



Cabinet

Members are invited to a **Meeting of the Cabinet** to be held in the Deben Conference Room, East Suffolk House, Melton, on **Tuesday, 9 April 2024 at 6.00pm.**

This meeting will be broadcast to the public via the East Suffolk YouTube Channel at <https://youtube.com/live/KUy4dDWkl1o?feature=share>.

Members:

Councillor Caroline Topping (Leader of the Council), Councillor David Beavan (Deputy Leader and Housing), Councillor Paul Ashton (Corporate Services – Digital, Customer Services, HR and Assets), Councillor Jan Candy (Community Health), Councillor Tom Daly (Energy and Climate Change), Councillor Toby Hammond (Economic Development and Transport), Councillor Vince Langdon-Morris (Resources and Value for Money), Councillor Rachel Smith-Lyte (The Environment), Councillor Sarah Whitelock (Communities, Leisure and Tourism), Councillor Kay Yule (Planning and Coastal Management)

An Agenda is set out below.

Part One – Open to the Public

Pages

- | | | |
|----------|--|--------------|
| 1 | Apologies for Absence
To receive apologies for absence, if any. | |
| 2 | Declarations of Interest
Members and Officers are invited to make any declarations of interests, and the nature of that interest, that they may have in relation to items on the Agenda and are also reminded to make any declarations at any stage during the meeting if it becomes apparent that this may be required when a particular item or issue is considered. | |
| 3 | Announcements
To receive any announcements. | |
| 4 | Minutes
To confirm as a correct record the minutes of the meeting held on 5 March 2024. | 1 - 8 |

KEY DECISIONS

- | | | |
|----------|---|----------------|
| 5 | Rural Development Supplementary Planning Document ES/1912
Report of the Cabinet Member with responsibility for Planning and Coastal Management. | 9 - 257 |
|----------|---|----------------|


Part One – Open to the Public		Pages
6	East Suffolk Property Investments Limited – Revised Business Case ES/1913 Report of the Cabinet Member with responsibility for Resources and Value for Money and the Deputy Leader and Cabinet Member with responsibility for Housing.	258 - 265
7	Acquisition of new Refuse Collection Vehicles ES/1920 Report of the Cabinet Member with responsibility for the Environment.	266 - 274
NON-KEY DECISION		
8	Housing Regulation – Quarterly Update ES/1914 Report of the Deputy Leader and Cabinet Member with responsibility for Housing.	275 - 287
9	Exempt/Confidential Item It is recommended that under Section 100A(4) of the Local Government Act 1972 (as amended) the public be excluded from the meeting for the following item of business on the grounds that it involves the likely disclosure of exempt information as defined in Paragraphs 2 and 3 of Part 1 of Schedule 12A of the Act.	

Part Two – Exempt/Confidential	Pages
---------------------------------------	--------------

KEY DECISION

- | | | |
|-----------|---|--|
| 10 | Procurement of Temporary Accommodation to enable the Council to fulfil its duties under Housing and Homelessness Legislation <ul style="list-style-type: none"> • Information that is likely to reveal the identity of an individual. • Information relating to the financial or business affairs of any particular person (including the authority holding that information). | |
|-----------|---|--|

Close



Chris Bally, Chief Executive

If you require this document in large print, audio or Braille or in a different language, please contact the Democratic Services Team on 01502 523521 or email: democraticservices@eastsoffolk.gov.uk

Filming, Videoing, Photography and Audio Recording at Council Meetings

The Council, members of the public and press may record / film / photograph or broadcast this meeting when the public and press are not lawfully excluded.

The Council cannot guarantee public seating areas will not be filmed or recorded. By entering the Conference Room and sitting in the public seating area, those present will be deemed to have consented to the possible use of filmed images and sound recordings. If you do not wish to be recorded, please speak to a member of the Democratic Services team at the earliest opportunity.



The national Charter and Charter Plus Awards for Elected Member Development

East Suffolk Council is committed to achieving excellence in elected member development

www.local.gov.uk/Community-Leadership

Unconfirmed



Minutes of a Meeting of the **Cabinet** held in the Conference Room, Riverside, Lowestoft on **Tuesday, 05 March 2024 at 6:00 PM**

Members of the Cabinet present:

Councillor Paul Ashton, Councillor David Beavan, Councillor Toby Hammond, Councillor Vince Langdon-Morris, Councillor Rachel Smith-Lyte, Councillor Caroline Topping, Councillor Sarah Whitelock, Councillor Kay Yule

Other Members present:

Councillor Paul Ashdown, Councillor Peter Byatt, Councillor Mike Deacon, Councillor Alan Green, Councillor Lee Reeves, Councillor Craig Rivett

Officers present: Chris Bally (Chief Executive), Chris Bing (Head of Legal and Democratic Services), Kerry Blair (Head of Operations), Kate Blakemore (Strategic Director), Sarah Davis (Democratic Services Officer), Lorraine Fitch (Democratic Services Manager), Andy Jarvis (Strategic Director), Nick Khan (Strategic Director), Andrea McMillan (Planning Manager - Policy, Delivery and Specialist Services), Laura Mundy (Principal Planner (Policy and Delivery)), Philip Ridley (Head of Planning and Coastal Management), Alli Stone (Democratic Services Officer)

1 Apologies for Absence

Apologies for absence were received from Councillor Candy and Councillor Daly.

2 Declarations of Interest

There were no Declarations of Interest.

3 Announcements

There were no announcements from the Leader or Cabinet Members

4 Minutes

On the proposition of Councillor Langdon-Morris, seconded by Councillor Hammond it was unanimously

RESOLVED

That the minutes of the meeting held on 6 February 2024 be agreed as a correct record and signed by the Chair.

5 Statutory five-year review assessment of the East Suffolk Council - Waveney Local Plan and Local Development Scheme update

Councillor Yule, the Cabinet Member with responsibility for Planning and Coastal Management introduced report ES/1869 which related to the Statutory five-year review assessment of the East Suffolk Council - Waveney Local Plan and Local Development Scheme update.

The report presented to Cabinet addressed three key matters:

1. The five year statutory review assessment of the Waveney Local Plan.
2. The recommendation arising from the Overview and Scrutiny Committee meetings of 19th October and 16th November 2023 to “Review the Strategic Housing Market Assessment and Local Plan documents in relation to affordable housing supply sooner rather than later and include environmental sustainability.”
3. The Written Ministerial Statement published on 19th December 2023, setting out an expectation for all local planning authorities to have an up to date local plan timetable in place within 12 weeks.

Councillor Yule summarised the Waveney Local Plan review assessment as provided in published report. Councillor Yule advised that the review needed be undertaken by 20 March 2024.

Both of the Council’s Local Plans were informed by evidence contained in the Strategic Housing Market Assessment.

Both plans have policies that required a percentage of affordable housing to be delivered on sites of 10 or more dwellings (Suffolk Coastal Local Plan) or 11 or more dwellings (Waveney Local Plan).

Over the local plan periods to date, 639 affordable homes have been delivered in the Suffolk Coastal Local Plan area (since April 2018) and 554 have been delivered in the Waveney Local Plan area (since April 2014).

Whilst it was not currently considered necessary to review the Strategic Housing Marketing Assessment (SHMA) or Local Plans, the section of the report on the Local Development Scheme and indicative future Local Plan timetable addresses this recommendation.

The Chair invited Councillor Deacon, Chair of the Overview and Scrutiny Committee, to summarise the recommendations from that Committee.

Councillor Deacon outlined that the Overview and Scrutiny Committee recently undertook two reviews with the aim of making recommendations to Cabinet to increase the provision of affordable and social housing in East Suffolk.

One recommendation was that the SHMA and Local Plans were reviewed sooner rather than later, and it was suggested that Cabinet consider that particular recommendation within report ES/1869.

As part of the Review of Affordable Housing Planning Requirements, the Overview and Scrutiny Committee had sought the views of local developers. Councillor Deacon thanked all who participated and drew attention to comments, concerns and suggestions raised, as detailed in paragraphs 1.3 to 1.9 and Appendix A of report ES/1870 on the agenda. The feedback helped form the Committee's view that the SHMA and Local Plans need to be reviewed as soon as possible, given the changed landscape since the documents were approved, and Cabinet was asked to give this due consideration.

There were no questions from Cabinet Members

Councillor Rivett referred to recommendation (5) concerning amendments and commented that this provided reassurance to all Councillors that there were control measures in place to mitigate any significant changes being made after a Cabinet decision was made. Councillor Rivett stated that he hoped that this would be applied to more decisions going forward to provide clarity on amendments.

Councillor Byatt queried the timescales regarding the additional supplementary planning documents, in particular custom and self-build so there could be a full and comprehensive plan.

The Planning Manager - (Policy, Delivery and Specialist Services) advised that the Rural Development Supplementary Planning Document was going to be brought to Cabinet in April for adoption. The Custom and Self Build Housing Supplementary Planning Document was going back to the Local Plan Working Group at its next meeting and then to Cabinet in May. The Healthy Environments document would also be going to the Local Plan Working Group in April and then to Cabinet in June 2024.

Councillor Langdon-Morris noted he had some questions and climate related concerns which he was working through with Councillor Yule and would continue to do so outside of the meeting.

There were no further questions.

On the proposition of Councillor Yule, seconded by Councillor Whitelock it was by majority vote

RESOLVED

That Cabinet:-

1. Approves the content and conclusions of the review assessment of the East Suffolk Council – Waveney Local Plan (Appendix A of this report) and agrees that the Local Plan is effective and that a local plan update is not necessary.
2. Agrees that the review assessment of the East Suffolk Council – Waveney Local Plan (Appendix A of this report) be published.
3. Notes the information contained in this report relating to the forthcoming planning reforms.
4. Approves the Local Development Scheme (Appendix B of this report) and agrees to its publication, replacing the Council’s existing Local Development Schemes, and that this will take effect from Friday 15th March 2024.
5. Authorises the Head of Planning and Coastal Management, in consultation with the Cabinet Member with responsibility for Planning and Coastal Management, to make any presentational and typographical changes to the Waveney Local Plan review assessment and the Local Development Scheme prior to them being published.
6. Notes the recommendations of the Overview and Scrutiny Committee meetings of 19th October 2023 and 16th November 2023 (as set out in paragraph 2.38 of this report), and that the approval of the Local Development Scheme (Appendix B) setting out an indicative timeline for a future local plan review responds to this recommendation.

6 Reports from the Overview & Scrutiny Committee

Councillor Deacon, Chair of the Overview and Scrutiny Committee, introduced report ES/1860 which set out recommendations following the recent Review of Affordable Housing Planning Requirements and the Review of the Provision of Social Housing in East Suffolk.

Councillor Deacon stated that as he had previously mentioned under the previous item, the Committee undertook the reviews to see if there was anything that could be recommended to Cabinet to increase the supply of affordable and social housing for those residents that need it.

The two reviews identified the challenges to providing more housing, many of which were outside the Council’s control. The Committee felt, however, that their recommendations would help to increase the availability of affordable and social housing in East Suffolk. Cabinet was being asked to give due consideration to the report and the Cabinet Member with responsibility for Housing’s response to the recommendations.

There were no questions from Cabinet Members.

There were no questions from other members present.

The Chair thanked the Overview and Scrutiny Committee for the work they had done.

On the proposition of Councillor Beavan, seconded by Councillor Yule it was unanimously

RESOLVED

That Cabinet

1. Explore innovative and creative ways to provide more affordable, efficient and environmentally friendly housing within East Suffolk.
2. Review the Strategic Housing Market Assessment and Local Plan documents in relation to affordable housing supply sooner rather than later and include environmental sustainability.
3. Increase the target for providing Council housing stock from 50 to 100 units per annum.
4. Lobby Government on changing the Right to Buy Scheme so that a higher percentage of the receipts can be made available to supply more housing stock.

7 Simpler Recycling - Food Collections

Councillor Smith-Lyte, Cabinet Member with responsibility for the Environment, introduced report ES/1871 which related to the Simpler Recycling - Food Collections. The purpose of the report was to provide Cabinet with information on the nationwide Simpler Recycling requirements required by March 2026.

Councillor Smith-Lyte summarised the background and purpose of the report. In December 2018 Government published its Resources and Waste Strategy (RAWS). This was the first national review of waste policy for over 10 years, and aimed to reduce waste, improve recycling and support the development of a circular economy.

The recently published Simpler Recycling Policy included nationwide requirements to improve recycling under the Environment Act 2021. East Suffolk Council already met many of the requirements but would need to provide new or alternative services by March 2026, including recycling glass bottles, jars, and cartons. Food waste collections would need to be provided on a weekly basis.

The report focused on the new food waste collection service and should be seen as a step forward in the Council's strategic objective, focusing on the reduction and the re-use of waste materials. The food collection service would be for all food, both cooked and uncooked. Residents would be asked to separate their food waste into a Council provided food bin with a caddy for use inside the home.

Councillor Yule stated she supported the recommendations and was concerned about the amount of contaminated recycling that was noted and queried if there would be any training with Town / Parish Councils regarding the new processes coming into effect.

Councillor Smith-Lyte anticipated there would be instruction with the roll out into the community.

The Head of Operations added that the Communications Lead had been engaging with Suffolk colleagues and a communication plan would be implemented. He added that food collections should be fairly straight forward. The Suffolk Waste Partnership had considered how residents would understand the processes and collections. East Suffolk Council had been part of the discussions, and this would be revisited when it came back Cabinet and the recycling component was reviewed.

Councillor Topping added that the document did state there should be liaison with community groups and outlined there would be upcoming roadshows showcasing the work of East Suffolk Council and that refuse, recycling and general waste collection would be part of that work.

Councillor Langdon-Morris was curious to understand more about the exploration of carbon offsets or carbon credits and how carbon footprint could be measured.

Councillor Hammond added that there was a variety of complex carbon calculations around biogenic waste and the generation of methane. There was some work being undertaken with Officers and specialist consultants on the Beccles incinerator development. There was an opportunity to join up some work.

Councillor Ashton added that he was concerned to read that half of all food waste was in packaging and in date when thrown away.

Councillor Smith-Lyte responded with her concern regarding in-date unopened waste and stated it was an area she would like to address. Councillor Smith-Lyte added that there would have to be some consultation around the roll out of the work, which could include having representatives on the vehicles out in the community. Councillor Smith-Lyte was also open to other suggestions from colleagues on how this could be addressed.

Councillor Topping stated that waste might not all be household and could also be coming from supermarkets or stores where through contamination or other means which resulted in disposal.

Councillor Whitelock stated that wormeries could be considered and highlighted personal experience of their success.

Councillor Rivett asked if there were any timelines for communication and training to be provided to residents and Members.

Councillor Smith-Lyte responded to state there would be, however she did not have the information at the present time.

The Head of Operations followed up that timelines for communication and training would be picked up with the Communications Team.

Councillor Topping outlined that there was ongoing work with Suffolk Public Sector Leaders and she would share any updates as they become available.

Councillor Rivett sought clarification that collections would be curb side. Councillor Smith-Lyte confirmed that this was the case.

Councillor Byatt added that it was a complex issue with a deadline of March 2026. He encouraged exploring what other areas outside the UK have in place along with other Councils more locally.

Councillor Byatt stated that developers should be engaged regarding the inclusion of essential collection points on housing sites. Councillor Byatt highlighted that supermarkets should be engaged too and consideration given to utilising open spaces and community composting. The importance of the issue was discussed further along with the need to positively engage residents and consider residents who did not have access to gardens or open spaces.

Councillor Smith-Lyte thanked Councillor Byatt for this points and ambition. There had been exploration outside the UK which included Finland and the Netherlands. Engaging with supermarkets about better labelling and information to consumers was another area which required exploration. Consideration to options for people living in flats / apartments and community space was also needed.

Councillor Topping added that the earlier meeting of the Shareholders Reference Group (SRG) touched on the matter in question and East Suffolk Services were aware of the changes and were getting prepared for them.

On the proposition of Councillor Smith-Lyte, seconded by Councillor Whitelock it was unanimously

RESOLVED

That Cabinet

1. Approve the introduction of a weekly separate food waste collection by 31 March 2026 to meet new statutory requirements.
2. Give delegated Authority to the Head of Operations, in consultation with the Cabinet Member for The Environment to agree and authorise a suitable procurement strategy, individually and/or collectively with partner councils, to deliver the necessary infrastructure in terms of vehicles, bins and material processing through New Burdens funding.
3. Agree to exploring cross-border service provision for food waste collections and implement if it is practicable and would deliver savings

8 Exempt/Confidential Items

On the proposition of Councillor Hammond, seconded by Councillor Yule it was unanimously

RESOLVED

That under Section 100A(4) of the Local Government Act 1972 (as amended) the public be excluded from the meeting for the following item of business on the grounds that it involves the likely disclosure of exempt information as defined in Paragraph 3 of Part 1 of Schedule 12A of the Act.

9 Exempt Minutes

On the proposition of Councillor Ashton, seconded by Councillor Hammond it was unanimously

RESOLVED

That the exempt minutes of the meeting held on 6 February 2024 be agreed as a correct record and signed by the Chair.

The meeting concluded at 6:46pm

.....
Chair



Committee	Cabinet
Date	09/04/2024
Subject	Rural Development Supplementary Planning Document
Cabinet Member	Councillor Kay Yule Cabinet Member with responsibility for Planning and Coastal Management
Report Author(s)	Ruth Bishop Senior Planner (Policy and Delivery) ruth.bishop@eastsoffolk.gov.uk
Head of Service	Philip Ridley Head of Planning and Coastal Management Philip.ridley@eastsoffolk.gov.uk
Director	Nick Khan Strategic Director Nick.khan@eastsoffolk.gov.uk

Key Decision?	Yes
Is the report Open or Exempt?	OPEN

Category of Exempt Information and reason why it is NOT in the public interest to disclose the exempt information.	Not applicable
---	----------------

Purpose/Summary

The purpose of this report is to recommend the adoption of the Rural Development Supplementary Planning Document (SPD). The SPD supports the implementation of policies relating to rural development in the East Suffolk Council – Suffolk Coastal Local Plan and East Suffolk Council – Waveney Local Plan. The SPD provides guidance on a range of topics including rural worker dwellings, rural annexes, rural residential curtilage expansion, rural building and barn conversions, economic development, equestrian development, tourism accommodation, small scale renewable energy generation, and wastewater management in rural areas.

Recommendation(s)

That Cabinet:

1. Adopts the Rural Development Supplementary Planning Document.
2. Authorises the Head of Planning and Coastal Management, in consultation with the Cabinet Member for Planning and Coastal Management, to make any presentational or typographical amendments to the Rural Development Supplementary Planning Document prior to it being published.

Strategic plan

How does this proposal support Our Direction 2028?

Environmental Impact

The SPD in particular supports the aim to ‘Support, promote and implement green tech’ in Chapter 9 ‘Small Scale Renewable Energy Generation’ which provides support and guidance on the benefits from generation on-site renewable or low carbon energy in rural areas. This includes information on roof mounted PV, heat pumps, biomass, wind turbines, and anaerobic digestion.

The SPD also supports the aim to ‘Preserve and maintain the district’s beauty and heritage’ by providing guidance on the impact of development on the natural landscape, historic environment and cultural heritage. Particular consideration is given in Chapter 5 Rural Buildings and Barn Conversions which include guidance on converting traditional barns and buildings.

Sustainable Housing

The SPD in particular supports the aim to ‘Deliver the right housing base on our communities’ need’ by providing guidance on residential development. Chapter 2 Rural Worker Dwellings, Chapter 3 Rural Annexes and Chapter 5 Rural Buildings and Barn Conversions supports the delivery of the right accommodation in the right location.

Thriving Economy

The SPD, particularly chapter 6 Economic Development, aims to ‘Ensure Local Plans work for local people’ by the implementation of policies relating to rural development in the East Suffolk Council – Suffolk Coastal Local Plan and East Suffolk Council – Waveney Local Plan.

	<p>The SPD also 'Support responsible tourism and visitor economy' by providing guidance on economic and tourist development. Chapter 6 Economic Development and Chapter 8 Tourism Accommodation supports the delivery of appropriate tourist accommodation.</p>
--	---

Justification for recommendations

1 Background

- 1.1 The Council has two adopted Local Plans: the East Suffolk Council – Waveney Local Plan (March 2019) and the East Suffolk Council – Suffolk Coastal Local Plan (September 2020). These Local Plans both contain a number of policies relating to rural development.
- 1.2 There is no current Supplementary Planning Document (SPD) relating to the type of guidance provided in the new Rural Development SPD for either the former Suffolk Coastal area or former Waveney area.
- 1.3 The document has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and the Planning and Compulsory Purchase Act 2004.
- 1.4 The preparation of the SPD has been undertaken through an officer steering group, which included officers from Planning Policy and Delivery, Development Management, Design and Heritage, Ecology, and Landscape and Arboriculture. The preparation of the SPD has been overseen by the Council's Local Plan Working Group.
- 1.5 The Town and Country Planning (Local Plans) (England) Regulations 2012 (as amended) require the Council to undertake consultation to inform the production of the SPD and also, as a minimum, requires that the draft document is published for four weeks and that during that time it is available on the Council's website and that hard copies are available for inspection in the Council's offices.
- 1.6 The Council's approach to engagement in the preparation of SPDs is set out in the Statement of Community Involvement. The Council engages in two rounds of consultation with external stakeholders, and the public. The consultations were advertised on the Council's website, through social media posts and a press release. Consultation documents were available on the Council's website and in libraries and at the Council's Customer Service Centres.
- 1.7 The first consultation was an initial consultation to inform the scope and content of the SPD. The initial consultation was carried out between 1st February to 16th March 2023. The second consultation was on the Draft Rural Development SPD and the consultation ran from 15th November 2023 until 10th January 2024.
- 1.8 Under the Environmental Assessment of Plans and Programmes Regulations 2004 screening was carried out on the draft SPD to determine whether a full Strategic Environmental Assessment would be required. The screening concluded that this was not required. The Strategic Environmental Assessment Screening Opinion is appended to this report (Appendix D).
- 1.9 Habitat Regulations Assessment screening was also undertaken which concluded that implementation of the SPD would not lead to likely significant effects on protected Habitat sites and that it is therefore not considered necessary to undertake an Appropriate Assessment. The Habitat Regulations Assessment Screening Statement is appended to this report (Appendix E).

2 Introduction

- 2.1 Planning policies on rural development issues are set out in the adopted Local Plans. The two adopted local plans are the East Suffolk Council – Suffolk Coastal Local Plan (September 2020) and the East Suffolk Council – Waveney Local Plan (March 2019).
- 2.2 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. SPDs provide valuable guidance to support the implementation of the Local Plans. As an SPD, the 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.
- 2.3 The guidance in the SPD addresses matters that regularly arise in development management and will assist officers, applicants, Members and consultees. The SPD also provides guidance on General Permitted Development Rights, particularly Class Q Prior Approval applications for barn conversions. The guidance should improve the quality of applications submitted and schemes proposed.
- 2.4 The Rural Development SPD covers the following topics which each have a chapter in the SPD:
- Rural worker dwellings,
 - Rural annexes,
 - Rural residential curtilage expansion,
 - Rural buildings and barn conversions,
 - Economic development,
 - Equestrian development,
 - Tourism accommodation,
 - Small scale renewable energy generation, and
 - Wastewater management in rural areas.
- 2.5 The SPD was subject to two rounds of consultation during its preparation. Details of the consultations carried out are contained in the Consultation Statement (Appendix B of this report). The first was an initial consultation to inform the scope and content of the SPD. The initial consultation was carried out between 1st February to 16th March 2023. In total 26 individuals and organisations responded to the consultation. The responses received to the initial stage of consultation were used to inform preparation of a draft document which was subsequently subject to a public consultation.
- 2.6 The Draft Rural Development SPD consultation ran between 15th November 2023 and 10th January 2024. The consultation was advertised on the Council’s website, as well as on social media. 1,779 emails and 28 letters were sent out at the start of the consultation to the consultees on the planning policy mailing list which includes Town and Parish Councils, individuals, and organisations including those who were previously contacted or responded to the informal stage of the consultation. As part of the consultation an online briefing session was held for Town and Parish Councils, and another one held for East Suffolk Councillors. In total, 14 individuals and organisations responded to the consultation. Between them they made 40 comments.
- 2.7 The main themes of the comments received are summarised below; however, many of the comments covered very specific matters and it is not possible to summarise all of them here

in a succinct manner. The full consultation responses have been published on the Council's consultation website (see - <https://eastsuffolk.inconsult.uk/DraftRuralDevelopment23/consultationHome>) and summarised in the appended Consultation Statement along with details of how each comment has been responded to (Appendix B).

2.8 The main issues raised through the consultation are listed below.

General/ Introduction –

- Areas of Outstanding Natural Beauty (AONB) are now known as National Landscapes and references need updating. References to NPPF need changing to Dec 2023 version. References to Suffolk Parking Guidance need updating to recently published 2023 version.
- References to the Broads Authority requested throughout the document.
- Aldeburgh Town Council wants protection for 'curtilage' of around AONB, setting of the town and its countryside. The Town Council also expressed concern about developers not implementing landscape schemes.

Chapter 2 –

- Kettleburgh Parish Council expressed concern temporary accommodation can become permanent.

Chapter 3 –

- 2 respondents disagree with the characteristics of an annex e.g. shared utilities, distance from original dwelling, independent living, etc

Chapter 5 –

- Request for text to clarify that dependence on the private car doesn't preclude barns from conversion.
- Request for information on how an application with a barn extension will be viewed.
- Additional text requested regarding enhancing setting of LBs, protection for LBs by use of traditional design and techniques, and appropriate use of buildings.
- Request to clarify that flooding from all sources must be considered and to include links to LLFA.
- Overall Historic England is pleased with advice on rural buildings and barn conversions.

Chapter 6 –

- Request for guidance regarding large farming estates diversifying.
- Bentwaters Park Ltd objected to elements of the guidance that covers matters associated with former airfields being used for employment.
- Request for references to the Broads, biodiversity, and security lighting.
- Request for development to minimise dust and maintain air quality.

Chapter 8 –

- Desire for all year-round tourism to be balanced with holiday conditions.
- Request for text that provides advice for existing development with parking and transport issues that could be addressed through planning.

Chapter 9 –

- Request for references to Broads and their Landscape Character Assessment.
- Request for more information on heat pumps, biomass and wind turbines.

2.9 Changes have been made to address many of the comments received from respondents during the consultation. Changes include:

General / Introduction comments –

- Updated references to National Landscapes, NPPF, and Suffolk Parking Guidance.
- Added in references to the Broad Authority area.

Chapter 5 –

- Added new paragraph 5.4 regarding barns typically being dependent on the private car for transport and this not precluding them from conversion.
- New text in para. 5.7 and 5.9 added regarding listed buildings.
- New para. 5.21 added to emphasise that rural buildings should be converted with minimal alteration.
- Requirement for a Heritage Statement added to para. 5.38.
- New para. 5.59 added requesting justification for extensions to rural building and barn conversion to be provided in the Design and Access Statement or Heritage Statement.
- Reference in para. 5.103 to the government’s consultation on permitted development rights updated.
- Reference to Suffolk County Council as the Lead Local Flood Authority (LLFA) and link to their website added to para. 5.126.
- References to Flood Risk Assessments being required to consider any site at risk of flooding from any source added throughout Chapter 5.

Chapter 6 -

- Sentence requiring security lighting in economic developments to be justified added to para. 6.16.
- Reference to Suffolk County Council as the Lead Local Flood Authority (LLFA) added to para. 6.18.
- Sentence requiring security lighting to be justified added to para. 6.30.
- Sentence requesting new proposals minimize dust and maintain air quality added to para. 6.32.
- Text noting that junctions should be designed and located so that hedgerows do not need to be removed added to para. 6.39.
- Information regarding development on former airfields expanded and updated in para. 6.99 – 6.103. Amendments address objections raised by Bentwater.
- A requirement for a Heritage Statement and reference to Suffolk Historic Environment Record added to para. 6.104.
- Additional text added to para. 6.118 - 6.19 regarding farm diversification in response to comment from Benacre Estate.

Chapter 8 –

- New para. 8.48 added regarding the impact of smoke and noise from tourist accommodation. Text in line with comments received from the Environmental Protection Officer.

Chapter 9 –

- Text in para. 9.11 updated in line with comments received from the Environmental Protection Officer.
- Additional information on heat pumps added in para. 9.28 and 9.29.
- Additional information on biomass boilers added in para. 9.34.
- Text noting that wind turbines can cause noise added to para. 9.38.
- New paragraph 9.42 added regarding to wind turbines and the Broads Authority areas with a link to the Broads Landscape Character Assessment.
- Requirement for air quality assessments added to para. 9.49.

2.10 Changes have also been made to update the document, improve the clarity and understanding of the guidance, and improve the format for adoption. Changes include:

General / Introduction comments –

- Changes have been made to address typographical and grammatical errors and provide clarity.

Chapter 3 –

- Amendments have been made to ensure the chapter provides clear guidance that is not open to interpretation, addresses common issues and removed any misinterpretation that annexes can be constructed under permitted development rights. These include:
 - Paragraph 3.1, bullet point three removed.
 - Former para. 3.8 removed.
 - Flow chart in Chapter 3 removed at the request of Development Management.
 - Text from the Permitted development right for householders: technical guidance (2019) added.
 - Information on Class E Permitted Development Rights removed.
 - Section on applying for planning permission for the conversion of a building to an annexe.

Chapter 4 –

- References to domestic curtilage changed to residential curtilage for consistency.
- Amendments have been made to ensure the chapter provides clear guidance that is not open to interpretation, addresses common issues. These include:
 - In para. 4.8 removed second bullet referencing land previously used by the occupant of the dwelling.
 - In para. 4.9 removed references to residential curtilage changing over time and lack of limits on size.
 - Removed sections on permitted development rights, what can residential curtilage be and what can residential curtilage not be.
 - In para. 4.1 removed second sentence regarding residential curtilage and settlement boundaries.
 - Image on boundary treatments changed.
 - In section on permitted development (PD) right and planning conditions text on PD removed.

Chapter 6 -

- Two paragraphs replaced with para. 6.24. Text provided by the Council's Ecologist and provides updated information on biodiversity.

Chapter 8 –

- Small alteration to the text in Chapter 8 following legal advice on the terms tourist accommodation and holiday accommodation.
- Wording of para.8.53 - 8.55 improved post consultation based on officer conversations.

3 Proposal

- 3.1 The Rural Development SPD contains comprehensive planning guidance on a range of rural issues within a single document. It has been prepared to support the implementation of policies contained in the adopted Local Plans, as well as being consistent with Government policy, principally that contained within the National Planning Policy Framework.
- 3.2 On adoption the Rural Development SPD will be a material consideration in the determination of planning applications.

4 Financial implications

- 4.1 The production and adoption of the SPD is covered by the existing budget of the Planning Policy and Delivery Team. As an SPD, it cannot and does not introduce any additional financial requirements upon developers beyond the Local Plan policy requirements.

