

PLANNING STATEMENT

REGENERATION AND REPLACEMENT OF EXISTING FOOD AND BEVERAGE AND GOLF COURSE
FACILITIES

AT

AXE CLIFF GOLF COURSE

Squire's Lane
Seaton Down
Seaton
EX12 4AB

Prepared for
Dr R Loveridge

Dated May 2022



Stags Planning Services
21 Southernhay West
Exeter
Devon EX1 1PR
01392 439046 / planning@stags.co.uk

Contents

1.0	Introduction	Page 1
2.0	Site Location and Description	Page 3
3.0	The Proposal	Page 5
4.0	Relevant Planning History	Page 7
5.0	The Development Plan	Page 8
6.0	Material Considerations	Page 12
7.0	Development Considerations	Page 14
8.0	Planning Balance and Conclusions	Page 21

REGENERATION AND REPLACEMENT OF EXISTING FOOD AND BEVERAGE AND GOLF COURSE FACILITIES

PLANNING STATEMENT

1.0 INTRODUCTION

- 1.1 This statement has been prepared by Stags on behalf of Dr R Loveridge. The statement relates to the main clubhouse site at, Axe Cliff Golf Course, Seaton and it has been prepared to support an application to replace the existing tired facilities at the main clubhouse site to provide infrastructure that better meets the needs of the golf course users and the public. The proposals will also facilitate the provision of overnight accommodation for visitors to the course. The main clubhouse site currently comprises a range of buildings and hardstanding which have been developed over time. As with many cases where growth has occurred organically the layout of the site has been compromised and there is also no one coherent architectural style and the building stock is of no particular design merit.
- 1.2 This statement provides an assessment of the proposals against the relevant planning policy framework. The statement focusses on the provisions of the Town and Country Planning Act 1990, which requires that decisions to be made in accordance with the Development Plan unless material considerations indicate otherwise. Such material considerations include the National Planning Policy Framework and National Planning Practice Guidance.
- 1.3 Axe Cliff Golf Course forms part of Axe Cliff Farms & Estates which comprise 242 acres of coastal land abutting the Bindon Estate and extends to 146 acres of arable and pasture land and circa 14 acres of woodland and the golf course which extends to 82 acres. Axe Cliff Golf Course is an historic 18 hole golf course which was first built as 9-hole course 1894 and then extended under the supervision of renowned golfer and course designer James Braid in 1929. The present 18-hole course has a length of 5,969 yards, par 70 and is well known for its scenic location and challenging holes and is a well established regional golfing 'landmark'. The South West Coast Path (SWCP) passes through the course and as a whole the SWCP draws 8.6 million visitors every year (source www.southwestcoastpath.co.uk), at present the Golf Course only partly harnesses this

passing pedestrian traffic and it is believed there is significant opportunity to deliver additional facilities which will directly benefit the Golf Course and visitors to the area.

- 1.4 The existing golf course club main site buildings are located off a private road at the top of Squires Lane. As outlined the buildings have been developed over time and are of no architectural merit. Whilst the buildings and facilities remain in a useable condition they are now somewhat tired internally and externally and need replacing in order for the golf club to survive and hopefully thrive.
- 1.5 The statement should be read in conjunction with the other supporting information submitted with the planning application.

2.0 SITE LOCATION AND DESCRIPTION

2.1 Axe Cliff Golf Course is located on the eastern side of the River Axe estuary, east of Seaton, Devon circa 0.5 miles from the centre of the town. The golf course lies within the East Devon Area of Outstanding Natural Beauty and adjacent to the Jurassic Coast World Heritage site.

2.2 The clubhouse site acts as the 'main gateway' to the course and lies at the head of a private road which leads from the top of Squires Lane. The site is adjacent to a public bridleway which forms part of the South West Coast Path. The site sits within an existing fold in the landscape which naturally confines the site which is also partly surrounded by existing established woodland. The site falls from circa 71m AOD on the eastern side to circa 60m to the west.

2.3 The site as a whole comprises of a range of buildings of varying ages all of which have little or no architectural merit. There is also an associated parking area to the west of the buildings and there are other smaller service areas in and around the buildings. The site provides the following uses over the range of buildings and hardstanding areas:

- Golf course club house rooms
- Bar, restaurant and function space catering for both golf course members and the public
- Unrestricted residential dwelling
- Retail shop
- Car parking for 50 cars
- Ancillary golf course facilities (changing room, store etc)

2.4 The site is largely surrounded by the golf course and established woodland but to the west lie a range of residential properties which were once a coastguard station. Whilst detached from the edge of Seaton by the River Axe estuary the site is very close to the settlement and in particular the forthcoming development at Seaton Quay. Seaton can be reached from the site in circa 10 minutes and by largely by walking off road.

