



Committee Report

Planning Committee - 19 December 2019

Application no DC/19/1831/FUL

Location

St Johns Hall
Halesworth Road
Ilketshall St John
Beccles
Suffolk
NR34 8JQ

Expiry date 8 August 2019

Application type Full Application

Applicant Mr Tim Basey-Fisher

Parish Ilketshall St John

Proposal Erection of new steel frame building to act as a new pallet storage unit for the storage element of existing storage and farm business.

Case Officer Joe Blackmore
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1. Summary

- 1.1. St John's Hall Storage is a farm diversification enterprise located in the countryside within the rural parish of Ilketshall St John. The application seeks full planning permission for a new storage building in order to expand the storage enterprise to meet local demand.
- 1.2. A planning application for a new storage building was submitted to the Council in 2017 (ref. DC/17/0410/FUL). Planning permission for the development was refused and the subsequent appeal to the Planning Inspectorate dismissed. Of note in that appeal decision was that the Planning Inspector determined the proposal was not unacceptable, in principle, and that there was a strong economic case for the development; however, it was judged that the visual impact of the proposal would be unacceptable and outweighed the benefits.

- 1.3. The current application seeks to overcome the dismissed appeal. The building has been reduced in size and re-positioned to better relate to the existing complex of commercial and agricultural buildings. The application is also supported by a comprehensive mitigation landscaping strategy that will, once established, effectively screen the building offering some landscape character benefits through well-designed planting proposals. The landscape and visual impact assessment provided demonstrates that the impact of the development in the long term would be acceptable in accordance with Local Plan policy WLP8.35 (Landscape Character).
- 1.4. Since the appeal was determined the Local Plan has been adopted (March 2019) and the spatial strategy for employment growth in the plan does not support the principle of the proposed building, as the site is not within: a settlement boundary; an allocated employment site; or a policy-defined existing employment area. Because of that conflict with the Local Plan, the application has been brought direct to committee for determination to enable the main issues and policies to be fully considered by the planning committee.
- 1.5. Notwithstanding the policy conflict, officers consider that this is a unique proposal and development site where the benefits to the rural economy would be substantial and in accordance with the objectives of the National Planning Policy Framework and the Council's Business Plan and East Suffolk Growth Plan. Those economic benefits go beyond job creation as St John's Hall Storage plays an important role in meeting the operational requirements of a number of businesses within the district; the proposed expansion of the site would enable that to continue, supporting further growth in the area. It is considered that the proposal cannot realistically be delivered on a separate, allocated site or existing employment area in accordance with the Local Plan.
- 1.6. Officers consider that this is a finely balanced decision but that there are material considerations, most notably the economic benefits arising from the development proposal, that would outweigh any harm arising including the identified conflict with the Local Plan. Officers are seeking authority to approve the application.

2. Site description

- 2.1. The application site is located in the countryside within the rural parish of Ilketshall St John approximately 1.5 miles from the settlement boundary of Bungay, to the northwest. The site lies to the eastern side of the A144 which connects Bungay to the A12 trunk road at Darsham. St Johns Hall farmstead currently comprises a historic farmhouse (St Johns Hall), large storage units and surrounding arable farmland. St John's Hall Farm began operating in the 1950s and has since diversified to provide domestic and commercial storage at St John's Hall Storage. The farming and storage businesses are interconnected with St John's Hall being the operational centre for both.
- 2.2. The application site is rectangular in shape and covers some 0.55 hectares of greenfield, former farmland located immediately to the east and north of the farmstead and storage centre complex at St John's Hall. There is a slight fall across the site from south to north from approximately 30m to 25m AOD.

- 2.3. The existing farmhouse at St John's Hall lies to the south side of the complex and is a grade II listed building. Some 250 metres north-west of the complex is the Church of St. John the Baptist, listed grade II*. A greater distance southeast of the site is the Church of St Lawrence, listed grade II*; farther to the east is St Andrew's Church, listed grade I.
- 2.4. The site does not fall within a designated conservation area or area of outstanding natural beauty. In terms of flood risk, the site is in flood zone 1 which is the lowest risk area.

Planning History

- 2.5. Due to the gradual diversification at the farmstead and expansion of the storage business over the last 30 years, there is a detailed planning history for the site. That history is listed below and, where applicable, key decisions are discussed in greater detail within the planning considerations section of this report.

W4444/1 - permitted 02 May 1985.
'General purpose farm buildings (2232sq m)'.

W4444/2 - permitted 02 July 1985.
'New Access onto A1444'.

W/444/3 - permitted 14 Feb 1995.
'Change of use for commercial storage'.

W4444/4 - permitted 07 March 1997.
'2 Grain stores' - Full Planning permission.

W4444/4 - permitted 20 May 1999.
Amendments to above approved by decision notice of same reference 'Substitution of 2 portal framed grain stores totalling 16000 square feet with one single portal framed general purpose store totalling 14000 square feet'.

W4444/4 - permitted 20 Sept 1999.
Amendments to above approved by decision notice of the same reference 'Increase in length of portal framed building from 48 metres to 54.85 metres.'

W4444/5 - permitted 07 April 2004.
'Side extension to existing storage building'.

DC/07/1696/FUL - refused. 13th November 2007 - Appeal dismissed.
'Construction of an agricultural workshop with associated store and office facilities'

DC/12/0136/FUL - permitted 30 March 2012
'Installation of solar panels on shed roof'.

