



Committee Report

Planning Committee South - 27 October 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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Authorising Officer Katherine Scott, Development Management Team Leader – South Team

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 0EQ.
- 1.2. 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.
- 1.3. 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.

- 1.4. The application was due to be presented to the planning committee on 21st July 2020, however, prior to the meeting, the chair of the Planning Committee choose to defer the item to enable members to visit the site. The visit was considered necessary to allow members to understand the landscape context and due to concerns regarding there being insufficient information regarding the heights and route of the rope course within the application submission.
- 1.5. No further details regarding the route of the rope course and associated heights have been submitted since the application was deferred to enable the visit.
- 1.6. A site visit with members was undertaken on the 7th October 2020.

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, subsequently varied under DC/18/2956/VOC and DC/19/1532/VOC) for a 70-space caravan and campsite and the campsite is now open for tents, caravans and motorhomes. Of those 70 pitches, no more than 43 caravans are permitted to be on site at any one time; no caravans are permitted to be on pitches 33-36, 1-6 or 68-70 (as shown on approved plan LDSP 1158.01A) due to potential impact on the landscape and character of the area. There shall be no use of the site for caravans or camping between 5th November and 1st March each year. There are also 3 glamping pods on site, located adjacent to the entrance/gift shop.

3. Proposal

- 3.1. The proposal at Easton Farm Park is for the construction of a recreational lake over which a low ropes course would be erected. The planning statement suggests that the lake would be 2 metres deep in the centre and the applicant has confirmed that the lake will hold about 1340 cubic metres.
- 3.2. Despite requests from officers for further information, the application lacks details regarding the route of the rope course within the lack and details regarding heights of the poles, platforms etc.
- 3.3. The only details in respect of this matter are within an email from the agent submitted on the 13th July 2020, which shows an example of the posts to be used for the water ropes course and states "this is a 6m pole which will be the height of the poles used above the water level. The poles will actually be 6.5m above the water level but the water level will be at least 50cms below ground level."

- 3.4. A reception building would be constructed of timber clad with a Perspex sheeted roof which would contain the main reception, two stores which would hold the buoyancy equipment and two changing rooms. The building would be sited adjacent to the lake.
- 3.5. The application has been submitted by Mr B Emley of Treerunners, not the owners/operators of Easton Farm Park. They have completed the appropriate ownership certificate declarations.
- 3.6. The following extract is taken from the planning statement in respect of the requirement for the proposal:

"The Farm Park has been looking at ways to further develop the facilities offered on the site. To this end they are partnering with Ben Emley of Treerunners, one of the first companies in the country to offer high ropes courses and who are based in Andover. Treerunners opened in March 2012 and is popular with schools, scout groups and families using zip lines, snowboards and Tarzan swings amongst other challenges to get participants from tree to tree."

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
<p>Summary of comments: We have reviewed the submitted documents and have no comment to make on this application.</p>		

Consultee	Date consulted	Date reply received
Suffolk County Archaeological Unit	6 March 2020	17 March 2020
<p>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.</p>		

Non statutory consultees

Consultee	Date consulted	Date reply received
Landscape Team (Internal)	N/A	15 April 2020
<p>Summary of comments: Comments received and are incorporated into the Officer's report; full comments are available on the Council's website.</p>		

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

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

Consultee	Date consulted	Date reply received
Ecology (Internal)	6 March 2020	2 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
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.		

Consultee	Date consulted	Date reply received
Environmental Protection (Internal)	6 March 2020	20 March 2020
Summary of comments: The Environmental Protection Team's has no comments to make.		

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

5. Planning policy

5.1. 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.

5.2. East Suffolk Council's Development Plan, as relevant to this proposal, consists of Suffolk Coastal Local Plan, Adopted September 2020. There is no 'made' Neighbourhood Plan relating to this area of the district.

