



SUPPORTING STATEMENT

In respect of the change of use of land for the stationing of a mobile home for occupation by a rural worker at:

West End Farm Kennels, Worlds End Lane, Buxhall,
Stowmarket, Suffolk, IP14 3ED

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1.0 Introduction

1.1 This statement is prepared in support of an application for the change of use of land at West End Farm, Worlds End Lane, Buxhall for the siting of a mobile home for occupation by a worker associated with the operation of West End Farm Kennels.

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.

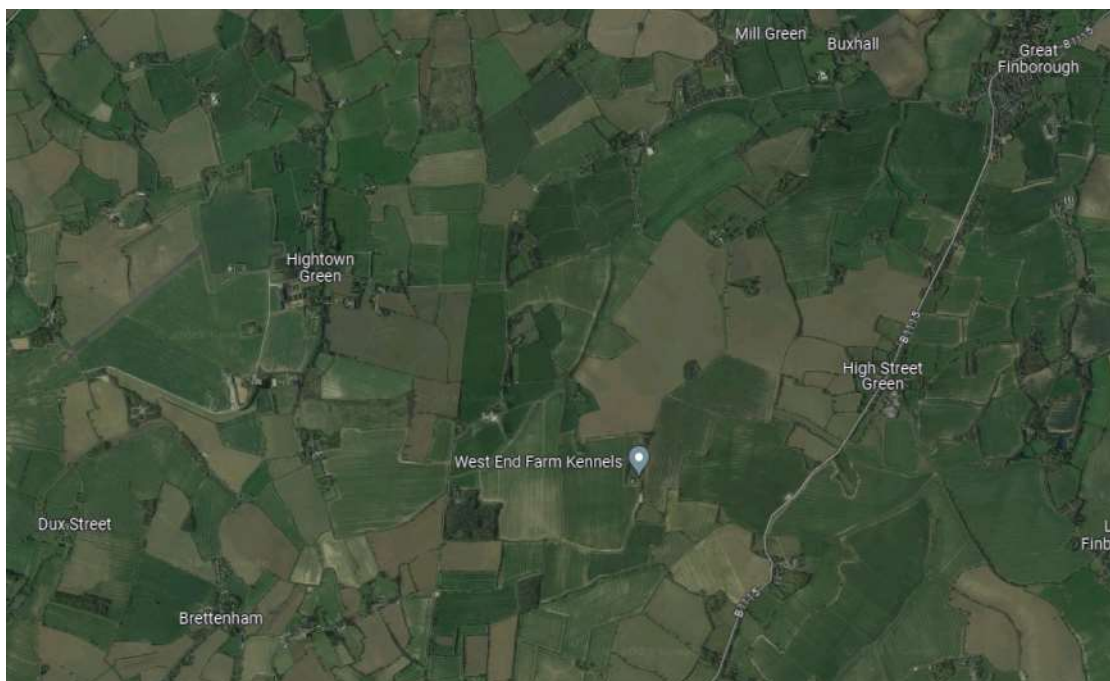


Image 1: Google Aerial View

1.4 Further to this Supporting Statement, the application is supported by the following plans and documents:

- Full Planning Application Forms;
- Existing and Proposed Plans;
- Flood Map for Planning Extract.

2.0 The Site

2.1 West End Farmhouse is a Grade II listed building which the listing describes as:

“Farmhouse, probably late C16 or early C17. 1 storey and attics. 3-cell cross-entry plan. Timber-framed and roughcast with some false half-timbering. Thatched roof with two plaintiled casement dormers. An axial chimney of C18 or C19 red brick; a C19 gable chimney to right. 3-light C20 casements. C20 boarded door at cross-entry position”.

2.2 The site lies in a remote position accessed off World’s End Lane. It is some distance from neighbouring property and set in an open position within the countryside, albeit that the curtilage is bordered by hedging along the northern and western boundaries.

2.3 In 2006, planning permission was sought and granted for the use of the farm buildings as kennels for stray dogs. The kennels that operate from the site had been in operation for many years prior to that application, and that proposal sought an expansion of the facilities at the site. The site now operates as a boarding kennels for dogs that require kennelling from a range of sources, including many of the neighbouring Councils, the police and the RSPCA. More details on these arrangements can be found at chapter 6 of this statement.

