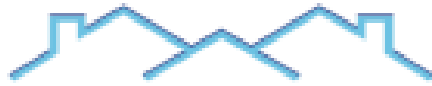


# Planning Design & Access Statement

*White House Farm, Dublin Road, Occold, Suffolk,  
IP23 7PY*



**JS Planning Services**

## **CONTENTS**

- 1.0 Introduction
- 2.0 Understanding the Site Context
- 3.0 Proposed Development
- 4.0 Relevant Planning History
- 5.0 Planning Policy Context
- 6.0 Principle of Development
- 7.0 Introduction to Material Planning Considerations
- 8.0 The Planning Balance

## **1.0 Introduction**

1.1 JS Planning Services have been instructed by the applicant to prepare and submit a full planning and Listed Building Consent application to Mid Suffolk District Council (hereinafter referred to as the LPA) for the erection of a single storey side extension (orangery).

1.2 This Statement has been prepared by James Stannard, chartered member of the Royal Town Planning Institute (MRTPI) and should be read in conjunction with the following plans that accompany the submission, as set out in full below:

- *Location Plan*
- *Existing and Proposed Site Plan*
- *Existing Floor and Elevation Plans*
- *Proposed Floor and Elevation Plans*
- *Heritage Statement (Squire Heritage Consultancy)*
- *Planning, Design and Access Statement (JS Planning Services)*

1.3 The purpose of this document is to provide a context of the site and its surroundings, set out the details of the proposed development, identify the relevant local and national planning policies and other considerations pertinent to the assessment and determination of the application, and to carry out an assessment of the proposal against such considerations, demonstrating compliance with all relevant planning policy.

1.4 Section 6.0 of this Statement considers the principle of development, having regard to Section 66(1) of the Act 1990, relevant Local Development Plan policies and restrictive policies contained under Chapter 16 of the NPPF relating to Heritage Conservation, whilst Section 7.0 of this Statement sets out how the proposed use aligns with all relevant local and national planning policy considerations, having regard to all material considerations.

1.5 JS Planning Services submits that the proposed use constitutes a sustainable form of development that complies with all relevant Local Development Plan policies, relevant supplementary planning guidance, and relevant paragraphs within the National Planning Policy Framework (NPPF) and should thus be approved subject to appropriate conditions.

## **2.0 Assessment of Context**

2.1 The application relates to a site that lies north of Dublin Road, approximately 0.5km southeast of the village of Occold, and a 4km south east of the town of Eye, Suffolk.

2.2 The site lies outside of any defined settlement boundary in the open countryside and contains a number of buildings and natural features associated with White House Farm.

- 2.3 The main farmhouse, White House Farm, is Grade II Listed, understood to date from the 16<sup>th</sup> and 17<sup>th</sup> centuries, and sits at the southern end of the cluster of former barns and other buildings close to the public highway.
- 2.4 The two storey dwellinghouse has a simple rectangular form and is orientated with the principal elevation that fronts southwards on to a private driveway and front garden.
- 2.5 The dwellinghouse is timber framed, finished in render, characterised by two chimney stacks at each end. The main south facing façade comprises a classically inspired elevation and a slated roof, giving an attractive composition at lower and upper orders of the building.
- 2.6 An additional garden area extends eastwards from the main dwellinghouse supplemented by a pond.
- 2.7 The eastern gable is characterised by a single storey conservatory that was implemented following the granting of planning permission and Listed Building Consent in March 1996.
- 2.8 The main gables have a noticeable steep roof pitch, which contrasts in a rather odd and contrived manner with the shallower roof pitch of the rear outrigger and subsequent parallel single storey extension beyond.
- 2.9 The conservatory currently in situ replaced a former conservatory with a flat roof, is accessed via the Sitting Room, and spans a width of 4.6m and a depth of 3.0m, reaching an approximate eaves height of 2.4m and overall ridge height of 3.7m.
- 2.10 The conservatory is set on a small brick base with timber fenestration finished in a neutral tone, with a pitched glazed roof.