2.4 Prior to 1894 and based on historic cartographic data the site was undeveloped and it was not until 1904 mapping that a 'pavilion' is shown adjacent to the then newly

established golf course. Since then the site has been added to and redeveloped a number of times.

2.5 The site lies within the East Devon Area of Outstanding Natural Beauty and adjacent to areas defined as Ancient semi-natural woodland. It is however not subject to any other statutory designations although the boundary of the Jurassic Coast World Heritage Site is in reasonably close proximity (circa 275m south). The site falls within an area locally designated as 'Undeveloped Coast'. There are no designated heritage assets directly adjacent to the site but the Grade 2 Listed Haven Cliff House, lies circa 250m to the south west. However, due to the topography and established vegetation there is little or no intervisibility between there and the application site.

2.6 The Local Planning Authority is East Devon District Council and the site is within Axmouth parish.

3.0 THE PROPOSAL

3.1 This application seeks approval for demolition of the main clubhouse building and the wider regeneration and remodelling of the site to provide the following facilities:

- Golf course club rooms and overnight accommodation
- Bar, restaurant and function space catering for both golf course members and the public
- Car parking 4 cars (disabled persons sized spaces) with other existing parking being maintained which will be remodelled as previously approved
- Ancillary golf course facilities
- Soft and hard landscaping

3.2 The proposals will mirror the current planning uses on site (E (b) and F2 (c)) which are in existence with the addition of accommodation falling under C1.

3.3 The proposed site layout is split into lower and upper sites with a series of terraces that align with the levels of the site slope. The access to the site is directly from Squire's Lane and runs along the north side of the site. There are three types of buildings on the site:

1. The lower golf entrance buildings
2. The upper club house building with terraces, restaurant/bar
3. The overnight accommodation

3.4 Materials will all be drawn from reference points in the local area and will reflect this character and respect the undeveloped fringes of the site.

3.5 It is considered that the proposals represent a significant opportunity to improve the visual appearance of this part of the site, in particular through replacement of a range of buildings which have little or no architectural merit and have been built up over time with no coherent style. These buildings will be replaced with a range of structures of a high quality design that reflect the character of the area and make best use of the site having been designed as a cohesive entity.

3.6 Squires Lane and the private road to the golf course has recently been resurfaced at the expense of the applicant and provides good access to the site. Existing car parking provision will be maintained in terms of the number of spaces but the new car park will have a far better layout making it more usable. It is noted that this car parking provision was capable of meeting the golf course at a time when the club had over 400 members rather than the circa 150 it presently has and that the site has always served the public as well as members. The site is also readily accessible from Seaton and the wider area by a range of sustainable means of transport.

4.0 RELEVANT PLANNING HISTORY

4.1 The planning history relating to the site is as follows:

- Extension to existing club house to provide additional seating and new toilets – 79/C0795 (Approved)
- Extension to existing clubhouse to provide additional seating and new toilets – 80/C0439 (Approval with conditions)
 - Condition (a) time limit
 - Condition (b) removing permission 79/C0795 upon implementation
- Replacement of Changing Rooms for Block Construction – 89/P0765 (Approved)
 - Stewards Bungalow – 90/P1700 (Approval with conditions)
 - Condition (a) time limit
 - Condition (b) surface water disposal
 - Condition (c) foul drainage
 - Condition (d) materials
 - Replacement Steward's Accommodation – 92/P0650 (Approval with conditions)
 - Condition (a) time limit
 - Condition (b) alternative development to that permitted 90/P1700
 - Condition (c) materials
 - Condition (d) drainage
- Conservatory extension to clubhouse, internal alterations, construction of decking terrace & entrance porch – 05/0296/FUL (Approval with conditions)
 - Condition 1. Time limit
 - Condition 2. Materials
- Erection of dining room extension and construction of decking terrace and entrance porch – 09/2567/FUL (Approval with conditions)
- Revisions to 09/2567/FUL to widen decking to allow seating over and storage area under – 12/1696/FUL (Approval with conditions)
 - Condition 1. Time limit
 - Condition 2. Approved plans

4.2 The Council provided pre-application feedback in respect of these proposals in 2020 and the comments and observations made have been considered as part of the evolution of the design.