DC/12/0872/FUL - permitted 06 Dec 2012.
Construction of an agricultural grain store and agricultural chemical store.

DC/13/0083/FUL - permitted 20 March 2013.

Revisions to previously approved scheme - DC/12/0872/FUL - Increase size of agricultural grain store with drying floor.

DC/14/1080/FUL - permitted 30 June 2014.

'Construction of a building to house two biomass boilers with associated equipment and storage Area'.

DC/17/0410/FUL - Refused. Appeal Ref APP/T3535/W/17/3188362 dismissed on 6th April 2018; "(The 2018 Appeal Decision)".

'Erection of new steel frame building to act as new pallet storage unit for existing storage business'

A copy of the appeal decision can be found at appendix B.

3. Proposal

- 3.1. This application seeks full planning permission for a new steel framed warehouse building on land at St John's Hall. The new building would measure 61.73m by 52.77m. It would have an eaves height of 9.15m and an apex height of 12.68m. Its floor area would be 3257sqm. The building would be clad with profiled metal to match existing buildings surrounding the site.
- 3.2. In terms of its use, the building would be a new pallet storage unit for the existing storage business. This is a B8 - Storage and Distribution Centre - use under the Town and Country Planning (Use Classes) Order 1987, as amended.
- 3.3. The development proposal includes a site landscaping strategy and a surface water drainage strategy inclusive of an attenuation basin. The development proposal also includes an area of hardstanding to the north and west of the building. This provides for HGV access to the building and for loading/unloading.

4. Consultations/comments

- 4.1. 30 local residents have objected to the application raising the following matters:
 - The proposal is contrary to the Local Plan.
 - The application is not materially different from the scheme refused and dismissed at appeal.
 - Other sites in the area are designated in the Local Plan for this kind of development.
 - The applicant owns other development sites in the vicinity that could be utilised.
 - The expansion will bring about more traffic including HGV's.
 - The level of growth at St John's Hall is not compatible with its rural location.
 - Approval contrary to the Local Plan will set an undesirable precedent.
 - Road network is not suitable for increase in traffic, particularly HGV's.
 - The building will be an eyesore and harm the character of the countryside.
 - The site has grown consistently; when will it stop?
 - The proposal will cause noise and light pollution.
 - The site will appear more industrial than agricultural.

- Loss of views from nearby residential properties.
- Mitigation planting will take too long to establish and will only partly mitigate the visual impact.

Consultees

Parish/Town Council

Consultee	Date consulted	Date reply received
Parish Council	13 May 2019	14 June 2019
Summary of comments: OBJECT to the application because it is contrary to the Local Plan and would cause demonstrable harm to interests of acknowledged importance. Please see appendix A for a full copy of the Parish Council response.		

Statutory consultees

Consultee	Date consulted	Date reply received
SCC Flooding Authority	16 May 2019	22 May 2019
Summary of comments: Holding objection due to insufficient information.		

Consultee	Date consulted	Date reply received
Suffolk County - Highways Department	21 June 2019	13 June 2019
Summary of comments: No objections; conditions recommended.		

Consultee	Date consulted	Date reply received
Historic England	21 June 2019	24 June 2019
Summary of comments: No comments on the application.		

Non statutory consultees

Consultee	Date consulted	Date reply received
WDC Environmental Health - General	17 May 2019	12 June 2019
Summary of comments: No objections.		

Consultee	Date consulted	Date reply received
SCC Lighting Engineer	30 May 2019	4 June 2019
Summary of comments: Further information on external lighting required.		

Consultee	Date consulted	Date reply received
Economic Regeneration (Internal)	19 July 2019	9 August 2019
Summary of comments: Support the application; full comments viewable on public access page.		

Re-consultation consultees

Consultee	Date consulted	Date reply received
SCC Flooding Authority	2 September 2019	19 September 2019
Summary of comments: No objections; conditions recommended.		

5. Publicity

The application has been the subject of the following press advertisement:

Category	Published	Expiry	Publication
Departure	06 December 2019	31 December 2019	Lowestoft Journal
Major Application; Affects Setting of Listed Buildings	28 June 2019	19 July 2019	Lowestoft Journal
Category	Published	Expiry	Publication
Departure	06 December 2019	31 December 2019	Beccles and Bungay Journal
Major Application; Affects Setting of Listed Buildings	28 June 2019	19 July 2019	Beccles and Bungay Journal
Category	Published	Expiry	Publication
Major Application	24 May 2019	17 June 2019	Lowestoft Journal

Category	Published	Expiry	Publication
Major Application	24 May 2019	17 June 2019	Beccles and Bungay Journal

Site notices

General Site Notice	Reason for site notice: Major Application; Affects Setting of Listed Buildings Date posted: 28 June 2019 Expiry date: 19 July 2019
General Site Notice	Reason for site notice: Departure; Major Application; Affects Setting of Listed Buildings Date posted: 29 November 2019 Expiry date: 20 December 2019

6. Planning policy

S38(6) of the Planning and Compensation Act 2004

National Planning Policy Framework

WLP1.1 - Scale and Location of Growth (East Suffolk Council - Waveney Local Plan (March 2019))

WLP1.2 - Settlement Boundaries (East Suffolk Council - Waveney Local Plan (March 2019))