2.4 A total of 7 full-time staff are employed in the operations and 2 part-time staff also. The kennels are licensed to hold 75 dogs, and the site is regularly at capacity. It is, therefore, a well used and much needed facility that has been established here for many years.

2.5 The site is not subjected to any specific landscape designations and lies entirely within Flood Zone 1, therefore falling at the lowest risk of flooding.

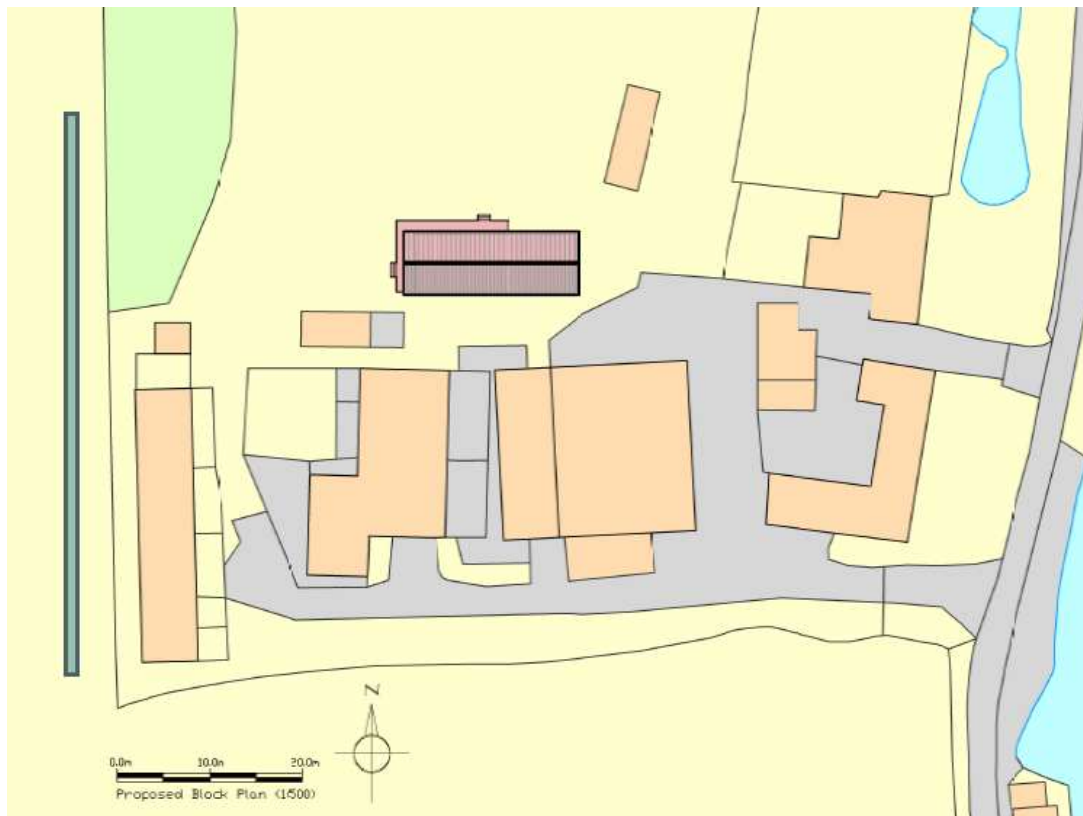
2.6 The site is not within a Conservation Area.

2.7 Due to the nature of the business and the number of animals kept at the site, it is important that any visit to the site is prearranged and not made on an unannounced basis please.

3.0 The Proposal

3.1 The application seeks planning permission for the siting of a mobile home adjacent to the kennels for the purposes of occupation by a full-time employee at the kennels.

3.2 The extract below is taken from the proposed block plan and shows the mobile home sited adjacent to the kennel buildings and to the west of the farmhouse.



3.3 Details of the form of mobile home proposed are included with the application documents.

3.4 The proposed mobile home will only be occupied by the kennel manager/a member of staff and is sited so as to remain overseen by the applicant from the main house. However, for reasons set out in chapter 6, the applicant will be stepping back from day to day running of the operations at the site.

