



Committee Report

Planning Committee North - 12 January 2021

Application no DC/20/3142/FUL

Location

High Lodge Leisure
Darsham Road
Hinton
Blythburgh
Saxmundham
Suffolk
IP17 3QT

Expiry date 7 December 2020

Application type Full Application

Applicant Darwin Leisure Development Properties (Guernsey) Ltd

Parish Blythburgh

Proposal Redevelopment of golf course and vacant paddock land for the siting of 170 holiday lodges, 3 tree houses, new Facilities Building, Maintenance and Housekeeping Building, car parking and associated highway works.

Case Officer Michaelle Coupe
(01394) 444440
michaelle.coupe@eastsoffolk.gov.uk

1 Summary

- 1.1 This application is for a significant extension to an existing holiday and leisure facility at Hinton within the parish of Blythburgh. It proposes 170 holiday lodges, 3 treehouses and a central facilities building containing a restaurant, bar and cafe along with leisure facilities including an indoor swimming pool, on land currently in use as a golf course. The existing clubhouse, holiday lodges, shooting range and fishing facilities would remain in separate operation under the current High Lodge ownership.
- 1.2 The site is located in the countryside, alongside the A12 between Darsham and Thorington and is outside the Suffolk Coast and Heaths Area of Outstanding Natural beauty (AONB). The recommendation is Authority to Determine with approval being

recommended on the submission of additional information to satisfactorily address holding objections from the Highway Authority and Suffolk County Council Floods Authority, and to address ecological issues.

- 1.3 The application has been referred direct to the Planning Committee (North) by the Head of Planning and Coastal Management due to the significant local interest.

2 Site description

- 2.1 High Lodge Leisure, 'High Lodge', is a 48.5 hectare site which lies on the east side of the A12 approximately 2km north of Darsham and south of Thorington. The village of Bramfield is also close by to the west. At present the site offers a range of leisure activities including holiday lodges, shooting school, golf and fishing, along with a restaurant, clubhouse and function suite.
- 2.2 Vehicular access to the site is gained via a private driveway of approximately 5 metres in width, with passing places for larger vehicles at regular intervals, leading northeast from Hinton Road, which in turn connects to the A12 by means of a priority junction approximately 40m to the west of the site access junction. On the opposite side of this junction is the Two Magpies Bakery/Café. On the opposite side of the A12 is Peacock Farm which includes a grade II listed farmhouse.
- 2.3 Hinton Road is a single carriageway road of approximate width 5.5m in the vicinity of the access with High Lodge, though narrowing further east to 3-4m in width. The road has no footways or street lighting, and also provides access to agricultural properties/land and Haw Wood Farm Caravans and Camping, approximately 730m east of the High Lodge access.
- 2.4 The Site is relatively well screened by existing vegetation with the boundaries of the Site formed of mature trees and well-established hedgerows, particularly along the northern and southern edge. Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) is located approximately 3km south east of the site. There are a number of areas designated for their conservation value to the east of the site including SAC, SPA, Ramsar and SSSIs. The nearest of these is Minsmere-Walberswick SPA/Ramsar that is also designated as Minsmere-Walberswick heaths and marshes SAC/SSSI, located approximately 0.9 mile to the east of the Site. Ancient woodland lies to the north of the site.

3 Proposal

- 3.1 The application is for the development of 24.7 hectares of the land, which is largely used as a golf course at present, to provide 170 holiday lodges, three treehouses and a central facilities building containing a restaurant, bar and cafe along with leisure facilities including an indoor swimming pool. The existing clubhouse, holiday lodges, shooting range and fishing facilities would remain in separate operation under the current High Lodge ownership.
- 3.2 The applicants state the demand for golf facilities has seen a national decline in recent years, particularly for nine-hole pay and play courses such as High Lodge, but that there has been a sizeable increase in demand for high quality holiday accommodation

that would complement the shooting and fishing provision that will remain at the adjacent High Lodge site. The units would fall under the legal definition of a caravan under the 'Caravan Sites and Control of Development Act 1960.' They are therefore not fixed built lodge development and can be removed if required.

- 3.3 Existing field boundary hedges and trees are proposed to be retained and enhanced, as well as the existing linear tree belts located within the golf course.
- 3.4 The main access would be re-configured, and there would be off-site highway improvement works in the form of a ghost island right turn lane at the existing Hinton Road/A12 Junction. The applicants state this is not required in pure capacity terms; however, it will provide safety benefits given the increase in right turning vehicles from the A12. Visibility splays of 4.5m x 215m will be provided, commensurate with the 60mph speed limit.
- 3.5 A new Spine Road will be provided along the northern boundary of the site, 15m from the Ancient woodland, serving both the proposed lodge accommodation and the existing High Lodge Leisure site. The corridor between the new spine road and the Ancient Woodland is to be planted as a wildflower meadow and used as a gradual dispersal swale for surface water from the road. There is a combination of both grouped parking and individual allocated parking spaces, with an average of 2 car parking spaces allocated per lodge. The whole site will also be connected via paths and walkways, linking all accommodation to the Central Facilities Building. All lodges will have path access suitable for electric buggies.
- 3.6 The field adjoining the A12, comprising around five hectares, is to remain open space and will include an attenuation pond with the material excavated forming a bund along the A12 boundary with additional planting. Ancillary infrastructure including a Housekeeping/Maintenance Facilities Building, a Gas Compound and Sewage Pumping Station are also proposed.
- 3.7 It is envisaged that around 35-40 members of staff would be employed at the park, the majority of whom would be in permanent full-time roles. In addition, there would be a number of contract cleaners with a core of around 15-20, but this could increase to 65-75 at busy times. The lodges would be suitable for year-round use, and it is stated in the submission that the estimated revenue generated to the local economy per annum would likely be £3,329,371.
- 3.8 The proposed Central Facilities Building (CFB) is located relatively central within the site and will act as a focal point to guests, allowing efficient arrival, parking and check-in, and thereafter direct access to lodges through secure vehicle/automatic number plate recognition. It will comprise the following:
 - Bar and Restaurant (including outside space for 40 restaurant covers, and 24 bar covers)
 - Gym
 - Café/Lounge
 - Two Lane Bowling Alley
 - Games Area
 - Children's Activity Room/Craft Area

- Indoor Swimming Pool
- Shop (selling local produce and essential facilities for guests)
- Administration and Staff Areas
- Male and Female Changing Area and Toilets
- Accommodation Check-In Area
- An Outdoor Splash Zone, Adventure Play Area and Tennis Court (located to the back of the CFB overlooked by the outdoor seating areas and accessible via pathways from the lodge accommodation areas).

