

Committee Report

Planning Committee South – 21 July 2020

Application no DC/20/1033/FUL

Location

Easton Farm Park
Sanctuary Bridge Road

Easton Suffolk IP13 0EQ

Expiry date 27 April 2020

Application type Full Application

Applicant Mr B Emley

Parish Easton

Proposal Construction of recreational lake and use for low ropes course to include

reception and changing room building.

Case Officer Natalie Webb

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1. Summary

- 1.1. The application seeks the construction of a recreational lake and use for low ropes course to include reception and changing room building at Easton Farm Park, Sanctuary Bridge Road, Easton, IP13 OEQ. Whilst the development would be considered to have benefits to tourism and support a local business, it is considered that the harm caused to a sensitive landscape outweighs these benefits, the application is therefore recommended for refusal.
- 1.2. The application was presented to the referral panel on 16th June 2020 as officers were minded to refuse the application, contrary to the Parish Council's support. It was considered that there were material planning considerations which warrant further discussion by the planning committee; the application is therefore presented to the planning committee for consideration.

2. Site description

- 2.1. The site is located outside of any physical limits boundary and is therefore considered to be in the countryside for planning purposes. The site is set back from the highway, accessed via a long private driveway from Sanctuary Bridge Road. The river Deben runs to the east, south and west of the site, which is otherwise surrounded by agricultural fields. The location for the recreational lake and associated building are to the south-western corner of the main farmstead and lie within flood zones 2 and 3. The site also lies within Landscape Character Area B7 Deben Valley, as defined by the Suffolk Coastal Landscape Character Assessment.
- 2.2. The site has an extensive planning history associated with the farm park business, including holiday lodges, toilet/shower blocks and picnic areas. Planning permission was granted in 2015 (DC/15/3165/FUL) for a 70 space caravan and campsite and the campsite is now open for tents, caravans and motorhomes. There are also 3 glamping pods on site.

3. Proposal

3.1. The proposal at Easton Farm Park is for the construction of a recreational lake over which a low ropes course will be erected. A reception building will be constructed of timber clad with a Perspex sheeted roof which will contain the main reception, 2 stores which will hold the buoyancy equipment and 2 changing rooms. The building will be sited adjacent to the lake.

4. Consultations/comments

4.1. No third-party representations were received.

Consultees Parish/Town Council

Consultee	Date consulted	Date reply received	
Easton Parish Council	6 March 2020	30 March 2020	
Summary of comments:			
Easton Parish Council fully Supports this Planning Application			

Statutory consultees

Consultee	Date consulted	Date reply received
Suffolk County - Highways Department	6 March 2020	12 March 2020

Summary of comments:

Given the existing use of the site, this proposal is unlikely to have a significant impact on the highway network in terms of vehicle volume or highway safety. Therefore, Suffolk County Council as a highway authority does not wish to restrict the granting of permission.

Consultee	Date consulted	Date reply received
SCC Flooding Authority	6 March 2020	12 March 2020
Summary of comments:		
We have reviewed the submitted docu		ales on this annihostion

Consultee Date consulted Date reply received

Suffolk County Archaeological Unit 6 March 2020 17 March 2020

Summary of comments:

Recommends a pre-commencement condition in respect of a written scheme of investigation for the application site and post investigation assessment prior to first occupation of the building.

Non statutory consultees

Consultee	Date consulted	Date reply received
Landscape Team (Internal)	N/A	15 April 2020
Summary of comments:		

Comments received and are incorporated into the Officer's report; full comments are available on the Council's website.

Consultee	Date consulted	Date reply received
East Suffolk Internal Drainage Board	N/A	12 March 2020

Summary of comments:

The site is partly within the Internal Drainage District (IDD) of the East Suffolk Internal Drainage Board (IDB). The proposed development seeks to discharge water via infiltration which will require separate consent granted by the Board which may impact the deliverability of the proposed development. No drainage strategy or plan was provided as part of the application.

Consultee	Date consulted	Date reply received
Suffolk Wildlife Trust	6 March 2020	No response
Summary of comments:		
No response received.		

Consultee	Date consulted	Date reply received
Ecology (Internal)	6 March 2020	2 April 2020
6		
Summary of comments:		

Comments received and are incorporated into the Officer's report; full comments are available on the Council's website.

