> </ul>	Main points addressed in Assessment below
Relevant Condition / Informative note? - See Assessment in the body of the	is report

# 6.3. Public Representations

At the time of writing there have been a total of 81 comments received, of these 79 are objections.

Most of the objections have been made by holiday park guests / caravan owners, of which there are 68. The remaining 13 comments are from local residents, 11 of which are objections, with 1 raising no objection and 1 supporting the principle but raising some concerns. This summary is based on the content of the comments and the post codes given. There are a number of repeated themes in the comments, including concerns regarding impact upon amenity of existing caravan owners, traffic impact (and related to that pollution), loss of the golf course/ pitch and putt facility (and related to that the loss of view, green/open space, trees, and ecology), the capacity of local utilities/ infrastructure, pressure on local facilities and pressure on holiday village facilities.

### **Objections / Concerns:**

Representation	Officer Comment

<b>Traffic</b> There are 46 responses that raise concerns regarding transport and traffic from both residents and park owners/guests. Respondents were primarily concerned about the increase in traffic on Warren Road and Station Road and the impact this could have on road safety, including emergency vehicle access in particularly on change of over days / times.	The application was supported by a Transport Assessment which undertook highways impact surveys. The Transport Assessment (TA) concludes (at para 6.8) that there will be only a modest increase in two-way trips (30 at peak hour, 10-11am) at the holiday park and that the impact of the vehicle trips caused by the development on the highway network will be negligible. This assessment is supported by the responses from NCC and National Highways both of whom have no objection to the proposed development and concluded that the proposed development will not have a detrimental impact on the local Strategic Road Network (SRN).
Relevant Condition/Informative - Condition Travel Plan as discussed above	

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Representation	Officer Comment
Pollution A total of 6 responses raised concerns about the development resulting in increased pollution and worsening local air quality, because of increased traffic movements.	The application has been supported by a Transport Assessment which demonstrates that there will be only a modest increase in the number of trips to and from the Holiday Village. Given this modest increase the application submission has not included an assessment of the impact on local air quality in terms of human health, however air quality impacts were considered from ecological perspective as part of the shadow HRA submitted with the application. This concluded (para 4.5.18) that likely significant effects on air quality from increased traffic can be ruled out.
Relevant Condition/Informative – N/A	

Representation	Officer Comment

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Loss of Golf Course A total of 24 comments related to the loss of the existing 9 hole par 3 course, including as an amenity and the reason why guests come to the site, bought caravans on the site etc.	Retention, or otherwise, of the course is a commercial decision for the holiday park which has been weighed against the opportunity to provide a greater choice of accommodation and to drive investment in the wider park. The proposed loss of the facility raises no conflict with policy, as confirmed within Great Yarmouth Borough Council's Strategic Policy team's consultation comment which note that it is, 'unlikely that the loss of the facility will result in any significant change in the demand for golf facilities', and that 'the facility cannot be considered as being public open space under Policy E3 as it was not available to the local community'. This policy assessment is consistent with the assessment in the Planning Statement (Paras 8.4-8.7).
Relevant Condition/Informative - N/A	

Relevant Condition/Informativ

raised concerns in relation to the proposed development's ecological impacts. Site's and the level	application was supported by an ogical Appraisal which concluded that the lopment will not give rise to any significant rse impacts on sensitive ecological otors, (para 1.3.1). In its present form, the s features offer limited ecological value
to be cours Cons Coun applie adver on the desig recrea in line and F	he Ecological Appraisal found only a low of nature conservation interest on the given that most of the site area proposed developed on comprises a pitch and putt se (para 1.2.1). ultation comments for Norfolk County neil Ecology raise no objection to the cation and confirm that there will be no rse effects from the development proposal e integrity of the internationally nated wildlife sites in relation to ation (subject to the contribution required e with the Norfolk Green Infrastructure Recreational Avoidance and Mitigation AMS) Strategy).

Relevant Condition/Informative -

GIRAMS payment to be made before issue of Planning Permission (if approved)

Representation	Officer Comment	
Loss of Green Space / Loss of Trees There were 15 comments received in relation to the loss of green space and trees as a result of the proposed development.	The application is supported by an Ecological Appraisal and Woodland Management Plan which demonstrate how the existing site will be enhanced through increased planting and ongoing maintenance, resulting in an uplift in biodiversity at the site. Additionally, the retained copse/ woodland will be enhanced and maintained as set out in the Woodland Management Plan.	
	The internal consultee response from Arboriculutral Officer raised no objections to the proposal and notes that the woodland management provisions show good woodland practices which will elongate the life span of the existing and new tree stock and that the landscaping proposals look suitable.	
Relevant Condition/Informative -		
Condition Ecology and Woodland Management Plan		