5.0 THE DEVELOPMENT PLAN

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the provisions of the Development Plan (DP) unless material considerations indicate to the contrary.

5.2 In this case, the DP comprises the East Devon District Council Local Plan 2013-2031.

5.3 Emerging plans have the status of material considerations, the weight to be attached to them dependent upon the stage of their preparation.

5.4 Material considerations include amongst other matters the National Planning Policy Framework (the Framework).

5.5 East Devon Local Plan 2013-2031

5.5.1 The East Devon Local Plan (2013-2031) contains a number of policies relevant to this proposal.

5.5.2 **Strategy 3 - Sustainable Development** confirms that:

“The objective of ensuring sustainable development is central to our thinking. We interpret sustainable development in East Devon to mean that the following issues and their interrelationships are taken fully into account when considering development:

a) Conserving and Enhancing the Environment - which includes ensuring development is undertaken in a way that minimises harm and enhances biodiversity and the quality and character of the landscape. This includes reducing the risk of flooding by incorporating measures such as sustainable drainage systems. Developers should maximise the proportion of their developments that take place on previously developed land

b) Prudent natural resource use - which includes minimising fossil fuel use therefore reducing carbon dioxide emissions. It also includes minimising resource consumption, reusing materials and recycling. Renewable energy development will be encouraged

c) Promoting social wellbeing - which includes providing facilities to meet people's needs such as health care, affordable housing, recreation space and village halls.

d) Encouraging sustainable economic development - which includes securing jobs.

e) Taking a long term view of our actions - Ensuring that future generations live in a high quality environment where jobs, facilities, education and training are readily available.”

5.5.3 **Strategy 7– Development in the Countryside** states as follows:

“The countryside is defined as all those parts of the plan area that are outside the Built-up Area Boundaries and outside of site specific allocations shown on the Proposals Map. Development in the countryside will only be permitted where it is in accordance with a specific Local or Neighbourhood Plan policy that explicitly permits such development and where it would not harm the distinctive landscape, amenity and environmental qualities within which it is located, including:

- 1. Land form and patterns of settlement.*
- 2. Important natural and manmade features which contribute to the local landscape character, including topography, traditional field boundaries, areas of importance for nature conservation and rural buildings.*
- 3. The adverse disruption of a view from a public place which forms part of the distinctive character of the area or otherwise causes significant visual intrusions.”*

5.5.4 **Strategy 33 - Promotion of Tourism in East Devon** sets out that:

“The Council will support and facilitate high quality tourism in East Devon that promotes a year-round industry that is responsive to changing visitor demands. Tourism growth should be sustainable and should not damage the natural assets of the District but aim to attract new tourism related businesses that can complement the high quality environment of East Devon.”

5.5.6 **Policy RC4 - Recreation Facilities in the Countryside and on the Coast** states that:

*“**Planning permission will be granted for outdoor recreation facilities in the countryside and on the coast** provided that the nature of the activities undertaken or the space requirements of the proposal require a countryside or coastal location and:*

- 1. The facilities or development proposals are in scale with the character, environmental characteristics and setting of the area and do not conflict with countryside, nature or landscape policies, nor detract from the amenities of the area.*
- 2. The proposals allow for safe access and discreet parking arrangements, particularly in environmentally sensitive areas, and do not result in the loss of or cause unacceptable disruption to existing public rights of way.*
- 3. On site facilities should be appropriate to meet the needs of the proposal and links with adjacent footpaths and bridleways should be suited to any proposed site uses.*

Where indoor areas are required use should be made of existing buildings. Any new buildings and necessary extensions should be limited in scale and be in close proximity to existing groups of buildings or an existing settlement. Where it is proposed to extend or intensify an existing use the cumulative effect of the use will be considered in the interests of the character of the area.”

