
Appeal Decision

by **Nick Davies BSc(Hons) BTP MRTPI**

an Inspector appointed by the Secretary of State

Decision date: 03 July 2020

Appeal Ref: APP/M9584/W/20/3246733

Unit 138, Omega Works, 4 Roach Road, London E3 2PA

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant approval required under Article 3, Schedule 2, Part 3, Class O of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).
 - The appeal is made by Mr Simon Roberts (Dlon Ltd) against the decision of London Legacy Development Corporation.
 - The application Ref 19/00360/PNCOU, dated 23 August 2019, was refused by notice dated 24 October 2019.
 - The development proposed is change of use from office to residential.
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Decision

1. The appeal is allowed and prior approval is deemed to be granted under the provisions of Article 3, Schedule 2, Part 3, Class O of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) for the change of use from office to residential at Unit 138, Omega Works, 4 Roach Road, London E3 2PA in accordance with the terms of the application Ref 19/00360/PNCOU, dated 23 August 2019, and the plans submitted with it (drawing nos. 19102-001, 100 and 101).

Procedural Matter

2. In response to travel restrictions currently in place due to the COVID-19 pandemic, I consider that this appeal can be determined without the need for a physical site visit. This is because I have been able to reach a decision based on the information already available. I have consulted the appellant and the local planning authority (the LPA) on this matter and neither has objected to the appeal proceeding on this basis.

Background and Main Issues

3. Schedule 2, Part 3, Class O of the Town and Country Planning (General Permitted Development) (England) Order 2015 (the GPDO) permits development consisting of a change of use of a building and any land within its curtilage from a use falling within Class B1(a) (offices) of the Schedule to the Use Classes Order, to a use falling within Class C3 (dwellinghouses). This is subject to a number of situations where such development is not permitted, which are listed under paragraph O.1.
4. One of the LPA's reasons for refusal was that the proposal did not comply with paragraph O.1, because the appeal premises was not in a B1(a) use on 29 May 2013. However, as part of the application, the appellant provided a statutory declaration confirming that the unit was in B1(a) use between 28 May 2012 and 20 April 2017. A letter from a previous employee, and a copy

of his employment contract, have also been submitted with the appeal. In view of this evidence, the LPA has confirmed that it no longer contests this issue. It is therefore common ground between the parties that the proposal would be permitted by Schedule 2, Part 3, Class O of the GPDO.

5. Development permitted by Class O is subject to the conditions in paragraph O.2(1). One of these conditions requires that, before beginning the development, the developer must apply to the LPA for a determination as to whether prior approval is required as to certain specified impacts. The LPA has identified contamination and flooding impacts as matters requiring prior approval, and has refused to grant such approval.
6. Paragraph W of the GPDO sets out the procedure for applications for prior approval under Schedule 2, Part 3. Paragraph W.(11)(c) says that development must not begin before the expiry of 56 days following the date on which the application was received by the LPA without the authority notifying the applicant as to whether prior approval is given or refused. The appellant claims that the 56 days had expired before the notification or refusal was issued.
7. Therefore, the main issues are:
 - a) Whether planning permission is deemed to have been granted by reason of the timing of the LPA's decision; and,
 - b) If planning permission is not deemed to have been granted, whether prior approval as to the contamination and flooding risks on the site should be granted under Paragraphs O.2 and W.

Reasons

Timing of the LPA's decision

8. The application for prior approval was submitted to the LPA by e-mail on 23 August 2019. The covering letter stated that the submission included the application form, together with plans indicating the site and showing the proposed development. The fee for the application was paid on 27 August 2019. The LPA's acknowledgement letter dated 12 September 2019 confirmed receipt of the fee and stated that, if a decision was not made by 21 October 2019, the applicant would have a right to appeal. The LPA's decision notice refusing the application was dated 24 October 2019.
9. These facts are not disputed by the LPA, but it is claimed that the application was, in fact, not valid until hard copies of the plans were received on 4 September 2019. This being the case, it is argued that the 56-day determination period would have expired on 29 October 2019, and that the date stated in the acknowledgement letter was a clerical error.
10. Paragraph W.(2) of the GPDO sets out the requirements for applications for prior approval, which should be accompanied by, amongst other things, a written description of the proposed development; a plan indicating the site and showing the proposed development; and any fee required to be paid. The paragraph does not define what is meant by a written description, or in what format the plans should be provided. However, paragraph W.(2)(d) requires that a notification application must be accompanied by the developer's email address if the developer is content to receive communications electronically. The GPDO therefore clearly contemplates that the process may be electronic.

11. Furthermore, Article 2 (6) to (11) of the GPDO sets out the requirements that should be met when electronic communication is used for the purpose of fulfilling any requirement in the Order to send any statement, notice or other document to a recipient. Paragraph (11) clarifies that references in the Order to plans, drawings, notices or other documents, include references to such documents in electronic form. The LPA has not alleged that the plans submitted electronically failed the accessibility, legibility or permanence requirements of paragraph (7). The notification submitted to the LPA on 23 August 2019 therefore met the requirements of Paragraph W.(2) except for the fee. Once the fee had been paid on 27 August 2019, the application was complete.
12. Article 7 and Paragraph W.(11)(c) of the GPDO both make it clear that the 56 days for determination start on the day following the date on which the application was received by the LPA. Therefore, the 56-day period commenced on 28 August 2019 and expired on 22 October 2019.
13. Paragraph W.9 of the GPDO states that the LPA may require the developer to submit such information as it may reasonably require in order to determine the application. In this case, the LPA considered that hard copies of the plans were necessary. However, applying the principles established in *Murrell v SSCLG [2010]*¹, the receipt of these plans on 4 September 2019 did not restart the 56-day determination period. The LPA's formal decision notice was therefore sent after the 56-day notification period expired. Consequently, the application for prior approval is deemed to have been granted, subject to the relevant statutory conditions.

Contamination and flooding risks

14. Given my findings above, it is not necessary for me to consider whether prior approval as to the contamination and flooding risks on the site should be granted.

Conditions

15. Paragraph O.2.(2) of the GPDO attaches a condition to this type of development, requiring its completion within a period of 3 years, starting from the prior approval date. A condition relating to the commencement of development is therefore not necessary. Paragraph W.(12) also requires that the development must be carried out in accordance with the details provided in the application. Paragraph W.(13) enables additional conditions to be attached to grants of prior approval. The LPA has suggested three additional conditions, but as planning permission is already deemed to have been granted without the need for prior approval, there is no means to attach additional conditions beyond the standard ones.

Conclusion

16. As notice was not served within the 56 days required under paragraph W.(11), planning permission is deemed to have been granted on 22 October 2019. I therefore conclude that the appeal should be allowed.

Nick Davies

INSPECTOR

¹ [2010] EWCA Civ 1367

**KING'S LYNN AND WEST NORFOLK BOROUGH COUNCIL
PLANNING OFFICER REPORT**

Parish:	Heacham
Proposal:	Notification for Prior Approval for change of use of agricultural building to a small hotel (C1) (Schedule 2, Part 3, Class R)
Location:	70 South Beach Road Heacham King's Lynn Norfolk PE31 7BB
Target Date:	8 June 2023

Decision: Prior Approval Refused

Relevant Planning History:

22/01878/PACU3 – Withdrawn - Notification for Prior Approval for change of use of agricultural building to a small hotel (C1) (Schedule 2, Part 3, Class
21/02027/PACU6 – Permitted - Notification for Prior Approval for change of use of agricultural building to a flexible use (Small Hotel (C1)) (Schedule 2, Part 3, Class R)
21/01444/LDE – Not Lawful - Certificate of Lawfulness: Use of part of the former grain store (agricultural) as camping showers and toilets
20/00543/PACU3 – Permitted - Prior notification for the proposed change of use from agricultural building to dwelling house
16/01494/PACU3 – Withdrawn - Change of use from agricultural building to dwelling house

The Application:

Prior Approval is sought for the change of use from an agricultural building to a hotel. No operational development is permitted by such an approval.

Change of use (without any operational development) from a building and any land within its curtilage from use as an agricultural building to a hotel (Class C1) is permitted by Class R of Part 3 of Schedule 2 of the General Permitted Development Order, 2017 as amended.

Such applications require the LPA to determine whether prior approval is required in relation to:

- (i) transport and highways impacts of the development
- (ii) noise impacts of the development
- (iii) contamination risks on the site and
- (iv) flooding risks on the site.

However, paragraph W of Part 3 makes it clear that if an application is to be refused on the basis that the proposed development does not comply with any conditions, limitations or restrictions specified in the relevant Part then these further considerations are not required

Site History:

22/01878/PACU3 – Withdrawn - Notification for Prior Approval for change of use of agricultural building to a small hotel (C1) (Schedule 2, Part 3, Class
21/02027/PACU6 – Refused - Notification for Prior Approval for change of use of agricultural building to a flexible use (Small Hotel (C1)) (Schedule 2, Part 3, Class R)
21/01444/LDE – Not Lawful - Certificate of Lawfulness: Use of part of the former grain store (agricultural) as camping showers and toilets
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16/01494/PACU3 – Withdrawn - Change of use from agricultural building to dwelling house

A previous PACU application for the building was recommended for refusal and ultimately withdrawn, on the basis that the proposal was considered to expose its occupants to the risk of rapid tidal inundation and therefore, the development was considered to be contrary to the NPPF and policies CS1, CS7, CS8 and DM21.

