



St Edmundsbury
BOROUGH COUNCIL

DEV/SE/16/14

Development Control Committee

4 February 2016

Planning Application DC/15/1899/FUL

West Stow Anglo-Saxon Village and Country Park

Icklingham Road, West Stow

Date	28 September	Expiry Date:	28 December 2015
Registered:	2015		(extended to 11 January 2016)
Case Officer:	Sarah Drane	Recommendation:	Approve
Parish:	Culford, West Stow and Wordwell	Ward:	Risby
Proposal:	Planning Application – Provision of 100 pitch touring caravan and camping site including reception building, utility block, access off highway, inner roads and hardstandings, drainage, ancillary services and landscaping (Re-submission of DC/15/0556/FUL)		
Site:	West Stow Anglo Saxon Village and Country Park Icklingham Road, West Stow		
Applicant:	St Edmundsbury Borough Council		

Synopsis:

Application under the Town and Country Planning Act 1990 and the (Listed Building and Conservation Areas) Act 1990 and Associated matters.

Recommendation:

It is recommended that the Committee determine the attached application and associated matters.

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Background:

This application is referred to the Committee because St Edmundsbury Borough Council is the applicant. It is a major application and is recommended for approval.

A site visit is proposed to take place on Thursday 28 January 2016.

Proposal:

1. Planning permission is sought for a 100 pitch touring caravan and camping site within the existing country park. The site covers approx. 3.21 hectares and would be open from March to October each year. The layout includes a reception building to provide the main reception for the site, office, staff toilet, store and plant room (measuring 6m wide x 21.3m long and 3.55m in height) and a service block of the same size and design. The block includes male/female toilets/showers etc, family/accessible shower room and toilet, laundry and wash up areas.
2. A new access off the main road would serve the site, with barrier control. A new electricity substation is also proposed by the entrance. The access leads to a temporary parking area to enable new arrivals to check in at reception. Adjacent to the reception and service block is a sewage treatment plant, refuse/recycling centre and collection area and waste water disposal point. The access continues round to the eastern side of the site to access the pitches. Another access from the entrance to the west serves further pitches. Additional drinking water, fire and waste water disposal points are around the site. The existing gravel track/footpath running along the southern side of the site is retained, with an additional break out area for campsite users to play ball games, have picnics etc. on the southern side of the track. New stock fencing will enclose the site with pedestrian gates on the southern side to enable site users to access the Country Park.
3. The application has been amended since submission to better define the red line of the application site, previously shown as orange.
4. The proposals are a resubmission of a previously withdrawn scheme for a 180 pitch site in the same location (albeit a larger site – 6 hectares). Several concerns were raised during the consultation process which led to the application being withdrawn. This current application seeks to address the previous concerns raised.

Application Supporting Material:

5. Information submitted with the application as follows:
 - Site location plan
 - Proposed plans
 - Design & Access Statement
 - Photos
 - Flood risk assessment
 - Ecological Appraisal

- Environmental Statement
- Heritage Statement
- Phase II Environmental Assessment report

The applicant has also provided the following supporting statement:

'West Stow Country Park provides 52 Ha free play area, nature trails and walks through woodland and around the lake/river for members of the public and their children. The Visitor Centre, gift shop, Anglo Saxon museum and village currently offers employment to the equivalent of 6.3 fulltime Council employees. West Stow Country Park is large enough to accommodate a greater number of activities and its location of natural beauty lends itself to be developed as a one stop destination for camping and caravanning. It is the aim of this proposal to result in a sustainable income stream being generated into the foreseeable future to aid in developing and supporting the on-site activities.'

With investment in the proposed campsite it is envisaged that campers will form a captive audience which will enable the existing Visitor Centre, cafe and events revenues to increase. Camping therefore offers an excellent way of increasing repeat visitors who will not only pay through pitch prices to stay overnight but also have secondary spend in the visitor centre and the cafe. The aim is to change the Country Park attraction from a subsidy position to one of being a net contributor to the council's finances and the success of the campsite will have a positive effect to the ongoing financial viability of the West Stow visitor attraction and other local attractions which will benefit from the accommodation provided by this scheme.'

Site Details:

6. The site is situated within the grounds of West Stow Country Park, on the eastern side, adjacent to the existing car park area. West Stow Country Park is around 1.2km west of the village of West Stow, and approximately 6km north-west of Bury St Edmunds. West Stow Country Park consists of 52 hectares of woodland, lakes, heathland, and grassland with visitor facilities including a car park and visitor centre. There is a reconstructed Anglo-Saxon village within the Country Park to the west.
7. Grassland on the eastern side of the Country Park was previously used as a landfill site and prior to that as a sewage farm. The grassland currently is little used for recreation and part of it is used as an overflow car park for events. The grassland is largely semi-improved species poor with smaller areas of semi-improved acid grassland. To the north, a boundary belt of pine trees separates the grassland from the Icklingham Road, and to the east an access track to a disused historic pump house separates the site from the adjacent Thetford Forest. The western side of the grassland adjoins the main carpark and similar grassland within the Country Park.
8. Breckland Special Protection Area (SPA) is adjacent to the north, east and close to the west of the proposed campsite. The SPA was designated for its breeding populations of stone-curlew (primarily on heaths and arable land), nightjar and woodlark (both primarily on heaths and forestry

plantation). The component of the Breckland SPA close to the north and east of the proposed campsite is Breckland Forest SSSI, which is designated (in part) for its breeding nightjar and woodlark.

