

Planning, Design and Access Statement



Willow Grove Farm, Station Road,
Lakenheath, Suffolk, IP27 9AA

Change of Use of agricultural unit to
Use Class B2 General Industrial

Date	April 2024
Site Address	Willow Grove Farm, Station Road, Lakenheath, Suffolk, IP27 9AA
Proposal Description	Change of Use of agricultural unit to Use Class B2 General Industrial (retrospective)
Local Planning Authority	West Suffolk Council
Applicant	Vision Architectural Glazing Installations Ltd.

Author: DKR



RTPI

Chartered Town Planner

Affiliate Member

IEMA

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1. INTRODUCTION

- 1.1 This statement has been prepared by DKR Rural Planning on behalf of Vision Architectural Glazing Installations Ltd. (The Applicant) in support of an application to West Suffolk Council (LPA), for; *Change of Use of agricultural unit to Use Class B2 General Industrial (retrospective)*.
- 1.2 This submission is accompanied by:
- Forms and Certificates;
 - Site Location Plan and Block Plan (dated 28.03.24);
 - Existing Floor Plans (drawing number 02 dated 28.03.24);
 - Existing Elevations (drawing number 03 dated 28.03.24);
 - Proposed Floor Plans (drawing number 04 dated 28.03.24);
 - Proposed Elevations (drawing number 05 dated 28.03.24);
 - West Suffolk Council Biodiversity Checklist;
 - Flood map for planning (**Appendix 1**);
 - Impact of Development on Sites of Biodiversity and Protected Species – HRA Screening (**Appendix 2**)’
 - West Suffolk Council Land Contamination Questionnaire; and
 - Groundsure Enviro Insight Contamination Report (reference GS-6KR-KL4-3ID-MGL dated 11.04.24).
- 1.3 This planning statement incorporates design and access information and demonstrates the acceptability of the proposal against Local and National planning policy.

2. THE SITE

- 2.1 The site is located approximately 1.5km to the north east of Lakenheath, approximately 7km from Brandon to the east, north – east and 11km from Mildenhall to the south.
- 2.2 The site is accessed via the B1112 Station Road which lies to the immediate east with onward A Road links via Mildenhall and Brandon (A11, A1065 and A134 respectively).
- 2.3 The site location is shown at **Figure 1** below:



Figure 1 - Site Location (circled in red)

2.4 The application site is shown circled in red at **Figure 2** below, which is an extract from the Suffolk County Council Recommended Lorry Route Network Map¹. The site is on a Green local access route; roads or parts of roads serving as access to a specific location. With ready linkages to the shown Blue 'zone distribution lorry routes' and onward Red 'strategic lorry routes. Green, Blue and Red lorry routes are the preferential routes for lorry movements:

