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# Planning Statement

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Application for Change of Use of Two Former Aircraft Hangars and Existing Airfield Building to Commercial Storage (Use Class B8), Siting of Six Storage Containers with Associated Vehicular Access and Parking

Great Ashfield Airfield, Haugh Lane, Great Ashfield, Suffolk, IP31 3HP

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## 1. Introduction

### Introduction and Background

- 1.1 This Planning Statement has been prepared on behalf of John Miles and Sons (the Applicant) in support of a full planning application to be submitted to Babergh and Mid Suffolk District Councils (BMSDC) for the change of use of two former aircraft hangars and an existing airfield building to commercial storage uses falling within Use Class B8 with the siting of six of containers and associated vehicular access and parking ('the Proposed Development') at Great Ashfield Airfield, Haugh Lane ('the Site').

### Overview of the Development

- 1.2 The development site forms part of the wider Great Ashfield Airfield land. Up until the Second World War, Great Ashfield Airfield was used by the RAF for training purposes. In 1942 it was subject of significant additional development, and rebuilt for use by the US Air Force, who began operating from it in 1943.
- 1.3 The airfield reverted to use by the RAF post-war up until 1960, at which point it was sold and its military use ceased. It remained in civilian use up until 2018, at which point its use as an airfield ceased entirely.
- 1.4 The Proposed Development proposes a change of use of two former aircraft hangars and detached redundant building for use as commercial storage falling under Use Class B8. No alterations to the buildings themselves are proposed.

### The Applicant

- 1.5 John Miles and Sons already operate a successful commercial storage business in the immediate locality. This application for a change of use would further enhance the former airfield site putting existing redundant structures back in to use whilst assisting a well-establish business to expand its services.

### Pre-Application Engagement

- 1.6 This application has been the subject of pre-application engagement with a Planning Officer at BMSDC. This process included a virtual meeting on 2 September 2022 with subsequent written advice provided on 15 September 2022. BMSDC accepted the principle of development and the feedback received has directly informed the development of the proposal submitted.

### Supporting Documents

- 1.7 This Planning Statement is supported by the following architectural plans prepared by Modus Architecture:
- 22-0058-001 Rev A Site Location Plan
  - 22-0058-002 Rev B Site Layout and Block Plans

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- 22-0058-003 Existing Building 1
- 22-0058-005 Existing Building 2
- 22-0058-004 Existing Building 3

1.8 The planning application has also been informed by input from professional external consultants, with the supporting documentation comprising of the following:

- Transport Statement – Journey Transport Planning
- Preliminary Ecological Appraisal – Plumb Associates Ltd

## 2. The Site

### Site Characteristics and Surrounding Area

- 2.1 This section provides a brief description of the Site and the immediate surrounding area.
- 2.2 The Site is located within the open countryside in the adopted Development Plan, located approximately 1.25 miles north of Elmswell and 9.3 miles east of Bury St Edmunds. Junction 47 of the A14 trunk road is just a 9 minute drive from the site.
- 2.3 The land the subject of this application covers a total area of 0.6 hectares. The Site is rectangular in shape with the boundaries closely following that of the existing hardstanding (former taxiways/runways).
- 2.4 The Site is adjacent to a number of existing agricultural and storage buildings. The nearest residential property is in excess of 450 metres west of the application Site. An existing Public Right of Way (PRoW) runs along Haugh Lane to the west of the Site.
- 2.5 The existing buildings for which a change of use is sought comprise of a silver dome-shaped metal aircraft hangar to the north-west of the site adjacent to a redundant concrete panelled building, whilst at the south-eastern end of the Site is a smaller green aircraft hangar with metal doors and pitched roof, along with brick walls.
- 2.6 There are no trees on the application Site itself but there are some trees and other vegetation to the immediate north of the Green southern Hangar. However, given that there are no proposals to enlarge or modify the existing buildings, the existing vegetation would remain unaffected and provide a degree of screening and separation between the hangar and adjacent agricultural buildings.

### Planning History

- 2.7 As previously documented, the application Site forms part of the former Great Ashfield Airfield which finally closed in 2018. There is no recent or relevant planning history available online in respect to the subject hangars and building.
- 2.8 There are a number of previous applications and permissions on adjoining land, but these are not considered recent or relevant in the context of the current change of use application. However, it is noted that there is an existing commercial storage use which adjoins the airfield site which was granted consent by the Council in 2019 (reference: DC/18/04506).



