



**WILKINSON**  
PLANNING

## Planning Statement

SITE

Anglia Business Park, Wattisham Road, Ringshall,  
IP14 2HX

PROPOSAL FOR

Full Planning Application - Erection of 20 no.  
commercial units consisting of Class E(g) (office and  
light industrial) and B2 (general industrial)

PROPOSAL BY

Anglia Business Park Ltd

April 2022

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## 1.0 Introduction

- 1.1 This Planning Statement is produced for and on behalf of Anglia Business Park Ltd in respect of; Full Planning Application - Erection of 20 no. commercial units consisting of Class E(g) (office and light industrial) and B2 (general industrial).
- 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 its surroundings and other nearby development.

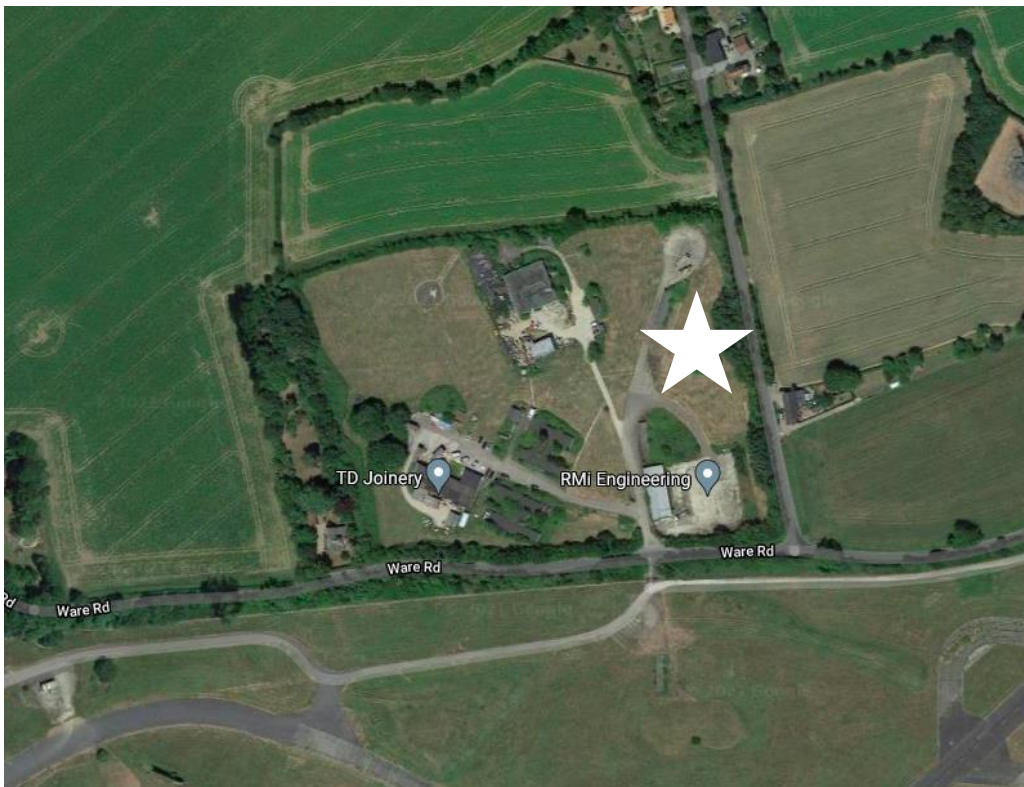


Figure 1.3.1 Aerial View

## 2.0 Site and Surrounding Area

- 2.1 The proposal site extends 1.9Ha and comprises of an existing commercial site with several commercial buildings located on it and businesses operating from it. The site is located north of Wattisham Road. Through the eyes of planning policy, the site is located within the

countryside but is well related to Great Bricett and Wattisham (which currently have no settlement designations) and Ringshall (Secondary Village). The site is enclosed by mature hedgerows, screening it from open agricultural land surrounding the site to the north, east, south and west. There are no nearby Public Rights of Way. The nearest dwellings to the site are located west (Cedar House) and east (Tye Cottage and Mead Cottage), with a scattering of other dwellings north.

2.2 The site does not fall within any Conservation Area, but the nearest listed building is located west of the site (Grade II listed Cedar house). The site is not within any designated landscape area (including Special Landscape Area or Area of Outstanding Natural Beauty). There are no trees on site or nearby which are protected by Tree Preservation Orders. The site sits within Flood Zone 1 (very low fluvial risk) and is also at a very low risk of pluvial flooding.