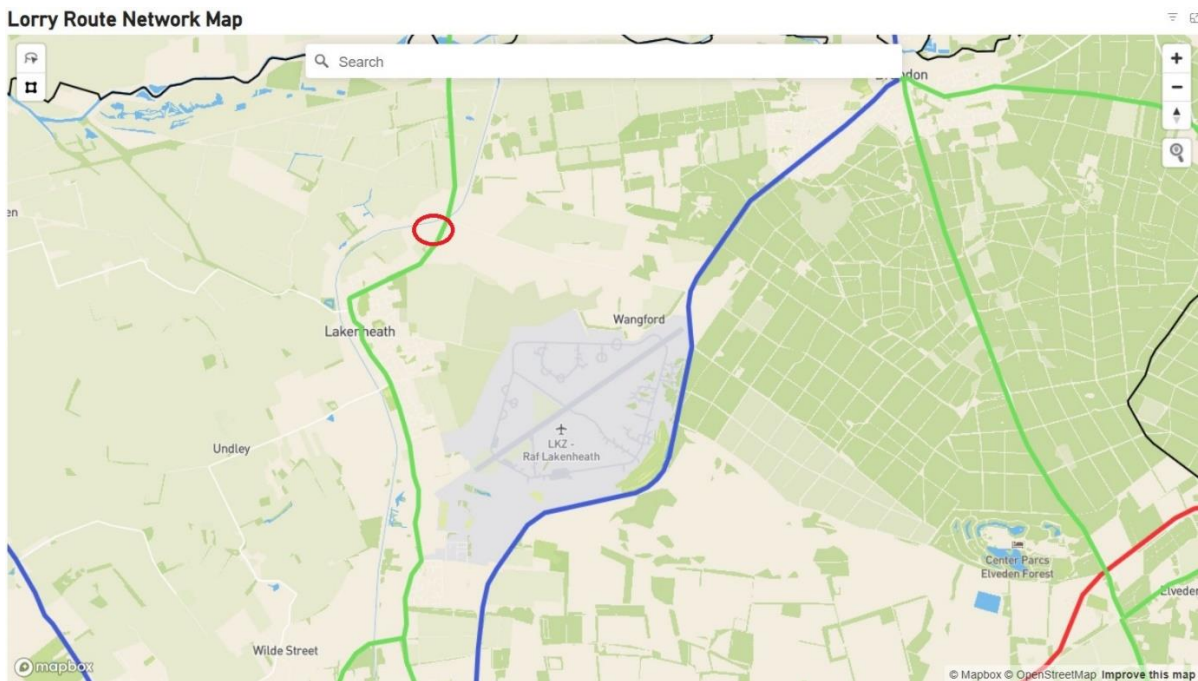


Figure 2 – Recommended Lorry Route Network Map (site circled in red)

¹ [Recommended Lorry Route Network Map - Suffolk County Council](#)

- 2.5 The site is within Flood Zone 1 and at the lowest probability of flooding and in an area not prone to Surface Water Flooding, see **Appendix 1** to this statement for further details.
- 2.6 There are no proximate Listed Buildings or Scheduled Ancient Monuments or historic environment constraints such as Conservation Areas, Registered Parks and Gardens or Battlefields.
- 2.7 According to the Government's Magic Map², the closest ecological designation is Pashford Poor's Fen, Lakenheath SSSI³ 450m to the south – east. Pashford Poor's Fen is designated for its assemblage of plant species and is primarily vulnerable to water pollution, abstraction and water level change. The separation afforded from the application site and the change of use nature of the application, ensure that the designation will not be affected.
- 2.8 Thereafter, Breckland Farmland SSSI lies some 1.5km to the north east of the site, with the Breckland Special Protection Area and Special Area of Conservation, beyond, approximately 3.8m to the east (measured at the closest points).
- 2.9 A review of the West Suffolk Council 'Find my nearest' map⁴ confirms that the site lies within the Stone Curlew 1500m buffer and Stone Curlew nesting 1500m buffer which extends around SSSI's to the east and north east of the application site.
- 2.10 The Site Location Plan is replicated at **Figure 3** below for ease of reference:

² [Magic Map Application \(defra.gov.uk\)](https://magicmap.defra.gov.uk/)

³ <https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=s1000899>

⁴ <https://maps.westsuffolk.gov.uk/>



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Figure 3 - Site Location Plan

The Application site comprises an agricultural building and former farmyard which now serves the established uses on site, as detailed at **Section 3** below. A photograph of the application site is shown at **Photo 1** below:



Photo 1 – Application Site, February 2024

3. RELEVANT PLANNING AND BUILDING CONTROL HISTORY

Reference	Planning Application	Decision
DC/22/1034/FUL	Planning application - a. installation of six bell tents; b. external building to house wash facilities with canopy	Approved 15/11/23
DC/23/1202/FUL	Planning application - change of use of existing building from agricultural use to hire and sale of agricultural and construction equipment and machinery (Sui Generis)	Approved 07/03/24
DC/23/0570/FUL	Planning application - Change of use of land for the stationing of a cabin and installation of canopy and outdoor seating for use as a cafe/coffee shop	Approved 08/03/24

Table 1 - Relevant Planning History

4. PROPOSAL

- 4.1 The proposal is for the Change of Use of a former agricultural unit to Use Class B2 General Industrial; the application is retrospective, with the use having commenced in November 2023.
- 4.2 The unit is 802m² with a height to the eaves of 3.7m and 6.2m to the ridge height.
- 4.3 The Applicant⁵ utilises the building for cutting, welding and panel assembly of facades, roof glazing and glass atriums as well as the storage of units ahead installation. The Lakenheath site complements the Applicants existing operation in Hildersham, Cambridgeshire and the servicing of clients regionally and indeed nationally.
- 4.4 The proposal, whilst retrospective, relates only to change of use as the Applicant utilises the same void which was previously used for agricultural purposes, with no internal amends, engineering works or development required to facilitate the change of use.

5. RELEVANT PLANNING POLICY

- 4.5 The 'development plan', in this instance, including the most relevant policies, comprises:

NPPF 2023

- Chapter 2. Achieving sustainable development;
- Chapter 6. Building a strong, competitive economy; and
- Chapter 11. Making effective use of land.

