



SUPPORTING STATEMENT

In respect of an application for the completion and alteration of approved garage/workshop building to form a detached dwelling at:

Broomvale Farm, Bramford Road, Little Blakenham,
Ipswich, Suffolk, IP8 4JU

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1.0 Introduction

1.1 This statement is prepared in support of an application for the completion and alteration of a garage/workshop building to form a new dwelling at Broomvale Farm, Bramford Road, Little Blakenham, IP8 4JU.

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

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



1.4 The building that is the subject of this proposal was granted planning permission in 2002 under application reference 1483/02 as a garage/workshop/studio and was the subject of a second permission in 2016 (ref 4906/16) for the addition of a first floor. The works were commenced and the permission remains extant. This planning history will be considered in detail wherever relevant throughout this statement.

2.0 The Site

2.1 Broomvale Farm lies to the east side of the B1113. In considering a planning application made in 2019 for land to the south of the access to the farm, the Planning Officer described the site as:

“The wider site forms part of Broomvale Farm which operates a farm shop and a business park from it. Broomvale Farm is located some 80 metres to the north of the site. It is listed at Grade II with the following list description:

Farmhouse. C16 core with major alterations of early C19 and early C20. A C19 range has the main entrance front facing south, of 2 storeys and 3 windows. Painted brick. Plaintiled roof with external end chimney. Windows with flat arches of gauged brick; small-pane sashes at upper storey, French windows with louvred shutters at ground storey. 6-panelled entrance door, the upper panels glazed. Reeded architrave and pentice board on slender brackets. A 2-storey C16 range became the rear service wing in C19, but it comprises the original hall and service cell: timber framed and plastered, with some C18 herringbone pargetting in panels. Some good C18 windows on the west elevation, of 3 lights with transomes and iron casements, those at 1st storey with leaded lights. The ground floor window has a pair of boarded shutters. The twin service rooms have good exposed framing of early C16 or possibly C15, partly rebuilt in mid C16 with a roll-moulded bridging joist and chamfered common joists. the hall may also have been rebuilt at this time. A large 2-storey extension of c.1930 to rear”.

2.2 The farmhouse has been sold away from the land which forms this site and also from that which was proposed for the storage of caravans. The land subject to this application lies to the east of the farmhouse and, as detailed above, comprises an area of land upon which permission has been granted for a new building. The works were commenced and the permission remains extant.

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

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

3.0 The Proposal

- 3.1 The proposal is to complete the construction of the approved building and to amend the interior arrangement to facilitate use as a residential dwelling.
- 3.2 The submitted plans demonstrate how the building would operate as a dwelling and confirm that no changes are required to the exterior of the building relative to the previously approved details.

4.0 Planning Policy

- 4.1 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.
- 4.2 The NPPF is supported by the Planning Practice Guidance (PPG), which assists applicants and decision makers in interpretation the NPPF.
- 4.3 The development plan for Mid Suffolk District Council consists of the saved policies of the Mid Suffolk Local Plan (1998), the Core Strategy (2008) and its Focussed Review (2012). The following policies within these documents are considered to be relevant to this proposal.

Mid Suffolk Core Strategy and the Core Strategy Focused Review

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

Mid Suffolk Local Plan 1998

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

4.4 The Council are in the process of taking forward their new local plan, and this will replace the suite of policies listed above. Whilst at this time it is unclear what weight is to be afforded to the emerging policies (the LPA appear to be giving limited weight to these policies, whereas a Planning Inspector considering a recent appeal determined that no weight should be given to them), for the purposes of clarity the following emerging policies may be considered relevant to this proposal:

- SP01 - Housing Needs
- SP03 - The Sustainable Location of New Development
- SP09 - Enhancement and Management of the Environment
- SP10 - Climate Change
- LP01 - Windfall Infill Development Outside Settlement Boundaries
- LP04 – Replacement Dwellings and Conversions
- LP15 - Environmental Protection and Conservation
- LP16 - Biodiversity & Geodiversity
- LP17 - Landscape
- LP19 - The Historic Environment
- LP23 - Sustainable Construction and Design
- LP24 - Design and Residential Amenity
- LP27 - Flood Risk and Vulnerability

4.5 Both the existing and emerging policies will be considered in the 'Planning Considerations' chapter of this statement, wherever relevant to the consideration of this proposal.

5.0 Relevant Planning History

- 5.1 As detailed above, the building that is the subject of this application was approved in 2002 as a garage/workshop and subsequently granted permission to have a first-floor added in 2016.
- 5.2 There is no other recent planning history directly relevant to this proposal.

