
Appeal Decision

Hearing held on 1 November 2022

Site visit made on 7 November 2022

by Graham Chamberlain BA (Hons) MSc MRTPI

an Inspector appointed by the Secretary of State

Decision date: 16 November 2022

Appeal Ref: APP/F3545/W/22/3301432

All Saints Hotel, The Street, Fornham St Genevieve, Suffolk IP28 6JQ

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Mr David Harris against the decision of West Suffolk Council.
 - The application Ref DC/21/1142/FUL, dated 21 May 2021, was refused by notice dated 4 February 2022.
 - The development proposed is described as 'change of use of part of golf course for the siting of 15 caravan lodge holiday homes and associated infrastructure'.
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Decision

1. The appeal is allowed and planning permission is granted for the change of use of part of golf course for the siting of 15 caravan lodge holiday homes and associated infrastructure at All Saints Hotel, Fornham St Genevieve, Suffolk IP28 6JQ in accordance with the terms of the application, Ref DC/21/1142/FUL, dated 21 May 2021, subject to the conditions in the attached schedule.

Preliminary Matters

2. An application for an award of costs was made by Mr David Harris against West Suffolk Council. This application will be the subject of a separate Decision. I have taken the description of development from the appeal form as it is more accurate than that on the application form given alterations to the proposal.
3. Amended drawings were submitted with the appeal. These show several updates aimed at improving the consistency of the submissions following changes that were made during the Council's assessment of the planning application. I have considered the amended plans because the alterations are minor and therefore no one would be prejudiced from me doing so. A footpath link between the appeal site and the Lark Valley Path was removed from the drawings submitted with the appeal. The appellant subsequently requested its reinstatement. No party would be prejudiced by me considering this feature as it has already been assessed at the application stage.

Main Issue

4. The main issue in this appeal is the effect of the proposed development on the character and appearance of the area

Reasons

5. The appeal site encompasses part of a golf course defined in the Suffolk Landscape Character Assessment (SLCA) as forming part of the Valley

Meadowlands Landscape Character Type (LCT). The key characteristics of this LCT are summarised in the SLCA as a flat valley floor that is generally unsettled and in arable production or grazed with areas of grassland divided by a network of wet ditches and occasional carr woodland.

6. The golf course exhibits some of these characteristics as it encompasses flat valley floor grassland. Nevertheless, the Golf Course, including the appeal site, has a noticeably manicured appearance and therefore it is not riverside meadowland in the conventional sense. This diminishes the appeal site's contribution to the landscape character of the LCT. That said, the Golf Course has an attractive parkland quality due to the presence of feature trees, open views and a meandering river. As a result, it has some semblance of a rural character. Accordingly, the Golf Course is an attractive area of semi-rural, 'green', and open land between Bury St Edmunds and Fornham All Saints and Fornham St Genevieve. In this respect it is important to the settings of these settlements as a green gap between them. This is the case despite it not being a high-quality example of the Valley Meadowlands LCT.
7. A recent urban extension has been constructed to the west of the appeal site. This has increased the sense of built development around the golf course. The properties at Marham Park tend to be large, tall and densely arranged. Moreover, they are not softened by landscaping in views from the A1101 to the same extent as the Northern Way Industrial Estate, which is set back behind a buffer of structural landscaping in the form of mature trees. Thus, the presence of the large Marham Park development means the function of the golf course as a rural buffer, albeit undesignated, is of greater significance to the setting of both Bury St Edmunds and the Fornhams. The contribution is more marked for the latter due to their smaller size.
8. The appeal site is currently open (free from built form), softly landscaped and well defined as separate from the adjoining Lark Valley Business Park. This is particularly apparent in views from the A1101, where there is a break in development between the properties in Pigeon Lane and the industrial units to the southeast. As a result, the appeal site contributes positively to the green buffer between settlements.
9. Although not structures, the lodges would have a built character and consequently they would not be features that in isolation would preserve the landscape character of the Valley Meadowland LCT. However, the lodges would be spaciouly arranged with generous levels of planting around and between them. This would result, over time, in the site having the appearance of a small wood. In this respect, the proposal would integrate with the character of the wider landscape, which includes pockets of woodland.
10. Moreover, the extensive use of planting would maintain a soft transition between the adjoining business park and golf course. In so doing, the edge of the town would continue to be well defined. The landscaping would enclose existing open views looking towards the river, but it would also provide texture, colour and an opportunity to remove incongruous evergreen planting over time. Overall, the effect on the character of the LCT would be neutral.
11. The lodges would be set back some way from the A1101 and therefore they would not appear prominent in views from Mildenhall Road looking towards the hotel. This would preserve an open aspect over the golf course between Pidgeon Lane and the appeal site. As a result, there would be no coalescence