West Suffolk Joint Development Management Policies Document (February 2015)

- Policy DM1 Presumption in Favour of Sustainable Development;
- Policy DM2 Creating Places Development Principles and Local Distinctiveness;
- Policy DM5 Development in the Countryside;
- Policy DM10 Impact of Development on Sites of Biodiversity and Geodiversity Importance;
- Policy DM11 Protected Species;
- Policy DM31: Farm Diversification;
- Policy DM33 Re-use or Replacement of Buildings in the countryside; and
- Policy DM46 Parking Standards.

⁵ [Homepage | Vision Architectural Glazing Installations Ltd](#)

Rural Vision 2031 (September 2014)

- Policy RV1: Presumption in favour of Sustainable Development;
- Rural objectives - Objective 3, Objective 4, Objective 5 and Objective 6; and
- Jobs and Economy - Aspiration 4 and Policy on Rural Employment Areas.

St Edmundsbury Core Strategy (December 2010)

- Core Strategy Policy CS1 - St Edmundsbury Spatial Strategy;
- Core Strategy Policy CS2 - Sustainable Development; and
- Core Strategy Policy CS3 - Design and Local Distinctiveness.

6. PLANNING POLICY ANALYSIS

- 6.1 This application is made under section 73A of the Town and Country Planning Act 1990⁶, regardless of the retrospective nature of the application, it should be considered 'in the normal way' as set out in Planning Policy Guidance Paragraph: 012 Reference ID: 17b-012-20140306⁷.
- 6.2 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 planning applications should be determined in the context of the Development Plan and its policies unless material considerations indicate otherwise.

National

- 6.3 Section 6 of the NPPF states: *Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development...* (paragraph 85).
- 6.4 NPPF paragraph 88. states: Planning policies and decisions should enable: a) *the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, beautiful new buildings;* and at Paragraph 88. b) *the development and diversification of agricultural and other land-based rural businesses.*
- 6.5 NPPF paragraph 89. then confirms (underlining added for emphasis): *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.*

⁶ <https://www.legislation.gov.uk/ukpga/1990/8/section/73A>

⁷ [Enforcement and post-permission matters - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/281212/Enforcement_and_post-permission_matters_-_GOV.UK.pdf)

6.6 Paragraph 88. is directly applicable to the proposal which supports the existing uses at Willow Grove Farm as set out at **Section 3** above. Each constituent point of paragraph 89. is considered in turn below:

sensitive to its surroundings

6.7 Willow Grove Farm has diversified from a solely agricultural site to now include tourism, Sui Generis (sale of agricultural and construction equipment and machinery), a coffee shop and equine uses in addition to agricultural field units and buildings. The existing uses and neighbouring developments are evident on publicly available aerial photograph as replicated below:



Figure 4 - Aerial Photography (June 2023)

6.8 As replicated from the Council's My Maps function at **Figure 5** below, residential, mixed use and employment allocations border the application site to the south-west of site; 500m, 230m and 80m away, respectively. Neighbouring businesses accessed via Station Road and located to the immediate south and north include:

- Lakenheath Fabrications Limited;
- Packaging Needs;
- M Yardy Engineering;
- Sunrise produce Ltd;
- JM vehicle and fabrication;
- Rands & Wilson Feeds Ltd;
- ScanStone Potato Systems; and
- Versatile Equipment.

