

Committee Report

Item No: 6D

Reference: DC/20/03083

Case Officer: Rose Wolton

Ward: Ganges.

Ward Member/s: Cllr Derek Davis.

RECOMMENDATION – GRANT PLANNING PERMISSION WITH CONDITIONS

Description of Development

Full Planning Application – Conversion, repair, and extension of existing farm buildings to form 5no. dwellings, erection of garage, the demolition of buildings (including the metal clad barn), provision of new vehicular access to The Street and associated landscaping.

NOTE – the application had also initially sought two extra dwellings to replace an existing Dutch barn, this element has now been withdrawn from the application.

Location

Erwarton Hall Farm Yard, The Street, Erwarton, Ipswich Suffolk IP9 1LQ

Expiry Date: 25/08/2021

Application Type: FUL - Full Planning Application

Development Type: Minor Dwellings

Applicant: JRH Veenbaas And Co.

Agent: Boyer Planning

Parish: Erwarton

Site Area: 0.96ha

Details of Previous Committee / Resolutions and any member site visit: Request for Site Visit Denied by Committee on 11.08.2021, and then subsequently allowed and took place on 11.05.2022.

Has a Committee Call In request been received from a Council Member No

Has the application been subject to Pre-Application Advice: Yes (DC/17/05148, DC/19/00990, DC/20/00543 and DC/20/04955).

PART ONE – REASON FOR REFERENCE TO COMMITTEE

The application is referred to committee for the following reason/s:

The Head of Economy considers the application to be of a controversial nature having regard to the planning reasoning expressed by the Parish Council and consultees, as well as the extent and planning substance of comments received from third parties.

PART TWO – POLICIES AND CONSULTATION SUMMARY

Summary of Policies

CN01 - Design Standards
CN06 - Listed Buildings - Alteration/Ext/COU
CR02 - AONB Landscape
CR19 - Buildings in the Countryside - Residential
CS1 - Applying the presumption in Favour of Sustainable Development in Babergh
CS2 - Settlement Pattern Policy
CS15 - Implementing Sustainable Development
HS09 – Affordable Housing
TP15 - Parking Standards - New Development
NPPF - National Planning Policy Framework

Neighbourhood Plan Status

This application site is not within a Neighbourhood Plan Area.

Consultations and Representations

During the course of the application Consultation and Representations from third parties have been received and taken into account. These are summarised below, but Members are directed to read the full contents of all consultation responses and representations received.

A: Summary of Consultations

Parish Council

Erwarton Parish Planning Committee

The Parish request for a site visit to take place with the committee.

The Parish support the proposal in principle.

“We want to see the development achieved in a manner that is considerate of, and sympathetic to the natural environment and our cultural heritage. The proposed plan contains elements of development with which we disagree – these have been outlined in our previous response”.

Elements of the proposed development not supported by the Parish include:

- Inappropriate design

- Two new dwellings were not supported
- Development should be restricted to the footprint of the original brick Victorian buildings
- The additional access is inappropriate.
- The Parish also requests a committee site visit to take place

National Consultee

Suffolk Preservation Society

Objection on the grounds of:

- Suburbanising impact
- Heritage harm
- Loss of tranquillity
- Light pollution and erosion of landscape character
- AONB impact
- Outside of settlement boundary
- The Council can demonstrate a five-year housing land supply

Save England's Heritage

Objection on the grounds of:

- Heritage impact
- Urbanising effect
- Impact to AONB

Historic England

No objection to the retention of the Dutch Barn rather than its replacement with 2no. dwellings.
Have concerns regarding the proposed access track. They state:

“Historic England have reviewed the revised plans and do not object to the retention of the Dutch Barn rather than its replacement with 2 additional dwellings. Although the Dutch Barn is a large structure, its retention would not result in harm to the significance of Erwarton Hall. Its utilitarian nature is in keeping with the character of a farm and it would not result in a harmful alteration to the long ranger viewed from the wider landscape.

The access track still remains in the location proposed and therefore our concerns relating to this element remain. Our previous letters with regards to the track should therefore be taken into account”.

Historic England's previous comments regarding the access track are:

“We note that although the metalled surface of the track has been made less wide, the verge is to be planted and is to be 2m side. The character of this piece of land at the moment is a field and as such contributes to the rural open setting of the Grade II listed Erwarton Hall. A formal access to a development across this field would wholly change this setting and, when viewed from The Street, would make the barn development more dominant in the landscape than the roofline of Erwarton Hall. The eye would be drawn to the barns along the track rather than taking in the wider setting of the Hall.*

*Although we **do not object to** the principle of the conversion of the barns, we remain concerned with the new access track...”.*

County Council Responses

SCC Highways

No objection, subject to conditions.

SCC Public Rights of Way

No objection. Informatives provided.

SCC Floods and Water Management

Informative comments.

SCC Fire and Rescue

Informative comments

SCC Archaeology

No objection, subject to conditions.

Internal Consultee Responses**BMSDC Heritage**

No objection, subject to conditions. The officer identifies no harm.

Place Services – Heritage

Do not object in principle. Have concerns regarding the glazing and new openings in the barns, as well as the materials. The materials can be secured via condition.

“Some level of less than substantial harm” has been identified.

Place Services – Ecology

No objection, subject to securing:

- a) A proportionate financial contribution towards visitor management measures for the Stour and Orwell Estuaries SPA/Ramsar
- b) Ecological mitigation and enhancement measures

This follows the submission of an up-to-date ecological addendum.

Dedham Vale and Stour Valley AONB Project Officer

Concerns regarding:

- Outside of settlement boundary
- Public interest/benefit not demonstrated
- Proposal creates more visually dominant development
- Secondary access should be moved closer to the hedge line

Welcome the removal of the external lighting.

Environmental Health – Noise/Light/Smoke/Odour

No objection in principle. Some concerns regarding potential impact to residential amenity of future occupants of the barns, and therefore, conditions are recommended to minimise any impact.

Environmental Health – Land Contamination

No objection

Strategic Housing

A commuted sum of £151,872 is required for affordable housing contribution.

B: Representations

At the time of writing this report at least 103 letters/emails/online comments of objection and 1 letter of support have been received in total. The total number of letters of objections were received from 40 individuals and/or properties. A verbal update shall be provided as necessary.