of settlements as there would still be a perception of leaving Bury St Edmunds and entering the Fornhams. In this respect there would be no conflict with Objective 4 of the Rural Vision 2031 because the individual identity and distinctiveness of the Fornhams would still be readily apparent.

12. Moreover, the appeal scheme would be set away from the Lark Valley Way and Pidgeon Lane. From these directions the proposal would be softened by existing and proposed planting. The latter would become effective reasonably quickly due to the low height of the lodges and the use of hedges and shrubs alongside tree planting. As a result, there would only be glimpsed views of the lodges from these directions and therefore no sense of coalescence from public footpaths. Nor would there be a stark or prominent urbanising effect either. A point aided by the dark colour of the lodges, careful consideration of external lighting and the absence of fencing and parking between lodges.
13. Nevertheless, the appeal scheme would have a visual presence in views from the public rights of way and would be noticeable in some close-range views from the A1101. In this respect, it would be possible to perceive that the scheme has encroached into the green buffer between settlements provided by the golf course. This would not result in actual coalescence, but there would be a sense that the green buffer had been diluted, albeit slightly. That said, the scheme would occupy only a modest part of the golf course/buffer and would be reasonably tight to the adjoining business park. This, taken with the landscape mitigation, means it would only have a minor adverse impact on the buffer and would only slightly erode the sense of separation between Bury St Edmunds and the Fornhams. Accordingly, there would be a residual minor adverse impact arising from the appeal scheme.
14. The Council has referred to comments from its Landscape Consultant which suggest there would be a significant detrimental impact. 'Significant' in this context is given its ordinary meaning rather than the technical meaning used for the purposes of a landscape and visual impact assessment. Notwithstanding this, the Council confirmed at the hearing that the comments referred to in its statement had been superseded by more positive remarks submitted after considering amendments to the proposal. As a result, the initial objections of the Council's Landscape Consultant are not determinative.
15. Policy DM13 of the Joint Development Management Policies (DMP)¹ states that development will be permitted where it will not have an unacceptable adverse impact on the character of the landscape or landscape features. I have found that the proposal would not have an adverse impact on the landscape character of the Valley Meadowland LCT, but it would have an adverse impact on the Golf Course's function as a green buffer between settlements, which can be regarded as a feature of the landscape that contributes to the setting of Bury St Edmunds and the Fornhams.
16. The policy needs to be read as a whole to determine whether this impact would be an unacceptably adverse one. In this respect, the policy states that where any harm will not significantly and demonstrably outweigh the benefits of the proposal, development will be permitted. For reasons I go into, the identified harm would not significantly and demonstrably outweigh the benefits and therefore a conflict with Policy DM13 would not occur. Similarly, given the absence of coalescence, the neutral impact on the character of the LCT and the

¹ Forest Heath and St Edmundsbury Local Plan Joint Development Management Policies Document February 2015

absence of a harmful impact on the settings of settlements taken as a whole, there would be no conflict with Policy CS4 of the CS².

17. However, Policy DM34 of the DMP is specifically concerned with overnight visitor accommodation and states that it will be permitted subject to criteria. Overnight accommodation seems to be defined in a closed list that includes holiday lodges and static caravans. Criteria (b) of Policy DM34 states that overnight holiday accommodation will be permitted provided there would be no adverse effect on the character and appearance of the area. Accordingly, the policy tolerates some effects, but not when they become adverse. The trigger point for this is a matter of judgment based on the nature of the proposal and its location. As I have found that there would be an adverse effect, albeit a minor one, there would be a conflict with Criteria (b).
18. In reaching this view I note that Policy DM34 includes a specific section on tourism development in rural areas. It states that such proposal should adhere to Criteria (a)-(c) as well as Criteria (d) and (e). Criteria (d) states that such development should have no significant adverse impact upon the character or appearance of the landscape and countryside. It is unclear what 'significant' means in this context – an impact of significance or an impact of significant magnitude. Either way, Criteria (d) applies in addition to Criteria (b). As Criteria (b) has been offended, albeit slightly, there is an overall conflict with Policy DM34.

