

Development Control Committee **8 July 2020**

Planning Application DC/20/0682/FUL – Caravan Site South, Pigeon Lane, Fornham All Saints

Date Registered:	23.04.2020	Expiry Date:	23.07.2020
Case Officer:	Britta Heidecke	Recommendation:	Approve Application
Parish:	Fornham All Saints	Ward:	The Fornhams And Great Barton
Proposal:	Planning Application - (i) Change of use of part of golf course for the siting of 35no. caravan holiday homes (ii) new access from A1101 (iii) construction of access roads, parking spaces and associated infrastructure (previous application DC/19/1700/FUL)		
Site:	Caravan Site South, Pigeon Lane, Fornham All Saints		
Applicant:	Mr David Harris		

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:

1. This application is a re-submission of an identical scheme previously recommended for approval but refused by committee on 05 February 2020. The application has now been submitted with the support of a visualisation, showing the expected views from Mildenhall Road, Pigeon Lane and from within the golf course when the proposed soft landscaping has reached maturity.
2. During the course of this application minor amendments have been made to the soft landscaping scheme to allow for the planned footpath widening along the A1101/ Mildenhall Road at the front of the application site.
3. The application site and large parts of the golf course fall within the parish of Fornham All Saints. The All Saints Hotel and parts of the golf course fall within the parish of Fornham St. Martin Cum St. Genevieve. Therefore, both Parish Councils have been consulted.
4. The application is before committee because Fornham All Saints Parish Council have no objections to the application and Fornham St. Martin Cum St. Genevieve Parish Council object. The ward member asked for the application to be considered by committee due to policy conflict and the adjoining Tollgate Ward Councillor objects to the proposal. 53 representations have been received, 40 objections from nearby properties and 13 support letters from customers of the existing hotel and golf course. The Officer recommendation is, on balance, one of approval.

Proposal:

5. The application seeks planning permission for the change of use of part of the golf course for the siting of 35 no. holiday lodges and associated new access off the A1101, access road and parking spaces and associated infrastructure including buggy park. In order to maintain the yardage of the golf course a total of 5 holes would also be altered.
6. The application also proposes a private foot/buggy path from the development site to the All Saints Hotel across the golf course and river Lark to provide a link from the proposed caravans to the hotel, also linking into the existing public rights of way.

Application Supporting Material:

7. The application is supported by the same documents as previously with the addition of a visualisation;
 - Application Form
 - Proposed Plans
 - Access Plan
 - Ecology Survey
 - Ecological Addendum
 - HRA report
 - Golf Course Alteration Report
 - Landscape Impact Assessment
 - Flood Risk Assessment
 - Drainage Strategy
 - Golf Course and Footpath Statement (risk mitigation)
 - Detailed Soft Landscaping Scheme
 - Planting Schedule and Specifications

- Visualisation

Site Details:

8. The application site comprises of 2.83 ha of approximately 50.6ha of golf course between Fornham All Saints and Bury St Edmunds. At present the application site is accessed only from within the golf course via a bridge over the river. The area proposed to change use is located between the Mildenhall Road Employment Area and Pigeon Lane/ Fornham All Saints, in the countryside in planning policy terms.
9. All Saints Hotel Golf Spa is located on the south side of the B1106 at Fornham All Saints, Bury St Edmunds, some 700 metres north of the application site. It currently provides for various leisure activities, golf, spa and has a hotel and restaurant. The site is bounded by the golf course to the north, the A1101 to the south, industrial development to the east and arable land to the west.
10. The site is outside any settlement boundary and located within the *valley meadowlands* landscape character typology as defined in the Suffolk Landscape character assessment and has many of the features typical of this landscape character type despite being used, in the main, as a golf course. It contains a large number of trees within the site, is bound by brambles and hedging along the western and southern boundary and a tree line off-site along the eastern boundary with the larger industrial buildings.
11. The conservation area for Fornham All Saints is located opposite Pigeon Lane in close proximity to the site.

Planning History:

12. There is extensive planning history associated with the golf club and hotel. Only the most relevant and recent applications are set out below:

Reference	Proposal	Status	Decision Date
DC/17/1351/FUL	Planning Application - Creation of access off Mildenhall Road into All Saints Golf and Country Club	Application Granted	26.01.2018
DC/18/1372/FUL	Planning Application - New bedroom wing to existing hotel to create 42 no. additional rooms	Application Granted	04.07.2019
DC/19/0347/FUL	Planning Application - (i) change of use of part of golf course for siting of 70no. caravan lodge holiday homes; (ii) new access from A1101 and B1106; (iii) construction of access roads; (iv) parking spaces and (v) associated infrastructure	Withdrawn	30.08.2019

DC/19/1700/FUL	Planning Application - (i) Change of use of part of golf course for the siting of 35no. caravan holiday homes (ii) new access from A1101 (iii) construction of access roads, parking spaces and associated infrastructure (as amended by email on 14.01.2019 to omit 2 caravans)	Application Refused	07.02.2020
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Consultations:

13. Fornham All Saints Parish Council: No objection subject to consultation responses being unchanged.
14. Fornham St. Martin Cum St. Genevieve: Object on grounds of Traffic increase, Sustainability, Effect on the environment, and Loss of Residential amenity.
15. Ward Councillor: Call in from war member Cllr Rebecca Hopfensperger due to policy conflict, seconded by Cllr Broughton. Cllr Hind (Tollgate member which adjoins the Fornhams) objects to the proposals on the grounds of Traffic, Noise, Sustainability, Effect on the environment, Archaeology and Loss of Residential amenity.

Environment & Transport – Highways Authority (HA):

16. Note that the scheme has not materially changed therefore do not object subject to conditions. HA previously commented the following:
17. The Highways Authority (HA) 'accepts that the traffic movements associated with this development will not have an impact on the peak traffic flows of Fornham Road A1101. However, we must caveat our response to state that this applies to the detail of this application only. No further development, intensification or use of this access for any other or additional purpose would be acceptable.'
18. The HA consider that the layout and access details show that a suitable pedestrian access into and through the development, and suitable parking and turning for all vehicles can be achieved. The HA also notes that in order to achieve visibility splays cutting back or removal of vegetation and removal or relocation of infrastructure such as street lighting and a road sign may be necessary. This will require separate consent from the HA. As the access details have been submitted in different documents the HA request a condition for holistic access details to be submitted.
19. The HA consider that building the proposed and permitted access DC/18/1354/FUL would have a severe impact on highway safety and state that support of this application is on the understanding that both accesses will not be built out.

20. The access overlay plan provided by the applicant on 28.10.2019 clearly demonstrates that the approved maintenance access and current proposed access could not both be implemented given they overlap. This is considered sufficient assurance in this case.
21. Suffolk Preservation Society: No comments received.
22. Conservation Officer: Notes that there are no material changes. No objection. Previous comments:
- 'This application is for 35 holiday lodges located on land at the southern end of the golf course associated with All Saints Hotel. It represents a reduced version of an earlier application.
- The site is close to the boundary of the Fornham All Saints Conservation Area and is separated from it by Pigeon Lane. The boundary of the proposed scheme would include a native hedge which would retain the natural character and appearance along Pigeon Lane, preserving the setting of the conservation area.
- I therefore have no objection to this application.'
23. Environment Agency: no comments received. Previously had no formal comment to make but offer standing advice on guidance for risks to controlled waters from contamination at the site.
24. Anglian Water Services Limited: Advise that Anglian Water has assets close to or crossing this site or there are assets subject to an adoption agreement. Therefore, the site layout should take this into account and accommodate those assets within either prospectively adoptable highways or public open space. If this is not practicable then the sewers will need to be diverted at the developers cost under Section 185 of the Water Industry Act 1991 or, in the case of apparatus under an adoption agreement, liaise with the owners of the apparatus. It should be noted that the diversion works should normally be completed before development can commence.
- Anglian Water confirms that foul drainage from this development is in the catchment of Fornham All Saints Water Recycling Centre that will have available capacity for these flows.
- The sewerage system at present has available capacity for these flows via a gravity connection to the public foul sewer.
- The preferred method of surface water disposal would be to a sustainable drainage system (SuDS) with connection to sewer seen as the last option. From the details submitted to support the planning application the proposed method of surface water management does not relate to Anglian Water operated assets.
25. Natural England: Notes that the site is within Impact Risk Zones for SSSI's designated for hibernating or breeding bats. It is suggested that the application submission should provide a proportionate set of evidence and conclusions regarding impacts on bats as notified features of the SSSI. The information should allow the LPA to assess whether (and to what extent) certain impacts exist and make an informed decision.

