

AGENDA ITEM NO: 8/2(d)

Parish:	Hunstanton Heacham	
Proposal:	Temporary use of land for the siting of caravans for holiday occupation on an extended season up to and including 31 December 2022	
Location:	Searles of Hunstanton South Beach Road Hunstanton Norfolk	
Applicant:	Searles (Camping Ground) Limited	
Case No:	20/02097/FM (Full Application - Major Development)	
Case Officer:	Mrs K Lawty	Date for Determination: 19 March 2021

Reason for Referral to Planning Committee — Parish Council objection and raises matters of wider concern

Neighbourhood Plan: No

Case Summary

The site comprises areas of holiday lodge caravans, traditional static caravans, touring caravan and tented accommodation, known as Searles Leisure Resort. It has a caravan site licence allowing for the siting of a total of 657 static holiday caravans and 241 touring caravans and tents. In addition to the accommodation, a wide range of supporting services and facilities are provided for guests

The site is bordered to the west by residential accommodation facing the coast, and by Manor Park Holiday Park to the east, while the first 9 holes of Searles Country Park golf course lie immediately south of the holiday park and the second 9 holes lie to the south east of the resort.

The planning history of the site is complex, with several different historic permissions across the whole area. Different parts of the site have different historic permissions in place, with some restrictions relating to the seasons of occupation of that certain parts of the site.

The site also has a caravan licence which states that the permitted season of occupation runs from 15th February to 15th January in the following year.

For many months the caravans have not been able to be used due to the restrictions imposed by the government relating to the coronavirus pandemic.

This proposal seeks the extension of the season for occupation for a temporary period of time to compensate for loss of use in the spring and summer months of 2020 in particular.

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This application therefore proposes the extension of the operation season to allow for the use of the caravans during those periods when planning conditions would otherwise prevent them from being occupied, for a temporary period until 31 December 2022, to recover earnings lost during the Covid-19 lockdown.

The key justification for the application, which is to be weighed in the balance, is Government guidance issued on 14 July 2020, in relation to this issue.

Key Issues

- * Planning history
- * Principle of development
- * Government advice
- * Flood risk
- * Precedent
- * Other material considerations

Recommendation

APPROVE

THE APPLICATION

The site comprises areas of holiday lodge caravans, traditional static caravans (privately owned and site owned), touring caravan and tented accommodation. It has a caravan site licence allowing for the siting of a total of 657 static holiday caravans and 241 touring caravans and tents. In addition to the accommodation, a wide range of supporting services and facilities are provided for guests.

The site is bordered to the west by residential accommodation facing the coast, and by Manor Park Holiday Park to the east, while the first 9 holes of Searles Country Park golf course lie immediately south of the holiday park and the second 9 holes lie to the south east of the resort.

No public rights of way cross any part of the proposal site, although a public footpath outside the leisure resort runs along to the west of the existing tented camping field and the proposed field shelter location.

The planning history of the site is complex, with many different historic permissions across the whole area. Different parts of the site have different historic permissions in place, with some restrictions relating to the seasons of occupation of that certain parts of the site.

The site also has a caravan licence which states that the permitted season of occupation runs from 15th February to 15th January in the following year.

For many months the caravans were not able to be used due to the restrictions imposed by the government relating to the coronavirus pandemic.

This proposal seeks the extension of the season for occupation for a temporary period of time to compensate for loss of use in 2020 and 2021.

This application therefore proposes the extension of the operation season to allow for the use of the caravans during those periods when planning conditions would otherwise prevent them from being occupied, for a temporary period until 31 December 2022, to recover earnings lost during the Covid-19 lockdown.

SUPPORTING CASE

This statement is written on behalf of Searles (Camping Ground) Limited, owner and operator of Searles Leisure Resort in Hunstanton since the early 1950s, and which is currently the subject of a planning application for temporary use of land for the siting of caravans for holiday occupation on an extended season up to and including 31 December 2022.

The only reason for submitting this application is to help the applicant's holiday park business to recover from the impact of the multiple periods of forced closure over the last 12 months during the Covid-19 pandemic. Government guidance, in the form of a written ministerial statement published on 14 July 2020, explicitly seeks to support the tourism sector during these difficult times by way of temporary extensions to the opening season of caravan/holiday parks to counter the economic and social impacts of the pandemic. The guidance encourages local planning authorities to "consider the benefits of longer opening season times for a temporary period to the local economy as it recovers from the impact of COVID-19".