Views are summarised below:-

- Increased traffic
- Inappropriate design
- Harm to Listed Buildings
- Overbearing
- Harm to the setting of Listed Buildings
- Unsympathetic
- No public benefit
- Inappropriate location
- Landscape impact
- Unsustainable location
- Archaeological impact
- Threatens rural character
- Sets a precedent for future development in this area
- Inappropriate landscaping
- Not enough planting/greenery
- Inadequate access
- Affects to local ecology/wildlife
- Conflict with District Plan
- Conflict with NPPF
- Development too high
- Dominating
- Inappropriate in Conservation Area
- Loss of outlook
- Loss of privacy
- Overdevelopment
- Overlooking
- Out of character
- Building work
- Light pollution
- Inadequate public transport provision
- Noise
- Inappropriate scale

(Note: All individual representations are counted and considered. Repeated and/or additional communication from a single individual will be counted as one representation.)

PLANNING HISTORY

REF: DC/18/02062	Planning Application. Conversion and restoration of existing redundant farm buildings to form 5 new dwellings.	DECISION: WDN 03.08.2018
REF: DC/19/02206	Planning Application. Conversion of farm buildings to form 3no dwellings including demolition of later Dutch barn. Erection of 2no contemporary barns(Dwellings).	DECISION: REF 21.06.2019
REF: B/0495/78/FUL	Change of use of part of ground floor of dwelling for display and sale of antique furniture.	DECISION: GRA 11.10.1978
REF: B/17/00515	Erection of extension to agricultural storage building	DECISION: GRA 11.05.2017
REF: B/78/00495	Change of Use pf part of ground floor of dwelling for display and sale of antique furniture Created by CS as part of the S106 project. This application has a Section 106 agreement with it	DECISION: GRA 11.10.1978
REF: B//86/00212	THE RETENTION OF HOUSEKEEPERS COTTAGE AND REBUILDING AND EXTENSION OF A FURTHER OUTBUILDING TO FORM PRIVATE SWIMMING POOL, GYMNASIUM, CONSERVATORY AND DOUBLE GARAGE	DECISION: GRA
REF: B/LB/86/80049	APPLICATION FOR LISTED BUILDING CONSENT - THE RETENTION OF HOUSEKEEPERS COTTAGE AND BUILDING AND EXTENSION OF A FURTHER OUTBUILDING TO FORM PRIVATE SWIMMING POOL, GYMNASIUM, CONSERVATORY AND DOUBLE GARAGE	DECISION: GRA 28.05.1986
REF: B/LB/93/00637	APPLICATION FOR LISTED BUILDING CONSENT - INTERNAL AND EXTERNAL ALTERATIONS	DECISION: GRA
REF: B//94/01203	ERECTION OF GRAIN STORE AND CAPPING OF WALL ADJOINING HIGHWAY (EXISTING STRUCTURE TO BE REMOVED)	DECISION: REF
REF: B//95/00008	ERECTION OF GRAIN STORE (EXISTING STRUCTURE TO BE REMOVED)	DECISION: GRA 16.02.1995

PART THREE – ASSESSMENT OF APPLICATION

1.0 The Site and Surroundings

- 1.1. The application site is located within the countryside, approximately 550 metres from the village of Erwarnton, and approximately 450 metres from the village of Shotley. The site is known as Erwarnton Hall Farmyard and is located along The Street, outside of the built-up area boundary of Erwarnton or any of the surrounding villages.
- 1.2. The site is currently identified as having agricultural use; however, many of the buildings have been redundant for some time, with many in a state of disrepair or altered from their original form. It should be noted that many of the buildings on site are used for the keeping of and caring for horses. The buildings range from 19th and 20th Century, with all but the 19th Century barns to be demolished as part of this proposal. There is a 20th Century Dutch barn to be retained, as well as a modern steel-clad barn which is due for demolition and is considered to be visually intrusive on the site. There are neighbouring properties located to the west, and on the opposite side of the road to the north. To the west is the Grade II* listed Erwarnton Hall, and its Grade I listed Gatehouse, which are of important historic significance. Grade II* buildings are of important historic significance and are considered to be of more than special interest; 6% of listed buildings in the country share this Grading. Grade I listed buildings are considered to be of exceptional interest; and only 2.5% of listed buildings in the country share this Grading. The application site is a farmstead property that was originally associated with Erwarnton Hall, and the 19th Century barns subject of this application are non-designated heritage assets of historic significance. The site is also located within an AONB (Area of Outstanding Natural Beauty) landscape.

2.0 The Proposal

- 2.1. The proposal seeks the conversion, repair and extension of the existing farm buildings to form five dwellings, as well as the erection of garages, the demolition of the metal clad barn, and the provision of a new vehicular access to The Street and associated landscaping.
- 2.2. This is a full application, with no matters reserved. The proposal would consist of 1no. 2-bedroom dwelling, and 4no. 3 bedroom dwellings. The dwellings would have a range of garden sizes and two of the properties would have detached garages. The site area is approximately 0.96 hectares, and the 19th Century barns which form the north, east, and west boundaries would be repaired, converted and extended, with the metal clad barn being demolished and the Dutch barn to the south of the site to be retained. There is an existing access through the centre of the site, which is 2 metres wide. There would be a new vehicular access created on the eastern side of the site, across an existing grass paddock area, which would lead to an existing opening in the courtyard of the buildings. There would be planting of native trees and hedging along the highway boundary to help screen the access driveway.

3.0 The Principle of Development

- 3.1. The site is located outside the built-up area boundary of any of the surrounding villages and is identified as being located within the countryside. The proposal involves the conversion of redundant agricultural barns to residential use. Policy CR19 of the Babergh Local Plan allows for agricultural barns located within the countryside to be converted to residential use, subject to

meeting certain criteria. This application is not considered to be in accordance with this Policy, due to all alternative uses not being proven to be fully explored and discounted.

The Policy states:

“Proposals for the conversion of barns or other redundant or under used buildings in the countryside into dwellings or holiday accommodation will only be permitted if:

- *It can be demonstrated that the alternative uses for business, community and leisure uses have been explored and can be discounted;*
- *The building’s location makes it unsuitable for conversion to other uses;*
- *The buildings are of architectural or historic merit and is capable of conversion without significant rebuilding or extension;*
- *The method of conversion retains the character of the building and, in the case of barns, retains the single open volume with minimal change;*
- *The scheme is acceptable in terms of highway safety;*
- *The building is not at risk of flooding;*
- *There is scope for connection to a suitable drainage system; and*
- *There is no material adverse impact on protected species, particularly bats and barn owls”.*

Each of the criteria listed above, will be discussed in turn below.