## 3. The Proposed Development

3.1 The Proposed Development seeks a change of use of the following structures to B8 commercial storage use with the following gross internal floor areas:

- Aircraft Hangar 1 (Existing Building 1) - 300m<sup>2</sup>
- Aircraft Hangar 2 (Existing Building 3) - 113m<sup>2</sup>
- Airfield Building (Existing Building 2) - 150m<sup>2</sup>

**TOTAL: 563m<sup>2</sup>**

3.2 It is not intended that there would be a 'distribution' element to the proposed use. The development would also include the siting of six 20 foot containers along with associated access and parking arrangements.

3.3 The following weekly hours of operation are proposed:

<b>Days:</b>	<b>Hours:</b>
Monday – Friday	06:00 – 19:00
Saturday	07:00 – 18:00
Sunday	08:00 – 17:00

3.4 It is considered that the hours of operation are appropriate for the uses proposed and would not be at detriment to any nearby residential properties. In addition, these hours are considered suitable in order to attract end users for the buildings.

3.5 Furthermore, it is noted that the existing agricultural uses adjacent to the site regularly operate between 18 to 24 hours a day.

### **Vehicular Access and Parking**

3.6 The primary site access is to be taken from Haugh Lane to the west of the site. This access road already serves the adjacent agricultural premises.

3.7 A Transport Assessment has been prepared in support of this application by Journey Transport Planning. It confirms that access to and from the Site is acceptable and that vehicular movements would not have a significant or adverse impact on the local road network.

3.8 The Proposed Development will provide 9 vehicular parking spaces for cars in accordance with adopted standards. There is ample space for lorries to park on Site whilst loading and unloading takes place. Given the

extent of the existing hardstanding on Site, there is more than sufficient space for goods vehicles to enter, manoeuvre and exit the Site in a safe manner. The proposal also includes 4 spaces for Powered Two Wheelers (PTWs), 3 disabled bays and 8 bicycle spaces.

- 3.9 The proposed changes of use would result in the creation of new local jobs. The end users of the buildings are not yet known, but it is not envisaged that there will be a high number of private vehicle movements to and from the Site during the course of a typical week given the proposed use.
- 3.10 Furthermore, there would not be any implications for pedestrian safety in relation to the PRow on Haugh Lane. Larger vehicles have been using Haugh Lane for a number of years without incident and therefore any increase in vehicle movements arising from this development is unlikely to alter the status quo.
- 3.11 Given all of the foregoing, the proposal is acceptable in all respects from a transport, access and highways perspective.

## Landscaping, Trees and Ecology

- 3.12 The scope for additional landscaping on site is somewhat limited given the extent of hardstanding which surround the existing hangars and building. Photographs of the three buildings can be seen on Pages 10 to 13 of the submitted Preliminary Ecological Appraisal (PEA).
- 3.13 It is not envisaged that any existing trees or vegetation would be impacted by the Proposed Development given that the existing structures are remaining unaltered.
- 3.14 A PEA was undertaken at the site by Plumb Associates. The PEA looked at all three buildings and concluded that:  
***“The interiors and exteriors of the buildings were assessed, and all were considered to have negligible potential for supporting roosting bats. The site is considered to have no potential for supporting protected or important species. The site is of negligible ecological value.”***
- 3.15 On this basis, the proposed change of use is considered acceptable in respect to ecology, trees and landscaping.

## Flood Risk and Drainage

- 3.16 The site is located wholly within Flood Zone 1 wherein there is a low probability of flooding.
- 3.17 None of the subject buildings are currently connected to a foul drainage system nor is there any intention or requirement to. Surface water run-off will flow into an existing drainage system on site.

## Heritage

- 3.18 Despite the history of the application Site, there are no statutory Listed Buildings on or within close proximity to the existing buildings. The nearest Listed Building is the Grade II Listed Lea Farmhouse which is some 520 metres west of the Site. However, there is dense vegetation and existing buildings between Lea Farmhouse and the application Site so views between the two are non-existent.
- 3.19 On this basis, it is not considered that there are any conservation or heritage concerns in respect to this application.





## 4. Flood Risk Assessment

- 4.1 The site is located wholly within Flood Zone 1 wherein there is a low probability of flooding. The proposal relates to a minor application on a Site of less than 1ha. On this basis, a Flood Risk Assessment (FRA) is not usually required.
- 4.2 The surface water flood map identifies no flooding risks arising from rivers, the sea or reservoirs.
- 4.3 Under the published vulnerability classifications, the use of the buildings for Class B8 (Storage and Distribution) purposes would fall within the ‘less vulnerable’ category and the development deemed appropriate.

	<b>Flood Risk Vulnerability Classification</b>				
<b>Flood Zone</b>	<b>Essential Infrastructure</b>	<b>Highly Vulnerable</b>	<b>More Vulnerable</b>	<b>Less Vulnerable</b>	<b>Water Compatible</b>
Zone 1				✓	

Key:  
 ✓ Development is appropriate  
 X Development should not be permitted.

