

Parish:	East Walton	
Proposal:	Retrospective camping/glamping site (application 2)	
Location:	Narford Lane East Walton Norfolk	
Applicant:	Westacre Estate Management	
Case No:	17/01272/FM (Full Application - Major Development)	
Case Officer:	Mrs N Osler	Date for Determination: 2 October 2017 Extension of Time Expiry Date: 10 November 2017

Reason for Referral to Planning Committee – Officer recommendation is contrary to Local Highway Authority recommendation.

Neighbourhood Plan: No

Case Summary

Retrospective planning permission is sought for a glamping / camping site at Bradmoor Woods, Narford Lane, East Walton.

The site lies in a heavily wooded area of countryside and is accessed from Narford Lane which is a narrow, winding country lane.

The site lies with the buffer zone of a SSSI and a ground water risk area (medium).

An EIA Screening Opinion was carried out on the previously withdrawn application. This occurred within the last two years and therefore a further one is not required. The Screening Opinion concluded that an Environmental Impact Assessment was not required.

Key Issues

Principle of Development
 Highway Safety
 Ecology
 Trees
 Other Material Considerations

Recommendation

APPROVE

THE APPLICATION

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The site lies within the buffer zone of a SSSI and a ground water risk area (medium).

The glamping facilities consist of a number of converted structures comprising: five 'bird houses', a railway carriage, two grain silos, an upturned boat, a broad's cruiser and a cattle truck. Communal structures comprise: bar, kitchen and seating area and a toilet and shower block.

Permission is sought to accommodate 35 glampers / campers at any one time during the period of 1 April to 30 September in any one year. In total the glamping structures can accommodate a maximum of 26 people (24 adult beds and 2 child beds); the other nine are accommodated in tents.

The site does not promote the use of caravans and these are prohibited on site.

There are 25 car parking places and an additional overflow car parking area which has only been required in the past when festivals were held on the site. The applicant has a temporary events licence to hold three festivals during the year: in May (Wild Tree Fair), July (Folk in the Field) and August (Harlequin Fayre). During the course of the application it has become apparent that planning permission is required for these festivals. This does not however form part of the current application (which is simply to accommodate 35 glampers / campers). The applicant has confirmed that if they propose to hold future festivals they will seek the appropriate planning permission.

There is no vehicular access within the site (i.e. beyond the car park) with only unmade pedestrian routes linking the structures.

There is no mains electricity on the site; with solar systems and batteries generating power.

SUPPORTING CASE

The following supporting statement was submitted by the agent on behalf of the applicant: *"Glamping derives its name from Glamorous Camping, a form of camping involving accommodation and facilities more luxurious than those associated with traditional camping."*

"Glamping is all about the 'experience'. It's about immersing yourself in your surroundings, taking great gulps of air, feeling the earth under your feet and dissolving away your daily stress. It's about getting back to nature without getting back to basics. You won't be living out of a rucksack and sleeping on the floor. No, Glamping is most definitely luxury camping."

Glamping is a fast growing alternative or addition to more traditional forms of holiday accommodation and as such it adds to the diversity of the tourist offer here in Norfolk, where the open spaces and isolated locations are ideally suited to the 'back to nature' approach of the philosophy."

This application seeks retrospective approval for a tourist facility that has developed organically and has proved very popular. The first application was made in 2016 but the

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preparation of various consultant reports means the application only now comes before the committee.

The site at Narford Lane comprises over 4 hectares of isolated woodland and the proposal incorporates a range of diverse and unusual structures providing the accommodation including a communal kitchen and wc/shower complex. Since its inception some 2 years ago with largely temporary structures the site has regularly attracted 20 – 30 visitors over 25 weekends per annum, and each of these bring general tourist benefits of increased economic activity and support for the various tourist industries of our county.

Whilst it is acknowledged that Highways have some reservations about the isolated nature of the proposal, it is precisely this isolation which people are seeking out. The proposal would simply not work next to a busy road or in a town centre. As a consequence the applicant has employed professional traffic consultants to examine the proposal and consider matters such as highway safety and congestion, and these consultants have concluded that the proposals have **minimal levels of traffic with no material impacts on the local road network**.

