


RURAL DEVELOPMENT

SUPPLEMENTARY PLANNING DOCUMENT

April 2024



How to use this document

The document comprises of 10 chapters with each chapter covering a different topic. The best way to navigate through the document is by using the interactive contents. By clicking on a specific chapter in the contents, it will automatically take you to that part of the document. Moreover, if you want to go to a different section quickly, the easiest way is to click the home  symbol in the top right corner of the page. This will take you back to the contents where you can then select a different chapter. There is also a guide on the right-hand side of each page, this will show you what chapter of the document you are currently in and where that sits within the rest of the document. Throughout the document there are hyperlinks in the text that provide links to further information.

What is a Supplementary Planning Document?

Supplementary Planning Documents expand upon policy and provide further detail to support the implementation of policies in Local Plans. Whilst not a part of the development plan, they are a material consideration in the determination of planning applications. The Local Plan policies, which this SPD provides guidance on, can be viewed on the Council's website: www.eastsuffolk.gov.uk/localplan



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1 Introduction

Context

- 1.1 East Suffolk is a large district spanning over 200 square miles. Whilst it contains the two large towns of Felixstowe and Lowestoft, it is a predominately rural district characterised by small market towns and large areas of open countryside sparsely populated with villages, hamlets and farmsteads.
- 1.2 East Suffolk's countryside is home to beautiful landscapes, almost 50 miles of coastline and estuaries, and a number of historic parklands. The district benefits from a Heritage Coast with some of the country's best beaches and the Suffolk and Essex Coast & Heath National Landscape¹ which covers areas of heathland, woodlands, estuaries and coast to the south and east of the district. There are numerous sites with important wildlife, and flora and fauna that should be protected for future generations. An area in the northern part of the district falls within the Broads Authority area and whilst the Broads is its own planning authority, the protection of its landscape is important when considering development elsewhere in East Suffolk.
- 1.3 The countryside also contains a range of historic and listed properties including farmhouses, picturesque cottages, old barns, churches and grand houses that contribute to the local areas distinctiveness and character. Villages and settlements usually have historic patterns of built form that have experienced little growth in recent years.

¹ Formerly known as Suffolk Coast & Heath Area of Outstanding Natural Beauty (AONB)

Purpose of the Rural Development Supplementary Planning Document

- 1.4 The information and guidance contained in this Supplementary Planning Document (SPD) will assist in the implementation of planning policies in the Local Plans for East Suffolk regarding development in rural areas. This SPD covers a broad range of rural issues and topics including guidance on barn conversions, rural worker dwellings, farm diversification, rural annexes, economic development, equestrian development and more.
- 1.5 The SPD also provides guidance on Schedule 2, Part 3, Class Q of The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) which permits the conversion of agricultural buildings to dwellings.
- 1.6 The guidance in the SPD may also be relevant to the implementation of Neighbourhood Plan policies that relate to development in rural areas.
- 1.7 The SPD will not cover topics already covered in other SPDs. For example, the [Housing in Clusters and Small Scale Residential Development in the Countryside](#) SPD (November 2022) already provides guidance on policies SCLP5.4 and WLP8.7.
- 1.8 An SPD cannot create new or amend existing planning policies nor can it prescribe that particular areas of land be developed for particular uses; this is the role of the Local Plans and Neighbourhood Plans. As an SPD this guidance is a material consideration in determining applications for planning permission and listed building consent. This SPD does not cover parts of East Suffolk that are within the Broads, for which the Broads Authority is the local planning authority.



- 1.9 This document provides guidance on a number of permitted development rights related to agricultural uses. Permitted development rights allow some forms of development without the need to apply for planning permission. East Suffolk Council intends to provide further information on the range of different permitted development rights relating to agricultural land uses.

Preparation of the SPD

- 1.10 An initial consultation on the proposed scope and content of the SPD was held from 1st February to 15th March 2023. A questionnaire sought views on the scope and content of the SPD, through 5 questions. In total 26 individuals and organisations responded to the consultation. The comments received informed the drafting of this SPD.
- 1.11 A consultation on the draft SPD was held from 15th November 2023 until 10th January 2024. In total 15 individuals and organisations responded to the consultation. Between them they made 40 comments.
- 1.12 The Council's approach to engagement in the preparation of a Supplementary Planning Document is set out in the Statement of Community Involvement. Details of consultation comments and the Council's responses can be found in the Consultation Statement.

Local Plan Policy

- 1.13 The East Suffolk, [Suffolk Coastal Local Plan](#)² and East Suffolk, [Waveney Local Plan](#)³ (excluding the Broads Authority area) together with 'made'

² <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Suffolk-Coastal-Local-Plan/Adopted-Suffolk-Coastal-Local-Plan/East-Suffolk-Council-Suffolk-Coastal-Local-Plan.pdf>

³ www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Adopted-Waveney-Local-Plan-including-Erratum.pdf

Neighbourhood Plans and the Minerals and Waste Local Plans produced by Suffolk County Council, form the development plan for the district.

- 1.14 East Suffolk's rural areas benefit from a rich historic environment which includes picturesque listed cottages, characterful farmhouses, historic barns and ancient churches. These heritage assets compliment the countryside and contribute to the local character and distinctiveness of the area. The Local Plans set out policies that emphasise the importance of preserving and enhancing the historic environment. The [Historic Environment SPD](#)⁴ (July 2021) provides detailed information and guidance on implementing Local and Neighbourhood Plan policies in East Suffolk.
- 1.15 Some villages have been allocated sites for residential development within the Local Plans and Neighbourhood Plans. Other residential development may come forward in clusters and small scale developments through policies that support limited development in the countryside. The [Housing in Clusters and Small Scale Residential Development in the Countryside SPD](#)⁵ provides detailed information and guidance on implementing planning policies in the development plan.
- 1.16 The Rural Development SPD covers specific types of development found in rural areas including barn conversions, rural worker dwellings, rural employment, tourism and rural character. The SPD provides guidance primarily relating to rural matters in relation to the policies contained in the Council's adopted Local Plans.
- 1.17 The Local Plans set out a spatial vision and strategies for the period to 2036. The key Local Plan policies to which this SPD relates are listed below.

⁴ <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Historic-Environment-SPD/Historic-Environment-SPD-reduced.pdf>

⁵ <https://storymaps.arcgis.com/stories/64c3d4c794ee4577baef2726b9fc51aa>



1.18 Neighbourhood Plans may also set local policies that relate to their local areas. Neighbourhood Plans can address a wide range of topics including housing, employment, tourism, design and biodiversity that are informed by local circumstances and evidence.

1.19 Rural areas may not see large quantities of development, but they can see a wide range of development proposals. Therefore, a wide range of Local Plan policies are relevant to rural development.

National Planning Policy and Guidance

1.20 The [National Planning Policy Framework](#)⁶ (NPPF) (December 2023) sets out the government's planning policies and how they are to be applied. The importance of sustainable development, supporting rural communities and protecting the countryside is addressed throughout the NPPF.

1.21 In Chapter 5 'Delivering a sufficient supply of homes' the NPPF states that "in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs" (para.82). Housing in rural areas should be located "where it will enhance or maintain the vitality of rural communities" and it "should identify opportunities for villages to grow and thrive, especially where this will support local services" (para.83).

1.22 Paragraph 84 of the NPPF sets out that planning policies and decisions should avoid the development of isolated homes in the countryside unless specific circumstances apply such as the re-use of redundant buildings or where the design is of exceptional quality.

1.23 The NPPF addresses building a strong, competitive economy and how to support rural economies. Paragraph 88 of the NPPF supports sustainable growth and expansion of businesses, diversification of agricultural businesses, tourism, leisure, and retention of local services and community facilities.

1.24 The NPPF emphasises that meeting local business and community needs in rural areas may not be possible in locations in or adjacent to settlements and sites which may not benefit from good public transport. The NPPF supports development in rural areas that doesn't have an unacceptable impact on local roads, makes the best use of available sustainable transport and that is physically well-related to existing settlements (para. 89).⁶ The NPPF encourages "multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside" (para. 124).⁶

1.25 Paragraph 180 of the NPPF emphasises the importance of conserving and enhancing the natural environment by "protecting and enhancing valued landscape" and "recognising the intrinsic character and beauty of the countryside".⁶ It also notes developments should provide net gains for biodiversity.

The guidance in this SPD has been written with regard to the Government's most recent revision of the NPPF (December 2023) and the relevant categories of the Planning Practice Guidance to which the Council has regard as a material consideration in reaching decisions on planning applications. Of particular significance are NPPF Paragraphs 82, 83, 84, 88, 89, 124 and 180 and the Planning Practice Guidance on 'Rural Housing'.⁷

⁶ www.gov.uk/government/publications/national-planning-policy-framework--2

⁷ www.gov.uk/guidance/rural-housing



Local Planning Policy

East Suffolk, Suffolk Coastal Local Plan

- Policy SCLP4.5: Economic Development in Rural Areas
- Policy SCLP4.6: Conversion and Replacement of Rural Buildings for Employment Use
- Policy SCLP4.7: Farm Diversification
- Policy SCLP5.5: Conversions of Buildings in the Countryside for Housing
- Policy SCLP5.6: Rural Workers Dwellings
- Policy SCLP5.13 Residential Annexes
- Policy SCLP5.14: Extensions to Residential Curtilages
- Policy SCLP6.1: Tourism
- Policy SCLP6.2: Tourism Destinations
- Policy SCLP6.3: Tourism within the AONB and Heritage Coast
- Policy SCLP6.4: Tourism outside of the AONB
- Policy SCLP6.5: New Tourist Accommodation
- Policy SCLP7.1: Sustainable Transport
- Policy SCLP9.1: Low Carbon & Renewable Energy
- Policy SCLP9.2: Sustainable Construction
- Policy SCLP10.1: Biodiversity and Geodiversity
- Policy SCLP10.3: Environmental Quality
- Policy SCLP10.4: Landscape Character
- Policy SCLP11.1: Design Quality
- Policy SCLP11.2: Residential Amenity
- Policy SCLP11.3: Historic Environment

Local Planning Policy

East Suffolk, Waveney Local Plan

- Policy WLP8.8: Rural Workers Dwellings in the Countryside
- Policy WLP8.10: Residential Annexes in the Countryside
- Policy WLP8.11: Conversion of Rural Buildings to Residential Use
- Policy WLP8.14: Conversion and Replacement of Rural Buildings for Employment Use
- Policy WLP8.15: New Self Catering Tourist Accommodation
- Policy WLP8.21: Sustainable Transport
- Policy WLP8.27: Renewable and Low Carbon Energy
- Policy WLP8.28: Sustainable Construction
- Policy WLP8.29: Design
- Policy WLP8.31: Lifetime Design
- Policy WLP8.34: Biodiversity and Geodiversity
- Policy WLP8.35: Landscape Character
- Policy WLP8.37: Historic Environment



2 Rural Worker Dwellings

2.1 There are a number of rural activities that require a worker to be accommodated either on-site or nearby. In particular there are agricultural, horticultural and forestry practices which may require a worker to attend at short notice and to be available during the night and day. In addition, accommodation within the area may be unaffordable or in short supply to house the worker. This may then result in the need for a rural worker dwelling. However, it is important that this does not result in a proliferation of housing in the countryside often in unsustainable locations. Accordingly, there must be a strong, evidenced need that the dwelling is essential to the functioning of the rural business that the rural worker dwelling will be associated with.

Policy

2.2 These are the key policies relating to Rural Worker Dwellings:

Suffolk Coastal Local Plan policies:

- Policy [SCLP5.6: Rural Workers Dwellings](#)

Waveney Local Plan policies:

- Policy [WLP8.8: Rural Workers Dwellings in the Countryside](#)

National Planning Policy Framework: Para 84(a)

2.3 The NPPF sets out that planning policies and decisions should avoid the development of isolated homes in the countryside. Paragraph 84 sets out the limited circumstances where an isolated dwelling in the countryside may be appropriate, including under 84a) where “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”⁸

Policy Guidance

2.4 Topics covered in this chapter:

- Functional Need
- Existing Dwellings
- Full-time worker
- An established business
- Is it sensitively designed?
- Occupancy condition
- Varying/Removing the condition

Functional Need

2.5 The applicant will need to demonstrate that there is a functional need for a worker(s) to live on site. The worker should be essential to the operation of the business and not merely convenient.

2.6 The applicant will be expected to demonstrate why a person is required on site and that should a rural worker dwelling not be provided then the business would not be able to function properly. The worker should be required to live on site through-out the year as well as day and night.

2.7 For example, the applicant could show a requirement of a worker to take essential care of livestock with the ability to respond to emergencies with the animals at all times. Agricultural practices requiring year-round and day/night rearing of young could be considered appropriate whereas practices which are

⁸ www.gov.uk/government/publications/national-planning-policy-framework--2



only required to rear young animals for part of the year (i.e. Spring due to birthing) would not usually form a year round functional need.

- 2.8 Temporary dwellings may represent a more appropriate form of housing for seasonal workers for whom a permanent rural worker dwelling would not be appropriate.
- 2.9 The Planning Practice Guidance on Housing Needs for Different Groups (Paragraph: 010 Reference ID: 67-010-20190722)⁹ states that ‘Employment on an assembly or food packing line, or the need to accommodate seasonal workers, will generally not be sufficient to justify building isolated rural dwellings.’

How is this demonstrated?

- 2.10 Within a Rural Worker Dwelling Statement the applicant would be expected to detail the functional need, the statement should show why a person on-site is required and why somebody living a short distance away would not be suitable/applicable. Particular reference needs to be made to the tasks that require a year-round, day-night worker to be physically onsite. It should be supported with details of how many expected staff-hours each task is expected to take and why these tasks are essential for the business to function. Consideration will be given to the nature of the tasks, and which require a permanent presence from the worker on site, as well as how alternative methods including the use of technology have been explored and if/why they are not deemed appropriate.
- 2.11 An on-site presence for security purposes is unlikely to represent a functional need where other security infrastructure such as enhanced CCTV, alarms, motion and temperature monitoring and fencing could viably provide a reasonable level of security.

⁹ <https://www.gov.uk/guidance/housing-needs-of-different-groups>

Existing Dwellings

- 2.12 There may be existing suitable dwellings either on-site or nearby which would negate the need for a new dwelling. Preference should always be given to existing suitable dwellings over creating new dwellings in what are largely unsustainable locations.

How is this demonstrated?

- 1) Details of any dwellings available on-site or nearby will be required, this can be submitted as part of a Rural Worker Dwelling Statement.
- 2) Are there any existing residential houses on site? Could the existing farmhouse be utilised? Where a building with residential use is available on-site but the applicant believes it to be unsuitable for the rural worker then they would need to justify why that dwelling is unsuitable. This could be in the form of a statement (part of the Rural Worker Dwelling Statement), but a plan of the site showing these other dwellings would also be useful. It is recognised that often an existing dwelling might be occupied by parents or grandparents of the applicant and the application relates to maintaining housing for the new generation of the family running the business. That fact alone does not justify not using the existing dwelling. Opportunities to address generational needs through proposals such as annexes should be considered and demonstrated.
- 3) Have any residential properties been sold from the land in recent years? If, for example, the business unit had converted a barn and sold it off as market housing in recent years this would suggest the rural worker dwelling is not essential to the operation of the business as otherwise



the unit would have been used for the purpose of a rural worker dwelling. A statement regarding whether or not any residential units have been sold (or used for a non-residential purpose) from the site should be provided covering a period of at least the past 5 years. If a suitable residential unit had been sold/discarded for another use, then justification will be needed as to why a new dwelling is required now.

- 4) Are there any units available for sale or rent nearby? If there is a property nearby this may meet the needs of the potential rural worker. The search distance for suitable properties will vary depending on how quickly the rural worker will need to be on-site and justification for the search distance should be included in the Rural Worker Dwelling Statement.
 - 5) The search period should be robust and cover an appropriately considered geographical area unless there are extenuating circumstances that have been adequately justified. A regular documented assessment of the local housing market for rent and sale over a period of at least 1 year prior to the submission of the application would likely be appropriate.
- 2.13 The search evidence of nearby marketed dwellings will provide an understanding of the local housing market and can be used to support the application. It can help show the pricing and health of the local housing market and why the recently marketed houses may or may not be suitable for the rural worker dwelling.
- 2.14 It is important to note that evidence showing a lack of suitable housing nearby does not, on its own, justify a rural worker dwelling. The other requirements of the policy must still be met.

Full Time Worker

- 2.15 The applicant will need to demonstrate that the worker is a full-time employee in a rural sector and that a full-time role is required. If the worker would only be required on a part time basis this would not be justification for a rural worker dwelling. It should be demonstrated that the tasks within the job role are a fundamental part of the job and are not small, irregular tasks. The full time salary of that worker, whether business owner or employee also needs to a part of the financial case.

How is this demonstrated?

- 2.16 The Rural Worker Dwelling Statement should provide details of how many expected staff-hours each task is expected to take justifying that a full-time worker is required. Consideration will be given to the nature of the tasks and which require a permanent presence from the worker on site. Tasks that require a small number of checks over a 24 hour period that could be undertaken remotely through the use of technology are unlikely require a full-time worker on their own.
- 2.17 Consideration should also be given the business’s staffing levels and whether other employees can meet the need rather than creating a rural worker dwelling.

An Established Business

- 2.18 To allow a rural worker dwelling the Local Authority must be satisfied that the business is a viable enterprise ensuring a future connection between the dwelling and the business. The applicant will need to show it is an established business operating for at least 3 years. The prospect of the business remaining viable for the future also needs to be demonstrated.

How is this demonstrated?



2.19 A Business Assessment/Appraisal will be required which can be submitted as part of a Rural Worker Dwelling Statement. This will include:

- 1) A business plan – this will demonstrate how the business will operate and grow in the coming years to show that the business will be viable in the long term. The business plan would be expected to provide budgets and income projections as well as any plans for future growth in terms of staff, building capacity or new lines of business.
- 2) Account details – this will demonstrate that the business is currently viable. The applicant should provide at least 3 years’ worth of accounts, but longer accounts will provide a better overall picture. The submission of actual accounts is required, as opposed to a summary. They should comprise of the trading and profit and loss; the balance sheet figures, with all the normal costs of the enterprise, including the business owner’s salary/income, labour and purchase costs. Furthermore, information on the following will be beneficial: costs of stock, feed, vet care, transport, marketing, electricity, insurance, accountants, water charges, repairs, land rent and financing charges. It should also account for the cost of the rural workers dwelling development, such as the build cost/mortgage as part of the long term business plan. Without this breadth of information, the officer assessing the planning application may not be able to determine that the business is both established and viable for the future.
- 3) The submission should show that the tasks that create the need for the full-time worker and rural worker dwelling have been established for 3 years and are not relatively new. For example, whilst the overall business may be established, where the need for a rural worker dwelling

is due to a specific activity which has only been undertaken for 1 year this part of the business would not be considered to be established, undermining the need for the rural worker dwelling.

2.20 The Local Planning Authority will consider what information needs to be redacted for public viewing. Any information that becomes a material consideration in determining the application will likely be published.

Is it sensitively designed?

- 2.21 Any new dwelling in a rural location should be designed, landscaped and located to fit in with its surroundings and of a scale that reflects its functional role to support the agricultural activity. If there are existing non-residential units within the rural business that already provide a positive benefit to the character of the rural landscape and history of the local area, then these should be considered for conversion first before considering new builds. If discounted on cost of conversion grounds, a comparison of the conversion and new build costs should be supplied. The scale should meet the needs of the rural worker and should not be of a greater and more significant scale than this. Ultimately the dwelling should be modest and compatible with its surroundings.
- 2.22 For guidance the National Space Standards¹⁰ suggests that a two-storey house for 4-6 people would require an internal space of between 84-106 square metres. This would be reasonable in most circumstances to house the worker and their immediate family. A dwelling smaller than this specifically for 1-2 people would also be reasonable, but dwellings significantly larger than this should be justified as to why it is required at that scale.
- 2.23 The house may require additional space above that of a normal dwelling to house facilities required for the rural worker (for example a boot room or office). These

¹⁰ <https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard/technical-housing-standards-nationally-described-space-standard>



rooms should be labelled on the floor plan.



Rural workers dwelling

2.24 A statement on the scale of the dwelling should be submitted, particularly for larger dwellings, this can be submitted as part of a Rural Worker Dwelling Statement. It should be recognised that in the event that the rural business ceases in the longer-term future, a rural workers dwelling would remain with associated restrictive occupancy condition. Whilst the condition would influence a lower market value for the property, the modest nature of the dwelling would also ensure that it is more available to wider rural workers needs and budgets in the longer-term future. A spacious five bedroom home is unlikely to be within

reach of the budget a typical rural worker, especially those on lower agricultural incomes, who might meet the occupancy condition.

- 2.25 Policy SCLP11.1 and WLP8.29 set out the criteria for design applicable to almost all developments. Rural developments will often have their own distinct and often variable character so development should seek to be contextually driven by its surroundings whether it is a new build or conversion. Some rural buildings/holdings will have specific historic value where development will need to be particularly sensitive.
- 2.26 For example, a new worker dwelling within an agricultural business should seek to avoid isolated dwellings where distinct groupings of buildings are present. The materials should draw inspiration from its surroundings allowing the new property to complement and feel part of the wider grouping. Guidance on the development of buildings with historic value can be found in the [Historic Environment SPD](#) (2021).¹¹ and the chapter Rural Building and Barn Conversion. Furthermore, the [Suffolk Historic Environment Record](#).¹² provides a useful resource for finding historic assets.
- 2.27 Consideration must be given to non-designated heritage assets which are locally-identified 'buildings, monuments, sites, places, areas or landscapes identified by plan making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria' (Planning Practice Guidance on Historic Environment Paragraph: 039 Reference ID: 18a-039-20190723) for designated heritage assets'
- 2.28 The property will require the same amenities as a normal dwelling so should have access to appropriate private outdoor space. The layout of the outdoor space should relate well to the layout of the existing farm holdings. Furthermore, the

¹¹ www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Historic-Environment-SPD/Historic-Environment-SPD-reduced.pdf

¹² <https://www.suffolk.gov.uk/culture-heritage-and-leisure/suffolk-archaeological-service/the-historic-environment-record>



boundary treatment should be carefully considered, close boarded fences will not be appropriate in certain locations.

- 2.29 The property will have the same parking requirements as a normal market dwelling of its size. The parking should be designed to be respectful to the character of the area with appropriate surfacing. A separate access may be inappropriate so consideration should be given to the provision of a single, shared access to the rural worker dwelling and the existing farmstead with its own driveway for parking.
- 2.30 The landscape character assessments undertaken as an evidence base for both local plans¹³ can help guide the design and landscaping to ensure it is as sympathetic as possible.
- 2.31 For further advice on Farmsteads please see the chapter Rural Building and Barn Conversions.
- 2.32 Please note that permitted development rights that allow for extensions and other alterations may be removed to ensure that the dwelling remains of a scale suitable for a rural worker dwelling.

Occupancy condition

- 2.33 The occupancy of the rural worker dwelling will be restricted by condition(s) to ensure that it is occupied by a person, or persons, currently or last employed in local rural employment. Should the occupying Rural Worker pass away or need to move into care, an occupier condition should include an allowance for the surviving members of the family to remain on site even if they themselves are not employed by the rural business. An example condition is included below for use where the occupation of the property is fundamentally linked to a need for

the occupier to work on site (e.g. for the care of livestock or security) and where that need has been a necessary planning consideration. Please note the condition uses an agricultural use as an example.

The occupation of the dwelling hereby approved shall be limited to the owner or employee (and their spouse and any resident dependents) of the business occupying the plot (add reference to plot and plan) and solely or mainly employed by that business serving agricultural needs (as defined by the Town and County Planning Act 1990) or a widow or widower of such a person. The property shall not be let independently or sold off from the business unit.

- 2.34 In other cases, there are instances where the dwelling may be occupied more generally by rural workers, though this depends on the functional need considerations in the application. In such circumstance the condition can apply to wider occupancy:

The occupation of the dwelling hereby approved shall be limited to any person or persons solely or mainly employed in agriculture or forestry (as defined by the Town and County Planning Act 1990) in the locality and their spouse and any resident dependents or a widow or widower of such a person.

Varying/Removing the condition

- 2.35 Rural Worker Dwellings are permitted for a specific reason and may not have achieved planning permission as a normal market dwelling. Where planning permission is granted for a rural workers dwelling, occupancy restriction conditions will be imposed to ensure the dwelling is used for that purpose and remains available for that purpose in the future. This avoids new isolated market housing in the countryside, which is contrary to the policies contained within the

¹³ <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/local-plan-evidence-base/>



National Planning Policy Framework and the Local Plans. Proposals to remove occupancy restriction conditions will rarely be approved without good justification and evidence that the rural workers dwelling is no longer needed.

- 2.36 Changes to the use of the business or its business model may mean that an employee is no longer needed to be on-site night and day. Whilst the rural worker dwelling may no longer be needed for the business/holding it is situated on, the dwelling may still be of use as a rural worker dwelling to other businesses/holdings within the near vicinity. Accordingly, the site will need to be appropriately marketed and advertised to ascertain whether the need for the rural worker dwelling exists nearby. If there are suitable rural workers in the near vicinity and the condition is restricted to owners or employees of the site then the condition will require varying. If the site specific element of the condition has become redundant then the variation of the condition for wider occupation is likely to be approved. The need to vary a site specific condition in any marketing should not be seen as an impediment to such potential sale or rental.

How is this demonstrated?

- 2.37 A Statement and Marketing Report will be required:

- A statement detailing why the Rural Worker Dwelling is no-longer required on site and evidence of other similar holdings/businesses who were contacted asking their interest in taking on the rural worker dwelling or whether their employees are in need of it for rent or purchase. The method of contact with the other holdings/businesses needs to be in writing and clear in its intent.

- Marketing Report. The format of the marketing report is detailed in Appendix E of the Suffolk Coastal Local Plan¹⁴ and Appendix 4 of the Waveney Council Local Plan¹⁵ and is not repeated here. Such a dwelling should be made available for rent and purchase and suitable rural publications, message boards and forums should be used to advertise the property.
- Evidence that a minimum of three Registered Providers operating locally on terms that would prioritise its occupation by a rural worker as an affordable dwelling were approached and that option has been refused. The method of contact with the Registered Providers needs to be in writing and clear in its intent. The response from the registered provider declining the offer should also be provided.

¹⁴ <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Suffolk-Coastal-Local-Plan/Adopted-Suffolk-Coastal-Local-Plan/East-Suffolk-Council-Suffolk-Coastal-Local-Plan.pdf> (page 516)

¹⁵ <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Adopted-Waveney-Local-Plan-including-Erratum.pdf> (page 321)



3 Rural Annexes

- 3.1 A residential annexe is a form of accommodation that allows a family member or domestic employee to live with their relatives or employer whilst retaining an element of independence. For example:
- A family member that requires care and needs support but does not want to enter a residential institution may wish to move in with family but retain a degree of independence.
 - Or where an occupier of a property requires care or domestic support through a live-in employee.
- 3.2 Annexe accommodation is not purely a rural matter but as many instances of detached or larger annexes are proposed in rural areas, it is a focus of this SPD. Annexes may be in the form of an extension, conversion of an existing building, or the construction of a new building. In Planning terms a residential annexe is accommodation that is ‘ancillary’ to the original, main dwelling. ‘Ancillary’ means the annexe is subordinate to the dwelling and does not provide all the accommodation and facilities necessary to function as a separate dwelling.
- 3.3 In most suburban and urban locations, the size of the property and plot restrict how a relative or employee moving into the property is accommodated. New space is often created through the internal organisation of spaces, the conversion of an attic or an extension, though detached annexes are increasingly common. In rural locations larger plot sizes offer the opportunity for sizeable extensions, the construction of a detached buildings or the conversion of an ancillary/outbuilding. In rural locations extra care must be taken that the proposed development is ancillary and well related as an annexe and not the creation of new dwelling

and that such additions remain well related to the main house. Often new annexe proposals are made with justified intentions for suitably related individuals, however, over time and as properties change ownership, the genuine annexe need may reduce or end giving rise to the risk of independent occupation.

- 3.4 This chapter is intended to assist homeowners when designing a scheme and submitting an application.

Policy

- 3.5 These are the key policies relating to residential annexes:

Suffolk Coastal Local Plan policies:

- [Policy SCLP5.13: Residential Annexes](#)

Waveney Local Plan policies:

- [Policy WLP8.10: Residential Annexes in the Countryside](#)

- 3.6 The two planning policies contain differences. The Suffolk Coastal Local Plan policy SCLP5.13 relates to all residential annexes whereas the Waveney Local Plan policy WLP8.10 relates specifically to residential annexes in the Countryside. Both local plans have Settlement Boundaries drawn on policy maps which define the built-up areas of many settlements. Land outside Settlement Boundaries and land outside that allocated for development in the Local Plans is considered to be Countryside. There is a presumption against development in the Countryside except where policies in the Local Plans indicate otherwise. Not all villages and settlements have Settlement Boundaries, where they have fewer services and facilities to support new development, and are therefore considered to be in the Countryside.
- 3.7 Policy SCLP5.13 sets out seven criteria which a proposed annexe must meet to be supported. Policy WLP8.10 sets out a hierarchy of approaches to



annexe development. Under WLP8.10 extensions would be supported, followed by the conversion of detached outbuildings where an extension is not feasible, then the erection of new build detached residential ancillary accommodation.

Policy Guidance

3.8 Topics covered in this chapter:

- Key characteristics of an annexe
- Overall Strategy for designing an annexe when planning permission is required.
- Information on when permitted development rights apply to:
 - Extension for an annexe,
 - Erection of a new building as an annexe,
 - Conversion of an existing building as an annexe, and
 - Caravan Act compliant structure.
- Information on applying for Planning Permission for an:
 - Extension for an annexe,
 - Erection of a new building as an annexe, and
 - Conversion of a building as an annexe.

Key characteristics of an annexe

3.9 To be considered an annexe development should conform to the following characteristics:

- 1) It is subordinate in size, scale and design to the original, main dwelling.
- 2) It is 'ancillary' to the original house and has a 'functional' connection to the original, main dwelling, such as the occupant being a dependant relative or employed at the main dwelling.