### 3.0 Proposal

3.1 The proposal seeks; Full Planning Application - Erection of 20 no. commercial units consisting of Class E(g) (office and light industrial) and B2 (general industrial). The proposed plans provide context:

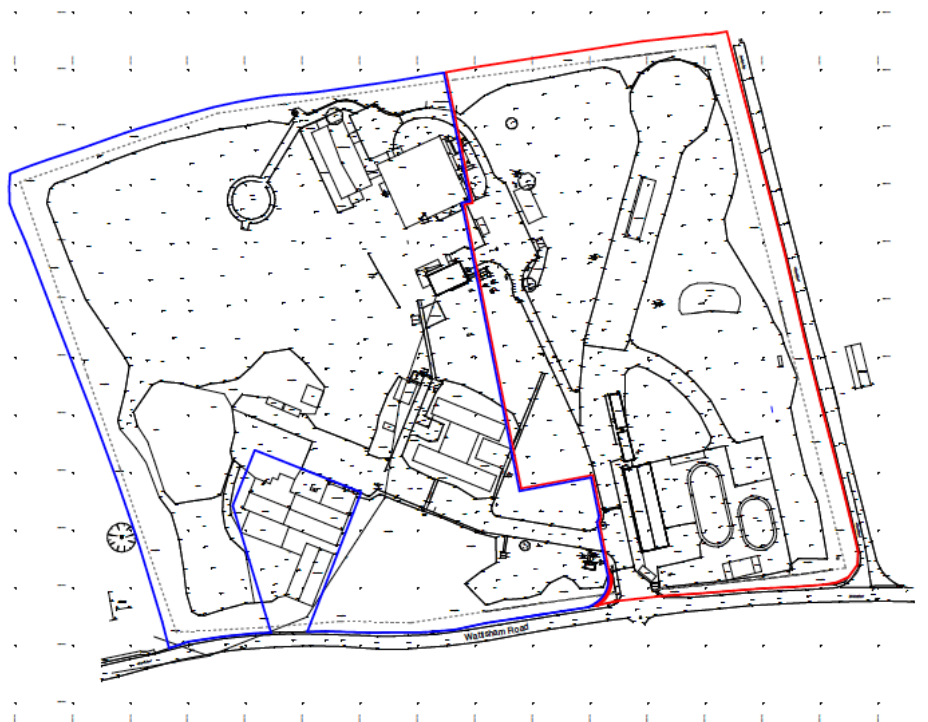


Figure 3.1.1 Site Location Plan



**Figure 3.1.2** Proposed Site Plan

3.2 The application is supported by a suite of plans and documents including;

- Application Form
- Planning Drawings
- Arboricultural Impact Assessment
- Land Contamination Report
- Topographical Survey
- Planning Statement
- Flood Risk Assessment
- Ecological Appraisal

#### 4.0 Planning Policy

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that if regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Acts, then that determination must be made in accordance with ‘the Plan’ unless material considerations indicate otherwise.

- 4.2 The National Planning Policy Framework 2021 (NPPF) contains the Government’s planning policies for England and sets out how these are expected to be applied. Planning law continues to require that applications for planning permission are determined in accordance with the Development Plan unless material considerations indicate otherwise. The policies contained within the NPPF are a material consideration and should be taken into account for decision-making purposes.
- 4.3 The NPPF is supported by the Planning Practice Guidance (PPG), which assists applicants and decision makers in interpretation the NPPF.
- 4.4 The site does not fall within an area with either an emerging nor adopted Neighbourhood Plan.

Mid Suffolk Core Strategy Core Focused Review (2012)

- Policy FC1: Presumption in Favour of Sustainable Development
- Policy FC1.1: Mid Suffolk Approach to Delivering Sustainable Development

Mid Suffolk Core Strategy (2008)

- Policy CS1: Settlement Hierarchy
- Policy CS2: Development in the Countryside and Countryside Villages
- Policy CS3: Reduce Contributions to Climate Change
- Policy CS4: Adapting to Climate Change
- Policy CS5: Mid Suffolk’s Environment

Mid Suffolk Local Plan (1998)

- Policy GP1: Design and Layout of Development
- Policy HB1: Protection of Historic Buildings
- Policy H17: Keeping Residential Development away from Pollution
- Policy CL08: Protecting Wildlife Habitats
- Policy T9: Parking Standards
- Policy T10: Highway Considerations in Development
- Policy E8: Extensions to Industrial and Commercial Premises
- Policy E9: Location of New Businesses
- Policy E10: New Industrial and Commercial Development in the Countryside

- Policy E12: General Principles for Location, Design and Layout

#### Supplementary Planning Guidance

- Suffolk Parking Guidance (2019)

#### 4.5 National Planning Policy Framework (2021)

- Para 7: Achieving sustainable development
- Para 8: Three dimensions to sustainable development
- Para 10 – 14: The presumption in favour of sustainable development
- Para 38: Decision making
- Para 47 – 50: Determination of planning applications
- Para 81 – 85: Building a strong, competitive economy
- Para 110 – 111: Highways impacts
- Para 119 – 120: Making effective use of land
- Para 130: Design quality
- Para 174: Landscape
- Para 194 – 197: Proposals affecting heritage assets
- Para 199 – 202: Considering potential impacts on heritage assets

4.6 At a local level, development plan policies FC1, FC1.1, CS1, CS2, E8, E9 and E10 are particularly relevant for assessing the principle of development.