5 Legal implications

- 5.1 The SPD has been produced in accordance with the Town and Country Planning (Local Plans) (England) Regulations 2012 (as amended).
- 5.2 An Equality Impact Assessment Screening opinion was produced to meet the requirements of the Equality Act 2010 (Appendix C). The SPD has been subject to a Strategic Environmental Assessment Screening Opinion in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (Appendix D). It has also been subject to a Habitats Regulation Assessment Screening Statement, in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) (Appendix E).

6 Risk implications

- 6.1 There are no risks envisaged in relation to the implementation of the recommendations.

7 Options

- 7.1 Adopt the Rural Development SPD meaning the Council has an up-to-date SPD to guide the implementation of the sustainable construction planning policies.
- 7.2 An alternative option would be to not adopt the SPD and continue to implement the planning policies without the additional guidance. However, this would be a missed opportunity to provide further clarification on the requirements of the policies, and address some of the frequently raised matters that come about through the development management process, and so ultimately support effective implementation of the relevant Local Plan policies.

8 Recommendations

1. Cabinet adopts the Rural Development Supplementary Planning Document.
2. That the Head of Planning and Coastal Management, in consultation with the Cabinet Member for Planning and Coastal Management, is authorised to make any presentational or typographical amendments to the Rural Development Supplementary Planning Document prior to it being published.

9 Reason for Recommendations

- 9.1 Adoption of the Rural Development SPD will provide up to date guidance to assist with the implementation of the Council's Local Plan policies which relate to rural development.

10 Conclusions/Next Steps

- 10.1 If Cabinet accepts the recommendations, the Rural Development Supplementary Planning Document will be published in accordance with Regulations and the Statement of Community Involvement and become a material consideration when determining planning applications.

Areas of consideration comments

Section 151 Officer comments:

No further comments.

Monitoring Officer comments:

No further comments

Equality, Diversity and Inclusion/EQIA:

An Equality Impact Assessment was undertaken as part of the preparation of the SPD (Appendix C). The EQIA (Appendix C) screening exercise shows that the SPD will not negatively impact upon any protected group or those experiencing socio-economic deprivation. Therefore, a full EQIA assessment is not considered necessary.

For the purpose of preparing this report, an Equality Impact Assessment has been undertaken the outcome of which is that the decision will not have equalities impacts. The assessment reference is EQIA592343640.

Safeguarding:

Not applicable.

Crime and Disorder:

Not applicable.

Corporate Services implications:

Legal Services' officers have been consulted during the preparation of the SPD assessment and the report, but there are no identified impacts on the service arising from agreement to the recommendations in this report.

Residents and Businesses consultation/consideration:

The SPD was subject to two rounds of public consultation during its preparation. The first consultation was carried out between 1st February to 16th March 2023 and the second ran from 15th November 2023 and 10th January 2024. A Town and Parish Council session was held over Microsoft Teams on 8th December 2023 in which the draft SPD was presented, and attendees had the opportunity to ask questions.

In total 26 individuals and organisations responded to the first consultation and 14 to the second consultation.

Details of the consultations carried out are contained in the Consultation Statement (Appendix B of this report).

Appendices:

Appendix A	Rural Development Supplementary Planning Document
Appendix B	Consultation Statement
Appendix C	Equality Impact Assessment Screening Opinion (November 2023) (produced to accompany consultation on Draft SPD).
Appendix D	Strategic Environmental Assessment Screening Opinion (November 2023) (produced to accompany consultation on Draft SPD).
Appendix E	Habitat Regulations Assessment Screening Statement (November 2023) (produce to accompany consultation on Draft SPD).

Background reference papers:

Date	Type	Available From
2019	East Suffolk Council – Waveney Local Plan	Adopted-Waveney-Local-Plan-including-Erratum.pdf (eastsuffolk.gov.uk)
2020	East Suffolk Council – Suffolk Coastal Local Plan	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
2023	National Planning Policy Framework	National Planning Policy Framework (publishing.service.gov.uk)
2021	Statement of Community Involvement	Statement-of-Community-Involvement.pdf (eastsuffolk.gov.uk)
2024	DASH EqIA EQIA592343640	Available on request from Ruth.Bishop@eastsuffolk.gov.uk


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



Contents

1	Introduction	1
2	Rural Worker Dwellings	5
3	Rural Annexes	12
4	Rural Residential Curtilage Expansion	19
5	Rural Buildings and Barn Conversions	24
6	Economic Development.....	54
7	Equestrian Development	81
8	Tourism Accommodation.....	87
9	Small Scale Renewable Energy Generation	99
10	Wastewater Management in Rural Areas	107



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

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

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



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

¹⁷

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

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



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

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

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.



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.

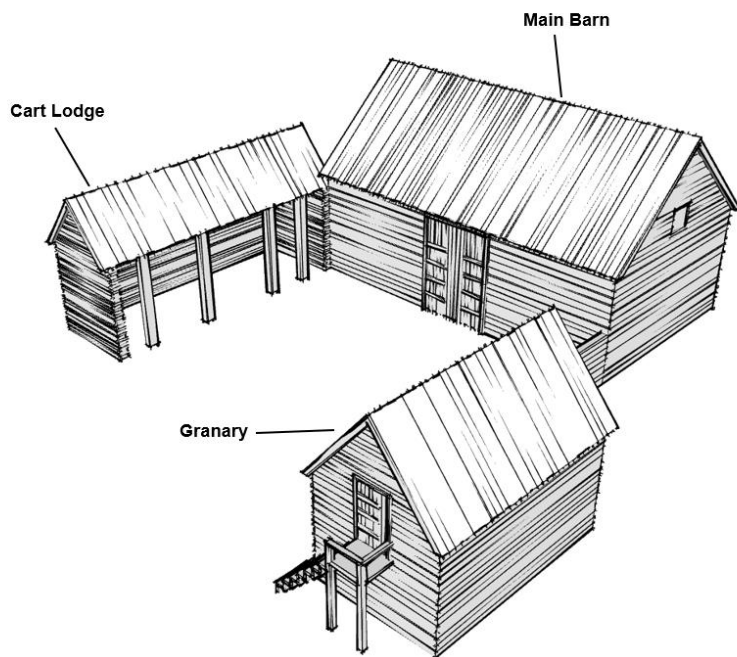


Figure 1 A redundant group of farm buildings as existing. Showing a main barn, cart lodge and granary.

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.

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

- 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

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)

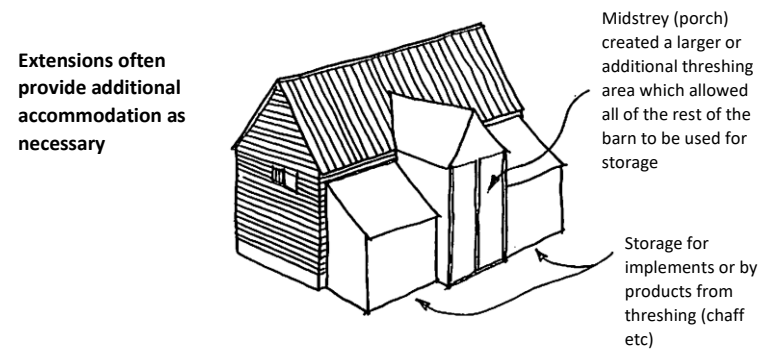
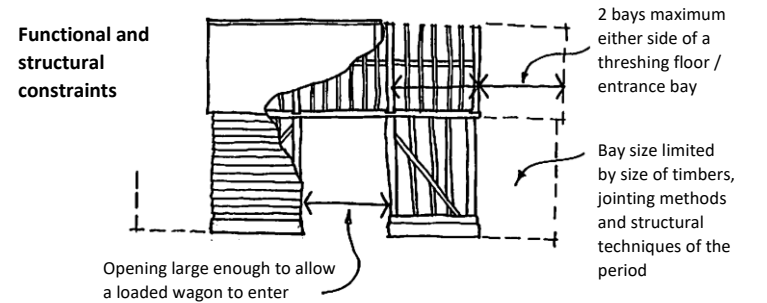
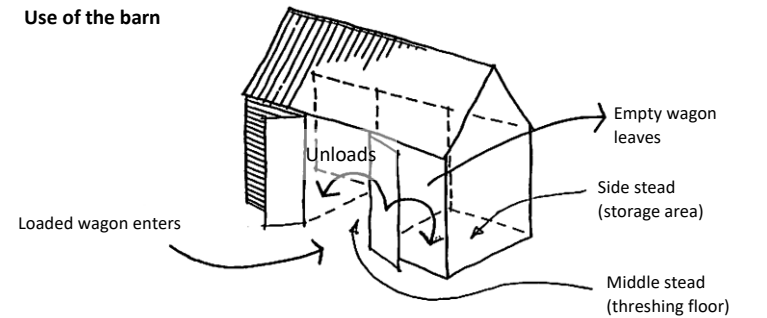


Figure 2 Diagram showing typical structure and use of traditional barn



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

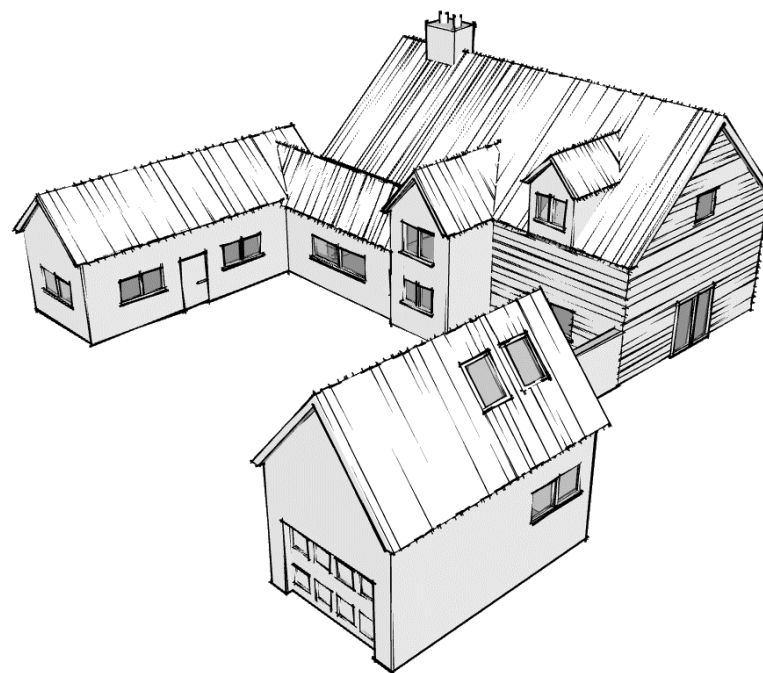


Figure 3 A proposal for conversion which is unacceptable due to the loss of agricultural character and overly domestic appearance

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

www.eastsuffolk.gov.uk/Planning

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 vehicles 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 buildings 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/uk/si/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/ukxi/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/ukxi/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/uk/si/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 Strategy⁶², Suffolk Streets Design Guide Website⁶³, Local Transport Note 1/20⁶⁴ and Manual for Streets 2⁶⁵.

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, Iketchall St Margret

- 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 hangers and several buildings remain.⁸⁰ The site has developed with three new aircraft hangers, café, places to stay and significant parts of the site converted to an industrial estate.

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



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.



- 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

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

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



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 website.⁸⁵
- 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

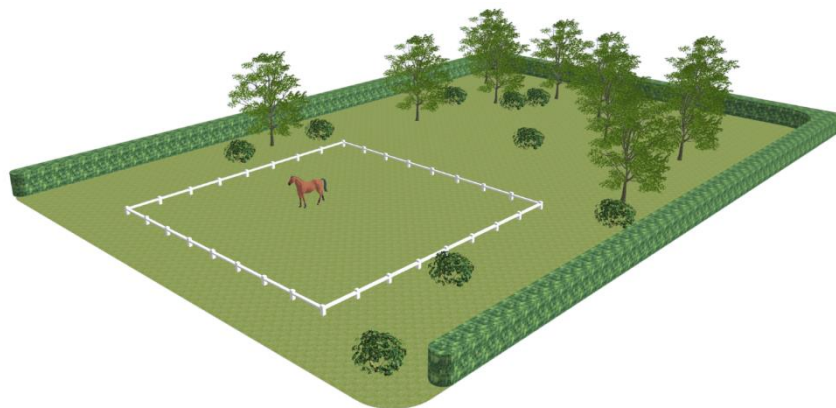


Figure 5 Example of a manège that is permitted development

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.

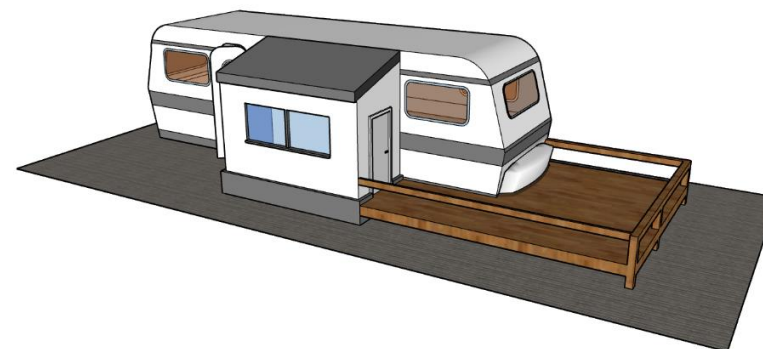


Figure 6 Example of an extension to a caravan rendering that is no longer Caravan Act compliant

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.

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

- 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.



- 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.

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>

- 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](#)

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

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

- 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



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

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

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

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](#)

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

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>

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,

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>

Write to us



East Suffolk Council
Planning Policy and Delivery Team
Riverside, 4 Canning Road,
Lowestoft, NR33 0EQ

Call us



Planning Policy and Delivery Team (Local Plans)
01394 444557

Development Management (Planning Applications)
01394 444832

Email us



Planning Policy and Delivery Team (Local Plans)
planningpolicy@eastsoffolk.gov.uk

Development Management (Planning Applications)
planning@eastsoffolk.gov.uk

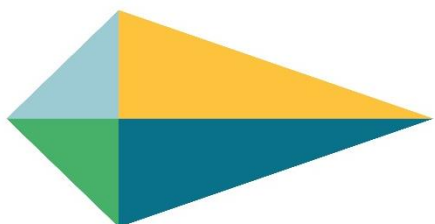
This document is available in alternative formats and in different languages on request. If you need support or assistance to help you read and/or understand this document, please contact the Council using one of the methods above.

www.eastsuffolk.gov.uk/Planning

Consultation Statement

Rural Development Supplementary Planning Document

February 2024



EASTSUFFOLK
COUNCIL

Contents

1 Introduction	3
2. Who was consulted?	3
2.1 Initial consultation	4
2.2 Consultation on the Draft SPD	4
3. How were they consulted?	4
Appendix 1: Initial Consultation – Social Media	7
Appendix 2: Initial Consultation Summary	8
Appendix 3: Initial Consultation Bodies	38
Appendix 4: Draft Consultation Bodies	39
Appendix 5: Draft Consultation Promotion Material	41
Appendix 6: Draft Consultation Responses	45

1 Introduction

The East Suffolk Council Rural Development Supplementary Planning Document (SPD) provides policy implementation guidance for the delivery of key policies of the East Suffolk Council – Waveney Local Plan (2019) and East Suffolk Council – Suffolk Coastal Local Plan (2020) and design guidance for the topic area. The key topic areas of the guidance relate to 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.

This Consultation Statement was first produced to accompany the initial consultation on the proposed scope and content of the Rural Development SPD that was held for six weeks between 1 February and 16 March 2023. The responses to the initial consultation were used to inform the production of the Draft Rural Development SPD. The Draft Rural Development SPD was consulted on for eight weeks between 15 November 2023 and 10 January 2024.

This Consultation Statement has since been updated following the draft consultation on the Draft Rural Development SPD to reflect the consultation responses received during that consultation. This Consultation Statement was produced in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

SPDs 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 website¹. The Council’s approach to engagement in the preparation of SPDs is set out in the Statement of Community Involvement².

2. Who was consulted?

Consultation on the Rural Development Supplementary Planning Document (SPD) was split into two stages: an initial stage that informed the scope and content of the SPD, and a formal stage of consultation that sought views on the draft SPD once the draft version had been produced.

¹ Available at: www.eastsuffolk.gov.uk/localplan.

² Available at: <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/statement-of-community-involvement-and-local-development-scheme/>.

2.1 Initial consultation

The initial consultation was carried out between 1 February and 16 March 2023. The following organisations and groups were consulted during the preparation of the SPD:

- Specific Consultation Bodies
- Neighbouring Authorities
- Town and Parish Councils
- Developers
- Agents
- Architects
- Planning Consultants
- Housing Associations
- Rural, farming and business associations Tourism Groups

The consultation was also made available to the public on the Council's website.

2.2 Consultation on the Draft SPD

Consultation on the Draft SPD was held between 15 November 2023 and 10 January 2024. At the formal stage of consultation, all of those registered on the Council's Local Plan and other Policy Documents mailing list were directly consulted.

A small number of consultees that were not on these mailing lists were contacted directly and invited to respond to the consultation due to their professional expertise in the topic area.

Steps were undertaken to advertise the consultation to others, as set out below.

3. How were they consulted?

There were two stages to the consultation process, which are set out below.

Initial consultation

The initial consultation ran from 1 February and 16 March 2023. An Initial Consultation Document was prepared to provide background information and an overview of the proposed scope and content of the SPD, followed by a five-question questionnaire for respondents to respond to. The consultation documents were made available on the East Suffolk Council website via this webpage:

<https://east Suffolk.inconsult.uk/ruraldevelopment2023/consultationHome>.

The consultation was advertised on the Council’s website, as well as through social media posts on the Council’s social media accounts. Specific consultees, both internal and external, that had professional expertise in areas relevant to the topic areas of the SPD were contacted at the initial consultation stage and invited to provide their feedback on the proposed scope and content of the SPD. Town and Parish Councils, elected members, and other organisations referred to above were notified directly by email, with a small number were notified by letter. All consultation respondents were also given the option to submit written responses to Planning Policy team via email or by post, or to contact the team with any questions. A press release was not made at initial consultation stage, as this is generally not considered to be appropriate at initial scope and content consultation stage. Similarly, hard copies of the Initial Consultation Document were not made available at local libraries or East Suffolk Service Centres as this is generally not considered to be appropriate at initial scope and content consultation stage.

In total 26 individuals and organisations responded to the consultation, which is a consistent number of respondents to previous SPD consultations the Council has conducted. Full copies of the responses have been published on the Council’s website at:

<https://eastsuffolk.inconsult.uk/ruraldevelopment2023/listRespondents>.

Consultation on the Draft SPD

The consultation of the draft SPD ran for eight weeks between 15 November 2023 and 10 January 2024; an additional two weeks of consultation time was added to the standard six weeks due to the consultation period running over the festive period.

Both a downloadable PDF version of the document and a consultation portal version of the document was made available; the consultation portal document allowed respondents to comment directly on the section of the document that their comment related to. All consultation respondents were also given the option to submit written responses to Planning Policy team via email or by post, or to contact the team with any questions.

Town and Parish Councils, elected members, and other organisations referred to above were notified directly by email. Specific external consultees that had professional expertise in areas relevant to the topic areas of the SPD were contacted at the draft consultation stage and invited to provide their feedback on the proposed detailed guidance included in the draft SPD.

Town and Parish Councils were sent a letter and two copies of a poster that advertised the consultation in the post, so that these could be displayed in their ward areas. Their email also included an electronic copy of the poster so that Town and Parish Councils could print additional copies if they wanted to.

The consultation was advertised on the Council's website, as well as through the Council's social media posts; social media posts were released in approximately two-week intervals over the duration of the consultation.

The consultation documents were made available on the East Suffolk Council website via the below page:

<https://eastsuffolk.inconsult.uk/Drafruraldevelopment23/consultationHome>.

Hard copies of the draft SPD were also made available at the following libraries and East Suffolk Customer Service Centre locations for the duration of the draft SPD consultation:

- Aldeburgh Library, Victoria Road, Aldeburgh, IP15 5EG
- Beccles Library, Blyburgate, Beccles, NR34 9TB
- Bungay Community Library, Wharton Street, Bungay, NR35 1EL
- Felixstowe Library, Crescent Road, Felixstowe, IP11 7BY
- Framlingham Library, The Old Court House, Bridge Street, Framlingham, IP13 9AJ
- Halesworth Library, Bridge Street, Halesworth, IP19 8AD
- Kesgrave Library, Kinsey House, Kays Close, Kesgrave, IP5 2HL
- Kessingland, Marram Green, Hall Road, Kessingland, NR33 7AH
- Leiston Library, Old Post Office Square, Main Street, Leiston, IP16 4ER
- Lowestoft Library, Clapham Road South, Lowestoft, NR32 1DR
- Marina Centre, Lowestoft, NR32 1HH
- Oulton Broad Library, 92 Bridge Road, Oulton Broad, NR32 3LR
- Rushmere Library, Rushmere Sports Pavilion, Sidegate Avenue, Ipswich, IP4 JJ
- Saxmundham Library, County Offices, Street Farm Road, Saxmundham, IP17 1AL
- Southwold Library, Old Hospital Hub, Field Stile Road, IP18 6LD
- Wickham Market Library Resource Centre, Chapel Lane, Wickham Market, IP13 0SD
- Woodbridge Library, New Street, Woodbridge, IP12 1DT

In total 14 individuals and organisations responded to the consultation. Between them they made 40 comments.

Full copies of the responses have been published on the Council's website at

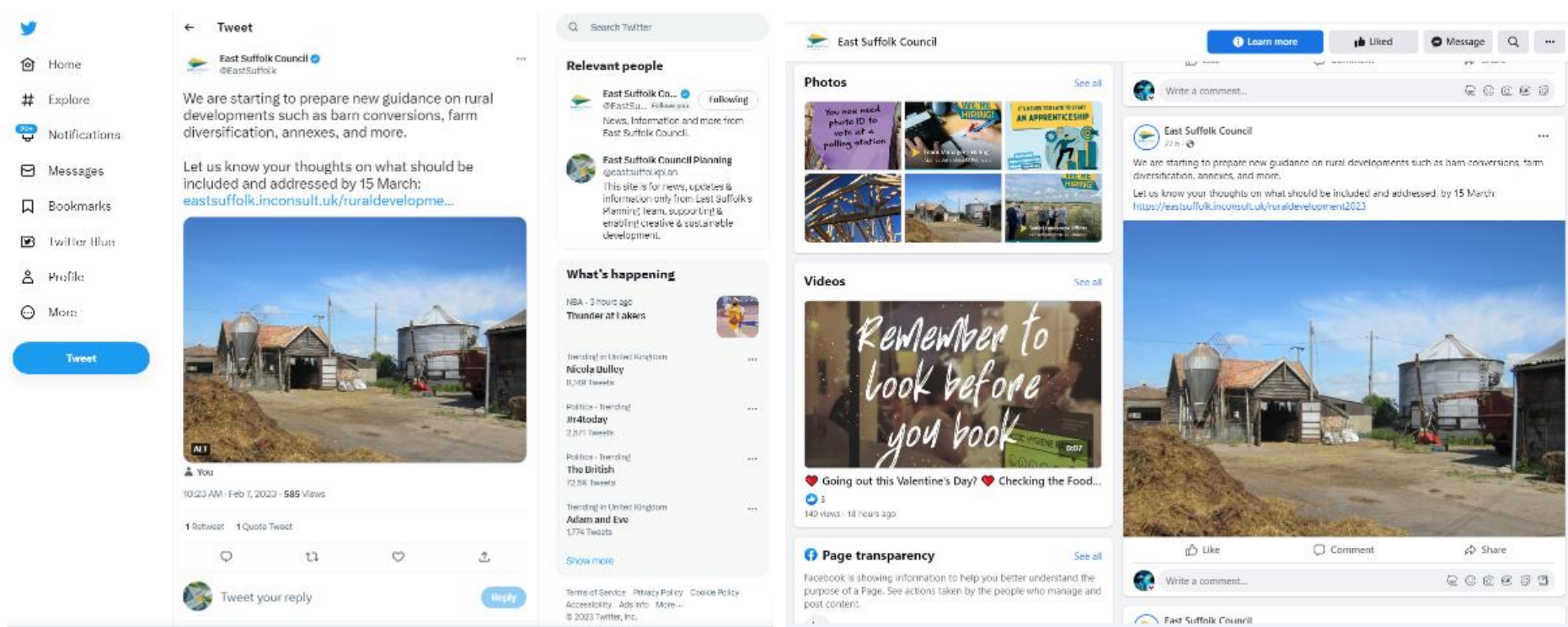
<https://eastsuffolk.inconsult.uk/Drafruraldevelopment23/listResponses>

Appendix 1: Initial Consultation – Social Media

The table below lists the social media posts made on the Council’s social media accounts during the initial consultation.

Initial consultation – Feb 2023 – Mar 2023

Twitter / X	Facebook
01/02/2023	01/02/2023



Appendix 2: Initial Consultation Summary

The table below lists the main issues raised in the consultation responses, the Council’s response and how they informed the preparation of the document.

1. Do you consider the proposed content of the Rural Development Supplementary Planning Document to be appropriate?

Respondent Name	Comment	Council Response	Action
Barnby parish council (Ian Bond)	> Yes However emphasis needs to be given to protected areas of particular value to wildlife, peoples recreation, SSSI's, Ramsar's and areas in open countryside which impact an areas charactor etc. Planners must have the ability to act when such areas are threatened whereas currently guidance appears to be so restrictive that planning officers will freely admit that their hands are tied.	The comment is noted. It should be noted that an SPD cannot create new policy but can only clarify and expand upon existing policy. This SPD is focused on providing advice and guidance relating to development. Where appropriate the SPD will include reference to designing developments sensitively regarding wildlife and landscape character. Parish councils can provide additional guidance on protecting wildlife and landscape character through the adoption of neighbourhood plans.	Reference to designing sensitively in regard to landscape character is included in chapter 2 Rural Workers Dwellings. Regard for the surrounding landscape is overall strategy No.3 for designing an annexe. A section on the Impact on the landscape and biodiversity is included in chapter 4 Rural Residential Curtilage Expansion. Sections on making a positive contribution to the landscape, landscape setting including boundary treatment and parking, the natural environment, and Habitats Directive and Habitats Regulations are included in chapter 5 Rural Buildings and Barn Conversions. A section on biodiversity protection is included in Chapter 6 Economic Development. A section on wildlife and landscape impact is included in chapter 7 Equestrian Development.

Bromeswell Parish Council (Verity Brown)	> Yes	Comment noted	No action
Bromeswell Parish Council (Verity Brown)	> Yes	Comment noted	No action
Brooks Leney (John Pearce)	> Yes	Comment noted	No action
Bromeswell Parish Council (Pamela Hembra)	> Yes	Comment noted	No action
Colin Hedgley	> Yes	Comment noted	No action
Framlingham Town Council (Neil Williamson)	> Yes	Comment noted	No action
Geoff Wakeling	> Yes	Comment noted	No action
Glenn Coles	> Yes	Comment noted	No action
Ipswich Borough Council (sally minns)	> Yes	Comment noted	No action
james mallinder	> Yes	Comment noted	No action
Jean Ellinor	> Yes More involvement of Parish Councils who know the character and culture of their village - not all villages are the same, even if they have the same size of population or number of houses !	We will consult Town and Parish Councils on the next stage of the development of this SPD which is the consultation on the draft SPD due to take place Autumn 2023. We will take into consideration all comments received. Parish councils can provide additional guidance on character through the adoption of neighbourhood plans.	Parish and town councils will be contacted direct regarding the next stage of the SPD. Public consultation on the Draft SPD to be held in Autumn 2023
Jean Ellinor	> Yes	Comment noted	No action
Jill Pass	> Yes	Comment noted	No action

Juliet Blaxland (Juliet Blaxland)	> Yes	Comment noted	No action
Melton Parish Council (Pip Alder)	> Yes	Comment noted	No action
Suffolk Coast & Heaths and Dedham Vale AONBs (Simon Amstutz)	> Yes While the RD SPD covers many of the areas of development in the rural area it does not appear to reference that much of rural East Suffolk is located in a nationally designated Area of Outstanding Natural Beauty (AONB). Public bodies and statutory undertakers have a duty of regard to the purpose of the AONB when decision making (to conserve and enhance natural beauty)	The comment is noted. The project will look to provide guidance on landscape and protected designation considerations in relation to the topics covered in the Rural Development SPD. It should be noted that an SPD cannot create new policy but can only clarify and expand upon existing policy.	The SPD includes reference to Local Plan policy SCLP6.3 Tourism Development in chapter 6 Economic Development and Chapter Tourism. Reference to the AONB is made in Chapter 6 in sections on external lighting, noise, and additional community, cultural and tourism benefits. In chapter 6 there is a specific section on AONB and heritage coast. References to the AONB are also included in Chapter 7 Equestrian Development, Chapter 8 Tourism and Chapter 9 Small Scale Renewable Energy Generation.
The Benacre Company (Beverley Buggs)	> No It would be helpful if the SPD made specific reference to development within and relocated from Coastal Change Management Areas (and thereby included reference to Waveney Local Plan 2019 policies WLP8.25 and WLP8.25), recognising the important contribution that rural development in all areas, including within these areas, can (and needs to) make to economic development in the area.	The Coastal Adaptation SPD addresses development within the Coastal Change Management Areas (CCMA).	The Rural Development SPD aims to address a range of development issues that are common in East Suffolk. It was not considered necessary to provide guidance on development in the CCMA.
Ubbeston Parish Council (Julie Collett)	> Yes	Comment noted	No action

2. Are any specific elements of the Local Plan policies relating specifically to rural matters that you consider require additional guidance in the Rural Development Supplementary Planning Document?

Respondent Name	Comment	Council Response	Action
Barnby parish council (Ian Bond)	> Yes The views of residents, the councils concerned and planning officers should be given greater weight regarding development outside recognised parish and town boundaries and in open countryside. Comprehensive explanation should be required and made public when planning decisions are published.	All Planning Applications must be assessed against national, local and neighbourhood planning policies. All material objections are given weight when determining a planning application. An officer's report is published online for each planning application, the report details the recommendation for refusal or approval together with an explanation. We will consult Town and Parish Councils on the next stage of the development of this SPD which is the consultation on the draft SPD due to take place Autumn 2023. We will take into consideration all comments received.	No action required, but this comment relates more to development management process so will be brought to the attention of that department. Parish and town councils will be consulted at the next stage of the SPD.
Bromeswell Parish Council (Verity Brown)	> No	Comment noted	No action
Bromeswell Parish Council (Verity Brown)	> Yes 1. Conversion of farm buildings to holiday lets: this has the potential to cause loss of habitat to native wildlife, especially barn owls. There will also be an increase in traffic, particularly from the Deben Peninsula, on a road system what is already not fit for purpose and under considerable strain from HGVs and residential traffic. 2. Conversion of farm buildings to expensive homes that locals will be unable to afford:	1. The comment is noted and guidance on the protection of appropriate wildlife for farm building conversion will be included. 2. Policy SCLP5.8 and WLP8.1 set housing mix requiring a mix of sizes and types. Where the conversion results in a single unit a mix is less achievable. The rural SPD cannot enforce additional affordable units if not supported by the housing mix policies.	1. Guidance on the protection of wildlife during farm building conversions is included Chapter 5 in sections on Natural Environment, and Habitats Directive and Habitats Regulations. 2. No action as covered in the housing mix policies. 3. Guidance on wildlife protection and traffic management has been included where appropriate.