It is our view that the application, if approved, will add to the variety and diversity of tourist accommodation in West Norfolk, with all of the economic benefits that an improved tourist offer will bring”.

PLANNING HISTORY

16/00764/FM - Retrospective camping/glamping site - Withdrawn to enable resubmission with further information to address previous concerns from Natural England and the Local Highway Authority

RESPONSE TO CONSULTATION

Parish Council: None received at time of writing report. It is worth noting that the PC had ‘no observations’ in relation to the 2016 application for the same.

Highways Authority: OBJECT for the following reason:

The unclassified road serving the site is considered to be inadequate to serve the development proposed, by reason of its poor alignment, restricted width, lack of passing provision and substandard construction. The proposal, if permitted, would be likely to give rise to conditions detrimental to highway safety which would be contrary to the NPPF and Development Plan Policy CS11.

Arboricultural Officer: NO OBJECTION

Environmental Health & Housing – Environmental Quality: No comments to make in relation to air quality or contaminated land

Environmental Health & Housing – CSNN: **NO OBJECTION** recommend conditions to prevent permanent occupation

Environment Agency: No comments to make in relation to groundwater protection although it should be noted that an Environmental Permit may be required from the EA. This would be secured outside of the planning process.

Natural England: **NO OBJECTION** subject to conditions to secure mitigation

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Emergency Planning Officer: Recommends conditions relation to flood evacuation as part of the site lies in an area at risk of flooding

REPRESENTATIONS None received at time of writing report.

LDF CORE STRATEGY POLICIES

CS01 - Spatial Strategy

CS06 - Development in Rural Areas

CS08 - Sustainable Development

CS10 - The Economy

CS11 – Transport

CS12 - Environmental Assets

SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES PLAN 2016

DM1 – Presumption in Favour of Sustainable Development#

DM2 – Development Boundaries

DM11 – Touring and Permanent Holiday Sites

DM15 – Environment, Design and Amenity

DM17 - Parking Provision in New Development

NATIONAL GUIDANCE

National Planning Policy Framework (NPPF)
Planning Practice Guidance (PPG)

National Planning Policy Framework – sets out the Government’s planning policies for England and how these are expected to be applied.

National Planning Practice Guidance - Provides National Planning Practice Guidance, in support of and in addition to the NPPF

PLANNING CONSIDERATIONS

The main considerations in the determination of this application are:

- Principle of Development
- Highway Safety
- Ecology
- Trees

- Other Material Considerations

Principle of Development

The proposal represents a tourism use.

Paragraph 28 of the NPPF states: 'Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:... support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres; ...'

SADMP Policy DM11 relates specifically to Touring and Permanent Holiday Sites. The preamble to the policy reads:

12.1 Holiday sites offer a variety of tourist accommodation ranging from permanent static caravans, log cabins, park homes, yurts or chalets to pitches and associated facilities for touring tents, camper-vans, and caravans. Existing sites play an important role in the local economy and help the viability of local tourist attractions.

12.2 Permanent holiday sites can have a significant impact on the landscape and are vulnerable to the effects of flooding. Whilst these types of development occur across the Borough, they are most prevalent within the coastal settlements of Hunstanton, Heacham and Snettisham, which are largely within the Coastal Hazard Zone (see policy DM 18). Touring caravan and camping sites have a lower impact on the landscape as they are not permanently occupied and there may be little evidence of activity in winter months. However, in summer months they can be intrusive in the landscape and may add to visitor pressure on particular areas if not controlled.

12.3 The Core Strategy seeks to protect the countryside for its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife. It is therefore important to ensure that there is a correct balance between encouraging tourism and other policy aims of controlling development in the countryside. A controlled approach to new development is particularly desirable within the northern coastal area of the Borough, part of which is designated as the Norfolk Coast Area of Outstanding Natural Beauty (AONB) and within Sites of Special Scientific Interest (SSSIs). There is already a high quantity of varied tourist accommodation available, and it is preferable to protect this source of accommodation rather than construct new holiday sites in the countryside, particularly within the AONB.'