- 3) Is within the same ownership and is occupied in conjunction with the original, main dwelling and shares the same postal address.
- 4) It is dependent on the original, main dwelling for some living functions, such as living spaces, full kitchen, laundry facilities, access and/or external amenity space.
- 5) Shares the vehicle and pedestrian access and parking facilities with the original, main dwelling.
- 6) Shares the garden with no boundary, demarcation or sub-division with the original, main dwelling. There should be direct path access door to door between the main dwelling and annexe, if detached.
- 7) It is located within the residential curtilage and closely related in terms of position and proximity to the original, main dwelling to prevent subdivision of the existing plot.
- 8) The annexe should share services and mains utility connections with the original main dwelling (e.g. water, electricity, sewerage etc).

3.10 Where an annexe does not meet the above characteristics, there is a risk that it will form an independent, new dwelling. Applications for new dwellings are subject to relevant policies in the Local Plans. There is a general presumption against new development, including new dwellings in the countryside, outside of Settlement Boundaries.

Overall approach to designing an annexe

3.11 The following points provide key considerations when approaching the design of an annexe:



- 1) Consider the relationship between the original, main dwelling and the proposed annexe.
- 2) Be closely related to enable care to be provided to or by the occupant of the annexe.
- 3) Prevent the negative impacts of a new development on the character of the host dwelling and surrounding landscape, such as avoiding extending the built form into open countryside or locating the building so it doesn't relate to the built form of the village or farmstead.
- 4) Prevent unacceptable impacts of the proposed development on any neighbouring property's residential amenity.
- 5) Ensure the original, main dwelling and the proposed annexe maintain acceptable levels of residential amenity, such as daylight, views and enjoyment of the garden.
- 6) Proposals should consider the hierarchy of preferred development approaches detailed in policies WLP8.10 and SCLP5.13. First consider an extension to the dwelling to accommodate the annexe. If an extension is not feasible, identify whether there are any buildings on site suitable for conversion. The conversion of an existing building may be more in keeping with the character of the original house and the local area than the construction of a new building. Only where an extension or conversion of an existing building are not feasible should a detached new building be proposed.
- 7) Create a building that is designed and constructed to be sustainable, and where possible considers measures detailed in the Sustainable

Construction SPD. Paragraph 131 of the National Planning Policy Framework¹⁶ states that 'The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve'.

- 8) Design the annexe so that it can be converted to another ancillary use should the annexe use come to an end. In the case of an annexe as an extension, opportunities to subsume it into the wider residential layout of the home or in the case of a detached building, using it as a home office, games or hobby room or conversion to a garage space.
- 9) Consider the impact of the proposed development on biodiversity.

When is planning permission required?

- 3.12 Permitted development allows homeowners to carry out limited alterations, extensions and conversion of buildings on site, without the need for planning permission.
- 3.13 Not all properties benefit from full permitted development rights. Applicants are advised to check their property has permitted development rights to extend the dwelling, and/or alter, extend or convert outbuildings. Properties without permitted development rights must apply for planning permission to alter or extend. Dwellings that are Listed Buildings will require Listed Building Consent for alterations and extensions, and also require planning permission to alter, extend or convert outbuildings (even if those outbuildings are not curtilage listed in their own right).
- 3.14 Advice on permitted development rights is available from the East Suffolk Planning Service at:

¹⁶ www.gov.uk/government/publications/national-planning-policy-framework--2



www.eastsuffolk.gov.uk/planning/planning-applications-and-enforcement/find-out-if-you-need-planning-permission/pre-application-advice-service/

Extension for an annexe under Permitted Development Rights

- 3.15 Where possible applicants are advised to extend an existing dwelling to provide annexed accommodation rather than construct a separate building on the plot. Consideration should be given to what the space will be used for once an annexe is no longer required. Extensions can have multiple uses and offer great flexibility.
- 3.16 Extensions as annexes, if well integrated as part of the main dwelling layout can be permitted development. The Government has published guidance on what works constitute permitted development. The Governments guidance is available here:

[Permitted development right for householders: technical guidance \(2019\)](#).¹⁷

Erection of a new building for use as an annexe under Permitted Development Rights

- 3.17 Schedule 2, Part 1, Class E of the General Permitted Development Order (GPDO) outlines when outbuildings for residential properties are permitted under this order. It states that the outbuilding can only contain uses that are 'required for a purpose incidental to the enjoyment of the dwellinghouse'.
- 3.18 The [Permitted development rights for householders: technical guidance \(2019\)](#) sets out the rules on Class E permitted development buildings within

the curtilage of a house. The Technical Guidance states:

“Buildings under Class E should be built for purposes incidental to the enjoyment of the house. Paragraph E.4 of Class E indicates that purposes incidental to the enjoyment of the house includes the keeping of poultry, bees, pet animals, birds or other livestock for the domestic needs or personal enjoyment of the occupants of the house.

But the rules also allow, subject to the conditions and limitations below, a large range of other buildings on land surrounding a house. Examples could include common buildings such as garden sheds, other storage buildings, garages, and garden decking as long as they can be properly be described as having a purpose incidental to the enjoyment of the house. A purpose incidental to a house would not, however, cover normal residential uses, such as separate self-contained accommodation or the use of an outbuilding for primary living accommodation such as a bedroom, bathroom, or kitchen.”

- 3.19 The erection of new buildings for use as an annexe is not permitted under Class E Permitted Development Rights. A planning application is required for new buildings to be used as an annexe.

Conversion of an existing building for an annexe under Permitted Development Rights

- 3.20 Rural properties may have garages, cart lodges, summer houses, and other buildings within the residential curtilage of the house. These buildings may be used for a range of purposes such as offices, summer rooms, gyms, storage and many other uses. The use of these buildings is considered

¹⁷

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/830643/190910_Tech_Guide_for_publishing.pdf



incidental to house. These buildings may be suitable in size, location and structural condition to be converted into an annexe.

- 3.21 The Town and Country Planning (General Permitted Development) (England) Order 2015, Schedule 2 Permitted Development, Part 1 Class E relates to new or altered outbuildings within the curtilage of a dwellinghouse. Specifically it can permit the maintenance, improvement or other alteration of an existing building required for a purpose incidental to the enjoyment of the dwellinghouse.
- 3.22 An existing and established outbuilding within the curtilage of a residential dwelling may be capable of conversion to an annexe without the need for planning permission if no change of use has occurred pursuant to section 55 (2)(d) of the Town and County Planning Act 1990 which states:
- 'the use of any buildings or other land within the curtilage of a dwellinghouse for any purpose incidental to the enjoyment of the dwellinghouse as such',*
- 3.23 This is providing a separate planning unit is not created and it would remain within the primary use of the dwellinghouse.
- 3.24 In order to establish as a matter of fact and degree if planning permission is required it has to be established whether a separate planning unit has been created.
- 3.25 In establishing whether a separate planning unit has been created it needs to be considered who the occupant is and if they fall under the criteria of Class C3(a) of the Order which states:-

- 3.26 Use class C3(a) (dwellinghouse) should be wholly occupied by:

'a single person or family (a couple, whether married or not, a person related to one another with members of the family of one of the couple to be treated as members of the family of the other), an employer and certain domestic employees (such as an au pair, nanny, nurse, governess, servant, chauffeur, gardener, secretary and personal assistant), a carer and the person receiving the care and a foster parent and foster child.'

- 3.27 To remain a single main dwelling (and not a separate planning unit) it should be a single family unit with the exceptions listed above.
- 3.28 Planning permission may be required for some physical works to achieve a comfortable annexe conversion. This depends on the nature on the building including its size and condition.

Caravan Act Compliant Structures

- 3.29 Some annexes may be provided through compliance with the [Caravan Sites Act 1968 \(as amended\)](#)¹⁸. The Caravan Act permits caravans, mobile homes and many prefabricated annexes, garden rooms and cabins erected within the curtilage of a dwellinghouse. The Caravan Act covers structures that can be transported by road and that are not fixed to the ground. The Caravan Act also includes restrictions on the size and height of structures. Structures must not exceed 20m in external length, 6.8m external width and 3.05m internal height.

¹⁸ www.legislation.gov.uk/ukpga/1968/52



Applying for Planning Permission for an extension for an annexe

- 3.30 Planning Applications for an extension to a home to accommodate an annexe should meet the requirements set in design and residential amenity policies ([SCLP11.1](#), [SCLP11.2](#) and [WLP8.29](#)). Proposals should consider whether there would be any impacts on the historic environment (policies [SCLP11.3 – SCLP11.5](#) and [WLP8.37 – WLP8.39](#)). In rural locations it is particularly important to consider the impact of development on biodiversity and the character of the landscape (policies [SCLP10.1](#), [SCLP10.4](#), [WLP8.34](#) and [WLP8.35](#)).
- 3.31 Proposals for an annexe should consider the ‘key characteristics of an annexe’ and the ‘overall strategy for designing an annexe’ listed above. An annexe extension should give particular consideration to the following issues:
- Ensure the design and layout is practical and functional. It is recommended that both the current and future needs of the occupant are considered. If someone’s mobility is likely to decline level access and sufficient space to accommodate a wheelchair may be advisable.
 - The overall size, scale, height, and mass of the extension should be subordinate to the main dwelling.
 - The character of the extension should respond to the existing dwelling, features, such as trees, and the surrounding area.
 - The proposal should protect the amenity of the existing dwelling and neighbouring dwellings.

- 3.32 East Suffolk Council offers a Pre-Application Advice Service. Pre-application advice is a good way of getting feedback on your proposals and increases the chances of a successful planning application. Information on submitting a proposal for pre-application advice is available here:

<https://www.eastsuffolk.gov.uk/planning/planning-applications-and-enforcement/find-out-if-you-need-planning-permission/pre-application-advice-service/>

- 3.33 Detailed information on how to submit a householder planning application is available online here:

<http://www.eastsuffolk.gov.uk/planning/planning-applications-and-enforcement/how-to-submit-a-planning-application/>

Applying for Planning Permission for a detached building for use as an annexe

- 3.34 Planning Applications for a new building should meet the requirements set out in annexes policies ([SCLP5.13](#) and [WLP8.10](#)), design and residential amenity policies ([SCLP11.1](#), [SCLP11.2](#) and [WLP8.29](#)), historic environment policies ([SCLP11.3 – SCLP11.5](#) and [WLP8.37 – WLP8.39](#)), and biodiversity and landscape character policies ([SCLP10.1](#), [SCLP10.4](#), [WLP8.34](#) and [WLP8.35](#)).
- 3.35 An annexe should be subordinate in size, scale and design to the original, main dwelling. This can be achieved in various ways such as through the height of the roof, number of storeys and size of the footprint of the building. A small, single storey unit that is not sufficient in size to accommodate an entirely new dwelling would be appropriate as an annexe.



- 3.36 Proposals should consider the impact of a new development on the character of the dwelling and surrounding landscape and the impact on any neighbouring properties.
- 3.37 An annexe should be located away from neighbouring homes and respect key landscape features such as mature trees. The annexe should be located close enough to the main, original dwelling to make future subdivision of the plot unfeasible.
- 3.38 Consideration should be given to creating an energy efficient, sustainably designed, and constructed building. Detailed guidance is provided in the Sustainable Construction Supplementary Planning Document¹⁹. Where possible the building's windows should be orientated to maximise daylight and solar gain, without overlooking neighbouring properties. Where necessary the design should provide adequate solar shading to prevent overheating in warm weather. Low carbon and renewable energy should be incorporated where possible.
- 3.39 Ideally the proposal should have the main access into the annexe facing an access into the original dwelling to create a close, dependant, functional relationship.
- 3.40 Consideration should be given to both the current and future needs of the occupant of the annexe. An annexe can be designed to be accessible and adaptable. Where possible, it is recommended that annexes are designed to meet the needs of wheelchair users in accordance with M4(3) of the [Building Regulations Approved Document Part M](#)²⁰.

¹⁹ [eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Sustainable-Construction-2022/FINAL-Sustainable-Construction-SPD.pdf](https://assets.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Sustainable-Construction-2022/FINAL-Sustainable-Construction-SPD.pdf)

²⁰ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/540330/BR_PDF_AD_M1_2015_with_2016_amendments_V3.pdf



4 Rural Residential Curtilage Expansion

- 4.1 In rural areas it is common for residential properties to border agricultural land. In some instances, owners of residential properties may wish to expand their gardens or ancillary land by purchasing adjacent agricultural land. Depending on the intended use of the agricultural land, planning permission may be required for a change of use. In the case of it being used for domestic garden, planning permission will always be required.
- 4.2 This chapter is intended to assist homeowners to understand which uses are regarded as residential and when planning permission is required for a change of use of land. This chapter addresses the relationship between residential curtilage and rural areas whilst identifying the important factors for consideration when proposing extensions to residential curtilage.
- 4.3 These are the key policies relating to this matter:

Suffolk Coastal Local Plan policies:

- [Policy SCLP3.2: Settlement Hierarchy](#)
- [Policy SCLP3.3: Settlement Boundaries](#)
- [Policy SCL5.14: Extensions to Residential Curtilages](#)
- [Policy SCLP10.1: Biodiversity and Geodiversity](#)
- [Policy SCLP10.3: Environmental Quality](#)
- [Policy SCLP10.4: Landscape Character](#)

Waveney Local Plan policies:

- [Policy WLP1.2: Settlement Boundaries](#)
- [Policy WLP8.34: Biodiversity and Geodiversity](#)
- [Policy WLP8.35: Landscape Character](#)

Policy Guidance

- 4.4 Topics covered in this chapter:
 - What is Agricultural Land?
 - What is residential curtilage?
 - Permitted Development Rights
 - What can residential curtilage be?
 - What can residential curtilage not be?
 - Issues to consider when expanding residential curtilage/changing the use of adjacent agricultural land.

What is Agricultural Land?

- 4.5 In simple terms, this mostly comprises of arable fields, meadows, pasture, heathland and woodland. Section 336 of the Town and Country Planning Act 1990 provides the definition of agriculture:

“includes horticulture, fruit growing, seed growing, dairy farming, the keeping and breeding of livestock (including any creature kept for the production of food, wool, skins, fur, or for the purpose of the farming of the land), the use of land as grazing land, meadowland, osier land, market gardens and nursery grounds, and the use of land for woodlands where that use is ancillary to the farming of land for other agricultural purposes, and ‘agricultural’ shall be construed accordingly”.

What is residential curtilage?

- 4.6 Residential curtilage or domestic curtilage is generally considered to be land immediately around and belonging to a dwellinghouse. Residential curtilage can contain front and rear garden space, courtyard, driveway, incidental



outbuildings and garages. A property's garden is usually the land used in conjunction with the dwellinghouse and for the enjoyment of the occupants but it may not be the same as the residential curtilage for the purpose of permitted development rights and this can be a more confined area around the property

- 4.7 In planning terms, the definition of 'residential curtilage' and the wider 'planning unit' or 'residential unit' can be unclear. The definition has been largely established through planning appeals and by case law.
- 4.8 The definition of residential curtilage and the exact physical location of a property's residential curtilage is a matter of planning judgement. One of the factors to be considered is the physical layout of the land around the dwellinghouse.
- 4.9 Residential curtilage is not defined by land ownership and may not be immediately obvious. There can be land within the same ownership that does not form part of the residential curtilage of a dwelling.

Influence of Settlement Boundaries

- 4.10 Residential curtilage is not defined by the settlement boundary. Settlement Boundaries are defined on the Policies Maps and delineate the built-up area of a settlement, beyond which is Countryside for planning purposes. The shape and form of settlements and their boundaries vary. Some villages and small settlements do not have Settlement Boundaries, where they have been defined as Countryside due to their limited level of services and facilities.

²¹ <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/Landscape-Character-Assessment.pdf>

- 4.11 The role existing residential curtilage plays within the local area must be considered before undertaking extensions to curtilage. Settlement Boundaries usually follow the boundaries of existing development, gardens, and uses, and therefore define the area of a settlement to distinguish it from the countryside. Often there will be a notable landscape difference associated with a Settlement Boundary. Extensions to residential curtilage will usually extend beyond the Settlement Boundary where one exists and therefore the role of the Settlement Boundary in influencing that landscape character should be considered. Where a Settlement Boundary has not been defined around a settlement or group of houses, there is likely to still be a notable difference between the character of the built area and the landscape beyond, which will need to be carefully considered.

Impact on the landscape and biodiversity

- 4.12 Extensions to residential curtilage and the introduction of domestic uses to land within a rural setting that was previously used for agriculture can have a significant visual impact on the surrounding landscape. Extensions to residential curtilage often result in a gradual shift away from open and natural landscapes to landscapes featuring urban characteristics such as sheds, garages and hard standings. The Landscape Character Assessments for the former [Waveney](#)²¹ and [Suffolk Coastal](#)²² areas should be considered alongside the Local Plan policies when approaching residential curtilages extensions in rural areas. In some instances landscape character assessment has also been undertaken as part of Neighbourhood Plan preparation and may also therefore be relevant.

²² <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/First-Draft-Local-Plan/SCDC-Landscape-Character-Assessment.pdf>

4.13 When extending a residential curtilage careful consideration should be given to the size, location and hedgerows. Policy SCLP5.14 states that residential curtilage expansion will be permitted where:

- “The resulting size of the curtilage reflects the scale and location of the dwelling.
- They do not result in the removal of an existing hedgerow or native species unless replaced by a similar hedgerow.”



Border planting adjacent to agricultural land

4.14 It is recognised that in some cases, an extension to residential curtilage within a rural area is required to meet the needs of the residents. This can be supported in scenarios where the extension is delivered in a form that does not negatively impact the local landscape and appearance. However, robust evidence is required to demonstrate a curtilage extension can be delivered without damaging the local landscape.

4.15 Furthermore, extensions to residential curtilage can affect biodiversity and therefore, careful consideration must be made to avoid such impacts. In some instances, specifically extensions into agricultural land, there is likely to be minimal impact on biodiversity and potentially some biodiversity gain. Extensions to residential curtilage are encouraged to demonstrate that there will be no adverse impact on biodiversity.

4.16 Hedgerows should be protected and enhanced due to their biodiversity benefits and distinctive visual features. The type of boundary treatments used to define the edge of the residential curtilage should be carefully considered in relation to the visual impact it will have on the surrounding area.

4.17 Additionally, consideration should also be given to how boundary treatments can influence the local ecological network. For example, fencing should look to incorporate design features to minimise the restriction of natural movement for local wildlife. Where possible, fencing structures that are completely impermeable should be avoided to avoid disruption to wildlife movement.

4.18 Extensions to residential curtilage can result in the land becoming domesticated and this may include the development of outbuildings, hard standings, domestic planting and associated domestic garden paraphernalia. Developments of this nature can have a direct impact on the visual landscape and therefore this needs to be factored in and considered. For



example, rural areas are characterised by dark skies with little to no lighting. External lighting that results in comprehensive coverage and brightness as part of the extension of a residential curtilage will have a significant impact on the visual landscape as well as disrupting the local biodiversity network. Extensions to residential curtilage can also result in new access being created or changes to existing accesses. Careful consideration of the potential impact is required when designing accesses, as alterations can cause notable changes to the interaction on the edge of settlements. Unless a new access is required for maintenance of the land it is recommended that these are avoided, and existing access are shared rather than additional access being created.



Boundary treatments appropriate for a rural location

Boundary Treatments

- 4.19 When extending a residential curtilage careful consideration should be given to the proposed boundary treatments. In this respect policy SCLP5.14 states that residential curtilage expansion will be permitted where:
- “They do not have a harmful impact on the historic environment, landscape or character of the area, including as a result of developments ancillary to the residential use; and
 - The proposed boundary feature of the extended curtilage is of a form which reflects its location and the character of the area.”
- 4.20 Post and rail timber fencing, hedgerows and trees create softer boundary edges that are more in keeping with the character of rural areas. Close boarded and panelled timber fencing creates a hard boundary, is characteristic of suburban areas and it is usually inappropriate in rural locations.

Historic Hedgerows

- 4.21 Hedgerows make an important contribution to character of the landscape and biodiversity of the area. The historic hedgerows and field boundaries form part of the local history and identity of an area. Extensions to residential curtilage that disrupt historic field boundaries should be avoided and instead such extensions should attempt to conform with field boundaries or reinstate historic field boundaries.
- 4.22 In this respect planning policy SCLP5.14 permits residential curtilage extension where:
- “They do not result in the removal of an existing hedgerow of native species unless replaced by a similar hedgerow.”



- 4.23 The [Hedgerow Regulations 1997](#)²³ provides protection to some historic hedgerows. Hedgerows are considered to be important where they have existed for 30 or more years and it:
- a) Marks a parish boundary that existed before 1850.
 - b) Marks the location of an archaeological feature of a site that is a schedule monument or is noted on the Historic Environment Record.
 - c) Marks the boundary of a pre-1600 estate, manor or field system pre-dating the Enclosure Acts.

Permitted Development Rights & Planning Conditions

- 4.24 Planning permission for residential curtilage extensions in the countryside in an area that could impact the character of the landscape may be granted subject to conditions removing permitted development rights.
- 4.25 Although permitted development may not apply to the land, there is often a public perception that the change of use enables permitted development. For the avoidance of doubt permitted development rights may be removed through a condition attached to the planning decision notice. An example of a condition to remove permitted development rights on the change of use of agricultural land to residential use is:

Notwithstanding the provisions of The Town and Country Planning (General Permitted Development) (England) Order 2015 as amended (or any Order revoking or re-enacting the said Order) no development of any kind specified in Part [1], Class E (Outbuildings, pools and enclosures) and Part [2], Class[es] [A] (gates, walls, fences) and [B] (means of access to the highway) of Schedule 2 of the said Order shall

be carried out unless planning permission has been granted by the local planning authority.

Reason: In order that the local planning authority may retain control over this particular form of development in the interests of visual amenity, the protection of the local environment, and the amenity of adjoining residents.

²³ www.legislation.gov.uk/ukSI/1997/1160/contents



5 Rural Buildings and Barn Conversions

- 5.1 Many barns and rural buildings, due to their size, location or layout no longer meet the needs of modern farming or other rural uses but they still form part of the character of the rural landscape and history of the local area. Converting barns and other rural buildings is one way they can be retained where they are also of value to the landscape or are heritage assets.
- 5.2 In recent years, with the introduction of permitted development uses of agricultural buildings, the role they have played in re-use for residential and employment purposes has expanded. Many of these buildings for re-use are modern and utilitarian in form and appearance, which contrasts with the established practice of past decades where such re-use was largely limited to traditional buildings. This chapter sets out some of the differences.
- 5.3 Redundant agricultural buildings can often make ideal places for small businesses, providing cheap, flexible accommodation for a variety of uses. They can also make good quality homes and provide some of the few opportunities for new housing in the countryside.
- 5.4 The locations of barns can be rural and remote due to their original agricultural use. Access to public transport may be unavailable or limited, with users of converted barns typically dependant on the private car for transport. The change of use may involve a change in the type vehicles accessing the site and number of vehicle trips. Where possible developments should maximise any opportunities for walking and / or cycling. Despite a lack of sustainable transport options, National and Local Plan policies permit the conversion of rural buildings to safeguard local heritage, support rural communities and support rural economies.

- 5.5 Proposals should ensure that there will not be an adverse effect on any existing nearby uses, residential or rural amenity, or the historic environment. The proposal should assess any potential problems relating not only to the nature of the proposed use, but also to the scale of activity, particularly the effect of external storage and work areas, access and parking facilities.
- 5.6 The design of any alterations to the building and to the site generally will also need to be sympathetically handled, and any works that are undertaken should form a positive improvement in the overall appearance of the building and its relationship to its landscape setting.



Llama Barn (Source: Mullins Dowse Architects)

- 5.7 Guidance is needed to ensure the buildings are converted in a way that respects the original character of the building and ensures the building continues to have a positive impact on the character of the rural landscape. Opportunities should be sought to enhance the setting of listed buildings by the use of traditional design and techniques and appropriate external



treatment. Common issues when converting barns are structural suitability of the building for conversion, retaining the fabric of the building, avoiding excessive re-build or replacement of fabric and the design of the conversion.

- 5.8 The Local Plans set out policies relating to converting barns and rural buildings into dwellings and for employment use. This chapter provides additional guidance to support the implementation of Local Plan policies.
- 5.9 The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) permits the conversion of some barns without the need for Planning Permission, and the criteria and conditions are set out in Class Q, Class R and Class S of the General Permitted Development Order. This SPD provides guidance on submitting an application for Prior Approval for the conversion of a barn to a dwelling under Class Q, Prior Approval for the conversion of an agricultural building to a flexible commercial use under Class R, and Prior Approval for the conversion of an agricultural building to state-funded school or registered nursery under Class S. Listed Buildings are excluded from Prior Approval and require Listed Building consent.

Policy

- 5.10 These are the key Local Plan policies relating to rural building and barn conversions:

Suffolk Coastal Local Plan policies:

- [Policy SCLP5.5: Conversions of Buildings in the Countryside for Housing](#)
- [Policy SCLP4.6: Conversion and Replacement of Rural Buildings for Employment Use](#)

Waveney Local Plan policies:

²⁴ <http://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Historic-Environment-SPD/Historic-Environment-SPD-reduced.pdf>

- [Policy WLP8.11: Conversion of Rural Buildings to Residential Use](#)
- [Policy WLP8.14: Conversion and Replacement of Rural Buildings for Employment Use](#)

Many traditional agricultural buildings are historic listed buildings or located within the setting of a listed building, such as a listed farmhouse or manor house. Information on the conversion of historic buildings in the countryside is available in the [Historic Environment SPD](#).²⁴

- 5.11 [National Planning Policy Framework \(NPPF\) paragraph 84](#) sets out that isolated homes in the countryside should be avoided except in specific circumstances which include “the development would re-use redundant or disused buildings and enhance its immediate setting.” Applicants applying for prior approval should also be mindful of the requirements set out in paragraph 84 of the NPPF and aim to enhance the building’s immediate setting and produce a design of exceptional quality.
- 5.12 The [Town and Country Planning \(General Permitted Development\) \(England\) Order 2015, Schedule 3 Permitted Development, Part 3 Change of use, Class Q – agricultural buildings to dwellinghouse](#) grants permitted development rights that allow the conversion of an agricultural building to a dwelling subject to criteria and conditions set in Class Q of the legislation. The criteria covers the length of time the building was in use for agricultural purposes, the size of building(s) that can be converted, number of dwellings that can be created, and what development and building operations are permitted to create a dwelling. The developer must apply to the local planning authority for a determination as to whether the prior approval of the authority will be required as to -



- (a) transport and highways impacts of the development,
- (b) noise impacts of the development,
- (c) contamination risks on the site,
- (d) flooding risks on the site²⁵,
- (e) whether the location or siting of the building makes it otherwise impractical or undesirable for the building to change from agricultural use to a use falling within Class C3 (dwellinghouses) of the Schedule to the Use Classes Order, and
- (f) the design or external appearance of the building, and
- (g) the provision of adequate natural light in all habitable rooms of the dwellinghouses.

5.13 The General Permitted Development Order, Schedule 3 Permitted Development, Part 3 Change of Use, Class R – agricultural buildings to a flexible commercial use grants permitted development rights that allow the conversion of agricultural buildings for commercial use subject to the criteria and conditions set out in Class R of the legislation. The criteria covers the length of time the agricultural unit has been in use, and the size of the unit. The developer must apply to the local planning authority for a determination as to whether the prior approval of the authority will be required as to –

- i. Transport and highways impacts of the development;
- ii. noise impacts of the development,
- iii. contamination risks on the site, and
- iv. flooding risks on the site²⁵.

5.14 The General Permitted Development Order, Schedule 3 Permitted Development, Part 3 Change of Use, Class S – agricultural buildings to state-funded school or registered nursery grants permitted development rights that allow the conversion of agricultural building for schools and nurseries subject to the criteria and conditions set out in Class R of the legislation. The criteria covers the length of time the agricultural unit has been in use, the floor space within the existing building, and land within the curtilage of the building. The developer must apply to the local planning authority for a determination as to whether the prior approval of the authority will be required as to –

- i. Transport and highways impacts of the development;
- ii. noise impacts of the development,
- iii. contamination risks on the site,
- iv. flooding risks on the site²⁵, and
- v. whether the location or siting of the building make it otherwise impractical or undesirable for the building to change to use as a state-funded school or, as the case may be, a registered nursery.

Planning Practice Guidance

5.15 The Government offers advice on Class Q permitted development rights in paragraphs 104 – 109 of the Planning Practice Guidance on when planning permission is required which is available to view here: www.gov.uk/guidance/when-is-permission-required

²⁵ The December 2023 NPPF requires a Flood Risk Assessment for any site at risk of flooding from any source.



Llama Barn (Source: Mullins Dowse Architects)

Policy Guidance

5.16 Topics covered in this chapter:

- Policy
- Key Principles
- Is the Building Convertible?
- Is the Building Structurally Sound?
- Planning Permission for the conversion of agricultural buildings to dwellinghouses

²⁶ <http://www.eastsuffolk.gov.uk/planning/planning-applications-and-enforcement/how-to-submit-a-planning-application/>

- Guidance on alterations to modern agricultural buildings
- General Guidance for converting agricultural buildings
- Class Q Prior Approval Developments
- Class R Prior Approval Developments
- Class S Prior Approval Developments

Planning Permission for the conversion of agricultural buildings to dwellings

5.17 Planning applications to convert an agricultural building into a dwelling or for a commercial use should consider a range of planning policies, alongside those listed above related specifically to conversions. This includes planning policies related to design, residential amenity, the historic environment, biodiversity, landscape character and sustainable transport. The overall approach to designing the conversion of an agricultural building is set out below in the key principles.

Key principles

- 1 Assess whether the location, access, size, scale and mass of the building is suitable for a dwelling and would result in a comfortable, functional home.
- 2 Determine whether the building is structurally sound and can withstand the necessary changes needed to convert it into a dwelling. Submit a Structural Survey as part of a planning application or Prior Approval application in accordance with the requirements the [East Suffolk Local Validation List](#).²⁶
- 3 Consider the barn's setting and relationship with other buildings. Some



agricultural buildings may be in isolated locations and others may form part of a collection of agricultural buildings. Agricultural buildings may be located near a farmhouse or on the edge of a village.