Ecology and Landscape Officer:

26. The Ecology and Landscape Officer considers that 'the level of tree removal is significant and would have a harmful effect. This vegetation which is also noted to have ecological value at a site level; irrespective of its species composition and condition makes an important contribution to the setting of Bury St Edmunds and the gap between the town and the village of Fornham All Saints'.
27. The Ecology and Landscape Officer notes 'that the proposed planting would take some time to mature and provide screening and softening to the lodges'.
28. The Ecology and Landscape Officer considers that 'the revised planting proposals show a good level of planting across the proposed site. The proposals aim to provide tree and shrub planting to the boundaries of the site, with some internal shrub planting and hedgerows. However, the effects of the new development on the boundary with Fornham Road, and Pigeon Lane has not been adequately addressed.'
29. The Ecology and Landscape Officer notes that 'an ecological report has been submitted for the site (Ecological Impact Assessment Report, Huckle Ecology Ltd, August 2019 18101R2v1). The area surveyed does not include the whole application site which has been extended to the east. Initial survey was undertaken in February 2019, with some additional surveys undertaken in spring 2019 in particular great crested newt presence/absence. The survey continues to conclude that further surveys for bats may be required if arboricultural works associated with the proposed development require the removal of mature oaks or poplars within the site (summary, bullet point 12 and final bullet point and section 6.19). The removal of the line of poplars is proposed and, additional survey work has not been undertaken to give a more accurate indication of the value of these trees in terms of foraging and roosting and the mitigation that would be required.
30. Japanese knotweed has been identified on the site (section 4.16). If planning permission is granted this would need to be dealt with by condition to prevent its spread.'
31. With regards to Habitats Regulations Assessment (HRA) the proposal is considered acceptable. The Ecology And Landscape Officer judges that provision of recreational open space associated with the lodges and improvements to access including connections to the existing PRow and safe circular walks through the golf course, and to the hotel would encourage the residents to remain within the locality rather than drive to the SPA.
32. Oil and Pipeline Agency: No objection.
33. Public Health and Housing: No comments or objections from a PHH perspective. The site would require a caravan licence for the operation. Risk from stray balls for the proposed development and footpaths have been raised by PHH. The management of the risks have been addressed in the Golf Course Alterations Report (by Swan Golf Course Designs - Golf course architects dated 25th September, received 08 Oct 2019). Risks to footpath

users have been addressed in the Golf Course Footpath Statement received 30th December 2019.

34.Environment Team: No objection subject to conditions to secure intrusive contamination investigation and to ensure provision of electric vehicle charge points.

35.Suffolk Wildlife Trust: No comments received.

36.Leisure & Cultural Operational Manager: No comments received.

37.SCC Flood and Water Team: No objection subject to conditions.

38.National Grid Plant Protection: No comments received.

39.Sport England: No comments received.

40.Historic England: Do not wish to comment.

41.Rights Of Way Support Officer SCC: No objections.

42.Ramblers Association: No comments received.

Representations:

43.Representations have been received from 53 households, 40 objections from nearby properties and 13 support letters from customers of the existing hotel and golf course.

44.The objections raise concerns with regards to:

- Residential Amenity – noise from holiday makers and vehicles, potential smell and pollution
- Visual amenity – lodges out of character with the area
- wildlife / loss of habitat
- loss of trees
- continued functioning of the golf course
- Undermines gap between Bury St Edmunds and Fornham All Saints
- Traffic on A1101 has already increased significantly from Marham Park
- precedent for future planning applications
- traffic and highway safety
- Adverse impact on nocturnal character
- Flooding and drainage
- No play area
- Health and safety from stray balls
- Lack of demand
- Poorly maintained and inaccessible footpaths
- Heritage and archaeological remains
- Air and noise pollution from traffic
- Proposal will jeopardise the delivery of allocated site RV6
- Unrelated to hotel/Spa and golf course
- In-combination effects with other approved and planned development
- Lack of information/ landscaping
- How will these be occupied / holiday use controlled

45. Support comments make the following summarised points:

- Employment
- Additional and more choice of tourism accommodation
- Help diversify golf course/ make it more viable
- More footfall for local business
- Site is next to the industrial area and far away from any residential

Policy:

46. On 1 April 2019 Forest Heath District Council and St Edmundsbury Borough Council were replaced by a single Authority, West Suffolk Council. The development plans for the previous local planning authorities were carried forward to the new Council by Regulation. The Development Plans remain in place for the new West Suffolk Council and, with the exception of the Joint Development Management Policies document (which had been adopted by both Councils), set out policies for defined geographical areas within the new authority. It is therefore necessary to determine this application with reference to policies set out in the plans produced by the now dissolved St Edmundsbury Borough Council.

47. The following policies of the Joint Development Management Policies Document and the St Edmundsbury Core Strategy 2010 & Vision 2031 have been taken into account in the consideration of this application:

- Core Strategy Policy CS1 - St Edmundsbury Spatial Strategy
- Core Strategy Policy CS4 - Settlement Hierarchy and Identity
- Core Strategy Policy CS9 - Employment and the Local Economy
- Core Strategy Policy CS13 - Rural Areas
- Vision Policy RV1 - Presumption in favour of Sustainable Development
- Policy DM1 Presumption in Favour of Sustainable Development
- Policy DM2 Creating Places Development Principles and Local Distinctiveness
- Policy DM5 Development in the Countryside
- Policy DM7 Sustainable Design and Construction
- Policy DM10 Impact of Development on Sites of Biodiversity and Geodiversity Importance
- Policy DM11 Protected Species
- Policy DM12 Mitigation, Enhancement, Management and Monitoring of Biodiversity
- Policy DM13 Landscape Features

- Policy DM14 Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards
- Policy DM20 Archaeology
- Policy DM34 Tourism Development
- Policy DM42 Open Space, Sport and Recreation Facilities
- Policy DM44 Rights of Way
- Policy DM46 Parking Standards

Other Planning Policy:

48. The National Planning Policy Framework (2019) was revised in February 2019 and is a material consideration in decision making from the day of its publication. Paragraph 213 is clear however, that existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of the revised NPPF. Due weight should be given to them according to their degree of consistency with the Framework; the closer the policies in the plan to the policies in the Framework; the greater weight that may be given. The policies set out within the Joint Development Management Policies have been assessed in detail and are considered sufficiently aligned with the provision of the 2019 NPPF that full weight can be attached to them in the decision making process.

Officer Comment:

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

- Principle of Development
- Impact on the character, appearance and amenity of the area;
 - A1101 views
 - View from Pigeon Lane
 - Views from The Lark Way footpath
 - Conclusion Landscape Impact
- Highways considerations
- Impacts on Nature Conservation and Biodiversity/ HRA assessment
- Whether the scale is appropriate for the context and Need
- Heritage Assets and Archaeology
- Residential Amenity
- Risk from stray balls
- Flood risk/ Drainage/ Pollution
- Contamination
- Air Quality
- Planning Balance

Principle

50. An application for an identical scheme for 35 caravans was considered by committee in February 2020. The previous recommendation for approval was overturned and refused by committee for the following reason:

'Paragraph 127 of the National Planning Policy Framework (NPPF) requires developments to be sympathetic to local character and history, including the

surrounding built environment and landscape setting. Paragraph 170 of the NPPF seeks decisions to contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).

Policy DM2 d. of the West Suffolk Joint Development Management Policies Document (JDMPD) 2015 seeks to protect important open, green or landscaped areas which make a significant contribution to the character and appearance of a settlement.

Policy DM13 states that development will be permitted, taking mitigation measures into account, where it will not have an unacceptable adverse impact on the character of the landscape, landscape features, wildlife, or amenity value. It also requires all development proposals to demonstrate that their location, scale, design and materials will protect, and where possible enhance the character of the landscape, including the setting of settlements, the significance of gaps between them and the nocturnal character of the landscape.

Policy DM34 of the West Suffolk Joint Development Management Policies Document (DMPD) 2015 permits new tourism facilities including caravans if they meet certain criteria including; (b) that there would not be an adverse effect on the character, appearance or amenities of the area and the design is of an acceptable standard.

The Bury St Edmunds Core Strategy 2010, policy CS4 states that the coalescence of towns with surrounding settlements through new development will not be allowed to happen. This vision is also set out in the Bury St Edmunds Vision 2031, which at paragraph 1.39 states 'Existing surrounding settlements will be protected from coalescence and have green buffer zones developed between them and Bury St Edmunds to maintain their integrity.

Moreover Objective 4 of the Rural Vision 2031 seeks (inter alia) to ensure that any new development does not compromise the natural and built up character, identity and local distinctiveness of the rural area.