### **3.0 Proposed Development**

- 3.1 The application seeks permission for a single storey side extension which would serve as an Orangery and sit alongside the existing conservatory, accessed via the Kitchen.
- 3.2 The final design of the proposed orangery extension as shown on the plans submitted with the application has been reached following a process which started with an assessment of significance undertaken by Squire Heritage Consultancy.
- 3.3 Figure 1 below shows a screenshot of the original draft plans prepared prior to the assessment of historic significance being carried out. Figure 2 shows a 3D visualisation of these draft proposed plans.



**Figure 1:** Screenshot of draft plans prepared prior to assessment of historic significance



**Figure 2:** Screenshot of draft 3D visuals prepared prior to assessment of historic significance

- 3.4 Following a detailed and comprehensive assessment of historic significance, Squire Heritage Consulting prepared an informal advice note with suggested amendments in order to enhance the design quality of the extension and its relationship with the existing building.
- 3.5 The amendments suggested by Squire Heritage in relation to the proposed plans as originally drafted are summarised as follows:
- *The ridge of the proposed orangery should be lower than the conservatory*
  - *The eaves should be reduced in height on the same line and should ideally be the same depth as the Conservatory. The (original) design of the eaves are 'bulky' and is undesirable*
  - *The detailing on the eaves should be a continuation of the existing as seen on the dentils of the conservatory so that they are unified*
  - *The frame of the proposed should be coloured grey, so it reflects the slate tiles to enable the ground floor to blend in with the roof.*
- 3.6 As set out within Section 7.0 of this Statement, the final (amended) design has adopted and implemented these useful suggestions from our heritage consultant, in a careful and sensitive manner, to ensure that the historic interest and character of the building, the street scene, and wider rural character is

preserved, as required by relevant local and national planning policies and underpinning legislation.

3.7 Figure 3 below shows a screenshot of the final front and side elevations of the proposed extension whilst Figure 4 shows 3D visualisations of the final plans.



**Figure 1:** Screenshot of final plans prepared following assessment of historic significance



**Figure 2:** Screenshot of final 3D visuals prepared prior to assessment of historic significance

## 4.0 Planning History

4.1 A review of the online mapping portal on the LPA’s website confirms that the site and buildings within the wider confines of White House Farm have been subject to a long planning history.

4.2 The relevant planning history that relates specifically to the main farmhouse is set out as follows:

0207/96                      Erection of lean-to roof and supporting structure to existing flat roofed conservatory (Approved 14<sup>th</sup> March 1996)

0049/96/LB                      Listed Building Consent for erection of lean-to roof and supporting structure to existing flat roofed conservatory. Replace kitchen window and remove extractor, insert French casement entrance doors in place of window; insert new first floor east gable end window, and fit new inner door to conservatory (Approved 14<sup>th</sup> March 1996).

## **5.0 Relevant Local and National Planning Policies**

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the Development Plan taking into consideration any material considerations relevant to the determination of the application.

### **Local Development Plan**

5.2 The Local Development Plan for this site is made up of the following documents:

- Babergh and Mid Suffolk Joint Local Plan Part 1 (Nov 2023)

### **Supplementary Planning Documents (SPD's)**

5.4 The LPA have a number of adopted SPD's however none are considered pertinent to the assessment and determination of this Planning and Listed Building Consent application.

### **National Planning Policy**

5.5 The National Planning Policy Framework (NPPF) was originally published in 2012. The latest revision was published in 2023 and sets out the Government's planning policies for England and how they should be applied. The NPPF is a material consideration for the determination of all planning applications. Relevant chapters of the NPPF to this proposal are set out as follows:

|   |            |
|---|------------|
| Achieving Sustainable Development                 | Chapter 2  |
| Achieving Well Designed Places                    | Chapter 12 |
| Conserving and Enhancing the Natural Environment  | Chapter 15 |
| Conserving and Enhancing the Historic Environment | Chapter 16 |

## **6.0 Principle of Development**

6.1 The application seeks Full Planning Permission and Listed Building Consent for a single storey side extension (referred to as an 'Orangery') on a site which lies in the open countryside outside of the defined settlement limits.