Representation	Officer Comment	Relevant Condition
		Informative
<b>Pressure on Local Facilities</b> 21 of the comments raise concerns regarding the pressure that the additional holiday makers will have on local shops, facilities, and services (including the local hospital).	There is no evidence to suggest that the additional guests will have an unacceptable impact on local facilities and services. Indeed for many local businesses the expansion of the holiday park represents an opportunity for additional customers.	N/A
Pressure on Holiday Village Facilities 47 of the comments received raised concerns regarding the pressure that the development would place on facilities within the Holiday Village and making reference to difficulties accessing on park facilities during peak times.	With regards to pressure on facilities within the Holiday Village, Haven have indicated that they regularly review the facility and entertainment offer and are currently adding further options and pop-up refreshments in addition to reviewing the use of different existing buildings. Additional entertainment has recently been provided in the Restaurant & bar area at weekends and at peak times to address demand. In addition, the business now offer two holiday offerings 'Haven Holidays' (with access to all the facilities an entertainment) or 'Haven Hideaway' (with access to the restaurant, bar & supermarket only). Haven have acknowledged that there were staffing shortages in food and beverage positions during 2021/2022 following the pandemic not just at Hopton but nationwide, however with covid now in the past and the job market being more balanced this has apparently now been resolved.	N/A
<b>Construction</b> There were 2 public comments received in relation to the proposed development's potential impacts during the construction phase.	Environmental Services provided comments on the proposal and requested informatives with regards to Foul Water Disposal, Construction Noise Notification and Hours of Work being put in place should permission be granted.	Add proposed informatives

# Support:

Representation	Officer Comment	Relevant Condition/Informative
1 in principle no concerns to the additional bases but raised concerns regarding infrastructure and traffic	Discussed in Objections / Concerns above	N/A

### Comment / observations:

Representation	Officer Comment	Relevant Condition/Informative
1 no objections – stating e live very close to the site and have no issues with the camps plans. It would be beneficial for more employment and for bringing more customers to the local businesses	N/A	N/A

### 7. Relevant Planning Policies

### The Great Yarmouth Core Strategy (adopted 2015)

### Add & Delete as necessary

- Policy CS1: Focusing on a sustainable future
- CS2: Achieving Sustainable Growth
- CS6: Supporting the local economy
- CS8: Promoting tourism, leisure and culture
- CS11: Enhancing the natural environment
- CS13: Protecting areas at risk of flooding or coastal change
- CS14: Securing appropriate contributions from new developments
- CS15: Providing and protecting community assets and green infrastructure
- CS16: Improving accessibility and transport

### The Great Yarmouth Local Plan Part 2 (adopted 2021)

- Policy GSP1: Development Limits
- GSP3: Strategic gaps between settlements
- GSP5: National site network designated habitat sites and species impact avoidance and mitigation
- A1: Amenity
- L1: Leisure and tourism
- L2: New or expanded tourist facilities outside of development limits and holiday accommodation areas
- E1: Flood Risk
- E3: Protection of open spaces

- E4: Trees and landscape E6: Pollution and hazards in development
- I1: Vehicle parking for developments
- 13: Foul drainage

## 8. Other Material Planning Considerations

National Planning Policy Framework (July 2021)

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

### 9. Planning Analysis

- 9.1. Legislation dictates how all planning applications must be determined. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 9.2. Section 70(2) of the Town and Country Planning Act 1990 (as amended) states: *In dealing with an application for planning permission the authority shall have regard to–*

(a) the provisions of the development plan, so far as material to the application, (aza) a post-examination draft neighbourhood development plan, so far as material to the application,

(b) any local finance considerations, so far as material to the application, and (c) any other material considerations.

This is reiterated at paragraphs 2 and 47 of the National Planning Policy Framework.

#### Main Issues

The main planning issues for consideration include:

- Principle of development
- Design and impact on surrounding area and amenity
- Ecology
- Flood risk, surface water and foul drainage strategy
- Access and highway safety
- Economic benefits
- Heritage

### Assessment of:

Proposed redevelopment of the existing ancillary pitch and putt golf course to provide for the installation of 110 bases for the siting of static caravans with associated landscaping, drainage and utility infrastructure, access, car parking and lighting.

# 10. <u>Principle of Development</u>

10.1 The Site is adjacent but outside development limit [policy GSP1], adjacent but outside holiday accommodation area [policy L1], and within a 'strategic gap' seeking to maintain a gap between the settlement of Hopton and Gorleston to the north [policy GSP3]. In respect of the latter, the current site use as a golf course [pitch and putt facility] in connection with the existing adjacent holiday accommodation is contained by an existing tree belt which to the north and west is about 20 m deep and the proposed extension of holiday accommodation is unlikely to impact greatly on the strategic gap in terms of character and openness. This is further discussed below.

# Visitor accommodation expansion

- 10.2 The expansion of holiday accommodation outside both the development limit and holiday accommodation area is considered in light of policies CS8 and L2 together with their detailed criteria which encourages new or expanded [as is the case here] tourism development outside of urban areas and in more rural locations where they are appropriate to the scale and sensitivity of the location. In this respect the settlement of Hopton is identified as a Primary Village under policy CS2. The settlement has a good range of services and facilities, with access by car and public transport to services and facilities just to the north. Hopton is already an established holiday destination with a substantial amount of accommodation provided between two main operators, one being the applicant. The scale of development is considered acceptable in this regard.
- 10.3 Policy L1 aims to manage, support and improve the accommodation and facilities within the Holiday Accommodation Areas. The absence of this designation from the site does not preclude the development of holiday accommodation; indeed, Policy L1 notes that 'New or expanded holiday accommodation that is developed over the plan period which is located outside of the identified 'Holiday Accommodation Areas' will be treated as being a Holiday Accommodation Area once complete for the purposes of this policy'.

