

# Planning Committee

18 August 2023

Agenda item number 9.1

## BA/2023/0074, 0075 & 0076/FUL- Aldeby-Waveney River Centre

Report by Senior Planning Officer

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### Proposal

BA/2023/0074/FUL Re-siting and re-design of eight holiday lodges and associated parking spaces and associated operational development. Creation of a landscaped area.

BA/2023/0075/FUL Provision of fifteen touring caravan/motor home/camping pitches (relocated from the central area of the River Centre), access and amenity area.

BA/2023/0076/FUL The siting of seven twin unit chalets (fourteen chalets) and associated parking spaces. Construction of new access road adjacent to the north-western boundary, to create one-way access arrangement. Extension and reconfiguration of existing car parking areas serving the River Centre and Marinas. Erection of new shower/toilet facilities. Removal of existing storage building and shower/toilet facilities.

### Applicant

Tingdene Holiday Parks Ltd

### Recommendation

0074 & 0076 Approval subject to conditions.

0075 Refuse.

### Reason for referral to committee

Application BA/2023/0076/FUL is a major application.

### Application target date

18 May 2023

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## Contents

1.	Description of site and proposals	2
2.	Site history (relevant to these applications)	3
3.	Consultations received	4

Parish Council	4
Environment Agency	4
Norfolk County Council (NCC) Highways	5
BA Tree Officer	5
BA Landscape	6
Internal Drainage Board (IDB)	7
BA Ecologist	7
<b>4. Representations</b>	<b>8</b>
<b>5. Policies</b>	<b>8</b>
<b>6. Assessment</b>	<b>8</b>
Principle of development	9
Impact upon the landscape and trees	10
Highways	14
Ecology	14
Flood Risk	14
Other issues	15
<b>7. Conclusion</b>	<b>15</b>
<b>8. Recommendations</b>	<b>15</b>
<b>Appendix 1 – Location map</b>	<b>17</b>

## 1. Description of site and proposals

- 1.1. Waveney River Centre (WRC) is located in the southern broads and is located approximately 2.5km to the east of the village of Burgh St Peter on the western banks of the River Waveney and Carlton Marshes opposite. It is an established visitor facility consisting of land-based tourism accommodation, recreational and mooring facilities within a marina and an on-site public house and small shop.
- 1.2. The site is in an open and isolated part of the Waveney valley but is well screened to the west with existing hedgerows along Staithe Road, Church Lane and Burgh Road. The site slopes south east from Staithe Road and Church Lane towards the River Waveney and Carleton Marshes Reserve. There are three existing residential properties adjoining the site, these are Old Staithe Cottage which is located on Staithe Road to the south west of the caravan / lodge park, Staithe Farmhouse which is located on the north west side of Staithe Road opposite to the entrance into the River Centre and Goose Cottage which is located within a well screened curtilage to the north east of the River Centre.

- 1.3. Three planning application have been submitted and these relate to three separate areas, as follows:
1. The south-western edge of the site is the existing caravan lodge park which has permission for 46 units in total. It is linear in shape and situated at a lower level to Staithe Road. Between this part of the site and the river is an area of marshland. Application BA/2023/0074/FUL seeks permission to amend the design and siting of eight of these units previously approved in 2007.
  2. The central area of the site comprises the main buildings which include a storage building (previously used as a boat maintenance and repair workshop), a swimming pool building), areas used to accommodate six camping pods and seven yurts, with the remainder of the space used for camping, which is unrestricted. There is also a two-storey building adjacent to the river frontage which houses four holiday apartments and the marina used for mooring boats. Application BA/2023/0076/FUL seeks permission to reorganise this area by removing the storage building, existing shower block, camping pods, yurts and the camping use and replacing them with seven twin unit chalets (fourteen chalets) and associated parking spaces, the construction of a new access road adjacent to the north western boundary to create a one-way access arrangement, the extension and reconfiguration of existing car parking areas serving the River Centre and Marinas and the erection of new shower/toilet facilities.
  3. The third area is land outside of the existing site, comprising a field to the north of Burgh Road. It is currently a grassed area enclosed with hedges and a tree belt which slopes towards the north. There are boundary trees along the east and west boundaries which screen the site. Application BA/2023/0075/FUL seeks permission to create a camping area of fifteen pitches, access and an amenity area including a toilet and shower block.