Searles Leisure Resort, like other holiday park operators locally and nationally, needs to offer their accommodation for an extended season to make up for the loss of 3.5 months from March to July 2020, a month in November 2020, and 3 months from January to March 2021, to remain viable as a business and continue supporting 200+ jobs on site and additional jobs and spending locally.

The application does not propose to instate a 'winter season' as the leisure resort already has planning permission and a site licence allowing holiday use throughout much of the winter. As paragraph 4.2 of the submitted Planning Statement explains, the proposal is for just 32 additional days use between 15 January and 15 February 2022 in the majority of the site (Areas 1, 2, 3, 5 and 6 of submitted plan ref. AY/02C000854/02), and 151 additional days in 2021 and 2022 in a very small area (Area 4) comprising just 37 touring caravan pitches.

The application also will not result in any additional caravans being sited at the application site, and the permission, if granted, will cease to have any effect after 31 December 2022 in any case.

The important issue of flood risk has been considered in detail, both in terms of the site-specific flood risk and the effectiveness of the site's existing flood risk mitigation measures including robust and up to date flood evacuation plans in place to safely remove and relocate visitors off site in the event of a flood warning.

Neither the Environment Agency nor the Council's District Emergency Planning Officer have raised any objection. The application has been made to help make up for the loss of trade during several periods of enforced closure, and the extended holiday season applied for is both temporary and shorter than these three lockdown periods and therefore, overall, less people will have been at risk of flooding.

The proposed season extension can be considered sustainable development that will have economic and social benefits and will not adversely impact on the environment. The

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applicant, therefore, respectfully requests the Planning Committee to approve the temporary use of land for the siting of caravans for holiday occupation on an extended season up to and including 31 December 2022.

Thank you, in anticipation, for your support for local business at this challenging time.

PLANNING HISTORY

21/00386/F: Under consideration: - Construction of field shelter for year-round use, construction of tennis courts and paddle ball court and multi-sports pitch, installation of electric service network and continued use of land for camping, and change of use of land for siting static caravans - Field Shelter At Searles Caravan Park, South Beach Road, Hunstanton

20/01092/LDP: Would be Lawful: 11/11/20 - Lawful development certificate for the proposed use of land for the siting of holiday lodge caravans in place of the currently sited touring caravans - Searles Leisure Resort Hunstanton

17/00033/F: Application Permitted: 09/03/17 - Variation of condition 2 of planning permission 16/01360/F: To amend previously approved drawings for the construction of a new enclosed swimming pool and associated works - Searles of Hunstanton

16/01360/F: Application Permitted: 23/09/16 - Construction of a new enclosed swimming pool and its associated works - Searles of Hunstanton

2/03/1573/F: Application Permitted: 03/10/03 - Arcade canopy to existing open area - Searles of Hunstanton

2/98/0316/F: Application Permitted: 20/04/98 - Extensions to administration buildings including covered links and walkways - Searles Holiday Centre

2/98/0493/CU: Appeal Allowed 11/06/99 - Application Refused: 04/08/98 - Creation of 9-hole golf course driving range bowling green clubhouse 48 timber clad caravan holiday homes 47 touring caravan pitches and ancillary facilities - Land Adjoining To Searles Leisure Resort

2/98/1265/CU: Application Withdrawn: 19/11/99 - Creation of 9-hole golf course driving range bowling green clubhouse and recreational land - Land Adjoining To Searles Leisure Resort,
South Beach Road, Hunstanton

2/98/1631/F: Application Permitted: 05/01/99 - Extension to main club building - Searles of Hunstanton, South Beach Road Hunstanton

2/95/1494/F: Application Permitted: 19/12/95 - Extension to swimming pool/leisure centre - Searles Holiday Centre, Hunstanton

2/94/1289/F: Application Permitted: 19/09/94 - Extensions to provide ancillary accommodation and kiosk to existing bar and leisure facilities - Searles of Hunstanton

2/94/0709/F: Application Permitted: 14/06/94 - Retention of bottle store and glazed walkway - Searles of Hunstanton

2/94/1647/PN:: 10/11/94 - Installation of 6 telephone kiosks - Searles of Hunstanton

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South Beach Road

2/93/0545/F: Application Permitted: 08/06/93 - Extension to existing clubhouse for use as restaurant and construction of new workshop - South Beach Road, Hunstanton

RESPONSE TO CONSULTATION

Hunstanton Parish Council: SUPPORT- we as a Town Council feel that the plans submitted for this property falls in line with this Councils visions on the recovery of the town post pandemic.