- 3.2. Residential has been put forward as the most optimal and viable use of the buildings; however, evidence of proven viability has not been provided to support this. It is acknowledged that, due to its tranquil and sensitive location, commercial, leisure or business use could have an adverse impact in terms of noise and odour, as well as light pollution and harm to the character and setting of the heritage assets. However, as stated above, no evidence on viability has been submitted in order to support this.
- 3.3. The site is remote from other employment areas; however, it is also remote from any services for residential use. It has not been sufficiently proven that this site in its location only has a viable use for residential.
- 3.4. The barns the subject of this application are considered to be of historic merit, being undesignated heritage assets of historic significance. The structural reports submitted with this application show that the 19th Century barns are capable of conversion, without significant rebuilding; the barns would be extended; however, the extensions are not considered to adversely change the overall appearance of them, but the amount of glazing proposed is a concern and could cause harm to the heritage assets (this is discussed in more detail in the relevant heritage section below).
- 3.5. The method of conversion would largely retain the character of the buildings; however, as stated above, the amount of glazing proposed is a concern, and could cause harm to the heritage assets’ character and setting. The site would remain enclosed by the red brick wall, retaining the farmstead aesthetic, however, the additional access could have an urbanising effect on the farmstead character in a countryside setting.
- 3.6. The scheme is acceptable in terms of highway safety. During the course of determination, the SCC Highway Authority was consulted and raised no concerns on highway safety or efficiency grounds. Further details of this are included in Section 5 below.
- 3.7. The buildings are not at risk from flooding, The site is located within Flood Zone 1 where there is a limited potential for flooding and a limited history.

- 3.8. There is scope for a suitable drainage system, through a wastewater treatment plant.
- 3.9. There would be no material adverse impact on protected species. During the course of determination Place Services – Ecology was consulted and raise no objection to this scheme. Sufficient mitigation measures are proposed and secured via condition. It is acknowledged that during the course of determination, the Ecology documents did run out of date; however, to rectify this, an addendum was submitted on 26.04.2022 and this states that the 2022 survey that was undertaken shows no change to the biodiversity of the site, or the protected species found. The mitigation measures, therefore, are the same as previously proposed, and secured via condition.
- 3.10. Paragraphs 3.2, 3.3, 3.4 and 3.5 detail the reasons why this proposal is not considered to be fully in accordance with Policy CR19 of the Babergh Local Plan (2006).
- 3.11. The two new dwellings have now been omitted from the proposal, and the development comprises conversion and extension of the existing barns only.
- 3.12. The site is located within the countryside and Policy CS2 of the Babergh Core Strategy (2014) requires development to only be permitted in a countryside setting in exceptional circumstances, subject to proven and justified need. Policy CS15 of the Babergh Core Strategy (2014) seeks to identify whether the location is sustainable and appropriate for development. This proposal fails on parts iv) and xviii) of that Policy due to its location not being within a safe walking distance of any services.
- 3.13. As the site is located outside of the Built-Up Area Boundary of any nearby settlement, the proposal is not considered to be in accordance with Policy CS2, the limited public benefits arising from this scheme are not considered to outweigh this. In terms of Policy CS15, the proposal fails on parts i), iv) and xviii).

Part i) states:

“Respect the landscape, landscape features, streetscape/townscape, heritage assets, important spaces and historic views”.

As discussed in more detail below in the relevant landscape and heritage sections, the proposal causes harm to the character of the AONB through causing an urbanising effect on the farmstead aesthetic of the site, as well as causing harm to the character and setting of the neighbouring Grade II* and Grade I listed buildings, and the non-designated heritage assets of the barns themselves.

Part iv) states:

“Ensure an appropriate level of services, facilities and infrastructure are available or provided to serve the proposed development”.

The site is remote from any established settlement and the services that accompanies them, therefore, creating a heavy reliance on the use of private motor vehicles to access basic services, such as shops, schools, pubs and healthcare facilities. The proposal does not provide any services and does not enhance access to services.

Part xviii) states:

“Seek to minimise the need to travel by car using the following hierarchy: walking, cycling, public transport, commercial vehicles and cars, thus improving air quality”.

The need for using cars would not be minimised from this proposal, the roads leading away from the site are typified by being narrow and unlit, with no footpaths, and are unsuitable and undesirable for pedestrians. There is also no provision for public transport in the vicinity or within walking distance, thus creating a heavy reliance on the use of private motor vehicles.

3.14. This is where Paragraph 80 of the NPPF (2021) is relevant. The Paragraph states:

“Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:

- a) There is essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near to their place of work in the countryside.*
- b) The development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets.*
- c) The development would re-use redundant or disused building and enhance its immediate setting.*
- d) The development would involve the subdivision of an existing residential building; or*
- e) The design is of exceptional quality...”*

3.15. Paragraph 80 of the NPPF (2021) is considered to be relevant to this case, because although the site is not isolated from other dwellings and buildings, it is isolated from any settlements and therefore, can be considered as isolated homes in the countryside. Part c) of the Paragraph is relevant in this case and is discussed in detail below. Although the proposal could help to secure the future of the undesignated heritage assets, the proposed residential use has not been proven to be the most optimal and viable use through the submission of any evidence or viability statements. Therefore, part b) is not considered relevant in this case.

Part c) is relevant because the proposal does re-use redundant and disused buildings, which in part enhances the immediate setting. The demolition of the metal clad barn assists in enhancing the setting of the area; however, retaining the Dutch barn at the rear and the inclusion of the large amount of glazing and driveway is not considered to protect or enhance the setting. Therefore, the proposal is not considered to be in accordance with this Paragraph.

3.16. The principle of the development is not considered acceptable due to the potential harm that the proposal could cause to the adjacent Grade II* and Grade I listed buildings, the undesignated heritage assets barns subject of the application, and the AONB landscape. The limited public benefits arising from this scheme are not considered to outweigh this harm, as well as the harm caused by the proposal being in an unsustainable location.