9. Breckland Forest SSSI is adjacent to the north and east of the proposed campsite. Breckland Forest SSSI was designated for its breeding populations of nightjar and woodlark, rare plants, invertebrates, geology, and red squirrels. Woodlark and nightjar nest within areas of the forest which have been clear-felled, and continue to use the area until the replanted trees grow too tall, at which point they move to the next clear-fell area on rotation. Currently there are sensitive clear-fell areas to the north and the east of the campsite. Rare plants tend to be found on forest rides or in other areas of permanent open habitat, and invertebrates are found primarily in permanent and temporary open habitats. Geological interest is within a small number of disused gravel pits, and red squirrels are now considered to be extinct within the SSSI.
10. West Stow Heath SSSI is around 450m to the west of the proposed campsite, and partly within the Country Park. The SSSI was notified for its heathland, grassland and woodland vegetation, with rare plant species present.
11. Lackford Lakes SSSI is to the south of the proposed campsite. It was designated for its wintering water birds and for dragonflies and damselflies. Much of Lackford Lakes SSSI is also a nature reserve owned and managed by Suffolk Wildlife Trust.

Planning History:

12. DC/15/0556/FUL - Planning Application - (i) 180 pitch touring caravan and camping site (ii) reception buildings and 2no. utility blocks with associated accesses, drainage, hardstandings and landscaping - withdrawn

Consultations:

13. Highway Authority: No objection subject to conditions

Environment Team: No objection

Public Health & Housing: No objection

Suffolk County Council Drainage: No objection subject to a condition

Suffolk County Council Archaeological Service: No objection subject to conditions

Environment Agency: No objection subject to conditions

Suffolk County Council Public Rights of Way: No comments or observations but note that there is a long distance promoted walking route that passes through the proposed development area, the St Edmund Way

Suffolk Wildlife Trust: Have raised a number of concerns which include:

- The tranquil nature of the area is a key factor to its attractiveness to visitors – this proposal will undermine this.
- Site boundary note clear with submission of orange and red lines.
- No detail in application regarding site operating times, so no certainty it would be adhered to or control over it being breached.
- LPA need to be sure there will be no adverse impact on the SPA.
- No detail given on plans in relation to preventing adverse impacts on the SSSI (as set out in the Ecological Appraisal) or how, when and where such measures will be delivered
- Program of wardening of riverside footpath needs to be secured and implemented
- Could other reptile habitat creation be delivered to mitigate loss of habitat on the site?
- Further assessment of water vole presence must be undertaken
- Specific details on monitoring and mitigation measures are not included within the submission. Given that these details are required to make the development acceptable, these details should be provided upfront.

SWT initially objected to the development – they considered the proposals would still result in adverse impacts on nearby designated sites.

In response to these comments the applicant has provided further details. Officers consider that the concerns raised above have been largely addressed and where further information is required, this can be secured by condition.

Suffolk Preservation Society: raise concerns in relation to the proposed break out area not being justified and consider development should be to the north of the access track only. The felling of the trees to enable visibility for the access will thin the screening of the development from Icklingham Road, so additional planting should be provided.

Natural England: No objection subject to conditions

Conservation Officer: No objection

Forestry Commission:

- *Displacement. The appraisal does not acknowledge the lack of information on displacement of nest territories in a Breckland context. And therefore how this may impact on woodlark and nightjar.*
- *Nightjar Monitoring Detail. It does not specify monitoring details for nightjar as it does for woodlark.*
- *It falsely assumes an HRA has been carried out for the roadside parking on the southern boundary of Kings Forest.*
- *When considering in-combination effects with other projects and plans for the HRA it refers to the current Kings Forest FDP, which is currently being re-designed and will soon be superseded.*
- *The Forestry Commission would like to fully discuss and agree visitor and bird monitoring details with St Edmundsbury District*

Council. This should include timing, frequency and period details etc.

RSPB: object – insufficient evidence provided to demonstrate that adverse effects on designated wildlife sites can be avoided.

Ecology Tree & Landscape Officer: In summary, the proposals are considered to have some harmful effects on the landscape and biodiversity and these need to be weighed against the benefits of the scheme. A Habitats Regulations Assessment (HRA) has been undertaken and has concluded that Likely Significant Effects can be screened out so long as the mitigation measures including monitoring which are proposed as part of the project are secured and implemented.

Representations:

14. Culford, West Stow & Wordwell Parish Council: object – concerned about the adverse impact the proposal could have on wildlife in the area.