Heacham Parish Council: OBJECT- Heacham Parish Council oppose this application, 20/02097FM, Searles Caravan Park Hunstanton, our reasons are as follows,

Firstly, the application is not clear as to whether they are increasing the amount of caravans on the site, which we would object to.

Our objections are based on extensive local knowledge, which we feel is very important in this situation. (They are not based on flood risk assessments or AW figures as these are due to be reassessed and are at variance with each other.)

We really do appreciate the economic reasons for this application but feel that environmental and human factors are far more important in this case.

Seasonal restrictions are due to newer flood risk assessments by the EA.

The seasonal restrictions have been in place for many years based on lower figures. The risk is now much greater, making less sense than ever for this change. If an extension to the season goes through at this time, then there will be fewer grounds for argument next year and in subsequent years. These greater risks may endanger lives.

Due to Global Warming water levels throughout the country are rising and unpredictable flooding is occurring, so we should be very cautious about the wisdom of dismissing the rules we have in place.

We have in recent years suffered from bouts of very heavy rainfall, the land has become saturated and the absorbency has lessened, and new ponds are forming.

We had several flood warnings and very high tides lately and much of the Norfolk coast has suffered from severe erosion of land into the sea.

The caravans on these sites are not built for occupation in the winter and have insufficient insulation for this use. If you have ever been in one on a cold summer's evening you will know they are barely warm then, let alone in a freezing winter. This in turn will lead to extensive use of heaters which may not be of the proper regulation for use in caravans and certainly not environmentally friendly.

The impact of a winter season on the local populace is great in many ways including the pressure on our Doctor's surgeries and the hospital.

They already must cope with more sickness within our aged community, with winter ailments like flu and now of course Covid-19. This will increase the pressure on them considerably as most of these caravan owners are not young people either.

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The logic of encouraging visitors, in a colder Covid season, from mingling with locals, especially toing and froing from place to place, is not sound.

The impact on wildlife - winter roosts need a rest too, particularly nesting birds on the coast, not least those birds who have migrated to their winter feeding grounds – these should not be underestimated.

One of our Borough Councillors got an MBE for his good work with the Covid Crisis, it would be a shame for him if our levels of infection went higher because of the wrong decision in his own Ward.

Highways Authority: NO OBJECTION - I am able to comment that in relation to highways issues only, as this proposal does not affect the current traffic patterns or the free flow of traffic that Norfolk County Council does not wish to resist the grant of consent.

Environment Agency: NO OBJECTION - As of the 14th July 2020, an extension to the open season can be acquired for caravan, campsite and holiday park owners. Please note that this is for a temporary period and will expire on the 31st December 2022 unless superseded by a further statement. This will therefore have no impact on the long-term aim of the Local Plan policy.

We have no objection to the proposed extension, but strongly recommend that the mitigation measures proposed in the submitted Flood Risk Assessment (FRA) are adhered to and provided the agreed evacuation plans are in place. The Tidal Hazard Mapping for this site states that in a 0.5% AEP breach that flood depths for this site would be greater than 2m.

Registration to receive flood warnings is not sufficient on its own to act as an evacuation plan. We are unable to comment on evacuation and rescue procedures for developments. Advice should be sought from the emergency services and the Local Authority's emergency planners when producing a flood evacuation plan.

District Emergency Planning Office: NO OBJECTION – This application is in line with the extension to extend holiday season MHCLG guidance as part of the recovery to the Covid 19 pandemic. The submitted flood evacuation plan and arrangements to receive flood warnings are fit for purpose from an emergency planning point of view.

Environmental Quality: NO OBJECTION - Having reviewed the information in the application and our files, we have no objections with regard to contaminated land.