WLP8.12 - Existing Employment Areas (East Suffolk Council - Waveney Local Plan (March 2019))

WLP8.13 - New Employment Development (East Suffolk Council - Waveney Local Plan (March 2019))

WLP8.14 - Conversion and Replacement of Rural Buildings for Employment Use (East Suffolk Council - Waveney Local Plan (March 2019))

WLP8.29 - Design (East Suffolk Council - Waveney Local Plan (March 2019))

WLP8.34 - Biodiversity and Geodiversity (East Suffolk Council - Waveney Local Plan (March 2019))

WLP8.35 - Landscape Character (East Suffolk Council - Waveney Local Plan (March 2019))

7. Planning considerations

Planning Policy Background

- 7.1. Section 38(6) of the Planning and Compulsory Purchase Act requires that, if regard is to be had to the development plan for the purpose of any determination to be made under the

Planning Acts, determination must be made in accordance with the plan unless material considerations indicate otherwise. The Development Plan for the district (former Waveney area) consists of: The East Suffolk Council - Waveney District Local Plan (adopted 20 March 2019) ("The Local Plan"); and any Neighbourhood Plans in effect, although there is no NP covering the application site. The relevant Local Plan policies are listed chapter 6 of this report.

7.2. Since the previous application and the 2018 appeal decision a new National Planning Policy Framework (NPPF) was published in February 2019 and is a material consideration in assessing planning applications; the Local Plan has also since been adopted (March 2019).

7.3. NPPF paragraph 83 states:

"Planning policies and decisions should enable:

- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed 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 84 states:

"Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist."

Paragraph 170 states:

"Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services - including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to*

improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate."

- 7.4. The NPPF supports sustainable growth and expansion of all business in rural areas including through well-designed new buildings and support for the diversification of agricultural operations. The NPPF continues to place a high value on conserving and enhancing the natural environment including by protecting and enhancing valued landscapes and recognising the intrinsic character and beauty of the countryside.
- 7.5. The Local Plan was examined by the Planning Inspector in accordance with the National Planning Policy Framework and adopted in March. It replaces the old Waveney Core Strategy (2009); the Development Management Policies adopted in January 2011; the Site Specific Allocation adopted in January 2011; the Lowestoft Lake Lothing & Outer Harbour Area Action Plan adopted in January 2012; and the associated policy maps. The adoption of the new Local Plan, therefore, represents a significant and material change to relevant planning policies since the previous planning application DC/17/0410/FUL was determined and subsequently dismissed at appeal in 2018.

Principle of Development

- 7.6. The old Waveney Core Strategy contained planning policy CS01 - Spatial Strategy. CS01 directed most of the new growth to Lowestoft, Market towns and large villages. However, CS01 also stated that:

"Outside these locations, development will be regarded as being in the open countryside where the objective is to preserve the countryside for its own sake. Exceptions to this overall approach will be infill housing development and affordable housing that meets a local need, both subject to the character and form of the settlement and access to services and facilities. Other exceptions will be developments of an appropriate scale that contribute to the continued viability of the agricultural industry and/or diversify the local rural economy."

- 7.7. The old planning policy CS01 - Spatial Strategy has essentially been replaced in the new Local Plan by policy WLP1.1 - Scale and Location of Growth. Large areas of Waveney, including the villages and some of the smaller towns, are classified as rural. Policy WLP1.1 directs a significant proportion of growth to Lowestoft, but also directs housing and employment growth to towns and villages located in rural areas. Unlike the old policy CS01, WLP1.1 does not include exceptions for the agricultural industry or diversification. Instead, WLP1.1 provides for "sustainable growth and expansion" through site allocations and policies that permit the "conversion of existing buildings and well-designed new buildings". It also offers the additional flexibility of allowing Neighbourhood Plans to allocate growth to meet local needs. The application site is not allocated for employment in either the Local Plan or in a Neighbourhood Plan.
- 7.8. Planning Policy WLP1.2 - Settlement Boundaries does not permit employment development in areas outside settlement boundaries that are classed as countryside, except where specific policies in the Local Plan indicate otherwise. The site is located some

distance from the nearest settlement boundaries at Bungay, Beccles, Ringsfield and Iketshall St Lawrence and Spexhall and is therefore countryside, for planning purposes.