(own bold)

5.5.7 **Policy E4 - Rural Diversification**

“Proposals to diversify and expand upon the range of traditional agricultural related economic activities undertaken in rural areas will be permitted where a proposal meets the following criteria in full:

1. *The proposal is complementary to, or compatible with, the agricultural operations in the rural area or on a farm and is operated as part of an overall holding.*
2. *The character, scale and location of a proposal are compatible with its landscape setting and any area of nature conservation importance.*
3. *The proposal would not use the best and most versatile agricultural land.*
4. *The likely amount of traffic generated by the proposal could be accommodated on the local highway network without harming road safety and without adverse visual impact upon the surrounding countryside.*
5. *Any new building (and associated parking and other structures/storage) does not detract from the historic environment is modest in scale and is sited in or adjacent to an existing group of buildings and is of a compatible design and will blend into the landscape in terms of design, siting and materials.*
6. *The proposal would not cause noise, air or water pollution or flooding nor harm the amenity of local residents.*
7. *All new agricultural and agricultural related buildings within 1 kilometre of sighting of barn owls or signs of their activity with a ridge height of 3 metres or more shall make suitable provision for the nesting of barn owls, whether or not they have been observed at the site."*

5.5.8 E5 - Small Scale Economic Development in Rural Areas

"In villages and rural areas small scale economic development (not including retail use classes/other uses in Classes A1 – A4) and expansion of existing businesses designed to provide jobs for local people will be permitted where:

1. *It involves the conversion of existing buildings. Or*
2. *If new buildings are involved, it is on previously developed land. Or*
3. *If on a Greenfield site, shall be well related in scale and form and in sustainability terms to the village and surrounding areas.*

Provided that the following criteria are met: a safe highway access, the local highway network is capable of accommodating the forecast increase in traffic established by a Traffic Assessment, no detrimental impact upon the amenities of neighbouring properties, wildlife, landscape or historic interests. All new buildings shall be designed to blend into their location and shall meet sustainable construction and on site renewable energy production. In order to ensure that land is retained for the benefit of the local economy, permitted development rights allowing changes to alternative uses will be withdrawn."

5.5.9 Strategy 46 - Landscape Conservation and Enhancement and AONBs sets out the wider approach to all development within the AONB and states:

"Development will need to be undertaken in a manner that is sympathetic to, and helps conserve and enhance the quality and local distinctiveness of, the natural and historic landscape character of East Devon, in particular in Areas of Outstanding Natural Beauty.

Development will only be permitted where it:

1. **conserves and enhances the landscape character of the area;**
2. *does not undermine landscape quality; and*
3. *is appropriate to the **economic, social and well being of the area.***

When considering development in or affecting AONBs, great weight will be given to conserving and enhancing their natural beauty and major development will only be permitted where it can be shown that it cannot be reasonably accommodated elsewhere outside of the AONB.

The current Area of Outstanding Natural Beauty Management Plans, the East Devon and Blackdown Hills Areas of Outstanding Natural Beauty and East Devon District Landscape Character Assessment & Management Guidelines 2008 and the Devon County Council Landscape Character Areas Assessment should be used in design and management considerations."

(own bold)

- 5.5.10 **Strategy 44 - Undeveloped Coast and Coastal Preservation Area** provides further policy direction on development within areas designated as being Undeveloped Coast and states:

"Land around the coast and estuaries of East Devon, as identified on the Proposals Map, is designated as a Coastal Preservation Area. Development or any change of use will not be allowed if it would damage the undeveloped/open status of the designated area or where visually connected to any adjoining areas. The coastal Preservation Area is defined on the basis of visual openness and views to and from the sea."

- 5.5.11 **TC4 - Footpaths, Bridleways and Cycleways**

"Development proposals will be required to include measures to provide, improve and extend facilities for pedestrians and cyclists commensurate with the scale of the proposal. Footways and routes for pedestrians and cyclists within and through new development schemes will be encouraged. These measures may include both shared and exclusive surfaces to provide safe, convenient and attractive routes, and must be designed to take account of the needs of persons with restricted mobility. Wherever possible the opportunity should be taken to join, upgrade and extend existing or proposed networks.

Development which would result in the loss, or reduce the convenience or attractiveness of an existing or proposed footpath, cycleway or bridleway, will not be permitted unless an acceptable alternative route is provided."

(own bold)

6.0 MATERIAL CONSIDERATIONS

6.1 National Planning Policy Framework (2019)

6.1.1 The current version of the Framework was first published in July 2021. The document sets out the Government's planning principles and policies for England and how these are expected to be applied. Annex 3 of the NPPF sets out a schedule of those policy documents replaced by the framework. This includes all Planning Policy Statements and Planning Policy Guidance Notes.

6.1.3. The Framework's message is clear in that it provides a clear "*presumption in favour of sustainable development*" (paragraph 10).

