

PLANNING, DESIGN AND ACCESS STATEMENT

Application for Additional Holiday Lodges Inclusive of Permanent On-Site Warden
Accommodation

Lode Hall Lodges – Three Holes



Collective Community Planning Ltd
Registered in England and Wales: 12190918
VAT no 332 8915 90
www.collectivecommunityplanning.co.uk



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AS Johnson and Son Ltd

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Author:	Ruth Harris
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Executive Summary

This statement is in support of the extension of the holiday park located at Lode Hall with the inclusion of one of the proposed lodges being allocated as wardens' accommodation, enabling year-round occupation.

The holiday park is an established business nestled within a rural setting to the west of Downham Market. The extension and incorporation of a lodge allocated for an on-site warden will enable the growth of a local rural business. Allowing the holiday park to open their doors to a larger number of customers, and thus increasing their client range and booking numbers.

The siting of a permanent warden on site will enable all customer issues to be resolved promptly and avoid general disturbance to others, both on site and in the wider area. It will further enable someone to be on hand to continue the care and attention the site is known for, thus in turn increasing its revenue. This is vital given the current economic climate that has been seen over the past few years.

The proposal is in line with local and national policy, as set out within this statement, and should be offered full support by Kings Lynn and West Norfolk Borough Council.

1 Introduction

This planning, design and access statement has been prepared by Collective Community Planning on behalf of AS Johnson and Son Ltd, to accompany a planning application submitted to Kings Lynn and West Norfolk Borough Council.

The applicant wishes to obtain permission for the extension of the existing holiday park at Lode Hall with an increase of lodges to 35, with 20 previously approved under application reference 13/01246/FM for a revised design that was originally approved under reference 12/02053/F. The Applicant would like to retain the existing operational conditions of all year-round usage without exemptions as detailed in both above referenced planning permissions under Condition 6. This is with the inclusion of one of the lodges being used for onsite warden accommodation to serve the 30 pitches proposed.

This document provides supporting information to assist in the determination of the application including details of the proposed development, the proposed application site, current adopted policy context and how the development meets the requirements of this policy.

In accordance with advice contained within the National Planning Practice Guidance and Part 3, Section 7 of the Town & Country Planning (Development Management Procedure) (England) Order 2015 (as

amended) this Statement has been prepared to provide details of the development to the Local Planning Authority with supporting information to inform the decision-making process.

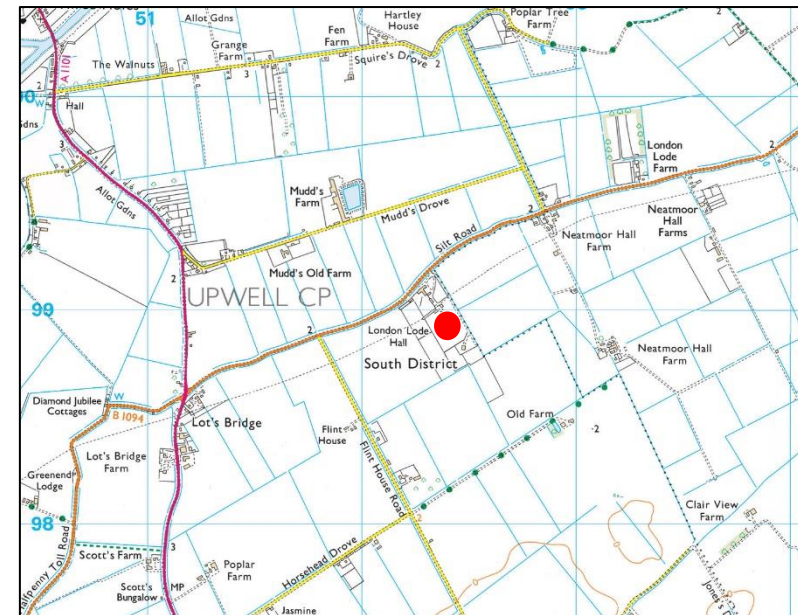
2 Site and Wider Context

Lode Hall is a well-established holidaying destination with not only the holiday lodges but also several buildings within the complex let out for holiday makers and such like. The site has existing access, with the site layout and design orientated to the tourism market.