Other Considerations

19. The appellant has provided an Economic Statement (ES) that suggests the proposal would create a total of 21 full time equivalent jobs and generate additional expenditure of around £1.4 million per annum. The calculations do not factor in indirect and induced employment to allow for a margin of error. This quantifiable information was not before the previous Inspector.
20. The Council conceded at the hearing that it has not reviewed the ES in any detail but indicated that the figures seemed plausible and had been reviewed positively by the Economic Development Officer. Nevertheless, I share the scepticism of interested parties that the appellant has not satisfactorily demonstrated the robustness of projecting job numbers with reference to visitor expenditure. This is because although the methodology derives from data published by Destination Research, it is unclear if extrapolating job numbers in this way is standard practice in the tourism industry.
21. As an alternative, the appellant has considered possible job creation at All Saints Hotel and has suggested that twelve full time equivalent jobs would be provided. As a comparable, the appellant is approaching job creation from the lodges on the same basis they would when providing additional hotel rooms. There is some logic to this given the inherent link between the lodges and the hotel and its leisure facilities. However, as the lodges would be self-catering units, I wonder whether a night manager, 3 housekeeping and 2 receptionist roles would be created. It was suggested in a previous scheme for 35 lodges that four additional jobs would be created. This was not based on a detailed economic appraisal but seems more credible.

² St Edmundsbury Core Strategy Local Development Framework December 2010

22. The expenditure of around £1.4m includes around £747K on the proposed accommodation, which the appellant suggests would be premium lodges. These figures are based on accommodation charges at Norfolk Woods Resort and Spa as a comparable, which also offers premium lodges. However, this may not be the best comparison as the premium lodges at Norfolk Woods include hot tubs, whereas those at the appeal scheme would not. That said, the appellant suggested at the hearing that the appeal site's location close to Bury St Edmunds, alongside the availability of onsite facilities, would command a premium despite the location adjacent to a business park. On balance, I find this to be reasonable proposition and therefore the annual expenditure would be a notable benefit.
23. It has been suggested by interested parties that there would be limited demand for the lodges and therefore an estimated occupancy level of around 64% would be high. However, the occupancy level was based on that of the hotel and therefore has some objective basis. There is a lodge site nearby where the owners are seeking to relax the holiday occupancy clause due to what they suggest are low levels of demand. That said, the Council are yet to determine this application and therefore the matter is unresolved. In any event, the evidence underpinning that application is not before me.
24. A large lodge site has been allocated near to the appeal site under Policy RV6 of the Rural Area Vision 2031. This could affect any residual demand for this type of accommodation. Nevertheless, the proposed lodges would be linked with the golf course and the facilities at the hotel and would therefore offer something different. The hotel is also in need of extra accommodation to support its role as a large functions' venue. Moreover, the Council's Economic Development Officer has suggested that demand research indicates a continued need for accommodation in and around Bury St Edmunds.
25. As a result, some of the economic benefits set out in the ES are reasonable, although I do not consider it has been robustly demonstrated that the scheme would create 21 jobs. Nevertheless, when working with a figure of around 4 jobs and about £1.4m in annual expenditure, I consider the economic benefits would be notable considering the modest size of the scheme and when judged in the context of Paragraph 84 of the National Planning Policy Framework. Added to this there would be moderate benefits from a biodiversity net gain of around 28%, albeit from a low baseline. The lodges would also be located to promote sustainable transport.
26. The appellant has also suggested that the appeal scheme is required to support the ongoing viability of the golf course as a business and recreational facility used by several organisations, including one that works with children teaching them how to play golf. This has been set out in a personal statement which is unchallenged by the Council. Nevertheless, I have afforded this matter only limited weight in the absence of an independent viability assessment that would have otherwise been helpful in demonstrating the point.

Other Matters

Development outside of a settlement boundary

27. The holiday lodges would be located outside the settlement boundary of Bury St Edmunds and would therefore be in the countryside. However, Policy DM5 of the DMP permits new tourism facilities in the countryside as a matter

of principle. As a result, the proposal is not at odds with the Council's spatial strategy. On the contrary, in locational terms the appeal scheme would be well placed when applying criteria (a) in Policy DM34 as the lodges would be connected with the existing facilities at All Saints Hotel, well related to a main urban area and readily accessible by public transport, walking and cycling. That said, for the reasons already given there would be an overall but limited conflict with Policy DM34.

