

**LOCATION**

Glebe Farm  
Church Road  
Ellough  
Beccles  
Suffolk  
NR34 7TR

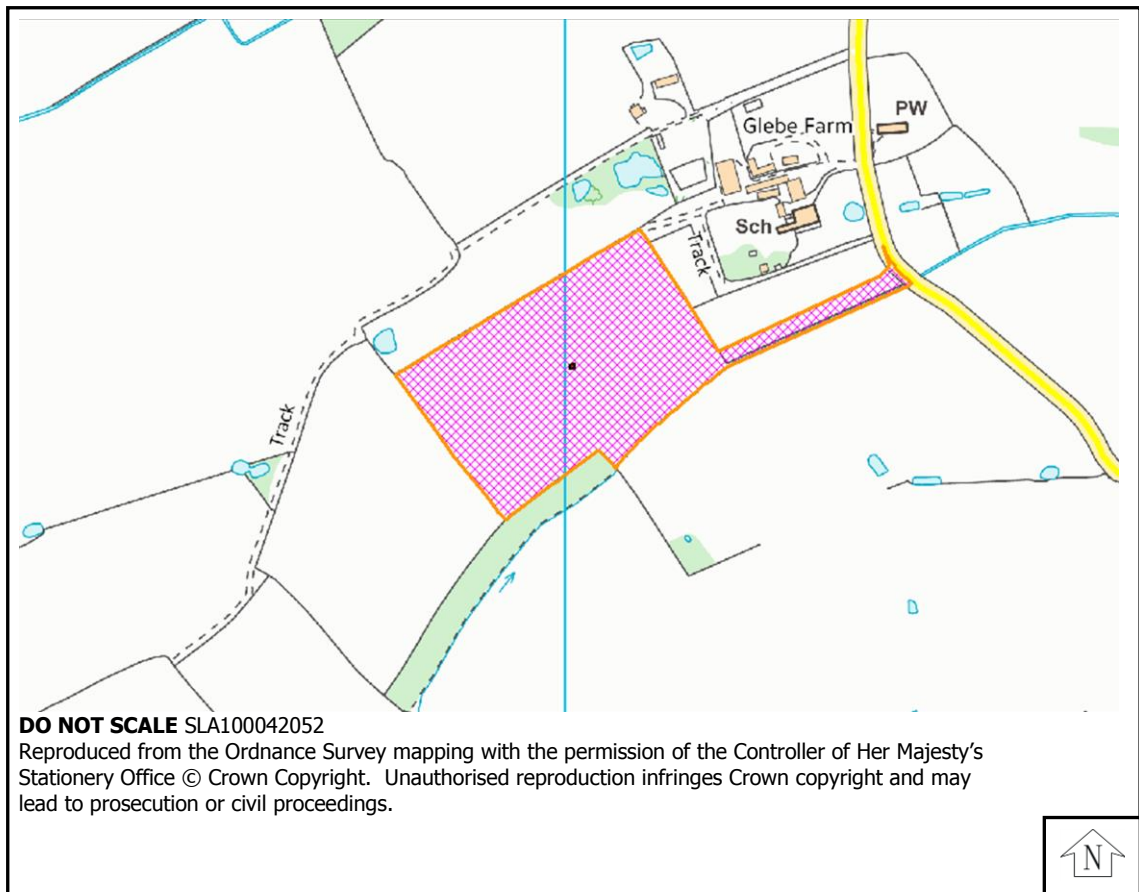
**EXPIRY DATE** 19 October 2018 (EoT 14 November 2018)

**APPLICATION TYPE** Full Application

**APPLICANT** Mr Gerry Skilton

**PARISH** Ellough

**PROPOSAL** Change of use of agricultural land to land for the siting of 21 holiday lodges and warden's lodge; construction of an access road, parking spaces, hardstanding bases, infrastructure and associated landscape planting.



**1 SUMMARY**

1.1 This application seeks consent for 21 (reduced from 46 originally) holiday lodges and a warden's lodge. There are two listed buildings in fairly close proximity to the site; The

Grange and All Saints Church and the site falls within the Waveney District Landscape Character Assessment area H3 Hundred River Valley Tributary Farmland.

- 1.2 It is acknowledged that there would be some benefits arising from this application to the local tourist industry from increased accommodation and to the local economy from increased visitor spending. However it is considered that these benefits do not outweigh the harm caused to the setting of designated heritage assets and to landscape character.
- 1.3 The application is therefore recommended for refusal.
- 1.4 The application is referred to Committee following a Member call-in and as a major application.

