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Document Title: Planning Statement

Application Reference 141

Prepared for Client: Donald Byford Farm Trust

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**CPS Reference:** 141  
**Local Authority:** Babergh and Mid Suffolk  
**Development Description:** Change of use from Agricultural to Light Industrial (Class E1)  
**Site Address:** Rookery Farm, Lavenham Road, Acton, Sudbury, CO10 0BJ  
**Report Revision:** 1

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## 1.0 Introduction.

- 1.1. This planning statement has been written to support the submission of a planning application for the change of use of the site from agricultural to Light Industrial (use Class E).
- 1.2. The proposed hours of access for the site are between the hours of 08:00 - 18:00 Monday – Friday, and 09:00 to 16:00 Saturdays, and 10:00 to 16:00 Sundays.

## 2.0 Site Characteristics

- 2.1. The site is located to the north of Melford Road, Acton with access provided from that road. To the south, west and north of the site are agricultural fields. To the east of the site is a dwelling known as Rookery Farm House.
- 2.2. The site consists of an existing area of hard standing which provides access and parking areas for the site. The red line for the site extends to approximately 2714.90 square metres, as illustrated in figure F1.0 below, and includes two buildings.



*Figure F1.0 Red line extents of the site.*

- 2.3. The images in figure F2.0 overleaf detail the site in its current form.



Figure F2.0 Photos detailing the site.

- 2.5 The proposal is for the change of use of part of the site from agricultural to Light industrial which forms part of use class E. As illustrated in figure F3.0 below the extents of the change of use would be limited to the area within the red line. The land within the blue lined areas would remain in agricultural use. The building labelled “1” is proposed as the main location for the Class E use, and the building labelled “2” is proposed to be used for as a covered parking area with the option of using the two garages at the eastern end for storage.



*Figure F3.0 illustrating the extents of the change of use on site, and the specific uses of the buildings on the site.*

- 2.6 The approximate dimensions of those buildings are as follows -

Building labelled 1 (ridgeline orientated north south) dimensions are –

Length: 41.73m  
 Height: 2.7m at eaves  
 4.53m at ridge  
 Width: 18.17m

Building labelled 2 (ridgeline orientated east west) dimensions are –

Length: 42.0m  
 Height: 2.0m at eaves  
 3.0m at ridge  
 Width: 10.0m

### 3.0 Heritage Assets

- 3.1 In accordance with paragraph 194 of the NPPF, which details the requirement that as part of applications the historic buildings register is used to ensure that heritage assets that may be affected by the proposal are identified, the relevant assets have been identified below.
- 3.2 From that assessment it is apparent that there is one listed building approximately 60m to the east of the site, which is also accessed from Melford Road, another approximately 500m south east of the site. Between the listed building to the east of the site and the site is a boundary wall approximately 3.5metres in height and agricultural an agricultural building that does not form part of the application as detailed on figure F4.0 overleaf. It is reasonable to consider that the proposal would not have any effects on the character of that heritage asset. Furthermore, it can be considered that the proposal would not create negative impacts on the setting because of the existing pattern of development and that the proposal would forms a continuation of use that is not dissimilar to those which already take place on site.