- 7.9. The new Local Plan has no direct equivalent to the old policy CS07 - Employment. CS07 stated: *"Outside the towns proposals to diversify the rural economy will be encouraged, particularly where they are located in or adjacent to the larger villages. The development should be of a scale and character appropriate to the location and there should be good access to the transport network and public transport. Farm diversification proposals will be supported where they can make a long-term contribution to sustaining the agricultural enterprise as a whole and where the proposal is consistent with its rural location."*
- 7.10. The new Local Plan has three employment policies:
- WLP8.12 - Existing Employment Areas;
 - WLP8.13 - New Employment Development; and
 - WLP8.14 - Conversion and Replacement of Rural Buildings for Employment Use.
- 7.11. The new Local Plan policies collectively allow the development of employment land in existing employment areas, on land allocated in the Local Plan, on land allocated in Neighbourhood Plans (all identified on the relevant policy maps); within settlement boundaries where development is acceptable in principle; on land outside settlement boundaries but adjacent to existing employment land; through the conversion of existing rural buildings; and through the replacement of existing rural buildings.
- 7.12. The application site is not located within an existing or allocated employment area as defined by Policy WLP8.12 and the Waveney District Policy Maps. The existing use of the site is agricultural, not employment use, and the site is devoid of buildings. The principle of development therefore does not accord with the objectives of Policy WLP8.12 - Existing Employment Areas.
- 7.13. The application site is not located in an Existing Employment Area or a within a Settlement Boundary, and the site is also not located adjacent to an Existing Employment Area (as drawn on the policies maps). The principle of development therefore does not accord with the objectives of Policy WLP8.13 - New Employment Development.
- 7.14. The application site is devoid of buildings that could be converted or replaced. Thus, the criteria of policy WLP8.14 is not applicable to this proposal.
- 7.15. Thus, for the reasons given, the principle of development is contrary to the Local Plan spatial strategy policies WLP1.1 and WLP1.2; along with specific employment policies WLP8.12, WLP8.13 and WLP8.14.
- 7.16. Pursuant to the section 38(6) exercise, it then turns to whether there are material considerations that would indicate a decision other than in accordance with the Development Plan. One of those key considerations is the economic case for development, addressed in the next section.

Economic Benefits

7.17. The Local Plan allocates a number of sites for employment use. The allocated employment sites nearest to the application site are at Ellough, Beccles, Halesworth and Bungay and are listed as follows:

- WLP3.1 - Beccles and Worlingham Garden Neighbourhood allocates land for employment development including B8 uses.
- WLP3.3 - Land south of Benacre Road at Ellough Airfield, Ellough allocates 13.4 hectares of land suitable for B8 use.
- WLP4.6 - Broadway Farm, west of Norwich Road, Halesworth allocates 2.64 hectares of land suitable for B8 use.
- WLP5.2 - Land West of St Johns Road, Bungay allocates 3 hectares of employment land. The total site allocation is 21 hectares.

7.18. All of the sites listed have been allocated in the Local Plan because they are viable and deliverable over the plan period. So, the question that follows is: can the proposed development be located on an allocated employment site or within an existing employment area?

7.19. Of critical relevance are some of the conclusions of the Inspector in the 2018 appeal decision:

"St Johns Hall Storage is closely interconnected with St Johns Hall Farm and makes an important contribution to the ongoing viability of the latter. The co-location of the two businesses provides flexibility with storage staff helping on the farm at peak times and vice-versa. The office base on site is also shared and from this and the nearby farmhouse the appellant is able to manage and oversee both operations flexibly, seven days a week. Both businesses benefit, the storage service being more flexible and cost effective than it otherwise would be and the farm benefiting from an important financial contribution putting it on a more solid long term footing." (paragraph 13);

"The interconnected operation and joint oversight of both businesses require a single site and it is therefore most unlikely that St Johns Hall Storage would expand by operating a warehouse elsewhere. Operating from two sites would be less efficient, involving duplication and reduced flexibility" (paragraph 15); and

"To conclude on the economic benefits, there is a good case for the proposal, both to continue the diversification of the farm operation to further secure its future and as a much needed expansion of the successful storage business in its own right. This would generate a significant number of additional jobs both on site and in the local companies which use the storage space to develop their own businesses. In all these ways there would be real benefits for the local economy." (paragraph 16).

7.20. The applicant's Design and Access Statement (DAS) addresses this question and sets out that the economic risk of building a single, serviced building on a separate site does not stack up. There is also the fact that expanding the existing site means that the proposal will benefit from economies of scale and shared resources with the farm. As identified by the Inspector, that sharing of resources with the farm carries mutual benefits for both the

agricultural and storage enterprises - benefits that could not be derived from a split-site operation.

- 7.21. The proposal brings the short-term benefit of a £1.2 million capital investment. The applicant contends that the proposal will generate 4-6 new jobs in year 1 and 8-10 new jobs by the end of year 2; this would be in addition to the existing 12 staff that are employed. That is a considerable public benefit in its contribution to the rural economy.
- 7.22. The more significant benefit to the rural economy relates to the role that St John's Hall Storage (and its proposed expansion) plays in supporting the warehousing demands of businesses in the locality. The operation provides commercial storage for 16 local businesses within a 15-mile radius, in addition to 12 more distant businesses. The operation provides flexible storage where customers can store goods/components by-the-pallet in order to reduce cost and allow for smaller scale storage, particularly for start-up businesses where the cost of renting an entire warehouse space would be prohibitive. The application and DAS also include a number of letters from customers of the storage business setting out how the operation has supported their commercial needs. One of those key businesses is St Peter's Brewery which is a rural enterprise located some 3km from the site. St John's Hall provides all of the brewery's storage requirements which are quite unique in that storage of their product has to be within a 5-mile radius of where it is brewed; St Peter's Brewery is one of the three largest customers at St John's Hall Storage and attended the appeal hearing in 2018 to set out how they would benefit from the increased storage offer.
- 7.23. The applicant sets out that the businesses that currently store goods with St John's Hall provide in the region of 900 jobs. The applicant has also explained that the additional storage building is required because existing buildings are at capacity, yet demand is high for the per-pallet storage offer at the site.
- 7.24. The role that St John's Hall Storage plays in supporting the operational requirements of local businesses is very important to the rural economy in this part of the District. The Council's Economic Development Team has identified that the proposal will support the economic growth ambitions outlined in both local and regional strategies (the East Suffolk Growth Plan, the East Suffolk Business Plan, the Suffolk Growth Strategy and the Norfolk and Suffolk Economic Strategy). The Council's Economic Growth Plan states the importance of supporting entrepreneurs, encouraging existing businesses to grow, and attracting businesses to the area. All of this requires suitable premises to be available in order to meet the needs of start-up businesses and growing businesses and their local supply chain.
- 7.25. The proposed expansion of the site, to meet storage demand and provide continued operational support for local business, is a public benefit that should be given considerable weight.
- 7.26. In the 2018 appeal decision, the Inspector arrived at a similar conclusion on the economic case for development; however, the appeal was dismissed because those benefits were outweighed by the visual impact of the building:

"There is a good case for the proposal both in terms of farm diversification and as a much needed expansion of a successful storage business in its own right. There is also a lack of

alternative provision in the locality to meet the needs of local businesses. However, the undoubted benefits for the local economy are outweighed by the excessive visual impact of the unduly large building in the rural landscape. The planning balance is consequently against the proposal and therefore the appeal should be dismissed." (paragraph 27).

- 7.27. The outcome of the appeal was that the economic benefits of the proposal indicated for the development, but that it was the design/appearance and landscape impact of the proposed building in the countryside that led to the appeal being dismissed. Thus, it then turns to whether the amended proposals subject of this current application overcome the landscape harm previously identified.

Impact on the Character and Appearance of the Countryside

- 7.28. The application is supported by a Landscape and Visual Impact Assessment (LVIA) that is written in accordance with professional standards for such reports; its content has been reviewed by officers, including the Council's Arboriculture and Landscape Manager who has no objections to the proposed development.
- 7.29. Local Plan Policy WLP8.35 - Landscape Character - sets out that: development proposals will be expected to demonstrate that their location, scale, form, design and materials will protect and enhance their environment; and that proposals should include measures that enable a scheme to be well integrated into the landscape. Development will not be permitted where it would have a significant adverse impact on the landscape and scenic beauty of the protected landscapes (Broads area or Suffolk Coast and Heaths AONB) and their settings.
- 7.30. The buildings at St Johns Hall are situated in a large scale gently rolling rural landscape comprising open arable farmland dissected by shallow valleys, some hedgerows and small blocks of woodland. The area of the site allocated for the new storage unit is contained by existing large buildings to the south and west, which effectively screen it in views from these directions. However, there is the potential for longer distance views towards the site from points on lanes and public rights of way in the surrounding landscape. The site also has particular visual sensitivities given its location on the valley side within an area of countryside.
- 7.31. In terms of the 2018 appeal decision, the Inspector's findings on landscape and visual impact are relevant:

"The building would both project several metres closer to Low Road than building B and considerably further east into the field than the grain store building C, thus increasing its visual prominence when seen from the north-west round to the north-east. Whilst joining an existing group of buildings and in many views seen in front of buildings C and B, the new building would appear both closer (therefore larger) and/or extend to the side of the others, sometimes by some distance, resulting in an unduly intrusive addition to the group." (paragraph 21); and

"The building would also have a significant visual impact in a number of medium and long distance views from the east and south-east... The building would project out into the field to the north east of the existing group well to one side of building B behind and the double gable end would draw attention to its bulk compared to the others. The 53 m wide

end elevation of the new building combined with its 11-13.5 m height and position extending the built form of the group would result in an over prominent addition to the landscape." (paragraph 23).

- 7.32. The applicant, in their DAS, succinctly summarises those concerns into three main factors:
1. The extent of protrusion of the building into the open countryside;
 2. The size of the building (especially in comparison with neighbouring buildings); and
 3. The detail (landscaping, appearance of bulk etc).
- 7.33. This application is an amended proposal in order to address those areas of concern. The key changes from the appeal scheme are:
- The orientation of the building has been changed from east-west to north-south;
 - The building has been re-positioned to the southwest closer to existing buildings;
 - The building is now set 15 metres further back from Low Road;
 - The building would project into the field 44 metres less, positioned some 14 metres west (behind) building C;
 - The buildings' length has been reduced by 10.72 metres, and its width reduced by 1 metre - a floorspace reduction of approximately 15%; and
 - The eaves height has been reduced by 1.85 metres (along with a minor reduction in ridge height).

Assessment of Impact

- 7.34. The proposed building is of similar size to the recent new storage units that have been added to the site, although it will sit at a lower level compared to the adjacent grain store to the south. It is inevitable that a building of this size will have some degree of impact on the surrounding landscape and those who are in - and moving through - that landscape. The submitted LVIA accepts that there will be an adverse effect on the landscape and that, immediately post-construction, there will be a change in landscape quality of Medium magnitude. This is a worst-case scenario before new mitigation planting establishes and matures. After 15 years once the new planting is in its established maturing phase, the significance of these adverse effects on landscape are anticipated to reduce from Moderate to Minor. Officers consider that this conclusion can be relied on and has been derived following a full consideration of the prevailing sensitivity of the surrounding landscape; the role that the existing farm buildings play in the landscape; the screening effect of existing surrounding trees and hedgerows; the proposed mitigation planting and the suitability of this planting on the prevailing landscape character. On this latter point, although it has been agreed with the applicant's landscape architect that the existing planted earth bunds can be retained and incorporated in to the proposed mitigation planting, nonetheless the proposed new planting has been carefully selected in terms of species and layout to closely reflect the prevailing surrounding landscape fabric and character. These important extra measures prevent the new planting becoming an anomalous feature in the landscape like the built structure it is trying to screen. New planting that has wider landscape benefits has added value in offsetting any adverse effects of the new building.
- 7.35. With regard to visual effects, it is considered that the new building would have a moderate visual influence on the wider surrounding area, taking due account of the influence of

