

Shotley Parish Council- planning comments re. planning application DC/18/00873 - Land adjacent to Frog's Alley, Shotley – *Partial change of use to provide glamping and to facilitate event hosting; Erection of an outbuilding to provide toilet/shower facilities and storage capacity in connection with existing vineyards.*

The Shotley Parish Council would like to strongly recommend the refusal of this planning application on the following grounds:

1- The development proposed in this application would be against the National Planning Policy Framework and Babergh's planning policies (Local Plan and Core Strategy), as well as the principles that safeguard the integrity of this Suffolk Coasts and Heaths AONB, SSSI and Ramsar sites.

2- The development proposed would be in extreme close proximity to the Grade II listed St. Mary's Church, the parish cemetery and the Commonwealth War Graves Cemetery.

3- The point of access is a Class C single track country lane, exposed to the harsh weather of a coastal village and not maintained. It is partly privately owned and is not only unsuitable for such an undertaking, it is also discouraged from use due to its proximity to the adjoining SSSI and Ramsar site.

4- There does not appear to be provision for organised waste disposal/refusal collection or sewerage disposal.

5- Planning is being sought for events 365 days a year with little or no clarification on number of visitors/patrons, pet arrangements, numbers per tent or per event, parking arrangements in excess of suggested 10, types of events proposed, management/supervisory arrangements for the events, measures to mitigate incidents of public nuisance/order, risk assessments or emergency plans due to location.

6- Health and Safety principles do not seem to have been taken into account in this mix of agricultural and tourism activities on the same site (spraying of crops, agricultural traffic, flammable materials, social gatherings of unknown quantity, possible lighting of fires, etc).

7- The mix of materials and size/type of structures proposed, as well as some of the potential activities on the site are not in keeping with the surrounding area and will have an adverse impact on local amenities and heritage.

8- The very small settlement area around the Church, War Graves and existing vineyards is extremely peaceful, tranquil and unspoiled with beautiful views over the river Orwell. The proposal to open the area to overnight camping with associated facilities and organised events all year round will be in serious detriment to the area. Furthermore, the landscaping scheme being suggested will detract significantly from the existing views.

9- Although the applicant does not provide traffic generation or management data, the proposed development would greatly increase highways safety concerns, as currently the access from the B1456 is only used by the small number of residents that live there and the

usual service providers. The suggested provision of ten parking spaces is inadequate and the additional traffic movements and congestion which would result from the various activities would exacerbate safety concerns for vehicles and pedestrians alike, as well as dangerously limit accessibility to emergency vehicles.

10- There appear to be some discrepancies in some of the evidence provided, such as the Ecological Appraisal and the proposals considered at a previous site visit. There is no noise impact assessment included in the proposals nor restrictions to the size and nature of events.

A significant number of questions regarding the management of the operation and the site itself remain unanswered and would need to be addressed in order for any further considerations to be made by this Parish Council, which is committed to supporting new business ventures and tourism in the area.

However, we need to ensure that any proposals do not jeopardise what has already been achieved by the many local enterprises, businesses and volunteer groups which make Shotley the special destination that it is.

When considering this planning application, the Shotley Parish Council has taken into account the following planning policies and guidelines:

NPPF (National Planning Policy Framework)

(10) Meeting the challenge of climate change, flooding and coastal change

(11) Conserving and enhancing the natural environment

(12) Conserving and enhancing the historic environment

- This development would not contribute to or enhance the natural and local environment, its valued landscapes or geological conservation interests
- It would create unacceptable levels of noise and pollution, as well as physical waste
- It would adversely affect the landscape and scenic beauty of this Area of Outstanding Natural Beauty
- The proposed development abuts land within a Site of Special Scientific Interest and a Ramsar site and is likely to have an adverse effect on both
- It would have a considerable impact in this area of tranquillity, which has remained relatively undisturbed by noise and is prized for its amenity value and would give rise to significant adverse impacts on health and quality of life as a result
- The proposed development is in an area at risk of flooding
- The proposed development would not be making a positive contribution to local character and distinctiveness and in fact could represent a threat to nearby heritage assets such as the Grade II listed St Mary's Church and the Commonwealth War Graves Cemetery

Babergh Local Plan (alteration no. 2) 2006

- **EN01-** The proposed development is likely to have a material adverse impact on this Ramsar Site, Site of Special Scientific Interest and Area of Outstanding Natural Beauty
- **EN04-** the proposed development may negatively affect the protection and/or retention of existing natural features on the site, including wildlife corridors
- **EN08-** The proposed development is likely to affect the safeguarding and conservation of the unique character and ecology of the Orwell Estuary
- **EN11-** The proposed development is within an area at risk from flooding and may also increase the risk of flooding elsewhere
- **EN17-** Waste disposal/collection, pollution prevention measures, appropriate washing facilities, and other pollution mitigation measures or proposed solutions are either insufficient or non-existent. This is also a concern if this is to be a new employment development, which is not clear at this point
- **HS28-** The site should remain undeveloped as an important feature in visual or environmental terms and the proposal represents overdevelopment to the detriment of the environment, the character of the locality, residential amenity or highway safety; the proposal is of a scale, density and form which would be out of keeping with adjacent and nearby dwellings or other buildings, particularly heritage assets
- **CR01-** In order to protect landscape quality and character of the countryside, a new development should seek to be: of a scale compatible with its surroundings; have due regard to the landscape characteristics and cultural heritage of the locality; be sensitively designed with high standards of landscaping, layout and careful choice of materials to minimise impact; considering measures that will maximise the potential for wildlife on the site and adjacent areas; not introducing a proliferation of buildings and structures; well related to the highway network, including where possible, pedestrian links, cycle routes and public transport. The proposed development has clearly not taken these very important aspects into account or put in place effective proposals to mitigate any of the impacts likely to be caused.
- **CR02-** The landscape of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty should be safeguarded through the strict control of development and unless

there is an overriding need for this particular development and no alternative site be available, such developments should not be allowed.