4.7 This statement will consider other material planning policies in turn.

#### 5.0 **Planning History**

5.1 The site has been subject to several commercial based planning applications in the past as listed below:

Application Reference: 1494/17

Site Address: Anglia Business Park, Wattisham Road, Ringshall

Proposal: Erection of single storey front office extension and single storey rear workshop extension



Application Reference: 0553/06

Site Address: 3 Units at Anglia Business Park, Ware Road, Ringshall

Proposal: Erection of 3 no. B1/B2 units on site of substandard building to be demolished, with associated car parking and hardstanding

Application Reference: 0707/04

Site Address: Anglia Commercial Park, Wattisham Road, Ringshall

Proposal: Extensions to commercial premises for sawdust extract housing and timber store

Application Reference: 1353/02/

Site Address: The Anglia Site, Ware Road, Wattisham

Proposal: Variation of condition 2 of 386/02 to enable all buildings on the site to be used for B2 use

Application Reference: 0386/02/

Site Address: The Anglia Site, Ware Road, Wattisham

Proposal: Change of use of existing military buildings to B1 and B2 use

## 6.0 Material Planning Considerations

### 6.1 Principle of Development

6.2 As discussed above, policies FC1, FC1.1, CS1, CS2, E8 and E9 are considered the most important policies engaged in determining the acceptability of the principle of development. The proposal presents a commercial intensification of a site at a proportionate scale offering significant socio-economic benefits for the area. The proposal abundantly reflects the development plan policies cited, in harmony with paragraphs 8, 81, 82, 83, 84(a), 85, 119 and 120 of the NPPF.

6.3 At a local level, policies FC1 and FC1.1, seek to replicate the presumption in favour of sustainable development contained within paragraph 11 of the NPPF and sets out Mid Suffolk's approach to such presumption. It is therefore clear that the presumption is set out within the development plan and, as such, the application of the presumption is not simply weighed as a material consideration within the NPPF but is a consideration against which all



proposals must be determined. The LPA cannot choose not to apply it. The development plan has primacy, and the LPA would be incorrect in law if they chose not to apply it.

- 6.4 Policy CS1 provides a settlement hierarchy to sequentially direct development, forming part of a strategy to provide for a sustainable level of growth. Policy CS2 explicitly restricts development within the countryside unless it conforms with one of the uses set out which are considered compatible with the functions of the countryside. One such compatible use is identified as new buildings which would generate employment where there is an identified need. It is however a well settled principle that both policies CS1 and CS2 are not considered wholly consistent with the aims of the NPPF and as such are considered to hold only 'limited weight'.
- 6.5 Policies E8, E9 and E10 operate inter alia in respect of supporting rural commercial development subject to a range of design, landscape and highway criteria.
- 6.6 Policy E8 supports the extension of existing buildings and proliferation of industrial and commercial development where they are well related to existing buildings or curtilages, regardless of whether such sites are within existing settlements or the countryside. Further emphasis is placed on ensuring such extensions of premises / sites are sympathetic to the character and appearance of surroundings, environment, landscape, highway network and residential amenity.
- 6.7 Policy E9 directs new Class E(g) (former B1) businesses to existing premises, industrial / commercial sites or settlement boundaries and supports them in principle subject to ensuring they do not cause any demonstrable harm to the highway network, residential amenity or the environment.
- 6.8 Policy E10 relates to directing new industrial and commercial development towards settlement boundaries unless an overriding need can be demonstrated. New industrial and commercial premises will be assessed specifically in regard to their impact on the countryside, pollution, traffic, loss of agricultural land, contribution to the rural economy and employment opportunities in line with the NPPF.

- 6.9 As the proposal seeks to optimise and extend an existing commercial site it is not considered that there is a need to demonstrate that such units cannot be located nearer to existing settlement or sites, as the extension to existing commercial sites is supported in principle by policies E8 and E9. In any event the other nearest employment sites are located within Stowmarket (5.6 miles northeast), Hadleigh (8.3 miles south) and Great Blakenham (9.1 miles southeast) which offer commercial sites of a significantly larger nature and extent, and which do not support smaller scale businesses.
- 6.10 Notwithstanding that the Council's emerging Joint Local Plan currently holds limited weight, emerging policy SP05 seeks to steer development towards strategic road networks (A14, A12 and A140). The site would provide small units thus limiting the space for large scale operations on site. Moreover, such units would be limited to Use Class E(g) and B2, thus avoiding B8 uses which are reliant upon distributing operations and thus strategic road networks.
- 6.11 The direction of national policy is clear in supporting economic growth and recognising the importance of the rural economy, specifically through Chapter 6 of the NPPF.
- 6.12 Paragraph 10 of the 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".
- 6.13 Paragraph 81 places significant weight on economic growth stating:
- "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".*
- 6.14 Paragraph 82 advocates a flexible approach to economic growth, providing a platform for economic prosperity. Planning policies should:
- "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."*

6.15 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”.*

6.16 Paragraph 85 of the NPPF is intrinsically focused on supporting the rural economy:

*“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”.*

6.17 Paragraph 120 (d) goes further in setting out a range of ways that more effective use of land could be achieved, *“promote and support the development of under-utilised land and buildings”*. This aspect of the NPPF expressly supports the proposal inclusive of the applicant’s aims to increase and support economic growth within an existing commercial site by increasing the number of available units, optimising the currently underutilised land.

