



STANFORDS

Dodnash Fruit Farm

Bentley

IP9 2DF

Application to Replace an Agricultural Storage Building

Planning Statement



Alison Cox

March 2024

1.0 Introduction

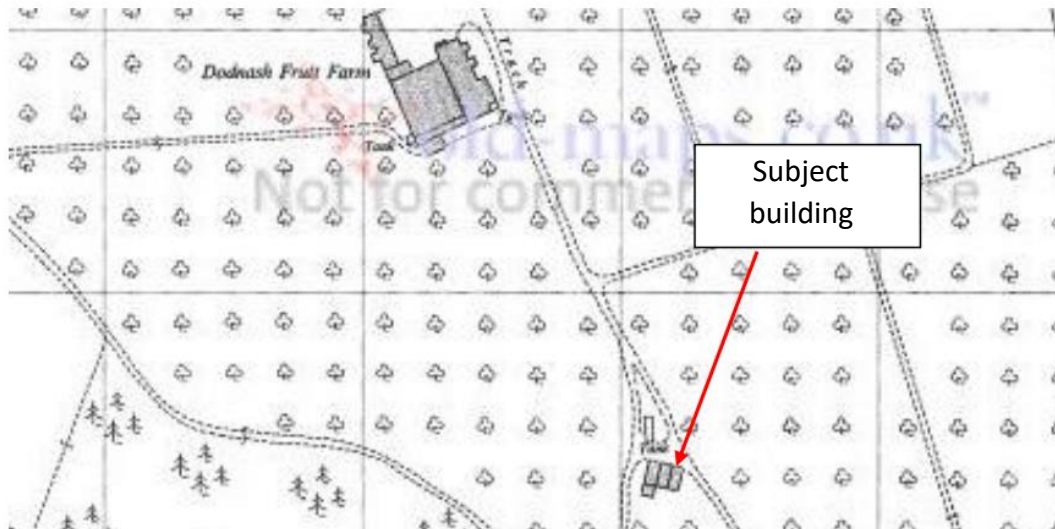
- 1.1 This Planning Statement has been prepared on behalf of Ms Sandra Bond of Dodnash Fruit Farm, and is submitted in support of a planning application for the replacement of an agricultural storage building which is sited to the south of the site.
- 1.2 This statement should be treated as forming part of the application, and includes details on the site and its surroundings, the intended scheme and how it relates to adopted planning policies. Although the Town and Country Planning (Development Management Procedure) (England) (Amendment No. 2) Order 2013 removed the requirement for Design and Access Statements to be submitted with minor planning applications, this statement is submitted to explain the rationale behind the development to assist the Local Planning Authority in making its decision.

2.0 Site and Surroundings

- 2.1 Dodnash Fruit Farm comprises around 30 hectares which is used for fruit-growing purposes and for the livery of 22 horses. The applicant has run the holding since acquisition in 1991. The building is spatially remote from other buildings with a cluster of buildings to the North including a converted agricultural building to 3no. units approved under B/15/00530. There is also another converted building (converted under formal planning permission that is tied to a person working on the farm under B/12/01009) that is associated with the farming business as part of this cluster.
- 2.2 The site consists of a detached single storey agricultural building, part of Dodnash Fruit Farm, towards the South of the site. The fruit farm is to the North, and an associated cluster of former agricultural buildings to the North, to the South of this cluster, surrounding the building in question is part equine and part sheep grazing and hay meadows.
- 2.3 The site is situated on land included within the extension to the Suffolk Coasts & Heaths AONB.
- 2.4 The emerging Joint Local Plan continues to categorise Bentley as a 'Hinterland Village' where the scale and location of development will depend upon the role of settlement in the

settlement hierarchy as well as “the spatial distribution, the capacity of existing physical and social infrastructure or new/ enhanced infrastructure, as well as having regard to the natural, built and historic environment.” The Plan identifies a settlement boundary around Bentley “in order to demonstrate the extent of land which is required to meet the development needs of the Plan”.