Natural England: No objection - Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

REPRESENTATIONS

ONE letter of **SUPPORT** received referring to the following:-

After a torrid year of disruption this application seeks to follow Government encouragement for Covid recovery plans. Searles are probably the largest employer in Hunstanton with over 250 staff and their clients contribute greatly to Hunstanton's wider economic success helping sustain town centre businesses.

LDF CORE STRATEGY POLICIES

CS10 - The Economy

CS01 - Spatial Strategy

CS02 - The Settlement Hierarchy

CS06 - Development in Rural Areas

CS07 - Development in Coastal Areas

CS08 - Sustainable Development

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

DM18 – Coastal Flood Risk Hazard Zone (Hunstanton to Dersingham)

DM21 - Sites in Areas of Flood Risk

NEIGHBOURHOOD PLAN POLICIES

n/a – Heacham Neighbourhood Plan currently on consultation

NATIONAL GUIDANCE

National Planning Policy Framework (NPPF)

Planning Practice Guidance (PPG)

National Design Guide 2019

PLANNING CONSIDERATIONS

The main issues for consideration in this case are:-

- Planning history
- Principle of development
- Government advice
- Flood risk
- Precedent
- Nature conservation sites
- Other material considerations

Background/ Planning history

Searles leisure resort has grown incrementally since the early 1950s and as a result the site's planning history is long and complex. The area can be defined by 7 different areas, each with different planning approvals, approved at different times.

Some of the early records have details missing from the files, but to simplify the current position the applicant has summarised the existing approved uses as:

Area	Current season
1	Assumed closed from 15 Jan to 15 Feb each year
2	Assumed closed from 15 Jan to 15 Feb each year
3	Closed from 15 Jan to 15 Feb each year
4	Assumed open from earlier of 1 March or Maundy Thurs to 31 Oct
5	Assumed no restriction (12 month)
6	Closed from 15 Jan to 15 Feb each year
7	No restriction (12 month)

Consequently this application seeks the following in regard to each area:

Area	Proposed season
1	15 Jan to 15 Feb
2	15 Jan to 15 Feb
3	15 Jan to 15 Feb
4	1st Nov to 28th Feb
5	No requirement for an extension
6	15 Jan to 15 Feb
7	No requirement for extension

Principle of development

The use of the site for the stranding of static caravans and their use for holiday purposes is well established. The principle of the use for this purpose is therefore not at issue. The key issue is the temporary extended use of the site for holiday purposes during a month/months of the year which have historically been prevented due to the perils of flood risk and harm to life.

Government advice

On 14th July 2020, the government published a written ministerial statement to support the tourism sector and specifically the season extension of caravan, campsites and holiday parks encouraging local planning authorities (LPAs) to exercise their discretion in relation to planning conditions for such sites.

This statement sets out the approach LPAs should take to decision making for these venues that have been made temporarily vacant by Covid-19 business disruption. LPAs are encouraged not to undertake enforcement action which would unnecessarily restrict the ability of caravan, campsites and holiday parks to extend their open season. The statement came into effect on 14th July 2020 and will remain in place until 31st December 2022.

The relevant government guidance states that where the open season of a caravan park is limited by planning condition, park owners should speak to their local planning authority who can advise whether planning permission is necessary. It adds that where there may be particular concerns about flooding, as in the subject case, applicants are encouraged to seek advice from the Environment Agency before submitting the application.

On 22 February 2021 the government issued guidance in the 'COVID-19 Response - Spring 2021' and on 24 February 2021 their 'Reopening businesses and venues'. This sets out a 'roadmap' for recovery after Covid-19, identifying with different steps for recovery

In terms of caravan parks the following applies:-

Step 2 - no earlier than 12 April

Self-contained holiday accommodation in which all facilities (including for sleeping, catering, bathing, and indoor lobbies and corridors for entry and exit) are restricted to exclusive use of a single household/support bubble will reopen.

Step 3 - no earlier than 17 May

Remaining holiday accommodation can reopen.

Flood risk

This site is in a high risk flood area. It is Flood Zone 3 and is located behind an Environment Agency flood defence which provides a 1 in 50-year standard of protection. The flood defence consists of an earth and sand embankment.

The areas of Searles which are the subject of this application have no recorded history of flooding.

