

Committee Report

Item No: 8B

Reference: DC/22/04751

Case Officer: Emily Vuyk

Ward: Brett Vale.

Ward Member/s: Cllr John Ward.

RECOMMENDATION – REFUSE PERMISSION

Description of Development

Full Planning Application - Change of use of land for the siting of 38 No. additional Holiday Lodges and construction of raised decking for each unit

Location

Brett Vale Golf Club, Noaks Road, Raydon, Ipswich, Suffolk, IP7 5LR.

Expiry Date: 31/07/2023

Application Type: FUL - Full Planning Application

Development Type: Change of Use

Applicant: Brett Vale Golf Course

Agent: Mr Jonathan Moore Lambe

Parish: Raydon

Site Area: 7.35 hectares

Density of Development:

Gross Density (Useable Area): 10 lodges (caravans) per hectare for the 38 – lodge layout scheme (NOTE – the application was originally submitted as 57 lodges)

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

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

Has the application been subject to Pre-Application Advice: Yes (Ref: DC/21/04503, advice was given that the application was unlikely to be supported).

PART ONE – REASON FOR REFERENCE TO COMMITTEE

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

The Chief Planning Officer considers the application to be of a controversial nature having regard to the planning reasoning expressed by the Parish Council and the extent and planning substance

CLASSIFICATION: Official

of comments received from third parties, as well as the location, scale, and nature of the application.

PART TWO – POLICIES AND CONSULTATION SUMMARY

Summary of Policies

Joint Local Plan - Part 1 policies - November 2023

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
LP18 - Area of Outstanding Natural Beauty
LP19 - The Historic Environment
LP23 - Sustainable Construction and Design
LP24 - Design and Residential Amenity
LP26 - Water resources and infrastructure
LP27 - Flood risk and vulnerability
LP29 - Safe, Sustainable and Active Transport
LP32 - Developer Contributions and Planning Obligations

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. These are summarised below.

A: Summary of Consultations

Town/Parish Council Responses

Raydon Parish Council

Objects to this application on the grounds that, the new development in the countryside is contrary to the JLP and NPPF and that the 57-lodges would be of impact to landscape, the AONB, environment, wildlife, drainage, increase traffic, highways safety and that there is a lack of infrastructure available. As well as having concern the lodges will be lived in year-round.

Re-commented that the council reiterates its comments earlier this year, as follows Raydon Parish Council met on November 8th and discussed the application for an additional 38 holiday lodges with raised decking, which Councillors felt was far too many

Holton St Mary Parish Council

Objects to this application on the grounds that the scale of the development is inappropriate for the character of the local area, and the lodges will give rise to light and nocturnal noise pollution harmful to wildlife and the AONB landscape, increased traffic, and highways safety concerns.

Re-commented that previous response in objection remains. With further comment in relation to the new Joint Local plan policies: Stating that LP13 specifically restricts planning on such a site to "small scale infill", because the site is open countryside this policy would be violated. LP18 makes it quite clear that such a major development would be refused due to its proximity to an AONB. LP 17 makes it clear that developments should be sensitive to the landscape and conserve and enhance it. These conditions are unmet.

Shelley Parish Council

Objects to this application on grounds that the new development is located in the countryside and is contrary to planning policy. The lodges will rise to light and noise pollution harmful to the AONB landscape and wildlife, there is unsuitable access, and increased traffic will impact quiet lanes.

National Consultee Responses

Natural England

No objection subject to securing appropriate mitigation for recreational pressure impacts on habitat sites (European Sites).

County Council Responses

Public Rights of Way Team

Informative comments in regard to Raydon Public Footpath 32.

Suffolk Fire and Rescue Service

Informative notes water supplies, access, and firefighting facilities.

Flood and Water Team

Holding objection maintained because the proposed site is still at predicted risk of surface water flooding that is contrary to NPPF, and the revised site layout is not in line with the FRA site layout.

Re-commented that a holding objection is necessary because whilst the applicant has alluded to a strategy for the disposal of surface water, the detail provided is illustrative and does not meet the requirement of the LLFA for a full planning application.

Dedham Vale & Stour Valley Project

The AONB teams maintains its opposition to this scheme on the grounds of design (scale and layout) and erosion of tranquillity levels linked to increase in level of traffic and associated noise. Conditions are recommended to restrict external lighting and to prevent in perpetuity a change of use of the site to residential.

Re-commented that despite the reduction in the number of chalets by 19, the AONB team still has substantial concerns about this development within the immediate setting to the Dedham Vale AONB. A tourism development of 38 chalets is still considered to constitute major development so close to the AONB. No changes have been proposed to the layout of the chalets which would be sited around a new access track. The estate like character of the development is not considered appropriate in the countryside. While it is accepted that the landscape character of the site has been modified by the development of the golf course over the years, the type of development now being proposed would further modify the landscape character and introduce incongruous development where little currently exists. The design of the chalets with their large, glazed frontages, and lighting bollards will increase light spill. Along with increased traffic levels these issues remain a concerns. Even with the reduction in scale, tranquillity levels are likely to be reduced as a result of cumulative increased light spill in an unlit 'dark' landscape and from increased traffic on the rural road network in the vicinity of the site. Contrary to NPPF para 176.

Highways and Infrastructure Team

Holding objection removed due to the submission of a proposed highway improvement scheme for additional passing places. Conditions recommended to secure highway improvements, off-site directional signage, upgrade of Sulleys Hill crossing, electric vehicle/transport infrastructure, refuse and recycling storage and collection points, a construction management plan, and a construction Deliveries Management Plan for HGVs.

Internal Consultee Responses

Food and Safety Officer

Informative comments regarding licensing responsibilities.

Economic Development & Tourism

Concerns raised for the scale and density of the reduced number of proposed lodges (38) and the consequential impacts, conditions to restrict use to short-term stay recommended.

ECC Place Services for Ecology Consultant on behalf of BMSDC)

No objections subject to recommended conditions for ecological mitigation and enhancement measures, and to secure a proportionate financial contribution towards visitor management measures for the Stour and Orwell Estuaries SPA & Ramsar.

