



## SUPPORTING STATEMENT

In respect of an application for the conversion and alteration of existing building to form a detached dwelling at;

Battle's Barn, Little London, Combs,  
Stowmarket, IP14 2ES

## CONTENTS

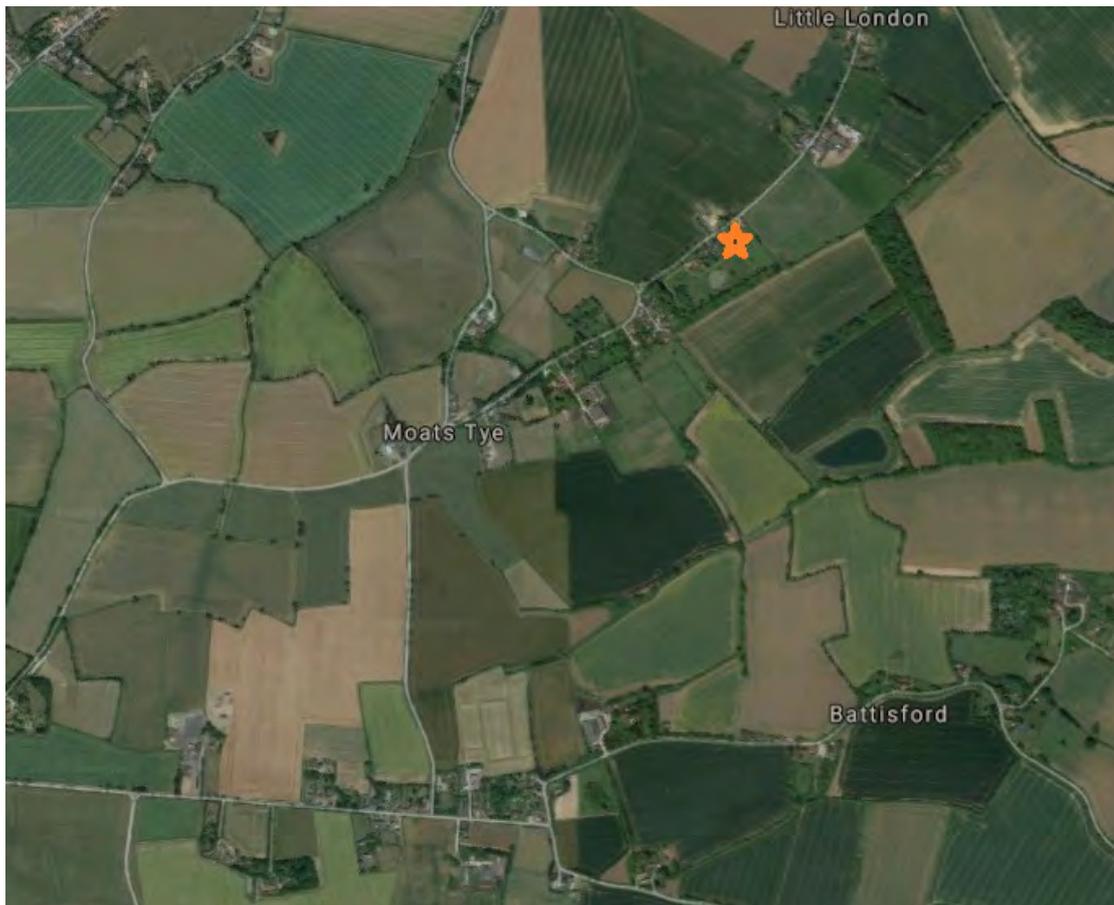
|            |                                  |           |
|------------|----------------------------------|-----------|
| <b>1.0</b> | <b>Introduction</b>              | <b>3</b>  |
| <b>2.0</b> | <b>The Site</b>                  | <b>4</b>  |
| <b>3.0</b> | <b>The Proposal</b>              | <b>4</b>  |
| <b>4.0</b> | <b>Planning Policy</b>           | <b>5</b>  |
| <b>5.0</b> | <b>Relevant Planning History</b> | <b>6</b>  |
| <b>6.0</b> | <b>Planning Considerations</b>   | <b>6</b>  |
| <b>7.0</b> | <b>Planning Balance</b>          | <b>17</b> |

## 1.0 Introduction

1.1 This statement is prepared in support of an application for the conversion and alteration of an existing building at Battle's Barn, Little London, Combs to a residential dwelling.