	<p>there is already a shortage of local affordable houses. The addition of more expensive properties will push up local prices making it even more difficult for young people, in particular, to be able to afford to live locally.</p> <p>3. Conversion of farm buildings/new build for business premises: These have the potential too to destroy native wildlife, and add to the already problematic road congestion.</p> <p>Overall, the increase in light, noise and traffic pollution needs to be seriously considered in terms of the effects on residents and native wildlife and specific guidance should be included in the proposed SPD</p>	<p>3. It is agreed that the SPD should provide guidance on biodiversity preservation and impact to the highway where appropriate.</p>	
<p>Brooks Leney (John Pearce)</p>	<p>> Yes</p> <p>Conversion – care should be taken to not stifle innovative designs and the SPD should not be overly prescriptive. The prior approval process has been set out in the planning practice guidance and is well-established, so the SPD should be careful not to introduce new ‘interpretations of this process.</p> <p>Rural workers dwellings – a wider definition of a rural worker may be appropriate to allow for workers in industries, such as tourism are able to be accommodated at, or near to their place of work. This would reduce the need to travel to the workplace, provide better security for guests through a permanent presence on-site, and improve employment prospects through provision of subsidised accommodation. The ability to provide</p>	<p>Conversion - The guidance will encourage a high standard of design suitable to its location and will not aim to reduce innovation where it makes a positive contribution. The SPD will provide guidance to the existing legislation and policy and will not create new policy.</p> <p>Rural Workers Dwellings – What constitutes a rural worker suitable for a rural worker dwelling will be explored within the SPD. However, the requirement for the worker to live on site should be based on a functional need and is subject to a rigorous criterion. The SPD will provide guidance, but it cannot lower the threshold to where a rural worker dwelling is required.</p>	<p>Conversion - Guidance relating to conversion has been drafted to ensure design is of a high quality, appropriate to its location, but does not stifle innovation. Guidance is provided in Chapter 5 of the SPD.</p> <p>Rural Workers Dwellings – Guidance on what constitutes a rural worker dwelling has been included in Chapter 2 of the SPD.</p>

	<p>housing for rural workers would also benefit through reducing the impact on local housing stock. Within some rural business, multiple dwellings may be required for rural workers due to the scale of the operation.</p> <p>Farm Diversification/Economic Development – include ‘training; within the opportunities to help support upskilling the local workforce through providing facilities for training programmes.</p> <p>Tourism – Clarity in respect of what constitutes “medium and larger scale sites where commercial, recreational or entertainment facilities are provided” would be useful.</p>	<p>Farm Diversification/Economic Development –The Suffolk Coastal supporting policy text lists educational facilities as an example of farm diversification. The guidance within the Economic Development chapter will provide guidance applicable to educational facilities.</p> <p>Tourism - Agreed, whilst the definition is clear with the Waveney policy WLP8.15, clarity can be given to policy SCLP6.5 of the Suffolk Coastal Local Plan.</p>	<p>Farm Diversification/Economic Development – Guidance for development has been included in chapter 6.</p> <p>Tourism – The policy defines what constitutes medium and/or large scale in the Waveney Local Plan, this definition is not included in the Suffolk Coastal Local Plan so is expanded upon in chapter 8 of the SPD.</p>
Charsfield Parish Council (Pamela Hembra)	<p>> Yes</p> <p>Consider the utilisation of rural bodies of water for leisure such as fishing or even if large enough more noisy pursuits. With the exception of the Broads, which are excluded as they have their own planning authority, there are bodies of water elsewhere in rural Suffolk.</p> <p>Note some diversifications can have an effect over quite a large distance if they are noise producing eg clay pigeon shooting.</p>	<p>The Rural Development SPD aims to address a range of development issues that are common in East Suffolk. The use of bodies of water features for leisure purposes as part of farm diversification is not a form of common development that requires planning permission that warranted further detailed guidance.</p> <p>It is recognised that some activities produce noise and this will be a consideration in determining any planning application.</p>	<p>The SPD does not provide guidance on water leisure activities. The SPD focuses on common forms of development in East Suffolk which would benefit from further details guidance.</p>
Colin Hedgley	<p>> Yes</p> <p>See question 5</p>	<p>Answer detailed in question 5</p>	<p>No Action</p>
Framlingham Town Council	<p>> Yes</p>		

<p>(Neil Williamson)</p>	<p>Guidance most particularly to commercial developments to adopt solar or wind power and the use of electric charging points – the lack of which in rural areas is a barrier in achieving net zero carbon emissions.</p>	<p>The Sustainable Construction SPD provides information to renewable energy projects and the Rural Development SPD will not seek to replicate this work, however additional guidance can be included.</p>	<p>A chapter on renewable energy has been included.</p>
<p>Geoff Wakeling</p>	<p>> Yes Dwellings for rural workers need to have further guidance on what meets criteria with a clear framework for both applicants and planners to follow.</p> <p>It is simply not good enough to assume there is sufficient nearby housing for rural workers in agricultural or forestry. Living costs have soared, appropriate properties are lacking and the very fabric of a farm means they require land, and therefore are NOT within easy distances of towns and villages.</p> <p>Decades of development means that much land no longer has the traditional farmhouse as this has been sold and turned into residential or holiday accommodation. The volatile nature of farming also means many coming into the industry simply do not have the means to buy or even rent close by, making their farming business either virtually impossible or a physical and mental drain. High living overheads make starting a farm business extremely difficult whereas being granted rural dwelling allows otherwise expensive costs to be funnelled directly into the business.</p>	<p>Agreed, the Rural SPD will aim to provide clear guidance to apply to rural worker dwellings.</p> <p>The policy requires existing dwellings in the area to be considered first, but it states that the dwelling must be suitable and available. Guidance could be provided on what constitutes a suitable dwelling.</p> <p>The SPD will provide guidance on the suitability of properties and guidance to how recently sold or converted units are considered when determining a rural dwelling planning application.</p> <p>The Local Plans recognise the value and role that rural worker dwellings have.</p>	<p>Agreed, the Rural SPD provides clear guidance in relation to rural worker dwellings in chapter 2.</p> <p>Guidance has been provided on what constitutes a suitable dwelling for rural workers.</p>

	<p>It is extremely important to give weight to a number of factors when determining dwellings for rural workers;</p> <ol style="list-style-type: none"> 1. Livestock welfare 2. Crop security 3. Financial needs 4. Site security - both physical and bio 	<p>These factors will be considered in the SPD in what constitutes a functional need.</p>	
Glenn Coles	<p>> Yes</p> <p>The use of Backland or large gardens should be encouraged as this would bring a lot more properties into the small rural communities, without taking further agricultural land out of production, the small amount of infill allowed, is not enough to supply the needs of local residents, most now when downsizing end up moving due to insufficient housing stock.</p>	<p>New build infill development is guided by the Housing in Clusters and Small Scale Residential Development in the Countryside SPD. The Rural SPD will not look to replicate this work although it will be referenced where appropriate.</p>	<p>No action required.</p>
Ipswich Borough Council (sally minns)	<p>> Yes</p> <p>the Cross boundary development site known as Humber Doucey Lane should be referred to and that there may be other such sites coming forward.</p> <p>Cycling and walking and the role of your SPD on this and the Green Trail being developed around the rim of Ipswich</p>	<p>The Rural SPD will not directly provide guidance on policy SCLP12.24. As an allocation it is not a form of development the rural SPD is intending to explore.</p> <p>The role of the cycle and walking within rural development will be referenced where appropriate. The Green Trail is located in Ipswich and doesn't connect to East Suffolk. The East Suffolk and Cycling Strategy identifies numerous opportunities for trail and paths in East Suffolk.</p>	<p>Cycling and Walking has been referenced where appropriate to the rural development policies.</p>
james mallinder	<p>> Yes</p>		

	<p>loss of habit for many of our native species - as traditional commercial buildings are converted to private dwellings and the general lack of control over the purpose of dwellings , often in one or two units they tend to be holiday lets or expensive 2nd homes or principle house</p> <p>Thus their development has little positive impact to the local community</p> <p>how do you break the behaviour of the landowner allowing a traditional built barn to fall into disrepair - erecting a metal and plastic building then claiming that the original barn will only survive if converted to a private home</p>	<p>The comment is noted and guidance on the protection of appropriate wildlife for farm building conversion will be included as part of the SPD.</p> <p>The SPD can only expand upon and guide development in accordance with existing policy. Accordingly, it cannot be used to govern buildings falling into disrepair. Depending on a number of factors a section 215 notice may be more appropriate. Providing guidance on new agricultural buildings was considered, but the majority of new agricultural buildings are built using permitted development rights not planning permission</p>	<p>Guidance on policies WLP8.11 and SCLP5.5 is has been provided in the chapter 5 on Rural Buildings and Barn Conversions.</p>
james mallinder		No text	No Action
Jean Ellinor	> No	Comment noted	No action
Jill Pass	> No	Comment noted	No action
Juliet Blaxland (Juliet Blaxland)	<p>> Yes</p> <p>If a person/client/architect is not familiar with specific rural activities relevant to a planning application (hunt kennels, racing yards, unusual animals (bison etc), shooting etc) perhaps there could be a list of 'people</p>	<p>The SPD's role is to expand and provide guidance on the existing policy and cannot create a list of external consultants that can be privately contacted for advice.</p>	No Action

	to consult' for factual information which might help in the mutual understanding of the problem or need, culturally as well as practically, as sometimes planners seem not to understand anything about , for example, how working stable yard works.	However, the SPD itself will fulfil the role being helpful in understanding the requirements.	
Melton Parish Council (Pip Alder)	> Yes When the SPD discusses questions about the conversion of sites from rural to other employment eg retail industrial touristic, the impact of the change of activity on the road network needs to considered carefully. Turning a rural site surrounded by rural roads into an employment hub possibly generating many HGV movements can change the whole character of an area. Furthermore the impacts of increased traffic upstream and downstream of a development needs to factored into planning decisions.	Agreed, policies WLP8.14 and SCLP4.6 include criterion to ensure that development that converts rural buildings to residential use does not have a significant impact upon highway safety, local roads or the living conditions. The rural SPD provides the opportunity to provide additional guidance here.	Guidance on policies WLP8.14 and SCLP4.6 in relation to highway impact has been provided in chapter 5 in the section on access. The need for access to main road is noted in chapter 6 in the sections on road network and access.
Melton Parish Council (Pip Alder)	> Yes	Comment Noted	No Action
Suffolk Coast & Heaths and Dedham Vale AONBs (Simon Amstutz)	> Yes While noting that Local Plan policies cannot be changed at this stage and the Local Plan makes ref to tourism development in the AONB other types of development can have an impact on the AONB where they are proposed for the AONB or its setting. Additional Guidance on impacts on the AONB and how to avoid, minimise and mitigate them would be welcomed. This could come in the form of an overarching section of the RD	The comment is noted. The project will look to address AONB's in relation to rural tourism accommodation. Policy SCLP6.3 governs tourism development in areas of AONB.	In chapter 8 on tourism the SPD provides guidance and information on AONB criteria.

	SPD (preferred) or all individual LP policies. Ref could be made to AONB produced guidance, eg Use of Colour in design, defined Natural Beauty and Special Qualities document, AONB Partnership Position Statements and soon to be produced Lighting Guidance		
Ubbeston Parish Council (Julie Collett)	> No	Comment Noted	No Action

3. Are there any elements of national policy or aspects of the General Permitted Development Order that you consider require additional guidance in the Rural Development Supplementary Planning Document?

Respondent Name	Comment	Council Response	Action
Barnby parish council (Ian Bond)	> Yes Aspects of permitted development allow for inappropriate developments in unsuitable areas with little or no consideration of the views of local residents and their elected representatives. Examples are known of previous explicit planning conditions and objections appearing to be ignored and applications being permitted as a result. A requirement to clearly and fully justify and explain such decisions would help dispel concerns regarding what are often viewed as "questionable" decisions.	Permitted Development is set out within the government legislation and the SPD cannot change the processes. All Planning Applications must be assessed against national, local and neighbourhood planning policies. All material objections are given weight when determining a planning application. An officer's report is published online for each planning application that details the recommendation for refusal or approval together with an explanation.	No action
Bromeswell Parish Council (Verity Brown)	> No	Comment noted	No action
Bromeswell Parish Council (Verity Brown)	> Yes Please see response above: guidance on preserving native wildlife, minimising noise and light pollution, and ensuring an already over-burdened traffic system is not made worse.	Guidance on these topics will be provided within the rural SPD where appropriate.	Guidance on these topics have been provided within the rural SPD where appropriate.
Brooks Leney (John Pearce)	> No	Comment noted	No action
Charsfield Parish Council (Pamela Hembra)	> No	Comment noted	No action

Colin Hedgley	> Yes Part Q applications. It must be made clearer that the build should be on the footprint of the original building and encroaching over these limits will not be acceptable.	Class Q states that development is not permitted if: 'the development would result in the external dimensions of the building extending beyond the external dimensions of the existing building at any given point; This can be reinforced in the SPD with a section on class Q.	The class Q criteria is emphasised in the section Class Q Prior Approval Development.
Framlingham Town Council (Neil Williamson)	> Yes Permitted Development guidance to include environmental impact assessment as well as guidance on the structural information requirements and the other guidance proposed in the SPD.	Part Q does not necessarily require an EIA. The SPD will look to provide guidance regarding the environment where appropriate. The SPD will look to provide guidance on the structural information required to support a PD prior approval application or a planning application.	Guidance on the Habitats Directive and Habitats Regulations and the need for ecological surveys, and the need for structural information has been included in chapter 5.
Geoff Wakeling	> No	Comment noted	No action
Glenn Coles	> Yes See Above	Comment noted	No action
Ipswich Borough Council (sally minns)	> No	Comment noted	No action
james mallinder	> Yes further information needed do not know	Comment noted	No action
Jean Ellinor	> No	Comment noted	No action
Jill Pass	> No	Comment noted	No action
Juliet Blaxland (Juliet Blaxland)	> Yes Clarity in plain English in fewest number of words possible.	It is agreed that the document should use plain English where possible to make it easy to use.	Use plain English wherever possible.

Melton Parish Council (Pip Alder)	> No	Comment noted	No action
Suffolk Coast & Heaths and Dedham Vale AONBs (Simon Amstutz)	> No Section 85 of the Countryside and Rights of Way Act 2000 notes that public bodies and statutory undertakers have a duty of regard to the purpose of the AONB when decision making (to conserve and enhance natural beauty). As much of East Suffolk is within the nationally designated landscape reference to it should be included in the RD SPD	The comment is noted. The SPD will have due regard to the AONB and provide guidance on development within and close to the AONB where appropriate.	The SPD has included references to the AONB throughout the document where relevant.
Ubbeston Parish Council (Julie Collett)	> No	Comment noted	No action

4. Are you aware of any good practice in existing Supplementary Planning Documents from elsewhere that could be applied in East Suffolk?

Respondent Name	Comment	Council Response	Action
Barnby parish council (Ian Bond)	> No	Comment noted	No action
Bromeswell Parish Council (Verity Brown)	> No	Comment noted	No action
Bromeswell Parish Council (Verity Brown)	> No	Comment noted	No action
Brooks Leney (John Pearce)	> No	Comment noted	No action
Charsfield Parish Council (Pamela Hembra)	> No	Comment noted	No action
Colin Hedgley	> No	Comment noted	No action
Framlingham Town Council (Neil Williamson)	> No	Comment noted	No action
Geoff Wakeling	> No	Comment noted	No action
Glenn Coles	> No	Comment noted	No action
Ipswich Borough Council (sally minns)	> No	Comment noted	No action
james mallinder	> No	Comment noted	No action

Jean Ellinor	> No	Comment noted	No action
Jill Pass	> No	Comment noted	No action
Juliet Blaxland (Juliet Blaxland)	> No	Comment noted	No action
Melton Parish Council (Pip Alder)	> No	Comment noted	No action
Suffolk Coast & Heaths and Dedham Vale AONBs (Simon Amstutz)	<p>> No</p> <p>See joint DPD for Arnside and Silverdale AONB at https://www.arnsidesilverdaleaonb.org.uk/what-we-do/advice/development-plan-document-arnside-silverdale-aonb/ that notes:</p> <p>A dedicated Development Plan Document (DPD) for the whole of the AONB has been prepared jointly by South Lakeland District Council and Lancaster City Council. This plan, which complements the Arnside & Silverdale AONB Management Plan 2019-24, is the first in the country to be prepared in this way to apply policies and allocations across the AONB.</p> <p>The AONB DPD summarises the development and planning considerations for the area by saying that within the Arnside & Silverdale AONB housing, employment, services, infrastructure and other development will be managed to contribute towards meeting the needs of those who live in, work in and visit the area in a way that: conserves and enhances the landscape, the natural beauty, and the special qualities of the AONB; creates vibrant, diverse and sustainable communities with a strong sense of place; and maintains a thriving local economy.</p>	<p>We are grateful to Suffolk Coast & Heaths and Dedham Vale AONBs for their recommendations. The documents will be read, and any lessons learnt incorporated into the Rural Development SPD. However, this SPD aims to address recurring issues experienced in commonly submitted planning applications in East Suffolk.</p>	<p>References to the AONB have been made throughout the SPD and links to Suffolk Coast & Heath and Dedham Vale AONB Guidance for Planning in the AONB and the Management Plan have been included in chapter 8 on Tourism.</p>
Ubbeston Parish Council (Julie Collett)	> No	Comment noted	No action

5. Do you have any other comments for us to consider in drafting the Rural Development Supplementary Planning Document?

Respondent Name	Comment	Council Response	Action
Barnby parish council (Ian Bond)	Whilst there is a need for development, this should be weighed against the potential for damage to the character of an area and the damage to wildlife caused by infringement into rural areas. The establishment of parish and town boundaries was originally aimed at protecting open countryside and the perception is that permitted development is often granted with little or no consideration of these issues.	Permitted development rights are set out in national legislation and not subject to Local Planning Authorities Local Plans and consideration.	No action
Bromeswell Parish Council (Verity Brown)	No, thank you.	Comment noted	No action
Brooks Leney (John Pearce)	No	Comment noted	No action
Colin Hedgley	Much more weight should be given to Parish Council comments, in fact if the PC does not support an application then the planning authority must give very good reasons why it should be overruled.	All Planning Applications must be assessed against national, local and neighbourhood planning policies. All material objections are given weight when determining a planning application. An officer's report is published online for each planning application that details the recommendation for refusal or approval together with an explanation. We will consult Town and Parish Councils on the next stage of the development of this SPD which is the consultation on the	Consult Town and Parish Council on the draft SPD.

		draft SPD due to take place Autumn 2023. We will take into consideration all comments received.	
Felixstowe Town Council (Ash Tadjrishi)	The Town Council welcomed the Initial Consultation on the Rural Development Supplementary Planning Document but do not feel able to add any further comment.	Comment noted	No action
Framlingham Town Council (Neil Williamson)	<p>An emphasis on the use of environmentally friendly materials, including maximum re-use of existing materials in conversions, and, where applicable the use of locally sourced materials in order to reduce the impact of delivery vehicles on local roads and adding to vehicle emissions. Environmental considerations should be at the heart of all planning decisions.</p> <p>The SPD should provide guidance on the incorporation of permitted access paths within Rural Development to encourage the use of the countryside by all.</p>	<p>The Sustainable Construction SPD provides information on environmentally friendly materials, re-use of existing materials and locally sourced materials, but information can also be included in this Rural Development SPD where relevant.</p> <p>Guidance on access in both rural and urban areas is being provided in the Healthy Environment SPD which is under development.</p>	The SPD, particularly in chapter 5 on rural buildings and barn conversions, includes information on environmentally friendly materials, re-use of existing materials and locally sourced materials.
Glenn Coles	When rural properties have very large gardens, these should be encouraged to be used for housing, especially where it doesn't cause spread along the roadways, this would thicken the housing stock rather than a elongating the area.	New residential development is not permitted in the Countryside (outside of settlement boundaries) except where specific policies in the two Local Plans indicate otherwise. The Clusters and Small Scale Residential Development SPD provide guidance on character and appearance.	No action.
Henstead with Hulver Street Parish Council (Colbridge)	Henstead with Hulver Street Parish Council have considered this consultation and have no issues with the proposals.	Comment noted	No action

Ipswich Borough Council (sally minns)	None	Comment noted	No action
james mallinder	<p>yes this document should be user friendly for local residents and parish councils</p> <p>it needs to highlight what aspects are considered to allow those giving comments to be meaningful</p> <p>there is much conflict between local land owners wanting to develop their buildings largely for their own interest with lack of concern in the local community opinion or for that matter what impact these developments have locally</p> <p>increase in traffice . noise . light pollution etc</p> <p>east suffolk needs to support communities not one particular interest</p>	<p>It is agreed that the document should have a user-friendly layout and presentation.</p> <p>The Rural Development SPD is to provide clear guidance on a range of issues which should reduce any ambiguity regarding what types of development are permitted and therefore conflict.</p>	Ensure a user-friendly presentation of the SPD.
Jean Ellinor	Parish councils need to be more involved at the earliest possible stages of planning - especially in small villages where even modest development can have a big impact	Town and Parish Councils are consulted on all Planning Applications. An SPD cannot create new policy but can only clarify and expand upon existing policy. The policies that impact rural development do not require developers to consult with Parish Council prior to submitting planning applications.	No action.
Jill Pass	Re-development in the countryside should be avoided.	Redevelopment can preserve buildings of historic or architecture value, enable farms to diversify and provide economic benefits. The SPD will provide advice and	No action, but guidance will be provided on agricultural 'redevelopment' particularly in relation to barn conversions.

	<p>There is an issue with the 'bypass' techniques used, such as creating a dwelling for holiday purposes then not policing them.</p> <p>I know of 3 properties that are supposed to be holiday only and are all used as permanent residential.</p>	<p>guidance on types of re-developments that are appropriate.</p> <p>Any properties with conditions restricting the use of a dwelling for holiday rental should be reported to East Suffolk Council if they are being used as permanent residences, so that enforcement action can be considered.</p>	<p>Furthermore guidance on the holiday condition in relation to the policies SCLP6.5 and WLP8.15 will be provided.</p>
<p>Juliet Blaxland (Juliet Blaxland)</p>	<p>We need open-mindedness about architectural types, eg 'big tin barns and grain silos' and 'crinkly tin' have been a familiar sight in the rural landscape for at least 50 years, so are therefore part of the rural vernacular as surely as pantiles and timber planks etc. We should cherish our existing traditional and/or listed buildings, but also embrace the possibilities with new types. Green roofs could be encouraged, not only for reasons of blending in, but also for helping the insects and birds etc, ie replacing the land footprint stolen by the building, by putting it back on the roof.</p> <p>STRONG NEGATIVE in rural areas is 'creeping suburbanisation aesthetic', eg please consider rules about non-building elements, specifically: fencing (discourage suburban panel fences and fussy designs, encourage timber post and rails or black metal 'estate fencing'), gates (eg timber 5-bar gates or black metal to suit rural fencing types), drive and track surfaces (gravel, tarmac, farm tracks etc not paving blocks),</p>	<p>It is agreed that there are a variety of rural buildings which no longer serve their original purpose and maybe suitable for conversion.</p> <p>It is agreed that suburban design aesthetics are not necessarily appropriate in rural settings and design guidance is needed.</p>	<p>The chapter on Rural Buildings and Barn Conversions includes advice on converting a variety of rural buildings. The chapter includes information on design and materials with links to the Sustainable Construction SPD.</p>

	<p>language used (eg not a 'driveway' in rural areas!)</p>		
<p>Martlesham Parish Council (Susan Robertson)</p>	<p>Martlesham Council (MC) would like to see rural development which is well designed, and which incorporates sustainable construction methods and greener energy.</p> <p>MC would also like to see reference to the Suffolk Quiet Lanes project, ensuring that rural development continues to preserve these lanes as safe places for people to use for exercise and active forms of travel.</p> <p>Any rural development in Martlesham should provide safe access to the properties and consider the existing problems which occur as a result of heavy traffic already using rural lanes to avoid the A12 and A14 congestion.</p> <p>We would not wish to see rural development which results in increased traffic in rural areas, but we welcome greater connectivity for use by pedestrians and cyclists.</p> <p>When planning for any development in Martlesham, the effect of additional congestion in the retail park should be considered.</p> <p>There should be specific design codes concerning rural development within Special Landscape Areas and AONBs.</p>	<p>The Sustainable Construction SPD provides information on sustainable design and construction, but information can also be included in this Rural Development SPD.</p> <p>It is agreed that the SPD could reference the Suffolk Quiet Lanes project where appropriate and provide guidance on safe access to properties, traffic and pedestrian and cyclist connectivity.</p> <p>It is agreed that developments within Special Landscape Areas and AONB have specific design issues that could be addressed through additional guidance.</p>	<p>The SPD includes information on Sustainable design and construction together with links to the Sustainable Construction SPD.</p> <p>Information on the Suffolk Quiet Lanes project, safe access to properties, traffic and pedestrian and cyclist connectivity has been included where appropriate.</p> <p>The SPD has addressed the specific design issues in Special Landscape Areas and AONB where appropriate.</p>

Melton Parish Council (Pip Alder)	None	Comment noted	No action
Mutford Parish Council (Mrs Colbridge)	Mutford Parish Council suggests that, following an increase in the use of Airbnb and other commercial accommodation brokers for residential property, tighter regulation is required to avoid possible issues with increased traffic and on-road parking in rural areas. Tighter planning enforcement is also required to avoid abuse of rules around self-catering homes changing to a full-time residency.	<p>Whilst it is recognised that this form of development occurs within rural areas it is part of a wider issue covering urban areas, market towns and villages. Accordingly, any guidance addressing this issue may be best located elsewhere.</p> <p>Any properties with conditions restricting the use of a dwelling for holiday rental should be reported to East Suffolk Council if they are being used as permanent residences, so that enforcement action can be considered.</p>	No action
National Trust (Sandra Green)	The scoping document states 'many farmers are also considering opportunities to increase biodiversity or to undertake 're-wilding' projects and in some cases planning permission may be required for such projects' but then does not go on to include these types of projects in the issues for which detailed guidance will be provided, which it would be helpful for the document to include.	<p>It is agreed that the SPD should provide guidance on biodiversity where relevant.</p> <p>The Rural Development SPD aims to address a range of issues arising from built development that are commonly found in planning applications submitted to East Suffolk Council. Re-wilding is not considered to be a common issue that requires additional guidance to provide in this SPD.</p>	Information on Habitats Directive and Habitats Regulation is provided in chapter 5.
Natural England (Sir/Madam)	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of	It is agreed that the SPD should provide guidance on biodiversity where relevant.	Information and guidance has been provided in chapter 5

	<p>present and future generations, thereby contributing to sustainable development. Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.</p> <p>While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment, but may nonetheless have some effects. We therefore do not wish to provide specific comments, but advise you to consider the following issues:</p> <p>Green Infrastructure This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area.</p> <p>The National Planning Policy Framework states that local planning authorities should ‘Take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure’. The Planning Practice Guidance on Green Infrastructure provides more detail on this.</p> <p>Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species</p>	<p>The Rural Development SPD aims to address a range of issues arising from built development that are commonly found in planning applications submitted to East Suffolk Council. Additional information and guidance where related to rural forms of built development could be included.</p>	
--	---	--	--

	<p>to move around, within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities.</p> <p>There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:</p> <ul style="list-style-type: none"> • green roof systems and roof gardens; • green walls to provide insulation or shading and cooling; • new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity). <p>You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.</p> <p>Further information on GI is included within The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "Good Practice</p>		
--	---	--	--

	<p>Guidance for Green Infrastructure and Biodiversity".</p> <p>Biodiversity Enhancement This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.</p> <p>Landscape Enhancement The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might make a positive contribution to the character and functions of the landscape</p>		
--	--	--	--

	<p>through sensitive siting and good design, avoiding unacceptable impacts.</p> <p>For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed to do so, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.</p> <p>Other Design Considerations The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 180).</p> <p>Strategic Environmental Assessment/Habitats Regulations Assessment A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance. Should the plan be amended in a way which significantly affects its impact on the natural</p>		
--	--	--	--

	environment, then, please consult Natural England.		
Suffolk Coast & Heaths and Dedham Vale AONBs (Simon Amstutz)	Thank you for the opportunity to comment	Comment noted	No action
Suffolk Wildlife Trust and Norfolk Wildlife Trust (Ellen Shailes)	<p>Scope and Content of the Rural Development Supplementary Planning Document (SPD)</p> <p>There is currently limited reference to biodiversity with the proposed Scope and Content of the SPD and we wish to highlight the need for this SPD to consider impacts to biodiversity. We welcome the reference to ‘opportunities to increase biodiversity or to undertake ‘re-wilding’ project’ in the section on Farm Diversification and we recommend that biodiversity should also be referenced within the other sections of the SPD, with relevant examples of potential impacts to biodiversity as well as potential enhancements within rural developments. The Council has a statutory duty under Section 40 of the Natural Environment and Rural Communities Act 2006 (NERC Act) to have regard to the purposes of conserving biodiversity in a manner that is consistent with the exercise of its normal functions such as policy and decision-making. The Council has a number of policies in the Waveney and Suffolk Coastal Local Plans which are relevant to this duty, including Policy</p>	<p>The Rural Development SPD aims to address a range of issues arising from built developments that are commonly found in planning applications submitted to East Suffolk Council. Additional information and guidance where related to rural forms of built development could be included.</p> <p>It is agreed that the SPD should highlight that Rural buildings and barns often support protected species such as bats.</p> <p>It is agreed that the SPD should provide guidance on external lighting and the impact on wildlife, particularly in relation to equestrian developments.</p> <p>It is agreed that the SPD should provide guidance on the role that rural gardens can have in providing habitats for a variety of wildlife.</p> <p>It is agreed that the SPD should reference the impacts of development and farm diversification on protected sites, priority</p>	<p>Include guidance and reference to:</p> <ul style="list-style-type: none"> • Highlight that protected species such as bats live in rural buildings and barns, • Impact of external light on wildlife particularly in relation to equestrian developments, • The role rural garden have in providing habitats, and • Impact of development and farm diversification on protected sites, priority habitats, and County Wildlife Sites due to lighting, noise and recreational disturbance.