The SFRA identifies that the site is at risk during the 0.5% annual probability tidal event and during a breach of the coastal defences.

During the present day 0.5% annual probability (1 in 200 chance each year) event the estimated tide level of +5.31m OD together with the effect of wave action is likely to lead to overtopping of the coastal defence. Over time there will be a gradual increase in risk to the site due to climate change. During the design life of the development a maximum tide level of +6.51m OD has been estimated during the 0.5% annual probability (1 in 200 chance each year) event.

The site would be at risk in the event of a breach of the tidal defences. Within the site the risk varies between no risk and a flood depth greater than 2.0m.

The submitted site specific FRA concludes that 'The proposals do not increase the vulnerability of an occupant of the site. Any potential increase in risk associated with the site being occupied for a longer period during the winter are considered to be mitigated by the Flood Evacuation Plan for the site.'

In regard to risk the EA state that the Local Planning Authority 'must be satisfied with regard to the safety of people (including those with restricted mobility), the ability of such people to reach places of safety including safe refuges within buildings and the ability of the emergency services to access such buildings to rescue and evacuate those people.'

The EA do not normally comment on or approve the adequacy of flood emergency response and evacuation procedures accompanying development proposals, as they do not carry out these roles during a flood. Their involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users and professional partners including the Local Authority.

However, the Environment Agency have no objection to the proposed extension, but strongly recommend that the measures proposed in the submitted flood plans are adhered to. The

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EA consider the temporary nature of this extended use would have no impact on the long term aim of the Local Plan policy.

The Emergency Development Officer raises no objection, stating, this application is in line with the extension to extend holiday season MHCLG guidance as part of the recovery to the Covid 19 pandemic. The submitted flood evacuation plan and arrangements to receive flood warnings are fit for purpose from an emergency planning point of view.

This section of coastline is at very high risk with only a one in 50 year (2% annual probability) standard of protection. The required standard of protection from tidal flood risk, as stipulated in the NPPF, is one in 200 years (0.5% annual probability).

The preamble to Policy DM18 refers at para C.19.8. 'Considering the risks associated with the seasonality of each of the highest astronomical tides, the probability of storm surges, and wave action severity, reports undertaken for the Borough Council concluded the only safe period of occupancy was between 1st April and 30th September each year. Occupation outside these dates at this location could not be considered safe due to flood risk and would therefore be contrary to the National Planning Policy Framework/Practice Guidance.'

Policy DM18 states that seasonal occupancy limited to between 1 April and 30 September and applications to remove, relax or vary (by way of extension) any existing seasonal occupancy condition will be resisted.

Clearly the proposed extended use of the sites outside the agreed safe periods in Policy DM18 is at odds with the wording of the policy. However, the proposal is for a temporary period only in response to a national pandemic situation. Economically the country has suffered untold financial losses and the government has sent out a strong message to aid recovery.

It is acknowledged that the use of the caravan sites for this additional period would occur within the highest flood risk period of the year.

That said, the EA raises no objection to the proposal for this limited time period only. For this short time period only, for this site, they consider that if the applicant signs up to the EAs flood warning service and provided flood evacuation measures are safely in place and that people are able to reach places of safety and safe refuges within buildings where emergency services can access for rescue and evacuation, they do not raise objection.

This would be an exception circumstance, where these extended use of the site would take place for a limited time only, outside the scope of the recommended policy occupation period. Members would need to be satisfied that there are sufficient exceptional circumstances, through the unprecedented coronavirus pandemic, to justify such a use, contrary to the general aims of the policy and the NPPF.

Nature conservation sites

The caravan park is adjacent to the following designated nature conservation sites:

- The Wash Special Protect Area (SPA)
- The Greater Wash Special Protection Area (SPA)
- The Wash and North Norfolk Coast Special Area of Conservation (SAC)
- The Wash Site of Special Scientific Interest (SSSI)

The Wash provides important winter feeding areas for waders and wildfowl outside of the breeding season. The enormous numbers of migrant birds that use the site are of international significance and are dependent on the rich supply of invertebrate food found here.

The saltmarsh and shingle communities are also of considerable botanical interest. The site is also a very important breeding ground for the Common seal, containing the largest colony in Western Europe.