6.2 Local Plan (LP) Policy SP03 sets out the spatial strategy for development in the district and states that outside of the defined settlement boundaries, only certain types of development will be supported, which includes a list of development set out in Table 5.

6.3 The types of development within Table 5 include residential extensions and thus the principle of extending a residential dwelling in the rural areas outside the settlement limits is acceptable subject to all other relevant policies within the Plan and other material considerations.

- 6.4 The proposal relates to a Listed Building and as such the application is subject to LP Policy L19 – Historic Environment, and restrictive national policies relating to heritage conservation set out under Chapter 16 of the NPPF, underpinned by Section 66(1) of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act')
- 6.5 In light of the above, the principle of development can only be supported where the application can demonstrate compliance with the above policy and legislation.

## **7.0 Planning Considerations**

- 7.1 Having considered the principle of development, this section considers all relevant planning matters that are pertinent to the assessment and determination of the application.
- 7.2 The two planning issues that are relevant to this application, assessed below, are as follows:
- Design & Impact on Heritage Assets
  - Residential Amenity

### ***Design & Impact on Heritage Assets***

#### Legislative and Policy Context

- 7.2 Section 66 (1) of the Act states that:

*"In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."*

- 7.3 Chapter 12 of the NPPF contains national policies aimed at creating well designed places. Paragraph 130 states that decisions should ensure that developments function well and add to the overall quality of an area for the short term and over the lifetime of the development; are visually attractive as a result of good architecture, layout and landscaping, and are sympathetic to local character and history including the surrounding built environment and landscape setting.
- 7.4 Chapter 16 of the NPPF contains the restrictive national policies that relate to the conservation and enhancement of the historic environment. Paragraphs 199-202 sets out how a local planning authority should assess the significance of a heritage asset and how to assess the potential impact of a development proposal upon that asset.
- 7.5 Where a proposed development will lead to substantial harm to (or total loss of



significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

7.6 LP Policy LP03 relates specifically to Residential Extensions and Conversions and states the following:

- 1) *Proposals for extensions to existing dwellings or conversions of buildings to ancillary use within the curtilage of residential dwellings will be supported where they:*
  - a) *Incorporate a high standard of design which maintains or enhances the character and appearance of the buildings, street scene and surroundings;*
  - b) *Will not result in over-development of the plot and will retain suitable amenity space. The cumulative effects of a number of extensions or conversions within the plot will be taken into account;*
  - c) *Will not unacceptably affect the amenities of neighbouring occupiers; and*
  - d) *Ensure sufficient parking spaces and turning spaces (where required) are retained or provided*

7.7 LP Policy LP19 relates to the Historic Environment and states the following:

1. *Where an application potentially affects heritage assets, the Councils will require the applicant to submit a heritage statement that describes the significance of any heritage asset that is affected including any contribution made by their setting. The level of detail should be proportionate to the asset's importance and sufficient to understand the potential impact.*
2. *In addition, where an application potentially affects heritage assets of archaeological interest, the heritage statement must:*
  - a) *Include an appropriate desk-based assessment and, where necessary, a field evaluation by a suitably qualified person; and*
  - b) *If relevant, demonstrate how preservation in situ of those archaeological assets can be achieved through the design of the development and safeguarding during construction.*
3. *The Councils will:*