- 4 Consider the spaces between and around agricultural buildings. Farms have yards and buildings form courtyards. The conversion and use of space around a building can affect the setting and character of the converted building and any neighbouring buildings. Residential and commercial use curtilage should be confined to the immediate area around the building with Planning Conditions to remove Permitted Development Rights to ensure no inappropriate boundary treatments or subdivision of spaces. Retain any existing farm walls and avoid subdivision of spaces. Design gates to reflect the original use.
- 5 Identify the opportunities to enhance the character of the building, landscape, biodiversity and historic environment.
- 6 Extensions should not be necessary. Where needed, domestic style extensions such as conservatories or industrial style extensions should be avoided as they detract from the historic agricultural character of the building.
- 7 New outbuildings, sheds and garaging should not be necessary. Existing neighbouring barns, cart lodges and buildings should be utilised for parking and storage. Larger barns can be designed with externally accessible storage within the footprint of the building for garden furniture and equipment.
- 8 Identify the elements that contribute to the agricultural character and distinctiveness of the building and retain them in the design of the conversion. Retain existing openings. Avoid inserting standard domestic doors, windows and rooflights.



Converted agricultural buildings (Source: Clive Tanner FRICS, Hollins Architects, Surveyors & Planning Consultants)

Is the Building Convertible?

- 5.18 East Suffolk has a rich typology of historic agricultural buildings, most of which were grouped together to form farmsteads and which reflected the historic practices of pastoral farming. These groups follow a recognisable hierarchy of building types and positions. For example, the farmhouse was the principal building in the group which would have included a combination or all of the following: threshing barns, stables, granaries, cart shed, neathouse, and similar kinds of feed and animal storage structures. These buildings could be grouped around taking in yards, fold yards and milking yards, or organised more formally (High Victorian farming/Model Farms). Buildings were located in functional positions: cart sheds facing the fields they served and with enough turning space to allow carts to back in; barns accessible to hard road surfaces; animal shelter sheds away from the farmhouse to reduce odours. Understanding this hierarchy of function, the



Local typology of buildings and also their collective group value (where that exists) is vital to form the basis for a successful scheme of conversion.

5.19 Certain historic agricultural building types can make for more or less successful conversions, due to their form and spatial characteristics. Please follow the guidance here to test if your building is convertible:

5.20 **Barns:** this building type was used for storage and threshing of hay and was typically of timber framed construction with later examples in brick (but less common). Midstreys (porch) were added later to enlarge the entrance for a loaded wagon and larger horses, and to extend the threshing floor. Some barns had loft floors and clamp beams provide the evidence for these. Barns can be modest in scale or consist of multiple bays. They are the most important non-residential buildings in the farmstead and represented the most significant investment for a farmer for processing their crop.

5.21 Local Plan policies SCLP5.5 and WLP8.11 both permit rural buildings to be converted to residential use where the conversion requires minimal alteration, and the design maintains or enhances the structure, form and character of the rural building, amongst other criteria. Designs that require the minimum amount of alteration necessary for conversion will generally be preferred.

5.22 Barns are essentially windowless boxes (red then later black, externally) and consist of single uninterrupted internal spaces. Their scale makes them suitable for adaptation and conversion to residential and commercial use, in principle, and there are many successful examples from the around the district. These share common design features that should be considered at an early stage including:

- Maintaining the internal volume uninterrupted or with the minimum of subdivision.

- Avoiding the addition of internal floors; or where justifiable, ensuring that they imitate original loft floors at either end while maintaining the majority of the volume uninterrupted.
- Retaining any internally visible timber frame exposed (walls and roof structure).
- Re-using any existing external openings and strictly minimising the number of new openings.
- Ensuring that window and door designs are bespoke and avoid an overtly domestic character (such as use of glazing bars).
- Retaining surviving key features such as threshing floors, historic infill between framing, threshing doors and board slots, upper floor pitching doors, external butt boarding (that protected against animal damage) and incorporating these into the design.
- Avoiding overt domestication such as chimneys, for example, and retaining and respecting the strictly functional character of the building type and its linear volumetric form.



Example of internal volume retained, Bruisyard Hall Barns wedding venue (Source: Clive Tanner FRICS, Hollins Architects, Surveyors & Planning Consultants)

- 5.23 Where a barn has attached ranges, these should be utilised to accommodate smaller room uses such as services spaces in commercial use conversions and bedrooms in residential conversions, to avoid the main space of the barn being compromised by subdivision. Where there is historic map evidence for now lost attached ranges, it may be acceptable to recreate these to allow for retention of the barn's volume.
- 5.24 Contemporary and innovative approaches to the conversion of barns are encouraged, as this building type can lend itself to successful examples.
- 5.25 **Stables:** this is an eminently convertible building type, in principle. Stables are linear buildings with multiple openings that provided individual horse access and ventilation. Some stables included for hay storage above and, on higher status gentry farms, groom accommodation. Internal stall divisions or

the line of them can be used to form internal partitions. Surviving features of interest, such as hay racks, pegs for tack, harness hooks, and stable block floors should be sought to be retained and incorporated, where practicable. Existing openings should be utilised for the insertion of windows and doors where the existing are beyond repair.

- 5.26 **Cart sheds and granaries:** the first preference for the reuse of cart sheds is as vehicle storage, to maintain their characteristic open frontages. Infilling cart sheds for accommodation is a least preferred option, by comparison. However, a sensitive conversion scheme that, for example, retains the effect of open-ness through the use of fully glazed screening behind the bay posts could be feasible. Solid infill is not acceptable. Some cart sheds include granaries over and these can facilitate conversion to provide accommodation, provided that surviving features such as grain bins are retained and repurposed. These floors were accessed by external stairs which could be reinstated where now missing. Providing daylight into these spaces needs careful consideration as the use of rooflights should always be avoided.
- 5.27 **Animal shelter sheds:** these and their variants provide good potential for convertibility due to their spatial and functional character that can allow for flexible internal layouts and reuse of existing openings. Interesting surviving features such as tether posts and internal drainage gully's should be retained where practicable.

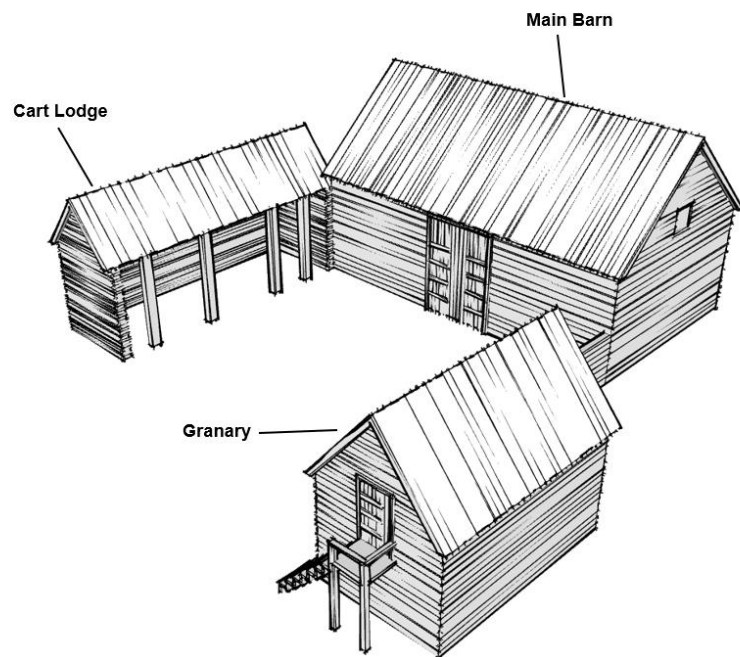


Figure 1 A redundant group of farm buildings as existing. Showing a main barn, cart lodge and granary.

Is the Building Structurally Sound

5.28 It is important that conversion proposals do not involve substantial replacement of structural elements. The work should be a ‘conversion’ not a ‘rebuild’ or a rebuild ‘by stealth’, whereby gradually over the duration of a conversion process, so much original material is replaced that the original structure plays no role in the structural integrity of the building.

- 5.29 The main frame or external walls and the roof of the building are considered to be structural for the purposes of assessing condition, and significant dismantling, demolition and re-erection of these elements would no longer constitute a genuine conversion.
- 5.30 Replacement of ‘weathering surfaces’, such as boarding, which traditionally require renewal from time to time, will normally be acceptable where absolutely necessary, provided materials and finishes match the existing building and are traditional in character. Where original infill exists, such as wattle and daub or lath and plaster, this should be retained as far as practicable.
- 5.31 Buildings without solid floors or foundations are particularly challenging to convert given extensive works would be required to provide floors and foundations for a residential use. This would also significantly affect the ability to retain a standing framework during construction and for that to be integral to the foundations. Such proposals would usually be considered a re-build unless the building had significant historic interest to justify a frame being dismantled and re-erected for a floor to be built.
- 5.32 If the structure of the building cannot be readily adapted to allow the use proposed without adversely affecting the integrity of its important elements, then permission will not normally be granted.
- 5.33 A Structural Survey should be submitted as part of a planning application or Prior Approval application in accordance with the requirements of the [East Suffolk Local Validation List](#)²⁷
- 5.34 A Conversion Specification should also be submitted that sets out the full

²⁷ <http://www.eastsuffolk.gov.uk/planning/planning-applications-and-enforcement/how-to-submit-a-planning-application/>

details of all works proposed. The Conversion Specification must be based upon a detailed Structural Survey, and these will be conditioned in any approval with expectation that the conversion build takes place only in accordance with those plans and the specification.

5.35 In the event that a building collapses or is taken down following planning permission being granted and prior to conversion works or during conversion works, it may be considered that the planning permission is no longer extant and has been invalidated. In such a situation the Local Planning Authority should be contacted immediately with information on the event and photographic evidence. In some circumstances, a building which has collapsed will be considered lost as a building and would not be accepted in policy terms for an alternative re-build planning application.



Bruisyard Hall Barns wedding venue (Source: Clive Tanner FRICS, Hollins Architects, Surveyors & Planning Consultants)

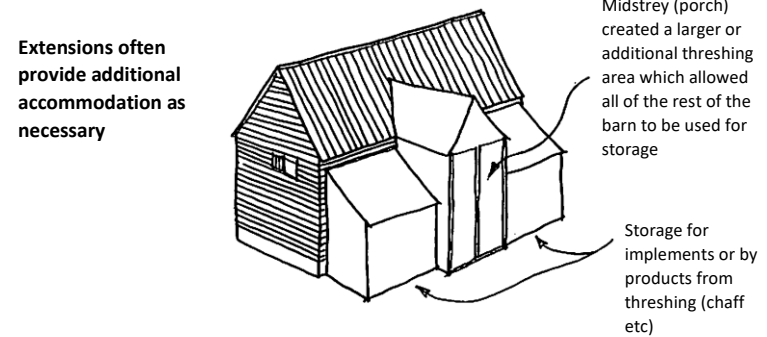
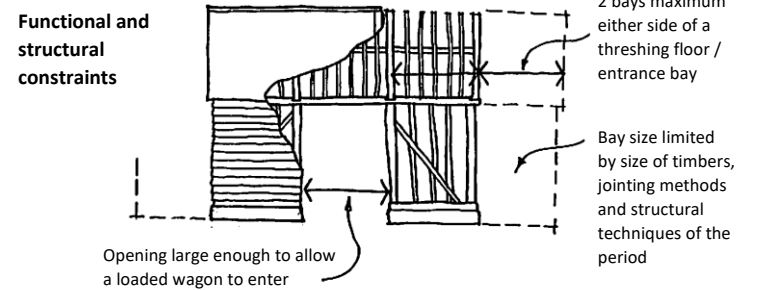
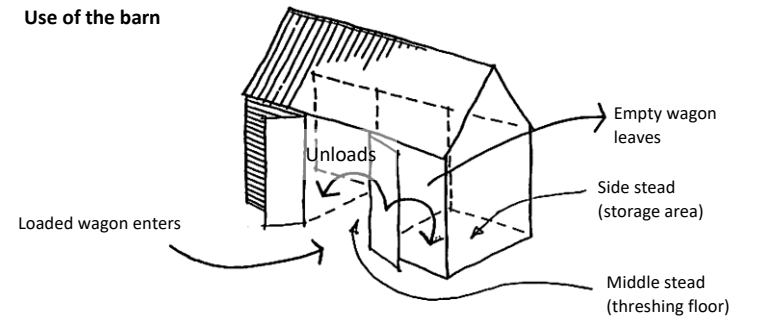


Figure 2 Diagram showing typical structure and use of traditional barn



Guidance on alterations to historic agricultural buildings

- 5.36 Historic England defines traditional agricultural buildings as those built in the 19th century or earlier. These buildings often have significant positive impact on the character of the village and/or surrounding countryside and contribute to the areas local distinctiveness. Traditional buildings are often constructed from local materials, using traditional construction methods in a locally distinctive style. Usually, the weathered and aged materials enable the buildings to blend easily with the landscape and their size, scale and form have a harmonious relationship with the surrounding buildings and landscape.
- 5.37 East Suffolk has a predominantly rural and agricultural history and character. There are many attractive, traditional agricultural buildings including brick barns and timber framed buildings which form a part of the area's local agricultural history and contribute to the character of the landscape but may no longer meet the needs of modern farming.
- 5.38 When considering converting a traditional agricultural building it is important to consider whether it is a building that is desirable to preserve. Does it have any historic value, any architectural importance or interest and how does it contribute to the character of the local village or surrounding countryside. Converting redundant traditional agricultural buildings offers an opportunity preserve part of the local agricultural history and character of the area. Any planning application for the conversion of an historic agricultural building should be accompanied by a Heritage Statement.

²⁸ <https://heritage.suffolk.gov.uk/home>

²⁹ <https://historicengland.org.uk/images-books/publications/historic-farmsteads-preliminary-character-statement-east-of-england/>

- 5.39 Applicants seeking information on the history of a farmstead should refer to the Suffolk Historic Environment Record which includes the results of the County's Historic Farmstead survey.

- [Historic Environment Record for Suffolk](#)²⁸
- [Historic Farmsteads: Preliminary Character Statement – East of England region by Historic England \(2006\)](#)²⁹
- [Farm Buildings and Traditional Farmsteads](#)³⁰



Collection of converted barns (Source: Clive Tanner FRICS, Hollins Architects, Surveyors & Planning Consultants)

³⁰ <https://historicengland.org.uk/advice/caring-for-heritage/rural-heritage/farm-buildings/>

**Making a positive contribution to the landscape**

- 5.40 The Suffolk Coastal and Waveney Local Plans both aim to support high quality conversions that make a positive contribution to the surrounding area. However, the wording of the policies is different in each Local Plan and different for residential and commercial use.
- 5.41 The Suffolk Coastal Local Plan policy SCLP5.5 permits the conversion of buildings in the countryside for residential use where the building provides a positive contribution to the landscape. Waveney Local Plans policy WLP8.11 permits the conversion of rural buildings where the building is locally distinctive and of architectural merit. Suffolk Coastal policy SCLP4.6 permits the conversion of rural building for commercial use where “the design and construction avoids, or adequately mitigates, any adverse impact on the character of the surrounding landscape, the National Landscape and its setting, or the natural or historic environment.” Waveney policy WLP8.14 permits the conversion of rural building for commercial use where “the proposal reflects the form and character of the existing building”.
- 5.42 The East Suffolk [Historic Environment SPD](#)³¹ (2021) provides detailed guidance on the conversion of historic buildings in the countryside for residential use. It includes information on understanding the existing building, architectural merit, local distinctiveness, the building’s contribution to the landscape, and design principles. Much of the advice is applicable to conversions for residential and commercial/ employment use.
- 5.43 The contribution to the character of the countryside which a building, or group of buildings make is determined by the architectural and historic quality of the building and its prominence and situation in the landscape.
- 5.44 In assessing the architectural and historic value of particular buildings the following factors are important:
- Listing
 - Age
 - Structure Quality
 - Completeness of Structure
 - Use of Traditional (original) Materials
 - Traditional Form, Design and Detailing
- 5.45 In determining landscape value, an assessment should be made of the importance of the building in relation to the landscape quality, in relation to the surrounding area generally and, how much the building adds to its visual attraction. The question to be asked is – Would the quality of the landscape suffer if the building were or be removed or altered?
- 5.46 In the landscape buildings are important because they provide scale and character to the rural scene. They should be visible from points of access or surrounding public footpaths, roads or land. Most modern rural buildings will not be considered to make a positive contribution to the landscape, irrespective of whether similar building may be capable of conversion under permitted development rights.
- 5.47 In many instances, traditional agricultural buildings in the countryside are considered of sufficient landscape value to warrant retaining the building either through adequate repairs or conversion.
- 5.48 East Suffolk has a variety of agricultural buildings of various ages, sizes, and states of repair. Traditional, pre-20th century rural buildings and barns often

³¹ www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Historic-Environment-SPD/Historic-Environment-SPD-reduced.pdf



form part of the local area’s agricultural history but may be redundant if they no longer meet the needs of modern farming. Traditional agricultural buildings are usually constructed from local materials and of a scale and form that sits comfortably in the landscape. These buildings contribute the distinctive character of the area and have a positive impact on the landscape. The repair, restoration and conversion of these buildings can retain and enhance the contribution they make to the landscape and historic environment.

- 5.49 In addition to the guidance found within this document further guidance can also be found in the Historic Environment SPD.³²

Character and important features of the building

- 5.50 A building judged to make a contribution to the character of the countryside in its existing form must be sympathetically converted if it is to continue to fulfil that function. The building should always clearly express its original use by retaining the essential qualities of its traditional form and detailing in a way which is easily recognisable.
- 5.51 Proposals to convert agricultural buildings should not affect the traditional features which contribute to, and reinforce, the expressed functional form of a building. Clusters of farm buildings, for example, rely heavily on plain, unbroken roof pitches, simple detailing and on their courtyard configuration for their character.
- 5.52 Demolition of important ancillary buildings and extensions which help to express the function and evolution of the building should normally be avoided. Demolition of inappropriate modern extensions or outbuildings,

³² <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Historic-Environment-SPD/Historic-Environment-SPD-reduced.pdf>

however, will be encouraged if the appearance of the building is thereby enhanced.



A well-designed barn conversion with the agricultural character retained, Church Farm Barn, Thorndon (Source: Craig Beech, Beech Architects)

Design and external appearance

- 5.53 Most traditional buildings are very simple, well-proportioned structures. Their form and use of natural materials such as brick, flint, weatherboarding, thatch and clay tiles enable them to contribute to the character of the countryside in a very significant and sympathetic way.
- 5.54 There are many different types which have developed over the years for a



multitude of different uses. The form of these buildings, being derived from a combination of functional necessity, the availability of local materials and the limitations of the constructional techniques of the period, has led to the development of building types of considerable refinement in terms of proportions and detailing, which are very highly valued in today's world. It is extremely important, therefore, that these qualities are understood and respected when attempting any sort of alteration.

5.55 The apparent simplicity of these buildings is a result of centuries of refinement. A key concern is the preservation of this essential character by keeping alterations to a minimum and ensure that they are sympathetic.

5.56 Timber framed barns usually have brick plinths with black painted exterior cladding. Timber roof structures are a distinct feature in traditional barns. Traditional single storey brick barns often have elevations with large, uninterrupted expanses of brick work, wide timber doors and possibly an open elevation supported by a series of timber posts. Two storey barns often have two storey height timber doors on opposite sides of the barn, small slit openings at high level for ventilation and few, if any, smaller window and door openings. It is important to identify and retain any distinctive features.

5.57 Detailed advice and guidance on the conversion historic agricultural buildings is available here:

- [Historic Environment Supplement Planning Document, Chapter 11 Conversion of Historic Buildings in the Countryside for Residential Use](#) (2021), East Suffolk Council.³³

³³ <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Historic-Environment-SPD/Historic-Environment-SPD-reduced.pdf>

- [Adapting Tradition Farm Buildings: Best Practice Guidelines for Adaptive Reuse](#) (2017) by Historic England.³⁴
- [The Adaptive Reused of Traditional Farm Buildings](#) (2017) by Historic England Advice Note 9.³⁵

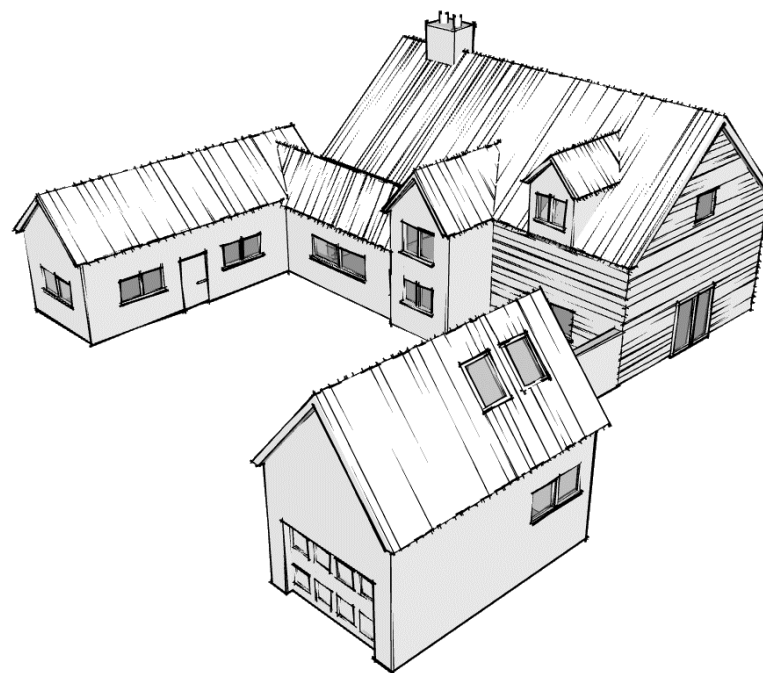


Figure 3 A proposal for conversion which is unacceptable due to the loss of agricultural character and overly domestic appearance

³⁴ <https://historicengland.org.uk/images-books/publications/adapting-traditional-farm-buildings/heag158-adapting-traditional-farm-buildings/>

³⁵ <https://historicengland.org.uk/images-books/publications/adaptive-reuse-traditional-farm-buildings-advice-note-9/>



Unbroken internal views of the roof retained, Church Farm Barn, Thorndon (Source: Craig Beech, Beech Architects)

Scale of development

- 5.58 Proposals for the conversion of a historic agricultural building should first seek to utilize the existing building(s) without the need for extensions or separate new buildings to provide sheds, garages or storage for businesses. Limited extensions to the original building may be appropriate in exceptional circumstances if it enables the character of important internal spaces to be retained.
- 5.59 Where a historic or traditional rural building or barn cannot be converted without the original building being extended, justification should be provided in the Design and Access Statement or Heritage Statement. The justification should demonstrate that different uses, designs and layouts have been considered. It should also demonstrate that an extension is a

necessary element of a viable conversion to retain the building as part of the local heritage. The use, design and layout which causes the least harm will be viewed the most favourably.

- 5.60 Historic barns often have handcrafted timber roofs which are exposed internally. The large, open space and uninterrupted views of the roof structure are an important feature of a historic barn. The design to convert the barn should seek to preserve these features. Smaller rooms, such as boot rooms, utility rooms and bathrooms, may be better located in adjoining lean-to structures to the side of the main barn, to enable the main space to remain open. Small extensions designed to be subservient in size, scale and design to the main barn may be appropriate to enable the main barn to remain open.

Traditional Barn Roofs

- 5.61 Agricultural buildings often have large, prominent roofs with unbroken roof slopes. Where possible the existing roof tiles should be re-used/recycled. Traditional roof materials can be sourced from buildings in the locality which are redundant, beyond repair and conversion, and due to be demolished. Traditional roof materials can also be sourced from reclamation yards. New high-quality materials are also acceptable in principle.
- 5.62 Historic agricultural buildings have exposed timber roof structures. A timber roof structure can be a significant characteristic of a traditional building. It adds interest to the building and is a key part of the experience of a barn. The timbers may have been hand carved and assembled without metal fixtures. Large roof trusses and purlins can be a key feature in the internal space and should be left exposed where possible. As much of the original timber as possible should be kept and repaired. Many traditional roofs are uneven where the roof has settled in between roof trusses but are nevertheless structurally sound. Roof repairs should not seek to eradicate



imperfections which contribute to character of the building and reflect its age.



Barn converted with unbroken roof expanse retained, Bruisyard Hall Barns wedding venue (Source: Clive Tanner FRICS, Hollins Architects, Surveyors & Planning Consultants)

New elements to a roof (Chimney, dormers & rooflights)

5.63 Adding new elements to a roof can alter a previous unbroken expanse, undermine a simple form and significantly change the external visual character of the building. Careful consideration should be given to the need to puncture the roof form. Brick chimneys, dormer windows, rooflights and porch roofs are inappropriate domestic features to add to a historic agricultural building. New metal flues should be as thin as practicably possible and be painted an unobtrusive matt finish.

Ground Floor

5.64 Many barns have modern concrete ground floors. Originally the ground floors would have had compacted earth, flagged stones or cobble floors. Original flagged stone or cobbled ground floors are rare and should be preserved.

First Floors

5.65 Often the height of beams and wall plates in larger traditional barns is too low to allow the insertion of a first floor. It can create problems when inserting window openings below eaves level. Split staircases, galleries and walkways can sometimes overcome problems often with dramatic effects. Wind and arched braces can also cause difficulties in terms of making use of interior spaces, but these must be kept not only for historic reasons, but also because they are an integral part of the structure of the building.



Redhouse Christmas Barn, Sternfield, Saxmudham



Converted barn with exposed timber stud walls retained, Bruisyard Hall Barns wedding venue (Source: Clive Tanner FRICS, Hollins Architects, Surveyors & Planning consultants)

Exterior Walls

- 5.66 The addition of insulation needs to be carefully considered with respect to allowing the timber frame to remain exposed internally and allowing the external brick plinth, where there is one, to be retained without a significant overhang where insulation is applied externally. Application of internal insulation to brick barns is usually considered acceptable, subject to details around openings.
- 5.67 Ventilation and access doors can be used for windows and the door retained as a shutter. Openings that have been blocked up in the past can be reopened.
- 5.68 Decorative and functional details, such as ventilation silts, patterned brickwork, buttresses, parapets and ironwork, should all be preserved. All original openings and their doors should be retained and not blocked in to

match the surrounding walls even if they are no longer required as a result of a conversion scheme.

- 5.69 Where it is necessary to block up openings, the infill should be recessed using a matching or appropriate material. If a historic doorway, the door should be retained and fixed shut. The original opening should remain legible on the elevation.
- 5.70 Existing brick and flint walls should not be rendered or painted.



Converted barn with a limited number of openings in the wall, Bruisyard Hall Barns wedding venue (Source: Clive Tanner FRICS, Hollins Architects, Surveyors & Planning Consultants)

Windows and Doors

- 5.71 The size and number of openings usually conveys how the building was originally used and contributes towards the character and appearance of the



building. The existing openings are therefore significant features which should be incorporated into the design for the conversion of the buildings.

- 5.72 The existing openings should be fully utilised to prevent or minimise the need for new openings. New glazing in openings should be inset and not flush with the exterior. Existing doors and shutters could be kept and fixed back against the wall either permanently or temporary during the day. Where possible existing lintels and ironmongery should be preserved.
- 5.73 The location of studwork and diagonal bracing in timber framed structures, which should not be cut, will often determine the location and form of new windows. Where new high level or first floor openings are necessary, horizontal strip windows tucked directly underneath the eaves are preferred. On the ground floor, windows with more vertical proportions set in between the studs or with heavy mullions may be acceptable. Outward opening lights where possible should be avoided. Inward, or sliding window openings will reduce the impact of a new window. Metal windows with thin sections are preferable to thick wooden ones. Plastic windows are wholly inappropriate.
- 5.74 New openings for windows and doors can dramatically change the character and appearance of a building. Any new openings should be necessary, justifiable, and kept to a minimum number. Regular patterns of small windows can give an agricultural building a more domestic appearance which is at odds with original character. New openings should not be of standard domestic size and design. New openings should reflect the proportions and design of existing openings. New windows can be made bespoke to fit between timber studs and gable ends can be glazed and covered with timber slats to reduce reflections and light spill.
- 5.75 New windows should be bespoke units and avoid domestic style designs. New lintels should replicate the existing brick, stone or timber lintel details

on the building.



Bespoke glazing on gable end, Bruisyard Hall Barns wedding venue (Source: Clive Tanner FRICS, Hollins Architects, Surveyors & Planning Consultants)

- 5.76 Windows and doors should be finished black to match the tarred weatherboarding on timber framed structures. On brick and flint agricultural buildings, black is also the most appropriate finish.

Guidance on alterations to modern agricultural buildings

- 5.77 Modern agricultural buildings are usually of a larger size, scale and mass than traditional buildings. Modern agricultural buildings are erected to be solely functional and accommodate the movement of large farm equipment and machinery. They are usually constructed from pre-fabricated elements with metal frames and metal sheeting cladding. The buildings have a utilitarian character and tend to contrast sharply with the surrounding landscape.



Making a positive contribution to the landscape

- 5.78 The policies in the two local plans contain some differences. The Suffolk Coastal Local Plan policy SCLP5.5 permits the conversion of buildings in the countryside for residential use where “the building provides a positive contribution to the landscape”. Waveney Local Plans policy WLP8.11 permits the conversion of rural buildings where the building is locally distinctive. Suffolk Coastal policy SCLP4.6 permits the conversion of rural building for commercial use where “the design and construction avoids, or adequately mitigates, any adverse impact on the character of the surrounding landscape, the National Landscape (previously AONB) and its setting, or the natural or historic environment.” Waveney policy WLP8.14 permits the conversion of rural building for commercial use where “the proposal reflects the form and character of the existing building”.

- 5.79 Modern agricultural buildings are often of large size and scale. They can be visually prominent and dominate the landscape. The size, scale, form and use of modern materials combine to result in a building that makes little or no positive contribution to the surrounding landscape. Once the agricultural use of a modern building has ceased, the justification for a large, visually intrusive buildings will also cease. The conversion of modern agricultural buildings are usually not successful. Applications for residential conversion will be refused if the proposal is not capable of making a positive contribution to the landscape relative to the negative impact the existing building has and the neutral impact that the absence of the building would have on the landscape. It may be preferable to remove some redundant buildings rather than convert them to alternative uses in order to better express the qualities of those worth converting.



Example of a more modern barn conversion (Source: Clive Tanner FRICS, Hollins Architects, Surveyors & Planning Consultants)

Design and external appearance

- 5.80 The design for the conversion of a modern agricultural building to a dwelling should retain the original character of the building and any positive contribution it makes to the rural landscape. Domestic elements and details such as brick chimneys, dormer windows, porches, sash windows, and the creation of domestic sizes and patterns of new windows should be avoided.