1.2 It will consider the planning policy position and provide an overview of the relevant material considerations relating to the proposed development.

1.3 The extract below shows the location of the site relative to nearby development.



1.4 The building that is the subject of this proposal was granted planning permission in 2018 under application reference DC/18/03215 and has recently been erected. This recent planning history will be considered in detail wherever relevant throughout this statement.

## 2.0 The Site

2.1 The site lies to the south side of Badley Road and lies between, and opposite, existing residential dwellings.

2.2 Within the previous application made on this site, the Council identified the site as being;

*“The site is agricultural land to the North East, South East and South West of two detached dwellings and one under construction respectively at the centre of a cluster of dwellings. The dwelling to the south west is Grade 2 Listed”.*

2.3 The building that stands on the site was constructed in 2019 for the storage of vehicles, timber and equipment. It is sited towards the centre of the plot of land in which it is sited with access provided to Badley Road towards the western end of the site frontage. The building has an unrestricted B8 use with no restriction as to the hours of use or the level of vehicular activity that can occur at the site.

2.4 The site is unconstrained by any landscape designations and is not within a conservation area.

2.5 The site lies wholly in Flood Zone 1 and is therefore not at risk of flooding.

### **3.0 The Proposal**

3.1 The proposal is to convert the building into a single residential dwelling.

3.2 In respect of the building itself, new window openings are proposed to provide light and outlook to the newly formed rooms. A first floor is proposed to be inserted offering access to three bedrooms at that level.

3.3 At ground floor level, a kitchen and separate living room would be delivered at each end of the building with a WC and study also. Bifold doors are proposed from the kitchen out into the garden area.

- 3.4 A wildflower meadow is also proposed to be provided as part of the proposal. This would be sited to the rear of the dwelling and would provide a biodiversity benefit, bringing insects, reptiles and birds onto the site.
- 3.5 The building would also be provided with solar pv panels to the rear roofslope which, coupled with sustainable construction methods and low energy goods within the dwelling, would provide an energy efficient property also.

#### **4.0 Planning Policy**

- 4.1 The revised National Planning Policy Framework was published in February 2019. It sets out the Government's planning policy and is a material consideration when determining planning applications.
- 4.2 The NPPF is supported by the Planning Practice Guidance (PPG), which assists applicants and decision makers in interpretation the NPPF.
- 4.3 The development plan for Mid Suffolk District Council consists of the saved policies of the Mid Suffolk Local Plan (1998), the Core Strategy (2008) and its Focussed Review (2012). The following policies within these documents are considered to be relevant to this proposal.

#### **Mid Suffolk Core Strategy and the Core Strategy Focused Review**

- FC1 - Presumption in Favour of Sustainable Development
- FC1.1 - Mid Suffolk Approach to Delivering Sustainable Development
- CS1 - Settlement Hierarchy
- CS2 - Development in the Countryside and Countryside Villages
- CS5 - Mid Suffolk's Environment

#### **Mid Suffolk Local Plan 1998**

- GP1 - Design and Layout of Development
- H9 - Conversion of Rural Buildings to Dwellings
- H13 - Design and Layout of Housing Development
- H15 - Development to Reflect Local Characteristics
- H16 - Protecting Existing Residential Amenity
- HB1 - Protection of Historic Buildings
- SB2 - Development Appropriate to its Setting
- T10 - Highway Considerations in Development

4.4 These policies will be referred to throughout this statement wherever relevant to this proposal.

## **5.0 Relevant Planning History**

5.1 As detailed above, the building that is the subject of this application was approved in 2018 with the conditions of that permission being duly discharged by application in 2019.

