

Committee Report

Item No: 9C

Reference: DC/22/03681

Case Officer: Alex Scott

Ward: Stonham.

Ward Member/s: Cllr Nicholas Hardingham.

RECOMMENDATION – GRANT PLANNING PERMISSION WITH CONDITIONS

Description of Development

Full Planning Application - Change of use of land to Caravan Site / Campsite. Erection of welfare building and siting of static caravan as site office.

Location

Field To Rear Of The Crowfield Rose, Debenham Road, Crowfield, Suffolk IP6 9TE

Expiry Date: 21/06/2023

Application Type: FUL - Full Planning Application

Development Type: Major Small Scale - All Other

Applicant: Mr Glen Hughes

Agent: Vision Design & Planning Consultants

Parish: Crowfield

Site Area: 1.217 hectares (ha)

Density of Development:

Gross Density (Total Site): Na.

Net Density (Developed Site, excluding open space and SuDs): Na.

Details of Previous Committee / Resolutions and any member site visit: None

Has a Committee Call In request been received from a Council Member (Appendix 1): No

Has the application been subject to Pre-Application Advice: Yes - DC/21/05291 - 01.11.2021

PART ONE – REASON FOR REFERENCE TO COMMITTEE

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

The application is considered to be of a controversial nature having regard to the planning reasoning expressed by the Parish Council, the extent and planning substance of comments received from third parties, the location, scale and nature of the application.

CLASSIFICATION: Official

PART TWO – POLICIES AND CONSULTATION SUMMARY

Summary of Policies

NPPF - National Planning Policy Framework
NPPG - National Planning Policy Guidance
FC1 - Presumption In Favour Of Sustainable Development
FC1.1 - Mid Suffolk Approach To Delivering Sustainable Development
FC3 - Supply Of Employment Land
CS1 - Settlement Hierarchy
CS2 - Development in the Countryside & Countryside Villages
CS3 - Reduce Contributions to Climate Change
CS4 - Adapting to Climate Change
CS5 - Mid Suffolk's Environment
GP1 - Design and layout of development
HB1 - Protection of historic buildings
HB14 - Ensuring archaeological remains are not destroyed
H16 - Protecting existing residential amenity
H17 - Keeping residential development away from pollution
CL8 - Protecting wildlife habitats
CL11 - Retaining high quality agricultural land
E10 - New Industrial and commercial development in the countryside
E12 - General principles for location, design and layout
T9 - Parking Standards
T10 - Highway Considerations in Development
RT12 - Footpaths and Bridleways
RT16 - Tourism facilities and visitor attractions
RT17 - Serviced Tourist Accommodation
RT18 - Touring Caravan and Camping Sites

Emerging Joint Local Plan Policies - Attributed added weight only, currently:

SP03 - The sustainable location of new development
SP07 - Tourism
SP09 - Enhancement and Management of the Environment
SP10 - Climate Change
LP09 - Supporting a Prosperous Economy
LP12 - Tourism and Leisure
LP13 - Countryside Tourist Accommodation
LP15 - Environmental Protection and Conservation
LP16 - Biodiversity & Geodiversity
LP17 - Landscape
LP19 - The Historic Environment
LP23 - Sustainable Construction and Design
LP24 - Design and Residential Amenity
LP27 - Flood risk and vulnerability
LP28 - Services and Facilities Within the Community
LP29 - Safe, Sustainable and Active Transport
LP32 - Developer Contributions and Planning Obligations

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. These are summarised below.

[Click here to view consultee comments online](#)

A: Summary of Consultations

Town/Parish Council

Crowfield Parish Council - 23rd September 2022

Objects to this application:

- Location is out of character with the area and will significantly affect the landscape;
- Noise and light pollution in rural part of village;
- Detrimental impact on wildlife;
- Proposed access visibility splay appears outside the ownership of the applicant;
- The footpath has been wrongly marked on the plans;
- Village has no pavements;
- Proposed access is within 60mph speed zone;
- Concerns with regards foul water drainage;
- Frequent vehicle movements and noise would impact amenity;
- Stonham Barns is only a short distance away and provides plenty of tourist accommodation already;
- Recommend: Phasing; Landscaping; No residential use; and tying pub to field use conditions, if there is a possibility that this application is approved.