surrounding existing surrounding buildings, plus hedgerows and woodland blocks further afield. The proposed new planting will progressively screen and break up the outline of the new building and the significance of adverse visual effects will gradually decline. It should be noted that the new planting will also contribute to screening of existing buildings as well and will also bring positive benefits to landscape character in its own right. It is anticipated that there will be some residual visual effects, mainly for viewers from the north east, and that at Year 15 these residual effects would be Moderate-Minor and Neutral in significance for four of the receptors; and for one other receptor there would be a residual effect of Minor Neutral significance. For these receptors there would be no perceived extension of the building cluster footprint. Where the new building would be seen as extending beyond the existing building edges, there are eight receptors where the perceived residual visual effects will be of Minor-Moderate Adverse significance; and two receptors where residual effects would be Negligible. Overall there will be no anticipated Significant Adverse visual effects in the long term.

- 7.36. Overall, it is predicted that there are likely to be some limited landscape and residual effects arising from the proposed development, but it should be recognised that the proposed landscape mitigation planting will bring positive landscape character benefits as it has been designed to reflect prevailing landscape character and fabric. The significant amendments to the size, position and detail of the building - in addition to a comprehensive landscaping strategy - is a marked improvement on the appeal scheme. It is thus considered that the landscape and visual impact of the proposal is acceptable in accordance with the objectives of policies WLP8.35 and WLP8.29 - and that the main ground for the 2018 appeal dismissal has been successfully overcome. This does not change that the principle of development is not supported by the spatial strategy objectives of policies WLP1.1 and WLP1.2; along with employment policies WLP8.12, WLP8.13 and WLP8.14. However, it is relevant that where those employment policies require development proposals are of good design and have an acceptable visual impact, the proposal is policy compliant, in that regard.

Heritage Considerations

- 7.37. The Planning (Listed Buildings and Conservation Areas) Act 1990 ("The Act") sets out, in section 66, the statutory duty of decision-takers in respect of listed buildings:

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

- 7.38. This statutory requirement is reflected in chapter 16 of the NPPF which sets out (inter alia):
- That heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance (para. 184);
 - That applicants should describe the significance of any heritage assets affected, including any contribution made by their setting (para. 189);
 - That great weight should be given to the conservation of heritage asset's and, the more significant the asset, the greater the weight should be (para. 193);
 - That any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification; and

- That where harm would arise, it must be properly weighed against the public benefits of the development (paras. 195 & 196).

- 7.39. The applicant has provided a Heritage Impact Assessment (HIA) that meets the requirements of NPPF paragraph 189.
- 7.40. The application has been advertised as affecting the setting of listed buildings and, because some of those buildings are listed grade II* and grade I, Historic England has been consulted on the application, but they have no comments to offer.
- 7.41. The key listed buildings affected by this development proposal are the grade II listed St John's Hall; and the grade II* listed Church of St. John the Baptist. Two other listed buildings (the Church of St Lawrence, listed grade II*; and St Andrew's Church, listed grade I) are potentially affected by the development proposal but are at a much greater distance from the application site.
- 7.42. The surrounding landscape is defined in the Suffolk County Council landscape character assessment as Rolling Valley Claylands. The assessment states that:

"These river valley slopes, with their combination of closeness to water and better-drained and more easily cultivated soils, have been foci for settlement in the claylands from an early date."

It goes on to say:

"Across the claylands there is a repeated pattern of former manorial halls and their associated churches on the sides of the river valleys, even when some of these 'valleys' are no more than small folds in the plateau. The important combination is access to water and sloping land with good arable potential. The pattern was certainly established by the 11th century and may be at least a century or two older. In places the original hall-and-church complexes have grown into hamlets or villages, but others have retained their original identity."

- 7.43. In respect of the application site and its surroundings, it appears to be the pattern here with the Church of St John the Baptist and St John's Hall being positioned along the valley. These two key buildings have remained clear separate elements retaining their original identity as isolated structures. Therefore, this relationship is of very high significance between the buildings themselves and as a feature within the countryside.

Current Arrangement

- 7.44. All of the agricultural buildings/yards are located to the north of the hall. A number of these structures are historic farm buildings, these being located closer to the hall with later, larger agricultural buildings - and two warehouses (connected to farm diversification) - placed further away.
- 7.45. There are three vehicular accesses to the various sections of the complex. One is to the farmhouse; one to the farm; and one to the warehouses. The three large buildings of the

complex are sited to the north (warehouse); north/north-east (warehouse); and north-east/east (farm building) of the listed building.

- 7.46. To the south of the hall are garden areas enclosed by features such as a crinkle-crankle wall and a moat. This northern approach to the complex has a predominantly residential character and the grounds are currently well treed.