5.2 There is no other recent planning history directly relevant to this site.

## **6.0 Planning Considerations**

6.1 Paragraph 10 of the Revised NPPF states *“So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development”*.

6.2 Whilst the site lies in the countryside for the purposes of planning policy, Paragraph 79 of the NPPF identifies that;

*“Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:*

*a) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;*

- b) the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;*
- c) the development would re-use redundant or disused buildings and enhance its immediate setting;*
- d) the development would involve the subdivision of an existing residential dwelling; or*
- e) the design is of exceptional quality, in that it:*
  - is truly outstanding or innovative, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and*
  - would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area.”*

6.3 There is, therefore, in-principle support for the re-use of rural buildings in the countryside for housing, such that this proposal would meet the aims of the NPPF in this regard.

6.4 This provision is also repeated at the local level, where saved policy H9 of the Local Plan states;

*“In the countryside, the conversion and change of use of agricultural and other rural buildings whose form, bulk and general design are in keeping with their surroundings, will be favourably considered, subject to the following criteria:-*

- the proposed conversion must respect the structure, form and character of the original building and retain any important architectural features. Existing openings should be utilised wherever practicable and new openings kept to a minimum;*

- where proposed extensions are essential they should not dominate the original building in either scale, use of materials or situation. Proposed extensions should not detract from the appearance or character which warrants the original building being retained as a feature in the countryside. Domestic features, such as porches and chimney stacks, unrelated to the traditional appearance of the building will be considered inappropriate. The creation of a residential curtilage around a newly converted building should not impose adversely on the character of the surrounding countryside;*

- the extent to which any residential conversion detracts from the original character of the building or its rural surroundings will be treated as a material consideration. In order to*

*protect the character and appearance of the converted building or the amenity and appearance of the surrounding countryside the district planning authority may impose conditions removing permitted development rights under the general permitted development order 1995”.*

- 6.5 This policy sets out some detailed criteria by which a proposal such as this should be considered, and it is noted that in recent commentary pertaining to proposals made under policy H9 that the Council found that;

*“Moreover, the principle of development can fall on policy H9 of the Mid Suffolk Local plan. Policy H9 allows for the conversion of agricultural or rural buildings into dwellings subject to criteria. In this case it is reasonable to suggest that agricultural and/or rural, by definition are likely to be in unsustainable locations.*

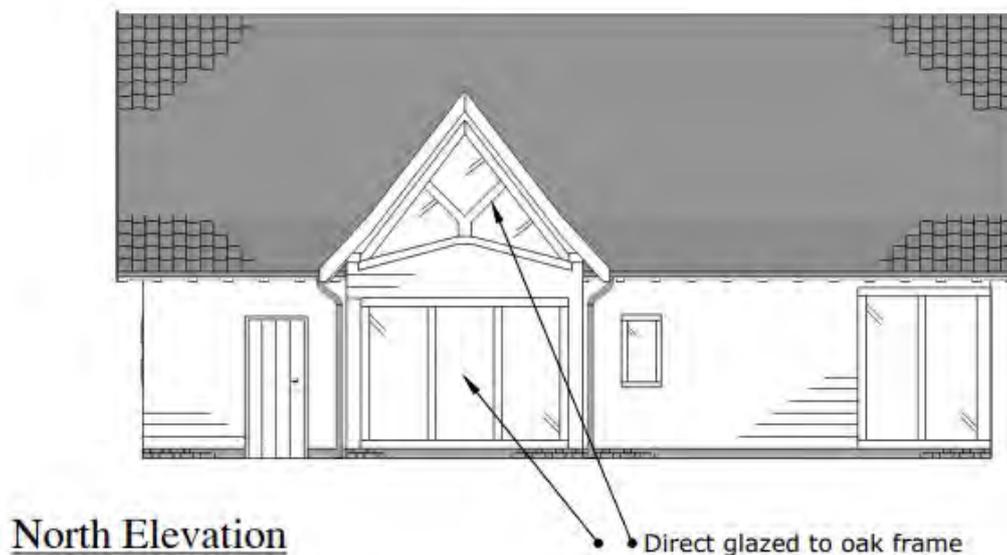
*This policy is not considered out of date as it promotes making effective use of land as set out by the NPPF in paragraphs 117 and 118”.*

- 6.6 This policy can, therefore, be relied upon as a valid and up-to-date policy that holds significant weight in the decision-making process.
- 6.7 In light of the above, what follows is an assessment of the criteria within policy H9 carried out in direct consideration of the proposed development.