Prior to the submission of the PACU application, a Certificate of Lawfulness for an Existing Use was submitted. The application related to the change of use of part of the agricultural building to sui generis (former D2 use class, now Sui-Generis under the Amendments to the use classes order from the 1st August 2021) (assembly and leisure) incorporating a toilet and shower block for the users of the adjacent campsite.

This application was refused on the basis that the change of use of the building under class R did not comply with Class R Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) as no notification was given to the LPA of the intended change of use prior to the use changing and the use of the toilet and shower block by virtue of its curtilage and lack of association with the adjacent unlawful campsite (a Sui-Generis use), is considered to be a standalone toilet and shower block, a Sui-Generis use.

A site visit was carried out on the site by the Enforcement Team on 05/08/2022 where photographs were taken of the shower and toilets located within the agricultural building in question. A further site visit was undertaken on 14/04/2023. Photographs from this site visit show a kitchenette within the building and remains of the partially removed showers and toilets present.

Considerations:

R.1(a) requires the building to be used solely for an agricultural use as part of an established agricultural unit:

(i) on 3rd July 2012

(ii) in the case of a building which was in use before that date but was not in use on that date, when it was last in use, or

(iii) in the case of a building which was brought into use after 3rd July 2012, for a period of at least 10 years before the date development under Class R begins.

A Biodiversity and European Protected Species Survey dated 31st January 2012 has been submitted in support of the application to evidence that the building in question was solely used for agricultural purposes on 3rd July 2012. The report refers to the building as an agricultural barn and also shows photos of the building with agricultural machinery inside. Therefore, it is considered that sufficient evidence has been provided to prove that the building was in agricultural use on 3rd July 2012.

However, Paragraph R.4 states 'For the purposes of Class R, "flexible use" means use of any building or land for a use falling within the list of uses set out in Class R and change of use (in accordance with Class R) between any use in that list.'

As evidence by the refused Certificate of Lawfulness application (21/01444/LDE), an unlawful change of use has occurred within the building (part sui generis) from the date that the toilets and showers were installed.

The Enforcement Team have since visited the site and confirmed that the showers and toilets have only been partially removed in April 2023 (with some plumbing still connected, doors and cubicles still erected).

Whilst, part of the showers and toilets have been removed, a break in the agricultural use of the building has still occurred. This means that a new time period for an agricultural use starts again and therefore, the building has not been in a solely agricultural use for a period of 10 years prior before the development begins

Therefore, the proposal does not comply with requirements of Schedule 2, Part 3, Class R1.(a) (iii), of the Town and Country Planning (General Permitted Development) Order 2015 as amended.

(b) the cumulative floor space of buildings which have changed use under Class R within an established agricultural unit exceeds 500 square metres;
The cumulative floor space would be 269sqm which is within the criteria above.

(c) the site is, or forms part of, a military explosives storage area;
It is not part of a military explosives storage area

(d) the site is, or forms part of, a safety hazard area; or
It is not part of a safety hazard area

(e) the building is a listed building or a scheduled monument.
It is not a listed building or a scheduled monument

Further consideration is therefore not required in relation to whether prior approval is required in relation to:

- (i) transport and highways impacts of the development
- (ii) noise impacts of the development
- (iii) contamination risks on the site and
- (iv) flooding risks on the site.

Whilst not relevant given the development is not permitted development, it should be noted, given the proposed development is likely to have a significant effect on a number of European Sites, that any permission granted under prior approval would have been subject to the provisions of regulations 75 to 78 of the Conservation of Habitats and Species Regulations 2017.

Conclusion:

Whilst sufficient evidence has been provided to prove that the building in question was in agricultural use on 3rd July 2012, an unlawful change of use occurred at the time of installation for showers and toilets for use of the campsite. This resulted in a partially sui generis use and whilst, part of the showers and toilets have been removed and a break in the agricultural use of the building has still occurred. This means that a new time period for an agricultural use starts again and the building has not been in a solely agricultural use for a period of 10 years before the development begins.

Therefore, the proposal does not comply with requirements of Schedule 2, Part 3, Class R1.(a) (iii), of the Town and Country Planning (General Permitted Development) Order 2015 as amended.

Recommendation:

REFUSE - Prior Approval Refused

- 1 The building in question was host to an unlawful change of use through the installation of a shower and toilet block (sui generis use) as evidenced by the refusal of Certificate of Lawfulness 21/01444/LDE. As a result there has been a break within the lawful

agricultural use of the building. On this basis, a new time period for an agricultural use starts again and as the building has not been solely used for agriculture for a period of at least 10 years before the development under Class R begins, the proposal does not comply with the requirements of Schedule 2, Part 3, Class R1.(a) (iii), of the Town and Country Planning (General Permitted Development) Order 2015 as amended.

Signature: Case OfficerOlivia Luckhurst..... Date:08.06.2023.....

Recommendation Agreed **YES**

Signature(s): Principal Planning Officer Date:

Planning Control Manager, Environment and Planning

.....H Wood-Handy.....Date: ...8.6.23.....

CONTACT OFFICER: Olivia Luckhurst - Planner - 01553 616403

**KING'S LYNN AND WEST NORFOLK BOROUGH COUNCIL
PLANNING OFFICER REPORT**

Parish:	Heacham
Proposal:	Certificate of Lawfulness: Use of part of the former grain store (agricultural) as camping showers and toilets
Location:	70 South Beach Road Heacham King's Lynn Norfolk PE31 7BB
Target Date:	13 September 2021

RELEVANT POLICY FRAMEWORK

NEIGHBOURHOOD PLAN POLICIES

Neighbourhood Plan: Not Applicable

NATIONAL GUIDANCE

National Planning Policy Framework (NPPF)
Planning Practice Guidance (PPG)

Decision: NOT LAWFUL

Relevant Planning History:

Relevant to application site red line

21/00080/F: : - Change of use of agricultural land to provide access, parking and turning to adjacent holiday accommodation. Incorporating existing access track and highway access

Relevant adjacent site history

21/01296/F: Declined to Determine: 13/07/21 - Change of use from agricultural land to campsite

20/00523/F: Application Refused: 02/07/20 - Conversion of agricultural Building into 3 holiday Homes, 1 x Guest coffee lounge, 4 x games rooms, 1 x store room, 1 x staff rest room, addition of office/reception - Agricultural Buildings At Beach Farm S of 70 South Beach Road

20/00543/PACU3: Prior Approval - Refused: 12/06/20 - Prior notification for the proposed change of use from agricultural building to dwelling house

18/01969/F: Application Refused: 16/05/19 - Change of use from agricultural land to short stay non permanent camp site and erection of a proposed toilet block

19/01626/F: Application Permitted: 12/02/20 - Change of use from the agricultural building with one existing chemical toilet facility into a staff toilet for 6 or more staff working in agriculture

18/01920/F: Application Permitted: 09/01/19 - Installation of new timber fencing, including removal of vegetation and low level boundary wall -

16/01494/PACU3: Application Withdrawn: 20/09/16 - Change of use from agricultural building to dwelling house

12/00197/NMA_1: Non-determined Invalid now returned: 03/02/17 - NON-MATERIAL AMENDMENT TO PLANNING CONSENT 12/00197/F: Proposed change of use of existing agricultural buildings to holiday home use

12/00197/DISC_A: Discharge of Condition final letter: 31/07/14 - Discharge of condition 3 of planning permission 12/00197/F: Proposed change of use of existing agricultural buildings to holiday home use

14/00091/PREAPP: PreApp -Possible Approval with Amendment: 03/11/14 - Pre-application enquiry: Erection of 8 holiday lodges, formation of access road and associated facilities

12/00197/F: Application Permitted: 24/05/12 - Proposed change of use of existing agricultural buildings to holiday home use

Consultations:

Legal: For the purposes of the GPDO I do not believe that it matters whether the use of any adjoining planning units is lawful or not. The principal determining issue is whether the building was used solely for an agricultural use as part of an established agricultural unit on 3 July 2012. If so, then its use can change in accordance with the Class R criteria. Permission is only granted for the use to change, operational development will require its own planning permission.

The change of use of an agricultural building to a flexible commercial use is a standalone permission and does not have to be linked or associated with adjoining or ancillary use, whether lawful or otherwise. As I understand it, Mr Marsh does have some limited permitted development rights for recreational use that this change of use could support (noting my previous point about the need for planning permission for operational development).

There are a number of issues to consider

- * Is the shower/toilet block a D2 (Assembly and leisure) use
- * Was it in use, solely for agricultural use as part of an established agricultural unit on the 3rd July 2012
- * Is it currently an agricultural building, whether or not currently part of established agricultural unit – I do not see development prohibited if it ceased to be part of an established agricultural unit between July 2012 and today, but the Permitted development right is the change of use of an agricultural building
- * If it is not an agricultural building, what use is it in, bearing in mind a change of use under class r can change to another class r flexible use, subject to para R.3 restrictions?