15. A number of representations (51 in total at the time of the publication of this report) have been received from local residents raising the following concerns:

- The site is very close to Lackford Lakes
- Increase in noise in this quiet countryside location
- Lack of facilities for visitors
- Proximity of the river – accident waiting to happen especially if children are about
- Proposed fencing would not be adequate
- Country park would be made smaller as a result leaving less space for visitors and local people to enjoy.
- Site is not right for a campsite, but one is needed locally.
- Natural environment of great significance to wildlife so should be left alone
- Would destroy a valuable Breckland habitat and buffer zone between Lackford Lakes and the forest.
- Intrusive infrastructure proposed
- Other nearby campsites would become unviable
- Additional dogs to the site will affect wildlife
- Increased traffic along a busy and fast road
- Light pollution
- Proposals are only to prop up failing tourist attraction – this is not the way to address the failings of the existing country park.
- Adverse impact on landscape and landscape character
- Proposals are contrary to Council's own policies
- Proposals will result in increased litter which will need to be managed.
- Too many pitches proposed
- No benefit to the local community
- 24hr operation will impact on wildlife
- A campsite would destroy the existing parks assets; peace, tranquillity and unspoilt habitat
- Would be better to expand existing campsites
- There are no other amenities within walking distance of the site

- Phenomenal set up cost to bringing electric, water, sewage plus archaeological dig on the site.
- Local roads are not safe/suitable for walkers/cyclists
- Loss of habitat to many species
- Forecast profit on this venture highly debatable
- Questions over the business case for the venture
- How will the site be protected from travellers when the site is not in use?
- Alternative income streams for the Country Park need to be considered
- Loss of 30 trees to enable visibility at the access – this is environmental vandalism for financial gain.
- What would happen if bird numbers decreased as a result of the development?
- Facilities not sufficient for number of pitches proposed (eg only 4 showers)
- A campsite will put off visitors coming to the Country park
- Unsustainable location, with no links to public transport and no other amenities within walking distance.
- Proposals are contrary to policy

16. One letter of support has also been received stating that area would benefit from a site like this run by The Caravan Club or The Camping and Caravan Clubs.

Policy: The following policies of the Joint Development Management Policies Document and the St Edmundsbury Core Strategy December 2010 have been taken into account in the consideration of this application:

17. Joint Development Management Policies Document:

- DM1 – Presumption in favour of sustainable development
- DM2 – Creating places
- DM5 – Development in the Countryside
- DM10 – Impact of development on site of biodiversity and geodiversity importance
- DM11 – Protected Species
- DM12 – Mitigation, enhancement, management and monitoring of biodiversity
- DM13 – Landscape Features
- DM34 – Tourism Development
- DM44 – Rights of Way

18. St Edmundsbury Core Strategy December 2010

- CS2 – Sustainable development
- CS3 – Design & Local Distinctiveness
- CS13 – Rural Areas

19. Rural Vision 2031

- RV1 – Presumption in favour of sustainable development

Other Planning Policy:

20. National Planning Policy Framework (2012)

- core principles

- Section 3 – Supporting a prosperous rural economy
- Section 7 – Requiring good design
- Section 11 – Conserving and enhancing the natural environment

Officer Comment:

21. The issues to be considered in the determination of the application are:

- Principle of Development
- Design & layout
- Landscape impact
- Habitat Regulations Assessment
- Impact on designated sites and protected species
- Access and rights of way through the park
- Impact on highway safety
- Economic considerations

Principle of development

22. The National Planning Policy Framework states that planning policies should support economic growth in rural areas and promote sustainable rural tourism and leisure developments that benefit business in rural areas. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations. It is considered that encouraging additional visitors to the site has a knock on effect for the wider area, benefiting other local tourist attractions, visitor accommodation, public houses etc and should be promoted.

23. Policy DM34 states that proposals for tourism development (including overnight accommodation like campsites) will be permitted provided certain criteria can be met. The principle of a campsite in the rural area is acceptable, but matters of detail relating to location, design & layout, landscape impact, impact on designated sites and protected species, impact on highway safety and economic considerations will be assessed in more detail below.

Design & layout

24. The design and layout of the site has evolved since the submission of the last withdrawn application (see planning history above). The site has been reduced almost by half and is now confined to the north east corner of the Country Park. The access point was chosen to ensure minimal removal of trees. The substation is required close to the entrance to enable easy servicing and connection to existing services. The reception and service block are also grouped together close to the entrance to minimise the wider visual impact on the site of new buildings. The blocks are single storey with monopitch roofs to minimise their scale and provide a simple form. The materials proposed are larch cladding, brick plinth, with hardwood doors which are considered appropriate for the rural location.

25. The layout does not provide a complete looped access around the site. This is to reduce hardstanding and try and maintain a natural appearance around as much of the site as possible. Pedestrian gates on the southern side of the site provide access to the Country Park and a break out area to ensure ball games, picnics etc. are confined within a less sensitive area. The design and layout of the site is therefore considered appropriate for

the proposed use and how it relates to its surroundings.

