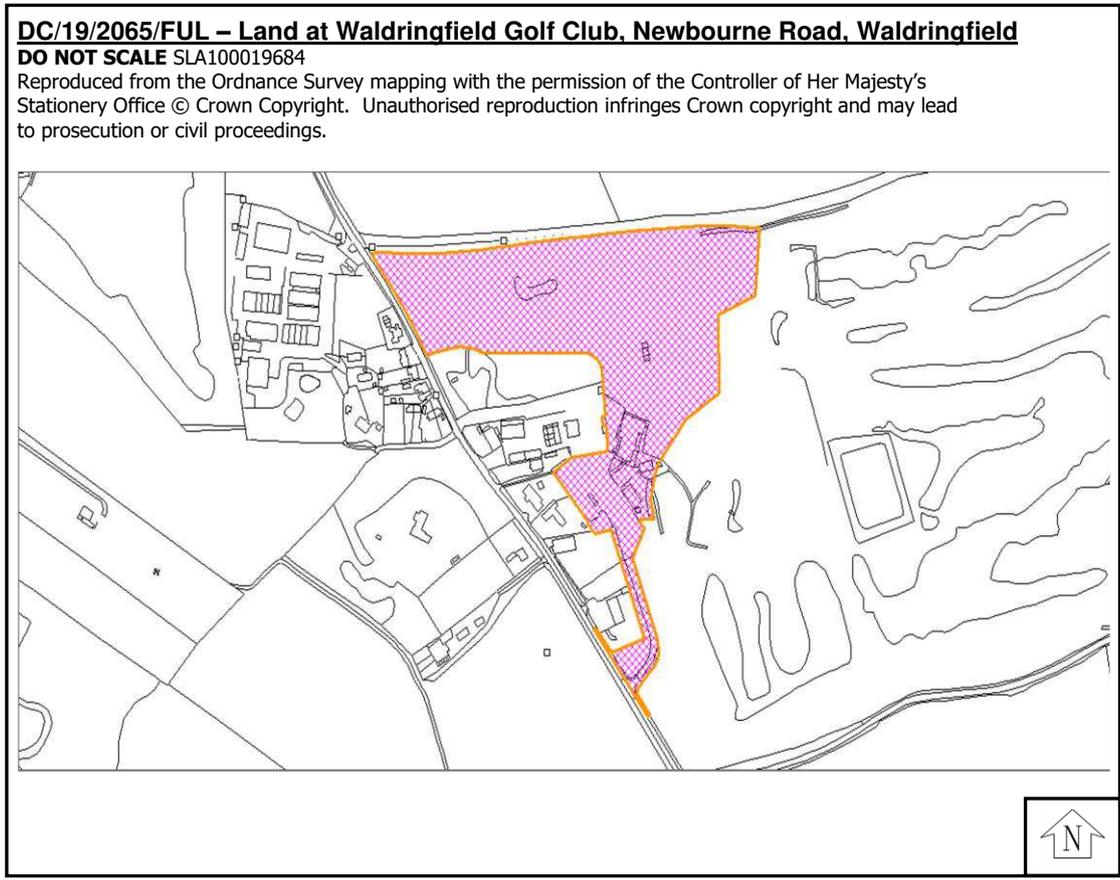


**PLANNING COMMITTEE SOUTH – 24 SEPTEMBER 2019**

**APPLICATION** DC/19/2065/FUL  
**EXPIRY DATE** 10 September 2019  
**APPLICATION TYPE** Small Scale Major Development  
**APPLICANT** Mr Matt Bartram (Heritage Developments Ltd)  
**ADDRESS** Land at Waldringfield Golf Club, Newbourne Road, Waldringfield, IP12 4PT  
**PROPOSAL** Re-development of golf course practice area for holiday / tourist accommodation, including swimming pool building, landscaping and access; and retention of the existing Golf Club House and its associated car park.

**CASE OFFICER** Natalie Webb  
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## **1. EXECUTIVE SUMMARY**

- 1.1. Planning permission is sought for the re-development of the golf course practice area for up to 58 holiday chalets, the erection of a new swimming pool building, landscaping and access. The existing clubhouse and its associated car park are to be retained.
- 1.2. Whilst the proposal seeks the regeneration of the site and the opportunities for tourism are noted, Officers consider that the principle of development does not accord with Local Plan Policies for Tourism or Development in Rural areas (SP8 & SP7). Additionally the site proposed major development within an Area of Outstanding Natural Beauty (highest status of protection) and within close proximity to the Deben Estuary Special Protection Area and would be contrary to Paragraph 172 and 176 of the National Planning Policy Framework which seeks to resist development within these areas, other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest.
- 1.3. A number of objections were received from the public, in addition to holding objections from the Highways Authority and Local Lead Flood Authority. There is also insufficient information in respect of noise and ecology to fully assess the proposal, however due to the in-principle objections further information was not sought in this instance.
- 1.4. Sport England comments are 'supportive' of the proposal, primarily in respect of the addition of the swimming pool; however, their concluding comment is that they raise 'no objection' to the proposal. Whilst the additional facilities are considered a benefit, they are outweighed by the harm to the adjacent designated sites. As such the application is recommended for refusal.

## **2. SITE DESCRIPTION**

- 2.1. The application site comprises of approximately 5.16 hectares of land located to the east of Newbourne Road, to the west of Waldringfield. The site lies within an Area of Outstanding Natural Beauty. The site is predominately triangular in shape. The southern part of the site comprises the car parking areas and access roads serving the existing Golf Club and the Clubhouse. The proposed holiday accommodation will be situated in the north and western portions of the site.
- 2.2. A small number of residential properties are located to the south of the adjoining Chapel Works commercial/industrial site, and to the west of the existing golf club, on both sides of Newbourne Road. Together these are referred to as the hamlet of Waldringfield Heath.
- 2.3. The site, whilst located outside the physical settlement limits as defined by Local Plan Policy SP19, is located within an area of mixed character, of industrial, business and tourism facilities; however the site is still considered to be within the countryside (Local Plan Policy SP29) for the purposes of planning.
- 2.4. The Brett Aggregates and Gravel supplier is situated on land to the west (between the site and Adastral Park). Seven Acres Business Park is located to the north of the site, separated by an agricultural field. The Brightwell Lakes development is located adjacent to the west of site, but remains separated from the golf course by landscaping and Newbourne Road.