Representations:

None received

Design Acceptable: NA

Impact on Neighbours Acceptable: NA

Other material impacts: NA

Specific comments or issues:

legislative processes

The applicant is trying to establish that through an LDE, a part change of use of an agricultural barn to a toilet and shower blocks in association with the adjacent campsite has benefited from class R of the general permitted development right.

R.1a Development is not permitted by Class R if—

(a) the building was not used solely for an agricultural use as part of an established agricultural unit—

(i) on 3rd July 2012;

(ii) in the case of a building which was in use before that date but was not in use on that date, when it was last in use, or

(iii) in the case of a building which was brought into use after 3rd July 2012, for a period of at least 10 years before the date development under Class R begins;

From site history of the agricultural unit, 12/00197/F, there is no dispute that the barns (to which this forms one of them) have been historically used for agricultural purposes in connection with an established agricultural unit on the 3rd July 2012.

b) the cumulative floor space of the building which has change use under class R within an established agricultural unit exceeds 500 sqm.

In this case the toilet and shower block is in part of a building, which in itself still constitutes a building under s.336 of the TCPA 1990, and is under 500 sqm.

c) the site is, or forms part of, a military explosive area

No it doesn't

d) the site is for forms part of a safety hazard area

No it doesn't

e) the building is listed or a scheduled ancient monument.

The building isn't listed or part of a scheduled ancient monument.

Paragraph R3 (1)(a) states that before changing the use of site under class R, and before any change of use to another use falling within one of the use classes comprising the flexible use, the development must:-

(a) Where the cumulative floor space of the building or buildings have changed use under Class R within an established agricultural unit does not exceed 150sqm, provide the following information to the local planning authority

(i) The date the site will begin to be used for any of the flexible uses,

(ii) The nature of the uses and

(iii) A plan indicating the site and the buildings that have changed use.

In this case no notification of the change of use was received by the authority to change part of the agricultural building before the change of use had occurred and class R does not allow for any operational development if the floor space is less than 150sqm.

Additionally the claimed campsite (former D2 use class, now Sui-Generis under the Amendments to the use classes order from the 1st August 2021) is not land which is closely associated with and serving the purposes of the agricultural building, or an area of land immediate beside or around the agricultural building no larger than the land area (whichever is the lesser). The proposal is relying on altering/extending the planning unit for which the D2 use (now sui-generis) is claimed. This Sui-generis campsite use is not considered to be lawful and is under separate enforcement investigation.

Even if the change of use had not occurred, and the building at the time of inspection had been used agriculturally, it is not associated with the campsite, and a standalone toilet and shower block is a Sui-Generis use, not the former D2 use class (Assembly and Leisure).

Other Matters:

In order to benefit from the provision of Schedule 2 of the GDPO, regulations 75-77 of the Conservation of Habitats and Species Regulations 2017 need to be considered.

s.75 of the Conservation of Habitats states that

“It is a condition of any planning permission granted by a general development order made on or after 30th November 2017, that development which—

- (a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and
 - (b) is not directly connected with or necessary to the management of the site,
- must not be begun until the developer has received written notification of the approval of the local planning authority under regulation 77 (approval of local planning authority).

To ascertain if there is likely to be a significant effect upon a European site, the Habitats Regulations Assessment requires the LPA to screen if there is a likely significant effect upon European Designated Sites (SAC and SPAS).

In this case, considering the indicative screening thresholds contained within the NPPG, development associated with campsites would need to be screened if the proposal is over 1ha. In this case the shower and toilet block for the LDE is less than 1ha. The cumulative impact when combined with the operations of the campsite, would not trigger the need to screen this proposal.

The LDE has been supported by an out-of-date ecology report referring to the other adjacent barns to the north that were subject to a 2012 permission. No reliance on this report can take place in accordance with Natural England Guidance that reports should be only valid for a period of 2 years.

Conclusion

An LDE cannot be granted for the toilet and shower block at 70 South Beach Road because;-

- * There was no notification prior to the change of use occurring in accordance with R.3-(1)(a)
- * The building (toilet and shower block or barn as a whole) was not being used for agricultural purposes at the time of the officer site visit.
- * The curtilage of the building does not extend to include the adjacent campsite.
- * The campsite is considered to be unlawful thus the development cannot benefit from any adjacent use class.

Recommendation:

Not Lawful

- 1 The change of use of the building under class R does not comply with Class R Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) as no notification was given to the LPA of the intended change of use prior to the use changing and the use of the toilet and shower block by virtue of its curtilage and lack of association with the adjacent unlawful campsite (a Sui-Generis use), is considered to be a standalone toilet and shower block, a Sui-Generis use. The development requires planning permission and certificate of lawfulness cannot therefore be issued.

Signature: Case Officer Date:

Recommendation Agreed **YES/NO**

Signature(s): Principal Planning Officer Date:

Planning Control Manager, Environment and Planning

..... Date:

CONTACT OFFICER: Mr C Fry - Senior Planner - 01553 616771

Appendix 4

Date: 12 May 2023
Our ref: 432567
Your ref: 23/00566/PACU6



Ms Olivia Luckhurst
Borough Council of King's Lynn & West Norfolk
planning.econsultation@west-norfolk.gov.uk

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

T 0300 060 3900

Dear Ms Luckhurst

Planning consultation: Notification for Prior Approval for change of use of agricultural building to a small hotel (C1) (Schedule 2, Part 3, Class R)

Location: 70 South Beach Road Heacham King's Lynn Norfolk PE31 7BB

Thank you for your consultation on the above dated 04 May 2023 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England note that this application is a re-submission of application ref. 22/01878/PACU3, and it is recommended that this response should be read in conjunction with our previous response for this application (our ref 414190, dated 14 December 2022).

Natural England's Opinion under Regulation 76

As submitted, the application could have potential significant effects on:

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

In addition to the European sites mentioned above, the application could have potential significant effects on the European sites designated within the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS) report.

Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.

The following information is required:

Further details on the foul water solution, including if it is reasonable for the proposal to connect to a mains sewer, and if not, whether an Environment Agency permit has been granted for the discharge of wastewater to surface water within 500m of the above designated sites.

An updated Habitats Regulations Assessment (HRA) considering the above and proceeding to appropriate assessment where relevant.

Additional recreational disturbance mitigation measures including the provision of a leaflet to all site visitors and permanent information boards indicating walking routes, details of designated sites and recreational pressures upon them and alternative visitor attractions.

Regulations 75-78 do not provide a power to impose conditions on the grant of regulation 76 approval, so if the appropriate assessment identifies necessary mitigation measures are needed to ascertain no adverse effect these would need to be secured by way of a planning obligation or some other form of binding legal agreement. However, this will be for the local planning authority to determine. Natural England would encourage the applicant to discuss this with the local planning authority as early as possible.

Without this information, Natural England may need to object to the proposal.

Please re-consult Natural England once this information has been obtained.

We have no comment to make on other prior approval matters included in the consultation.

We recommend that should your authority give its prior approval to the proposed permitted development, the following paragraphs are included on the decision notice as advisory notes;

Site of Special Scientific Interest

Should prior approval be given, and before a landowner commences a permitted development within a Site of Special Scientific Interest (SSSI), they must give written notice to Natural England and await its consent¹. See [here](#) for further details.

Should prior approval be given, and before a public body, statutory undertaker or other body commences a permitted development within or might affect a Site of Special Scientific Interest (SSSI), it must give written notice to Natural England and await its assent or, in some cases, its advice. See [here](#) for further details.

Protected Species

In addition to the advice in this letter, there may be impacts on protected species and a mitigation licence may be required from Natural England. Further information can be found here <https://www.gov.uk/guidance/wildlife-licences>

If you have any queries relating to the advice in this letter or if you wish to discuss the impacts on designated sites and scope for mitigation with Natural England, we can provide advice through our [Discretionary advice service](#).

Natural England's further advice on designated sites and advice on other issues is set out below.

NATURAL ENGLAND'S DETAILED ADVICE

Advice under the Conservation of Habitats & Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended)

Habitat Regulations Assessment (HRA)

Natural England notes that a shadow Habitats Regulations Assessment (SHRA) and Appropriate Assessment has been produced by the applicant, namely the "Supporting Evidence for Appropriate Assessment" document (SHRA) (Wild Frontier Ecology, dated February 2023).

The appropriate assessment concludes that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for any adverse effects, it is the advice of Natural England that **it is not**

¹ Because permitted development is not authorised by a planning permission granted following an application under Part III of the Town and Country Planning Act 1990, it is not a 'reasonable excuse' under section 28P(4) of the 1981 Wildlife and Countryside Act to carry out operations affecting a Site of Special Scientific Interest without giving prior notice to Natural England and without receiving its prior SSSI assent/consent/advice. Failure to do so is an offence.

possible to ascertain that the proposal will not result in adverse effects on the integrity of the sites in question.

Natural England advises that the assessment does not currently provide enough information or certainty to justify the assessment conclusion and that your authority should not grant planning permission at this stage. Further assessment and consideration of mitigation options is required, and Natural England provides the following advice on the additional assessment work required;

i) Water Quality Impacts

The applicant has proposed that the foul water from the proposal will be treated via an on-site Package Treatment Plant (PTP), namely a BioRock® 5000 PTP, before being discharged into the local drainage network and ultimately discharging into The Wash (Section 6.1.3).