3.17. It should be noted that a similar application was previously refused on this site. The application reference number is DC/19/02206 and was a planning application for “the conversion of farm buildings to form 3no. dwellings including demolition of later Dutch Barn; Erection of 2no. contemporary barns (dwellings)”. This application was refused for the following reasons:

- 1. The proposal would result in less than substantial harm to the heritage assets because the conversion of the existing barns and construction of two new builds would detract from the setting of the Grade II* Listed Erwarton Hall and Gatehouse. This would harm their significance because the scheme is poorly laid out, insensitively detailed and is domestic in character which give rise to a suburbanising effect which is out of keeping in this rural location within an Area of Outstanding Natural Beauty. Therefore, the application does not meet the requirements of Section 66 of the Planning (Listed Buildings and Conservation Area) Act 1990. The proposal conflicts with policies CN01, CN06, CR02, CR19 of the Babergh Local Plan (2006) and policies CS01, CS15 of the*

Babergh Core Strategy (2014). These policies are consistent with paragraphs 8, 127, 130, 172, 192, 194 and 196 of the National Planning Policy Framework (2019).

- 2. Policy CS2 of the Babergh Core Strategy (2014) states that planning permission will be permitted in the Countryside only in exceptional circumstances subject to proven and justifiable need. CS15 requires new development to demonstrate how the proposal addresses the key issues and objectives identified in the Core Strategy. No supporting evidence has been provided that justifies the need for the proposal, and that the site is a sustainable location. As a result, the proposal does not accord with policies CS2 and CS15. Whilst paragraph 11 of the NPPF provides a presumption in favour of sustainable development, it is necessary to consider whether any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or specific policies in this Framework indicate development should be restricted. The assessment of the application has identified that the proposal does not comply with the development plan and, notwithstanding that the Council does not have a five-year housing land supply, it is considered that the unsustainable location, in relation to its connectivity to services and facilities, significantly and demonstrably outweigh the benefits of the development when considered against the Framework as a whole.*
- 3. Proposals with site areas greater than 0.5 hectares are subject to a 35% affordable housing contribution. The application site is 0.81 hectares and is therefore liable for affordable housing. No such contribution has been offered or secured, and so the requirements of Policy CS19 of the Babergh Core Strategy have not been met nor the aims of the Planning Policy Framework (2019), in particular paragraphs 77 and 79.*
- 4. Safe and suitable access cannot be evidenced, the existing access cannot adequately facilitate the intensification of use that would be created by the proposal.*

Speed survey results denote 85th %ile speeds of 27.5mph and 28mph meaning splays of x=2.4m by y=59m in each direction, to the nearside edge of the metalled carriageway with no obstruction over the height of 0.6m and must encroach 3^d party land.

Splays of x=2.4m by y=19m (to the West) and y=25m (to the East) have been measured, which fall 34m and 40m short. Therefore, the proposal conflicts with policies TP15 and CR19 of the Babergh Local Plan (2006) and with the aims of paragraph 109 of the National Planning Policy Framework.

- 5. We are not satisfied that sufficient ecological information is currently available for determination of this application. This is because the Ecological Survey Report has recommended that bat emergence and re-entry surveys are required to assess the extent of which bat species will be affected by the proposed development.*

These surveys are required prior to determination because paragraph 99 of the ODPM Circular 2005 highlights that: "It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision."

Consequently, these further surveys are required to provide the LPA with certainty of impacts on legally protected and Priority species and enable it to demonstrate compliance with its statutory duties, including its biodiversity duty under s40 NERC Act 2006.

Therefore, this proposal is considered to conflict with policy CR19 of the Babergh Local Plan (2006) which is consistent with the aims of National Planning Policy Framework paragraph 175.

4.0 Nearby Services and Connections Assessment Of Proposal

- 4.1. The site is not within walking distance of any services. The closest village that has a range of services is Shotley. The village of Shotley is located to the east of the site and is approximately a 3-minute drive from the site, or alternatively a 17-minute walk, albeit along roads that do not have footpaths.
- 4.2. As discussed above, the limited public benefits arising from this scheme are not considered to outweigh the harm of being located in an unsustainable location.

5.0 Site Access, Parking And Highway Safety Considerations

- 5.1 The NPPF identifies at Paragraph 110 that, in assessing specific applications for development, it should be ensured that, *inter alia*, significant impacts on the transport network and highway safety can be cost effectively mitigated to an acceptable degree.
- 5.2. The site has an existing access that runs through the centre, this access would remain in use for this proposal; however, it would see an intensification of use. Therefore, a new vehicular access is proposed on the eastern side of the site across the existing grass paddock. The existing and proposed access is considered to be in accordance with Local Highway Authority standards, to be of an appropriate width and to afford appropriate highway visibility relative to the quantum of the development proposed.
- 5.3. During the course of determination, the SCC Highway Authority was consulted and raised no objection to the proposal, subject to conditions. The conditions relate to the access surface, visibility, parking and manoeuvring, bin storage and presentation, as well as HGV movements and parking. The SCC Highway Authority has deemed the proposed and existing accesses acceptable for use for this proposal and raises no concerns in terms of highway safety or increased traffic.
- 5.4. The proposed site layout shows each dwelling to have sufficient off-road parking provision, which offers more than required under the Suffolk Guidance for Parking (2019). The Guidance identifies that a development such as this one of 1no. 2-bedroom property and 4no. 3-bedroom properties should provide a minimum of 10no. parking spaces; this proposal offers 18no. parking spaces, which is beyond the standard requirement.

6.0 Design And Layout [Impact On Street Scene]

- 6.1. Section 12 of the NPPF refers to design, it provides that good design is a key aspect of sustainable development and should contribute positively to making places better for people. Decisions should aim to ensure that development will function well and add to the overall quality of the area, establish a strong sense of place, create attractive and comfortable places to live, work and visit, optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks. Furthermore, it provides that development should respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation. In addition, Policy CN01 of the Babergh Local Plan provides that “*All new development proposals will be required to be of appropriate scale, form, detailed design and construction materials for the location*” and echo’s the provision of the NPPF.