6.0 Planning Considerations

- 6.1 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”*.
- 6.2 Despite the LPA having, on many occasions, confirmed that their policies are not compliant with the NPPF, in making recent decisions they have sought to argue against that position. It is understood why the Council would wish to maintain a position that their policies are up-to-date, despite the fact that the documents making up their development plan are 14 years and 10 years old respectively and their emerging plan has been significantly delayed again, but to try and do so without due consideration of decisions made at appeal that come to a differing conclusion (and have done so for many years) is not a reasonable position. Indeed, it is to be noted that until the Council became aware that their emerging plan was going to be delayed, they had not previously questioned the out-of-date nature of their policies for many years. There has been no change in circumstances that would mean those policies should suddenly be given elevated weight when they were not previously.
- 6.3 This point was the subject of consideration through a recent appeal (Appeal Ref: APP/W3520/W/22/3291011 - Land South of Mill Road, Wyverstone, IP14 4SE dated 27th April 2023). In reaching a decision to issue a full award of costs against the Council, an Inspector found that:

“4. The Council in its evidence reversed a previously accepted position that its locational policies, in particular CS1 and CS2 of the Core Strategy (September 2008) were out-of-date, having been found so at appeal in 2019 (APP/W3520/W/18/3194926). It also sought to

distinguish the current appeal from others by pointing to differences in its housing land supply position at the time, and to the cumulative effect of these schemes in terms of creating an unsustainable pattern of development.

5. The sites in question are immediately opposite the appeal site, and therefore of no material difference to the appeal site in terms of the distance to the nearest services. The Council failed to explain this inconsistency with its previous decisions where it took a supportive position on accessibility. These were material considerations to which the Council failed to have proper regard.

6. In addition, the Council set aside its previous acceptance that certain development plan policies were out-of-date, stating in its Statement of Case that ‘The current adopted local policies used to determine this application are fit for purpose [...] and do not conflict with the NPPF (July 2021).’ These policies were found to be out-of-date on the basis of inconsistency with the Framework, rather than solely by reason of a lack of a five year housing land supply. As such, this inconsistency still holds, regardless of the Council’s improved housing position, and there was no cogent argument advanced by the Council for its complete reversal of position in this respect. The Council also asserted the site was ‘isolated’ in terms of the Framework, contrary to the position established by the Court of Appeal in Braintree¹ and ignoring the several other dwellings close to the site on Mill Lane.

7. Ultimately, the Council’s evidence amounts to brief, vague assertions of generalised concerns regarding cumulative impact which were not supported by substantive evidence of excessive levels of development in the countryside or resultant harm. Moreover, it failed to take into account relevant material considerations or satisfactorily explain its departure from previous positions in terms of accessibility and the status of relevant development plan policies. This constitutes unreasonable behaviour contrary to the basic guidance of the PPG and the applicant has been faced with the unnecessary expense of contesting the first main issue of the appeal”.

6.4 The Council’s policies are out-of-date. The above decision confirms policies CS1 and CS2 remain out-of-date and the unsubstantiated attempts by the Council to alter this position are unjustified. As policy H7 has also been found to be out-of-date, along with aspects of policy

CS5, it is clear that the suite of policies relating to rural housing cannot be relied upon as reason to refuse planning permission as a matter of principle.

- 6.5 The NPPF takes a more flexible approach NPPF to new development in the countryside than the manner in which the development plan approaches such proposals, and this proposal should thereby be considered in light of the three objectives of sustainable development (economic, social and environmental) set out in paragraph 8 of the NPPF. For these reasons, in taking a decision on the proposal, the LPA should grant 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”.*

- 6.6 The site lies within a cluster of properties in the countryside. Paragraph 78 of the NPPF identifies that:

“78. In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this”.

- 6.7 At paragraph 79, the NPPF states that:

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby”.

- 6.8 Paragraph 80 of the NPPF identifies that:

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

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

b) the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;

c) the development would re-use redundant or disused buildings and enhance its immediate setting;

d) the development would involve the subdivision of an existing residential building; or

e) the design is of exceptional quality, in that it:

- is truly outstanding or innovative, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and

- would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area”.

6.9 The site is located within a significant cluster of buildings, including residential properties and the adjacent business park. It is in close proximity to the main road and to the A14, and there are footways along the roadside that enable ready access to the bus stops (which lie a short distance to the south on the B1113) which provide frequent services to Ipswich and local villages.

6.10 The road is well used by cyclists and access to Claydon and Bramford, with the extensive facilities they both offer, is within easy cycling distance such that the site offers a wide variety of transportation methods. The site cannot, therefore, be considered to be isolated in the terms envisaged by the NPF and, in reality, is in a very accessible position for a rural location. The proposal would, therefore, support the aims of paragraph 79 which seeks to locate new dwellings where they would support rural services and have access to them without reliance on use of private car travel.