- 5.81 Modern agricultural buildings have simple forms, a utilitarian character and use a limited pallet of materials. Proposals to convert a modern agricultural building should seek to preserve the simple forms and agricultural character. Careful consideration needs to be given to the materials used, including the



colour, how the materials will weather and age, and any reflection and glare from the materials.

- 5.82 Consideration should be given to materials that are environmentally friendly and sustainable. Where possible use recycled materials, and locally sourced materials. The East Suffolk [Sustainable Construction SPD](#)³⁶ offers further guidance on materials.

Scale of Development

- 5.83 The conversion of a modern agricultural building should not require the construction of extensions or new buildings. Existing barns and agricultural buildings should be utilized for garaging and garden storage. Larger modern barns can incorporate externally accessible storage within the footprint of the building for garaging and the storage of garden furniture and equipment.

Modern Agricultural Building roofs

- 5.84 Agricultural buildings erected in recent decades usually have metal structural frames, a single open internal space and are clad in corrugate metal or asbestos. Corrugated sheets are usually chosen as they are typically a low-cost method of roofing and cladding a building. These buildings have simple forms and minimal detailing.
- 5.85 The more modern character of these buildings can be retained using new corrugated or sheet metal roofing. New black corrugate metal or a sheet metal with standing seams can both achieve a simple, contemporary aesthetic that is appropriate for the conversion of agricultural buildings. The

use of the same material on the roof and walls can enhance the clean lines and simple form of modern agricultural buildings.

New elements to a roof (Chimney, dormers & rooflights)

- 5.86 Agricultural buildings often have simple forms with large roofs. Altering a previous unbroken roof expanse can significantly alter the external appearance and character of a building. Careful consideration should be given to the need to puncture the roof form with new openings. New metal flues should be as thin as practicably possible and be painted an unobtrusive matt finish. Where it is necessary to install rooflights to bring daylight into the building, this should be justified, and the following should be considered:

- the number of rooflights should be kept to a minimum,
- rooflights should be located on the rear slope, not the principal elevation,
- they should be designed not to protrude above the roofline, and
- they should have non-reflective glass.

Windows and doors

- 5.87 Modern agricultural buildings usually have a limited number of openings. Existing openings are usually large to allow vehicle access. New openings for windows and doors can dramatically change the character and appearance of a building. New opening should be kept to a minimum. The size and design of new opening should reflect the building's original agricultural character.

³⁶ www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Sustainable-Construction-2022/FINAL-Sustainable-Construction-SPD.pdf



General Guidance for converting agricultural buildings

Landscaping setting including boundary treatments and parking

- 5.88 It is important to ensure that the setting of the converted buildings is enhanced through the use of land or other development associated with the new activity. Both local plan policies SCLP5.5 and WLP8.11 require the conversion of a building to residential use to enhance “the immediate setting of the area”. Policy SCLP4.6 permits the conversion of a building to commercial/employment use where “the design and construction avoids, or adequately mitigates, any adverse impact on the character of the surrounding landscape, the National Landscape (previously AONB) and its setting, or the natural or historic environment”. Policy WLP8.14 permits the conversion of a building for commercial/ employment use where “the proposal reflects the form and character of the existing building”.
- 5.89 Careful consideration will need to be given as the best means of catering for the requirements of domestic use, whilst minimising the impact on the landscape and setting of the building. Elements of particular concern include garages and garden sheds, boundary enclosures, soft and hard landscaping, access arrangements and vehicle parking and manoeuvring areas.
- 5.90 A well-designed conversion of an agricultural building can be undermined by an unsympathetic approach to the landscaping, boundary treatments, parking, access and use of ancillary buildings. The design and layout of the area around the barn should be in keeping with agricultural character of the building. The size and layout of new residential or commercial/employment curtilage around the barn conversion will need to be carefully considered and kept to a minimum.
- The boundary treatments used on farms and in rural locations are typically post and rail fencing, parkland railings, flint and brick walls

and hedgerows. Residential / suburban style close-boarded fencing to demark boundaries can be out-of-character in isolated rural locations and on farms.

- Permitted Development Rights will be removed when planning permission is granted for a barn conversion to prevent the erecting of inappropriate boundary treatments and subdivision of farm spaces around agricultural buildings.
- The design of new gates into the development should reflect the original agricultural use and character of the building.
- Large areas of tarmac and domestic paving should be avoided as they are out of character with the rural areas.
- Hard surface materials for parking and other uses should be appropriate to the original use and character of the building, such as gravel.
- The subdivision and demarcation of spaces around buildings should be avoided.
- Applicants are advised to avoid schemes that provide excessive soft domestic landscaping which changes the character of the building, farmstead and local rural area.
- Agricultural buildings that have successfully been converted to other uses will retain their original agricultural character and retain any positive impact they have on the landscape. They therefore do not need trees planted to screen them from view.

- 5.91 The introduction of new boundaries around and between agricultural buildings and farmhouses can change the historic relationship and hierarchy



between these buildings. The creation of private gardens and parking should be carefully considered. The loss of agricultural and rural character and change to the hierarchy of buildings could harm the setting of the building being converted and any neighbouring agricultural buildings and farmhouses.

Suitable for use in conjunction with an adjoining dwelling

- 5.92 Proposals to convert buildings must not leave an existing dwelling without adequate ancillary buildings leading to the need for new garages, storage buildings etc to replace the lost facilities. The proposed conversion must not have a detrimental impact on the residential amenity of existing dwellings on the farmstead or on the operation and viability of the existing agricultural holdings and other commercial uses.

New buildings or extensions

- 5.93 In order to retain their character and appearance, new extensions to existing buildings will not normally be allowed. Buildings proposed for conversion should, therefore, be of sufficient size and configuration to allow a reasonable standard of accommodation to be provided within the existing envelope. This should include adequate garaging, utility and external storage space as would normally be expected to be provided for the size of the residential unit proposed and the size of the plot of land that goes with it.

Residential ancillary outbuildings

- 5.94 Dwellings often have ancillary outbuildings such as garages, car ports, sheds, home offices and garden rooms. In a rural, agricultural context, ancillary domestic outbuildings can have a detrimental impact on the original agricultural character of the building being converted, the character of neighbouring agricultural buildings and the surrounding rural landscape.

- 5.95 Where possible nearby cart lodges and granaries should be converted and used for car parking, storage and other domestic ancillary uses. Where there are no existing buildings suitable for conversion, the design and location of any new ancillary outbuildings should be carefully considered and reflect the simple forms and agricultural character of the existing buildings.

- 5.96 When larger barns are being converted, consideration should be given to providing externally accessible storage for garden furniture and equipment within the footprint of the barn conversion. Use of the existing building's footprint for garden storage will prevent the need for unacceptable, domestic outbuildings that have a detrimental impact on the character of the original building and rural landscape.

- 5.97 Planning permission for the conversion of agricultural buildings for residential use will be conditioned to ensure planning permission is required for any ancillary buildings.

Natural Environment

- 5.98 Agricultural buildings and their surroundings can provide suitable habitats for various protected species, including bats, great crested newts and barn owls. Planning applications must be accompanied by an adequate ecological survey and assessment to enable the potential impacts of the proposal to be understood and considered. All ecological survey and assessment work must be undertaken by a suitably qualified ecologist following published best practice guidance. Where bespoke mitigation or compensation measures are required to address identified impacts, such as the inclusion of a designated bat loft within a development, these measures must be identified on relevant drawings within the planning application. It should also be noted that where bat roosting features are proposed within the roof structure of a building, the use of breathable roofing membrane (BRM) should be avoided, and more traditional bitumen based (or equivalent)



membranes should be used instead unless it has been confirmed that the proposed BRM is safe for use with bats.

- 5.99 Where a development is required to include mitigation measures for protected species (particularly roosting bats), or where enhancements for such species have been included as part of the design, it must be ensured that all external lighting is carefully designed and installed to avoid illuminating mitigation features or surrounding habitats.

Access

- 5.100 The conversion of an agricultural building to residential or employment uses will have an impact on local traffic. Large agricultural vehicles and equipment visiting the building will be replaced with more regular trips by cars. The creation of a single new dwelling is unlikely to generate harmful levels of traffic on the local highway network.
- 5.101 Where possible existing access to the building should be used. Communal access and driveways should be retained and multiple domestic access routes to a single farmstead avoided. New vehicle access and tracks through fields can overly domesticate the character of the rural landscape.

Class Q Prior Approval Developments

Conversion of agricultural buildings to dwellinghouses under Permitted Development rights

- 5.102 The [Town and Country Planning \(General Permitted Development\) Order 2015 \(as amended\) sets out in Schedule 2, Part 3, Class Q](#)³⁷ sets out where

³⁷ www.legislation.gov.uk/uksi/2015/596/schedule/2/part/3/crossheading/class-q-agricultural-buildings-to-dwellinghouses/made

³⁸ <https://www.gov.uk/government/consultations/permited-development-rights/consultation-on-additional-flexibilities-to-support-housing-delivery-the-agricultural-sector-businesses-high-streets>

development is permitted and the conditions under which development is permitted. The developer must apply to the local planning authority for a determination as to whether the prior approval of the authority will be required.

- 5.103 Please note that government is currently consulting on changes to Class Q³⁸. The consultation closed on the 25th September 2023.
- 5.104 The East Suffolk Council Local Validation Check List and Validation Guidance - Application Types provides a full list of the information that should be submitted as a minimum requirement for a Prior Approval Application. The information should be submitted to avoid a potential refusal on the basis of a lack of information.
- 5.105 The East Suffolk Council Local Validation Check List and Validation Guidance - Application Types is available here:

www.eastsuffolk.gov.uk/planning/planning-applications-and-enforcement/how-to-submit-a-planning-application/

Structural information to accompany an application for Prior Approval of a conversion of agricultural buildings to dwellinghouses

- 5.106 The Town and Country Planning (General Permitted Development) Order 2015 (as amended) sets out in Schedule 2, Part 3, Class Q, permits the 'conversion' of an agricultural building, not the demolition and rebuild.
- 5.107 The difference between conversions and rebuilding was explored and confirmed by "[Hibbitt and another v Secretary of State for Communities and](#)

[and open prisons and a call-f#supporting-housing-delivery-through-change-of-use-permitted-development-rights](#)



[Local Government \(1\) and Rushcliffe Borough Council \(2\) \[2016\] EWHC 2853 \(Admin\)](#)” as referenced in paragraph 105 (reference ID 13-105-20180615 of the [NPPG](#)).



Agricultural building converted Under Class Q Permitted Development Rights, Mells, Halesworth

5.108 Therefore, it is in the applicant's interest to submit sufficient and appropriate documentation to demonstrate that the building is structurally sound and capable of ‘conversion’ without substantial works over and above those permitted by paragraph Q.1 (i) which allow for certain building works

reasonably necessary to facilitate ‘conversion’ but not substantive rebuilding or replacement of the existing building.

5.109 To avoid a potential refusal on the basis of lack of information, to demonstrate compliance with Q.1 of the regulations or acceptability under paragraph Q.2 of the regulations (explored below) developers are strongly encouraged to refer to the East Suffolk Local Validation Requirements for guidance and submit:

- Existing and Proposed Floor Plans all floors of the building, showing existing/proposed uses and the extent of any physical works, including demolition.
- Existing and Proposed Elevational drawings showing all proposed works.
- Flood risk assessment for sites in Flood Zones 2 or 3³⁹.
- A Structural Survey.
- A Conversion Specification setting out full details of all works proposed, which must be based upon a detailed Structural Survey.
- Ecological Surveys and Assessments.
- Land Contamination Assessments

5.110 The information submitted should clearly show the development is a conversion, not a demolition and rebuild.

5.111 Traditional barns commonly have brick walls, timber-framed and timber clad walls, pantile roof and sometimes thatch roofs. Care should be taken to retain as much of the original fabric of the building as it forms an essential part of the character and appearance of the building.

³⁹ The December 2023 NPPF requires a Flood Risk Assessment for any site at risk of flooding from any source.

**Residential curtilage**

5.112 The Town and Country Planning (General Permitted Development) Order 2015 (as amended) defines “curtilage” for the purposes of Class Q as –

- a) “the piece of land, whether enclosed or unenclosed, immediately beside or around the agricultural building, closely associated with and serving the purposes of the agricultural building, or
- b) an area of land immediately beside or around the agricultural building no larger than the land area occupied by the agricultural building,

whichever is the lesser;”⁴⁰

5.113 Once converted to residential use the curtilage permitted through Class Q may be considered insufficient in size for the use and enjoyment of the proposed new home. East Suffolk Council supports the development of new homes that provide sufficient curtilage to meet the needs of the occupants. However, any extension to or expansion of the curtilage would require planning permission and the potential benefits to the occupants of the dwelling of having a larger garden have to be balanced against potential landscape impacts that may arise if the curtilage is overly large and/or in a prominent position. A new home depending on its size and location may require onsite car parking for one or more vehicles, an onsite vehicle turning area, space for patio areas/outside dining, lawn and areas for recreational enjoyment.

5.114 Where permitted development rights in Class Q provide insufficient curtilage beside or around a building, it is recommended that a planning application

for the conversion of land from agricultural use to residential use is submitted together with the application for Prior Approval for change of use of the agricultural building to residential. The applications can run concurrently preventing any unnecessary delay to the development.

5.115 The aim of the planning application should be to provide a residential curtilage that enables the barn conversion to function well as a home while preserving the original agricultural character of the building and rural character of the area.

Ancillary outbuildings/garaging and permitted development rights

5.116 The General Permitted Development Order does not provide for the construction of new ancillary building onsite.

A planning application is required for any new buildings within the curtilage of an agricultural building converted to residential use under Class Q permitted development rights.

5.117 Wherever possible proposals for existing buildings should be designed and utilised to meet the needs of future occupants. Larger barns can be designed with externally accessible storage for garden furniture and equipment. Existing cart lodges can be used for parking.

Extensions and permitted development rights

5.118 The Town and Country Planning (General Permitted Development) Order 2015 (as amended) does not permit the existing agricultural building to be extended as part of a Class Q Prior Approval application and limits the size

⁴⁰ www.legislation.gov.uk/ukxi/2015/596/schedule/2/part/3/crossheading/class-q-agricultural-buildings-to-dwellinghouses/made



of the conversion to no more than 450 square metres. Class Q 1 states development is not permitted if:

- g) the development would result in the external dimensions of the building extending beyond the external dimensions of the existing building at any given point
- h) the development under Class Q (together with any previous development under Class Q) would result in a building or buildings having more than 450 square metres of floor space having a use falling within Class C3 (dwellinghouses) of the Schedule to the Use Classes Order.⁴¹

5.119 All applications for a Class Q Prior Approval must not extend beyond the external dimensions of the building or exceed 450sqm. All other proposals should apply for Planning Permission.

5.120 A dwelling created through a Class Q conversion would also not benefit from Permitted Development Rights for alterations and extensions in the future, and therefore such works would require planning permission.

Issues determined by the Local Planning Authority

5.121 The General Permitted Development Order, Class Q requires the developer to apply to the local planning authority to determine as to whether the prior approval of the authority will be required as to –

- a) Transport and highways impacts of the development,
- b) Noise impacts of the development,
- c) Contamination risk of the site,

- d) Flooding risks on site⁴²,
- e) Whether the location or sitting of the building make it otherwise impractical or undesirable for the building to change from agricultural use to a use falling within Class C3 (dwellinghouse) of the Schedule to the Use Classes Order,
- f) The design or external appearance of the building, and
- g) The provision of adequate natural light in all habitable rooms of the dwellinghouse.

5.122 The provision of onsite parking, turning areas and safe vehicle access could affect the transport and highway impacts of the development and how practical and desirable it is to convert the building.

5.123 Safe vehicle access off the highway to the new dwelling is very important. Any existing agricultural field access is likely to need to be improved to meet Suffolk County Council's Highway Department's requirements for a residential access. An existing access may need wider vision splays, passing bays, or a wider track/driveway. Where there is an existing access to the farmstead this should be utilised to avoid multiple tracks across fields which can overly domesticate the character of the landscape. Consideration should be given to the guidance above on access in paragraphs 5.100 and 5.101.

5.124 Many barns form part of a farmstead with an existing farmhouse, workers cottages, barns, cartlodes, granaries and other buildings all grouped together in close proximity. The conversion of the barn should not have a detrimental impact due to noise on the use of surrounding properties. Some of the nearby buildings may remain in agricultural use or have other diverse uses connected to the farm. The existing uses of the surrounding properties should also not have a detrimental impact due to noise on the proposed

⁴¹ www.legislation.gov.uk/ukxi/2015/596/schedule/2/part/3/crossheading/class-q-agricultural-buildings-to-dwellinghouses/made

⁴² The December 2023 NPPF requires a Flood Risk Assessment for any site at risk of flooding from any source.



dwelling. Noise from surrounding uses could result in the conversion to a dwelling being impractical or undesirable.

5.125 Applicants should submit a Land Contamination Report. The purpose of the report is to determine if there are any unacceptable risks to people if the building is converted to a dwelling.

5.126 Applicants should submit a Flood Risk Assessment for all proposals to convert a building to a dwelling. Guidance on Flood Risk Assessment is available in the East Suffolk Local Validation Checklist. [Suffolk County Council is the Lead Local Flood Authority](#) (LLFA) under the Town and Country Planning Order 2015. They are a Statutory Consultee and offer a pre-application advice service. Information is available online on the Suffolk County Council [website](#).⁴³

5.127 The location or sitting of the building could make a dwelling otherwise impractical or undesirable. Reasons include:

- a) Have a detrimental impact of the residential amenity of existing dwellings,
- b) hinder the efficient working of the farm, and
- c) hinder efficient working of other existing uses of buildings and businesses on site.

5.128 The design and external appearance of the building should retain the existing simple, utilitarian, agricultural character of the original building. Consideration should be given to the design guidance provided above in paragraphs 5.36 and 5.76.

5.129 Utilising large existing openings together with a well-designed layout can ensure each habitable room has natural light. Existing openings should be utilised to minimise the need for new openings which can change the character and appearance of a building. Consideration should be given to the guidance provided above on windows and doors in paragraphs 5.68 – 5.71 and 5.76.

Planning permission for alternative new build dwellings following grant of Prior Approval for a conversion of an agricultural building to a dwellinghouse

5.130 The conditions set out in Class Q of the General Permitted Development Order do not provide for much influence on design quality and do not always deliver well designed, functional homes. Some modern agricultural buildings converted under Class Q are of a scale, mass and appearance that their conversion has and would result in homes out of character with the surrounding buildings and landscape and in some cases these have been visually harmful to rural landscapes and the setting of Listed Buildings.

5.131 East Suffolk Council supports high quality design and the delivery of homes that are appropriate in size, scale and mass to the surrounding area. Some Class Q conversions result in poorly designed homes being delivered. It is not mandatory for an applicant to seek alternatives to Class Q conversions, nor is it mandatory for Councils to offer an alternative to delivering homes through Class Q conversions. However, East Suffolk Council aims to secure the best possible design outcomes both for the future occupant of homes and the local community. In having regard to material considerations, alternatives to Class Q conversions may, in exceptional circumstances,

⁴³ www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk



deliver a more positive outcome for the locality than would be achieved under Class Q.

5.132 The following points may form material considerations that would need to be weighed up as part of decision taking:

- Class Q Prior Approval has been granted and the Class Q Prior Approval is a genuine fallback position with all necessary conditions discharged and, in the case of Class Q, it would be possible to complete the approved scheme well within the 3 year time period.
- The building with Prior Approval for a Class Q conversion would in the planning application for a proposed new dwelling be utilised in a conversion, or demolished and replaced.
- The location of the proposed new dwelling subject to the planning application is on the same footprint as the existing agricultural building proposed to be demolished, unless there is well justified reasoning for a proposed new dwelling of a modest size and scale in an alternative, close location.
- The planning application proposal would deliver a dwelling of a size, scale and mass that is more appropriate to the setting and character of the area, landscape or historic setting than the scheme with Prior Approval for a Class Q conversion.
- The proposed new dwelling subject to planning permission would deliver a dwelling of significantly higher design quality and environmental standards than the scheme with Prior Approval for a Class Q conversion.

⁴⁴ <https://www.legislation.gov.uk/uksi/2017/1012/regulation/9/made>

5.133 East Suffolk Council Planning Service offers a pre-application advice service. Applicants are advised to seek pre-application advice prior to the submission of a planning application for a new dwelling which can be found at:

www.eastsuffolk.gov.uk/planning/planning-applications-and-enforcement/find-out-if-you-need-planning-permission/pre-application-advice-service/

Habitats Directive and Habitats Regulations

5.134 Regulation 9 of the Conservation of Habitats and Species Regulations (2017)⁴⁴ (as amended) requires that local planning authorities must comply with the requirements of the Habitats Directive (Council Directive 92/43/EEC) in exercising their functions. Therefore, in determining Prior Approval applications the planning authority must consider the potential impacts of the proposal on species and habitats protected under the Directive and the Regulations. An applicant should provide all necessary ecological survey and assessment information as part of such an application, and where necessary ecological mitigation or compensation measures may be required as part of the development.



Class R Permitted Developments

Conversion of agricultural buildings to a flexible commercial use under Permitted Development rights

- 5.135 The Town and Country Planning (General Permitted Development) Order 2015 (as amended) sets out in Schedule 2, Part 3, [Class R](#)⁴⁵ where development is permitted and the conditions under which development is permitted. The developer must apply to the local planning authority for a determination as to whether the prior approval of the authority will be required.
- 5.136 The General Permitted Development Order defines the permitted flexible commercial use as Class B8 storage or distribution, Class C hotels and Class E commercial, business or service of the Use Class Order.
- 5.137 The requirements set in R1 state the cumulative floor space of the buildings which have changed use under Class R cannot exceed 500sqm within an agricultural unit. Under section R3 (1) (b) the developer must apply the local planning authority for prior approval if the cumulative floorspace of the building(s) to change use exceeds 150 sqm.
- 5.138 The local planning authority is required to determine as to whether the prior approval of the authority is required as to –
- i. Transport and highways impacts of the development;
 - ii. noise impacts of the development,
 - iii. contamination risks on the site, and
 - iv. flooding risks on the site⁴⁶.

⁴⁵ www.legislation.gov.uk/uk/si/2015/596/schedule/2/part/3/crossheading/class-r-agricultural-buildings-to-a-flexible-commercial-use/made

Submitting an application for Prior Approval.

- 5.139 Class R permits the ‘conversion’ of agricultural buildings, not the demolition and rebuild. It is in the applicant’s interest to submit sufficient and appropriate documentation to demonstrate that the building is structurally sound and capable of ‘conversion’.
- 5.140 To avoid a potential refusal on the basis of lack of information and to demonstrate compliance with R.3 of the regulations, developers are strongly encouraged to refer to the East Suffolk Local Validation Requirements for guidance and submit:
- Existing and Proposed Floor Plans of all floors of the building, showing existing/proposed uses and the extent of any physical works, including demolition.
 - Existing and Proposed Elevational drawings showing all proposed works.
 - Flood risk assessment for any site at risk of flooding from any source.
 - A Structural Survey.
 - A Conversion Specification setting out full details of all works proposed, which must be based upon a detailed Structural Survey.
 - Ecological Surveys and Assessments.
 - Land Contamination Assessments.

The information submitted should clearly show the development is a conversion, not a demolition and rebuild.

⁴⁶ The December 2023 NPPF requires a Flood Risk Assessment for any site at risk of flooding from any source.



Class S Permitted Developments

Conversion of agricultural buildings to state-funded school

- 5.141 The Town and Country Planning (General Permitted Development) Order 2015 (as amended) sets out in Schedule 2, Part 3, [Class S](#)⁴⁷ where development is permitted and the conditions under which development is permitted. The developer must apply to the local planning authority for a determination as to whether the prior approval of the authority will be required.
- 5.142 The General Permitted Development Order defines the permitted school development as a state-funded school falling within Class F.1 (a) of the Use Class Order.
- 5.143 The requirements set in S.1(b) states the cumulative floor space of the buildings which have changed use under Class S cannot exceed 500sqm within an agricultural unit. S.2 (a) requires the site be used as a state-funded school and for no other purpose, except to the extent that the other purpose is ancillary to the primary use of the site as a school.
- 5.144 The local planning authority is required to determine as to whether the prior approval of the authority is required as to:
- i. Transport and highways impacts of the development;
 - ii. noise impacts of the development,
 - iii. contamination risks on the site,
 - iv. flooding risks on the site⁴⁸, and

- v. whether the location or siting of the building make it otherwise impractical or undesirable for the building to change to use as a state-funded school or, as the case may be, a registered nursery.

Submitting an application for Prior Approval.

- 5.145 Class S permits the ‘conversion’ of agricultural buildings, not the demolition and rebuild. It is in the applicant’s interest to submit sufficient and appropriate documentation to demonstrate that the building is structurally sound and capable of ‘conversion’.
- 5.146 To avoid a potential refusal on the basis of lack of information and to demonstrate compliance with S.2 of the regulations, developers are strongly encouraged to refer to the East Suffolk Local Validation Requirements for guidance and submit:
- Existing and Proposed Floor Plans all floors of the building, showing existing/proposed uses and the extent of any physical works, including demolition.
 - Existing and Proposed Elevational drawings showing all proposed works.
 - Flood risk assessment for any site at risk of flooding from any source..
 - A Structural Survey.
 - A Conversion Specification setting out full details of all works proposed, which must be based upon a detailed Structural Survey.
 - Ecological Surveys and Assessments.
 - Land Contamination Assessments.

⁴⁷ www.legislation.gov.uk/uksi/2015/596/schedule/2/part/3/crossheading/class-s-agricultural-buildings-to-statefunded-school-or-registered-nursery#commentary-key-bb256dbcfad7d225d9b2940554ecc50a

⁴⁸ The December 2023 NPPF requires a Flood Risk Assessment for any site at risk of flooding from any source.



- 5.147 The information submitted should clearly show the development is a conversion, not a demolition and rebuild.
- 5.148 The location or sitting of the building could make a school otherwise impractical or undesirable. The developer is advised to liaise with Suffolk County Council, the Education Authority, to determine whether there is sufficient local demand for a new school, there is sufficient funding to run the state-funded school and ensure that a new school would not undermine the viability of existing schools.



6 Economic Development

- 6.1 Rural areas experience many different types of economic development. Economic development helps to create employment opportunities, increase the wealth of rural areas and provides funding to support local businesses and services. Economic development is also particularly important as traditional activities such as agriculture are undergoing a period of considerable change and many farms are looking to diversify their businesses in order to reduce their reliance on growing and selling food. However, it is also necessary to minimise negative impacts which may arise, such as pollution, traffic congestion and issues such as unwanted noise and odour that can significantly affect surrounding areas. Such issues can have a particular impact within the more sensitive landscapes including the National Landscape (formerly AONB) and Heritage Coast and the also adjoining Broads Authority area. One of the key roles of planning in rural areas is to ensure that economic development is compatible with surrounding uses, including residential areas.
- 6.2 There are certain issues linked to all types of rural economic development that need to be mitigated.
- 6.3 These are the key Local Plan policies relating to economic development in rural areas.

Suffolk Coastal Local Plan Policies:

- Policy [SCLP3.2: Settlement Hierarchy](#)
- Policy [SCLP4.2: New Employment Development](#)
- Policy [SCLP4.3: Expansion and Intensification of Employment Sites](#)
- Policy [SCLP4.5: Economic Development in Rural areas](#)
- Policy [SCLP4.6: Conversion and Replacement of Rural Buildings for Employment Use](#)

- Policy [SCLP4.7: Farm Diversification](#)
- Policy [SCLP6.3: Tourism Development within the AONB and Heritage Coast](#)
- Policy [SCLP6.4: Tourism Development Outside of the AONB](#)
- Policy [SCLP7.1: Sustainable Transport](#)
- Policy [SCLP7.2: Parking Standards and Proposals](#)
- Policy [SCLP9.5: Flood Risk](#)
- Policy [SCLP9.6: Sustainable Drainage Systems](#)
- Policy [SCLP9.7: Holistic Waste Management](#)
- Policy [SCLP10.1: Biodiversity and Geodiversity](#)
- Policy [SCLP10.3: Environmental Quality](#)
- Policy [SCLP10.4: Landscape Character](#)
- Policy [SCLP11.1: Design Quality](#)
- Policy [SCLP11.4: Listed Buildings](#)
- Policy [SCLP11.5: Conservation Areas](#)
- Policy [SCLP11.6: Non-Designated Heritage Assets](#)

Waveney Local Plan policies:

- Policy [WLP1.1: Scale and Location of Growth](#)
- Policy [WLP8.12: Existing Employment Areas](#)
- Policy [WLP8.13: New Employment Development](#)
- Policy [WLP8.14: Conversion and Replacement of Rural Buildings for Employment Use](#)
- Policy [WLP8.15: New Self-Catering Tourist Accommodation](#)
- Policy [WLP8.21: Sustainable Transport](#)
- Policy [WLP8.24: Flood Risk](#)
- Policy [WLP8.29: Design](#)
- Policy [WLP8.34: Biodiversity and Geodiversity](#)
- Policy [WLP8.35: Landscape Character](#)
- Policy [WLP8.38: Non-Designated Heritage Assets](#)



- Policy [WLP8.39: Conservation Areas](#)

Neighbourhood Plans

6.4 Many neighbourhood plans⁴⁹ contain policies about economic development. This includes allocations for economic development, as well as policies that mitigate the impacts of development.

National Planning Policy Framework, December 2023

- 6.5 Paragraph 88. 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;
 - b) the development and diversification of agricultural and other land-based rural businesses;
 - c) sustainable rural tourism and leisure developments which respect the character of the countryside; and
 - d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

Paragraph 85. 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

⁴⁹ <https://www.eastsuffolk.gov.uk/planning/neighbourhood-planning/neighbourhood-plans-in-the-area/>

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.

Policy Guidance

- 6.6 Topics covered in this chapter:
- Location
 - Practical Considerations
 - Impact on Surrounding Uses
 - Access
 - Design and Landscaping
 - Factories and Workshops
 - Development of Former Airfields
 - Storage and Distribution
 - Farm Diversification
 - Dog Paddocks
 - Farm Shops and Cafés
 - Leisure

Location

Settlement hierarchy

6.7 In addition to development in major centres and on larger site allocations, the Local Plan also seeks to encourage appropriate levels of economic



development in rural areas, whether by way of allocations or through the circumstances outlined in policies WLP8.13, WLP8.14, SCLP4.2 and SCLP4.5, SCLP4.6 and SCLP4.7; The guidance in this chapter primarily relates to economic development by way of the latter. A number of Existing Employment Areas also exist in rural areas, whereby proposals for new employment development would be supported in principle.