- 2.5. There are existing holiday parks within the vicinity of the site, known as Low Farm Cottages and Campsite, which is to the east of the existing golf course and the Moon and Sixpence Holiday Park to the north-west.
- 2.6. There is an extensive planning history for the site, with most applications relating to the clubhouse or layout of the golf course. A small area of the application site, overlaps land subject to a recently permitted scheme to redevelop the Golf Course (application reference: DC/17/0494/FUL). This area of the site is intended to only consist of landscape and associated habitat improvements to tie the Golf Course redevelopment and holiday accommodation together.
- 2.7. An Environmental Impact Assessment (EIA) Screening Opinion was requested at the end of 2018 where Officers considered the site to require an EIA. A copy of the Assessment has been submitted with this application.
- 2.8. The development includes the provision of 58 single-storey, contemporary holiday chalets, providing a mix of one and two bedroom accommodation in addition to a small indoor swimming pool, additional landscaping, the retention of the existing Golf Clubhouse and associated car park. Access for the holiday units will be from the existing Golf Club access from Newbourne Road.
- 2.9. An application for 25 no. dwellings on the Chapel Works site, adjacent to the golf course was submitted alongside this application (reference: DC/19/2064/FUL) but was withdrawn on the 27<sup>th</sup> August 2019 following Officers feedback that the proposal would not be supported.

### **3. PROPOSAL**

- 3.1. The application seeks to redevelop the golf course practice area for up to 58 holiday/tourist units. The accommodation is relatively contemporary in design and is located to the north of the existing clubhouse (which is to be retained). Each of the units has their own parking provision of one space per unit.
- 3.2. Access to the units would be from an extension of carriageway off the existing access/parking area.
- 3.3. The proposed single-storey swimming pool building is to be located to the south of the existing clubhouse, to the east of the car park and has the potential to be accessible by tourists, club members and local residents.
- 3.4. The tree and scrub boundary to the north are to be retained, with additional native hedging proposed adjacent to Chapel Works site. The northern boundary of the site is to be enhanced with native hedging and scrub and there is an area of lowland heath proposed to the eastern border with the golf course which is intended to provide biodiversity benefit. Ornamental planting is proposed within the car parking area.

## 4. CONSULTATIONS/COMMENTS

### Parish/Town Council (Multiple Parish Responses)

#### 4.1. Waldringfield Parish Council:

*“Recommends Refusal. In summary, it is clear that this application does not comply with the NPPF as referred to above, nor does it comply with the following SCDC/ESC policies and therefore should not be permitted:*

*- SP15 (Landscape and Townscape) which seeks to resist proposals which comprise poor design and layout or seriously detract from the character of their surroundings and quality of the Area of Outstanding Natural Beauty.*

*- It does not satisfy the requirements of SP19, SP29, DM3, and DM4 in relation to development within the countryside.*

*- It does not satisfy the requirements of SP27 as it is outside and quite separate from the physical limits of the local service centre (Waldringfield).*

*- It does not satisfy the requirements of DM18 section (c) as the proposed chalets are of poor design and are within exposed parts of the AONB.”*

#### 4.2. Martlesham Parish Council

*“Martlesham Parish Council objects to this planning application on the following grounds:*

*The site is outside the physical limits of Waldringfield and therefore in the ‘countryside’. The development does not meet the requirements of Local Plan policy SP29 – the Countryside.*

*The proposed development would be in an Area of Outstanding Natural Beauty (AONB). This development cannot be assessed in isolation from the approved Adastral Park housing allocation of 2,000 dwellings and it is vital that cumulative effects are taken into account.*

*The eastern boundary of the Brightwell Lakes site has been drawn specifically to maintain a clear and significant separation between that development and the AONB in an effort to minimise its negative impact on the AONB. This scale of development within the AONB will erode that separation. The perimeter dog walking route will take people within 800m of the estuary.*

*The development would bring additional cars to the area with regular vehicular movements on and off site in order to access shopping & leisure facilities elsewhere. It would have a detrimental impact on the local highway network.*

*There is a lack of connectivity to the surrounding areas and therefore the application is contrary to paragraphs 32 and 35 of the NPPF.*

*The holiday chalets will be particularly attractive to walkers and dog walkers. The Deben SPA (Ramsar) site is within 1km which will be a strong draw for holiday makers. The provision of on-site dog walking facilities and improved areas of landscaping would be welcomed but the fact remains that the development will inevitably bring increased visitor*

*numbers to local sites of interest and an increase in disturbance to birds and wildlife. Due to the lack of connectivity holiday makers are also very likely to use the car to get to destinations in Waldringfield or neighbouring villages for walking.*

*It would contribute to coalescence, reducing the open spaces between the new development at Adastral Park and Waldringfield.*

*This planning application does not contribute towards the achievement of sustainable development as outlined in Section 2 of the NPPF nor does it accord with the Suffolk Coastal Local Plan & emerging Local Plan taken as a whole. There is no identifiable need for such a development in this location. There may be some economic benefit to be gained, but the development would not fulfil a social role reflecting the community's needs, or an environmental role – it would be to the detriment of the natural environment.”*