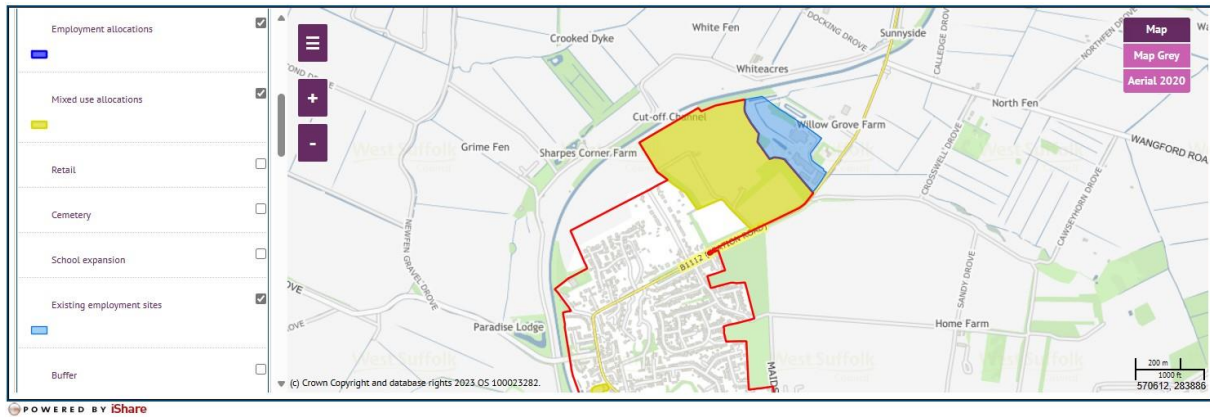


Figure 5 - West Suffolk Local Plan Allocations

6.9 The change of use nature of the application, utilising the same void as already existed in agricultural use, the proximate businesses and neighbouring mixed use and employment allocations ensure that the application is sensitive to its surroundings.

unacceptable impact on local roads

6.10 As already shown at **Figure 2** above, the application site is on a recommended lorry route, a search of CrashMap⁸ data for the last 24 years confirms there has only been two ‘slight’ incidents, just to the north of the site entrance, one ten years ago and the other twenty years ago, as can be seen at **Figure 6** below:

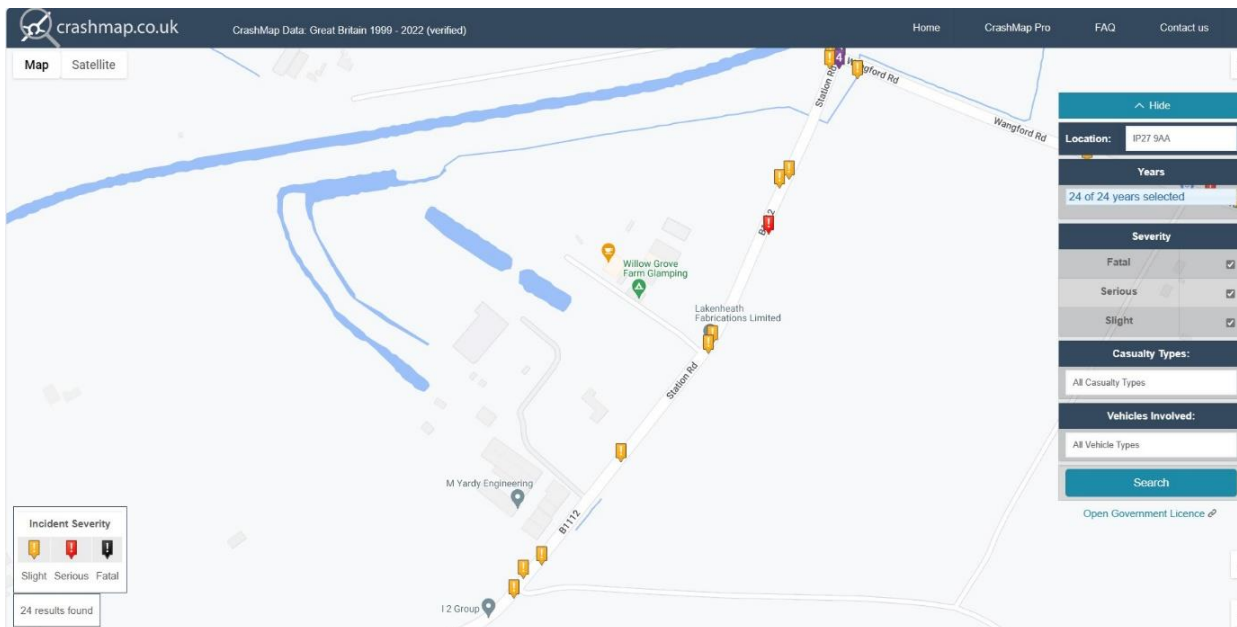


Figure 6 – CrashMap extract

6.11 The agricultural use of Willow Grove Farm associated with the building had established vehicular movements, including the movement of tractors and slow-moving vehicles, which are in effect ‘traded off’ against the now B2 light industrial use. The agricultural

⁸ [CrashMap - UK Road Safety Map](#)

movements could be seasonally a lot more frequent and involving much larger, slow moving vehicles, in excess of the vehicular movements associated with the B2 use.

- 6.12 Accordingly, the proposal will not cause an unacceptable impact on local roads.

exploits any opportunities to make a location more sustainable

- 6.13 The wider Willow Grove Farm complex utilises electric vehicles and former agricultural buildings have been upgraded and the farm diversified to improve building performance.