## **2 SITE DESCRIPTION**

- 2.1 The site lies to the west of Church Road which is a single-track road connecting Benacre Road at Ellough Airfield to Sotterley. The land in question is not directly adjacent to Church Road as it occupies a position further to the west that is segregated by a field/paddock and associated field boundaries.
- 2.2 The proposal site slopes slightly to the north and benefits from established boundary hedging to the east, separating it from the field/paddock adjacent to Church Road. From a southern perspective, there is a footpath that affords views into the site where the boundary hedge is somewhat fragmented.
- 2.3 A Grade II listed dwelling (The Grange) lies to the north of the application site and the All Saints Church lies slightly further afield to the north east. Aside from the dwelling to the north, the site is surrounded by open countryside.

## **3 PROPOSAL**

- 3.1 The original submission sought a change of use of agricultural land for the siting of 46 holiday lodges, and warden's accommodation, and associated infrastructure and landscaping. The scheme was subsequently amended to 21 holiday lodges and warden's accommodation and associated infrastructure and landscaping, in order to address issues and concerns raised by various consultees.
- 3.2 The revised scheme proposes the 21 holiday lodges in an alternative layout, combined with large areas of the wider site retained for use as a meadow and additional space provided for landscape planting.
- 3.3 The exact type of lodge is not known at this stage although they are described as being attractive single storey timber lodges that would be ordered from New Forest Log Cabins. The log cabins technically comprise caravans by virtue of being assembled off-site and assembled in two main parts, in accordance with the definition of caravan under the Caravan Sites and Control of Development Act 1960. An example of a typical lodge has been submitted (Kingsfer Lodge) which has dimensions of approximately 12m x 7m with a height to the ridge of 4m.
- 3.4 The application is supported by the following documents:

- Planning Statement
- Preliminary Ecological Appraisal
- Flood Risk Assessment
- Transport Note and Addendum Transport Note
- Desk-Based Heritage Assessment
- Desk Study & Preliminary Risk Assessment

## 4 CONSULTATIONS/COMMENTS

### 4.1 Neighbour consultation/representations

Eight neighbouring properties were notified of the application. 22 objections to the original proposal for 46 lodges were received and ten objections to the revised scheme for 21 lodges raising the following points:

- Harmful to the character of attractive countryside
- Additional traffic generated on unsuitable narrow country road
- No shops or services in the area
- No cycle paths/footpaths along the road
- No street lighting
- No mains drainage
- Inappropriate area for tourism
- Contrary to local plan policies DM10, DM24, DM27 and DM30 and the NPPF
- Harmful to the setting of listed buildings The Grange and All Saints Church
- Noise and light pollution
- Unsustainable site
- Harmful to wildlife

### 4.2 Parish/Town Council Comments Comments on the revised scheme for 21 holiday lodges:

*Shadingfield, Sotterley, Willingham & Ellough Joint Parish Council strongly opposes the above planning application and would cite the following grounds for objection :*

- *The proposed development is adjacent to The Grange which is a grade 2 listed building and close to Ellough Church which is a Grade 1 listed building. [Heritage]*
- *The proposed development for 21 holiday homes located on the southern half of the land is not in keeping with the local area.*
- *Vehicle access to the site is along a narrow country lane which is not suitable for such increased traffic. It is anticipated that holiday makers would pre-order groceries from national supermarkets and this in turn would increase traffic and would not benefit the parish commercially. This lane also forms part of the national cycle route and increased non-local traffic would increase hazards to cyclists. The increased non-local traffic would undoubtedly cause further damage to grass verges and kerbside drainage. [Heritage and Scheme Specifics]*
- *The old grassland dates back to the 1950s and is a haven for barn owls and badgers. There are several bat colonies in the area of the Church. The proposed development would completely change the current environment. [Environmental landscape impact]*

*The Council would also make reference to the following WDC Policies:*

*DM 10 Natural Environment*

10.3 ....Instead PPS7 guidance requires Local Development Frameworks to include policies that resist development that would have a detrimental impact on the landscape. It suggests that criteria based landscape policies should provide adequate protection for the whole District without the need for rigid local designations which may unduly restrict sustainable development in rural areas.

Council believes the proposed development would have a detrimental impact on the landscape.