- 4.4 It has been identified that Hangar 2 within the eastern part of the Site is within a Low and Medium risk area for potential instances of surface water flooding.
- 4.5 A ‘low’ risk area is considered to have a chance of flooding of between 0.1% and 1% each year, whilst a ‘medium’ risk is between 1% and 3.3% each year. The remaining parts of the site fall within the ‘very low’ category wherein there is a less than 0.1% chance each year of flooding. There are no known recorded flood occurrences for the Site.
- 4.6 None of the existing buildings are connected to a foul drainage system nor is there any intention or requirement to connect them. Surface water run-off will continue to be discharged into an existing drainage system on site. No alterations to this system are required or proposed in this instance.
- 4.7 Given the nature of the Proposed Development, there would be no increase in built form or additional hardstanding created. Therefore, surface water run-off rates would not change by comparison to the existing situation on site. On this basis, it is not considered that the Proposed Development would worsen or be exposed to instances of surface water flooding.

## 5. Planning Policy

- 5.1 In accordance with Section 38(6) of The Planning and Compulsory Purchase Act (2004), planning applications should be determined in accordance with the development plan unless other material considerations indicate otherwise.
- 5.2 The proposals for the site have taken account of relevant national and local planning policy. This section of the Planning Statement sets out a brief summary of the relevant planning policy documents, whilst the following section demonstrates compliance with these policies.
- 5.3 The National Planning Policy Framework (NPPF) (updated July 2021) is also a material consideration when determining planning applications.

### Development Plan

- 5.4 The Site is located within the BMSDC administrative area.

#### Adopted Development Plan

- 5.5 The adopted Development Plan comprises the Mid Suffolk Local Plan (1998) and the Mid Suffolk Core Strategy Development Plan Document (2008) with Focused Review (2014).

#### Mid Suffolk Local Plan

- 5.6 Policy SB2 has regard to *Development Appropriate to its Setting*. It states that:

***The District Planning Authority will refuse development which does not have a form, scale or character in keeping with the surrounding area.***

- 5.7 Furthermore, Policy CL1 relates to the *Guiding Principle to Development in the Countryside*. It states that the landscape quality and character of the countryside will be protected and that development proposals should be sited and designed to have a minimum adverse effect on the appearance of the landscape.

- 5.8 Additionally, Policy GP1 *Design and Layout of Development* states that:

***Poor design and layout will normally be refused in new development. The District Planning Authority will normally grant permission for proposals which meet the following design criteria:***

- ***Proposals should maintain or enhance the character and appearance of their surroundings, and respect the scale and density of surrounding development;***

- **Materials and finishes should be traditional, or compatible with traditional materials and finishes and should respect local architectural styles where appropriate;**
- **The siting of buildings and the creation of open spaces between existing and proposed buildings should maintain or enhance the character of the site, with attention to the treatment of boundaries particularly on the edge of settlements;**
- **Layouts should incorporate and protect important natural landscape features, including existing trees, shrubs and hedgerows;**
- **Proposals should make proper provision for the garaging, parking and turning of motor vehicles and for footways and access in a manner that does not dominate the appearance and design of the layout;**
- **Landscaping should be regarded as an integral part of the design proposals;**
- **The interrelationship between buildings and open spaces in any layout should act to minimise opportunities for criminal activity; consistent with good layout and architectural design.**

5.9 The proposal in this instance involves the conversion of three existing buildings previously used in conjunction with the airfield. Given the changes proposed, the use would not have a detrimental impact on the character or appearance of the former airfield or its immediate surroundings. No alterations are proposed to the buildings themselves.

5.10 It is intended that six containers would be placed on site to provide additional storage space. The 20 foot containers would be coloured green and not stacked, thus having less of a visual impact given the countryside locality. Furthermore, given the existing hardstanding, there is more than sufficient space for vehicular access, manoeuvring and parking.

5.11 Policy E3 is in relation to *Warehousing, Storage and Distribution, and Haulage Depots*. The policy states that:

***Favourable consideration will be given to applications for warehousing, storage and distribution on the sites allocated for such purposes in the Local Plan,...***

***Throughout the remainder of the plan area, warehousing and haulage depots, including proposals for container compounds and handling areas, will be considered on their merits and with special regard to their relationship to the primary route network.***

***In the countryside such uses will not be permitted where they would cause demonstrable harm to residential or rural amenity, highway safety, or the environment.***

5.12 Given the above, whilst the Site is located within the countryside, the proposal relates to existing buildings on previously developed land. Furthermore, there are already a number of structures and businesses at the airfield.