# Strategic gap

10.4 Policy GSP3 of the Local Plan requires the gap between Gorleston-on-Sea and Hopton-on-Sea to be protected from development which individually or cumulatively, significantly reduces either the physical size of the gaps themselves, their general openness or, where relevant, their rural character. The impact of the proposal has been assessed in the Landscape Visual Impact Assessment which concludes (at para 9.2.1 on p. 17) that: "*The distinctive gap between Gorleston-on Sea and Hopton-on-Sea would be maintained; the proposals relating to the application site are situated on a pitch and putt facility that forms part of the existing holiday village and would not significantly reduce the size of the strategic gap, the retention of the woodland planting to the application site will maintain the character of the view and the existing agricultural and private golf course land uses will not be adversely affected."* 

# Pitch and putt facility

10.5 The existing pitch and putt facilities are only available for use by park guests and caravan owners. As a result, this facility does not provide a local amenity or recreational benefit to the local community which would need to be assessed under

GYLP2 Policy E3. NPPF para 99 states that existing open space, sports and recreational buildings and land should not be built on *unless*:

a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or

*b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or* 

c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

10.6 In applying the above criteria, the following should be noted:

1. the pitch and putt area is a facility within and forming an ancillary part of a Holiday Park.

2. It is a private holiday park facility only for the use of guests and owners staying at the holiday park between March and November; it is not available to local residents or other visitors to use.

3. The pitch and putt facility is lightly used with average daily summer usage (i.e. peak period between July and September last year) being 17 players a day, with the average daily use in each week ranging from 11 to 33 players.

4. It is a holiday park pitch and putt facility (not a full golf course) with hole lengths typically around 100 yards (90m).

5. A golf course is provided by the adjacent Gorleston Club Golf Course, with holes ranging from 166 yards to 529 yards and are on average 347 yards.

Furthermore, the Hopton Holiday Village pitch and putt facility is not identified as forming part of the existing stock of golf course provision within the Great Yarmouth Borough Council 'Sport, Play and Leisure Strategy 2015-2029' (published 2015).

This Strategy notes (para 5.38) that the existing levels of golf course provision are "...considered generally adequate to meet both existing and potential increases in demand arising from development initiatives and demographic changes, it is considered likely that the existing stock of facilities would remain sufficient and that no further golf courses and related facilities will be required in the Borough up to 2029".

It also states: (para 5.33) that "no evidence of latent demand has been identified through the club survey. From information obtained from local clubs, none appear to have waiting lists for membership (where membership is required to play)"

- 10.7 In conclusion, the proposal is considered acceptable in principle as there is no material conflict with local plan policy. The 110 new caravan pitches proposed represents a modest 10% increase in the scale of the pitch provision at the Hopton Holiday Village and well within the Caravan Site License pitch cap (1743 static caravans and 40 touring caravans), in accordance with local plan policy encouraging the enhancement of existing visitor accommodation. It will provide an alternative acceptable recreational use (caravan pitches instead of a pitch and putt course) on the site, in accordance with the tests set out in NPPF para 99.
- 10.8 The development is to be sited within a visually enclosed part of the existing operational area of the Holiday Park and would therefore maintain the distinctive gap

between Gorleston-on Sea and Hopton-on-Sea through the retention of the woodland planting on the site's perimeter.

10.9 As such the proposal is considered to accord with Policies CS8, GSP3 and L2.

## 11. <u>Design</u>

11.1 The following policies are relevant in this regard:

Policy CS9 amongst other things requires development proposals to deliver high quality, distinctive places to attract businesses, visitors and retain residents. Proposals should respond to the surrounding area's distinctive natural, built and historic characteristics with attention to the scale, massing and materials. They should promote positive relationships between existing and proposed buildings, provide safe access and suitable parking whilst seeking to conserve and enhance biodiversity and landscape features.

Policy CS11 states that development should avoid any harmful impacts on the borough's biodiversity, geodiversity, landscape assets, priority habitats and species and take suitable measures to mitigate harmful impacts where unavoidable.

Policy GSP6 ensures that development aims to "strengthen and extend the area's Green Infrastructure network", to maximise the boroughs benefits of nature conservation and resilience to current and future ecological changes.

Policy E4 seeks for development to retain trees and hedgerows and landscape features which contribute significant value to the character, amenity or ecology to the locality and to take opportunities to enhance those features, commensurate with the scale and nature of the development. Developments should also include landscaping schemes as appropriate to the size and nature of the development to mitigate impacts and enhance the local landscape character.

Policy L2 sets out the planning considerations for the expansion of tourist accommodation outside of Development Limits and Holiday Accommodation Areas, nothing that these are acceptable where they comply with the following three criteria:

a) "are an appropriate scale to the character of the area, availability of local services and facilities, and hierarchical level of the nearby settlement;

b) individually and cumulatively do not significantly change the character of the local countryside, landscape or (where applicable) settlement; and

c) do not have a significant adverse impact on the living conditions of adjoining occupiers

Also of relevance is Policy E6 pollution and hazards in developments - including light pollution.

### Landscape

11.2 The site area is relatively level requiring little if any regrading and the proposal incorporates a layout that retains the outer tree belt and most internal tree groups and hedgerows and proposes additions and enhancements to the existing landscaping to provider greater connectivity. Some copse areas will be reduced in size to

accommodate the layout but this will be mitigated by replacement tree planting, hedgerow planting, amenity and wildflower planting which will be secured by condition. An added material benefit to the proposal is the advancement of a Woodland Management Plan relating to the perimeter woodland that screens the application site to the north, east and west and plays an important role in maintaining the strategic gap by way of a landscape buffer. This woodland was planted as part of a landscaping scheme relating to planning permission 06/00/0511/F - Golf village caravan communities and nine-hole golf course with associated hard and soft landscaping. No long-term management and maintenance were secured for the tree belt as part of this earlier permission.

