



**WILKINSON**  
PLANNING

## Planning Statement

SITE

Parsonage Green Farm, Cockfield, Bury St  
Edmunds, Suffolk, IP30 0HB

PROPOSAL FOR

Change of use of agricultural building to  
(light industrial (Class E))

PROPOSAL BY

Mr P Beales

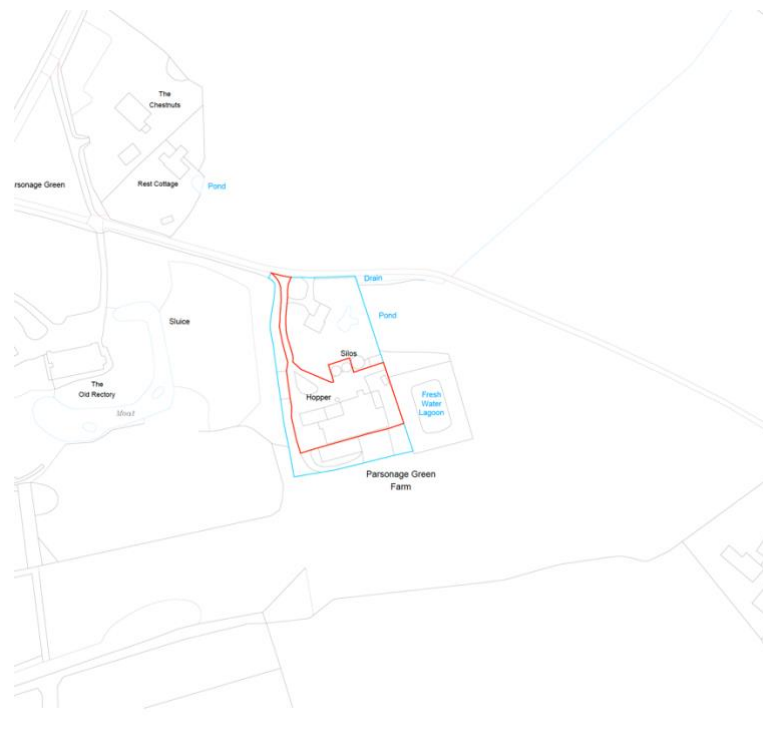
November 2023

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## 1.0 Introduction

- 1.1 This statement is prepared on behalf of Mr P Beales in respect of an application for; Change of use of agricultural building to light industrial (Class E) at Parsonage Green Farm, Cockfield, Bury St Edmunds, Suffolk, IP30 0HB.
- 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** Site Location Plan

## 2.0 Site and Surrounding Area

- 2.1 The application site comprises of an existing agricultural building which has long been associated with Parsonage Green Farm, Cockfield. The site is located in spacious countryside surroundings, close to the settlement of Cockfield. Within the site, areas of hardstanding provide access and parking, all within the curtilage of the host dwelling. Agricultural land is

located to the east and south of the site. To the west is The Old Rectory (Grade II) which is screened by a matured hedgerow and treeline. To the north is Rest Cottage (Grade II), delineated by an access road.

2.2 The site is not within a Conservation Area and does not comprise of any listed buildings, although The Old Rectory (Grade II) is situated directly west of the site. The site is the within Flood Zone 1 and is at a very low risk of pluvial flooding. There are no protected trees on site. There is a Public Right of Way (PROW) (footpath) running along the northeast boundary of the site.

### 3.0 Proposal

3.1 The proposal is for; Change of use of agricultural building to light industrial (Class E). The proposed plans provide context:



**Figure 3.1.1 - Proposed Site Plan**

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

- Application Forms
- Planning Drawings
- Planning Statement
- Acoustic Report
- Ecology Report
- Bat Survey
- Heritage Statement

## 4.0 Planning Policy

- 4.1 The National Planning Policy Framework 2023 (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.
- 4.2 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.
- 4.3 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 or adopted Neighbourhood Plan.
- 4.5 In the circumstances of this application, the Development Plan for the Babergh district comprises the Core Strategy (2014) and the saved policies of the Local Plan (2006). However, on 19<sup>th</sup> September 2023 the Inspectors for the emerging Joint Local Plan concluded their examination and found that plan to be sound subject to modifications. It is understood that the modified Joint Local Plan is due to be considered for adoption in November 2023. On that basis it is the policies of that plan that have been assessed for the purposes of this application

and Statement, recognising that, in all likelihood, the new plan will have been adopted before this application is determined.