5.13 The application Site is not located near to any residential properties. The visual impact would be minimal as no alterations to the existing buildings are proposed. From a highway safety perspective, the submitted

Transport Statement confirms that there would be no detrimental harm caused by the proposal, nor would the change of use lead to a significant increase in vehicular movements on the local highway network.

5.14 It has already been established that the Site is located less than 10 minutes from the A14 trunk road, with excellent connectivity to Felixstowe Port, the Midlands, Cambridge and the wider East Anglia region.

5.15 On this basis, it is considered that the Proposed Development complies with adopted Policy E3.

5.16 Policy FC5 of the Core Strategy Focused Review replaces Policy CS11. Relevant to the Proposed Development is the section relating to the Rural Economy which states that:

***In rural areas we will support economic development proposals, including tourism and farm diversification proposals that cannot be more sustainably located closer to existing settlements and where the proposal is restricted in size, scale and type appropriate to a rural setting.***

5.17 In addition, Policy CL17 of the Local Plan has regard to the *Principles for Farm Diversification*. The policy states:

***Notwithstanding the strict controls over development in the countryside, changes of use arising from the diversification of farm enterprises will be permitted subject to the following criteria:-***

- ***There is no materially detrimental effect on nearby residential amenity;***
- ***Proposals should benefit the rural economy by providing alternative or additional employment;***
- ***Proposals are compatible with the protection of the countryside in terms of its landscape, wildlife, natural resources and intrinsic recreational value;***
- ***Proposals do not involve the permanent loss of agricultural land of Grades 1, 2 and 3a of MAFF's agricultural land classification;***
- ***There is no excessive traffic generation or adverse effect on the free flow and safety of traffic;***
- ***The District Planning Authority will expect the proper use to be made of appropriate existing buildings, where proposals require the provision of new workspace;***
- ***Any new building(s) shall be ancillary to and used solely in connection with the use applied for. Such buildings should be kept to the minimum size required to meet the operational needs of the new use and be well related to the existing buildings which are the subject of the proposal. In considering the need for new building(s) the availability of existing farm buildings will be a material consideration.***

5.18 The landowner and proposed operator is an existing agricultural business. As such, notwithstanding that the existing use of the hangars are not agricultural, the Proposed Development represents farm diversification and is thus supported by the Development Plan.

- 5.19 Policies E10 and E11 are also of relevance to this application having regard to the *New Industrial and Commercial Development in the Countryside* and *Re-use and Adaptation of Agricultural and Other Rural Buildings for Industrial and Commercial Use*. The proposed change of use amounts to an effective use of the existing rural buildings and would lead to the creation of new local jobs. There would be a very limited impact in respect to the visual appearance and character of the countryside.
- 5.20 The former airfield structures would not look out of place and would be retained in their present form. Any containers on site or open storage would be kept to a minimum, although it is noted that there is presently areas of open agricultural storage on the airfield.
- 5.21 In terms of external lighting, it is likely that exterior downlights would be utilised. Measures for controlling the lighting could be introduced via a reasonably worded planning condition, such as ensuring that motion sensors are used to ensure that there would be no detrimental impact on nearby residential amenity and outlook, particular during the hours of darkness.
- 5.22 Overall, the formal Pre-Application response (submitted with this application) concluded that the Proposed Development would be acceptable in principle having regard to adopted Policy E11.
- 5.23 Adopted Policy E12 of the Local Plan is in relation to the *General Principles for Location, Design and Layout of Industrial and Commercial Development*. As already established, no physical changes are proposed to the hangars and airfield building with exception of new lighting.
- 5.24 New containers would be placed on site with two provided for each building (six in total). The Policy looks to refuse new containers if they would have 'visually unacceptable' appearance. In this instance, the containers would be located close to the existing buildings in each case to avoid a wider spread of development across the site. They would also be coloured green and not stacked which should reduce any perceived visual impact on the countryside and surrounding landscape. Open storage would be kept to a minimum where possible.
- 5.25 Furthermore, given the distance between the Site and the nearest noise sensitive receptors, it is not considered that the change of use would cause unacceptable levels of noise. No advertisements are proposed for the buildings and in any case would be the subject of a separate application for Advertisement Consent. In respect to landscape features, no existing trees or hedgerows would be removed as part of the proposal. Given the significant existing hardstanding which surrounds the subject buildings, opportunities for new planting are severely limited. Overall, it is considered that the Proposed Development would comply with Policy E12.
- 5.26 Finally, Policies T09 and T10 concern *Parking Standards* and *Highway Consideration in Development*. For parking, the Policy states that details of parking and the manoeuvring of vehicles must be provided in compliance with the adopted parking standards. The adopted standards in this instance are contained within the Suffolk County Council Guidance for Parking Technical Guidance (May 2019).