11.3 The Woodland Management Plan outlines substantial enhancements to the existing wooded area (page 35). The long-term maintenance of the woodland is outlined within the Woodland Maintenance and Operations Schedules within the Woodland Management Plan. The schedules outline the key responsibilities and operations in maintaining the woodland for the period of two to five years, and the ongoing maintenance from years six onwards. Following practical completion of the proposed development, these maintenance plans aid the establishment and the longevity of the woodland, whilst also ensuring the continued enhancement of the site's biodiversity, ecology and visual setting. This will be secured by condition.

# Character and amenity effects

- 11.4 Policy L2 criterion a is complied with as discussed in the section Principle of Development above. In terms of criterion b, the site is self-contained and the retained tree belt together with its enhancement and long-term management mean that the character and landscape of the local countryside wont significantly change. The landscape and visual impact of the proposed development on the surrounding area has been assessed in detail in the Landscape and Visual Impact Assessment (LVIA) which concludes (at p.18) that there would be 'no significant change in the character of the local countryside, in terms of design, lighting, boundary treatment, the landscape, nightscape, adjoining occupiers and protected sites'. In terms of lighting, 1m high solar down lights are proposed fronting each base and there will be 7 no. 5m wired streetlights at key locations for junctions, turning heads and gaps between bases. These are all down lighters with no upward light spill and horizontal light spread limited to 3.8m and 12m respectively. In terms of the settlement as a whole, there will be additional traffic movements to and from the site and these are discussed under section Access/Highway below.
- 11.5 In terms of criterion c of policy L2, it is considered that the proposal will have no significant adverse impacts on the amenities of adjoining occupiers outside of the holiday park site given the site is well contained as discussed above. The base layout is also considered acceptable in relation to the existing and adjoining layout of caravans.
- 11.6 The proposal therefore accords with the Local Plan policies CS9, CS11, GSP6 and E4 and accords with policies L2 and E6 as well.

# 12. <u>Ecology</u>

12.1 The following policies are relevant:

Policy CS1 sets out that development proposals should protect the Boroughs biodiversity and unique landscapes.

Policy CS11 states that development should avoid any harmful impacts on the borough's biodiversity, geodiversity, landscape assets, priority habitats and species and take suitable measures to mitigate harmful impacts where unavoidable.

Policy GSP6 ensures that development aims to "strengthen and extend the area's Green Infrastructure network", to maximise the boroughs benefits of nature conservation and resilience to current and future ecological changes.

- 12.2 The Ecological Appraisal (EA) of the site included Preliminary Ecological Appraisals and Phase 2 site surveys. In its present form, the site's features offer limited ecological value and the EA found only a low level of nature conservation interest on the site, given that most of the site area proposed to be developed on comprises a pitch and putt course. The EA notes that the habitats with the greatest value to breeding birds within the site are the perimeter woodland, edge habitats & small waterbodies. The proposal has been designed to retain and enhance the woodland and edge habitats and retain the waterbodies. As a result, the EA report concludes that the proposal will have no significant adverse impact on breeding birds and no further assessments or surveys are considered necessary. Enhancement measures, including additional planting in the woodland areas, active management of the retained woodland and inclusion of new bat and bird boxes will provide increased opportunities for biodiversity at the site. Both Natural England and The Councils Ecology advisors are satisfied with the EA subject to the recommendations and ecological enhancements being undertaken - these will be secured by condition.
- 12.3 The EA also referred to the Woodland Management Plan measures include tending to dead trees, pruning overcrowded areas and removal of brambles areas and ivy. The existing woodland boundaries are then to be supplemented with new native planting. The existing woodland trail around the perimeter of the site will also be enhanced through the installation of a timber edge and mulch footpath, replacement of broken fencing to secure the site and reuse of cut materials to create log piles and interpretation seating in appropriate areas. Formalising the footpath and reinforcing the boundaries of the woodland area will likely encourage sensitive use of the trail and work to protect and enhance the existing woodland trees and plants. Based on the proposal and measures outlined within the Woodland Management Plan, the EA concludes that the development will be able to offset a minor loss of plantation woodland (there will be a small loss of <25% of the small fairway copses to allow for the development footprint) and, overall, have a positive impact on the woodland habitats on site.
- 12.4 A 'shadow' Habitats Regulations Assessment (sHRA) was submitted assessing the proposed development against the requirements of the 2017 Habitat Regulations. The assessment considers that there is potential for recreational disturbance impacts to lead to a likely significant effect on the Norfolk Habitats sites that overlap with the GYBC boundary. However, to mitigate the effects of the proposed development a developer contribution will be secured in accordance with Policy GSP6 if the development is resolved to be approved.
- 12.5 The proposal therefore accords with Local Plan policies CS1, CS11 and GSP6. The sHRA finds, with mitigation (developer contribution), there will be no harm to the integrity of any Habitats sites.