## 2. Site history (relevant to these applications)

- 2.1. BA/2017/0401/FUL Removal of quay heading, set back by between 2m & 5m and install new quay heading and floating pontoon. Approved.
- 2.2. BA/2016/0356/COND Removal of condition 1: temporary consent and condition 6: passing bay signs, of permission BA/2016/0064/COND. Appeal Allowed.
- 2.3. BA/2016/0355/COND Removal of condition 4: passing bay signs of permission BA/2016/0088/COND. Approved.
- 2.4. BA/2016/0088/COND Change of fenestration, variation of condition 2, and removal of conditions 4 and 7 of permission BA/2015/0360/FUL. Approved.
- 2.5. BA/2016/0064/COND Removal of conditions 1: temporary consent, 3: residential mooring limit, 5: mooring management plan, 6: passing bay signs, 8: vessel size limit and 10: mooring details of permission BA/2015/0251/FUL. Approved.

- 2.6. BA/2015/0360/FUL Restaurant Extension. Approved.
- 2.7. BA/2015/0251/FUL Change of use of marina from leisure to mixed leisure & residential, residential moorings not to exceed a total of 10. Approved.
- 2.8. BA/2013/0310/FUL 6 Camping Pods. Approved.
- 2.9. BA/2010/0392/FUL Proposed demolition of existing outbuildings and replacement with new build 5 unit bed and breakfast accommodation. Approved.
- 2.10. BA/2006/6644/HISTAP Extension to existing caravan site with addition of 8 lodges and new sewerage treatment plant. Approved (S106).
- 2.11. BA/1997/7082/HISTAP Use of land for touring caravans and tents. CLUED Issued 17.02.1999

### 3. Consultations received

#### Parish Council

- 3.1. **0074:** The Parish Council have no objections to this application as it is repositioning lodges that already have planning consent.
- 3.2. **0075:** The Parish Council is strongly opposed to this application and consider it should be refused on the following grounds:
  - Aesthetics
  - Unnecessary extension to the site
  - Unsuitability of the field
  - Access
  - Not sustainable
- 3.3. **0076:** The Parish Council have no objections to this application and consider the removal of the boat repair facility an improvement and more congenial with a recreational site.

#### Environment Agency

- 3.4. No objection subject to the proposal provided you have taken account of the flood risk. Key points from the Flood Risk Assessment are:
  - The site falls across Flood Zones 1, 2 and 3. The majority of the proposed 'more vulnerable' development has been sequentially sited within Flood Zone 1 with the exception of two chalets in 'Area B' which lie partially within Flood Zone 3.
  - The site is at risk of flooding from the River Waveney which floods via both fluvial and tidal mechanisms.
  - The development benefits from the presence of defences. However, the defences have an effective crest level of 1.561m AOD which is below the 1% (1 in 100) annual probability fluvial flood level and the 0.5% (1 in 200) annual probability tidal flood

level, both including climate change. Therefore, the site is at actual risk of flooding during the design event.

- Finished ground floor levels have been proposed at 2.10m AOD. This is above both the
- 1% (1 in 100) annual probability fluvial flood level (1.802m AOD) including climate change. 0.5% (1 in 200) annual probability tidal flood level (2.016m AOD) including climate change. Therefore, the two chalets within Flood Zone 3 will remain dry during the design event.
- There is a safe means of access in the event of flooding from all new buildings to an area wholly outside the floodplain up to a 0.1% annual probability flood event including climate change. A Flood Evacuation Plan has been proposed.
- Finished ground floor levels have also been proposed above the 1% (1 in 100) flood levels including climate change for both fluvial and tidal flooding. Therefore, safe refuge will be available to occupants in an extreme flood.
- Compensatory storage is not required as the FRA states that all chalets built within Flood Zone 3 will be raised with voids underneath.

### Norfolk County Council (NCC) Highways

- 3.5. 0074: No objection.
- 3.6. 0075: No objection subject to conditions.
- 3.7. 0076: No objection subject to conditions.

### BA Tree Officer

- 3.8. **0075:** I visited the site yesterday with the revised layout and Arboricultural Impact Assessment (AIA) and can confirm that the proposed repositioned access does require the removal of a single tree T3 to allow development and the limited pruning back of the hedgerow along most of its length together with a short section to be removed and replacement planting is proposed to reduce the impact of the access.

Whilst the proposed access will change the overriding rural nature of the lane, the tree loss and pruning required is limited and could be replaced and enhanced with suitably robust **tree**, hedge and shrub planting as part of a comprehensive landscaping scheme. If approved, I would like to see a condition requiring full implementation of the submitted and approved Arboricultural Submission and Arboricultural Method Statement recommendations, together with a landscaping scheme aimed at restoring the tree over and length hedge to be removed.

