



## SUPPORTING STATEMENT

In respect of a planning application for the change of use of land for use as wellness garden and rest area, erection of kiosk and covered seating area and installation of communal electric vehicle charging points at;

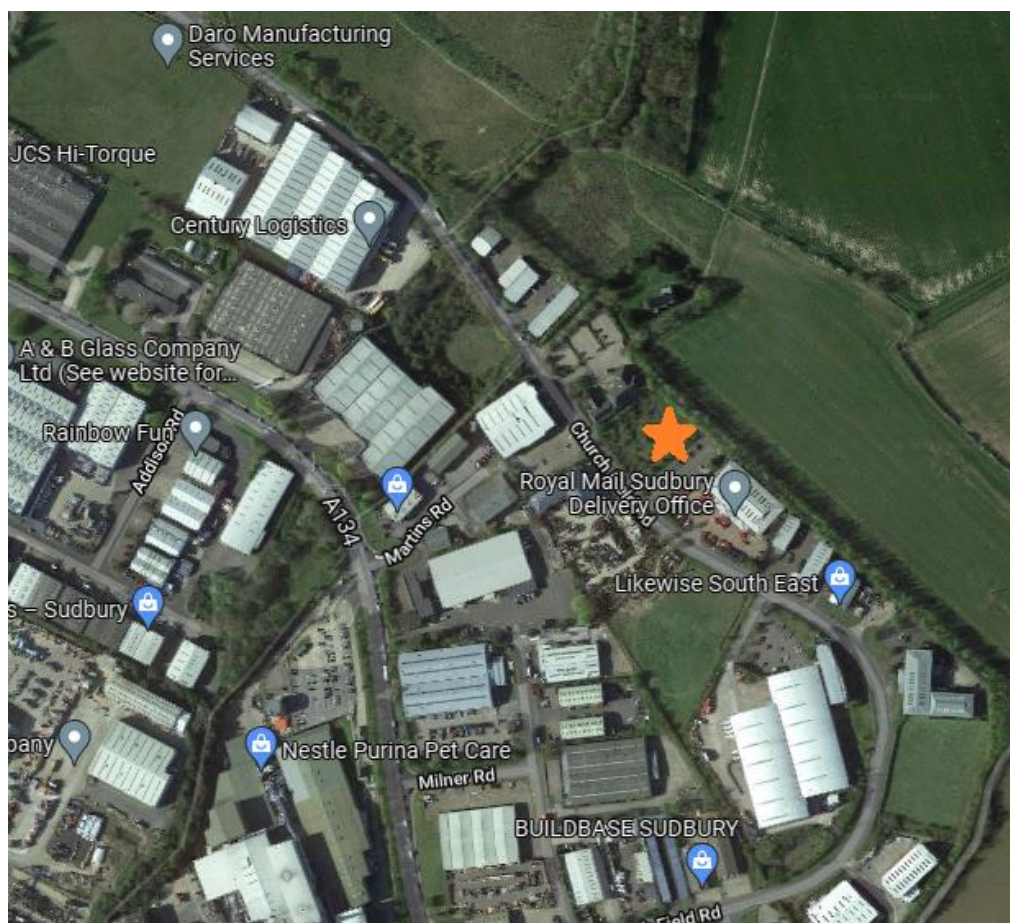
Land at Churchfield Road, Chilton Industrial Estate,  
Sudbury

## 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>5</b>  |
| <b>4.0</b> | <b>Planning History</b>        | <b>5</b>  |
| <b>5.0</b> | <b>Planning Policy Context</b> | <b>6</b>  |
| <b>6.0</b> | <b>Planning Considerations</b> | <b>7</b>  |
| <b>7.0</b> | <b>Planning Balance</b>        | <b>12</b> |

## 1.0 Introduction

- 1.1 This statement is prepared in support of an application for planning permission for the change of use of land to enable the use of a site at Churchfield Road, Chilton Industrial Estate, Sudbury, as a wellness garden and amenity space, along with the erection of kiosk to serve snack food. The proposal also provides for the provision of communal electric vehicle charging points and parking spaces for use by employees in the Business Park.
- 1.2 The statement will consider the planning policy position and provide an overview of the relevant material considerations relating to the proposed development. This statement should be read in conjunction with the Vision Statement prepared by Skyview Systems that accompanies this application and sets out the background to the proposal and how it will support the local community.
- 1.3 The extract below shows the location of the site within the Industrial Estate.