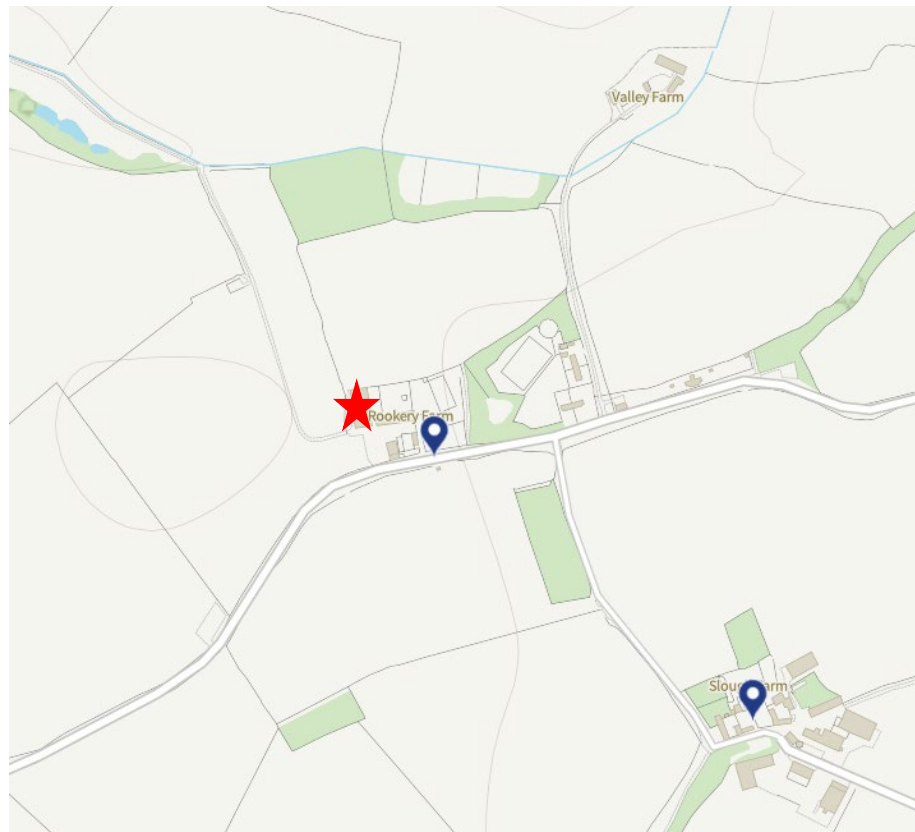


Figure F4.0 Location of nearest Heritage Asset to the site on Melford Road, denoted by blue roundel, site highlighted by red star. (Historic England mapping).

- 3.3 Details of those Heritage assets taken from the historic records held by Historic England are included in appendix 1 which can be found at the end of this document. Those heritage assets located to the west of the site have been included for completeness.

## 4.0 Relevant Planning Policy.

4.1 Relevant local planning policies are -

### **Babergh Core Strategy (2014):**

- CS01 –Presumption in Favour of Sustainable Development in Babergh
- CS02 – Settlement Pattern Policy
- CS03 – Strategy for Growth and Development
- CS15 – Implementing Sustainable Development in Babergh
- CS17 – The Rural Economy

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

- CN01 – Design Standards
- EM01 – Employment Related Development
- TP15 – Parking Standards

4.2 Relevant National Policy can be found in -

- National Planning Policy Framework 2023 (NPPF)
- National Planning Practice Guidance (NPPG)

## 5.0 Principle of development.

3.4 The application site is located south west of Lavenham, on Melford Road. For planning policy purposes the site is located in the countryside. The proposal is for the change of use of the site from agricultural to Light Industrial (Class E). Local planning policy CS02 provides a hierarchy for development, directing it as part of a strategy to create sustainable levels of growth, providing a presumption in favour of sustainable development.

3.5 Within the Babergh Core Strategy (2014) it is stated that “*The Council does not believe that there are compelling reasons to stifle or impede economic growth in its area overall. In very simple terms, we wish to make it clear that Babergh is ‘open for business’.*” Further support is provided by the NPPF in paragraph 11 which sets out the presumption in favour of sustainable development as a core of national planning policy.

5.1 The proposal is for the change of use of the site from agricultural to Light Industrial (Class E), which could be considered in planning terms to be located in the countryside. However, within the Babergh Core Strategy (2014) it is stated that “*The Council does not believe that there are compelling reasons to stifle or impede economic growth in its area overall. In very simple terms, we wish to make it clear that Babergh is ‘open for business’.*”



- 5.2 Noting the countryside position of the site, policy CS03 – Strategy for Growth and Development forms part of the framework for objective 2 of the Core Strategy which seeks to “...*support economic growth and prosperity, building on the strengths of the local economy, including strengthening the role of the rural economy.*” Within policy CS03 support is provided specifically for proposals that contribute to farm diversification.
- 5.3 As part of considerations policy CS15 details how proposals should demonstrate how the proposal contributes to meeting the objectives of the Local Plan, demonstrating the principles of sustainable development and the presumption in favour of sustainable development.
- 5.4 This support works alongside policy CS17: The Rural Economy which details the importance of historic villages, such as Lavenham and Long Melford playing a role in tourism and leisure, and appropriate new development that supports this role will be encouraged. Again this policy details support for the diversification of farms, the re-use of redundant buildings, and promotion of rural businesses.
- 5.5 It is not unreasonable to suggest that the provision of a suitable level of employment in this location would support the local economy and its services, facilities and amenities. Meaning support for the proposal is triggered through criterion iii of planning policy CS15.