- 3.9. **0076:** No **objection** subject to following recommendations in the AIA.

## BA Landscape

- 3.10. A Landscape and Visual Appraisal (LVA), and AIA have been submitted. The LVA has been carried out by a suitably qualified professional in accordance with best practice guidance.

### Context

The site is within BA Landscape Character Area: 7 Waveney Valley - Burgh St Peter to Haddiscoe Dismantled Railway: *Even in Broads's terms this is an exceptionally remote area...in the main the area has a strong sense of tranquillity, being defined by open, expansive marshland landscapes. As such, the perception is of a remote, largely undisturbed landscape.*

*The Waveney River Centre area, although a valuable tourism asset, somewhat disrupts the unity of the landscape due to the range of different uses. Future development will need to consider its integration with the natural environment so as not to compound existing adverse landscape impacts.*

The site is also close to BA Landscape Character Area: 4 Waveney - Aldeby to Burgh St Peter:

*Overall this landscape has a remote and tranquil feel.*

*The skylines formed by the valley sides on both the north and southern side of the valley are relatively undeveloped which contribute in a positive way to the character of the area.*

- 3.11. **0074: (Summary)** Existing trees should be fully protected as they provide a valuable screening function and without them the lodges would be exposed to views from sensitive receptors.

Although landscaping can be conditioned, further information on landscaping should be provided, particularly for proposed surfacing and drainage of the access road and parking spaces. The layout of the access road, turning area and parking is also unclear. This information should ideally sit within a Landscape Strategy or scheme for the overall site developments.

Consideration should be given to amending lodge design to reduce visual impacts and improve appearance.

There is insufficient information for hard and soft landscaping, suggesting the need for a comprehensive Landscape Strategy or scheme for the overall development proposals.

**No objection** subject to further information and clarification as above.

- 3.12. **0075: (Summary)** There is a lack of information about elements of the proposals in particular hard and soft landscaping.

Cumulative effects on tranquillity and landscape character have not been fully assessed.

The proposals lie outside the main WRC site and are located on the higher flat plateau land making integration more difficult. They would also expand the overall site.

The proposed uses will introduce activity onto an otherwise undeveloped site in a sensitive location, and although use may be seasonal, the development would be permanent and long term.

The WRC is identified by BA LCA as currently disrupting the unity of this landscape due to the range of different uses. The proposals would not integrate successfully with the natural setting and would therefore compound existing adverse landscape impacts. This is without taking into consideration the cumulative effects from other recent tourism developments in the local area. The level of mitigation proposed would not be adequate to address likely adverse effects on landscape character.

I am **unable to support** the application in its present form, and suggest that the proposals require significant amendment, based on further assessment of landscape, visual and cumulative impacts, together with a more detailed scheme of landscape mitigation and enhancement.

- 3.13. **0076 (Summary):** The variety of existing built forms on the central area of the site are relatively contained, although, due to ad-hoc historic development, there is a lack of identity and coherence. The introduction of an additional type of chalet and a toilet block would exacerbate this. This could be balanced by the removal of some existing features and the opening up of a central open space which offer benefits.

However, the proposals in this application are dependent on the relocation of existing camping and caravanning pitches to the nearby upland field site. This application should therefore be considered in association with the other 2 applications for the site, especially the linked proposals of BA/2023/0075/FUL.

The uncharacteristic appearance and potential visibility of chalets to sensitive receptors is of concern and should be addressed.

There is insufficient information for hard and soft landscaping, suggesting the need for a comprehensive Landscape Strategy or scheme for the overall development proposals. Further information for landscaping is required and should not be left to a condition.

No objection subject to further information, clarification, and amendments

### Internal Drainage Board (IDB)

- 3.14. Recommend that a drainage strategy is required with regards to surface water disposal.

### BA Ecologist

- 3.15. **0075 & 0076:** No objections. Providing that the mitigation and compensation measures outlined in the Ecological Impact Assessment are followed at all times during the development, the development is unlikely to have far-reaching ecological impacts. The mitigation and enhancement recommendations set out in section 6 of the Preliminary

Ecological Appraisal (PEA) must be implemented and followed throughout the development. Requirement for a Management Plan and biodiversity enhancements.

