

## **8. CHAPTER 8 – RECREATION AND TOURISM**

### **8.1 PARAGRAPH 8.6 INTRODUCTION**

#### **The Objections**

##### **1366 English Heritage**

Suggests that objective 3 should be expanded to include reference to the historic environment.

#### **Inspector's Reasoning and Conclusions**

8.1.1 I consider that this issue has been addressed by the insertion of the term "Cultural Heritage" at Second Deposit stage.

#### **RECOMMENDATION**

Make no modification to the Plan in response to this objection.

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### **8.2 PARAGRAPH 8.11 SPORTS FACILITIES**

#### **The Objections**

##### **1048 Hadleigh Town Council**

Suggests that existing facilities, such as the Hadleigh swimming pool should be supported.

#### **Inspector's Reasoning and Conclusions**

8.2.1 I consider that this issue has been addressed by the insertion of appropriate text at Second Deposit stage.

#### **RECOMMENDATION**

Make no modification to the Plan in response to this objection.

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### **8.3 PARAGRAPH 8.12 PLAYING FIELDS**

#### **The Objections**

##### **3656 Mrs C Waters**

No land has been allocated around Capel St Mary for additional recreational, amenity and sports facilities. New playing fields are required for the village and it is likely that there will be considerable objection to them. Therefore she objects to the rewording of the paragraph.

### **Inspector's Reasoning and Conclusions**

8.3.1 There is nothing in this paragraph that would restrict the development of suitable land for recreation, amenity and sports facilities in Capel St Mary, but I do not consider that the provision of such facilities needs a specific allocation in the Plan.

### **RECOMMENDATION**

Make no modification to the Plan in response to this objection.

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## **8.4 PARAGRAPH 8.14 PLAYING FIELDS**

### **The Objections**

#### **3191 Sport England (East)**

We consider that the supporting text should also refer to the new PPG17 which was published in July 2002, specifically reference should be made to Para. 15 (Development on Playing Fields).

#### **5337 Suffolk County Council**

This section also needs to say that Secretary of State approval is required for any disposal of school playing fields. The issue of encouraging public use of school playing fields by dogs is of the utmost importance so they cannot become open space.

#### **B.D.C is proposing a change to Paragraph 8.14 Pre-Inquiry Change 125**

Amend final sentence of 8.14 as follows: ' The District Council will refer to the Planning Policy Statement published by Sport England (ref. ESC/675/7.5M/7/97) which advises on five possible situations where there might not be any objection to the development of playing fields or parts of them. **This advice is further updated by paragraph 15 in PPG17, published in July 2002.** '

### **The Objections**

#### **13172 Sport England**

Object to the reference to Sport England policy being updated by PPG17 as they are separate documents, albeit that they closely reflect each other. Suggest amending text to 'This advice is also closely reflected in Paragraph 15 of PPG17 'Planning for Open Space, Sport and Recreation' (July 2002)'

### **Inspector's Reasoning and Conclusions**

8.4.1 Given the contents of revised PPG 17 in relation to this matter and the Secretary of State's *Playing Fields Direction* (1998), this paragraph needs to be substantially updated. Furthermore the proposed change does not give sufficient clarity regarding these changes and the whole second part of the paragraph should be amended.

### **RECOMMENDATION**

Modify the Plan by deleting the paragraph after the end of the second sentence and replace with the following text.

**The District Council will encourage the County Council to allow increased public use of school playing fields.**

**PPG 17 strongly resists the loss of such facilities where they are in active use and Paragraph 15 of the PPG sets out a series of tests that should be met in order to allow the development of playing fields. Furthermore the *1998 Playing Fields Direction* requires that Sport England (formerly the English Sports Council) is notified when development is proposed for playing fields owned by a local authority or an educational institution.**

**Sport England's Planning Policy Statement sets out the circumstances where there may not be a reason to object to such an application. Where Sport England do object to an application and the Council are still minded to allow such development, the Secretary of State should be notified.**

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## 8.5 POLICY RE03 PLAYING FIELDS

### **The Objections**

#### **728 GO-East**

Policies in the development plan are implemented not only by the District Council, but also the County Council, the Planning Inspectorate and the Secretary of State. Policies should not therefore include phrases such as "the District Council" or the "local planning authority. Request that the policy should relate to development and land use and be relegated to supporting text.

**3190 Sport England (East)**

Support policy. However would have preferred to see supporting text making reference to Sport England policies included within the policy itself.