- a. *Support the re-use/ redevelopment of a heritage asset, including Heritage at Risk and assets outside settlement boundaries, where it would represent a viable use, and the proposal preserves the building, its setting and any features which form part of the building's special architectural or historic interest;*
  - b. *Support development proposals that contribute to local distinctiveness, respecting the built form and scale of the heritage asset, through the use of appropriate design and materials;*
  - c. *Support proposals to enhance the environmental performance of heritage assets, where the special characteristics of the heritage asset are safeguarded and a sensitive approach to design and specification ensures that the significance of the asset is sustained; and*
  - d. *Take account of the positive contribution that the conservation of heritage assets can make to sustainable communities, including their economic vitality.*
4. *In order to safeguard and enhance the historic environment, the Councils will have regard (or special regard consistent with the Councils' statutory duties) where appropriate to the historic environment and take account of the contribution any designated or non-designated heritage assets make to the character of the area and its sense of place. All designated and non-designated heritage assets must be preserved, enhanced or conserved in accordance with statutory tests and their significance, including consideration of any contribution made to that significance by their setting.*
  5. *When considering applications where a level of harm is identified to heritage assets (including historic landscapes) the Councils will consider the extent of harm and significance of the asset in accordance with the relevant national policies. Harm to designated heritage assets (regardless of the level of harm) will require clear and convincing justification in line with the tests in the National Planning Policy Framework.*
  6. *Proposals which potentially affect heritage assets should have regard to all relevant Historic England Advice and Guidance.*
  7. *Where development is otherwise considered acceptable, planning conditions/obligations will be used to secure appropriate mitigation measures and if appropriate a programme of archaeological investigation, recording, reporting, archiving, publication, and community involvement; to advance public understanding of the significance of any heritage assets to be lost (wholly or in part); and to make this evidence and any archive generated publicly accessible.*
- 7.8 LP Policy LP24 relates to Design and Residential Amenity, and (amongst other things) states the following:

1. *All new development must be of high-quality design, with a clear vision as to the positive contribution the development will make to its context. As appropriate to the scale and nature of development, proposals must:*
  - *respond to and safeguard the existing character/context;*
  - *create character and interest;*
2. *In order to achieve this development proposals shall:*
  - o *Respond to the wider townscape/landscapes and safeguarding the historic assets/ environment and natural and built features of merit;*
  - o *Be compatible/harmonious with its location and appropriate in terms of scale, mass, form, siting, design, materials, texture and colour in relation to the surrounding area;*
3. *All developments must also demonstrate that they have regard to the design principles set out through Suffolk Design, the Councils' Design Supplementary Planning Documents, design documents which support Neighbourhood Plans and/or village design statements. Development which fails to maintain and, wherever possible improve, the quality and character of the area will not be supported.*

### Assessment

- 7.9 The application relates to an attractive Grade II Listed farmhouse and as such it is imperative that any proposed extensions or alterations to the existing dwellinghouse is handed in a careful and sensitive manner.
- 7.10 At the time JS Planning Services were appointed to act as planning agent on behalf of the applicant, draft floor and elevation plans, supported by 3D visualisations, as shown in Figures 1 and 2 under Section 3.0 of this Statement.
- 7.11 The applicant was strongly advised that they appoint a suitably qualified Heritage Consultant at the earliest opportunity to assess the historical significance of the listed building, which in turn would shape and inform the design process and potential amendments to the draft proposals.
- 7.12 The Heritage Statement prepared by Squire Heritage Consulting includes a comprehensive and detailed assessment of heritage significance which is set out under Section 3.0.
- 7.13 Further to this assessment, Squire Heritage proposed a number of minor amendments, as set out under paragraph 3.5 of this Statement, with the motive of enhancing not only the design of the proposed extension as a standalone structure, but also how it relates to the existing conservatory and the main dwellinghouse, and how the eastern elevation is read as a whole.