- 2.5 The Place Maps and Policies of Part 3 of the emerging Local Plan identify key landscape values attributed with Bentley. This includes Ancient Estate Farmlands, Ancient Estate Claylands, Rolling Valley Farmlands and Ancient Woodland in the immediate surrounds of the settlement, as well as the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) in the south and south-west.
- 2.6 The site has benefitted from a Defra-funded ‘Farming in Protected Landscapes’ (FiPL) programme which runs until March 2025. The programme supports farming and land management projects in England’s Protected Landscapes that make improvements for nature, climate, people and place. A programme of tree thinning and pruning has enabled a commercially-viable crop to be harvested which saw the orchards preserved in the landscape. The farm is now able to harvest fruit for sale and to produce organic juice.
- 2.7 The farm has also renovated three ponds which attract great-crested newts, hedge and woodland/shrub planting attract turtledoves and housing for hedgehogs has been installed. Several beehives are positioned in the orchard to aid fertilisation and increase biodiversity.
- 2.8 This area is now managed as a wildlife zone together with the provision of a barn owl box in the nearby woodland.
- 2.9 The building in question appears to date from the 1950’s if not earlier and is present on a 1958 Ordnance Survey map.



3.0 Relevant Planning History

3.1 A prior approval application was validated by the Council on 21st July 2019 under reference DC/19/03023. On 13th September 2019 it was determined that the prior approval was required and subsequently granted for a change of use of the agricultural building to a dwellinghouse (Class C3), and for Associated Operational Development Town and Country Planning (General Permitted Development) Order 2015 Schedule 2, Part 3, Class Q - Conversion to form 1No dwelling.

3.2 Whilst there is extensive planning history on the wider site, aside from that referred to in 3.1, there is no other relevant planning history on the subject building.

4.0 Policy Context

National Guidance

4.1 The National Planning Policy Framework 2023 advises that in determining planning applications for residential development, local planning authorities should consider the Development Plan Policies and all other material considerations. Local planning authorities should follow the approach of the 'Presumption in Favour of Sustainable Development' and that development which is sustainable can be approved without delay. It emphasises the

need to plan positively for appropriate new development; so that both plan-making and development management are proactive and driven by a search for opportunities to deliver sustainable development, rather than a barrier.

- 4.2 The ‘development plan’ for Babergh and Mid Suffolk comprises, in part, Section 1 of the Joint Local Plan with Section 2 planned for public consultation in Spring/early Summer 2024. It is anticipated that the Supplementary Planning Documents will be adopted by the end of 2026.

Section 1

SP03	<p>The sustainable location of new development</p> <p>Outside of the settlement boundaries, development will normally only be permitted where c) it is in accordance with one of the policies of this Plan listed in Table 5 [LP22 (1) ‘new agricultural buildings where there is demonstrable evidence to justify the need for them’].</p>
SP09	<p>Enhancement and Management of the Environment</p> <p>The Councils will require development to support and contribute to the conservation, enhancement and management of the natural and local environment and networks of green infrastructure, including: landscape, biodiversity, geodiversity and the historic environment and historic landscapes.</p>
SP10	<p>Climate Change</p> <p>The Councils will require all development to mitigate and adapt to climate change.</p>
LP15	<p>Environmental Protection and Conservation</p> <p>Development proposals must demonstrate appropriate consideration of the efficient and effective use of resources/land previously developed land will be prioritised.</p>
LP16	<p>Biodiversity & Geodiversity</p>