Natural England advise that the applicant should provide evidence that it is not reasonable for the proposal to connect to the mains sewer network. [Discharges in sewered areas](#) provides further guidance on this.

If mains drainage is not possible and a PTP is the preferred foul water solution, the applicant will need to apply for an Environment Agency permit (if not done already), as discharges from the proposed PTP are within 500m of a SAC, SPA, Ramsar site and biological SSSI. Currently no evidence of this has been provided. Further information can be found on [General binding rules: small sewage discharge to a surface water - GOV.UK \(www.gov.uk\)](#)

Furthermore, it should be regarded that discharges within 500m of these European sites will be likely to have a significant effect. Currently, the SHRA screens out a likely significant effect from discharges at stage 1. Therefore we advise that the SHRA is updated to reflect this.

For further information, Natural England refers you to its guidance for discharges to the ground or surface water, provided as an annex to this response.

ii) Recreational Disturbance Impacts

The applicant has provided details on the potential for adverse effects on the above European sites within the SHRA (Section 7). Natural England recommend the following mitigation measures are required:

The applicant has provided clarification that a financial contribution will be paid into the Norfolk Green Infrastructure and Recreational Avoidance Mitigation Strategy (GIRAMS) (Section 9). As such, we advise your authority must secure this payment to ensure that this mitigation is delivered and the delivery of the GIRAMS remains viable. If this does not occur then the tariff in the adopted GIRAMS will need to be increased to ensure the GIRAMS is adequately funded.

In addition to the above, due to the proximity to designated sites, we advise that permanent information boards are installed within the proposal site, and a leaflet is produced for all visitors, detailing nearby public rights of way and alternative visitor attractions not in the proximity of designated sites, as well as, the details of nearby designated sites and recreational pressures upon them. The information boards and the leaflet should be provided to visitors for the lifetime of the development.

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 281 (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

Protected Species

Natural England note that the applicant has provided a Preliminary Ecological Appraisal (PEA) (Adonis Ecology, dated 22 August 2018). This report concludes that, "*With the impact avoidance measures of this report undertaken as outlined, it should be possible for the proposed developments to proceed with minimal risk of impact on protected or Section 41 wildlife or local nature*

conservation". It is best practice for an ecological appraisal over three years old to be updated (see CIEEM guidance on [Lifespan of Ecological Reports & Surveys](#)), therefore Natural England would recommend that a more recent PEA should be undertaken. This will ensure that if any new protected species are now present on the proposal site since August 2018, these will not be impacted. Further advice on protected species is included within Annex A.


Biodiversity Net Gain (BNG)

Under the Environment Act 2021, all planning permissions granted in England (with a few exemptions) will have to deliver at least 10% [BNG](#) from November 2023. BNG is an approach to development, and/or land management, that aims to leave the natural environment in a measurably better state than it was beforehand. Incorporating net gain into developments can bring greater access to doorstep nature, providing benefits for people alongside nature. BNG will be measured using Defra's biodiversity metric and habitats will need to be secured for at least 30 years.

Natural England would highlight that while the proposed development is not currently subject to deliver mandatory BNG, should the proposals extend post November 2023, it may be required to deliver BNG. Further guidance on Environmental Gains can be found in Annex A.

Other Advice

Further general advice on the protected species and other natural environment issues is provided at Annex A.

If you have any queries relating to the advice in this letter please contact me on 

Should the applicant wish to discuss the further information required and scope for mitigation with Natural England, we would be happy to provide advice through our [Discretionary Advice Service](#).

Please consult us again once the information requested above, has been provided.

Yours sincerely

Joe Thompsett
Lead Advisor – Norfolk and Suffolk Team

Annex A – Additional Advice

Natural England offers the following additional advice:

Landscape

Paragraph 174 of the [National Planning Policy Framework](#) (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Landscape Institute](#) Guidelines for Landscape and Visual Impact Assessment for further guidance.

Protected Species

Natural England has produced [standing advice](#)² to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 175 and 179 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and are included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found on [Gov.uk](#). Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

Ancient woodland, ancient and veteran trees

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 180 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forestry Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Environmental gains

Development should provide net gains for biodiversity in line with the NPPF paragraphs 174(d), 179 and 180. Development also provides opportunities to secure wider environmental gains, as outlined in the NPPF (paragraphs 8, 73, 104, 120, 174, 175 and 180). We advise you to follow the mitigation hierarchy as set out in paragraph 180 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

Restoring a neglected hedgerow.

² <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

Creating a new pond as an attractive feature on the site.
Planting trees characteristic to the local area to make a positive contribution to the local landscape.
Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
Incorporating swift boxes or bat boxes into the design of new buildings.
Designing lighting to encourage wildlife.
Adding a green roof to new buildings.

Natural England's [Biodiversity Metric 4.0](#) may be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. For small development sites the [Small Sites Metric](#) may be used. This is a simplified version of [Biodiversity Metric 4.0](#) and is designed for use where certain criteria are met.

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside [Biodiversity Metric 4.0](#) and is available as a beta test version.

Green Infrastructure

Natural England's [Green Infrastructure Framework](#) provides evidence-based advice and tools on how to design, deliver and manage green infrastructure (GI). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the [15 Green Infrastructure Principles](#). The Green Infrastructure Standards can be used to inform the quality, quantity and type of green infrastructure to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

GI mapping resources are available [here](#) and [here](#). These can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.

Rights of Way, Access land, Coastal access and National Trails

Paragraphs 100 and 174 of the NPPF highlight the importance of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the any nearby National Trails. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.

Biodiversity duty

Your authority has a [duty](#) to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available [here](#).

NATURAL ENGLAND'S LOCAL PLANNING CONSULTATION ADVICE FOR

DISCHARGES TO GROUND OR SURFACE WATER

Natural England's initial screening of this planning application suggests that impacts to designated sites caused by foul drainage arrangements need to be considered by your authority (i.e. the relevant Impact Risk Zone has been triggered).

The assessment of impacts from small sewage discharges (SSD) of up to 5 cubic metres per day may be assessed by following the process outlined below. We therefore advise you to review the planning application under consideration, and apply the following generic advice, as appropriate.

Please note that this advice only applies to development proposals within Essex, Hertfordshire, Cambridgeshire, Bedfordshire, Northants, Norfolk and Suffolk.

Most foul water is removed from a development site by a mains sewer. If a house or business is within 30m of a mains sewer, the expectation is that this will form the foul drainage arrangement. If a mains sewer connection is not proposed, and the property is more than 30m away from the nearest sewer your sewage may go to one of the following small sewage options:

- a septic tank - an underground tank which is part of a sewage treatment system where the solids sink to the bottom and the liquid flows out and soaks through the ground
- a small sewage treatment plant (also known as a package treatment plant) - a part mechanical system that treats the liquid so it's clean enough to go into a river or stream
- a cesspool (also called a cesspit) - a sealed tank that collects the sewage but without treatment, stores the waste and requires regular emptying by a tanker
- a non-standard system, e.g. a reed bed or a trench arch system

Please refer to the decision tree at Annex A to assesses whether the discharge needs an Environmental Permit and a Habitats Regulation Assessment or SSSI Assessment.

Is the discharge to surface water?

If the discharge is to surface water such as a ditch, stream or intertidal area discharges must preferably not be in or within 500m¹ of a Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar site, biological Site of Special Scientific Interest (SSSI), designated bathing water, or protected shellfish water; 200m of an aquatic local nature reserve; 50m of a chalk river or aquatic local wildlife site. If within this distance you will need to apply to the Environment Agency for a permit, and associated assessment work. Furthermore, within this distance it should be regarded as likely to have a significant effect to the European site (SPA, SAC, Ramsar), and further assessment work should be requested of the applicant, to inform your Habitats Regulations Assessment (see below), or consideration of the SSSI, as appropriate.

The sewage must only be domestic. The discharge must be less than 5 cubic metres per day in volume. The discharge must not cause pollution of surface water or groundwater. The sewage must receive treatment from a sewage treatment plant. New discharges must not be within 30m of a public foul sewer. Discharges must be made to a watercourse that normally has flow throughout the year and must not be made to an enclosed lake or pond.

¹ The distances specified in this section are taken to be the length of watercourse, not as the crow flies.

Is the discharge to ground water?

If the discharge is to ground water through a soakaway or drainage field then discharges must not be in, or within 50m of an SAC, SPA, Ramsar site, or biological SSSI, and must not be within an Ancient Woodland. If within this distance the applicant will need to apply to the Environment Agency for a permit. You can find out where ancient woodlands are on the [Magic website](#). If within this distance, it should also be regarded as likely to have a significant effect to the European site (SPA, SAC, Ramsar), and further assessment work should be requested of the applicant to inform your Habitats Regulations Assessment (see below), or consideration of the SSSI, as appropriate.

The discharge must be less than 2 cubic metres in volume. The sewage must only be domestic. The discharge must not cause pollution of surface water or groundwater. The sewage must receive treatment from a septic tank and infiltration system (drainage field) or a sewage treatment plant and infiltration system.

Is the proposed discharge close to a protected site?