5.3. The relevant policies of the Suffolk Coastal Local Plan, Adopted September 2020 are:

Policy SCLP3.2 - Settlement Hierarchy (Suffolk Coastal Local Plan, Adopted September 2020)

Policy SCLP3.3 - Settlement Boundaries (Suffolk Coastal Local Plan, Adopted September 2020)

Policy SCLP4.5 - Economic Development in Rural Areas (Suffolk Coastal Local Plan, Adopted September 2020)

Policy SCLP4.7 - Farm Diversification (Suffolk Coastal Local Plan, Adopted September 2020)

Policy SCLP6.1 - Tourism (Suffolk Coastal Local Plan, Adopted September 2020)

Policy SCLP6.2 - Tourism Destinations (Suffolk Coastal Local Plan, Adopted September 2020)

Policy SCLP6.4 - Tourism Development outside of the AONB (Suffolk Coastal Local Plan, Adopted September 2020)

Policy SCLP7.1 - Sustainable Transport (Suffolk Coastal Local Plan, Adopted September 2020)

Policy SCLP7.2 - Parking Proposals and Standards (Suffolk Coastal Local Plan, Adopted September 2020)

Policy SCLP9.5 - Flood Risk (Suffolk Coastal Local Plan, Adopted September 2020)

Policy SCLP11.1 - Design Quality (Suffolk Coastal Local Plan, Adopted September 2020)

Policy SCLP10.1 - Biodiversity and Geodiversity (Suffolk Coastal Local Plan, Adopted September 2020)

Policy SCLP10.2 - Visitor Management of European Sites (Suffolk Coastal Local Plan, Adopted September 2020)

Policy SCLP10.4 - Landscape Character (Suffolk Coastal Local Plan, Adopted September 2020)

Policy SCLP11.2 - Residential Amenity (Suffolk Coastal Local Plan, Adopted September 2020)

Policy SCLP11.4 - Listed Buildings (Suffolk Coastal Local Plan, Adopted September 2020)

Policy SCLP11.7 - Archaeology (Suffolk Coastal Local Plan, Adopted September 2020)

6. Planning considerations

- 6.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that an application should be determined in accordance with the Development Plan, unless material considerations indicate otherwise. Since the submission of the application, the Local Plan for the former Suffolk Coastal area was adopted on the 23rd September 2020, replacing the former Core Strategy and Site Allocations and Area Specific Policies DPD. This application will therefore be assessed against the adopted policies at the point of decision making, which are the Local Plan Policies as outlined above.
- 6.2. 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 proposal against.

Principle of Development

- 6.3. As noted above, the site lies outside of any settlement boundary and is therefore in the countryside for planning purposes. In such locations, proposals that grow and diversify the rural economy, particularly where this will secure employment locally, enable agricultural growth and diversification and other land based rural businesses, will be supported. In accordance with Local Plan Policy SCLP4.5, proposals will be supported where:

- a) They accord with the vision of any relevant Neighbourhood Plan in the area;*
- b) The scale of the enterprises accords with the Settlement Hierarchy;*
- c) The design and construction avoids, or adequately mitigates, any adverse impact on the character*

of the surrounding area and landscape, the AONB and its setting or the natural or historic environment;

d) Small scale agricultural diversification schemes make good use of previously developed land; and

e) The proposed use is compatible with the surrounding employment uses in terms of car parking, access, noise, odour and other amenity concerns.

All proposals will be expected to provide additional community, cultural or tourism benefits where opportunities exist."

6.4. Additional information from the agent on the 17th July 2020 confirmed that the development would provide employment for the local community (approximately eight to ten members of staff to fill in reception and course instructor roles). As noted above, there is currently no adopted neighbourhood plan policies to consider. The scale of development is considered acceptable when assessed against the existing uses on site. The proposal would be a small-scale agricultural diversification, however is located on an existing horse paddock, rather than previously developed/brownfield land. Given the current uses on site, there are no concerns in respect of highways (including parking), noise, odour or any other amenity concerns.