	<p>Development must protect designated land and, where known, potentially designated sites. Further, it must protect and improve sites of geological value and in particular geological sites of international, national and local significance.</p>
LP17	<p>Landscape</p> <p>A development must integrate with the existing landscape character of the area, be sensitive to the landscape and visual amenity impacts (including on dark skies and tranquil areas) on the natural environment and built character; and consider the topographical cumulative impact on landscape sensitivity.</p>
LP18	<p>Area of Outstanding Natural Beauty</p> <p>The Councils will support non-major development within the AONBs and development within the setting of the AONBs that gives great weight to conserving and enhancing the landscape and scenic beauty; that integrates positively with the character of the area and reinforces local distinctiveness of the AONBs; that is sensitive to the natural and built landscape and visual impacts (including on dark skies and tranquil areas); that demonstrates special regard to conserving and enhancing landscape character, landscape values and heritage assets in the AONBs; and that conserves the distinctiveness of the AONBs (including quality views).</p>
LP22	<p>New Agricultural Buildings</p> <p>There must be demonstrable evidence to justify the need for any proposals for new agricultural buildings outside settlement boundaries. The suitability and sustainability of proposals for agricultural buildings outside settlement boundaries will be subject to; the provision of safe and suitable access for all, including the mitigation of any significant impacts on the transport network and highway safety to an acceptable degree; the nature of any proposal in the locality and its relationship and impacts with surroundings (including but not limited to landscape, design, habitats sites and protected species, heritage assets and their settings); the impact on the amenity of nearby residential occupiers; and the scale, nature and extent being proportionate to the purpose, function and relationship to any existing uses.</p>

LP23	<p>Sustainable Construction and Design</p> <p>All new development is required to minimise its dependence on fossil fuels and to make the fullest contribution to the mitigation of climate change through adopting a sustainable approach to energy use</p>
LP26	<p>Water resources and infrastructure</p> <p>The proposal will not result in any adverse effect (either through construction and / or operation) on the integrity of the Protected Habitats Sites and designated AONBs. Source Protection Zone III</p>

Supplementary Planning Document; Bentley Neighbourhood Plan (2022)

BEN3	<p>Development Design</p> <p>Planning applications must, as appropriate to the proposal, demonstrate how they meet the general design principles set out in paragraph 6.5 of this Plan and satisfy the requirements of the Development Design Checklist in Appendix A of this Plan and take account of the Bentley Design Guide (November 2019).</p>
BEN6	<p>Development Affecting the Area of Outstanding Natural Beauty</p> <p>Any development should be sensitively designed and located taking into account the need to conserve and enhance the landscape and scenic beauty in the AONB as well as the consideration of wildlife and cultural heritage. Development proposals within the Area of Outstanding Natural Beauty, or within its setting, should be informed by landscape and visual impact assessment to assess and identify potential impacts and to identify suitable measures to avoid or mitigate these impacts. Proposals should include measures that enable a scheme to be well integrated into the landscape and enhance connectivity to the surrounding green infrastructure and Public Rights of Way network.</p>
BEN7	<p>Protecting Bentley's Landscape Character</p>

	Proposals must, proportionate to the development, demonstrate how the landscape characteristics of the site and its vicinity have been considered in preparing the scheme.
BEN8	<p>Protecting Habitats and Wildlife corridors</p> <p>Proposals that are likely to have an adverse impact on designated sites, priority habitats and species and protected species will not normally be permitted except where it can satisfactorily be demonstrated that the benefits of the development clearly outweigh any adverse impact. Development proposals should avoid the loss of, or substantial harm to, hedgerow, field boundary, mature or veteran trees and other natural features such as ponds.</p>

5.0 Proposed Development

- 5.1 The application proposes replacing the agricultural storage building, subject of DC/19/03023. The building is constructed in a soft red brick, has a cement-sheet profile roof and timber-framed windows. Extensive areas of render-repair have been carried out and in places the brickwork is held together with metal plates. It is approximately 5.1m to the ridge and has eaves of 3m. It is 14.3m wide, having three bays which have historically been used to facilitate vehicle storage; the main building is 9.3m deep with the addition of a 4.7m deep by 4.8m wide mono-pitched extension to the southwest corner.
- 5.2 The replacement building would be in the same location; clad in Yorkshire Boarding and concrete panels with a box-profile roof in Juniper Green. The building would be 4.8m to the ridge and 3.6m to the eaves. It would be 18.1m wide and 9m deep and the three-bay design would be repeated.

Location of Agricultural Development

- 5.3 In accordance with Policy SP03 Table 5 [LP22 (1) LP15 2 a. and LP22 1) new agricultural development is appropriate subject to there being demonstrable evidence to justify the need for them. The building has historically been used for agricultural storage purposes but severe

damage to the roof has resulted in a rapid decline in the structural stability of the building as a consequence of rainwater ingress.