6.11 The principle of development is, therefore, acceptable here.

Design and Layout

- 6.12 Paragraph 126 of the NPPF identifies that *“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process”*.
- 6.13 Paragraph 130 of the NPPF also seeks to ensure that planning policies and decisions ensure that development will function well and add to the overall quality of the area; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to local character and history, including the surrounding built environment and landscape setting; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks.
- 6.14 Policies GP1, H13 and H15 provide the development plan provision that seeks to ensure good quality design and that new dwellings reflect local distinctiveness and are appropriate to their setting. Emerging policy LP24 provides further criteria by which new development proposals will be considered.
- 6.15 The design, appearance, layout and scale of this building have already been approved. That building has been lawfully commenced and can be constructed without further approval from the LPA. It’s impacts, therefore, in terms of the scale and visual impact, have already been considered appropriate, such that it is only the change in the use of the building that requires consideration here.
- 6.16 The occupation of the building as a domestic residence would not give rise to any specific concerns with regards to any notable change in the character of the building relative to the surrounding area. Adjacent buildings comprise a range of commercial, residential and agricultural structures and uses, and the dwelling is sited to be read in conjunction with the

cluster of buildings adjacent. It would not intrude into the surroundings, nor would it give rise to a building that would sit uncomfortably with the adjacent uses (again, the building has permission already).

6.17 The submitted plans confirm that the dwelling would be provided with dedicated amenity space and with associated parking and turning provision. By virtue of the existing land levels, there would also be negligible impacts on the surrounding landscape. The proposed dwelling would not intrude into views of the countryside, being set against adjacent development. It would not be visible from the main road. The new dwelling would, therefore, be seen only in the context of the existing buildings along the road.

6.18 The approach taken here would be, therefore, in accordance with the principles of good design set out in the NPPF and thereby also complies with policies GP1, H13 and H15.

Heritage Impacts

6.19 The proposal does not engage any heritage issues. Whilst adjacent to the listed farmhouse, the building already has permission to be constructed and there are no impacts on the setting of the farmhouse resulting from the proposed use. As such, development of the site is not considered to give rise to any material impact on the respective settings of these heritage assets and, as such, the proposal does not engage the provisions of paragraphs 201 and 202 of the NPPF.

Highways Access, Parking and Safety

6.20 The site benefits from an established access to the B1113. The images below show that access looking north (top image) and south (bottom image) respectively.



- 6.21 The visibility from this access is well beyond the splay requirements set out in DMRB standards and is, therefore, fully compliant with the Local Highway Authority requirements.
- 6.22 Onsite parking and turning provision is available within the areas adjacent to the dwelling so as to ensure that the site can accommodate all of the vehicular parking and manoeuvring space and not impinge upon adjacent uses/users.
- 6.23 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. According to www.crashmap.co.uk, vehicular crash data reveals that within the last 20 years, the road outside the site has not been subject to any form of vehicular collision. Therefore, there is

nothing to suggest that the use of the access would be unsafe, and this can be delivered in a manner that would be safe and suitable for all users.

Residential Amenity

- 6.24 Paragraph 130 of the NPPF also holds regard to the protection and preservation of residential amenity, which the scheme wholly delivers. Whilst nobody has a right to keep the existing view from their home, the applicants acknowledge that the LPA will consider the effect the land use may have on the outlook from principal windows of neighbouring property. The scheme would not result in undue intrusion into the domestic enjoyment of neighbouring dwellings given the spacing which exists.
- 6.25 Given the nature and extent of the proposed use, it is unlikely that the resultant domestic use would present issue (for example, to privacy, overlooking, outlook, noise, smell, light, pollution, daylight or sunlight) extending above and beyond the established nature of the area.
- 6.26 The proposal would not, therefore, give rise to detrimental impacts to residential amenity, and complies with policies LP24 and H16.

Ecology and Biodiversity

- 6.27 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*". 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
- 6.28 There is permission to construct the very same building on this site. There is no change to the physical structure proposed and the land is maintained land that is mowed regularly. The application offers opportunities to secure biodiversity enhancements in the form of log piles,

new native landscape planting and bird boxes such as to secure an uplift in biodiversity on the site.

- 6.29 There are, therefore, no ecological impacts that would weigh against this proposal, and the proposal complies with emerging policy LP16.

Flood and Water

- 6.30 The site is within Flood Zone 1 and therefore not liable to flood risk.
- 6.31 Furthermore, the land can accommodate appropriate drainage solutions to serve the proposed dwelling.