Loss of recreational facilities

28. Policy DM42 of the DMP seeks to safeguard the provision of open space, sport or recreational facilities. In so doing it states that the loss of these facilities will not be allowed unless they are surplus to requirements or there is replacement provision of at least equivalent quantity and quality. The proposal would result in a small decrease in the size of the golf course. As it has not been demonstrated that this area is surplus to requirements it is necessary for the appellant to provide facilities of an equivalent quantity and quality. This would be achieved by reconfiguring Holes 14 and 15 at the golf course in the way proposed. As a result, the golf course would remain as a challenging and good quality 18-hole recreational facility.

Public safety

29. The revisions to Holes 14 and 15 have been designed by a professional golf course architect and with reference to industry standards prepared by the Professional Golfers Association. The centre line of the revised Hole 14 would be 60m from the lateral boundary with the adjoining business park. This would be sufficient to guard against sliced shots. The centre of the Green would be 30m from the edge of the lodge site and consequently there would be the potential for balls to land in the vicinity of holidaymakers if over hit, especially as the PGA standard is 40-60m. However, the hole would be a par three and therefore a sensible golfer would seek to drive the ball onto the green on their first shot. Given the short distance of the hole they would not strike the ball with their full power. It is therefore highly unlikely that a golf ball would be over hit by such an extent that it would land around the lodges. The risk to holidaymakers at the lodges in this respect would be minimal.
30. A proposed footpath would pass within the safety cone of Hole 14. This footpath would link the lodges with the Lark Valley Path and a circular route around the course. There is a risk users of the path could be hit by golf balls. However, golfers would have a good line of sight so would be able to see pedestrians. Moreover, the route would not be a public footpath, and therefore not intensively used. Signage could also be used to warn both golfers and walkers. These measures would be sufficient to maintain public safety.
31. Similarly, Hole 15 would be set away from the boundaries of the course by an adequate distance. However, the new footpath linking the lodge site to the hotel complex would also encroach into the safety cone applied around this hole. Nevertheless, the risk to users of the footpath can also be adequately mitigated with warning signage at the tee and along the path, and from providing golfers with a line of sight that would enable them to see users of the footpath when teeing off. Thus, the risk to pedestrians would be minimal.

Previous appeal decision - APP/F3545/W/20/3249902

32. A previous appeal relating to a proposal for thirty-five lodges was dismissed in 2020. I have carefully considered the Inspector's reasons for doing so. In that case, the Inspector was concerned that the proposal before him would introduce a significant urbanising form in the foreground of views from Mildenhall Road and that this would close the visual gap between existing development along Pidgeon Lane and the Lark Valley Business Park.
33. In addition, the previous scheme would result in the loss of several trees. Nevertheless, the proposal before me is for a much smaller scheme which would retain an open aspect over the golf course when looking northeast from Mildenhall Road. This gap would prevent coalescence between Bury St Edmunds and the development along Pidgeon Lane. The current proposal would also result in only minimal tree loss and mitigation would be in place to reduce the scheme's urbanising effect. As the two schemes are materially different, there is no inconsistency between my findings and the previous Inspector's.

The other concerns of interested parties

34. The appeal site is located sufficiently far enough away from existing dwellings to ensure there would be no harmful impact on the living conditions of nearby residents through noise and disturbance from the reasonable occupation of the lodges. The footpath linking the lodges with the hotel complex would pass close to the properties in Pidgeon Lane, but it would not be a public right of way and a condition has been recommended by the Council requiring the submission and approval of a site management plan aimed at minimising noise, disturbance and lighting.
35. The hotel has adequate levels of onsite parking and visitors to the lodges would have access to golf buggies. Accordingly, the proposal would not generate a demand for harmful levels of off-site parking. Substantive evidence is not before me to demonstrate the proposal would have a severe impact on the local road network, including the Tollgate junction. In this respect I note that the Local Highway Authority have not raised objections. In the circumstances, and based on the evidence before me, this independent expert view is of determinative weight in considering this matter. Similarly, substantive evidence is not before me to demonstrate the proposal would have a harmful impact on air quality. Given the size of the proposal and its position outside an air quality management zone, an adverse impact in this regard is unlikely.