National Consultee

None.

County Council Responses

SCC - Highways - Latest Response - 20th October 2022

Following submission of additional information - Raise no objection - Subject to compliance with suggested conditions.

SCC - Highways - Subsequent Response - 28th September 2022

Maintain Holding Objection - Concerns regarding visibility splays shown, that appear to cross over third-party land in both directions - Vehicular visibility splays must be within the public highway or the applicant's land or in control of - No secure, covered and lit cycle storage and electric vehicle charging infrastructure have been evidenced/proposed.

SCC - Highways - Initial Response - 23rd August 2022

Holding Objection - Clarification required regarding area of parking available to employees and visitors - Secure, lit and covered Cycle Storage required - EV charging for 15% of parking spaces required -

Surfacing details of proposed spine road also required (Applicant's agent has indicated further information will be submitted to address).

SCC - Lead Local Flood Authority (LLFA) - Latest Response - 6th March 2023

Recommend Approval - On basis of further information received - Subject to suggested condition.

SCC - Lead Local Flood Authority (LLFA) - Subsequent Response - 12th January 2023

Maintain Holding Objection - Actions required in order to overcome current objection: 1. Demonstrate that the applicant has the right or has acquired the rights to discharge surface water into the watercourse; 2. Demonstrate that the combined discharge for both the surface water drainage and the private treatment works (foul) will not exceed Qbar for all events up to and including a 1:100+CC rainfall event; and 3. Submit a flood flow exceedance plan.

SCC - Lead Local Flood Authority (LLFA) - Subsequent Response - 24th October 2022

Maintain Holding Objection - Action required in order to overcome current objection: Submission of a surface water drainage strategy - The LLFA would like to see a surface water drainage strategy utilising above ground SuDS for collection, conveyance, storage, and discharge, providing multi-functional and benefits.

SCC - Lead Local Flood Authority (LLFA) - Initial Response - 6th September 2022

Holding Objection - The proposed development is over 1 hectare in area. Therefore, the applicant needs to assess all types of flood risk (Fluvial, pluvial, groundwater, reservoir, and foul) for the site and provide a strategy for the disposal of surface water shall be submitted in line with national/local policy and guidance - Actions required in order to overcome objection: Site specific FRA; Surface Water Drainage Strategy (Applicant's agent has indicated further information will be submitted to address).

SCC - Archaeology - 18th August 2022

No Objection - No significant impact on known archaeological sites or areas with archaeological potential - Do not believe any archaeological mitigation is required.

SCC - Public Rights of Way - 14th September 2022

Accept Proposal - Subject to applicant's rights and responsibilities.

SCC - Fire and Rescue - 19th August 2022

No additional fire hydrants required - Automatic fire sprinkler system recommended.

Internal Consultee Responses

MSDC - Ecology Consultants - Place Services - 26th October 2022

No objection subject to securing biodiversity mitigation and enhancement measures.

MSDC - Landscape Consultants - Place Services - 17th October 2022

Landscape and visual appraisal; Arboricultural Survey; Detailed Hard and Soft Landscaping Plans; Landscape Management Plan; External Lighting Strategy; Details of Landscape Based surface water management - Required.

MSDC - Environmental Protection - Land Contamination - 9th & 30th September 2022

No objection - Subject to Standard Condition CL01 and advisory note.

MSDC - Environmental Protection - Noise, Odour, Light, Smoke (Other) - 12th September 2022

No objection subject to: Site Management Plan; Noise Assessment; and Lighting Conditions.

MSDC - Food and Safety - 19th August 2022

No objections in principle - Site licence required - Chemical toilet disposal point required - Each tent must be 6 metres from a neighbouring unit.

MSDC - Waste Manager - 6th September 2022

No objection - Subject to condition ensuring road surface is suitable for a RCV to drive on.

MSDC - Economic Development - Latest Comments - 28th October 2022

Further to the additional clarification from the agent: reiterate that economic development are supportive of tourism accommodation as an ancillary diversification of business to support the sustainability of hospitality businesses such as a public house - This can add value to the overall offer of the main business and add an element of additional use and visitor attraction that helps to support the long term future of the public house ensuring that this valuable community asset remains.