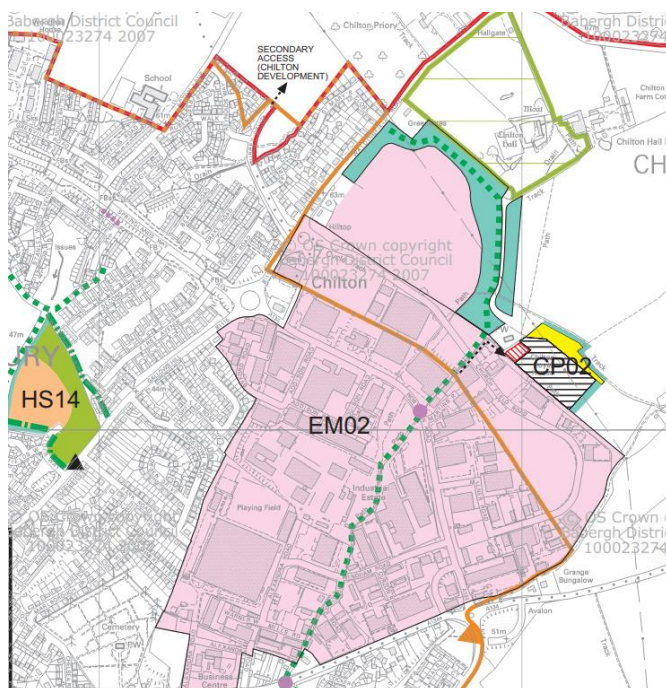
## 2.0 The Site

2.1 The site forms of a parcel of undeveloped land containing vegetation and set between the units known as 10a and 11 Churchfield Road respectively.

2.2 The image below shows the site from Churchfield Road, with the access shown being that serving the Royal Mail facility that operates from No.11.



2.3 The site lies outside the Built Up Area Boundary of Sudbury and in an area designated as a General Employment Area. This area is indicated by the pink on the map extract below.



2.4 There are no landscape designations that affect the site and the land is well contained from the land beyond the site (to the north) by a significant hedgerow.

### **3.0 The Proposal**

3.1 The proposal comprises a change of use of this land to form a wellness garden facility for those working in the locality, with particular relevance to the Post Office facility adjacent.

3.2 Whilst proposed as a comprehensive scheme, there are a number of individual elements that can be summarised as;

- A small retail kiosk measuring 6m x 3.5m;
- A covered seating area containing picnic benches;
- An area for walking and recreation;
- Electric car charging points.

3.3 The Vision Statement sets out the concept behind this proposal, identifying that

*“As employers, we are well aware of the limited choice for lunch and break times, with many lunch options requiring a car trip to the local town centre or supermarket. We fully recognise the need for a more sustainable, environmentally-friendly, healthy and convenient lunch alternative and for rest areas in the immediate vicinity. We hope that identifying this need this will benefit not just our own staff, but our tenants and local business staff too”.*

3.4 The application is supported by a plan showing how these areas would be delivered and laid out.

3.5 The electric car charging points would be available to book for those working in the wider estate. This type of facility is becoming more frequent in industrial areas, encouraging electric car usage and enabling workers to charge their vehicles whilst at work, ensuring that they are able to utilise electric vehicles for their commute.

### **4.0 Planning History**

4.1 There is no relevant planning history for this piece of land.

## 5.0 Planning Policy Context

5.1 The revised National Planning Policy Framework was published in July 2021. It sets out the Government's planning policy and is a material consideration when determining planning applications.

5.2 The NPPF is supported by the Planning Practice Guidance (PPG), which assists applicants and decision makers to interpret the NPPF.