ECC Place Services for Landscape (Consultant on behalf of BMSDC)
Recommend condition to agree a Landscape Management Plan.

Arboricultural Officer

No objection subject to securing appropriate planting mitigation for the loss of a small number of trees that are of limited visual value, and conditions that the work is in accordance with the AIA report.

Environmental Health (Land Contamination)

No objection if ground conditions are found to be in line with the submitted Phase 1 report, in the event that they are not, the applicant is to make contact.

Environmental Health (Smoke/Noise/Odour/Light Pollution)

No objection subject to condition to agree details of foul drainage and the details for the installation of the proposed external lighting.

Waste Services Officer

No objection subject to condition to ensure a 32-tonne refuse collection vehicle can manoeuvre around the site and access any communal bins, and that the shared bins are of a suitable size.

Strategic Housing Officer

No objection subject to condition for an occupancy restriction. This should be drafted so as to require a new planning application to allow for conversion to residential development, and such a permission (if sought and granted) would then include provision for a proportionate commuted sum towards affordable housing.

External Consultee Responses

Anglian Water

No comment, as there is no connection to the main sewers.

Suffolk Wildlife Trust

Raised concerns for timings of ecological surveys undertaken, insufficient information in respect of an external lighting scheme, lack of reference to a nationally scarce plant which is rare in Suffolk

Dedham Vale & Stour Valley Society

The Society returned a letter of objection to this application. Raising concerns for light pollution, noise pollution, landscape harm, scale of development, and inadequate buffer to the AONB.

B: Representations

At the time of writing this report at least 40 letters/emails/online public comments have been received. It is the officer's opinion that these represent 35 objections, 4 comments in support and 1 neutral comment.

A verbal update shall be provided as necessary.

The general views of the public comments made are summarised by the below commonly raised topics: -

| Obj. | Planning Matters Raised |
|------|---|
| (22) | Increased Traffic/Highways Issues |
| (21) | Affects Local Ecology/Wildlife |
| (20) | Landscape Impact |
| (20) | Out of Character with the Area |
| (19) | Light Pollution |
| (18) | Noise |
| (14) | Over development of site |
| (13) | Inadequate Access |
| (13) | Dominating/Overbearing |
| (12) | Loss of Open Space |
| (11) | Strain on existing community facilities |
| (11) | Inappropriate in a Conservation Area |
| (8) | Scale |
| (8) | Development too high |
| (7) | Inadequate public transport provisions |
| (6) | Increase in Pollution |
| (6) | Health & Safety |
| (5) | Inadequate parking provision |
| (4) | Sustainability |
| (4) | Application is lacking information |
| (4) | Design |
| (3) | Building Work |
| (3) | Increase in Anti-Social Behaviour |
| (3) | Trees |
| (2) | Fear of Crime |
| (2) | Conflict with Neighbourhood Plan |
| (1) | Conflict with District plan |
| (1) | Residential Amenity |
| (1) | Drainage |
| (1) | Loss of Privacy |

Other frequently raised topics both in support and objection were in respect of, impact to the golf course business's viability, justification of need to diversify the business offerings and demand for the rural tourist accommodation, potential for change of use from short-stay lodges (caravans) to long-term residential units and subletting, impact to neighbouring equestrian centre, impact to a neighbouring Suffolk Wildlife Trust-designated Private Nature Reserve and Wildlife Corridor, impact to the local designated quiet lanes, impact to the enjoyment of the public footpath, impact to the existing Sulleys Hill golf course crossing point, impact to countryside hedgerows, construction HGV traffic access and movement, impact to local sewer system, water pressure, and power supply, and land forming.

(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/20/05024 | Application withdrawn - to be submitted as a new application to Suffolk County Council planning team for determination as the proposed works fall under their jurisdiction. Planning Application. Re-modelling and re-landscaping works to the eastern half. Addition of new dedicated warm up area, golf practice academy featuring x3 practice greens and bunkers, 'Golf Pod' (enclosed netted space) and water storage pond. | DECISION: WDN 07.01.2021 |
| REF: DC/18/02779 | Discharge of Conditions for application DC/17/05433 - Condition 4 (Materials) | DECISION: GTD 06.07.2018 |
| REF: DC/18/01172 | Discharge of Conditions Application for DC/17/05433 - Condition 5 (Landscaping Scheme) and Condition 7 (Landscape Management Plan). | DECISION: GTD 16.05.2018 |
| REF: DC/17/05433 | Erection of 9 no. holiday lodges. | DECISION: GRA 12.12.2017 |
| REF: B/16/01047 | Application for Certificate of Lawfulness for a Proposed Development - Detached dwelling for use as Steward's Accommodation. | DECISION: GRA 10.10.2016 |
| REF: B/11/00560 | Erection of a conservatory on the external terrace at first floor level. As amended by drawing A received on 30th June 2011. | DECISION: GRA 30.06.2011 |
| REF: B/05/02043 | Retention of pond and bund adjacent 18th Green. | DECISION: GRA 12.01.2006 |
| REF: B/05/00951 | Retention of caravan for residential use for a temporary period of 3 years. | DECISION: GRA 11.08.2005 |
| REF: B/03/00470 | Erection of a two-storey detached dwelling for use as Stewards accommodation. | DECISION: GRA 29.04.2003 |