# 13. Flood Risk and Drainage

13.1 The following local policies are relevant:

Policy CS13 encourages new development proposals to be directed away from areas of high risk flooding (zones 2, 3a and 3b)

Policy I3 sets out that development proposals are required to demonstrate that adequate foul water treatment and disposal infrastructure already exists; or that the necessary infrastructure can be provided in time to serve the proposed development

- 13.2 In terms of surface water, the site is wholly within flood zone 1 where development is directed avoiding areas at higher risk. Ground conditions are such that there is the likelihood that surface water can be disposed of by infiltration which is in line with the Drainage Hierarchy being high up the hierarchy to mimic natural drainage. The strategy explains that Individual caravans and associated parking spaces will be served by underground cellular storage tanks where storm water will be attenuated prior to discharge into the surrounding strata. Runoff generated by introduced access roads will be attenuated by use of voided subbase construction prior to discharge into the surrounding strate.
- 13.3 In terms of foul drainage, the Foul Strategy Report assesses the foul flows that will result from the proposed development against the foul sewerage infrastructure that will serve the Site. It concludes that a foul drainage solution can be delivered without introducing additional flood risk to the area. The service provider, Anglian Water, has confirmed that there is adequate capacity for foul water from the site to be connected to the local sewer network.
- 13.4 In terms of Nutrient Neutrality the site is within a Water Recycling Centre Network Draining Outside of Nutrient Neutrality Catchment so avoids an impact in that respect.
- 13.5 The proposal therefore complies with local plan policies CS13 and I3.

# 14. Access and Highways impacts

14.1 The following policies are relevant in this regard as well as the NPPF section 9 Promoting sustainable transport:

Policy CS16 (Improving Accessibility and Transport) and

Development Management Policy I1 (Vehicle Parking for Developments).

NPPF: para 104 - Transport issues should be considered from the earliest stages of plan-making and development proposals, and

Para 111 - Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

- 14.2 A Transport Assessment (TA) and Travel Plan (TP) have been prepared including an assessment of trip generation, this followed pre-application advice sought from Norfolk County Council as Highway Authority.
- 14.3 The TA concludes (at para 6.8) that there will be a modest increase in two-way trips at the holiday park and that the impact of the vehicle trips caused by the development on the highway network will be negligible. Therefore, the proposed development will not result in any significant adverse impact on residential amenity or highway safety due to increased traffic in Hopton.
- 14.4 In terms of the development's potential impact on specific local road junctions, junction assessments were carried out at two of the main junctions that serve the holiday park to assess the likely level of impact on them as a result of the proposals. 'Junction one' being Lowestoft Road and Station Road and 'Junction two' being the A47 and Station Road. Both junctions are to the west of the Holiday Village and provide access into and out of the village of Hopton. 12.7 The TA concludes that there would be a negligible increase to both delay and the 'ratio of flow to capacity' (RFC) at the Station Road and Lowestoft Road Junction (para 5.17). Similarly, the TA concludes that the development would result in an imperceptible level of change to the existing queuing and delays experienced at the A47 / Station Road Junction (para 5.21).
- 14.5 A Travel Plan has been prepared to sustainably manage the modest increase in two way trips to the Holiday Park, promoting safe and sustainable travel to and from the Site. The recommendations (para 2.9) promote increasing travel by transport methods other than single-occupancy car and target an increase in car sharing, public transport use, cycling and walking by staff and visitors.
- 14.6 Norfolk County Council sought additional information in respect of the proposals to further inform their consideration of the proposal this took the form of a note responding to the changeover management strategy operated by the Holiday Village.
- 14.7 The detailed consultation comments of both Norfolk County Council (responsible for adopted local highway network) and National Highways (responsible for Trunk Road network) are set out in section 5.1 above. Both consultees raise no objections to the proposal, each providing their assessment as to how their 'no objection' comment was determined. In respect of the comments from Norfolk County Council these are subject to the Travel Plan being conditioned.

# Parking Provision

- 14.8 Policy I1 requires development to provide vehicle parking in line with the most up to date standards published Norfolk County Council. The 'Parking Guidelines for new developments in Norfolk 2012' suggests a maximum provision of 2 spaces for a 2 or 3 bedroom unit (p. 20). Policy I1 also notes that development should also be designed to enable charging of plug-in and other ultra low-emission vehicles in safe, accessible, and convenient locations.
- 14.9 All of the proposed 109 additional caravan pitches will be provided with two parking spaces alongside the pitch. The proposed parking provision of one to two spaces per caravan is typical practice, with additional parking for visitors near the main reception and site entrance (as identified in TA Figure 3-6). The TA concludes (para 4.10) that the proposed parking provision is sufficient, including for the peak operational season, and that on street parking on the local highway is not expected to result from the development.

- 14.10 All proposed pitches will be provided with "passive electric vehicle charging provision" so that this can be provided as demand increases passive provision is when the necessary underlying infrastructure (e.g. capacity in the connection to the local electricity distribution network and electricity distribution board, as well as cabling to parking spaces) is in place to ensure simple installation and activation of a charging point at a future date. Hopton Holiday Village currently provides electric vehicle parking bays in the main car park, accommodating the charging needs of visitors.
- 14.11 The highway impacts of the proposal in terms of residential amenity and highway safety are acceptable and residual cumulative impacts on the road networks would not be severe and therefore the proposal accords with Policies CS16 and I1.

# 15. <u>Economic benefits</u>

15.1 The application is supported by a Planning Design and Access Statement which includes in section 13.0 an assessment of the development's economic benefits – to see the information <u>click here (great-yarmouth.gov.uk)</u> This includes estimated figures for: on-site and off-site spending; during construction; and during operation. These figures have not been independently assessed but there is no reason to doubt the economic benefits that will arise both through construction and thereafter and the resultant benefit to the tourism sector. These matters are a material consideration which can be attributed weight in the decision-making process and in taking a balanced judgement these benefits support Policies CS6 – supporting the local economy and CS8 – promoting tourism, leisure and culture.