3.5 Ample car parking is available on the site and sufficient parking is also retained for the existing dwelling.

4.0 Planning History

- 4.1 As detailed above, planning permission was granted for kennels to support stray dogs in 2006. However, the site has operated as a kennels for many decades.

5.0 Planning Policy Context

- 5.1 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.

- 5.2 The NPPF is supported by the Planning Practice Guidance (PPG), which assists applicants and decision makers in interpretation the NPPF.

- 5.3 At the heart of the NPPF is the presumption in favour of sustainable development. It identifies that *"For decision-taking this means:*

- *approving development proposals that accord with the development plan without delay;*
or
- *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".*

5.4 The development plan for Mid Suffolk District Council consists of Part 1 of the Joint Local Plan, adopted November 2023. The following policies within this document are considered to be relevant to this proposal:

- SP01 - Housing Needs
- SP03 - The Sustainable Location of New Development
- SP09 - Enhancement and Management of the Environment
- SP10 - Climate Change
- LP05 – Rural Workers Dwellings
- LP09 – Supporting a Prosperous Economy
- LP15 - Environmental Protection and Conservation
- LP16 - Biodiversity & Geodiversity
- LP17 - Landscape
- LP23 - Sustainable Construction and Design
- LP24 - Design and Residential Amenity
- LP27 - Flood Risk and Vulnerability

5.5 These policies will be referred to within the “Planning Considerations” section of this statement, wherever relevant to the consideration of this proposal.

6.0 Planning Considerations

Principle of Development

6.1 At a national level, 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 Whilst the site lies in the countryside for the purposes of planning policy, paragraph 84 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, 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.”*

6.3 There is, therefore, in-principle support for the delivery of rural worker accommodation, where there is an essential need, as an exception to established policies which seek to preclude new residential development in the countryside.

6.4 That provision is also found within the development plan, where policy LP05 identifies that:

“1. Where residential accommodation for a rural worker, outside settlement boundaries, is proposed, it must demonstrate the following:

- a. The essential need for residential accommodation to be located with the existing or proposed use;*
- b. There being no other suitable building(s) or nearby available residential accommodation to serve the proposal;*
- c. The enterprise has been established for at least three years and there is an agreed sustainable business plan to ensure the enterprise will remain financially viable for the foreseeable future;*
- d. New permanent accommodation can only be justified if the enterprise is economically viable and is likely to remain viable for the foreseeable future. Where the business has not been*

established long enough to demonstrate financial soundness, permission may be granted for a temporary dwelling in the form of a residential caravan, mobile home or other prefabricated structure which can easily be dismantled and removed from the site;

e. The residential accommodation is proportionate in scale to the use proposed; and

f. The proposal must not have an unacceptable impact on highway safety”.

6.5 The criteria within this policy are considered relative to this particular proposal below.

a. The essential need for residential accommodation to be located with the existing or proposed use

6.6 The kennels are a long established facility where the operators are reaching a stage of their life where they need support to continue to operate the facility. The current licence is for 75 boarding dogs, though there are also some stray dogs that are held for rehoming which fall outside of the license (due to them not being held for boarding).

6.7 The extensive contracts that they hold means that the kennels are pretty much fully occupied on a consistent basis. Indeed, those contracts extend to all of the following organisations:

- Babergh District Council;
- Mid Suffolk District Council;
- Ipswich Borough Council;
- West Suffolk Council (both the former St Edmundsbury Council and Forest Heath areas);
- Suffolk and Norfolk Police (after arrest when dogs are involved, after sudden death when dogs are involved, after road accidents when dogs are involved, police dogs are also boarded directly here)

6.8 The police also use the site for dangerous dogs, and there has been a marked increase in the number of dogs kept on site for this purpose in recent months. The applicant has also recently been requested to tender to offer boarding services for the dog wardens at East Suffolk Council which, if successful, will mean they will hold the contract for all of the local authorities in Suffolk as well as the police.