## 4. Representations

- 4.1. Broads Society. No objections to 0074. Strongly object to 0075. No objections in principle to 0076 but disappointed at the design.
- 4.2. **0074:** 1 letter from a neighbour regarding noise from the chalets, smells and lack of implementation of the previous landscaping scheme.
- 4.3. **0075:** 6 letters from neighbours raising concerns about increased traffic, road safety, ecological concerns, noise and light pollution, expansion beyond the existing parameters of the centre and adverse impact on the rural character.
- 4.4. **0076:** 2 letters from neighbours raising concerns about noise and light pollution, traffic and road safety, and litter.

## 5. Policies

- 5.1. The adopted development plan policies for the area are set out in the Local Plan for the Broads (adopted 2019).
- 5.2. The following policies were used in the determination of the application:
  - DM5- Development & Flood Risk
  - DM6- Surface Water Run off
  - DM13- Natural Environment
  - DM16- Development & Landscape
  - DM21- Amenity
  - DM22- Light Pollution & Dark Skies
  - DM23- Transport, Highways & access
  - DM29- Sustainable Tourism & Recreation development
  - DM30 – Holiday Accommodation- new provision & retention.
  - DM43- Design

## 6. Assessment

- 6.1. The key considerations in dealing with these applications are, for each of them, the principle of development, impact upon landscape and trees and Highway safety. Other issues will also be considered, including neighbour amenity, flood risk and biodiversity.

- 6.2. This report provides an assessment of all three applications. It will state where the assessment relates to all three applications and, where there are particular issues in respect of one application only, this will be identified, and these will be explained.

### Principle of development

- 6.3. In terms of the principle of development, national planning policies and the Local Plan for the Broads (2019) are supportive of encouraging a prosperous rural economy. In particular, Paragraph 84 of the NPPF highlights the importance of sustainable rural tourism in the rural economy. Paragraph 85 of the NPPF, however, places great emphasis on the suitability of the location where the development is proposed, specifically with regards to connections to existing settlements, impact on local roads and sensitivity to surroundings and Paragraph 176 places great weight on conserving and enhancing the landscape, wildlife, and cultural heritage in the Broads.
- 6.4. The principal policy to use in the assessment of these applications is Policy DM29. The objective of this policy is to direct tourism and recreational development to appropriate and sustainable locations with the necessary infrastructure and facilities. The policy applies to proposals for new tourism development and schemes at existing sites. Criterion (a) seeks to direct such development to sites within development boundaries or locations associated with existing visitor or tourism activities. The Waveney River Centre has been a tourism site offering a variety of accommodation types since the 1950s. The proposals are therefore considered to comply with this element of the policy.
- 6.5. There is a supplementary part to criterion (a) which requires that the development must be satisfactorily accessed by sustainable means, which could include public transport, walking, cycling, horse riding or by water. As noted at 1.2 above, the site is in a remote and isolated location, with limited options for access other than by private car. The proposals, however, seek to alter and reconfigure the types of accommodation on site and do not seek to add additional accommodation. In this respect, the proposals are considered to comply with this element of the policy. It should also be noted that highway improvements have been implemented in the way of passing places and signage, in connection with previous development here.
- 6.6. The second part of DM29, criterion (b), sets out the principles of sustainable tourism and recreation. The requirements in (b) for sufficient capacity of the highway network (vi), sufficient on-site parking (vii) and that there should be no adverse impact on navigation (x) are met by all three applications and this is noted.
- 6.7. Criterion (b) also requires that there should be no adverse impact on landscape character or protected species (viii), that the design should be of a high quality suitable for the setting (ix) and the scale of the new development should be compatible with the location (xi). It is considered that applications 0074 and 0076, which are located wholly within the existing boundaries of the site, meet the remaining criteria of Policy DM29, so are acceptable. However, there are concerns that these elements are not met by the development proposed under application 0075, particularly in respect of landscape

character and scale. These issues are discussed further below but overall, it is considered that these criteria in Policy DM29 are not wholly met in respect of this application.

