

<b>Parish:</b>	<b>HADLEIGH</b>	
<b>Location:</b>	<b>Land west of The Donkey, Stone Street</b>	
<b>Proposal:</b>	<b>Construction of new facilities for Hadleigh Bowling Club, together with ancillary facilities (relocating from Magdalen Road, Hadleigh)</b>	
<b>Applicant:</b>	<b>Mr John Harding, Cameron Hamilton Homes</b>	
<b>Case Officer:</b>	<b>Graham Chamberlain</b>	<b>Date for Determination: 21 August 2009</b>

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**This application is reported to committee as the proposal represents a departure from the development plan and representations have been received which are at variance to the recommendation.**

### **THE SITE**

1. The site is located to the north of Hadleigh on the northern side of the A1071 main road connecting Sudbury with Ipswich. The site is currently an undeveloped paddock. The site is accessed off Stone Street, a rural road. The area has a rural fell and appearance.
2. To the north of the site is the River Brett, the site is just outside of the flood zone. To the west of the site is a well screened factory (Stone Street Court) set back from Stone Street, the factory used to be a farm. To the south east of the site are a number of vernacular style cottages, some of which are listed, all facing the road giving a pleasing street scene. To the south west of the site is high quality open countryside. The site is located within the River Valley of the River Brett.
3. The site is located within the Countryside, is within a Special Landscape Area and is an Area of High Archaeological Potential.

### **THE PROPOSAL**

4. The proposal is to relocate Hadleigh Bowls Club to this site (from the town centre site). This will enable the development of the current bowls club site in Magdalene Road for a care home. An application for a care home has been submitted and is also on the committee schedule – B/09/00602.
5. The proposal is to construct a bowls green measuring 40m by 40m in the centre of the site. To the east of the bowls green there would be a single storey club house measuring 6.4m in height, 25m in width and 12.5m in depth, with a veranda on the east elevation over looking the bowls green.
6. A machinery store has been identified on the block plan in the south east corner of the site. No elevations have been submitted, these have been requested.
7. The floor area of the building would be 320sqm. The existing club house in Hadleigh is 127sqm.
8. The times of use are not known. It is unclear whether the club house would be used for functions, hired out for parties etc. This has been queried with the applicants.

9. There would be 69 car parking spaces, 3 motorcycle spaces, 5 disability spaces, 8 cycle spaces and a coach parking lay-by. The parking is arranged so that it is predominantly to the front of the site.

## RELEVANT HISTORY

10. B/09/00001 – Erection of Bowls Club on Land West of Oxford Drive, Hadleigh. This application was for the same facility but closer to Hadleigh Town Centre. The site was in the countryside. The applicants have proposed in the current application under consideration exactly the same building as that withdrawn.

## NATIONAL GUIDANCE

11. **PPS1** (Delivering Sustainable Development)  
12. **PPG15** (Planning and the Historic Environment)  
13. **PPG16** (Archaeology and Planning)  
14. **PPG13** (Transport)  
15. **PPG17** (Planning for Sport and Recreation)

## PLANNING POLICIES

16. The Development Plan comprises the East of England Plan, adopted 2008, saved policies in the Suffolk Structure Plan, adopted 2001, and the Babergh Local Plan (Alteration No. 2) adopted 2006. The following policies are relevant to this proposal:-

### East of England Plan (EEP) 2008

- ENV7** (Quality in the Built Environment)  
**SS1** (Achieving Sustainable Development)  
**ENV6** (Historic Environment)

### Babergh Local Plan (Alteration No.2) 2006

- **CN01** (Maintaining Local Distinctiveness)
- **TP15** (Parking)
- **CR04** (Special Landscape Areas)
- **RE01** (Sports Facilities)
- **CR07** (Landscaping)

**The relevant documents can be viewed via the internet. Please see Page 4 for details.**

## CONSULTATIONS

17. TC – approval was recommended – voting was 8 for and 1 abstention.
18. Local Highway Authority – At the time of writing comments are being clarified.
19. Environment Agency – No objection but offered advice on sustainable drainage systems in relation to surface run off.
20. The County Archaeological Service – There are no grounds to consider refusing this application on archaeological grounds or to achieve preservation in situ. Any permission that might be granted should be subject to a PPG16, Para 30, condition to ensure that an adequate record is made of any archaeological features or finds which would otherwise be destroyed by the development.