The location of Lode Hall can be seen on the ordnance survey extract adjacent, with the site denoted by a red circle.

Located within easy reach to the West and North Norfolk coastline and beyond the holiday park is ideally positioned to offer a great base for exploring.

The tourism and visitor economy are incredibly important to the vitality and strength of not only Lode Hall and other similar businesses but also Kings Lynn and West Norfolk as a region.



3 The Proposal

The proposal for expansion of the site and the inclusion of onsite warden's accommodation will not result in any immediate nor detrimental impacts upon the surrounding landscape or biodiversity. Indeed, the proposed use of one of the lodges for the warden's accommodation will result in no additional impact. Instead, providing a welcome point for visitors which the site currently lacks. The proposed warden's accommodation will be located within plot 1 as shown on the plan below:



The lodge at plot 1 will be clearly signed as the office. It's location will enable visitors to park and make use of the facilities, as required, whilst they are directed to their stay. The use of the exact style of lodges already found on the site means that the warden's accommodation will marry in well given the current use and proposed expansion.

Provision of the warden's accommodation, particularly with the site seeking to expand, enables for a secure site with on hand assistance to those who need it. This combined with a user friendly and welcomed

entrance into the park only enables for further promotion of the site and its abilities to promote itself within the tourism sector.

4 Planning History

The following applications have been deemed as relevant to the application proposed:

Reference Number	Proposal	Decision
13/01246/FM	Proposed siting of 20 timber clad holiday caravans including buffer zone (revised design).	Approved
12/02053/F	Proposed siting of 20 timber clad holiday caravans in lieu of 20 all year-round touring caravans with peripheral and supplementary landscape planting.	Approved
12/01104/F	Variation of Condition 8 attached to planning permission 06/00362/CU.	Approved

Reference Number	Proposal	Decision
09/02089/F	Construction of amenity building in connection with holiday park.	Approved
08/02560/F	Standing of mobile home for site manager.	Withdrawn
06/00362/CU	Change of use of cricket field to touring caravan site and ancillary recreations area.	Approved

As can be seen from the table above, the planning history demonstrates the site has been within the tourism sector since 2006, when its change of use was approved. It also shows the long-standing nature of the site to be one which has evolved from touring caravans to lodges.

5 Planning Policy

This section of the statement sets out the policy context within which the proposed development is considered.

The plan-led approach for development is enshrined in Section 38(6) of the Planning and Compulsory Purchase Act 2004 which requires

decision makers to determine applications in accordance with the Development Plan, unless material considerations indicate otherwise.

When interpreting Section 38(6) of the Planning and Compulsory Purchase Act, one should draw on the well-known judgments of Lord Clyde in the 1997 City of Edinburgh case. Debate has centred on whether s.38 (6) means that a proposal must accord with every policy in the development plan, or whether on-balance it accords with the plan when taken as a whole.

More recently, Lord Clyde's position in the City of Edinburgh Case was reaffirmed by Justice Holgate in June 2017 through *Dignity Funerals Limited v Breckland District Council and Thornalley Funeral Services Limited* [CO/497/2017]. He usefully summarised the legal position as follows, which re-affirms the correct approach to the s.38 (6) exercise:

"Conflict with one particular policy may be treated as having an adverse impact and yet of relatively little weight. At the same time, the decision-maker may consider that compliance with other policies designed to secure that development in general takes place without causing significant harm to a range of environmental factors, does involve a greater degree of compliance with the development plan than the non-compliance. The decision-maker is entitled to regard compliance with those policy considerations (even in the sense of simply avoiding harm) as having a greater priority or importance than the non-compliance with a policy designed to protect one other aspect, such as the landscape."

This means that the planning balance is always a matter of balancing the degree of policy compliance (i.e. benefits or lack of harm) with the degree of policy non-compliance or harm, suitably weighted according to importance or relevance, and bearing in mind any material considerations that would invite a departure from the development plan. It should be noted that this means that even where there is no material impact, such as for example on amenity, this, as policy compliance, must be treated as a benefit that weighs in favour of the proposal. Not to consider all benefits in the planning balance, even those neutral impacts which are policy compliant, is to err in law.