# 16. <u>Heritage</u>

- 16.1 There are no designated or known undesignated heritage assets affected by the proposed development. However, Norfolk County Council Historic Environment has commented in section 5.1, no objection but notes that there is potential for previously unidentified heritage assets with archaeological interest (buried archaeological remains) to be present within the current application site and that their significance would be affected by the proposed development.
- 16.2 Therefore, if planning permission is granted a planning condition is proposed requiring written scheme of investigation (WSI) to be submitted and approved and that the development shall not be occupied or put into first use until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the WSI

# 17. <u>Other Matters</u>

Use of Planning Conditions to control occupancy of visitor facilities for holiday accommodation.

17.1 The planning history reveals that there are different holiday occupancy restrictions in force by condition across different parts of whole holiday park site; these are quite old permissions and the occupancy conditions do not reflect current guidance of local plan policy:

a) 06/00/0511/F - Golf village caravan communities and nine hole golf course with associated hard and soft landscaping

Condition No. 6 states –

The units of accommodation hereby approved shall not be used other than for holiday purposes and shall not be occupied between the 15th January and the last day of February.

The reason for the condition is:-

For the avoidance of doubt, as the application site is not within an area allocated for residential development.

b) 06/19/0372/F - Variation of Condition 1 of 06/88/0488/F relating to occupation period - 7 February in any year to 7 January the following year

Condition no. 2 states -

The caravans/chalets/lodges shall only be used for holiday purposes only and may only be occupied as holiday accommodation during the period between the 7th February of any year to the 7th January the following year.

The reason for the condition is:-

The application site is within a Prime Holiday Site where the Local Planning Authority intend that new dwellings whether a permanent or a temporary nature will only be used for holiday accommodation.

Condition no. 3 states -

The caravans/units/lodges/chalets shall be used for holiday purposes only and shall not be used as a sole or main residence for any individual or family.

The reason for the condition is :-

To ensure the units are not used as permanent residential accommodation.

Condition no. 4 states -

The owners/operators shall maintain an up-to-date register of the names of all owners/occupiers of individual caravans/log cabins/chalets/lodges on the site, and of their main home addresses, and shall make this information available at all reasonable times to the local planning authority.

The reason for these conditions is:-

To ensure that approved holiday accommodation is not used for unauthorised permanent residential occupation. The register required shall normally be collected by the caravan site licence holder or his/her nominated person.

c) 06/17/0538/F - Proposed demolition of existing tied bungalow and change of use to allow the development of 8 no. caravan bases

Condition no. 5 states -

The caravans shall only be used for holiday purposes and may only be occupied during the period from 1st March to 31st December in any year and

for 10 days before and 10 days after Christmas and at weekends (noon on Fridays to noon on the following Monday) during November and December in any year.

The reason for the condition is:-

The application site is within a Prime Holiday Site where the Local Planning Authority intend that new dwellings whether a permanent or a temporary nature will only be used for holiday accommodation.

Condition no. 6 states –

The accommodation units shall be used for holiday purposes only and no unit shall be occupied for more than 28 days at any one time without the prior written approval of the Local Planning Authority.

The reason for the condition is :-

The site is located outside any area allocated in the Great Yarmouth Borough Wide Local Plan 2001 for permanent residential development and permanent occupation would therefore be contrary to Policy HOU10 of the plan.

17.2 The existing holiday park (except for the pitch and putt course the subject of this application) is within Local Plan Holiday Accommodation area L1. This Policy along with Policy CS8 – Promoting tourism, leisure and culture, 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.

For the purposes of Policy L1 it states that 'New or expanded holiday accommodation that is developed over the plan period which is located outside of the identified 'Holiday Accommodation Area' will be treated as being Holiday Accommodation Area once complete for the purposes of this policy'.

17.3 Having regard to the above, it is not considered either necessary or reasonable in relation to the current application to impose a condition which seeks to restrict occupancy by reference to excluding occupation during a specific date range or season and in line with current national guidance the condition should simply specify the permitted accommodation should be used for holiday use only and not for permanent residential accommodation. A further condition requiring the operator to keep a register of the owner and occupiers of each caravan and their main home address is also considered reasonable. These have been set out as conditions 11 and 12 in the recommendation below.

# 18. Local Finance Considerations

18.1 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 (which is not applicable to the Borough of Great Yarmouth). 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, for example. There do not appear to be any planning-related local finance considerations linked to this development.

# 19. <u>The Planning Balance</u>

- 19.1 The proposal will provide 109 net additional bases for the siting of static caravans and associated infrastructure for visitor accommodation.
- 19.2 The proposal will result in the loss of an existing pitch and putt facility for use by park guests and caravan owners, but as outlined in the assessment above this is a private facility and does not provide the local amenity or recreational benefits to the local community which would need to be assessed under Policy E3 Protection of open spaces; and the loss of the facility on-site is considered to be outweighed by the wider economic and tourism benefits.
- 19.3 Overall, it is considered that, on balance, the application is acceptable for conditional approval as recommended below.

# 20. <u>Conclusion and Recommendation</u>

20.1 For the reasons identified in the assessment above, it is considered on balance that the application should be approved in accordance with the recommendation below.