21. BDC Countryside and Landscape Officer – Recommends refusal, comments are discussed in more detail below.
22. BDC Environmental Protection Team – No objection but due to the proximity to residential units and lack of information conditions should be added with regards to no events being allowed which would involve amplified music or speech, and no external lighting should be permitted without details first being submitted and agreed.

## **REPRESENTATIONS**

23. Four letters of support have been received from members of the bowls club raising the following points:-
  - The current facilities need up grading and the proposal is supported by the bowls club membership

## **PLANNING CONSIDERATIONS**

24. The issues to be considered in relation to this application are:-
  - The principle and sustainability of the development
  - The impact on the countryside and Special Landscape Area
  - The design and scale of the building
  - Impact on neighbour amenity
  - Traffic and Highways

### **Background**

25. No pre application discussions took place prior to the submission of application B/09/00001; therefore Officers were unable to outline the concerns which were subsequently identified once the application was submitted. The concerns were so serious and fundamental that the application would have been recommended for refusal.
26. The Case Officer and Development Control Manager met with the applicants on the 17 April 2009 to go through the areas of concern. Following this meeting the application was withdrawn.
27. The main areas of concern discussed at the meeting were as follows:-
  - The principle of the scheme (inadequate justification for development in the countryside)
  - The adverse impact on the Special Landscape Area.
  - The adverse impact on nationally important archaeology
28. The current application was resubmitted on the 22<sup>nd</sup> May 2009. This is unfortunate as some of the issues above have not been addressed in the new submission. Officers are of the opinion that the application is premature. The application has been rushed in to meet the developers/bowls club's deadlines to get a new pitch sown with grass this year. The applicant's time scale has no bearing on the assessment of the scheme. It is significant however as it has meant that insufficient pre application discussion have taken place.

### **Principal of Development**

29. Planning Policy Guidance Note 17 is the national policy guidance on planning for open space, sport and recreation. The main points raised in the document which are relevant to this case are as follows:-

- In the foreword to the document it states that new sport and recreational facilities should be located where they are easily accessible by walking, cycling and public transport
  - Paragraph 13 states that exchanging existing sports sites for new sites can be acceptable. The new site should be at least as accessible to current and potential new users and at least of an equivalent size, usefulness, attractiveness and quality. There should also be an aim for quantitative improvements.
  - The general principles for new sports facilities are set out in Paragraph 20 which states that new facilities should be accessible by walking, cycling and public transport using brown field sites before considering green field sites
  - Para 26 refers to development in rural areas. Developments which will attract significant trips should be located in or on the edge of county towns. Developments will require special justification if they are located in open countryside.
  - All developments in rural areas should be sited with great care and sensitivity to its rural location.
30. PPG17 gives clear guidance. Sustainable locations which are well connected and accessible by a range of transport options should be considered first. If the proposed development is in a rural area it should be located in or on the edge of a county town. The site as proposed is not within or on the edge of the Built up Area Boundary of Hadleigh. The site is located in open countryside. For this reason special justification is required for the proposal as submitted, this is a test set out in PPG17.
31. Policy CR01 of the Local Plan supports this approach stating that development which is essential for appropriate outdoor recreation can be acceptable in principle. It is therefore necessary to demonstrate why the facility is essential.
32. A number of issues therefore need to be addressed:-
- Why is the current site no longer suitable?
  - Given its highly sustainable location can the existing site be upgraded, has this option been explored?
  - What is the special justification for the scheme?
  - Is the proposal essential, not just the overall scheme but the size of the club house, amount of parking etc...is the scheme and its component parts essential?
  - Why has the site in Stone Street been identified, what other sites were considered closer to the town and why were they discounted?
  - What benefits for Hadleigh are there in moving the existing facility out of the town?
33. The applicants have submitted almost no justification for the scheme. They have indicated that a feasibility study and an assessment of alternative sites was undertaken, neither of which have been submitted with the application. Officers saw a copy of the alternative site assessment in late April 2009 once application B/09/00001 had been withdrawn. This study was not robust. Potential alternative sites within or on the edge of the town had been discounted without robust justification. Furthermore the Bowls Club had voted to pursue the Stone Street site before Officers had the chance to comment on the alternative site assessment. The whole process was rushed.
34. There is no justification as to why the bowls club needs to double in size. Officers asked for data on membership levels to see if membership was falling or rising, this has not been forthcoming. A business plan showing that they anticipate the membership to grow would have been useful in demonstrating this.