6.18 In light of local and national planning policies engaged, industrial and employment based development which generates significant benefits for rural commerce should not be discouraged, hindered or oppressed. Certainly, rural communities are changing and the supply of industrial / employment uses and facilities in the District should be endorsed. There has been a stand out need for rural enterprise and a high demand for industrial / employment, particularly for supply chain services. An existing occupant of the application site (RMi Engineering Ltd) is heavily involved in the marine and offshore industry, as this statement will go on to discuss. The delivery of the proposal would enable the business to grow through the provision of a bespoke engineering unit (Unit 20), with significant social, economic and environmental benefits, which should be endorsed.

- 6.19 Rural areas typically face certain disadvantages as places for business development. The most important tend to be linked to geography, population, infrastructure and resources. Relative isolation from markets, insufficient local demand and a lack of facilities and services can all restrict the growth potential of the local economy in rural areas. The proposal would provide a combination of uses which would all contribute to the local area in their own right.
- 6.20 Modern trends are creating new opportunities for the development of rural areas and the emergence of new rural businesses is on the rise. The internet and other digital technologies are offering the potential to overcome geographical issues and create new forms of proximity to knowledge, markets and relationships.
- 6.21 Meanwhile, new market opportunities are emerging in sectors as diverse as the food economy, the green economy, the bioeconomy, the experience economy, as well as the energy sector which remains poignant.
- 6.22 These market opportunities can lead to business development, and there is significant potential for job creation to attract people to live and work in rural areas. In this context, some of the advantages of rural locations become more apparent, including the likelihood of cheaper land and housing, more space, cleaner air and easier access to the countryside.
- 6.23 The key to taking advantage of these opportunities is to find smarter ways to deliver effective business support and to make targeted efforts to overcome these rural challenges. Opportunities in individual rural locations will be essential.
- 6.24 Whilst the delivery of housing is a prominent aspect of the present day planning landscape, places for people to work are also a necessity. This scheme would offer a suitably scaled in demand industrial / employment use, without demonstrable harm to the established commercial growth areas of the District noting the site's location.
- 6.25 The presence of existing commercial units and planning history establishes that the overall principle of commercial development within this confined location is acceptable. Whilst through the eyes of planning policy the site is technically located in the countryside, the proposed units clearly provide a natural addition to the site's existing commercial use without causing undue harms. The proposal would harmonise with and sit within the confines of the

existing commercial site, which is clearly demarcated from the surrounding open countryside by established landscaping.

6.26 As this statement will go on to discuss there is no demonstrable harm to outweigh the significant benefits that would accrue. The applicant would welcome discussions with the LPA as to conditions that may be considered appropriate (such as limiting uses).

6.27 For all of these reasons, the applicant considers that the proposal has demonstrated qualities that accord with development plan policies FC1, FC1.1, CS1, CS2, E8, E9 and E10, and the flexible approach advocated by the NPPF, and that the balance would fall in favour of this proposal.

6.28 Sustainability

6.29 Paragraph 8 of the NPPF sets out three dimensions for sustainable development:

*“a) an economic objective – 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;*

*b) a social objective – 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, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*

*c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*

6.30 It is a well settled principle that the test of connectivity considers two main aspects, being:  
The relationship to existing built development, and;

The relationship to facilities and services, and their accessibility

- 6.31 The relationship to existing built development - The site comprises of existing commercial units with the site demarcated from open countryside by established hedgerows and trees surrounding the site north, east and west. The site is well related to the established built form. The site is also appropriately separated from residential units protecting amenity whilst able to suitably accommodate B2 uses without causing undue residential amenity harm. The proposed units would sit comfortably within the site, whilst retaining a rural character.
- 6.32 The relationship to services, facilities and amenities, and their accessibility – The proposal would offer new employment within a more rural location and thus offers easier access for local employees. Paragraph 105 of the NPPF also recognises that options to utilise sustainable transport options will vary between urban and rural areas.
- 6.33 Economically, the proposal would generate a benefit for local trade and residents before, during and most significantly after construction. Furthermore, there will be a positive benefit through support of local amenities, facilities and services. Financially, the proposal would contribute to Business Rates. The units proposed would be subject to high-speed broadband network connection and high quality workspace. The spending power of the development would have positive impacts upon local business, as part of the supply chain.
- 6.34 Socially, the proposal yields positive benefits through the creation of healthy and functionally sound units required for day to day working, which would create positive interaction within the immediate and surrounding areas. The creation of jobs within this rural setting would further enhance the vitality of rural settlements and residents, whilst offering small-scale units for local businesses. The space provided will enable good industrial / employment space without materially hindering or oppressing the social enjoyment experienced by neighbouring industrial or domestic property. The proposal provides a contribution to much needed commercial space generating in a desirable form.
- 6.35 Environmentally, the site is already in commercial use separated from surrounding open countryside, reducing visual, landscape, ecological and character harms. The proposal does not offer a materially harmful character area or residential amenity intrusion. The nugatory heritage impacts and emphasis on the retention of trees (and enhancement) score positively.