5.1 National Planning Policy

The National Planning Policy Framework (NPPF), adopted in March 2012 and revised in July 2021 sets out the Government's planning policies and how these should be applied, providing a framework within which locally prepared plans for housing and other development can be produced. It emphasises that Local Planning Authorities should follow the approach of the presumption in favour of sustainable development and that "development that is sustainable should go ahead, without delay".

The NPPF emphasises the need to plan positively for appropriate new development so that both plan-making and development management

are proactive and driven by a search for opportunities to deliver sustainable development.

'For decision-taking this means:

a) approving development proposals that accord with an up-to-date development plan without delay; or

b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'

It provides an underlying theme in which the planning system should contribute to and enhance the natural and local environment in a number of ways. This includes protection and enhancement and preventing new and existing developments from detracting from the environment. It notes that Local Planning Authorities should look for solutions rather than problems and decision-takers at every level should seek to approve applications for sustainable development where possible, with Local

Planning Authorities working proactively with applicants to secure developments that improve the economic, social, and environmental conditions of the area.

The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

Paragraph 15 states:

'The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.'

NPPF paragraph 81 suggests:

'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can

be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential'.

5.2 Local Planning Policy

The Local Development Plan (LDP) guides development within the borough setting out the long-term future by outlining areas of growth and how this will be delivered. The plans which make up the LDP include the Core Strategy (CS) and Site Allocations and Development Management Policies Plan (SADMP).

All relevant policies to this proposal are detailed in the table below:

Policy	Summary
Core Strategy (2011)	
CS01 – Spatial Strategy	Development priorities for the borough will be to facilitate and support the regeneration and development aspirations identified, encourage economic growth and inward investment, improve accessibility for all to services including health, protect and enhance heritage and cultural assets and foster sustainable communities.

CS06 – Development in Rural Areas	The strategy for rural areas is to promote sustainable communities and patterns of development to ensure strong, diverse, economic activity. Maintain local character, focus new development in key rural service centres and ensure employment, housing, services, and other facilities are provided in close proximity.
CS10 – The Economy	The local economy will be developed sustainably to facilitate job growth in the local economy and increase the proportion of higher skilled jobs.
CS12 – Environmental Assets	Proposals to protect and enhance the historic environment and landscape character, biodiversity and geodiversity will be encouraged and supported.
Site Allocation and Development Management Policies Plan (2016)	
DM1 – Presumption in Favour of	When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the

Sustainable Development	National Planning Policy Framework. It will always work proactively and jointly with applicants to find solutions that allow proposals to be approved wherever possible, and to secure development that improves the economic, social, and environmental conditions in the area. Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.
DM6 – Housing Needs of Rural Workers	To ensure that new development in the countryside is carefully controlled, the proposed approach is to ensure that new rural occupational dwellings are only permitted where it relates to a proven need for a worker to live near their place of occupation.
DM11 – Touring and Permanent Holiday Sites	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.
DM15 – Environment, Design and Amenity	Development must protect and enhance the amenity of the wider environment including its heritage and cultural value. Proposals will be assessed against their impact on neighbouring uses and their occupants as well as the amenity of any future occupiers of the proposed development.

6 Detailed Assessment

Below the site-specific details and arrangements for the site have been considered in turn and balanced against the relevant planning policies both Nationally and Locally.

6.1 Principle of Development

The site is already used for holiday lodges having permission for 20 pitches and the associated existing amenity buildings stemming from the original change of use application reference 06/00362/CU. The

provision of holiday accommodation is seen as important to help ensure the availability of short stay holiday accommodation in the area.

Paragraph 84 of the NPPF deals with supporting a prosperous rural economy, and states that planning should enable the sustainable growth and expansion of all types of business in rural areas. This is both through conversion of existing buildings and well-designed new buildings and should support sustainable rural tourism and leisure developments which respect the character of the countryside.

Adopted Core Strategy Policy CS10 relates to the economy and advises new tourist accommodation in rural areas will be supported subject to meeting criteria relating to location, design, landscape impact and securing the development permanently in tourism use.

