

Draft Policy LP08 – Touring and Permanent Holiday Sites

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542883291268#section-s1542883291268>

Consideration of issues:

A number of minor rewordings are suggested by consultees. These are:

- to reflect the importance of the historic environment;
- to recognise the extent of the tidal hazard area;
- and to reflect the significance of the AONB. These can be incorporated.

The policy point made by Heritage Developments (who also promote a site proposal in Thornham) about how the Policy, in their view “fails to apply this enhancement test to major development proposals regardless of site size, built context, the extent to which mitigation and community and landscape enhancements can be delivered” needs discussion with the Norfolk Coast Partnership.

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

- 1) Amend policy clause 1b by replacing 'minimal adverse impact on....historical and natural environment qualities' with 'conserve and enhance the historic and natural environment'.**
- 2) Amend policy clause 1e by including 'or within the Tidal Hazard Mapping extent'.**
- 3) Amend policy clause 2 by adding 'other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest'.**
- 4) Amend policy clause 3 by adding 'Project level HRA will be required for such proposals.'**

Policy Recommendation:

LP08 Touring and Permanent Holiday Site Policy (previously DM11)

Introduction

Policy LP08 Touring and Permanent Holiday Sites (previously DM11)

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.).

Location requirements

1. Proposals for new holiday accommodation sites or units or extension or intensification to existing holiday accommodation will not normally be permitted unless:
 - a. 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;
 - b. the proposal demonstrates a high standard of design in terms of layout, screening and landscaping ensuring minimal adverse impact on visual amenity and **conserves and enhances** the historical and natural environmental **qualities of the surrounding landscape and surroundings**; and
 - c. the site can be safely accessed;
 - d. it is in accordance with national policies on flood risk;
 - e. the site is not within the coastal change management area indicated on the Policies Map, or within areas identified as flood zone 3 **or within the Tidal Hazard Mapping extent** in the Borough Council’s Strategic Flood Risk Assessment.
2. Major development proposals for holiday accommodation in the Norfolk Coast Area of Outstanding Natural Beauty (AONB) will be refused **other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest**. Minor development proposals

for holiday accommodation will only be permitted within the AONB where 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.

3. Proposals for uses adversely affecting Sites of Special Scientific Interest (SSSIs) or European Sites will be refused permission. **Project level HRA will be required for such proposals.**

Conditions to be applied to new holiday accommodation

3. 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:
 - a. the accommodation is occupied for holiday purposes only and shall be made available for rent or as commercial holiday lets;
 - b. 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
 - c. 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.

Supporting text:

Introduction

5.3.1 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.

5.3.2 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 Change Management Area (see policy LP15). 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.

5.3.3 The strategic policies seek 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.

Relevant Local and National Policies and Guidance

National Planning Policy Framework: Supporting a prosperous rural economy

National Planning Policy Framework: Meeting the challenge of climate change, flooding and coastal change

National Planning Practice Guidance

The Marine Policy Statement/East Marine Plans Policies:

- EC1-2 economy
- TR3 tourism and recreation areas
- CC1 climate change.

The Wash Shoreline Management Plan (SMP) (Nov 2010) and North Norfolk SMP (July 2011)

Strategic Policies:

- LP06 The Economy
- LP14 Coastal Areas

- LP16 Flood Risk
- LP37 Development in Rural Areas

Policy Approach

5.3.4 In order that touring and permanent holiday sites do not have a significant adverse impact on the landscape, it is proposed that new sites and extensions to and intensification of existing sites will not normally be permitted within the Norfolk Coast AONB, SSSIs and the coastal change management area.

5.3.5 Policy LP15 Coastal Change Management Area defines how proposals for touring and permanent holiday sites within the coastal change management area (as defined on the policies map) will be assessed.

Sustainability Appraisal:

LP08 Touring and Permanent Holiday Sites

The proposed policy remains very similar to the draft version with minor textual changes in response to the comments made; consequently the scores are the same. Not having a policy on this matter would clearly not be an option and this is reflected in the scoring.