6.5. Local Plan Policy SCLP4.7 (Farm Diversification) further supports proposals for farm diversification, where farming activities remain the predominate use on the site and where the diversification supports the retention or creation of jobs associated with the farm.

6.6. In accordance with SCLP6.1, proposals which improve the visitor experience and support opportunities for year-round tourism will be supported where increased tourism uses can be accommodated. Tourism development outside of the AONB (SCLP6.4) will be supported where it:

"a) Enhances the long-term sustainability of the area;

b) Is well related to existing settlements;

c) Avoids, prevents or mitigates adverse impacts on the natural environment and on local landscape character;

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."

6.7. Tourism development outside of the AONB should be directed to locations which are well related to the existing settlements and will need to demonstrate good connectivity with existing amenities, services and facilities, and promote walking and cycling opportunities. Whilst the site is located in the countryside, the proposal would be on part of existing attraction site in Suffolk. No details of floodlighting have been submitted alongside the proposal for consideration, which would comply with the above policy.

- 6.8. However, SCLP4.5(c), SCLP6.4(c) and SCLP4.7(d) all require any new proposals to avoid, or adequately mitigate any adverse impact on the character of the surrounding area and landscape.

Landscape & Ecological Impact

- 6.9. Local Plan Policy SCLP10.4 states 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).
- 6.10. 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.

- 6.11. 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.
- 6.12. 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 of 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."

- 6.13. 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.
- 6.14. 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.
- 6.15. It is noted that the consented campsite to the north of the proposed development does already have an impact on this sensitive landscape; albeit restricted occupation periods (no caravans or camping between 5th November and 1st March) to prevent impact to the landscape where natural vegetation landscaping would be reduced through Autumn/Winter months.
- 6.16. Additional landscaping was consented to help mitigate the impact which 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.
- 6.17. 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)."
- 6.18. 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 or identified quality in the development plan).
- 6.19. 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.
- 6.20. Furthermore Local Plan Policy SCLP10.4 confirms that 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.

Biodiversity and Geodiversity

- 6.21. Development will be supported where it can be demonstrated that it maintains, restores or enhances the existing green infrastructure network and positively contributes towards biodiversity and/or geodiversity. The proposed lake is to be located in an area currently used as a 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. As such, the Council's ecologist has not raised any objection to the principle of the proposal. However, notes that 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. The proposal would not be liable for contribution towards Suffolk RAMS.

Highway Safety

- 6.22. Local Plan Policy SCLP7.1 - Sustainable Transport 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 Local Plan Policy SCLP7.1 and SCLP7.2 (Parking Proposals and Standards).

Flood & Water

- 6.23. Local Plan Policy SCLP9.5 (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.
- 6.24. 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.

Archaeology

- 6.25. This site lies in an area of archaeological potential recorded on the County Historic Environment Record (HER), in an area which is topographically favourable for occupation, overlooking the River Deben on a south facing slope. It is located within Easton Farm Park (HER ref ETN 015), which includes historic farmstead (ETN 044). To the south east in a similar location to this site utilising the River Deben is designated moated site at

Letheringham Hall (National Heritage List for England reference 1009644, HER ref LRM 001) and Letheringham Water Mill (LRM 006). As a result, there is high potential for the discovery of below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.

- 6.26. In accordance with SCLP11.7, an archaeological assessment proportionate to the potential and significance of remains must be included with any planning application affecting areas of known or suspected archaeological importance to ensure that provision is made for the preservation of important archaeological remains. Whilst no archaeological assessment has been submitted with the application, Suffolk County Council Archaeological Service considers that there are no grounds to consider refusal of permission in order to achieve preservation in situ of any important heritage assets.
- 6.27. However, in accordance with the National Planning Policy Framework (Paragraph 199), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

Other matters

- 6.28. Despite requests from officers for further information, the application lacks details regarding the route of the rope course within the lack and details regarding heights of the poles, platforms etc. This lack of information would mean that if permission were to be granted, it would be unclear precisely what was being granted. Therefore, it would make potential future enforcement of compliance with the consent in terms of its appearance extremely difficult, if not nigh impossible.