The application site is designated as countryside and recreational open space in the St Edmundsbury policies map (February 2015). The site is part of the Fornham All Saints golf course and makes an important contribution to the setting of Bury St Edmunds and the gap between the town and the village of Fornham All Saints. The proposal would introduce built development and urbanising features thereby extending the urban edge which would further reduce the gap between settlements, contrary to policy DM13.

The level of tree removal is significant and would have a harmful effect on the visual amenity of the area. The proposed development would be intrusive within views from Mildenhall Road and Pigeon Lane and detract from the existing rural setting. The proposals, particularly in the short term, represent a deterioration in landscape character of the recreational open space.

Whilst the adverse effects on visual amenity would diminish as the planting proposals mature, this is not considered to overcome the harmful effects the introduction of development on this part of currently undeveloped open countryside would have by reason of coalescence between the settlements.

For the reasons set out above the proposal is considered to be contrary to policies DM2, DM13 and DM34 of the JDMPD, Policy CS4 of the Core Strategy 2010, Objective 4 of the Bury St Edmunds Vision 2031 and the guiding principles of the NPPF, notably paragraph 127 and 170.

The proposal would provide economic and social benefits from the construction and operation of the caravans and some modest additional employment, however the harm identified above is considered to significantly and demonstrably outweigh the benefits of the scheme.'

51. This re-submission is not materially different but has been submitted with additional information in the form of a visualisation.
52. The application site is designated as countryside under the current policies map (September 2014), where policy DM5 applies.
53. Policy DM5 states that the countryside will be protected from unsustainable development and sets out in what circumstances development might be acceptable. Under criteria d) (inter alia) new tourism facilities will be permitted in accordance with other policies in the plan.
54. The last paragraph of DM5 states 'Proposals for economic growth and expansion of all types of business and enterprise that recognises the intrinsic character and beauty of the countryside will be permitted where:
 - it will not result in the irreversible loss of best and most versatile agricultural land (grades 1, 2 and 3a);
 - there will be no significant detrimental impact on the historic environment, character and visual amenity of the landscape or nature conservation and biodiversity interests; and
 - there will be no significant adverse impact on the local highway network.'
55. Policy DM13 - Landscape Features permits development where it will not have an unacceptable adverse impact on the character of the landscape, landscape features, wildlife or amenity value. Individual proposals will be assessed based on their specific landscape and visual impact.
56. The policy most relevant for the consideration of this proposal is Policy DM34 – Tourism Development. This seeks to direct larger scale tourism activities and overnight accommodation to the larger urban areas. The policy permits new tourism facilities, including overnight visitor accommodation such as holiday lodges, static and touring caravans provided that a number of criteria are being satisfied. The policy requires proposals to:
 - a) be connected to and associated with existing facilities or located at a site that relates well to the main urban areas and defined settlements in the area and can be made readily accessible to adequate public transport, cycling and walking links for the benefit of non-car users;

- b) not adversely affect the character, appearance or amenities of the area and the design is of a standard acceptable to the Local Planning Authority;
- c) vehicle access and on-site vehicle parking would be provided to an appropriate standard.

Additional criteria apply to rural areas, where proposals must also:

- d) have no significant adverse impact on nature conservation, biodiversity or geodiversity interests, or upon the character or appearance of the landscape and countryside;
- e) be of an appropriate scale for their context and/or comprise the conversion of suitable existing rural buildings or limited extension to existing visitor accommodation.

57. Also relevant is Policy DM42 - Open Space, Sport and Recreation Facilities seeks to resist development which will result in the loss of existing amenity, sport or recreation open space or facilities. The NPPF para 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

58. The application site forms part of the Fornham All Saints golf course and hotel and spa complex, which is designated as recreational open space and countryside in planning policy terms. The site is located in the southern corner of the golf course and abuts the Mildenhall Road Employment Area to the south-east. The site is some 2km north of Bury train station and just over 3km from the town centre of Bury St Edmunds. The application has been submitted with a golf course re-design scheme to demonstrate that the functionality of the 18 hole golf course will not be affected.

59. The proposal therefore would not result in the loss of existing amenity and sports facilities. Sports England has raised no objections. The proposed lodges would be connected to and associated with the existing All Saints Hotel, Golf and Spa; the lodges would have functional links and be linked by an internal footpath and buggy path. Whilst connected with existing facilities the proposal is also considered to relate well to the main urban area and defined settlement in the area as required by policy DM34 criteria a and e. Moreover, the application has demonstrated that there is good access to public transport, cycling and walking links for the benefit of non-car users.

60. As such the proposal does not conflict with policy DM42 and meets the criteria set out in para 97 of the NPPF. For the foregoing reasons, the proposal is also considered to comply with policy DM5 and DM34 a) and d) and as such is acceptable in principle subject to compliance with criteria b) to d) of policy DM34 and other relevant policies in the development plan. This will be explored further below.

Whether the proposal would adversely affect the character, appearance or amenities of the area and the design is of an acceptable standard

61. The application was submitted with an Arboricultural Impact assessment which shows the trees to be removed to enable the development, for arboricultural reasons and the trees to be retained on site. The proposal will result in the removal of a significant number of category B and C trees, including a row of Lombardi Poplars, assessed as being of high amenity value. However, the trees are not protected and poplar trees are generally relatively short lived and as such would not warrant protection through the serving of a TPO. Some other trees have been identified as requiring work or felling regardless of the proposal. Several diseased trees have been felled in recent weeks. The row of mature poplar trees along the boundary with the industrial units would be retained.
62. A Landscape and Visual Impact Assessment (LVIA) has been provided by the applicant in accordance with the requirements of policy DM13. The LVIA notes that the application site and the rest of the golf course are situated within the River Lark valley floor but exhibit very few of the characteristics identified within the existing landscape character assessments. The LVIA notes that there are poplars present in the landscape, although their linear nature is formal in character and an incongruous addition to the landscape.
63. Views of the application site were found to be localised to receptors adjacent to or close to the site. Wider views are limited due to buildings, bunds or vegetation forming an effective screen. Receptors for near distance views are the A1101 Mildenhall Road, Pigeon Lane and views from The Lark Way footpath. No middle or long distance views have been identified.
64. The application site forms the edge of the built up area on the eastern side of the A1101 and opens up to the golf course beyond, east of Pigeon Lane. On the other side of the A1101 the industrial park continues past the entrance to Pigeon Lane and beyond the application site, albeit behind a wide grass verge and tree screen. The edge of Marham Park, major residential development under construction, is then visible, creating an urban character.
65. An arable field, which also marks the edge of the conservation area, bounds the site west of Pigeon Lane. Pigeon Lane is a road used by vehicular traffic in Fornham All Saints north of the application site but is a pedestrian and cycle path for some 130m north and along the application site until it meets the A1101. A bund, boundary shrubs and brambles line Pigeon Lane, providing a verdant feel. As the footpath approaches Mildenhall Road, the bund and planting on the golf course side falls away and views into the golf course become available with a chain-link fence bordering the site. At this point the presence of the road and the industrial park beyond are also seen and have an urbanising effect on the view.

A1101 views

66. The LVIA states that it was anticipated that the lodges and associated car parking would be glimpsed in views from the road, especially at the entrance, but their dominance in the views would be limited due to their scale and appearance in comparison to the industrial units. It was accepted that there will be some new urbanising features introduced to the application

site, but this is not considered incongruous, or out-of-character, in these views along the road. It is therefore concluded that although there would be a change, the impact within the view would be negligible.

67. The proposal includes a comprehensive soft landscaping scheme. In response to comments from Officers the previous scheme was amended from 37 cravens to 35, to reduce the overall number of caravan plots and increase the planting buffers along Pigeon Lane. The scheme includes a native hedge, made up of 10% evergreen English Holly, and tree planting along the proposed access and within the site, opposite the access drive, to reduce glimpses and the visual impact from the lodges in views from the A1101.
68. The soft landscaping scheme would extend the grass verge along the roadside, beyond which there would be a boundary hedgerow. The trees along the frontage with Mildenhall road have been moved away from the edge of the highway to facilitate planned widening of the footpath along Mildenhall Road, as advised by the HA.
69. The LVIA concluded the character of the site and its surroundings would not be significantly diminished and with positive landscaping there would be the opportunity for improvements, also in terms of arboricultural and ecological additions.

View from Pigeon Lane

70. The view into the golf course currently consists of a manmade landscape with mown grass and scattered trees and shrubs. Some trees identified in the Hayden's tree survey with decay and posing a danger have already been removed.
71. A bund runs along the side boundary with Pigeon lane. The lodges and associated car parking would become more visible in views from Pigeon Lane where the bund drops. The planting up to this point is proposed to be enhanced and at this point new boundary planting is proposed to continue the screen up to the road. The lodges are also proposed to be clad in natural timber and so this would further mitigate their impacts within this view.