- 6.2 Additionally, Policy CS15 of the Babergh Core Strategy (2014) requires developments to respect the landscape, landscape features, streetscape/townscape, heritage assets, important spaces and historic views, the proposal is not considered to be in accordance with this Policy ,as discussed above and within the relevant landscape and heritage sections below, the proposal causes harm to the character of the AONB through causing an urbanising effect on the farmstead aesthetic of the site, as well as causing harm to the character and setting of the neighbouring Grade II* and Grade I listed buildings, and the non-designated heritage assets of the barns themselves.
- 6.3. The proposed layout largely retains the farmstead aesthetic of the site through utilising the historic barns and extending them in a way that reflects the agricultural character in the majority. However, the extent of glazing proposed is considered to cause harm to this character, as well as the setting of the adjacent listed buildings, and AONB landscape. Externally, aside from the large amount of glazing, the barns would largely retain their agricultural appearance and would appear single storey. Three of the barns would have a small, converted loft space with an additional bedroom, and one (unit 5) would receive an extension that would mirror the historic Dutch barn style of the building to be demolished in the same location; whilst one of the barns would have all its accommodation at ground-floor level. The previously proposed balconies have been omitted from the plans and instead there would be dormer windows with shutters. The glazing on the barns is proposed to be IQ/Photochromic glazing, which darken on exposure of ultraviolet light (sun light) and would remain dark in the evening times to limit the amount of light spillage. The inclusion of the IQ/Photochromic glazing does somewhat reduce the light spillage at night, but there is still likely to be some element of light spill, although, this would not have an impact on the appearance of the glazing during the daytime. Notwithstanding this, there are still fundamental concerns regarding the amount of glazing proposed and the impact this could have on the character of the buildings. Reducing the amount of glazing would help to retain (as much as possible) the existing and distinct character of the building and the site as a whole.

The two new dwellings have also been omitted from the proposed, and the Dutch barn to the south of the site would remain as existing.

- 6.4. There would be a shared courtyard through the centre of the site, which would be used for access, parking and manoeuvring purposes. Each of the dwellings would have a modestly sized garden. No details of boundary treatments within the site have been provided; however, this could be conditioned. The existing boundary treatments of hedgerows and trees around the perimeter would be retained and enhanced and the private garden spaces would have groups of native tree planting to soften the appearance. On the western boundary, there would be views from the barns to Erwarton Hall, as the existing brick wall is low and is not proposed to be changed.
- 6.5. The proposed new access would also have additional planting along the highway boundary to help soften and screen the appearance of the driveway; however, this would create a new opening in the existing hedgerow along The Street.
- 6.6. The design and layout are not considered cramped or an overdevelopment, as there would be fewer buildings on the site than existing. The heights of the dwellings are also considered to be sympathetic to the surroundings.
- 6.7. The proposed layout is considered to be in accordance with Policy CN01 of the Babergh Local Plan (2006), however, the design of the dwellings, particularly in terms of the materials (glazing and weatherboarding), is not considered to be in accordance with Policy CN01 as it does not retain the distinct character of the historic barns.

7.0 Landscape Impact, Trees, Ecology, Biodiversity And Protected Species

- 7.1. The site is located within an AONB, The Countryside and Rights of Way Act 2000, Part IV, Section 85 requires Local Planning Authorities to have regard to the purpose of conserving and enhancing the natural beauty of the AONB. The design of the proposal has incorporated features to limit the impact on the AONB and these features are largely supported by the Suffolk Coast and Heaths AONB Project Officer who was consulted during the course of determination of this application. The design includes photochromic or IQ glazing to limit light spillage into the AONB, which is supported, and offers planting to help soften the appearance of the development. The design of the proposal also largely retains its agricultural appearance from the roadside. There is some concern regarding external lighting in the courtyard area, as well as along the proposed new vehicular access driveway. The external lighting has been omitted from the proposal, and is therefore, no longer a concern. Although these additions and changes have been made to reduce the impact to the AONB, there is still concern that the proposal could cause an urbanising effect on the site and local area, as well as cumulative light spill, increased noise in a highly tranquil part of the AONB, as well as cutting back the hedgerow.
- 7.2. There is also some concern regarding the proposed new access which has the further potential to urbanise the appearance of the site. Efforts have been made in an attempt to address these concerns by the incorporation of additional planting along the roadside to help screen the driveway and soften the driveway appearance to appear less urban. The additional planting and driveway surface material, however, are not considered to be sufficient to reduce the harm to the AONB to an acceptable standard, as the existing hedgerow will still need to be cut back in order to create the driveway, which disrupts the character along The Street. In addition to this, the paddock where the driveway would be located is considered to be an important cohesive landscape feature within the AONB that also forms part of the setting to Erwarton Hall.
- 7.3. During the course of determination, the Suffolk Coast and Heaths AONB Project officer was consulted. In the officer's latest consultation response, strong concerns were still raised regarding the urbanising effect on the site, as well as light spill and impact to the hedgerow. The officer states:

"The AONB team provided extensive comments on previous interactions of plans for the site. In these we raised concerns about the intensification of the use of the site for residential development, the urbanising effect of the development on the Suffolk Coast & Heaths AONB, the impact on tranquillity from cumulative light spill and increased noise arising from the development in this highly tranquil part of the AONB and impacts on the neighbouring heritage assets of Erwarton Hall and Gatehouse an application submitted in 2019 (ref: DC/19/02206) was refused as it was considered that development would cause harm to the heritage assets by detracting from the setting of the Grade II listed Erwarton Hall and Gatehouse and because of the suburbanising effect the development would have in a rural location within an AONB.*

Even with the proposed changes to the scheme (the retention of the Dutch Barn and removal of unit 6 & 7), the concerns raised previously by the AONB team remain valid for the current proposal. The site sits outside the settlement boundary in open countryside. The 2019 application was also refused as 'the site was considered to be an unsustainable location, in relation to its connectivity to services and facilities'.

In our previous response (26.02.2021), the AONB team raised concerns about the effects of cutting back roadside verges and hedges to meet the required safety splay lines. The AONB team acknowledge the need to satisfy road safety requirements however, meeting and maintaining these splay line, will open up views of the proposed development particularly from the east. Cutting back the roadside hedges to accommodate the splay lines will undermine the effectiveness of the new

landscaping proposed. As a result, the whole development will be more visually dominant within the AONB. This is considered contrary to criteria (i) of Policy CS15.

The AONB team welcome that the lighting proposed along the secondary access to the site has been removed from the scheme. The proposal by Historic England and supported by the AONB team, to move the secondary access closer to the hedge line along The Street has not been addressed in the current scheme. Impacts on the integrity of the paddock as a cohesive landscape feature within the AONB that also forms part of the setting to Erwarton Hall remain unresolved and as such the proposal is not considered to accord with criteria i) of Policy CS15.

Finally, under the amended plans it is proposed to retain the continued equestrian and agricultural activities at the site alongside the proposed residential use. The site team question if these two uses on the same site are likely be compatible.