Policy DM6 refers to housing for rural workers and is relevant given that this proposal seeks on-site warden’s accommodation. This policy states that:

- Development proposals for occupational dwellings must demonstrate the stated intentions to engage in farming, forestry, or any other rural-based enterprise, are genuine, are reasonably likely to materialise and are capable of being sustained. Proposals should show that the needs of the intended enterprise require one or more of the people engaged in it to live nearby.

- Agricultural or rural based occupancy conditions will be placed on any new permanent or temporary occupational dwellings specifying the terms of occupation.

In this case the holiday park already exists and the proposed extension and incorporation of the warden's accommodation further reiterates the successful nature of the site and business it generates.

Policy DM11 (Touring and Permanent Holiday Sites) of the SADMP refers to the five location requirements that must be met for extensions to existing holiday sites. The location requirements are:

- The proposal is supported by this statement which seeks to detail how the site will be managed along with its success as well as how it will support tourism and 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:
- The site can be safely accessed:
- It is in accordance with national policies on flood risk; and
- 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.

Provided the development proposal accords with the provisions of the NPPF and policies of the development plan, which the site does, it can be fully supported by Kings Lynn and West Norfolk Council.

6.2 Design and Layout

The design of the proposed extension and warden's accommodation has been chosen to seamlessly merge into the site as though it was always there. The style of lodge proposed, and which is already seen on the site offers a modern yet traditional form of accommodation for Lode Hall guests, an example of the style of lodge can be seen below:



The site and its boundaries will be further enhanced by the proposed extension, with the site maintaining its enclosed and private feel by way of natural screening.

6.3 Highway Safety (Parking, Access, Layout)

Highway safety and appropriate parking is something that is paramount when seeking to alter aspects of an existing campsite. With the increased number of lodges proposed additional parking has been allocated within the site boundary. This will enable guests to park within close proximity of their lodge. The increase in guest numbers will be minimal in the context of the surrounding road network.

The existing access from the B1094, Silt Road, will remain unchanged. Appropriate visibility all direction can be achieved, and the sweeping entrance helps ensure road users have all appropriate requirements to remain safe.

6.4 Residential Amenity

There are no nearby properties whose amenities would be affected by what can be considered as a relatively minor change to the site, given its existing use as a holiday park and the number of lodges which there is permission for.

6.5 Heritage

Contura Heritage were commissioned to complete a heritage impact assessment for the proposed site. The full report can be found within Appendix 1 and should be read alongside this statement and the summary provided below.

The inherent moderate significance of both the hall and its stables/coach house will not be negatively affected by the development; the proposal will result in some change to the wider setting of the heritage assets. However, the asset's moderate significance is not dependant on this wider setting therefore the significance of the asset is not affected by this change in terms of the NPPF.

It is important to bear in mind the above-mentioned Conservation Principles that state that if conflict cannot be avoided, the weight given to heritage values in making the decision should be proportionate to the significance of the place and the impact of the proposed change on that significance. The greater the range and strength of heritage values attached to a place, the less opportunity there may be for change, but few places are so sensitive that they, or their settings, present no opportunities for change.

The significance of the place is relatively low and is not overly sensitive to the proposed change. The site makes a neutral contribution to the

significance of the assets and the proposed lodges can be integrated into the existing site.

The proposal comes with a number of benefits which will also benefit the heritage assets outweighing any perceived less than substantial harm. Public benefits⁸ may follow from many developments and could derive from anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.

Examples of heritage benefits may include:

- Sustaining or enhancing the significance of a heritage asset and the contribution of its setting.
- Reducing or removing risks to a heritage asset.
- Securing the future optimum viable use of a heritage asset in support of its long-term conservation

The proposal will provide a number of public benefits as set out below:

- Securing the future optimum viable use of London Lode Hall as holiday accommodation and wedding venue due to increased business and footfall.

The development complies with the requirements of Section 66 (1) of the Planning (LB and CA) Act, section 16 of the NPPF and other relevant national and local policies, advice and guidance.

6.6 Sustainability

The requirement to be sustainable and environmentally conscious is something that is a priority for Lode Hall and the holiday park. Paramount to this is ensuring that the accommodation provided is energy efficient.

The use of rainwater harvesting on each lodge further demonstrates that where possible all appropriate measures are being taken.