## **6.0 Character and Appearance of Area**

- 6.1 No external changes to the existing site are proposed, only the change of use for part of the site. Policy CN01 and the NPPF seek to steer developments to achieve good levels of design. Given the nature of the use, and the existing infrastructure in place, the level of design should be considered within the utilitarian nature of the proposed use, which in itself is not alien within countryside settings.

## **7.0 Flood Risk**

- 7.1 Using the objectives as set out in the NPPF, this Flood Risk Assessment has been created so that it is appropriate to the scale and nature of the development and the risks involved.
- 7.2 As detailed above the site is less than one hectare in area and is situated in flood zone 1 (low risk) as shown in figure F5.0 overleaf, using the nearest post code CO10 0BJ. From assessment of Environment Agency mapping the site is location within Flood Zone 1 which has a low probability of flooding as defined in the NPPG.

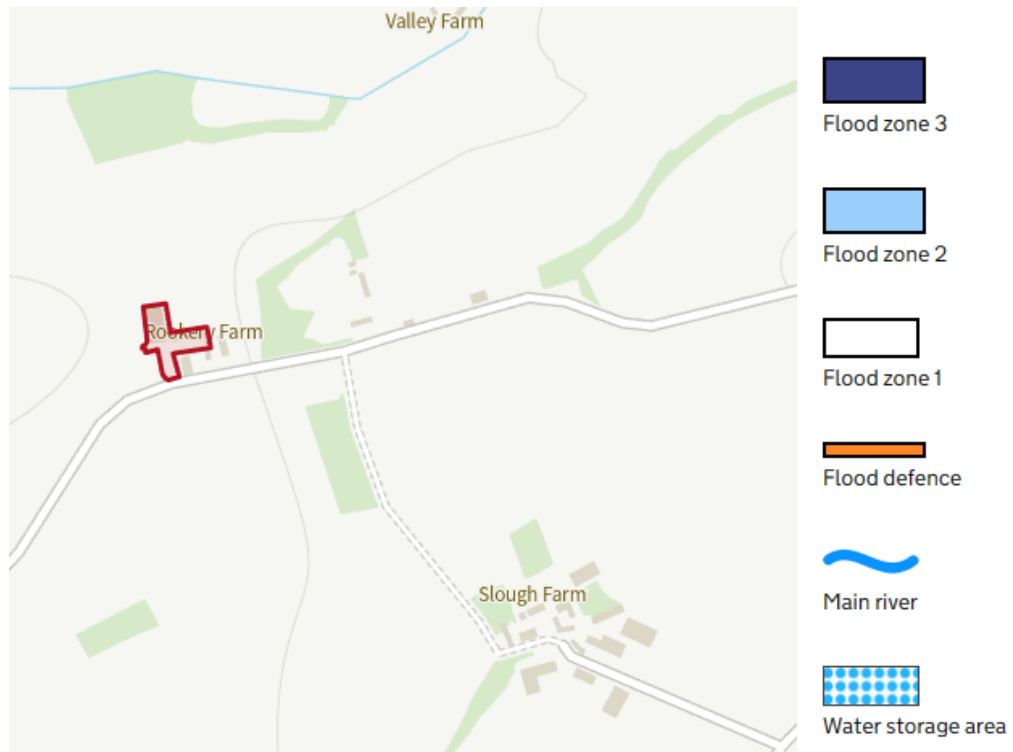


Figure F5.0 Environment Agency mapping detailing that the site is situated in flood zone 1 (low risk), the site is outlined in red.

7.3 Using the Flood risk vulnerability classifications as detailed in the NPPG, the proposal falls within the definition of buildings used for general industry, storage and distribution. That definition is classified as Less Vulnerable, and as defined in NPPG table 2 as shown in figure F6.0 below results in the land use being appropriate for Flood Zone. As such the need to apply Sequential and Exception Tests is not triggered.