The effect on heritage

36. The previous Inspector concluded that a scheme of thirty-five lodges closer to the nearby Scheduled Ancient Monument (SAM) would not be harmful. The appeal scheme before me is smaller, more generously landscaped and further away from the SAM. It is therefore logical to conclude that this smaller scheme would likewise preserve the setting of the SAM. For similar reasons the proposal would also preserve the setting of Fornham All Saints Conservation Area, which gains some significance from its rural setting and separateness from Bury St Edmunds.

Appropriate assessment

37. The appeal site is located outside the Recreational Zone of Influence placed around the Breckland Special Area of Conservation and the Waveney and Little

Ouse Valley Fens Special Area of Conservation. Therefore, I share the view expressed in the appellant's shadow Habitats Regulation Assessment, validated by Natural England³, that the scheme is unlikely to have an adverse effect on the integrity of these sites and can be 'screened out'.

38. The Breckland Special Protection Area (SPA) is designated on account of its importance to heathland breeding birds, which are the qualifying features. The conservation objectives of the SPA can be summarised as ensuring the site's integrity by maintaining or restoring the habitats and populations of the qualifying features.
39. The appeal site is located within a Recreational Zone of Influence placed around the SPA. There is no dispute between the parties that population growth resulting from new housing within this zone would likely result in an increase in the harmful recreational disturbance of birds. Accordingly, the proposal if left unmitigated would, in combination with other plans and projects, be likely to have a significant adverse effect on the SPA when following a precautionary approach. Hence, an appropriate assessment in accordance with the Habitat Regulations⁴ is required to consider the implications of the proposal on the SPA in view of the conservation objectives.
40. I have not been directed to any strategic level projects in place in West Suffolk which are aimed at mitigating the impact of recreational disturbance on the SPA. As a result, it is necessary to consider project specific mitigation measures. Accordingly, the proposal would incorporate a proposed 'figure of eight' walking route around the golf course and along a short section of the B1106. This would provide residents of the lodges with a reasonably long, varied and interesting walk that took in some semi natural scenery. The convenience and attractiveness of this route would divert users of the lodges from visiting the SPA, which would likely require a car journey. Dog walkers would find this especially useful. The provision of the walking route would be supported with signage, information boards and information sheets to encourage use of local footpath routes. It would be secured through a planning condition and provided prior to the occupation of the lodges. Natural England reviewed the package of mitigation and was content with the approach.
41. Moreover, visitors would likely choose to stay at the proposed lodges primarily to use the golf course and its associated leisure facilities. The proximity to Bury St Edmunds, including its leisure facilities and the Abbey Gardens, is a further factor that would draw visitors away from visiting the SPA. Thus, the risk of harmful recreational disturbance at the SPA would be mitigated. Accordingly, the proposal would not adversely affect the integrity of the SPA, the condition of which need not deteriorate because of the proposal.

Conditions

42. In the interests of minimising the impact on the character and appearance of the area it is necessary to require details of the external cladding of the lodges and external lighting. It is similarly necessary to secure the landscape mitigation and its retention and protection, including existing trees during construction. In the interests of certainty, it is necessary to impose a plans condition, to control the number of caravans and to ensure they meet the

³ In their comments dated 14 October 2022

⁴ See Regulation 63 Conservation of Habitats and Species Regulations 2017 (as amended).

relevant statutory definition. To protect highway safety, it is necessary to impose conditions requiring details of access, drainage, manoeuvring, surfacing, provision of bins/refuge collection and visibility.

43. To protect the living conditions of existing residents, it is necessary to secure a construction management plan and details of site management measures to minimise noise and disturbance. To protect and enhance biodiversity and prevent an adverse effect on the integrity of the Breckland SPA it is necessary to secure biodiversity mitigation and enhancement measures, including details of lighting and footpaths.
44. To protect future occupants, it is necessary to investigate, manage and mitigate any land contamination. To manage the risk from surface water flooding it is necessary to require the implementation of the flood risk strategy, provision of a verification report and flood management during construction. To protect as yet unknown archaeology, it is necessary to impose a condition requiring investigation.
45. To adhere to the spatial strategy in the development plan and secure economic benefits it is necessary to limit occupancy to holidaymakers staying for short periods. A period of three months in any one calendar year would make it more likely the caravans are regularly let to holiday makers and not occupied infrequently as second homes. This would also safeguard local infrastructure. In the interests of public safety and to ensure the quality of the golf course as a recreational asset is not diminished, it is necessary to secure the proposed alterations to the course.
46. I have included some pre-commencement conditions with the written agreement of the appellant because matters to be approved may affect the design and/or layout of the proposal or because the condition seeks to mitigate impacts arising during the construction phase.