Whilst it is noted that the majority of the site is for touring pitches encouraging short stay visitors to the area there is also the inclusion of 5 caravan pitches - Unsure as to whether these are for more permanent lettable caravans or visiting touring pitches, should it be the former: suggest that these are also conditioned to ensure that they are occupied as tourism use only.

Recommend that the tourism use is intrinsically linked to the public house by condition, as the justification for the accommodation is the sustainability of the public house, any attempt to disaggregate the two may cause potential conflicting amenity for users.

MSDC - Economic Development - Initial Comments - 5th October 2022

Welcome a tourism offer, as a complementary diversification for a hospitality business, in principle, however, this application fails to clarify the relationship between the existing pub or demonstrate the justification for such a large site. It would be helpful to understand more detail on the justification and longer term plan behind this application before economic development offer further comment.

B: Representations

At the time of writing this report at least 73 letters/emails/online comments have been received. It is the officer opinion that this represents 71 objections, 2 support and 0 general comment. A verbal update shall be provided as necessary.

Views are summarised below:-

71 objections - Summarised:

- o Pub is currently closed - Question/sceptical: why they would want to open a campsite - Consider pub is intentionally being run down - Understand Stonham Barns have purchased the pub.
- o Existing field is a wildlife haven: Owls; Deer; Birds; Bats; Reptile; Amphibians; Harvest Mice
- o Fronting highway is national speed limit and dangerous - Increased access use would be more dangerous.
- o Increased vehicle use in the village would impact highway safety and convenience and would result in more pedestrians in the road.
- o Proposal will not benefit the village in any way.
- o There is no shop or facilities in Crowfield, therefore, future users would need to travel by Car to a Shop (nearest along way away in Debenham), causing more traffic/danger.
- o Proposal would affect setting and use of public footpath and poses a security risk.
- o Proposal will ruin the landscape.
- o Field is prone to flooding - Local knowledge given as evidence.
- o Proposal is not needed - Three other sites in the village and Stonham Barns also in the locality.
- o Consider field could be used for holding events, which would result in cars being parked on the road, which is hazardous as the road is national speed limit - local knowledge indicates this has happened in the past.
- o Proposal would affect neighbouring properties outlook.
- o Proposal would result in increased noise, disturbance, smells and smoke (from fires and barbecues) in the locality.
- o Proposal would impact the peace and tranquillity of the area.
- o Proposal would result in increased litter.
- o Proposal site is good quality agricultural land and should be used for growing crops or grazing animals.
- o Proposal is outside the village settlement boundary and so should be refused.
- o Concerns with regards disposal of dirty water and contamination of drainage ditches and water table.

2 in support - Summarised:

- o Good use of field.
- o Proposal will support pub, which is a valuable community resource.

(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: 1090/00/	CHANGE OF USE OF PUBLIC HOUSE TO NURSERY SCHOOL.	DECISION: Application Withdrawn - 26.02.2001
REF: 0871/96/	ERECTION OF REAR AND SIDE SINGLE STOREY EXTENSIONS TO PUBLIC HOUSE WITH PROVISION OF CAR	DECISION: PLANNING Permission Granted - 04.11.1996

CLASSIFICATION: Official

PART THREE – ASSESSMENT OF APPLICATION

1. The Site and Surroundings

- 1.1. The site extends to approximately 1.217 hectares and is located to the north-west side of Debenham Road, to the rear of the Crowfield Rose Public House, approximately 0.5 kilometres to the north-east of the village of Crowfield and approximately 0.8 metres to the south-west of the village of Pettaugh.
- 1.2. The site is described as being a parcel of maintained grassland, within the ownership of the public house, with existing hedgerow and tree vegetation bounding the perimeter.
- 1.3. The site lies outside of any settlement and settlement boundary as described in the current development plan and, therefore, in planning terms, lies within open countryside.
- 1.4. The site comprises Grade 3b (Moderate Quality) Land, when assessing suitability for agriculture.
- 1.5. A Public Right of Way runs along the boundary of the site, and then through part of the site, connecting Debenham road in the south to Lewis Farm in the north. Suffolk Country Council retain the record of the lawful route of this Public Right of Way.
- 1.6. The setting of a Grade II Listed Building at New Hall extends towards the site, the host building of which lies approximately 250 metres to the south of the site, on the opposite side of Debenham Road.
- 1.7. It is proposed to use the existing access off Debenham Road, through the existing Pub Car Park, to access the development. An internal access track, down the centre of the site is also proposed. The speed limit of Debenham Road in this location is the National Speed Limit of 60 mph.