*Policy DM16 - Housing Density*

*Proposals for residential development will be permitted provided that the development makes best use of the site in a manner that protects or enhances the distinctiveness and character of the area and takes into account the physical environment of the site and its surroundings*

*7.4 In assessing what density is appropriate, a flexible approach will be necessary to ensure that making efficient use of land does not result in development that detracts from the character of the area. While promoting innovative designs and layouts, the precise density will be determined having regard to the site's accessibility, immediate context, on-site constraints, the type of development proposed and the need to provide an appropriate mix of house types and sizes to meet the community's needs.*

Council believes the proposed development would contravene the above.

*Policy DM24 - Touring Caravan, Camping and Permanent Holiday Sites*

*Proposals for new or extensions to large-scale touring caravan and camping sites will generally be acceptable when contained within the landscape and outside the Area of Outstanding Natural Beauty.*

*Proposals for new or extensions to small-scale touring caravan and camping sites will only be acceptable when contained within the landscape and outside the Heritage Coast. Wherever possible, existing buildings should be used for the accommodation of associated permanent tourist facilities.*

*New or extensions to existing permanent holiday sites will only be permitted subject to the following criteria:*

- Proposals should be contained within the landscape and the site is not situated within the Area of Outstanding National Beauty, the Heritage Coast or on land that would have adverse impacts on these areas;*
- The layout retains natural on-site features or provides compensatory planting and other nature conservation measures elsewhere within or near the site; landscaping integrates the development with its surroundings and creates a high quality environment within the site;*
- For new sites, the provision of on-site commercial, recreational or entertainment activities should form an integral part of the scheme and be located away from other sensitive uses in the locality;*
- The provision of a variety of accommodation types, densities and informal layout groupings.*

Council believes the proposed development would contravene the above.

### *Permanent Holiday Sites*

*8.11 By their nature permanent sites, which include static caravan parks, chalets, cabins and other sites of a permanent nature, can be difficult to contain in the surrounding landscape. However, extensions can provide the opportunity for improving general layouts and appearance of sites in some cases and will add to tourism provision. Such developments also need to be considered in relation to their potential use throughout the year.*

*Council believes that the proposed development would be seasonal and not benefit the community for twelve months of the year.*

### *Policy DM27 - Protection of Landscape Character*

*Proposals for development should be informed by, and be sympathetic to, the distinctive character areas, strategic objectives and considerations identified in the Waveney District Landscape Character Assessment.*

*Development proposals should demonstrate that their location, scale, design and materials will protect and where possible, enhance the special qualities and local distinctiveness of the area.*

*Proposals that have an adverse effect will not be permitted unless it can be demonstrated that they cannot be located on alternative sites that would cause less harm and the benefits of the development clearly outweigh any adverse impacts.*

*Development affecting the Broads Area and the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and their settings, Rural River Valley and Tributary Valley Farmland areas will not be permitted unless it can be demonstrated there is an overriding national need for development and no alternative site can be found.*

*Council believes that the proposed development would not comply with the above criteria.*

### *Policy DM30 - Protecting and Enhancing the Historic Environment*

*Development proposals, including alterations and extensions, should preserve or enhance the character and appearance of Conservation Areas, protect the architectural or historic interest including the setting of Listed Buildings, Historic Parks and Gardens, and any other important historic buildings, structures, monuments and landscapes including locally important buildings identified by Waveney District Council in the 'Local List', and their settings through high quality, sensitive design.*

*Council believes that the proposed development would not comply with the above criteria.*

*Parish Councillors have been approached by a number of local residents who are all opposed to the proposed development and such residents have been encouraged to write independently to the planning authority.*

### **Consultees**

- 4.3 **Anglian Water** Recommends a condition requiring the submission of a foul water strategy.
- 4.4 **Suffolk Fire And Rescue Service** request that adequate provision is made for fire hydrants, by the imposition of a suitable planning condition at the planning application stage.

- 4.5 **SCC Flooding Authority** No objection subject to conditions.
- 4.6 **Suffolk County - Highways Department** In summary, the proposed developments impact on highway safety and cumulative impacts on the road network, are not such that SCC as LHA could recommend refusal on highway grounds.
- 4.7 **Suffolk County - Rights Of Way** No objection
- 4.8 **Suffolk Wildlife Trust** were consulted on the 27 July 2018.
- 4.9 **Economic Regeneration (Internal)** Recommend approval
- 4.10 **Historic England** Comments on revised proposal (summarised):

In our previous advice we concluded that development of the application site would change the character of this part of the setting in a way that would result in harm to the historic significance of the listed parish church in terms of the National Planning Policy Framework.