- 6.8 The Local Plans direct employment development to relevant site allocations, within existing Employment Areas, or within Settlement Boundaries where there would not be an unacceptable impact on surrounding uses. New employment development located outside of allocations, Existing Employment Areas and Settlement Boundaries, will normally be limited in scale and should be located so as to minimise landscape impact.
- 6.9 Tourism uses are often located in rural areas and include accommodation, caravan sites, recreation activities and retail. Tourism uses should be located and designed so as to minimise landscape impact and impact on the rural road network.
- 6.10 New economic development in rural areas should be consistent with the vision and policies for the area set out in the relevant neighbourhood plan, where one exists.
- 6.11 East Suffolk contains a number of Special Conservation Areas (SCAs), Special Protection Areas (SPAs) and Ramsar sites, which are internationally recognised wildlife assets. Economic development that could affect any of these sites through proximity, recreational pressure or environmental effects will require a project level habitats regulation assessment to determine the effects and any necessary mitigation.

It is important to understand that rural locations can only accommodate a limited amount of development. For example, once existing farm buildings

have been utilised for a new business the setting and surrounding landscape might only be able to accommodate limited new development without having a detrimental impact. The character of the surrounding area should be maintained. For a business to expand on a larger scale it may be necessary to consider alternative locations within the settlement boundaries of nearby towns and villages, as well as existing or allocated employment areas. In some locations the setting and landscape may not be able to accommodate any new development.

Road network

- 6.12 Economic development of any sort should include access to the main road network. This is to ensure safe and quick access for heavy goods vehicles as well as cars. Economic development should also be designed and planned so as to minimise impact on the surrounding road network.

Sustainable transport

- 6.13 Employment development of any kind should be accessible by sustainable forms of transport. This includes cycling and walking, which will also benefit the health of employees of development sites and will help local people to access employment opportunities in the area where they live. Employment sites should also be linked to local, regional and national cycle routes. Employment development should also be accessible by public transport and so should be built close to existing bus routes where possible.



6.14 For further guidance it is necessary to contact the Development Management pre application advice service.⁵⁰

Practical considerations

Connecting to utilities

6.15 Economic development in rural areas depends on good connections to utilities providers. The increase in remote working and use of the internet in recent years means that good internet connectivity is becoming very important. Economic development proposals in rural areas should ensure good connectivity to the following utilities:

- Electricity
- Water (including both potable and foul water)
- Gas
- Internet
- Mobile phone

Site Security

6.16 New businesses and occupants will require that their premises be properly secured, particularly outside of normal working hours. This can include the erection of security fencing at the edge of a premises. Fencing should be designed so as to blend in with site landscaping. It should not be any higher than hedgerows and trees and should be painted dull colours such as green, black or grey which are preferred. Security gates should be designed so as to appear similar to security fencing.

⁵⁰ <https://www.eastsuffolk.gov.uk/planning/planning-applications-and-enforcement/find-out-if-you-need-planning-permission/pre-application-advice-service/>

6.17 Security lighting should be designed and constructed to minimise disruption to neighbouring uses. This includes installing security lights at a height and angle at which light pollution of surrounding areas is minimised. Security lighting should have limited hours of operation so as to minimise disruption to surrounding uses. Where possible, security lighting should not be left on all night. Proposals for security lighting as part of economic development should be thoroughly justified.

Sustainable Drainage

6.18 Economic development in rural areas should be designed so as to minimise flood risk. Economic development should be located away from areas that are at risk from flooding. Where it is necessary to locate development in areas at risk from flooding there should be mitigation measures in place. Suffolk Coastal Local Plan [policy SCLP9.5](#) (Flood Risk) and Waveney Local Plan policy [WLP8.24](#) (Flood Risk) both require development to be safe from flooding.

6.19 Controlling flood risk should include a plan for delivering sustainable drainage on the site. Sustainable drainage should be an integral part of any proposal and should be a central consideration throughout the design process. Drainage should be incorporated into landscaping on the site and should also be an important part of measures to protect and enhance biodiversity. Suffolk County Council is the Lead Local Flood Authority for Suffolk. It is responsible for planning and coordinating the County's response to flooding.⁵¹

⁵¹ <https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk?nodeId=f8da02df-f209-588b-8264-5fc32f87b1e9&entryId=ba273aa4-e1fb-5a2c-a488-eff49d333eb5>



- 6.20 A key part of minimising flood risk is to ensure that the local sewer network has adequate capacity to accommodate new development.
- 6.21 Suffolk County Council as Lead Local Flood Authority has prepared the Suffolk Local Flood Risk Management Strategy⁵², which sets out how flood risk in Suffolk will be managed in partnership with other organisations in the County.
- 6.22 Further information about planning and flood risk can be found in the National Planning Policy Framework⁵³.
- 6.23 Further information about sustainable urban drainage standards can be found in the National Planning Practice Guidance on flood risk and coastal change⁵⁴.

Biodiversity Protection

- 6.24 Development should create new green infrastructure opportunities and protect existing green infrastructure. Suffolk Coastal Local Plan policy SCLP10.1 (Biodiversity and Geodiversity) and Waveney Local Plan policy WLP8.34 (Biodiversity and Geodiversity) both seek to protect and enhance biodiversity as part of the development process.
- 6.25 Ecological impacts arising from new development must be assessed by a suitably qualified ecologist. Development must try to avoid any ecological impacts. If that is not possible then mitigation measures should be included. Compensation should only be considered if avoidance or mitigation measures are not possible. Development should provide environmental net gains both in terms of green infrastructure and biodiversity. Unless a statutory exemption is met, from February 2024 major development will be

⁵² <https://www.greensuffolk.org/flooding/flood-risk-management-strategy/>

⁵³ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

subject to biodiversity net gain requirements. This will be extended to minor developments from April 2024. Where a development proposal is exempt from the mandatory biodiversity net gain requirement, it is still expected that it will deliver ecological enhancements which are appropriate to the site and proportionate to the scale of the development. This could include tree and hedgerow planting, as well as incorporating integrated bird nesting and bat roosting features into buildings.

Impact on groundwater and aquifers

- 6.26 Proposals for new employment uses should include investigative work to ascertain whether the site is situated on an aquifer or a source protection zone. If the proposed site is located on an aquifer or source protection zone, then a preliminary risk assessment will be required. Further information can be found by contacting the Development Management team⁵⁵.

Site remediation

- 6.27 Proposals to re-use an existing employment site should include plans to remove any pollution that relates to previous uses on the site and to make the site safe for its new occupants. In rural areas a common source of pollution is farmland, which can lead to fertilisers and pesticides entering the soil and local waterways. Land contamination surveys may be needed, and this could affect work on site remediation.

Impact on surrounding uses

- 6.28 Economic development can impact upon surrounding properties and other neighbouring land uses. The following are potential sources of nuisance

⁵⁴ <https://www.gov.uk/guidance/flood-risk-and-coastal-change#para55>

⁵⁵ <https://www.eastsuffolk.gov.uk/contact-us/planning-applications-and-planning-enforcement/>



which should be avoided when planning for new economic development, particularly employment uses.

External lighting

- 6.29 Economic development in rural areas throughout the district should be designed so as to minimise light pollution and to protect dark skies. Suffolk Coastal Local Plan policies SCLP10.4 (Landscape Character) and Waveney Local Plan policy WLP8.35 (Landscape Character) all require protection of dark skies as part of the development process. This is particularly important in the National Landscape and in locations where the setting of the Broads may be affected. The Broads Management Plan explains the significance of dark skies and the importance of protecting them.⁵⁶ The Suffolk & Essex Coast & Heaths National Landscape Management Plan 2023-2028, section 4.⁵⁷ sets out that development within the National Landscape should protect dark skies. Neighbourhood Plans may also contain policies about dark skies and should be consulted when planning new development. Businesses located in rural protected landscapes and operating during the evening and nighttime, should seek to minimise light pollution. This is particularly the case for businesses located in or close to the National Landscape or the Broads Authority area, where it is important to protect dark skies. The Coast and Heaths National Landscape has recently prepared a Lighting Design Guide.⁵⁸ which may be used to aid considerations in this respect.
- 6.30 External lighting should be of a design that focuses lighting onto the employment area itself and minimises the amount of light that spills over onto neighbouring properties. This is particularly important in the case of

nearby residential properties. The height and angle of external lighting can also help to minimise the amount of light pollution in surrounding areas.

- 6.31 It is strongly encouraged that proposals that include floodlighting are accompanied by a lux plan demonstrating no adverse light spill onto the landscape and surrounding habitats. All proposals that include external lighting should be thoroughly justified as necessary for the development.

Noise

- 6.32 Economic development, particularly employment development, should be designed and located so as to minimise noise pollution. This is of particular importance on employment sites that are adjacent to residential areas. Site layout can help to ensure that machinery and points of access, which could create issues of noise, are situated as far as possible away from residential areas. Suffolk Coastal Local Plan policy SCLP4.5 (Economic Development in Rural Areas) part e) states that economic development in rural areas should be compatible with neighbouring employment uses in terms of noise. This is also a requirement of Waveney Local Plan policy WLP8.12 (Existing Employment Areas). Reducing impact from noise is particularly important where economic development takes place within the National Landscape or near The Broads. Although this is chiefly an issue for tourism uses there are also employment uses in the National Landscape and near The Broads. The Suffolk & Essex Coasts & Heaths National Landscape Management Plan 2023-2028, section 4 (page 52) includes a requirement for development within the National Landscape to minimise noise pollution.

⁵⁶ <https://www.broads-authority.gov.uk/about-us/how-we-work/strategy/broads-plan-2022>

⁵⁷ <https://coastandheaths-nl.org.uk/managing/management-plan/>

⁵⁸ <https://coastandheaths.org/wp-content/uploads/2023/08/Lighting-Guidance-in-National-Landscapes.pdf>



Odour

- 6.33 Proposals for new economic developments should also minimise issues from dust and odour. Suffolk Coastal Local Plan policy SCLP4.5 (Economic Development in Rural Areas) part e) states that economic development in rural areas should be compatible with neighbouring employment uses in terms of odour. This is also a requirement of Waveney Local Plan policy WLP8.12 (Existing Employment Areas). This can be achieved through sympathetic site layout, which can locate the source odour or dust as far away within a site from other uses as possible. However, economic development sites where noise and odour could become issues should be located as far away as possible from residential areas. New proposals should also be designed so as to minimise dust and maintain air quality.

Hours of operation

- 6.34 Hours of operation are important in ensuring that noise, light, dust and odour are kept to a minimum. They should ensure that economic developments, particularly employment uses, are not in operation at times when they could impact upon neighbouring uses, particularly residential uses.

Additional community, cultural and tourism benefits

- 6.35 Economic development should minimise impact on the surrounding landscape and built historic environment. New economic developments should be located so as to minimise impact on the National Landscape (formerly AONB), The Broads, Heritage Coast and built and historic environment. The Suffolk & Essex Coasts & Heaths National Landscape Management Plan 2023-2028, section 4 (pages 51 and 53) includes a

⁵⁹ <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/First-Draft-Local-Plan/SCDC-Landscape-Character-Assessment.pdf>

requirement for development within the National Landscape to protect the surrounding landscape, with particular mention given to tourism uses. This includes Conservation Areas, listed buildings and non-designated heritage assets, as well as historic parks and gardens. Proposals for economic development should refer to the Landscape Character Assessments^{59 60} for both the former Suffolk Coastal and Waveney areas, which are intended to ensure that new development does not undermine the valued characteristics of the surrounding area.

Access

Junctions

- 6.36 Access to employment sites will vary depending on the scale, type and location of development. Applicants should consult Suffolk County Council Highways team to ensure that the junctions to a new development enable safe access to all users, including heavy goods vehicles, cars, cyclists and pedestrians.
- 6.37 All development proposals in rural areas should ensure that appropriate access is provided for that particular use.

Rural Industrial Estates

- 6.38 Industrial estates in rural areas should be designed to enable access by articulated lorries. Industrial estate roads should have a width of at least 7.3 metres (which should be larger for large industrial estates). Each unit within an industrial estate should provide turning and operational facilities for at least one articulated lorry of 3.5 metres wide by 18.5 metres long. For

⁶⁰ <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/Landscape-Character-Assessment.pdf>



warehousing there should be one space for an articulated lorry per 250 square metres of floor space.

- 6.39 Industrial estate roads should avoid sharp inclines, which would be difficult for large heavy goods vehicles to negotiate. The maximum gradient should be 1 in 12.

Visibility splays

- 6.40 Access points should be served by adequate visibility splays. Visibility splays enable vehicles exiting a business premises to see what traffic is coming. Creating visibility splays can impact upon the surrounding landscape. Provision should be made for hedgerows to be replanted further from the road to enable improved visibility. Suffolk County Highways should be consulted about which type and size of visibility splay is needed for any particular development. Junctions should be designed and located so that hedgerows do not need to be removed.

Pedestrian and cycle access

- 6.41 Although many rural locations are remote the Council will encourage developments there that promote cycling and walking.
- 6.42 Developments should be designed from the outset to encourage non-car forms of transport and to ensure that they are well connected for cyclists and pedestrians. Suffolk Coastal Local Plan policy SCLP7.1 (Sustainable Transport) and Waveney Local Plan policy WLP8.21 (Sustainable Transport) both state that development should promote and provide for sustainable forms of transport. The East Suffolk Cycling and Walking Strategy⁶¹ also

promotes cycling and walking throughout the District, including through the provision of new cycle routes.

- 6.43 Access for cyclists and pedestrians will vary between different developments. It will depend upon the type of development, the size of the site, location of development and existing cyclist and pedestrian infrastructure in the immediate area. For example, cycle and pedestrian access arrangements will be significantly different on a storage and distribution site, which sees significant movement from heavy goods vehicles, from a small café on a farm diversification scheme. Access for cyclists and pedestrians should be negotiated with Suffolk County Council and East Suffolk Council at the same time as highways access for motorised vehicles is agreed.
- 6.44 Significant kerb height will be needed to reduce the risk of lorries mounting the kerb, which can damage cycle paths and pose a significant risk to cyclists and pedestrians. Cycle and pedestrian access should also be separated from the public highway to reduce the risk of heavy goods vehicles straying into cycle and pedestrian lanes. Adequate access for HGVs should be agreed with Suffolk County Highways. This should include turning space and good visibility to ensure that HGV drivers are aware of cyclists and pedestrians.
- 6.45 Industrial estate roads should be designed to ensure the safety of cyclists and pedestrians and to minimise the risk of HGVs entering cycle and pedestrian lanes.

Links to regional and national cycle routes.

⁶¹ <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/east-suffolk-cycling-and-walking-strategy/>



- 6.46 Development should be well linked to the existing cycling and pedestrian network. This includes several important regional and national cycle routes that run through the district.

Cycle and pedestrian crossings (including the use of lights and dropped kerbs)

- 6.47 Cycle and pedestrian crossings are usually located on public roads outside of new developments. Nonetheless, provision of new crossings is encouraged to enable employees and visitors to reach new developments. Designs should be produced in consultation with Suffolk Country Council Highways. The placing of cycle and pedestrian crossings requires careful consideration and should be integral to the design process of access for cyclists and pedestrians. It is important that crossings are placed so that they fit in with desire lines, following the routes that users want to take.

- 6.48 This will ensure that cycle and pedestrian access is safe and convenient for users. Further information can be found on the East Suffolk Cycling and Walking Strategy,⁶² Suffolk Streets Design Guide Website,⁶³ Local Transport Note 1/20,⁶⁴ and Manual for Streets 2.⁶⁵

Pavement and road materials

- 6.49 The materials used in the construction of roads, cycle and pedestrian access routes should be made so that they are durable and easy to maintain. Materials are an important way of signalling to users that they are approaching a junction or a crossing and to be aware of traffic. The colour of

materials used can also delineate cycle and pedestrian routes alongside other measures.

- 6.50 Planting next to roads, cycle and pedestrian routes has numerous benefits. Trees and vegetation provide biodiversity habitat, improve the street scene and can provide shade for cyclists and pedestrians. Furthermore, the planting can create additional separation between vehicles and cyclists and walkers.

- 6.51 Appropriate use of materials helps to ensure that new roads and junctions are in keeping with the surrounding area. The use of gravel, or in some cases bonded gravel can help new road access to be in keeping with the rural character of the surrounding area.

- 6.52 Economic development sites should be accessible on foot or by bike from nearby residential areas.

Access by public transport

- 6.53 East Suffolk Council cannot provide public transport to new developments. However, the Council is supportive of proposals that include public transport provision, particularly on larger sites. Consideration needs to be given to how the site can be accessed by public transport. New bus stops should be designed and located so that they are accessible to new developments, including for disabled users. This includes the provision of pedestrian routes to and from bus stops. Bus stop shelters should be provided where this is feasible. Bus stops should be located so that they do not cause congestion or force other vehicles to overtake in dangerous circumstances. It is

⁶² <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/east-suffolk-cycling-and-walking-strategy/>

⁶³ <https://www.suffolk.gov.uk/asset-library/imported/5647-21-Suffolk-Design-Street-Guide-v26.pdf>

⁶⁴

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/951074/cycle-infrastructure-design-ltn-1-20.pdf

⁶⁵ <https://www.gov.uk/government/publications/manual-for-streets>



important that the design of new bus stops and other public transport provision is agreed with Suffolk County Council Highways. Suffolk Streets Design Guide.⁶⁶ and Manual for Streets.⁶⁷ provides more information.

Parking standards for cars and lorries

- 6.54 Car parking is important because many rural locations are remote and cannot easily be accessed on foot, by bike or by public transport. Therefore, many visitors and employees will continue to drive to economic development sites in rural locations. Travel plans may be relevant to larger developments, because they set out plans for integrating sustainable travel into new proposals.
- 6.55 Suffolk Coastal Local Plan policy SCLP7.2 (Parking Proposals and Standards) sets out what is expected in terms of new parking provision in the former Suffolk Coastal area. While there is no equivalent policy in the former Waveney area the Waveney Local Plan supports the provision of adequate parking, designed to a high standard, in several of its policies.
- 6.56 [Suffolk County Council Guidance for Parking](#) (Fourth Edition, 2023).⁶⁸ provides comprehensive parking provision requirements for different types of development. This includes standards for cycle storage and parking at employment sites.
- 6.57 Car parks should be accessible for all users, including those who are disabled. Access should be designed to enable all users to move between the site and the car park.

⁶⁶ <https://www.suffolk.gov.uk/asset-library/imported/5647-21-Suffolk-Design-Street-Guide-v26.pdf>
⁶⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/341513/pdfmanforstreets.pdf

- 6.58 HGV parking should be based on operational requirements. Adequate provision should be made for the parking and turning of vehicles off the public road. Provision should also be made for overnight parking where necessary.
- 6.59 Car park design should minimise impact on the surrounding landscape. This may require measures such as tree planting and the use of embankments. The use of appropriate surfaces can also help to minimise landscape impact. Examples of surfaces with less visual impact include gravel and bonded gravel.
- 6.60 Car parks should also be designed to minimise flood risk. The use of permeable surfaces can help to absorb rainfall and minimise surface water runoff. Examples of permeable surface materials include gravel, bonded gravel and permeable paving grids. The latter are particularly appropriate for overspill car parks because they minimise landscape impact when the car park is not in use. However, appropriate methods that ensure contaminants from the vehicle parking, particularly HGV's do not enter the watercourse may be required.

Vehicle charging

- 6.61 The provision of electric vehicle charging points is the same for all non-residential developments. There is no difference in requirements between new build and refurbishments of and extensions to existing buildings.
- 6.62 No charging points are required for sites with less than nine parking spaces. For sites with 10 or more parking spaces there should be one charging point.

⁶⁸ <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/parking-guidance>



20% of spaces should have a cable route, to enable connections to charging points in the future. More information can be found in approved document S of the Building Regulations.⁶⁹

Disabled access

- 6.63 Economic development in rural areas should include access for disabled people. This includes disabled drivers, as well as cyclists and pedestrians. Disabled access should be considered at the start of the design process and should be an integral part of any new scheme. Applicants should ensure that their proposals conform with building regulations for disabled access. Applicants should consult Building Control.⁷⁰ to ensure compliance with building regulations for non-residential development. The Draft [Healthy Environments Supplementary Planning Document's](#) Active Travel chapter, includes design guidance on ensuring accessibility and inclusivity for people with reduced mobility.

Design and Landscaping

Design of Buildings

- 6.64 New development should be of a high-quality design. Both Suffolk Coastal Local Plan policy SCLP11.1 (Design Quality) and Waveney Local Plan policy WLP8.29 (Design) state that new development should be of a high-quality design that is sensitive both to its setting and to the wider landscape. Applicants should consult the Design and Heritage Team for further advice.⁷¹
- 6.65 Suffolk Coastal Local Plan policy SCLP11.1 (Design Quality) sets out how new buildings should respond sensitively to their settings and the wider

landscape. In particular, part C states that development should respond to the surrounding buildings and form in terms of the following criteria:

- i. the overall scale and character should clearly demonstrate consideration of the component parts of the buildings and the development as a whole in relation to its surroundings;
- ii. the layout should fit in well with the existing neighbourhood layout and respond to the ways people and vehicles move around both internal and external to existing and proposed buildings;
- iii. the height and massing of developments should be well related to that of their surroundings;
- iv. there should be a clear relationship between buildings and spaces and the wider street scene or townscape; and
- v. high quality materials appropriate to the local context should be used.

- 6.66 Waveney Local Plan policy WLP8.29 (Design) similarly sets out how new development should respond sensitively to its setting and the wider landscape. In particular, new development should respond to local context and the form of surrounding buildings in relation to:

- the overall scale and character
- layout
- site coverage
- height and massing of existing buildings
- the relationship between buildings and spaces and the wider street scene or townscape

⁶⁹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1057375/AD_S.pdf

⁷⁰ <https://www.eastsuffolk.gov.uk/planning/building-control/>

⁷¹ <https://www.eastsuffolk.gov.uk/planning/design-heritage-ecology-trees-landscape-and-rights-of-way/>



- and by making use of materials and detailing appropriate to the local vernacular.

Scale of development

6.67 Development should be of an appropriate scale to its surroundings. New buildings should not overshadow other buildings in the surrounding area. New development should be of an appropriate scale when compared to the existing settlement. Economic development in rural areas will tend to be small in scale as a result. Large scale economic developments are likely to more appropriately come forward on allocated sites within larger settlements or towns.

Use of existing buildings

6.68 Subject to policy, proposals for new economic development provides an opportunity to reuse existing buildings, particularly ones that are vacant. Further guidance on the conversion of rural buildings can be found in chapter 5.

Extensions

6.69 Rural buildings can be repurposed for employment uses. The original building should be used to accommodate a new business development. However, if this is not possible the building may be extended to accommodate a new business use. The extension should be in keeping with the size and scale of the original buildings. The extension should not be larger than the original building. Extensions should also use the same design and materials as the original building. Chapter 5 Rural Buildings and Barn

Conversions provides more information about extensions. More guidance about extensions to historic buildings can be found in the Historic Environment SPD.⁷²

Landscape impact

6.70 Development for new business uses should minimise landscape impact. Where possible new businesses should be located within existing buildings. New buildings should be located close or next to existing buildings. The development of single buildings in isolated locations should be avoided. Buildings should be designed so as to minimise landscape impact. Developers should consider using low rise structures, which are less visible in the landscape. Retention of trees and hedgerows will also help to minimise landscape impact. Tree planting and earth bunds can also be used in instances where there is little or no existing vegetation. These measures will also help to protect and preserve wildlife habitat.

⁷² <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Historic-Environment-SPD/Historic-Environment-SPD-reduced.pdf>



Buildings at Otley College blend into the landscape

National Landscape, heritage coast and the Broads

6.71 Landscape impact is particularly important within the National Landscape and Heritage Coast and the setting of The Broads. The Suffolk & Essex Coasts & Heaths National Landscape Management Plan provides more information and guidance.

Setting of Heritage Assets

6.72 Listed buildings have been designated by the Government because they are of special historic and architectural interest. Listed buildings receive statutory protection. Non-designated heritage assets are not of sufficient value to be nationally listed but are nonetheless of local interest. Development should respect the appearance and character of Listed and non-designated heritage assets. This includes protecting the materials and

architectural features that make Listed and non-designated heritage assets unique.

6.73 The Suffolk Coastal Local Plan guides development in the former Suffolk Coastal area. The following policies provide guidance about Listed buildings and non-designated heritage assets.

- SCLP11.4: Listed Buildings
- SCLP11.6: Non-Designated Heritage Assets

6.74 The Waveney Local Plan guides development in the former Waveney area. Policy WLP8.38 (Non-Designated Heritage Assets) provides guidance about non-designated heritage assets. Policy WLP8.37 (Historic Environment) also provides policy direction.

6.75 Conservation areas receive enhanced protection in the planning system because they are of special architectural or historic interest. Certain types of permitted development right have also been withdrawn in some conservation areas, under arrangements known as [Article 4 Directions](#). Most conservation areas are located within the centres of towns and villages, but some also include rural areas.

6.76 Suffolk Coastal Local Plan policy SCLP11.5 (Conservation Areas)⁷³ provides guidance about development in conservation areas. Waveney Local Plan policy WLP8.39 (Conservation areas) provides guidance about development in conservation areas⁷⁴. Further guidance about development in

⁷³ <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Suffolk-Coastal-Local-Plan/Adopted-Suffolk-Coastal-Local-Plan/East-Suffolk-Council-Suffolk-Coastal-Local-Plan.pdf>

⁷⁴ <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Adopted-Waveney-Local-Plan-including-Erratum.pdf>



conservation areas can be found on the design and conservation section of the Council's website.⁷⁵

- 6.77 More information about listed buildings and conservation areas can be found in the Historic Environment Supplementary Planning Document.⁷⁶

Well-related to existing buildings and settlements

- 6.78 It is not always possible to reuse existing buildings for a new business development and sometimes new buildings are necessary. New buildings should be well related to existing buildings and not detract from their character and appearance. Isolated buildings that are not related to any existing farm or settlement can detract from the character of the landscape and so should be avoided.
- 6.79 The use of materials that are in keeping with those used in existing buildings can help new developments to successfully blend in with their surroundings. A colour palette, which is similar to those used on existing buildings can also help to reduce the visual impact of new development.

Locate car parking so as to minimise landscape impact

- 6.80 Car parking is important for rural businesses, particularly where public transport provision is scarce. However, car parks can have significant impact on the appearance of buildings and the wider townscape. The location and design of car parks should therefore be treated with care. This is particularly important where a car park is in the setting of a listed building, a

conservation area or a protected landscape, such as a National Landscape, Heritage Coast or the setting of The Broads.

- 6.81 Car parks should be located where they will have the least impact on the setting of a building or wider landscape. Existing trees and hedges should be retained to reduce landscape impact and protect views of buildings and settlements. Additional tree and hedge planting can help to reduce landscape impact, as can earth bunds or embankments.

Water and energy efficiency

- 6.82 New buildings should be designed to high standards of water and energy efficiency in accordance with policies WLP8.28 Sustainable Construction and SCLP9.2 Sustainable Construction. Further guidance about energy can be found in the Sustainable Construction SPD.⁷⁷

Advertising

- 6.83 Advertisements are an important way of attracting customers to a business, but they can also have a negative impact on the surrounding area. Advertisements should be designed and located to attract people's attention, but not to impact upon the surrounding area. Advertising should be considered carefully at the start of the development process. This is particularly important in a designated landscape such as the National Landscape, conservation areas and the setting of The Broads. A large number of signs in different locations will not generally be supported.

⁷⁵ <https://www.eastsuffolk.gov.uk/planning/design-conservation-ecology-trees-landscape-and-rights-of-way/conservation/conservation-areas/>

⁷⁶ <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Historic-Environment-SPD/Historic-Environment-SPD-reduced.pdf>

⁷⁷ <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Sustainable-Construction-2022/FINAL-Sustainable-Construction-SPD.pdf>



- 6.84 The design of advertising placed on buildings should use design, colours and materials that are in keeping with the building. This is of particular importance with advertising placed on or next to listed buildings. Listed building consent may be required, and it is important to consult a member of the Design and Heritage team if in any doubt. Illuminated signage can impact upon the appearance of an area and cause a nuisance at nighttime. It should therefore generally be avoided.
- 6.85 Signage should be no larger than is necessary. Several small signs can sometimes create a cluttered or untidy appearance and a single larger sign that includes several businesses may be preferable, provided that it does not impact upon the appearance of a building or landscape. Signage should only be placed on the business premises itself, not on nearby roads.
- 6.86 A-boards are often placed on pavements or roadside verges. Again, there is the danger that they can create a cluttered appearance. A-boards placed on pavements also have the potential to impede the movement of pedestrians. A-boards placed on pavements will usually require permission from Suffolk County Council Highway Authority, as well as express advertising consent.
- 6.87 More information about advertising can be found in the [Planning Practice Guidance](#) on advertisements.⁷⁸
- 6.88 The [Planning Portal website](#)⁷⁹ also provides information about what types of advertising are acceptable.

Factories and Workshops

- 6.89 East Suffolk does not have many factories and workshops located outside of the Existing Employment Areas. Most factories are located in existing

industrial and employment areas that are in or adjacent to the towns, such as the Birds Eye factory in Lowestoft.

- 6.90 St Peter's Brewery near the village of Ilketshall St. Margaret to the south of Bungay is an example of a successful factory in a rural location. In addition to manufacturing the product, the brewery has diversified and offers tours and hosts events.



St Peter's Brewery, Ilketshall St Margaret

- 6.91 The Suffolk Coastal Local Plan policy SCLP4.2 (New Employment Development) permits new employment development to provide a greater choice and economic opportunities. New employment uses outside of allocated employment land, Existing Employment Areas and Settlement Boundaries is only supported by the policy where a need has been demonstrated and there is no preferable land available adjacent to an Employment Area, within an Employment Area or within a Settlement

⁷⁸ <https://www.gov.uk/guidance/advertisements>

⁷⁹ <https://interactive.planningportal.co.uk/terraced-house>



Boundary. Policy SCLP4.3 Expansion and Intensification of Employment Sites permits existing sites to expand subject to criteria in the policy.

- 6.92 The Waveney Local Plan policy WLP8.13 (New Employment Development) permits development within Existing Employment Areas, outside of Existing Employment Areas but within Settlement Boundaries, and adjacent to Existing Employment areas but outside of Settlement Boundaries.