- 6.8. The final part of DM29 requires that regard be given to the cumulative impacts of tourism and recreation proposals on landscape character, nature conservation value and local transport movement. This is supported by the Reasoned Justification which sets out the importance the quality of the natural environment has on the tourism economy and notes that intensive tourism and leisure uses can detract from the special qualities of the Broads upon which tourism relies. It is worth noting that a use does not have to involve a large area or high visitor numbers for it to be intensive, as intensity is relative, so a modest level of activity in a small geographical or constrained area can result in a use that is experienced as intensive.
- 6.9. Camping, glamping and other 'light touch' accommodation types have become popular in recent years, particularly so in 2020 and 2021 with alternative holiday options significantly restricted. They are often presented as minimal or 'low impact' forms of development, however whilst the tents or yurts themselves may have a sense of impermanence around them, these sites usually require some form of permanent infrastructure to support the use (for example toilet and shower facilities, mains connections and parking areas), and these tend to have a more significant impact on the character and appearance of an area. Furthermore, they remain when the tents and other lightweight structures are removed at the end of the season, so introduce a form of permanent development which contrasts with the 'light touch' accommodation they support. It is also worth noting that when the principle of a tourism use has been established, albeit by 'light touch' accommodation, the LPA may find it difficult to resist replacement accommodation in the form of lodges or other such structures in the future, either when the popularity of glamping has passed or the operator wishes to upgrade the site's offer. Whilst applications must be judged on their own merits, the likelihood of further development can be considered, particularly where permanent infrastructure is being provided.
- 6.10. Application 0074 relates to 8 lodges that already benefit from planning permission. Application 0075 relates to 15 touring pitches suitable for caravans and tents as well as access road and track and Shower/WC block in an area currently just an open field. Application 0076 seeks to remove some existing elements of accommodation permitted in the area and to replace with twin units. As the existing camping use is unrestricted (as permission was granted by a CLUED and not a planning permission), it is noted that there is no overall increase in units of accommodation at the site, but the placement of the camping provision into a new area, will extend the current boundaries of the WRC into the wider landscape.

### **Impact upon the landscape and trees**

- 6.11. Policy DM16 (Development and landscape) requires planning applications to clearly demonstrate that the development proposals are informed by the Broads Landscape

Character Assessment (2017) (LCA); there is also a strong preference for applications to be accompanied by a Landscape Visual Impact Assessment (LVIA) taking the LCA into account. These applications include a Landscape and Visual Appraisal (LVA), which has been undertaken with regard to best practice guidance.

- 6.12. The application sites are located in in the Local Character Area 7 (Waveney Valley - Burgh St Peter to Haddiscoe Dismantled Railway) which is described in the LCA as follows:

- 6.13. *"... Even in Broads's terms this is an exceptionally remote area... in the main the area has a strong sense of tranquillity, being defined by open, expansive marshland landscapes. As such, the perception is of a remote, largely undisturbed landscape.*

*The Waveney River Centre area although a valuable tourism asset somewhat disrupts the unity of the landscape due to the range of different uses. Future development will need to consider its integration with the natural environment so as not to compound existing adverse landscape impacts."*

- 6.14. The site is also close to Landscape Character Area 4 (Waveney - Aldeby to Burgh St Peter) which is described in the LCA as follows:

- 6.15. *"... Overall this landscape has a remote and tranquil feel. The skylines formed by the valley sides on both the north and southern side of the valley are relatively undeveloped which contribute in a positive way to the character of the area."*

- 6.16. Looking first at the two applications located within the existing site, application 0074 seeks to relocate eight lodges which were previously approved at the western edge of the site, where there is permission for 46 lodges in total set in a linear arrangement facing the marshes. The reason for the proposal is that the design of the lodges is different to that previously approved and the layout will be improved. The proposed lodges 1 - 6 would be sited on an existing area of unused grassland in the furthest part of the site to the south-west, similar to the extant approval. The remaining two lodges (no.s 7 and 8) would be located on an existing area of landscaping within the site instead of at the western end. This would result in a small loss of amenity landscaping but will provide a more spacious layout overall.

- 6.17. The LVA viewpoint of most relevance is no. 5, which is north-westwards from the flood bank on private land approximately 195 metres east of proposed lodges 7 and 8. This shows that the existing lodges have a low visual impact due to their subdued colours and low elevation.

- 6.18. In addition, a planting plan has been provided which shows proposals for screen planting at the western end of the site, adjacent to the neighbouring property. This includes a variety of native tree and shrub species which would provide biodiversity benefits and screening for the adjacent property.

- 6.19. Overall, it is considered that the relocation of the lodges as proposed would not have an adverse impact on the landscape and there would be benefits arising from the

screen planting. This application is therefore in accordance with Policy DM16 of the Local Plan for the Broads.