It is acknowledged that the scale of this caravan park is significant. This is a potentially a significant number of additional visits to the wider coastal area and the designated areas and your officers required additional information in order to assess the impact of the proposed extended use.

However, in this case the period of time for the additional use being sought is significantly less than that of other sites in the vicinity. The impact on the nature conservation sites will therefore be much less.

During consultation, Natural England stated they had no objection to the proposal, confirming that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Given that this application is one of several applications to increase the use of the site in the vicinity, the LPA needs to consider how the period of extension may impact the sensitive interest features of the Wash and whether it will result in an increase in recreational disturbance impacts over winter, both alone and in combination, including the possible collective effects of a seasonal extension for all other caravan sites (including LPA ref's 20/01265/FM, 20/01268/FM & 20/01269/FM also on this agenda).

Accordingly the applicant has submitted a Shadow Habitat Regulation Assessment (HRA) to assist the local planning authority, as the competent decision making authority, to determine whether the proposals are likely to have a significant effect on any European sites and proceed to the Appropriate Assessment where significant effects cannot be ruled out.

The submitted HRA considers the impact of this and the other three caravan sites upon the Wash and North Norfolk Coast Special Area of Conservation (SAC), The Wash Ramsar Site and The Wash SPA so that the combined effect can be assessed.

The submitted Shadow HRA confirms that because the project is not directly connected with or necessary to the management of the European sites and is likely to have an 'in-combination' significant effect on the identified sites when considered without the counteracting measures (as required by the recent ruling made by the CJEU in the case of People over Wind and Sweetman vs Coillte Teoranta ref: C – 323/17), an Appropriate Assessment is required under the Habitat Regulations 2017. This assesses whether or not it is possible to conclude that there would be no adverse effect on the integrity of the European Sites.

The Shadow HRA proposes counteracting measures for alleviating recreation pressure on the Natural 2000 sites. This comprises information boards at the camp site and information leaflets and designated dog walking routes (that avoid the designated sites completely).

The submitted Shadow HRA concludes that with the counteracting measures identified, particularly the provision of information boards and information packs, the project will not have an adverse effect on the integrity of the Wash and North Norfolk Coast Special Area of Conservation (SAC), The Wash Ramsar Site or The Wash SPA, either alone or in

combination with other plans and projects. It maintains that this may also assist in reducing existing impacts at other times of the year as well.

On the basis of the findings of the HRA the LPA has conducted an Appropriate Assessment.

Members should be aware that the Local Authority (competent authority) is required to determine whether a proposal is likely to have a significant effect on any European site and proceed to the Appropriate Assessment stage where significant effects cannot be ruled out.

A precautionary approach must be taken and if all reasonable scientific doubt of an adverse effect on a site's integrity cannot be ruled out the proposal must be refused unless an exemption is justified. In other words, where an appropriate assessment has been carried out and it results in a negative assessment, or if uncertainty remains over the significant effect, consent can only be granted if there are no alternative solutions for the development, there are Imperative Reasons of Over-riding Public Interest (IROPI) and compensatory measures have been secured.

Therefore, consent should only be granted for projects once the relevant competent authority has ascertained that there will either be no Likely Significant Effect, or (if that is not possible) that there will be no adverse effect on the integrity of the European Site(s) in question.

The findings of the LPA Appropriate Assessment are that:

- The impacts of this development, in combination with increases in visitor numbers resulting from other such developments in the area, have the potential to increase the recreational pressure on the features that the nature conservation areas are designated for.
- The proposed extended use is for a temporary period of time only. Any impact will be short lived with no anticipated long term impact upon the European sites.
- The increase in winter visitors to the park will be offset by the lack of visitors during the forced shutdowns of the caravan parks in 2020.
- The proposal (in isolation or in combination) will not adversely affect the integrity of the European sites. The coherence of the ecological structure and function, across the whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was designated will not be adversely affected given the temporary nature of the proposed extended use.

In order to avoid or reduce any direct adverse effects that may be caused by the proposed extended use, and to ensure that it does not have an adverse effect on the integrity of a habitats site(s), mitigation measures, as proposed in the applicant's Shadow HRA should be implemented.

These measures, including the provision of information boards and information leaflets and designated dog walking routes (that avoid the designated sites completely), could be secured by way of planning condition.