Conclusion

47. A proposal should be determined in accordance with the development plan unless material considerations indicate otherwise. In this instance there would be a small level of harm to the character and appearance of the area due to the erosion of the Golf Course as an important green gap between settlements. This adverse impact is at odds with Policy DM34 taken as a whole and the development plan taken as whole. A conflict with the development plan is an important matter. Balanced against this the appeal scheme would generate some notable and quantifiable benefits. When these are taken cumulatively, they would outweigh the modest level of harm to the character and appearance of the area and the development plan conflict flowing from this. This is material consideration that suggests the proposal should be determined otherwise than in accordance with the development plan. Thus, the appeal is allowed.

Graham Chamberlain
INSPECTOR

APPEARANCES

FOR THE APPELLANT

Mr Richard Ground KC
Mr Phil Cobbold
Catherine Xavier
Jon Huckle
William Swann
David Harris
Joshua Harris
Steve Hall
Peter Plumb

Cornerstone Barristers
Phil Cobbold Planning
Guarda Landscape
Huckle Ecology
Swan Golf Designs Ltd
Appellant
All Saints Hotel
On behalf of All Saints Hotel
On behalf of All Saints Hotel

FOR THE LOCAL PLANNING AUTHORITY

Dave Beighton
Britta Heidecke
James Morris

Principal Planning Officer
Senior Planning Officer
Planning Officer

INTERESTED PARTIES

Mr Johnson
Mr Liam Jones
Ms Christine Jones
Ms Sayer
Ms Iannelli-Poham
Ms Helen Watson

DOCUMENTS SUBMITTED AFTER THE HEARING

1. Addendum to the Statement of Common Ground covering suggested planning conditions
2. Written confirmation from the Council, alongside a relevant extract, that the reference in the reason for refusal to Objective 4 of the Bury St Edmunds Vision should be Objective 4 of the Rural Vision.
3. Written request from the appellant that the proposal be considered on the basis that the footpath linking the proposed lodges with the Lark Valley Path, is secured by a planning condition.
4. Extract from *R (East Meon Forge and Cricket) v East Hampshire District DC & Ors*, provided by Mr L Jones

Schedule of Planning Conditions

1. The development hereby permitted shall be begun not later than three years from the date of this permission.
2. Subject to the other conditions hereby imposed, the development hereby permitted shall not be carried out except in accordance with the following approved plans: Site Location Plan 467 SL1 A, Block Plan 467 P1H, Layout with Pedestrian Routes 467 FP1 D, Soft Landscaping Proposals GUA-DR-L-001 REV P17, LVA 2213-GUA-DOC-L-001, Tree Survey and AIA 9511 REV B and 9511-D-AIA-REV B, Golf course Alteration Plan SUFF.806, Lodge Type Drawings 'The Lookout', 'Casa Di Lusso', 'Foresters Lodge' and 'The Glasshouse'.
3. Prior to the first occupation of the development hereby approved, details of the timber cladding to be used in the external finish of the lodges/caravans shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.
4. Prior to commencement of development, the following components to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the Local Planning Authority:
 - i) A site investigation scheme,
 - ii) The results of a site investigation based on i) and a detailed risk assessment, including a revised Conceptual Site Model (CSM),
 - iii) Based on the risk assessment in ii), if required, a remediation strategy giving full details of the remediation measures required and how they are to be undertaken. The strategy shall include a plan, providing details of how the remediation works shall be judged to be complete and arrangements for contingency actions.
5. Prior to the first occupation of the development hereby approved, a verification report demonstrating the completion of the works as set out in the remediation strategy, as required, shall have been submitted to and approved in writing by the Local Planning Authority.
6. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted a remediation strategy to the Local Planning Authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the Local Planning Authority. The remediation strategy shall be implemented as approved.
7. Prior to the first occupation of the development hereby approved, the flood risk assessment and strategy for the disposal of surface water produced by GH Bullard (Dated: May 2021, Ref: 195/2020/FRADS Rev P2) shall have been implemented as approved. The strategy shall thereafter be managed and maintained in accordance with the approved strategy.
8. Prior to commencement of development, details of a Construction Surface Water Management Plan (CSWMP), detailing how surface water and storm

water will be managed on the site during construction (including demolition and site clearance operations if applicable) shall have been submitted to and approved in writing by the local planning authority. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP shall include: method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include :-