35. The applicants have failed to justify why the current site can not be upgraded, why the site as proposed has been chosen or what the special justification is for developing in the countryside. Bowling is not, for example, a sport that needs a rural location.
36. Sport England have produced a guide (Making a Planning Application: A guide for sports clubs) to help Sports Clubs in making planning applications. In this guide its sets out the following:-
  - Its sets out a process for submitting a planning application. The first section of the guide is about how clubs should review their options and then prepare their case. Options that should be considered are improving existing facilities; consider sharing with other clubs and facilities, a trail of alternative sites and seeking examples of how other clubs have tackled the same problem. No evidence has been submitted that any of this has been done robustly.
  - The guide also states that there needs to be a demonstrable need for the facility. There is no evidence submitted that the bowls club needs to double in size. The guide reiterates the questions identified above, is this the best location? Will it impact on the landscape? Can parking be accommodated successfully? Is the design right for the location? How will new members be attracted to the club?
37. The Sports England guide recommends that the rational for the proposal should be identified and set out in a development/business plan. This has not been done.
38. The application therefore has no overriding justification. The proposal is contrary to PPG17 and Policy CR01 of the Local Plan.
39. A site swap as a concept may be acceptable, but a robust case needs to be put forward demonstrating that the location proposed is the most appropriate and that there is a clear demand and need for the facility.
40. Officers recognise that there may be some merit in relocating the bowls club. As it is, the proposal is unjustified and in the wrong location. Consequently, the principle of the development can not be supported.

#### **Location of the Development**

41. As stated above PPG17 (supported by PPS7, PPS1 and PPG13) gives clear guidance on the location of new sporting development. The development should be accessible by a range of modes such as walking, cycling and public transport. The site is not reasonably accessible by any of these modes.
42. The site is not a comfortable walking distance from the town (400m - 800m) and is located on the north side of a busy main road. It would be undesirable to encourage people to walk or cycle from Hadleigh to the site. The proposal is designed to accommodate for users personal cars. In fact there is nearly one space for each player member of the club (80 playing members with 73 parking spaces). There is no bus stop in the vicinity of the site either. Users of the site would likely be entirely reliant on their own private cars to access the site.
43. The site is in an inappropriate location for the use proposed. The proposal represents an unsustainable form of development contrary to national and local guidance. No evidence has been provided with the application that there are no alternative sites. Notwithstanding this, even if there were no alternative sites, careful consideration would have to be given to whether this site is acceptable in principle due to its remote location away from the town.

44. It also has to be noted that the existing facility is in a highly sustainable location in the town centre. There is no justification put forward to as to why this development should be allowed contrary to established guidance which states that rural location should be considered last in a sequential approach where town centres, edge of town centres and urban fringes are considered first. Potential alternative sites closer to the town centre have been identified in the alternative site assessment (not submitted with the application), but these have not been pursued robustly and there is no justification why.

#### **Impact on Special Landscape Area, Design, layout and Impact on Character**

45. The site is located within the Brett Valley Special Landscape Area. The site is located within the 'Rolling Valley Farmlands' landscape character type within the County Landscape Character Assessment. This landscape character type has the following relevant characteristics:-
- Gentle valley sides with some complex and steep slopes
  - Deep well drained loamy soils
  - Organic pattern of fields smaller than on the plateaux
  - Small ancient woodlands on the valley fringes
  - Sunken lanes
  - Towns and villages with distinctive medieval cores and late medieval churches
  - Large, often moated houses.
46. The Councils Landscape and Countryside Officer has assessed the scheme against the Landscape Character Assessment and is of the opinion that the proposal represents a significant, adverse impact on landscape character by virtue of its location, scale, form and design, and is unacceptable in this sensitive environment. Officers agree with this assessment.
47. The area of particular concern is the layout of the site; the car park is very large and is above the maximum standard in the Parking SPG. The site is laid out so that the car parking is all towards the front of the site adjacent to Stone Street dominating any views along Stone Street. This large car park in the middle of the countryside would be an incongruous, harmful addition and out of character with the rural context and the purpose of SLA delegation. The car parking will give the site a scale which is out of context with the small scale, intermit pattern of development along the river valley.
48. The proposal represents an intrusion into the countryside from most aspects as the site is generally open. The site is visible from the higher land to the south-west and as such the proposal would impact on a wider area.
49. Even if the principle of the development at this location was acceptable, the scheme as proposed is not. The building to the rear of the site with the high levels of parking to the front is not acceptable, being unduly intrusive in the countryside, jarring with the landscape and its special character identified in the Landscape Character Assessment. A better option could have been to locate the bowls club building at the front of the site with the bowls green in the centre and parking beyond this. Structural landscaping could be provided to soften the development. The building being at the front would screen the site and respect the pattern of development. However, as stated, the principle of developing this site is not supported.