Landscape impact

26. West Stow Country Park and the proposed camping and caravan site are located within a 'special landscape area' as defined by the St Edmundsbury Local Plan. The site is within Breckland and is shown in the Suffolk Landscape Assessment to lie on the boundary between the 'estate sandlands' and the 'valley meadows and fens' landscape character type. One particular feature of Breckland is the tranquillity of the landscape. The introduction of a camping site at this location is likely to have a negative impact; particularly during the summer evenings and mornings; times when previously there have been few visitors within the park. There is potential for the introduction of this scale of development to undermine the high value environmental assets which make the area so attractive to visitors.
27. The Norfolk and Suffolk Brecks Landscape Character Assessment has been prepared as part of the Brecks 'Breaking New Ground' project that gives detailed information on the landscape of the Brecks. The study also locates the site within the Brecks on the edge of the 'River Valleys' character area and lists the 'intimate, tranquil landscape' as a distinctive landscape characteristic. The study goes on to identify the erosion of the intimate, tranquil character of the river valleys as a result of increased visitor and recreational pressure as a principal force of landscape change. The landscape strategy does however go on to recommend that visitor pressures are managed at popular and sensitive sites by investing in high quality infrastructure and interpretation (educational information such as leaflets and information boards which help visitors understand the value or the environmental assets), which meets the different needs and levels of use of a range of visitors.
28. In winter the camp site will be closed and unused and this could have a negative effect on the amenity of the site when compared to the current situation.
29. A sandy soil bund is proposed on the northern boundary of the site for the benefit of reptiles. The height of this feature is given as 50cm and as such it will have little impact on landscape character or amenity.
30. The proposals require the removal of a number of trees to assist highway visibility. It would be appropriate to replace the trees along this boundary to ensure a sustainable visual softening of the site from the road for the future. This would also assist in the screening of the site from the SPA. It would also address previous concerns raised by Suffolk Preservation Society. The applicant has agreed to ensure the implementation of such planting. A condition is proposed to secure related details.

Habitat Regulations Assessment (HRA)

31. The application site is in close proximity to Breckland Special Protection Area (SPA), and therefore has potential to affect its interest features. European sites are afforded protection under the Conservation of Habitats and Species Regulations 2010, as amended (the 'Habitats Regulations'). Natural England has confirmed that following review of the current

application (reduced area and number of pitches proposed) they are satisfied that previous advice has been taken into account in the current submission and that sufficient mitigation has now been included. However there is a requirement that all the mitigation measures set out in the 'Ecological Appraisal August 2015' are to be implemented.

32. Whilst Natural England has confirmed that they consider that any effects on the SPA are unlikely to be significant they have commented that given there are records of birds associated with the SPA and clear-fell areas within 400m of the proposed site, coupled with a lack of information in the public domain on the recreational behaviour of visitors within large campsites, it is not possible to rule out effects to the birds entirely, particularly since campsites predominantly operate within the bird breeding season. Natural England has requested that the proposed visitor monitoring programme (and the concurrent nightjar and woodlark survey) as outlined in sections 4.2.37 and 4.2.44 of the ecological report is secured and that any subsequent mitigation measures will be implemented should adverse effects to the SPA be identified. The potential mitigation outlined in the ecological appraisal includes:

- camp site visitors requested not to visit that part of the forest through signage and leaflets given to campers on entry
- other visitors to the forest requested not to visit that part of the forest through signage
- temporary closure of layby parking adjacent to the clear-fells in agreement with Forestry Commission

33. The Forestry Commission has separately commented on the planning application. In relation to any bird monitoring and visitor survey; they would like to fully discuss and agree the details of this with the Council.

34. Further to this the applicant has amended the potential mitigation that would be delivered in the event that monitoring indicated a need to reduce visitor levels. This is detailed in the 'Amendment to Ecological Appraisal: 8th December 2015'. The ecological appraisals suggested mitigation to request that campers do not visit that part of the forest through signage and leaflets given to campers on entry remains the first approach to mitigation. However the proposals to use signage within the Forest, and temporary closures of layby parking may not be possible to secure as it requires agreement and co-operation with the Forestry Commission. The remedial action which is now proposed would be to reduce the number of pitches on the camp site for a temporary period until the end of the bird breeding season, which can be done by not accepting further campers until campers present on the site leave at the end of their stay. This is under the control of the applicant and does not rely on third party actions. The applicant has confirmed that they would be committed to implementing this mitigation. Natural England has agreed to this change to the potential mitigation and the approach that the applicant has submitted.

35. The monitoring as detailed above would need to be conditioned. This will need to ensure that the agreement of Natural England is embedded in the condition and that the Council liaises with the Forestry Commission on the bird monitoring and visitor survey as they have requested.

36. The Country Park currently closes at 8pm however the Park will remain open for campsite visitors, who due to the layout of the Park and having access, will be able to walk within the Park on public footpaths after 8pm. The park provides alternative greenspace for visitors to use so diverting visitors from sensitive forest clear-fell areas.
37. Lighting on the site will be limited to the vicinity of the service buildings, and the fire points. There is potential for this feature of the site to impact on the SPA now and in the future as has been highlighted by the RSPB in their consultation response. The applicant has added additional screen planting between the camping site and the forest clear fell areas to help mitigate any impacts. This can be secured by condition as part of new soft landscaping proposals. Details of any external lighting should also be conditioned.
38. The application includes the removal of a number of trees on the northern boundary of the site between the proposed camp site and the existing clear-fell area to provide a highway sightline. The applicant has submitted proposals to include additional tree planting to ensure that a sustainable vegetative screen is maintained. Planting implementation and maintenance can again be secured by condition.
39. In consideration of all the above matters, the HRA concludes that 'Likely Significant Effects' can be screened out, provided the proposed monitoring and mitigation measures are secured and implemented.