Views from The Lark Way footpath

72. The Lark Valley footpath runs across the golf course alongside the river. The LVIA notes that along this part of the footpath the main views are of the golf course environment with the river in the foreground and in the distance the backs of properties from the neighbouring villages and filtered glimpses of the traffic on the road and of the industrial park. Built form is therefore already present in these views.
73. The proposed lodges 'would be visible in the background, although their timber cladding would help them to blend into the planted backdrop. The north-northeast boundary of the application site would then be partially planted to soften the appearance of the lodges in these views. These groups and single trees would fit with the golf course environment and create a natural undulating edge'.

74. The visual impacts will in time be reduced by the mitigation planting and cannot be considered to adversely affect the character of the PROW as a whole, either once planting has established or even at the outset immediately following planting, and thus the proposal would not be contrary to policy DM44 - Rights of Way.

Conclusion on Landscape Impact

75. The applicant's tree consultant has advised that the visualisation now submitted in support of the application indicates the *'projected visual effects of the planting as it becomes well established, which is normally defined as 15 years. Clearly growth rates vary between species and will also be affected by growing conditions. Most of the proposed planting is native and so it is anticipated that these species should grow fairly quickly and the level of screening shown could be achieved within a period of 5-10 years. It is also possible to plant the trees and shrubs at bigger stock sizes which would also provide more instant impact, although smaller plants tend to 'catch up' quite quickly.'*

76. The Ecology and Landscape Officer noted the level of tree removal is significant and would have a harmful effect. Whilst the trees are not protected the sites makes an important contribution to the setting of Bury St Edmunds and the gap between the town and the village of Fornham All Saints.

77. The LVIA sets out landscape features within and surrounding the site to be retained, enhanced and extended. These include the introduction of rough meadow grassland, parkland trees within the golf course, along the A1101 and significant numbers of trees at the entrance to the site, linear native boundary scrub planting along all of the boundaries and within the caravan park.

78. The Ecology and Landscape Officer considered that the revised planting proposals show a good level of planting across the proposed site. The proposals aim to provide tree and shrub planting to the boundaries of the site, with some internal shrub planting and hedgerows. Concerns remain about the effects of the new development on the boundary with Pigeon Lane.

79. The Landscape and Ecology Officer highlights in her comments that policy DM13 requires all development proposals to demonstrate that their location, scale, design and materials will protect, and where possible enhance the character of the landscape, including the setting of settlements, the significance of gaps between them and the nocturnal character of the landscape.

80. The policy goes on to state that where any harm will not significantly and demonstrably outweigh the benefit of the proposal, development will be permitted subject to other planning considerations. And, it is essential that commensurate provision must be made for landscape mitigation and compensation measures, so that harm to the locally distinctive character is minimised and there is no net loss of characteristic features.

81. Whilst the proposal in this edge of settlement location would bring about some change in the landscape, the site is fairly well contained and includes a substantial soft landscaping scheme to mitigate and compensate for any

tree loss and visual impacts. The undeveloped gap between Pigeon Lane residential development and the edge of Bury St Edmunds would be reduced. However, given the type of development with the caravans clad in timber and set within hedged boundaries and soft landscaping, a verdant rural character would be retained. Due to the shape and location of the application site, the existing bund and vegetation in place and proposed, the development is not considered to unduly encroach into open countryside. Moreover, the scheme has been amended to omit 2 lodges on the northern edge of the proposed development to slightly increase the gap and allow for a larger green buffer.

82. With regards to the nocturnal character the Inspector for a similar proposal on a nearby site (Fornham Park Lodge development / Phase 2 - Appeal Decision APP/E3525/W/17/3185630) found that 'Whilst any increase in human activity is likely to affect the level of darkness at night, the nearby main roads and industrial installations already compromise the nocturnal environment. Providing the level of external lighting is restricted, the additional lodges would not significantly add to existing levels of artificial light'. In this case the road and industrial units are similarly close to the application site, compromising the nocturnal environment. A condition is therefore recommended for a detailed lighting scheme to be submitted for approval by the LPA prior to its installation.

83. Officers acknowledge that the soft landscaping proposals will take time to establish and mature, however over time the visual impacts from the development will reduce and be limited. The proposal, subject to the implementation of the soft landscaping scheme, is not considered to be unacceptably harmful to the character of the area considering also that the trees to be removed are not protected.

84. The amended proposal is considered to minimise the harm to the locality and distinctive character of the area. There is no net loss of characteristic features as required by policy DM13. On balance therefore the proposals are not considered so harmful to the visual amenities of the area to justify refusal for this reason.

Highways considerations

85. Concerns have been raised by the Parish Council and local residents about the increase in traffic cumulatively with other development in the area and the safety of the proposed new access. The concerns are noted and SCC Highways has been consulted on the proposals.

86. An access for maintenance vehicles off the A1101 to this side of the golf course was granted permission in 2018. This access was sub-standard and only suitable for infrequent use. This access has not been implemented. The present application proposes a new access to current highways standards in terms of width, construction and visibility. The site layout shows on-site parking for the individual caravans in accordance with the current standards.

87. The NPPF states at para 111 that 'All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be

assessed.' What constitutes a 'significant amount of movement' is a matter of planning judgement.

88. Policy DM45 requires major development and/or where a proposal is likely to have significant transport implications to provide a transport assessment appropriate to the scale of development and the likely extent of transport implications. The policy refers to the Indicative thresholds for application of transport assessments/transport statements contained at Appendix B, Department for Transport Guidance March 2007, Guidance on Transport Assessment. This sets out when a Transport Statement (TS) or Transport Assessments (TA) and Travel Plans (TP) are required. For C1 Hotels it states that no assessment is required for less than 75 bedrooms, a TS for between 75 and 100 bedrooms and a TA/TP for over 100 bedrooms.
89. The proposal is for 35 holiday caravans. On the basis of the above, in the view of officers the proposal cannot reasonably be argued to have significant transport implications such that it requires a full Transport Statement.
90. However, a statement with trip number estimates based on similar developments has been submitted with the application which shows low peak hour trip generation.
91. The NPPF at para 109 advises that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
92. Given the number of units below indicative thresholds and the likely low peak hour trip generation the proposal is not considered to have severe impacts on the road network alone or cumulatively with other development. SCC Highways has no objection to the amended proposals subject to conditions, including one to ensure that the previously approved maintenance access could not be constructed as well as the proposed access.

Nature conservation, biodiversity or geodiversity interests and impact upon the character or appearance of the landscape and countryside

93. The LPA, as a public authority in England, has a duty under the Natural Environment and Rural Communities (NERC) Act 2006 s.40, to have regard to conserving biodiversity in decision making.
94. The Framework confirms the planning system should contribute to and enhance the natural environment by, inter alia, minimising impacts on biodiversity and providing net gains where possible. The Framework states that protection of designated sites should be commensurate with the status of the site, recognising the hierarchy of international, national and local designations.
95. Development Management Policy DM10 requires the local planning authority to have regard to expert nature conservation advice. It sets out detailed criteria for the consideration of the impact of development on sites of biodiversity importance.

96. Natural England notes that the site is within Impact Risk Zones for SSSI's designated for hibernating or breeding bats. The information submitted should allow the LPA to assess whether (and to what extent) certain impacts exist.
- (i). Changes to bat roosting features at the SSSI
 - (ii). Changes to commuting flight paths and foraging habitats within the ZOI
 - (iii). Changes to vegetation cover within the SSSI boundary, or nearby
 - (iv). Changes to levels of access
 - (vi). Changes to noise levels
97. The application has been submitted with an Ecological Impact Assessment Report (EIA), Huckle Ecology Ltd, August 2019 18101R2v1. Initial surveys were undertaken in February 2019.
98. Para 3.22 of the EIA notes that 'While the SBIS (Suffolk Biodiversity Information Service) data search provided records of barn owl, bats and water vole, all records were sufficiently distant to suggest that there is no connection between the location of the record and the Site itself.'
99. Para 613 of the EIA notes that 'No evidence of bat activity was recorded during the extended Phase I habitat survey, but both foraging and potential roost habitat were identified. Bats were observed foraging and commuting during the nocturnal amphibian surveys; bats identified using a Wildlife Acoustics EMTouch full spectrum bat detector identified Daubenton's bats (*Myotis daubentonii*) foraging regularly over the ponds, and Common pipistrelle and sSoprano pipistrelle in other areas of the golf course. The golf course itself supports water bodies and lines of trees that provide suitable foraging habitats for bats.'
100. Some additional surveys were undertaken in spring 2019 in particular with regards to great crested newt presence/absence, which confirmed absence of great crested newts.
101. The EIA concluded that Further surveys for bats may be required if arboricultural works associated with the proposed development require the removal of mature oaks or poplars within the Site. The Councils Ecology Officer notes that removal of the line of poplars is proposed (G001 of the tree survey). Subsequently an ecological addendum report including the findings of a 'Bat Ground-Level Roost Assessment of Trees to be Removed' was submitted in January 2020.
102. The addendum clarified concerns raised by the Councils Ecology Officer in relation to whether the whole application site was surveyed. A map and para 2.1 of the addendum confirm that 'The whole of the application site has been subject to an appropriate level of ecological survey. Including a phase1 habitat survey as reported in the EIA report included. Whilst the Phase1 Habitat Survey Map included within the previous EIA report covered a slightly smaller area that related to a previous site design, the area of the golf course surveyed included the whole application site and adjacent areas of the golf course as appropriate'.
103. The addendum notes that in line with the Bat Conservation Trust's Bat Surveys for Professional Ecologist, Good Practice Guidelines (Collins, 2016) a ground level roost assessment was undertaken of the trees

scheduled for removal to provide clarification regarding the requirements for, and scope of, further detailed inspection that would potentially be required.