### **Statutory Consultees**

- 4.3. **Suffolk County Council (SCC) Highways** In summary, SCC as Local Highway Authority (LHA) is recommending a holding refusal until the issues outlined within their response are resolved and/or additional information supplied. SCC as LHA considers the location of the proposal remote from local amenities and considers that it does not benefit from sustainable links. As proposed, residents would be almost solely reliant on private motor vehicle travel which is not acceptable for a development of this scale.
- 4.4. **SCC Flood and Water Team** SCC Flood and Water Team as Local Lead Flood Authority (LLFA) raise a holding objection due to insufficient information in respect of: Submission of proposed ground levels; Multiple lodges look to be located in existing low points, including in the OS mapped pond; Assessment of proposed exceedance routes, including any potential impacts on the proposed new properties; Details regarding the OS mapped pond that is identified within the site boundary; Maintenance plan, including identifying an asset owner; An assessment of the clay layer found in some sections of the site. Whilst this is unlikely to affect the crate soakaways as the depth of these could be increased, it could affect the functionality of the permeable paving structures, and; Details of proposed surface water drainage for the proposed swimming pool building. Furthermore additional infiltration testing across the site will be required before construction can begin, given the cover of site investigation, the LLFA are happy with the consistency of sandy soils across the site and would therefore be willing to condition this aspect to be discharged prior to commencement of development.
- 4.5. **SCC Archaeology** The site has high archaeological potential, conditions requested for Written Scheme of Investigation pre-commencement and Post Investigation Assessment pre-occupation.
- 4.6. **East Suffolk Council (ESC) Head of Environmental Health:** Insufficient information in respect of Noise; A development such as this has the potential to cause nuisance particularly where facilities and events are laid on for residents. Areas that may need to be considered in terms of nuisance potential are the pool (and associated plant), amplified music on the site and whether any heating plant such as air source heat pumps will be used for the holiday units, the aforementioned items are not exhaustive and all potential sources of noise should be considered and their impact assessed to ensure no aspect of the sites use may cause nuisance to nearby sensitive residential properties in an area of

likely low background noise levels. A specific assessment of potential noise impact may also be useful for the planning department in assessing impact on local amenity. Conditions were also requested for the discovery of unexpected contamination.

### **Non Statutory Consultees**

4.7. Area of Outstanding Natural Beauty (AONB) Unit: The AONB team objects to the above application. It is acknowledged that the proposal includes opportunities to enhance this part of the AONB i.e. through new landscaping, footpath creation and the restoration of heathland. These are potential positive outcomes in landscape terms, however they alone do not outweigh potential harm to the AONB. Overall, the AONB Officer considers that the proposal would have a detrimental impact on the Natural Beauty on the western edge of the Suffolk Coast & Heaths AONB including reduced tranquillity, particularly when considered cumulatively with the Chapel Works proposal. Finally the proposal conflicts with a number of adopted Core Strategy & Development Management policies and AONB Management Plan objectives.

4.8. Sport England : From the submitted information it appears as though the proposals are part of a wider scheme to re-invest in the club, and to make it more attractive to the local demographic, and it appears that the club are fully involved, and supportive of, this project for the above reasons. Sport England are therefore supportive of this scheme as although it results in the loss of part of the golf club site, it is part of a wider scheme to re-invest in the club and make it more attractive to local users. In this respect, the overall intention is to enhance this facility, in line with Sport England Planning Policy Objective 2, which seeks to enhance the quality, accessibility and management of existing facilities.

The proposal will also deliver a 12.5m x 6m swimming pool as part of the new facility proposals, thus delivering an additional facility that will enable people to participate in sport and physical activity. In light of the above Sport England do not wish to object to this proposal.

4.9. Cadent Gas : Searches based on the proposal have identified that there is apparatus in the vicinity of the site which may be affected by the activities specified. Further information of any equipment to be sent to Cadent in the event that the application is supported.

4.10. Suffolk Fire and Rescue : Informative notes provided.

4.11 Third Party Representations : 20 letters of objection have been received (although some of these are multiple representations from the same property) raising the following material planning considerations:

- Cumulative Impact with Adastral Park (now known as Brightwell Lakes);
- Over-development;
- Scale of Development;
- Principle of Use;
- Setting of precedent;
- Traffic or Highways;
- Light Pollution;
- Noise Pollution;
- Inappropriate in AONB;

- Impact on Ecology/Biodiversity;
- Impact on SSSI;
- Development over holes 8 & 9 not practice area;
- Clubhouse is closed/ceased use;
- Loss of privacy to existing residential properties.

The above are summaries of the responses received. Full comments can be viewed on the Council's website.

## 5. PUBLICITY

5.1. The application has been subject of the following advertisement in the press:

Publication	Category	Date Published	Expiry Date
East Anglian Daily Times	Major Application May affect Archaeological Site Environmental Impact Assessment Contrary to Development Plan	20.06.2019	18.07.19
East Anglian Daily Times	Major Application May affect Archaeological Site	06.06.2019	27.06.19

## 6. SITE NOTICE

6.1. The following site notice(s) have been displayed at the site:

Site Notice Type	Reason	Date Posted	Expiry Date
General Site Notice	Major Application May affect Archaeological Site Environmental Impact Assessment Contrary to Development Plan	18.06.2019	09.07.19
General Site Notice	Major Application May affect Archaeological Site	04.06.2019	25.06.19

## 7. PLANNING POLICY

7.1. On 1 April 2019, East Suffolk Council was created by parliamentary order, covering the former districts of Suffolk Coastal District Council and Waveney District Council. The Local Government (Boundary Changes) Regulations 2018 (part 7) state that any plans, schemes, statements or strategies prepared by the predecessor council should be treated as if it had been prepared and, if so required, published by the successor council - therefore any policy documents listed below referring to "Suffolk Coastal District Council" continue to apply to East Suffolk Council until such time that a new document is published.

7.2. Section 38 of the Planning and Compulsory Purchase Act 2004 requires applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

7.3. The Suffolk Coastal District Local Plan - Core Strategy and Development Management Development Plan Document has been adopted and forms part of the Development Plan. It was adopted in July 2013. Upon its adoption a number of the policies within the pre-existing Suffolk Coastal Local Plan were 'Saved,' and others were superseded or abandoned.