2. The Proposal

- 2.1. The application seeks full planning permission for the change of use of land to the rear of the existing Crowfield Rose Public House and Car Park to a Camping and Caravan site.
- 2.2. Approximately one third of the site, to the south-east boundary, immediately to the rear of the Public House, would be occupied by 6 no. static caravans and 1 no. services building (containing: WC; Shower; Washing Up and Storage facilities). 5 no. of the static units would be provided for tourist/holiday use and 1 no. unit would provided for site office/management use.
- 2.3. The north and north-west third of the site is proposed to be retained as a grass field, for the tent pitches.

- 2.4. The final third of the site, to the south-west is also proposed to be retained as a grass field, for an amenity and activity area for guests.
- 2.5. An internal access road, down the centre of the site, is also proposed, leading through the existing pub car park and ultimately using the existing public house access to the highway, to the south of the site.

3. The Principle of Development

- 3.1. The NPPF, at paragraphs 84 and 93, provides that LPA's should plan positively for the retention, provision and development of local services and community facilities (such as public houses), guard against their unnecessary loss, and ensure an integrated approach when considering the location of new developments.
- 3.2. Retention of Shops, Post Offices and Public Houses - Supplementary Planning Document (2004) also seeks to guard against the loss of such community services and facilities. Note: this SPD is not formally saved planning policy but is treated as planning guidance.
- 3.3. The principle of the proposed serviced tourist accommodation and campsite is supported by current adopted development plan policies RT16, RT17, RT18, as well as emerging Joint Local Plan Policies SP07 and LP12. The proposal is considered to have significant tourism benefits and wider economic benefits for the area. In particular it is noted that the site lies a short distance, to the south of the recognised A1120, with a significant amount of tourist attractions that could benefit as a result of the development locally.
- 3.4. The proposed development would also not result in the loss of the existing public house, would not result in a loss of existing floorspace currently available to the public house, and would not result in the significant loss of existing external beer garden or parking space. The proposed development would not likely, therefore, conflict with the aforementioned planning policy with respect to retention of community services and facilities.
- 3.5. Should approval be considered, your economic development officers have advised that the proposed holiday accommodation should remain for holiday/tourism use/benefit, and support the principle public house land use, should it not compromise the existing public house business, either directly and/or indirectly.
- 3.6. Should this be the case, the principle of such a proposal, in support of tourism and the Public House (local service and/or facility), are supported by your officers, subject to acceptability with regards other material planning considerations. Those considered most relevant to the proposal are set out below:

4. Design, Layout, Landscape Quality

- 4.1. The proposed new service buildings and structures proposed are considered appropriate to the rural character of the site and the character and setting of existing buildings, and to respect the landscape setting, in terms of their number and density, siting, scale and detailed design.
- 4.2. The proposed static units are not considered overly numerous and would be temporary structures. Should landscape screening be agreed, to reduce the visual impact of the structures in the landscape then the harm in this respect is considered to be minimal and reversible, due to the temporary nature of the units.

5. Impact on Heritage Assets

- 5.1. The application site extends to within the setting of a Grade II Listed Building at New Hall, the curtilage of which lies to the south of Debenham Road, with the Listed Building itself being located approximately 250 metres from the application site itself, with the pub, pub car park, the highway and New Hall's curtilage parkland all intervening.
- 5.2. Due to the separation distance of the site and the heritage asset, the intervening land and developments, as described above, and the possibility to secure increased landscape screening to the site's southern boundary, the current proposal is not considered to result in demonstrable harm to the setting and significance of this or any other heritage asset within the landscape.
- 5.3. As such the proposal is considered to be in accordance with the provisions of development plan policy HB1 and section 16 of the NPPF, as a material consideration.