4.6 The most relevant policies for the determination of the application, following the Joint Local Plan, are as follows:

Joint Local Plan (2023)

- SP03: The sustainable location of new development
- LP09: Supporting a Prosperous Economy
- LP15: Environmental Protection of Conservation
- LP16: Biodiversity and Geodiversity
- LP19: The Historic Environment
- LP23: Sustainable Construction and Design
- LP24: Design and Residential Amenity
- LP29: Safe, Sustainable and Active Transport

Supplementary Planning Guidance

- Suffolk Adopted Parking Standards (2019)
- Suffolk Design Guide (2000)

National Planning Policy Framework (2023)

- Para 7: Achieving sustainable development
- Para 8: Three objectives to sustainable development
- Para 10: Presumption in favour of sustainable development
- Para 11 – 14: The presumption in favour of sustainable development
- Para 38: Decision making
- Para 47 – 50: Determination of planning applications
- Para 126 – 136: Achieving well designed places
- Paras 189 – 208: Conserving and enhancing the historic environment

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

## 5.0 Planning History



5.1 The application follows on from planning application reference DC/23/02056 which was withdrawn, due to concerns relating to heritage and bats. It is necessary to summarise the consultee responses from that application:

Highways – no objection

Environmental Health (Noise / Light / Odour / Smoke) – no objection

Environmental Health (Land Contamination) – no objection

Heritage – heritage impact assessment required (enclosed)

Ecology – bat survey required (enclosed)

5.2 The application hereby supported is supported by heritage and bat information, alongside the plans and reports which were previously supported by statutory consultees.

## 6.0 Material Planning Considerations

### 6.1 Principle of Development

6.2 Following the submission of DC/23/02056, it is overtly evident that the Council did not find issue with the principle of development, and that the circumstances surrounding this application remain unaltered, despite the inception of the new JLP.

6.3 The JLP is supportive of economic prosperity, stating at paragraph 14.03:

*“The Plan also provides flexibility to support small scale employment use and flexible working practices. The predominantly rural nature of the Districts means that there are many small scale businesses, often within agricultural complexes and also within residential curtilages in both the towns and the wider countryside. This is an important component of the Districts’ economic sustainability and diversity.”*

6.4 The proposal offers suitable use within a former agricultural complex, and is aligned with the economic thrust of the JLP, which includes support for rural enterprise. The proposal speaks incredibly well to core policy in this regard, and is underpinned by an appeal recovered by the Secretary of State (ref: M&S, London<sup>1</sup>) which states:

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<sup>1</sup> APP/X5990/V/3301508

*“there should generally be a strong presumption in favour of repurposing and reusing buildings”.*

## 6.5 Heritage

6.6 Section 66(1) of the listed buildings Act states that in considering whether to grant planning permission for development which affects a listed building or its setting, the decision taker shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest that it possesses. A similar provision is found at s72(1) in relation to the preservation of the character and appearance of conservation areas.

6.7 The effect of those statutory provisions is that the desirability of preserving the setting of a listed building (or character/appearance of a conservation area) must be treated as a matter of ‘considerable importance and weight’, with such duties regarded as presenting a ‘strong presumption’ against a grant of planning permission where harm to a designated heritage asset is identified<sup>2</sup>. In decision-making, the ‘great weight’ to be afforded to the conservation of heritage assets described in the NPPF is synonymous with the ‘considerable importance and weight’ of the s.66 duty.<sup>3</sup> Policy LP19 of the JLP largely replicates and is consistent with the various policy paragraphs comprising chapter 16 of the NPPF.

6.8 In this case there are two designated heritage assets that warrant consideration: as set out in the accompanying heritage report.

6.9 It follows that the development would not erode the significance of The Old Rectory by any degree and thus it is not harmful. Likewise, the scale, form, and detailed design would ensure that the character and appearance of the asset would be preserved. Overall, no harm is posed to any heritage asset and therefore the duties of the listed buildings Act and the policies of the JLP and NPPF would be complied with.