	<p>WLP8.34 and Policy SCLP10.1, which could be referred to in this SPD.</p> <p>Rural development can have a significant impact on protected and Priority species. Rural buildings and barns in particular often provide important habitats for protected and Priority species such as bird and bat species. There are specific impacts for each different type of rural development which should be highlighted within the SPD, such as those highlighted in the section on equestrian development in relation to external floodlights and potential wildlife impacts. Lighting of equestrian developments in the countryside can cause particular harm to roosting, commuting and foraging bats. Hedgehogs can also be impacted by rural development, as they often rely on small areas of habitat within rural gardens and farmland for hibernation, which could be impacted by some of the rural development highlighted within this SPD. The whole local population of hedgehogs can be wiped out by developments affecting small pockets of habitat which are suitable for hibernation. Rural gardens can be important habitats for a variety of other wildlife including invertebrates, birds, bats, mammals, reptiles, plants and fungi which are now largely absent from surrounding intensively farmed arable land.</p> <p>We would also welcome reference within the SPD to impacts on protected sites and Priority</p>	<p>habitats, and County Wildlife Sites due to lighting, noise and recreational disturbance.</p>	
--	---	---	--

	<p>habitats, with specific reference to County Wildlife Sites (CWSs). In particular, economic development and farm diversification in the countryside has the potential to impact Priority habitats and CWSs. County Wildlife Sites are designated for their regional value for wildlife and form an important part of the nature recovery network providing crucial steppingstones between nationally important wildlife sites. There is significant potential for CWSs to be impacted by rural development, and it is important that the mitigation hierarchy is followed and impacts are avoided in the early stage of development design. Indirect impacts of rural development on biodiversity should also be highlighted within this SPD, including lighting, noise and recreational disturbance.</p> <p>Farm diversification for example through the provision of camping, glamping or caravan sites can cause increased recreational disturbance to protected sites and Priority habitats. In some quiet, rural locations only a small increase in visitors to a site can damage wildlife interest. These potential impacts should be highlighted in the SPD with reference to sensitive habitats such as estuaries where increased recreational disturbance from rural development may have significant impact and therefore may not be appropriate.</p>		
Tuddenham St Martin Parish	The response from Tuddenham St Martin Parish Council to this initial consultation document is that it is important that weight is	All Planning Applications must be assessed against national, local and neighbourhood planning policies. All	Consult Town and Parish Council on the draft SPD.

<p>Council (Parish Clerk)</p>	<p>given to Parish Council comments as not all small villages are the same and any development should also take into account the size, character and location of the small village.</p>	<p>material objections are given weight when determining a planning application.</p> <p>We will consult Town and Parish Councils on the next stage of the development of this SPD which is the consultation on the draft SPD due to take place Autumn 2023. We will take into consideration all comments received.</p>	
-------------------------------	---	--	--

Appendix 3: Initial Consultation Bodies

The following organisations and groups were consulted during the preparation of the Supplementary Planning Document:

- Elected members
- Developers / landowners / agents / Architects
- Parish / Town Councils
- Suffolk County Council
- Broads Authority
- Great Yarmouth Borough Council
- South Norfolk Place Shaping Team
- South Norfolk District Council
- Babergh and Mid Suffolk District Council
- Ipswich Borough Council
- Natural England
- Environment Agency
- Suffolk Wildlife Trust
- River Waveney Trust
- Suffolk Coast and Heaths AONB
- National Trust
- Countryside Alliance Foundation
- Housing Associations / Groups
- Acorus Rural Property Services
- Home Builders Federations
- DEFRA
- NFU – East Anglia Region
- Tenant Farmers Associations
- Campaign for the Protection of Rural England
- Suffolk Farming & Wildlife Advisory Group
- CEFAS
- Anglian Water Services Ltd
- Norfolk Geodiversity Partnership
- Halesworth Tourism Group

Appendix 4: Draft Consultation Bodies

The following organisations and groups were consulted during the consultation on the Draft Supplementary Planning Document:

- Elected members
- Developers / Agents / Architects
- Town and Parish Councils
- Suffolk County Council
- Broads Authority
- Historic England
- Natural England
- Environment Agency
- Suffolk and North East Essex Integrated Care Board
- Disability Forums
- Sustrans
- Sport England
- Fields in Trust
- Housing associations
- Other national, regional and local organisations and groups related to health, wellbeing, communities and natural environment.

Specific consultation bodies

- Town and Parish Councils adjoining the East Suffolk area
- Local planning authorities adjoining the East Suffolk area – The Broads Authority, Mid Suffolk District Council, Babergh District Council, South Norfolk District Council, Great Yarmouth Borough Council, Ipswich Borough Council
- Canal and River Trust
- Forestry Commission
- Homes England
- Network Rail
- Norfolk County Council
- Suffolk Constabulary
- Theatres Trust
- NHS Suffolk and North East Essex Integrated Care Board
- Norfolk & Waveney Integrated Care Board

General consultation bodies

- British Horse Society
- Royal Town Planning Institute (RTPI)
- Town and Country Planning Association
- West Suffolk Council

Other individuals and organisations

Includes local businesses, individuals, local organisations and groups, planning agents, developers, landowners, residents and others on the Local Plan mailing list.

Appendix 5: Draft Consultation Promotion Material

Social media platform	Date	Image
Twitter	15 th November 2023	 <p>East Suffolk Council @EastSuffolk</p> <p>Have your say on two new Supplementary Planning Documents (SPDs):</p> <ul style="list-style-type: none"> - a Healthy Environments SPD to provide guidance on how new development can better support health and wellbeing - and a Rural Development SPD to guide development in rural areas. <p>bit.ly/46beOkI</p> <p>ALT</p> <p>East Suffolk Council Planning</p> <p>3:45 PM · Nov 15, 2023 · 660 Views</p>
	30 th November 2023	 <p>East Suffolk Council @EastSuffolk · Nov 30</p> <p>Have your say on 2 new Supplementary Planning Documents (SPDs):</p> <ul style="list-style-type: none"> - a Healthy Environments SPD to provide guidance on how new development can better support health and wellbeing - and a Rural Development SPD to guide development in rural areas: <p>bit.ly/48beOkI</p> <p>ALT</p> <p>East Suffolk Council Planning</p> <p>249</p>

<p>Facebook</p>	<p>15th November 2023</p>		
	<p>30th November 2023</p>		
<p>LinkedIn</p>	<p>15th November 2023</p>		

Press Release – 15th November 2023

Have your say on two planning documents

Posted by on 15 November 2023 | Comments

East Suffolk residents are invited to have their say on two new planning documents that provide guidance on rural developments and environments that promote health and well-being.

East Suffolk Council is seeking views through a public consultation on two supplementary planning documents - the draft Rural Development Supplementary Planning Document (SPD) and the draft Healthy Environments Supplementary Planning Document (SPD). The consultation will run for 8 weeks from Wednesday 15 November to Wednesday 10 January 2024, closing at 5pm.

The draft [Rural Development SPD provides guidance on matters related to development in rural areas](#), including rural worker dwellings, annexes, residential curtilage expansion, building and barn conversions, economic development, equestrian development, tourism accommodation, small scale renewable energy generation and wastewater management.

The [draft Healthy Environments SPD](#) provides guidance on matters related to the planning and design of active travel infrastructure (cycling and walking routes and cycle parking), green infrastructure (green open spaces, play provision, biodiversity, trees and landscaping), homes, schools, workplaces, community facilities and retail centres. The aim of the guidance is to support healthier, active lifestyles and improve the quality of environments for health and wellbeing and greater inclusivity.

Cllr Stephen Molyneux, East Suffolk's deputy cabinet member for Planning and Coastal Management said: "These Supplementary Planning Documents provide key guidance for developments in rural areas and outline how we can support health and wellbeing by promoting active lifestyles within rich green spaces. We welcome all feedback and comments received will be carefully considered when finalising the document."

Poster



Consultation period
15th November 2023 – 10th January 2024

Public Consultation on two Supplementary Planning Documents

Rural Development and Healthy Environments

What are we doing?

East Suffolk Council is preparing two documents to support planning policy - one which will provide guidance on the types of development found in rural areas and provide additional detail on a broad range of rural issues, and another to provide guidance related to the design of built environments that support the health and wellbeing of the district's communities.

How can you get involved?

HIGHLIGHT ISSUES
Matters to highlight could include rural employment, tourism and rural character, residential amenity, accessibility, inclusivity, access to open space and active travel infrastructure.

SUGGEST SOLUTIONS
Are there ways the Council could support rural development and the creation of healthier environments?

Find out more and give your views:
[www.eastsuffolk.gov.uk/
planningpolicy](http://www.eastsuffolk.gov.uk/planningpolicy)

Alternatively, please send ideas to:
East Suffolk Council, Planning Policy & Delivery Team, Riverside, 4 Canning Road, Lowestoft, Suffolk NR33 0EQ

✉ planningpolicy@eastsuffolk.gov.uk
☎ 01394 444557 / 01502 523029

Appendix 6: Draft Consultation Responses

Please note that in the Comment Summary column any page and paragraph numbers relate to the Draft Rural Development Supplementary Planning Document (November 2023).

Chapter 1 Introduction - Context

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
National Highways (Sir/Madam)	1	National Highways does not predict that the contents and items covered within the SPD will have any adverse impact on the Strategic Road Network (SRN). National Highways do not have any specific comments on the SPD. Standing advice was provided regarding climate change, the UK's aim to achieve net zero carbon status by 2050, and that action is needed to support a modal shift away from car travel	Comments noted.	No changes have been made to the SPD because of these comments.
Aldeburgh Town Council (Town Clerk)	10	Aldeburgh Town Council is pleased with the protection afforded by the National Landscape (formerly AONB) and seeks protection of the "curtilage" around the National Landscape, setting of the town and its countryside.	This Supplementary Planning Document (SPD) aims to provide advice and guidance to support planning policies in the Suffolk Coastal Local Plan and Waveney Local Plans. The SPD cannot set new planning policies, specific requirements or targets. The SPD cannot provide new planning policy protection for the "curtilage" of National Landscapes (formerly Areas of Outstanding Natural Beauty), the setting of Aldeburgh town or its surrounding countryside.	No changes have been made to the SPD because of these comments.

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
Broads Authority (Natalie Beal)	16	Request to mention the Broads in paragraph 1.2, particularly the impact of development on the setting of the Broads.	It is agreed that reference should be made to the Broads Authority area and the impact that development could have on the setting of the Broads.	Reference to the Broads has been made in paragraph 1.2.
Martlesham Parish Council (Diane Linsley)	19	Martlesham Parish Council notes the consultation documents should be circulated as widely as possible and each section should include a summary. The Parish Council supports the ideas in the document.	<p>The consultation was circulated widely with emails and letters sent to everyone on the with full details provided in the Consultation Statement.</p> <p>Each chapter has an introduction, a section briefly outlining the key planning policies addressed in the chapter, and policy guidance section that lists the topics covered in the chapter. We trust this provides a sufficient summary/ overview of the chapters contents for the reader.</p> <p>Support for the SPD is appreciated.</p>	No changes have been made to the SPD because of these comments.
Historic England (Debbie Mack)	26	Historic England welcomes references to heritage and the historic environment, and consider the SPD through and consistent with Historic England's advice.	Support for the SPD is appreciated.	No changes have been made to the SPD because of these comments.
Historic England (Debbie Mack)	28	Historic England encourages drawing on the knowledge of local conservation officers, the county archaeologist and local heritage groups.	During the drafting the SPD planning officers met regularly with a Steering Group that included Design and Conservation Officers. The SPD has been widely consulted on with comments received from the Suffolk County Council Archaeological Service.	No changes have been made to the SPD because of these comments.

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
Benacre Company (Lucinda Hutson)	34	The Benacre Company in their conclusion have noted they want some changes to the SPD.	The comments provided by Benacre Company have been appreciated and responses to these detailed comments have been made in the relevant sections of the SPD.	Changes made in the relevant sections of the SPD.
Aldeburgh Town Council (Town Clerk)	36	Aldeburgh Town Council wishes to see permitted planning applications and their conditions fully implemented, particularly in regarding to landscaping. The Town Council suggests that the SPD reminds developers not to allow landscaping and other areas without which planning would be refused to remain incomplete. Aldeburgh Town Council congratulates East Suffolk Council for producing these policy documents. The Town Council notes that it is not represented on East Suffolk Council's Planning Committee and would welcome more direct contact with the Planning Department, such as short reports, briefings / precis is available and appropriate to alter it to any significant alterations and changes to the rules and regulation affecting the area.	Compliance and enforcement are important planning matters, but they are not matters for this SPD which seeks to provide detailed guidance to support planning policies in the Local Plans. East Suffolk Council recommends Aldeburgh Town Council report any and all compliance and implementation issues to East Suffolk Enforcement Officers in the Planning Department so they can be investigated and potentially action taken were necessary. Support for this SPD is appreciated. Where appropriate the SPD will amended in response to consultation comments received. East Suffolk Council will continue to consult Town and Parish Councils on the development of relevant planning documents and hold regular Town and Parish Forums.	No changes have been made to the SPD because of these comments.
Suffolk County Council (Georgia Teague)	40	References to the NPPF need updating following the publication of latest version in December 2023. References	It is agreed that references to the NPPF and National Landscapes all need updating.	All references to the NPPF and National Landscapes have been updated.

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
		to the AONB need changing to the new name, National Landscapes.		

Chapter 2 Rural Worker Dwellings

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
Kettleburgh Parish Council (Sonia Frost)	8	Concern that temporary accommodation, such as caravans or portacabins, could be converted to a permanent dwelling. A temporary dwelling should not become a precursor to a permanent permission being granted.	If the council deems it necessary to impose a temporary condition then it is a matter of monitoring and enforcement to ensure that a permanent form of accommodation is not created as opposed to a matter to be addressed within the SPD.	No changes have been made to the SPD because of these comments.

Chapter 3 Rural Annexes

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
Hollesley Parish Council (Judi Hallett)	4	Hollesley Parish Council totally disagree that an annex must share services.	Shared services including mains utility connections with the main dwelling are considered a characteristics of an annexe. Where an annexe does not meet the characteristics listed in paragraph 3.10, there is a risk that it will form an independent, new dwelling.	No changes have been made to the SPD because of these comments.
Liberal Democrats (Jules Ewart)	11	The respondent does not consider distance to alienate an annexe from a main dwellings and that greater flexibility should be given to	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	No changes have been made to the SPD because of these comments.

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
		properties near the village envelope.	the proposed development is ancillary and well related as an annexe and does not result in the creation of new dwelling that is contrary to planning policy.	
Liberal Democrats (Jules Ewart)	12	The length of caravan stated in paragraph 3.28 is short and needs reviewing.	The length of caravan stated in paragraph 3.32 is taken from the Caravan Sites Act 1968. The SPD cannot set new planning policies or review national legislation.	No changes have been made to the SPD because of these comments.
Liberal Democrats (Jules Ewart)	13	States that the current document is not visionary enough and they would encourage greater independence from the main dwelling.	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 does not result in the creation of new, independent dwelling that is contrary to national and local plan policy. The government, through the NPPF, does not support the creation of isolated dwellings in the countryside.	No changes have been made to the SPD because of these comments.
Liberal Democrats (Jules Ewart)	14	Paragraph 3.10 has an urban gauge and should have rural version.	Paragraph 3.10 lists the characteristics of an annexe. These characteristics are relevant to rural locations but may also apply to urban locations.	No changes have been made to the SPD because of these comments.

Chapter 4 Rural Residential Curtilage Expansion

No comments received.

Chapter 5 Rural Buildings and Barn Conversions

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
Hollesley Parish Council (Judi Hallett)	5	Much of Chapter 5, Rural buildings and barn conversions, imposes endless rules about why conversions should not be contemplated.	Guidance is provided to assist in the implementation of planning policy and 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.	No changes have been made to the SPD because of these comments.
Suffolk County Council Archaeological Service (Sir/Madam)	2	<p>Overall Historic England is very pleased with the guidance referring to conversions of rural buildings and barns.</p> <p>In section 5.38 add that a Heritage Statement should accompany any planning application for the conversion of historic agricultural buildings.</p> <p>In section 6.106 add reference to Suffolk HER and that a Heritage Statement should accompany any planning application for airfields with historically important buildings.</p>	It is agreed that paragraphs 5.38 and 6.108 should include reference to a Heritage Statement and that paragraph 6.108 should also include reference to a Suffolk Historic Environment Record (HER).	Paragraphs 5.38 and 6.108 updated to include references to Heritage Statements and Suffolk HER respectively.
Suffolk County Council (Georgia Teague)	20	Paragraph 5.12, 5.16, 5.14, 5.118, 5.135, 5.137, 5.141, and 5.143 should read “Flood Risk Assessment for any site at risk of flooding from any source.”	The relevant paragraphs quote from the General Permitted Development Order which cannot be changed. However, it is agreed that the SPD references to flood risk should be updated and links to the LLFA added.	A footnote has been added to the relevant text that states “The December 2023 NPPF requires a Flood Risk

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
		<p>Paragraph 5.123 should include a link to the LLFA.</p>		<p>Assessment for any site at risk of flooding from any source.” A reference to Suffolk County Council as the Lead Local Flood Authority has been added to paragraph 5.126 together with a website link.</p>
<p>Historic England (Debbie Mack)</p>	<p>27</p>	<p>Para 5.4 The first sentence should also refer to the historic environment.</p> <p>Para 5.6 After the first sentence an additional sentence should be inserted to read: Opportunities should be sought to enhance the setting of listed buildings by the use of traditional design and techniques and appropriate external treatment.</p> <p>Para 5.8 We suggest that the text should make clear that Listed Building Consent will be needed for listed buildings for greater clarity.</p> <p>New para between 5.19 and 5.20, to explore the importance of</p>	<p>It is agreed that the SPD should be updated as suggested.</p>	<p>Paragraph 5.5 (formerly 5.4), 5.7 (formerly 5.6), and 5.9 (formerly 5.8) updated and new paragraphs 5.4 and 5.21 added.</p>

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
		<p>considering the most appropriate use of a barn.</p> <p>Para 5.20 We very much welcome this detailed section.</p>		
Benacre Company (Lucinda Hutson)	31	<p>The principle of utilise existing outbuildings or additional ranges for accommodation and storage rather than proposing any new extensions is supported, but it is likely to make a large number of traditional and smaller buildings totally unviable for conversion. These buildings are likely to be underutilised and fall into disrepair. Where there is an obligation to repair it can be a financial burden on the owner.</p> <p>The document should promote utilisation of these buildings in a sustainable manner to maintain them as part of the local heritage. It would be beneficial to comment on how applications will be viewed where buildings cannot be viably converted or utilised without additions or extensions.</p> <p>Rural buildings are often isolated and will almost always be required</p>	<p>The SPD aims to support the conversion of barns in a sustainable manner. Extensions should not be necessary but paragraph 5.58 notes that “limited extensions to the original building may be appropriate in exceptional circumstances if it enables the character of important internal spaces to be retained.” It is agreed that additional guidance regarding extensions should be provided.</p> <p>It is agreed that barn conversions are typically dependant on the private car.</p>	<p>New paragraph 5.4 has been added to clarify that barn conversion are typically dependant on the private car. Paragraph 5.59 has been added stating that justification for extensions should be provided in the Design and Access Statement or Heritage Statement.</p>

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
		via car. This should not preclude their conversion to the most suitable and economic use.		
Suffolk County Council (Georgia Teague)	38	It is recommended that chapter 5 is expanded to encourage suitable travel/ accessibility for all.	Barns are often permitted despite limited or no access to suitable public transport to enable the re-use and retention of the redundant buildings.	In chapter 5 a new paragraph 5.4 has been added to explain why the conversion of barns is permitted in rural and remote locations where the user may be dependant on the private car for transport.

Chapter 6 Economic Development

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
Suffolk County Council Archaeological Service (Sir/Madam)	3	Suffolk County Council Archaeology supports the guidance about the conversion of rural buildings and barns. It makes the importance of these buildings clear and it is good to see reference to the Suffolk Historic Environment Record and the Historic Farmsteads project. SCC also supports statement that historic airfields contain historic	Agreed. Paragraph in chapter 5 to be amended to refer to Heritage Statement. Paragraph in chapter 6 to be amended to refer to heritage assessment and Suffolk Historic Environment Record.	Add sentence to end of paragraph 5.38 to read: 'Any planning application for the conversion of an historic agricultural building should be accompanied by a Heritage Statement.' Add sentence to the end of paragraph

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
		<p>buildings.</p> <p>Add text to paragraph 5.36 to state that a Heritage Statement should accompany applications for conversion of historic agricultural buildings. This, together with reference to the Suffolk Historic Environment Record, could also be added to paragraph 6.106.</p>		<p>6.108 to read: '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.'</p>
<p>Broads Authority (Natalie Beal)</p>	<p>17</p>	<p>Paragraphs 6.23-6.25 - Need to provide guidance about biodiversity enhancements, particularly for development not subject to biodiversity net gain.</p> <p>Paragraphs 6.16, 6.29, 6.30 and 6.31 - Need to prove that lighting is justified.</p> <p>Paragraph 6.32 - Amend text to make reference to The Broads.</p> <p>Paragraph 6.35 - Amend text to make reference to The Broads.</p> <p>Paragraph 6.40 - Ament text to state that junction design should</p>	<p>Paragraphs 6.23-6.25 - Agreed.</p> <p>Paragraphs 6.16, 6.29, 6.30 and 6.31 - Agreed.</p> <p>Paragraph 6.32 - Agreed.</p> <p>Paragraph 6.35 - It is agreed that a reference to the Broads should be added. However the impact on the Broads should be minimised rather than eliminated as this is a more realistic and practical approach.</p> <p>Paragraph 6.40 - Agreed.</p> <p>Paragraph 6.69 (title) - Agreed.</p> <p>Paragraph 6.69 (text) - Agreed.</p>	<p>Previous paragraphs 6.24 and 6.25 replaced by new paragraph 6.25 that addresses biodiversity comments. Extra sentence added to end of paragraph 6.16 regarding security lighting. Extra sentence added to end of paragraph 6.30 regarding external lighting. Paragraph 6.32 and 6.35 updated with</p>

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
		<p>avoid removal of hedgerows.</p> <p>Paragraph 6.69 - Add reference to The Broads to the title.</p> <p>Paragraph 6.69 - Add reference to the setting of The Broads to the text.</p> <p>Paragraph 6.70 - Delete text at end of paragraph 6.69 and insert new title to refer to the Setting of Heritage Assets.</p> <p>Paragraph 6.79 - Amend text to make reference to the setting of The Broads.</p> <p>Paragraph 6.82 - Amend text to make reference to the setting of The Broads.</p> <p>Paragraph 6.124 - Amend text to make reference to the setting of The Broads.</p>	<p>Paragraph 6.70 - Agreed.</p> <p>Paragraph 6.79 - Agreed.</p> <p>Paragraph 6.82 - Agreed.</p> <p>Paragraph 6.124 - Agreed.</p>	<p>references to the Broads. - Paragraph 6.40 updated to include reference to the design of junctions and hedgerows. Paragraph 6.71 - Add '...and The Broads' to the end of the title and update references to the Broads in the text. New title added above paragraph 6.72. References to the Broads added to paragraph 6.80, 6.83, and 6.126.</p>
Suffolk County Council (Georgia Teague)	21	<p>Paragraph 6.18 - Add link to Local Flood Authority website.</p> <p>Paragraph 6.104 - Amend sentence 4 to state that a Floor Risk Assessment for sites that are</p>	<p>Paragraph 6.18 (now 6.19) - Agreed. Text amended.</p> <p>Paragraph 6.104 -It is agreed that text should be amended.</p>	<p>Paragraph 6.19 - Additional sentence added: 'Suffolk County Council is the Lead Local Flood Authority for Suffolk.</p>

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
		at risk of flooding from any source.		It is responsible for planning and coordinating the County's response to flooding.' Website address added as a footnote. Paragraph 6.104 - Sentence 4 amended to read as follows: 'A Flood Risk Assessment is required for all development sites that are at risk of flooding from any source.'
Suffolk County Council (Georgia Teague)	22	Reference in paragraphs 6.54 and 8.39 to the Suffolk Guidance for Parking needs updating to refer to 2023 version.	It is agreed that references to the Suffolk Guidance for Parking, NPPF and National Landscapes all need updating.	References to the Suffolk Guidance for Parking, NPPF and National Landscapes have all been updated.
Environmental Protection, East Suffolk Council (Environmental Protection)	24	The text fails to mention wider air quality issues. Reference is made to air quality standards PM2.5 and PM10.	Reference to PM2.5 and PM10 is too detailed for this SPD. General text about minimising dust and air quality will be added instead.	Additional text added to the end of paragraph 6.33: 'New proposals should also be designed so as to minimise dust and maintain air quality.'

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
Bentwaters Park Ltd (Sir/Madam)	29	<p>Evolution Town Planning is acting on behalf of the owners of Bentwaters Airfield and Debach Airfield. It objects to paragraphs 6.101, 6.103, 6.104, 6.105 and 6.106. This is because Bentwaters Parks and Debach Airfield were both converted from airfield to employment uses many years ago. As such, issues such as drainage and sewerage, flood risk, landscape impact and contamination have been resolved. Therefore these paragraphs should not apply to well established employment sites, unlike newly converted airfields.</p>	<p>Agreed. The text will be amended to make clear that it only applies to airfields recently converted to employment uses.</p>	<p>Paragraph 6.103 - Add sentence at end to read: 'Some former airfields have longstanding commercial uses and so these issues will already have been resolved.' Paragraph 6.105 - Amend sentence 1 to read: 'Some sites that are only just being converted to employment may be contaminated from previous uses.' Paragraph 6.106 - Add sentence at end to read: 'Many of these issues will already have been resolved where there are longstanding and well-established employment uses.' Paragraph 6.107 - Amend sentence 1 to read 'The impact of proposals for new</p>

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
				conversions to employment use...'
Bentwaters Park Ltd (Sir/Madam)	30	<p>Objection received to paragraph 6.103 in the section on the Development of Former Airfields in chapter 6. The respondent wants the SPD to distinguish between developing and undeveloped former airfields. The respondent also wants flexibility when preparing planning applications for development on airfields that have well established industrial/ employment areas, particular at Debach and Bentwaters.</p>	<p>Planning applications for airfield developments should address land contamination, sewerage facilities, flood risk and drainage issues.</p> <p>Planning Policy SCLP12.35: Former airfield Debach requires investigation of contamination, adequate sewerage facilities, a Flood Risk Assessment, and a drainage strategy.</p> <p>Planning Policy SCLP12.40: Bentwaters Park states "the Council will permit new employment uses where they will not breach site, environmental and highway constraints identified and conditioned in the planning permission C/10/3239 approved 11/12/2015. Outside of those limits new employment uses will be permitted where they are supported by robust evidence which confirms that their individual and cumulative impacts are acceptable. In both circumstances, proposals should conform to local and national planning policy, particularly with regard to the environmental designations on and in close proximity to the site."</p> <p>Advice and guidance in the SPD is considered appropriate to support the implementation of the local plan policies.</p>	<p>Paragraph 6.105 has been updated to specify that requirement are subject to existing planning policy requirements.</p>

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
Benacre Company (Lucinda Hutson)	32	<p>Further clarity is needed about how diversity guidance applies to estates, where farming is one of several activities.</p> <p>Guidance needs to support a wide range of farm diversification uses. It is necessary that diversification schemes meet local demand.</p>	<p>It is agreed that further text is needed about how guidance applies to the management of large estates.</p> <p>The text also need to acknowledge the wide range of diversification schemes that exist. However, it will be added that each proposal for a diversification scheme will be decided on its merits.</p>	<p>The following text has been added to the end of paragraph 6.122 - '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 following text has been added to the end of paragraph 6.123 - 'There are many types of diversification. The Council will consider proposals for different types of diversification schemes on their</p>

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
				merits. Some of the most common types of diversification are considered later in this chapter'

Chapter 7 Equestrian Development

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
Hollesley Parish Council (Judi Hallett)	6	It appears that it is the presumption that equestrian development will be damaging, and your job is to stop it. We disagree with this presumption.	It is the intention that guidance assists in the implementation of planning policy and ensures that equestrian development positively impacts the character of the rural landscape and natural environment. It is not the presumption that all equestrian development is damaging, however where potential issues arise, mitigation measures need to be implemented to reduce negative impacts.	No changes required.
Suffolk County Council (Georgia Teague)	39	Support given for paragraphs 7.29 and 8.41.	Support appreciated.	No changes have been made to the SPD because of these comments.

Chapter 8 Tourism Accommodation

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
Liberal Democrats (Jules Ewart)	15	Suggests that the holiday condition requirement is rewritten to be temporary in accordance with its business need.	The SPD can provide guidance on its existing policies, but cannot rewrite the existing holiday condition requirements. Whilst the exact wording of the holiday condition can be guided by the SPD (an example condition is included), it must retain the key requirements of the policy. These are: permit holiday use only, restricted to a continuous period of 56 days by one person or persons within one calendar year, plus require a	No changes have been made to the SPD because of these comments.

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
			register of all lettings, to be made available at all times.	
Environmental Protection, East Suffolk Council (Environmental Protection)	23	Asked whether the document covers the different patterns of behaviour exhibited by residents of tourist accommodation compared to occupants of a residential property.	It is recognised that there may be different patterns of behaviour between normal residential properties and tourist accommodation with the potential for more disruption, accordingly a paragraph has been added to the next to reflect this.	A new paragraph 8.48 has been added.
Benacre Company (Lucinda Hutson)	33	<p>Wished to understand how the desire for year round tourism and holiday condition restrictions can be balanced.</p> <p>Also wished to have text that supports where existing parking and transport issues can be addressed by an application.</p>	<p>The desire for greater levels of year-round tourism has been put forward in the two local plans and the Tourism Strategy that helped inform them. The policies do not provide a preference to permanent or temporary structures, but there are additional criteria placed upon applications for permanent tourism accommodation. This is because permanent accommodation can come under pressure to be occupied for full time residential use. The policy allows for a diversity of accommodation types subject to a criteria will ensuring inappropriate residential development is not an outcome.</p> <p>Developments within East Suffolk would be expected to meet other policy such as WLP8.29, WLP8.21, SCLP7.1, SCLP7.2 and SCLP11.1 which outline parking requirements as well as the need to meet parking standards provided by Suffolk County Council. These policies are universal and do not specifically relate to topics in the Rural Development SPD.</p>	No changes have been made to the SPD because of these comments.

Chapter 9 Small Scale Renewable Energy Generation

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
Broads Authority (Natalie Beal)	18	Add information on the Broads and refer to the Landscape Character Assessment.	It is agreed that additional reference to the Broads and the Landscape Character Assessment should be added.	New paragraph 9.42 added which includes reference to wind turbines, the Broads and the Broads Landscape Character Assessment.
Environmental Protection, East Suffolk Council (Environmental Protection)	25	Additional information required for sections on biomass boilers, wind turbines and anaerobic digestion plants, including the need for air quality assessments and consideration of noise impacts.	It is agreed that additional information should be included.	New paragraph 9.34 added regarding the impact of biomass boilers on air quality and the need for an air quality impact assessment. New sentence added to end of paragraph 9.38 regarding noise impact of wind turbines. New sentence added to beginning of paragraph 9.49 regarding air quality assessments for anaerobic digestions plants.