### **RECOMMENDATION:**

It is recommended that application 06/23/0220/F should be APPROVED subject to:

 Prior receipt of the payment of the planning contribution towards the Habitats Mitigation in accordance with the GIRAMS strategy and Habitats Regulations: 109 x £210.84 = £22,981.56 (or an alternative planning obligation mechanism first being agreed and completed to secure receipt prior to first use of the development)

### And;

# (ii) The following Conditions:

### Proposed Conditions

1. The development must be begun not later than three years beginning with the date of this permission.

The reason for the condition is :-

The time limit condition is imposed in order to comply with the requirements of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development shall be carried out in accordance with the following plans and document:

- Site Location Plan with Highway Annotation Drawing No. P05 Rev C
- Proposed Static Caravan Bases Layout Drawing No. P01 Ref F

- Framework Travel Plan prepared by Integrated Transport Planning Limited, ref 3966 version 1-1 dated February 2023

- Woodland Management Plan prepared by Andrew Davis Partnership, ref W2601 version 3 dated March 2023 including:

Drawing no. CP01 Rev C Woodland Management Plan; Drawing No. MP01 Rev C Proposed Landscape Layout Plan

- Tree Constraints, Impacts and Protection Method Statement prepared by B.J.Unwin Forestry Consultancy, dated March 2023 including:

Drawing No. HHVTRP-MAR23 Tree retention and Protection Plan

- Ecological Appraisal prepared by Baker Consultants , ref 1593.02 dated March 2023
- Lighting Strategy Proposal Specification dated December 2022 including:

Drawing No. N/A - 2700K LPS Stirrup

The reason for the condition is:-

For the avoidance of doubt.

A) No development shall take place until an archaeological written scheme of investigation has been submitted to and approved by the local planning authority in writing. The scheme shall include an assessment of significance and research questions; and 1) The programme and methodology of site investigation and recording,
 2) The programme for post investigation assessment, 3) Provision to be made for analysis of the site investigation and recording, 4) Provision to be made for publication and dissemination of the analysis and records of the site investigation, 5) Provision to be made for analysis of the analysis and records of the site investigation and 6) Nomination of a competent person or persons/organization to undertake the works set out within the written scheme of investigation.

and,

B) No development shall take place other than in accordance with the written scheme of investigation approved under condition (A).

and,

C) The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the archaeological written scheme of investigation approved under condition (A) and the provision to be made for analysis, publication and dissemination of results and archive deposition has been secured.

Reason for condition: -

To secure a programme of archaeological mitigatory work in accordance with Policy CS10 of the GYBC Local Plan Part 1XXX.

4. All approved tree protection measures detailed by Tree Constraints, Impacts and Protection Method Statement prepared by B.J.Unwin Forestry Consultancy, dated March 2023 including Drawing No. HHVTRP-MAR23 Tree retention and Protection Plan are to be installed prior to the commencement of development work to implement this planning permission.

The approved tree protection measures are to be maintained in good condition and adhered to throughout the construction period. Unless otherwise agreed in writing by the Local Planning Authority, no construction-related activities (for example: storage and/or siting of: vehicles, fuel, materials, site huts or other buildings or ancillary equipment; raising of lowering of ground levels; installation of underground services, drains; lighting of fires etc.) may be undertaken within the identified Construction Exclusion Zones and fenced areas.

In the event that any tree(s) become damaged during construction, the Local Planning Authority shall be notified, and remedial action agreed and implemented. In the event that any tree(s) dies or is removed without the prior approval of the Local Planning Authority, it shall be replaced within the first available planting season, in accordance with details to be agreed with the Local Planning Authority.

The reason for the condition is :-

To ensure existing trees are protected during site works in the interests of the visual amenity of the area and the satisfactory appearance of the development in accordance with Policy CS11 of the GYBC Local Plan Part 1 and Policy E4 of the GYBC Local Plan Part 2.Etc etc.

5. No development other than the works required for the laying of foundations for caravan bases shall begin until full details of the means of surface water drainage and management and maintenance thereof, have been submitted to and agreed in writing with the local planning authority. The details should include the results from percolation tests to demonstrate the feasibility of a drainage strategy based on infiltration as per the recommendations of the Sustainable Drainage Report prepared by Pell Frischmann (June 2023). If, after infiltration testing has taken place, it is found that infiltration is not feasible then exploration of outfall to a watercourse or other means should be submitted and agreed with the local authority. The development shall be carried out in accordance with the agreed details [prior to the first occupation] and shall be retained and managed and maintained as such thereafter.

It should be noted that it is the applicants/developers/owners responsibility to ensure adequate drainage of the site so as not to adversely affect surrounding land, property or highway.

The reason for the condition is :-

To minimise the possibilities of flooding in accordance with Policy CS13 of GYBC Local Plan Part 1.

6. Prior to the first occupation of the development hereby permitted the Ecology Mitigation Measures set out in section 6.3 of the Ecological Appraisal prepared by Baker Consultants, ref 1593.02 dated March 2023 shall be implemented in full or in accordance with the approved timetable and retained as such thereafter.

The reason for the condition is :-

In order to mitigate the ecological impacts of the development in accordance with Policy CS11 of the GYBC Local Plan Part 1.

7. No part of the development hereby permitted shall be occupied prior to the implementation of those parts identified in the Framework Travel Plan as capable of being implemented prior to occupation. Those parts of the Framework Travel Plan and the remaining parts shall be implemented in accordance with the timetable contained therein and shall continue to be implemented as long as any part of the development is occupied.

