Matter Statement

Matter 4 Tourism Prepared on Behalf of Bentwaters Parks

July 2019
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1.0 Matter 4 Tourism

1.1 This Matter Statement responds to the Inspector’s questions on Matter 4, Tourism, on behalf of Bentwaters Parks Ltd. The company owns the significant majority of the Bentwaters site near Rendlesham. This site is some 390 hectares which includes commercial areas, areas used for TV and film production and agricultural businesses. As a result of its former military role, the site also contains a range of historic military assets and a cold war museum. The Bentwaters Parks site is shown edged red on the attached plan in Appendix 1. The Bentwaters site is within the Area of Outstanding Natural Beauty (AONB).

1.2 We objected to Policy SCLP6.3 Tourism Development within the AONB and Heritage Coast. Our area of concern is part B of the policy. This states that:

“Tourism development in the AONB, or its setting, and Heritage Coast will be supported where it is of an appropriate scale for its surroundings (10 pitches/units or fewer in relation to proposals for tourist accommodation).”

1.3 The policy is a general one that covers the whole of the AONB, however the example of the Bentwaters site is useful in order to illustrate why the policy needs to be given more flexibility. We agree that tourism development in the AONB should be of appropriate scale, however an absolute 10 pitch/unit limit is too inflexible and is unsound. On large previously developed sites like Bentwaters, or other well located sites, larger scale development could be accommodated without harm to the AONB. A more flexible policy would provide an opportunity to realise sustainable development and economic benefits provided by tourism in an area where the economy is heavily reliant on tourism.

1.4 The 10 home limit in Policy SCLP6.3 is the between the definitions of major and minor development. The National Planning Policy Framework (The Framework) states in paragraph 172 that great weight should be given to conserving and enhancing AONBs and that permission should be refused for major development except in exceptional circumstances. National policy does not prevent major development in AONB but controls it. The Local Plan tourism policy is more restrictive than national policy which is unjustified.
1.5 To allow more flexibility for development on sites in the AONB, the local plan policy SCLP6.3 should be amended to state that:

“...surroundings (10 pitches/units or fewer in relation to proposals for tourist accommodation) unless exceptional circumstances are proven to justify larger developments."

1.6 This would mean that the local policy met the requirements of national planning policy. If this change is not made, then the AONB would have greater restrictions on tourism development than are set out in national planning policy.

1.7 To give an example why there should be more flexibility in the policy, we demonstrate some of the characteristics of Bentwaters which illustrate how a larger tourism development could be accommodated. Bentwaters is near to Rendlesham which is a Key Service Centre and which has a range of facilities. Bentwaters is within sustainable transport reach of major tourist attractions such as the coast, Rendlesham Forest, the important Minsmere RSPB reserve, the internationally renowned concert hall at Snape Maltings and the towns of Aldeburgh and Woodbridge. There is a Cold War Museum at Bentwaters itself (which is mentioned in the Local Plan paragraph 12.433) and the ex-military buildings are of interest to many people.

1.8 The AONB in which Bentwaters is located is a major tourism location. As a large previously developed site, Bentwaters provides a location where tourism development, such as holiday homes, can be located within the AONB but where that development will have a far lower impact on the character of the AONB than almost anywhere else.

1.9 The 390 hectare Bentwaters site has recently seen the approval of major developments because of its unique characteristics. These include a film studio and commercial buildings.
1.10 The proposed holiday site could consist of groups of holiday lodges or cabins grouped around the former aircraft dispersal pads to the south west of Bentwaters.

1.11 The area where holiday homes could be located is known to the land owners as the South West Development Area. This is a name given to the area by the USAF who, prior to the end of the Cold War, had plans to erect many more of the site’s hardened aircraft hangars in this area, grouped around each pad along with operational buildings. Access to the holiday site would be via a southern entrance which leads to the public highway and to Butley and Wantisden.

1.12 The development of holiday cabins grouped around the former dispersal pads and accessed via the internal road system would be very self-contained in terms of landscape and noise impacts and would offer a ‘holiday in the woods’ type of experience. The cabins would have access to Rendlesham Forest which is a popular tourist area currently providing opportunities for walking, cycling and camping.
1.13 This site offers the opportunity to allocate land for extensive holiday accommodation in the AONB with relatively little impact. Something which would be very difficult to achieve elsewhere in the area. Finding sites for holiday accommodation in the AONB, with the extent of pre-existing services which this site offers, is very difficult. This is the principle benefit that this site offers. This, in turn, would increase tourism and thereby support local facilities and services in the area.

1.14 The Framework’s economic policies, and local examples such as Bentwaters therefore provide support for the amendment that we propose to the draft planning policy.
Appendix 1 Site Ownership Plan