Consultee	Date consulted	Date reply received
Design And Conservation (Internal)	6 March 2020	No response
Summary of comments:		
No response received.		

Consultee	Date consulted	Date reply received
Economic Development (Internal)	6 March 2020	27 March 2020

Summary of comments:

The proposal to further enhance the current visitor experience at Easton Farm Park is welcomed.

Date consulted	Date reply received
6 March 2020	20 March 2020

Consultee	Date consulted	Date reply received
Planning Policy (Internal)	6 March 2020	27 March 2020

Summary of comments:

Comments received and are incorporated into the Officer's report; full comments are available on the Council's website.

Publicity

The application has been the subject of the following press advertisement:

Category	Published	Expiry	Publication
Archaeological Site	12 March 2020	2 April 2020	East Anglian Daily Times

Site notices

General Site Notice Reason for site notice: May Affect Archaeological SiteAffects

Setting of Listed Building
Date posted: 16 March 2020
Expiry date: 6 April 2020

5. Planning policy

- 5.1. 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.
- 5.2. In addition to considering applications in accordance with the National Planning Policy Framework (NPPF 2019) and the National Planning Policy Guidance (NPPG), Section 38 of the Planning and Compulsory Purchase Act 2004 requires applications to be determined in accordance with the Local Planning Authority's 'Development Plan', unless material considerations indicate otherwise.
- 5.3. East Suffolk Council's Development Plan, as relevant to this proposal, consists of:
 - East Suffolk Council Suffolk Coastal District Local Plan Core Strategy and Development Management Development Plan Document (Adopted July 2013);
 - East Suffolk Council Suffolk Coastal District Local Plan Felixstowe Peninsula Area Action Plan (Adopted January 2017) and;
 - The 'Saved' Policies of the Suffolk Coastal Local Plan incorporating the first and second alterations.
- 5.4. The relevant policies of the Suffolk Coastal District Local Plan Core Strategy and Development Management Development Plan Document (Adopted July 2013) are:
 - SP7 Economic Development in the Rural Areas (East Suffolk Council Suffolk Coastal District Local Plan - Core Strategy and Development Management Development Plan Document (July 2013))
 - SP8 Tourism (East Suffolk Council Suffolk Coastal District Local Plan Core Strategy and Development Management Development Plan Document (July 2013))
 - SP16 Sport and Play (East Suffolk Council Suffolk Coastal District Local Plan Core Strategy and Development Management Development Plan Document (July 2013))

- SP14 Biodiversity and Geodiversity (East Suffolk Council Suffolk Coastal District Local Plan - Core Strategy and Development Management Development Plan Document (July 2013))
- SP15 Landscape and Townscape (East Suffolk Council Suffolk Coastal District Local Plan - Core Strategy and Development Management Development Plan Document (July 2013))
- XSP19 Settlement Hierarchy (East Suffolk Council Suffolk Coastal District Local Plan -Core Strategy and Development Management Development Plan Document (July 2013))
- SP29 The Countryside (East Suffolk Council Suffolk Coastal District Local Plan Core Strategy and Development Management Development Plan Document (July 2013))
- SP1 Sustainable Development (East Suffolk Council Suffolk Coastal District Local Plan - Core Strategy and Development Management Development Plan Document (July 2013))
- SP1a Presumption in Favour of Sustainable Development (East Suffolk Council -Suffolk Coastal District Local Plan - Core Strategy and Development Management Development Plan Document (July 2013))
- DM19 Parking Standards (East Suffolk Council Suffolk Coastal District Local Plan -Core Strategy and Development Management Development Plan Document (July 2013))
- DM21 Design: Aesthetics (East Suffolk Council Suffolk Coastal District Local Plan -Core Strategy and Development Management Development Plan Document (July 2013))
- DM23 Residential Amenity (East Suffolk Council Suffolk Coastal District Local Plan -Core Strategy and Development Management Development Plan Document (July 2013))
- DM32 Sport and Play (East Suffolk Council Suffolk Coastal District Local Plan Core Strategy and Development Management Development Plan Document (July 2013))
- DM27 Biodiverity and Geodiversity (East Suffolk Council Suffolk Coastal District Local Plan - Core Strategy and Development Management Development Plan Document (July 2013))
- DM28 Flood Risk (East Suffolk Council Suffolk Coastal District Local Plan Core Strategy and Development Management Development Plan Document (July 2013))
- SSP2 Physical Limits Boundaries (East Suffolk Council Suffolk Coastal District Local Plan - Site Allocations and Area Specific Policies Development Plan Document (January 2017))