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	X	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	X	X	X	✓ *

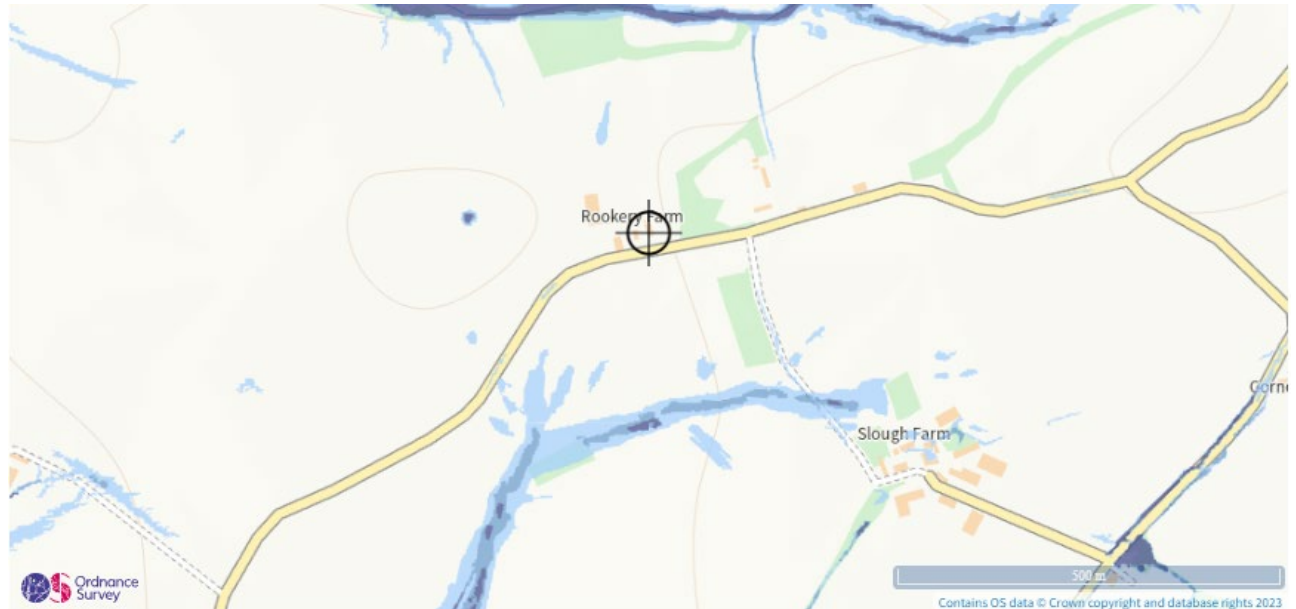
Key:

✓ Exception test is not required

X Development should not be permitted

Figure F6.0 NPPG table 2 details the proposed use is classified as Less Vulnerable.

- 7.4 From assessment of the Environment Agency Surface Water mapping, the site has a Very Low susceptibility to Surface Water Flooding.
- 7.5 No surface water flow paths are located close to or near the site. Figure F7.0 below details the extents and locations of surface water flooding.



Extent of flooding from surface water

[High](#)
 [Medium](#)
 [Low](#)
 [Very low](#)

+
+
+
+
 [Location you selected](#)

*Figure F7.0 indicating surface water flooding extents and locations.*

- 7.6 The proposal is achieved through the change of use of an existing building that is located within an existing area of hardstanding, and it is reasonable to consider that the proposal would not alter any flow paths across the site if they existed.
- 7.7 Therefore, the risks posed can be considered as low. In addition, the site can be considered at low risk of flooding from all other sources.
- 7.8 The site will continue to drain naturally with no increases in runoff resulting from the proposed change of use for the site.
- 7.9 Ultimately the future use and occupants from this proposal would be at a low risk of flooding, and can be considered to accord with the NPPF and the NPPG. Furthermore, the proposal accords with the recommendations of policy CS15, demonstrating that flood risk from all sources has been appropriately managed.