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
Aldeburgh Town Council (Town Clerk)	35	Aldeburgh Town Council requests stronger guidance on air source heat pumps including signposting to other sources of information. The Town Council requests guidance on air source heat pumps' suitability, noise insulation, running costs, and need for secondary means of heating.	It is agreed the document could provide more information regarding heat pumps.	New paragraph 9.42 added which includes reference to wind turbines, the Broads and the Broads Landscape Character Assessment.
Environmental Protection, East Suffolk Council (Environmental Protection)	37	Heat pumps have the potential to generate noise, and this should be considered during the design.	It is agreed that heat pumps can generate noise, and this should be noted in the SPD.	New paragraph 9.28 added regarding heat pump noise.

Chapter 10 Wastewater Management in Rural Areas

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
Hollesley Parish Council (Judi Hallett)	7	The document makes it clear that not only new property, but existing property with private sewerage systems, must comply with the current regulations for new property regarding this.	Comment noted.	No changes have been made to the SPD because of these comments.
Anglian Water Services Ltd (Tessa Saunders)	9	Anglian Water welcomes reference to their role as the statutory sewerage undertaker for East Suffolk. The PR24 Business Plan 2025-2030 sets out Anglian Water plans for the	Comments noted.	No changes have been made to the SPD because of these comments.

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
		future. The comments set out the three conditions that must be met for Anglian Water to provide a public sewer.		

Write to us



East Suffolk Council
Planning Policy and
Delivery Team
Riverside, 4 Canning
Road, Lowestoft,
NR33 0EQ

Call us



Planning Policy and Delivery Team (Local Plans)

01394 444557

Email us



Planning Policy and Delivery Team (Local Plans)

planningpolicy@eastsoffolk.gov.uk

This document is available in alternative formats and in different languages on request. If you need support or assistance to help you read and/or

understand this document, please contact the Council using one of the methods above.

www.eastsuffolk.gov.uk/Planning

Equality Impact Assessment Screening Opinion

Rural Development Supplementary
Planning Document

November 2023



Introduction

1. It is the Council's duty under the Equality Act 2010 to undertake an Equality Impact Analysis at the time of formulating a decision, drafting a report, designing or amending a policy. This will ensure that the Council is considering and taking positive action where possible to promote access to services for all their communities, including their wider communities. The Equality Impact Assessment Screening Assessment will assess whether there is any impact upon any of the groups with protected characteristics under the Equalities Act, which are listed in the table below. If an adverse impact upon any of these groups is identified then a full Equalities Impact Assessment will be required.
2. The Rural Development Supplementary Planning Document provides comprehensive guidance about development in rural areas. It seeks to address planning issues that are often encountered by property owners, business owners, agents, developers and members of the public. The SPD is divided into a number of chapters, which are summarised below.

Introduction

3. This chapter provides a brief description of East Suffolk and emphasises the qualities of its rural environment and landscapes. It sets out objectives of the SPD and states that it does not seek to replicate local plan policies. It also provides the policy context for the SPD and includes an overview of relevant national and local policies.

Rural Worker Dwellings

4. This chapter provides an explanation of rural workers dwellings and explains when they are necessary. Key local plan policies are Suffolk Coastal Local Plan policy SCLP5.6 (Rural Workers Dwellings) and Waveney Local Plan policy WLP8.8 (Rural Workers Dwellings in the Countryside). Existing dwellings should always be used where possible to house rural workers. The applicant needs to demonstrate that the worker needs to live on site, is employed full time and works for a well-established business. To qualify as rural workers dwellings is necessary for them to live on site permanently year-round. This chapter also sets out design considerations and the need for an occupancy condition as part of any planning permission. The final part of the chapter sets out how occupancy conditions can be changed.

Rural Annexes

5. This chapter explains that Rural Annexes are required in certain circumstances. It sets out the policy background, stating that key Local Plan policies are Suffolk Coastal Local Plan policy SCLP5.13 (Residential Annexes) and Waveney Local Plan policy WLP8.8 (Residential

Annexes in the Countryside). This chapter provides information about the key characteristics of an annex, together with an explanation about how to design an annex. It also provides guidance about designing extensions to existing buildings to create an annex, conversions to existing buildings to create an annex, and how new buildings can form annexes.

Rural Residential Curtilage Expansion

6. Residential curtilage is land immediately surrounding a dwelling house. This chapter helps property owners to understand which uses count as residential and when planning permission is required for a change of use of land. It explains how permitted development orders affect residential curtilage expansion. This chapter explains the impact of residential curtilage expansion on settlement boundaries, boundaries and hedgerows, as well as landscape and biodiversity. The last part of the chapter sets out information about permitted development rights and planning conditions.

Rural Buildings and Barn Conversions

7. This chapter explains what rural building and barn conversions are and sets out the policy background. Key local Plan policies about residential conversions are Suffolk Coastal Local Plan policy SCLP5.5 (Conversions of Buildings in the Countryside) and Waveney Local Plan policy WLP8.11 (Conversion of Rural Buildings to Residential Use). Key policies about employment use are Suffolk Coastal Local Plan SCLP4.6 (Conversion and Replacement of Rural Buildings for Employment Use) and Waveney Local Plan policy WLP8.14 (Conversion and Replacement of Rural Buildings for Employment Use). This chapter sets out the key principles for converting an agricultural building to a dwelling. Key issues include whether an agricultural building can be converted to residential use and whether it is structurally sound. There is guidance about alterations to historic buildings and modern agricultural buildings. The chapter provides general guidance about converting agricultural buildings. Finally, the chapter provides guidance about class Q prior approval developments.

Economic Development

8. This chapter sets out the key national and local policies concerning economic development in the countryside. It then provides guidance about common types of economic development in the countryside. Topics covered include factories and workshops, development of former airfields, farm diversification schemes, dog exercise fields and farm cafes and shops. The chapter also provides general guidance about issues such as road access, parking, design, and landscaping.

Equestrian Development

9. This chapter describes ways in which equestrian development can impact upon the landscape. Crucially, equestrian development is not always covered by agricultural permitted development. This chapter therefore details the types of equestrian development that will require change of use and those which count as permitted development. This chapter also explains how equestrian development can impact upon wildlife and the historic environment and ways in which impact can be mitigated. The last part of the chapter discusses the provision of access for both equestrians and vehicles, as well as environmental protection considerations (such as animal licensing and water supply).

Tourism Accommodation

10. This chapter sets out the policy guidance surrounding tourism accommodation. This includes key considerations such as permanence and attachment to the ground. Other topics include transport to and from the site, mitigating impacts on European protected sites, scale and design, sustainability, impact on areas of outstanding natural beauty, planning conditions on new tourist accommodation developments and permitted development rights.

Small-scale renewable energy regeneration

11. This chapter provides policy guidance about residential energy generation (including historic buildings), roof-mounted photovoltaics, solar power farm equipment, heat pumps, biomass boilers and wind turbines. Within each of these topics is a discussion of permitted development and the section about wind turbines also includes information about landscape impact and biodiversity.

Wastewater management in rural areas

12. This chapter provides guidance about existing septic tanks and treatment plants and new sewerage treatment plants. This includes the design and location of new sewage treatment plants.

Equality Impact Assessment

13. The Equality Act 2010 lists nine protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation. East Suffolk Council has added a tenth characteristic, socio-economic deprivation, in addition to the nine protected characteristics listed in the legislation. This reflects that pockets of deprivation that exist across East Suffolk.

Screening of impact on different groups

	Groups	Likely Impact (positive/negative/no impact)	Reason for your decision
a	Age (Includes safeguarding issues)	Positive impact.	The Rural Development SPD provides guidance about the design and construction of residential annexes. This provides accommodation for those who would like to live independently but still need to live close to their families. It will therefore benefit those of different age groups, particularly the elderly. Consultation documents will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material. The consultation will therefore not discriminate against those from different age groups.
b	Disability	Positive impact.	The Rural Development SPD provides guidance about the design and construction of residential annexes. This provides accommodation for those who would like to live independently but still need to live close to their families. It will therefore benefit those with a disability. Consultation documents will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material.

			The consultation will therefore not discriminate against those with a disability.
C	Gender reassignment	No impact.	The Rural Development SPD provides about development in rural areas. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material. The consultation will therefore not discriminate against those who have undergone gender reassignment.
D	Marriage and Civil Partnership	No impact.	The Rural Development SPD provides about development in rural areas. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material. The consultation will therefore not discriminate against those who are married or in a civil partnership.
E	Pregnancy and maternity	No impact.	The Rural Development SPD provides about development in rural areas. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material.

			The consultation will therefore not discriminate against those who are pregnant or on maternity leave.
F	Race	No impact.	The Rural Development SPD provides about development in rural areas. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material. The consultation will therefore not discriminate against those from different racial backgrounds.
G	Religion or Belief	No impact.	The Rural Development SPD provides about development in rural areas. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material. The consultation will therefore not discriminate against those from any religion or belief.
H	Sex	No impact.	The Rural Development SPD provides about development in rural areas. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material. The consultation will therefore not

			discriminate in terms of sexual identity.
I	Sexual orientation	No impact.	The Rural Development SPD provides about development in rural areas. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material. The consultation will therefore not discriminate in terms of sexual orientation.
J	Socio-economic deprivation	No impact.	The Rural Development SPD provides about development in rural areas. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material. The consultation will therefore not discriminate against those who are experiencing social or economic deprivation.

Consultation and Engagement

14. An initial consultation took place between 1st February 2023 and 16th March 2023. The purpose of this initial consultation was to inform the structure and content of the Rural Development SPD. The consultation took place online and consisted of a questionnaire, which sought the views of those taking part. The following organisations and groups were consulted as part of the initial consultation:

- Specific Consultation Bodies

- Neighbouring Authorities
 - Town and Parish Councils
 - Developers
 - Agents
 - Architects
 - Planning Consultants
 - Housing Associations
 - Rural, farming and business associations Tourism Groups
15. The consultation was also advertised on social media. Town and parish councils, elected members and other organisations were notified directly by email or post. Hard copies were made available by post by contacting the Planning Policy and Delivery Team. In total, 26 individuals and organisations responded to the consultation. Comments received have been taken into account in the preparation of the draft SPD.
16. The document has also been presented to the Local Plan Working Group, which is where elected members provide advice and scrutiny about the preparation of planning documents.
17. There will also be a formal stage of consultation, which is scheduled to run between 15th November 2023 and 10th January 2024. This consultation will last a total of eight weeks. An extra two weeks have been added to the duration of the consultation to take account of the latter part of the consultation overlapping with the Christmas holidays. The purpose of this consultation is to enable respondents to comment on the draft Rural Development SPD. The document will be made available online on the Council's website to enable people to comment. Consultation letters and emails will be sent to consultees on the Council's planning policy mailing list. A press release will be released covering the consultation. The planning policy mailing list includes Town and Parish Councils, Suffolk County Council, East Suffolk Councillors, neighbouring district Councils including the Broads Authority, developers, agents, landowners, business associations, civic societies, infrastructure providers, and members of the public.
18. Copies of consultation documents will be available online, and hard copies made available for inspection in libraries and in the Council's customer service centres.
19. Anyone who is unable to view the consultation documents online, in libraries or in the Customer Service Centres can contact the Planning Policy and Delivery Team, and the publicity material provides contact details and an offer of assistance.

Presentation in Different Languages

20. As part of an eight-week period of formal consultation, the document will be published on the Council's website as well as in libraries and customer service centres, with hard copies available on request for those who cannot access the consultation in the ways listed above. The document may be requested in a different language. When such requests are received the Customer Services Team will be involved with ensuring this request is actioned.

Proposed Changes

21. The Council will analyse responses received during the public consultation and will make any appropriate changes as a result of comments received.

Conclusion

22. This EQIA screening exercise shows that the Rural Development SPD will not negatively impact upon any protected group or those experiencing socio-economic deprivation. Therefore, a full EQIA assessment is not considered necessary.



Strategic Environmental Assessment Screening Opinion

Draft Rural Development Supplementary Planning Document

November 2023

Contents

1. Introduction	1
2. Legislative Background	1
3. Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC	2
4. Assessment	3
5. Conclusion.....	7
Appendix 1: Responses from Statutory Consultees.....	8

1. Introduction

The Rural Development Supplementary Planning Document (SPD) is being produced by East Suffolk Council. The SPD will apply to the whole of the East Suffolk Council area, excluding the parts of East Suffolk that are within the Broads National Park, for which the Broads Authority is the local planning authority.

In some circumstances a Supplementary Planning Document could have significant environmental effects and may fall within the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 and so require Strategic Environmental Assessment.

This screening report is designed to test whether or not the contents of the Rural Development Supplementary Planning Document require a full Strategic Environmental Assessment (SEA). The legislative background below outlines the regulations that require the use of this screening exercise. Section 4 provides a screening assessment of the likely significant effects of the SPD and the need for a full SEA. This SEA report reviews an early draft of the Rural Development Supplementary Planning Document (SPD).

2. Legislative Background

The basis for Strategic Environmental Assessment legislation is European Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the Environment'. This document is also known as the Strategic Environmental Assessment (or SEA) Directive. European Directive 2001/42/EC was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations.

The SEA Regulations include a definition of 'plans and programmes' to which the regulations apply. SEA requirements relate to plans or programmes which are subject to preparation or adoption by an authority at national, regional or local level, which includes those prepared for town and country planning and land use. SEA is required where the plan or programme is likely to have significant environmental effects. It is therefore necessary to screen the SPD to identify whether significant environmental effects are likely. Where

screening identifies significant environmental effects, a full Strategic Environmental Assessment is required.

3. Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC

The preparation of the SPD triggers a requirement to determine whether it is likely to have a significant environmental effect. This requirement is discharged by the 'responsible authority' being the authority by which or on whose behalf the plan is prepared. Before making a determination, the responsible authority shall: -

- a) Take into account the criteria specified in Schedule 1 to the Regulations;
and
- b) Consult the consultation bodies.

The consultation bodies are defined in section 4 of the SEA Regulations. The opinions from the statutory consultation bodies: Historic England, the Environment Agency and Natural England, are therefore to be taken into account. All three consultation bodies were consulted on a draft screening opinion in September 2023 and their responses are appended to this report in Appendix 1.

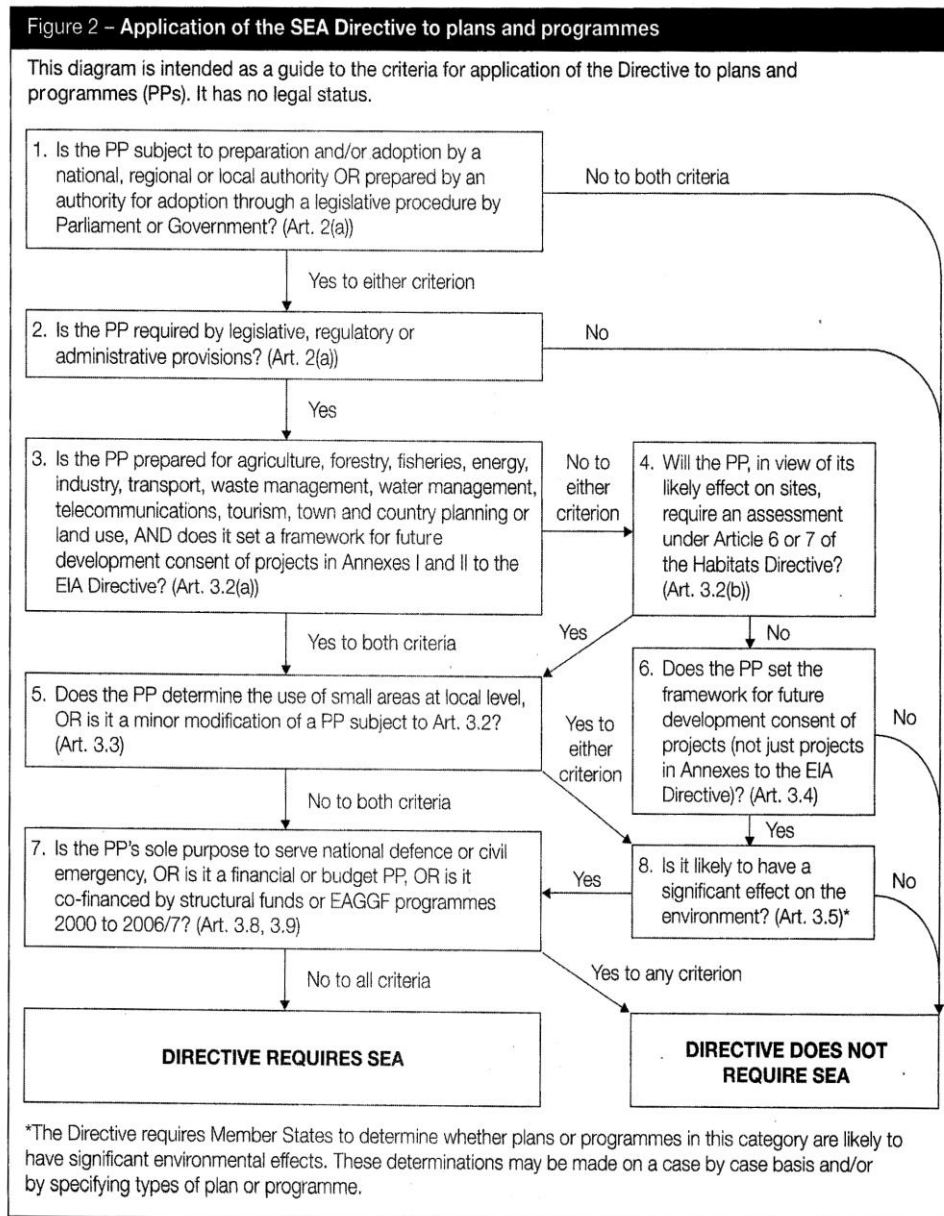
Schedule 1 of the SEA Regulations sets out the criteria for determining likely significant effects as follows:

1. The characteristics of plans and programmes, having regards, in particular to:
 - a. The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.
 - b. The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.
 - c. The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.

- d. Environmental problems relevant to the plan or programme.
 - e. The relevance of the plan or programme for the implementation of community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:
- a. The probability, duration, frequency and reversibility of the effects.
 - b. The cumulative nature of the effects.
 - c. The trans boundary nature of the effects.
 - d. The risks to human health or the environment (e.g. due to accidents).
 - e. The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),
 - f. the value and vulnerability of the area likely to be affected due to:
 - i. special natural characteristics or cultural heritage;
 - ii. exceeded environmental quality standards or limit values;
 - iii. intensive land-use; and
 - g. the effects on areas or landscapes which have a recognised national, community or international protection status.

4. Assessment

The diagram below illustrates the process for screening a planning document to ascertain whether a full SEA is required.



Source: A Practical Guide to the Strategic Environmental Assessment Directive (2005)

The following assessment applies the questions from the preceding diagram. The answers determine whether the Supplementary Planning Document will require a full Strategic Environmental Assessment.

1. Is the PP subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))

Yes. The preparation and adoption of the draft Rural Development Supplementary Planning Document (SPD) is being carried out by East Suffolk Council. The SPD is being produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))

Yes. The production of the SPD forms part of the delivery of the statutory Development Plan and the process for preparing SPDs is set out in the Town and Country Planning (Local Development) (England) Regulations 2012 and relates to the administration of the Council's planning service.

3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))

The SPD is prepared in support of the delivery of town and country planning and land use policies.

The SPD will not set a framework for the future consent of projects listed in Annexes I and II of the EIA Directive.

4. Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))

A separate screening exercise has been carried out under the Habitats Directive (92/43/EEC) and Conservation of Habitats and Species Regulations (2017) (as amended). This has determined that a full Appropriate Assessment is not required.

5. Does the PP determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)

Not applicable (based on the responses to questions 3 and 4 above).

6. Does the PP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3(4))

Yes. The draft Rural Development Supplementary Planning Document will be a material consideration in the determination of planning applications and will be applied alongside the policy framework provided by the Local Plans.

7. Is the PP's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)

No. Not applicable.

8. Is it likely to have a significant effect on the environment? (Art. 3(5))

No. The guidance contained in the Rural Development Supplementary Planning Document will provide information and advice concerning the implementation of the Council's Local Plan policies that relate to 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. The SPD will provide guidance on a number of policies within both the Suffolk Coastal Local Plan and the Waveney Local Plan. It is unlikely that the SPD will have a significant impact upon the environment. All policies within both Local Plans have been subject to a full Sustainability Appraisal, incorporating the requirements for Strategic Environmental Assessment.

5. Conclusion

The Rural Development Supplementary Planning Document will support the implementation of policies in the East Suffolk Council - Suffolk Coastal Local Plan (adopted September 2020) and the East Suffolk Council - Waveney Local Plan (adopted March 2019) which were both subject to Sustainability Appraisal including Strategic Environmental Assessment.

It is considered by East Suffolk Council that it is not necessary for a Strategic Environmental Assessment to be undertaken of the draft Rural Development Supplementary Planning Document to ensure compliance with SEA legislation.

Historic England, the Environment Agency and Natural England were consulted on a draft screening opinion in August 2023. Their responses are appended to this report in Appendix 1. The responses agreed with the conclusion that it is not necessary for a Strategic Environmental Assessment to be undertaken of the draft Rural Development Supplementary Planning Document.

Signed:  Dated: 13 November 2023

Andrea McMillan
Planning Manager (Policy, Delivery and Specialist Services)
East Suffolk Council

Appendix 1: Responses from Statutory Consultees

Environment Agency response



Laura Munday
East Suffolk Council
East Suffolk House Station Road
Melton
Woodbridge
IP12 1RT

Our ref: AE/2023/128651/01-L01
Your ref: Rural development SPD
SEA
Date: 15 September 2023

Dear Laura

DRAFT RURAL DEVELOPMENT SPD SEA SCREENING

EAST SUFFOLK COUNCIL AREA

Thank you for consulting us on the Screening report of the SEA for the Rural Development SPD. We have reviewed the SEA Screening report as submitted and can confirm that we do not disagree with the conclusion reached within the report.

This document provides supplementary information and guidance to rural development and thus we agree with the conclusion reached that there is likely not to be significant environmental impacts.

We trust this advice is useful.

Yours sincerely

Mr Giles Ward
Planning Officer

Direct e-mail [REDACTED]

Historic England Response

RE: ESC Rural Development SPD SEA Screening



Marsh, Andrew [REDACTED]
To Laura Mundy
Cc Marsh, Andrew



Wed 16/08/2023 09:34

Follow up. Start by 25 August 2023. Due by 25 August 2023.

Dear Laura,

Re: ESC Rural Development SPD SEA Screening

Thank you for consulting Historic England on the ESC Rural Development SPD SEA Screening. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully considered at all stages and levels of the local planning process. Therefore, we welcome the opportunity to comment on the consultation document at this stage.

Having reviewed the SPD and the screening opinion I can confirm that we support the Council's conclusion that it is not necessary for a Strategic Environmental Assessment to be undertaken of the draft Rural Development Supplementary Planning Document to ensure compliance with SEA legislation. I hope that this helps.

I would be grateful if you would confirm receipt of this email.

Best wishes,

Andrew Marsh BSc MA MRTPI
Historic Environment Planning Adviser
Development Advice | East of England
Historic England
Mobile [REDACTED]
Direct line: [REDACTED]

Historic England
Brooklands | 24 Brooklands Avenue | Cambridge | CB2 8BU
www.historicengland.org.uk

Natural England Response

East Suffolk Council - Rural Development Supplementary Planning Document: SEA & HR...



SM-NE-Consultations (NE [redacted])
To Laura Mundy



Thu 10/08/2023 16:15

Follow up. Start by 25 August 2023. Due by 25 August 2023.

Dear Laura Mundy,

Our ref: 444620

East Suffolk Council - Rural Development Supplementary Planning Document: SEA & HRA Screening Consultation

Thank you for your consultation on the above dated 3 August 2023.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is not able to provide specific advice on this document and therefore has no comment to make on its details.

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

Should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

Yours sincerely,

Dominic Rogers
Consultations Team
Natural England
Hornbeam House, Electra Way
Crewe, Cheshire, CW1 6GJ

Enquiries line: [redacted]

Email: [redacted]

www.gov.uk/natural-england





Habitats Regulations Assessment Screening Statement

Draft Rural Development Supplementary Planning Document

November 2023

Contents

1. Introduction	1
2. Protected sites covered by this report	1
3. Rural Development Supplementary Planning Document	1
4. Other Plans and Projects	1
5. Assessment of likely significant effects of the Draft Rural Development Supplementary Planning Document (SPD) on Habitat sites.....	3
7. Summary and conclusions	10
Appendix 1: Sources of background information	11
Appendix 2: Locations of Habitat sites	12
Habitat sites within 20km of the East Suffolk Council- Waveney Local Plan Area	12
Habitat sites within 20km of the East Suffolk Council- Suffolk Coastal Local Plan Area	16
Appendix 3: Relevant Habitat sites	20
Appendix 4: Natural England Consultation Response.....	30

1. Introduction

- 1.1 The Conservation of Habitats and Species Regulations (2017) (as amended) provide protection for sites that are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species. The network consists of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Both types can also be referred to as European Sites. The National Planning Policy Framework (NPPF) states that Ramsar sites should be afforded the same level of protection and refers to SACs, SPAs and Ramsar sites as ‘Habitat Sites’.
- 1.2 The requirement to undertake Habitats Regulation Assessment (HRA) of plans and projects is set out in the Conservation of Habitats and Species Regulations (2017) (as amended).
- 1.3 Regulation 105 of the Conservation of Habitats and Species Regulations (2017) states:
- ‘Where a land use plan:
- (a) Is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and
 - (b) Is not directly connected with or necessary to the management of the site, The plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site’s conservation objectives.’
- 1.4 The HRA is therefore undertaken in stages and should conclude whether or not a proposal or policy would adversely affect the integrity of any sites.

Stage 1: Determining whether a plan is likely to have a significant effect on a European site. This needs to take account of the likely impacts in combination with other relevant plans and projects. This assessment should be made using the precautionary principle. The screening assessment must reflect the outcomes of the 2018 judgement of the Court of Justice of the European

Union¹, which has ruled that where mitigation is necessary this must be identified through an Appropriate Assessment.

Stage 2: Carrying out Appropriate Assessment and ascertaining the effect on site integrity. The effects of the plan on the conservation objectives of sites should be assessed, to ascertain whether the plan has an adverse effect on the integrity of a European site.

Stage 3: Identifying mitigation measures and alternative solutions. The aim of this stage is to find ways of avoiding or significantly reducing adverse impacts, so that site integrity is no longer at risk. If there are still likely to be negative impacts, the option should be dropped, unless exceptionally it can be justified by imperative reasons of overriding public interest.

1.5 The draft Rural Development Supplementary Planning Document (SPD) is being produced by East Suffolk Council. The SPD will apply to the whole of the East Suffolk Council area, outside of the Broads. This report considers whether there are likely to be significant effects on protected Habitat sites and where a full Appropriate Assessment may be required.

1.6 East Suffolk (outside of the Broads) is covered by two Local Plans, the East Suffolk Council - Suffolk Coastal Local Plan adopted September 2020 and the Waveney Local Plan adopted March 2019.

1.7 Both Local Plans were subject to Habitats Regulations Assessment as part of their production. Where screening identified a likely significant effect, Appropriate Assessment was undertaken and the mitigation measures identified were incorporated within the Plans, resulting in conclusions that the plans will not lead to any adverse effects on Habitat sites within and in the vicinity of the (then) Suffolk Coastal and Waveney Districts. Both Appropriate Assessments identified recreational disturbance particularly from dog walkers as a significant effect. The Council has subsequently produced a Recreational Avoidance and Mitigation Strategy (RAMS) and requires payment towards

¹ C-323/17 – People over Wind, Peter Sweetman v Coillte Teoranta

mitigation from residential developments within 13km of the protected Habitat sites.

2. Protected sites covered by this report

- 2.1 Sites included in this assessment are listed in Table 1. This includes all sites that are within 20km of East Suffolk. The locations of the sites are shown on maps in Appendix 2 and the Qualifying Features and Conservation Objectives of the sites are contained in Appendix 3, along with a summary of the pressures and threats as documented in the Appropriate Assessments for the Local Plans.

Table 1: Relevant Habitat sites

Name
Alde-Ore and Butley Estuaries SAC,
Alde-Ore Estuary SPA, Ramsar
Benacre to Easton Bavents SPA
Benacre to Easton Bavents Lagoons SAC
Breydon Water SPA, Ramsar
Broadland SPA, Ramsar
Deben Estuary SPA, Ramsar
Dew's Ponds SAC
Great Yarmouth North Denes SPA
Haisborough, Hammond and Winterton SAC
Minsmere to Walberswick Heaths & Marshes SAC
Minsmere – Walberswick SPA, Ramsar
Norfolk Valley Fens SAC
Outer Thames Estuary SPA
Orfordness – Shingle Street SAC
Sandlings SPA
Southern North Sea SAC
Staverton Park and The Thicks, Wantisden SAC
Stour and Orwell Estuaries SPA, Ramsar
The Broads SAC
Winterton-Horsey Dunes SAC

3. Rural Development Supplementary Planning Document

- 3.1 This HRA report reviews the draft Rural Development Supplementary Planning Document (SPD).
- 3.2 The draft Rural Development SPD provides information and advice concerning the implementation of the Council’s Local Plan policies that relate to 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. The guidance contained in the draft SPD will assist in the implementation of Local Plan and Neighbourhood Plan policies for East Suffolk. The SPD, when adopted, will be a material consideration in the determination of applications for planning permission. The SPD does not cover parts of East Suffolk that are within the Broads, for which the Broads Authority is the local planning authority.
- 3.3 The introduction to the SPD explains the policy context, the purpose of the SPD, and some information about the preparation of the SPD. As this section is descriptive it has not been included in the screening table in section 5 of this report.
- 3.4 Other chapters in the SPD provide detailed guidance on different aspects of rural development. These chapters cover a number of aspects and considerations, including: rural workers dwellings, annexes, residential curtilages, rural buildings and barn conversions, economic development, equestrian development, tourism, renewable energy generation, wastewater management.