Policy DM11 reads:

Location requirements

Proposals for new holiday accommodation sites or units or extension or intensification to existing holiday accommodation will not normally be permitted unless:

- The proposal is supported by a business plan demonstrating how the site will be managed and how it will support tourism or tourist related uses in the area;

- The proposal demonstrates a high standard of design in terms of layout, screening and landscaping ensuring minimal adverse impact on visual amenity and the historical and natural environmental qualities of the surrounding landscape and surroundings; and
- The site can be safely accessed;
- It is in accordance with national policies on flood risk;
- The site is not within the Coastal Hazard Zone indicated on the Policies Map, or within areas identified as tidal defence breach Hazard Zone in the Borough Council's Strategic Flood Risk Assessment and the Environment Agency's mapping;

Small scale proposals for holiday accommodation will not normally be permitted within the Norfolk Coast Area of Outstanding Natural Beauty (AONB) unless it can be demonstrated that the proposal will not negatively impact on the landscape setting and scenic beauty of the AONB or on the landscape setting of the AONB if outside the designated area. Proposals for uses adversely affecting Sites of Special Scientific Interest (SSSIs) or European Sites will be refused permission.

Conditions to be applied to new holiday accommodation

Where development is permitted in the open countryside for new holiday accommodation, it is essential that such uses are genuine and will be operated and maintained as tourist facilities in the future. To achieve this aim, occupancy conditions will be placed on future planning permissions requiring that:

- The accommodation is occupied for holiday purposes only and shall be made available for rent or as commercial holiday lets;
- The accommodation shall be for short stay accommodation only (no more than 28 days per single let) and shall not be occupied as a person's sole or main place of residence; and
- The owners / operators shall maintain an up-to-date register of lettings / occupation and shall make this available at all reasonable times to the Local Planning Authority.

(NOTE – For the purposes of this policy the term 'holiday accommodation' is used to describe caravan based accommodation, including touring and permanent sites/units, as well as permanent buildings constructed for the purpose of letting etc.)'

The only issue contrary to the above is that the Local Highway Authority considers that Narford Lane is not suitable to accommodate the traffic associated with the use and that this could lead to highway safety issues. This issue is covered below.

In all other regards the proposal is considered to be in general accordance with the enabling policy and can be suitably controlled by condition if permission is granted.

Highway Safety

The Local Highway Authority considers that "Narford Lane is not suitable to accommodate the additional traffic that this application would engender. Narford Lane is of single track width with no formal passing provisions along its entire length. Whilst some limited informal areas of verge overrun are apparent these are not inter-visible, are rutted and muddled. There is a tight section of S bends to the southeast of the site with restricted forward visibility

where it rounds the buildings of Narford Hall. Due to the meandering alignment of Narford Lane the ability to anticipate oncoming vehicles is restricted.

In addition, Narford Lane has raised or sloping verges for the majority of its length, it has a narrow weak bridge, no formal positive drainage system and it is regularly mudded by surface water runoff and vehicle over run. In light of the above, it is therefore considered to be completely inadequate to cater for the proposed development. The application suggests that it will be for no more than 35 people in total with 25 car parking spaces for the glamping element. I am however mindful of the aspirations for the site at 46,064 Sq.m which have previously been indicted through its unauthorised use and a previous application submission. There is the additional camping element to be considered. Ultimately this site will generate significant additional traffic movements for the characteristics of the road.

With reference to the applicants transport statement:

While the inference of the transport statement is that the site is scaled down from the previous application submitted, the traffic levels are still considered to be significant given the Narford Lane road conditions. We are also of the view that the traffic levels have been underplayed given the lack of facilities that are found on the site and the draw of the surrounding area to the site patrons.

There is a mention of passing bays in their transport statement but the areas assumed to be considered are informal unsurfaced areas of wider grass verge which are not inter visible.

The report indicates that existing traffic flows on Narford Lane are low and no accidents have been recorded. This would be expected given the locality and nature of the road as it does not connect service centres and is not desirable to drive along. The lack of exiting recorded accidents is not a reason to approve an application which would completely alter the traffic patterns of the road.

The mentioned bus service at over 2 Km from the site is beyond the recognised accepted walking time distance, and the walking route along the highway is unrealistic and hazardous due to the lack of pedestrian safe refuge, speed of traffic and road alignment that would need to be crossed. I am of the view that it is misleading to suggest that this is a credible option for the patrons of the site to use.