104. The tree survey undertaken in 2019 by Haydens Arboricultural Consultants identified several trees with disease or decay presenting a significant risk to users of the golf course and recommended felling for health and safety reasons. At the time of the ground level assessment on 13th January, it was noted that several diseased trees had been felled in recent weeks.
105. The lines of Lombardi Poplar to be removed are identified as Group G001 in the tree report and comprised 23 individual trees. All trees lacked Potential Roosting Features (PRFs) and were assessed as being of negligible potential to support bat roosts. Consequently, the report concludes that no further surveys such as PRF climbing inspections are required.
106. The addendum notes that Group G003 comprised a total of 7 poplar trees located along the southeast boundary of the site between the site and the adjacent industrial estate. The trees are to be retained. No PRFs were identified in any of the trees. Two trees were assessed as being of negligible to low potential because of ivy and scarred bark in the crown. However, as these trees are to be retained the addendum report concluded that no further surveys are considered necessary.
107. All other trees present within the site were inspected and assessed as providing negligible bat roosting potential.
108. Consequently, the report concludes that it is reasonably likely that the risk of bat roosts being present is negligible. Therefore, it is concluded that no further survey would be required prior to removal of the Lombardy poplar trees scheduled for felling.
109. Because the tree line provides a linear feature that may be used by foraging bats, the EIA report sets out mitigation and enhancement measures including filling in gaps along the linear boundary along the western site boundary, the implementation of a sensitive lighting strategy and the erection of two groups of three bat boxes (6 in total) in trees adjacent to the proposed development.
110. The addendum (para 3.22) considers that *'the mitigation measures detailed within the EcIA report (Huckle Ecology, 2019) combined with the landscape planting specified for the revised scheme are considered to provide appropriate mitigation measures for any potential adverse effects associated with the proposed development and would also provide enhancements to biodiversity across the development site.'*
111. The Councils Ecology and Landscape Officer has reviewed the addendum report which covers the additional part of the site and the further survey of poplars required and recommends that should the application be given permission the bat boxes proposed should be conditioned.
112. On the basis of the above, and subject to conditions to secure the implementation of the soft landscaping, biodiversity enhancement measures and the submission of a suitable lighting strategy, the proposal is not

considered to adversely impact on roosting or foraging bats or other protected species, in accordance with policy DM11 and DM12.

HRA assessment

113. The LPA, as the competent authority, is responsible for the Habitats Regulation Assessment (HRA) as required by The Conservation of Habitats and Species Regulations 2017(as amended). Regulation 63 (1) requires that a competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which (a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and (b) is not directly connected with or necessary to the management of that site, must make an appropriate assessment of the implications of the plan or project for that site in view of that site's conservation objectives.
114. The site is located approximately 5km from the closest component of Breckland Special Protection Area (also designated as Breckland Forest SSSI). Whilst no direct effects have been identified, there is potential for indirect effects as the additional visitors to the site will, in combination with other developments, contribute to recreational pressure in the Breckland SPA.
115. The Ecology And Landscape Officer judged that provision of recreational open space associated with the lodges and improvements to access including connections to the existing PRow and safe circular walks through the golf course, and to the hotel would encourage the residents to remain within the locality rather than drive to the SPA. The proposal, subject to a condition to ensure the measures set out in the HRA report are implemented prior to occupation, is considered acceptable with regards to its impacts on the Breckland SPA.

Whether the proposal would be of an appropriate scale for their context

116. Para 83 of the NPPF supports the diversification of land-based rural businesses and sustainable rural tourism and leisure developments which respect the character of the countryside.
117. Policy DM34 criterion e) requires proposals for new tourism accommodation in the countryside to be of an appropriate scale for their context and/or comprise the conversion of suitable existing rural buildings or limited extension to existing visitor accommodation.
118. The policy advises that 'the larger urban areas will be the focus for larger scale tourism activities and overnight accommodation in accordance with the requirement to concentrate development at the most sustainable locations'. 'Larger scale' is undefined. However, the development is within walking and cycling distance of Bury St Edmunds.
119. Concerns have been raised about the lack of need for additional lodges in the area and the viability of the site allocated in the Rural Vision 2031 policy RV6. This has also been considered by the Inspector for Fornham Park Phase 2 development. St. Genevieve Lakes at Park Farm, Ingham was the subject of a 2017 masterplan. The proposals involve the ongoing restoration of the landscape to form lakes with up to 100 units of

holiday accommodation with other attractions. The masterplan indicates different type of lodges to those at Fornham Park or to the caravans proposed under this application, with an emphasis on glazing and extensive views across the lakes, which would be very different.

120. No evidence has been provided to show that the viability of St Genevieve Lakes, which is entering the initial stages of planning approval, would be threatened by either the appeal scheme for Fornham Park Phase 2, or the proposed caravans here. The Inspector found it is reasonable to assume that the anticipated attractions and facilities such as fishing at St Genevieve are likely to be supported by visitors to additional lodges.
121. For the reasons outlined above the proposals are, on balance, considered acceptable when assessed against policy DM34 and all other relevant JDMPD policies and would not conflict with the strategic aims for rural areas of Core Strategy policy CS13.

Heritage Assets and Archaeology

122. The Planning (Listed Buildings and Conservation Areas) Act 1990 (under Section 66) requires the decision maker to have special regard to the desirability of preserving or enhancing a listed building or its setting or any features of special architectural or historic interest which it possesses. Section 72 (1) of the same Act requires the decision maker to have special regard to the desirability of preserving or enhancing the character or appearance of a conservation area.
123. The site is not in proximity to any listed buildings but the Fornham All Saints conservation area runs along the western side boundary with Pigeon Lane. The Scheduled Ancient Monument 'Sites NW and SE of Fornham All Saints' associated with the Fornham St Genevieve battle (1173) lies some 200m to the North-West of the application site.
124. Historic England confirmed previously that a site visit has established, that although the proposed development does occupy the one remaining area of open space in the vicinity of the monument, views from the monument are limited by the existing development along Pigeon Lane and by the hedgerows on either side of the lane. They raised no objection but note that it is probable that archaeological remains relating to the wider prehistoric ritual landscape will be disturbed or damaged and archaeological advice should be sought.
125. The Battlefield Trust suggested that battle related artefacts might be present on site of the Fornham St Genevieve battle (1173). The Battlefields Trust judges it would be appropriate to undertake a pre-development investigation.
126. SCC Archaeology noted that the proposed development is in a sensitive archaeological location, close to the end of the Scheduled Fornham Cursus Complex, and in a topographic location that has a high potential for Anglo-Saxon remains to be encountered.
127. The applicant has provided an 'archaeological pre-determination evaluation' including information on the proposed ground disturbance caused by services and no dig block paving and road surface construction.

Given the limited ground disturbance and that one third of the application area nearest the cursus was a gravel extraction pit in the early part of the 20th century, SCC Archaeology believe that the archaeology works can be carried out post determination. On this basis standard conditions should be attached to ensure compliance with policy DM20.

128. The Conservation Officer had assessed the proposals and concluded that the proposed scheme including a native hedge boundary, would retain the natural character and appearance along Pigeon Lane, preserving the setting of the conservation area. As such the proposal would not conflict with policy DM17, which seeks to preserve or enhance views in and out of the conservation area.