50. The proposal is at odds with the grain of development along Stone Street. The buildings are generally tight to the edge of the road and of a traditional form. The building as proposed is unremarkable. The building is exactly the same as that withdrawn under B/09/00001, it has not been designed specially to fit the context of the site, but just rolled over from a previous scheme, further evidence that the whole application is rushed and premature. The context of Stone Street is very different to the area around Buy Rights. The building proposes the use of black boarding but it does not have a rural form due to the veranda. Its location in the centre of the site does not follow the pattern of development, where buildings relate to the road, framing the street scene.
51. The high levels of parking, which dominates the site, will give the impression of an over development. There is too much within the boundary of the site. A knock on effect of this is insufficient space for landscaping. The landscaping proposed would be insufficient, being only 1m in depth in some places and missing in others. Structural landscaping would be required. However it is not the right approach to try and hide something which is not appropriate in the first instance. Landscaping can only be conditioned for five years. The lack of suitable landscaping is contrary to Policy CR07.
52. The scheme would not enhance the area and will not maintain local distinctiveness. The proposal is therefore contrary to Policy CN01 of the Local Plan.
53. Policy CR04 states that development will only be permitted in SLA's where it maintains or enhances the special landscape qualities of the area, identified in the relevant landscape appraisal and is designed so as to be sited in harmony with the landscape. The proposal would not maintain or enhance the SLA and it would not sit in harmony. The site is too small for what is proposed and the design approach and layout is more befitting of an urban context than a rural setting.
54. Policy RE01 states that new sports facilities should have no adverse impact on landscape character or the environment. The principle of developing this site, the layout, the level and location of parking and the lack of landscaping results in harm to the countryside and Special Landscape Area, contrary to Policy RE01.

### **Highways and Parking**

55. As stated above, the parking provision is above the maximum set out in the Parking SPG. The bowls green will be divided into 8 lanes/rinks. There should be 1 cycle stand per rink/lane. There should be a maximum of 3 car parking spaces per lane. This gives a maximum of 24 spaces for the development.
56. The applicants have tried to justify a further 34 spaces by assessing the bar against the parking standards for a public house. The bar should be ancillary to the bowls club; therefore the maximum standard for an A4 use should not apply. If the bar is going to be open to the general public then the description of the development is incorrect. The 24 spaces should be sufficient for the number of lanes, and therefore the anticipated activity, proposed. Furthermore the applicants are proposing an additional 18 spaces as 'over flow'. There is simple no justification for this.
57. The parking provision is excessive; it is above the maximum standard. Applicants should be looking to provide parking below the maximum standard. The proposal goes against the principles set out in PPG13 and the Parking Standards SPG to limit reliance on the private car. The parking is harmful to the amenity of the area and is a symptom that the scheme is in the wrong location. The Local Highway Authority has been consulted for a view on this.

### **Impact on neighbour amenity**

58. There would be no direct conflict with residential amenity. Environmental Health Officers have recommended a number of conditions were the application to be approved.

### **Summary**

59. The proposed development is a departure from the local plan. The applicants have not provided a special justification for the proposal failing to meet the PPG17 test or justify a departure from the Local Plan. There is no evidence that the development is essential (contrary to Policy CR01), the location of the site and excessive parking is an unsustainable form of development (contrary to PPS1 and PPG13), the layout, lack of landscaping and excessive parking is harmful to the countryside and Special Landscape Area, it would also give the site a cramped over developed appearance (contrary to Policies CR01, CR04 and CN01 of the Local Plan). The proposal is contrary to the provisions of the development plan, and accordingly is recommended for refusal.

### **RECOMMENDATION**

Refuse planning permission for the following reasons:-

- (1) Lack of special justification for developing in the countryside or justification that the development, and its component parts are essential (contrary to PPG17 and Local Plan Policy CR01).
- (2) Excessive parking and unsustainable location (Contrary to PPS1, PPG17, PPS7 and PPG13).
- (3) Design and layout being an over development and harmful to the countryside street scene and character of the area (Contrary to PPS1, Local Plan Policies CN01 and EEP ENV7).
- (4) Harmful impact on the Special Landscape Area (Contrary to Local Plan Policies CR04 and CR07).