- SP6 Regeneration (East Suffolk Council Suffolk Coastal District Local Plan Core Strategy and Development Management Development Plan Document (July 2013))
- DM14 Farm Diversification (East Suffolk Council Suffolk Coastal District Local Plan -Core Strategy and Development Management Development Plan Document (July 2013))

6. Planning considerations

- 6.1. The new Local Plan (covering the former Suffolk Coastal area) was submitted to the Planning Inspectorate for examination on Friday 29th March 2019. PINS confirmed the submission and the examinations were held in August/September 2019. The Inspectors letter of 31st January 2020 states "Overall, I consider that, subject to main modifications, the Plan is likely to be capable of being found legally compliant and sound. The local plan is currently in public consultation following the main modifications.
- 6.2. In relation to the current weight that can be attributed to the policies in the emerging Suffolk Coastal Local Plan, paragraph 48a) of the 2019 NPPF sets out that the more advanced the emerging plan in the plan making process, the greater the weight that may be afforded to the policies within it. Paragraph 48b) of the NPPF states that weight given to emerging Plan policies should also be determined according to the extent to which there are unresolved objections to the relevant policies of the emerging Plan and states that the less significant the unresolved objections the greater the weight that may be attributed. Paragraph 48c) of the NPPF establishes that the greater the consistency of the relevant policies in the emerging Local Plan to the Framework, the greater the weight that may be attributed to such policies. The emerging Local Plan has been written with the intention to align with the provisions of the NPPF.
- 6.3. The emerging Local Plan Policies which are considered relevant in respect of this proposal, but have limited weight at this stage are:
 - o SCLP3.2 Settlement Hierarchy
 - o SCLP3.3 Settlement Boundaries
 - o SCLP4.5 Economic Development in Rural Areas
 - o SCLP4.7 Farm Diversification
 - o SCLP6.1 Tourism
 - o SCLP6.2 Tourism Development
 - o SCLP6.4 Tourism Development outside the AONB
 - o SCLP7.1 Sustainable Transport
 - o SCLP7.2 Parking Proposals and Standards
 - o SCLP9.5 Flood Risk
 - o SCLP10.1 Biodiversity and Geodiversity
 - o SCLP10.2 Environmental Quality
 - o SCLP10.4 Landscape Character
 - o SCLP11.3 Historic Environment
 - o SCLP11.4 Listed Buildings
 - o SCLP11.7 Archaeology

- 6.4. Due to the limited weight awarded to the above policies, the development has been assessed in accordance with the adopted Core Strategy Policies outlined above, unless otherwise stated within this report.
- 6.5. Easton Parish Council are in the process of producing a Neighbourhood Plan covering the parish of Easton. However, as yet there are no draft policies with which to consider the proposals against.

Principle of Development

- 6.6. As noted above, the site lies outside of the physical limits boundary and is therefore in the countryside for planning purposes. The strategy in respect of new development outside the physical limits of those settlements defined as Major Centres, Towns, Key and Local Service Centres is that it will be limited to that which of necessity requires to be located there and accords with other relevant policies within the Core Strategy (e.g. Policies SP7 or DM13).
- 6.7. Opportunities to maximise the economic potential of the rural areas, particularly where this will secure employment locally, will be generally supported, particularly where it would encourage small-scale farm and rural diversification or expand the tourism opportunities (when compatible with the objectives of SP8). While Core Strategy Policy SP7 is generally supportive of the proposal, this is subject to consideration of environmental and sustainability objectives, it is noted above that the proposal will not generate local employment. This is unfortunate given Policy SP7 looks favourably on proposals that secure employment locally.
- 6.8. Core Strategy Policy SP8 (Tourism) is supportive of tourism development west of the A12, as established by criterion g), subject to impacts on the environment including traffic generation. As detailed in the consultation response from SCC Highways (outlined below), the proposal is unlikely to have a significant impact on the highway network in terms of vehicle volume or highway safety.
- 6.9. In respect of farm diversification, Core Strategy Policy DM14 (Farm Diversification) sets out that proposals for farm diversification must satisfy criteria a)-d) as follows:
- 6.10. The use is similar to a number of other operations on the farm and the proposed building is of a diminutive scale that is not overbearing and would be somewhat compliant with Core Strategy Policy DM21 (Design: Aesthetics), however would also be somewhat detached from the main farmstead; therefore out of context with the rest of the site (Core Strategy SP15). As mentioned previously the consultation response from SCC Highways is clear that the proposal is not expected to have a significant impact on the highway network. Furthermore, due to the relatively small scale of the building and the distance to the nearest inhabited building it seems unlikely for the proposal to unacceptably impact the living conditions of local residents (compliant with Core Strategy Policy DM23). The proposal therefore accords with DM14(a).
- 6.11. The Planning Statement accompanying the application states in section 5.1 that the proposal "will further assist with the viability and sustainability of the farming and diversified enterprises". There is no reason to believe that this is not the case; the development has not been proposed as an enabling development as such no details of