Views from-and-to the Listed Building and Historic Farmstead

- 7.47. The current arrangement to the north of the hall leaves a gap between the structures which allows a visual connection out from the listed farmhouse (and its environs) north-east to the farmland. Equally, and perhaps more importantly in this case, this gap allows views to be gained between the structures back towards the Listed building on rising ground when traveling west along Low Road towards the Church. The strong historic relationship between the farmhouse and its land is of high significance, that it is why the farmstead evolved where it did.
- 7.48. Equally as important are the views afforded towards the listed building and the farmstead as a whole, from the surrounding countryside. Currently the listed farmhouse can be seen in the distance, tucked between the surrounding large structures, on the rising ground from the adjacent Low Road. Thus, it is clear to the observer that it is an historic site, with an expanded "farmyard" of later larger agricultural buildings. As one travels on along Low Road this relationship between the farmstead and the church can be appreciated. Therefore, development which breaks down this character will have a harmful effect.

Impact of the Proposal

- 7.49. The proposed building will block the gap which currently exists to the historic elements of the site resulting in continuous modern development of buildings around the historic complex viewed to and from the north. This will have a negative impact on the setting of the listed building which causes harm to its significance as a Farmhouse because the proposal will be reduce the inter-visibility between the farmstead and the farmland. However, that intervisibility between the Hall and the farmland will eventually be lost, irrespective of this application, once the existing tree belt planting atop the bund is fully established. In terms of the grade II listed Hall, the proposal would give rise to a low to moderate level of harm.
- 7.50. Given the separation of the site from the three listed churches in the locality, along with proposed mitigation planting and that the building would be positioned adjacent - and read as part of - the existing farm complex, it is considered that there would be no harm to the significance of the listed churches that are all at least 250 metres from the application site.
- 7.51. The harm to the grade II listed Hall would be a low-to-moderate level of less than substantial harm. Even though such harm is 'less than substantial', in NPPF terms, this harm must be given great weight by the decision-taker and properly weighed against the public benefits of the proposal. For the purposes of this recommendation, that balance will be undertaken in the concluding section of this report.

Highways and Transport Impacts

- 7.52. Local Plan Policy WLP8.29 promotes (inter alia) development that is proportionate in scale to the existing transport network and would not result in severe impacts on the highways network. Chapter 9 of NPPF provides clear guidance on considering development proposals:

Paragraph 108 - "it should be ensured that... (b) safe and suitable access to the site can be achieved for all users"; and

Paragraph 109 - "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

- 7.53. Suffolk County Highways Authority are a statutory consultee and they have identified that the existing vehicle access onto the A144 is satisfactory to serve the existing and proposed development. The applicants Design and Access Statement (DAS) sets out that the site currently generates ten HGV movements to the site per day. The DAS goes on to explain that pallets are transported to-and-from the site by third party carriers and then via hubs to and from the HGV distribution network. The applicant considers that the number of pallets will increase but that this is not likely to result in an increase in the number of HGV trips to-and-from the site. It seems likely that the increased floorspace will lead to some additional traffic generation, but it is not likely to be significant or particularly discernible in the context of existing traffic on the A144. The Highways Authority note that even if the proposal does increase vehicular movements to-and-from the site, the access onto the highway is suitable for this and no concerns have been raised over cumulative, residual impacts on the highways network. Whilst the concerns of local residents over traffic generation are noted, the evidence provided and consultation with statutory consultees indicates that the proposal is not unacceptable, in highways terms. The NPPF provides clear guidance on when applications should be refused on highways grounds and this is not an instance where such a refusal is justified. The proposal accords with WLP8.21 and the NPPF transport objectives.

Local Residential Amenity

- 7.54. Local Plan Policy WLP8.29 (Design) requires that development proposals protect the amenity of the wider environment, neighbouring uses and provide a good standard of amenity for future occupiers of the proposed development. In terms of direct impact such as access to daylight/sunlight and privacy levels, the proposal would have no impact as the complex at St John's Hall is a significant distance from any residential properties. In respect of the listed Hall, the proposed building would be positioned far enough away where no direct losses of light or privacy would arise.
- 7.55. The main amenity concerns raised by local residents relate to a change in outlook and visual impact from the proposal; increase in traffic generation; noise pollution; and light pollution.
- 7.56. As set out earlier in this report, the visual impact of the development is considered to be acceptable and markedly improved from the 2018 appeal proposal. Furthermore, the traffic generation has also been addressed and not deemed to be significantly adverse so as to justify refusal.