The reason for the condition is :-

To ensure that the development supports sustainable modes of transport and to reduce the impact of travel and transport on the environment in accordance with Policies CS1 and CS2 of the GYBC Local Plan Part 1.

8. The Woodland Management and Maintenance Proposals and Proposed Landscaping Layout shall be carried out and subsequently retained, managed and maintained in accordance with the details contained in the Woodland Management Plan prepared by Andrew Davis Partnership, ref W2601 version 3 dated March 2023 including Drawing no. CP01 Rev C Woodland Management Plan; and Drawing No. MP01 Rev C Proposed Landscape Layout Plan following the commencement of development.

The reason for the condition is :-

In the interests of the satisfactory appearance of the development, the visual amenity of the area and to manage, maintain and enhance the ecological value of the site in accordance with Policy CS11 of the GYBC Local Plan Part 1 and Policies E4 and L2 of the GYBC Local Plan Part 2.

9. Any plants which die, are diseased, are removed or otherwise fail within the first FIVE years following planting in accordance with Drawing No. MP01 Rev C Proposed Landscape Layout Plan shall be replaced with the same species and size of plant unless otherwise agreed in writing with the Local Planning Authority

The reason for the condition is :-

In the interests of the satisfactory appearance of the development, the visual amenity of the area and to manage, maintain and enhance the ecological value of the site in accordance with Policy CS11 of the GYBC Local Plan Part 1 and Policies E4 and L2 of the GYBC Local Plan Part 2.

10. Foul drainage shall not be discharged other than to the foul sewer.

The reason for the condition is:-

In order to effect satisfactory drainage arrangements both on and from the site and to avoid problems of pollution of the water environment in accordance with Policy I3 of GYBC Local Plan Part 2.

11. The caravans shall be used for holiday accommodation only and shall not be used as a sole or main residence for any individual or family.

The reason for the condition is :-

To ensure the units are not used as permanent residential accommodation in accordance with Policies L1 and L2 of the GYBC Local Plan Part 2.

12. The owners/operators shall maintain an up-to-date register of the names of all owners/occupiers of individual caravans on the site, and of their main home addresses, and shall make this information available at all reasonable times to the local planning authority.

The reason for these conditions is:-

To ensure that approved holiday accommodation is not used for unauthorised permanent residential occupation. The register required shall normally be collected by the caravan site licence holder or his/her nominated person.

 No external lighting shall be installed other than in accordance with the Lighting Strategy Proposal Specification dated December 2022 including Drawing No. N/A -2700K LPS Stirrup

The reason for the condition is: -

In the interests of the amenities of the area and to avoid light pollution in accordance with Policies L2 and E6 of the GYBC Local Plan Part 2.

14. In the event that contamination that was not previously identified is found at any time when carrying out the approved development, it must be reported in writing immediately to the Local Planning Authority. All development shall cease and shall not recommence until:

1) a report has been submitted and agreed in writing by the Local Planning Authority which includes results of an investigation and risk assessment together with proposed remediation scheme to deal with the risk identified and

2) the agreed remediation scheme has been carried out and a validation report demonstrating its effectiveness has been approved in writing by the Local Planning Authority. The reason for the condition is :-

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptor as required by policy E6 of the Local Plan Part 2.

15. Before the installation of below ground services, details in written and drawn form of the means by which electric vehicle charging shall be made available at each caravan base within the development shall be submitted to and approved by the local planning authority. The works shall accord to the approved scheme and be available prior to first occupation of each base and shall be retained thereafter.

The reason for the condition is: -

To allow provision for the demand for electric vehicle charging within the lifetime of the development in accordance with Policy I1 of the GYBC Local Plan Part 2.

# Informative Notes:

16. STATEMENT OF POSITIVE ENGAGEMENT: In dealing with this application Great Yarmouth Borough Council has actively sought to work with the applicant in a positive and proactive manner.

It is confirmed that this 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.

In this instance the Borough Council has considered there is no likely significant effect on protected habitats arising solely from the development itself; and the development would contribute to the overall in-combination significant adverse effect identified by the Habitats Regulations Assessment Report for the Local Plan Core Strategy, but this effect can be adequately mitigated by the Habitats Monitoring and Mitigation Strategy; and that Strategy requires a payment of £210.84 per each additional caravan base towards the monitoring and mitigation provided through that Strategy.

17. NOTES - Please read the following notes carefully:-

Contamination Disclaimer:

NOTE: The responsibility for the safe development and secure occupancy of the site rests with the developer. The local planning authority has determined the application on the basis of the information available to it, but this does not mean that the land is

free from contamination, or that the land could not be declared Contaminated Land in future.

Construction noise notification:

The applicant is strongly recommended to advise neighbouring businesses and residential occupiers of the proposals, including any periods of potentially significant disturbance e.g. demolition or piling, together with contact details in the event of problems.

Hours of Work:

Due to the close proximity of other residential dwellings and businesses, the hours of any construction or refurbishment works should be restricted to reduce the likelihood of noise disturbance to:

0730 hours to 1830 hours Monday to Friday 0830 hours to 1330 hours Saturdays No work on Sundays or Bank Holidays.

Fire fighting water supplies:

The existing fire fighting water supplies provided to the site should be assessed and additional fire hydrants installed where necessary.

### Appendices:

1. Site Location Plan