Natural England has published a set of mapped Impact Risk Zones (IRZs) for SSSIs. This GIS tool can be used to help consider whether a proposed development is likely to affect a SSSI. Please see [Magic](#) and the IRZ [dataset](#) which includes user guidance.

If the discharge location is within or in close proximity to a Special Area of Conservation, Special Protection Area or Ramsar then it will be necessary for the applicant to provide sufficient information for you as the Competent Authority to conduct a Habitats Regulation Assessment in accordance with their duties under the Conservation of Habitats and Species Regulations 2017 (as amended) (the 'Habitats Regulations'). In considering the European site interest, Natural England advises that the competent authority under the provisions of the Habitats Regulations, should have regard for any potential impacts that a plan or project may have². The [Conservation objectives](#) for each European site explain how the site should be restored and/or maintained and may be helpful in assessing what, if any, potential impacts a plan or project may have.

Where foul water is discharged either to ground to clearly filter away from the site, or into a nearby watercourse to clearly flow away from the development its impact will not need to be assessed. If the treated water flows towards a Site of Special Scientific Interest (SSSI), the closer it discharges to the SSSI, the less time there is for it to be diluted before it reaches the site. Therefore, at greater distances from the SSSI, only those developments with a greater discharge volume are likely to have an impact. The sewage discharge thresholds are aligned with Environment Agency permitting.

What is the expected discharge volume?

It is necessary to ascertain whether the sewage discharge method proposed is appropriate and sufficient to handle the expected discharges throughout the year, including peak flows if use is occasional or seasonal. The expected discharge volume for proposed developments may be estimated using the daily discharge calculator for domestic properties which can be [found here](#).

As a general rule of thumb developments likely to fall below 5 cubic metres (5000 Litres) per day discharge include:

² Requirements are set out within regulations 63 and 64 of the Habitats Regulations, where a series of steps and tests are followed for plans or projects that could potentially affect a European site. The steps and tests set out within regulations 63 and 64 are commonly referred to as the 'Habitats Regulations Assessment' process.

In December 2012, Defra carried out a consultation on draft Core Guidance for developers, regulators & land/marine managers. This remains the most comprehensive guidance in relation to the implementation of the Habitats Regulations. This can be found on the Gov.uk website at the following page https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/82706/habitats-simplify-guide-draft-20121211.pdf

- Individual dwellings
- 5 homes of 4 bedroom or less
- 6 homes of 3 bedrooms or less
- 8 flats or small homes of 2 bedrooms or less

What information should be provided within the application for a HRA or SSSI assessment?

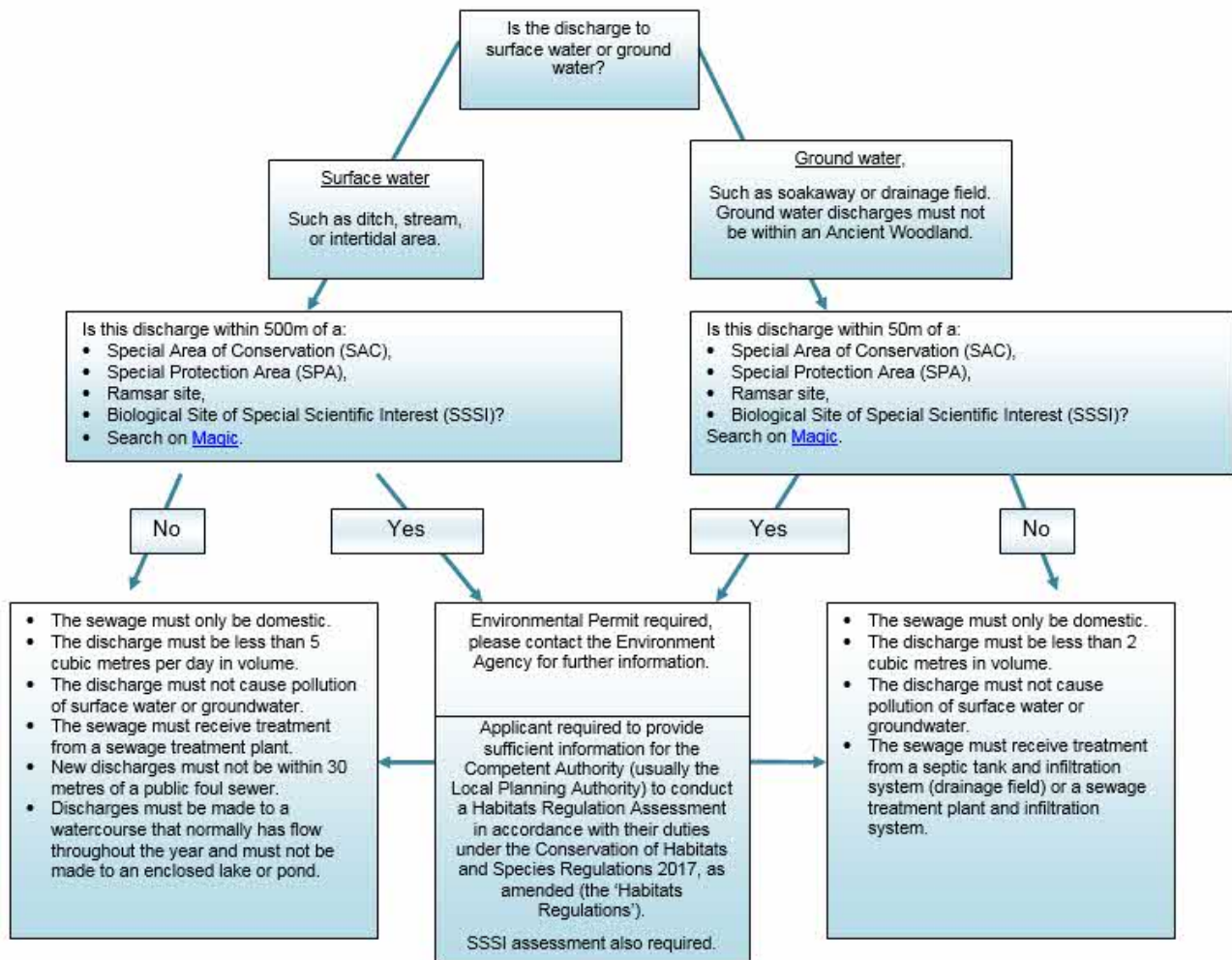
The information provided by the applicant should fulfil the requirements of the permits and general binding rules as outlined with Annex B and allow the Competent Authority to complete a HRA. For example:

- How the septic tank will work
- How often will the tank be serviced and emptied
- Will the tank have a bund around it
- Where is the tank/Where is the outfall
- Does the nearest watercourse flow all year
- If the tank overflows would it soak away to ground or to a ditch or direct to the river
- How deep is the water table
- Does the area regularly flood

Licensing

If a discharge does not meet the general binding rules as outlined in Annex A, then it will require a Small Sewage Discharges Permit from the Environment Agency. Applicants should consult the [GOV.UK](https://www.gov.uk) website to confirm whether their proposal will require a permit early in the development stage.

Annex A Decision Tree to assesses whether the discharge needs an Environmental Permit and a HRA or SSSI Assessment.



Annex B Septic tanks and treatment plants: permits and general binding rules

General binding rules for small sewage discharges (SSDs) came into effect from January 2015. The general binding rules consist of the conditions together with technical requirements specified by the Environment Agency in guidance to operators, compliance with which is part of the conditions. These will apply to anyone who has a septic tank or sewage treatment plant that makes a small sewage discharge, from January 2015. For further details please refer to www.gov.uk

The following general binding rules apply to all small sewage discharges are summarised below for your convenience.

Discharges to Surface Water	Discharges to Ground Water	General Binding Rule
	X	The discharge must be 2 cubic metres or less per day in volume.
X		The discharge must be 5 cubic metres or less per day in volume.
X	X	The sewage must only be domestic.
X	X	The discharge must not cause pollution of surface water or groundwater.
	X	The sewage must receive treatment from a septic tank and infiltration system (drainage field) or a sewage treatment plant and infiltration system.
X		The sewage must receive treatment from a sewage treatment plant.
	X	The discharge must not be within a groundwater Source Protection Zone 1 or within 50m from any well, spring or borehole that is used to supply water for domestic or food production purposes.
X		For discharges in tidal waters, the discharge outlet must be below the mean spring low water mark.
X	X	All works and equipment used for the treatment of sewage effluent and its discharge must comply with the relevant design and manufacturing standards i.e. the British Standard that was in force at the time of the installation, and guidance issued by the appropriate authority on the capacity and installation of the equipment.
X	X	The system must be installed and operated in accordance with the manufacturer's specification.
X	X	Maintenance must be undertaken by someone who is competent.
X	X	Waste sludge from the system must be safely disposed of by an authorised person.