| | | |
|-------------------------|--|------------------------------------|
| REF: B//02/01262 | Erection of two storey detached dwelling for use as Stewards accommodation | DECISION: REF 18.09.2002 |
| REF: B/02/00016 | Erection of two storey detached dwelling | DECISION: REF 05.03.2002 |
| REF: B//99/00902 | Erection of new lobby and terrace extensions to provide changing accommodation within existing clubhouse and cladding of clubhouse with black boarding. Erection of 5 covered practice bays adjacent to clubhouse | DECISION: GRA 13.08.1999 |
| REF: B//95/01446 | Alterations to existing golf course layout and extension of course into part of garden of Sulley's Manor Farm as amended by revised drawing received 20.03.96. | DECISION: GRA 22.03.1996 |
| REF: B//95/00540 | Retention of golf course to an amended layout to that approved under p.p. B/90/0798. | DECISION: GRA |
| REF: B//93/00829 | Retention of 2 temporary portable offices (3 years). | DECISION: GRA |
| REF: B//93/00220 | Insertion of new windows and replacing of existing doors to front elevation, and insertion of new windows and emergency exit door to rear elevation (to facilitate use of building as temporary golf club house). | DECISION: GRA 26.04.1993 |
| REF: B//91/00797 | Erection of clubhouse and professionals' workshop and construction of associated car parking as amended by revised drawings nos. 112/90/5a, 6a, 7a, 8d, 9a, 10a and 11 received on 07.08.91 and further amplified by applicant's letter dated 07.08.91 | DECISION: GRA 16.09.1991 |
| REF: B//90/00798 | Construction of 18-hole golf course, erection of clubhouse and associated car park. installation of private sewage treatment plant as amended by the applicants revised drawing received on 19.11.90 and further amplified by the | DECISION: GRA |

applicant's letters dated 28.09.90 and 15.11.90

REF: B/EN/87/90357 Provision of a golf course.

DECISION: GRA
28.10.1987

REF: B/EN/86/90026 Proposed golf course.

DECISION: GRA
04.03.1986

PART THREE – ASSESSMENT OF APPLICATION

1.0 The Site and Surroundings

- 1.1. The red lined site area includes the existing driveway access from Noaks Road, the existing car parking area, and the clubhouse, which amounts to a total site area of 7.35ha. However, the useable land proposed to host the development is only 3.97ha of this. This land is a portion of the Brett Vale Golf Club's 18-hole course that contains golf holes numbered 14 to 16 arranged around a wooded central rough. The remaining golf holes, steward's lodge, and existing nine holiday lodges in the wider land ownership of approximately 46ha are not included in the red line.
- 1.2. Some of the land is partly separated from the wider golf course by the public highway Sulleys Hill, which is an unclassified road that is designated as a quiet lane and has a national speed limit. This public highway is routed following the land boundaries at the northwest around to the east.
- 1.3. Sulleys Hill is a single vehicular width road and has an existing crossing point used by golfers. Hedgerow and perimeter tree planting mostly screen visibility into the site until this crossing point. From here, pedestrians and golfcarts gain access to the rest of the site area to the northeast, where golf hole number 13 and the tee-off for golf hole number 17 are arranged with bunkers. From there onwards, access through to the wider golf course and facilities is unobstructed. This other area of land hosting the development would link the isolated land parcel with the golf course and nine lodges, there is no sense of enclosure or separation of this linking land from the wider golf course land. It is noted that the letting of the existing holiday lodges may not be directly managed by the golf club. However, there is a restriction upon their occupation for holiday purposes only by condition 9, and vehicular access to the lodges can only be gained via the golf club's Noaks Road entrance.

"9. ONGOING REQUIREMENT OF DEVELOPMENT: TIME RESTRICTION ON HOLIDAY LET

The holiday lets hereby approved shall be occupied for holiday purposes only; and shall not be occupied as a person's sole, or main place of residence. The owners/operators shall maintain an up-to-date register of the names of all owners/occupiers of individual holiday

lets on the site, and of their main home addresses, and shall make this information available at all reasonable times to the local planning authority.”

- 1.4. The area of the site which forms an isolated portion of the golf course containing holes 14-16, has a central rough that is heavily tree planted and there is a slope descending towards the northwest. There are no water hazards within the site but there are several bunkers found around the holes.
- 1.5 A public footpath is routed following the site boundaries southeast around towards the west. There is a neighbouring residential property Snow Downs situated at the far northwest corner adjacent to the boundary and several paddocks of subdivided land bordering the golf club.
- 1.6 The site’s southeastern boundaries abut the Dedham Vale National Landscape, where there is another residential property Pippens situated at the far southeastern corner, and the land is subdivided into several paddocks bordering the golf club with the public footpath between.
- 1.7 Fence, hedgerow and perimeter tree planting enclose the golf course at this transition, but generally there is a visual contrast as the golf course land appears manicured and managed, whereas the surrounding countryside to the south of the site is mainly farmed open agricultural land, against the backdrop of Timber Hill Wood in the National Landscape approximately 250 metres from the site.
- 1.8 In relation to the nearest settlement, Raydon, the Brett Vale Golf Club does not adjoin the built-up area boundary as drawn by the Babergh Local Plan 2006 and is deemed to be in the countryside. Raydon is within the functional village clusters that are served by core villages Capel St Mary and East Bergholt. Between the wider golf club and settlement boundary is the Water Farm Dressage Centre.
- 1.9 The distance from the Noaks Road vehicular access to the golf club from the village is 140 metres, this public highway has a national speed limit and does not benefit by pavement or streetlighting; but it is possible to navigate the public right of way footpath network from the golf club into the village. A notable feature of the local landscape is the imposing water tower seen from afar at the golf club.

2.0 The Proposal

- 2.1. This application seeks full planning permission for the change of use of land for siting of caravans. The initial number of lodges (caravans) proposed by the submission of this application was 57 twin unit holiday lodges with wraparound decks, shown by the drawing numbered BV/MP-1.0, received on the 26th of September 2022. The number of proposed lodges has been reduced during the course of the application’s determination to 38 twin unit holiday lodges with wraparound decks, shown by the drawing numbered BV/MP-2.0 received on the 27th of July 2023, and the red lined site area has been updated for the layout change by plan received on the 6th of November 2023. The 38-lodge layout does not specify the mix and arrangement of the proposed models of lodges.

2.2. There are details submitted for three types of lodges named as: the two-bedroom Bella Vista model, the three-bedroom Prestige Casa di Lusso model, and the two-bedroom Havana model.

-The Bella Vista lodge model has an internal floor area of approximately 81 square meters.

-The Casa di Lusso lodge model has an internal floor area of approximately 85 square meters.

-The Havana lodge model has an internal floor area of approximately 82 square meters.

Measurements taken not accounting for individual room sizes or including the wraparound decks.