7.4. The Development Plan for the District consists of:

- East Suffolk Council Suffolk Coastal District Local Plan – Core Strategy and Development Management Development Plan Document (Adopted July 2013),
- Suffolk Coastal Local Plan 2019 (Examination anticipated Summer 2019)
- East Suffolk Council Suffolk Coastal District Local Plan – Site Allocations and Site Specific Policies Development Plan Document (Adopted January 2017)
- The 'Saved' Policies of the Suffolk Coastal Local Plan incorporating the first and second alterations.

7.5. The relevant policies of the Suffolk Coastal District Local Plan – Core Strategy and Development Management Development Plan Document (Adopted July 2013) are:

SP1 – Sustainable Development  
SP1A – Presumption in Favour of Sustainable Development  
SP7 – Economic Development in Rural Areas  
SP8 – Tourism  
SP11 – Accessibility  
SP12 – Expansion and Intensification of Employment Sites  
SP14 - Biodiversity and Geodiversity  
SP15 – Landscape and Townscape  
SP17 – Touring Caravan, Camper Vans, Camping Sites  
SP19 – Settlement Policy  
SP29 - Countryside  
DM19 – Parking Standards  
DM21 – Design (Aesthetics)  
DM22 – Design (Function)  
DM23 – Residential Amenity  
DM24 – Sustainable Construction  
DM26 – Lighting  
DM27 – Biodiversity and Geodiversity  
DM28 – Flood Risk

7.6. The relevant policies of the East Suffolk Council Suffolk Coastal District Local Plan – Site Allocations and Site Specific Policies Development Plan Document are:

SSP2 – Physical Limits Boundaries

7.7. The new Local Plan (covering the former Suffolk Coastal area) was submitted to the Planning Inspectorate (PINS) for examination on Friday 29 March 2019, the Examination is taking place between 20<sup>th</sup> August and the 20<sup>th</sup> September 2019. Full details of the submission to PINS can be found through this link: [www.eastsuffolk.gov.uk/localplanexamination](http://www.eastsuffolk.gov.uk/localplanexamination) .

- 7.8. At this stage in the plan making process, the policies that received little objection (or no representations) can be given more weight in decision making if required, as outlined under Paragraph 48 of the National Planning Policy Framework (2019). The following policies are now considered to have some weight in determining applications; these have been referenced where applicable:

Policy SCLP4.11: Retail and Commercial Leisure in Martlesham

Policy SCLP6.1: Tourism

Policy SCLP12.6: Land at Sea Road, Felixstowe

Policy SCLP12.7: Port of Felixstowe

Policy SCLP12.12: Felixstowe Ferry Golf Club to Cobbolds Point

Policy SCLP12.13: Cobbolds Point to Spa Pavilion

Policy SCLP12.14: Spa Pavilion to Manor End

Policy SCLP12.15: Manor End to Landguard

Policy SCLP12.17: Tourism Accommodation in Felixstowe

Policy SCLP12.39: Land at Siverlace Green (former airfield) Parham

Policy SCLP12.40: Former airfield Parham

Policy SCLP12.42: Riverside Industrial Estate, Border Cot Lane, Wickham Market

Policy SCLP12.43: Land at East of Aldeburgh Road, Aldringham

Policy SCLP12.45: Land to the South East of Levington Lane, Bucklesham

Policy SCLP12.53: Land South of Ambleside, Main Road, Kelsale cum Carlton

Policy SCLP12.57: Land at Bridge Road, Levington

Policy SCLP12.59: Land adjacent to Swiss Farm, Otley

Policy SCLP12.72: Land at Street Farm, Witnesham

Appendix E – Key Elements of the Marketing Guidance

Appendix F – Criteria for identification of Non Designated Heritage Assets

Appendix G – Viability Requirements

Appendix H – Landscape Character Area Maps

Most of the above policies are existing site allocation policies from either the Site Allocations DPD or the Felixstowe Peninsula AAP, which do not directly impact the proposal. Modifications to the Local Plan following the Examination are awaited.

## **8. PLANNING CONSIDERATIONS**

### Principle of Development

- 8.1. Local Plan Policy SP1a confirms that when considering development proposals the Local Planning Authority will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.
- 8.2. Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. In this instance, the applicant sought pre-application advice where they were advised that the Principle of Development would not accord with

the Development Plan. In this instance, no amount of discussion would overcome the principle of development being unacceptable.

- 8.3. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:
- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
  - Specific policies in that Framework indicate that development should be restricted.
- 8.4. The Council has recently published the Housing Land Supply Statement (August 2019) which confirms that a five-year supply of housing land can be demonstrated, as follows:
- The statement confirms that the Suffolk Coastal Local Plan area of East Suffolk has a housing land supply of 7.03 years.
  - The statement confirms that the Waveney Local Plan area of East Suffolk has a housing land supply of 6.58 years.
- 8.5. Therefore, the application should be assessed in accordance with the adopted Core Strategy and Local Plan Policies and the National Planning Policy Framework (NPPF).
- 8.6. Paragraph 172 of the National Planning Policy Framework states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:
- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
  - b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
  - c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.
- 8.7. The proposed development would have some merit in providing a positive boost to local economy through increased tourism; however this is not outweighed by the harm caused to the SPA or AONB, in addition to impacts on ecology, local residents and the highways network. Local residents have suggested that the clubhouse has not been operational for sometime, therefore has limited contribution to local economy.
- 8.8. There is alternative tourist accommodation within close proximity to the site, including the Moon and Sixpence holiday park, as such it is considered that the need for tourism in this

area has been met and the current proposal is somewhat excessive, particularly as there are no units on site currently; there is additional concern that these units would remain unoccupied, as there is no evidence for their necessity.