X	X	If a property is sold, the operator must give the new operator a written notice stating that a small sewage discharge is being carried out, and giving a description of the waste water system and its maintenance requirements.
X	X	The operator must ensure the system is appropriately decommissioned where it ceases to be in operation so that there is no risk of pollutants or polluting matter entering groundwater, inland fresh waters or coastal waters.
X	X	New discharges must not be within 30 metres of a public foul sewer
X	X	For new discharges, the operator must ensure that the necessary planning and building control approvals for the treatment system are in place.
X		New discharges must not be in or within: 500m of a Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar site, biological Site of Special Scientific Interest (SSSI), designated bathing water, or protected shellfish water; 200m of an aquatic local nature reserve; 50m of a chalk river or aquatic local wildlife site. If within this distance you will need to apply to EA for a permit.
	X	New discharges must not be in, or within 50m of a Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar site, or biological Site of Special Scientific Interest (SSSI), and must not be in an Ancient Woodland. If within this distance you will need to apply to EA for a permit.
X		New discharges must be made to a watercourse that normally has flow throughout the year.
X		For new discharges, any partial drainage field must be installed within 10m of the bank side of the watercourse.
X		New discharges must not be made to an enclosed lake or pond.

Date: 14 December 2022
Our ref: 414190
Your ref: 22/01878/PACU3



Mrs. Osler
Borough Council of King's Lynn and West Norfolk
planning.econsultation@west-norfolk.gov.uk

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

T 0300 060 3900

Dear Mrs Osler.

Planning consultation: 22/01878/PACU3 - Notification for Prior Approval for change of use of agricultural building to a small hotel.

Location: Grain Store 70 South Beach Road Heacham King's Lynn Norfolk PE31 7BB

Thank you for your consultation on the above dated 30 November 2022 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England's Opinion under Regulation 76

Natural England considers that this development could have a likely significant effect on:

- The Wash and North Norfolk Coast Special Area of Conservation (SAC)
- The Wash Special Protection Area (SPA)
- The Wash Ramsar Site

Additionally to the European sites mentioned above, the application could also have potential significant effects on the European sites designated within the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS) report.

The application could also damage or destroy the interest features for which the underpinning Sites of Special Scientific Interest (SSSIs) of the above European sites have been notified.

Prior to development commencing, an application under Regulation 77 of the Conservation of Habitats and Species Regulations 2017 needs to be submitted to and approved by the LPA, in consultation with Natural England.

We require the following information to help determine whether the development is likely to have a significant effect on the above European Sites:

- A full Habitats Regulations Assessment (HRA) to determine the potential impacts of the plan or project both alone and in combination with other plans or projects.

In particular, we recommend you obtain the following information to help you undertake a Habitats Regulations Assessment:

- This development falls within the 'Zone of Influence' (Zol) for one or more of the European designated sites scoped into the Norfolk Green Infrastructure and Recreational disturbance Avoidance and Mitigation Strategy ('GIRAMS'). Natural England advise that a suitable contribution to the Norfolk GIRAMS should be sought from this development to ensure that the delivery of the GIRAMS remains viable.
- The impact of surface and foul water discharges on the above listed sites.

We recommend that should your authority give its prior approval to the proposed permitted development, the following paragraphs are included on the decision notice as advisory notes to the applicant;

Site of Special Scientific Interest

Should prior approval be given, and before a landowner commences a permitted development within a Site of Special Scientific Interest (SSSI), they must give written notice to Natural England and await its consent¹. See [here](#) for further details.

Should prior approval be given, and before a public body, statutory undertaker or other body commences a permitted development within or might affect a Site of Special Scientific Interest (SSSI), it must give written notice to Natural England and await its assent or, in some cases, its advice. See [here](#) for further details.

Protected Species

In addition to the advice in this letter, there may be impacts on protected species and a mitigation licence may be required from Natural England. Further information can be found here <https://www.gov.uk/guidance/wildlife-licences>

If you have any queries relating to the advice in this letter or if you wish to discuss the impacts on designated sites and scope for mitigation with Natural England, we can provide advice through our Discretionary Advice Service.

Natural England's further advice on designated sites and advice on other issues is set out below.

NATURAL ENGLAND'S DETAILED ADVICE

1) Advice under the Conservation of Habitats & Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended)

Additional Information required

Habitats Regulation Assessment (HRA)

Despite the proximity of the application to European Sites, the consultation documents provided do not include information to demonstrate that the requirements of regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) have been considered by your authority, i.e. the consultation does not include a Habitats Regulations Assessment.

It is Natural England's advice that the proposal is not directly connected with or necessary for the management of any European site. Your authority should therefore determine whether the proposal is likely to have a significant effect on any European site, proceeding to the Appropriate Assessment stage where significant effects cannot be ruled out. Natural England must be consulted on any

¹ Because permitted development is not authorised by a planning permission granted following an application under Part III of the Town and Country Planning Act 1990, it is not a 'reasonable excuse' under section 28P(4) of the 1981 Wildlife and Countryside Act to carry out operations affecting a Site of Special Scientific Interest without giving prior notice to Natural England and without receiving its prior SSSI assent/consent/advice. Failure to do so is an offence.

appropriate assessment your authority may decide to make.

Natural England advises that there is currently not enough information provided in the application to determine whether the likelihood of significant effects can be ruled out.

We recommend you obtain the following information to help you undertake a Habitats Regulations Assessment:

i) Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS)

This development falls within 1km the Wash and North Norfolk Coast SAC, the Wash SSSI, SPA and Ramsar, as well as falling in the 'Zone of Influence' (ZoI) for multiple other European designated sites scoped into the Norfolk Green Infrastructure and Recreational disturbance Avoidance and Mitigation Strategy ('GIRAMS'). It is anticipated that certain types of new development in this area is 'likely to have a significant effect' on the sensitive interest features of these European designated sites, through increased recreational pressure when considered either alone or 'in combination' with other plans and projects.

The GIRAMS has been put in place to ensure that additional recreational pressure does not lead to an adverse effect on European designated sites in Norfolk. The strategy allows effective mitigation to be implemented at a strategic level, so that the relevant councils, Natural England and other stakeholders are able to work together to provide the best outcomes for the designated sites. It also has the benefit of streamlining the process, so reducing the amount of time taken to process individual planning applications for the councils and Natural England.

Natural England worked collaboratively with all the relevant councils to develop the strategy. We support the aims of the strategy; in our view it is the best way to provide appropriate avoidance and mitigation measures for the European sites in question. If your authority determines that this development type should qualify, we advise that a suitable contribution to the Norfolk GIRAMS should be sought from this proposed development. This will ensure that the delivery of the GIRAMS remains viable. If this does not occur then the tariff in the adopted GIRAMS will need to be increased to ensure the GIRAMS is adequately funded.

Natural England's advice is that this proposed development, and the application of these measures to avoid or reduce the likely harmful effects from it, will need to be formally checked and confirmed by your Authority, as the competent authority, via an appropriate assessment in view of the [European Site's conservation objectives](#) and in accordance with the Conservation of Habitats & Species Regulations 2017 (as amended).

This is because Natural England notes that the 2018 [People Over Wind Ruling](#) by the Court of Justice of the European Union concluded that, when interpreting article 6(3) of the Habitats Directive, it is not appropriate when determining whether or not a plan or project is likely to have a significant effect on a site and requires an appropriate assessment, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site. The ruling also concluded that such measures can, however, be considered during an appropriate assessment to determine whether a plan or project will have an adverse effect on the integrity of the European site. Your Authority should have regard to this and may wish to seek its own legal advice to fully understand the implications of this ruling in this context.

Natural England advises that it is a matter for your Authority to decide whether an appropriate assessment of this proposal is necessary in light of this ruling. In accordance with the Conservation of Habitats & Species Regulations 2017 (as amended), Natural England must be consulted on any appropriate assessment your Authority may decide to make or the decision recorded as per an agreed approach.

ii) Water Quality Advice

Based on the application documents submitted, it is not currently clear how surface or foul water from the proposed development will be managed. Natural England would like clarity that both foul and surface water will be adequately controlled to prevent nutrient enrichment to nearby designated sites and therefore we are requesting further information with regard to this.

Please consult us again once the information requested above, has been provided.

Yours sincerely
Joe Thompsett

Sustainable Development – Norfolk and Suffolk

From: Suzanne Asher [redacted]
Sent: 19 May 2023 11:28
To: Olivia Luckhurst [redacted]
Cc: Nige [redacted] Natacha Osle [redacted]
Planning EConsultation <planning.econsultation@West-Norfolk.gov.uk>
Subject: 23/00566/PACU6 - Natural England comments

[External Email]
[Think before you click on links]

Dear Ms Luckhurst,

I note the comments received by Natural England. Please note as follows:

- A full HRA has been submitted with the application.
- A GIRAMS contribution has been made and confirmation of this was submitted with the application.

With regard to management of surface and foul water:

- Rainwater will follow the existing route. The proposal is for the development of an existing building so there will not be in any increase in rainwater.
- Foul water will be cleaned as shown in the HRA and will then join the watercourse. Solids will be removed by an appropriate courier and disposed of at an approved licensed disposal site run by Anglia.
- There is no mains sewer this far out of the village. A package treatment plant will be installed - this cannot be included within the red line so will need a planning application - this could be a condition of the Prior Approval.

I note that Natural England have asked that they be re-consulted with the above information, please can you let me know when this has taken place.