The environmental qualities of the scheme, including net gains in biodiversity and ecology and providing fit for purpose modern commercial units which are more environmentally friendly than the existing units cannot be discounted and will enable the scheme to flourish. The developable form would be of high quality through appropriate materials and appearance. The performance of the units would exceed current Building Regulations standards, embedding positive measures to reduce carbon emissions and energy usage. The introduction of electric charging points on site would further increase the environmental credentials arising from expanding the existing commercial site.

6.36 The proposal could also incorporate the following sustainable benefits:

- Energy efficient integrated appliances
- Air / Ground source heat pumps
- Renewable technologies which would facilitate low-carbon development

6.37 Such benefits are considered to go a significant way in offsetting any limited environmental harm that may occur arising from the location. As such, any harm would not significantly and demonstrably outweigh the benefits of the scheme:

- Layout of the development designed in response to local constraints and opportunities, considering measures to ensure the character of the development reflects the character of the environment and creates a safe and sustainable community
- Provision of new industrial / employment units which will support local businesses and services
- Sustainable materials and construction methods
- Use of measures to reduce pollution during construction and operation including measures related to noise pollution, air quality and water pollution
- Development designed to minimise the impact of the proposal on the site habitats and wildlife including retention of trees, as well as a range of mitigation and enhancement measures to improve the sites biodiversity
- Measures to manage waste during both construction and occupation to reduce waste and maximise recycling

- Development of new units in Flood Zone 1 and inclusion of a surface water management system including SUDs to manage the 1 in 100 annual probability plus 40% climate change rainfall event.

6.38 The social, economic and environmental uplift is clearly deliverable as shown through the suite of submitted plans, which secures sustainable design and function. The proposal strongly reflects the spirit of paragraph 8 of the NPPF, and is therefore considered economically, socially and environmentally sustainable.

6.39 Employment

6.40 As discussed through policies E8, E9 and E10, the LPA will support schemes which assist in the delivery of rural commerce. In this instance, there are distinct benefits brought forward by the nature and extent of a key site occupier.

6.41 The existing site is occupied by small scale SME businesses, with RMI Engineering Ltd (<https://railmarine.co.uk/sectors/marine-offshore>) operating the most part of the site. The proposal hereby submitted includes a bespoke premises for RMI Engineering Ltd shown in full plans form, through Unit 20.

6.42 Unit 20 is custom unit designed for the heavy duty engineering operations of the business, but which will serve the needs of RMI Engineering Ltd now and in the future.

6.43 RMI Engineering Ltd are a highly experienced rail and offshore energy industry provider, offering 'Tier 1' services to offshore wind and energy firms through support engineering, maintenance and monitoring contracts in the North Sea. RMI Engineering Ltd are an integral part of the wider North Sea energy industry, which is also combined with regional rail services. RMI Engineering Ltd employ 29 no. staff who are based at HQ (the application site) and on site (the North Sea). Unit 20 is a bespoke unit which will enable the firm to grow, at a location which is capable of accommodating such growth in a proportionate and measured manner.

6.44 The scheme carries the potential to create circa 100 no. jobs on a permanent basis, with wider potential increase throughout the supply chain.



6.45 Design and Layout

6.46 Policies CS5, GP01 and E12 seek to encourage good design and layout in new commercial development. The LPA will grant permission for proposals which meet the design criteria. Furthermore, the NPPF places a strong emphasis on good design, in particular through Chapter 12 'Achieving well-designed places' containing a number of policies which can support the delivery of good design and stating that planning decisions should ensure that developments at paragraph 130; *"are visually attractive as a result of good architecture"*.

6.47 The proposed development would comprise of 20 no. new commercial units which would be spatially configured in a sympathetic manner retaining significant areas of landscaping. The proposed building heights and materials would deliver a high quality development reflective of local character.

6.48 The size, scale and location of the units within the site are suitably set in order to sit seamlessly within the backdrop of the locality, inclusive of tonal finishing. The scale and mass of built development nearby varies considerably, therefore a topographical survey has dictated the finished floor levels and resultant ridge heights relative to other commercial built form, as well as established trees and hedgerows. The resulting built form proposed will integrate within the natural topography of the landscape. The proposed scale combined within tone and texture of materials will create an appreciative commercial build, which does not dominate the built character or form of the area. The appropriateness of the proposal is entirely in sync with the area, and will provide an outstanding commercial design response.

6.49 The proposal includes:

- Roof – Metal (Goosewing Grey)
- Walls – Metal / Engineering Brick
- Windows – Aluminium
- Doors – Aluminium
- Roller Shutter Doors – Aluminium
- The applicant welcomes any reasonable materials / fenestration condition(s) the LPA may be inclined to impose, in the interests of proper planning, and in securing good design as set out.