6. Site Access, Parking and Highway Safety Considerations

- 6.1. In terms of assessment against current planning policy the development should not result in an unacceptable impact on highway safety and should provide safe and suitable access to the site for all existing and proposed land users. The development should also ensure that any significant effects on the transport network can be cost effectively mitigated to an acceptable degree. The development also ensures that opportunities have been taken to promote sustainable transport modes. Electric vehicle charging and secure cycle storage is proposed (to be ensured by way of condition) and the site lies along the route of the 116 Bus service, between Coddensham and Pettaugh (and ultimately Debenham and Ipswich) which, although limited, does provide a sustainable transport option.
- 6.2. On-site turning and parking should also be provided in accordance with current advisory parking standards provided by the Local Highway Authority. Sufficient on-site turning and parking should be proposed for the development, whilst retaining suitable provision for the existing Public House.
- 6.3. The proposal would provide opportunities for access via the existing public house access to the highway and, following amendments made by the applicant, as advised by the Local Highway Authority at Suffolk County Council, the proposed means of access and visibility splays are considered adequate, subject to compliance with suggested conditions.
- 6.4. The proposed on-site turning and parking provision is also considered acceptable, in accordance with current SCC advisory parking standards.

- 6.5. The proposed development is, therefore, considered acceptable in highway safety terms and in accordance with the provisions of development plan policies T9 and T10 and with NPPF paragraphs 110 and 111.

7. Public Right of Way

- 7.1. A public right of way (Crowfield Public Footpath 3) runs through and adjacent to the site, from Debenham Road, to the south-west of the site access, then across the site, between the pub car park and proposed service building, and then adjacent to the eastern boundary of the site.
- 7.2. The Public Rights of Way Officer at SCC has commented on the application and has accepted the proposal, subject to the right of way remaining open, unobstructed, and safe for the public to use at all times, and the applicant being made aware of their rights and responsibilities with regards the public right of way.
- 7.3. The proposed development is not considered to adversely affect the existing setting of this public right of way.

8. Biodiversity and Protected Species

- 8.1. By reason of the undeveloped nature and extent of the site, which is surrounded by established trees and hedgerows and a system of open land drains, and adjacent to open countryside on three sides, the site is considered to provide significant habitat and foraging potential for protected and priority species.
- 8.2. Regulation 9(3) of the Conservation of Habitats and Species Regulations 2017 (Implemented 30th November 2017) provides that all competent authorities (public bodies) to have regard to the Habitats Directive in the exercise of its functions.
- 8.3. Your Ecology consultants at Place Services have assessed the current proposal, and the Ecology Assessment provided, and have raised no objection subject to securing biodiversity mitigation and enhancement measures, by way of condition.
- 8.4. Should approval be granted it is recommended that the development is carried out in accordance with the Ecological Appraisal Recommendations, and a Biodiversity Enhancement Strategy is submitted and approved.

9. Land Contamination

- 9.1. Paragraph 183 of the NPPF provides that planning decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land contamination. Paragraph 185 states that decisions should also ensure that new development is appropriate for its location taking into account the likely effects of pollution on health, living conditions and the natural environment.
- 9.2. Whilst there is nothing to indicate that the site may be potentially contaminated, on the basis of the information provided, having considered the sensitive nature of the development proposal

(that of tourist accommodation) further land contamination investigation and remediation, where necessary, is considered to be required by way of condition, as advised by your Environmental Protection Officers, prior to commencement.

10. Flood Risk and Surface Water Drainage

- 10.1. The site lies completely within Environment Agency Flood Zone 1, where there is a very low probability (less than 1 in 1000 annually) of flooding from river or tidal sources. The nearest EA Flood Zones 2 or 3 lie approximately 830 metres to the north-east of the site. The site is also not shown (from council flood risk data) to be at significant risk of flooding from other sources. As such the proposal site is not considered to be at significant flood risk.
- 10.2. It is expected that surface water would be directed to Sustainable Drainage Systems (SUDs) on site in the interest of not increasing flood risk elsewhere.
- 10.3. The Lead Local Flood Authority (LLFA) at Suffolk County Council has been consulted on the current proposal and, following receipt of additional and amended information, are satisfied that the applicant has sufficiently addressed their requirements and proposed a sustainable drainage solution with regards to the collection, conveyance, storage, and discharge of surface water that incorporate the four SUDs pillars (Quality, quantity, biodiversity, and amenity).
- 10.3. Should surface water be managed and disposed of, as per the strategy provide, the proposed development would not, therefore, be at significant risk of flooding and would not demonstrably result in increased flood risk on the site or elsewhere, consistent with the requirements of NPPF Paragraph 169.