- 7.14 As referred in Section 2.0, it is clear that when viewed from the east, the existing dwellinghouse presents a variety of confusing odd, and contrived roof rooms that when read as a whole, dilute somewhat the attractiveness of the property.
- 7.15 The presence of the existing conservatory shows that a modern contemporary addition can be introduced in a manner that respects the dominance of the parent building with regards to its scale and height and respects its visual characteristics through an appropriate palette of materials.
- 7.16 The proposed Elevation Plans show that the suggested amendments that were proposed by Squire Heritage Consultancy in relation to draft plans have been implemented in full.
- 7.17 The height of the proposed orangery has been reduced to a level which mirrors (rather than competes with) the existing conservatory. The thickness of the eaves has also been reduced so that they are now much slimmer. Furthermore, the roof lantern has been amended so that it reads as a subservient feature when read alongside the more striking and steeper pitch of the existing conservatory.
- 7.18 With regards to the choice of materials, the proposed extension would be sat on a small brick base that mirrors the character and appearance of that seen in the existing conservatory. The timber frames would be finished in a sympathetic with the roof finished in a darker grey, which results in an attractive differential.
- 7.19 When considering the detailed assessment contained within the supporting Heritage Statement, and in light of the above, we submit that the proposed extension, by virtue of its scale, height, and massing, respects the dominance of the parent building, and scale of the existing conservatory.
- 7.20 Moreover, the choice of materials allows the proposed extension to read as a contemporary, highly attractive addition to the existing gable, in a manner that respects the character and appearance of the existing conservatory, and the dwellinghouse more widely.
- 7.21 When read as a whole, it is submitted that the proposed extension preserves the historic interest, fabric and character of the existing Listed Building, the street scene and wider rural landscape, in full compliance with Local Plan Policies LP03, LP19 and LP24, relevant paragraphs relating to Design under Chapter 12 and relevant paragraphs relating to Heritage Conservation under Chapter 16 of the NPPF, underpinned by Section 66 of the Act 1990.

### ***Residential Amenity***

#### Policy Context

- 7.22 LP Policy LP24 relates to Design and Residential Amenity, and (amongst other things) states the following:

1. *All new development must be of high-quality design, with a clear vision as to the positive contribution the development will make to its context. As appropriate to the scale and nature of development, proposals must (amongst other things):*

- *be designed for health, amenity, well-being and safety;*

2. *In order to achieve this development proposals shall (amongst other things):*

- *Protect the health and amenity of occupiers and surrounding uses by avoiding development that is overlooking, overbearing, results in a loss of daylight, and/or unacceptable levels of light pollution, noise, vibration, odour, emissions and dust, including any other amenity issues;*

7.23 Paragraph 130 of the NPPF requires all development proposals to respect and preserve the amenity for all existing and future occupiers of land and buildings.

### Assessment

7.24 The proposed dwellinghouse benefits from a relatively isolated location in the open countryside being situated a relatively significant distance from the nearest neighbouring residential property.

7.25 The scale of the proposed extension is broadly similar to the existing conservatory well contained within the confines of the dwellinghouse with little to no views from the public highway.

7.26 As such, it is submitted that the introduction of this proposed extension would not result in any adverse harm to the residential amenity of any neighbouring property, in accordance with LP Policy LP24 and paragraph 130 of the NPPF.

### **Ecology**

#### Policy

7.27 LP Policy LP16 relates to Biodiversity and Geodiversity and contains a set of principles which new development must adhere to. These include (amongst others):

- *Protect designated and, where known, potentially designated sites. Proposed development which is likely to have an adverse impact upon designated and potentially designated sites, or that will result in the loss or deterioration of irreplaceable biodiversity or geological features or habitats (such as ancient woodland and veteran/ancient trees) will not be supported;*

- *Protect and improve sites of geological value and in particular geological sites of international, national and local significance;*

- *Conserve, restore and contribute to the enhancement of biodiversity and geological conservation interests including Priority habitats and species. Enhancement for biodiversity should be commensurate with the scale of development;*
- *Identify and pursue opportunities for securing measurable net gains, equivalent of a minimum 10% increase, for biodiversity. The Councils will seek appropriate resources from developers for monitoring of biodiversity net gain from developments. Where biodiversity assets cannot be retained or enhanced on site, the Councils will support the delivery of net gain in biodiversity off-site*

7.28 Chapter 15 of the NPPF contains national planning policies aimed at conserving and enhancing the Natural Environment. Paragraph 180 of the NPPF states that policies and decisions should contribute to and enhance the natural and local environment, by (amongst other things)

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

7.29 Paragraph 186 of the NPPF goes on to state that in determining applications, Local Planning Authorities should apply a number of principles that essentially seek to avoid harm to statutory designations, protected species or habitat.