- 5.4 The applicant actively supports the work of The Rare Breeds Survival Trust and is keen to encourage genetic diversity; for these reasons she chose a rare breed of sheep. All Castlemilk Moorits are descended from a single flock of ten ewes and two rams, and the British Rare Breeds Survival Trust lists the breed as "at risk", having a maximum of 1500 registered animals. In 2023 the applicant successfully bred her first flock of Castlemilk Moorit sheep using the building as a lambing shed. It is planned that the sheep will put out to pasture in the surrounding orchards, thereby maintaining the organic approach to the fruit growing. The replacement building would also serve as a watertight-area for hay storage; currently the hay is wrapped in unrecyclable plastic sheeting.

Design

- 5.5 In accordance with Policy LP22 2), the requirements contained within BEN3, the general design principles set out in paragraph 6.5 of the Bentley Neighbourhood Plan and satisfy the requirements of the Development Design Checklist in Appendix A of this Plan.

a) Access/Transport

The proposal (of itself) would not result in or cause any additional vehicular movements and would therefore have a negligible impact, if any, on the wider highway network.

b) Impact on Surroundings, the Natural and Heritage Environment

The proposal is replacing a structure which has been in-situ for at least seventy years. The replacement structure has an overall ridge height which is 0.3m lower than the existing building, it would also be 0.3m shallower in depth. The justification behind the proposed building being around 4m wider than the existing is the removal of the rear projection where it serves little practical purpose and relocating it to the side. For these reasons it is considered that the scale, height, design and siting of the proposed building and, in the absence of heritage assets in the locale, would have an appropriate relationship with its surroundings.

c) the impact on the amenity of nearby residential occupiers

The proposed building forms part of a wider working agricultural enterprise; the closest residential property is the applicant's own property and this is some 163m from the building – the next nearest 'unassociated' domestic properties are approximately 172m away. The separation distances between the proposal and the nearby residential occupiers are extensive and for this reason it is unlikely that their amenity would be materially harmed.

d) proportionate to the purpose, function and relationship to any existing uses

As described above, the proposal is to replace an existing agricultural building with a dual-purpose watertight structure for hay-storage in addition to place for the breeding of lambs. Livestock would then work in the orchards keeping grass levels down.

Biodiversity & Geodiversity, - Protecting Habitats and Wildlife corridors

5.6 Policies SP09, LP16 and BEN8 requires development to support and contribute to the conservation, enhancement and management of the natural and local environment and networks of green infrastructure, including: landscape, biodiversity, geodiversity and the historic environment and historic landscapes. Further, it must protect and improve sites of geological value and in particular geological sites of international, national and local significance.

5.7 An analysis of Magic Maps indicates that the site is located within SAC (Special Area of Conservation), SPA (Special Protection Area), a Ramsar Site and an Area of Outstanding Natural Beauty. The orchards were assessed last year and more are in the process of being added to the Magic Map as Traditional Orchards.

5.8 The habitats of SAC, SPA and Ramsar and the species they hold are protected under the Conservation of Habitats and Species Regulations 2017. The Essex coastline is one of importance for birds and their habitat; it is home to internationally important numbers of breeding and non-breeding birds and their coastal habitats. The increased visitor pressure associated with new residential development to these habitats requires mitigation and this is sought through a financial contribution. The application does not propose new residential development.

5.9 As previously denoted the barn will be used for lambing of a rare breed of sheep which of itself contributes to the conservation of one particular breed of sheep. The sheep would primarily work in the orchards maintaining grass-heights and reducing weed cover between the trees. Breeding her own sheep has a dual-benefit, not only the potential contribution of stock to the breed but also having the sheep work the land means that the use of potentially-harmful pesticides can be eradicated; in turn this contributes to the farm's organic ethos. The eradication of pesticides would contribute to the conservation of local biodiversity. It is acknowledged that the proposal does not propose the rebuilding of the existing structure; notwithstanding this there is ample scope for the bricks to be re-used on the site or even sold. The proposal does not result in or require the loss of any trees or hedges which contribute to the character of the landscape. By reason of not exceeding the existing building height, the proposal relates well to local topography and landscape features, including prominent long-distance views.