viability are necessary in this instance. Thus, the proposal should be considered to comply with criterion (b).

- 6.12. The application form (at section 18) confirms that the proposal will not generate local employment.
- 6.13. Thus, it is assumed that the operations must be run by existing staff, which would accord with criterion (c) or provide employment from outside of the district which would not accord with DM14(c). Criterion (d) does not apply to this proposal as no residential uses are included within the proposal.
- 6.14. Core Strategy Policy SP6 (Regeneration) is also of relevance in relation to diversification, which is established as a priority in a number of areas across the former Suffolk Coastal area. One of which is the rural areas, and of particular importance is diversification arising within the agricultural economy. The proposal acts to strengthen the economic potential of Easton Park Farm in diversifying from an agricultural entity, and thus is supported by Policy SP6. Proposals for new facilities for sport and play will be considered in relation to the character of the location, the scale of the settlement, the impact on landscape and townscape, access provision, highway safety and residential amenity (Core Strategy Policy DM32). It is also noted that the Economic Development team have supported this proposal.
- 6.15. It is therefore considered that the principle of development is acceptable, subject to the proposal according with other policies within the adopted framework as outlined above; particularly in respect of the impact on the highways network, residential amenity and landscape.

Landscape & Ecological Impact

- 6.16. Core Strategy Policy SP8 is clear that proposals are expected to be accompanied by biodiversity and habitats assessments. Whilst no such assessments have been submitted and the Council's Ecologist has reviewed the proposal and concluded that the area for the proposed lake appears to be located in an area of horse paddock. This is understood to be reseeded/improved grassland and therefore, when combined with the current use, means that the area is likely to be of low biodiversity value. Therefore, there is no in-principle objection to the proposal. However the excavation and vehicle movements should be kept outside of the root protection zones of the trees to the south and west and at least 5m from the watercourse to the south and west and it should be clarified where the soil dug from the lake is to be disposed of to ensure that that activity is not likely to have any adverse ecological impacts, prior to any development commencing on site. The proposal would not be liable for contribution towards Suffolk RAMS. The proposal, subject to details identified above, is considered to accord with Core Strategy Policies SP14 and DM27.
- 6.17. Core Strategy Policy SP7 also requires consideration of impacts arising from the proposal on the environment to be considered. Core Strategy Policy SP15 (Landscape and Townscape) notes the River Deben valley and tributaries, amongst others, as a particularly significant landscape worthy of protection.
- 6.18. The Suffolk Coastal Landscape Character Assessment (2018), which can be found on the Council's examination webpage (Document D20), states that it is important to "manage land use in the floodplain in favour of traditional management practices such as grazing by

cattle or sheep, and resist conversion to equestrianism, intake to domestic curtilage" (p37). Although attention here is paid to equestrianism and residential curtilage expansion, this may be due to the greater likelihood of such development coming forward, and thus the impact of the proposal may be equally harmful.

6.19. As stated above, the site is identified within the Suffolk Coastal Landscape Character Assessment, Landscape Character Area B7 Deben Valley, key features of which are:

"Special Qualities and Features

- o The scenic, meandering course of the River Deben provides the focus all the way down the valley with its networks or tree edged pastures and scenic gently rolling landform providing strong traditional rural character. There are minimal detracting modern features, except for the interruption by major transport corridors which pass through the valley at Wickham Market.
- o The unity and quality of the historic, linear villages, with a wealth of listed buildings, strung along the valley contributes positively to its character, as do the ancient farmsteads encountered in the countryside.
- o The first few hundred metres of the river valley north of the Wilford Bridge is included with the Deben Estuary RAMSAR, SPA and SSSI sites.