In conclusion, the temporary nature of the proposed extended use, alone and in combination with other sites, would not result in harm to the integrity of the protected nature conservation sites due to the counteracting measures identified. If Members seek to approve the application it is recommended that a planning condition be imposed seeking the implementation of these mitigation measures in a timely manner and a period of three

months is given as an appropriate period of time for compliance, with implementation prior to use outside of the regular season.

Other material considerations

Economy

National guidance and Local Plan policies, including Policy CS10, encourage sustainable economic growth and recognise that tourism industries are key elements of the economic and social vibrancy of the borough. They contribute to the regeneration and growth of the area.

Policy CS10 states that the Council will promote opportunities to improve and enhance the visitor economy by supporting tourism opportunities throughout the borough.

Like the rest of the country, this borough has witnessed a significantly quieter annual tourist offer due to lockdown and restrictions introduced through the tier system. There are now in place government steps to recovery, but this is based upon the corona virus being under control and there is no guarantee how this might evolve over time.

The government changes have been introduced to help the nation recover from the devastating economic losses witnessed during the pandemic so far. By supporting this proposal it would go some way to assisting local businesses through the potential in increased spending power of the additional visitors. In a borough where tourism is such an important economic function, the benefits of the proposal upon the local economy are a key consideration that is part of the planning balance.

CONCLUSION

The application site is in a sensitive location in terms of flood risk and nature conservation. It is an existing caravan site, but with restricted occupational use given the dangers associated with flooding along this part of the coast.

The dangers from flood risk and the risk to human life from high tides will still be present, but the use is only proposed for a short period of time to overcome the pandemic situation. This is part of the planning balance that must be considered as part of this application.

There will be an impact upon nature conservation sites of national importance, but, again, this will be for a limited period of time only. An Appropriate Assessment has been undertaken by the lpa which finds that the proposed temporary extended use of the site will not have an adverse effect on the integrity of the Wash and North Norfolk Coast Special Area of Conservation (SAC), The Wash Ramsar Site or The Wash SPA, either alone or in combination with other plans and projects. The proposed mitigation measures may also assist in reducing existing impacts at other times of the year as well.

Government changes have been introduced to help the nation recover from the devastating economic losses witnessed during the pandemic so far. By supporting this proposal it would go some way to assisting local businesses through the potential in increased spending power of the additional visitors. In a borough where tourism is such an important economic function, the benefits of the proposal upon the local economy are a key consideration that is part of the planning balance.

On balance, for the reasons above, it is recommended that the proposal be supported but subject to planning conditions restricting the extended use only to 31 December 2022.

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RECOMMENDATION:

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

- 1 Condition: This permission is for a temporary period only and allows the extension of seasonal use of land for the caravan park Areas 1,2,3,5 and 6, as shown on Areas Plan Drawing No. AY/02C000854/02, between 15 January and 15 February 2022 and Area 4, as shown on Areas Plan Drawing No. AY/02C000854/02, between 1 October 2021 and 28 February 2022 and between 1 October 2022 and 31st December 2022, and it shall expire on the 31st December 2022.
- 1 Reason: To comply with Section 91 of the Town and Country Planning Act, 1990, as amended by Section 51 of the Planning and Compulsory Purchase Act, 2004.
- 2 Condition: The development has been determined using the following approved plans:

Site Location Plan Drawing No. AY/02C000854/01
Areas Plan Drawing No. AY/02C000854/02
- 2 Reason: For the avoidance of doubt and in the interests of proper planning.
- 3 Condition: Full details of the mitigation measures identified within the Shadow Habitat Regulations Assessment (HRA) Screening Matrix And Appropriate Assessment Statement by Philip Parker Associates, namely the provision of information boards and information packs conveying information and educating residents on how to avoid impacting wildlife and ecologically sensitive habitats in the European nature conservation sites, particularly when dog-walking in the local area, shall be submitted to and approved in writing by the local planning authority within three months of the date of this permission. The boards shall be installed and shall thereafter be retained in situ. Leaflets shall be provided to all visitors to the site during these additional weeks for the full duration of this temporary permission.
- 3 Reason: To ensure that the development takes place substantially in accordance with the principles and parameters contained within the HRA.