Impact on designated sites and protected species

40. Extensive discussions took place with both Suffolk Wildlife Trust and Natural England prior to the resubmission of this application. The Council's Ecology Officer has carefully assessed the submitted information. The Country Park at West Stow and the surrounding areas are of very high nature conservation value although the proposed camp site itself is of lower value as a habitat and for species. This is further demonstrated by the number of designated sites of European and National significance. These include Breckland SAC, Breckland SPA, Breckland Forest SSSI, West Stow Heath SSSI and Lackford Lakes SSSI. In addition there are a number of local designations which include Thetford Forest Park County Wildlife Site and Lackford Lakes which is also a Suffolk Wildlife Trust Nature Reserve. There are also a large number of species records relevant to the site and immediate surroundings.
41. A site survey has been undertaken to identify the habitats and protected species potentially affected by the proposals. A management plan is required for the site and this will need to include details on the management of the bund to the northern boundary – the applicant has suggested what the management of these feature might include however the detail can be agreed by condition.
42. In relation to bats, these have been adequately dealt with on the site.
43. In relation to reptiles; whilst the measures identified appear sufficient to prevent construction activities from killing or injuring any reptiles present,

the proposed campsite will result in the loss of a significant area of habitat suitable for reptiles. The following mitigation is proposed: creation of a bund along the northern edge of the campsite; tree clearance elsewhere within the Country Park which has already created habitat suitable for reptiles; and improvements and continued positive management of the field to the west of the application site for reptiles. Nevertheless there will still be a net loss in habitat. The measures in the ecological appraisal including the reptile mitigation strategy will need to be implemented. The strategy must also be applied to areas where there is to be localised changes to levels.

44. Water voles are known to be present on this stretch of river and are likely to be utilising suitable habitat on both banks. There is therefore a strong possibility that any disused burrows could come back in to use. Before any works in the vicinity of the river bank are undertaken, further assessment of water vole presence must be undertaken. This can be secured by condition through the implementation of the measures in the ecological appraisal.
45. The re-positioning of the application site (compared to the previous application) is likely to lessen effects to Lackford Lakes SSSI as it is now separated from the application site by the existing grassland with intermittent planting and the existing track bank. The site plan indicates (via a note) that there should be intermittent planting on the southern boundary of the site, details of which can be secured by condition.
46. It is also necessary to condition the operating times for the camp site so that visitors may only occupy pitches between March and October. The restricted timescale for operation is considered to be fundamental to the acceptability of the camp site in respect to the potential impact on overwintering birds at Lackford Lakes.
47. The ecological appraisal makes a number of recommendations relating to preventing adverse impacts on the SSSI. This includes the strengthening of the planting between the two sites and reinforcing riverbank vegetation to prevent public access. Details of planting between the two sites are not fully described however the areas to be managed and planted are shown in figure 11 of the ecological appraisal. Details, implementation and future management can be secured by condition.
48. It is understood that a program of wardening of the riverside footpath could be implemented by both camp site staff and Country Park rangers. This can be secured and implemented by a condition that requires detail on the level of wardening which will be undertaken, who will be responsible for carrying it out and ensuring it is implemented during the 'open season'. Additionally, signage and installation of woven willow fences to block off any potential river access points can also be secured by condition, along with provision of information to campsite visitors to encourage them to visit Lackford Lakes using the public entrance and discouraging them from entering by crossing the river.

Access and rights of way through the park

49. The site area of the proposed campsite now occupies the overflow car park and areas which are largely fenced from direct access by the parks visitors. The camp site is located in the least used part of the West Stow site and that has consequences on landscape character as described above. However policy DM42 promotes alternative recreational use of public open space where it is considered to be an enhancement or expansion of facilities.

50. The impact of the loss of the overflow car park during events has been raised as a concern. The potential impact is that parking on road verges might occur if parking is not properly managed. The applicant has confirmed that major events that require car parking do not coincide with the peak season of camping. There will therefore be availability of overflow car parking on the campsite during these events. The event dates are as follows:

- Easter Big Brecks Fest 27/28th March
- Dragon Fest 25/26th June
- Warrior Through Time 17/18th Sept
- Enchanted Heath 22/23rd October (potentially 28/29)

At the last Big Brecks Fest and Dragon Fest 3 parking attendants managed visitors. This allowed for proper parking of cars to the maximum potential which was approx. 250 within the existing car park. The overflow carpark was used on both days from about 11.45am - 3pm. This was not to the full amount (50) but around 30. This overflow number can easily be accommodated in the campsite area if needed.

51. The camping site is now located to the north of the long distance waymarked footpath known as 'St Edmunds Way'. This permissive path will remain available to the public and also to visitors of the camp site. The Country Park will remain open for campsite visitors after its closure to the general public. The main entrance to the Park will still be locked at 8pm. Due to the layout of the Park, campsite users having footfall access will be able to walk within the Park after 8pm. As there is no lighting in the Park, the darkness will act as a natural prohibiting factor in any movement of people after dark. Any lighting on the site will only be low level marker lighting around the buildings (details of which can be secured by condition). This is an important factor in the consideration of the impacts on the SPA as the assessment assumes that the Park provides alternative greenspace for visitors to use and therefore diverting visitors away from sensitive clear-fell areas.

Impact on highway safety

52. The Highways Authority has assessed the proposals and has raised no objections subject to conditions which are set out in the recommendation below. A suitable access is proposed, to the east of and separate from the Country Park access. A number of trees to the east along the road are proposed to be removed to ensure adequate visibility. The concerns of residents are noted, but there is not sufficient evidence to show that the proposed development would be harmful to highway safety. The proposals in this respect are considered acceptable.