3.9 The new lodge accommodation will comprise a range of unit sizes ranging from one to five bedrooms. The three tree houses will be open plan with en-suite shower room. The units will cater for a range of holiday guests from couples/small families, to large families and groups. Each of the units will be provided with either an external deck or a paved sitting area for outdoor enjoyment.

3.10 It is proposed to use a system of low-level lighting bollards fitted with low energy soft LED light fittings. These shine downwards to avoid light pollution and disturbance to nocturnal animals and will be located along the road edges and around some of the paths where additional lighting is required. In other areas around the Main Complex where it is explained more lighting is required and along the first section of the spine road, there will be a few high-level lighting columns introduced which are 5m height with antipollution heads which ensure that the light shines downwards, again fitted with soft white LED low energy fittings.

3.11 The application is supported by a number of documents including a Transport Assessment; Interim Travel Plan; Flood Risk assessment (FRA) and surface water drainage strategy; Arboricultural survey; Phase 1 Geo-Environmental Assessment; Noise Assessment; Ecology surveys; Habitat Regulations Assessment and Economic Statement.

4 Consultations

4.1 One letter of support has been received indicating it would provide many jobs and increase tourism spend in the area.

4.2 11 objections have been received raising the following key concerns (inter alia):

- The proposal is an overdevelopment, the scale of the development, which is the size of a village, is out of keeping with rural nature of area;
- Cause further congestion on the A12, the junction of Hinton Lane with the A12 cannot cope with the level of traffic likely to be generated together with the traffic generated by the adjacent bakery and another campsite located in Hinton Road;
- Traffic survey's not done at busiest times so traffic modelling is inaccurate;
- No account has been taken of Sizewell C traffic particularly given the proximity of a park and ride facility at Darsham;
- EDF also propose to alter the junction of the A12 and A144 which could affect the proposals to add a right turn lane;

- There is often queuing traffic along the A12 during the summer blocking residents accesses which will be made worse by the proposals;
- An alternative access should be sought;
- there will be additional pressure on local amenities and roads;
- Cause light pollution and likely affect the dark skies status of the nearby camp site;
- Cause increased noise and disturbance to residents;
- Adverse impact on wildlife by such a large number of people;
- The water pressure in the area is very low and this will compound the problem;
- Limited supply of water and electricity for residents and businesses;
- Too close to residential properties to the south, there should be more screening in the form of a bund and additional tree planting to reduce noise and visual impact;
- Too close to the AONB which should be preserved;
- The sewage and gas compound should be re-positioned close to main building away from neighbouring properties;
- Increase difficulty of crossing the road for users of the footpath directly opposite the site;
- The application should go to Planning Committee.

Consultees

Consultee	Date consulted	Date reply received
Blythburgh Parish Council	8 September 2020	29 September 2020
<p>Blythburgh Parish Council discussed this at a special meeting on 28 September 2020 and agreed the following.</p> <p>Blythburgh Parish Council are keen to encourage enterprise, welcome the creation of new jobs and support the potential for increased business for local shop keepers, pubs, restaurants and tourist sites. On this basis Blythburgh Parish Council does not object in principle to further development at the High Lodge site.</p> <p>However, Blythburgh Parish Council are concerned that an additional 170 holiday lodges and 367 car parking spaces to be over development of this site and have concerns about the adequacy of infrastructure to support a development of this size, namely:</p> <ul style="list-style-type: none"> -Access / egress from and to the A12. There is mention in the actual application of altered access to the public highway but details appeared lacking. -Capacity of Foul sewer -Will upgrading the electricity supply will be realistic and adequate? -The adequacy of water pressure to support this size of development. -Internet connectivity must be enhanced -Much additional lighting is required ' what is the impact on bats and where are the safeguards? <p>The High Lodge site is close to an AONB and Blythburgh Parish Council are concerned about the impact of this development on the "landscape & scenic beauty" of the AONB (the NPPF gives this the highest state of protection). Furthermore, during a previous site visit, birds seen included, Barn Owl (a Schedule 1 protected species), Grey Partridge (endangered species), Common Buzzard, Bullfinch, Reed Warbler and several other warbler species. A visit to the site within the last 2</p>		

weeks reinforced Blythburgh Parish Councils view that there is a lot of wildlife on this site and specific provision should be made to provide new habitats for all species should this development go ahead. We are further concerned that guidance received indicates that no EIA is required. If approved restrictions should be in place to ensure it remains holiday accommodation.

Consultee	Date consulted	Date reply received
Thorington Parish Council (neighbouring Parish)	10 September 2020	1 October 2020

Bramfield and Thorington Parish Council object to the proposed development at High Lodge, Hinton. It was concluded that the scale of development was wholly inappropriate to this rural location.

Councillors objected to the adverse impact that the development would have on the amenity of nearby residents as a result of noise (particularly in the evenings when there would likely be entertainment), light pollution and traffic movements. It was also considered that the junction with the A12 (notwithstanding the changes proposed) is not suitable for the huge increase in traffic that would result from the scale of the development proposed.