2 Sister's Food Group Factory, Bungay

- 6.93 Factories and large workshops aren't common features in the countryside. Factories and workshops usually comprise of one or more large scale buildings and are surrounded by large areas of concrete/hardstanding to accommodate staff parking, delivery lorries/HGVs and possibly the storage of goods and materials on pallets.
- 6.94 The rural transport networks may not be able to handle the size and volume of additional vehicles associated with a successful factory business. Access to public transport in rural areas, if in existence, is usually limited and therefore unable to offer a meaningful alternative to the private car.

Development must demonstrate that the surrounding transport network can accommodate the traffic that will be generated by the proposal.

- 6.95 The size, scale and number of buildings can have a significant visual impact on the character of the landscape, historic environment and natural environment. The location should be carefully chosen, and the design and layout of a proposed development should be of a high quality to minimize the negative impacts.
- 6.96 The development should be designed to a high quality to minimise the negative impacts on the character of the landscape, any nearby heritage assets and the natural environment. Any proposal for a factory or workshop in a rural area should also have regard for how noise, odour, vibrations, dust and artificial light will impact neighbouring residential amenity.

Development of Former Airfields

- 6.97 East Suffolk has a number of airfields, most of which are former World War I, World War II and Cold War airfields. The airfields are a feature of the East Suffolk and East Anglian countryside, a part of the history of the local area and a reminder of the role that East Suffolk played in the World Wars.
- 6.98 In addition to runways and taxi-ways, the airfields originally had a variety of buildings including control towers, aircraft hangers, bomb/ammunition stores, offices, gymnasium, dining rooms, stores and officer mess.
- 6.99 A lot of airfields have fallen into disrepair with crumbling runways that have been partially or entirely been dug up and removed. Some buildings have been demolished, others are in disrepair or have been converted to other uses, such as agricultural stores or industrial uses. Most of the land surrounding the former airfields have returned to agricultural use. Bungay (Flixton) airfield is a former USAAF WWII base that was constructed in the



early 1940s. It has fallen into disrepair and most of the buildings were demolished. The remaining buildings are vacant or used as agricultural stores. Parham (Framlingham) Airfield is also a former USAAF WWII base that was also constructed in the early 1940s and was occupied by 3,000 personnel who lived in Nissen huts. Today the Control Tower and some huts remain as a museum.



Parham airfield control tower and surrounding buildings

6.100 A few airfields continue to operate as small private airfields offering flying lessons, parachuting, and helicopter rides. Beccles airfield was constructed in the early 1940s by the USAAF. Today the aerodrome provides flying lessons, parachuting and services and facilities for the Gas off-shore industry. Part of Beccles’ original runway, two hangars and several buildings remain.⁸⁰. The site has developed with three new aircraft hangars, café, places to stay and significant parts of the site converted to an industrial estate.



Hangar at Beccles airfield

6.101 Some airfields have previously provided suitable opportunities for redevelopment to provide housing, employment and industrial uses. RAF Martlesham Heath airfield was created in 1917. The airfield and surrounding agricultural land later became Adastral Park, a business park that is home to British Telecom (BT) and other telecommunication companies.

6.102 The Suffolk Coastal Local Plan identifies several former airfields as Existing Employment Areas. These site allocations have an important role to play in the provision of employment land and creation of jobs, including through development on land that remains vacant. The sites are:

- Policy SCLP12.35 allocates 10.89 hectares of land at the former Debach airfield. The site contains existing employments use within Use Classes B1, B2 and B8. The site is allocated for new employment provision through the re-development or refurbishment of existing buildings, subject to criteria set out in the policy.

⁸⁰ <http://www.becclesaerodrome.co.uk/history-1>



- Two sites at the former airfield at Parham have been allocated for employment use. Policy SCLP12.38 allocates 2.4 hectares of land at Silverlace Green, Parham for employment use. The site contains existing B1 and B2 uses with new employment, including re-development or refurbishment of existing buildings permitted subject to criteria in the policy.
 - Policy SCLP12.39 allocates 5.72 hectares at the former Parham airfield. The site contains existing B1 and B2 uses with new employment, including re-development or refurbishment of existing buildings permitted subject to criteria in the policy.
 - Policy SCLP12.40 allocates 390 hectares of land at the former airfield at Bentwaters. The site contains over 300 buildings and structures as well as extensive areas of grass and employs over 400 people. New employment uses are permitted subject to criteria in the policy.
- 6.103 Key issues that need to be addressed in planning applications for all employment uses on former airfields are traffic, land contamination, sewerage facilities, flood risk and drainage. Some sites may also need to consider how to mitigate the impact of development on the character of the wider area. Some former airfields have longstanding commercial uses and so these issues may already have been resolved. This will depend on the nature of the proposal and in some cases work to address these issues will be needed on an established site. For example, if a proposal results in significantly higher traffic movements.
- 6.104 Traffic will increase and impact the local highway network. In accordance with site allocations policies and policy SCLP7.1 Sustainable Transport, planning applications should demonstrate that the proposal is acceptable to the Highway Authority. This will include a transport statement or transport assessment where necessary.
- 6.105 Some sites that are only just being converted to employment may be contaminated from previous uses. Subject to planning policy requirements, evidence of investigations will be necessary for developments on former airfield sites.
- 6.106 Developments should ensure there are adequate sewerage facilities. The developer should liaise with Anglian Water during the early stages of the design process. A new sewage treatment plant may be necessary and should be considered early in the design of the development. A Flood Risk Assessment is required for all development sites that are at risk of flooding from any source. Drainage is also subject to criteria in the site allocation policies and to policies SCLP9.6 Sustainable Drainage Systems and SCLP9.7 Holistic Waste Management. Many of these issues may already have been resolved where there are longstanding and well-established employment uses. As stated previously, this will depend on the nature of the proposal.
- 6.107 The impact of proposals for new conversions to employment use on the character of the surrounding, predominately rural landscape should be considered and where possible any negative impacts should be minimised with screening and boundary treatments.
- 6.108 Some airfields retain original, historically important buildings such as control towers and Nissen huts. In some cases, such as at Parham these buildings have been preserved and converted into museums. The design of development proposals should have regard for the site's locally distinctive character, demonstrate an understanding of the built, historic and natural environment and seek to complement the local character. Any planning application for the conversion of an historic building should be accompanied



by a Heritage Statement. Applicants seeking information on the history of a building should refer to the Suffolk Historic Environment Record.⁸¹

Storage and Distribution

- 6.109 Storage and distribution depots are an important part of modern business logistics and play an important role in moving goods around the country in a cost effective and timely manner. However, storage and distribution depots can have a significant negative impact on surrounding landscapes and result in heavy goods vehicle (HGV) movements.
- 6.110 Storage and distribution facilities often take the form of large warehouses. These should ideally be located on or close to the major road network. This is to avoid congestion on minor roads and residential streets. Location on or next to the major road network will also enable quicker journey times for HGVs.
- 6.111 The large warehouses that are often part of storage and distribution facilities have an increased height and massing when compared to other employment related uses. This can result in significant landscape impact, which is an important consideration in rural areas, particularly in protected landscapes such as the Suffolk & Essex Coast & Heaths National Landscape.
- 6.112 Location of storage and distribution facilities next to existing buildings can minimise landscape impact. The retention of existing vegetation can help to protect biodiversity habitats and reduce the impact of new warehouses on the surrounding landscape. Tree and hedge planting schemes, together with embankments that raise the height of new vegetation, can also help to reduce landscape impact.

⁸¹ <https://www.suffolk.gov.uk/culture-heritage-and-leisure/suffolk-archaeological-service/the-historic-environment-record>

- 6.113 Nonetheless, the size of storage and distribution facilities means that careful attention must be paid to their design to ensure that impact upon the surrounding area is kept to a minimum. This includes constructing buildings that are of a height and scale that does not dominate the surrounding landscape or overshadow nearby buildings. In particular, care must be taken to ensure that storage and distribution facilities do not impact on the setting of historic buildings or conservation areas.
- 6.114 The use of appropriate materials and colours can help to minimise landscape impact and to ensure that the settings of surrounding uses and buildings are not adversely affected.
- 6.115 Car parking should be provided in line with guidance provided earlier in the chapter. There should also be adequate space provided for the parking, turning and onloading and offloading of HGVs. Each of these activities should take place off the public road. Safe access and exit points for HGVs and cars must be provided, including the provision of adequate visibility splays.
- 6.116 Safe access for cyclists and pedestrians should also be provided. Cycle and pedestrian access should ideally be separate from road access and should enable employees to access the site from nearby residential areas.
- 6.117 More information about planning applications for new storage and distribution facilities can be found on Planning Portal.⁸²

⁸² <https://www.planningportal.co.uk/permission/common-projects/warehouses-and-industrial-buildings/planning-permission>



6.118 More information about cycling and walking provision requirements can be found in the East Suffolk Cycling and Walking Strategy⁸³.

Farm Diversification

6.119 Farming in the United Kingdom is experiencing a period of considerable change. Falling agricultural incomes have led many farmers to explore alternative sources of income. One way of doing this is to convert some of the farm buildings to non-agricultural uses. Examples of these include offices, workshops, storage spaces and holiday lets.

6.120 Suffolk Coastal Local Plan policy SCLP4.7 (Farm Diversification) provides policy guidance about farm diversification proposals in the former Suffolk Coastal area. Suffolk Coastal Local Plan policy SCLP4.6 (Conversion of Rural Buildings for Employment Use) provides policy guidance about the conversion of rural buildings for employment use.

6.121 The Waveney Local Plan, which covers the former Waveney area, does not contain any policies about farm diversification. However, Waveney Local Plan policy WLP8.14 (Conversion and Replacement of Rural Buildings for Employment Use) does provide guidance about the conversion of rural buildings for employment use.

6.122 Farm diversification should be ancillary to the main agricultural business. The purpose of farm diversification is to support the farm as an agricultural business. Diversification schemes that result in all or most of the farm being converted to a non-agricultural use will not be supported. Diversification schemes should not include the conversion of agricultural dwellings into permanent residential use. The management of large estates can include a

number of different activities, including farming. However, it is important that the farming element is protected alongside other uses. The Council is supportive of diversification schemes but does not want these to be at the expense of the original agricultural business.



The Milk Shed at Fen Farm Dairy, Bungay

6.123 Diversification schemes should retain and protect existing jobs, as well as creating new ones. There are many types of diversification. The Council will consider proposals for different types of diversification schemes on their merits. Some of the most common types of diversification are considered later in this chapter.

6.124 Farm diversification schemes should retain the character of the farm and rural character of the area. Any new build or extensions to individual

⁸³ <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/east-suffolk-cycling-and-walking-strategy/>



buildings should be subservient in size and scale to the existing building and respect the rural character of the setting and wider landscape.

- 6.125 The use of rooflights should also be avoided because this can alter the appearance of a historic barn or other agricultural building. Existing windows and doorways should also be retained, and their removal will only be supported in exceptional circumstances. Further guidance about rooflights, doors and windows can be found in the Historic Environment Supplementary Planning Document⁸⁴ and chapter 5 in the Rural Residential Curtilage Expansion section.
- 6.126 New buildings and extensions to existing buildings should be in keeping with the existing farm and outbuildings. New buildings and extensions should be made from appropriate materials that are in keeping with the rest of the farm. They should also be no larger than the existing farm buildings and should not overshadow them. This is particularly important in the case of listed farm buildings or buildings that are located in conservation areas. Diversification schemes involving new buildings should also not impact upon the surrounding landscape, especially where a development is located in the Suffolk & Essex Coast & Heaths National Landscape or in the setting of The Broads.
- 6.127 A farm diversification business can result in the need for additional car parking, for both visitors and staff. Suffolk Coastal Local Plan policy SCLP7.2 (Parking Proposals and Standards) provides guidance about car parking provision. Car parking has the potential to have a significant impact on the setting of historic farm buildings and the surrounding area. Car parking should be located where it causes the least visual impact. The use of surfaces

such as gravel and some types of bonded gravel have the advantage of being permeable and also less obtrusive in the landscape. The retention of existing trees and vegetation can also help to shield the appearance of additional car parking. Embankments and additional tree and hedge planting can be considered in some cases to help minimise landscape impact.



Offices at Fen Farm Diary, Bungay

- 6.128 Safe road access will also be necessary for both staff and visitors. This should include adequate visibility for those accessing and exiting the site. Suffolk County Council Highways team should be consulted about highways access and each scheme will have to be decided on a case-by-case basis. Farm diversification schemes should be well connected to the strategic road network, but not increase congestion or impact upon highway safety.
- 6.129 Some farm diversification businesses can require signage for advertising. This will require careful consideration, particularly if the farm is a listed building or is located in a conservation area. Signage should be no larger than

⁸⁴ <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Historic-Environment-SPD/Historic-Environment-SPD-reduced.pdf>



is necessary and should be designed and located so as to minimise the impact on the appearance of the building. This includes through the use of appropriate lettering, colours and materials.

- 6.130 Diversification schemes should not create a conflict with surrounding uses. Examples of this can include noise, odour and excessive traffic movements. Diversification schemes should also protect and enhance the surrounding natural environment.
- 6.131 Lighting should only be used where necessary to ensure that the farm diversification business can be accessed safely by visitors and staff. The installation of lighting should not result in light pollution of the surrounding area or harm to the appearance of the farm and its historic setting. This means that the lights used should be unobtrusive in their design. The lighting itself should be directional so that it directs light solely towards the intended area.
- 6.132 More information can be found in the Design and Heritage section of the Council's website⁸⁵.
- 6.133 Historic farm buildings can be a valuable habitat for protected species. Buildings should be searched for the presence of protected species. Any search should take place outside of the main nesting season. The results of any search should be included with a planning application or should form part of the conditions attached to a planning permission. Searches should take place prior to commencement.

Agricultural Diversification Statement

⁸⁵ <https://www.eastsuffolk.gov.uk/planning/design-heritage-ecology-trees-landscape-and-rights-of-way/heritage/conservation-areas/article-4-directions/>

6.134 It is recommended that farm diversification programmes include an agricultural diversification statement. This explains how proposals comply with the National Planning Policy Framework, paragraph 88, as well as local plan and neighbourhood plan policies.

6.135 The statement should:

- Explain how the proposal maintains the viability of the farm and how it links to other business plans for the farm.
- How the use and scale of the proposal relates to the setting of the farm and to predominant agricultural activities on the farm.
- Demonstrate how the proposal will contribute to the viability of the farm as a whole.
- How the proposal would create employment for the local community and jobs more generally.
- How the conversion of existing buildings will be undertaken sympathetically to the character of the farm.
- For farm shops, identify the products produced on site or locally sourced.
- For the former Suffolk Coastal area, explain how the proposal accords with Suffolk Local Plan policy SCLP4.7 (Farm Diversification) in all other respects.

6.136 This statement could form part of a planning statement.

6.137 More information about the information requirements as part of a farm diversification application can be found in the Council's Local Validation Requirements.⁸⁶

⁸⁶ <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Applications/Local-Validation-Requirements.pdf>



Dog Paddocks/parks

6.138 Dog ownership has risen in popularity in recent years and landowners are offering dog paddocks where owners can let their dogs roam off the lead in a secure, enclosed field. This form of development offers a way for farms to diversify their businesses. Planning permission may be required to convert agricultural land to a dog paddock.



The Dog Orchard, Grundisburgh (Source: The Dog Orchard)

6.139 The Local Plan policies relevant to the change of use of agricultural land to a dog paddock are:

- SCLP4.7 Farm Diversification
- SCLP7.1 Sustainable Transport, SCLP7.2 Parking Proposal and Standards, and WLP8.21 Sustainable Transport
- SCLP10.1 Biodiversity and Geodiversity and WLP8.35 Biodiversity and Geodiversity

- SCLP10.3 Environmental Quality, SCLP10.4 Landscape Character and WLP8.36 Landscape Character

6.140 The key planning considerations are:

- Vehicle access. The fields may have no access or a simple farm access. New or improved vehicle access will be required for visitors/customers together with appropriate visibility splays.
- Onsite parking. Villages and country roads in East Suffolk are usually narrow, single lane roads with passing bays. On street parking is unlikely to be appropriate for the development. Developments should provide an area of hardstanding to accommodate parking for a few vehicles and a turning area.
- Bins for waste. Bins should be provided for dog owners to enable responsible disposal of waste.
- Signage. The site may require signage on or near the site entrance. The size and scale of the signs should be proportionate to the modest scale of the development. The number of signs should be kept to the absolute minimum needed, and where possible be a single sign.
- Boundary treatments. Dog paddocks on the edge of villages, farmsteads or in the open countryside should retain the site's original rural, agricultural character. Close boarded fencing gives sites a suburban character and tall metal fencing can appear industrial. Agricultural sites typically have trees, hedges, post and rail fencing and chicken wire fencing, and a combination can be appropriate for a dog paddock.
- Shelters. Some dog paddocks offer shelters for the dog owners. They are usually small shed-like timber structures which are open on one side.



The size and scale should be modest and appropriate for their use. They should also be located on the edge of the field to minimize their impact on the character of the open space.

Farm shops and cafés

Common issues

- 6.141 Many farm diversification schemes have included shops and cafés. These have the benefits of serving as an outlet for farm products, generating additional income, providing employment and attracting visitors to the locality. Some farms have also developed garden centres on their land.
- 6.142 Suffolk Coastal Local Plan policy SCLP4.7 (Farm Diversification) supports the development of farm shops where they support the continuation of the farm business, provide local employment and sell products that are related to the farm and the local area. They should also not undermine existing facilities in nearby towns and villages.
- 6.143 Farm owners planning cafés and shops should consider the need to create adequate car parking, which includes safe access onto the road network. Café and retail schemes should also not contribute to issues of road congestion. Where necessary businesses should also provide access and parking for HGVs.
- 6.144 Where possible cafés and farm shops should be accommodated within existing buildings. Historic buildings should be converted so as to protect any architecturally or historically significant features. However, extensions to existing buildings or the creation of new buildings may be necessary in some cases. This could include a new seating area for a café or additional accommodation for a garden centre. Proposals for new buildings should be

in keeping with existing buildings and should not impact upon the setting of the farm or the wider landscape.

- 6.145 Policy SCLP4.7 states that farm shops should sell produce that is associated with the farm or the surrounding area. Farm shops should not be detrimental to existing shops and facilities in nearby towns and villages.



Bugs Play Café, Bungay

- 6.146 Shops and in particular cafés are subject to conditions that limit opening hours. These are decided on a case-by-case basis as part of a planning application following discussion with the Council's Environmental Health team. This is to minimise impact of noise and traffic on nearby residents. Café owners should also ensure that odour issues from the kitchens are minimised. This can include ensuring that the kitchen is located away from nearby houses.



6.147 Some cafés have ventilations systems that serve both the dining areas and kitchens. Cafés that serve cooked meals will also have a separate extraction system for their kitchen. Planning permission will be needed for both ventilation and extraction systems. Ventilation and extraction systems can also cause issues of noise and odour for nearby residents. Extraction and ventilation systems should be located so as to minimise issues of noise and odour for nearby residents. Issues of nuisance can be minimised by restricting opening hours as part of any planning condition.

6.148 Cafés also use refrigeration for food storage, which need to be kept running continuously. These should be located so as to minimise issues of noise for nearby houses.



Bugs Play café, Bungay

Leisure activities

6.149 There has been a long association of certain leisure activities in rural areas utilising agricultural land and/or bodies of water. Practices like shooting, fishing and some forms of pick-your-own activities have long histories. More recently other types of leisure activities have been undertaken on agricultural land such as mazes and sports activities. This form of development has allowed farms to diversify their land and provide additional revenue possibilities.

6.150 Some activities can be undertaken without significant loss of the agricultural production whilst other activities may require the field to stop being used for its primary purpose for a period of time. It is important to note that permission is not always required. Where the activity is allowed under the general permitted development order or where a change of use/development has not occurred, permission may not be required so it is recommended you contact the planning service for advice prior to undertaking any leisure activity.

6.151 The Local Plan policies relevant to the change of use of agricultural land to a leisure activity are:

- SCLP4.7: Farm Diversification
- SCLP6.1: Tourism, SCLP6.2: Tourism Destinations, SCLP6.3: Tourism Development within the AONB and Heritage Coast, SCLP6.4: Tourism Development outside of the AONB
- SCLP7.1: Sustainable Transport, SCLP7.2: Parking Proposal and Standards, and WLP8.21: Sustainable Transport



- SCLP10.1: Biodiversity and Geodiversity and WLP8.35: Biodiversity and Geodiversity
- SCLP10.3: Environmental Quality, SCLP10.4: Landscape Character and WLP8.36: Landscape Character
- SCLP11.1: Design Quality, SCLP11.2: Residential Amenity, Policy SCLP11.3: Historic Environment, and WLP8.29: Design, WLP8.37: Historic Environment.

6.152 The key planning considerations are:

- Vehicle access. The fields may have no access or a simple farm access. New or improved vehicle access may be required for visitors/customers together with appropriate visibility splays.
- Onsite parking. Villages and country roads in East Suffolk are usually narrow, single lane roads with passing bays. On street parking is unlikely to be appropriate for the development. Developments should provide an area to accommodate parking for a few vehicles and a turning area.
- Signage. The site may want signage on or near the site entrance. The size and scale of the signs should be proportionate to the scale of the development. The number of signs should be kept to the absolute minimum needed, and where possible be a single sign.
- Noise and Disturbance. Many activities will exceed the noise levels created by the existing agricultural fields and will be more noticeable owing to the usually quiet environment. In more open areas the noise could travel further, impacting neighbouring properties and changing the character of the area. Noise making

activities should be minimised with sufficient distance created to boundaries with residential properties. Operation times should be controlled where a disturbance is more likely.

- Structures. New permanent structures should be avoided as should large structures which will have an adverse impact on its surroundings. The number of structures should be kept to the minimum required to meet the needs of the leisure activity. All structures should look to be in keeping with the agricultural environment. Use of existing structures should be considered where possible, particularly if it helps the retention of structures which have a positive impact on the character of the area.
- Retaining Agricultural Purpose. In many cases the field will return to agricultural use for the majority of the year so development which restricts or prohibits use of the land for its original agricultural purpose for the remainder of the year should be avoided.
- Heritage. Some activities may not be appropriate where they impact the setting of important heritage assets.
- Historic field patterns. Landscaping and original field patterns should be retained and enhanced as much as possible.

6.153 The General Permitted Development Order 2015 (as amended) outlines permitted development opportunities for temporary land uses. The legislation (as of update upon latest revision) is shown below.



Permitted development

2.1 B. The use of any land for any purpose for not more than 28 days in total in any calendar year, of which not more than 14 days in total may be for the purposes of—

(a) the holding of a market;

(b) motor car and motorcycle racing including trials of speed, and practising for these activities,

and the provision on the land of any moveable structure for the purposes of the permitted use.

Development not permitted

B.1 Development is not permitted by Class B if—

(b) the land in question is a building or is within the curtilage of a building;

(c) the use of the land is for the siting of any caravan except a caravan which—

(i) is a motor vehicle designed or adapted for human habitation; and

(ii) is sited on the land in connection with a festival;]

(d) the land is, or is within, a site of special scientific interest and the use of the land is for—

(i) motor car and motorcycle racing including trials of speed or other motor sports, and practising for these activities;

(ii) clay pigeon shooting; or

(iii) any war game

(e) the use of the land is for the display of an advertisement; or

(f) the use of land is for camping, except when in connection with a festival.



7 Equestrian Development

- 7.1 In rural areas, equestrian activities, particularly horse-riding, are a popular and enjoyable form of recreation. They often accompany farming activities in the rural environment and offer opportunities to diversify the local economy. Equestrian development can often comprise a range of facilities, including stables, paddocks, field shelters, manèges, and indoor arenas.
- 7.2 However, depending on size and location, equestrian development has the potential to effect the rural setting and biodiversity, as well as the historic character of the area. As some areas within East Suffolk reside within the Broads Authority or within the Suffolk & Essex Coast & Heaths National Landscape, it is particularly vital that negative effects of development are mitigated appropriately.
- 7.3 This chapter provides guidance on when planning permission is required and how to appropriately mitigate potential issues associated with equestrian development.

Policy

- 7.4 These are the most relevant policies applicable to equestrian development:

Suffolk Coastal Local Plan policies:

- [Policy SCLP6.1: Tourism](#)
- [Policy SCLP6.2: Tourism Destinations](#)
- [Policy SCLP6.3: Tourism Development within the AONB and Heritage Coast](#)
- [Policy SCLP6.4: Tourism Development outside the AONB](#)
- [Policy SCLP10.1: Biodiversity and Geodiversity](#)
- [Policy SCLP10.4: Landscape Character](#)

- [Policy SCLP11.1: Design Quality](#)

Waveney Local Plan policies:

- [Policy WLP8.29: Design](#)
- [Policy WLP8.34: Biodiversity and Geodiversity](#)
- Policy [WLP8.35: Landscape Character](#)

Is planning permission required?

Land Use

- 7.5 As a rule, equestrian development is not covered by agricultural permitted development rights, therefore development for the keeping of horses on land will ordinarily require planning permission. However, in some cases a change of use of land might not be required, for example using horses for agricultural purposes such as land management.
- 7.6 Examples of situations where a 'change of use' may not be necessary include:
- Keeping working horses for agricultural purposes e.g., horses for ploughing.
 - Keeping horses on the land for grazing only without the need to exercise them or supplement their food.
- 7.7 Examples of situations where a 'change of use' may be necessary include:
- Keeping and exercising sports horses for business use. This can include racing horses, dressage, eventing, etc.
 - Keeping and exercising horses for recreational purposes. This can include riding schools or just personal recreation.
 - Breeding horses for commercial purposes.



- 7.8 Horses may also be kept and exercised within residential curtilages for the purpose of domestic recreation use only.
- 7.9 The storage and use of jumps, dressage markers and other recreational and equestrian exercise paraphernalia on an agricultural land used for grazing would amount to a change of use to an equestrian use.

Permitted Equestrian Development

Field Shelters

- 7.10 Field shelters are a common type of equestrian structure designed to provide shelter for horses and other grazing animals; alternatively, they can be used to store hay and feeding. However, whether they can be considered permitted development or not can be complex.
- 7.11 Some field shelters can be placed on land without the need for planning permission.⁸⁷ given they are moveable structures and not ‘buildings’. In order to be considered a moveable structure, the shelter must be constructed on runners or skids for towing to different locations around the field and should not have a permanent fixed base. The majority of such shelters are sold in a form which is promoted as not needing planning permission but it is advisable to seek pre-application permitted development advice before introducing such structures. If land has previously been granted planning permission for a change of use to equestrian use, then it is possible that permitted development rights were removed and restrictions were imposed in a condition, meaning such shelters would require planning permission.

⁸⁷ <https://www.legislation.gov.uk/uksi/2015/596/schedule/2/part/4/crossheading/class-a-temporary-buildings-and-structures/made>

Stables

- 7.12 In the case that horses are kept for domestic recreational purposes within a dwelling curtilage, stables can potentially be erected under Class E of the General Permitted Development Order subject to meeting criteria within the legislation. However, the majority of the time, stables and associated land fall outside of the domestic curtilage of the dwelling and such permitted development rights would not extend to the proposed location.

Manèges and fencing

- 7.13 Manèges often accompany other equestrian development and are designed for the purpose of training both animals and riders. As riding arenas, such equestrian development can vary in size and are designed to create an enclosed space for riding. Generally, if the dressage arena has been built and designed to include an engineered level surface, fencing with kickboards, and flood lighting, it cannot be erected under permitted development. However, if the structure comprises of low temporary fencing and a grass field surface, it is possible that it may be erected under permitted development. Given safe and secure fencing of paddocks is an essential element of equestrian use, it is important that fencing is considered carefully from the outset. Typical fencing for paddocks comprises of post and rail timber fencing and Part 2 Class A permits fencing up to 1 metre high adjacent to the highway and 2 metres high elsewhere. Therefore, in most locations fencing would not require planning permission. Attention should be given to planting native hedgerow outside of fence lines, allowing a robust natural boundary to form over time. Temporary electric fencing, often used to sub-divide paddocks does not usually require planning permission.

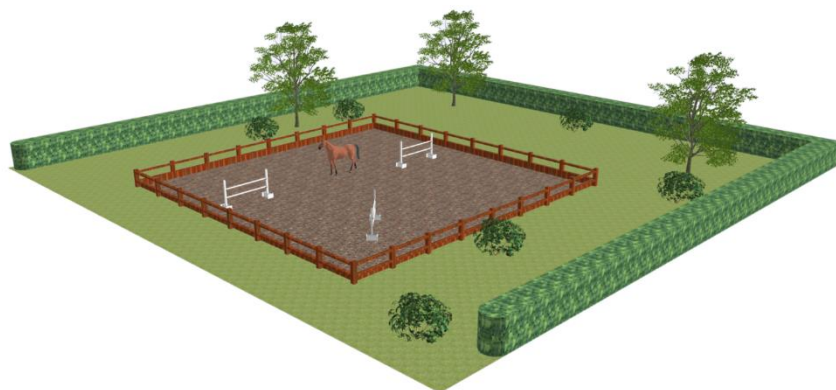


Figure 4 Example of a manège that is not permitted development

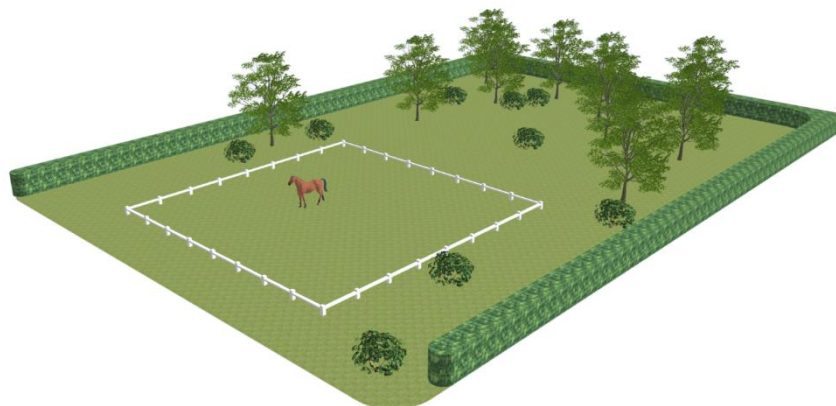


Figure 5 Example of a manège that is permitted development

Addressing the effects of Equestrian uses

Lighting

- 7.14 In general, horse care and other related activities occur in the early morning and evening hours, therefore equestrian facilities often require adequate lighting. In particular, security lighting is generally used for yard areas and manèges may include floodlighting. However, external lighting can create issues for local wildlife, particularly bats, and it can negatively impact local dark skies. Equestrian development should seek to minimise light pollution. Locations within the setting of the Broads or in the National Landscape (formerly AONB) will need to pay particular attention to lighting. Some Neighbourhood Plans also contain dark skies policies.
- 7.15 Lighting should be designed in a way that reduces negative impact on the surrounding environment. This includes strong consideration of the effects on nearby habitats, including woodland and hedgerow which can be quite common habitat features adjacent to equestrian sites. Giving consideration to the height and angle of lighting can help mitigate impact by reducing spill and light pollution. Non-glare and low-glare lights should also be considered. It is strongly encouraged that proposals that include floodlighting are accompanied by a lux plan demonstrating no adverse light spill onto the landscape and surrounding habitats. Planning applications including lighting should be accompanied by detailed lighting assessments and habitat/protected species surveys.