**Inspector's Reasoning and Conclusions**

8.5.1 Changes made at Second Deposit have gone some way to addressing Go-East concerns but I consider that the Policy is still overly vague in its approach and does not take the rigorous approach to protection of such facilities required by PPG17. There is a clear necessity for such a Policy, given these national policy requirements and I have set out a modified form of the Policy that improves its clarity in my recommendations below. Given the modification that I have made to Paragraph 8.14, I do not consider that there is any necessity to amend the Policy to meet Sport England's concerns.

**RECOMMENDATION**

Modify the Plan by deleting Policy RE03 and replacing with the following Policy.

**Development on playing fields will not be permitted unless it can be shown that;**

**There is a surplus of other similar suitable facilities in the local catchment area and;**

**The facility is under used by the local community.**

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8.6 POLICY RE06 PUBLIC OPEN SPACE IN NEW RESIDENTIAL LAND ALLOCATIONS

**The Objections**

**730 GO-East**

Request that the Policy should relate to development and land use and be relegated to supporting text.

## **Inspector's Reasoning and Conclusions**

8.6.1 This Policy sets out the Council's intentions as to how it will seek open space provision from new housing developments and the type of enhancements that may be required. As such it does not form a Policy for the assessment of development proposals nor does it set out requirements for site specific allocations. This is contrary to advice in PPG 12. Therefore the Policy should be deleted. As the issues addressed in the Policy are already set out in Paragraph 8.20 the Policy's wording should not be retained in the supporting text.

### **RECOMMENDATION**

Modify the Plan by deleting Policy RE06.

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## **8.7 POLICY RE07 SMALL- AND MEDIUM-SCALE RECREATION**

### **The Objections**

#### **1221 Mr S Kosciuszko Able/Bishop & Company**

Considers that policy should be cross-referenced to policy CR01, and that proposals should justify their location in light of the overall policy of restraint in the countryside.

#### **1367 English Heritage**

Objection to the use of the word "significant" as it implies acceptance of a lower level of activity, which may prejudice the historic environment.

#### **1391 Suffolk Coast & Heaths Project**

Objection to policy wording.

### **Inspector's Reasoning and Conclusions**

8.7.1 In terms of the first issue, as the Plan should be read as a whole there is no necessity to include a cross reference to Policy CR01. The word significant has been removed in the amalgamation of Policies RE07 & RE08 made at Second Deposit stage. I consider that the reworded Policy is acceptable.

### **RECOMMENDATION**

Make no modification to the Plan in response to these objections.

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## 8.8 POLICY RE08 SMALL- AND MEDIUM-SCALE RECREATION

### The Objections

#### **1222 Mr S Kosciuszko Able/Bishop & Company**

Considers that policy should be cross-referenced to policy CR01, and that proposals should justify their location in light of the overall policy restraint in the countryside. Suggests minor rewording to "Best and Most Versatile Agricultural Land".

### Inspector's Reasoning and Conclusions

8.8.1 I have addressed the first part of the objector's concerns in my response to objections to Policy RE07 and for the reasons set out there do not consider that a cross reference to Policy CR01 is appropriate. The objector's second concern has been addressed by changes made at Second Deposit stage. See also RE07 above.

### RECOMMENDATION

Make no modification to the Plan in response to this objection.

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## 8.9 POLICY RE09 LARGE-SCALE RECREATION

### The Objections

#### **733 GO-East**

Suggests that a sequential approach starting with town centres should be used.

#### **1223 Mr S Kosciuszko Able/Bishop & Company**

Considers that policy should be cross-referenced to policy CR01, and that proposals should justify their location in light of the overall policy of restraint in the countryside. Suggests minor rewording to "Best and Most Versatile Agricultural Land".

#### **1893 Ipswich Borough Council**

Supports concept of Wherstead Country Park, which should be identified with policy RE09. Also suggests further areas for inclusion, and advises that the proposal should not be linked to a housing scheme, ie policy HS09T.

### Inspector's Reasoning and Conclusions

8.9.1 PPS6 sets out a sequential approach to the location of town centre uses. PPS6 is clear that for recreational

and leisure uses that would be appropriate for a town centre location this test would apply. This is not reflected in the Policy and the amendments made at Second Deposit stage do not go far enough in setting out the precise requirements of the sequential test and where these would apply. I have recommended suitable modifications to address this.

- 8.9.2 This policy does not preclude the creation of a country park in Wherstead. See my comprehensive report on Wherstead, including a hotel site and country park in the Housing Chapter of the Plan at HS09T, (a previous allocation deleted at the Second Deposit stage).