The scheme is not considered to accord with Paragraphs 176 or 177 of the NPPF, Policy CR02, or policies CS2 and CS15 of the Core Strategy. It fails against objectives L1, L3 and LUW1 in the Suffolk Coast and Heaths AONB”.

- 7.4. During the course of determination, Place Services Ecology were consulted, and have raised no objection to the proposal subject to securing a proportionate financial contribution towards visitor management measures for the Stour and Orwell Estuaries SPA/Ramsar, as well as ecological mitigation and enhancement measures. The ecology officer states, “we support the proposed compensation measures for bats and reasonable biodiversity enhancements, which have been recommended to secure measurable net gains for biodiversity, as outlined under Paragraph 170(d) & 175(d) of the National Planning Policy Framework 2019”. As discussed above, an addendum has been submitted to show that there are no changes to the biodiversity or ecological value on the site since the previous surveys took place, and therefore the same mitigation measures as previously proposed still apply.

8.0 Land Contamination, Flood Risk, Drainage and Waste

- 8.1. The NPPF, at Paragraph 183, identifies *inter alia* that planning decisions should ensure that a site is suitable for its proposed use. In addition, Paragraph 183 makes clear that, where a site is affected by contamination, the responsibility for securing a safe development rests with the developer and/or landowner.
- 8.2. A Land Contamination Report Assessment (received on 11.08.2021) was submitted with the application, which concludes that there are no notable features present in the context of land contamination other than inert made ground. Council land contamination specialists have assessed the information by the applicant and confirm they are in agreement with the report’s findings that further works on the site with regards land contamination remediation are unwarranted. Further occupants of the development are therefore not considered to be at significant risk from sources of land contamination.
- 8.3. In relation to flood risk and drainage, the NPPF identifies at Para.155 that “...*Inappropriate development in areas at risk from flooding should be avoided by directing development away from the areas at highest risk...*”. In regard to this, it is noted that the entire site for the proposed development is located within flood zone 1. Therefore, the site is not considered liable to unusual flooding events, and in that regard accords with the identified requirements of the NPPF and development plan policy in this regard.

8.4. A drainage strategy has been submitted with this application, which shows that a wastewater treatment plant would be installed and would discharge into the river Stour.

9.0 Heritage Issues [Including The Impact On The Character And Appearance Of The Conservation Area And On The Setting Of Neighbouring Listed Buildings]

9.1. The site is not located within a Conservation Area; however, it is within direct proximity of the Grade II* listed Erwarton Hall, and its Grade I listed Gatehouse; and the barns proposed to be converted on the site are non-designated heritage assets of historic significance.

9.2. In Historic England's latest response (11.04.2022), the officer welcomes the removal of units 6 & 7 and retaining the Dutch barn to the south of the site, there are still concerns raised however, regarding the additional driveway/access track. The Officer states:

"Historic England have reviewed the revised plans and do not object to the retention of the Dutch barn rather than its replacement with 2 additional dwellings. Although the Dutch barn is a large structure, its retention would not result in harm to the significance of Erwarton Hall. Its utilitarian nature is in keeping with the character of a farm and it would result in a harmful alteration to the long range views from the wider landscape.

Historic England have noted our concern relating to the additional access track since our initial comments. The access track still remains in the location proposed and therefore our concerns relating to this element remain. Our previous letters with regards to the track should therefore be taken into account".

9.3. Historic England's previous comments on the access track, which it still objects to, are as follows within its response dated 15.07.2021:

"We note that although the metalled surface of the track has been made less wide, the verge is to be planted and is to be 2m wide. The character of this piece of land at the moment is a field as such contributes to the rural open setting of the Grade II listed Erwarton Hall. A formal access to a development across this field would wholly change this setting and, when viewed from The Street, would make the barn development more dominant in the landscape than the roofline of Erwarton Hall. The eye would be drawn to the barns along the track rather than taking in the wider setting of the Hall.*

Although we do not object to the principle of the conversion of the barns, we remain concerned with the new access track. We consider that the access track should either be repositioned close to the hedge in order to screen it or should be removed from the scheme".

9.4. Our own Heritage Officer had identified no harm. Given these differing views between heritage experts, a third opinion was sought from a different heritage body (Place Services). Its response is below.

9.5. Place Services has not identified no harm, rather it has identified "some level of less than substantial harm". It does not object to the conversion of the dwellings in principle, and recommends some changes to the materials, as well as a reduction in the amount of glazing. The Place Services Heritage Officer does share some concern with Historic England in that the proposed access track will open the field which has remained undeveloped historically. The officer states:

"The historic relationship and close proximity results in the site having a positive contribution to the significance of the listed Hall and Gatehouse. There would inevitably be some level of less than

substantial harm to the significance of Erwarton Hall and Gatehouse arising from this application due to the fundamental changes to the character of the site; changing from a working farm which has a legible agricultural character to residential dwellings with associated domestic landscaping. The function of the site has historically been in agricultural use connected to Erwarton Hall and therefore, this site as existing positively contributes to the setting of the heritage assets. There have been some additional outbuildings constructed on the site over the years, however, the character of the site has remained largely rural and agrarian since the construction of Erwarton Hall in the sixteenth century.

As set out in Historic England's GPA3: Setting of Heritage Assets Guidance the way in which we experience an asset in its setting is also influenced by visual considerations and environmental factors such as noise and vibration as well as, land uses in the vicinity, and by our understanding of the historic relationship between places. Page 13 includes a non-exhaustive list of attributes that may be affected by development within a heritage assets setting, including light spill, introduction of movement/activity as well as, changes to general character and changes to land use.

There are concerns regarding the proposed new access as this would fundamentally alter an open field which has remained historically undeveloped. However, it is acknowledged that this matter conflicts with highway safety requirements.

There are also concerns regarding the introduction of large, glazed areas to the elevations which significantly alter the buildings character and the new openings proposed to all units are likely to result in the loss of historic fabric. The introduction of full height glazing is of particular concern as this can alter the scale and character of the building, given too much prominence to the opening. As noted in Historic England's Adapting Traditional Farm Buildings 'The Historic pattern of openings is related to the function of the building over time, and often makes a fundamental contribution to its mass and character'. There is particular concern regarding the glazed link of unit 4, as this would appear as an overly modern and prominent, resulting in a contrasting architectural feature which would be clearly visible from the streetscene. The large amounts of glazing would also exacerbate the light spill from the development. The scale and appearance of the glazing would detract from the rural, agrarian character of the site and would have an adverse impact on the setting of the aforementioned heritage assets, as well as having a direct impact on the non-designated assets.