Muck Storage and Muck Heaps

- 7.16 Horse manure, as a good source of nutrients, is often used as a fertilizer for crops and gardens, therefore it is not uncommon for muck storage to be erected to complement other equestrian development. However, negative impacts can arise from muck storage, particularly those adjacent to



watercourses as manure can pollute the water. Watercourses are considered a special feature forming the character of East Suffolk's landscape and are of ecological value; therefore, it is particularly crucial that they are protected. It can also have some effects on nearby residential amenity through odour and attraction and breeding of flies. Muck heaps should never be burnt, and much should be transported away from sites by trailer.

- 7.17 Muck storage should be located and designed in a way that reduces negative impact on the surrounding environment.
- 7.18 As per Government Guidance⁸⁸, muck storage should not be erected:
- Within 10m of inland freshwaters or coastal waters.
 - Within 50m of a spring, well, or borehole that supplies water for people to drink.
 - Nearby field drains.
- 7.19 Liquid waste – which can comprise of contaminated water from dirty yards, washing out of stables, soaking hay, and exercise pools – can also pollute watercourses within a rural setting. Therefore, it is important that adequate drainage systems using non-permeable materials are considered for horse livery yards, and other equestrian facilities.
- 7.20 Conditions can be added on equestrian development consents requiring a muck storage and removal plan to reduce environmental impact. Further government guidance on dealing with waste can be found online at <https://www.gov.uk/keeping-horses/dealing-with-waste>.

⁸⁸ <https://www.gov.uk/guidance/rules-for-farmers-and-land-managers-to-prevent-water-pollution#storing-manure>

Grazing Impact

- 7.21 Horses, much like sheep and cattle, can be used for grazing agricultural land for the purposes of land management. Pastures are also often used on equestrian land-use for the purposes of exercising and socialising horses but also to provide a food source for horses. Grazing is widely beneficial as it maintains the landscape, however overgrazing can have a detrimental impact as it reduces groundcover which can consequently result in land erosion. Although this is likely an insignificant issue for agricultural land management due to rotational grazing systems, overgrazing can be prevalent on equestrian land-use pastures particularly on County Wildlife Sites. As horses are considered selective grazers, the landscape can be drastically altered by leaving undesired plant species.
- 7.22 Generally, overgrazing issues on agricultural land is not a planning policy issue, but best practice is strongly encouraged. Equestrian land use on grassland county wildlife sites should be avoided where possible to prevent adverse impact on biodiversity of the site.

Listed Building Impact

- 7.23 East Suffolk has a widely recognised high quality and important historic environment with 4,000 listed buildings. With such rich heritage across the district, it is not uncommon for new equestrian development to sprawl across land or be built as ancillary to existing listed buildings, however this can negatively impact the historic environment in a rural setting.
- 7.24 New structures should be designed in a way that reduces impact on listed buildings, the setting of listed buildings, and the historic landscape. Giving consideration to the siting of the new structures by clustering agriculture



and equestrian uses, as historically done, can help mitigate development sprawl, which can be detrimental to the setting of listed buildings and the historic landscape. Where new ancillary buildings are within close proximity of a listed building or within the setting of a listed building, bespoke design should be considered. Utilising planting to screen new development from listed buildings is also strongly encouraged.

- 7.25 The Historic Environment Supplementary Planning Document provides further information on mitigating adverse impact on listed buildings, the setting of listed buildings, conservation areas, and the historic landscape.

Historic Boundaries

- 7.26 East Suffolk's rural environment, as a large district, consists of a variety of distinctive landscape elements. Field boundaries, which have historically been used to restrict the movement of animals in a rural setting, are a distinctive feature within the landscape and form part of the historic environment. These boundaries can comprise of built structures such as fencing but can also comprise of natural features such as treelines and hedgerows. Removal of these field boundaries can drastically alter the landscape and negatively impact the historic environment, particularly where defined boundaries are listed.
- 7.27 Many hedgerows within the rural setting are protected by the Hedgerow Regulations 1997⁸⁹ subject to meeting the criteria within the legislation. These can include hedgerows within or adjacent land used for agriculture or the breeding or keeping of horses.
- 7.28 Equestrian development should be designed so as to not result in the removal or detrimental modification of these boundaries. Development

should retain these landscape features and, where possible, enhance them. Adding a buffer between protected hedgerows and paddocks, or other equestrian structures, is strongly encouraged.

Access

Bridleway Connections

- 7.29 As a principle, equestrians will use local movement networks in the leisure pursuit of horse riding and this will generally include the public right of way (PROW) network, in particular bridleways and byways. Horse riding has significant health and leisure benefits, therefore improved connectivity can be highly valuable. New equestrian enterprises, especially riding schools and liverys, should consider the available local bridleway and off-road riding network as part of the site selection process. Sites with good bridleway access will be seen more positively in planning terms than sites without such access. Where there is little in the way of bridleway access, larger proposals may need to propose new bridleways or wider riding land to avoid an over reliance on riding on roads, which may bring highway safety concerns. In some cases the County Council Public Rights of Way service may seek improvements to the bridleway network as a result of intensified horse riding and its effects on the quality of routes. The appropriate design of active travel infrastructure for equestrian use is covered within the Active Travel chapter of the Healthy Environments Supplementary Planning Document.

Vehicle Access

- 7.30 Fields for rural equestrian development may have limited or no existing vehicle access. Equestrian facilities, particularly large commercial equestrian

⁸⁹ <https://www.legislation.gov.uk/uksi/1997/1160/contents/made>



centres, may require access for the use of horseboxes or customers. Suitable access design, i.e. the use of hardstanding materials, is strongly encouraged, however new vehicle access should not have an adverse impact on the landscape or the rural highway network.

Environmental Protection Considerations

Animal Licensing

- 7.31 Equestrian buildings used for commercial purposes (such as riding schools) may require licensing and therefore it is recommended that DEFRA Guidance Documents are followed to ensure that the development complies. Currently, licenses are issued under the Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018.

Water Supply

- 7.32 If the development involves connecting to an existing private water supply (such as well, borehole, or spring), or the creation of a new private water supply, then advice should be sought from the Council's Environmental Protection Team prior to commencing works. All works undertaken must comply with the Private Water Supplies Regulations 2016 (as amended).



8 Tourism Accommodation

- 8.1 Rural tourism can be an important addition to the rural economy by supporting growth and employment in the local area. National Planning Policy Framework Paragraph 88⁹⁰ states that policy and decisions should seek to enable sustainable rural tourism. Both the Suffolk Coastal Local Plan and Waveney Local Plan support tourism accommodation initiatives that enhance and broaden the choice of accommodation and visitor destination facilities, which promote year-round tourism and longer stays. However rural tourism accommodation can have a negative impact on the character of the area and prove unsustainable if not suitably designed and located. Accordingly, the local plans set the criteria to ensure any tourism accommodation development is appropriate.

Policy

- 8.2 These are the key policies relating to new tourism accommodation in rural areas:

Suffolk Coastal Local Plan policies:

- [Policy SCLP6.1: Tourism](#)
- [Policy SCLP6.2: Tourism Destinations](#)
- [Policy SCLP6.3: Tourism Development within the AONB and Heritage Coast](#)
- [Policy SCLP6.4: Tourism Development outside the AONB](#)

Waveney Local Plan policies:

- [Policy WLP8.15: New Self Catering Tourist Accommodation](#)
- [Policy WLP8.16: New Hotels and Guest Houses](#)

- [Policy WLP8.17: Existing Tourist Accommodation](#)

National Planning Policy Framework: Para 88

- 8.3 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;
 - b) the development and diversification of agricultural and other land-based rural businesses;
 - c) sustainable rural tourism and leisure developments which respect the character of the countryside; and
 - d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

Policy Guidance

- 8.4 Topics covered in this chapter:
- Permanent or non-permanent structure
 - Commercial, recreational or entertainment facilities
 - Transport (vehicular, public transport and cycling)
 - Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) Impact
 - Scale and Design
 - Sustainability

⁹⁰ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>



- Additional National Landscape (formerly AONB) criteria
- Demonstrating Demand
- Planning Condition
- Permitted Development Rights (Campsites)

Permanent or non-permanent structure

- 8.5 Policy SCLP6.5 of the Suffolk Coastal Local Plan and policy WLP8.15 of the Waveney Local Plan only allow tourist accommodation comprising permanent buildings in certain circumstances as permanent buildings can have a long-lasting impact upon the character of the countryside. These circumstances are listed in the policy. Outside of these defined circumstances only non-permanent structures will be allowed subject to a set criteria.
- 8.6 What constitutes a permanent structure is a matter of fact and degree and some guidance can be found below.
- 8.7 Both Local Plan policies in this respect incorporate the consideration of tents, touring caravans and motorhomes/campervans which will always be seen as temporary/non-permanent and planning permissions will consider the use of land for the siting of a specific number of pitches. These provisions may also require associated permanent buildings or temporary structures, such as toilet/shower blocks and permanent physical site alterations such as access roads, pitch hard standings and new accesses.



Associated toilet and shower block, Church Farm Glamping and Campsite, Redisham

- 8.8 Structures such as teepees, yurts and safari tents are usually temporary structures even though they may remain in place for many years or whole seasons. Some structures such as shepherd's huts on wheels are deemed to be temporary but due to their limited facilities are also not a Caravan Act compliant 'caravan'. They are more akin to a touring caravan or trailer.
- 8.9 In addition, 'eco-pods' or 'camping-pods' have become common in recent years. Some of these are little more than a shed designed to provide tent-like accommodation and do not contain a kitchen or toilet facilities. These are considered to be permanent buildings, in the same way as a shed. Other such 'pods' are larger and may contain a kitchen and bathroom and may be considered as being Caravan Act compliant structures.
- 8.10 Some structures that fall under the definition of a caravan under the Caravan Act do not normally constitute a permanent structure. These include mobile homes/static caravans, chalets, lodges and various other forms of pre-fabricated accommodation. A caravan usually comprises of a unit which



complies with Section 29 of the Caravan Sites Act 1968 (as amended)⁹¹. The relevant criteria to meet the definition of a caravan is:

- Length (excluding any drawbar) up to 20 metres
- Width up to 6.8 metres (to meet transportation requirements this would be in two sections joined on site)
- Overall height (internally, from the floor at its lowest to the ceiling at its highest) 3.05 metres
- It must be transported on and off site by a vehicle (this can be in two parts).

It must also be:

- A structure, and not a building
- Fit for human habitation – therefore including a kitchen, bathroom and living space
- Capable of being moved from place to place, including around its site once assembled.

8.11 However, alterations to the caravan can render the structure as permanent. There are three key tests used to determine whether a structure is permanent which are; size, permanence, and physical attachment.

8.12 It will be necessary to examine the structure in light of the three tests of size, permanence and physical attachment in order to determine whether or not it complies with Section 29 of the Caravans Site Act 1968 (as amended).

8.13 **Size** – The larger the structure the more permanent it is likely to be as it will be more difficult and unwieldy to move. A large structure will have a greater

and potentially more damaging impact upon the surrounding landscape particularly in areas of open landscape. Furthermore, larger structures are likely to be more suitable for permanent living accommodation which is contrary to the policies’ ambition.

8.14 Whilst a unit that conforms to a caravan under the Caravan Act would not normally be deemed permanent it is important to note that changes over time can make a Caravan Act compliant structure a permanent structure. The addition of extensions, for example a conservatory, can create a sizeable structure that is considered permanent. It should also be noted that the sizes detailed within the Caravan Act include the internal dimensions.

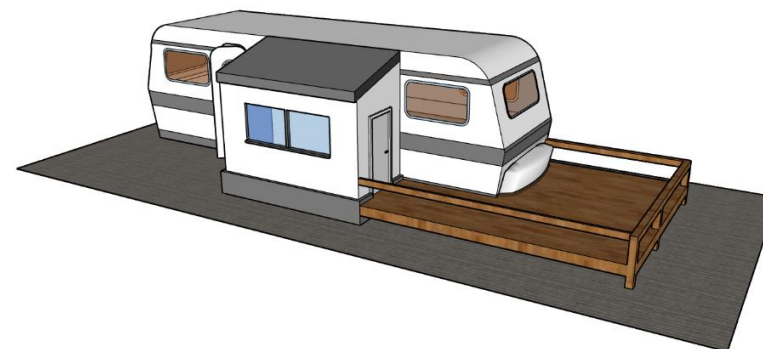


Figure 6 Example of an extension to a caravan rendering that is no longer Caravan Act compliant

⁹¹ <https://www.legislation.gov.uk/ukpga/1968/52>



- 8.15 Furthermore, a unit could be considered cumulatively with its surroundings. For example, connections from the unit to other structures means that the size could be considered holistically.
- 8.16 **Permanence** – The test of permanence may be an obvious point, but it remains a key test. Here the consideration is how easily it can be moved as well as the intended use for the structure. The Caravan Act states that for a structure to be considered a caravan it must be capable of moving whether by being towed, or by being transported on a motor vehicle or trailer. Should a structure be incapable of movement it would suggest a high degree of permanence. Furthermore, it should be movable in no more than 2 parts that is designed to be assembled on a site by means of bolts, clamps or other devices. Permanence may be created over time, for example, through the removal of manoeuvring wheels from a mobile home and bricking it in with a plinth.
- 8.17 If a structure is difficult to remove from site this would create a longer lasting impact to the landscape contrary to the intentions of the policy.
- 8.18 **Physical Attachment** – The level of physical attachment to the ground is a key consideration in ascertaining permanence. Strong attachment or multiple attachments suggests that the structure has a higher degree of permanence. Similar to the permanence test, consideration should be given to how easily any attachments to the ground are removed, for example can it be done by hand, or does it require heavy or specialist machinery?
- 8.19 The construction of a foundation such as a concrete pad (which in itself is not easily removed) and permanent attachment to the pad could also be a sign of permanence.

Commercial, recreational or entertainment facilities

- 8.20 The Waveney Local Plan states under policy WLP8.15 that large self-catering tourism accommodation sites (80+ pitches/units) formed of permanent buildings will only be permitted within settlement boundaries, through conversion of rural buildings of permanent structure or where commercial, recreational or entertainment facilities are provided on site. Other large sites comprising of self-catering tourism will also be supported where:
- They are in or close to Lowestoft, the market towns, or the coastal resort towns of the district;
 - A Transport Assessment has been submitted demonstrating no significant impacts on the highway network;
 - Safe and convenient access to public transport and local services and amenities are provided;
 - Covered cycle storage proportionate to the size of the site is provided on site; and
 - Commercial recreational or entertainment facilities are provided on site.
- 8.21 The Suffolk Coastal Local Plan under policy SCLP6.5 (New Tourist Accommodation) states that tourist accommodation comprising permanent buildings will only be permitted within settlement boundaries, through the conversion of buildings of permanent structure where they lie outside the Settlement Boundary, on medium and large scale sites where commercial, recreational or entertainment facilities are provided on site; or where such development forms part of a comprehensive masterplan which supports wider landscape and ecological gain.
- 8.22 Whilst the Suffolk Coastal Local Plan does not provide a definition of large or medium scale it would be reasonable to use the same definitions as the



Waveney Local Plan. The definition of a small-scale self-catering tourist accommodation development is 10 pitches/units or fewer, a medium sized site is 11-79 pitches/units with good access to A or B roads and public transport. A large site is defined as 80+ pitches/units.

- 8.23 The amount and scale of the commercial, recreational and entertainment facilities will be reflective of the number of pitches/units proposed and where it relates to an extension of an existing park the level of facilities will also be relative to the existing facilities on site.
- 8.24 On smaller extensions or new medium sized sites, the new facilities are likely to be smaller. These can include, but are not limited to, children's play spaces, sports pitches (such as tennis courts or 5 aside football), small amusements and retail units supporting the residents.
- 8.25 For very large sites the facilities could include, but are not limited to, large amusements, swimming pools, entertainment venues and larger restaurants. The facilities will ultimately be appropriate to its size.
- 8.26 A key question is what level of facilities can be supported by the site. A larger development will be able to support and will require larger/more facilities to meet its occupants' needs. To support the application, the justification for the level of facilities and services should be provided with reference to what a site of its size can support.
- 8.27 A further consideration is the level of access to existing facilities in nearby settlements. If the site has poor, unsafe or indirect connections to nearby settlements it highlights the need for more facilities on site to meet the needs of the visitors and avoid unsustainable travel. However, a well-connected site may be able to share facilities (for example a village shop or village pub) creating mutual benefit for both. In such circumstances the type

of facility provided should factor the nearby accessible services and consider meeting any gaps in services.

- 8.28 For example, if the adjacent village has a public house that is accessible but not a village shop, the new tourism accommodation may want to consider the provision of a shop to meet both its own needs and provide a service for the village.
- 8.29 However, where facilities are provided within the new tourism site, but the site is not accessible to nearby settlements care must be taken that the larger facilities (such as restaurants or swimming pools) do not become destinations to the wider public. Facilities that have a wider catchment than the site itself should be sustainably located to avoid unsuitable car journeys. Accordingly in less sustainable locations the facilities should only be of a size to meet the site's needs.

Transport

Vehicular

- 8.30 New tourism accommodation can create a significant level of traffic flow, not only from the arrival and departures of visitors, but also from daily trips from the staff. The level of traffic created will be proportionate to the size of the proposed development itself. Accordingly, the road network should be able to accommodate the volume of traffic generated without having a significant adverse impact on the free flow of traffic and highway safety.
- 8.31 Clearly in most cases larger main roads will be better able to accommodate the traffic subject to a suitable and safe access being formed. Narrow rural roads and minor roads that bisect villages are less likely to be able to accommodate the increased level of traffic. Suffolk County Council as the Highway Authority will be a key statutory consultee in determining the



suitability of the road network. Early engagement with Suffolk County Council and obtaining pre-application advice will give an indication as to the roads suitability before an application is submitted.

- 8.32 Demand for electric charging points for vehicles is anticipated to increase significantly in the coming years. Local Plan policies WLP8.21 Sustainable Transport and SCLP7.2 Parking Proposals and Standards both support development where facilities are provided for charging plug-in and other ultra-low emission vehicles. EV charging points for pitches at camping, glamping and Park Homes will be supported.

Public Transport

- 8.33 The Waveney Local Plan requires medium and large-scale tourism sites to have good access to public transport. It should be noted that whilst the tourism accommodation policies within the Suffolk Coastal Local Plan do not have this requirement, policy SCLP7.1 (Sustainable Transport) requires development to consider all available opportunities to enable and support travel by public transport. Furthermore, policy WLP8.21 (Sustainable Transport) of the Waveney Local Plan supports development that improves public transport in the rural areas of the district (amongst other criteria). Accordingly, all development should be mindful of public transport connections.
- 8.34 Submitted applications should demonstrate its access to nearby public transport. It should detail all bus stops and rail stations within close proximity. Sustrans Document 'Walkable Neighbourhood'⁹² and the TCPA Document '20-minute neighbourhood'⁹³ suggests 800 metres as an acceptable distance to walk for most people. The document 'Walkable

Neighbourhoods' recommended that bus stops are no more than 400 metres.

- 8.35 It is then important to show how the site connects to these public transport points. You must be mindful of safety and any mixing of pedestrians with traffic should be avoided in determining that a public transport hub is accessible to the site. Wide, well surfaced routes segregated from the highway that are suitable for all users including those with mobility impairments will ensure that the development is truly accessible to the public transport network. Whilst a public transport nexus may be nearby, if it is poorly connected it will likely receive negligible use.
- 8.36 It is important to remember that some visitors will use public transport as their primary mode of traveling meaning they will potentially need to take luggage, pets and young children in prams along this route.
- 8.37 If the existing connections are either poor, (for example narrow, overgrown, broken surfaced or unsafe) or non-existent then the applicant will need to detail how this will be overcome to ensure the site is sustainable. This will most likely be by way of improving the pedestrian/cycling network connecting to public transport hubs, alternatively new bus stops could be created closer to the site. If this approach is taken, then the applicant will need to demonstrate certainty that a bus company is going to provide the bus service.
- 8.38 Private shuttle buses are rarely an acceptable solution due to the difficulty in ensuring that the service remains in place and viable in the future.

Cycling

⁹² <https://www.sustrans.org.uk/media/10520/walkable-neighbourhoods-report.pdf>

⁹³ <https://www.tcpa.org.uk/resources/the-20-minute-neighbourhood/>



- 8.39 The Local Plan policies state that medium and large sized developments should provide cycle parking proportionate to the site. The Suffolk Guidance for Parking 2023 states that caravan parks should provide 2 cycle parking spaces per 5 pitches. This guidance will apply to other forms of tourism accommodation in rural locations such as camping, glamping and lodges. However, it should be noted that hotels require a different formula.
- 8.40 The policy states that the cycle parking should be covered thus protecting the bicycles from poor weather. Consideration should also be given to the security. Cycle storage that is lockable, is visually overlooked and (where appropriate and mindful of light pollution) is well lit will improve the security to the bike. Furthermore, covered cycle storage will generally be of a greater mass than its non-covered counterpart so the design should provide an overall benefit to its surroundings and avoid being strictly utilitarian in unsuitable locations.
- 8.41 Consideration should be given to how the development connects into the existing cycle network to ensure the visitors have the most safe and beneficial connections into the countryside. Working alongside Suffolk County Council and East Suffolk Council to improve bridleways and upgrade footpaths can be mutually beneficial and ensure the development complies with sustainable transport policies SCLP7.1 and WLP8.21 which aim to integrate into and enhance the cycle network.
- 8.42 East Suffolk adopted its East Suffolk Cycling and Walking Strategy in 2022 which seeks to guide development and provides opportunities to improve the cycling and walking network. Complying with the East Suffolk Cycling and Walking Strategy will help the development comply with policies SCLP7.1 and WLP8.21.

- 8.43 Please note there are also a number of quiet lanes⁹⁴ within East Suffolk which are nationally designated roads that are intended to be used as a shared space between motorists and other uses. The quiet lane should be marked by an advisory sign. This status does not necessarily make them a route where walking and cycling is encouraged in planning considerations.

Recreational Disturbance Impacts at European Designated Nature Conservation Sites

- 8.44 Creating improved access to the countryside and East Suffolk's natural environment can have numerous positive impacts and can be an attraction to visitors. However, care needs to be taken to ensure that increased recreation doesn't adversely impact the special qualities of the natural environment. There are a number of Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites both within East Suffolk and in the surrounding Local Planning Authorities.
- 8.45 As with residential development, it is likely that tourism accommodation will also be required to make a Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) payment and/or provide additional green infrastructure measures on site depending on the nature, location and scale of the development (this may include walking routes within the site/dog walking areas etc). The approach for each development will need to be assessed by a project level Habitats Regulation Assessment (HRA). Sites that are within, or adjacent to, these designated areas should focus on improving existing pathways/routes away from designated sites. Larger sites may want to consider creating walking routes (potentially suitable for dog walking) within the site utilising landscaping to create attractive routes that reduces the need to journey off site.

⁹⁴ <https://www.quietlanessuffolk.co.uk/>



8.46 Further guidance on the Suffolk Coast RAMS can be found on the East Suffolk website.⁹⁵.

Scale and Design

8.47 The Suffolk Coastal Local Plan states under policy SCLP6.5 that new tourist accommodation will be acceptable where it is of a high standard of design and is of an appropriate scale. It should be noted that whilst the Waveney Local Plan equivalent policy WLP8.15 does not have this stipulation it should still conform with policy WLP8.29 Design which includes criterion requiring protection of the wider amenity of the wider environment, and neighbouring uses amongst others.

8.48 Holiday properties, including homes, caravans, and campsites, typically generate more smoke and noise than permanent dwellings. People on holiday have more bonfires, hold more BBQs, and will create more noise often late into the night. A holiday property can potentially create a different living environment from permanent homes and impact the amenity of neighbouring properties. It is recommended that the impact of noise and smoke is considered and minimised where possible to avoid complaints and issues with neighbours.

8.49 Special consideration needs to be given to the rural listed buildings and heritage assets. Within a rural environment a heritage asset will often be highly visible with a strong relationship to the surrounding landscape. The site should be designed to preserve the setting of important heritage assets. New sites can provide opportunities to mitigate impacts or even enhance the landscape with generous additional planting. Tourism sites significantly

benefit from tree and hedge planting, particularly in providing privacy between pitches/units and such opportunities should be maximised.

8.50 Often permission will be granted for the number of pitches for caravans without specific designs for the caravan itself. However, the Planning Authority will consider the layout, access and design of ancillary buildings such as a reception.

8.51 Where permitted development rights are utilised and caravans are sited without the benefit of planning permission, then permission may still be required for the associated structures. For example, hard surfaces for internal access and parking, shower blocks and reception buildings may still require planning permission.

8.52 The scale and design should have due consideration on the impact on the amenity of neighbouring uses.

Sustainability

8.53 Policy SCLP6.3 and SCLP6.4 of the Suffolk Coastal Local Plan guides tourism development both within and outside the National Landscape's (formerly Area's of Outstanding Natural Beauty (AONB)) respectively and both require long-term sustainability enhancements. Within the National Landscape the term 'sustainability' has additional definition which will need to be considered in any application.

⁹⁵ <https://www.eastsuffolk.gov.uk/planning/developer-contributions/rams/>



Example of tourism accommodation, Church Farm Glamping and Campsite, Redisham

8.54 Sustainable tourism is defined as tourism development that actively enables the wider environmental objectives of the National Landscape Partnership. These objectives are stated in the Suffolk & Essex Coast & Heaths National Landscape Management Plan⁹⁶ under section 4.

8.55 Enhanced sustainability can be achieved through a number of different ways and should aim to improve the wider area. Measures will need to be proportionate to the applications size. Below are some examples of how sustainability can be improved:

- Improved active transport networks
- Sustainable energy generation
- Electric vehicle charging
- Connection to existing local services and attractions
- Internal day-to-day facilities (limit vehicle movements out of site)
- Planting (biodiversity enhancements)

⁹⁶ <https://coastandheaths-nl.org.uk/managing/management-plan/>

⁹⁷ <https://www.eastsuffolk.gov.uk/assets/Planning/Sizewell/Suffolk-Coast-and-Heaths-AONB-Natural-Beauty-and-Special-Qualities-Indicators.pdf>

- Habitat creation
- Reduction of noise and light pollution (maintaining or creating Dark Skies)

8.56 The key measure is that the sustainability enhancements should be ‘long term’ so the applicant should demonstrate the long-term benefits of the scheme.

Additional National Landscape (formerly Area’s of Outstanding Natural Beauty (AONB)) Criteria

8.57 There are criteria outlined under policy SCLP6.3 that are unique to the AONB, now known as National Landscapes. The policy requires that any development is of a scale and extent that it does not have a significant adverse impact on the primary purpose of the National Landscape designation.

8.58 The policy supports the conservation and enhancement of the natural beauty, special qualities, and purposes of designation of the National Landscapes. To better understand the special qualities then it is useful to reference the Natural Beauty and Special Qualities Indicators Document⁹⁷ within the Design and Access Statement. The Design and Access Statement would be expected to show how the scheme addresses these special qualities. The Suffolk & Essex Coast & Heath National Landscape Management Plan⁹⁸ also shows some of the special qualities.

8.59 Criterion I) states that development should avoid locations sensitive to the exposed nature of the National Landscape (AONB) and Heritage Coast. The National Landscape contains important landscapes of a high visual value. The

⁹⁸ <https://coastandheaths-nl.org.uk/managing/management-plan/>



construction of new buildings or structures can have a significant negative impact upon special features of the National Landscape, particularly developments that are tall or bulky. Developments that are likely to have an adverse impact on the character and damage key vistas will not meet this criterion.

- 8.60 The policy encourages engagement with local communities and the Suffolk & Essex Coast & Heaths National Landscape Management Unit in early design stages. The level of engagement should be proportionate to the scale of the development. For large-scale developments engagement could be in the form of workshops allowing in-depth conversations and co-operative working. Safety permitting these would be best undertaken in person but can also be taken virtually. For smaller scale projects this could be done through an informal consultation via letter and e-mail to the relevant bodies/people, but maximising engagement is still encouraged.
- 8.61 Whatever level of engagement is undertaken proof of your approach should be submitted to support the application.
- 8.62 To understand the vision and objectives for the Suffolk & Essex Coast & Heaths National Landscape please see the areas management plan and its guidance for planning⁹⁹ which includes guidance on colour schemes and special qualities.

Demonstrating Demand

- 8.63 Criterion a) of policy SCLP6.5 of the Suffolk Coastal Local Plan requires applications for new tourism accommodation to clearly demonstrate the

demand or need for the accommodation. At this time we recognise there is generally demand across the district and demand will increase, so as a starting point we will generally accept the existence of a need. However, we will retain the right in accordance with the policy to request that the applicant demonstrate this need. This can form part of any accompanying planning statement. The demonstration of demand/need can look to draw upon a number of different sources from local and national level. A non-exhaustive list of potential evidence sources has been included below:

- Economic Impact of Tourism Report¹⁰⁰
- Ipswich Economic Area Sector Needs Assessment: Final Report¹⁰¹
- East Suffolk Visitor Economy Strategy 2022 – 2027¹⁰²
- Suffolk & Essex Coast & Heath Management Plan¹⁰³
- Robust questionnaires of local visitors and local tourism accommodation operators.
- Evidence of market research.

- 8.64 The demonstration of demand should detail why there is a demand/need within this specific locality. Providing a focus solely upon a regional, county or district level is unlikely to be sufficiently local.