- 6.50 By virtue of the appropriate materials used, the significance of a material change in the appearance of the land in this locality is reduced. Delivery of an acceptable design and layout is an entirely realistic prospect, generating a much improved visual aesthetic within the landscape.
- 6.51 Highways
- 6.52 Policies E8, E9 and E12, T9 and T10 operate inter alia to ensure commercial development does not adversely affect the highway network or its users through securing safe access / egress, parking and connectivity.
- 6.53 Paragraph 111 of the NPPF confirms 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. The courts have held that the principle should not be interpreted to mean anything other than a severe impact on highway safety to be acceptable (*Mayowa-Emmanuel v Royal Borough of Greenwich [2015] EWHC 4076 (Admin)*), which this proposal does not create.
- 6.54 Highways safety is an integral aspect of the scheme. From assessment of the plans, including visibility splays, and the nature and extent of the existing access / egress arrangements, the applicant is of the sound opinion that a safe access / egress can be achieved on site to accommodate the proposed intensification of use and thus increased vehicular movements.
- 6.55 The spatial parameters of the site would provide an appropriate level of parking provision and manoeuvring space for each commercial unit to serve employees and HGVs in accordance with policy T9 and Suffolk County Council Parking Guidance (2019). Across the site 80 parking bays are proposed alongside 8 disabled bays and 26 bays supported by electric vehicle charging points.
- 6.56 The proposal responds well to policies E8, E9, E12, T9 and T10, paragraphs 110 and 111 of the NPPF, and adopted parking standards, all underpinned by Case Law. There is nothing before the LPA or LLHA to suggest the scheme should be refused upon highways grounds.
- 6.57 Heritage

6.58 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).

6.59 At the local level, policies FC1, FC1.1, CS5 and HB1 deal with the historic environment and specifically listed buildings and their settings.

6.60 At a national level, there are specific NPPF policies relating to designated heritage assets that should be considered in this case. Paragraph 197 is particularly relevant to the determination of this proposal:

*“In determining applications, local planning authorities should take account of:*

*a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*

*b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*

*c) the desirability of new development making a positive contribution to local character and distinctiveness”.*

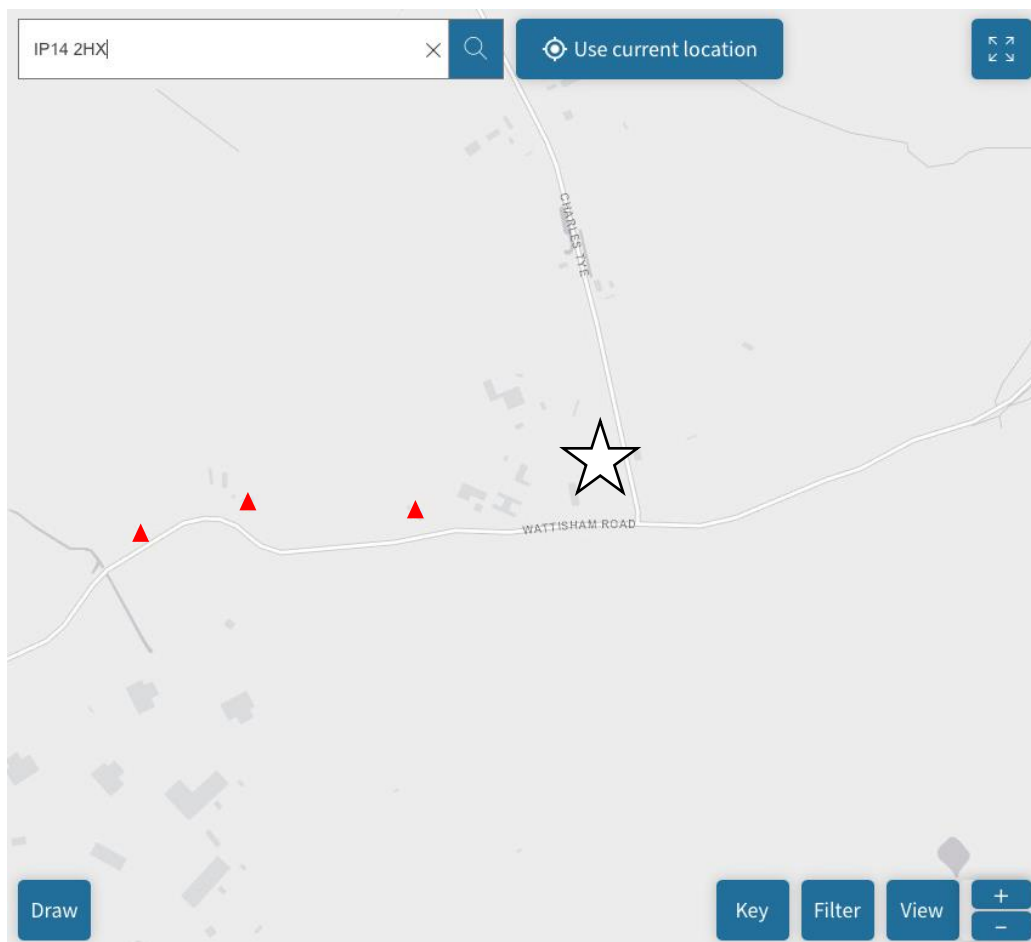
6.61 Paragraph 199 of the NPPF states; *“when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation.”* It continues to identify that; *“This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance”.* The more important the asset, the greater the weight should be.