Condition

The meadowlands have generally changed little over the centuries and continue to be well managed under grazing and hay making, although equestrianism has a less positive effect, as do the poplar plantations. On village edges there is pressure for domestic or recreational land uses to creep into the flood plain but on the whole the condition is reasonably good."

- 6.20. From this extract of the Suffolk Coastal Landscape Character Assessment it is clear that the river valley meadows are an important element of the local landscape, something that is recognised by the Special Landscape Area status of the site and the river valley as a whole.
- 6.21. The proposal will see the introduction of an excavated lake adjacent to the river, and where normal geomorphological processes would not normally create one, and then to introduce recreational equipment in the lake, thus adding a further uncharacteristic feature into the landscape, together with the associated changing room/reception building. The current views from the Easton Hoo road are of a highly characteristic landscape across the meadows and include grazing pasture, and tree edged drains and river bank.
- 6.22. It is unfortunate that the application does not include precise details of the route of the proposed low ropes course, or the heights of the posts/framework that would have to be positioned within the new lake. These details have been requested from the applicants agent but have not been supplied. However, based upon the submitted indicative pictures of similar low ropes courses elsewhere it is clear that it the scheme would involve a significant number of tall up right posts, which in addition to the creation of the lake and associated changing rooms/reception building would be an alien feature in this landscape.
- 6.23. It is noted that the consented campsite to the north of the proposed development does already have an impact on this sensitive landscape; albeit additional landscaping (vegetation) was consented and has been implemented as part of that application. The applicant has shared photographs of this landscaping for consideration during the

application and it is accepted that once this establishes (if properly managed and maintained), there would be less of visual impact from the highway, but the adverse landscape impact would remain.

- 6.24. Emerging Policy SCLP10.4 (Landscape Character) has limited weight as it is subject to consultation as part of the main modifications, but does further protect the aforementioned designated landscape character areas, stating that "proposals for development should be informed by, and sympathetic to, the special qualities and features as described in the Suffolk Coastal Landscape Character Assessment (2018), the Settlement Sensitivity Assessment (2018), or successor and updated landscape evidence. Development proposals will be expected to demonstrate their location, scale, form, design and materials will protect and enhance:
 - a) The special qualities and features of the area;
 - b) The visual relationship and environment around settlements and their landscape settings;
 - c) Distinctive landscape elements including but not limited to watercourses, commons, woodland trees, hedgerows and field boundaries, and their function as ecological corridors; d) Visually sensitive skylines, seascapes, river valleys and significant views towards key landscapes and cultural features; and
 - e) The growing network of green infrastructure supporting health, wellbeing and social interaction.

Development will not be permitted where it will have a significant adverse impact on rural river valleys, historic park and gardens, coastal, estuary, heathland and other very sensitive landscapes."

- 6.25. Paragraph 127 of the National Planning Policy Framework, criterion (c) states "planning policies and decision should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)." Furthermore paragraph 170(a) states that planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status. identified quality in the development plan);
- 6.26. The inclusion of the proposed development would introduce a notably uncharacteristic element into a little changed, and historically intact landscape. The Council's Landscape and Arboricultural Manager has opposed the proposal, raising concerns over the impact of this proposal on the designated landscape. In this instance there is no information to suggest that the unacceptable adverse landscape impacts can be suitably mitigated.

Highway Safety

6.27. Core Strategy Policy SP11 (Accessibility) encourages journeys to be made by means other than the private car. However, as has been noted by SCC Highways the proposal is unlikely to have a significant impact on the highway network in terms of vehicle volume or highway safety. Moreover, the nature of economic development in rural areas, as supported by the aforementioned policies, is one of limited access to sustainable transport. SCC Highways have not requested any conditions in respect of parking availability associated with the

proposed development, therefore it is considered that the development accords with Core Strategy DM19 (Parking Standards).