## 8.0 Noise and Neighbour Amenity

- 8.1 The nearest residential properties to the site are approximately 60m to the east. It is reasonable to consider that the use of the site would not create significant negative impacts on neighbouring amenities.
- 8.2 As demonstrated by the noise assessment that is submitted as part of this planning application the proposal can operate so as to achieve a protective sound rating level of 40 dBA LAeq 1hr during the daytime at the nearest residential receptor, resulting from a worst-case cumulative operation of the proposal.
- 8.3 The following wording is suggested for a condition to ensure those noise levels are achieved, *“The cumulative rating level of noise emitted by the site shall not exceed 40 dB LAeq 1hr as a rating level during daytime hours. The noise levels shall be determined at the nearest noise sensitive property. The measurement and assessment shall be made according to BS 4142:2014.”*
- 8.4 Given this rating and condition the proposal can therefore operate with negligible impact from sound at the nearest noise sensitive receptor.
- 8.5 It is not unreasonable to conclude that the proposal does not result in an intensive use for the site, and its operation does not create significant amounts of noise. The proposal can, therefore, be considered to accord with local policy CN01 and paragraph 126 of the NPPF, which detail design principles for proposals and recommend that proposals should protect the health and amenity of occupiers and surrounding uses from development that would create unacceptable impacts such as noise.

## 9.0 Ecology

- 9.1 The site consists of buildings and a concrete pad used for the storage of agricultural produce and the manoeuvring of machinery, by its very nature the site has very little ecological and biodiversity value.
- 9.2 As demonstrated by the Preliminary Ecological Assessment submitted as part of this planning application no further surveys or mitigation are required in regard to national and international designated sites, and County Wildlife Sites, because the site does not lie within potential areas of influence.
- 9.3 At an individual species level 2 bat boxes have been suggested, alongside a single house sparrow bird box. The boxes are proposed to be installed on the larger most northerly building (labelled “1” as detailed in figure F3.0), the locations on the building are detailed in figure F8.0 overleaf.

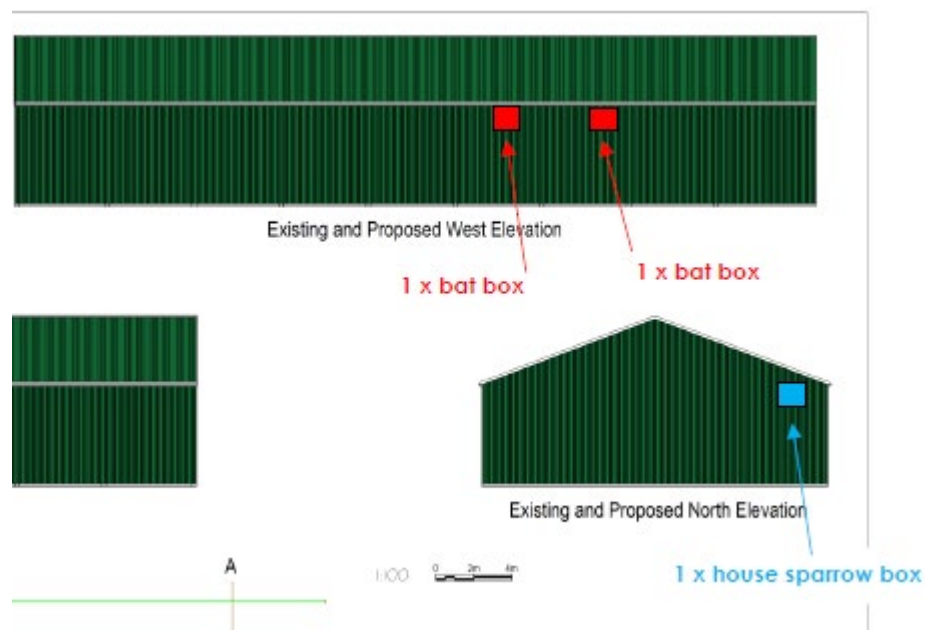


Figure F8.0 locations of proposed bird and bat boxes.

- 9.4 Accordingly, it is reasonable to consider that the proposal accords with paragraphs 174 and 180 of the NPPF which seek to maintain, enhance, restore, or provide biodiversity gains. In addition as detailed in this report, if it is required, further landscaping and planting could provide opportunities to enhance the area.