2.3. The additional holiday lodges are proposed to be accessed via a 4-metre width driveway utilising the existing Sulleys Hill crossing point and linking to the turning circle of the existing nine lodges. Transport to and from the additional lodges would be by available electric powered golf buggies. Each of the additional lodges is proposed to be serviced by a dedicated electric charging point, and car parking for the lodge visitors will be accommodated by the golf course's existing car park. No details are given for the lodges' car parking, but the existing car park capacity is 150 vehicles. A traffic mitigation scheme is proposed for Noaks Road, Raydon Road, and Sandpits Lane. This includes the proposed creation of four additional vehicular passing places along the quiet lanes.

2.4. The orientation and placement of the lodges shown by the proposed site layout is indicative, but the general layout given for the driveway and perimeter planting would constrain the ability to adjust the lodges, that are generally shown as 10 metres apart from one another and not back-to-back.

2.5. Limited details have been submitted for the three types of lodges which are of different designs. The Havana lodge model is indicated to be finished by CanExel composite cladding, and has a single mono-pitched roof, the Casa di Lusso lodge model has two adjoining mono-pitched roofs, and the Bella Vista lodge model had a dual-pitched roof; all the models have a rectangular floorplan. No other precise details are given for the external materials and finishes of the proposed lodges, although the Design and Access Statement suggests that the lodges would be constructed from timber and would be finished in a palette of muted environmental colours, but no colour samples are given.

2.6. The site area specified by the application form is 8.8ha. This figure has not been updated to reflect the revised proposed site layout and number of lodges which now measures approximately 7.35ha.

3.0 The Principle Of Development

3.1 When making planning decisions, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that regard is to be had to the Development Plan and that the determination shall be made in accordance with the plan unless material consideration

indicates otherwise. The National Planning Policy Framework (NPPF) provides that the NPPF “does not change the statutory status of the development plan as the starting point for decision making. Proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise”. Babergh District’s adopted development plan is the newly-adopted Joint Local Plan (September 2023). These considerations alongside adopted Supplementary Planning Documents and the NPPF apply to proposals for new development within the Raydon parish.

- 3.2 Policy SP03 of the JLP underlines the spatial strategy, which only allows for development outside of settlement boundaries where: it is allocated for development, is in a made Neighbourhood Plan, in accordance with Paragraph 80 of the NPPF (2023) or is specifically permitted by other relevant policies that allow for new development in the countryside within the Joint Local Plan. The principle of this development is not considered acceptable in accordance with the relevant development plan policies because the proposal represents unsustainable development within the countryside, contrary to the objective of policy SP03 to resist new development in the countryside.
- 3.3 Table 5 setting out the other relevant JLP policies that may allow the development as an exception, directs attention to the most relevant policies LP12 – Tourism and Leisure Development and LP13 – Countryside Tourist Accommodation to the circumstances of this application for consideration.
- 3.4 However, without convincing and demonstrable justification given for an overriding need to expand the rural tourist accommodation at this scale at the established business Brett Vale Golf Club, the proposal cannot be taken to be in accordance with the exceptional allowance of these policies.
- 3.5 Furthermore, the application does not fully resolve and detail the dependency of the additional lodges upon the aspiration for the re-configuration of the 18-hole golf course layout or its phasing, and a sequential test for the golf club is required to direct the lodges away from risk of flooding. Although not within the National Landscape, given the site’s proximity, the new development is likely to have a negative impact upon the landscape’s scenic and tranquil qualities by consequence of the scale.
- 3.6 Consequently, the proposal presents a scheme that conflicts with the clauses of policy LP12 to:

“1. Proposals for new tourism and leisure facilities, or improvements/extensions to existing facilities, will be supported where they:
 - a) *Improve the Districts’ ability to attract and cater for visitors, increase local employment opportunities, enhance the vitality of places and provide for environmental improvements;*
 - b) *Improve the range, quality and accessibility of facilities;*

- c) *Are accessible by public transport and facilitates walking and cycling, whilst providing appropriate parking and access, and ensuring the associated traffic movement would not compromise highway safety;*
- d) *Include facilities which are open to the wider community, to enhance both accessibility and the range of facilities available;*
- e) *Respect the character of the landscape by having regard to landscape guidance that supports the development plan; and*
- f) *Follow a hierarchy of seeking firstly to avoid impacts, secondly mitigating for impacts so as to make them insignificant on the local ecology, biodiversity, trees and hedgerows, or thirdly as a last resort compensate for losses that cannot be avoided or mitigated.*

2.0 In addition to the criteria above, proposals outside settlement boundaries may be supported where the proposal:

- a) *Increases access, enjoyment and interpretation of the countryside, appropriately, sensitively and sustainably;*
- b) *Improves accessibility for existing places, which are not well served by public transport; and*
- c) *Is of an appropriate scale for their context.”*

3.7 General Development Management matters are found within the following JLP policies: covering matters of landscape (SP09, LP18); character (LP13 is relevant in this case); employment (LP09); infrastructure (SP08); local services (LP18, LP28); biodiversity (SP09, LP12, LP16); climate change (SP10, LP23); flood (LP27, SP10, LP23); accessibility (LP12, LP24, LP28) and sustainable travel (SP07, LP29). This list is by no means exhaustive as these considerations interweave with each other across the different policies.

3.8 The issue of employment is covered by policy LP09 (Supporting a Prosperous Economy), which states that “proposals for employment should be sensitive to the surroundings, including any residential and other amenity, landscape and heritage assets.”

3.9 LP09 does not ask us to consider expected job creation. In reality, on a much larger scheme, this might fall under “other material considerations” (although the likelihood is that such sites would be strategic and covered by Policy SP05). In this instance, the job creation is limited in any event.

3.10 LP09 gives criteria to measure the suitability of proposals generating employment opportunities. Considering the clauses of LP09, as will be seen elsewhere in this report, the proposal is not considered to be sensitive to its surroundings in terms of landscape.