I note that the use of caravans has not been applied for but tents are proposed. I note from the history of the booking records, which if to be taken on face value, show levels of site occupancy of 50, 60, 80, and 100 people. These are significant numbers which would require transport and there is no restriction and guarantee that the numbers would increase given the site area and class use applied for.

There is mention of festivals and the report suggests that there have fortunately not been any accidents associated with historic events. It does not however mention the adverse impact to the highway that would occur. Events do not require planning permission and are generally traffic managed, they are for short periods of time only and do not generate habitual traffic as per the application being considered.

There can be no guarantee which route patrons would take to and from the site and signing would require planning permission on private land. The Highway Authority does not support the installation of private direction signs on the highway. Regardless signing a route does not guarantee that such would be taken and Narford Lane remains of single width and unsuitable in our view to the west.

The transport statement would appear to place a number of assumptions which suggest that traffic generation would be very low. However there can be no guarantee that this site would behave in a different manner to any other approved camping facility, its class use would be for a permanent site that could operate in a different way and it cannot be guaranteed when and where traffic would leave and return. It must be considered that an approval of the application will result in additional trips on this inappropriate section of highway.

Design Bulletin 32 has been superseded for some years, and the National Planning Policy Framework (NPPF) states that development should only be refused on transport grounds where the residual cumulative impacts of the development are severe, it also states that decisions should take account of whether safe and suitable access to the site can be achieved for all people, which given the road conditions that are found on Narford Lane, in this case it would not be.

Ultimately, I believe that an approval of the application would result in conditions detrimental to highway safety and I recommend that the application be refused for the following reason:

The unclassified road serving the site is considered to be inadequate to serve the development proposed, by reason of its poor alignment, restricted width, lack of passing provision and substandard construction. The proposal, if permitted, would be likely to give rise to conditions detrimental to highway safety which would be contrary to the NPPF and Development Plan Policy CS11."

It is clear from the above that the main issue is the condition of Narford Lane. After due consideration your officers consider that the greatest degree of inconvenience will be to users of the site (Narford Lane is not a heavily trafficked route). It is likely that people coming to the site, not knowing the area, and confronted with a narrow twisting road, are likely to travel at moderate speed. As such your officers believe the issue is more of inconvenience than safety. However members need to give careful consideration to making a decision contrary to the Local Highway Authority.

Ecology

An Ecological Survey and Protected Species Assessment accompanied the application. The findings of the assessments are that the habitats on the site are of moderate ecological value and that these will not be disturbed or removed during operation of the site. Mitigation measures are required for bats and birds, and biodiversity enhancements are recommended for bats, birds, amphibians and reptiles.

Natural England has no objection to the proposed development in terms of its impact on the River Nar SSSI subject to conditions relating to foul water drainage, provision of information boards and / or leaflets within the site to highlight the sensitive nature of the river and to direct recreational activities to the appropriate areas, and for biodiversity enhancements including the installation of bat and bird boxes.

NWT was not consulted on this application although it should be noted that in response to consultation on the previously withdrawn application they raised no objection. Furthermore the ecologist made contact with both Natural England and Norfolk Wildlife Trust during the production of the assessments and their comments were reflected and addressed in the submitted surveys.

Drainage

The site overlays a ground water protection area and therefore it is imperative that pollution of these waters does not occur. In this regard Natural England has sought to ensure that the

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existing septic tank has sufficient capacity to prevent any discharges having a negative impact on the river quality.

The drainage strategy that accompanied the application suggests that there is capacity in the current system although they acknowledge that the existing drainage field will need increasing. This can be suitably conditioned if permission is granted.

The Environment Agency raises no objection on the grounds of pollution control and state that an Environmental Permit may be required under their own legislation. If this is the case it would be dealt with outside of the planning system.

Trees

The proposal uses existing unmade footways and the structures are on basic non-permanent foundations (e.g. logs or small slabs). No vehicles pass through the site which only has pedestrian movement.

An Arboricultural Implications Assessment accompanied the application and paid particular attention to the condition of the trees within the areas where the existing structures have been installed.

The assessment found that none of the trees surrounding the structures appear to have suffered as a result of the installation works and therefore no remedial works to any of the trees is necessary.