6.1.4 Dealing with economic development in rural areas **Paragraph 84** states:

"Planning policies and decisions should enable:

a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;

b) the development and diversification of agricultural and other land-based rural businesses;

c) sustainable rural tourism and leisure developments which respect the character of the countryside;"

6.1.5 **Paragraph 85** goes on to state that:

*"Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). **The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.**"*

6.1.6 **Paragraph 176** addresses protected landscapes and states:

"Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas."

6.2 Other Material Considerations

6.1.2 The NPPF states that weight can also be accorded to the provisions of emerging plans, the more advanced the emerging plan the greater the weight that can be accorded to it. At present the New East Devon Local Plan is at a very early stage of preparation and no draft policies have been published and therefore it can be afforded no weight.

6.1.3 The East Devon AONB 'Partnership Plan' (formerly the 'Management Plan') contains a number of overarching objectives which are relevant to development in the AONB. These objectives largely focus on delivering management of the AONB in partnership with others but the Plan also contains its own specific policies including the following dealing with tourism and associated activities.

"ART 1 In partnership with others encourage and support the provision of high quality, sensitive, physical access for as wide a range of users as possible and the on-going sustainable development of key recreational routes where this does not conflict with the conservation of internationally protected sites and species.

ART 2 In partnership with others encourage and support sustainable tourism activities within the AONB through the promotion of the special qualities of the AONB, where this would not lead to conflict with the conservation of internationally protected sites and species."

6.3 Alternatives and Case Law

6.3.1 The status of a 'fall-back' development as a material consideration in a planning decision is not a new concept and one of the material considerations is what the alternative is for the site in question. When the development is contrary to policy, the question of what else can be done with the land without the need for further planning permission is of paramount importance

6.3.2 In this case it is plain that there are a range of uses on the site which are already well established and that provide a 'baseline' against which these proposals should be considered against.

7.0 DEVELOPMENT CONSIDERATIONS

7.1 Principle of Development

- 7.1.1 It is recognised that where a case proposes a number of uses it will engage some different and some identical parts of the Development Plan and that due to likely complexity of the considerations there may be some 'tension' between policies. It has been well established that Development Plan Policies can 'pull in different directions' and that a decision maker is required to assess the proposal against the potentially competing policies and then "decide whether in the light of the whole plan the proposal does or does not accord with" (City of Edinburgh Council v SOS for Scotland -1997).
- 7.1.3 In respect of the golf club facilities there is direct support set out in Policy RC4 for facilities that support outdoor recreation. This policy does not specify what exact form such development should take and it is clear that as a whole these proposals will support the continued operation of the golf course.
- 7.1.4 As identified the proposals seek to introduce an overnight accommodation element to the site to seek to make sure the food and beverage offering is fully utilised. It is noted that Policy E16 relating to new holiday accommodation does not explicitly support new accommodation in the countryside but nor does it preclude it. It is furthermore noted that serviced accommodation in particular is a driver of economic development and generates jobs both directly and indirectly and that serviced holiday accommodation is not explicitly excluded from the economic development supported by Policy EC6. It is also considered that the other relevant branches set out within Policy EC6 are fully met by these proposals.
- 7.1.5 We also contend that that the Council should consider the fact that the golf course as a whole is a diversification activity of a farming enterprise run by Axe Cliff Farms & Estates and that Policy E4 provides support for a wide range of activities provided they do not conflict with farming operations. In this case the actual physical proposals will be a very small component of the overall holding and as they are well within the confines of the long established golf course there will be no negative impact on farming operations and the use is wholly compatible with the farming enterprise.
- 7.1.6 With regard to the retail and food and beverage element it is considered that the overarching support for recreation facilities provides would cover these elements of the development given the clear functional link to the golf course, albeit the facilities will be open to the public as they are already. We would also draw attention to the

considerations set out at point 7.1.4 and hold that these also stand in terms of this element of the proposals.

7.1.7 Weight should also be given to the economic benefits of the proposals which will not only stem from the act of construction but in the longer term from the operation of the site. These benefits will come in the form of the direct employment of additional staff and spending by the operator to run the site and also indirectly through associated spending in the wider area by visitors drawn to the facility.