3.11 In consideration that the site is adjacent to the National Landscape (formerly known as AONBs), JLP Policy LP18 states:

“The Councils will support non-major development within the AONBs and development within the setting of the AONBs that:

- a. Gives great weight to conserving and enhancing the landscape and scenic beauty;*
- b. Integrates positively with the character of the area and reinforces local distinctiveness of the AONBs;*
- c. Is sensitive to the natural and built landscape and visual impacts (including on dark skies and tranquil areas);*
- d. Supports the provision and maintenance of local services, facilities and assets (including affordable housing), so long as it is commensurate with the character and objectives of the AONBs;*
- e. Demonstrates special regard to conserving and enhancing landscape character, landscape values and heritage assets in the AONBs; and*
- f. Conserves the distinctiveness of the AONBs (including quality views), supports the public enjoyment of these areas and the wider social and economic objectives set out in the AONB Management Plans.”*

The development does not demonstrate this will be met, and the policy finds against the proposal. Moreover, its failure to do so conflicts with the expectation of Policy LP13 for the development to:

- “1. Outside settlement boundaries, applications for tourist accommodation will be considered on an exceptional basis. In addition, applications must:*
 - a) Demonstrate an overriding business need to be in that location;*
 - b) Be sympathetic to the character of the area*

In addition to criterion at 1 (a – c) proposals to extend or upgrade tourism accommodation must provide a balanced mix of economic, social and environmental benefits.”

3.12 JLP Policy SP07 - Tourism - directs that new sustainable tourism development that supports the tourism role of the settlements across Babergh and Mid Suffolk will be encouraged, where appropriate to the scale, character, and nature of their locality. In particular, proposals for historic, recreational, and landscape-based tourism that demonstrate protection of the historic and natural environment are to be supported by this policy.

3.13 Additionally, JLP Policy SP09 - Enhancement and Management of the Environment requires development to support and contribute to the conservation, enhancement and management of the natural and local environment and networks of green infrastructure, including landscape, biodiversity, geodiversity and the historic environment and historic landscapes. Through biodiversity net gain, all development is required to protect and enhance biodiversity ensuring the measures used will be resilient to climate change.

- 3.14 Policy SP10 - Climate Change - requires all development to mitigate and adapt to climate change by adopting a sequential risk-based approach taking into account future-proofing measures for impacts of flooding; conforming to the principle of holistic water management; applying existing and innovative approaches to sustainable design and construction; and Identifying opportunities, where appropriate, to deliver decentralised energy systems powered by a renewable or low carbon source and infrastructure.

4.0 The Rural Economy and Employment

- 4.1 Policy LP12 supports improvements/extensions to existing tourism and leisure facilities where, amongst other criteria considerations being met, the development it is of an appropriate scale for the context, and policy LP13 directs that outside of settlement boundaries, proposals for the extension or upgrade of tourist accommodation such as in this case will be considered on an exceptional basis. To be acceptable, such proposals must also provide a balanced mix of economic, social, and environmental benefits.
- 4.2 The application form details that the Brett Vale Golf Club currently employs 10 full time employees and 4 part-time employees and that the proposed expanded holiday lodge offering would increase the numbers to 25 full time employees and 9 part time employees and equates to a claimed rise to 33 full time equivalent roles from the existing 13 full time equivalent roles. Including staffing for reception, site management, clubhouse, functions, grounds maintenance, cleaners, and housekeeping.
- 4.3 It is noteworthy that these figures relate to the initially proposed 57- lodge scale of expansion and has not been revised to reflect the reduced proposed 38-lodge scale of expansion at the site. Therefore, it is not possibly to fully assess the employment benefits the expansion may bring.
- 4.4 Any uplift in employment for the installation of the new holiday lodges is likely to be negligible and not necessarily for locals, although there may be some employment servicing the lodges. The uplift to the rural economy is considered to be of minor scale.
- 4.5 As echoed by the comments received in consultation with the Suffolk Highway Authority, there is a potential concern that the additional lodges could have a harmful impact on highway safety. Mitigation measures for the increase in local traffic have been brought forward by a proposed highways improvement scheme to introduce four new passing places for the surrounding roads, and the highways team has recommended agreement of a construction management plan and improvement to the existing Sulleys Hill crossing point giving access across through the site. Therefore, the impacts of the lodges' expansion on highways safety are controllable by condition.
- 4.6 Similarly, the residential amenity impacts of the lodge expansion to the neighbouring properties can be controlled by condition relating to details of external lighting and foul water drainage on site. Please refer to section 11 for further assessment of the lodges' impact on residential amenity levels.

- 4.7 Despite the general support and encouragement of sustainable tourism given to leisure-based businesses, offering a diverse range of visitor accommodation and activities by policy LP12, it is noted that there have been concerns raised on the review of the 38-lodge scheme by the Economic Development and Tourism team in respect of density and scale of development in relation to the site location close to the National Landscape, and the issues arising from over-tourism around the National Landscape edge.
- 4.8 The applicant did submit a brief business plan which indicated the proposed allocation of funds from the sale of some holiday lodges to fund the purchase of further lodges. Our Economic Development Officer has advised that the submitted figures do appear to be reasonable. Therefore, in the crudest financial sense, the proposal does appear to stack up. However, there is no mechanism to ensure that the monies would be allocated thus.
- 4.9 There is also a lack of information in respect of the proposed management arrangements for the lodges and their relationship with the overarching business of the Brett Vale Golf Club required to understand if the proposal truly represents tourist accommodation offering a diverse range of activities. Only a high-level business need which alludes to re-development of the 18-hole course, economic benefit, and demand for such accommodation is given by the Design and Access Statement. This is a policy requirement to determine if the extended accommodation is acceptable.
- 4.10 There is no proposed phasing plan for how the lodge expansion would be delivered or how it would be fundamentally tied to the re-configuration of the 18-hole golf course, so there is a question over whether the lodge development itself would undermine the operation and viability of the core business activity. Without strong evidence to suggest otherwise, the proposal would be contrary to the expectations of NPPF Paragraph 187 which states that planning decisions should ensure that new development can be integrated effectively with existing businesses, without unreasonable restrictions to the business.
- 4.11 If the lodges were used, it is not certain that their occupiers would use the golf course or the restaurant at the site. Logically this may happen, but as the lodges could be used other than intrinsically as part of the golf experience, this cannot be guaranteed.
- 4.12 In conclusion to this section, whilst the proposal may result in revenue for the applicant, there is no assurance that this would assist the financial well-being of the golf course. There is also the risk that the proposal could undermine the existing activities at the golf course itself.