11. Impact on Residential Amenity

- 11.1. The proposed development will be expected to create a high standard of amenity for existing and future land users, in accordance with the provisions of NPPF paragraph 130.
- 11.2. The nearest residential properties appear to be a significant distance from the proposal site (in excess of 150 metres away) and as such, such a development proposal would not likely result in significant harm to existing residential amenity should details such as: floodlighting; amplified music; and other activities which may cause disturbance be limited by way of suitable worded planning conditions.
- 11.3. Your environmental protection officers have assessed the application proposal and have raised no objection, subject to conditions requiring: a site management plan; noise assessment; and lighting scheme.
- 11.4. The proposed land use(s) are not, therefore, considered to result in significant harm to the amenities currently enjoyed by occupants of nearby residential properties, subject to compliance with suggested conditions.

12. Parish Council Comments

12.1. The matters raised by Crowfield Parish Council have been addressed in the above report.

PART FOUR – CONCLUSION

13. Planning Balance and Conclusion

- 13.1. The principle of tourist related facilities on the site is supported by policies RT16, RT17 and RT18 of the current adopted development plan, with emerging Joint Local Plan Policies SP07 and LP12 also adding positive weight. It is also considered the proposal would help support the existing Public House Business.
- 13.2. Subject to agreement of a detailed scheme of landscape planting and screening, the proposal would conserve the character of the site, its landscape setting, and the settings of heritage assets, and would result in biodiversity enhancements.
- 13.3. The proposed development is considered acceptable in terms of highway safety and convenience, would promote accessibility via a range of transport modes, and would ensure the route of the public right of way is not significantly affected, and its setting and route preserved.
- 13.5. Subject to compliance with suggested conditions, the proposal would not result in significant harm to the amenities currently enjoyed by occupants of nearby residential properties, to the extent that refusal of planning permission should be considered on such grounds.
- 13.6. The proposal is, therefore, considered to represent sustainable development, having had regard to the provisions of the development plan and NPPF, when taken as a whole.

RECOMMENDATION

That the Chief Planning Officer be authorised to GRANT Planning Permission subject to conditions as summarised below and/or those as may be deemed necessary by the Chief Planning Officer:

- Standard time limit (3yrs for implementation of scheme);
- Approved Plans and Documents (Plans and Documents submitted that form this application);
- Land Contamination Investigation and any remediation required;
- Site Management Plan;
- Noise Assessment for any fixed plant or machinery;
- No amplified music to be played outside at any time;
- Road Surface details - Road Surface must be suitable for a Refuse Collection Vehicle (RCV) to drive on;
- Development to be carried out in accordance with Ecological Appraisal Recommendations;
- Biodiversity Enhancement Strategy;
- Restriction of use of the 5 no. Static Caravans, for Holiday and Tourism purposes only;
- Removal of 5 no. Static Caravans, if not required for Holiday and Tourism purposes, and the land to revert to that associated with the Public House;

- Approved use to be linked to the Public House, in the interest of sustaining and enhancing;
- Disposal of surface water to be implemented as per submitted strategy;
- Highways - Access to be improved to current SCC Standards;
- Highways - Access Visibility Splays to be provided as proposed and retained;
- Highways - Access Surface Water Drainage Details required
- Highways - Access surface to be bound for at least 10 metres back from the highway;
- Highways - Gates or other means of obstruction to be set back at least 10 metres from the highway;
- Highways - Turning and Parking to be provided as proposed;
- Highways - Secure Cycle Parking and Electric Vehicle Charging and Parking details required prior to commencement.
- Highways - Bin collection details required;
- Landscape and Visual Appraisal required;
- Arboricultural Survey required;
- Detailed Hard and Soft Landscaping Strategy required;
- Landscape Management Plan required;
- External Lighting Strategy required;
- Landscape based surface water management plan required.