Kind regards,

Suzanne Asher
Asher Planning Ltd

[redacted]



A Guide to the Fees for Planning Applications in England

These fees apply from 17 January 2018 onwards (unless stated)

This document is based upon [‘The Town and Country Planning \(Fees for Applications, Deemed Applications, Requests and Site Visits\) \(England\) Regulations 2012’ \(as amended\)](#) including all amendments up to the 31 December 2022.

The fee should be paid at the time the application is submitted.

If you are unsure of the fee applicable, please [contact your Local Planning Authority](#).

Householder Applications		
Alterations/extensions to a single dwellinghouse , including works within boundary	Single dwellinghouse	£206

Outline Applications		
Site area	Not more than 2.5 hectares	£462 for each 0.1 hectare (or part thereof)
	More than 2.5 hectares	£11,432 + £138 for each additional 0.1 hectare (or part thereof) in excess of 2.5 hectares Maximum fee of £150,000

Full Applications (and First Submissions of Reserved Matters; or Technical Details Consent)		
Alterations/extensions to dwellinghouses , including works within boundaries	Single dwellinghouse (or single flat)	£206
	Two or more dwellinghouses (or two or more flats)	£407
New dwellinghouses	Not more than 50 dwellinghouses	£462 for each dwellinghouse
	More than 50 dwellinghouses	£22,859 + £138 for each additional dwellinghouse in excess of 50 Maximum fee of £300,000

Continued on next page...

Full Applications

(and First Submissions of Reserved Matters; or Technical Details Consent)
continued...

Erection of buildings (not dwellinghouses, agricultural, glasshouses, plant nor machinery)

Gross floor space to be created by the development	No increase in gross floor space or no more than 40 square metres	£234
	More than 40 square metres but no more than 75 square metres	£462
	More than 75 square metres but no more than 3,750 square metres	£462 for each 75 square metres (or part thereof)
	More than 3,750 square metres	£22,859 + £138 for each additional 75 square metres (or part thereof) in excess of 3,750 square metres Maximum fee of £300,000

The erection of buildings (on land used for agriculture for agricultural purposes)

Gross floor space to be created by the development	Not more than 465 square metres	£96
	More than 465 square metres but not more than 540 square metres	£462
	More than 540 square metres but not more than 4,215 square metres	£462 for first 540 square metres + £462 for each additional 75 square metres (or part thereof) in excess of 540 square metres
	More than 4,215 square metres	£22,859 + £138 for each additional 75 square metres (or part thereof) in excess of 4,215 square metres Maximum fee of £300,000

Continued on next page...

Full Applications (and First Submissions of Reserved Matters; or Technical Details Consent) continued...		
Erection of glasshouses (on land used for the purposes of agriculture)		
Gross floor space to be created by the development	Not more than 465 square metres	£96
	More than 465 square metres	£2,580
Erection/alterations/replacement of plant and machinery		
Site area	Not more than 5 hectares	£462 for each 0.1 hectare (or part thereof)
	More than 5 hectares	£22,859 + £138 for each additional 0.1 hectare (or part thereof) in excess of 5 hectares Maximum fee of £300,000
Applications other than Building Works		
Car parks, service roads or other accesses	For existing uses	£234
Waste (Use of land for disposal of refuse or waste materials or deposit of material remaining after extraction or storage of minerals)		
Site area	Not more than 15 hectares	£234 for each 0.1 hectare (or part thereof)
	More than 15 hectares	£34,934 + £138 for each additional 0.1 hectare (or part thereof) in excess of 15 hectares Maximum fee of £78,000
Operations connected with exploratory drilling for oil or natural gas		
Site area	Not more than 7.5 hectares	£508 for each 0.1 hectare (or part thereof)
	More than 7.5 hectares	£38,070 + £151 for each additional 0.1 hectare (or part thereof) in excess of 7.5 hectares. Maximum fee of £300,000

Continued on next page...

Full Applications

(and First Submissions of Reserved Matters; or Technical Details Consent)
continued...

Applications other than Building Works continued...

Operations (other than exploratory drilling) for the winning and working of oil or natural gas

Site area	Not more than 15 hectares	£257 for each 0.1 hectare (or part thereof)
	More than 15 hectares	£38,520 + additional £151 for each 0.1 hectare in excess of 15 hectares Maximum fee of £78,000

Other operations (winning and working of minerals) excluding oil and natural gas

Site area	Not more than 15 hectares	£234 for each 0.1 hectare (or part thereof)
	More than 15 hectares	£34,934 + additional £138 for each 0.1 hectare in excess of 15 hectares Maximum fee of £78,000

Other operations (not coming within any of the above categories)

Site area	Any site area	£234 for each 0.1 hectare (or part thereof) Maximum fee of £2,028
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Change of Use of a building to use as one or more separate dwellinghouses, or other cases

Number of dwellinghouses	Not more than 50 dwellinghouses	£462 for each dwellinghouse
	More than 50 dwellinghouses	£22,859 + £138 for each additional dwellinghouse in excess of 50 Maximum fee of £300,000

Other Changes of Use of a building or land

£462

Lawful Development Certificate

Existing use or operation	Same as Full
Existing use or operation - lawful not to comply with any condition or limitation	£234
Proposed use or operation	Half the normal planning fee.

Continued on next page...

Prior Approval (under Permitted Development rights)	
Larger Home Extensions (from 19 August 2019)	£96
Additional storeys on a home (from 30 July 2021)	£96
Agricultural and Forestry buildings & operations	£96
Demolition of buildings	£96
Communications (previously referred to as 'Telecommunications Code Systems Operators')	£462
Change of use from Commercial/Business/Service (Use Class E), or Betting Office or Pay Day Loan Shop to mixed use including up to two flats (Use Class C3) (from 1 August 2021)	£96
Change of Use of a building and any land within its curtilage from Commercial/Business/Service (Use Class E), Hotels (Use Class C1), Residential Institutions (Use Class C2), Secure Residential Institutions (Use Class C2A) to a State Funded School	£96
Change of Use of a building and any land within its curtilage from an Agricultural Building to a State-Funded School	£96
Change of Use of a building and any land within its curtilage from an Agricultural Building to a flexible commercial use within Commercial/Business/Service (Use Class E), Storage or Distribution (Use Class B8), or Hotels (Use Class C1)	£96
Change of Use of a building and any land within its curtilage from Commercial/Business/Service (Use Class E) to Dwellinghouses (Use Class C3) (from 30 July 2021)	£100 for each dwellinghouse
Change of Use of a building and any land within its curtilage from an Agricultural Building to Dwellinghouses (Use Class C3)	£96; or
	£206 if it includes building operations in connection with the change of use
Change of use of a building from Betting Office, Pay Day Loan Shop, Launderette; a mixed use combining one of these uses and use as Dwellinghouse(s); or Hot Food Takeaways to Dwellinghouses (Use Class C3)	£96; or
	£206 if it includes building operations in connection with the change of use
Change of Use of a building and any land within its curtilage from Amusement Arcades/Centres and Casinos to Dwellinghouses (Use Class C3)	£96; or
	£206 if it includes building operations in connection with the change of use

Continued on next page...

Prior Approval (under Permitted Development rights) continued...		
Change of Use of a building from Shops (Use Class A1), Financial and Professional Services (Use Class A2), Betting Offices, Pay Day Loan Shops and Casinos to Restaurants and Cafés (Use Class A3) (redundant from 1 August 2021)		£96; or
		£206 if it includes building operations in connection with the change of use
Change of Use of a building from Shops (Use Class A1) and Financial and Professional Services (Use Class A2), Betting Offices, Pay Day Loan Shops to Assembly and Leisure Uses (Use Class D2) (redundant from 1 August 2021)		£96
Change of Use from Shops (Use Class A1), Professional and Financial Services (Use Class A2), Takeaways (Use Class A5), Betting Offices, Pay Day Loan Shops or Launderettes to Offices (Use Class B1a) (redundant from 1 August 2021)		£96
Temporary Use of Buildings or Land for the Purpose of Commercial Film-Making and the Associated Temporary Structures, Works, Plant or Machinery required in Connection with that Use		£96
Provision of Temporary School Buildings on Vacant Commercial Land and the use of that land as a State-funded School for up to 3 Academic Years		£96
Development Consisting of the Erection or Construction of a Collection Facility within the Curtilage of a Shop		£96
Installation, Alteration or Replacement of other Solar Photovoltaics (PV) equipment on the Roofs of Non-domestic Buildings, up to a Capacity of 1 Megawatt		£96
Erection, extension, or alteration of a university building (from 21 April 2021)		£96
Movable structure within the curtilage of a historic visitor attraction, or listed pub/restaurant/etc (from 2 January 2022)		£96
Erection, extension or alteration on a closed defence site by or on behalf of the Crown of single living accommodation and/or non-residential buildings (from 11 January 2022)		£0 (no fee set)
Construction of new dwellinghouses (from 2 September 2020)	Not more than 50 dwellinghouses	£334 for each dwellinghouse
	More than 50 dwellinghouses	£16,525 + £100 for each dwellinghouse in excess of 50 Maximum fee of £300,000

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Reserved Matters

Approval of reserved matters following outline approval	Full fee due or if full fee already paid then £462 due
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Removal/Variation/Approval/Discharge of condition

Removal or variation of a condition following grant of planning permission		£234
Discharge of condition(s) – Approval of details and/or confirmation that one or more planning conditions have been complied with	Householder permissions	£34
	All other permissions	£116

Advertising

Relating to the business on the premises	£132
Advance signs which are not situated on or visible from the site, directing the public to a business	£132
Other advertisements	£462

Non-material Amendment Following a Grant of Planning Permission

Householder developments	£34
Any other development	£234

Permission in Principle

Site area	£402 for each 0.1 hectare (or part thereof)
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Concessions

Please note: Not all concessions are valid for all application types. Upon receipt of your application, the local authority will check the fee is correct and if the concession is applicable.