The impact the proposal would have on the wildlife in the area is also extremely worrying. It is appreciated that an Environmental Report was submitted with the application. However, residents familiar with the area (and the wildlife within it) are surprised how little was found. It was suggested that this is not truly representative of the number of species (and the number of each species) that are actually present on the site and surrounding area.

Councillors felt that the development would have a negative impact on the appearance of this rural location by reason of its scale and the limited attempts to integrate the proposals into the surrounding landscape (bundling is not considered ideal).

Concerns were also raised regarding the ability of existing infrastructure to cope with the addition of 170 units of accommodation. Drainage, water supplies and power provision are already reported to be at their limits by local residents. No indication of how the services will be improved to cope with the extra demand is provided within the application.

Statutory consultees

Consultee	Date consulted	Date reply received
Natural England	8 September 2020	11 September 2020

Summary of comments:

Advise that contributions will be required to be made to the Suffolk RAMS and that as the site is close to the AONB impacts on this national designation should be considered as well as regard given to the landscape policies of the Local Development Plan.

Consultee	Date consulted	Date reply received
Environment Agency - Drainage	9 September 2020	No response
Summary of comments: No response received.		

Consultee	Date consulted	Date reply received
SCC Flooding Authority	9 September 2020	16 September 2020
<p>Summary of comments:</p> <p>Recommend a holding objection because the proposed drainage strategy does not sufficiently incorporate sustainable drainage principles as part of the development. Policy SCLP9.6 of the Final Draft Suffolk Coastal Local Plan states that sustainable drainage should be integrated into the landscaping scheme and green infrastructure of the development and contribute to the design quality of the scheme. Open SuDS should be delivered wherever possible, and if early consideration is given to the overall surface water drainage strategy associated with this development, it is considered that this is achievable.</p> <p>Notwithstanding the above, the current strategy proposes a large piped network and multiple geo-cellular storage tanks, both of which could potentially be removed through efficient design. An additional consequence of the piped network and geo-cellular storage tanks is the large depth of the attenuation pond and the attenuation swale.</p>		

Consultee	Date consulted	Date reply received
Suffolk County - Highways Department	9 September 2020	24 September 2020
<p>Summary of comments:</p> <p>The A12 is a highly trafficked strategic route linking Ipswich and Lowestoft. In this location it is rural and high speed and whilst the proposal to create a ghost island right turn junction layout is welcomed and necessary due to increased traffic flows (in accordance with DMRB CD123), reassurance that the proposed layout will not be detrimental to highway safety is required prior to determination of the planning application. Therefore, a stage 1 Road Safety Audit will need to be submitted before the Highway Authority can support the proposal. It is also recommended that an existing footway along the A12, 300m south of the site, be extended up to the site to improve links to local public transport and footpath and cycle routes. Further clarification of achievable visibility splays is also required, together with a sensitivity test on the submitted junction modelling to take into account Sizewell C traffic.</p>		

Non statutory consultees

Consultee	Date consulted	Date reply received
Design And Conservation (Internal)	9 September 2020	No response

Summary of comments:

Internal planning consultee. Design and heritage matters covered in Planning Considerations section of this report.

Consultee	Date consulted	Date reply received
Disability Forum	9 September 2020	No response

Summary of comments:

No response received

Consultee	Date consulted	Date reply received
Ecology (Internal)	9 September 2020	No response

Summary of comments:

Internal planning consultee. Ecology matters covered in Planning Considerations section of this report.

Consultee	Date consulted	Date reply received
Head of Environmental Services	9 September 2020	22 September 2020

Summary of comments:

Have reviewed the noise assessment and Phase 1 Contaminated Land report and recommend conditions regarding compliance with the noise report and unexpected contamination as well as a condition requiring the submission of a Construction Management Plan.

Consultee	Date consulted	Date reply received
Suffolk Fire And Rescue Service	9 September 2020	9 September 2020

Summary of comments:

Suffolk Fire and Rescue Authority recommends the installation of a water tank separate from any other form of water system e.g. one forming part of a sprinkler main the use of an existing area of open water as an emergency water supply. The need to comply with Building Regulations regarding access by fire appliances is also noted.

Consultee	Date consulted	Date reply received
Golf England	9 September 2020	No response
Summary of comments: No response received.		

Consultee	Date consulted	Date reply received
Network Rail	9 September 2020	No response
Summary of comments: No response received.		

Consultee	Date consulted	Date reply received
Suffolk County Archaeological Unit	9 September 2020	No response
Summary of comments: No response received.		

Consultee	Date consulted	Date reply received
Suffolk County - Rights Of Way	9 September 2020	8 October 2020
Summary of comments: The proposed site does not contain any public rights of way (PROW), however we would suggest that the following points be considered in terms of green access: <ul style="list-style-type: none"> . Access for cyclists from the site onto the local quiet lanes is made as easy as possible. . The site should have an internal walking route, not just roadways that may be used by pedestrians and motorised traffic. . If the site allows dogs, then it should include an area where guests can let their dogs off lead. 		

Consultee	Date consulted	Date reply received
SCDC Enforcement Team	9 September 2020	No response
Summary of comments: No response received.		

Consultee	Date consulted	Date reply received
Landscape Team (Internal)	9 September 2020	No response
Summary of comments:		

Internal planning consultee. Tree and Landscape matters covered in Planning Considerations section of this report.

Consultee	Date consulted	Date reply received
Suffolk Wildlife Trust	8 September 2020	6 October 2020

Summary of comments:

Holding objection because of the potential for light spill to have a negative impact on the nearby County Wildlife Site which is Ancient Woodland. Important that dark corridors are retained around the site for the foraging and commuting bats. Therefore, a lighting strategy in accordance with current guidelines¹ is required. Also concern that these proposals will result in the degradation of the County Wildlife Site through increased recreational disturbance. Therefore, measures to limit the impacts of this should be detailed within a Landscape and Ecological Management Plan.