### Assessment

7.30 The site is not situated within any statutory ecological designation. The nature of the proposed development does not include any demolition or conversion that would usually warrant any ecological assessment or analysis.

7.31 However, much to our bemusement, the LPA have insisted that the application be accompanied by a Preliminary Ecological Appraisal that demonstrates how the application will not result in any adverse harm to ecological assets, protected species and habitat, supported by appropriate mitigation measures where required.

7.32 As such, the application is supported by a Preliminary Ecological Appraisal prepared by suitably qualified ecological consultants MHE Consulting (dated 26<sup>th</sup> January 2024).

7.33 The Appraisal makes clear that the proposed development would not result in any adverse harm to any ecological assets, protected species or habitat, and includes appropriate precautionary mitigation measures that support the desire to incorporate aspects that amount to a Biodiversity Net Gain.

7.34 Having regard to LP Policy LP16, it is important to note that there is only a requirement to ***pursue opportunities*** to secure net gains equating to 10%. The Environment Act 2021, which includes a legal requirement to secure

Biodiversity Nett Gain of 10% comes into effect after this application has been submitted, and in any event, falls within the exceptions by virtue of being an application for domestic extensions and alterations.

- 7.35 As such, having regard to the modest nature of the development, contained within the domestic curtilage of the property on existing hard standing, and the detailed assessment and conclusions reached by MHE Consulting, it is submitted that the application has satisfactorily demonstrated that the proposed development will not adversely affect any ecological assets, protected species or habitat, in accordance with LP Policy LP16 and relevant paragraphs under Chapter 15 of the NPPF.
- 7.36 In line with local planning policy, and as stated within the accompanying Preliminary Ecological Appraisal, the applicant is willing to accept appropriately worded ‘compliance’ planning conditions that ensure that the proposed development will result in an overall Biodiversity Nett Gain, for example by introducing Bird and Bat Boxes.

## 8.0 The Planning Balance

- 8.1 Paragraph 11 of the NPPF sets out the presumption in favour of sustainable development which goes to the heart of plan making and decision taking. For decision taking, this means:
- (c) approving development proposals that accord with an up-to-date development plan without delay; or*
  - (d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
    - (i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed, or*
    - (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole*
- 8.2 This application seeks Full Planning Permission and Listed Building Consent for a proposed single storey side extension relating to an existing residential property White House Farm, Dublin Road, Occold, Suffolk, IP23 7PY.
- 8.3 Whilst the general principle of extending residential properties in the rural areas outside settlement limits is supported by Local Plan Policy LP03, the property is a Grade II Listed Building, and as such, the application must demonstrate compliance with all relevant legislation, local and national policies relating to heritage conservation, in order to be acceptable.

- 8.4 The final plans submitted with this application has been the result of a thorough and comprehensive assessment of the historic significance of the building by a suitably qualified heritage professional, and, as explained within this Statement, has seen the evolution of the design from its original draft plans to its final design.
- 8.5 As set out in Section 7.0 above, it is submitted that the proposed extension is of a high quality design that by virtue of its scale, height, massing and visual appearance, respects and preserves the historic fabric, character and appearance of the dwellinghouse, the street scene and wider rural landscape, in accordance with Local Plan Policies SP03, LP03, LP19 and LP24, relevant paragraphs contained within Chapters 12 and 16 of the NPPF, and Section 66(1) of the Act 1990.
- 8.6 As a consequence, we submit that the proposal constitutes a sustainable form of development that complies with all relevant Local Development Plan policies and other material considerations, and in line with Paragraph 11 of the NPPF should be approved subject to reasonable and necessary planning conditions.