Climate Change, Environmental Protection & Conservation, Sustainable Construction

5.10 In requiring development proposals to be proactive in their approach to mitigate and adapt to climate change Policies SP10, LP15 2. b. and LP23 require consideration of matters such as sustainable design and construction, delivery of a decentralised energy system powered by renewable or low carbon sources. Adaptations to protect developments from flood risk, coastal change, lack of water supply, biodiversity, landscapes, extreme winter weather and overheating from rising temperatures need also to be considered. As mentioned above, the applicant has considered the demolition and rebuilding of the existing structure – in this regard it would result in an extremely expensive and resource-heavy solution.

5.11 Sustainable building materials includes any and all products that are selected, produced and integrated efficiently, in order to minimise environmental impact. This includes using materials that have been created using renewable or recycled materials, produced with minimal waste output and those that are designed for long-term use and reusability. Subject to maintenance, timber is a material which can withstand weathering, corrosion and degradation (unlike the existing soft brick). examples of sustainable alternatives to materials include approved timber and natural fibre re-enforced concrete which could potentially be used in the new building. Although it would be a token gesture, the use of water-butts to collect rainwater run-off could be implemented.

Area of Outstanding Natural Beauty (AONB)

5.12 In order to be viewed more favourably, Policies LP17, LP18 and BEN6 require that submissions should propose a development which conserve and enhance the landscape and scenic beauty, integrates positively with the character of the area and is sensitive to the natural and built landscape and visual impacts (including on dark skies and tranquil areas).

5.13 The Suffolk Coast & Heaths AONB was designated in 1970 and spans a 60 km stretch of some of the least developed coastline in south-eastern England. The largest section of the AONB follows the Suffolk coastline, stretching from Kessingland in the north to Shotley Peninsular (of the River Stour estuary) in the south. Although separated by Felixstowe and the A14, there are additional (non-connected) sections which follow the River Orwell and the northern banks of the River Stour.

5.14 The Suffolk Landscape Character Assessment characterises the rural landscape as “ancient estate farmlands” – the key characteristics of which are:-

- A plateau of easily farmed rich loams with a planned estate layout and blocks of ancient woodland, with
- Flat central spine of land, with sloping sides dissected by river valleys
- Deep loamy soil that originated as wind-blow sediments from glacial sources
- Large-scale arable blocks divided into rectilinear fields
- Substantial number of ancient woodlands
- Suckering elm hedges with pollard oaks; also holly hedges
- Network of parks and designed landscapes
- Nucleated villages, but with some dispersed farmsteads and clusters of houses
- Localised development pressures.

The Neighbourhood Plan recognises the value of the landscape in and around Bentley Parish, stating that it is “essential that new development should have regard to the character of the

surrounding landscape and, in particular, to the setting of the nationally significant landscape of the Suffolk Coast and Heaths AONB.

- 5.15 Policy BEN1 (Spatial Strategy) focusses growth within the designated settlement boundary, thereby ensuring that the undeveloped rural countryside and AONB setting is preserved and remains largely undeveloped.
- 5.16 As previously stated, the submission proposes the replacement of an existing structure. The table below provides comparisons between the existing and proposed built form:-

	Existing	Proposed
Height to ridge	5.1m	4.8m
Height to eaves	3m	3.6m
Width	14.3m	18.1m
Depth	9.3m + 4.7m	9m
Shape of footprint	L-shaped	rectangular
Ground coverage	155.6sqm	162.9sqm
Walls	Soft Red brick	Yorkshire Boarding and concrete panels
Roof	Corrugated profile cement sheets	concrete panels with a box-profile roof in Juniper Green

- 5.17 The proposed building is 30cm lower than the existing and, for the most part, 0.3m shallower. The increase in width is as a result of the projection to the southwest being removed and 'added' to the southeast elevation where it will have a considerably better purpose.
- 5.18 In proposing a reduction in the overall roof height in addition to a reduction in the depth of the building; it is considered that a visual impact assessment of the potential impacts of the development (the impact of a larger building in terms of height, width, depth and resultant scale) identifies suitable measures to avoid or mitigate these impacts. For these reasons it is considered that the siting and design of the replacement barn conserves and enhance the landscape and scenic beauty in the AONB as well as the consideration of wildlife and cultural heritage.