- 6.14 The location on a lorry route network, a short distance from designated mixed use and employment sites within Lakenheath and proximate to similar B2 business determine the location is sustainable for the proposed use.

The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist

- 6.15 The former agricultural use excludes 'previously developed land' status as defined in Annex 2: Glossary to the NPPF⁹. The site is, however, developed – with hardstanding access and various buildings already in situ. As already established, the site is well related to the existing settlement of Lakenheath bordering an existing employment allocation with further allocated land connecting Lakenheath to the south west.

- 6.16 Accordingly, the proposal complies with Chapter 6. of the NPPF.

Local

- 6.17 The West Suffolk Local Plan (Joint Development Management Policies Document February 2015) is now several iterations behind the NPPF; however, it does contain Policies DM10, DM11, DM31 and DM33 of particular relevance to this proposal, each of which is considered in turn below. Compliance with Policy DM46: Parking Standards is evidenced on the submitted application forms and not considered further here.

- 6.18 Vision 5 of the Core Strategy confirms; *Lakenheath will perform more strongly as a key service centre, with enhanced retail and service provision and jobs to meet the needs of its catchment population.* Policy CS 6 similarly promotes 'job growth' including via the rural economy. The proposal employs 3no. full time members of staff, with the onward benefit to the rural/ agricultural sector associated with the business. Policy CS 10 supports; The diversification of existing rural enterprises and the development of new enterprises. As already stated, the proximate allocation Site SA8(b) – Land north of Station Road of the Site Allocations Local Plan and proximate business reflect the appropriateness of the location for employment development.

- 6.19 Policy DM5 of the Joint Development Management Policies Document (Development in the Countryside) supports the 'economic growth and expansion of all types of

⁹ [National Planning Policy Framework - Annex 2: Glossary - Guidance - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

business and enterprise', subject to three bullet-pointed criteria, replicated below, all of which the proposal complies with:

- it will not result in the irreversible loss of best and most versatile agricultural land (grades 1, 2 and 3a);
- there will be no significant detrimental impact on the historic environment, character and visual amenity of the landscape or nature conservation and biodiversity interests as there are no historic designations on site; and
- there will be no significant adverse impact on the local highway network.

6.20 The proposals comply with Policy DM5, offering in-principle support for the change of use. Moving to the most relevant Local Plan policies:

- Policy DM10 Impact of Development on Sites of Biodiversity and Geodiversity Importance

6.21 A full HRA Screening is offered at **Appendix 2** to this statement, this document assesses the potential impact of the change of use on designated ecological sites and the protected species therein.

6.22 The HRA Screening has regard to recent planning approvals and the corresponding Natural England and Local Authority Ecology Officer HRA responses are included for ease of reference.

6.23 The HRA Screening concludes: Having reviewed the potential for Likely Significant Effects to the qualifying features of Breckland SPA it is concluded that the change of use will not result in Likely Significant Effects to the qualifying species associated with the Breckland SPA designation or any other European Protected Sites locally either in isolation or in combination with other equivalent plans or projects locally. No Likely Significant Effects.

- Policy DM11 Protected Species

6.24 The proposal, whilst retrospective, relates only to change of use as the Applicant is utilising the same void which was previously used for agricultural purposes, with no internal amends, engineering works or development required to facilitate the change of use.

6.25 The development does not impact habitat, through loss or degradation within the red line boundary – the application area comprises existing sealed surfaces (concrete, hardstanding and hard-pack aggregate access track) and a modern agricultural building. It is not utilised by protected species, with no roosting or nesting opportunity for birds or bats, for example. The age of the building and light industrial use are not compatible with protected species such as breeding birds and/ or bats.