## 6.10 Design and Layout

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<sup>2</sup> *South Lakeland District Council v Secretary of State for the Environment and Another [1992] 2 AC 141; R (Barnwell Manor Wind Energy Ltd) v East Northamptonshire DC [2014] EWCA Civ 137.*

<sup>3</sup> *Jones v Mordue [2015] EWCA Civ 1243.*



- 6.11 Policy LP24 and paragraph 130 of the NPPF seek to ensure that development achieves a high-quality design, which is responsive and sympathetic to its surroundings.
- 6.12 For reasons similar to those above, the proposed change of use and associated alterations are sensitively designed to preserve the existing character and appearance of the site and wider area, particularly having regard to the historic environs thereabouts. To that extent the building is of a high standard and would in any event be largely imperceptible from the public realm recognising its existing and historic usage. The overall effect on the visual amenity of the area would be nugatory and certainly not harmful.
- 6.13 The proposal is therefore acceptable in this regard.
- 6.14 Residential Amenity
- 6.15 Policy LP24 and paragraph 130 of the NPPF seek to protect existing residential amenity but no issues arise in this respect: by virtue of the scale, form, and detailed design, of the building and its siting, there would be no material impact on neighbouring occupiers or any constraint to the existing amenity afforded to the occupiers of the host dwelling.
- 6.16 The acoustic assessment provided by the applicant in support of this proposal demonstrates the acceptability of the scheme, which in turn was also supported by the Council last time out.
- 6.17 Highways
- 6.18 The parking provision would be provided in accordance with SCC Parking Guidance (2019) and would not in any event frustrate the more than adequate turning and manoeuvring space within the rest of the plot, off the highway. No other impacts arise recognising the existing lawful use of the site; no amendments to the existing access are proposed.
- 6.19 The application therefore accords with the policies of the JLP (notably LP29) and the NPPF, including paragraphs 110 and 111.
- 6.20 Sustainability



- 6.21 In accordance with policy LP23 sustainable construction methods will be adopted wherever possible and this includes considerate building practices and the minimisation of waste (hence the reuse of the existing building). The Applicant has also paid regard to wider matters of sustainability and its three objectives – the benefits are modest but no less important.
- 6.22 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 proposal 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.
- 6.23 Socially, the proposal yields positive benefits through the creation of a healthy and functionally sound unit 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 the town, as well as more rural areas, whilst offering proportionately scaled 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.
- 6.24 Environmentally, the site is surrounded by similar uses. The proposal does not offer a materially harmful character area or residential amenity intrusion. There are no demonstrable heritage or trees impacts which result in adverse harm worthy of refusal. The developable form would remain largely unaltered in its appearance. The performance of the unit 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.
- 6.25 The proposal reflects the essence of paragraph 8 of the NPPF, and is therefore considered economically, socially, and environmentally sustainable.
- 6.26 Ecology and Biodiversity

6.27 The site presents no ecological concern on site, but the applicant acknowledges their duty to adhere to the Habitat Regulations 2017. The application can secure modest but positive gains to biodiversity through its planting proposals and the building can incorporate bee/bat/bird boxes within its construction. The application would accord with policy LP16 in that regard.

## 7.0 Planning Balance

7.1 The proposal seeks planning permission for; Change of use of agricultural building to light industrial (Class E).

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

7.3 The development finds in-principle favour with the development plan (taken to be the JLP in light of its imminent adoption) and accords with it when viewed as a whole; it should be permitted without delay. Furthermore, the development would comply with the policies of the NPPF taken as a whole and this reinforces the direction of the development plan to grant planning permission.

7.4 As concluded by this statement, there are no technical reasons to refuse planning permission and there are no barriers preventing the site from delivery, especially noting the existing nature of the site. As this statement has demonstrated this proposal is clearly supported at a local and national level:

Benefit	Weight
<b>Social</b>	
Direct job creation Indirect job creation High quality work space	Substantial
Increase in social cohesion	Significant
<b>Economic</b>	
Increased spending power generated by the development Business Rates Creation of jobs directly, indirectly and throughout supply chain Increase in supply chain services Increase in construction employment before, during and after development	Significant
<b>Environmental</b>	

Landscape improvements Effective reuse of land	Significant
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**Figure 7.4.1** Public benefits

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.