6.62 Paragraph 202 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.

6.63 Impacts on the significance of designated heritage assets is defined within the NPPF as including alteration, destruction and development within its setting. The NPPF further defines the setting of a heritage asset as the surroundings in which it is experienced. The extent is not

fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset; may affect the ability to appreciate that significance; or may be neutral.

- 6.64 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.



**Figure 6.64.1** Historic England Map Search (site depicted by star)

- 6.65 The proposal is spatially balanced and would not impinge adversely upon the historic character or heritage status of the Grade II listed building (Cedar House) west of the site. The visual impacts from near or far would not diminish the historic qualities of the identified asset, nor how it would be read and understood. Based on the site’s historical military use and existing commercial use it is not considered that an intensification of commercial use

within the site would harmfully alter the setting of Cedar House. The proposal would not give rise to adverse heritage harm as a matter of principle, as the historic curtilage of Cedar House would remain unaltered.

6.66 Notwithstanding that the proposal does not affect the setting of the nearby listed building, in the event a level of harm were to be identified by the Council, there are significant public benefits, specifically in economic and social terms that would outweigh such harm.

6.67 Residential Amenity

6.68 Policies GP1, E12 and H17 seek to ensure that development protects the amenity of its surrounding areas taking into account privacy, overlooking, outlook, noise, smell, light, visual impact, pollution, daylight and sunlight. Paragraph 130 of the NPPF also holds regard to the protection and preservation of residential amenity.

6.69 The proposal offers sympathetic commercial development within the confines of an established commercial site. Whilst there would be intensification of use on the site, there are only 3 no. dwellings adjacent to the site. The potential for adverse residential amenity is therefore limited. Moreover, the site's location and separation distances would accommodate B2 uses which are ordinarily less appropriate within built-up areas. The applicant would nonetheless welcome discussions with the LPA around the use of conditions that could mitigate any potential detrimental impact that could arise from the development.

6.70 Landscape

6.71 Policy CS5 and paragraph 174 of the NPPF seek to maintain and or enhance landscape qualities of the area, through appropriate design which harmonises with the landscape setting.

6.72 The site is not located within an area subject to any landscape designation. However, the development nonetheless delivers a high standard of landscaping to harmonise with the local character.

- 6.73 Paragraph 131 of the NPPF supports the planting of new trees and retention of existing trees within development. New native trees are proposed within the site and along the boundaries of the site to reinforce and retain a rural character, whilst softening areas of hardstanding. The incorporation of swales and an attenuation basin as part of the drainage strategy discussed later in this statement would further visually enhance the development within the confines of the site.
- 6.74 Only trees within the main body of the site are proposed for removal, and as the supplied Arboricultural Impact Assessment (AIA) demonstrates, this ensures that the overall landscape impacts are mitigated by retaining the remainder of trees and hedgerows and would be compensated by the replanting of new trees within the body of the site. The AIA suggests that an arboricultural specialist supervises key stages of the development to ensure the existing hedgerows and trees for retention can be protected during and after construction.
- 6.75 The applicant would welcome discussions with the LPA around the use of conditions to secure the proposed landscaping and retain the existing trees and hedgerows as may be required.
- 6.76 Ecology and Biodiversity
- 6.77 Regulation 9(5) of the Conservation of Habitats and Species Regulations 2010 (Implemented 1st April 2010) provides that all "*competent authorities*" (public bodies) to "*have regard to the Habitats Directive in the exercise of its functions*".
- 6.78 Guidance on the conservation of protected species is given in ODPM Circular 06/2005. At Paragraph 99 the Circular advises that the presence or otherwise of protected species, and the extent to which they might be affected by the proposed development, must be established before planning permission is granted. However, developers should not be required to undertake surveys for protected species unless there is a reasonable likelihood of the species being present and affected by the development. Where this is the case, the survey should be completed and any necessary measures to protect the species should be in place before the permission is granted.

- 6.79 There are no recordings of protected species or their habitats, within the site or likely to be affected in the immediate area. As supported by the supplied Preliminary Ecological Appraisal, the development of the site would not detrimentally affect protected species or their habitats, moreover, a range of mitigation measures and biodiversity enhancement measures are proposed to further improve the environmental and ecological credentials of the site.
- 6.80 Nonetheless, the applicant has demonstrated commitment to protecting and preserving ecological and biodiversity value through the scheme proposed. The scheme accords with the aims of paragraphs 174 and 180 of the NPPF which seeks to conserve and enhance biodiversity and the natural environment.
- 6.81 The applicant acknowledges their duty to adhere to the Habitat Regulations 2017.
- 6.82 Flood and Water
- 6.83 Policy CS4 and paragraph 159 of the NPPF seeks to ensure development is located in areas at the lowest risk of flooding.
- 6.84 The site is located within Flood Zone 1 and is not at a very low risk of pluvial flooding and thus passes the sequential test as set out within policy CS4 and paragraphs 159 and 162 of the NPPF. However, as the site extends over 1 hectare, a Flood Risk Assessment (FRA) supports the application to ensure appropriate drainage is incorporated into the scheme.
- 6.85 Paragraph 169 of the NPPF sets out the requirement for SuDS to be incorporated into major developments, such systems should:
- “a) take account of advice from the local lead flood authority;*
  - b) have appropriate proposed minimum operational standards;*
  - c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development;*
  - d) where possible, provide multifunctional benefits.”*