- **CR21**- Proposals to provide new facilities in villages should only be supported where they improve the quality of life for the local community and where they do not lead to any material adverse impact on the environment and residential amenity, which this proposal clearly does
- **CN01**- The development is not of appropriate scale, form or design and construction materials are not appropriate for the location
- **CN03**- The proposed development would lead to the loss of a visually important open space and would dramatically alter the village scene in that area
- **Shotley Peninsula and The Suffolk Coast and Heaths-** (8.27) *The Suffolk Coast and Heaths Management Strategy (2002) covers the Shotley Peninsula. This locality is within the Suffolk Coast and Heaths Project area, which includes parts of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty. The policies contained in that document are in line with the aims and objectives of this Local Plan. The Strategy has been adopted by the District Council as Supplementary Planning Guidance.*
- **RE06** *Proposals for recreation facilities and change of use to recreation in the countryside which are small or medium-scale may be acceptable, subject to no adverse impact on: the character of the locality; road safety; landscape character, particularly in Areas of Outstanding Natural Beauty; (...) listed buildings and residential amenity. Recreational uses and facilities will not be permitted if they introduce or are likely to lead to the introduction of new buildings, structures or landscape features which would detract from the character of that particular tract of countryside. Unfortunately, this application appears to “tick all the boxes”!*
- **RE08**- *All recreational provision in the Suffolk Coast and Heaths Area of Outstanding Natural Beauty area (exceptions noted) will be **expected to be low key in nature and aimed primarily at improved and sustainable public access.** Landscape character, biodiversity and agricultural considerations will predominate. Large scale recreational development and other major visitor developments will not be permitted.*
Camping/Caravanning – Touring Sites- (8.33) *There may be a need for additional facilities. These facilities **should normally be located outside important landscape areas** (such as Areas of Outstanding Natural Beauty) but close to areas to which tourists would be attracted*

- **RE12- Touring caravan and camping sites will only be permitted where there is good access to main roads. Proposals must demonstrate that there will be no adverse impact on the character of the locality, road safety, landscape characteristics, biodiversity, cultural heritage or residential amenity.**

(8.36) The Stour and Orwell Estuaries are regional resources for water-based activities, located within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty. **They are both designated as Special Protection Areas, Ramsar Sites and Sites of Special Scientific Interest.** They are recognised as being of international importance, because of the over-wintering wildfowl they support.

(8.38) Alongside others who have particular interests in the Stour and Orwell Estuaries, the District Council has developed a sustainable management strategy for these **internationally important areas**. The Stour and Orwell Estuaries Management Plan (2004) will be used to help assess proposals for development within the Stour and Orwell Estuary areas. The District Council will also refer to the Management Scheme for the Stour and Orwell Estuaries European Marine Site when dealing with recreational proposals that may **affect the favourable condition of the estuaries**.

(8.39) Policy EN08 (see Chapter 2 of the Plan) refers to the **need to protect the landscape and ecological characteristics of these important estuaries**.

Supplementary Planning Document (SPD) on Rural Development & Core Strategy Policy CS11 (adopted 8th August 2014) and Babergh Local Plan 2011-2031 Core Strategy & Policies (Part 1 of New Babergh Local Plan) February 2014

- **Policy CS1:** The presumption in favour of sustainable development should seriously be considered by the planning department on this occasion, as material considerations do indicate that the **adverse impacts of granting permission would significantly and demonstrably outweigh the benefits when assessed against the policies in the National Planning Policy Framework taken as a whole or specific policies in that Framework indicate that development should be restricted.**
- **Policy CS11:** Strategy for Development for Core and Hinterland Villages- the proposed development is not appropriate in size / scale, layout and character to its setting and to the village; is not well related to the existing pattern of development for that part of the settlement and would have a considerable impact on the historic environment, including designated heritage assets and their settings (such as the St Mary's Church and the Commonwealth War Graves Cemetery); It also does not meet any proven local need and could potentially set a precedent that would have a number of negative repercussions.
- **Policy CS15:** Implementing Sustainable Development in Babergh- The proposed development:

- is not in keeping with the local context and character of the area
- does not demonstrate the principles of sustainable development
- is not sympathetic with the landscape, landscape features, heritage assets, important spaces and historic views
 - does not make a positive contribution to the local character, shape and scale of the area and will in fact detract from it
 - does not appear to protect or enhance biodiversity or ensure that any risk of contamination is identified and adequately managed
 - does not appear to address climate change through design, adaptation, mitigation or by incorporating or producing sources of renewable or low-carbon energy
 - does not appear to incorporate measures to manage and mitigate flood risk and does not minimise surface water run-off and incorporate sustainable drainage systems (SUDs) where appropriate;
 - does not minimise the demand for potable water in line with, or improving on government targets
 - does not minimise the energy demand of the site through appropriate layout and orientation and the use of building methods, materials and construction techniques that optimise energy efficiency and are resilient to climate change (eg. resilience to high winds and driving rain)
 - does not seek to minimise (and in fact increases) the need to travel by car using the following hierarchy: walking, cycling, public transport, commercial vehicles and cars) thus improving air quality
- **Policy CS17:** Rural/coastal historic villages, such as Shotley play an important role in tourism and leisure within the district and appropriate new developments that support this role should be encouraged.

However, such new developments should be assessed in relation to whether the benefits they bring to the local economy and to the specific village are sustainable and outweigh any considerable negative impact on local heritage, amenities and resources. This is clearly not the case with this particular application.