- 6.9 Kennels are also on retention for both the RSPCA and Suffolk Animal Rescue for use whenever they are required. It can be seen, therefore, that this is a busy kennel facility serving a wide range of community and charitable facilities. It is well established and generates work for nearly nine full-time staff.
- 6.10 The proposal seeks to provide accommodation for a staff member to permanently reside on the site. The nature of the business means that there needs to be someone on site 24/7 in order to deal with emergency call outs (collection), delivery from the Police, Council or RSPCA (which can occur at any time of the day or night), to handle larger and dangerous dogs and to generally deal with security. Indeed, with respect to that latter point, the remoteness of the site and the value of some of the animals has attracted a number of attempts of theft and from people who have had their dogs taken from them by the police seeking to recover them illegally.
- 6.11 The applicants are in their 70s and can no longer physically manage to carry out these tasks. Notwithstanding this, the need for full-time occupation of the site by a separate worker has become more necessary due to the increased number of animals held here and the increase in the contracts through which the site is able to operate. If current tenders are successful, then further employees would be required on the site (equivalent to another full-time staff member) and the applicant needs to ensure on-site management of the facility is arranged as soon as possible to facilitate the smooth operation of the business and the continued welfare of the animals at all times of the day.

b. There being no other suitable building(s) or nearby available residential accommodation to serve the proposal

- 6.12 The site is accessible only by a lengthy lane. It is in an isolated position, where access to other properties is not readily available. There are no properties in the physical vicinity of the site, yet alone any that would be available to service this need.
- 6.13 The applicant is seeking temporary accommodation in the form of a mobile home, recognising that this is the most appropriate mechanism for providing accommodation in the first

instance. Other buildings on the site are all in use, such that these are needed to remain in commercial use in support of the business.

6.14 There are, therefore, no viable or practical alternatives available.

c. The enterprise has been established for at least three years and there is an agreed sustainable business plan to ensure the enterprise will remain financially viable for the foreseeable future

6.15 The business has been established for many years. It has remained viable, and continues to grow, through an environment where other such facilities have not remained viable. There is nothing to suggest that the services that rely upon it will not continue to do so and, in any event, there are such a range of Councils and organisations that use this service that the business would remain even if some of the contracts dropped away.

d. New permanent accommodation can only be justified if the enterprise is economically viable and is likely to remain viable for the foreseeable future. Where the business has not been established long enough to demonstrate financial soundness, permission may be granted for a temporary dwelling in the form of a residential caravan, mobile home or other prefabricated structure which can easily be dismantled and removed from the site

6.16 The applicant is not seeking a new building. It is recognised that a more temporary solution is not only best for the business but most appropriate in terms of being able to be removed if no longer required at any future point.

e. The residential accommodation is proportionate in scale to the use proposed

6.17 The accommodation is not overlarge and is proportionate to the scale of the business and the buildings on the site.

f. The proposal must not have an unacceptable impact on highway safety

6.18 There are no highway safety implications resulting from this proposal.

6.19 It can be seen, therefore, that this proposal complies fully with the provisions of policy LP05.

Other Matters

6.20 Whilst policy LP05 covers a range of issues associated with this proposal, the assessment below addressed matters that are not directly covered by this policy.

Landscape Impact

6.21 Paragraph 180 of the NPPF states that:

“Planning policies and decisions should contribute to and enhance the natural and local environment by:

(a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

(b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

(c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

(d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

(e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

(f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate”.

- 6.22 The mobile home is sited behind the existing dwelling and adjacent to the existing buildings. It also sits in a well contained site, close to larger and more prominent buildings. The mobile home is sited well back from the highway and due to its size and scale is not visually prominent when viewed from the highway or within the wider landscape. The significant hedgerows which border the site provide extensive screening from the open countryside beyond the site and precludes any clear views of the mobile home such that its impact on the landscape is negligible.
- 6.23 There is, therefore, nothing about this proposal which seeks to introduce visual impact, with any impacts being localised due to the contained nature of the site and the limited scale of the building.
- 6.24 As such, this proposal complies with the requirements of paragraph 180 of the NPPF as well as the respective elements of policies GP01 and LP17 which address landscape impact.

Land Contamination

- 6.25 The application is supported by a Groundsure report and the requisite land contamination questionnaire, which demonstrate that the land is not known to be, or likely to be, contaminated.
- 6.26 The proposal is therefore in accordance with paragraph 189 of the NPPF which states 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.