Flood & Water

- 6.28. Core Strategy Policy DM28 (Flood Risk) requires all development within Flood Zones 2 and 3 to be supported by a Flood Risk Assessment, which the applicant has provided and concludes that "there would be a net gain in flood water holding capacity and the lake would have a beneficial impact on the floodplain." The consultation response from SCC Flood and Water Management makes no comment, which satisfies that the proposal and supporting Flood Risk Assessment do not make inaccurate assertions.
- 6.29. The site is partly within the Internal Drainage District (IDD) of the East Suffolk Internal Drainage Board (IDB). The proposed development seeks to discharge water via infiltration which will require separate consent granted by the Board which may impact the deliverability of the proposed development. No drainage strategy or plan was provided for consideration as part of this application.

7. Conclusion

- 7.1. In summary, the proposal would support the economic potential of Easton Park Farm through diversification of economic activity. Consultation responses from both SCC Highways and SCC Floods and Water Management reflect positively on the proposal. The submitted information is somewhat lacking in detail in respect of the proposed water ropes course; additional details have been requested from the applicant, but are yet to be provided. Without additional information, the extent of the harm to the landscape cannot fully be appreciated or assessed by officers.
- 7.2. However, weight needs to be given to harm to landscape and townscape character with particular regard to the River Deben. In this instance both the adopted and emerging policies would not support new development where it would be considered harmful to the character of the landscape. The site lies within Landscape Character Area B7 Deben Valley of the Suffolk Coastal Landscape Character Assessment (2018) where the proposed development consists of an uncharacteristic feature on an otherwise unchanged highly characteristic and historical landscape, contrary to Core Strategy Policy SP15 and Paragraphs 127(c) and 170(a) of the NPPF. In this instance it is not considered that unacceptable adverse landscape impacts can be suitably mitigated.

8. Recommendation

8.1. Refuse planning permission for the reasons set out below.

The reason for the decision to refuse permission is:

1. The application seeks the construction of a recreational lake and use for low ropes course, to include a reception and changing room building at Easton Farm Park, Sanctuary Bridge Road, Easton, IP13 0EQ.

It is accepted that this proposal would support the economic potential of Easton Park Farm through diversification of a rural economic activity. However, both the adopted and

emerging policies would not support new development where it would be considered harmful to the character of the landscape.

In the absence of details of the precise route of the course within the lake and the height of the posts/framework to support the ropes, the visual impact is not defined, but it is clear that there would be significant landscape impact arising from the lake and low ropes course upon this sensitive valley landscape.

The site lies within Landscape Character Area B7 Deben Valley of the Suffolk Coastal Landscape Character Assessment (2018) where the proposed development consists of an uncharacteristic feature on an otherwise unchanged highly characteristic and historical landscape, contrary to Core Strategy Policy SP15, emerging Local Plan Policy SCLP10.4 and Paragraphs 127(c) and 170(a) of the NPPF. In this instance it is not considered that unacceptable adverse landscape impacts can be suitably mitigated.

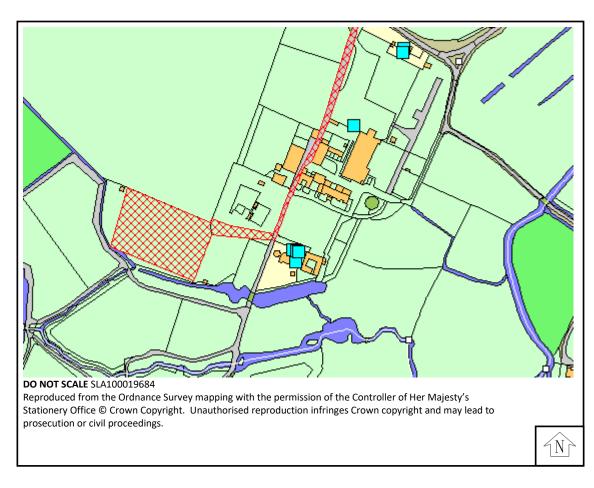
Informatives:

1. The Council offers a pre-application advice service to discuss development proposals and ensure that planning applications have the best chance of being approved. The applicant did not take advantage of this service. The local planning authority has identified matters of concern with the proposal and the report clearly sets out why the development fails to comply with the adopted development plan. The report also explains why the proposal is contrary to the objectives of the National Planning Policy Framework and local plan to deliver sustainable development.

Background information

See application reference DC/20/1033/FUL at https://publicaccess.eastsuffolk.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=Q6MHI1QXI6300

Map



Key



Notified, no comments received



Objection



Representation



Support