

Planning Statement

Full planning application seeking the reinstatement of a site from equestrian use to agricultural use, demolition of a stable building and erection of an agricultural barn to support a rural business on land to the south west of Fairview Cottage, Circular Road, Baylham, Ipswich, Suffolk, IP6 8LE



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Table of Contents

Introduction	4
Location & Site Description	4
Planning history.....	5
The proposal	6
National planning policies	7
Local planning policies	7
Planning in principle	8
Development in the countryside	8
Character and appearance	9
Residential amenities.....	11
Access and parking.....	12
Environmental considerations.....	13
Landscape	13
Land contamination	14
Renewables and waste	15
Biodiversity	15
Flood risk.....	16
Sustainable development	16
Economic	16
Social	17
Environmental	17
Summary	18
Appendices.....	19

Introduction

Planning Direct has been instructed by the applicant, Mr Ed Meredith, to prepare and submit a full planning application for a change of use of an equestrian site back to an agricultural class use and the erection of an agricultural barn to support a rural business.

It is considered that the proposed development should be assessed favourably by the LPA as it is fully compliant with national and local planning policies.

The Planning Statement should be read in conjunction with the submitted plans and identifies how the proposed development is considered to be compliant with relevant policies within the Mid Suffolk Local Plan, Mid Suffolk Core Strategy and the provisions of the National Planning Policy Framework.

Location & Site Description

The application site is identified within the red line boundary of the Site Location Plan at **Appendix 1** and comprises a stable building constructed pursuant to application DC/19/00028. The lawful class use of the application site is equestrian use.

The applicant also owns the field identified within the blue line boundary, which was not subject to application DC/19/00028 and is subsequently retained for agricultural use.

The application site is located at the top of a small valley that rolls down towards the village of Baylam to the north before rising up again. It is observed that the rear gardens of Upper Street in Baylam look across and up the valley to the site.

The site lies within a Special Landscape Area (SLA) and is within the designated countryside in accordance with the LPA's proposals maps

According to the ALC East Region map downloaded from the Natural England website at **Appendix 2**, the application site is classified as Grade 3 land as is therefore considered to be of 'good to moderate' quality.

Vehicular access to the site is already established from Circular Road with a gated entrance set back approximately 7m from the edge of the highway and there is sufficient space within the site for vehicles to turn.

Fairview Cottage and Tea Pot Hall are located to the north east of the site, an existing orchard with an agricultural barn is immediately adjacent to the south west, and Walnut Barn and Walnut Tree Farm House are located further to the south west but accessed from the opposite of Circular Road.

Although the current use class of the application site is 'equestrian' there has been insufficient demand for stables within the area and the existing building has largely been vacant ever since it was constructed.

Planning history

The following planning history of the site has been extracted from the LPA's online public access system.

Ref: DC19/00028

Type: Full planning application

Site: Land South West of Fairview Cottage, Circular Road, Baylham, Ipswich Suffolk IP6 8LE

Description: Change of Use of land and erection of 3No Stables

Outcome: Approved 02 April 2019 and implemented

The following planning application relating to the erection of an agricultural barn on the adjacent orchard site to the south west is also considered to be relevant.

Ref: DC/18/04402

Type: Full planning application

Site: Land North East Of Walnut Tree Farm, Circular Road, Baylham, Ipswich Suffolk IP6 8LE

Description: Erection of an agricultural storage building and the creation of hard standing with associated access, landscaping and ancillary works.

Outcome: Approved 31 January 2019 and being implemented

The proposal

The applicant, Ed Meredith, is self employed and has successfully run companies within the leisure and hospitality sectors during the last 33 years. Due to the impact of the Covid-19 pandemic on the aforementioned sectors and the UK's departure from the European Union the applicant has re-evaluated his career path. It is considered that there will be a surge in demand for locally grown produce as a consequence of Brexit, which has resulted in an opportunity for the agricultural sector.

The applicant is proposing to change the use of land within the red line boundary from equestrian back to agricultural, to support a high yield modern farming business which would facilitate growing produce in a sustainable environment.

The applicant is proposing to demolish the existing stable building and erect an agricultural building and lean-to greenhouse in accordance with the Proposed Site Plan, and Proposed Elevations/Floor/Roof Plan included at **Appendix 3** and **Appendix 4** respectively. The intention of the applicant is to use the building to grow mushrooms, micro greens, dry and process crops, and store flower petals for natural confetti. It would be possible to achieve the aforementioned process within containers, however it is considered that a barn would be more fit for purpose and less visually intrusive.