Residential Amenity

- 6.27 Given the size of the existing site, and the separation distance between the mobile home and the existing dwelling, the proposal is not considered to have any detrimental impact on residential amenity. Furthermore, there is no risk of overlooking resulting from the proposal.

Flood Risk and Drainage

- 6.28 The site lies wholly in Flood Zone 1 and is, therefore, outside the designated Flood Zones 2 and 3. Suitable drainage can be designed to ensure that the development does not increase the risk of flooding elsewhere by use of soakaways (if ground conditions permit) or SUDS designed systems.
- 6.29 As such, there is no identifiable restraint upon the delivery of drainage for both surface and foul water that would prevent planning permission being granted in this regard.

Biodiversity and Ecology

- 6.30 Regulation 9(5) of the Conservation of Habitats and Species Regulations 2010 (Implemented 1st April 2010) provides that all "competent authorities" (public bodies) to "*have regard to the Habitats Directive in the exercise of its functions*".
- 6.31 Guidance on the conservation of protected species is given in ODPM Circular 06/2005. At Paragraph 99 the Circular advises that the presence or otherwise of protected species, and the extent to which they might be affected by the proposed development, must be established before planning permission is granted.
- 6.32 In this instance, the proposal relates to the use of land and does not constitute physical building works. A mobile home can be sited here without the need for planning permission for a variety of uses ancillary to the main house, such that there is no justifiable requirement for the provision of an ecology survey in these circumstances. The land is mowed lawn that forms part of the kept garden of the host dwelling. The proposal does not affect any trees or hedgerows. This demonstrates that the development can be carried out without harm to ecological interests or to important habitat. In any event, there is significant scope to bring about biodiversity enhancements on the site such as to provide a net gain across the site.

Sustainable Development

- 6.33 Paragraph 8 of the NPPF outlines the three objectives of sustainable development that schemes should seek to deliver. The proposal carries the following sustainability benefits.
- 6.34 From the economic aspect, the proposal would generate a small benefit for local trade before, during and after the works to site the mobile home here. The purchase of materials to support the development will also deliver economic benefits. Furthermore, there will be a positive benefit through the support to local amenities, facilities and services resulting from future occupiers. The proposal can, therefore, be seen to be economically sustainable.
- 6.35 The social aspects of new housing are embedded in the NPPF which states that *“supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being”*.
- 6.36 Notwithstanding that a proposal in this location would contribute to enhancing and maintaining services within Od Newton and nearby towns/villages, 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. At paragraph 109 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 therefore to be sufficiently flexible to take account of the differences between urban and rural areas.

- 6.37 The proposal seeks to provide accommodation for a rural worker. It will prevent the need for that worker to have to travel to and from the site simply to attend work, thereby reducing vehicle movements to and from the site. The delivery of a new dwelling would help to meet housing need in the locality and would also help to boost the supply of housing required by the NPPF. Both national and local policy identify that the provision of accommodation for rural workers is acceptable in principle in rural settings (including in isolated locations) such that this location cannot, in itself, be reason to find a proposal unsustainable.
- 6.38 For these reasons, it is considered that the proposal also meets the social objective of sustainable development. Furthermore, the proposal's contribution to the Council's housing supply should not be underestimated. The development can be carried out within a short timescale, such that 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.
- 6.39 With regards to the environmental elements of the development, the proposal would not give rise to permanent construction and will deliver a well insulated structure that will enable a rural worker to reside full-time at their place of work. It will reduce the need to travel. The mobile home will include the use of water efficient taps, showers and toilets, and energy efficient white goods. These elements would deliver further benefits in terms of significantly reducing the impacts of the development.
- 6.40 With this in mind, the proposal is considered to prevent any environmental harm from resulting. As such, any harm would not significantly and demonstrably outweigh the benefits of the scheme, where the delivery of a new dwelling to the market would contribute to the districts housing supply. As such, the balancing of the main issues would result in a conclusion that the proposal is sustainable and, therefore, there would be a presumption in favour of it.

Heritage Impacts

- 6.41 The proposal seeks permission for the siting of a mobile home to the rear of this Grade II listed building.