Exemptions from payment

An application solely for the alteration or extension of an existing dwellinghouse; or works in the curtilage of an existing dwellinghouse (other than the erection of a dwellinghouse) for the purpose of providing:

- Means of access to or within it for a disabled person who is resident in it, or is proposing to take up residence in it; or
- Facilities designed to secure that person's greater safety, health or comfort.

An application solely for the carrying out of the operations for the purpose of providing a means of access for disabled persons to or within a building or premises to which members of the public are admitted.

Listed Building Consent

Planning permission for relevant demolition in a Conservation Area

Works to Trees covered by a Tree Preservation Order or in a Conservation Area
Hedgerow Removal

If the application is the first revision of an application for development of the same character or description on the same site by the same applicant:

- For a withdrawn application: Within 12 months of the date the application was received
- For a determined application: Within 12 months of the date the application was granted, refused or an appeal dismissed
- For an application where an appeal was made on the grounds of non-determination: Within 12 months of the period when the giving of notice of a decision on the earlier valid application expired

If the application relates to an alternate use of buildings or land within the same Use Class that requires planning permission only by the requirements of a condition imposed on a permission granted or deemed to be granted under Part 3 of the Town and Country Planning Act 1990 (as amended).

If the application is for a lawful development certificate, for existing use, where an application for planning permission for the same development would be exempt from the need to pay a planning fee under any other planning fee regulation

If the application is for consent to display an advertisement following either a withdrawal of an earlier application (before notice of decision was issued) or where the application is made following refusal of consent for display of an advertisement, and where the application is made by or on behalf of the same person

If the application is for consent to display an advertisement which results from a direction under Regulation 7 of the 2007 Regulations, dis-applying deemed consent under Regulation 6 to the advertisement in question

Continued on next page...

Concessions continued...

Please note: Not all concessions are valid for all application types. Upon receipt of your application, the local authority will check the fee is correct and if the concession is applicable.

Exemptions from payment continued...

If the application relates to a condition or conditions on an application for Listed Building Consent or planning permission for relevant demolition in a Conservation Area

If the application is for a Certificate of Lawfulness of Proposed Works to a listed building

If an application for planning permission (for which a fee is payable) being made by the same applicant on the same date for the same site, buildings or land as the prior approval application (for larger home extensions, additional storeys on a home, or change of uses)

Reductions to payments

If the application is being made on behalf of a non-profit making sports club for works for playing fields not involving buildings then the fee is £462

If the application is being made on behalf of a parish or community council then the fee is 50%

If the application is an alternative proposal being submitted on the same site by the same applicant on the same day, where this application is of lesser cost then the fee is 50%

In respect of reserved matters you must pay a sum equal to or greater than what would be payable at current rates for approval of all the reserved matters. If this amount has already been paid then the fee is £462

If the application is for a Lawful Development Certificate for a Proposed use or development, then the fee is 50%

If two or more applications are submitted for different proposals on the same day and relating to the same site then you must pay the fee for the highest fee plus half sum of the others

Fees for cross boundary applications

Where an application crosses one or more local or district planning authorities.

- The amount due is usually 150% of the 'single' fee that would have been payable for the proposed development (as if there had only been one application to a single authority covering the entire site); unless
- The 'total' fee (the sum total of each separately calculated fee for each part of the development within each authority's boundary) is smaller. In which case this 'total' fee is the fee due

In either case, the fee should be paid to the authority that contains the larger part of the application site within its boundary.

ENDS

Appendix 6

Your ref:
Our ref: 23/00566/PACU6
Please ask for: Mrs Lesley Raby
Direct dial: 01553 616818
E-mail: borough.planning@west-norfolk.gov.uk

Borough Council of
**King's Lynn &
West Norfolk**



Mr Nigel Marsh
c/o Asher Planning Ltd
Ms Suzanne Asher
2 De Grey Close
Lewes
BN7 2JR

Geoff Hall
Executive Director

Stuart Ashworth
Assistant Director Environment and Planning

27 March 2023

Dear Sir or Madam

TOWN AND COUNTRY PLANNING ACT 1990

Details: **Notification for Prior Approval for change of use of agricultural building to a small hotel (C1) (Schedule 2, Part 3, Class R) at 70 South Beach Road Heacham King's Lynn Norfolk PE31 7BB**

I have received a planning application as detailed above but cannot process it until I receive some more information:

1. The application fee is £206.00. A further £110.00 is payable. You are not able claim a resubmission for the type of application as it is a prior notification. Re-submission only applies to planning applications.
2. Provide a transport and highways impact report
3. Provide a noise assessment report.
4. This site is within the Tidal flood risk area and the access is within flood zones 2 and 3. Provide a full flood risk assessment.
Screen shot of flood zones sent by email separately.

Once this information is received your application will become valid and the application can be passed to the relevant planning officer.

To enable us to deal with the additional information requested efficiently could you please ensure you quote the Application Number detailed at the top of this letter along with the name of the officer detailed on this letter. Could you also clearly state the location and details of the proposed development in all correspondence and **mark it for the attention of Mrs Lesley Raby**

Yours faithfully

A handwritten signature in black ink, appearing to read 'S. Ashworth'.

Executive Director
Environment and Planning

King's Court, Chapel Street, King's Lynn, Norfolk PE30 1EX
Tel: (01553) 616200
DX 57825 KING'S LYNN

Chief Executive – **Lorraine Gore**



Nigel <nigelmarsh999@gmail.com>

Your payment for planning application PP-12013268v1 has processed successfully.

1 message

noreply-payments@planningportal.co.uk <noreply-payments@planningportal.co.uk>

22 March 2023 at 12:21

To: Borough.planning@west-norfolk.gov.uk

Cc: suzanne@asherplanning.com, nigelmarsh999@gmail.com

Payment received

Dear Nigel Marsh,

Thank you for your payment for application PP-12013268v1. The details of your payment are shown below.

The payment was made online using a credit or debit card and processed on 22/03/2023 12:21:02.

The application and fee will now be submitted to Borough Council of King's Lynn and West Norfolk.

To discuss your application please contact Borough Council of King's Lynn and West Norfolk directly as the Planning Portal is not involved in the decision-making process. You can find the contact details for your Local Authority by using our [local authority search](#).

Payment details

VAT number:	GB 207 4030 52
Company name:	PortalPlanQuest Limited
Company address:	Suite 4C, Spectrum Building, Bond Street, Bristol BS1 3LG
Date and time:	22/03/2023 12:21:02
Description of service:	Payment for planning application service.
PP reference:	PP12013268v1GXP
Site Address	70, South Beach Road, Heacham, PE31 7BB
Applicant Name:	Nigel Marsh
Applicant Email Address:	nigelmarsh999@gmail.com
Application fee:	£96.00
Service charge (excluding VAT):	£26.83
Service charge VAT @ 20%:	£5.37
Total (including VAT):	£128.20
Transaction number:	16794876896908144
Registered Office:	Quayside Tower, 252-260 Broad St, Birmingham B1 2HF
Registered in the United Kingdom No :	04653583

If a refund is required at any point, please contact Borough Council of King's Lynn and West Norfolk who will initiate the process with us.

Please do not reply to this email as the mailbox is not monitored.

For answers to common questions, please [browse our FAQs](#).

Kind regards,

Planning Portal Team

The Planning Portal is an online application service provided by PortalPlanQuest and supports the submission of planning application information to Local Planning Authorities in accordance with statutory regulations.

PortalPlanQuest Limited (reg. no 09400439) is a joint venture between the Ministry of Housing Communities & Local Government (MHCLG) and TerraQuest Solutions Limited.



N Marsh
72 South Beach Road
PE31 7BB

Kings Court

Kings Court

Receipt

Transaction Date: 13/04/2023 16:42:21

Operator: PL011

Machine: PL011

Account Details

CAN	Reference	Payment of	Transaction Amt	VAT Amt	Rate
00323	606018524	MISC - Miscellaneous Payments	£110.00	£0.00	0%
Development Control/Planning Fees 23/00566/PACU6					

Payment Details

MOP	Payment Ref	Payment Amt
24 - Debit Cards		£110.00

APACS Payment Details

**** Customer Copy ****

Sale PLEASE DEBIT MY ACCOUNT

Transaction Type: Telephone Order (Keyed)

Date / Time: 13/04/2023 16:42:21

Auth Code: 353968

Card Number: *****3129

Ref: 7LPL011339

Card Type: MCDB

MID: ***09135

TID: ****2715

Card Amount: **£110.00**

Please keep this copy for your records

Total Amt Paid: **£110.00**

VAT Number: 106932087