7.1.8 Whilst we hold that these proposals accord with the Development Plan when read as a whole we would also draw attention to the fact that the proposed development nearly wholly relates to the replacement of existing facilities. These existing uses are not restricted to serving golf course visitors only or tied to the course in any other way. It is also the case that the existing facilities are located in a range of buildings that are now quite tired and not suitable for securing the long term future of the course. Furthermore, the current building stock on the site has no architectural merit or design quality and its replacement with a range of buildings of a far higher quality design is a significant betterment of these proposals.

7.2 Ecology

7.2.1 The application site is within an area of land that is already developed and within a wider area actively managed for golfing use. However, it is clear that as the site is flanked by woodland and there are a range of existing structures the site could have some ecological potential and an assessment has been carried out by Ecologic.

7.2.2 The combined survey results confirm the use of some of the buildings on the site by roosting bats consisting of the following:

Building 1 – Changing Room Building

- Common pipistrelle – summer day roost (non-maternity), utilised by moderate numbers (peak count: 4).

Building 2 – Dwelling

- Pipistrelle species – summer day roost (non-maternity), utilised infrequently.

7.2.3 With regard to nesting birds only Buildings 5 – Golf Buggy Shed showed the presence of nesting birds and included a former sparrow nest. The habitats surrounding the car park are suitable to support nesting and foraging birds.

7.2.4 Overall, the site provides only limited habitat for protected species by virtue of its developed nature and active use. Mitigation and enhancement measures are set out in the Ecologic report and on the planning drawings and these will ensure there are no long term ecological impacts.

7.2.3 The proposals also include additional planting and soft landscaping measures which will also help to deliver a biodiversity net gain and these are set out in detail in the planting strategy.

7.3 Landscape

7.3.1 The site is situated within the East Devon Area of Outstanding Natural Beauty and therefore it is clearly within a sensitive location. On this basis a Landscape and Visual Impact Appraisal has been carried out by Redbay Design to assess the potential impacts of the development in landscape and visual impact terms, with specific regard to any key viewpoints and also in terms of more generalised landscape and visual effects.

7.3.2 With regard to landscape effects the Redbay assessment concludes that:

“The proposals comprise moderate landscape enhancements integral to the development that will improve landscape character over the current situation across the site.”

In relation to both specific and broader visual effects the report states that:

“There is a single location that has been judged to experience a Slight adverse impact; users of the SWCP at the site (VP03). This is a result of the extent that views of the proposals could be obtained and the close proximity. However, this is not the most sensitive Location where valued views are not gained.

It is considered that the site and the study area can accommodate the proposed development without significant effects to the landscape character of visual amenity.”

7.3.3 On this basis it is considered that the development is acceptable in landscape terms.

7.3.5 It is also clear that as these proposals relate to improvements to an existing developed site and one which is discrete in the landscape and largely confined by well-established development and landscaping features therefore there will be no impact on the openness of the Undeveloped Coast and the proposals satisfy Strategy 44 in this regard.

7.4 Design

7.4.1 The proposed redevelopment maintains largely the same existing uses in the same locations and positions on site but they are replaced and reconfigured to allow the development to make better and more efficient use of the site.

7.4.2 The Design and Access Statement submitted with the application sets out further detail on the design approach taken. However, it is considered the approach taken is acceptable in the context of the location and will deliver a significant betterment over the current position.

7.5 Highways and Public Rights of Way

7.5.1 The application site is already accessed by service vehicles associated with the use and day to day functioning of Axe Cliff Golf Course by golf club members, the public and staff. The intended functioning of the new facilities will nearly wholly mirror those already on site.

7.5.2 However, it is accepted there will be some change to vehicular movements across the site and this is considered within the Transport Note provided by Vectos.

7.5.3 The Vectos report recognises that the site is highly accessible by foot from Seaton town centre and therefore any additional travel demand generated by the development are likely to be by foot. Overall, the report concludes that the proposals are not expected to generate any greater traffic than the maximum potential that could already be achieved. Any additional demand beyond this is expected to be by foot, either attracting further use of the south west coast path or by local residents and visitors to Seaton. This should be considered to be a significant benefit of the site and development proposals, with associated and significant social, economic and environmental benefits. Therefore, the development proposals are considered acceptable in transport terms, and accord with paragraphs 110 and 111 of the NPPF (2021).

7.5.4 With regard to the requirements of Policy TC4 it is considered that the proposal will not result in any increase in traffic movements over the SWCP/Bidleway and these could occur in any event without further planning permission being required. Furthermore, by virtue of the improvement works to the surfacing already carried out and the parking improvements being delivered there will be no loss of convenience or attractiveness.