The applicant states that the revised proposal reduces the impact on the setting of the church and the harm along with the harm to its significance. The Council will have to consider the impact of this on the grade II listed Rectory but we would accept that the impact on the setting of the parish church would be less than in the previous proposals. We remain of the view that development of the application site could lead to harm to the significance of the listed church. As previously stated this would be a less than substantial degree of harm so the Council should weigh any public benefit delivered by the proposed holiday lodges against this harm before determining the application.

- 4.11 **WDC Environmental Health - Contaminated Land** Advises conditions requiring the submission of a noise management plan and dealing with contaminated land.

## 5 PUBLICITY

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

Category	Published	Expiry	Publication
Adjacent to Listed Building, Public Right of Way Affected, Listed Building,	18.05.2018	7.06.2018	Beccles and Bungay Journal
Adjacent to Listed Building, Public Right of Way Affected, Major Application,	18.05.2018	07.06.2018	Lowestoft Journal

## SITE NOTICES

The following site notices have been displayed:

General Site Notice	Reason for site notice: Adjacent to Listed building, In the Vicinity of Public Right of Way, Major Application, Date posted 11.05.2018 Expiry date 31.05.2018
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## RELATED APPLICATIONS

Reference No	Proposal	Decision	Date
DC/11/0087/FUL	Change of use of land to allow siting of 10 timber holiday lodges and 1 timber Reception lodge together with new access from the highway, parking for cars (alongside each new lodge), new trackways, landscaping and horse paddock areas with new timber post and rail fencing.	Approved	June 2011
DC/14/1917/FUL	Renewal of DC/11/0087/FUL	Approved	October 2014
DC/15/4836/DRC	Discharge of Condition No.12 of DC/14/1917/FUL	Refused	January 2016
DC/17/3640/DRC	Discharge of Conditions 3, 4, 8, 9, 11 & 18 of DC/14/1917/FUL	Approved	October 2017

## 6 PLANNING POLICY

- 6.1 The National Planning Policy Framework (2018) and National Planning Policy Guidance (NPPG) forms a material consideration in the determination of this application in particular those areas of guidance relating to supporting a prosperous rural economy (Paragraph 83).
- 6.2 The Waveney Core Strategy was adopted in 2009 and contains the following policies of relevance to the determination of this application:
- CS01 sets the Spatial Strategy for the District and states that areas outside the towns and larger villages will be regarded as open countryside where the objective is to preserve the countryside for its own sake.
  - CS13 covers tourism. It states that new tourist accommodation should be developed in locations that have good public transport links and will normally be located in or close to Lowestoft and the market towns or the larger village coastal resorts of Corton and Kessingland.
- 6.3 The Development Management Policies were adopted in 2011. The following policies are relevant:

- DM01 sets down design principles for new development proposals.
- DM24 sets criteria for new build tourist accommodation where this is appropriate.
- DM27 seeks to protect landscape character.
- DM30 seeks to protect and enhance the historic environment.

6.4 The Waveney Local Plan Final Draft (Regulation 19) March 2018. Policy WLP8.15 deals with new self catering tourist accommodation. Medium sized sites (11-79 pitches/units) will require good access to A or B roads.

## **7 PLANNING CONSIDERATIONS**

7.1 The main issues to consider in the determination of this application are:

- (i) The principle of tourism and the planning history of the site.
- (ii) The impact on designated heritage assets
- (iii) The landscape impact
- (iv) Highway considerations

### **Principle of Tourism**

7.2 The importance of tourism to the local economy is recognised. Core Strategy Policy CS13 states, in part, that The District Council will work with partners to promote and secure sustainable tourism development. A more diverse and high quality tourism offer will be encouraged that seeks to lengthen the tourism season, increase the number of visits, provide job opportunities and sustain the tourism economy. However this growth should not be at the expense of the natural and cultural assets on which it is based.

7.3 Policy CS13 goes on to say “New tourist accommodation and attractions should be developed in locations that offer good connectivity with other tourist destinations and amenities, particularly by public transport, walking and cycling. New tourism development will normally be located in or close to Lowestoft and the market towns, the larger village coastal resorts of Corton and Kessingland, and other villages where local services, facilities and public transport reduce the need to travel by car. Outside of these locations new-build development will not normally be acceptable. The focus will be on the conversion of existing buildings and development that contributes to farm diversification.”