New openings should be kept to a minimum and I recommend that the amount of glazing is reduced, and the link omitted. The continuation of a traditional roof covering instead of a glazed link would better uphold the functional character of the site.

The large barn located at the eastern edge of the site (proposed to form part of unit 5) is a traditional timber frame barn, weatherboarded with a brick plinth and a pan tiled roof. Architecturally, it is a unique structure within the site, with other existing outbuildings being of red brick construction. It should therefore remain the only building on site with black weatherboarding as an elevation treatment. The other outbuildings are of red brick construction, dating from the sixteenth century through to the nineteenth century. It would be typologically incorrect to clad these in black painted timber, given there is no evidence of them being weatherboarded. This aspect of the proposal would cover up historic and attractive brick work, detracting from the architectural character of the buildings. The incorrect material detailing, and the inappropriate glazing would detract from the architectural quality and interest of the non-designated heritage assets. It is also considered regrettable that the linear range of unit 2 is not being retained; the height and hipped roof element would detract from its original scale and form.

The proposed alterations would alter the character of the site and detract from our appreciation and

experience of the Grade II listed Erwarton Hall as an isolated country house set in an exclusively rural and agrarian setting which has remained largely unchanged since its construction.*

Due to the fundamental change of use from a working farmyard to residential dwellings, concern regarding the unsympathetic glazing and materiality, the proposal would have an adverse impact on the setting of the above heritage assets. Due to the connection and contribution made by the site to the significance of Erwarton Hall, retaining the character of the farm buildings is key to mitigating the harm as much as possible. In their current form, the proposals would fail to preserve the special interest of the listed building, contrary to Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. With regards to the National Planning Policy Framework the proposal would result in 'less than substantial harm' as per paragraph 202. given the proposal would also have an adverse impact on non-designated heritage assets, paragraph 203 would be relevant. 'Great weight' should be given to the heritage assets conservation as per paragraph 199".

- 9.6 Given that Historic England and Place Services Heritage have both identified some level of less than substantial harm, the cautious view must be taken that some level of harm *would* occur to the heritage assets. The limited public benefits arising from this scheme, are not considered to be sufficient to outweigh the harm identified, this is discussed further below.
- 9.7. The applicant has made various amendments – the exclusion of Units 6 and 7, a more sympathetic extension to Unit 3, detailed information on the boundary treatments and surfacing of the driveway and hard surfacing within the site. The access width was also reduced following comments from the AONB officer. Despite the amendments being made, some level of less than substantial harm is still identified by both Historic England and Place Services Heritage.
- 9.8. Due to less than substantial harm being identified by more than one heritage body, Paragraph 202 of the NPPF (2021) requires the harm to be weighed against the public benefits of the scheme. The public benefits arising from this scheme are limited and include securing the repair and future of the historic barns, employment during the construction stage (albeit this is a temporary benefit), securing a commuted sum towards affordable housing, as well as making use of a previously developed site, rather than developing a greenfield site. There are also limited heritage benefits arising from this scheme, which include the removal of some of the modern buildings on the site, and the repair of Unit 2. These public and heritage benefits are considered limited and insufficient to outweigh the identified less than substantial harm to the character and setting of the Grade II* Erwarton Hall and its Grade I Gatehouse, as well as the character, setting and significance of the undesignated barns subject of this application. In addition to this, the public benefits fail to outweigh the harm caused by the proposal being located in an unsustainable location, as well as harm to the AONB landscape.
- 9.6. During the course of determination, Suffolk County Council Archaeological Services were consulted, and raised no objection to the proposal, subject to conditions. The officer states:

"There will have been changes through time which could have had an impact on earlier remains, in particular 19th Century and more recent changes, but there is potential for traces to remain relating to activity contemporary to the hall and gatehouse and without historical record, archaeological remains would be the main source of evidence for the farm area of this period.

I would advise that a programme of archaeological monitoring of groundworks would be appropriate, or, depending on the final details of proposals, evaluation upfront to investigate the potential prior to construction".

- 9.7. The County Archaeological Unit has advised that there are no grounds to consider refusal of permission in order to achieve preservation *in situ* of any important heritage assets. However, in accordance with NPPF paragraph 194, it is advised that 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.
- 9.8. Should a programme of archaeological work, agreed by the County Archaeological Unit, be undertaken on site prior to commencement of development, then the proposal is not considered to result in harm to any buried heritage assets which may exist.

10.0 Impact On Residential Amenity

- 10.1. Policies within the adopted development plan require, *inter alia*, that development does not materially or detrimentally affect the amenities of the occupiers of neighbouring properties. Concerns for overlooking, loss of privacy and loss of outlook are acknowledged, however, the proposal is not considered to cause any adverse harm to residential amenity in terms of a loss of privacy or a loss of outlook.
- 10.2. The buildings to be converted to dwellings would remain low-set and the design is sympathetic so as to not cause any adverse overlooking potential. The heights of the dwellings also do not create any adverse light blocking potential. One of the tall buildings on the site would be demolished and buildings of a low height, with a single-storey appearance would be erected. The demolition of the metal clad barn is considered to improve the outlook of the site.
- 10.3. During the course of determination, the Environmental Health team was consulted and raise no objection in principle; however, it does have concerns regarding the potential impact to the residential amenity of the future occupants of the barns due to the proximity of the Dutch Barn being retained for equine and agricultural use. As a result, the Environmental Health Officer has recommended a series of conditions to minimise this impact. These include limiting the hours of operation of the Dutch Barn, and times when tractors and other agricultural machinery can use the shared access.
- 10.4. The officer has also identified the use of wood burners within the barns and has recommended a condition to reduce any potential fumes from the flues. With the imposed conditions, the proposal is not considered to cause any adverse harm to residential amenity to warrant refusal.

11.0 Planning Obligations / CIL

- 11.1. The application, if approved, would require the completion of a S106 agreement to secure the commuted sum of £151,872 as a contribution towards affordable housing, as well as a financial contribution towards the Suffolk Recreational Disturbance Avoidance Mitigation Strategy.

12.0 Parish Council Comments

- 12.1. The matters raised by Erwarton Parish Council have been addressed in the above report. To recap, these were as follow:
- Two new dwellings opposed (these were removed from the scheme)
 - Request a Committee site visit take place (this has taken place)
 - Inappropriate design
 - Access is inappropriate (these last two points have informed the reasons for refusal).