Economic considerations

53. The Council's Economic Development team support the proposals. They

note that Tourism accounts for 10.5% of total employment (over 67,000 jobs) and is worth £1.3 billion to the Suffolk and Norfolk economy. It is one of the three key sectors identified as having the greatest potential for growth in the West Suffolk 'Six point plan for jobs and growth', which has an aim to encourage more overnight stays in West Suffolk.

54. There are clear economic benefits from the proposed scheme, which must be weighted accordingly in the balance of considerations. The additional visitors to the Country Park are likely to increase revenue to the existing visitor centre, café and to events held there. The application form states that an additional 2.5 full time equivalent posts would also be created from the development. This will lead plainly and on its own face to wider economic benefits from increased overnight visitors to the area and the associated additional spend. It will support the tourist industry in the area which is a very important part of the local economy in and around Bury St Edmunds.

Conclusion:

55. Given the ecological sensitivity of this site, any scheme for development must be carefully considered. As is detailed above, it is clear that the proposal to place a caravan and camping park within West Stow Country Park will have some harmful effects on landscape and biodiversity. These have been fully weighed against the benefits of the proposals and related planning policies. A Habitats Regulations Assessment (HRA) has been undertaken and has concluded that Likely Significant Effects can be screened out. With the conditions proposed, the principle and detail of the development is considered, on balance, to be acceptable and in compliance with relevant development plan policies and the National Planning Policy Framework.

Recommendation:

It is **RECOMMENDED** that planning permission be **Approved** subject to the following conditions:

1. The development hereby permitted shall be begun not later than 3 years from the date of this permission.

Reason: In accordance with Section 91 of the Town and Country Planning Act 1990.

2. The development hereby permitted shall not be carried out except in complete accordance with the details shown on the following approved plans and documents:

- Site location plan – 007 rev A
- Existing site plan – 008
- Proposed site plan – 012 rev J
- Proposed reception block – 010 rev A
- Proposed service block – 011 rev A
- Ecological Appraisal – August 2015
- Amendment to ecological appraisal – 8.12.2015

Design & Access Statement

Phase II Environmental Assessment Report – August 2014

Flood Risk Assessment – October 2015 (Rev A)

Reason: To define the scope and extent of this permission.

3. The new vehicular access shall be laid out and completed in all respects in accordance with Drawing No. 10399 012 J; and with an entrance width of 5.5 metres and made available for use prior to construction. Thereafter the access shall be retained in the specified form.

Reason: To ensure that the access is designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway safety.

4. Prior to the development hereby permitted being first occupied, the vehicular access onto the Icklingham Road shall be properly surfaced with a bound material for a minimum distance of 12 metres from the edge of the metalled carriageway, in accordance with details previously submitted to and approved in writing by the local planning authority.

Reason: To secure appropriate improvements to the vehicular access in the interests of highway safety.

5. The areas to be provided for storage of Refuse/Recycling bins as shown on drawing number 10399 012 J shall be provided in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.

Reason: To ensure that refuse recycling bins are not stored on the highway causing obstruction and dangers for other users.

6. Before the development is commenced details shall be submitted to and approved in writing by the Local Planning Authority showing the means to prevent the discharge of surface water from the development onto the highway. The approved scheme shall be carried out in its entirety before the access is first used and shall be retained thereafter in its approved form.

Reason: It is considered necessary to impose a pre-commencement condition so that any potential safety issues can be resolved prior to construction. This will ensure the prevention of hazards caused by flowing water or ice on the highway in the interests of road safety.

7. Gates shall be set back a minimum distance of 25 metres from the edge of the carriageway and shall open only into the site and not over any area of the highway.

Reason: In the interests of road safety.

8. All HGV traffic movements to and from the site over the duration of the construction period shall be subject to a Deliveries Management Plan which shall be submitted to the planning authority for approval a minimum of 28 days before any deliveries of materials commence.

No HGV movements shall be permitted to and from the site other than in accordance with the routes defined in the Plan.

The site operator shall maintain a register of complaints and record of actions taken to deal with such complaints at the site office as specified in the Plan throughout the period of occupation of the site.

Reason: To reduce and / or remove as far as is reasonably possible the effects of HGV traffic in sensitive areas.

9. The use shall not commence until the area(s) within the site shown on drawing number 10399 012 J for the purposes of [LOADING, UNLOADING,] manoeuvring and parking of vehicles has been provided and thereafter that area(s) shall be retained and used for no other purposes.

Reason: To ensure that sufficient space for the on site parking of vehicles is provided and maintained in order to ensure the provision of adequate on-site space for the parking and manoeuvring of vehicles where on-street parking and manoeuvring would be detrimental to highway safety to users of the highway.

10. Before the development is first occupied the vehicle turning space shown on the drawing number 10399 012 J shall be provided in its entirety and shall be retained thereafter in its approved form and used for no other purpose.

Reason: To enable vehicles to enter and exit the public highway in forward gear in the interests of highway safety

11. Before the access is first used visibility splays shall be provided as shown on Drawing No. 10399 012 J with an X dimension of 2.4 metres and a Y dimension of 215 metres and thereafter retained in the specified form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.