5.0 Nearby Services and Connections

- 5.1 The nearest settlements are Raydon (Hinterland Village) under half a kilometre northeast of the site; Shelley (Hamlet) approximately 1.5km to the northwest of the site, Higham (Hamlet) approximately 2.5km to the southwest of the site, Great Wenham (Hamlet) approximately 1.5km to the east, and Holton St Mary (Hinterland Village) approximately 1km southeast of the site. The closest core villages are Capel St Mary approximately 4.5km to the west, and East Bergholt approximately 3.5km to the southeast of the site on the opposing side of the A12. The historic town of Hadleigh the largest settlement is approximately 5km northwest of the site.

- 5.3 The nearest bus stop that could give the lodge visitors access to public transport is found at Raydon's Rectory Close approximately 300 metres from the Golf Club's Noaks Road access. However, the presence of the bus stop was not verified on the site visit and may no longer be available here.
- 5.4 As previously mentioned, there is no streetlighting or pavement along this road to the village; however, it is acknowledged that it has been designated as a quiet lane suitable for walking. A transport Statement has been prepared to support this application and proposes that walking or cycling will be encouraged as part of longer journeys via public transport over private car travel. It states that the needs of visitors will mostly be met by the clubhouse that has a bar and restaurant, and a small shop for basic short-stay provisions such as milk, bread, and other groceries. The facilities within Raydon are highlighted to be the church at 1.6km and the sports ground at 1.5km.
- 5.5 However, no detail is given for the availability of onward public transport locally at the cited 800 metres reasonable walking distance or average 6.1km cycle trip. Although it is perhaps feasible to reach the nearest settlements by foot or cycle, there is concern that they are not well served by public transport. For instance, it is unclear whether the bus service to/from Raydon village still operates.
- 5.6 Alternatively, there is the ability for visitors to use the Connecting Communities Babergh travel service, for which journeys may be booked for travel between the following villages: Aldham, Chattisham, Duke Street, Edwardstone, Elmsett, Flowton, Groton, Kersey, Lower Layham, Lower Raydon, Semer, Shelley, Polstead and Whatfield or into Hadleigh, where connections may be made for onward travel, in particular, to also connect with the 91 Ipswich/Sudbury service at Hadleigh. This gives a tangible service connection ability to reach onward public transport modes, but the booking complexity for connecting communities travel service does not cater well for tourists.
- 5.7 Overall, it is considered that the development site is not well-served by connection to existing local services and facilities other than to that provided by itself at the Brett Vale Golf Clubhouse. There is little realistic ability to enact the proposed sustainable travel via public transport modes. If the sole attraction is access to the golf course and its facilities, there is inadequate information in the way of a proposed Business Plan to outline what the relationship between the lodges and golf club would be long-term, and what their contribution to the re-development of the 18-hole golf course would be. Consequently, the proposal does not meet the fundamental expectations of JLP policy LP13.

6.0 Site Access, Parking and Highway Safety Considerations

- 6.1 Both the Design and Access and Transport Statements infer that the parking needs of the additional lodges can be accommodated by the spare capacity of the existing 150 vehicle spaces within the existing golf club serving its membership and staff. However, it was noted during the site visit that the existing lodges have access to their own private parking space by each lodge. It is suggested that each lodge will be served by an electric vehicle charging

point, which, although intended to supply top-up power to golf buggies, could facilitate private vehicle parking onsite.

- 6.2 This may, in turn, give rise to highways issues at the Sulleys Hill crossing point and could introduce a proliferation of vehicles on site, which would cause wider landscape harm to the AONB. However, the existing car park is now included and controllable by condition within the red line site, but a proposed parking layout has not been supplied for the location onsite of the pool of golf buggies.
- 6.3 It is also noted that the Design and Access Statement states that the development would be served by the Golf Club's existing vehicular access from Noaks Road; initially the redline site plan did not include either the existing car park or access driveway leading to Noaks Road. However, the revised site layout and updated red line plan now include the clubhouse, car park and driveway access from the Noaks Road to the golf course. As such, there is now less concern that the isolated parcel of land separated by Sulley Hills could be subdivided and served by its own access point.
- 6.4 The inclusion of the existing car park in the red line now demonstrates accordance with the parking standards for the additional lodges parking needs of the visitors, but does not address whether there would be sufficient capacity remaining to meet this and that of the golf course membership. Therefore, the development does not comply with expectation of policy LP12 and JLP policy LP29.

7.0 Design and Layout Considerations

- 7.1 It is important to note that the proposed lodge models are designed to meet the definition of a caravan and are not recognised as operational development. However, the change of use of the land within the red line site is to allow their siting on the land which requires planning permission. With that in mind, the density of the development is a key design consideration.
- 7.2 The maximum density considered appropriate for licensing of caravan sites is 60 caravans per hectare, discounting land where caravans cannot be sited. This proposed site layout would represent an acceptable low-density development to the degree that is in accordance with other relevant legislation applicable to caravan site licensing, but not in respect of the impact to the National Landscape.
- 7.4 Although the proposed density may be acceptable to licencing for caravans, the proliferation in the countryside of caravans that visually present as if they were buildings in the countryside, is not supported under other policies, in particular SP03. The lodges themselves are also of an inappropriate design for their immediate setting adjacent to the National Landscape, despite the specified muted colours for their cladding (composite). Concern has been raised by the AONB Project for their designs that feature large, glazed openings, where usually these are to be avoided or mitigated by provision of external screening or shutters to dampen obtrusive lighting.