7.5.5 The development will also provide enhanced food and drink facilities on a popular section of the SWCP which is for many either the start of a long journey or the end. This will

further increase the appeal of this section of the path and help meet management objectives to promote its use.

7.6 Arboriculture

7.6.1 The site lies adjacent to areas of established woodland and a tree protection and a Tree Survey of this area has been carried out by Aspect Tree Consultancy. The associated Arboricultural Impact Assessment concludes the works will only result in the loss of a small tree group of very low quality (Cat C) and further confirms that there will be no direct impacts on public amenity and impacts on visual amenities will be minimal. A Tree Protection Plan also accompanies the submission and confirms how protection measures can be put in place to ensure the act of construction does not damage existing trees.

7.6.2 There is scope for additional tree planning within the site and the detailed landscaping plan provided by Redbay Design proposes the planting of a number of trees, in addition to other landscaping measures. This additional planting will deliver an improvement over and above the existing baseline and will more than offset the small tree loss of trees that will result from the development.

7.7 Drainage

7.7.1 The site already comprises of significant areas of hardstanding and other impermeable surfaces and whilst there are no known significant drainage issues. It is intended that some of the existing drainage arrangements will be retained for the redevelopment.

7.7.2 The application proposes to use soakaways to deal with surface water runoff, though further testing will be required at the detailed engineering design stage. If considered necessary, the applicant is willing to agree to a condition requiring detailed drainage design to be submitted to and agreed with the Council before work is commenced on this element of the development.

7.7.3 With regard to the foul drainage the site is already served by a suitably sized private foul drainage system, for which there is EA consent, and as the development will not result in any significant increase in flows from the development this will continue to serve the site.

7.8 Demolition and Construction Impacts

7.8.1 The applicant is mindful that the site lies in fairly close proximity to third party residential properties and the access to the site is also part of the SWCP. The applicant is committed

to minimising disruption and impacts during the demolition and construction phases and is willing to commission a Demolition and Construction Management Plan, which can be addressed by way of a planning condition.

7.8.2 It is envisaged any such plan would limit construction working hours to the following:

“The site working hours will be Monday to Friday 0800 to 1800 hours and Saturday 0800 to 1300 hours.

All noisy work will only be undertaken during the prescribed noisy hours of work, which is between 0800 to 1000 hours, 1200 to 1400 hours and 1600 to 1800 hours Monday to Friday and 0800 to 1300 hours on Saturday.”

7.8.3 It is considered that with these measures in place there will be no significant impacts generated by the demolition and construction phase of the development.

8.0 STAKEHOLDER CONSULTATION

8.1 A range of stakeholder consultation has been undertaken with regard to this site by the Applicant and the project team and this is as set out as follows:

Neighbouring land owners

- Presentation circulated June 2020
- Stakeholder involvement in access way re-surfacing

Axe Cliff Golf Course

- Extensive consultation
- October 2019 AGM presentation
- Presentation circulated June 2020
- Stakeholder involvement in access way re-surfacing
- Concessionary rent
- Axe Cliff Golf Course Regeneration Presentation - August 2021

Axe Cliff Golf Club members

- October 2019 AGM presentation
- Suggestions collated 2020
- Presentation circulated June 2020
- Axe Cliff Golf Course Regeneration Presentation - August 2021

Coast guard cottages

- October 2019 AGM presentation
- Suggestions collated 2020
- Presentation circulated June 2020

Devon County Highways

- Authorisation for access way re-surfacing obtained

Parish

- Presentation circulated June 2020
- Axe Cliff Golf Course Regeneration Presentation - August 2021

8.2 The opinions expressed and comments received through the above measures have been considered by the applicant and the project team in preparing the application. On this basis it is considered the application has sought, where possible and relevant to planning, to reflect the input from the various stakeholders engaged with.

9.0 PLANNING BALANCE AND CONCLUSION

9.1 Policy Compliance

9.1.1 In all regards it is considered that the proposals are compliant with Development Plan Policy when considered as a whole and relevant guidance.

9.2 Benefits

9.2.1 The scheme will secure the significant improvement to an existing developed site.

9.2.2 As set out in detail within this planning statement, it is the contention of the applicant that the development of the site in question would not give rise to any significant adverse impacts, environmental or otherwise.

9.3 Conclusion

9.3.1 For the reasons outlined in this report it is respectfully requested that full planning permission be granted.