Consultee	Date consulted	Date reply received
Network Rail	8 September 2020	No response

Summary of comments:

No response received.

Consultee	Date consulted	Date reply received
SUSTRANS	8 September 2020	No response

Summary of comments:

No response received.

Consultee	Date consulted	Date reply received
Landscape Team (Internal)	8 September 2020	2 October 2020

Summary of comments:

Internal planning consultee. Tree and Landscape matters covered in Planning Considerations section of this report.

Consultee	Date consulted	Date reply received
Golf England	8 September 2020	No response

Summary of comments:

No response received.

Consultee	Date consulted	Date reply received
Anglian Water	8 October 2020	29 October 2020
Summary of comments: It is confirmed foul drainage has available capacity.		

Consultee	Date consulted	Date reply received
Essex And Suffolk Water PLC	8 October 2020	No response
Summary of comments: No response received.		

Consultee	Date consulted	Date reply received
Suffolk Police Designing Out Crime Officer	N/A	14 October 2020
Summary of comments: Make various advisory comments to try to design out crime. It is noted the crime levels in the area are low but still encourage compliance with Secured by Design standards.		

5 Publication

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

Category	Published	Expiry	Publication
Major Application	17 September 2020	8 October 2020	East Anglian Daily Times

6 Planning policy

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that *“where in making any determination under the planning Acts, if regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise”*.

6.2 The National Planning Policy Framework (NPPF) 2019 and National Planning Policy Guidance (NPPG) are material considerations when determining the application.

6.3 The East Suffolk Council – Suffolk Coastal Local Plan was adopted on 23 September 2020 and the following policies are considered relevant:

- Policy SCLP4.5 - Economic Development in Rural Areas
- Policy SCLP6.4 - Tourism Development outside of the AONB
- Policy SCLP6.5 - New Tourist Accommodation

- Policy SCLP7.1 - Sustainable Transport
- Policy SCLP7.2 - Parking Proposals and Standards
- Policy SCLP9.6 - Sustainable Drainage Systems
- Policy SCLP9.7 - Holistic Water Management
- Policy SCLP10.1 - Biodiversity and Geodiversity
- Policy SCLP10.3 - Environmental Quality
- Policy SCLP10.4 - Landscape Character
- Policy SCLP11.1 - Design Quality
- Policy SCLP11.2 - Residential Amenity
- Policy SCLP11.3 - Historic Environment

7 Planning considerations

Principle

- 7.1 The Suffolk Coastal Local Plan recognises that the tourism sector is a substantial and important part of the Districts overall economy. It sets out that the East Suffolk Business Plan and East Suffolk Tourism Strategy and East Suffolk Economic Growth Plan strive to build on the strength of the tourism economy and set out aims for increasing visitor number outside of the main tourist season. It is also recognised that supporting the industry should not be at the expense of the sensitive natural and historic environments that draw people to the area.
- 7.2 Policy SCLP6.1: Tourism, seeks to manage tourism across the District in a way that protects the features that make the District attractive to visitors, and supports facilities where the local road network has the capacity to accommodate the traffic generated from proposals. Proposals which improve the visitor experience and support opportunities for year-round tourism will be supported.
- 7.3 Policy SCLP6.2: Tourism Destinations - supports proposals for tourism development that contribute to the broad appeal, accessibility and year-round nature of destinations across the district and also outlines that tourism proposals should be of the highest standard of design, which protects and enhances the special character and interest of destinations and the distinctiveness of the area.
- 7.4 Policy SCLP6.4: 'Tourism outside of the AONB' considers areas outside of the AONB to play a key role in supporting and facilitating the increase of tourist destinations and accommodation across the District. This policy supports tourism development outside of the AONB where it:
- a) Enhances the long-term sustainability of the area;*
 - b) Is well related to existing settlements;*
 - c) Avoids, prevents or minimises adverse impacts on the natural environment;*
 - d) Is of a scale that reflects the surrounding area;*
 - e) Is of the highest design standards;*
 - f) Minimises light pollution from artificial light sources and ensures the retention of dark skies; and*

g) Demonstrates sustainable aspects of the development during construction and throughout the life of the development. Renewable energy provision is strongly encouraged.

7.5 Policy SCLP6.5: New Tourist Accommodation supports new tourist accommodation where:

- a) The demand or need for tourist accommodation is clearly demonstrated;*
- b) They are of a high standard of design;*
- c) They are of a scale appropriate to the nature of the site and its setting;*
- d) They do not have a material adverse impact on the AONB or its setting, Heritage Coast or estuaries;*
- e) Covered cycle storage, proportionate to the size of the site is provided on site;*
- f) The road network is able to accommodate the volume of traffic generated without having a significant adverse impact on the free flow of traffic and highway safety;*
- g) Ancillary facilities to support the tourist uses are provided on the site where required; and*
- h) Flood adaptation and mitigation measures are included where required.*

7.6 By granting planning permission for the existing High Lodge Leisure development this location has been accepted as being suitable for the provision of tourist facilities, being well related to the principal road network and being outside the more sensitive parts of the District, such as the AONB. The principle issues to consider are whether the proposed expansion of the tourist facilities on site are of a scale appropriate to the nature of the site and its setting; do not have a material adverse impact on the landscape including the nearby AONB; or have adverse ecological impacts; will not result in volumes of traffic that would have a significant adverse impact on the free flow of traffic or highway safety; cause harm to residential amenity; are of a high standard of design; and adopt sustainable drainage, all of which are addressed further below.