- 6.26 The building itself is assigned a zero score in the statutory biodiversity metric, meaning that this surfaces/ application site is exempted from the 10% net gain requirement and logically ecological assessment thereafter.
- Policy DM31: Farm Diversification
- 6.27 The last know use of the building subject to change of use was agricultural, however, as shown at **Section 3** and **Table 1** above, Willow Grove Farm has diversified considerably from solely an agricultural concern.
- 6.28 Willow Grove Farm remains a working farm, comprising two parcels of 5 hectares and 10 hectares in size respectfully, with arable concern is limited to an annual grass crop which is then stored for hay. The resulting hay is sold or used on the farm. Whilst primarily grassland the farm also grazes livestock with an annual arrangement with a dairy herd, aside from Willow Grove Farms own animals.
- 6.29 Willow Grove Farm operates under CPHnumber: 38/331/0519, Rural Payments – S0744447C115 4353V001 and DEFRA Customer reference number 1105488551.
- 6.30 Despite the ongoing farming concern, it is reasonable to consider that Willow Grove Farm has diversified such that farming is no longer the primary use, indeed farming activities are now subsidiary to the other established uses; tourism, Sui Generis (sale of agricultural and construction equipment and machinery), a coffee shop and equine. This presents a conflict with the first part of Policy DM31 criteria a. which prefers diversification remains ‘subsidiary’. The change of use does, however, comply with the second half of criteria a. in providing new employment opportunities and services for the local community.
- 6.31 In accordance with criteria b. the scale of the development is in keeping with the local character; indeed, the building is comparable with other onsite and at neighbouring sites (see **Figure 4** above).
- 6.32 As required by criteria c. the proposal re-uses an existing agricultural building.
- 6.33 The change of use does not involve a new building such that criteria d. is not triggered.
- 6.34 The closest dwelling is the site managers dwelling, Willow Grove Farmhouse, as an involved dwelling the occupants are used to the existing noise environment and amenity conditions of their workplace.
- 6.35 Biodiversity impacts are considered fully above and in full within submitted **Appendix 2** accordingly, compliance with criteria e. is also demonstrated.
- 6.36 Highways matters are considered in full at **paragraphs 6.10 – 6.12** above, with no compromise of highway safety or traffic flow anticipated, as required by criteria f.
- 6.37 No retail unit is proposed, meaning criteria g. is not relevant to this proposal.

- Policy DM33 Re-use or Replacement of Buildings in the countryside
- 6.38 As already demonstrated, the change of use complies with Policy DM33 criteria i. which supports B2 industrial uses where they would not 'create significant levels of traffic, particularly lorries, on rural roads'.
- 6.39 Given the change of use nature of the application, Policy DM33 a. and b. are not relevant.
- 6.40 As already established, the site is well related to the existing settlement of Lakenheath bordering an existing employment allocation with further allocated land connecting Lakenheath to the south west, making in compatible with its rural location, as required by Policy DM33 c.
- 6.41 Criteria d. in respect of employment levels and e. in respect of tourist accommodation are not relevant to this change of use application.
- 6.42 As already established, variously, the change of use will not give rise to unacceptable types or levels of traffic in accordance with criteria f.
- 6.43 Finally, criteria g. is not relevant as no amends or indeed development at all is required in respect of the change of use.

7. DESIGN AND ACCESS STATEMENT

- 6.44 The role of the Design and Access Statement is to provide an accessible and structured format detailing how the proposed development is a suitable response to the site and its setting and to demonstrate that it can be adequately accessed by prospective users.
- 6.45 This Design and Access Statement has been prepared having regard to the provisions of the national Planning Practice Guidance¹⁰ in addition to guidance contained within 'Design and Access Statements: How to read, write and use them' (CABE, 2007)¹¹.

Design

- 6.46 Appearance: the former agricultural barn is of standard appearance, with steel frame and roof as shown at **Photo 1** above.

Use

- 6.47 The change of use is from agricultural to Use Class B2 General Industrial.

Scale

- 6.48 The unit is 802m² with a height to the eaves of 3.7m and 6.2m to the ridge height.
- 6.49 The scale of the development would be in keeping with the local character; indeed, the building is comparable with other onsite and at neighbouring sites (see **Figure 4** above).

Layout

- 6.50 The submitted Site Location Plan and Block Plan (dated 28.03.24) shows the layout of both the agricultural building.

Landscaping

- 6.51 There are no trees onsite and any additional landscaping/ boundary treatment would be agreed with the Local Authority and subject to an appropriately worded condition.

Servicing

- 6.52 The application site benefits from all necessary utilities already serving Willow Grove Farm.

Access

- 6.53 Access is via the B1112 Station Road and the existing Willow Grove Farm vehicular access.

¹⁰ [Making an application - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

¹¹ [Design and access statements: how to write, read and use them \(designcouncil.org.uk\)](http://designcouncil.org.uk)

8. CONCLUSION

- 8.1 This statement has assessed the planning and associated impacts arising from the change of use of an agricultural unit to Use Class B2 General Industrial (retrospective).
- 8.2 The relevant planning constraints on site or proximate have been assessed, inclusive of the impacts on off-site ecological designations.
- 8.3 The acceptability of the proposal against Local and National planning policy has been demonstrated and the application should be approved without delay.