5.3 At the heart of the NPPF is the presumption in favour of sustainable development. It identifies that *"For decision-taking this means:*

- *approving development proposals that accord with the development plan without delay; or*
- *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
  - i. *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
  - ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole".*

5.4 In terms of Local Policy, the following policies are considered to be relevant to this proposal;

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

- CN01 – Design Standards
- EM02 – General Employment Areas
- EM20 – Expansion/Extension of Existing Employment Uses
- TP15 – Parking Standards – New Development

## Babergh Core Strategy (2014)

- CS1 – Applying the Presumption in Favour of Sustainable Development in Babergh
- CS2 – Settlement Pattern Policy
- CS3 – Strategy for Growth and Development
- CS15 – Implementing Sustainable Development in Babergh
- CS17 – The Rural Economy

5.5 Where relevant to the consideration of this proposal, these policies will be referred to within the 'Planning Considerations' section of this report.

## **6.0 Planning Considerations**

6.1 The proposal seeks to use this parcel of underused land for a purpose that supports the existing employment uses and provides useable resting and relaxation space. Alongside this, the proposal provides electric vehicle charging points for electric vehicle users to charge their vehicles whilst at work within the vicinity of the site.

6.2 Saved policy EM02 identifies that;

*“On the sites identified as General Employment Areas and new employment allocations, namely:*

*Lady Lane, Hadleigh*

*Land east of Lady Lane, Hadleigh*

*Crowcroft Road, Nedging*

*Farthing Road, Sproughton*

*Ballington Hill Industrial Estate, Sudbury*

*Bulmer Road, Sudbury*

*Chilton Industrial Estate, Sudbury*

*Church Field Road, Sudbury*

*Woodhall, Sudbury (including its proposed extension)*



*Brantham Industrial Estate  
Waldingfield Road, Chilton  
and Former Sugar Beet Factory, Sproughton*

*planning permission will be granted for employment related development in principle. This will include the relocation of existing businesses from residential areas where these would be better located alongside other employment generating activities. Exceptions to this policy will include proposals likely to have an adverse impact on town (or village) centre vitality and viability. Proposals able to demonstrate a positive effect on town (or village) centre vitality and viability will be permitted”.*

6.3 Saved policy EM20 identifies that;

*“Proposals for the expansion/extension of an existing employment use, site or premises will be permitted, provided there is no material conflict with residential and environmental amenity or highway safety”.*

6.4 The proposal seeks to provide a use that would generate some employment through the operation of the proposed kiosk, but is ultimately aimed at supporting the existing businesses and the numerous employees that already work here.

6.5 As the requirements of policies EM02 and EM20 identify, the primary considerations here are in respect of the compatibility of the use relative to the existing uses, the impacts on town centre viability, residential and environmental amenity impacts and the potential impacts on highway safety.

6.6 However, prior to considering these matters directly, the following assessment is made regarding the sustainability of the proposal.

6.7 Paragraph 81 of the NPPF identifies that;

*“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic*



*growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential”.*

6.8 Paragraph 82 of the NPPF provides that planning policies should:

*“a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;*  
*b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;*  
*c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and*  
*d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances”.*

6.9 Furthermore, paragraph 84(a) states that 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”, and;*

*“d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship”.*

6.10 Paragraph 85 of the NPPF recognises that business and community needs in rural areas will require some flexibility, highlighting 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”.*

- 6.11 There can be little contention as to the accessibility of this site, given it’s location within an established Industrial Estate on the edge of a large market town. From an economic aspect, the proposal delivers significant benefits through job creation and the respective support to existing businesses that would result from this proposal. These benefits must be given significant weight in accordance with the provisions of the NPPF, a position that is accentuated further by the significant indirect benefits relating to the support that this proposal would offer to other service providers in the locality.
- 6.12 It is clear that the proposal is economically sustainable.
- 6.13 From a social perspective, the proposal is focussed on securing the sustainability of existing businesses and the social benefits that arise from continued employment and improved amenity facilities. The generation of new employment in this rural area would also bring social benefits through the support to local communities and the investment in the local area. The applicant is also committed to enabling the use of the site by community members, bringing a facility to the local area that will further community cohesion.
- 6.14 The environmental aspects of the proposal, as with any such use in a rural area, are more complex. The proposal would develop an underused parcel of land adjacent to a major road through the estate where accessibility is good. The provision of new electric charging points and associated site enhancements resulting from the reuse of this underused parcel of land are physical benefits resulting from the proposed uses, and the development has sought to locate the proposed uses in an accessible position to encourage people to walk and cycle to the facility.
- 6.15 At paragraph 105 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.