- 6.20. Application 0076 is also within the existing site and this seeks permission to remove some elements of accommodation, including the camping pods, yurts and the touring/camping area, and to replace these with 7 x twin unit chalets. The supporting documents explain that the applicant seeks to reduce the amount of 'clutter' within the central area and allow for an area of open space. It is also proposed to reconfigure the access, extend the car park and construct new shower and WC facilities. There is currently an authorised use for camping in this central area and this would be lost if permission is granted.
- 6.21. The Preliminary Ecological Appraisal (PEA) identifies that the proposals would result in the loss of approximately 0.13 hectares of modified grassland to achieve the proposed access road and chalets. In addition, small hedgerow sections which currently divide the pitches would be lost, as well as two semi-mature Bird Cherry trees near the existing site entrance. These losses are considered to be minor and capable of being mitigated.
- 6.22. The AIA acknowledges the risk of harm to existing trees and outlines methods for addressing this. Some proposals are shown close to existing trees and hedgerow. The AIA shows that the northern parking area is located within the Root Protection Areas (RPA) of trees and indicates no-dig construction within these and other RPAs. A condition requiring compliance with the AIA can be added to a permission.
- 6.23. The 7 new twin unit chalets (14 units) would be permanent features in contrast to the existing camping and motorhome pitches which tend to be temporary and seasonal and so the potential visual effects of the chalets could be greater. However, the designs of the chalets are low profile (height of 3.7m) and simple in form with grey cladding and black roof tiles and will be seen from the water with the backdrop of the hedgerow and the foreground of the marina, an area of open space and the marina car park.
- 6.24. The proposed toilet/shower block would be located in the east corner of the site against a backdrop of trees. It will be constructed of timber clad walls stained black with grey corrugated metal sheet roof would provide an acceptable appearance.
- 6.25. A full landscaping scheme for the area of open space in the central area and the exact materials of the hard landscaping should be conditioned and this should include the PEA recommendation of at least 70m of new hedgerow to compensate for the loss of hedgerow dividers between pitches, and at least three new native trees.
- 6.26. Overall it is considered that the proposal will improve the visual appearance of the site, particularly when viewed from the river and the proposal on balance is considered to be in accordance with Policy DM16 of the Local Plan for the Broads.
- 6.27. The third application (0075) proposes the relocation of the camping facility of the site (a total of 15 pitches) to land to the north-west, beyond the existing site boundary. The application arises from discussions with Broads Authority officers, who were concerned

that the proposal to reconfigure and declutter the central area of the site (application 0076) would result in the loss of the camping facilities and the opportunity for a low cost holiday in this part of the Broads.

- 6.28. The proposed site is currently a grass field, areas of which would be replaced with hard surfacing (exact materials are unclear), together with the footprint of the toilet/shower building and pedestrian path.
- 6.29. A new road entrance onto the land would be required, and the proposed vehicular access would involve construction of a light industrial access specification involving hard surfacing and kerbing to accommodate 2-way movement controlled with carriageway markings and highway signage. This would be uncharacteristic in appearance and scale in the context of this small country lane. The submitted plan shows hard surfacing and kerbing extending into the site for a considerable distance. However, the extent and appearance of such surfacing and kerbing is not clear. The proposed compensatory planting could take considerable time to grow and may not fully mitigate the presence of a new vehicle access.
- 6.30. Furthermore, in order to meet Highway requirements for visibility, a 30m section of Priority Hedgerow (as identified in the Ecological Assessment) to the west of the access, would require cutting back. Although it would be retained, the works would diminish its size, viability and ecological value. Replacement planting is proposed.
- 6.31. The scale and appearance of caravans, motorhomes and some tents can be significant as colours tend to be light and materials reflective. Pitches would be separated from each other by hedgerow planting to provide privacy to the individual pitches but these are unlikely to be substantial enough to provide adequate screening from the wider landscape. There would also be insufficient space between the southern side of pitches and the visibility splays along Burgh Road to provide adequate screening for users of the road.
- 6.32. The existing tree belt to the north does appear to allow filtered views suggesting potential visibility from the valley to the north. Sensitive receptors using Angles Way, and other Public Rights of Way on the northern side of the valley may be too distant to obtain views of the site. However, this has not been assessed in the LVA. Public access to Carlton marshes reserve includes Petos marsh across the river from the site. It may be possible for users of the paths along the riverbank to gain views of St. Mary's church from the north east but this has not been assessed. However, if caravans were to be visible as a backdrop, this could be considered as affecting the setting of the Listed church.
- 6.33. The LVA identifies impacts of proposals and mentions planting as mitigation. 8.16 considers the impact without mitigation to be moderate adverse. However, such conclusions do not seem to have informed a scheme of Landscape mitigation. Although landscaping can be conditioned there is a lack of information, suggesting that this has not been adequately considered.