- 8.9. As confirmed by the AONB Officer, the proposal would be considered to have a detrimental impact on the environment and the AONB landscape, where the recreational opportunities which are to be improved/provided are of no compensation for the harm. It is therefore considered that the application be contrary to Paragraph 172 of the NPPF.
- 8.10. Paragraph 176 of the NPPF further states that Special Protection Areas should be given the same protection as habitats sites. When determining planning applications, if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.
- 8.11. A small area of low-level heathland is proposed to the east of the site abutting the golf course. The existing site is open and whilst there are no formal habitat areas, the site provides natural habitat which will be lost through development. The proposed heathland would not overcome the harm to biodiversity and ecology of the existing undeveloped form of the site, however there is potential that the mitigation would encourage and enhance biodiversity and ecology if delivered well.
- 8.12. The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site, as confirmed by Paragraph 177 of the NPPF.
- 8.13. Whilst it is acknowledged that major development has been given outline consent on land adjacent to the site (Brightwell Lakes) this site was allocated within the Core Strategy for the development of up to 2,000 dwellings and is not within the AONB.
- 8.14. Central to the Core Strategy for the future of the former Suffolk Coastal district area, is the achievement of sustainable development. This proposal is contrary to sections B, D, E, G, I of Local Plan Policy SP1 as the development would inter-alia not be well related to services, transport and infrastructure by nature of being located within the Countryside; nor would it ensure the provision of the appropriate infrastructure in order to support existing and proposed communities; it involves the development of greenfield; the proposal would effectively increase the overall need to travel to and from the site daily and; would not create a sustainable community in a rural location.
- 8.15. Whilst Local Plan Policies DM7 (Economic Development in Rural Areas) and DM8 (Tourism) are broadly supportive of new tourism opportunities, Policy DM8 sets out the areas where development would be acceptable, the site is not within any of these areas and falls to the east of the A12, which is contrary to DM8(e) which states that development in the form of conversions, improvements/minor extensions to existing facilities and small scale new development in unexposed areas of the Suffolk Coast and Heaths AONB will be acceptable within sustainable locations where a landscape assessment shows these could be accommodated with no adverse impact. The use of the site as existing does not include holiday lets, as such this is not an expansion to an existing use, but the creation of a new use

on the site, which is at odds with Paragraph 172 of the NPPF and the aspirations of Policies SP7, SP8 and DM12.

- 8.16. Emerging Local Plan Policy SCLP6.3: Tourism Development within the AONB and Heritage Coast has very limited weight at this stage, as this policy is still subject to examination. This Policy confirms that tourism development in the AONB, or its setting and Heritage Coast will be supported where it:
- a) Enhances the long term sustainability of the area;
  - b) Is of an appropriate scale for its surroundings (10 pitches/units or fewer in relation to proposals for tourist accommodation);
  - c) Is well related to existing settlements and / or supporting facilities;
  - d) Avoids, prevents or mitigates for adverse impacts on the natural environment;
  - e) Supports the conservation and enhancement of the natural beauty and special qualities of the AONB and its setting;
  - f) Is of the highest design standards and where appropriate reuses existing buildings;
  - g) Promotes innovative, contemporary design in appropriate locations;
  - h) Minimises light pollution from artificial light sources and ensures the retention of dark skies;
  - i) Avoids locations sensitive to the exposed nature of the AONB and Heritage Coast; and
  - j) Demonstrates sustainable aspects of the development during construction and throughout the life of the development. Renewable energy provision is strongly encouraged.
- 8.17. The proposal is contrary to the aspirations of the emerging policy as the development is not of an appropriate scale for its surroundings; the proposal is seeking 58 units, where the emerging policy suggests all development should be of an appropriate scale, usually 10 units or less. The site is not well related to existing settlements or facilities, due to its countryside location and is situated on the gateway to the AONB.
- 8.18. Therefore, the principle of development is considered to be contrary to NPPF paragraph 172, 176, 177, Local Plan Policies, SP1, SP1a, SP7, SP8, DM12 and emerging policy SCLP6.3.

#### Design, Landscape, AONB, Ecology and RAMS

- 8.19. There are no in-principle objections to the design of the holiday units, however details of material finish would be a key consideration given the sensitive location of the site and to accord with Local Plan Policy DM21; had the principle of development been acceptable.
- 8.20. Whilst there would be limited views of the proposal from the streetscene (with additional landscaping) there would be glimpses through the site from the highway and public rights of way. Local Plan Policy SP15 seeks to protect and enhance the various landscape character areas within the district either through opportunities linked to development or through other strategies.
- 8.21. The site contains some features, especially existing tree cover, that are typical of the local prevailing landscape character although this is tempered by the current use of the site as a golf course. Overall, the site is considered to have a Medium/High susceptibility to specifically accommodate the proposed development.

- 8.22. The proposal requires existing key features, in this case existing mature trees, to be retained so that they can continue to contribute to prevailing landscape character. The existing tree survey has been surveyed and root protection areas identified. Provided that these areas can be properly protected during development, this conclusion of susceptibility would seem to be correct. Against this needs to be considered the magnitude of change that is likely to arise from the proposed development. The proposal would have a Moderate Adverse effect on landscape character, which would moderate to Slight Adverse once the proposed mitigation planting has established and is beginning to mature. Full details for the mitigation planting would be required and secured by condition.
- 8.23. A Landscape and Visual Impact Assessment (LVIA) has also been carried out for key viewpoints in the surrounding landscape and the sensitivity of the various visual receptors has also been considered. In this respect, walkers and then cyclists and horse riders are considered to have the highest degree of sensitivity to change in the prevailing view. In many cases, despite the highly sensitivity of the view, the anticipated effects are considered to be slight to negligible because of the distance to the site and/or existing boundary vegetation. Where effects are considered slight and adverse, it is considered that the proposed mitigation planting will moderate these effects over time to negligible.
- 8.24. Whilst East Suffolk's Landscape and Arboricultural Officer has not raised an objection subject to conditions on mitigation planting and material finish, the Area of Outstanding Natural Beauty Officer has raised an objection to the proposal.
- 8.25. It is acknowledged that the proposal includes opportunities to enhance this part of the AONB through new landscaping, footpath creation and the restoration of heathland; these are potential positive outcomes in landscape terms, however they alone do not outweigh potential harm to the AONB.
- 8.26. The AONB Officer considers that the proposal would have a detrimental impact on the Natural Beauty on the western edge of the Suffolk Coast & Heaths AONB including reduced tranquillity, particularly when considered cumulatively with the Chapel Works proposal (which has since been withdrawn).
- 8.27. In addition to harm to the AONB, the development falls within the 13km protection zone of European Designated Sites. As set out in the Suffolk Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) Local Plan policy DM27 seeks to support the Article 6(3) of the Habitats Directive where proposals that would cause a direct or indirect adverse effect (alone or combined with other plans or projects) to the integrity of internationally and nationally designated areas will not be permitted unless prevention, mitigation and where appropriate compensation measures are provided such that net impacts are reduced to a level below which the impacts no longer outweigh the benefits of development.
- 8.28. Part of the measures proposed to mitigate the impact of increased recreational disturbance on nearby European designated sites involves the provision of Suitable Alternative Natural Greenspaces (SANGs) in the form of two walking routes on the golf course. Whilst this would help with the mitigation of such impacts, no specific details are provided on what form these routes would take or how attractive they would be to users. The proposed paths, by the nature of their location, are in close proximity to active parts of the golf course which may decrease their attractiveness to walkers and dog walkers. From the submitted details it is not