- 6.16 That position is supported by paragraph 85 of the NPPF (as quoted above) and the applicant has demonstrated why this site is entirely practicable for the use proposed given its accessibility and intended users.
- 6.17 As such, the proposal can be seen to deliver a sustainable proposal that accords with the objectives of the development plan and the NPPF as a matter of principle.
- 6.18 Turning now to the matters identified in policies EM02 and EM20, these are best considered under the following headings.

#### Compatibility of the Use Relative to the Existing Uses

- 6.19 The proposal is designed to support the existing uses in the estate, not to conflict with them. The proposal seeks to provide a service to employees and local workers and provide an area where they can relax, recreate and, if required, charge their electric vehicle.
- 6.20 The use is, therefore, entirely complimentary to the existing uses and would not give rise to any competition to existing facilities.

#### Impacts on Town Centre Viability

- 6.21 The proposal is a low key facility that is not proposed to compete with larger scale facilities in the town centre. It is proposed to support existing businesses, offer healthy alternatives to the existing fast-food offers in the estate, and there is little scope for this service to draw people away from the town centre due to its limited scale and form.

- 6.22 Whilst there is an element of retail use, this is not at a scale that would require a Sequential Test to be carried out. The use needs to be located here to provide the service to the existing users of the Industrial Estate.

#### Residential and Environmental Amenity Impacts

- 6.23 The proposal would not affect the residential amenity of any nearby properties, being sited some distance from the curtilage of any residential properties.
- 6.24 From an environmental aspect, the proposal would not affect the wider countryside nor would it result in any detriment to the established hedgerow along the northern site boundary. The land is of no particular amenity value from a visual aspect, such that its use for the purposes proposed would not be out of character with the adjacent commercial character.

#### Potential Impacts on Highway Safety

- 6.25 The proposal would make use of the existing access and would not result in significant levels of vehicular traffic to give rise to likely highway concerns.
- 6.26 Good visibility exists from the access and this would be maintained by the proposal.
- 6.27 For all of these reasons, it can be seen that the proposal complies with the development plan and the NPPF as a whole. In doing so, it must be concluded that this is a sustainable development that should be supported by the LPA.

## **7.0 Planning Balance**

- 7.1 The proposal seeks planning permission for the use of this underused parcel of land to provide a facility that will support the existing Industrial Estate, including amenity space, covered seating, a kiosk and electric car charging provision.

- 7.2 The proposal has been conceived following the recognition of the absence of such space within this established commercial area. It seeks to make effective and efficient use of this land, providing a facility that offers a range of services to local workers and employees.
- 7.3 The proposal has been tested against the provisions of saved policies EM02 and EM20 of the Babergh Local Plan Alteration No.2 (2006). It complies with the individual aspects of these policies through providing a use of land that does not give rise to harmful impacts. In finding compliance with the development plan, it is also found that there is compliance with the aspects of the NPPF that seek to support rural employment generation and to support existing businesses in a sustainable way.
- 7.4 The benefits of this proposal are considered to far outweigh any such harm. The scheme mitigates any harm as far as is possible through the very limited scale of the buildings and their location on the site.
- 7.5 As such, it is felt that the proposal demonstrates a cohesive approach to sustainability that complies with the NPPF and is in line with the way in which the dimensions of sustainable development are applied by Planning Inspectors and the Planning Officers alike. The Local Planning Authority is thereby respectfully requested to support this development and grant planning permission in the terms requested.