Natural confetti is a recent innovation at weddings and is made from freeze-dried flower petals which are completely biodegradable. A significant number of wedding venues now require that only biodegradable versions are used.

Both externally and within the lean-to greenhouse the applicant intends to utilise the site to grow organic vegetables, natural confetti and fruit (to include apple trees). In addition the building would provide a secure space for a vehicle and tool storage in association with the activities to be undertaken on the site.

The intention is to run the business 'off grid' by harvesting rainwater and utilising energy from solar panels which will be installed on the roof of the proposed building. By virtue of growing mushrooms and micro greens together, the gases expelled by the mushrooms can support the micro greens. Furthermore the waste product from both operations can be composted by a worm farm, which will result in the creation of new compost material which can be recycled. Other forms of agricultural waste can be added to the worm farm.

An assessment of the proposals in the context of national and local planning policies is set out within the remainder of this planning statement.

National planning policies

The National Planning Policy Framework (NPPF) published in February 2019 sets out the Government's planning policies for England and how these should be applied. The following paragraphs with the Framework are considered to be the most relevant in relation to this application.

Section 2 - Achieving sustainable development

Section 5 - Delivering a sufficient supply of homes

Section 9 - Promoting sustainable transport

Section 14 - Meeting the Challenge of Climate Change, Flooding and Coastal Change

Section 15 - Conserving and enhancing the natural environment

Section 16 - Conserving and enhancing the historic environment

Local planning policies

The following policies within the Mid Suffolk Local Plan (1998) and Core Strategy (2008) are considered to be the most relevant to the planning application herewith.

CL8 Protecting wildlife habitats

CL13 Siting and design of agricultural buildings

CL14 Use of materials for agricultural buildings and structures

CS2 Development in the Countryside and Countryside Villages

CS5 Mid Suffolk's Environment

E10 New Industrial and commercial development in the countryside

FC1 Presumption In Favour Of Sustainable Development

FC1.1 Mid Suffolk Approach To Delivering Sustainable Development

GP1 Design and layout of development

H16 Protecting existing residential amenity

SB3 Retaining visually important open spaces

Planning in principle

This section of the statement sets out to demonstrate that the principle of the proposed development in context of national and local planning policies is established. It is considered that the proposal represents sustainable development in accordance with the NPPF and should be assessed favourably by the LPA. The proposed development would support the rural economy, make effective use of quality agricultural land and would not result in a detrimental impact upon the character and appearance of the area.

Development in the countryside

Policy CS2 sets out the LPA's approach to development within the countryside and identifies agriculture as an acceptable category of development, subject to accordance with other Core Strategy policies.

Policy CS1 which sets out the LPA's settlement hierarchy identifies that development within the countryside will be restricted to particular types that support the rural economy, meet affordable housing, community needs and provide renewable energy. Furthermore, paragraph 83 of the NPPF (2018) provides that planning decisions should enable the sustainable growth and expansion of all types of business in rural areas, both through well designed new building in addition to the development and diversification of agricultural and other land based rural businesses.

The Local Plan recognises that agriculture performs a wide variety of roles besides food production. As a consequence some of the best and most versatile agricultural land is threatened by speculative development while diversification into non-agricultural activities has become vital for the survival of many farm enterprises. The applicant's intention is to return the site to agricultural use in order to support the growth of high yield crops inside the proposed building and outside. It is clear that the proposed development would support the rural economy by returning the site to its former use and by producing locally grown produce.

The Agricultural Land Classification (ALC) system classifies agricultural land as falling within five grades. Land within grades 1, 2 and 3a are considered to be *Excellent*, *Very Good* and *Good* quality agricultural land respectively. According to the ALC East Region map downloaded from the Natural England website at **Appendix 1**, the application site is classified as Grade 3a land and is therefore considered to be *'good to moderate*.

Natural England describes Grade 2 land as follows:

'Land with minor limitations which affect crop yield, cultivations or harvesting. A wide range of agricultural and horticultural crops can usually be grown. On some land in the grade there may be reduced flexibility due to difficulties with the production of the more demanding crops, such as winter harvested vegetables and arable root crops. The level of yield is generally high but may be lower or more variable than grade 1.'

It is duly considered that the return of the land to agricultural use should be supported by the LPA as it would expand the volume of high quality land used for this purpose within the district. It is clear that most of the outside crops would be grown on land within the blue line boundary which was not subject to the change of use to equestrian activities under application DC19/00028. As a consequence the larger field is still classified as agricultural land in planning terms and can be used to grow crops, however the proposed development within the red line boundary is required to manage and support the existing class use of the field which not been farmed for some considerable time.