clear that appropriate onsite SANGs are available in order to ensure that measures necessary to mitigate the impact on European designated sites can be delivered.

- 8.29. Equally, whilst the Golf Course could provide a dog walking route it could also enable the creation of a new off-road route leading towards the Deben Estuary Special Protection Area (SPA), so increasing the possibility of dog walking in the estuary rather than mitigating it. At present they would need to walk on the road (where there is no footway link). The new route could therefore only be effective if it also included measures to prevent (dog) walkers getting off the golf course at the eastern end. No boundary mitigation has been proposed which prevents informal paths out of the golf course forming, despite this concern being raised previously.
- 8.30. The Environmental Statement (ES) submitted with the application assesses the impacts of both this development and the proposed residential development (DC/19/2064/FUL) on the adjacent Chapel Works area. A combined assessment of the impacts of the two schemes is presented which makes consideration of the impacts of the individual schemes more difficult, particularly as the mitigation measures are combined (Section 7.6).
- 8.31. The ecology section of the ES identifies a number of receptors which could be impacted by the proposed development, including a number of protected and/or UK Priority species (under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006)).
- 8.32. In particular, unmitigated, the development will result in the loss of habitat for reptiles, foraging bats and nesting birds. However, the proposed landscaping scheme should largely provide replacement habitat for these groups provided that it can be implemented in accordance with the plans provided. A Construction Ecological Mitigation Plan (CEMP), Landscape and Ecology Management Plan (LEMP), a method statement for creation of the proposed heathland area and a Lighting Strategy would be required by condition to secure ecological enhancement and mitigation.
- 8.33. Any external lighting (excluding street lighting) would also be conditioned to prevent unnecessary intrusion into the countryside and the effect on residential amenity and ecology (in accordance with Local Plan Policy DM26).
- 8.34. Aside from details sought in the above conditions, the applicant has failed to submit relevant information in relation to potential disturbance caused by additional visitors to the European Designated Sites, or that there would be no harm or adverse impact, as such no screening assessment has been undertaken which is contrary to Regulation 42 of the 2011 Regulations which as a result the proposals are considered contrary to Suffolk Coastal District Local Plan Core Strategy and Development Management Development Plan Document Policy DM27, Spatial Strategy SP14 and Section 15 of the NPPF Protected and/or UK Priority Species.

#### Highway Safety

- 8.35. SCC as Local Highways Authority recommends a holding refusal until walking distances to key attractor facilities and services, along with a description of their measured walking routes including details of any mitigation proposed to address safety and usability issues, are provided. Such information is required to allow assessment of the proposed development in relation this application's compliance with NPPF 108:

*“In assessing specific applications for development, it should be ensured that:*

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users; and*
- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”*

- 8.36. Within the proposal, there does not appear to be an analysis of a proposed walking route to Waldringfield village, nor any proposed mitigation measures to address safety and/or accessibility/usability issues.
- 8.37. There are currently no segregated footways on the Ipswich Road carriageway route into Waldringfield village. There are two off-road bridleways (No29; and No24) connection which leads from the Ipswich Road/Newbourne Road cross-roads to School Lane in Waldringfield, but it has not been established by the applicant whether this currently has a surface suitable for, or can be modified to a surface suitable for, all-year-round/all-weather use.
- 8.38. From a planning perspective, the upgrade of the surface with a bound material would be intrusive and wholly inappropriate within the open countryside and is not considered to be a justified alternative in lieu of a sustainable footway link adjacent to the highway.
- 8.39. SCC highways recommend a further holding refusal until it can be established whether, after proportionate mitigation measures have been applied, a suitably safe pedestrian route to Waldringfield village could be provided. Furthermore Local Plan Policy SP11 states in order to make the best use of capacity within the local and strategic road and rail networks serving the district, to support the District’s strategic economic role both within the sub-region and nationally, to maintain quality of life and to contribute to reducing the impact of CO2 on climate change, the District Council will work with neighbouring authorities, the highway authority, public transport providers, developers and others to maximise opportunities for local journeys to be made by means other than the private motor car.
- 8.40. In relation to public transport this will include improving both the quantity and quality of the service on offer. In relation to foot and cycle provision this will mean securing safe and easy access to local facilities where walking or cycling offers a realistic alternative for most people.
- 8.41. The widths in Manual for Streets are for straight sections of roads. On bends, and at junctions, greater widths are required to accommodate the swept path of vehicles. SCC as LHA considers that some degree of widening of the Newbourne Road approach to the access junction should be considered in order to mitigate the potential hazard presented by the combination of the existing sub-standard road width alongside the increased traffic levels associated with the proposed development. SCC as LHA recommends a holding refusal until this highway safety issue is successfully addressed.
- 8.42. The proposed provision of 58 no. car parking spaces for the 58 no. chalets appears to fall short of the demand that will arise from the development. For a three-bedroom holiday chalet, that can accommodate three couples and their luggage, possibly meeting up from three different original destinations, it appears unlikely that one parking space would be

adequate unless each chalet's occupants arrived in a single car that accommodated six adults and their luggage. Whilst some of these vehicles may be able to park in the clubhouse car park, the likelihood is that these would be too far from the accommodation, which would result in cars parking on the access route around the site. Additionally if additional vehicles were to use the clubhouse car park, it puts pressure on vehicles using the clubhouse/swimming pool/golf course to park on the access or highway, should no parking be available on site.