## **RECOMMENDATION**

After the first sentence of Policy RE09 add the following sentence

**Proposals for uses that are appropriate for town centre locations will have to be sequentially acceptable.**

Add the following new paragraph to the Policy's supporting text after Paragraph 8.26:

**The sequential test, set out in PPS6, applies to all town centres uses, including those recreation and leisure uses that can be located in town centres. Proposal for such uses out of town centres will have to show that there are no more sequentially acceptable sites available.**

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8.10 PARAGRAPH 8.27 SHOTLEY PENINSULA AND THE SUFFOLK COAST AND HEATHS

### **The Objections**

#### **1392 Suffolk Coast & Heaths Project**

Concerned to ensure that the text is correct, in that it refers to the new Management Strategy.

### **Inspector's Reasoning and Conclusions**

8.10.1 I consider that the objector's concerns have been met by changes made at Second Deposit stage.

## **RECOMMENDATION**

Make no modification to the Plan in response to this objection.

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### 8.11 POLICY RE10 SHOTLEY PENINSULA AND THE SUFFOLK COAST AND HEATHS

#### **The Objections**

##### **1393 Suffolk Coast & Heaths Project**

Objection to policy wording, suggests revised wording to the second half of the policy: - 'most recreational provision within the AONB area will be expected to be informal in nature and should reflect the special qualities of the area. Landscape and biodiversity considerations will predominate and large-scale recreational development and other major visitor developments will not be permitted.'

#### **Inspector's Reasoning and Conclusions**

8.11.1 While changes made at Second Deposit stage do not entirely accord with the objector's suggested wording, I consider that these changes meet the broad concerns and do not require further amendment.

## **RECOMMENDATION**

Make no modification to the Plan in response to this objection.

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### 8.12 PARAGRAPH 8.29 DEDHAM VALE AND STOUR VALLEY

#### **B.D.C is proposing a change to Paragraph 8.29 Pre-Inquiry Change 126**

Revise as follows: 'That Management Plan was adopted by the District Council as Supplementary Planning Guidance. The current Management Plan ~~is under review, and may be finalised before adoption of this Local Plan. It will provide further guidance on recreation provision within the Area of Outstanding Natural Beauty and Project area.~~ **will be superseded by the Dedham Vale and Stour Valley Management Strategy which will be completed by March 2004**'.

#### **The Objections**

None

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## 8.13 POLICY RE11 DEDHAM VALE AND STOUR VALLEY

### **The Objections**

#### **735 GO-East**

Overly-detailed, lengthy plans are likely to lead to an increased number of objections, delay the adoption of the plan and result in more departures. Policies which repeat the provision of other policies are unnecessary.

### **Inspector's Reasoning and Conclusions**

8.13.1 While I broadly concur with the Go-East comments about the overly lengthy nature of the Plan, in this instance there are differences in the type of recreational facilities that would be acceptable in each AONB area, given their different characters. Therefore to have an individual policy concerning recreational development in each AONB is acceptable.

### **RECOMMENDATION**

Make no modification to the Plan in response to this objection.

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## 8.14 POLICY RE12 THE IPSWICH URBAN FRINGE

### **The Objections**

#### **736 GO-East**

Overly-detailed, lengthy plans are likely to lead to an increased number of objections, delay the adoption of the plan and result in more departures. Policies which repeat the provision of other policies are unnecessary.

### **Inspector's Reasoning and Conclusions**

8.14.1 I find that given the Council's specific intention for these two areas, it is reasonable that the Plan includes a Policy concerned with recreational development. However as the Plan should be read as a whole, the final sentence, which cross refers to Policy RE09, is superfluous.

## **RECOMMENDATION**

Modify the Plan by deleting the final sentence of Policy RE12.

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### 8.15 POLICY RE17 WATER-BASED RECREATION

#### **The Objections**

##### **739 GO-East**

Overly-detailed, lengthy plans are likely to lead to an increased number of objections, delay the adoption of the plan and result in more departures. Policies which repeat the provision of other policies are unnecessary.

#### **Inspector's Reasoning and Conclusions**

8.15.1 In this instance, I can see no benefit in having a Policy to deal with this issue, as the criteria are all adequately covered by other Plan policies, both in this Chapter and the Plan as a whole. Therefore I consider that the Policy should be deleted.

## **RECOMMENDATION**

Modify the Plan by deleting Policy RE17.

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### 8.16 POLICY RE19 MOORINGS AND MARINAS

#### **The Objections**

##### **1370 English Heritage**

Objection to the use of the word "significant" as it implies acceptance of a lower level of activity, which may prejudice the historic environment.

#### **Inspector's Reasoning and Conclusions**

8.16.1 I do not feel strongly about the deletion of the word "significant" as the *significance* of any impacts are a factor to be dealt with when assessing specific development proposals. On balance I will support the objection.