7.7 The proposals will support the existing tourism offer locally and provide a year-round facility for visitors as encouraged in the various business plans and tourism strategies referred to above. The proposals are also considered to meet the objectives of policy SCLP4.5: Economic Development in Rural Areas which supports the growth and diversification of the rural economy particularly where it will secure employment locally.

Impact on Landscape and Character of The Area

7.8 Local Plan policy SCLP10.4: Landscape Character indicates 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. The submitted Landscape and Visual Impact Assessment does this and taking into account the site's surrounding landscape qualities concludes that impacts will be negligible once developed.

- 7.9 The Councils Arboricultural and Landscape Manager has been consulted on the proposals. As the site is for the most part very well visually contained, especially in respect of the areas proposed for the actual lodge development, it will have limited visual impact on the wider countryside and will not be seen from the designated AONB. The majority of existing trees are proposed for retention, and adequate clearance is proposed from the Ancient Woodland tree belt to the north of the site. The site already has an established leisure use and therefore its own landscape character is not wholly typical of the prevailing landscape character. The change from golf course to lodge park will change the character of the site itself but this will have negligible impact on wider landscape character, and similarly visual impacts will be very well contained by existing site boundary vegetation. The most visually apparent area will be the western end of the site adjacent to the A12. No lodges are proposed for this area and it is proposed for retention as open space and flood retention provision. Any new planting in this area should reflect and be sympathetic to the prevailing local landscape character. It is considered the indicative landscape masterplan is acceptable and should be the basis for any detailed landscape proposals which will be sought by condition in the event planning consent be granted. The scheme is in accordance with SCLP10.4.
- 7.10 The submitted tree survey and arboricultural impact assessment has been reviewed and considered acceptable. It includes a tree protection plan and method statement, the compliance of which would be controlled by planning conditions.

Transport and Highway safety issues

- 7.11 Policy SCLP7.1: Sustainable Transport indicates that development proposals should incorporate measures to encourage people to travel using non-car modes to access services and facilities. It confirms development will be supported where:
- a) Any significant impacts on the highways network are mitigated;
 - b) It is proportionate in scale to the existing transport network;
 - c) All available opportunities to enable and support travel on foot, by cycle or public transport have been considered and taken;
 - d) It is located close to, and provides safe pedestrian and cycle access to services and facilities;
 - e) It is well integrated into and enhances the existing cycle network including the safe design and layout of new cycle routes and provision of covered, secure cycle parking;
 - f) It is well integrated into, protects and enhances the existing pedestrian routes and the public rights of way network;
 - g) It reduces conflict between users of the transport network including pedestrians, cyclists, users of mobility vehicles and drivers and does not reduce road safety; and
 - h) The cumulative impact of new development will not create severe impacts on the existing transport network.
- The policy also indicates opportunities to improve provision of or access to public transport, in rural and urban areas will be supported.
- 7.12 A Transport Assessment (TA) and Interim Travel Plan have been submitted with the application. The TA indicates that the predicted increase in traffic would not have a material impact on the local road network and that the provision of a ghost island right

turn lane junction layout, whilst not required in capacity terms, will provide some safety benefits given the increase in right turning vehicles. The Highway Authority feel this is necessary and have sought a further safety audit of the layout, which the applicants are undertaking, and an update will be given at the meeting.

- 7.13 Addressing objections that traffic surveys were not undertaken during the summer months, (the applicants indicate this was due to the impact of Covid-19) a sensitivity test of traffic data from previous summer periods is being undertaken. Consideration is also being given to implications on Sizewell C traffic; however, as this has not yet been consented it could not form basis of a refusal of planning permission.
- 7.14 The Highway Authority have also recommended that the footway that exists alongside the A12 from Darsham be extended to the application site to improve links to public transport and the footway and cycle routes. As the submitted Interim Travel Plan (a full Travel Plan will be submitted prior to development opening to public) seeks to encourage the use of public transport for guests and staff and the footway would give access to the nearest bus stop, it is considered there would be merit in this, albeit the applicant has indicated that the cost of providing it would be prohibitive. The footpath would also encourage staff who live locally to walk to work and provide guests with links to nearby public footpaths. Further discussions are taking place on extending the footway and an update will be given at the meeting.

Impact on Residential Amenity

- 7.15 Local Plan policy SCLP11.2: Residential Amenity seeks to safeguard the quality of life of residents within the District by ensuring new development will not cause an unacceptable loss of amenity through, for instance, increased noise and disturbance, loss of outlook, light spillage, loss of privacy or affect air quality or other forms of pollution or safety and security.
- 7.16 A noise assessment has been undertaken by the applicants agent to consider the potential impacts on nearby residents, situated to the south in Hinton Lane and to the west on the A12. It is concluded that with the appropriate thermal glazing of the lodges and the position of the external play areas and acoustic screening of plant and equipment and the distance from nearby houses, the proposals would not cause undue noise disturbance that would be detrimental to residential amenity.
- 7.17 The visual impact of the development to neighbours will be limited given the existing tree and hedging on the site boundaries, and additional planting proposed. Given the position of the vehicular access relative to the A12, adverse impacts from an increase in traffic movements would not adversely impact on nearby residents in terms of increased noise and disturbance.

Ecological Impacts

- 7.18 Policy SCLP10.1: Biodiversity and Geodiversity seeks to conserve and enhance the natural environment. It requires proposals that will have a direct or indirect adverse impact (alone or in-combination with other plans or projects) on locally designated sites of biodiversity or geodiversity importance, including County Wildlife Sites, priority habitats and species, will not be supported unless it can be demonstrated with

comprehensive evidence that the benefits of the proposal, in its particular location, outweighs the biodiversity loss. It also requires new development to secure ecological enhancements as part of its design and implementation and should provide a biodiversity net gain that is proportionate to the scale and nature of the proposal.