- 8.43. Without the proposed development having provision of adequate parking facilities, SCC as LHA could not be assured that unsafe or obstructive parking would not arise on the surrounding highway network. Therefore, SCC as LHA recommends a holding refusal until provision of a more suitable number of parking spaces is demonstrated. Without adequate parking provision, the proposal would not accord with Local Plan Policy DM19 which requires new development to provide parking in accordance with the adopted parking guidance.

### Flood and Water

- 8.44. A holding objection has been received from SCC as the Lead Local Flood Authority (LLFA) on the basis of insufficient information having reviewed the following documents submitted with the application; RossiLong, Flood Risk Assessment/Surface Water Drainage Strategy, 171475, dated 15/10/2018 and A F Howland Associates, Ground Investigation Report, MSH/18.107, dated 15/10/2018.
- 8.45. The points below detail the actions required in order to overcome the LLFA's current objection:
- Submission of proposed ground levels;
  - Multiple lodges look to be located in existing low points, including in the OS mapped pond;
  - Assessment of proposed exceedance routes, including any potential impacts on the proposed new properties;
  - Details regarding the OS mapped pond that is identified within the site boundary;
  - Maintenance plan, including identifying an asset owner;
  - An assessment of the clay layer found in some sections of the site. Whilst this is unlikely to affect the crate soakaways as the depth of these could be increased, it could affect the functionality of the permeable paving structures;
  - Details of proposed surface water drainage for the proposed swimming pool building;
  - Additional infiltration testing across the site – this will be required before construction can begin. Given the cover of site investigation, the LLFA is happy with the consistency of sandy soils across the site and therefore be willing to condition this aspect to be discharged prior to commencement.
- 8.46. However, paragraph 165 of the NPPF states that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:
- a) take account of advice from the lead local flood authority;
  - b) have appropriate proposed minimum operational standards;
  - c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and

d) where possible, provide multifunctional benefits.

- 8.47. Whilst a sustainable drainage system could potentially be provided, this has not been confirmed by any means of evidence, therefore due to insufficient information, the scheme cannot be considered acceptable in accordance with policy DM22 (Design: Function), as there is no evidence that a sustainable drainage system can be provided, which would prevent surface water flooding (DM28).

#### Other Matters

- 8.48. In respect of residential amenity, Policy DM23 seeks to ensure all new development would not cause an unacceptable loss of amenity to adjoining or future occupiers of the development.
- 8.49. The proposal does not cause any loss of outlook, loss of light, or increased overlooking/loss of privacy that would consider the proposal to be contrary to the aspirations of DM23, subject to additional landscaping along the boundary with Newbourne Road. Although there is a potential for noise pollution to affect neighbouring properties.
- 8.50. The applicant has made little attempt to consider the potential for noise impact from the use of the site beyond a short passage in the Environmental Statement, providing little justification; *"... potential noise associated with holiday makers will be confined to the site and the immediate area."*
- 8.51. A development such as this has the potential to cause nuisance particularly where facilities and events are laid on for residents. Areas that may need to be considered in terms of nuisance potential are the pool (and associated plant), amplified music on the site and whether any heating plant such as air source heat pumps will be used for the holiday units, the aforementioned items are not exhaustive and all potential sources of noise should be considered and their impact assessed to ensure no aspect of the sites use may cause nuisance to nearby sensitive residential properties in an area of likely low background noise levels.
- 8.52. A specific assessment of potential noise impact may also be useful for the planning department in assessing impact on local amenity. Ultimately it may be considered the site has a low potential impact for noise, but this needs to be shown to have been considered and adequately justified which currently is not the case.
- 8.53. The site also has archaeological potential where full investigation would be required by condition.

#### Conclusion

- 8.54. Sport England comments are 'supportive' of the proposal, primarily in respect of the addition of the swimming pool; however their concluding comment is that they raise 'no objection' to the proposal. Whilst the additional facilities are considered a benefit, they are outweighed by the harm to the adjacent designated sites.

- 8.55. In principle, the proposal outlined above is contrary to Policies SP1, SP1a, SP7, SP8, SP14, DM12, DM23, DM26, DM27 and emerging policy SCLP6.3 and paragraph 172, 176 and 177 of the NPPF in addition to insufficient information for consideration in respect of noise, flood and water and highways safety, therefore is recommended for refusal.

## 9. RECOMMENDATION

**REFUSE** planning permission for the reasons outlined below:

### 1) Principle in AONB

The application site is a greenfield site to the east of the A12, within an unsustainable location detached from a sustainable settlement. It is an exposed part of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). Planning Permission is sought for up to 58 holiday/tourist units and associated facilities including a swimming pool and parking facilities.

Planning Policies seek to direct such developments to sustainable locations where they would not be detrimental to the landscape. Local Policy only permits tourism accommodation development in the form of conversions, improvements/minor extensions to existing facilities and small scale new development in unexposed areas of the Suffolk Coast and Heaths AONB, stating that they will only be acceptable within sustainable locations where a landscape assessment shows these could be accommodated with no adverse impact.

Similarly, the NPPF states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.

This proposal is for a new large-scale tourism development, not an expansion of an existing use. It is also located in an unsustainable location, poorly connected to sustainable settlements by public transport and paved paths. It is also a major development in the AONB, resulting in detrimental harm to the landscape of the AONB. The development is not in the public interest, as the recreational opportunities are no compensation for the harm. Therefore, there is no justification for an exceptional circumstance under paragraph 172 of the NPPF.