PART FOUR – CONCLUSION

13.0 Planning Balance and Conclusion

- 13.1. The site is located within the countryside, outside the built-up area boundaries of any established settlement, creating a heavy reliance on the use of private motor vehicles to access basic services. It is, therefore, contrary to Policies CS2 and CS15 of the Babergh Core Strategy (2014). The limited public and heritage benefits arising from this scheme, are not considered to sufficiently outweigh this harm.
- 13.2. Although the site is considered isolated from settlements, the proposal is not in accordance with Paragraph 80 of the NPPF (2021) because although the proposal could help to secure the future of the undesignated heritage assets, the proposed residential use has not been proven to be the most optimal and viable use through the submission of any evidence or viability statements, therefore, part b) is not considered relevant in this case.
- 13.3. Part c) is relevant because the proposal does re-use redundant and disused buildings, which in part enhances the immediate setting. The demolition of the metal clad barn assists in enhancing the setting of the area; however, retaining the Dutch barn at the rear and the inclusion of the large amount of glazing and driveway is not considered to protect or enhance the setting.
- 13.4. The proposal is also considered to be contrary to Policy CR19 of the Babergh Local Plan (2006) because, although residential use has been put forward as the most optimal and viable use of the buildings; this has not been sufficiently evidenced.
- 13.5. The site is remote from other employment areas; however, it is also remote from any services for residential use. It has not been sufficiently proven that the site only has a viable use for residential. The barns the subject of this application are considered to be of historic merit, being undesignated heritage assets of historic significance. The structural reports submitted with this application show that the 19th Century barns are capable of conversion, without significant rebuilding; the barns would be extended; however, the extensions are not considered to adversely change the overall appearance of them, but the amount of glazing proposed is a concern and could cause harm to the heritage assets. The method of conversion would largely retain the character of the buildings; however, as stated above, the amount of glazing proposed is a concern, and could cause harm to the heritage assets character and setting. The site would remain to be enclosed by the red brick wall, retaining the farmstead aesthetic, however, the additional access could cause an urbanising effect on the farmstead character in a countryside setting.
- 13.2. The proposal is also considered to cause harm to the AONB landscape because the proposed new access track creates an opening in an existing hedgerow, to create a new driveway which creates an urbanising effect, the new access track would also be located across an existing open paddock/field which forms a cohesive landscape feature, and holds important significance in the heritage of the site and the Grade II* listed Erwarton Hall, and should remain undeveloped. On this basis, the proposal is considered to be contrary to Policy CR02 of the Babergh Local Plan (2006), as well as Policy CS15 of the Babergh Core Strategy (2014). The limited public and heritage benefits arising from this scheme, are not considered to sufficiently outweigh this harm.
- 13.3. Both Historic England and Place Services Heritage have identified some level of less than substantial harm to the character, setting and significance of the heritage assets. This is particularly in regard to the impact of the proposed access track/driveway interrupting the open nature of the

paddock/field which holds important significance as a feature of both the landscape and the heritage of the site and Erwarton Hall. The objection also relates to the amount of glazing proposed on the converted barns, which would significantly alter the buildings' character and the new openings proposed are likely to result in the loss of historic fabric. The introduction of full height glazing is of particular concern as this can alter the scale and character of the building, giving too much prominence to the opening. The limited public and heritage benefits arising from this scheme are not considered to outweigh this identified harm as required by Paragraph 202 of the NPPF (2021).

- 13.4. The public benefits arising from this scheme are limited and include securing the repair and future use of the historic barns, employment during the construction stage (albeit this is a temporary benefit) and securing a commuted sum towards affordable housing, as well as making use of a previously developed site, rather than development a greenfield site. There are limited heritage benefits arising from this scheme, which include the removal of some of the modern buildings on the site, and repair of Unit 2. These public and heritage benefits are considered limited and insufficient to outweigh the identified less than substantial harm to the character and setting of the Grade II* Erwarton Hall and its Grade I Gatehouse, as well as the character, setting and significance of the undesignated barns the subject of this application. In addition to this, the public benefits fail to outweigh the harm caused by the proposal being located in an unsustainable location, as well as harm to the AONB landscape.
- 13.5. In order to achieve sustainable development, the Framework identifies that economic, social and environmental gains must be sought jointly and simultaneously.
- 13.6. The proposed development would offer social benefits in respect of securing a commuted sum towards affordable housing provision, as well as securing a future for redundant buildings of historic significance. The proposal should, therefore, be attributed positive weight in terms of the social dimension of sustainable development.
- 13.9. In terms of the environmental pillar of sustainable development, the site is a mostly redundant farmstead and finding a long-term use for the barns is considered to be an environmental benefit. The scheme also proposed air source heat pumps which are a renewable source of energy. The site, however, is isolated from services, and therefore, would lead to a heavy reliance on the use of private motor vehicles.
- 13.10. The impact on character and appearance of the area, biodiversity and flood risk is considered to be neutral. Whilst the proposal would not result in any direct environmental benefit (other than securing a long-term use for the barns), proposed mitigation measures are proposed. The proposal is, therefore, considered to have a neutral impact in terms of the environmental dimension of sustainable development.

RECOMMENDATION

That the application is REFUSED planning permission for the following reasons:

The proposal would cause less than substantial harm to the character, setting and significance of the Grade II* Erwarton Hall, its Grade I Gatehouse and the undesignated heritage asset barns through the fundamental change of use from a working farmyard to residential dwellings.

The proposed unsympathetic glazing and inappropriate materiality as well as the removal of hedgerow and the proposed access track across an existing paddock would create harm to these assets as well as to the AONB landscape.

The proposal site is in an unsustainable location, isolated from services, with poor pedestrian access, causing a heavy reliance on the use of private motor vehicles.

The application fails to secure a contribution towards affordable housing provision, this is contrary to Local Plan policy HS09.

The application has also failed to secure a proportionate financial contribution towards visitor management measures for the Stour and Orwell Estuaries as per the Recreational disturbance Avoidance and Mitigation Strategy (RAMS).

The proposal is, therefore, considered contrary to Policies CR02, CN01, CR19, CN06 and HS09 of the Babergh Local Plan (2006), as well as Policies CS2 and CS15 of the Babergh Core Strategy (2014) and paragraphs 80, 176, 177, 199, 202 and 203 of the NPPF (2021).