- 7.19 Ecological surveys undertaken at the site have identified that it provides habitats for a number of protected species, including at least five species of bat, a low population of grass snake, a low population of common lizard, as well as terrestrial habitat for a low population of great crested newts recorded in offsite ponds to the south. The Council's Ecologist confirms that the measures identified in the Preliminary Ecological Appraisal (PEA) (RPS, July 2020) and the Ecology Survey Report (RPS, August 2020) are adequate to mitigate any likely significant impacts on protected species, and should be secured by conditions in the event planning consent is granted. With regard to the bat survey, information gathered was limited due to equipment failure, it is however considered the site design (including retaining existing suitable habitats and the creation of new habitats) and other identified mitigation measures are considered adequate to maintain (and potentially enhance) the value of the site for bats.
- 7.20 The application site is bounded to the north by Big, Common and Haw Woods County Wildlife Site (CWS), this site is designated for its ancient woodland habitats and is a remnant of the ancient woodland which historically occupied the application site. The proposed development retains and buffers the CWS and therefore the Council's Ecologist considers there should be no direct impacts on the CWS as a result of this proposal.
- 7.21 As recognised in the ecological survey reports and the objection from the SWT, the proposed development has the potential to result in adverse biodiversity impacts (particularly on nocturnal species such as bats) arising from increased external lighting in what is currently a predominantly dark area. Therefore, a lighting strategy should be submitted as part of the application. The applicants have subsequently submitted such a strategy which is currently under review by the Council's Ecologist. Natural England and the SWT have also been consulted and updates will be reported.
- 7.22 The Information to Inform a Habitats Regulations Assessment Report (RPS, August 2020) identifies the relevant European designated sites which need to be considered as part of the HRA. It also provides sufficient information to undertake the required screening and appropriate assessment stages of the assessment. The report identifies that a financial contribution to the Suffolk Coast RAMS is required to mitigate the increased in-combination recreational disturbance impacts that will arise as a result of the development. This contribution will be sought prior to permission being granted. The report does not identify the need for any additional mitigation measures, however given the scale of the proposed development and the size of the site it is considered some on-site provision of walking opportunities should be included in the layout, such as a perimeter path around the site, linking through the proposed area of open space at the western end. The applicant has now included this on the proposed layout.
- 7.23 Thus subject to the lighting strategy being acceptable; the receipt of the RAMS payment; and appropriate controlling conditions, it is considered the scheme will comply with Local plan policy SCLP10.1.

Design

- 7.24 Policy SCLP11.1: Design Quality supports locally distinctive and high-quality design that demonstrates an understanding of the key features of local character. The positioning of lodges and buildings are set within the existing tree belts retaining and enhancing existing landscaping and natural features on site where possible. They include small groups that surround an open space or small water feature. Photographs submitted of other Darwin parks across the country show high quality designs set within well landscaped surroundings. The lodges will be clad in a timber effect cladding with subtle colour choices to work with the trees and landscape. The facilities building has quite a large footprint but is broken down into individual elements incorporating separate asymmetrical pitched roofs to give the appearance of a collection of rural buildings. The single storey scale and choice of materials comprising brick, black boarding and metal cladding, respects the character of the area and the agricultural aesthetic. Parking is provided either alongside the lodges or in grouped parking areas. An average of two parking spaces per unit are proposed together with 53 spaces alongside the facilities building; 14 spaces alongside the maintenance building; and 20 spaces close to the gas compound and sewage pumping station.
- 7.25 The proposed design and layout is considered to be of a high quality and compliant with policy SCLP11.1.

Flood risk and surface water management

- 7.26 The submitted FRA confirms the site is within Flood Zone 1 at low risk of fluvial flooding and that there are no other significant risks of flooding. The Floods Authority have raised a holding objection because the drainage strategy fails to incorporate sustainable drainage principles as required by Local Plan policy SCLP9.6. The applicants are seeking to address this through their drainage consultants and an update will be reported at the meeting.

Other Matters

- 7.27 Following comments made by objectors relating to existing services and utilities, it is confirmed by the applicants agent that the applicants are investing significantly in the following:
- The installation of a new electricity supply;
 - New broadband;
 - New bore hole to enhance water supply;
 - A Foul Water Mains off site connection; and
 - Regarding comments made on the issue of water pressure the applicants state Anglian Water has confirmed that the water supply can be upgraded without detriment to the existing water pressure in the surrounding area.
- 7.28 It is not considered the proposals will have any adverse impact of the setting of nearby heritage assets. There is a listed building directly opposite the site on the A12 and one along Hinton Lane but, given their distance from the site and the intervening trees and hedging that exists, the proposals would not harm the significance of their setting.

- 7.29 The Phase 1 contaminated land report submitted in support of the application, has concluded a very low risk from contamination and therefore no further survey is required, however a condition is recommended to cover the eventuality undiscovered contamination is encountered.

8 Conclusion

- 8.1 Subject to the satisfactory resolution of matters raised by the Highway Authority and Floods Authority and the ecological matters it is considered the expansion of the existing holiday and leisure facility at the site should be supported, helping to diversify the Districts tourism accommodation and contributing to the rural economy and provision of jobs. These are significant public benefits accruing from the development proposal that will also include landscape and ecological enhancements. The proposals will accord with the Development Plan, representing a sustainable form of development.

9 Recommendation

- 9.1 **AUTHORITY TO DETERMINE** with **APPROVAL** being recommended on the satisfactory resolution of highway and drainage issues and ecological matters, including the payment of RAMS, subject to the conditions detailed below.

Conditions:

1. The development hereby permitted shall be begun within a period of three years beginning with the date of this permission.

Reason: In accordance with Section 91 of the Town and Country Planning Act 1990 as amended.