Policy EN10 provides that new commercial development in the countryside should not be permitted unless there is a need for it to be located away from towns and villages. Due to the agricultural nature of the rural based business proposed, the location within the countryside is completely appropriate.

Character and appearance

Paragraph 170 of the NPPF provides that planning decisions should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland. Policy GP1 provides the the design and layout of new development should maintain or enhance the character and appearance

of its surroundings.

Policy CL13 provides that where a new agricultural building is proposed it should normally be sited within or adjacent to existing farm buildings and be sympathetically related to them in style and use of building materials. It is observed that the site is located immediately adjacent to an orchard to the south west, within which an agricultural barn has been erected pursuant to application DC/18/04402. The proposed development is duly considered to be sympathetic to its surroundings, due its proximity to the adjacent barn and by virtue of an existing building already in situ.

Policy SB3 provides that the LPA will seek to retain visually important open spaces. It should be recognised that the proposed building would replace the equestrian building currently positioned on the site, although it is noted that the size and design of the structure would be more akin to the neighbouring barn to the south west. Due to the fact that an existing building has already been erected at this location and no open space exists, it is considered that policy SB03 is irrelevant to the application and cannot be applied to the proposed development.

Policy CL14 provides that the colour, texture and use of materials should be carefully selected to be sympathetic to its setting and light coloured, highly reflective surfaces should be avoided. Policy GP1 also provides that materials and finishes should be compatible with the surrounding area and respect the local vernacular.

It is considered that the proposed building would benefit from an agricultural appearance avoiding the use of bright colours which would be out of character with its rural surroundings and the Special Landscape Area (SLA). and the choice of external materials can be appropriately conditioned by the LPA.

Although it is proposed that solar panels would be installed to the roof, these would be fixed to the south eastern elevation of the building which would not be visible from the village of Baylham to the north. As a consequence the proposed development would safeguard the views of the SLA, whilst benefitting from introducing renewable energy provision to the site.

The Core Strategy notes there is a limited supply of Previously Developed Land due to the rural nature of the district. It is recognised that it is essential that development makes most efficient use of land (especially Previously Developed Land) in sustainable locations to help minimise loss of undeveloped land.

The Glossary of the NPPF provides a national definition for Previously Developed Land which is set out below:

'Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.'

It is clear that the application site is classified as 'Previously Developed Land' as the area of the site within which the building would be positioned comprises a stable building, and equestrian activity is not considered to be an agricultural use class. As a consequence the proposed development would make effective use of a brownfield site, which is fully supported by national and local planning policies.

Residential amenities

Policy H16 serves to protect the amenities of neighbouring residents. The LPA provides that development will be refused which would materially reduce the amenity and privacy of adjacent dwellings in respect to appearance, traffic generation, nuisance or safety. Although the policy specifically relates to protecting the existing character and amenity of primarily residential areas, the applicant has nevertheless considered the amenities of the closest residents to the site.

The nearest dwellings to the site on the same side of Circular Road are identified as Fairview Cottage and Teapot Hall which lie to the north east are also accessed from aforementioned road. It is considered that the significant distance which lies between the site and the two dwellings ensures that no detrimental impact would be caused in relation to outlook, overlooking, privacy and loss of natural light. Further residential dwellings known as Walnut Barn and Walnut Tree Farm House are also located to the

south west on the opposite side of Circular Road, but again due to the distance between the site and these buildings no discernible impact has been identified.

It is also observed that in relation to the erection of the stable building under DC19/00028, the LPA considered there to be no impact upon the amenities of local residents. The relevant Officers Report at **Appendix 5** stated '*This proposal would not have an undue harmful impact on any neighbour amenity, as the proposal will not have an impact on levels of light or overlooking received by neighbours due to the large separation distance from neighbouring properties.*'

The applicant is committed to ensuring no burning of waste shall take place on site in order to further safeguard local amenity.

It is reiterated that the proposed development would not result in a detrimental impact upon neighbouring amenities by virtue of its distance from residential dwellings and natural screening along the site boundary adjacent to the highway.

Access and parking

Paragraph 109 of the NPPF provides 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. Similarly policy T9 serves to ensure that highway matters are fully assessed in regard to proposed new developments. Policy GP1 provides that new development should make proper provision for parking and turning of vehicles.

No alterations are proposed in relation to the access point into the site. The site is served by an established vehicular access with a gated entrance set back approximately 7m from the edge of the highway providing sufficient space for vehicles to enter and exit the site safely. It is considered that the existing access would satisfactorily serve the proposed development and there would continue to be sufficient room for vehicles to manoeuvre within the site and park.