#### Design and Layout

- 6.8 It is clear that the provisions of policy H9 relate heavily to the impact of a conversion on the existing building in terms of the scale, form and character of the proposal relative to the existing structure.
- 6.9 The proposal retains the scale and form of the existing building, utilising the existing structure and providing a dwelling that is wholly characteristic of the existing building. The proposal would utilise good quality materials that would compliment the existing building and would provide a new dwelling that would read as a converted barn. Indeed, in respect of the external aspects of the building, the proposal would retain the finishes that were approved in the recent permission for the building.

- 6.10 The extract below is taken from the proposed elevations, and shows how the new dwelling would appear from the road.



- 6.11 As can be seen, the resultant dwelling is a simple but attractive property, that is of low scale and, thereby, low impact. The new windows and door openings are of a scale and form that do add some domestication to the building but do not alter the recognition of this building as a converted rural building. The finished appearance would, therefore, be entirely appropriate to the countryside location in which it is located, particularly given the character and finishes of the existing building.
- 6.12 Internally, the proposal provides living space to one end of the building with a kitchen to the opposite end. A modest study and bathroom are proposed at ground floor also, with bedrooms located to either end of the building at first floor. A family bathroom is also proposed at first floor level.
- 6.13 Parking is proposed adjacent to the access road and a good sized garden would be provided adjacent to the property also. A wildflower meadow is also proposed to the rear of the property.
- 6.14 The 1:500 block plan that accompanies the application shows the extent of landscaping around the newly formed property, and the separation which exists to both adjacent properties.

- 6.15 For all of these reasons, the proposal demonstrates an attention to detail and a design approach that ensures that the proposed works are compliant with policies H9 and GP01.

#### Highway Safety

- 6.16 The building is currently served from an access that adjoins Badley Road in the western corner of the site. As detailed above, the building has an unrestricted B8 use which would enable the use to occur throughout the day and night and with no restriction on the level of vehicular activity that can occur at the site. The level of activity resulting from this proposal would be significantly less than that which has already been approved here.
- 6.17 According to [www.crashmap.co.uk](http://www.crashmap.co.uk), there have been no recorded accidents in the immediate vicinity of the site identifying that the existing access does not give rise to highway safety concerns. The continued use of this access onto this lightly trafficked road would not, therefore, give rise to any particular highway safety issues.
- 6.18 The proposal is, therefore, in accordance with the provisions of paragraph 108 of the NPPF, which identifies that in assessing specific applications for development it should be ensured that safe and suitable access can be achieved for all users.

#### Land Contamination

- 6.19 Submitted with this application is a Homecheck Environmental report and the Council's land contamination questionnaire which demonstrate that the land is not known to be, or likely to be, contaminated.
- 6.20 The proposal is therefore in accordance with paragraph 178 of the NPPF which states that planning policies and decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.

### Biodiversity and Ecology

- 6.21 The application is for the conversion of an existing building that has only recently been erected. It is supported by a Preliminary Ecological Appraisal prepared by Greenlight Environmental Consultancy which addresses the ecological aspects of this proposal and its impacts.
- 6.22 It concludes that, subject to compliance with the recommendations that it makes, that there are no ecological aspects of this proposal that would be harmful and, thereby, no justifiable reason for refusing this proposal on such grounds.

### Residential Amenity

- 6.23 The proposed residential use will secure the use of this site as a residential dwelling in an existing residential cluster. The location of the building within its plot will ensure that the use would not impact on any adjoining properties in a harmful manner.
- 6.24 As detailed, the existing use has the potential to be vastly more intensive than the proposed one. The site currently has a B8 use with no restriction over levels of activity or times of operation. The proposed use would be significantly more appropriate for this rural residential setting
- 6.25 Furthermore, future occupants will have access to sizeable and private amenity space adjacent to the new dwelling, thereby ensuring good levels of amenity for future occupants.