Reason: To ensure vehicles exiting the drive would have sufficient visibility to enter the public highway safely and vehicles on the public highway would have sufficient warning of a vehicle emerging in order to take avoiding action.

12. The existing access onto Icklingham Road at the eastern edge of the site as shown on Drawing No. 10399 012 J marked Emergency Access Only shall be used for no other purpose other than its current (pre-development) use and occasional emergency access.

Reason: The access is not suitable for any intensification of use due to the limited visibility onto Icklingham Road so any increased use would be detrimental to highway safety.

13. No development shall take place within the area indicated [the whole site] until the implementation of a programme of archaeological work has been secured, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority. The scheme of investigation shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording
- b. The programme for post investigation assessment
- c. Provision to be made for analysis of the site investigation and recording
- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation

e. Provision to be made for archive deposition of the analysis and records of the site investigation

f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.

g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

Reason: It is necessary to impose a pre-commencement condition as there is high potential for encountering further archaeological deposits at this location, which may be damaged by any groundworks associated with the present application and to enable any remains of archaeological significance to be investigated and recorded.

14. The site shall not be brought into use until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under Condition 13 and the provision made for analysis, publication and dissemination of results and archive deposition.

Reason: To enable any remains of archaeological significance to be investigated and recorded.

15. No development shall commence until a detailed surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydro geological context of the development, has been submitted to and approved in writing by the local planning authority.

Infiltration systems shall be used in the first instance unless poor soakage rates demonstrate otherwise and/or it is shown these SuDS features will pose a risk to groundwater quality. In this case the drainage strategy; DWG No. 012(H) and informatives in the accompanying FRA should be used instead.

The scheme shall be fully implemented and subsequently maintained, in accordance with the timing/phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed in writing by the local planning authority. The scheme shall also include details of how the scheme shall be incorporated through construction phases to completion and maintained and managed in perpetuity.

Reason: It is considered necessary to impose a pre-commencement condition to prevent the increased risk of flooding both on and off site, to improve and protect water quality and to ensure future maintenance of the system.

16. The touring caravan/tent pitches shall only be occupied between 1st March and 31st October in any year.

Reason: To ensure that the Local Planning Authority retains control of the site because it is located within the rural area where permanent residential occupation/permanent siting would not be permitted and to minimise disturbance to over wintering birds at Lackford Lakes SSSI to the south of the site.

17. No touring caravan/tent shall be stationed on the site for more than 28 consecutive days.

Reason: To ensure that the Local Planning Authority retains control of the site because it is located within the rural area where permanent residential occupation/permanent siting would not be permitted.

18. On commencement of the use hereby permitted, the owners/operators of the site shall keep at all times an up-to-date Register of all lettings which shall include the name and address of the person or party occupying the pitches during each individual letting. The Register shall be made available for inspection on demand by the Local Planning Authority.

Reason: To ensure that the Local Planning Authority retains control over the site.

19. Prior to their use on the site, details of the facing and roofing materials to be used shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: To ensure that the external appearance of the development is satisfactory.

20. Within two months of the commencement of development, there shall be submitted to and approved in writing by the Local Planning Authority a scheme of soft landscaping for the site drawn to a scale of not less than 1:200. The soft landscaping details shall include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants noting species, plant sizes and proposed numbers/ densities. The approved scheme of soft landscaping works shall be implemented not later than the first planting season following commencement of the development (or within such extended period as may first be agreed in writing with the Local Planning Authority). Any planting removed, dying or becoming seriously damaged or diseased within five years of planting shall be replaced within the first available planting season thereafter with planting of similar size and species unless the Local Planning Authority gives written consent for any variation.

Reason: To enhance the appearance of the development and help mitigate any impact on the wider landscape.

21. Within two months of the commencement of development full details of a hard landscaping scheme for the site has been submitted to and approved in writing by the Local Planning Authority. These details shall include proposed finished levels and contours showing earthworks and mounding; surfacing materials; means of enclosure; car parking layouts; other vehicle and pedestrian access and circulations areas and hard surfacing materials. The scheme shall be implemented prior to the occupation of any part of the development (or within such extended period as may first be agreed in writing with the Local Planning Authority).

Reason: To enhance the appearance of the development.

22. A landscape and ecological management plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority prior to the commencement of the development. The content of the LEMP shall include the following:

- a) Description and evaluation of features to be managed including all soft landscaping areas, planting between the campsite and Lackford Lakes SSSI, bund area to the northern and eastern boundary and campsite grassland areas
- b) Ecological trends and constraints on site that might influence management.
- c) Aims and objectives of management.
- d) Appropriate management options for achieving aims and objectives.
- e) Prescriptions for management actions.
- f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
- g) Details of the body or organization responsible for implementation of the plan.
- h) Ongoing monitoring and remedial measures.

The approved plan will be implemented in accordance with the approved details.

Reason: It is necessary to impose a pre-commencement condition to ensure suitable mitigation of any impacts of the proposals on existing protected species and to enhance the biodiversity of the site.