4. Other Plans and Projects

- 4.1 Regulation 105 of the Habitats Regulations requires consideration to be given to whether a Plan will have an effect either alone or in combination with other plans or projects.
- 4.2 As noted in the introduction, the other key plans are the Local Plans. The Local Plans set out the broad scale and distribution of development across the area of East Suffolk formerly covered by Suffolk Coastal District and Waveney District.
- 4.3 The draft Rural development Supplementary Planning Document (SPD) adds specific detail a number of policies within the Suffolk Coastal Local Plan and the Waveney Local Plan:

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: Conversion 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 and Heritage Coast
- 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

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

4.4 A screening process considered each policy in the Suffolk Coastal and Waveney Local Plans and concluded whether significant effects were likely and if Appropriate Assessment was therefore needed. The Appropriate Assessments of the Suffolk Coastal and Waveney Local Plans considered the following themes:

- Recreation pressure,
- Air quality and traffic emissions,
- Biodiversity net gain,
- Urbanisation,
- Water quality, resources and treatment, and
- Flood risk and coastal erosion.

4.5 Mitigation measures were identified within the Appropriate Assessments and incorporated within both Local Plans, resulting in a conclusion that neither plan would lead to any adverse effects on Habitat sites within and in the vicinity of the (then) Suffolk Coastal and Waveney Districts.

5. Assessment of likely significant effects of the Draft Rural Development Supplementary Planning Document (SPD) on Habitat sites

- 5.1 Table 3 below considers each relevant section of the draft Rural Development Supplementary Planning Document (SPD) in relation to whether there is potential for a likely significant effect on protected Habitat sites. This constitutes Stage 1 as set out under paragraph 1.4 above. Consideration is given to the characteristics and location of the protected sites. The relevant sections are considered within the context of the Local Plan policies from which they hang and which have themselves been subject to Habitats Regulations Assessment, as set out in section 4 above.

Table 3: Likely significant effects of the Draft Rural Development Supplementary Planning Document

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
Rural Workers Dwellings	<p>This chapter sets out circumstances when rural workers dwelling may be permitted. Including information relating to evidence requirements, design and the use of occupancy conditions. The guidance is clear that the use of this policy must not result in a proliferation of housing in the countryside.</p> <p>The guidance contained here clarifies the approach to rural workers dwellings but does not in itself promote new development beyond what is permissible under the Local Plan policy and will therefore not lead to likely significant effects on Habitat Sites.</p>	None	None	No
Rural Annexes	<p>This chapter clarifies the approach to the consideration of residential annexes in the countryside. It includes guidance around when planning permission may or may not be required and the design of annexes.</p>	None	None	No

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
	<p>The chapter provides further detail for those considering annex development. The guidance contained here does not in itself promote new development beyond what is accounted for in the Local Plan and will therefore not lead to likely significant effects on Habitat Sites.</p>			
<p>Rural Residential Curtilage Expansion</p>	<p>This chapter sets out guidance to explain which uses are regarded as residential and when planning permission is required for a change of use of land from agricultural to residential. It includes consideration of biodiversity impacts and clarifies that the primary objective of the Rural SPD is to protect and enhance the local ecology and biodiversity and that this will take precedence over extensions to residential curtilage.</p> <p>The guidance in this chapter seeks to minimise impacts on biodiversity and does not in itself promote new development and will therefore not lead to likely significant effects on Habitat Sites.</p>	<p>None</p>	<p>None</p>	<p>No</p>

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
Rural Buildings and Barn Conversions	<p>This chapter sets out guidance for the consideration of proposals to convert rural buildings and barns. It includes guidance on design, scale, heritage, landscape impacts, and biodiversity impacts (including ecological assessment requirements). It also includes guidance around the prior approval process and clarifies that the Habitat Directive and Habitat’s Regulations will apply to prior approval applications.</p> <p>The guidance in this chapter does not in itself promote new development beyond what is accounted for in Local Plan policy and will therefore not lead to likely significant effects on Habitat Sites.</p>	None	None	No
Economic Development	<p>This chapter explains the consideration of applications for economic development type uses in rural areas. It covers specific guidance on:</p> <ul style="list-style-type: none"> • Factories and Workshops • Development of Former Airfields • Storage and Distribution 	None	None	No

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
	<ul style="list-style-type: none"> • Farm Diversification • Dog Paddocks <p>as well as more general guidance including: location, access, amenity, design, and landscaping.</p> <p>The guidance in this chapter does not in itself promote new development beyond what is accounted for in Local Plan policy and will therefore not lead to likely significant effects on Habitat Sites.</p>			
Equestrian Development	<p>This chapter sets out the Council’s expectations regarding equestrian development proposals, including clarifying when planning permission is required. Guidance is provided in relation to wildlife and landscape impact, heritage impacts, access and environmental protection considerations.</p> <p>The guidance aims to support applicants and does not in itself promote new development beyond what is accounted for in Local Plan policy and will therefore not</p>	None	None	No

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
	lead to likely significant effects on Habitat Sites.			
Tourism	<p>This chapter sets out guidance regarding tourism uses in rural areas. It includes specific clarification of RAMS considerations in relation to tourism uses.</p> <p>The guidance in this chapter does not in itself promote new development beyond what is accounted for in Local Plan policy and will therefore not lead to likely significant effects on Habitat Sites.</p>	None	None	No
Small Scale Renewable Energy Generation	<p>This chapter provides guidance for applicants looking to develop small scale on-site renewable and low carbon energy generation in rural areas. It includes on guidance on whether planning permission is required.</p> <p>The guidance aims to support applicants and does not in itself promote new development and will therefore not lead to likely significant effects on Habitat Sites.</p>	None	None	No

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
Wastewater Management in Rural Areas	<p>This section provides guidance in relation to development in rural areas with no connection to the public sewerage system.</p> <p>The guidance aims to support applicants and does not in itself promote new development and will therefore not lead to likely significant effects on Habitat Sites.</p>	None	None	No

7. Summary and conclusions

- 7.1 The draft Rural Development Supplementary Planning Document (SPD) provides additional guidance to inform the determination of planning applications alongside the Waveney and Suffolk Coastal Local Plans. The draft Rural Development SPD provides further guidance and advice concerning the implementation of the Council's Local Plan policies that relate to development in rural areas. The guidance contained in the draft SPD will assist in the implementation of Local Plan and Neighbourhood Plan policies. The SPD, when adopted, will be a material consideration in the determining of applications for planning permission.
- 7.2 Implementation of the Rural Development Supplementary Planning Document will not lead to likely significant effects on protected Habitat sites.
- 7.3 Natural England were consulted on a draft of this Screening Statement as statutory nature conservation body and their views were taken into account in finalising this screening statement. Their response is contained in Appendix 4.

Signed:  Dated: 13 November 2023

Andrea McMillan
Planning Manager (Policy, Delivery and Specialist Services)
East Suffolk Council

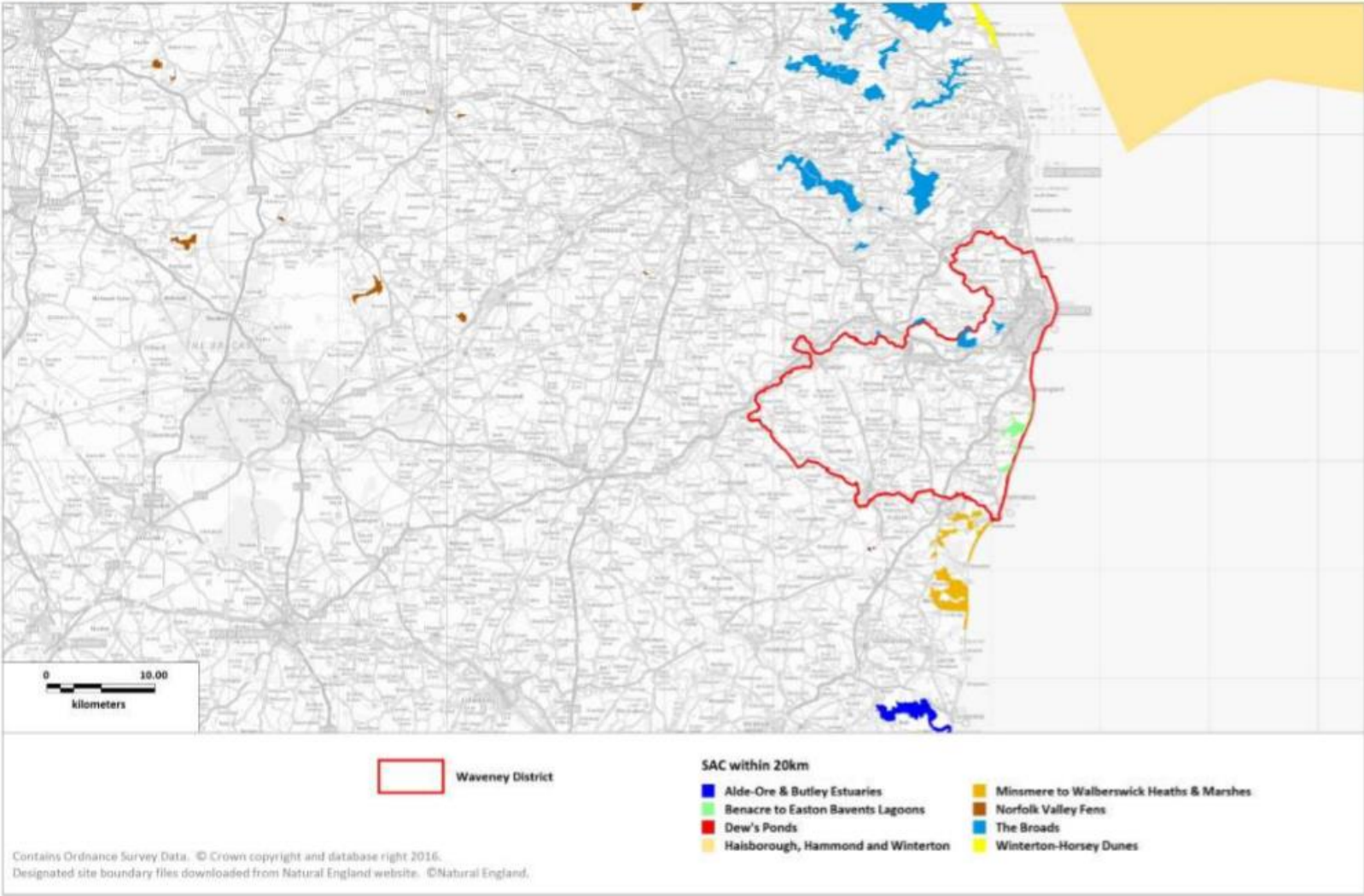
Appendix 1: Sources of background information

- East Suffolk Council – Suffolk Coastal Local Plan (September 2020)
- East Suffolk Council – Waveney Local Plan (March 2019)
- Habitats Regulations Assessment for the Suffolk Coastal Local Plan at Final Draft Plan stage (incorporating Main Modifications) (May 2020)
- The Habitats Regulations Assessment of the Waveney Local Plan (December 2018)
- Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils (May 2019)

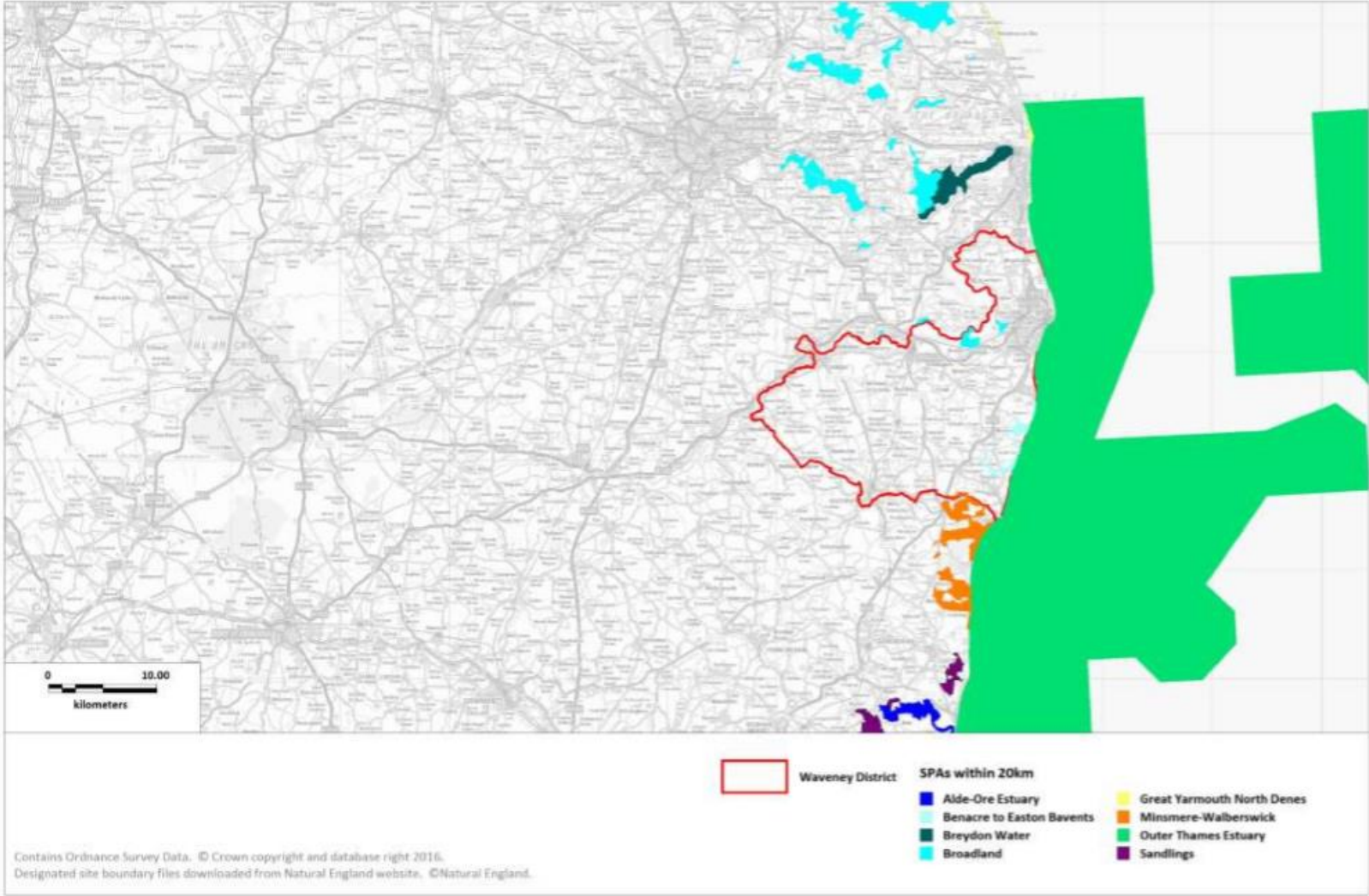
Appendix 2: Locations of Habitat sites

Habitat sites within 20km of the East Suffolk Council-
Waveney Local Plan Area

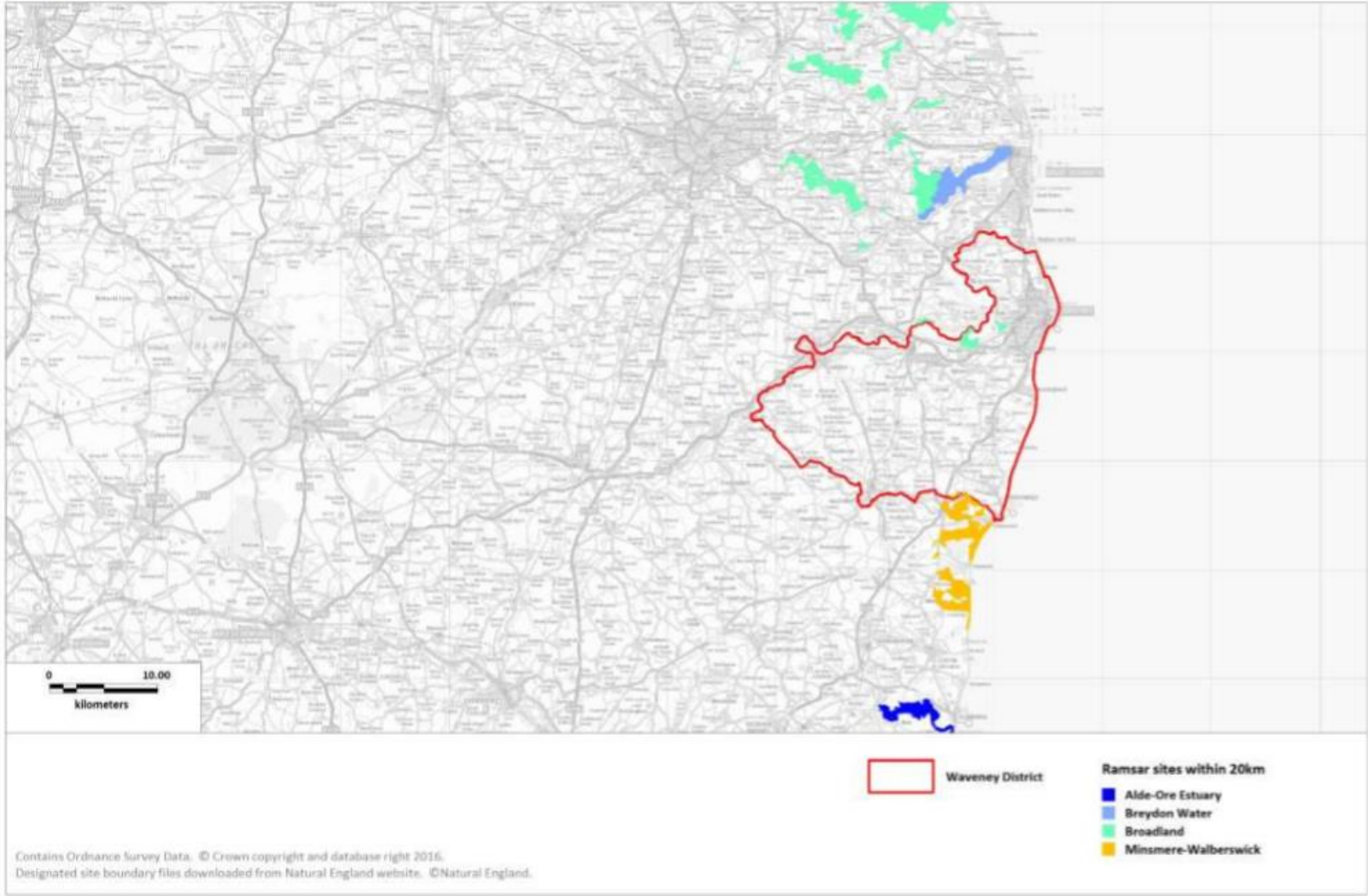
Map 1: SACs



Map 2: SPAs

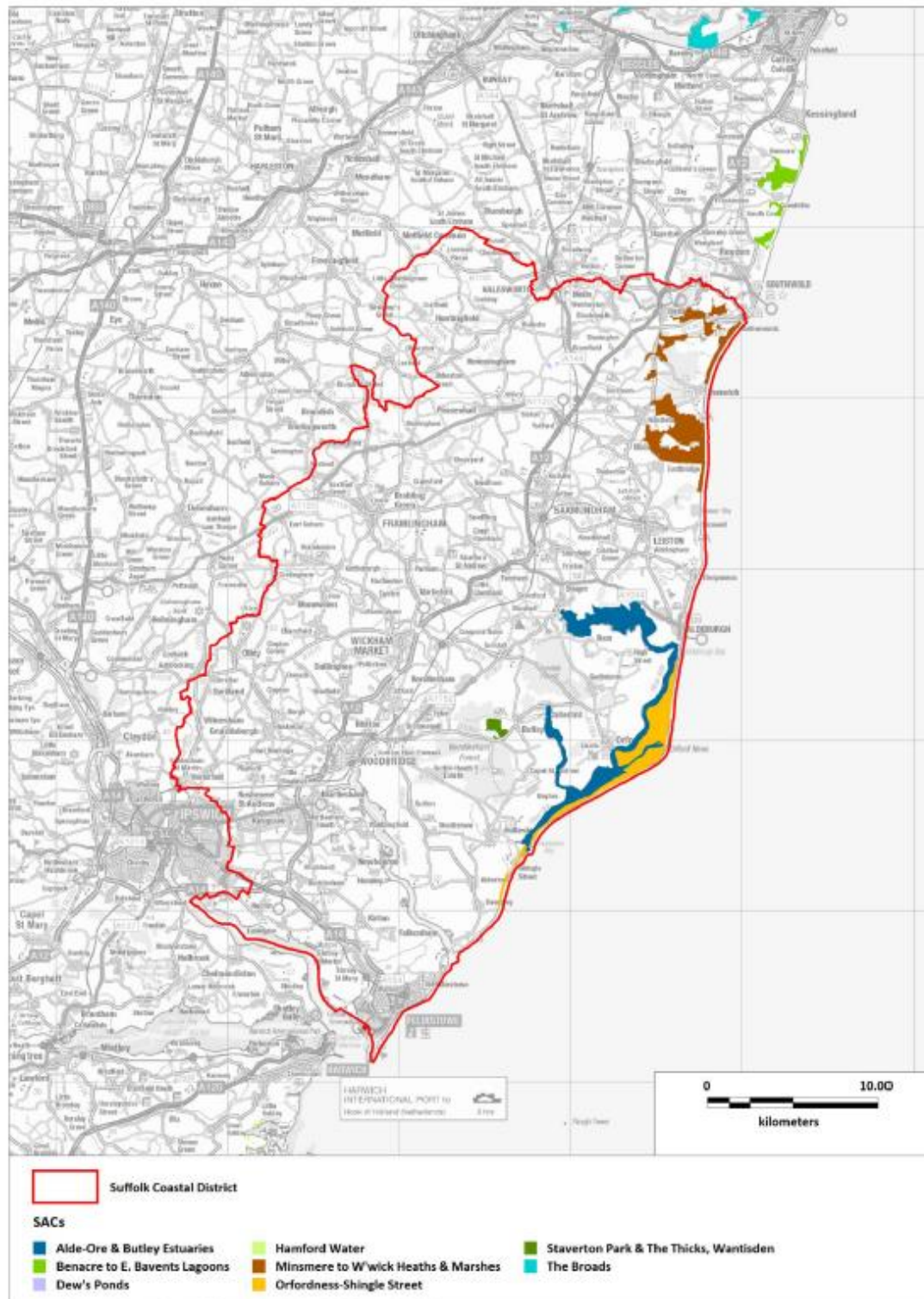


Map 3: Ramsar Sites



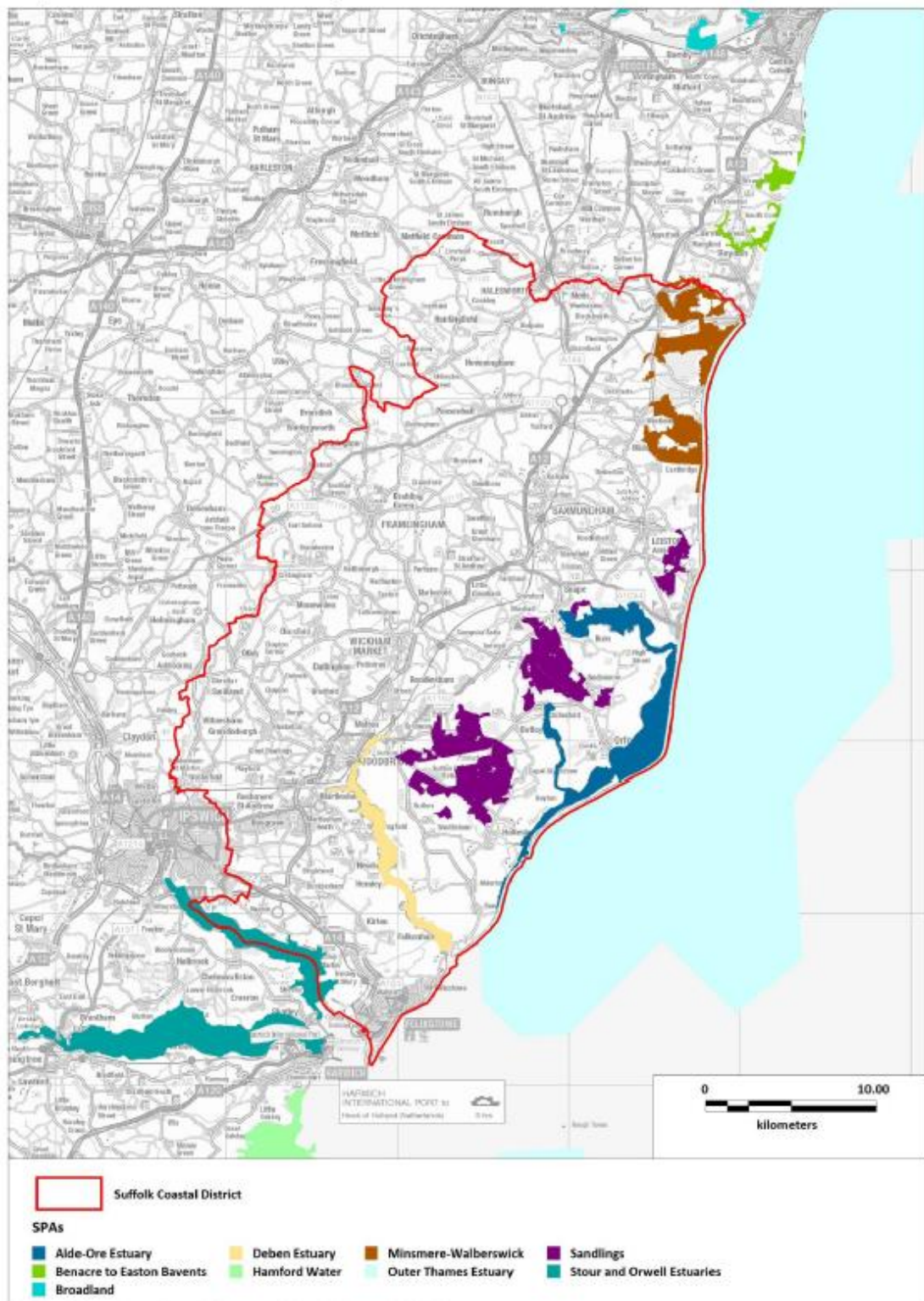
Habitat sites within 20km of the East Suffolk Council- Suffolk Coastal Local Plan Area

Map 1: SAC sites where boundary within 20km of Suffolk Coastal District



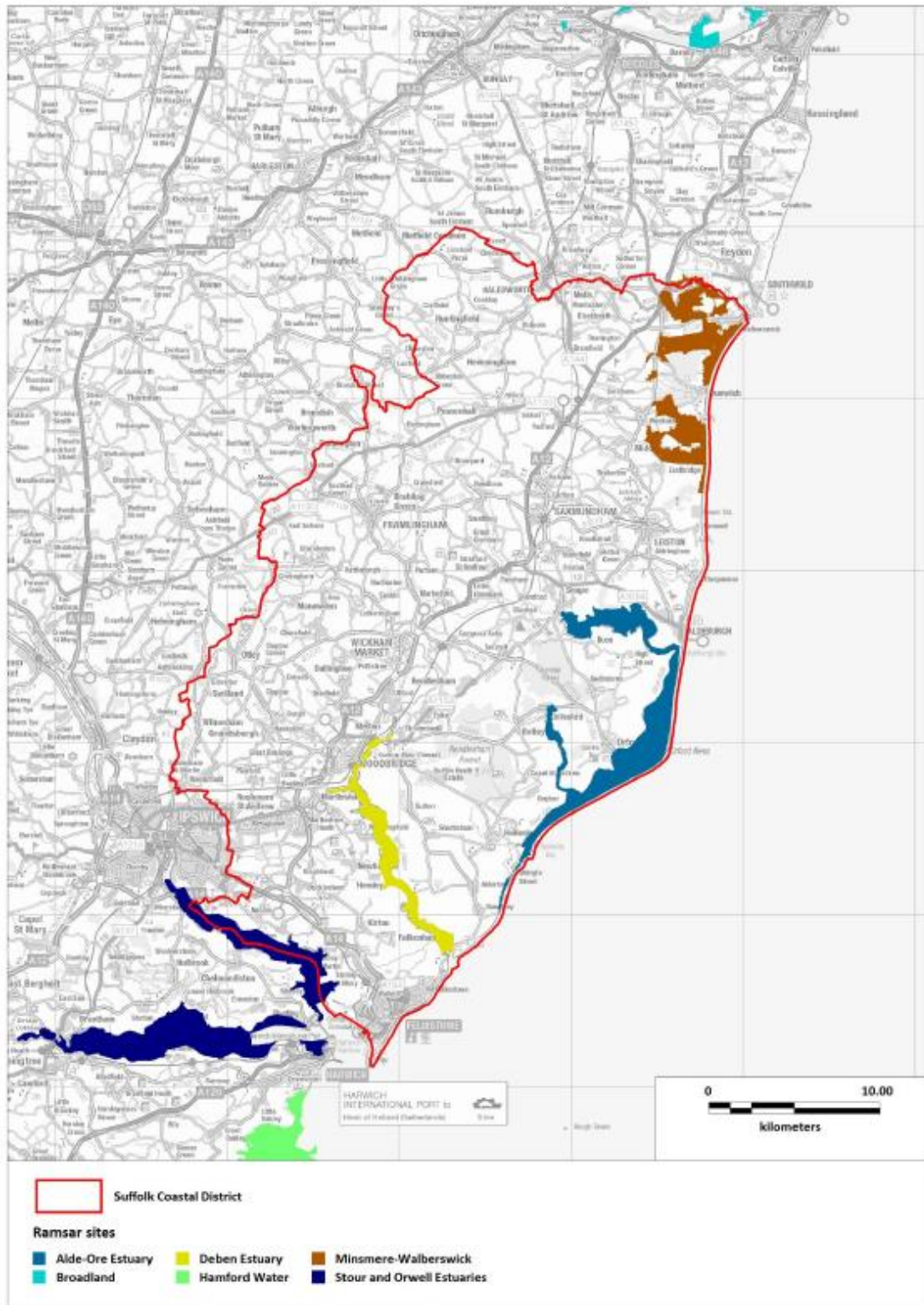
Contains Ordnance Survey Data. © Crown copyright and database right 2017.
 Contains Natural England information © Natural England and Database Right. All rights Reserved.

Map 2: SPA sites where boundary within 20km of Suffolk Coastal District



Contains Ordnance Survey Data. © Crown copyright and database right 2017.
 Contains Natural England Information © Natural England and Database Right. All rights Reserved.

Map 3: Ramsar sites where boundary within 20km of Suffolk Coastal District



Contains Ordnance Survey Data, © Crown copyright and database right 2017.
 Contains Natural England Information © Natural England and Database Right. All rights Reserved.