6.86 The surface water drainage strategy incorporates the use of swales and an attenuation basin which would be discharged to the existing watercourse. Such SuDS will be appropriately managed. As demonstrated through the FRA, the development would therefore be safe for its lifetime and would not increase flood risk elsewhere and would thus be compliant with local and national policy.

6.87 The applicant would welcome discussions with the LPA in conjunction with the LFA as to any conditions considered appropriate in relation to the proposed drainage strategy.

6.88 Land Contamination

6.89 There is no known land contamination issue, with an extremely low contamination potential. The site is not considered to present risk to future commercial users from land contamination as outlined in the Phase I Land Contamination Report submitted.

6.90 Delivery and Construction

6.91 The deliverability of a development is an important factor in an assessment as to its sustainability (in terms of its benefits) and in terms of its contribution to the supply of employment land in the District.

6.92 The NPPF defines deliverable:

*“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years” and; “Sites with outline planning permission... should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years”.*

6.93 The NPPG gives further guidance on those considerations under the chapter heading ‘*Housing and economic land availability assessment*’ and includes three, important concepts; suitability, availability, and achievability. Whilst primarily aimed at aiding the plan-making process, the principles are no less useful when considering the deliverability of this development. The NPPG also identifies information relating to site viability, ownership



constraints or infrastructure provision, and a statement of common ground between the LPA and the developer confirming the anticipated build-out rates.

6.94 The site is considered to be suitable for development, providing significant benefits of employment land, landscaping and high quality design, in an accessible location reducing the need to travel by private car compared to more remote areas of the District, and net gains for ecology and biodiversity. There is a reasoned expectation that the development would make a valuable and positive contribution to the employment land supply in the short term and at an expeditious rate.

6.95 Turning to the construction implications of the proposed development, the arrival of construction vehicles and materials is likely to have a temporary impact on the road network that surrounds the site. It is recommended that the developer produce a detailed Construction Management Plan (CMP) in conjunction with any contractors and sub-contractors employed on the site prior to construction commencing. A competent contractor will have a better idea of the actual site constraints and necessities post detailed design than can be described at this stage. This CMP should be agreed with the LLHA and take into account that:

- Parking on Wattisham Road by vehicles associated with the construction of the development should not be permitted for the duration of the working day. Similarly parking in surrounding streets, should also not be permitted. It is therefore recommended that an allowance is made for these vehicles within the site during the construction phase.
- It is recommended that deliveries are, where possible, delivered in bulk to site and from a single supplier.

6.96 Facilities should be provided on site to allow wheel cleaning before vehicles exit the site. This should assist in the control of dust and dirt from leaving the site.

## 7.0 Planning Balance

7.1 The proposal seeks planning permission for; Full Planning - Erection of 20 no. commercial units consisting of Class E(g) (office and light industrial) and B2 (general industrial). The

applicant acknowledges the LPAs position concerning planning conditions and welcomes discussion around the agreement of conditions.

- 7.2 As concluded by accompanying professional reports and plans, there are no technical reasons to refuse planning permission and there are no barriers preventing the site from delivery, especially noting its existing commercial use. As this statement has demonstrated this proposal is clearly supported at a local at national level.
- 7.3 Whilst the development plan is the starting point, it is not the end point. Policy supports the principle of development, with demonstrable economic and social benefits accruing. The site is preferentially located within an existing and established commercial site. The proposal would enable the retention and growth of existing rural businesses, whilst supporting rural economic growth and prosperity through the creation of new commercial units available for a range of uses.
- 7.4 Accordingly, it is evident that there are no adverse impacts arising from the development which would outweigh the abundant benefits of the scheme, to a level warranting refusal of planning permission. In any event, the out of datedness of local policies and the application of the presumption in favour of sustainable development advocated by the NPPF signify that the proposal should be granted planning permission without fail or delay.
- 7.5 In light of this and taking account of all the considerations set out above, it is hoped that the LPA will support this sustainable development by granting planning permission in the terms requested.
- 7.6 Even if the LPA were to consider that harm(s) were identifiable, the abundant benefits brought by this scheme clearly confirm that this is a sustainable scheme which should be supported by Mid Suffolk's 'open for business' ethos.
- 7.7 In light of this and taking account of all the considerations set out above, it is hoped that the LPA will support this sustainable development by granting planning permission in the terms requested.