7.5 Overall, the change of use sought to the land has the potential to diminish the recreational land's current positive contribution to the character of the wider landscape acting as harmonious space that can be appreciated from the public realm where the golf course, as a private use recreational space, is visible to the quiet lanes and public footpaths surrounding the site. The introduction of further lodges would diminish this quality as the space would appear less welcoming to the local community, it was observed that the nine lodges are signposted as private areas in the golf course, but those lodges are more setback from the public realm and well-contained within the golf course. Therefore, the encroachment of additional lodges of similar design closer to the quiet lane and towards the National Landscape would be harmful and does not respond to the local character of the area. Consequently, the proposal is considered to be of a disrespectful design and not in accordance with the expectations of JLP policies LP12, LP13, LP17, LP18, LP23 and LP24, and the NPPF.

8.0 Landscape Impact, Trees, Hedgerows, Ecology, Biodiversity and Protected Species

8.1 The proposed development of both the 57- lodge scale and arrangement or the later proposed 38- lodge revised offering is considered to be disrespectful to the surrounding landscape, in particular the adjacent National Landscape (formerly AONB). The visual and residual impacts of over-tourism in the context of the surrounding National Landscape is opposed by the AONB Project. These concerns are shared by the planning officer due to the need to safeguard the integrity of the National Landscape in respect of policy LP18.

8.2 The environmental impact of the expanded lodges, in particular to the National Landscape, remains a significant concern due to the scale and design of the proposal in such proximity to the National Landscape boundary and the likely impact the intensified tourist accommodation would have on the sense of tranquillity and scenic beauty of the landscape experienced where there is only a marginal buffer.

8.3 Although the AONB Project has recommended conditions for external lighting and use restriction, they have maintained a holding objection for the reduced 38-lodge scheme of development. In light of the national importance and protection afforded to the National Landscape due to its quality, the modest benefits brought to the rural economy by the increased employment and rural tourism do not outweigh the harm posed to the National Landscape that must be safeguarded in line with policy LP18.

8.4 It is considered that the golf course benefits from a large land holding and that alternative siting of the lodges within the grounds could be accommodated at a greater buffer distance from the National Landscape to lessen their impact. No justification is presented to demonstrate that the change of use of this land is the only feasible location to accommodate the additional lodges at the golf club (even if the proposal were acceptable in principle). Therefore, there is not an overarching business need identified to outweigh the harm posed by the development, and the proposal is considered to be contrary to the relevant policies LP12 and LP13.

8.5 Overall, the harm posed to the National Landscape is not outweighed by the modest increase in rural economy employment opportunities and the development is not

demonstrated to be desirable or appropriate rural tourist accommodation. Consequently, the proposal is not considered to be in accordance with the expectations of the Joint Local Plan policies SP07, LP09, LP12, LP13 and LP18.

- 8.6 Separately, the ecological consultant and Natural England have reviewed the supporting ecological survey and raised no objection to the development subject to the recommended conditions given. These are necessary to secure biodiversity net gain onsite in line with Policy LP16, and to ensure the mitigation and enhancement measures of the ecological survey are undertaken. As financial contribution per lodge would also be required for the Recreational Avoidance Mitigation Strategy (RAMS) of the Suffolk Coast European Site, due to their location in its Zone of Influence. Please note that a financial contribution has not been received ahead of the case's determination.

9.0 Land Contamination, Flood Risk, Drainage and Waste

- 9.1 The application is supported by a suitable land contamination report that has been reviewed by the council's appropriate Environmental Health Team with no objection raised subject to conditions.
- 9.2 The application form specifies that the development would be served by a private package sewage treatment system. No precise details have been given by the Design and Access Statement or shown upon the proposed site layout drawings to indicate where this would be situated onsite. The Environmental Health Team has recommended a condition to agree details for foul drainage.
- 9.3 The application form specifies that a sustainable drainage system would be used for the development, a cross sectional drawing is given for the construction of the driveway, and the scheme is supported by limited information in the Design and Access Statement for drainage.
- 9.4 The Design and Access Statement provides a high-level flood risk assessment with maps for the site, which is in Flood Zone 1 but does include areas of and liable to surface water flooding risk.
- 9.5 A further comprehensive site-specific flood risk assessment has been supplied during the course of the application and has informed the revision to the proposed lodge layout to distance the caravans from the areas of land shown by figure 5 of that report to be vulnerable to flooding. This has been reviewed by Suffolk County Council's Water and Floods Team as the appropriate Lead Local Flood Authority (LLFA) and has been judged to be insufficient information with discrepancies now between the mapping within the report using the 57- lodge layout and the 38- lodge layout. The LLFA has also highlighted the need for a sequential and exceptions test to be carried out as required by the NPPF, because the proposal would introduce a more vulnerable use (residential) to the site currently in recreational use, which is identified as being at risk of surface water flooding.
- 9.6 Please note that these lodges, which are designed to meet the definition of a caravan (albeit with additions) are categorised by the NPPF Annex 3: Flood risk vulnerability

classification; to be development that is more vulnerable to risk of flooding. Falling within *'Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan.'*

- 9.7 It is notable that the flood risk assessment does not include a sequential and exceptions test for the site and the proposed development and does not provide details for flood risk across the wider golf course. The applicant has not identified whether there are any other 'reasonably available' sites within the area of search by the information contained in the flood risk assessment and technical notes. Consequently, the planning officer has relied on the limited information presented for the site area and access to the council's GIS mapping tools to assess the suitability of the wider golf course.
- 9.8 From the information and material available, the E.A flood mapping suggests that there are pockets of land peppered across the entire golf course that are vulnerable to surface water flooding, often where there are natural or engineered valleys within the topography or ponds. Looking for alternative options to locate the development away from flood risk there does appear to be a similarly proportioned area to that of the 8.8ha site where the golf course holes numbered 6, 7, 8, 9, 10, and 11 appear to be situated to the south of Wades Lane nearby Mount Pleasant.
- 9.9 Consequently, the development proposal fails to demonstrate that it meets the sequential test, and there is no need to carry out the exceptions test because another reasonably available site option to accommodate the proposed development has been identified within the search area, and for this reason it would be contrary to the NPPF and JLP policy LP27 for which they direct not to allow this proposed development.