The applicant has confirmed that the business would only support one or two employees including himself, and as a consequence there would be a limited volume of traffic movements generated by the activities. Due to the lack of intensification of

activities on the site the proposed development would not result in an unacceptable impact upon the capacity of the surrounding road network.

It has been recognised by the LPA in relation to previous applications that although the lane is narrow, passing areas exist to include field entrances and a large area of hardstanding between the junction with the B113 and the site entrance. The vehicular access to the application site is also considered to constitute a passing point.

It is confirmed that the size of the proposed business would be directly comparable with the scale of activities that have previously been accepted by the LPA in relation to the equestrian use class, and no significant intensification is due to take place.

Environmental considerations

Section 15 of the NPPF provides that planning decisions should contribute to and enhance the natural and local environment and several factors should be considered which relate to safeguarding the landscape, protecting biodiversity and ensuring development does not contribute to unacceptable health risks to the public (in relation to contamination, air quality, noise pollution or land instability). This section of the statement provides an assessment of the proposed development against the aforementioned factors. Policy CS5 is also concerned with safeguarding Mid Suffolk's Environment at a local level.

Landscape

Policy CS5 provides that the LPA will protect and conserve landscape qualities taking into account the natural environment and the historical dimension of the landscape as a whole rather than concentrating solely on selected areas, and encourage development that is consistent with conserving its overall character.

It is recognised that the site falls within the Rolling Valley Farmland Special Landscape Area (SLA), and is typified by sloping valley sides with good arable soil. A few parcels of ancient woodland are in existence on the upper valley slopes. Prominent views of historic landmarks such as St Peters Church can be viewed from the application site. The LPA considers this historic landscape to be a heritage asset in its own right within the Joint Babergh and Mid Suffolk District Council Landscape Guidance (August 2015).

Policy CL2 provides that proposed development within the SLA should be sensitively designed in relation to layout, materials used and landscaping features.

It should firstly be recognised that the proposed development would not result in the removal of any trees or hedgerows from the site.

As referred to earlier within this statement a stable building is already sited at the position within the site where the new building will be erected, and was constructed pursuant to application DC/19/00028. The potential impact upon the landscape caused by the erection of a replacement building, although larger, is mitigated by virtue of the site being previously developed and an existing building already in place.

The applicant is committed to ensuring that the external appearance of the new building would avoid the use of bright colours and traditional materials would be utilised in order to respect the rural character of the area. It is considered that similar materials would be used to the neighbouring barn directly to the south west, which were deemed to be acceptable by the LPA under application DC/18/04402. The applicant is willing to consider the final choice of externally facing materials selected in full consultation with the LPA prior to the application being determined.

The introduction of solar panels to the south eastern elevation would not result in an adverse impact upon the views of the SLA, as this side of the building would be hidden from the views of the landscape from the village to the north.

The applicant notes that a five-year Landscape and Maintenance Plan was submitted and approved under application DC19/00028 and is included at **Appendix 6**. The applicant is committed to ensuring that the provisions contained within this document are renewed under this application, and would be pleased to consider any potential enhancements that are identified through the planning process.

There will be no means of external lighting introduced to the site as a consequence of this application, in order to safeguard against the potential impact of night time illumination on the character of the area and biodiversity.

Land contamination

The proposed use (agricultural) is not considered to be a vulnerable use class in relation to the potential impact of land contamination. As a consequence it is not considered necessary to submit a desk top land contamination report in support of the application. Furthermore it is observed that a land contamination assessment was not required by the LPA in relation to application DC/19/00028.

Renewables and waste

The applicant's intention to run the business 'off grid' by harvesting rainwater and utilising energy from solar panels, which will ensure that the activities undertaken on the site are sustainable. The applicant is also committed to recycling byproducts as gases expelled by the mushrooms can support micro greens and the introduction of a worm farm would create compost from waste products.

Biodiversity

Paragraph 174 of the NPPF provides that planning decisions should seek to protect and enhance biodiversity. Similarly local policy CL8 is concerned with protecting wildlife habitats.

It is considered that the application would introduce net biodiversity gains to the site.

The natural confetti to be grown outside would include flowers such as delphiniums and cornflowers. The flowers tend to be beautiful in terms of appearance and are a high quality haven for wildlife including bees. In addition the following measures would be undertaken by the applicant:

- 1) Construction work would be undertaken in accordance with BS 5837:2012 in order to protect any existing trees and their root protection areas where appropriate
- 2) One standalone and one integrated bat box to the proposed building or a tree within the site will be installed
- 3) One integrated swift box and one small bird box will be installed to the proposed building or a tree within the site; and
- 4) The renewal of the five-year Landscape and Maintenance Plan approved under application DC/19/00028 would be agreed by the applicant.