Residential Amenity

129. Concerns have been raised by local residents about potential adverse effects on the amenities of existing nearby residents by reason of noise from holiday makers and vehicles, potential smell and pollution.
130. Policy DM2 and guidance within the NPPF seeks to ensure, taking mitigation measures into account, that new development does not adversely affect the amenities of adjacent areas and/ or residential amenity.
131. In this case, the application site is well over 200m away from the nearest residential properties in Pigeon Lane and over 100m and separated by the busy A1101 from new residential development at Marham Park. The separation is such that it is not considered likely that the proposal would have unacceptable impacts on neighbour amenity by reason of noise from users or vehicles associated with the proposal. Anglian Water has confirmed that there is available capacity for foul drainage and the sewerage system at present has available capacity to connect to the public foul sewer. The details would be subject to building regulations and details for adequate refuse and recycling bins can be secured by condition. As such there is considered to be sufficient control to ensure that there no unacceptable impacts on residential amenity, in accordance with policy DM2.

Risk from stray golf balls

132. The proposal will require the redesign of the 14th and 15th holes to accommodate the proposed development. The report by Swan Golf Designs was appointed with the redesign to ensure there is no significant loss in quality of golf, and that all reasonable steps are taken to prevent golf balls from landing within the area of the proposed development.
133. A significant proportion of the application site forms part of the existing 14th and 15th holes. Some of the proposed development site is currently used as a buffer between the golf course and the boundary.
134. The report notes that as well as the necessity for the golf holes themselves to be moved outside of the proposed development site, it is essential for the altered golf holes to be designed in such a way that does not result in golf balls landing within the proposed development.
135. In accordance with industry standard safety guidelines:

- The centre line of a fairway should be at least 60 metres from an adjacent boundary;
- The centre of a green should be at least 40-60 metres from an adjacent boundary;
- The centre of any tee should be at least 30m from an adjacent boundary.

136. The proposed redesign takes into account the above safety guidelines as well as the need to retain the interest and challenge of the redesigned golf holes.

137. The key features are stated in the report as follow:

- The existing 14th hole is shortened to become a long par-3 hole to a new green located well short of the proposed development site. The proposed hole uses the existing tees and plays in the same direction as the existing hole, with the new green located more than 60m from the adjacent boundary.
- The existing 15th hole is realigned to play to the east of the proposed development site to a new green located close to the existing pond. The proposed hole plays from new tees located more than 30m from the adjacent boundary, to the existing fairway which is more than 60m from the adjacent boundary. The new green location is located 50m from the existing course boundary.
- The loss in overall course yardage from altering the 14th and 15th hole is mitigated by lengthening of other holes on the back-nine, namely the 11th, 13th and 16th.

138. Alterations in accordance to the industry standards can therefore be made to the adjacent golf holes to mitigate any loss of yardage, interest and challenge for golfers and designed and implemented to minimise the risk of golf balls landing within the proposed development site.

139. Risk mitigation from golf balls to users of the proposed footpath have been set out in a separate document 'Golf Course & Footpath Statement'. As stated above a public foot path runs across the golf course and parts of the proposed private footpath link between the application site and the hotel is an existing track used by golf buggies and maintenance vehicles already. New linking footpaths are proposed between this track and the PROW directly north of the application site and industrial units.

140. The statement sets out the proposed signage to be installed prior to occupation:

- Low level sign boards at site entry & crossing points informing pedestrians of private access only to green paths
- Signage at all entry points to paths informing pedestrians of golf activity advising necessary vigilance & caution in using the paths; all dogs to be kept on short leads
- Low level sign boards at all golf tees informing golfers of pedestrian activity on the paths & forbidding driving shots when pedestrians are traversing the relevant course zones
- White painted permanent inset ground markers at 20m intervals set along paths assisting pedestrians to follow the marked routes only

- Caravan users & golfers to be issued with safety guide on arrival illustrating the arrangement of footpaths & explaining relevant restrictions on access & golfing activity
141. Given pedestrian and golf buggy access across the golf course does already exist and subject to the implementation of the details and measures in line with industry standards as set out in the Swan Golf Designs report and the Golf Course & Footpath Statement, the risk to future occupants and footpath users are considered to be reasonably mitigated. However, Public Health and Housing can address issues from stray balls under other legislation for statutory nuisances should issues arise despite these measures.

Flood risk/ Drainage/ Pollution

142. The NPPF seeks to steer new development to areas with the lowest probability of flooding and to ensure that new development does not increase the risk of flooding elsewhere. Whilst large parts of the golf course are within flood zone 2 and 3, the application sites is within flood zone 1; low risk. In terms of flood risk the proposal is sequentially acceptable and accords with local and national policies.
143. Development Management Policy DM6 states that proposals for all new development are required to demonstrate that on site drainage will be managed so as not to cause or exacerbate flooding elsewhere.
144. Because the proposed development is located on a greenfield site and is greater than 0.5ha or 10 dwellings, there needs to be a suitable scheme implemented for the disposal of surface water. This is to prevent increased risk of flooding, both on and off the site due to the increase in the impermeable area post development. The application was submitted in support of a FRA and drainage strategy to includes permeable paved roads, the lodges use individual infiltration trenches (where 1.2m clearance to groundwater) and those lodges at the lower end of the site discharge straight to the watercourse as the depth to groundwater is too shallow. On this basis SCC Flood and Water Management raised no objection subject to conditions. The proposal as such would comply with policy DM6.

Contamination

145. Policy DM14 requires proposals for development on or adjacent to land which is known to be or potentially affected by contamination to submit an appropriate assessment of the risk levels, site investigations and implementation schedule prior to or as part of any planning application.
146. The application is supported by a Phase One Desk Study undertaken by Oakley Soils and Concrete Engineering Ltd, reference DDD/73 dated July 2019. This report provides a summary of the history and environmental setting of the site and surrounding area, includes the findings of a site walkover and provides a preliminary risk assessment. The risk assessment concludes that intrusive investigations are required.
147. The Environment Team is satisfied that the report is adequate and agree with the recommendations for intrusive investigations. The standard land contamination conditions should therefore be attached, to ensure these works are undertaken to an appropriate standard.

Air Quality

148. Paragraph 105 of the NPPF states that 'local parking standards for residential and non-residential development, policies should take into account... e) the need to ensure an adequate provision of spaces for charging plug-in and other ultralow emission vehicles.' Paragraph 110 of the NPPF states that 'applications for development should... be designed to enable charging of plug-in and other ultralow emission vehicles in safe, accessible and convenient locations.'
149. St Edmundsbury Core Strategy Policy CS2, Sustainable Development, requires the conserving and, wherever possible, enhancing of natural resources including, air quality.
150. Policy DM14 of the Joint Development Management Policies Document states that proposals for all new developments should minimise all emissions ... and ensure no deterioration to either air or water quality. The Suffolk Parking Standards (updated May 2019) state that for hotels, "25% of all parking spaces to be fitted with a charging system". Although the proposal is not for a hotel, there is no specific requirement for caravan lodge holiday homes and the site use would not be the same as a residential dwelling.
151. The Environment Team therefore suggest that the requirements for a hotel are the closest fitting and 25% of caravan holiday lodges should be fitted with charging infrastructure, should planning be granted. This can be secured by condition.

Planning Balance

152. There have been no material changes to the previously proposed scheme. The application would provide pitches for the stationing of 35 caravans for holiday use on parts of the existing golf course. This is to supplement the existing accommodation on the site and to rationalise the existing golf course thereby making it more financially viable. The proposal would provide economic and social benefits from the construction period, additional spend during operation and additional employment opportunities.
153. The proposal is broadly policy compliant and supported by guidance in the NPPF. Whether the impact on the character and appearance of the area is such to justify refusal is a matter of planning judgement. The proposal is considered acceptable with regards to highways matters, residential amenity and all other material considerations.
154. The proposal will result in the removal of a significant number of category B and C trees, including two rows of Lombardi Poplars, assessed as being of high amenity value. The site is not in any designated Special Landscape Area, the trees are not protected and the lifespan of poplars is relatively short. The proposal was judged by the Ecology and Landscape Officer to have a harmful effect. This vegetation is of ecological value at a site level and makes an important contribution to the setting of Bury St Edmunds and the gap between the town and the village of Fornham All Saints.

155. The proposal includes a substantial soft landscaping scheme, including trees to be retained and showing a good level of planting across the proposed site. The proposal will only be visible in short views to receptors from the A1101, Pigeon Lane and the river footpath. The visual impacts will in time be reduced by the mitigation planting and cannot be considered to adversely affect the character of the PROW as a whole, either once planting has established or even at the outset immediately following planting, and thus the proposal would not be contrary to policy DM44 - Rights of Way.