7.4 With regards to the planning history of the site application DC/11/0087/FUL permitted ten timber holiday lodges and 1 reception lodge. Behind each holiday lodge was a paddock and it was anticipated that the development would prove particularly attractive to visitors who own horses to “provide them with a base from which to venture out on horseback in the local area”.

7.5 The Committee Report for DC/11/0087/FUL concluded as follows:

*“It is acknowledged that this is a somewhat borderline case. There would certainly be some tourism benefits from this proposal, and the applicant’s agents comments on the specific*



*market being targeted by this scheme are noted; on the other hand the development would have some visual impact on the countryside and its compliance with policy as a sustainable location is marginal at best”.*

- 7.6 The low density of the previous scheme was a mitigating factor. It is considered that the previous scheme was primarily to accommodate horses in relation to each holiday lodge so the site being located in a relatively unsustainable rural location could be seen to have had some justification due to the welfare of the animals and the desire to be in an area suitable for riding out from. It is considered that such justification does not apply to the current application.

#### **Impact on designated heritage assets**

- 7.7 When commenting on the original proposal for 46 holiday lodges Historic England were of the view that that development of the application site would change the character of this part of the setting (of the listed parish church and nearby Rectory) in a way that would result in harm to the historic significance of the listed parish church in terms of the National Planning Policy Framework.
- 7.8 Historic England’s comments on the revised scheme for 21 lodges will be noted in Paragraph 4.26 above. They remain of the view that the revised proposal could lead to harm to the significance of the listed church. This would be a less than substantial degree of harm so the Council should weigh any public benefit delivered by the proposed holiday lodges against this harm before determining the application.
- 7.9 The setting of the Church and the Grange is of an isolated and rural agricultural character, which are important factors to the way the buildings are and have been appreciated in the past and are perceived. These elements contribute to their significance with a strong connection to the surrounding farmland.
- 7.10 The revised proposal of 21 holiday lodges, plus wardens lodge and maintenance shed is more than a 100% increase in the number of units over the existing consented to scheme. The Council’s Design and Conservation Officer is of the view that this will increase the impact on the setting of the listed buildings and will detract from the significance of the assets.
- 7.11 The experience of using the Public footpath No E-565/002/0, which borders the site, will change when approaching the Listed buildings as the character of the valley will change from the farmland to an intensive holiday home development. This in an unexpected location will detract from the appreciation of the listed buildings in their rural surroundings.
- 7.12 It is recognised that the revised plan for 21 units plus warden's lodge and maintenance shed is not “as harmful” to the setting of the listed building of the Grade II Listed the Grange and the Grade I Listed building of All Saints Church and as the initial plan for 46. However, the impact of 21 units (and associated works) is still considered to cause harm which is highly negatively.
- 7.13 The NPPF advises that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset (as is considered to be the case

here), this harm should be weighed against the public benefits delivered by the proposed holiday lodges.

- 7.14 It is considered that the intensive nature of the revised scheme is so alien to the rural countryside which surrounds the site and provides the valley setting for both The Grange and the Church and views from the adjacent public footpath that it will have a very negative impact.

### **Landscape impact**

- 7.15 This site falls within Waveney District Landscape Character Assessment area H3 Hundred River Valley Tributary Farmland. As such, Policy DM27 states that there is a fundamental opposition to development unless a national need and no alternative sites can be demonstrated.
- 7.16 The site is currently a relatively small grassland field/paddock in a rural landscape of medium/small scale field pattern which is typical of the prevailing landscape character area. It is further described as a tranquil, unified landscape with a strong rural character. Farm diversification leading to landscape change is noted as a potential future change to landscape character, and the primary strategic objective for the landscape character area is to conserve and enhance the textured landscape quality. In relation to development, building styles and uses within rural areas should respect local character, and development should aim to conserve the views to and setting of churches.
- 7.17 The revised scheme for 21 new lodge type buildings and a Warden's lodge plus maintenance shed, are all now located in the southern half of the site. The site is divided east/west by a new native species hedge and the northern part is proposed as amenity meadow with tree planting. Despite the reduction in lodge numbers, and the inclusion of meadow area, it is considered that this still represents a notable change in landscape character, now quite concentrated in a smaller area, still with parked cars, mown grass, roadways and other related holiday making outdoor activity and therefore still of adverse impact on landscape character. It is acknowledged that it is of a reduced area, but now more concentrated and is considered unacceptable.
- 7.18 Accordingly therefore the proposal is considered to be contrary to Policy DM27 for reasons of adverse impact on landscape character, and the setting of Listed buildings, and because no overriding national need has been demonstrated and it is highly likely that there are more suitable alternative sites for development of this nature.