⁹⁹ <https://coastandheaths.org/managing/planning/guidance-for-planning-in-the-aonb/>

¹⁰⁰ <https://www.thesuffolkcoast.co.uk/tourism-research-and-reports>

¹⁰¹ <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Local-Plan-Review/Evidence-base/Employment-Land-Needs-Assessment-2017.pdf>

¹⁰² <https://www.eastsuffolk.gov.uk/assets/Business/East-Suffolk-Visitor-Economy-Strategy.pdf>

¹⁰³ <https://coastandheaths-nl.org.uk/managing/management-plan/>



Holiday Condition

8.65 Any permission granted for new tourism accommodation will, by means of planning conditions or obligations permit holiday use only, restricted to a continuous period of 56 days by one person or persons within one calendar year, plus require a register of all lettings, to be made available at all times. Only in exceptional circumstance or where sites are an extension to an established site will a condition for longer occupancy, for example 11 months per year, be acceptable.

8.66 Below is an example condition for 56 days occupancy limit:

*There shall be no more than **(add number of permitted units)** located on the site at any one time. The approved units shall be occupied solely as holiday accommodation and for no other purpose whatsoever including residential use. No unit shall be occupied for more than 56 consecutive days in any calendar year by the same person or persons. The owner shall maintain, and keep available for inspection at all reasonable times, an up-to-date register of lettings.*

8.67 And for an 11 month occupancy limit:

The approved static caravans shall be used for holiday/tourism accommodation only and for no other purpose unless express planning permission is granted by the Local Planning Authority (LPA). No caravan on the site shall be occupied between 31 January and 01 March in any one year unless otherwise formally approved in writing by the LPA.

The owners/operators of the holiday units hereby permitted shall maintain an up-to-date register of all lettings, which shall include the names and addresses of all those persons occupying the units during each individual

¹⁰⁴ <https://www.legislation.gov.uk/uksi/2023/747/article/3/made>

letting. The said register shall be made available at all reasonable times to the LPA.



Meadow Lodges, Bredfield (Source: Meadow Lodges)

Permitted Development Rights (campsites)

8.68 New permitted development rights¹⁰⁴ have come into force relating to temporary recreational campsites for tents and motorhomes/campervans. The full legislation has been included below (as of September 2023). Presently the Council is determining how this permitted development may be affected by the Habitat Regulations in respect of recreational effects:

Permitted development

BC. Development consisting of—



(a) the use of any land as a recreational campsite for not more than 60 days in total in any calendar year; and

(b) the provision on such land of—

(i) not more than 50 pitches; and

(ii) any moveable structure reasonably necessary for the purposes of the permitted use.

Development not permitted

BC.1 Development is not permitted by Class BC—

(a) on a site of a scheduled monument;

(b) in a safety hazard area;

(c) in a military explosives storage area;

(d) on a site of special scientific interest;

(e) on a site of a listed building;

(f) for the siting of any caravan except a caravan which is used as a motor vehicle designed or adapted for human habitation.

Conditions

BC.2 Development is permitted by Class BC subject to the following conditions—

(a) the developer must make on-site provision for users of the campsite of toilet and waste disposal facilities;

(b) the developer must notify the local planning authority in writing before commencement of development in each calendar year, providing a copy of the site plan, which must include particulars of—

(i) toilet and waste disposal facilities; and

(ii) the dates on which the site will be in use;

(c) the local planning authority (if not the same body as the fire and rescue authority in an area) must as soon as practicable provide to the relevant fire and rescue authority the notice described in paragraph BC.2(b); and

(d) where the proposed development is on land within Flood Zone 2 or Flood Zone 3, the permitted development is subject to prior approval by the local planning authority before commencement of development in each calendar year.



9 Small Scale Renewable Energy Generation

- 9.1 In rural areas some village halls, farms and commercial businesses may benefit from generating on-site renewable or low carbon energy to reduce energy costs. On-site energy generation in rural areas can be useful to power farm equipment, individual buildings or small businesses where there is no connection to the national grid and connecting to the national grid could be expensive or problematic.
- 9.2 This chapter is intended to assist anyone interested in on-site renewable and low carbon energy generation in rural areas. This chapter provides information and guidance including whether planning permission is required.

Policy

- 9.3 These are the key policies relating to small scale, on-site, renewable and low carbon energy generation in rural areas:

Suffolk Coastal Local Plan policies:

- [Policy SCLP9.1: Low Carbon & Renewable Energy](#)
- [Policy SCLP9.2: Sustainable Construction](#)

Waveney Local Plan policies:

- [Policy WLP8.27: Renewable and Low Carbon Energy](#)
- [Policy WLP8.28: Sustainable Construction](#)

¹⁰⁵ <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Sustainable-Construction-2022/FINAL-Sustainable-Construction-SPD.pdf>

¹⁰⁶ <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/census2021howhomes>

- 9.4 The [Sustainable Construction Supplementary Planning Document](#)¹⁰⁵ (2022) provides information and guidance on renewable and low carbon energy schemes in Chapter 9. This includes information on community-led energy schemes, district heat networks and the different types of renewable and low carbon energy generation available.

Policy Guidance

- 9.5 Topics covered in this chapter:

- Residential Energy Generation
- Roof Mounted photovoltaics (PV)
- Solar Power Farm Equipment
- Heat pumps
- Biomass Boilers
- Wind Turbines

Residential Energy Generation

- 9.6 Many rural properties in East Suffolk are not connected to mains gas and are dependent on either oil, Calor gas, electric or solid fuel such as wood or coal.
- 9.7 The [2021 census](#)¹⁰⁶ showed in East Suffolk:
- 67.6% of homes have mains gas central heating,
 - 9.2% have two or more types of central heating (not including renewable energy),
 - 8.7% have oil central heating,

[areheatedinyourarea/2023-01-05#:~:text=Census%202021%20found%20that%20around,types%20\(excluding%20renewable%20energy\).](#)



- 8.6% have electric heating,
 - 1.2% have tank or bottle gas central heating,
 - 1% have renewable central heating,
 - 1% have two or more types of central heating (including renewable energy),
 - 0.5% have wood or solid fuel central heating,
 - 0.2% are part of a district communal heat network, and
 - 1.4% had no central heating.
- 9.8 Oil must be stored according Building Regulations which set out requirements for the type of storage tank, the distance from buildings, pipework and type of enclosure around the tank. Oil tanks are usually large, bulky and unattractive features in the garden. It can be difficult to screen or enclose them as Building Regulation doesn't permit flammable materials nearby.
- 9.9 LPG Gas bottles must also be stored according to Building Regulations. The bottles need to be stored in an upright position in a well-ventilated place away from sources of heat and ignition. Larger domestic bulk LPG units are not usually attractive features in the garden.
- 9.10 Heating oil and LPG gas for households is not included in the government's energy price guarantee in the same way as gas and electricity. Prices for oil and LPG gas are subject to greater market volatility and prices fluctuate. There are significant works and costs associated in upgrading old tanks and pipework to Building Regulation standards. When energy prices increase, the risk of oil and LPG gas being stolen also increases.

¹⁰⁷ www.gov.uk/government/news/restrictions-on-sale-of-coal-and-wet-wood-for-home-burning-begin

- 9.11 Wood and coal and have less safety concerns. However, they are usually bought in bulk to reduce costs and therefore required sizeable log stores and coal bunkers. They do however have air quality impacts, and the sale of traditional house coal and wet wood in units under 2m³ is now unlawful. Wet wood sold in larger volumes must now be sold with advice on how to dry it before burning. All manufactured solid fuels must now have a low sulphur content and only emit a small amount of smoke¹⁰⁷. For some homeowners, this may be the trigger to move to more modern forms of domestic heating.
- 9.12 Photovoltaics, solar thermal and heat pumps can offer a low carbon and renewable energy alternative to fossil fuels and solid fuel. Further information on low carbon and renewable energy systems is available in the [Sustainable Construction SPD](#)¹⁰⁸.

Historic Buildings

- 9.13 In rural areas there are historic dwellings, historic buildings being converted to dwellings and historic churches and other buildings. Solar panels may be suitable on some historic buildings and should be located to minimize their effect on the appearance of the building. Heat pumps can be installed in some historic buildings but the units need to be placed in the least visible location possible.
- 9.14 Detailed guidance on improving energy efficiency and installing low carbon and renewable energy systems in historic properties is available in the:

¹⁰⁸ <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Sustainable-Construction-2022/FINAL-Sustainable-Construction-SPD.pdf>



- [East Suffolk Historic Environment SPD](#)¹⁰⁹ (2021),
- [Historic England Energy Efficiency and Historic Buildings: How to Improve Energy Efficiency](#)¹¹⁰ (2018), and
- [Historic England Energy Efficiency and Historic Buildings: Solar Electric \(Photovoltaics\)](#)¹¹¹ (2018).

Permitted Development Rights for domestic properties

- 9.15 [The Town and Country Planning \(General Permitted Development\) \(England\) Order 2015 \(as amended\)](#)¹¹² permits a dwellinghouse to install outlets for electric vehicles and a variety of renewable and low carbon onsite energy generation systems.
- 9.16 General Permitted Development Order, Part 2 Minor Operations:
- Class D – electrical outlet for recharging vehicles
 - Class E – electrical upstand for recharging vehicles
- 9.17 General Permitted Development Order, Part 14 Renewable Energy:
- [Class A – installation or alteration etc of solar equipment on domestic premises](#)
 - [Class B – installation or alteration etc of stand-alone solar equipment on domestic premises](#)
 - [Class C – installation or alteration etc of ground source heat pumps on domestic premises](#)
 - [Class E – installation or alteration etc of flue for biomass heating system on domestic premises](#)

¹⁰⁹ <http://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Historic-Environment-SPD/Historic-Environment-SPD-reduced.pdf>

¹¹⁰ <https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/>

- [Class F – installation or alteration etc of flue for combined heat and power on domestic premises](#)
- [Class G – installation or alteration etc of air source heat pumps on domestic premises](#)
- [Class H – installation or alteration etc of wind turbine on domestic premises](#)
- [Class I – installation or alteration etc of stand-alone wind turbine on domestic premises](#)

Roof mounted photovoltaic (PV)

- 9.18 Roof mounted solar PV can be installed on agricultural and commercial properties under permitted development rights with no planning permission required, subject to criteria set out the legislation. However, an application for Prior Approval must be submitted to the Local Planning Authority.
- 9.19 To maximise the benefits of solar power and minimise the negative impacts on the character of the surrounding countryside, it is recommended that you consider the following issues:
- Ensure the roof of any new building is orientated to maximise sunshine and energy generated by the solar panels.
 - Ensure any existing roof is of sufficient size and strength to support the required solar panels.
 - Where possible, locate panels on the roof slope least visible from the highway, public footpaths, bridleways and cycle paths to minimise the visual impact on the surrounding landscape.

¹¹¹ <https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/low-and-zero-carbon-technologies/>

¹¹² <http://www.legislation.gov.uk/uksi/2015/596/contents/made>



- Prioritise installing solar panels on modern farm buildings over historic barns and farmhouses

Permitted Development Rights for non-domestic properties

9.20 The [Town and Country Planning \(General Permitted Development\) \(England\) Order 2015 \(as amended\)](#)¹¹³ permits a range of renewable and low carbon onsite energy generation. Information on solar equipment on non-domestic buildings permitted in Class J is available here:

- [Class J – installation or alteration etc of solar equipment on non-domestic premises](#)¹¹⁴

9.21 When considering installing solar panels on or within the setting of historic buildings and barns it is preferable to locate them to minimise the impact on the appearance of the building. The East Suffolk [Historic Environment SPD](#)¹¹⁵ and Historic England’s [Energy Efficiency and Historic Buildings: Solar Electric](#)¹¹⁶ guidance provides more information on how to visually integrate solar panels into a historic building.

Solar Powered farm equipment

9.22 Solar panels whether mounted on the ground or a roof can be a cost effective method of providing power in remote locations where there is no existing connection to the national grid. Solar panels can generate electricity to run a range of farm equipment including:

- Solar panels on top of chicken sheds and trailers can be used to power heat lamps.

- Electric fencing can be powered using solar panels.
- Water pumps can be powered using solar panels on top of water storage tanks.
- Solar panels can be used to power heaters for animals.
- Greenhouses and animal enclosures may require mechanical ventilation which can be powered by solar panels.
- Sensors that allow off-site workers to monitor activity such as food levels and water consumption can be powered by solar panels.
- Lighting in buildings can be powered using solar panels.
- Electric and solar powered tractors and other machinery is becoming available.



Solar panels in the countryside

¹¹³ <http://www.legislation.gov.uk/ukxi/2015/596/contents/made>

¹¹⁴ <https://www.legislation.gov.uk/ukxi/2015/596/schedule/2/part/14/crossheading/class-j-installation-or-alteration-etc-of-solar-equipment-on-nondomestic-premises/made>

¹¹⁵ <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Historic-Environment-SPD/Historic-Environment-SPD-reduced.pdf>

¹¹⁶ <https://historicengland.org.uk/images-books/publications/eehb-solar-electric/>



Permitted Development Rights for non-domestic properties

- 9.23 The [Town and Country Planning \(General Permitted Development\) \(England\) Order 2015 \(as amended\)](#)¹¹⁷ permits a range of renewable and low carbon onsite energy generation. Information on stand-alone solar equipment in non-domestic premises permitted in Class K¹¹⁸.

Heat Pumps

- 9.24 There are three types of heat pumps; air-source heat pumps, ground source heat pumps and geothermal heat pumps.
- 9.25 The Future Homes Standard is expected to introduce changes to Building Regulations in 2025 that will require new build homes to meet to high energy efficiency and low carbon emission standards. Meeting these standards are likely to require the installation of heat pumps. Heat pumps can be installed in newly constructed dwellings, the conversion of existing buildings and barns into dwellings and into existing dwellings which are being upgraded.
- 9.26 Heat pumps can provide energy efficient and low carbon heating in a wide range of buildings in rural areas including in:
- Agricultural buildings, such as poultry units, to keep animals warm,
 - Agricultural buildings to dry crops,
 - Greenhouses to grow crops,
 - Industrial warehouses,
 - Farm shops and cafés, and
 - Agricultural buildings and barns converted to offices, retail and other uses.

- 9.27 Heat pumps in horticultural and agricultural industries can provide heat to help grow a variety of crops and the ‘dry heat’ that is produced from the ground source heat pumps can help reduce disease developing in plants. Heat generated from heat pumps can be a cost-efficient method of providing heating and can extend the productivity of crops.
- 9.28 Heat pumps have the potential to generate noise, and this should be considered during the design. A noise assessment may be required depending on the scale of the system, the number of units and the location of external units relative to neighbouring properties.
- 9.29 Further information on heat pumps is available from the [Energy Savings Trust](#)¹¹⁹ who have published an in depth guide to heat pumps.

Permitted Development Rights

- 9.30 The [Town and Country Planning \(General Permitted Development\) \(England\) Order 2015 \(as amended\)](#)¹²⁰ permits a range of renewable and low carbon onsite energy generation. Information on heat pumps permitted in Class L and Class M is available here:
- [Class L – installation or alteration etc of ground source heat pump on non-domestic premises](#)
 - [Class M – installation or alteration etc of water source heat pump on non-domestic premises](#)

¹¹⁷ <http://www.legislation.gov.uk/uksi/2015/596/contents/made>

¹¹⁸ <https://www.legislation.gov.uk/uksi/2015/596/schedule/2/part/14/crossheading/class-k-installation-or-alteration-etc-of-standalone-solar-equipment-on-nondomestic-premises/made>

¹¹⁹ <https://energysavingtrust.org.uk/advice/air-source-heat-pumps/>

¹²⁰ <http://www.legislation.gov.uk/uksi/2015/596/contents/made>



Biomass

- 9.31 Biomass is fuel derived from trees, plants and agricultural waste and by-products which can be used to produce electricity, heat and fuel for transport. Crops can be grown specifically to produce biomass energy.
- 9.32 Agricultural biomass can, through anaerobic digestion, produce biogas which can be burnt to produce electricity and heat. It can also through fermentation produce biodiesel or bioethanol and be used to fuel vehicles. Biodiesel is partly produced from vegetable oils and oilseeds and bioethanol is produced from cereals and sugar beet.
- 9.33 Biomass combined heat and power (CHP) units can be used for heating a variety of buildings. In rural locations which are off-grid or have limited energy options CHP units offer an alternative to oil boilers. The price of oil can vary leading to unpredictable costs unlike biomass fuel which is more stable in value. Biomass boilers operate at approximately 85% efficiency which is similar to oil fired boilers which operate at 70-85%. Biomass boilers are able to produce a consistent output of heat in large buildings and barns. this makes them particularly attractive for use in poultry sheds and other large buildings and barns.
- 9.34 Biomass boilers can potentially have negative impacts on air quality. An air quality assessment is usually required as part of a planning application. A permit may be required depending on the size and type of fuel used, and stack height approval will usually be required.
- 9.35 More information on biomass is available at:
- www.biomassconnect.org and

- www.eastsuffolk.gov.uk/environment/environmental-protection/air-quality/biomass-and-wood-burning/

Permitted Development Rights

- 9.36 The [Town and Country Planning \(General Permitted Development\) \(England\) Order 2015 \(as amended\)](#)¹²¹ permits a range of renewable and low carbon onsite energy generation. Information on biomass heating permitted in Class N is available here:
- [Class N – installation etc of flue for biomass heating system on non-domestic premises](#)

Wind Turbines

- 9.37 Onshore and offshore wind farms with a generating capacity of 50MW or less are determined by the Local Planning Authority. Energy schemes that generate more than 50MW are classed as Nationally Significant Infrastructure Projects (NSIPs) which are examined by the Planning Inspectorate who make recommendations to the Secretary of State who determines the application. There are a number of NSIP wind farms off the Norfolk and Suffolk coast with associated onshore equipment.
- 9.38 Individual wind turbines for agricultural and commercial use could reduce energy bills and enable small to medium businesses to achieve energy independence. Turbines are available in various sizes with different output capacities. This results in different financial pay back periods for the different wind turbines. Depending on the size, scale and location of the wind turbine it can have an impact on the character of the landscape and historic

¹²¹ <http://www.legislation.gov.uk/uksi/2015/596/contents/made>



environment. Wind turbines can also potentially have negative noise impacts which should be considered during the design and location of turbines.

9.39 The Suffolk Coastal Local Plan policy SCLP9.1 states “the Council will support Neighbourhood Plans in identifying suitable areas for renewable or low carbon energy development”. The Waveney Local Plan Policy WLP8.27 supports renewable and low carbon energy generation, including wind energy schemes where the proposal is in a suitable area defined in a Neighbourhood Plan. Policies SCLP9.1 and WLP8.27 apply to development for both single and multiple turbines whether for residential or commercial use.

9.40 Information on ‘made’ (adopted) Neighbourhood Plans in East Suffolk is available here:

www.eastsuffolk.gov.uk/planning/neighbourhood-planning/neighbourhood-plans-in-the-area/

Landscape Character

9.41 The Suffolk & Essex Coast & Heaths National Landscape (formerly AONB) has a position statement on [Renewable Energy in the Suffolk Coast & Heath Area of Outstanding Natural Beauty](#)¹²² (2014) and a [Management Plan](#)¹²³ (2023-28). The position statement sets out National Landscape’s support for small-scale renewable energy developments “where they are in keeping with conserving and enhancing natural beauty and do not detract from landscape character, either individually or cumulatively.” The statement also notes that “large scale developments for renewable energy within or affecting the

¹²² <https://coastandheaths.org/wp-content/uploads/2021/01/Position-Statement-on-Renewable-Energy-in-SCH-AONB-Apr-2014.pdf>

¹²³ <https://coastandheaths-nl.org.uk/managing/management-plan/>

setting of the National Landscape are likely to be inappropriate.” The Management Plan sets out the following key considerations for renewable energy development which are location, scale, potential impact on wildlife, particularly bats, and the individual and cumulative visual impacts.

9.42 Proposals for turbines in the northern end of the district should consider the impact of development on the setting of the Broads Authority area. The Broads Landscape Character Assessment provides information on the unique character of different areas and their distinct sense of place. It should be considered when assessing the potential impact of development on the setting of Broads Authority area. The Landscape Character Assessment is available online at:

www.broads-authority.gov.uk/planning/planning-policies/landscape-character-assessments

Biodiversity

9.43 Wind turbines, even small turbines, can have an impact on bats and owls. Some bats and owls are protected species and consideration must be given to any impact development may have them. The [Suffolk Biodiversity Information Service](#)¹²⁴ provides guidance and a recommended approach to turbines in Suffolk. The [Barn Owl Trust Wind Turbine Position Statement](#)¹²⁵ recommends that a full Environmental Assessment is undertaken and that turbines are located appropriately in the landscape so they do not pose a

¹²⁴ http://www.suffolkbis.org.uk/planning/bats_and_turbines

¹²⁵ <http://www.barnowltrust.org.uk/wp-content/uploads/Barn-Owl-Trust-Wind-Turbine-Position-Statement-220115.pdf>



hazard to barn owls. The [Bats Conservation Trust](#)¹²⁶ also provides advice on the impact of onshore turbines on bats.

Anaerobic Digestion

9.44 Anaerobic digestion is the process of breaking down organic matter, such as food waste, sewage, manure, fats and oils, and waste from wineries/breweries, to produce gas to be used as fuel. Information on anaerobic digestion is available from:

- [The East Suffolk Sustainable Construction SPD](#)¹²⁷,
- [The Official Information Portal on Anaerobic Digestion](#)¹²⁸, and
- [The Anaerobic Digestion and Bioresources Association](#)¹²⁹.

9.45 Anaerobic digestion plants can vary in size and scale from domestic to commercial scale. The size, scale and energy generation of the plants varies on the amount of material available to be put into the anaerobic digester. Small anaerobic digestion plants, sometimes known as bioelectric micro scale AD plants, that convert animal manure into waste can have energy outputs of between 11-74kw.

9.46 On farms small scale anaerobic digestion plants can convert animal manure into useful biogas and fertilizer. The biogas can generate electricity and heat which can be used on site. The benefits of small-scale anaerobic digestion plants on farms include:

- The system provides 'free' energy,
- Increases a farms self-sufficiency in energy,
- Provides increased protection from changing energy prices,

- Could potentially provide additional income through the sale of energy,
- Makes farms more sustainable and reduces the carbon footprint, and
- Uses existing animal manure/slurry with no need for any other additional crops.

9.47 Larger anaerobic digestion plants can not only generate energy for use on the farm, but also be sized so a percentage of their electricity can be exported.

9.48 The anaerobic digestion plants can produce noise, odour and emissions that could potentially impact the environment. However, in rural areas and on farms these issues can usually be mitigated. Careful consideration should be given to location of plants away from any dwellings.

9.49 An air quality assessment is usually required as part of a planning application. Anyone considering an installation is recommended to discuss proposals at an early stage not only with the Local Authority (including Planning Policy and Environmental Protection Teams), but also with the Environment Agency as most installations will need an exemption, or potentially a Permit to operate.

¹²⁶ <http://www.bats.org.uk/about-bats/threats-to-bats/wind-farms-and-wind-turbines>

¹²⁷ www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Sustainable-Construction-2022/FINAL-Sustainable-Construction-SPD.pdf

¹²⁸ www.biogas-info.co.uk

¹²⁹ adbioresources.org



10 Wastewater Management in Rural Areas

- 10.1 [Anglian Water](#)¹³⁰ is responsible for most of the public sewer system in East Suffolk with property owners usually responsible for any pipes within their property boundary. Some rural areas of East Suffolk are not connected to the public sewer system and existing homes and businesses have septic tanks or domestic sewerage treatment plants. New development in rural areas with no connection to the public sewage system will also need to make private provision for wastewater.

Policy

- 10.2 Installing a new sewerage system, including a replacement system, requires Building Regulation approval and any discharge from the system may require consent from the Environment Agency. The requirements that new sewerage systems must meet are set out in [Building Regulations Approved Document H: Drainage and waste disposal](#).¹³¹
- 10.3 The East Suffolk Building Control Team provides information and guidance on Building Regulations including:
- [Pre-application advice](#) prior to submitting a building regulation application, and
 - Guidance on [Treatment plants and septic tanks](#).¹³²
- 10.4 The Government’s Planning Practice Guidance provides information on [Water Supply, wastewater and water quality](#).¹³³ The Guidance includes information on the planning considerations. The guidance notes that where

connection to a public sewer is not feasible a “package sewage treatment plant must comply with the general binding rules, or a permit will be required. A package sewage treatment plant must be used if the treated effluent is being discharged to surface water.”

- 10.5 In many cases it may be possible to install a new sewage treatment plant without planning permission. However, when they are proposed in some front or rear gardens or outside of a domestic curtilage, then planning permission may be required. In most circumstances the Environment Agency won’t permit new or replacement septic tanks and therefore modern domestic sewage treatment plants are required. Planning considerations for these, when permission is required are largely limited to the visual impact of any above ground element, odour and noise impacts on neighbouring properties from the electrically powered mechanical elements. Local Plan policy does not specifically cover the issue of sewage waste management. However, waste management is a practical necessity and when carrying out any form of development consideration should be given to the impact on the amenities of neighbouring properties. The key Local Plan policies relating to residential amenity are:

Suffolk Coastal Local Plan policies:

- [Policy SCLP9.2 Sustainable Construction](#)
- [Policy SCLP9.7 Holistic Water Management](#)
- [Policy SCLP10.3 Environmental Quality](#)
- [Policy SCLP11.1: Design Quality](#)
- [Policy SCLP11.2: Residential Amenity – including noise](#)

¹³⁰ <http://www.anglianwater.co.uk/services/sewers-and-drains/>

¹³¹ <http://www.gov.uk/government/publications/drainage-and-waste-disposal-approved-document-h>

¹³² <http://www.eastsuffolk.gov.uk/assets/Planning/Building-Control/Common-projects-guidance/Treatment-plants-and-septic-tanks.pdf>

¹³³ <http://www.gov.uk/guidance/water-supply-wastewater-and-water-quality>

**Waveney Local Plan policies:**

- [Policy WLP8.28 Sustainable Construction](#)
- [Policy WLP8.29: Design](#)

10.6 The planning policies require development to “protect the amenity of the wider environment, neighbouring uses and provide a good standard of amenity for future occupiers of the proposed development.”

10.7 The East Suffolk [Validation Guidance](#) requires a Foul Drainage Assessment to be submitted with planning applications for new buildings, conversions, and significant extensions. Where the development is not connecting to the existing public sewer a more detailed assessment is required.

Policy Guidance

10.8 Topics covered in this chapter:

- Existing septic tanks and treatment plants
- New Sewage Treatment Plants

Existing Septic Tanks and Treatment Plants

10.9 Cesspits store raw wastewater which must be regularly emptied. Septic tanks store sewage with the liquid fraction treated both in the tank, and as it soaks into the ground. Since 2020, drainage into a watercourse or surface water has not been allowed and upgrades to existing systems has been required. Septic tanks must now drain into a drainage field, which is a network of pipes surrounded in pea shingle or gravel. Bacteria grow on the gravel and help to clean the wastewater produced from a septic tank prior

to it entering the ground. Installation of new cesspits and septic tanks is mostly discouraged in favour of domestic sewage treatment plants.

10.10 The Department for Environment, Food & Rural Affairs (DEFRA) and the Environment Agency has issued information for households and businesses that have septic tanks and small sewage treatment plants in [Your Sewage – Your Environment](#).¹³⁴

New Sewage Treatment Plants

10.11 The legal requirements for private wastewater management systems are known as General Binding Rules. Government information and guidance on General Binding Rules are available here:

- [Septic tanks and sewage treatment plants: what you need to do and](#).¹³⁵
- [General binding rules: small sewage discharge to a surface water](#).¹³⁶

10.12 The General Binding Rules govern existing and new discharges into the ground and surface water. The rules cover the quantity of discharge and the types of discharge permitted. They set out the minimum distance a private sewerage system is permitted from a public sewer. They also specify the minimum distance discharge fields are permitted from special areas of conservation, special protection areas, Ramsar wetlands sites and biological sites of special scientific interest.

10.13 Regulations require a treatment plant to be at least 10m from a building and the sewage treatment plant drainage fields to be located:

- 2m from any neighbouring boundary,

¹³⁴ <https://consult.defra.gov.uk/water/reform-regulatory-system-small-sewage-discharges/results/your-sewage-your-environment-leaflet-july-2015.pdf>

¹³⁵ <http://www.gov.uk/permits-you-need-for-septic-tanks>

¹³⁶ <http://www.gov.uk/guidance/general-binding-rules-small-sewage-discharge-to-a-surface-water#overview>



- At least 10m from any watercourse,
- At least 15m from any building,
- 50m from wells, boreholes, springs, reservoirs or other water sources, and
- Away from roads, driveways and paved areas.

10.14 The Environment Agency is responsible for issuing permits and for the enforcement of the General Binding Rules.

10.15 Most replacement/new private wastewater management systems being installed in East Suffolk are small treatment plants. In an effort to improve water quality, sewage treatment plants are only permitted where connection to a public sewer is not feasible, a treatment plant poses a risk to a designed site, and it is in accordance with Approved Document H of the Building Regulations.¹³⁷

10.16 An appropriate wastewater system is a practical necessity for a development to be viable. Where a connection to the public sewer is not possible, early consideration should be given to accommodating a private wastewater system that will not have a detrimental impact on neighbouring properties. The size, location and impact of a treatment plant should be an intrinsic part of the design of a proposed new development.

10.17 Replacement/new treatment plants, even small domestic treatment plants can cause issues that negatively impact on the residential amenity of neighbouring properties. Issues can include vibrations from pumps, noise and odour. It is therefore essential that both a good design process takes place to sensibly locate any blower unit (containing a compressor/motor), and that such units are bought and installed with adequate noise insulation

and vibration isolation. Low noise units should be selected where possible at the outset. If blower units are located close to neighbours, and windows of habitable rooms then acoustic screening or enclosure could be necessary to protect residential amenity.

10.18 Local Plan policies do not cover sewage waste and the associated systems needed to dispose of the waste. However, Planning Policies SCLP11.1, SCLP11.2 and WLP8.29 require neighbouring residential amenity to be protected and this includes noise, disturbance and odour that can result from new treatment plants.

¹³⁷ <http://www.gov.uk/government/publications/drainage-and-waste-disposal-approved-document-h>

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