Land Contamination

- 6.32 The applicant has provided a Groundsure Homescreen Report and the Council's Land Contamination Questionnaire which demonstrate that the proposal is not at risk from contamination.
- 6.33 The proposal thereby accords with the requirements of paragraph 183 of the NPPF which requires that planning policies and decisions should ensure that *"a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation)"*.

Efficient Use of Land

- 6.34 Paragraph 119 of the NPPF states that:

"Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for

accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land".

6.35 Paragraph 124 of the NPPF identifies that planning policies and decisions should support development that makes efficient use of land, taking into account, inter alia:

- the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change, and;
- the importance of securing well-designed, attractive and healthy places.

6.36 Paragraph 125 takes this position further, identifying that local planning authorities should refuse applications which *"they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)".*

6.37 The layout of the proposal, along with the quantum of development brought forward, has taken full account of the character of the site whilst making efficient use of the land. The detailed design ensures that a viable and deliverable scheme will be brought forward that comprehensively addresses the use of all of the land.

6.38 The site can accommodate a dwelling of the proportions indicated with no detriment to the character of the area or neighbouring amenity. The proposal would, therefore, make the most efficient use of land in line with the aims of paragraphs 124 and 125 of the NPPF.

Sustainable Development

6.39 From an economic aspect, the construction of a new dwelling would provide much needed jobs for local people, and there would be a modest economic benefit from the purchase of materials also. Occupants of the property would contribute to the local economy through the

purchase of goods, employment and involvement in community activity. It is, therefore, considered that the economic objective of sustainable development is met by this proposal.

- 6.40 The social aspects of new housing are embedded in the NPPF which states that the social objective seeks *“to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being”*.
- 6.41 Notwithstanding that a proposal in this location would contribute to enhancing and maintaining services in this village and neighbouring areas, including Claydon, Bramford and Greta Blakenham, the PPG advises that *“all settlements can play a role in delivering sustainable development in rural areas”*, cross-referencing to NPPF 80, *“and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided....”*. Moreover, in rural areas, where public transport is limited, people may have to travel by car to a village or town to access services.
- 6.42 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.
- 6.43 The delivery of a new dwelling to the market would both help to meet housing need in the locality and would boost the supply of housing as required by the NPPF. As such, it is considered that the proposal meets the social objective of sustainable development. Furthermore, the proposal’s contribution to the Council’s housing supply should not be underestimated. The applicant intends to carry out the development in a short timescale

should permission be granted. In this regard, the site should be considered deliverable in the terms set out in the NPPF and should thereby be afforded further weight in terms of its sustainability credentials.

- 6.44 With regards to the environmental elements of the proposal, the proposed dwelling would be built to current Building Regulations standards and would provide an environmentally sustainable development through the incorporation of renewable energy provision, the use of sustainable construction techniques, the utilisation of water efficient taps, showers and toilets, and energy efficient white goods. Electric car charging provision will also be provided.
- 6.45 Biodiversity improvements can be delivered in terms of the provision of log piles, swift bricks and bird boxes on the site which will actively encourage biodiversity on the land. This will be supported by new native landscape planting. With this in mind, the proposal is considered to offer environmental gains that would support the environmental objective of sustainable development.
- 6.46 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.

7.0 Planning Balance

- 7.1 The proposal seeks permission for the conversion of the existing building on the site to form a new dwelling.
- 7.2 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990, applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The consideration is, therefore, whether the development accords with the development plan and, if not, whether there are material considerations that would indicate a decision should be taken contrary to the development plan.

- 7.3 The development plan includes the Mid Suffolk Core Strategy (2008) and its Focussed Review (2012) and the saved policies in the Mid Suffolk Local Plan (1998). The emerging Joint Local Plan is also starting to be given weight in the decision making process. In accordance with paragraph 79 of the NPPF and policy H9 of the Mid Suffolk Local Plan, the proposal seeks to make reuse of an existing building in the countryside where there can be no ‘in-principle’ objection to the proposed use.
- 7.4 The material considerations that are relative to the determination of this application have been satisfactorily addressed (including design and layout, highway safety, biodiversity, land contamination, and residential amenity) such that they have been found to comply with the provisions of the NPPF and the relevant development plan policies.
- 7.5 One of the main issues is, therefore, the impact on heritage assets given the listed status of adjacent properties and the comments made within the previous application on the site. It has been found that the site is not attached to any of the adjacent properties and that the construction of the building has already been found to be acceptable. There would not be any direct impacts on heritage assets resulting from this proposal that would give rise to harm to these heritage assets, such that the proposal is also found to comply with the NPPF and policy HB1 in this regard.
- 7.6 As such, the proposal is found to be a sustainable development and the LPA is requested to support this proposal and enable the reuse of these buildings in the manner set out in this application.