## 10.0 Impact on Trees subject to Tree Preservation Orders.

- 10.1 There are no trees near the site that are subject to Tree Preservation Orders. Furthermore, considering the extents and characteristics of the site, such as the existing surface treatment, it can be reasonably considered that no development would occur within Root Protection Areas of trees.

## 11.0 Transport, Parking and Highway Safety

- 11.1 Site access would be achieved through the existing site access which connects onto Melford Road. The nearest public footpath is located approximately 187m to the east of the site, and heads south following the access to Slough Farm before branching off to the west. No amendments are proposed to the access in this location. The photo montage in Figure F9.0 overleaf details the existing access for the site.



Figure F9.0 Photo montage illustrating the existing site access for the site.

11.2 Paragraph 85 is intrinsically focussed on commerce:

*“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”.*

- 11.3 Further support and promotion for rural businesses is provided through policies CS17 and EM01. Detailing that development proposals providing employment opportunities are to be assessed against the potential effect on residential amenity, environmental quality, traffic generation and road safety.
- 11.4 Policy TP15 seeks to secure safe accesses and egress for proposals, and avoid adverse impacts on highway safety. Given the existing use of the site access for agricultural machinery, which would include vehicles such as combine harvesters, it is reasonable to consider that the use of this access for vans and delivery lorries would not create negative impacts on highway safety.
- 11.5 Parking provision on the site can be provided using the building labelled “2” (as identified in Figure F3.0 on page 3 which illustrates the extents of the change of use on site, and the specific uses of the buildings on the site), in conjunction with the hardstanding areas providing space for manoeuvring.
- 11.6 As detailed within this report the approximate length and width of building 2 are 42.0m by 10.0m respectively. At the eastern end of the building on the boundary is a partitioned section with doors which has the option to be used for storage.
- 11.7 The remaining floorspace is approximately 28m in length, taking into consideration framework and end walls. Providing parking bay sizes of 3.5m in width to accommodate commercial vehicles would allow for approximately 8 parking spaces in this space.

11.8.1 Therefore given the nature of the proposal and its reuse of existing development, it is reasonable that the proposal is considered to accord with relevant local and national policy regarding transport and highway safety.

## **12.0 Conclusion.**

12.1 As evidenced through the information provided in this Planning Statement the proposed development accords with local and national policies. The proposal is for a light industrial use on a site previously used for agricultural purposes. It would create jobs that would support the local economy, in a location that is well placed between several larger economic centres.

## Appendix 1

Details of Heritage assets taken from the historic records held by Historic England, these are listed starting from the asset located to the east of the site on Melford Road to the Heritage Asset to the South east of the site.

Title	List Description	Grade	Location
Rookery Farm (House)	<p>This List entry was subject to a Minor Amendment on 05/01/2017.</p> <p>TL 84 NE, 6/1 ACTON, Rookery Farm</p> <p>(Formerly listed as: Rookery House) (Previously listed as: Rookery Farmhouse) 10.01.53.</p> <p>A C17 timber-framed and plastered house, altered in the C18 and later. Built on an L-shaped plan with wings extending north and east. 2 storeys and attics. The south front has 2-window range, double-hung sashes with glazing bars, and the west front has 3-window range, with casements on the upper storey. Roof tiled, with a central chimney stack on the north wing, with grouped shafts, some octagonal.</p> <p>Listing NGR: TL8964147039</p> <p><a href="#">ROOKERY FARM, Acton - 1036717   Historic England</a></p>	II	Rookery Farm, Lavenham Road, CO10 0BJ
Slough Farmhouse	<p>SLOUGH LANE 1. 5377 Acton Slough Farmhouse TL 84 NE 6/15 10.1.53. II</p> <p>2. A C17 timber-framed and plastered house with gables at the east and west ends. 2 small wings extend north with half hipped roofs. 2 storeys. The front is of brick, plastered. 1:3:1 window range, casements with gault brick rustications and square stucco hood moulds. A central boarded door has brick rustications and a hood mould joined to those of the windows on either side. Roof tiled, with a central chimney stack with 4 grouped octagonal shafts on a square base.</p> <p>Listing NGR: TL8997846760</p> <p><a href="#">SLOUGH FARMHOUSE, Acton - 1351750   Historic England</a></p>	II	Slough Farmhouse, Slough Lane, Suffolk





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