### Heritage Impacts

- 6.26 The Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty on local planning authorities to have special regard to the desirability of preserving listed buildings and their settings (Sections 16 and 66).
- 6.27 Section 16 of the NPPF sets out the Government's position on the conservation and enhancement of the historic environment. Paragraph 189 of the NPPF requires applicants to describe the impact of proposals on the significance of any heritage asset to a level of detail proportionate to the assets' importance. As set out above, this should be no more than is

sufficient to understand the potential of that impact on the significance. Paragraph 190 requires local planning authorities to identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

6.28 Paragraph 192 sets out that in determining planning applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness.

6.29 Paragraph 193 of the NPPF apportions great weight to a designated asset's conservation. The more important the asset, the greater the weight should be. The NPPF highlights that significance can be harmed or lost through physical change and any harm requires clear and convincing justification.

6.30 Paragraphs 195 and 196 address how local planning authorities should deal with situations where the assessment of impacts has identified harm to a heritage asset.

6.31 At the local level, Policy HB1 of the Mid Suffolk Local Plan 1998 document identifies that *"the district planning authority places a high priority on protecting the character and appearance of all buildings of architectural or historic interest. Particular attention will be given to protecting the settings of listed buildings"*.

6.32 These legislative and policy provisions thereby identify a need to assess the significance of the heritage asset in a proportionate manner, identify the impact of the proposed development on that significance, balance any harm arising against the public benefits and ensure that the special character of the building is preserved and, where possible, enhanced.

- 6.33 In dealing with the application that proposed the erection of the building on the site in 2018, the Heritage Officer identified that;

*“This application concerns the proposed development of a large timber framed barn with midstrey, on land adjacent to a Grade II Listed property, known in the NHLE as ‘House occupied by Mr E Battle’. Adjacent to that on the far side of the development site is a non-designated asset which appears to date from a similar period, but features a late extension. The issues of heritage concern therefore relate to the impact of the proposed development on the significance of both the designated and undesignated assets.*

*The proposed barn is of a traditional form. It is relatively large in comparison with the diminutive early modern thatched cottages, but it would not appear uncharacteristically long or tall. The materials proposed are suitable and its alignment continues the building line. Whilst there is undeniably an impact on the setting of the cottage, which extends at least to the field to the north east of it, and on the undesignated neighbour to the south west, that impact is considered acceptable. Note is made that solar panels are proposed on the rear slope of the roof. These are also acceptable.*

*In summary therefore, the proposed development would accord with s.66 of the P(LBCA)A1990 to preserve the building or its setting. It also accords with the requirements of the NPPF and the policies within the Local Plan – and as such the development is acceptable, subject to condition. (NB Note is made of open rafter feet, and that no rainwater goods are proposed.)”*

- 6.34 The applicant considers that there is no reason to take a contrary view in respect of the impacts of this proposal. The application for the barn did not relate to any use associated with either of the heritage assets adjacent, such that the land already has no relationship with these properties in terms of physical connection/ownership. Furthermore, the use of the land for residential purposes in an area that is already entirely domestic brings with it no particular change in the character of the area.
- 6.35 The new dwelling is sited towards the centre of its plot and would be supported by mature landscaping, new landscaping and a wildflower meadow. The external aspects of the site would be largely unchanged, with the building’s siting, scale and impact already existing.

- 6.36 The proposal would result in some domestication of the land. However, due to the screening that exists and the existing fragmentation of the site, this is not considered to cause harm to the adjacent heritage assets. As such, paragraphs 195 and 196 of the NPPF are not engaged.
- 6.37 It can be found, therefore, that the proposal would be acceptable in terms of its impacts on heritage assets and thereby compliant with policy HB1.

#### Flood Risk and Drainage

- 6.38 The site is not located in a vulnerable flood zone area, therefore the risks of flooding are considered to be low.
- 6.39 The applicant is fully aware of their obligation to comply with Part H (Drainage and Disposal) of the Building Regulations 2010, and there is nothing to suggest that the proposal would not be able to accommodate appropriate drainage on site.