- i. Temporary drainage systems
- ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses
- iii. Measures for managing any on or offsite flood risk associated with construction

9. Prior to first occupation of the development hereby approved, a surface water drainage verification report shall be submitted to the Local Planning Authority detailing and verifying that the surface water drainage system has been inspected and has been built and functions in accordance with the approved designs and drawings. The report shall include details of all SuDS components and piped networks, in an agreed form, for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.
10. All planting comprised in the approved details of landscaping (GUA-DR-L-001 REV. P13, 10 November 2021) shall be carried out in the first planting season following the commencement of the development (or within such extended period as may first be agreed in writing with the Local Planning Authority). Any planting removed, dying or becoming seriously damaged or diseased within five years of planting shall be replaced within the first available planting season thereafter with planting of similar size and species unless the Local Planning Authority gives written consent for any variation.
11. The development hereby approved shall be implemented in accordance with the details set out in the Tree Survey, AIA and Arb Method Statement Rev. 8815 and the trees to be retained as shown on the approved soft landscaping scheme GUA-DR-L-001 Revision P13 (received 10 Nov 2021) shall be protected during construction in accordance with BS 5837:2012 - Trees in relation to construction - Recommendations. The protective measures contained with the tree report shall be implemented prior to commencement of any development, site works or clearance in accordance with the approved details, and shall be maintained and retained until the development is completed. Within the root protection areas the existing ground level shall be neither raised nor lowered and no materials, temporary buildings, plant, machinery or surplus soil shall be placed or stored thereon. If any trenches for services are required within the fenced areas they shall be excavated and backfilled by hand and any tree roots encountered with a diameter of 25mm or more shall be left unsevered. Any trees shown to be retained removed, dying or becoming seriously damaged or diseased within five years of commencement shall be replaced within the first available planting season thereafter with a replaced with the same species tree unless the Local Planning Authority gives written consent for any variation. Any retained trees removed, dying or becoming seriously damaged or diseased within five years of commencement shall be replaced within the first available planting season thereafter with planting of similar size and species unless the Local Planning Authority gives written consent for any variation.

12. Prior to first occupation of the development hereby approved, all mitigation and enhancement measures and/or works shall be carried out in accordance with the details contained in the Ecological Impact Assessment report (Huckle Ecology, November 2020) and Ecological Update Letter (Huckle Ecology, July 2021).
13. Prior to the first occupation of the development hereby approved, a Biodiversity Enhancement and Management Strategy for protected and Priority species shall be submitted to and approved in writing by the local planning authority. The content of the Biodiversity Enhancement Strategy shall include the following:
 - a) Purpose and conservation objectives for the proposed enhancement measures;
 - b) detailed designs to achieve stated objectives;
 - c) locations of proposed enhancement measures by appropriate maps and plans;
 - d) persons responsible for implementing the enhancement measures;
 - e) details of initial aftercare and long-term maintenance (where relevant).The works shall be implemented in accordance with the approved details prior to occupation and shall be retained in that manner thereafter.
14. Prior to installation of any external lighting on the application site or along the linking foot paths a lighting design scheme shall be submitted to and approved in writing by the local planning authority. All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in the approved form. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.
15. The caravans hereby permitted shall only be occupied for holiday use and shall not be used for permanent residential accommodation. No letting shall exceed a period of three months and no lodge shall be occupied by any one individual for a period exceeding three months within a calendar year. The owners/operators shall maintain an up-to-date register of the names of all owners/occupiers of individual lodges on the site, and of their main home addresses, and shall make this information available at all reasonable times to the Local Planning Authority.
16. Prior to commencement of development, the implementation of a programme of archaeological work shall have been secured in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority. The scheme of investigation shall include an assessment of significance and research questions; and:
 - a. The programme and methodology of site investigation and recording.
 - b. The programme for post investigation assessment.
 - c. Provision to be made for analysis of the site investigation and recording.
 - d. Provision to be made for publication and dissemination of the analysis and records of the site investigation.
 - e. Provision to be made for archive deposition of the analysis and records of the site investigation.
 - f. Nomination of a competent person or persons/organisation to undertake

the works set out within the Written Scheme of Investigation.