The assessment recommends that the camping and glamping area is not expanded any further into the wooded area and that the parking and camp fire sites (the latter of which is in a large un-treed area) should be restricted to their current position.

The Local Authority's Arboricultural Officer has no objection to the development.

Other Material Considerations

Flood Risk

The Emergency Planning Officer has recommended conditions due to part of the sites location in an area at risk of flooding. However, the site is not in an area at risk of flooding and therefore these conditions are neither reasonable nor necessary.

Crime and Disorder

There are no specific crime and disorder issues relating to the proposed development.

CONCLUSION

The development is a tourism use that is in general accordance with policy and guidance. No objections have been received from statutory consultees or third parties other than the Local Highway Authority.

Issues such as numbers (35), seasonal use (1 April – 30 September in any one year), increase in drainage field, ecological mitigation and enhancement, and the provision of information boards / leaflets can all be suitably conditioned.

Members therefore need to consider whether the Local Highway Authority's objection on the grounds of the standard of Narford Road and the knock-on highway safety concerns are sufficient to warrant refusal of the application. For the reasons outlined above, your officers

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consider that, on balance, whilst there may be some inconvenience caused to users of the site because of the standard of Narford Road this is not sufficient enough to warrant refusal.

It is therefore recommended that seasonal consent is granted subject to the following additional conditions.

RECOMMENDATION:

APPROVE subject to the imposition of the following condition(s):

- 1 Condition: The structures, car park and camp fire area shall all be retained in the positions shown on drawing no: 3289.02 Rev.B.
- 1 Reason: For the avoidance of doubt and in the interests of proper planning.
- 2 Condition: The development hereby permitted shall only be operated between 1 April and 30 September (inclusive) in any calendar year.
- 2 Reason: To define the terms of the permission, prevent permanent occupation and to enable the Local Planning Authority to retain control over the development where a permanent permission may give rise to conditions detrimental to the amenities of the locality in accordance with the NPPF and Development Plan.
- 3 Condition: The development hereby permitted shall be used as short stay holiday accommodation only (no more than 28 days per single let) and the owners / operators shall maintain an up-to-date register of lettings / occupation and shall make this available at all reasonable times to the Local Planning Authority.
- 3 Reason: The site lies within in an area in which the Local Planning Authority would not normally permit permanent residential development. This permission is granted because accommodation is to be used for holiday purposes only in accordance with the NPPF.
- 4 Condition:No more than 35 campers / glampers shall be accommodated on site at any one time.
- 4 Reason: To define the terms of the permission and to ensure that the site can be suitably drained in accordance with the NPPF and Development Plan.
- 5 Condition: Within 3 months of the date of this permission details of information boards within the site and / or leaflets to highlight the sensitive nature of the River Nar and to direct recreational activities to appropriate areas i.e. The Nar Valley Way shall be submitted to and agreed in writing by the Local Planning Authority. If information boards are proposed the details shall include a plan showing their location within the site.
- 5 Reason: To ensure that the impact of the development upon The River Nar SSSI is minimised in accordance with the NPPF and NPPG.
- 6 Condition: The information boards / leaflets approved under Condition 5 of this permission shall be erected / available at the site prior to the next available camping season (1 April – 30 September) and thereafter be retained / available.

- 6 Reason: To ensure that the impact of the development upon The River Nar SSSI is minimised in accordance with the NPPF and NPPG.
- 7 Condition: The drainage field shall be increased in accordance with the amended Foul Drainage Field Assessment that accompanied the application (dated October 2017, Rev B by Plandescil Consulting Engineers) prior to the next available camping season (1 April – 30 September) and shall thereafter be retained.
- 7 Reason: To ensure there is a satisfactory means of drainage in accordance with the NPPF.
- 8 Condition: Within 3 months of the date of this decision the proposed enhancements outlined in Chapter 8 of the Preliminary Ecological Appraisal that accompanied the application (dated 12 September 2016 undertaken by greenlight environmental consultancy) shall be implemented and thereafter retained unless otherwise agreed in writing by the Local Planning Authority.
- 8 Reason: To ensure that the impact of the development upon protected species is minimised in accordance with the NPPF and NPPG.