156. It is acknowledged that the proposed shrub and tree screen planting will take time to establish and particularly in winter the proposed development may not be completely concealed. In this context therefore it can be concluded that any adverse visual impact will be more significant at the outset, albeit diminishing over time as the landscaping matures. However, the caravans are single storey, modest in scale and not particularly prominent because of the intervening greenery and the backdrop of industrial buildings. The visual impacts of the development are demonstrated by the submitted visualisation.

157. Until the screening matures the caravans will be seen in the context of the existing golf course within the wider designated open space used for leisure activities. However, the application proposes external timber cladding, in order to assist the buildings to blend in with the surroundings.

158. It is Officers view that in this context, the proposed soft landscaping will in time adequately mitigate the effects of the proposed development. On this basis the proposals are not considered to have such an adverse effect on the visual amenities of the area for the harm to demonstrably outweigh the economic and social benefits from additional local spend and employment opportunities to justify refusal.

Conclusion:

159. In conclusion, the principle and detail of the development is considered to be acceptable and in compliance with relevant development plan policies and the National Planning Policy Framework.

Recommendation:

160. 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:

Reference No:	Plan Type	Date Received
GUA-DR-L-001 P01 467/PH1	PLAN Parking Plan	22.04.2020 22.04.2020
GUA-DR-L-002 P04 1010044/SK001 C	Soft Landscape Proposals Access Plan	08.06.2020 08.06.2020
GUA-DR-L-003 P04 Golf Course and Footpath Statement 467/FP1/B	Detail Planting Plan FOOTPATHS Proposed Site Layout Plan	08.06.2020 28.05.2020 28.05.2020
ARCHAEOLOGICAL PRE- DETERMINATION EVALUATION GOLF COURSE ALTERATIONS REPORT 467 SL1	Archaeological report Report	 22.04.2020
467 P1 B	Location Plan Proposed Block Plan	22.04.2020 22.04.2020

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

- 3 Before first occupation details of the timber cladding to the caravans 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 safeguard the character and appearance of the area, in accordance with policy DM2 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 12 of the National Planning Policy Framework and all relevant Core Strategy Policies.

- 4 Prior to commencement of development the following components to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the Local Planning Authority:
- i) A site investigation scheme,
 - ii) The results of a site investigation based on i) and a detailed risk assessment, including a revised Conceptual Site Model (CSM),
 - iii) Based on the risk assessment in ii), a remediation strategy giving full details of the remediation measures required and how they are to be undertaken. The strategy shall include a plan providing details of how the remediation works shall be judged to be complete and arrangements for contingency actions.

Reason: To protect and prevent the pollution of controlled waters, future end users of the land, neighbouring land, property and ecological systems from potential pollutants associated with current and previous land uses in accordance with policy DM14 of the West Suffolk Joint Development Management Policies Document 2015, paragraphs 170,178 and 179 of the National Planning Policy Framework (NPPF), Environment Agency Groundwater Protection: Principles and Practice (GP3) and all relevant Core Strategy Policies. This condition requires matters to be agreed prior

to commencement since it relates to consideration of below ground matters that require resolution prior to further development taking place, to ensure any contaminated material is satisfactorily dealt with.

- 5 No occupation of any part of the permitted development shall take place until a verification report demonstrating completion of works as set out in the remediation strategy is submitted to and approved, in writing by the Local Planning Authority.

Reason: To protect and prevent the pollution of controlled waters, future end users of the land, neighbouring land, property and ecological systems from potential pollutants associated with current and previous land uses in accordance with policy DM14 of the West Suffolk Joint Development Management Policies Document 2015, paragraphs 170,178 and 179 of the National Planning Policy Framework (NPPF), Environment Agency Groundwater Protection: Principles and Practice (GP3) and all relevant Core Strategy Policies. This condition requires matters to be agreed prior to commencement since it relates to consideration of below ground matters that require resolution prior to further development taking place, to ensure any contaminated material is satisfactorily dealt with.

- 6 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 to the Local Planning Authority 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, future end users of the land, neighbouring land, property and ecological systems from potential pollutants associated with current and previous land uses in accordance with policy DM14 of the West Suffolk Joint Development Management Policies Document 2015, paragraphs 170,178 and 179 of the National Planning Policy Framework (NPPF), Environment Agency Groundwater Protection: Principles and Practice (GP3) and all relevant Core Strategy Policies.

- 7 No development shall commence until a detailed surface water drainage scheme for the site, based on the agreed Flood Risk Assessment [Ref:- 029/2019/FRADS by GH Bullard and dated September 2019] and Drainage Strategy [drawing ref:- 029/2019/11 Rev P2 by GH Bullard and dated Sept 2019] has been submitted to and approved in writing by the local planning authority and will demonstrate that surface water run-off generated up to and including the critical 100 year +CC storm will not exceed the run-off from the existing site following the corresponding rainfall event. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed. Infiltration systems shall only be used where it can be demonstrated that they will not pose a risk to groundwater quality. Further details of which will include:

Details of further infiltration testing on site in accordance with BRE 365 to verify the permeability of the site (trial pits to be located where soakaways are proposed and repeated runs for each trial hole). Borehole records should also be submitted in support of soakage testing and groundwater

checks also given the proximity to the ordinary watercourse.

Reason: To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of water drainage, in accordance with policy DM6 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 14 of the National Planning Policy Framework and all relevant Core Strategy Policies. The condition is pre-commencement as it may require the installation of below ground infrastructure and details should be secured prior to any ground disturbance taking place.

- 8 Prior to commencement details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) shall be submitted to and agreed in writing by the local planning authority. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP and shall include:
- i. Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include:-
 1. Temporary drainage systems
 2. Measures for managing pollution / water quality and protecting controlled waters and watercourses
 3. Measures for managing any on or offsite flood risk associated with construction

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/construction-surface-water-management-plan/>

Reasons. To ensure clear arrangements are in place for the management of water drainage during construction to ensure the development does not cause increased flood risk, or pollution of watercourses or groundwater, in accordance with policy DM6 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 14 of the National Planning Policy Framework and all relevant Core Strategy Policies. The condition is pre-commencement as it may require the installation of below ground infrastructure and details should be secured prior to any ground disturbance taking place.

- 9 Before any works are undertaken, full details of a scheme for the eradication and/or control of the Japanese Knotweed identified on site shall be submitted to and approved by the Local Planning Authority prior to the commencement of work on site, and the approved scheme shall be implemented prior to the commencement of the use of the building(s). Please note that Japanese Knotweed can be far more extensive than the visible parts on the surface and that the underground parts of the plant may extend laterally up to 7 metres beyond this. Therefore, the scheme must also note and cover any knotweed adjoining the site.

Reason: Japanese Knotweed is a highly invasive weed that is capable of structural damage. This condition is pre-commencement to avoid disturbance of the weed as this will cause it to spread and its movement is controlled by legislation. Under the Wildlife and Countryside Act 1981 it is illegal to cause it to spread in the wild.

- 10 All planting comprised in the approved details of landscaping shall be carried out in the first planting season following the 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 ensure a satisfactory environment, in accordance with policies DM2, DM12 and DM13 of the West Suffolk Joint Development Management Policies Document 2015, Chapters 12 and 15 of the National Planning Policy Framework and all relevant Core Strategy Policies.

- 11 The development hereby approved shall be implemented in accordance with the details set out in the TREE SURVEY, AIA AND ARB METHOD STATEMENT Rev. 7640 and the trees to be retained as shown on the approved soft landscaping scheme 1965-GUA-DR-L-002 P04 shall be protected during construction in accordance with BS 5837:2012 - Trees in relation to construction - Recommendations. The protective measures contained with the tree report shall be implemented prior to commencement of any development, site works or clearance in accordance with the approved details, and shall be maintained and retained until the development is completed. Within the root protection areas the existing ground level shall be neither raised nor lowered and no materials, temporary buildings, plant, machinery or surplus soil shall be placed or stored thereon. If any trenches for services are required within the fenced areas they shall be excavated and backfilled by hand and any tree roots encountered with a diameter of 25mm or more shall be left unsevered. Any trees shown to be retained removed, dying or becoming seriously damaged or diseased within five years of commencement shall be replaced within the first available planting season thereafter with a replaced with the same species tree unless the Local Planning Authority gives written consent for any variation.

Any retained trees removed, dying or becoming seriously damaged or diseased within five years of commencement 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 ensure that the trees on site are adequately protected, to safeguard the character and appearance of the area, in accordance with policy DM12 and DM13 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 15 of the National Planning Policy Framework and all relevant Core Strategy Policies. This condition requires matters to be agreed prior to commencement of development to ensure that existing trees are adequately protected prior to any ground disturbance.

- 12 All ecological measures and/or works shall be carried out in accordance with the details contained in the Ecological Impact Assessment Report (EIA), Huckle Ecology Ltd, August 2019 18101R2v1 and ECOLOGICAL BAT

ADDENDUM REPORT 18101 R3 V1 as already submitted with the planning application and agreed in principle with the Local Planning Authority prior to determination.