LP08: Touring and Permanent Holiday Sites																							
Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
LP08	+/-	0	0	++	0	++	++	++	0	0	++	++	0	0	+	0	0	0	0	++	+16	-1	Likely Positive Effect +15
Draft LP08	+/-	0	0	++	0	++	++	++	0	0	++	++	0	0	+	0	0	0	0	++	+16	-1	Likely Positive Effect +15
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect 0

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Planning Advisor Environment Agency	Object	Under Location Requirements, point e), the Plan states: ‘the site is not within the coastal change management area indicated on the Policies Map, or within areas identified as flood zone 3 in the Borough Council’s Strategic Flood Risk Assessment’. Although small, there may be areas shown to be within the Tidal Hazard Mapping (THM) extent that fall outside of Flood Zone 3.	3. Sentence could be reworded to include reference to THM extent.	Agree - reword sentence to include reference to the Tidal Hazard Mapping extent.
Historic Environment Planning Adviser, East of England Historic England	Object	Object - Replace ‘minimal adverse impact on....historical and natural environment qualities’ with ‘conserve and enhance the historic and natural environment’. This is consistent with the NPPF and is a higher test than that required in the current policy wording.	Replace ‘minimal adverse impact on....historical and natural environment qualities’ with ‘conserve and enhance the historic and natural environment’.	Agree – replace 'minimal adverse impact on....historical and natural environment qualities' with ‘conserve and enhance the historic and natural environment’ in Policy LP08 b.
Norfolk Coast Partnership (AONB)	Support	We support Policy LP08 – Touring and Permanent Holiday Sites		Support noted.
Parish Clerk Holme- Next-The-Sea Parish Council	Object	The supporting text proposes that new sites and extensions to and intensification of existing sites will not normally be permitted within the Norfolk Coast AONB, SSSIs (paragraph 5.3.4) but this is not clearly reflected in the policy wording “Major development proposals for holiday accommodation in the Norfolk Coast Area of Outstanding Natural Beauty (AONB) will be refused. Minor development proposals for holiday accommodation will (only be) permitted within the AONB where it can be demonstrated....” The approach with respect to flood risk requires clarification for coastal areas beyond the Coastal Change Management Area – i.e.	The policy wording should be changed to be consistent with the supporting text and the upgraded protection given to AONBs in the 2019 NPPF update.	Agree - change policy wording to be consistent with the supporting text/NPPF2019 by amending policy clause 2 by adding ‘other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest’.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>Holme has SMP Managed Realignment status but there are no policy controls in relation to this.</p> <p>Given the decision-taker's responsibility (NPPF), definitions of Major and Minor development as relevant to AONB are required.</p> <p>The policy does not recognise the impact of visitor pressure in the AONB. This is particularly relevant given that the occupancies of holiday accommodation are generally much higher than those of private residences.</p>		
Consultations Team Natural England	Mixed	Natural England are supportive of policy LP08 which affords protection to the character and beauty of the countryside, diversity of landscape and wildlife. We agree with the prevention of major tourist development within the Norfolk Coast Area of Outstanding Natural Beauty (AONB).	We recommend that tourism development is subject to a project level HRA including accommodation and business where there is a potential risk to the interest features of designated sites, including SSSI's.	Agree - include a requirement for project level HRA in line with the comment.
Heritage Developments Ltd	Object	My client also objects to the wording of Policy LP08 as currently drafted. The emerging Policy imposes a blanket restriction on larger holiday accommodation proposals in the AONB regardless of local need; context; the actual landscape sensitivity of the site; and individual or wider landscape, cultural and employment merits of any proposal. Villages such as Thornham that are located wholly within the AONB exist. The village is an existing holiday, food and tourist destination. Without dedicated accommodation such as that proposed it is certain that further harm will be caused to the		Consider the general policy point in consultation with the Norfolk Coast Partnership. Any specific allocations in Thornham will be for the Neighbourhood Plan to consider.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>vitality and culture of the village through the loss of existing housing to holiday accommodation. My client’s proposals seek to redress this cultural and social decline and to free-up existing housing stock to bring the village of Thornham back to life. In this way the proposals meet the aims and objectives of the National Planning Policy Framework as well as providing a valuable employment source within this part of the rural area.</p> <p>My client is aware that the NPPF affords great weight to AONBs however paragraph 172 of the same document states that “...great weight should be given to conserving and enhancing landscape and scenic beauty...” in AONBs.</p> <p>My client contends that emerging Policy LP08 fails to apply this enhancement test to major development proposals regardless of site size, built context, the extent to which mitigation and community and landscape enhancements can be delivered.</p> <p>Therefore, my client respectfully requests that the emerging Policy is amended to better reflect the aims and objectives of the NPPF and to allow my clients scheme to come forward. I trust that my client’s representations are well-received, that the attached document fully explains the opportunity that exists in this instance, and the Council sees the merits in amending the emerging Thornham Inset Map and Policy LP08 as requested.</p>		