5.27 The adopted standards for Use Class B8 (Storage and Distribution) are shown below.

Use	Vehicle	Cycle	PTW	Disabled
	Requirement	Minimum	Minimum	Minimum
B8	1 space per 150 m <sup>2</sup>	2 spaces per 400 m <sup>2</sup>	1 space + 1 per 20 car spaces (for 1 <sup>st</sup> 100 car spaces), then 1 space per 30 car spaces (over 100 car spaces).	<b>200 bays or less = 2 bays or 5% of total capacity, whichever is greater, <b>Over 200 bays</b> = 6 bays plus 2% of total Capacity</b>
B8 with retail element	1 space per 150 m <sup>2</sup> + 1 space per 20 m <sup>2</sup> retail area for customer parking			

5.28 The change of use provides up to 9 car parking spaces across the site, well in excess of the minimum requirements. 3 disabled bays and 4 PTW spaces are also provided, along with secure and covered bicycle storage for 8 bicycles. There is also space provided for commercial vehicles to load/unload goods whilst visiting, with sufficient space for them to turn within the Site.

5.29 The proposal is therefore compliant with the adopted standards based on the floorspace for each unit. No retail areas are proposed in any of the units and therefore customer parking is not provided.

5.30 In respect to adopted Policy T10, the Proposed Development would lead to a small increase in vehicular movements during the day. The accompanying Transport Assessment assumes a worst case scenario, but still concludes that the proposal would have an acceptable impact on the local highway network with sufficient existing capacity. Haugh Lane is an existing single track road (with tarmac surface) but benefits from a number of passing places. The Proposed Site Plan submitted demonstrates that there is sufficient space for parking and the manoeuvring of vehicles.

### Emerging Joint Local Plan

5.31 Babergh and Mid Suffolk Councils are currently in the process of preparing a new Joint Local Plan. A new Local Development Scheme 2022 to 2025 (LDS) was issued in October 2022. The LDS indicates a target adoption date of Autumn 2025 for the new Local Plan.

5.32 Given that the Emerging Plan is at a very early stage, it cannot reasonably be afforded any weight in the assessment of this application.

## National Planning Policy

5.33 The NPPF (2021) is an important material consideration in the determination of planning applications. There are certain key elements within the NPPF that are relevant to the determination of this application.

5.34 From the outset the NPPF sets out that the purpose of the planning system is to contribute to the objective of sustainable development (Paragraph 7), with this clarified under three objectives: economic, social and environmental (Paragraph 8).

5.35 The NPPF sets out a presumption in favour of sustainable development at Paragraph 11, which for decision taking means:

**c) *Approving development proposals that accord with an up-to-date development plan without delay; or***

**d) *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.***

5.36 Paragraph 119 of the NPPF calls for planning to promote an effective use of land in meeting the need for homes and other uses, and at Paragraph 120(d) states that development of under-utilised land and buildings should be supported.

5.37 Clearly in this regard, the proposed change of use of the existing buildings on site makes effective use of the floorspace available without the need to erect new buildings.

5.38 Paragraph 111 of the NPPF has regard to highway safety. It says:

***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.***

5.39 The submitted Transport Assessment demonstrates that there would be no adverse impacts on the local highway network by virtue of the limited vehicular movements anticipated. It is not considered that there would be a conflict between vehicles and pedestrians using the PRoW. Furthermore, vehicles are likely to travel at a reduced speed along Haugh Lane. On this basis, the proposal complies with Paragraph 111.



## 6. Summary and Conclusion

- 6.1 The proposals the subject of this Planning Statement comprise the change of use of three existing buildings for commercial storage use (Use Class B8) with associated access and parking.
- 6.2 This submission follows positive pre-application engagement with BMSDC where the principle of development was considered acceptable subject to the submission of further information and supporting documents.
- 6.3 The existing buildings are considered suitable for conversion given their size, construction and condition. The hangars and detached concrete building form part of the wider airfield site where there are a number of other existing buildings and uses including agriculture and storage.
- 6.4 The application is supported by a Transport Assessment and Preliminary Ecological Assessment (PEA) which have both concluded that the proposal would be acceptable in respect to access, highways and ecology.
- 6.5 This Statement has also assessed the scheme against the relevant adopted local and national planning policies and thus demonstrates policy compliance.
- 6.6 Given all of the foregoing, it is respectfully requested that BMSDC grant permission for the change of use proposed.