Reason: To secure biodiversity enhancements commensurate with the scale of the development, in accordance with policy DM12 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 15 of the National Planning Policy Framework and all relevant Core Strategy Policies.

- 13 Prior to occupation details of biodiversity enhancement measures to be installed at the site (to include 6 bat boxes as already agreed in principle), including details of the timescale for installation, shall be submitted to and approved in writing by the Local Planning Authority. Any such measures as may be agreed shall be installed in accordance with the agreed timescales and thereafter retained as so installed. There shall be no occupation unless and until details of the biodiversity enhancement measures to be installed have been agreed in writing by the Local Planning Authority.

Reason: To secure biodiversity enhancements commensurate with the scale of the development, in accordance with policies DM11 and DM12 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 15 of the National Planning Policy Framework and all relevant Core Strategy Policies.

- 14 No external artificial lighting shall be installed on the site or path until an External Lighting Strategy (ELS) has first been submitted to and approved in writing by the Local Planning Authority. The ELS shall identify measures to control the amount of artificial lighting used on the site taking into account the specifications set out in the Bat Conservation Trust 'Bats and Lighting in the UK' 2008 guidelines. Details must include:
- a) Identification of those areas/features on site that are particularly sensitive for bats and that are likely to be disturbed;
 - b) The locations and method by which external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the species recorded using their territory or having access to their breeding sites and resting places.

Reason: To avoid adverse effects on bat habitat and safeguard the visual amenities of the locality and the ecological value of the area, in accordance with policies DM2, DM11 and DM12 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 15 of the National Planning Policy Framework and all relevant Core Strategy Policies.

- 15 The caravans hereby permitted shall only be occupied for holiday use and shall not be used for permanent residential accommodation. No letting shall exceed a period of three months and no lodge shall be occupied by any one individual for a period exceeding three months within any twelve month period. The owners/operators shall maintain an up to date register of the names of all owners/occupiers of individual lodges on the site, and of their main home addresses, and shall make this information available at all reasonable times to the Local Planning Authority.

Reason: To safeguard the character and appearance of the area, in

accordance with policy DM34 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 6 of the National Planning Policy Framework and all relevant Core Strategy Policies.

- 16 No development shall take place on 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. Timetable for the site investigation to be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development in accordance with policy DM20 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 16 of the National Planning Policy Framework and all relevant Core Strategy Policies. This condition is required to be agreed prior to the commencement of any development to ensure matters of archaeological importance are preserved and secured early to ensure avoidance of damage or loss due to the development and/or its construction. If agreement was sought at any later stage there is an unacceptable risk of loss and damage to archaeological and historic assets.

- 17 No caravan shall be occupied or otherwise used until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under Condition 16 and the provision made for analysis, publication and dissemination of results and archive deposition has been secured.

Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development in accordance with policy DM20 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 16 of the National Planning Policy Framework and all relevant Core Strategy Policies.

- 18 The new vehicular access shall be laid out and completed in all respects in accordance with Drawing No.'s; 1010044/SK001 Rev C and GUA-DR-L-002

Rev P04, including the relocation of affected existing highway infrastructure and with an entrance width of 6.0m and made available for use prior to first use.

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 accordance with policy DM2 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 9 of the National Planning Policy Framework and all relevant Core Strategy Policies. This condition requires matters to be agreed prior to commencement since it relates to highway safety and it is necessary to secure details prior to any other works taking place.

- 19 Prior to the development hereby permitted being first occupied, the proposed access onto the A1101 shall be properly surfaced with a bound material for a minimum distance of 10 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 an appropriate vehicular access surface and to prevent hazards caused by loose materials being carried out into the highway, in accordance with policy DM2 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 9 of the National Planning Policy Framework and all relevant Core Strategy Policies.

- 20 Before any above ground works take place details of the areas to be provided for storage, presentation and collection of Refuse/Recycling bins shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.

Reason: To ensure the incorporation of waste storage and recycling arrangements, in accordance with policies DM2 and DM14 of the West Suffolk Joint Development Management Policies Document 2015, Chapters 12 and 15 of the National Planning Policy Framework and all relevant Core Strategy Policies.

- 21 No development above ground shall take place until details have been 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: To prevent hazards caused by flowing water or ice on the highway, in accordance with policy DM2 and DM6 of the West Suffolk Joint Development Management Policies Document 2015, Chapters 9 and 14 of the National Planning Policy Framework and all relevant Core Strategy Policies.

- 22 Before the development is commenced, details of the internal roads and footpaths, (including layout, levels, widths, gradients, surfacing, lighting

and means of surface water drainage), shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that roads/footways are constructed to an acceptable standard for the safety of future users, in accordance with policy DM2 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 9 of the National Planning Policy Framework and all relevant Core Strategy Policies.

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

The Plan shall include, but not be limited to:

- Routing for HGV and construction delivery traffic
- Means to ensure surface water, mud or other debris cannot flow onto the highway
- Means to ensure sufficient space is allocated and used on site for the parking and manoeuvring of construction and delivery vehicles
- Means to ensure sufficient space is available on site for the storage of equipment, materials and other associated

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 and construction traffic in sensitive areas, in the interest of highway safety, in accordance with policy DM2 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 9 of the National Planning Policy Framework and all relevant Core Strategy Policies.

- 24 No above ground development shall take place until details of the areas to be provided for the loading, unloading, manoeuvring, parking of vehicles, including secure cycle storage, have been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To ensure that sufficient space for the on-site parking of vehicles is provided, in accordance with policy DM2 and DM46 of the West Suffolk Joint Development Management Policies Document 2015, Chapters 9 and 12 of the National Planning Policy Framework and all relevant Core Strategy Policies.

- 25 Before the access is first used clear visibility at a height of 0.6 metres above the carriageway level shall be provided and thereafter permanently maintained in that area between the nearside edge of the metalled carriageway and a line 2.4 metres from the nearside edge of the metalled carriageway at the centre line of the access point and a distance of 120 metres in each direction along the edge of the metalled carriageway from

the centre of the access. Notwithstanding the provisions of Part 2, Class A of the Town and Country Planning (General Permitted Development) Order 2015 as amended (or any Order revoking and re-enacting that Order) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the area of the visibility splays.

Reason: To ensure vehicles exiting the access have sufficient visibility to enter the public highway safely and vehicles on the public highway have sufficient warning of a vehicle emerging to take avoiding action in the interests of road safety, in accordance with policy DM2 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 9 of the National Planning Policy Framework and all relevant Core Strategy Policies.

- 26 Before any of the hereby approved units are brought onto site an Electric Vehicles Charge Point Strategy Plan shall be submitted to and approved in writing by the Local Planning Authority. The submitted strategy shall set out the phasing for the delivery of the approved caravan lodge holiday homes and which of the units are served by Electric Vehicle Charge Points (EVCP). The submitted strategy will demonstrate that 25% of the units will be served by a dedicated EVCP which shall deliver a minimum 7kwh charge. The approved details shall be implemented before the unit that they relate to is first occupied. Thereafter the installed EVCP shall be retained and maintained in an operational condition.

Reason: To promote and facilitate the uptake of electric vehicles on the site in order to minimise emissions and ensure no deterioration to the local air quality, in accordance with Policy DM14 of the Joint Development Management Policies Document, paragraphs 105 and 110 of the National Planning Policy Framework (NPPF) and the Suffolk Parking Standards.

- 27 No development shall take place until details of the proposed footway link to All Saints Hotel and as shown on drawing 467 FP1A has been submitted to and approved by the Local Planning Authority. The approved footway works shall be laid out and constructed in their entirety prior to occupation of any of the caravans hereby approved. Thereafter the approved footway link shall be retained in its approved form.

Reason: To secure the provision and improvements to access including connections to the existing PRoW and safe circular walks through the golf course and to the hotel to encourage the residents to remain within the locality rather than drive to the SPA, in accordance with policies DM10 and DM12 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 15 of the National Planning Policy Framework and all relevant Core Strategy Policies.

- 28 All mitigation measures as set out in the Habitats Regulations Report 1879 R3 v3 dated January 2020 shall be carried out in accordance with the details contained in paragraph 4.3.11 of the report and agreed in principle with the Local Planning Authority prior to determination.

Reason: To secure biodiversity enhancements commensurate with the scale of the development, in accordance with policy DM12 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 15 of the National Planning Policy Framework and all relevant Core Strategy Policies.

Documents:

All background documents including application forms, drawings and other supporting documentation relating to this application can be viewed online [DC/20/0682/FUL](#)