2. The development hereby permitted shall be completed in all respects strictly in accordance with Drawings 1368/13 A0; 1368/9 A0; 1368/11 A1; 1815/HL-014; 1815/HL-010; 1815/HL-015; 1815/HL-019; 1815/HL-016; 1815/HL-011; 1815/HL-018; Transport Assessment; Interim Travel Plan; Flood Risk Assessment and Surface Water Management; Foul Water Drainage Strategy; Arboricultural Survey; Phase 1 Geo-Environmental Site Assessment; Noise Assessment; Landscape and Visual Impact Assessment; Landscaping Masterplan; Preliminary Ecological Appraisal; Ecology Survey Report; Habitats Regulations Assessment (Informative Report); Biodiversity Net Gain Assessment; Supporting Economic Statement, for which permission is hereby granted or in compliance with any conditions imposed by the Local Planning Authority.

Reason: For the avoidance of doubt as to what has been considered and approved.

3. Details of all external facing and roofing materials shall be submitted to and approved by the Local Planning Authority before development commences. Development shall be carried out in accordance with the approved details.

Reason: To ensure the satisfactory external appearance of the development.

4. The lodges and tree houses hereby consent shall only be used for holiday letting accommodation and for no other purpose (including any other purpose in Class C3 of the Schedule to the Town and Country Planning (Use Classes) Order 1987). The duration of occupation by any one person, or persons, of any of the holiday units shall not exceed a period of 56 days in total in any one calendar year, unless the Local Planning Authority agrees in writing to any variation.

The owners/operators of the holiday units hereby permitted shall maintain an up-to-date Register of all lettings, which shall include the names and addresses of all those persons occupying the units during each individual letting. The said Register shall be made available at all reasonable times to the Local Planning Authority.

Reason: To ensure that the development is occupied only as bona-fide holiday accommodation, having regard to the tourism objectives of the Local Plan and the fact that the site is outside any area where planning permission would normally be forthcoming for permanent residential development.

5. None of the trees or hedges shown to be retained on the approved plan shall be lopped, topped, pruned, uprooted, felled, wilfully damaged or in any other way destroyed or removed without the prior written consent of the local planning authority. Any trees or hedges removed, dying, being severely damaged or becoming seriously diseased within five years of the completion of the development shall be replaced during the first available planting season, with trees or hedges of a size and species, which shall previously have been agreed in writing by the local planning authority.

Reason: To safeguard the contribution to the character of the locality provided by the trees and hedgerow.

6. Those trees and hedges to be retained shall be protected during the course of development in accordance with the tree protection plan and method statement within the Tree Survey and Arboricultural Impact Assessment.

Reason: To protect the trees/hedgerow during the course of development in the interest of visual amenity.

7. Within three month(s) of commencement of development, satisfactory precise details of a tree and/or hedge planting scheme (which shall include species, size and numbers of plants to be planted) shall be submitted to and approved in writing by the local planning authority. This shall include details of proposed bunds.

Reason: To ensure the submission and implementation of a well-laid out scheme of landscaping in the interest of visual amenity.

8. The approved tree/shrub planting scheme shall be implemented not later than the first planting season following commencement of the development (or within such extended period as the local planning authority may allow) and shall thereafter be retained and maintained for a period of five years. Any plant material removed, dying or becoming seriously damaged or diseased within five years of planting shall be replaced within the first available planting season and shall be retained and maintained.

Reason: To ensure the submission and implementation of a well-laid out scheme of landscaping in the interest of visual amenity.

9. Development must be undertaken in accordance with the ecological avoidance, mitigation, compensation and enhancement measures identified within the Preliminary Ecological Appraisal (PEA) (RPS, July 2020); the Ecology Survey Report (RPS, August 2020) and the Information to inform a Habitats Regulations Assessment Report (RPS, August 2020) as submitted with the planning application and agreed in principle with the local planning authority prior to determination.

Reason: To ensure that ecological receptors are adequately protected and enhanced as part of the development.

10. No removal of hedgerows, trees or shrubs shall take place between 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check of vegetation for active birds' nests immediately before the vegetation is cleared and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the local planning authority.

Reason: To ensure that nesting birds are protected.

11. No development shall take place (including demolition, ground works, vegetation clearance) until a construction environmental management plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following:
 - a) Risk assessment of potentially damaging construction activities.
 - b) Identification of "biodiversity protection zones".
 - c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
 - d) The location and timing of sensitive works to avoid harm to biodiversity features.
 - e) The times during construction when specialist ecologists need to be present on site to oversee works.
 - f) Responsible persons and lines of communication.
 - g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
 - h) Use of protective fences, exclusion barriers and warning signs.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

Reason: To ensure that ecological receptors are adequately protected as part of the development.

12. A landscape and ecological management plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority prior to first occupation of the development. The content of the LEMP shall include the following:
 - a) Description and evaluation of features to be managed.
 - b) Ecological trends and constraints on site that might influence management.
 - c) Aims and objectives of management.
 - d) Appropriate management options for achieving aims and objectives.
 - e) Prescriptions for management actions.
 - f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
 - g) Details of the body or organisation responsible for implementation of the plan.
 - h) Ongoing monitoring and remedial measures.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.

Reason: To ensure that the long-term ecological value of the site is maintained and enhanced.

13. The development shall not in any circumstances commence unless the local planning authority has been provided with either:
 - a) a licence issued by Natural England pursuant to The Conservation of Habitats and Species Regulations (2017) (as amended) authorising the specified development to go ahead; or
 - b) a statement in writing from the relevant licensing body to the effect that it does not consider that the specified development will require a licence.

Reason: To ensure that the legislation relating to protected species has been adequately addressed as part of the implementation of the development.