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 in respect of a course layout; details of the height of the posts have been received, but no further details were 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 the adopted Local Plan 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 Local Plan Policies SCLP4.5(c), SCLP6.4(c), SCLP4.7(d) and 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.

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, the adopted Local Plan 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 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 Local Plan Policies SCLP4.5(c), SCLP6.4(c), SCLP4.7(d) and 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.

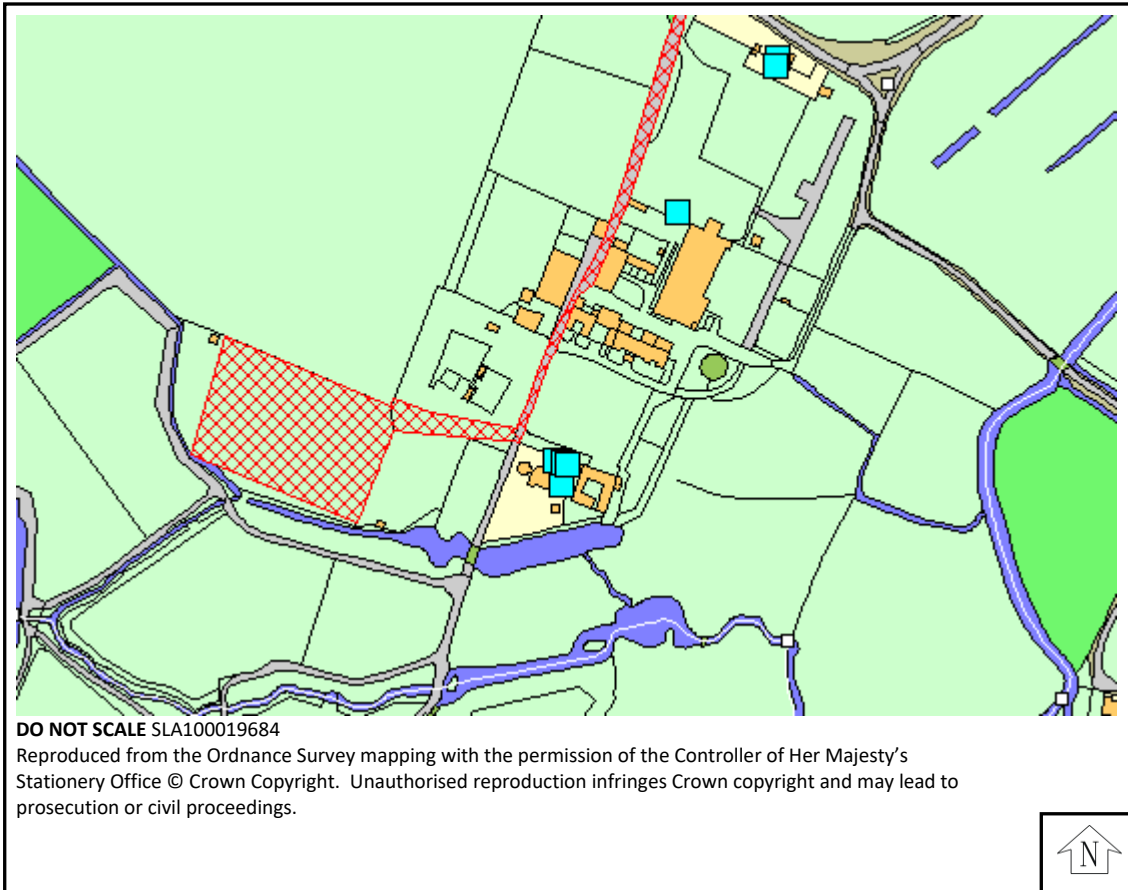
Appendices

Notes of the site visit undertaken on 7 October 2020





Background information

See application reference DC/20/1033/FUL on [Public Access](#)

Map



Key

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