Landscape

- 5.19 Both policies LP17 and BEN7 require development to conserve and landscape the landscape character by integrating with the landscape – being sensitive to the landscape.
- 5.20 The early origins of settlement within the Parish have been influenced by the underlying geology and drainage system.
- 5.21 Bentley Parish is covered by National Character Area - NCA 82 Suffolk Coast and Heaths. The landscape of Bentley Parish is described in the Suffolk County Assessment which divides the area into four character types (Rolling Valley Farmlands, Ancient Estate Farmlands, Ancient Estate Claylands and Rolling Estate Farmlands). The application site is located within character-type Ancient Estate Farmlands.
- 5.22 The description for this character type highlights that Bentley is a very anciently-settled area, with the existing settlement pattern being mainly one of nucleated villages, but with some dispersed farmsteads and clusters of houses. The area has a substantial number of ancient woodlands, some up to 80ha in size. In the west there is the close grouping of Great and Little Martin's Woods (probably named after a French abbot who owned them c.1200), Dodnash Wood and Holly Wood (recorded as the 'wood of Hulney' in the late 12th century) in Bentley and Old Hall Wood on Bentley's northern boundary.
- 5.23 Management Guidelines for the landscape type note that 'The settlement pattern in the Ancient Estate Farmlands has a strong tendency towards clustered villages, surrounded by a scattering of individual farmsteads. Wherever possible this clear distinction should be maintained. In relation to large scale agricultural buildings in open countryside, it states that: 'The right choice of siting, form, orientation and colour of these buildings can make a considerable contribution to mitigating their impact. The plantations, shelterbelts, and tree lines found throughout this landscape provide opportunities to design locally appropriate planting schemes to reduce the visual impact further.'

5.24 This landscape appraisal highlights the following:-

Special Qualities to Conserve and Enhance	Changes to Avoid
a Historic network of narrow, winding, rural and sunken lanes	Development on upper valley slopes which can be visually intrusive and where vertical elements can appear exaggerated
Areas of ancient woodland creating wooded horizons and backdrops	Development which masks the subtle changes in topography at the edge of the plateau
Individual rural buildings associated with groups of trees or seen with wooded backdrop	
Views across the rural landscape to individual or small groups of vernacular buildings	

The proposal both conserves and enhances those special qualities that make up Bentley Parish and does not propose any of the changes to avoid.

Water Resources and Infrastructure

5.25 Policy LP26 requires that the proposal will not result in any adverse effect (either through construction and / or operation) on the integrity of the Protected Habitats Sites and designated AONBs. The Water Framework Directive (WFD) was first published in December 2000; A primary WFD objective is to ensure ‘no deterioration’ in environmental status.

5.26 The existing building does not have a water source and it is not proposed to provide water to the replacement building. For these reasons the new building will not have an adverse effect on the AONB.

6.0 Conclusion

6.1 In conclusion, it is considered that the proposed development will ensure the following: -

- a proposal, the need for which has demonstrable evidence to justify its need, which is in a location supported by policy
- support and contribute for the conservation, of the natural and local environment, including: landscape, biodiversity and geodiversity
- a proposal which considers sustainable design and construction, considers sustainable alternatives to materials
- the siting and design of the replacement barn conserves and enhance the landscape and scenic beauty in the AONB as well as the consideration of wildlife and cultural heritage.
- A development that conserves and enhances those special qualities that make up the characteristics unique to Bentley Parish and does not propose any of the changes to avoid
- That there is no adverse effect (either through construction and / or operation) on the integrity of the Protected Habitats Sites and designated AONB
- That there is no adverse impact on designated sites, priority habitats and species and protected species nor loss of, or substantial harm to, hedgerow, field boundary, mature or veteran trees and other natural features such as ponds
- No additional vehicular movements and a negligible impact on the wider highway network
- the amenity of nearby residential occupiers would not be materially harmed as a result of significant separation distances.

As such, the development should be embraced by the Council in accordance with its adopted policies.