Flood risk

The application site is within Flood Zone 1 according to the Environment Agency's online flood mapping database, which represents the lowest probability of a flood risk event occurring. It is therefore not considered to be necessary to submit a Flood Risk Assessment in support of the application, given the low risk of the site and the fact that the application is not classified as a Major Development.

It is observed that issues arising from surface water drainage resulting from new development are dealt with under the provisions of Building Regulations (Part H). Notwithstanding this prior to the commencement of any works to the access, details shall be submitted to and approved in writing by the LPA showing the means to prevent the discharge of surface water from the development onto the highway.

Sustainable development

The sustainability of the proposed development is assessed against the three objectives of sustainability as set out within paragraph 8 of the NPPF (economic, social and environmental) within this section of the planning statement, although many of the points identified below have been examined in detail elsewhere.

Local policies FC1 and FC1.1 set out the LPAs commitment and approach to approving sustainable development within the district.

Economic

The economic objective is to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.

Paragraph 83 of the NPPF specifically supports a prosperous rural economy through provisions to include the development of agricultural businesses, and it is particularly important to ensure that the best and most versatile agricultural land within the district is utilised. Paragraph 117 of the NPPF provides that planning decisions should provide an

effective use of land in meeting need for homes and 'other uses'. It is clear that the proposed development is compliant with the aforementioned provisions as it would result in good quality agricultural land being returned to its former use, during a period when the total amount of farmland within the district has been in decline.

It is observed that the proposed development would be in an appropriate rural location and the approval of the application would result in the commencement of a business which is both innovative and highly productive, given the high yield which can be achieved by the modern methods of farming to be undertaken.

Social

The social objective is to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.

The social benefits to be provided by the proposed development are limited, however only a small scale enterprise is considered to be appropriate at this location given the size of the site, nearby development and the rural context of the area. It is considered that the social objective is however achieved as the proposed development would help to create a small rural business which could result in an employment opportunity for a local person and thus provide a benefit to the rural community commensurate to the size of the site.

Environmental

The environmental objective is to contribute to protecting and enhancing the natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

The proposed development would make effective use of Previously Developed Land as supported by national and local planning policies, which is a strong preference to building on green field sites. It is considered that the proposed design and appearance

of the building would respond positively to the SLA and its rural surroundings. The barn would be positioned within the same build line as the agricultural barn to the south west on the adjacent site and would comprise a similar design. The externally facing materials would be selected in order to ensure that the barn blends into the landscape, through the use of traditional products which are common place in rural areas.

A five-year Landscape and Maintenance Plan has been submitted to accompany the application in order to ensure the LPA is still able to control the visual impact of the site from surrounding land and to safeguard the integrity of the SLA. The plan is identical to that submitted under application DC/19/00028.

It is not considered necessary to submit a LVIA in support of the application, as this document was not required by the LPA under application DC/19/00028 which granted planning consent for the erection of a stable block at the same location.

The applicant has identified net gains for biodiversity and no trees or hedgerows would be removed to accommodate the proposed development.

Summary

It is the professional opinion of Planning Direct that the proposed development should be approved in accordance with the submitted plans as it is considered to be compliant with national and local planning policies.

The proposed development would provide an agricultural barn on Previously Developed Land, to support a new and modern agricultural business that would provide benefits to the rural economy and make best use of good quality agricultural land.

The proposed development would not result in a detrimental impact upon the SLA and net gains for biodiversity would be secured.

The activities to be undertaken on the site would not result in a harmful impact upon neighbouring amenities or the safety of the highway.

It is considered that the proposal constitutes sustainable development as defined within the NPPF as it provides economic, social and environmental benefits to the district. The

proposal will also serve to enhance and maintain the vitality of rural communities in accordance with the NPPF.

The applicant expects the LPA to bring any potential issues arising with the proposal to the attention of Planning Direct at the earliest opportunity, in order that clarifications can be provided and/or solutions agreed where appropriate.

Appendices

Appendix 1 Site Location Plan

Appendix 2 ALC East Region Map

Appendix 3 Proposed Site Plan

Appendix 4 Proposed Elevations/Floor/Roof Plan

Appendix 5 Officers Report DC19/00028

Appendix 6 Five-year Landscape and Maintenance Plan