10.0 Heritage and Historic Environment Considerations

- 10.1 Neither of the nearest neighbours to the site the dwellings known as Pippens and Snow Downs is identified as a designated heritage asset, and there is no indication of archaeological interest.
- 10.2 It is noted that there are several grade II listed buildings in the wider surrounding area: namely, those located within the nearby National Landscape. These are Sulleys Manor, Granary Barn, and Threshing Barn situated approximately 300 metres to the northwest of the site and accessed off Sulleys Hill. The nearby listed buildings not within the National Landscape: Lark Hall and Holton Place, which are situated at a distance approximately 600 metres to the southeast of the site, are accessed off Sandpitts Lane.
- 10.3 These buildings, although not all wholly visible, are considered to contribute to the scenic quality of the surrounding landscape and the impact of the development to their wider setting is not fully appreciated; although a landscape impact assessment is undertaken there is limited information provided for the design of the individual lodges and if they have any impact to the assets' setting. It is noted that there is a reliance upon the existing perimeter tree planting to mitigate visibility of the lodges, and that the trees on site are predominately deciduous and will lose leaf during winter.

11.0 Impact upon Neighbouring Residential Amenity

- 11.1 As initially submitted, the 57-lodge scheme had a layout that spread the development across the entire portion of the isolated land southwest of Sulleys Hill, forming part of the development site. That arrangement brought the tourist accommodation into close proximity of both the nearest neighbouring dwellings known as Pippens and Snow Down. The supporting Design and Access Statement does not address the potential for impact of the development on these properties. Although there is less likelihood of loss of privacy by virtue of the established planting onsite, there has been little allowance given for of a stronger buffer between the lodges and properties.
- 11.2 The reduced 38-lodge layout relocated the lodges within the isolated piece of land towards the south, so that the distance from Pippens is approximately 200 metres but the proximity to Snow Down is unchanged and the proposed change of use of the land from recreational to residential would be undefined by either potential arrangement but is described by the red line site extent.
- 11.3 Therefore, the final outcome of the development's arrangement is not controllable, as the lodges meet the definition of a caravan and could be re-positioned elsewhere onsite which would make mitigation of any neighbouring residential amenity impacts arising from the change of use difficult. To be able to truly control and mitigate the impact, the red line site area needs to be reduced so that there is an adequate distance afforded between the residential properties and change of use, so that the land between still serves unchanged recreational purposes as part of the golf course.

12.0 Parish Council Comments

- 12.1 Objections raised by the parish councils were on the grounds that the development is of inappropriate scale adjacent to the National Landscape and would give rise to harm to the special qualities of the landscape from light and noise pollution, be of harmful impact to local wildlife, and that the increased traffic movements would cause highways safety issues. Also, that the proposal does not accord with the development plan policies and is contrary to the objective of JLP Policy SP03 to resist new development in the countryside.
- 12.2 All of these matters raised by the Parish Councils have been addressed in this report.

PART FOUR – CONCLUSION

13.0 Planning Balance and Conclusion

- 13.1 In consideration of the above material planning matters, the proposal is found to be contrary to the Development Plan and should be refused planning permission.
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- 13.2. The proposed development for change of use of recreational land used as part of an 18-hole golf course, to allow the siting of holiday lodges which are designed to meet the definition of a caravan and to act as an expansion to the existing nine holiday lodges (caravans) at the Brett Vale Golf Club, that is located within the countryside regarded by planning policy to be an unsustainable location to host new development, is contrary to the development plan because the proposal does not convincingly and demonstrably meet an overarching business need that would outweigh the harmful impact posed by the development to the adjacent National Landscape and surrounding landscape. This is contrary to the Joint Local Plan Policies SP03 c), and LP12 and LP13.
- 13.3 The proposed expansion of holiday lodges would intensify an existing ancillary tourism offering to that of the core business activity, and there is a lack of information in respect of the speculative redevelopment of the 18-hole golf course which is not included within the description of works seeking planning permission and cannot justify the need for the holiday lodges. Therefore, the proposal does not accord with the Joint Local Plan policies SP03, SP07, and LP13.
- 13.4. An intensified offering of tourist accommodation without redevelopment of the 18-hole golf course sufficiently detailed and secured by planning permission could lead to business conflicts arising in consideration of the NPPF paragraph 187 that planning decisions should ensure that new development can be integrated effectively with existing businesses, without unreasonable restriction to the business. Therefore, the holiday lodges should not undermine the core business.
- 13.5. The proposal does not sufficiently detail that the parking standards will be met for all of the development both lodges and club, so therefore does not accord with Joint Local Plan policy LP29.
- 13.6 The proposal has failed the sequential test required by the NPPF paragraph 167 and does not demonstrate that this is the only reasonably available to host the development. Therefore, this more vulnerable development at risk of surface water flooding should not be allowed and is contrary to Joint Local Plan policies SP10 and LP27, as well as the NPPF paragraph 167.
- 13.7 There is also an insufficient strategy for the disposal of surface water.

RECOMMENDATION

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

- The new development in the countryside is contrary to SP03 c) and LP12 and LP13 listed by table 5 as policies permitting development outside settlement boundaries, subject to the developments accordance with their details which this proposal is not considered to have sufficiently demonstrated.
- Potential for conflict arising between the intensified use of the site and the core business activity (18-hole golf club) that could undermine its viability contrary to the NPPF paragraph 187.
- Insufficient details to demonstrate parking standards are met for all development contrary to LP29.
- The proposal has failed the sequential test required by the NPPF paragraph 167 and does not demonstrate this is the only reasonably available site within the golf club to host the development. Therefore, introduction of a more vulnerable use to a site at flood risk is contrary to SP10 and LP27.
- Insufficient strategy for the disposal of surface water.
- Lack of RAMS payment.

And the following informative notes as summarised and those as may be deemed necessary:

“The proposal has been assessed with regard to adopted development plan policies, the National Planning Policy Framework and all other material considerations. The NPPF encourages a positive and proactive approach to decision taking, delivery of sustainable development, achievement of high-quality development and working proactively to secure developments that improve the economic, social and environmental conditions of the area:

In this case the Local Planning Authority attempted to discuss its concerns with the applicant but was not able to secure the necessary improvements to the scheme that would have enabled the proposals to be considered more favourably.”