Appendix 3: Relevant Habitat sites

Name	Qualifying features	Conservation Objectives	Pressure and threats (as summarised in the Habitats Regulations Assessment for the Suffolk Coastal Local Plan at Final Draft Plan Stage (December 2018))
Special Areas of Conservation			
Alde-Ore and Butley Estuaries	H1130:Estuaries H1140: Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats H1330: Atlantic salt meadows	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; The supporting processes on which qualifying natural habitats rely.	Hydrological changes, public access/disturbance, inappropriate coastal management, coastal squeeze, inappropriate pest control, changes in species distributions, invasive species, air pollution, fisheries (commercial marine and estuarine) (Alde-Ore and Butley Estuaries SAC and Alde-Ore SPA)
Benacre to Easton Barents Lagoons	H1150# Coastal lagoons, A195(B) <i>Sterna albifrons</i> : Little tern A021(B) <i>Botaurus stellaris</i> : Great bittern A081(B) <i>Circus aeruginosus</i> : Eurasian marsh harrier	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats,	Public access/disturbance, water pollution, physical modification, changes in species distributions, fisheries (marine and estuarine).

		The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats rely.	
Dew's Ponds	S1166 Triturus cristatus: Great crested newt	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of the habitats of qualifying species, The structure and function of the habitats of qualifying species, The supporting processes on which the habitats of qualifying species rely, The populations of qualifying species, and, The distribution of qualifying species within the site.	None identified
Minsmere to Walberswick Heaths and Marshes	H4030 European dry heaths H1210 Annual vegetation of drift lines H1220 Perennial vegetation of stony banks A052(B) Anas crecca: Eurasian teal A021(B) Botaurus stellaris: Great bittern A081(B) Circus aeruginosus: Eurasian marsh harrier	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats and habitats,	Coastal squeeze, public access/disturbance, changes in species distributions, invasive species, inappropriate pest control, air pollution, water pollution, deer, fisheries (commercial marine and estuarine)

	<p>A082(NB) Circus cyaneus: Hen harrier A224(B) Caprimulgus europaeus: European nightjar A056(B) Anas clypeata: Northern shoveler A056(NB) Anas clypeata: Northern shoveler A051(B) Anas strepera: Gadwall A051(NB) Anas strepera: Gadwall A132(B) Recurvirostra avosetta: Pied avocet A195(B) Sterna albifrons: Little tern A394(NB) Anser albifrons albifrons: Greater white-fronted goose</p>	<p>The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats rely.</p>	
<p>Orfordness – Shingle Street</p>	<p>H1150: Coastal Lagoons H1210: Annual vegetation of drift lines H1220: Perennial vegetation of stony banks; Coastal shingle vegetation outside the reach of waves</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; and The supporting processes on which qualifying natural habitats rely.</p>	<p>Not identified in Suffolk Coastal Final Draft Local Plan HRA.</p>

<p>Staverton Park and The Thicks, Wantisden</p>	<p>H9190: Old acidophilous oak woods with <i>Quercus robur</i> on sandy plains; Dry oak-dominated woodland.</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; and The supporting processes on which qualifying natural habitats rely.</p>	<p>Woodland management, disease, atmospheric pollution.</p>
<p>The Broads</p>	<p>H7210# Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i> S1016 <i>Vertigo moulinsiana</i>: Desmoulin's whorl snail H7230 Alkaline fens H6410 <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) H91E0# Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>) H7140 Transition mires and quaking bogs</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats and habitats of qualifying species, The structure and function (including typical species) of qualifying natural habitats, The structure and function of the habitats of qualifying species, The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely,</p>	<p>Water pollution, climate change, invasive species, siltation, inappropriate water levels, hydrological changes, water abstraction, change in land management, inappropriate ditch management, inappropriate scrub control, changes in species distributions, public access/disturbance, undergrazing, drainage, direct impact from 3rd party</p>

	<p>H3140 Hard oligo-mesotrophic waters with benthic vegetation of Chara spp</p> <p>H3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition-type vegetation</p> <p>S1355 Lutra lutra: Otter</p> <p>S1903 Liparis loeselii: Fen orchid</p> <p>S4056 Anisus vorticulus: Little ramshorn whirlpool snail</p>	<p>The populations of qualifying species, and, The distribution of qualifying species within the site.</p>	
Special Protection Areas			
<p>Alde-Ore Estuary (also Ramsar site)</p>	<p>A081: Eurasian marsh harrier (breeding)</p> <p>A132: Pied avocet (non-breeding)</p> <p>A132: Pied avocet (breeding)</p> <p>A151: Ruff (non-breeding)</p> <p>A162: Common redshank (non-breeding)</p> <p>A183: Lesser black-backed gull (breeding)</p> <p>A191: Sandwich tern (breeding)</p> <p>A195: Little tern (breeding)</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:</p> <p>The extent and distribution of the habitats of the qualifying features;</p> <p>The structure and function of the habitats of the qualifying features;</p> <p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The population of each of the qualifying features; and</p> <p>The distribution of the qualifying features within the site.</p>	<p>Hydrological changes, public access/disturbance, inappropriate coastal management, coastal squeeze, inappropriate pest control, changes in species distributions, invasive species, air pollution, fisheries (commercial marine and estuarine)</p> <p>(Alde-Ore and Butley Estuaries SAC and Alde-Ore SPA)</p>
<p>Benacre to Easton Bvents</p>	<p>H1150# Coastal lagoons, A195(B) Sterna albifrons: Little tern</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to</p>	<p>Public access/disturbance, water pollution, physical modification, changes</p>

	<p>A021(B) <i>Botaurus stellaris</i>: Great bittern A081(B) <i>Circus aeruginosus</i>: Eurasian marsh harrier</p>	<p>achieving the aims of the Wild Birds Directive, by maintaining or restoring; The extent and distribution of the habitats of the qualifying features, The structure and function of the habitats of the qualifying features, The supporting processes on which the habitats of the qualifying features rely, The population of each of the qualifying features, and, The distribution of the qualifying features within the site.</p>	<p>in species distributions, fisheries (marine and estuarine).</p>
<p>Broadlands (also Ramsar site)</p>	<p>H7210# Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i> S1016 <i>Vertigo moulinsiana</i>: Desmoulin's whorl snail H7230 Alkaline fens H6410 <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) H91E0# Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>) H7140 Transition mires and quaking bogs H3140 Hard oligo-mesotrophic waters with benthic vegetation of <i>Chara</i> spp</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats and habitats of qualifying species, The structure and function (including typical species) of qualifying natural habitats, The structure and function of the habitats of qualifying species, The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely, The populations of qualifying species, and,</p>	<p>Water pollution, climate change, invasive species, siltation, inappropriate water levels, hydrological changes, water abstraction, change in land management, inappropriate ditch management, inappropriate scrub control, changes in species distributions, public access/disturbance, undergrazing, drainage, direct impact from 3rd party</p>

	H3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition-type vegetation S1355 Lutra lutra: Otter S1903 Liparis loeselii: Fen orchid S4056 Anisus vorticulus: Little ramshorn whirlpool snail	The distribution of qualifying species within the site.	
Deben Estuary (also Ramsar site)	A046a: Dark bellied brent goose (non-breeding) A132: Pied avocet (non-breeding)	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: The extent and distribution of the habitats of the qualifying features; The structure and function of the habitats of the qualifying features; The supporting processes on which the habitats of the qualifying features rely; The population of each of the qualifying features; and The distribution of the qualifying features within the site.	Coastal squeeze, disturbance to birds, water and air pollution.
Outer Thames Estuary	A001: Red-throated Diver (Non-breeding) A195: Common Tern (Breeding) A193: Little Tern (Breeding)	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: The extent and distribution of the habitats of the qualifying features;	Not identified in Suffolk Coastal Final Draft Local Plan HRA. SIP identifies fisheries.

		<p>The structure and function of the habitats of the qualifying features; The supporting processes on which the habitats of the qualifying features rely; The population of each of the qualifying features; and The distribution of the qualifying features within the site.</p>	
<p>Minsmere to Walberswick (also Ramsar site)</p>	<p>H4030 European dry heaths H1210 Annual vegetation of drift lines H1220 Perennial vegetation of stony banks A052(B) Anas crecca: Eurasian teal A021(B) Botaurus stellaris: Great bittern A081(B) Circus aeruginosus: Eurasian marsh harrier A082(NB) Circus cyaneus: Hen harrier A224(B) Caprimulgus europaeus: European nightjar A056(B) Anas clypeata: Northern shoveler A056(NB) Anas clypeata: Northern shoveler A051(B) Anas strepera: Gadwall A051(NB) Anas strepera: Gadwall</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; The extent and distribution of the habitats of the qualifying features, The structure and function of the habitats of the qualifying features, The supporting processes on which the habitats of the qualifying features rely, The population of each of the qualifying features, and, The distribution of the qualifying features within the site.</p>	<p>Coastal squeeze, public access/disturbance, changes in species distributions, invasive species, inappropriate pest control, air pollution, water pollution, deer, fisheries (commercial marine and estuarine)</p>

	<p>A132(B) <i>Recurvirostra avosetta</i>: Pied avocet A195(B) <i>Sterna albifrons</i>: Little tern A394(NB) <i>Anser albifrons albifrons</i>: Greater white-fronted goose</p>		
Outer Thames Estuary	<p>A001 (W) <i>Gavia stellata</i> Red-throated Diver A195 (B) <i>Sterna hirundo</i> Common Tern A193 (B) <i>Sternula albifrons</i> Little Tern</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; The extent and distribution of the habitats of the qualifying features, The structure and function of the habitats of the qualifying features, The supporting processes on which the habitats of the qualifying features rely, The population of each of the qualifying features, and, The distribution of the qualifying features within the site.</p>	<p>Not identified in Suffolk Coastal Final Draft Local Plan HRA. SIP identifies fisheries.</p>
Sandlings	<p>A224: European nightjar (breeding) A246: Woodlark (breeding)</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: The extent and distribution of the habitats of the qualifying features;</p>	<p>Changes in species distributions, inappropriate scrub control, deer, air pollution, public access/disturbance.</p>

		<p>The structure and function of the habitats of the qualifying features; The supporting processes on which the habitats of the qualifying features rely; The population of each of the qualifying features; and The distribution of the qualifying features within the site.</p>	
<p>Stour and Orwell Estuaries (also Ramsar site)</p>	<p>A046a: Dark bellied brent goose (non-breeding) A054: Northern pintail (non-breeding) A132: Pied avocet (non-breeding) A141: Grey plover (non-breeding) A143: Red knot (non-breeding) A149: Dunlin (non-breeding) A156: Black-tailed godwit (non-breeding) A162: Common redshank (non-breeding) Waterbird assemblage</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: The extent and distribution of the habitats of the qualifying features; The structure and function of the habitats of the qualifying features; The supporting processes on which the habitats of the qualifying features rely; The population of each of the qualifying features; and The distribution of the qualifying features within the site.</p>	<p>Coastal squeeze, disturbance to birds, air pollution and new development.</p>

Appendix 4: Natural England Consultation Response

East Suffolk Council - Rural Development Supplementary Planning Document: SEA & HR...



SM-NE-Consultations (NE)

To Laura Mundy



Reply

Reply All

Forward



Thu 10/08/2023 16:15

Follow up. Start by 25 August 2023. Due by 25 August 2023.

Dear Laura Mundy,

Our ref: 444620

East Suffolk Council - Rural Development Supplementary Planning Document: SEA & HRA Screening Consultation

Thank you for your consultation on the above dated 3 August 2023.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is not able to provide specific advice on this document and therefore has no comment to make on its details.

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

Should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

Yours sincerely,

Dominic Rogers
Consultations Team
Natural England
Hornbeam House, Electra Way
Crewe, Cheshire, CW1 6GJ

Enquiries line:

Email:

www.gov.uk/natural-england





Committee	Cabinet
Date	09/04/2024
Subject	East Suffolk Property Investments Limited – Revised Business Case
Cabinet Member	Councillor Vince Langdon-Morris, Cabinet Member for Resources Councillor David Beavan, Deputy Leader and Cabinet Member for Housing
Report Author & Director	Andy Jarvis Strategic Director andrew.jarvis@east Suffolk.gov.uk

Key Decision?	No
Is the report Open or Exempt?	OPEN

Category of Exempt Information and reason why it is NOT in the public interest to disclose the exempt information.	Not applicable
---	----------------

Purpose/Summary

This report outlines a proposal to present a revised business case for East Suffolk Property Investments Limited (ESPIL) and seeks Cabinet's support to progress with its development.

Recommendation(s)

That Cabinet:

Considers the proposal to produce a revised business case for ESPIL and supports its production on the timetable set out in section 3.4 of this report.

Strategic plan

How does this proposal support Our Direction 2028?

Environmental Impact	ESPIL will have policies and operating practices that will assist the Council to achieve its Environmental Policy.
Sustainable Housing	The company will ensure that accommodation provided is of good quality, meeting all legislative requirements therefore allowing residents to live in safe, suitable and affordable accommodation.
Tackling Inequalities	There is currently a housing crisis, with more people requiring housing than can access it. The company seeks to provide homes that people can afford to live in.
Thriving Economy	If development of the business case envisaged by this report is supported, in time the company's trading activities will involve the use of local supplies and services and will thereby contribute to a thriving local economy.
Our Foundations / governance of the organisation	The governance arrangements for each of the council's companies are set out within the Shareholder Agreement.

Justification for recommendations

1. Background

- 1.1. East Suffolk Property Investments Limited (ESPIL), a subsidiary of East Suffolk Holdings Limited was incorporated in October 2019. The company sits within a Group structure and is one of the five Local Authority Trading Companies (LATCos) owned by East Suffolk Council.
- 1.2. In December 2022, Cabinet approved a business case for the company which was to progressively perform the following primary functions:
 - Purchase of residential properties
 - Renting of properties at market and sub-market rates.
 - Provision of property management services, including collection of rents
 - Provision of property maintenance services.
- 1.3. This business case was a requirement for ESPIL to be able to trade / operate.
- 1.4. However, despite having an approved business plan, development of ESPIL has not been pursued much further for two reasons. First, the company was to have been involved in the national Local Authority Housing Fund initiative. This would have seen the company use Government funding to acquire properties to help provide homes for displaced families from Ukraine and Afghanistan. Unfortunately, the conditions and restrictions within the scheme were such that participation was determined to be unviable locally and work on the scheme ceased. Second, the project work required to deliver the Council's primary LATCo East Suffolk Services Ltd (ESSL) on time was greater than originally envisaged and had to be made a priority given the ending of the then existing Joint Venture arrangement.
- 1.5. The above notwithstanding the Council's new strategic plan Our Direction 2028 provides a renewed focus on Sustainable Housing and the need for quality housing that people can afford to live in. ESPIL can contribute to this priority.

2. Introduction

- 2.1. Sustainable Housing is one of the four priorities of the Council's Strategic Plan 'Our Direction 2028', and as such provides a greater focus and a new impetus to find innovative ways to provide more quality homes that people in East Suffolk can afford to live in. As a LATCo, 100% owned by the Council and under its full control, ESPIL is one approach that can contribute significantly to the delivery of this priority. However, to give the best chance of success and in view of the time that has elapsed since the original ESPIL business case was approved, it is considered appropriate that a revised and up to date business case is required. If this is agreed, the business case will propose a steady start, with low fixed costs, capable of providing 'proof of concept' via an early review.

3. Proposal

- 3.1. It is proposed that ESPIL, funded by the Council initially to the tune of up to £5m (subject to approval of a business case) to enable it to set itself up, will purchase some five residential properties within the district, which it will then rent at open market rent for a financial return. The company will be designed to operate with minimal fixed costs and will be evaluated at the end of the first year. If operating successfully and demonstrating proof of concept, the intention would then be to provide further finance to enable the company to purchase additional properties on the same basis.
- 3.2. ESPIL will focus on delivering good quality accommodation initially for open market rent, and as it becomes established and builds an operating surplus it will work closely, but not exclusively, with the council on its temporary accommodation needs, potentially including furthering a local lettings initiative. In time, it is envisaged that the company will also be able to offer some properties at between Intermediate and open-market rent, so further helping to deliver the ambitions of Our Direction 2028.
- 3.3. The company will have high ethical standards. As it establishes itself within the local residential letting market as an exemplar lettings agency it will deliver high levels of all-round compliance and attention to resident safety. For example, it will regularly carry out Housing, Health and Safety Ratings (HHSRS) inspections on all its properties. This is something which is not currently a legal requirement.
- 3.4. Should Cabinet support the proposal to develop a revised business case for East Suffolk Property Investments Limited (ESPIL) along the lines set out above, this would be produced over the coming weeks and brought forward for the required approvals as set out in the timetable below.

Meeting	Date of Meeting	Deadline for receipt of report by Democratic Services	Detail
Cabinet	09 April 2024	25 March 2024	High level report outlining the intention, gain Cabinet support to progress
Shareholder Reference Group	04 June 2024	21 May 2024	Approval for the investment and business plan for ESPIL. These meetings are held on a quarterly basis, this is the earliest opportunity to take a report to the SRG.
Audit and Governance	08 July 2024	25 June 2024	Approval for the investment and business plan for ESPIL following the SRG approval. This is the next available meeting following the June SRG.
Cabinet	03 September 2024	20 August 2024	Approval of full business plan and investment

			including SRG approval and include A&G comments. There is a Cabinet meeting 09 July 2024, a) this does not allow for the inclusion of A&G comments and b) there is no Full Council Meeting in August.
Full Council	25 September 2024	12 September 2024	Approval to add the investment into the Capital Programme. The investment is a growth to the budget and due to the value will require Full Council approval.

4. Financial Implications

- 4.1. There will be financial implications for the Council to support the delivery of the revised business case for ESPIL.
- 4.2. There will be a requirement for the Council to fund the start-up of EPSIL and an expectation that the Council may need to provide support services to the company. The initial consideration is for the Council to provide up to £5m of funding to ESPIL.
- 4.3. The Council's external treasury advisors will be consulted on financing options for the Council to EPSIL, on completion of the business case.
- 4.4. Once financing options and associated implications for the Council have been identified a report will be brought back to Cabinet later in the year, with the required governance reporting also to the Audit & Governance Committee and the Shareholder Reference Group.
- 4.5. As per the outline proposal in Section 3 above, the initial approach is to start small and to evaluate performance before looking to expand ESPIL's operation further. This provides a financially cautious and less complex approach which enables a simpler exit strategy if the revised business case concept is not delivering as expected.

5. Legal Implications

- 5.1. Considerable legal advice was sought prior and during the setup of the Council's LATCo Group. This included the process that resulted in the incorporation of ESPIL. There are no legal implications arising from this report, but legal advice will be sought on the new business case as it is developed.

6. Risk Implications

- 6.1. The risks associated with the company and the purpose for which it has been set up will be set out within the revised business case.
- 6.2. Risks associated with any individual property purchase will be reviewed at the time.

7. Options

- 7.1. Do nothing – this would mean that ESPIL would remain inactive and would not be able to contribute to the Council’s Sustainable Housing priority.

8. Recommendations

- 8.1. That Cabinet considers the proposal to produce a revised business case for ESPIL and supports its production on the timetable set out in section 3.4 of this report.

9. Reasons for Recommendations

- 9.1. ESPIL could contribute significantly to the Council’s strategic housing aspirations. A measured targeted start would allow the early evaluation of performance and delivery of a proof of concept before looking to expand ESPIL’s operation further. This provides a financially cautious and less complex approach which enables a simpler exit strategy if the revised business case concept is not delivering as expected.

10. Conclusions/Next Steps

- 10.1. A small Programme Team will be created to manage the delivery of the project and ensure the company develops in line with the business case.

Areas of consideration comments

Section 151 Officer comments:

To note as per Section 4 of the report, that there will be financial implications for the Council in terms of financing the start-up of ESPIL to deliver the revised business case. Financing options for the Council to EPSIL will need to be considered in the best interest of the Council and the Council's Treasury advisors will be consulted.

Proposed financing options will be brought back to Cabinet later in the year, with the required governance reporting to the Audit & Governance Committee and the Shareholder Reference Group.

The initial approach to start small and to evaluate performance before looking to expand ESPIL's operation further, provides for simpler exit strategy operationally and financially if the revised business case concept is not delivering as expected.

Monitoring Officer comments:

ESPIL was incorporated on 26 November 2019. ESC is the owner/shareholder of ESPIL. The Shareholder Reference Group (SRG) (a committee of Cabinet) will perform the Council's role as shareholder/owner of its group of companies and exercise the Council's rights under the Articles of each company and under the Shareholder Agreement, except for any rights reserved to Cabinet or Full Council. The decisions of the Shareholder Reference Group are subject to 'call in' by the Overview and Scrutiny Committee. Members of ESC may attend meetings of the SRG and may ask questions with the permission of the person presiding. The Shareholder Representative will be the Chair of the SRG. They will act as a two-way channel of communication between the Directors of the company and the SRG. The day-to-day operation of ESPIL will be the responsibility of the Directors of the company.

Equality, Diversity and Inclusion/EQIA:

An EQIA will be produced as part of a future business case report.

Safeguarding:

Not applicable at this stage

Crime and Disorder:

Not applicable.

Corporate Services implications:

(i.e., Legal, Finance, Procurement, Human Resources, Digital, Customer Services, Asset Management)

The company will require support from several corporate services. Service Level Agreements will be put in place to enable this.

Residents and Businesses consultation/consideration:

Not applicable.

Appendices:

None

Background reference papers:

Date	Type	Available From
November 2022	ESPIL Business Case	CMIS



Committee	Cabinet
Date	09/04/2024
Subject	Acquisition of new Refuse Collection Vehicles
Cabinet Member	Councillor Rachel Smith-Lyte Cabinet Member with responsibility for The Environment
Report Author(s)	Rob Stammers LATCo Partnership Manager robert.stammers@east Suffolk.gov.uk
Head of Service	Kerry Blair Head of Operations Kerry.blair@east Suffolk.gov.uk
Director	Kate Blakemore Strategic Director Kate.blakemore@east Suffolk.gov.uk

Key Decision?	Yes
Is the report Open or Exempt?	OPEN

Purpose/Summary

As part of the transition from Norse to East Suffolk Services Ltd (ESSL) an operating agreement with Norse for several vehicles, to include 10 Refuse Collection Vehicles (RCV's) will expire on 31 December 2024, and as a result these vehicles will no longer be available for ESSL's use.

Therefore, an alternative arrangement needs to in place from the 1 January 2025 to ensure continuity of service. The Council has been working with ESSL to understand the best way to resource these vehicles from the 1 January 2025.

Whilst the smaller vehicles can be leased directly by ESSL, this report proposes that the 10 RCV's are purchased by the Council and leased to the company using the same mechanism to be put in place for the 23 RCV's that were purchased by the Council during 2023. This mechanism is currently being worked through and will be put in place during 2024/25.

Recommendation(s)

That Cabinet:

1. Approves the virement of £300,000 from the capital budget 24/25 Bath Tap Terrace allocation to the £2 million capital budget allocated to operational vehicles and equipment for 24/25.
2. Approves the expenditure of £2.3 million from the 24/25 capital programme for the purchase of 10 new RCV's from the operational vehicles and equipment budget.

Strategic plan

How does this proposal support Our Direction 2028?

Environmental Impact	All RCV's operated by ESSL use HVO fuel, alongside this the new vehicles will have the latest Euro VI engines, which are more fuel efficient.
Sustainable Housing	Not applicable.
Tackling Inequalities	Not applicable.
Thriving Economy	Not applicable.
Our Foundations / governance of the organisation	This proposal will be managed through existing procurement arrangements, and will include involvement by Procurement, Finance, Legal and Operations departments.

Justification for recommendations

1. Background

- 1.1. East Suffolk Services Ltd (ESSL) currently deploys 150 collection rounds per week across the district, picking up refuse, recycling, garden waste and trade waste. To enable this service, a fleet of around 50 Refuse Collection Vehicles (RCV's) are in operation.
- 1.2. An RCV collection vehicle is usually crewed by a driver and two loaders. To ensure a robust service, the general rule for fleet numbers is one spare vehicle for every five in service. This allows for the regulatory six-weekly service schedule to be carried out, along with allowing for breakdowns, MOT's etc.
- 1.3. In 2020 the Council approved a proposal to move to use HVO (Hydrotreated Vegetable Oil) fuel instead of diesel, thus reducing total carbon emissions by >40%. All of ESSL's heavy fleet now runs on HVO as a result, and the majority of their light fleet does as well. Vehicles that still use white diesel are due for replacement in the next year or so.
- 1.4. Whilst this paper focusses on the current fleet requirements for ESSL, it should be noted that there is ongoing work with ESSL to understand the implications of RAWs (Resources and Waste Strategy white paper), now superseded by Simplified Recycling, which will require additional RCV's for ESSL in the longer term.

2. Introduction

- 2.1. As part of the transition from Norse to East Suffolk Services Ltd (ESSL) an operating agreement with Norse for several vehicles, including 10 Refuse Collection Vehicles (RCV's) will expire on 31 December 2024, and as a result these vehicles will no longer be available for ESSL's use.
- 2.2. Therefore, an alternative arrangement needs to be in place from the 1 January 2025 to ensure continuity of service. The Council has been working with ESSL to understand the best way to resource these vehicles from the 1 January 2025.
- 2.3. Lead in timescales to purchase fleet are long, to ensure that we have new RCV's operationally available to ESSL from the 1 January 2025 an order needs to be placed by the end of April. The procurement process to enable the purchase of these vehicles is already underway, although no final order will be made until Cabinet considers this paper.

3. Proposal

- 3.1. To procure 10 RCV's to be in service by the end of 2024.
- 3.2. ESSL are currently developing a fleet strategy which will consider how they will manage and further green their fleet in the longer term. This should provide the Council with a better understanding of when and the type of fleet that will need to be purchased in subsequent years.

3.3. The specification for these RCV's is detailed in Appendix A of this report.

4. Financial Implications

4.1. The capital programme has £2 million allocated for operational vehicles in 24/25. The current cost of a new RCV is approximately £230,000 (excluding VAT). 10 new RCV's are required to replace the 10 currently leased with Norse.

4.2. The estimated maximum cost for purchasing 10 new RCV's totals £2.3 million.

4.3. Within the capital budget for 24/25 it has been identified that we will not require all the budget allocated to Bath Tap Chalets, Felixstowe for 24/25 as this project is only at the early stages of feasibility. It is therefore recommended that £300,000 is vired to the operational vehicles and equipment budget, increasing this budget to £2.3 million.

4.4. As both these budgets have been previously agreed there will be no impact on the projected Minimum Revenue Provision (MRP) for 24/25 outside that which has already been accounted for.

4.5. With the purchase of any fleet, there will also be ongoing revenue costs in terms of leasing these vehicles from the Council, fuelling and maintaining these vehicles. These costs will be borne by ESSL.

5. Legal Implications

4.6. East Suffolk Councils Constitution includes Contract Procedure Rules which are the Council's contract standing orders under section 135 of the Local Government Act 1972. They must be followed every time the Council enters into a contract for works, goods or services and set the minimum standards which must be adhered to.

4.7. The current Public Procurement Threshold for the supply of local authority service contracts is £214,904 including VAT and any procurement above this value must go through a procurement process as set out in the Public Contract Regulations 2015. Work is already in progress with the Council's procurement team to ensure that the purchase of these RCV's is fully compliant with the relevant legislation.

5. Risk Implications

5.1. If we don't purchase 10 RCV's before 31 December 2024 then the remaining fleet available to ESSL will not be sufficient to service the current waste and recycling collection service.

5.2. Current lead times for delivery of new RCV's is approximately 30 – 32 weeks, we also need to allow two weeks for delivery, pre-service checks and registration. To ensure these vehicles are available from the 1 January 2024 we need to place an order by Friday 26 April 2024.

6. Options

- 6.1. Whilst this report recommends the purchase of 10 RCV's there is also an option to hire these vehicles. It costs approximately £1,300 per week to hire an RCV, this would therefore equate to £67,600 per RCV per year. A total of 10 RCV's per year would cost £676,000.
- 6.2. Using an estimated life of 7 years for an RCV, hire cost for 10 RCV's would be substantially more compared to the purchasing costs. Also, at the end of the 7 years an owned vehicle will have a residual value. See the table below for further information.

	Purchase				Lease/hire		
	N° Vehicles	Cost per unit	Net Cost		N° Vehicles	Cost per unit/week	Total annual cost
Year 1	10	226,943	2,269,430		10	1,300	676,000
Year 2					10	1,300	676,000
Year 3					10	1,300	676,000
Year 4					10	1,300	676,000
Year 5					10	1,300	676,000
Year 6					10	1,300	676,000
Year 7					10	1,300	676,000
Total			2,269,430				4,732,000
					Purchase cost v. Hire cost		2,462,570
					Differential		48%

- 6.3. In conclusion, the preferred method of replacement would be to purchase, this provides better value for money, however this requires a comprehensive vehicle replacement programme to be worked up to ensure that peak levels of future replacement are avoided in the future. ESSL are working on such a strategy.

7. Recommendations

- 7.1 Approve the virement of £300,000 from the capital budget 24/25 Bath Tap Terrace allocation to the £2 million capital budget allocated to operational vehicles and equipment for 24/25.
- 7.2 Approve the expenditure of £2.3 million from the 24/25 capital programme for the purchase of 10 new RCV's from the operational vehicles and equipment budget.

8. Reasons for Recommendations

- 8.1 To ensure continuity of service and an efficient, adaptable and resilient waste & recycling collection service for East Suffolk.

Areas of consideration comments

Section 151 Officer comments:

The budget requirement for the recommendations is within the current General Fund capital programme as approved by Full Council in February 2024, and complies with the Financial Procedure Rules.

Monitoring Officer comments:

The acquisition of the 10 New Refuse Collection Vehicles is an executive decision for Cabinet. The recommendations in this report are pursuant to the Council's Finance Procedure Rules and Contract Procedure Rules.

Equality, Diversity and Inclusion/EQIA:

Not applicable.

Safeguarding:

Not applicable.

Crime and Disorder:

Not applicable.

Corporate Services implications:

(i.e., Legal, Finance, Procurement, Human Resources, Digital, Customer Services, Asset Management)

Procurement support is ongoing.

Residents and Businesses consultation/consideration:

Engagement with ESSL has taken place to ensure any new fleet purchased by the Council meets with their requirements.

Appendices:

Appendix A	RCV Specification
-------------------	-------------------

Background reference papers:

None.