- 6.42 The Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty on local planning authorities to have special regard to the desirability of preserving listed buildings and their settings (Sections 16 and 66).
- 6.43 Section 16 of the NPPF sets out the Government's position on the conservation and enhancement of the historic environment. Paragraph 200 of the NPPF requires applicants to describe the impact of proposals on the significance of any heritage asset to a level of detail proportionate to the assets' importance. As set out above, this should be no more than is sufficient to understand the potential of that impact on the significance. Paragraph 195 requires local planning authorities to identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.
- 6.44 Paragraph 203 sets out that in determining planning applications, local planning authorities should take account of:
- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - the desirability of new development making a positive contribution to local character and distinctiveness.
- 6.45 Paragraphs 207 and 208 address how local planning authorities should deal with situations where the assessment of impacts has identified harm to a heritage asset.
- 6.46 Along with the respective planning policies that seek to secure the preservation and enhancement of these buildings and their settings, these legislative and policy provisions cumulatively identify a need to assess the significance of the heritage asset in a proportionate manner, identify the impact of the proposed development on that significance, balance any

harm arising against the public benefits and ensure that the special character of the building is preserved and, where possible, enhanced.

- 6.47 The proposal seeks to site the mobile home behind the listed building, within its immediate setting. However, it is to be sited on the land rather than erecting a permanent building, and is sited so as to have a relationship with the kennels that it will serve. There are no alternative sitings that would retain the relationship with the main house (so as to enable the applicants to retain oversight of the business) but where the occupant of the mobile home can be closely related to the kennels for emergency purposes.
- 6.48 The proposed mobile home will not compete with the existing dwelling and will read as a building set within its curtilage. It is clustered within the context of the existing buildings, retaining the open aspect to the north of the dwelling and not interrupting views from the east, where the listed dwelling is open to the countryside.
- 6.49 It is considered, therefore, that the proposal preserves the setting of the listed building in the manner in which both development plan policies and national policy seek to secure.

7.0 Planning Balance

- 7.1 The proposal seeks permission for the use of land at World's End Farm Kennels for the siting of a mobile home for occupation by a staff member to manage the out of hours activities associated with the kennels.
- 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 As an application which relates to the provision of rural workers accommodation in an isolated location, the proposal benefits from support through the provisions of paragraph 84 of the NPPF which provides for such accommodation as an exception to established planning policies that seek to protect the countryside. The proposal is, therefore, acceptable as a matter of principle.
- 7.4 Furthermore, there is provision within both the existing and emerging development plans for this authority that facilitate the delivery of such accommodation. The proposal has, therefore, been considered relative to the impacts that result from the proposal. It has been found that the proposal delivers a unit of accommodation that meets the established need locally, and would not give rise to harm to important material considerations including highway safety, residential amenity, landscape impact, biodiversity, heritage assets and flood risk. The proposal does not, therefore, give rise to any identifiable harm.
- 7.5 The proposal has also been assessed against the three objectives of sustainable development. In respect of the economic strand, the applicant recognises that there would be modest benefits from the works required to site the mobile home and from the contribution made by future occupants into the local economy. However modest that may be, the proposal is economically sustainable. This position is furthered by the importance of this accommodation to an established business that serves a wide part of the local community and associated public services.
- 7.6 In terms of the social dimension, the NPPF recognises the contribution made by the delivery of housing and the vitality of rural communities to the social aspect of sustainability. The proposal delivers a modest unit of accommodation in a location that supports the existing business and facilitates the services that it offers to local Councils, the police and the RSPCA. In the absence of any social detriment, the proposal must be considered to be socially sustainable.
- 7.7 The matter of environmental sustainability is, as is often the case in rural areas, more complex. The PPG recognises that there is a need to take a flexible approach to considering the potential for sustainable transport modes in rural areas and the proposal sites a mobile home in a position that does not detract from the existing dwelling, a heritage asset. In this regard, and

in the absence of any recognisable detriment to matters such as biodiversity, land contamination, or drainage, the proposal is found to be environmentally sustainable also.

7.8 The proposal is thereby found to be environmentally sustainable. As such, the balancing of the main issues would result in a conclusion that the proposal is a sustainable and, therefore, there would be a presumption in favour of it. It complies with the relevant elements of both existing and emerging development plan policy.

7.9 For all of these reasons, the proposal is found to be a sustainable development and should, thereby, be supported.