- 6.34. As noted in the LCA, the area has a strong sense of tranquillity, with a perception of a remote, largely undisturbed landscape. The proposed change of use from an undeveloped agricultural field to a caravan/camping site would represent an intensification of use with activities likely to undermine tranquillity in addition to adverse landscape and visual effects. The LVA does not consider cumulative effects in relation to the Waveney River Centre site and other recent camping/glamping developments in the local area. Although there is a lack of assessment of cumulative effects and incremental impacts on tranquillity, it seems likely that cumulative adverse effects would arise. Overall, the proposals would involve a loss of a characteristic landscape features and the creation of development in an otherwise undeveloped and rural landscape, contrary to Policy DM16 of the Local Plan for the Broads.

### Highways

- 6.35. The proposals seek to change the types of accommodation on offer at the WRC and do not propose to increase the number of units. A Transport Statement was included with the application and after some initial concerns regarding highways were highlighted, the applicant subsequently revised the visibility splays. The Highways Authority has confirmed that they therefore have no objections to the proposals subject to conditions and there is not considered to be any conflict with Policy DM23 of the Local Plan for the Broads in this regard.

### Ecology

- 6.36. A Preliminary Ecological Appraisal Report was submitted by the applicant and the BA Ecologists have confirmed that no further surveys are required and that there is no objection subject to conditions and biodiversity enhancements. There is therefore no conflict with Policy DM13 of the Local Plan for the Broads in this regard.

### Flood Risk

- 6.37. A Flood Risk Assessment was included in the application and the Environment Agency have confirmed that they have no objection to the proposal.
- 6.38. The site falls across Flood Zones 1, 2 and 3. The majority of the proposed 'more vulnerable' development has been sequentially sited within Flood Zone 1 with the exception of two chalets in 'Area B' which lie partially within Flood Zone 3.
- 6.39. Finished ground floor levels have been proposed at 2.10m AOD. This is above both the 1% (1 in 100) annual probability fluvial flood level (1.802m AOD) including climate change and 0.5% (1 in 200) annual probability tidal flood level (2.016m AOD) including climate change. Therefore, the two chalets within Flood Zone 3 will remain dry during the design event.
- 6.40. In addition, there is a safe means of access in the event of flooding from all new buildings to an area wholly outside the floodplain up to a 0.1% annual probability flood event including climate change. A Flood Evacuation Plan has also been proposed and can be conditioned. The proposals are therefore considered to comply with Policy DM5 of the Local Plan for the Broads.

## Other issues

- 6.41. The proposals are not considered to adversely impact on the amenity of existing neighbouring properties given the distance these properties are from the site and the existing operation of the river centre. The proposal therefore accords with Policy DM21 of the Local Plan for the Broads.

## 7. Conclusion

- 7.1. The principle of the proposals is generally acceptable as the site is an existing tourism facility within the Broads and the criterion of Policy DM29 are considered to be met by applications 0074 and 0076. These applications are also considered to be acceptable in terms of ecology, landscape and trees, flood risk, highways and the amenity of neighbouring properties.
- 7.2. Application 0075 relocates the existing camping area outside of the current boundary of the river centre towards the north-west. This will result in new development encroaching into the open countryside where it is considered it will result in an adverse visual impact on the character and appearance of the rural location. This application is therefore considered to be contrary to Policy DM16 and Policy DM29 of the Local Plan for the Broads.

## 8. Recommendations

- 8.1. 0074: Approve subject to the following conditions:
- Time Limit
  - In accordance with submitted plans
  - Occupation restriction to holiday accommodation
  - No additional lighting without permission
- 8.2. 0075: Refuse for the following reasons:
- The application fails to comply with all the required criteria set out in Policy DM29 (Sustainable Tourism and Recreation Development), in particular, with regards to not adversely impacting on the landscape character of the area (viii). Furthermore, the cumulative impact of additional tourism and recreation accommodation in the locality is considered to result in an adverse impact on the landscape character.
  - The application fails to demonstrate that the proposal will not result in an adverse visual impact on the landscape quality of the area contrary to Policy DM16 of the Local Plan for the Broads. Furthermore, additional recreational pressures, noise and disturbance would inevitably arise due to the increase in visitors outside of the existing boundary of the River Centre and the activities they are likely to undertake at the site, contrary Paragraph 185 of the NPPF.
- 8.3. 0076: Approve subject to the following conditions:

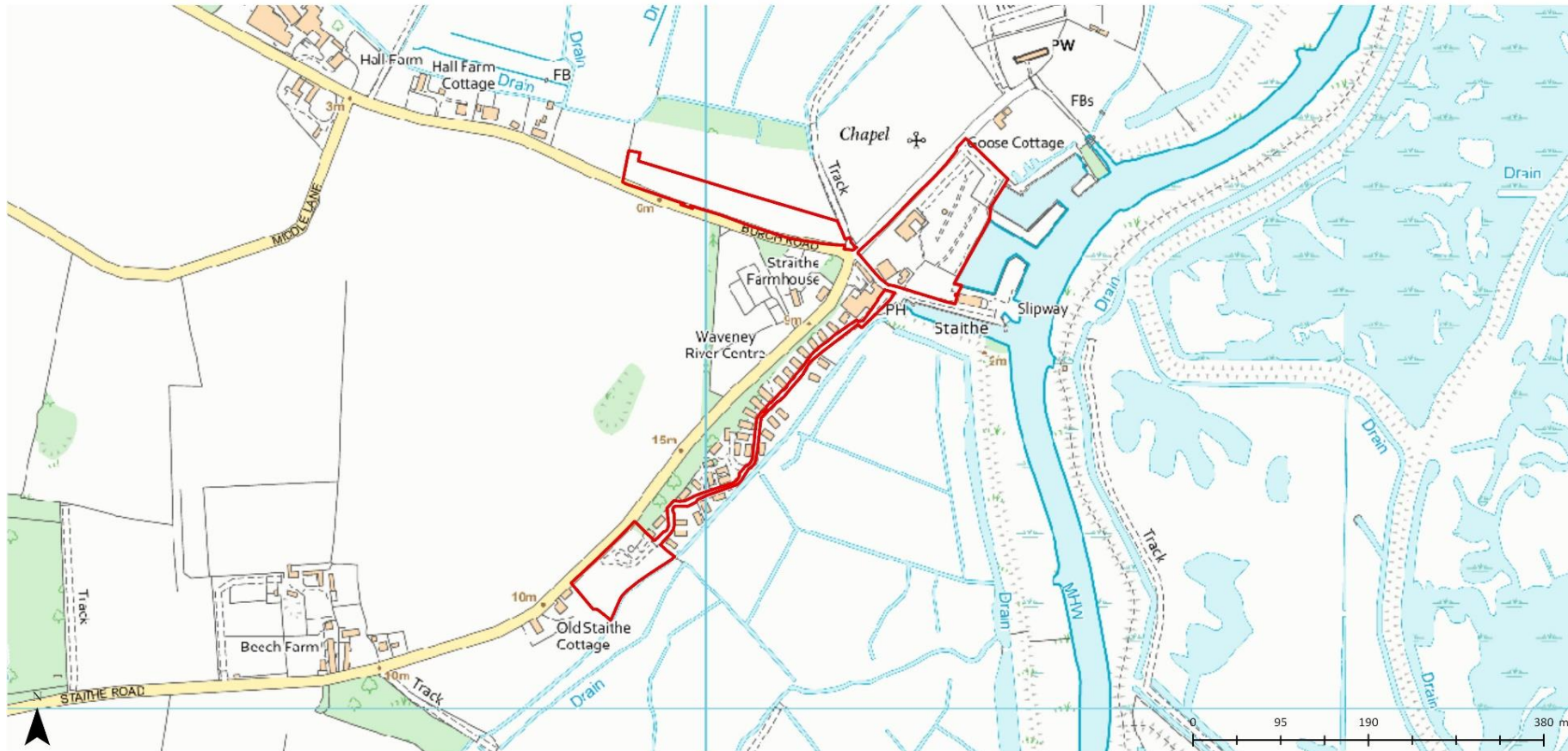
- Time Limit
- In accordance with specified plans
- Highways conditions
- Biodiversity enhancements
- In accordance with AIA
- Occupation restriction to holiday accommodation.
- Landscaping scheme
- No camping in the open amenity area as shown on the plans.
- In accordance with FRA and Flood Evacuation Plan
- Notwithstanding the approved plans, no additional lighting without permission.

Author: Cheryl Peel

Date of report: 02 August 2023

Appendix 1 – Location map

## Appendix 1 – Location map



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