23. No development shall take place, including demolition, ground works and vegetation clearance, until a biodiversity monitoring strategy (in consultation with the Forestry Commission) has been submitted to, and approved in writing by, the local planning authority (in consultation with Natural England). The purpose of the strategy shall be to monitor visitor activity in clear-fell areas within 400m of the campsite and monitoring of nesting woodlark and nightjar to identify whether visitor numbers are having an adverse effect on the SPA qualifying birds.

The content of the Strategy shall include the following;

- a) Aims and objectives of monitoring to match the stated purpose.
- b) Identification of adequate baseline conditions prior to the start of development.
- c) Appropriate criteria, thresholds, triggers and targets against which the effects of visitor activity being monitored can be judged.
- d) Methods for data gathering and analysis.
- e) Location of monitoring.
- f) Timing and duration of monitoring.
- g) Responsible persons and lines of communication.
- h) Review of results and implementation of mitigation measures, and where appropriate, publication of results and outcomes including reporting to Natural England.

A report describing the results of monitoring shall be submitted to the local planning authority at intervals identified in the strategy. The report shall also set out (where the results from monitoring show that conservation aims and objectives are not being met) how contingencies and/or remedial action will be identified, agreed with natural England and the Local Planning Authority, and then implemented.

The monitoring strategy will be implemented in accordance with the approved details.

Reason: It is necessary to impose a pre-commencement condition to ensure a suitable biodiversity monitoring strategy can be secured to monitor the effects of visitor numbers on the SPA qualifying birds.

24. Prior to installation, details of all external lighting shall be submitted and agreed in writing with the Local Planning Authority. The lighting shall be installed in accordance with the approved details prior to the site being brought into use. No additional lighting shall be installed unless first agreed in writing with the Local Planning Authority. Any lighting must be directed away from site boundaries and adjacent clear-fell areas to avoid disturbance to foraging bats and SPA qualifying birds.
Reason: To ensure the effects of lighting on the site are minimised where it could have a detrimental impact on protected species.
25. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted a remediation strategy detailing how this unsuspected contamination shall be dealt with and obtained written approval from the Local Planning Authority. The remediation strategy shall be implemented as approved.
Reason: To protect and prevent the pollution of controlled waters from potential pollutants associated with current and previous land uses in line with National Planning Policy Framework (NPPF), paragraphs 109, 120, 121 and Environment Agency Groundwater Protection: Principles and Practice (GP3).
26. Piling or any other deep foundation designs and investigation boreholes using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.
Reason: To protect and prevent the pollution of controlled waters from potential pollutants associated with current and previous land uses in line with National Planning Policy Framework (NPPF), paragraphs 109, 120, 121 and Environment Agency Groundwater Protection: Principles and Practice (GP3).
27. Development shall not begin until a scheme for surface water disposal has been submitted to and approved in writing by the Local Planning Authority. Infiltration systems shall only be used where it can be demonstrated that they will not pose a risk to groundwater quality. The development shall be carried out in accordance with the approval details prior to the site being brought into use.
Reason: It is necessary to impose a pre-commencement condition as the site is located on the chalk principal aquifer (part of the Cam and Ely Ouse groundwater body, a Water Framework directive Drinking Water Protected Area). It is therefore necessary to protect and prevent the pollution of controlled waters from potential pollutants associated with current and previous land uses in line with National Planning Policy Framework (NPPF), paragraphs 109, 120, 121 and Environment Agency Groundwater Protection: Principles and Practice (GP3).
28. All ecological measures and/or works shall be carried out in accordance with the details contained in the Ecological Appraisal for West Stow dated 17 August 2015, including revisions and supplementary documents

submitted [Amendment to the Ecological Appraisal 8 December 2015] as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

Reason: To mitigate the impacts of the proposals on existing protected species and to enhance the biodiversity of the site.

29.No development shall take place, including demolition, ground works and vegetation clearance, until a mitigation strategy for reptiles as detailed in 4.2.67 of the Ecological Appraisal has been submitted to and approved in writing by the local planning authority. This shall include those areas described in the Ecological Appraisal and all camping areas where excavation and filling is required to make up levels. The reptile mitigation strategy shall be thereafter implemented, prior to the site being brought into use.

Reason: It is necessary to impose a pre-commencement condition to ensure a suitable mitigation strategy for reptiles can be secured.

30.No development shall take place until a scheme of wardening for the River Lark and Lackford Lakes boundary (in consultation with Suffolk Wildlife Trust) has been submitted to and approved in writing by the local planning authority.

The scheme shall include the following:

- a) Purpose and conservation objectives for the proposed wardening scheme.
- b) Extent and route of the proposed wardening scheme on appropriate scale maps/plans.
- c) Timetable for implementation demonstrating that works are aligned with the opening of the camping site.
- d) Persons responsible for implementing the works.
- e) Strategy for immediately dealing with campers found in the river
- f) Strategy for responding to complaints of trespass from Lackford Lakes (eg. immediate meeting with SWT to agree if mitigation is required)
- g) Details for potential remedial measures such as information to campers, signage and fencing.

The scheme of wardening shall be implemented in accordance with the approved details as soon as the site is brought into use.

Reason: It is necessary to impose a pre-commencement condition to ensure appropriate mitigation of any impacts of the proposals on existing protected species.

Documents:

All background documents including application forms, drawings and other supporting documentation relating to this application can be viewed online:

<https://planning.westsuffolk.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=NUTJIOPDKH000>