## **RECOMMENDATION**

Modify the Plan by deleting the word "significant" from the second paragraph.

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### 8.17 PARAGRAPH 8.46 THE DISTRICT COUNCILS STRATEGY – LAVENHAM

#### **The Objections**

##### **1164 Lavenham Parish Council**

Suggests that Lavenham Working Party must meet to consider local parking issues, and that parking should remain free.

##### **1180 Mr C A Reeve**

Suggests that remit of working party, if reconvened, should be widened to incorporate dealing with traffic movement and weight restrictions.

##### **1278 The Lavenham Society**

Suggests that the Lavenham working party, if reconvened should have a wider remit to encompass traffic calming and weight restrictions.

#### **Inspector's Reasoning and Conclusions**

8.17.1 Paragraph 8.46 sets out the historical background to how some of the negative impacts of tourism at Lavenham have been addressed. It is beyond the remit of my report to require that the Lavenham Working Party reconvenes or what it discusses if it does, as these are matters for the internal working of the Council. No modification of the Plan is therefore justified.

## **RECOMMENDATION**

Make no modification to the Plan in response to these objections.

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### 8.18 PARAGRAPH 8.47 THE DISTRICT COUNCILS STRATEGY – KERSEY

#### **The Objections**

##### **5338 Suffolk County Council**

There are two paragraphs 8.47 on page 246 and another on page 247. In the second para 8.47 in the last sentence, 'of' should be added after 'the provision'.

**B.D.C is proposing a change to Paragraph 8.47 Pre-Inquiry Change 127**

Amend final sentence to read: 'Consultation will be undertaken with local residents and interested parties, into the scope for the restriction of visitor parking and the provision **of** a car park on the edge of the village. '

**The Objections**

None

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8.19 POLICY RE28 TOURIST ATTRACTIONS

**The Objections**

**748 GO-East**

Overly-detailed, lengthy plans are likely to lead to an increased number of objections, delay the adoption of the plan and result in more departures. Policies which repeat the provision of other policies are unnecessary.

**Inspector's Reasoning and Conclusions**

8.19.1 The Policy largely repeats the requirements of other Plan policies. This type of development is not so unique that it requires an individual policy, nor does it raise any special issues that cannot be assessed against other Plan policies. The Policy should therefore be deleted.

**RECOMMENDATION**

Modify the Plan by deleting Policy RE28.

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8.20 POLICY OR TEXT OMISSIONS

**The Objections**

**94 Mr NHJS Moyes**

Objects to the omission of policies LP93, LP116 and LP124 which were in the BLP Alteration No.1.

**911 The Lavenham Society**

There is lack of recognition of Lavenham's special place as a tourist location. Such recognition will present opportunities which can be addressed through the Local Plan.

**1045 Hadleigh Town Council**

There is no reference to Hadleigh in terms of recreation and tourism, in particular the existence of recreational facilities.

**1103 Greenways Project**

Advises that there is a new Project Strategy published in 2001.

**1128 Sudbury & District Chamber of Commerce**

Suggests that there is a need to promote a suitable brand image reflecting the character, history, resources and people of Sudbury.

**1144 Lavenham Parish Council**

Feels that greater emphasis should be given to the importance of Lavenham as a location of national and international historic interest, and that the tourist trade should be maintained.

**1319 Mrs J Byrne**

No reference or support in relation to Hadleigh is mentioned.

**2689 Greenways Project**

Objects to no mention of Belstead Brook Park.

**Inspector's Reasoning and Conclusions**

- 8.20.1 Policies LP93, LP116 and LP124 in the Babergh Local Plan Alteration No.1, have effectively been replaced by Policies CR01, RE08 and RE12 respectively. I am satisfied that these Policies address the same issues as those found in the first alteration of the Plan and no further modification is necessary with respect to this issue.
- 8.20.2 As regards the concerns of the Greenways Project, changes made to the Plan at Second Deposit stage have addressed the objector's concerns and there is no need for the Plan to be further amended.
- 8.20.3 While I recognise the importance of Lavenham both as a tourist location, and a historically important village, I am satisfied that the Plan adequately addresses the land use planning issues associated with these matters and no further modification is necessary. Similarly, I am satisfied that where it lies within the remit of the land use planning system, the Plan adequately addresses

development at both Hadleigh and Sudbury. To use the Plan as promotional tool for these settlements in the manner suggested by the developer would be contrary to PPG12.

**RECOMMENDATION**

Make no modification to the Plan in response to these objections.

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