The proposal is therefore contrary to paragraph 172 of the NPPF, and Policies SP1, SP1A, SP7, SP8, SP15 and DM18 of the East Suffolk Council – Suffolk Coastal District Local Plan – Core Strategy and Development Management Development Plan Document.

### 2) Ecology & Protected Sites

The Suffolk Recreation Avoidance Mitigation Strategy ("Suffolk RAMS") identifies that new housing development within a 13km zone of influence ("ZOI") of any designated European site in Suffolk will have a likely significant effect on the interest features of those sites

through increased recreational pressure, both alone and in-combination with other housing in the ZOI. To mitigate this, on site mitigation measures and a per-dwelling financial contribution is required to fund the Suffolk RAMS.

No specific details are provided on what form the onsite walking routes would take or how attractive they would be to users. The proposed paths, by the nature of their location, would be in close proximity to active parts of the golf course which may decrease their attractiveness to walkers and dog walkers. From the submitted details it is not clear that appropriate onsite Suitable Alternative Natural Greenspace (SANGs) are available in order to ensure that measures necessary to mitigate the impact on European designated sites can be delivered. The proposed pathways could also enable the creation of a new off-road walking route leading towards the Deben Estuary Special Protection Area (SPA).

No planning obligation has been submitted with the application to deliver this financial contribution and, therefore, the Local Planning Authority cannot conclude 'no likely significant effects' from the development proposal on the designated site(s).

The applicant has failed to submit relevant information in relation to potential disturbance caused by additional visitors to the European Designated Sites, or that there would be no harm or adverse impact, as such no screening assessment has been undertaken which is contrary to Regulation 42 of the 2011 Regulations.

The proposal is therefore contrary to Section 15 of the NPPF and Local Policies SP14 and DM27 of the East Suffolk Council - Suffolk Coastal District Local Plan Core Strategy & Development Management Policies Development Plan Document (2013), which seek to protect designated sites in accordance with The Conservation of Habitats and Species Regulations (2017).

### 3) Sustainable Drainage

This is a Major Development, and therefore in accordance with Paragraph 165 of the NPPF, the development should incorporate sustainable drainage systems, unless there is clear evidence that would be inappropriate.

This application includes insufficient information in relation to surface water drainage issues, including ground levels, positioning of lodges within existing low points and the pond on the OS map, assessment of exceedance routes including any potential impacts on the proposed new properties, details of the OS mapped ponds, maintenance plan including an asset owner, assessment of the clay layer found in some sections of the site and impacts upon permeability, details of surface water drainage for the proposed swimming pool building, and additional infiltration across the site.

Whilst a sustainable drainage system could potentially be provided, this has not been confirmed by any means of evidence, therefore due to insufficient information, the scheme cannot be considered acceptable. As there is no evidence that a sustainable drainage system can be provided, which would prevent surface water flooding, the scheme is contrary to paragraph 165 of the NPPF, and East Suffolk Council – Suffolk Coastal District Local Plan – Core Strategy and Development Management Development Plan Document Policies DM22 (Design: Function) and DM28 (Flood Risk).

#### 4) Highway Safety, Access and Parking Provision

The roads providing access to the site and the nearest settlements containing services and facilities have no footways/pavements. It is acknowledged that there are two off-road bridleways (No29 and No24), but it has not been established by the applicant whether these currently have a surface suitable for or can be modified for all-year-around/all-weather access. The applicant has also failed to provide details of walking distances to key attractor facilities and services, along with a description of their measured walking routes including details of any mitigation proposed to address safety and usability. Therefore, it has not been demonstrated that a suitably safe pedestrian and/or cycle route to Waldringfield Village could be provided.

The Local Highway Authority has also identified a requirement for road widening of the Newbourne Road Approach, in order to mitigate the potential hazard presented by the combination of the existing sub-standard road width alongside the increased traffic levels associated with the proposed development.

Only one parking space per chalet is proposed, which would be inadequate to meet the likely demand for onsite parking arising from the proposed development, creating additional pressure for parking in the clubhouse/swimming pool/golf club carpark, on the access and/or on the highway. Therefore, it could not be assured that unsafe or obstructive parking would not arise on the surrounding highway network.

Therefore, it has not been demonstrated that the development would enable safe and useable access and parking provision for future users/occupants of the development. Therefore the proposal is contrary to Section 9 of the NPPF, which requires that developments provide appropriate opportunities to promote sustainable transport modes, safe and suitable access to the site to be achieved for all users, and that any significant impacts upon the transport network or highway safety can be cost effectively mitigated to an acceptable degree.

It is also contrary to Policies SP11, DM19, and DM22 of the East Suffolk Council - Suffolk Coastal District Local Plan Core Strategy & Development Management Policies Development Plan Document (2013), which seeks to maximise opportunities for local journeys to be made by means other than the private motor car, and require that proposals need to make provision for their functional requirements, including adequate provision for public transport, cars, cycling, parking areas, accessways, footways etc.

#### 5) Residential Amenity

The site is an area where there is likely to be low background noise levels, and therefore any increase in activity and associated noise, as significant potential to result in nuisance.

Due to the scale and nature of development, including proposed facilities, such as the pool and associated plant, any heating plant for the holiday units and activities associated with the holiday let use, such as music, there would be a number of potential sources of noise, which could result in noise and nuisance to nearby sensitive receptors (the residential properties).

The application did not include a specific assessment of potential noise impact upon local amenity.

Therefore, it has not been demonstrated that there would be no harm to residential amenity and so the application is contrary to policy DM23 (Residential Amenity) of the East Suffolk Council – Suffolk Coastal District Local Plan – Core Strategy and Development Management Development Plan Document.

**BACKGROUND INFORMATION:**

See application reference(s): DC/17/0494/FUL, DC/18/0180/FUL, DC/18/3823/SCO and DC/19/02064/FUL at [www.eastsuffolk.gov.uk/public-access](http://www.eastsuffolk.gov.uk/public-access)