RCV Specification			
Agenda Item 7			
RCV 26t 6x2 Rear Loading Compactor.			
ES/1920			
Vehicle Type	Description of Type	Rear loading refuse compactor. 26t GVW Chassis with low entry crew cab, 6x2 drive rear steer. Compactor body 19m ³ Volume and 10t+ load capacity. Two low-level automatic bin lifts to rear.	Price
Operation	Operating Environment	On-highway Urban	
	Utilisation (Kms pa)	15000 - 40000	
	Load type	Residual (landfill)/recycling/garden waste	
	Load Density	n/s	
	Unloading Facility	Refuse Transfer Station	
	Crew	Driver + 3	
Dimensions	Overall length - maximum	n/s	
	Overall width - maximum	n/s	
	Overall height - maximum	n/s	
	Turning Circle - maximum	n/s	
Cab and Chassis			
Cab	Type	RHD Low entry crew cab	£0.00
	Cab Doors	Full Height, front hinged, manual operation	
	Steering	Power assisted + Adjustable Steering Column	
	Glazing	Clear glass, Laminated front screen	
	Mirrors	Front, Kerb, Rear, fixed mount & wideangle, heated.	
	Air Conditioning	Air Conditioning	
	Cab door windows	Manual Operation	
	Rear View camera/display	Rear Camera with Cab Display screen	
	Drivers seat	Adjustable, Suspension Seat	
	Seat covers	Vinyl or Plastic easy clean - all seats	
	Seat Belts	3 Point inertia belts for driver and all passengers.	
	EC Tachograph	Digital 2 Man - Siemens VDO or stonebridge	
	Cab Beacons	Amber led Beacons mounted at front and rear.	
	Chassis	GVM - Maximum (Tonnes)	
Driveline configuration		6x2 rear steer	
Suspension - front		Steel - air assisted	
Suspension - rear		full air	
Power Unit	Fuel Type	ULS Diesel to BS EN590 able to take HVO biofuel	£0.00
	Maximum Power	225 Kw Minimum 200 Kw	
	Emissions Standard	Euro 6	
	Emissions Control	n/s	
	Exhaust routeing	Vertical behind cab	
	Exhaust Brake	n/s	
Transmission	Type	Automatic - Hydraulic	
	Ratios (Manual only)	n/a	
	PTO	Automatic	
	Retarder	Not Required	

Braking System	Type	Full Air Pressure	
	Antilock/Traction Control	ABS + ETC	
	Air Dryer	Chassis mounted	
	Air Tank Drain	n/s	
Brake Type	Parking Brake	n/s	
	Trailer Connections	n/a	
	Front Axle(s)	n/s	
	Rear Axle(s)	n/s	
Wheels	Type	Steel one-piece 10 stud	
Tyres	Type	Tubeless Radial with on-highway tread	
Fuel Tank	Location	Chassis Offside	
	Capacity (Minimum)	250 litres	
Electrical system	Voltage	24v	
Vehicle Mounted Equipment			
Loading Aperture	Location	Rear	
Body	Body - Volume - Total m ³	Nominal 19 Cu.M (= or - 1 Cu.M)	£0.00
	Taigate - Volume - Swept m ³	n/s	
	Load Capacity - Mass (t) Minimum	10.0 Tonnes	
	Maximum road speed.	90 Km/hr.	
	Gradeability maximum laden	15%	
	Power/Weight ratio (Kw/tonne)	7.7 Kw/tonne minimum	
Compactor	Operating System	Hydraulic Compaction - PTO	£0.00
	Cycling time (maximum)	n/s	
	Unloading	Rear Ejection	
	Body features	High tensile steel floor & sides	
		Access door with interlocks and access steps	
		High tensile steel floor & sides	
		Under floor sump	
Managed leachate run-off into hopper			
Safety Guards on all external mechanisms.			
Bin Lift	Location	Rear	£0.00
	No & .type.	Two- low-level split automatic BS EN804.1	
	Bin Lift Capacity (SWL) -	n/s	
	Bin Capacity-	120, 180, 240, 360, 660 & 1100 litre	
	Operation	Two man operation	
	Cycling time (maximum)	n/s	
	Power source	PTO Hydraulic	
	Safety Stop circuit	EN418:1992 & EN954-1:1997	
Paint & Graphics	Cab Colour	White	
	Chassis Colour	Black	
	Body Colour	White	
	Livery	User supplied decals	
Other Equipment	Additional Equipment	On-board vehicle weighing.	

		Side mounted handwash with hot water	
		Emergency stop controls and safety rails	
		LED Amber flashing beacons fitted to side and rear	
General			
	Type Approval	Suppliers are responsible for providing the appropriate GVNTA or ECWVTA applicable on the date of supply to enable registration as a new vehicle within the United Kingdom	
	Compliance	All vehicles and fitted equipment must be fully compliant with all statutory regulations in force and applicable to the construction and use of the supplied vehicle on the date of supply.	
	Specification	Vehicles are to be supplied to the specification defined above. Where no specified requirement is stated (n/s) then the manufacturers standard specification appropriate to the required performance and compatible with the defined elements of the specification is required.	
	Warranty		
	Training	Body Training (Operator Instruction + Technical Training) Bin Lift Training (Operator Instruction)	
	Vehicle Pricing	A total price is required for the complete vehicle to the specification provided, including any delivery charges but exclusive of any vehicle excise duty or VAT.	£0.00
Options	Equipment or Alternative Specifications that may be required in addition to or as an alternative to the basic specification defined above. To be individually priced.		
		<u>ISS ID CLEAR</u>	
		<u>IDCLEAR ANTI-THEFT+ROLL AWAY SYSTEM</u>	
		<u>ISS I RXLite Camera System 4 Camera Live DVR System (including 5 Years Data) 7" In-Cab Monitor, 30 Minute Timer Relay + GPS Module</u>	
		<u>ISS Camera Memory (1TB)</u>	
		<u>ISS-I-CYCFS-Cycleclear Full System Full Cycleclear System LED Display, Left Turn Warning + Intelligent Detection</u>	
		<u>ISS-I-FFLB- ISS LED "Caution Workers" Sign (Front)</u>	
		<u>Caution Workers Light Board Front (pair)</u>	
		<u>ISS-P-SR Radar System ISS Programmable Pulse Radar Detection System</u>	
		<u>Fleetclear Connect Tracking system</u>	
		Bartec TabActive	
	Option Pricing	A separate price is also required for the supply and/or fitting each item listed as an Option within the above specification, payable in addition to the complete vehicle price only where that item is requested to be supplied. The Option price should exclude VAT.	£0.00

Committee	Cabinet
Date	09/04/2024
Subject	Housing Regulation – Quarterly Update
Cabinet Member	Councillor David Beavan – Deputy Leader and Cabinet Member for Housing
Report Author(s)	<p>Heather Fisk Head of Housing Heather.fisk@eastsoffolk.gov.uk</p> <p>Lynne Thomas-Mead Strategic Lead – Housing Information and Governance Lynne.thomas-mead@eastsoffolk.gov.uk</p> <p>Stephanie Duff Strategic Lead – Property Services Stephanie.duff@eastsoffolk.gov.uk</p>
Head of Service	<p>Heather Fisk Head of Housing Heather.fisk@eastsoffolk.gov.uk</p>
Director	<p>Andrew Jarvis Strategic Director Andrew.jarvis@eastsoffolk.gov.uk</p>

Key Decision?	No
Is the report Open or Exempt?	OPEN

Category of Exempt Information and reason why it is NOT in the public interest to disclose the exempt information.	Not applicable
---	----------------

Purpose/Summary

To provide an update to Members on housing regulation matters, which led in May 2022 to a Regulatory Notice being published by the Regulator of Social Housing (RSH) for a breach of the Home and Rent Standards.

These quarterly updates are required, as set out in paper [ES/1432](#), which was presented to Full Council on 25th January 2023. At the meeting recommendation 6 stated “Members note that quarterly updates will be presented to Cabinet, detailing the progress against the Compliance and Rent Improvement Plans”.

This report follows [ES/1796](#) the previous quarterly update to Cabinet on 2nd January 2024. Section 2 of this report has been re-written to describe progress and status.

This report is provided for information purposes only. There is no requirement for Cabinet to make a decision.

Recommendation(s)

That Cabinet:

1. Notes the information contained within this report and endorses the actions set out to ensure the Council is compliant with the Regulator of Social Housing Consumer ‘Home Standard’
2. Notes the information contained within this report and endorses the actions set out to ensure the Council is compliant with the Regulator of Social Housing ‘Rent Standard’
3. Notes that the next quarterly update will be presented to July 2024’s Cabinet Meeting.

Strategic plan

How does this proposal support Our Direction 2028?

Environmental Impact	This work will not affect the environmental impact of ESC social homes
Sustainable Housing	<p>This work will ensure that ESC is taking all reasonable and expected measures to ensure tenants living in social homes owned by East Suffolk Council are safe.</p> <p>Improvements are being made to build capability and capacity for operational management of building and tenant safety. Key changes include:</p> <ul style="list-style-type: none">• A new compliance team in Housing ‘Property Services’• Improvements to housing data and information systems to underpin the programmes of cyclical inspections and servicing, and planned safety works and capital projects. <p>An asset review of the high-rise building ‘St Peter’s Court’ has concluded, and Cabinet has determined the building has reached the end of its viable life. Affected Tenants are being supported to move to alternative, sustainable social homes and the building is being emptied.</p>

<p>Tackling Inequalities</p>	<p>This work will ensure that tenants living in social homes owned by East Suffolk Council are paying the correct rent and service charges, in accordance with the ESC Rent and Service Charges Policy.</p> <p>Tenants who were incorrectly converted from social rent to more expensive affordable rent have been converted back to social rent and are being refunded the rent they have overpaid.</p> <p>Tenants who were incorrectly charged for maintenance of their heating system, via a service charge or de-pooled rental charge, are being refunded the service charge in full.</p>
<p>Thriving Economy</p>	<p>An asset review of the high-rise building ‘St Peter’s Court’ has concluded, and Cabinet has determined the building has reached the end of its viable life.</p> <p>The building is being decanted and tenants rehoused, and the site will become available for re-generation by East Suffolk Council.</p>
<p>Our Foundations / governance of the organisation</p>	<p>Arising from this work, a new Housing Health and Safety Board has oversight of all policies and activities that are necessary to ensure the safety of tenants living in social homes owned by East Suffolk Council</p> <p>A new Rent and Service Charges Policy has been written. A new Rent Development Board has oversight of rent setting and service charges.</p>

Justification for recommendations

1. Background

- 1.1. East Suffolk Council (ESC) owns and is the social landlord for approximately 4,500 properties, which are managed through the Housing Revenue Account (HRA). The stock consists of a mixture of bungalows, flats and houses, and includes 13 Retired Living Schemes, one block over 18m tall and a number of properties used as Temporary Accommodation for homelessness under s188 and s193(2) of the Housing Act 1996. There are also some commercial units and some units, which are leased to other providers.
- 1.2. 'Registered Providers' of social housing include both Councils and Housing Associations. They are governed by the Regulator of Social Housing (RSH) and the Housing and Regeneration Act 2008, sets out the role of the RSH.
- 1.3. The RSH has a set of standards, which Registered Provider (RP) landlords, must comply with. These include **4 consumer** standards and **3 economic** standards.
 - 1.3.1. The consumer standards are applicable to all RP's, including Councils.
 - 1.3.2. Local authority registered providers were not subject to any of the economic standards set by the RSH until they became subject to the Rent Standard with effect from 1st April 202.
- 1.4. The RSH Consumer Standards include the **Home Standard**, which focusses on quality of accommodation and repairs and maintenance. This includes compliance with the 'Big 6' areas: Fire, Gas Safety, Electrical Safety, Water Safety (Legionella), Asbestos and Lifting Equipment (Lifts and Stairlifts). The key outcomes of the Home Standard are:
 - Ensure council homes meet the Decent Home Standard and are maintained to this standard,
 - Provide a cost-effective repairs and maintenance service to homes and communal areas that responds to the needs of, and offers choice to tenants, and has the objective of completing repairs and improvements right first time,
 - Meet all applicable statutory requirements that provide for the health and safety of occupants in their homes.
- 1.5. The RSH Economic **Rent Standard** applies to 'low-cost rental accommodation', as defined by section 69 of the Housing and Regeneration Act 2008, with some limited exceptions (not relevant to this paper). Registered providers must comply in full, with all the requirements and expectations set out in the Rent Standard. They must additionally comply with all the requirements and expectations of the Rent Policy Statement on the setting, increase and decrease of rents and service charges.
- 1.6. The RSH has a 'co-regulatory' approach to supporting the regulation of social housing. There is an expectation that RPs are open and transparent and will make a self-referral to the RSH if there is reason to believe that there may be a breach of one or more of the Regulatory Standards.

2. Introduction

- 2.1. During late 2021 and early 2022 the Council undertook a high-level review of the Council's landlord service. This identified some areas which may have breached the Regulatory Standards, and in February and March 2022 ESC engaged with the RSH, outlining potential breaches of the Homes Standard and Consumer Standard.
- 2.2. On 25th May 2022, the RSH published a [Regulatory Notice](#) confirming these breaches.

- 2.3. Since then a substantial programme of correction and improvement has been undertaken, as set out in detail in the Report [ES/1432](#), which was presented to Council in January 2023
- 2.4. This report provides a quarterly update on the progress of this work programme.

3. Progress Update

3.1. At 29th February 2024 the compliance levels were:

Aspect of Compliance	Level of Compliance
Asbestos Safety- communal areas	100%
Electrical Safety-domestic	99.1%
Electrical Safety- communal	100%
Fire Risk Assessments in date	100%
Gas Safety	99.98%
Passenger Lift Safety	100%
Water Safety	100%

This data is reviewed monthly by the Housing Health and Safety Board

3.2. **Asbestos Safety**

- 3.3. The procurement of a new asbestos removal contractor has been completed and they have successfully mobilised the contract. The new contractual arrangements include key performance indicators which the Contract Manager will monitor to ensure service standards are met.
- 3.4. Trade Supervisors and Repairs Inspectors have all received enhanced Asbestos Duty to Manage training. This course set out the legal duties as Landlord ESC has to its residents, contractors and staff.
- 3.5. A programme has been developed to re-inspect all homes over a 5 year period. The annual programme of c900 homes is targeting market towns first with 286 completed in Beccles in the first 4 months of the new programme.
- 3.6. Work has commenced to procure a new asbestos surveying contract to replace the current arrangements which come to an end on 31st August 2024.
- 3.7. The Contracts Manager Asbestos and Water Safety has been awarded the British Hygiene Certificate in Management of Asbestos in Buildings, following recent training

3.8. **Electrical Safety**

- 3.9. A Contracts Manager for Electrical Safety has been successfully appointed following a recruitment campaign. This role will co-ordinate all aspects of electrical safety across the HRA portfolio.
- 3.10. Periodic Inspections continue with 4,318 occupied properties having an electrical inspection in the last 5 years.
- 3.11. 37 dwellings have an electrical inspection over 5 years but less than 10 years old. Just 5 dwellings have an inspection over 10 years old. Each of these have had multiple visits and requests to gain access. There are limited legal routes to force access as electrical testing does not have the same legal standing as gas servicing access. Tenancy Services staff are following up with tenants to determine the root cause of denying access and agree specific access arrangements.
- 3.12. A review of 138 homes with the oldest electric storage heaters has commenced. Plans are being developed to upgrade with more efficient heating systems. Air source heat pumps will be installed where suitable.
- 3.13. Annual servicing and inspection of the lightening protection systems to St Peters Court, Plaisir Place and Spruce Court has been successfully completed.

3.14. **Fire Safety**

- 3.15. All 86 fire risk assessments (FRA) to blocks of flats are in date in accordance with the Regulatory Reform (Fire Safety) Order 2005.
- 3.16. A positive outcome from the fire compartmentation and fire door upgrade works has resulted in the recent FRA at Amy Court reducing the risk categorisation from substantial to moderate. There are no blocks which are rated with the 2 highest risk levels, the current portfolio wide risk level is:

Risk level	Number of blocks
Intolerable	0
Substantial	0
Moderate	46
Tolerable	40
Trivial	0

- 3.17. FRA remedial actions have reduced since the last update report. There remain 362 open actions (down from 408) of which 336 are overdue, details are set out below:
- 3.18. 160 (44%) of actions related to fire doors
- 3.19. 76 (21%) relate to compartmentation surveys or fire stopping
- 3.20. 19 fire detection systems require upgrading or replacement.
- 3.21. Premarket engagement was undertaken in December with regional contractors who specialise in fire safety works to address the compartmentation and fire doors actions. Preparation of tender documents has begun with procurement expected to begin in the next quarter.
- 3.22. Design work for fire detection and emergency lighting system upgrades has been completed for the next 9 blocks focusing on retired living schemes. Building Regulation Applications have been submitted for the works and is now in consultation stage. Procurement will begin upon receipt of Building Regulation Approval.
- 3.23. Works at Harry Chamberlain Court to upgrade both the fire detection system to the whole buildings and warden call system to the retired living accommodation is nearing completion.
- 3.24. Two buildings remain with active enforcement notices from Suffolk Fire and Rescue Service, Harry Chamberlain Court notice expires 9th May 2024 where work is nearing completion ahead of the expiry date. St Peters Court notice expires 4th September 2024. Work continues to decant the 90 flats from St Peters, with a target completion date of end August. Progress to date is shown below:

Vacant flats	53
Tenanted flats	37
Tenants with an accepted offer	13 of the 37 above
Tenants with an active application to move but with no accepted offer	24 of the 37 above

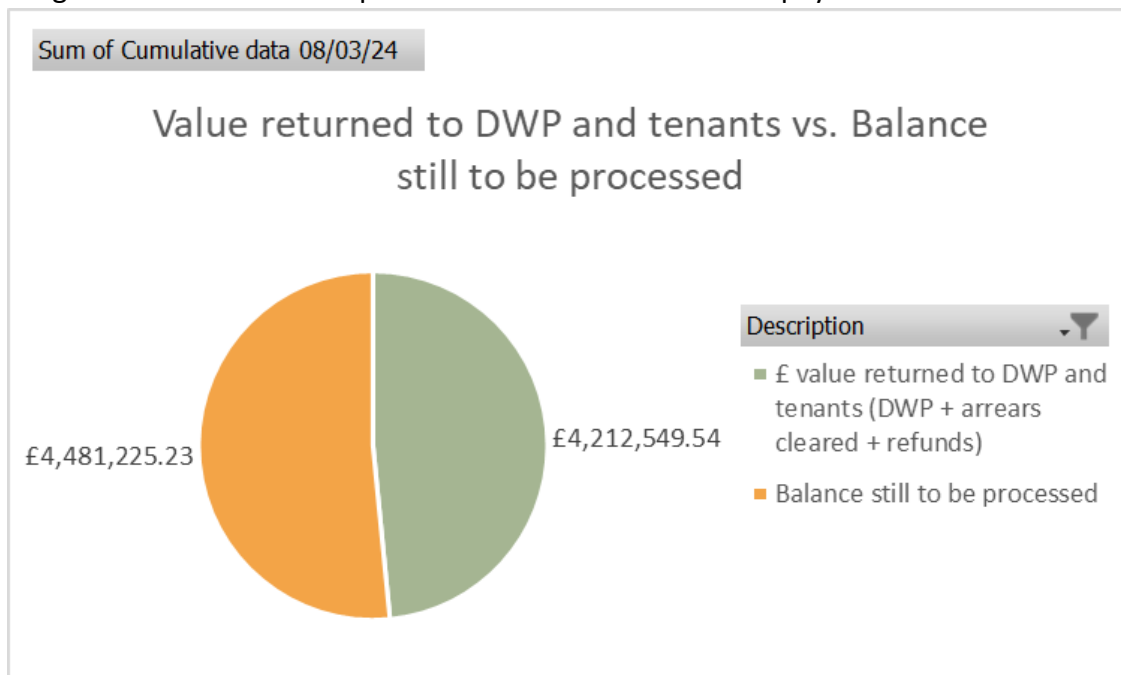
For the 24 tenants with no accepted offer we have tentative plans for 9 of these. During the next quarter Officers will monitor progress very closely and develop plans to ensure the building is vacated by end August. These plans will be reviewed and agreed with the St Peter's Court Project Board.

- 3.25. To reduce the risk of fire as a result of anti-social behaviour (ASB) overnight mobile guarding has been introduced to St Peters Court, early indications are this is having a positive impact on reducing ASB.
- 3.26. **Gas Safety**
- 3.27. Domestic gas safety compliance remains high with just 1 expired Landlord Gas Safety Record (LGSR) due to no access. There are 3604 occupied dwellings with in-date LGSRs, 33 dwelling's gas supply are 'capped' at the tenant's request.

- 3.28. The new heating services contract was successfully mobilised on 8th January 2024. The new contract has enhanced performance measurement and third-party contract management support is provided by Eastern Procurement whose heating framework has been used to appoint Gasway Services Limited. The contract has been let for 3½ years with two timed break clauses.
- 3.29. Work is continuing with Housing Management and Financial Inclusion Teams to support the 33 tenants who have their gas supply ‘capped’. Support includes budgeting advice, utility provider tariff review and alternative heating sources.
- 3.30. **Lift Safety**
- 3.31. The 12 passenger carrying lifts maintained in HRA buildings remain compliant with the Lifting Operations and Lifting Equipment Regulations 1998 (LOLER) All lifts have 6 monthly inspection and servicing.
- 3.32. Water Risk Assessments are required for blocks which have communal water supplies. Currently ESC has 15 blocks which require assessment, all of which are in date. Additionally, there is a regular programme of flushing and temperature testing.
- 3.33. Legionella Awareness Training was delivered in February to relevant staff across the Housing Service.
- 3.34. To ensure members of the in-house trade team are compliant with current requirements Water By-Law training was delivered to the plumbing trade team.
- 3.35. **Rent Standard**
- 3.36. The total value of affordable rent and heating charges overpaid by Tenants during the period 2010 to 2023 was **£8,693,774**.
- 3.36.1. The Affordable Rent overpaid by Tenants was £4,181,963
- 3.36.2. The value of the incorrect heating charge overpaid by tenants was £4,511,810.
- 3.37. Tenants in receipt of Housing Benefit who have overpaid affordable rent and/or the heating service charge have been paid too much housing benefit. The figures in 3.8 include the Housing Benefit overpayment.
- 3.38. This HB overpayment was ‘clawed back’ from the HRA in January, and the full value of Housing Benefit repaid to the DWP is **£3,517,435.19**.
- 3.39. There are 830 HB records (associated with 743 tenancies) that failed the correction process and are being manually processed. 791 records have been corrected to date, and 39 are ongoing due to complications with current HB claims. Resolution of these 830 records errors will cause a very small adjustment to the total HB clawback figure.
- 3.40. It was agreed at Full Council in January 2023 that tenant arrears will be paid before any refunds arising from historical errors are paid out to tenants.
- 3.41. The value of tenant arrears owed to the Council on 12.11.23 was £1,554,343. Accordingly, we expect the HRA to receive receipts with a value in the region of £1,554,34 over the next few months as tenant arrears are cleared down. The arrears to be repaid will be the actual arrears at the time the rent account is credited with the over-payment. We are monitoring the actual value of arrears that are being repaid during this project (see 3.15).
- 3.42. Tenants are required to pay their rent one week in advance (low-cost rental accommodation) and this is a condition of their tenancy agreement. Over time, many tenants revert to paying in arrears. The refunds financial process will retain funds on the rent account so all affected tenants are ‘moved’ to a financial position of one week rent in advance.
- 3.43. The tables below summarise the financial outcomes arising from the historical errors in affordable rent charges and heating service charges, and progress to correct the errors:

<u>Over-payments</u>		£
Rent overpaid		£4,181,963.79
Charges for heating system maintenance overpaid		£4,511,810.98
Total overpayments made by tenants		£8,693,774.77
Housing Benefit clawback		£3,517,435.19
<u>HRA receipts</u>		
Recover current tenant arrears (estimate on 12.11.23)		£812,889.60
Recover former tenant arrears (estimate on 12.11.23)		£632,453.68
Recover debt written-off		£109,000.00
	HRA receipts	£1,554,343.28
<u>Credit Balance to be returned to tenants</u>		£
Total overpayments made by Tenants		8,693,774.77
Deduct Housing Benefit (HB) clawback		£3,517,435.19
Deduct HRA Receipts		£1,554,343.28
Credit Balance due to Tenants		£3,621,996.30

3.44. Progress with the financial processes to correct tenant overpayments is as follows:



	£	Progress % 08.03.2024
HB clawback re-paid to DWP (10.01.24)	£3,517,435.19	99%
HRA Receipts (arrears and debt write-off)	£180,553.24	11.6%
Refunds paid to tenants	£514,561.11	14.2%

3.45. An extensive piece of work had been undertaken to assure data quality and design data tools and business processes to ensure the refunds can be administered correctly and as quick as practicably possible.

- 3.46. The full business process is multi-stage and includes batch uploads of financial data, case management by a Rent Officer, bank account validation and the ESC financial refund transaction.
- 3.46.1. Case management is a comprehensive process that considers arrears, debt written-off, court action, bankruptcy orders, paying rent in advance, sole and joint tenants, and deceased tenants.
 - 3.46.2. Further complexity arises because many tenants have held multiple tenancies with East Suffolk, often with different 'joint' partners. This creates a complex web of inter-linked tenancies that must be managed carefully.
 - 3.46.3. ESC has recruited 3 additional full time Rents Officers, on a fixed term basis to support the increased workload of refunding monies to Tenants.
- 3.47. Based on time estimates for each stage in the multi-stage business process, this programme has been planned to process 300 tenancies a week. Experience over the last 12 weeks has shown this is an ambitious target.
- 3.47.1. Some of this is accounted for by high levels of annual leave and staff sickness during the period. It has also taken time for officers to be trained and to fully understand the complexities of case management.
 - 3.47.2. We have made responsive changes to the data tools we built, as a result of lessons learned during full deployment in the real environment.
 - 3.47.3. The full business process is multi-stage and officers in housing, finance and IT have had to refine their approach to rostering staff to make sure all stages of the project are being progressed in parallel to achieve maximum productivity.
 - 3.47.4. By its nature the work is detailed, intense and requires accuracy at all time.
 - 3.47.5. Surprisingly, tenants are not applying for a refund (and providing the required bank information) as soon as they receive their individual letter and this is slowing down the pace of the overall process.
 - 3.47.6. We are having a lot of contact with tenants during the refund process, which impacts Officer capacity. Typical issues include that the tenant has lost their letter (so a new one has to be printed manually and sent) and queries about which bank account they can use for the refund.
- 3.48. Officers continue to closely monitor progress and we believe there is still opportunity to accelerate the pace of work. Nevertheless, we are considering the case for adding additional administration resource to the team.
- 3.49. We advise that revised targets would see all Current tenants being processed by end July 2024 and the bulk of Former tenants by September/October 2024.
- 3.49.1. There is likely to be a 'tail' of former tenants that we have lost contact with, and separate financial arrangements will be made for holding monies in reserve for a period of several years.
- 3.50. Two current tenants have advised us of serious or potentially terminal ill health and these tenants have received their refunds early. One tenant was accelerated when we learned they had limited cooking facilities for hot food and the refund was used to replace an oven.
- 3.51. All current tenants in St Peter's Courts have been advanced and have received their refunds. This will facilitate the current work to decant the building.
- 3.52. A Rent Officer is visiting all tenants owed a refund of greater than £5k after case management has been completed. The Officer is delivering their individual letter by hand.

3.52.1. So far 41 tenants have been visited (to 15.03.24). A further 4 Tenants are scheduled a visit but are not responding to our contacts.

3.53. Removal of the Regulatory Notice

3.54. We anticipate the Regulatory Notice could be removed in early Autumn 2024 (October).

3.55. The critical path is driven by the requirement for an independent 3rd-party audit of compliance capability in Housing. A Scoping document for the audit has been prepared for discussion and agreement with the RSH in April, and then procurement for the auditor will start with a target date for audit completion of September/October 2024.

3.56. The arguments for the removal of the notice are as follows:

Rent Standard:

3.57. ESC has been compliant with the Rent Standard since April 2023.

3.58. All rents and service charges were corrected on 4th April 2023 and Tenants have been paying correct charges since.

3.59. An independent audit of ESC rent accounts was completed by David Tolson Partnership on 11th September 2023 and has guided corrections to historic errors.

3.60. The Housing Benefit overpayment was repaid by the HRA to the DWP in January 2024.

3.61. Work is in progress for case management of each rent account and to refund money to tenants (after deductions for arrears). Expected completion is end September 2024.

Home Standard:

3.62. ESC is compliant for all aspects of servicing and inspections (see Section 3.1).

3.63. We anticipate the 2 remaining Enforcement Notices from Suffolk Fire and Rescue Services (SFRS) will be removed, in the case of Harry Chamberlain Court by 9th May 2024 and St Peter's Court by September 2024.

3.64. ESC has made very good progress decanting tenants from St Peter's Court and we anticipate this will be completed by end August 2024 (subject to timescales for Court proceedings to regain possession if this action proves necessary).

3.65. A satisfactory outcome following an independent 3rd-party audit of compliance capability in Housing (estimated completion is October 2024).

4. Financial Implications

4.1. Detail of the Financial implications of these historical errors are set out in paper [ES/1432](#), which was presented to Full Council on 25th January 2023.

4.2. In addition to the initial refunds of £8,693,774, there will also be an effect on the HRA Business Plan, due to a reduction in income. Income has been reduced in each future financial year as part of our business plan modelling and including the initial refund levels, the impact on the HRA Business Plan over the rest of its 30-year term is over £28.2M

5. Legal Implications

5.1. Detail of the Legal implications of these historical errors are set out in paper [ES/1432](#), which was presented to Full Council on 25th January 2023

6. Risk Implications

6.1. This area of work has been added to the Corporate Risk Register and the current Risk Score is **C2 (Amber)**

7. Options

7.1. Not applicable

8. Recommendations

8.1. This progress report is provided for information, there is no requirement for Cabinet to make a decision.

9. Reasons for Recommendations

9.1. Not applicable

10. Conclusions/Next Steps

10.1. The next quarterly update will be presented to July 2024's Cabinet Meeting

Areas of consideration comments

Section 151 Officer comments:

No comment required, report for information only.

Monitoring Officer comments:

No comment required, report for information only.

Equality, Diversity and Inclusion/EQIA:

An EQIA was completed to accompany the report to Full Council in January 2023, where certain policy decisions were made. The reference for this EQIA was 'EQIA477820335'. As this report is an update on progress made and no decisions are required, a further EQIA is not required.

Safeguarding:

No comment required, report for information only.

Crime and Disorder:

No comment required, report for information only.

Corporate Services implications:

(i.e., Legal, Finance, Procurement, Human Resources, Digital, Customer Services, Asset Management)

Human Resources

Housing will be further building on its capability requirements during 2024 to meet the standards set out under the Social Housing Regulation Act. Additional roles were accounted for as part of the budget setting process and it is likely recruitment will commence in the next quarter.

Digital

As part of this programme of work, ESC has identified that significant work is required to improve the quality of data held electronically in relation to the effective management of the housing stock. Therefore, system updates are being planned and implemented as required.

This includes implementation of a new module for our Asset Management system to manage the cyclical servicing of essential components and equipment in properties e.g., heating systems, alarm systems. Roll out of this system began on 18th March 2024 and implementation will be completed in April 2024.

Residents and Businesses consultation/consideration:

No comment required, report for information only.

Appendices:

None

Background reference papers:

Date	Type	Available From
25.01.2023	ES/1432 Housing Regulation	ESC CMIS
02.01.2024	ES/1796 Housing Regulation Quarterly Update	ESC CMIS
25.05.2022	Regulator of Social Housing: Regulatory Notice	RSH website
March 2023	ESC Policy on Rent and Service Charges	ESC public website