Having a warden on site will also in turn reduce the number of traffic movements, currently someone is having to travel from outside of the site to attend any issues and receive new guests. All of which is key in the combined fight to seek resolutions however small to limit the impacts and development of climate change.

6.7 Tourism and Economic Impact

Within this area tourism is a key source of income for many of the residents. There is a commercially competitive need to ensure that a site such as Lode Hall is offering everything it can be.

The addition of further lodges, including one as warden's accommodation, again provides the service that most visitors desire. Having someone on site would allow Lode Hall to open its doors to a wider clientele base, which would significantly boost its income stream.

The seasonality of such a business, results in the need for continuous growth and development. In this instance the type of lodge proposed, in line with those already seen on site, would enable continued occupation all year from visitors far and wide. Again, the benefit of having someone permanently residing onsite managing this is immeasurable. Further promoting the site and allowing it to set itself above the rest.

6.8 Landscape and Biodiversity

Glaven Ecology were commissioned to complete an ecological assessment for the proposed site. The full report can be found within Appendix 2 and should be read alongside this statement and the summary provided below.

The site sits within a SSSI Impact Risk Zone for the Ouse Washes. All planning applications extending outside of existing settlements, including non-residential developments where the footprint exceeds 0.2ha require further consultation with Natural England. However, it is assessed that the that proposed development will not give rise to any likely significant effects upon any designated sites.

The site consisted of approximately of approximately 2.5 ha of maintained grass and rough grassland with hawthorn and hazel hedges with arable land in the west. There were also areas of gravel and garden shrubs around the existing lodges on site. No further surveys for protected species are deemed necessary.

Mitigation measures recommended include:

- Tree protection as per guidelines within BS 5832 (2012).
- External lights associated with the development should use warm white lights at <2700k.
- Sensitive timing for vegetation clearance.
- New hedgerow planting along site boundaries.

Based on successful implementation of mitigation measures and other safeguards, no significant adverse effects are predicted as a result of the proposed.

Enhancements recommended for the site include the installation of bat boxes and bird boxes as well as bat friendly landscaping.

6.9 Flood Risk

Geoff Beel Consultancy were commissioned to complete a flood risk assessment (FRA) for the proposed site. The full report can be found within Appendix 3 and should be read alongside this statement and the summary provided below.

The FRA concludes the following:

- The proposed development is not in a Functional Floodplain. It is located in the Passive Floodplain protected by Middle Level and Environment Agency defences to a 1 in 100-year return period.
- Although the site is partly in fluvial Flood Zones 2 & 3 of the Council's Maps, the actual risk of the site flooding from any fluvial main river or main drain is very low (less than 1.0%)

- Although the site is located within an Internal Drainage District with a standard of drainage of 1 in 50 years, this accords with Defra guidelines for rural development. A minimum of 900mm freeboard is provided within the main drain design standard to the lowest land level which provides further storage to cater for events greater than 1 in 50 years.
- On site surface water drainage will be discharged via proposed soakaway system designed to BRE365 requirements and Building Regulations approval.
- Floor levels will be raised above existing ground level with flood resilient measures already incorporated into the holiday park development. A Flood Management Plan already exists.
- Land Drainage Byelaw Consent will be required from the Upwell IDB for any development within 9.00m of the adjoining IDB main drain.

7 Summary and Conclusion

This application seeks to obtain full permission for the extension of the holiday park located at Lode Hall with the inclusion of one of the proposed lodges being allocated as wardens' accommodation, enabling year-round occupation.

The proposal will provide an important boost to a small local business as well as to the tourism economy of the region. Offering a wider range of services that includes having someone onsite to not only welcome guest and visitors alike but be on call for any such reason.

Planning policies particularly at a national level provide scope for tourist and leisure related development to achieve social and economic benefits, subject to appropriate controls. In this case, the holiday park is already in existence and the proposal will provide additional tourism development and growth within the rural economy.

The proposed development will not result in harm to the form and character of the area and is therefore in accordance with the provisions of the Local Plan and all other material considerations.

Taking into consideration all of the information provided within this statement it is considered that the development should receive the full support of Kings Lynn and West Norfolk Borough Council, as the local decision-making authority.