14. No development shall commence until a detailed Construction Management Plan has been submitted to, and approved by, the Local Planning Authority. This should contain information on how noise, dust, and light will be controlled so as to not cause nuisance to occupiers of neighbouring properties, and shall set out hours of construction/activity on site and delivery hours and routes for materials and equipment to the site before and during construction. Thereafter the approved construction statement shall be adhered to throughout the construction of the development.

Reason: To reduce the potential impacts of noise pollution and additional vehicular movements during the construction phase of the development.

15. The agreed noise levels, and/or noise mitigation work, should be validated prior to first occupation. A validation report should therefore be submitted to, and approved in writing by, the LPA prior to any occupation or use of the approved development. The validation report must include, but is not limited to:- Results of surveying and/or monitoring carried out to demonstrate that the measures in the approved noise report have been implemented and any agreed noise levels achieved.

Reason: In the interests of residential amenity.

16. In the event that contamination which has not already been identified to the Local Planning Authority (LPA) is found or suspected on the site it must be reported in writing immediately to the Local Planning Authority. Unless agreed in writing by the LPA no further development (including any construction, demolition, site clearance, removal of underground tanks and relic structures) shall take place until this condition has been complied with in its entirety.

An investigation and risk assessment must be completed in accordance with a scheme which is subject to the approval in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and conform with prevailing guidance (including BS 10175:2011+A1:2013 and CLR11) and a written report of the findings must be produced. The written report is subject to the approval in writing of the Local Planning Authority.

Where remediation is necessary a detailed remediation method statement (RMS) must be prepared, and is subject to the approval in writing of the Local Planning Authority. The RMS must include detailed methodologies for all works to be undertaken, site management procedures, proposed remediation objectives and remediation criteria. The approved RMS must be carried out in its entirety and the Local Planning Authority must be given two weeks written notification prior to the commencement of the remedial works.

Following completion of the approved remediation scheme a validation report that demonstrates the effectiveness of the remediation must be submitted to and approved in writing by the LPA.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

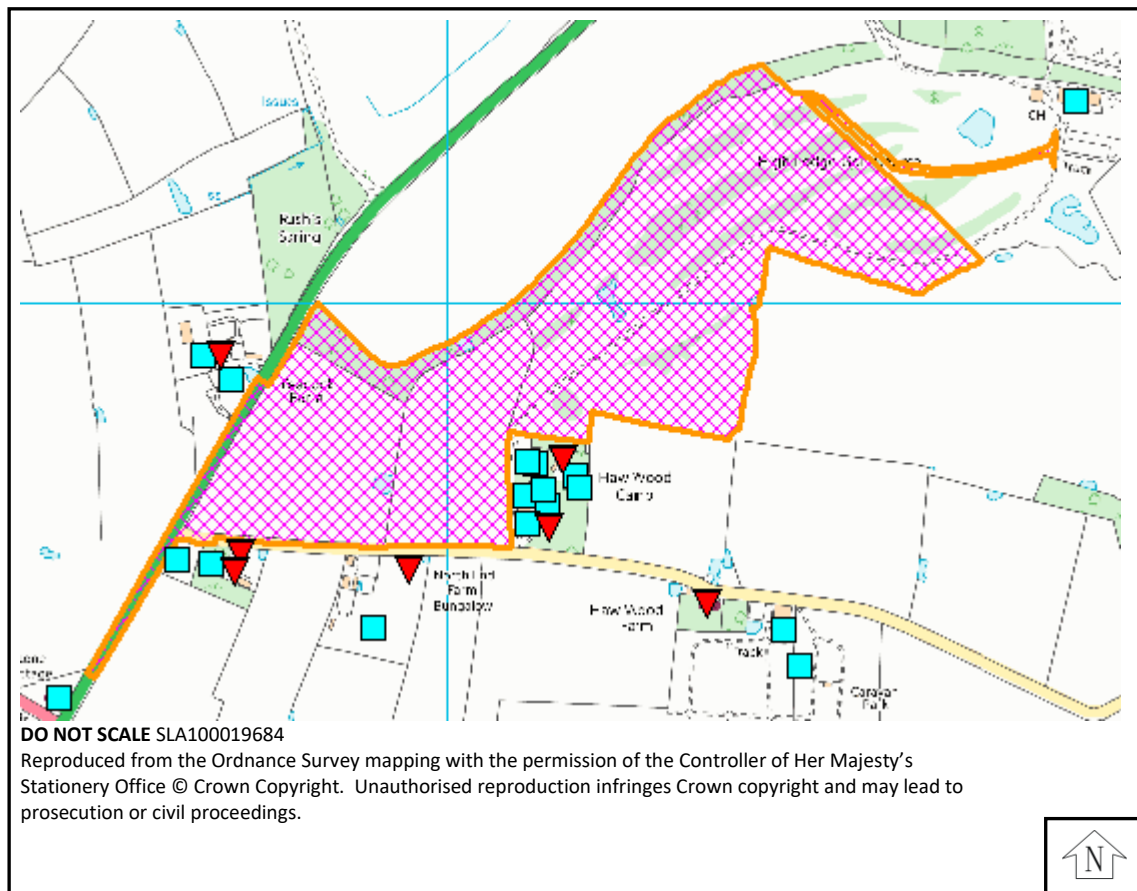
17. Conditions relating to surface water drainage as recommended by the Floods Authority following the consideration of further information to be submitted.
18. Conditions recommended by the Highway Authority following consideration of further information to be submitted.
19. The use shall not commence until the areas within the site shown on the approved plans for the purpose of loading, unloading, manoeuvring and parking of vehicles has been provided. Thereafter the areas shall be retained and used for no other purpose.

Reason: To ensure that sufficient space for the on site parking of vehicles is provided and where on-street parking and manoeuvring would be detrimental to highway safety to users of the highway.





Background Papers

See application reference DC/20/3142/FUL on [Public Access](#)

Map



Key

-  Notified, no comments received
-  Objection
-  Representation
-  Support