### **Highway Considerations**

- 7.19 The Highway Authority have made the following observations:
- the site's location is far from ideal from a sustainable transport point of view;
  - the single-track road access is not ideal for an increase in traffic; and
  - there will be an impact on the safe and quiet nature of the single-track road for the present road users, including cyclists and walkers
- 7.20 Notwithstanding these observations the Highway Authority do not object to the application making the following comments:

- i. it does not appear that the proposed 21 lodge development would have an impact on highway safety significant enough to warrant a recommendation for refusal on highway grounds, and
  - ii. it does not appear that the residual cumulative impacts on the road network would be severe enough to warrant a recommendation for refusal on highway grounds.
- 7.21 The Highway Authority have made further observations regarding the traffic that would be generated and question some of the applicants assumptions. The Highway Authority are of the view that the likely cumulative increase in traffic from 21 lodges can be estimated to be 109 movements per day (bringing the total to 327 per day). Whilst this is considered to be significant the capacity of the road is considered by the Highway Authority to lie somewhere between 1200 vehicles per day and 4800 vehicles per day. 327 vehicles per day would represent the single-track road operating at somewhere between 7% and 27% of capacity.
- 7.22 The Highway Authority conclude that the estimated “traffic generated by the development is capable of being accommodated on the surrounding transport network”. Accordingly it is considered that there is no justification to oppose the proposal on highway grounds.
- 7.23 Policy WLP8.15 of the Final Draft Local Plan supports the provision of new self catering tourist accommodation although medium sized sites (11-79 pitches/units) will require good access to A or B roads and public transport. Church Road, off which the application site is accessed is a single track C Class Road (C924). Other roads in the vicinity of the site are Hulver Road to the north and Jays Hill to the south east. Both these roads are also C class roads (C922 and C963 respectively). It is therefore considered that the application site does not have good access to A or B roads contrary to Final Draft Local Plan Policy WLP8.15 which can be given weight in the determination of this application

### **Planning Balance**

- 7.24 It is acknowledged that the revised proposal for 21 lodges is a significant improvement on the original proposal for 46 lodges. It is however more than double the previously approved scheme for 10 holiday lodges. The density of the proposal in the southern part of the site is greater and there are no accompanying horse paddocks with the units. With the previously approved scheme it would be expected that such a development would require a location adjacent to quiet roads and a network of off-road bridleways and byways. However it is considered that there is no such justification with the current application. As noted above it is considered that there are more suitable alternative sites for development of this nature.
- 7.25 There would be some benefits arising from the proposed development of 21 holiday lodges as they would increase the amount of holiday accommodation in the District which would benefit the local economy through increased visitor spend. However these benefits have to be balanced against the harms that would be caused. Officers have concerns that the revised proposal represents an alien feature within this area of attractive countryside and that it would adversely impact on the setting of heritage assets and landscape character. Accordingly it is considered that the adverse impacts of the proposal would significantly and demonstrably outweigh the benefits.

## **8 CONCLUSION**

- 8.1 The proposed development of 21 holiday lodges and wardens lodge together with access road, parking spaces, hardstanding bases and infrastructure is considered to have a negative impact on the setting of the grade II listed rectory and the parish church and an adverse impact on landscape character. The application is therefore recommended for refusal.

## **RECOMMENDATION**

That the application be REFUSED for the following reasons:

1. The proposal would have an adverse impact on the setting of the Grade II Listed the Grange and the Grade I Listed building of All Saints Church contrary to Development Management Policy DM30 and fails to meet the test in paragraph 196 of the National Planning Policy Framework as it is not considered that the harm caused by the proposal would be outweighed by the benefits.
2. This site falls within Waveney District Landscape Character Assessment area H3 Hundred River Valley Tributary Farmland. The proposal would have an adverse impact on this landscape character contrary to Development Management Policy DM27.
3. The site is accessed of Church Road, a C Road (C924). Roads in the vicinity of the site are also C roads (Hulver Road C922 and Jays Hill C963). The proposal is considered contrary to Final Draft Local Plan Policy WLP8.15 which requires proposals for medium sized self catering accommodation (21-79 pitches/units) to have good access to A and B roads and public transport.

## **BACKGROUND INFORMATION:**

See application ref: DC/18/1838/FUL at [www.eastsuffolk.gov.uk/public-access](http://www.eastsuffolk.gov.uk/public-access)

## **CONTACT**

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