g. Timetable for the site investigation to be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

- 17 There shall be no occupation of any of the caravans hereby approved until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under part 1 and the provision made for analysis, publication and dissemination of results and archive deposition.
- 18 Prior to commencement of development, details of the proposed access shall have been submitted to and approved in writing by the Local Planning Authority. Details shall include the alignment, radii, continuity of footway and cycleway, pedestrian and cycle access into the development, any alteration/s of the existing carriageway, widths, gradient, materials, visibility splays and position of any gates and will include a safety audit. The approved access shall be laid out and constructed in its entirety prior to any other part of the development taking place. Thereafter the access shall be retained in its approved form.
- 19 No development above ground shall take place until details have been submitted to and approved in writing by the Local Planning Authority showing the means to prevent the discharge of surface water from the development onto the highway. The approved scheme shall be carried out in its entirety before the access is first used and shall be retained thereafter in its approved form.
- 20 Prior to commencement of development, details of the internal road and footpaths, (including layout, levels, widths, gradients, surfacing, lighting and means of surface water drainage), shall have been submitted to and approved in writing by the Local Planning Authority. No caravan shall be occupied until the internal road and paths have been constructed in accordance with the approved details except with the written agreement of the Local Planning Authority.
- 21 Prior to the first occupation of the development hereby approved, a site management plan shall be submitted to and approved in by the Local Planning Authority which outlines "site rules" and how they will be implemented to ensure noise and anti-social behaviour are adequately controlled. This shall include details of the site barrier and how it will be operated. The development shall be implemented and operated in accordance with the site management plan.
- 22 Before the access is first used clear visibility at a height of 0.6 metres above the carriageway level shall be provided and thereafter permanently maintained in that area between the nearside edge of the metalled carriageway and a line 2.4 metres from the nearside edge of the metalled carriageway at the centre line of the access point and a distance of 120 metres in each direction along the edge of the metalled carriageway from the centre of the access. Notwithstanding the provisions of Part 2, Class A of the Town and Country Planning (General Permitted Development) Order

2015 as amended (or any Order revoking and re-enacting that Order) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the area of the visibility splays.

- 23 Before development above ground level commences, details of the areas to be provided for the loading, unloading, manoeuvring and parking of vehicles including secure cycle storage and electric vehicle charging points shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.
- 24 Prior to first occupation of the development hereby approved, the proposed access onto the A1101 shall be properly surfaced with a bound material for a minimum distance of 10 metres from the edge of the metalled carriageway, in accordance with details previously submitted to and approved in writing by the local planning authority.
- 25 Before development above ground level commences, details of the areas to be provided for storage, presentation and collection of Refuse/Recycling bins shall have been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.
- 26 Prior to first occupation of the development hereby approved, and notwithstanding the approved drawings, details of a footway link to All Saints Hotel as shown on drawing 467 FP1 D and precise details of a footpath link to facilitate a circular walk around the golf course shall be submitted to and approved in writing by the LPA. The approved footway works shall be laid out and constructed in their entirety in accordance with the approved details prior to occupation of any of the caravans hereby approved. Thereafter the footway link shall be retained in its approved form.
- 27 Prior to first occupation of the development hereby approved, the detail/locations of the signage, information boards and detail of the information sheets aimed at promoting the use of local footpaths and leisure facilities, alongside a strategy and timetable for their provision, shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details.
28. No more than 15 caravans shall be sited on the site at any one time. Any caravan sited at the site shall fall within the definition of a caravan as set out in the Caravan Sites and Control of Development Act 1960 (as amended) and the Caravan Sites Act 1968. Unless already listed in Condition 2, no other caravan styles shall be stationed at the site without details having first been submitted to and approved in writing by the local Planning Authority.
29. Prior to first occupation of the development hereby approved, the golf course shall be remodelled in accordance with the details set out in the Golf Course Alterations Safety Report and Golf Course and Footpath Statement, unless alternative details/timeframes are otherwise approved in writing by the Local Planning Authority.