#### Sustainable Development

- 6.40 Paragraph 8 of the NPPF outlines the three objectives of sustainable development that schemes should seek to deliver. The proposal carries the following sustainable benefits:
- 6.41 From the economic aspect, the proposal would generate a benefit for local trade before, during and after construction. Furthermore, there will be a positive benefit through support of local amenities, facilities and services available from future occupiers. The proposal can, therefore, be seen to be economically sustainable.
- 6.42 The social aspects of new housing are embedded in the NPPF which states that *“supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being”*.
- 6.43 Notwithstanding that a proposal in this location would contribute to enhancing and maintaining services in this village and neighbouring areas, including Combs, Needham Market and Stowmarket, the PPG advises that *“all settlements can play a role in delivering sustainable development in rural areas”*, cross-referencing to NPPF 79, *“and so blanket*

*policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided...".* Moreover, in rural areas, where public transport is limited, people may have to travel by car to a village or town to access services. At paragraph 103 of the NPPF, it identifies that *"The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making".* The general policy in favour of locating development where travel is minimised, and use of public transport is maximised, has to be sufficiently flexible to take account of the differences between urban and rural areas.

- 6.44 Furthermore, the delivery of a new dwelling to the market would help to meet housing need in the locality, and would help to boost the supply of housing required by the NPPF. Therefore, it is considered that the proposal meets the social objective of sustainable development. Furthermore, the proposal's contribution to the Council's housing supply should not be underestimated. The applicants intend to carry out the development in a short timescale should permission be granted. In this regard, the site should be considered deliverable in the terms set out in the NPPF and should thereby be afforded further weight in terms of its sustainability credentials.
- 6.45 With regards to the environmental elements of the development, the proposal would make reuse of an existing building in a sustainable manner. Good quality materials and finishes are proposed, and the development will include the use of water efficient taps, showers and toilets, and energy efficient white goods. These elements would deliver further benefits in terms of significantly reducing the impacts of the development, and these benefits would be accentuated by the use of sustainable construction techniques that will be employed in the build.
- 6.46 The proposal would also build in biodiversity enhancements, through the delivery of onsite habitat and nature-friendly planting, including the wildflower meadow. With this in mind, the proposal is considered to offer environmental gains. These benefits are considered to go

a significant way to offsetting any limited environmental harm that may be considered to be occur (notwithstanding that this statement has found no such harm to occur in any event).

- 6.47 As such, any harm would not significantly and demonstrably outweigh the benefits of the scheme, where the delivery of a new dwelling to the market would contribute to the districts housing supply. As such, the balancing of the main issues would result in a conclusion that the proposal is sustainable and, therefore, there would be a presumption in favour of it.

## **7.0 Planning Balance**

- 7.1 The proposal seeks permission for the conversion of the existing building on the site to form a new dwelling.
- 7.2 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990, applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The consideration is, therefore, whether the development accords with the development plan and, if not, whether there are material considerations that would indicate a decision should be taken contrary to the development plan.
- 7.3 The development plan includes the Mid Suffolk Core Strategy (2008) and its Focussed Review (2012) and the saved policies in the Mid Suffolk Local Plan (1998). In accordance with paragraph 79 of the NPPF and policy H9 of the Mid Suffolk Local Plan, the proposal seeks to make reuse of an existing building in the countryside where there can be no 'in-principle' objection to the proposed use.
- 7.4 The material considerations that are relative to the determination of this application have been satisfactorily addressed (including design and layout, highway safety, biodiversity, land

contamination, and residential amenity) such that they have been found to comply with the provisions of the NPPF and the relevant development plan policies.

7.5 One of the main issues is, therefore, the impact on heritage assets given the listed status of adjacent properties and the comments made within the previous application on the site. It has been found that the site is not attached to any of the adjacent properties and that the construction of the building has already been found to be acceptable. There would not be any direct impacts on heritage assets resulting from this proposal that would give rise to harm to these heritage assets, such that the proposal is also found to comply with the NPPF and policy HB1 in this regard.

7.6 As such, the proposal is found to be a sustainable development and the LPA is requested to support this proposal and enable the reuse of these buildings in the manner set out in this application.