- 7.57. In terms of noise pollution, officers walked the site and surroundings inclusive of Lodge Road, Low Road, Great Common Lane, and public rights of way (PRoW) Nos. 2, 3 and 4 which run through fields surrounding St John's Hall. The experience in the area is that the background noise level is fairly high due to the constant flow of traffic along the A144 which is immediately adjacent St John's Hall. Although a rural area, this is not a highly tranquil location where noise from the commercial operation is completely alien and intrusive. It is also relevant that part of the operation at St John's Hall is farming, and the vehicular movements and noise associated with an agricultural use are not controlled by planning. There is also an existing storage use in operation and no evidence has been provided by third parties to demonstrate that there would be significantly increased noise levels at the site. Given how distant St John's Hall is from other residential properties, it seems very unlikely that any noise arising from the new building would be seriously harmful to local amenity, or particularly discernible in the context of the existing use and noisy A-road adjacent.
- 7.58. In terms of light pollution, the proposal shows 4x8 metre lighting columns with floodlights and 11 wall mounted floodlights at heights varying from 8 metres up to 10.5 metres. The County Council Highways Street Lighting Team has provided guidance on the proposed external lighting suggesting that the tilt of higher level lanterns should be set to zero degrees to help reduce light spill which may be seen by local residents from a distance. The applicant has amended the proposed lighting plan as such. Officers consider that this will reduce the light pollutions impacts down to an acceptable level. Furthermore, as mitigation planting establishes over time, the light spill will reduce.
- 7.59. It is accepted that additional lighting will be visible from wider viewpoints, but visibility does not equal harm. The adjacent A-road will be trafficked at night by vehicles with headlamps on and St John's Hall, as a complex, is a significant distance from any residential properties. Therefore, it is not considered that light-spill from the proposals will erode the living conditions of local residents.
- 7.60. For the reasons set out, the amenity impact of the development is acceptable in accordance with WLP8.29.

Surface Water Drainage

- 7.61. Local Plan Policy WLP8.24 (Flood Risk) sets out, among other things, that development proposals should consider flooding from all sources and take into account climate change and that proposals should use sustainable drainage systems to drain surface water that are integrated into the landscaping scheme. Chapter 14 of the NPPF sets out planning for flood risk:
- Development should be directed away from areas at highest risk (para. 155).
 - Local planning authorities should ensure that flood risk is not increased elsewhere, and applications should be supported by a site-specific flood-risk assessment. Development proposals in higher risk areas should demonstrate that:
 - Within the site development is directed to the lowest risk areas;
 - The development is appropriately flood resilient and resistant;
 - The development incorporates sustainable drainage systems;
 - Any residual risk can be safely managed; and
 - Safe access and escape routes are provided. (para. 163)

- Major developments should incorporate sustainable drainage systems (para. 165).

- 7.62. The proposal is supported by a flood risk assessment (FRA) and surface water drainage strategy that has been subject of review by engineers at the Local Lead Flood Authority (LLFA) at Suffolk County Council. The site is considered to be a low risk of flooding from all sources except surface water flooding which is considered to present a low to medium flood risk.
- 7.63. In terms of surface water, the total impermeable areas from existing and proposed development equates to some 0.924 hectares that needs to be properly drained. The proposed development incorporates a sustainable drainage systems (SuDS) that utilises a restricted discharge of surface water runoff into an adjacent watercourse owned by the applicant, that already receives greenfield run-off from the site. An attenuation basin is also proposed to accommodate the 100-year plus climate change (+20%) storm event. The proposal also incorporates a dry swale into the design.
- 7.64. The drainage strategy as updated is acceptable to the LLFA who have removed their holding objection and recommend that any planning permission granted impose conditions to secure the implementation of the strategy as submitted. As such, the proposal accords with policy WLP8.24.

Other Matters

- 7.65. The grain store approved under DC/13/0083/FUL (building C) is currently being used for unauthorised commercial storage, and subject of an enforcement complaint ref. ENF/2018/0285/USE. In response to that, the applicant has explained that should permission be granted for the new storage building, that unauthorised use of the grain store will cease. Resolving an enforcement case is not reason to approve this application; however, nor is an existing enforcement matter considered to be grounds to refuse the current application. Officers consider that, irrespective of the outcome of this application, enforcement processes will need to be followed to ensure the grain store is used for its authorised agricultural purpose, or otherwise the proper applications made seeking an alternative use.
- 7.66. The comprehensive landscaping strategy with mitigation planting, in addition to the attenuation basin, fall outside the red line area shown on the application site plan; however, this land is all in the applicant's ownership denoted by the blue line. Thus, to secure that these important elements of the development proposal are secured and implemented fully, it would be necessary to impose a condition on any planning permission requiring that the landscaping and SuDS features are implemented at the appropriate stage. As the land is in the applicants control and forms part of the wider complex, it is clear that these works can be delivered and therefore a condition as such is an appropriate mechanism of delivery.
- 7.67. In terms of ecology, the site is former farmland and of little habitat value. Thus, the proposal would not lead to losses of protected species and/or habitats. New mitigation planting, once established, is likely to be of greater habitat value than the existing site condition.

- 7.68. The Council's Environmental Health Team have reviewed the application and raise no objections. There are no known ground contamination sources at the site requiring investigation/remediation but, in any event, the proposal is not for a sensitive end-use such a residential development.
- 7.69. The site is not a known area of archaeological interest and thus there is no requirement for ground investigation secured by conditions.

8. Conclusion

- 8.1. The principle of development is contrary to the Local Plan spatial strategy policies WLP1.1 and WLP1.2; along with specific employment policies WLP8.12, WLP8.13 and WLP8.14 - which, in combination, seek to deliver employment growth within existing settlement boundaries; within existing employment areas (or adjacent to those areas); and through conversion of existing rural buildings.
- 8.2. The section 38(6) exercise that gives the development plan primacy in decision-taking would normally indicate that planning permission be refused. However, there are some instances where material considerations indicate a decision should be made otherwise than in accordance with the plan.
- 8.3. The 2018 appeal decision is a material consideration and sets out that the main issue, at that time, was to balance the economic benefits of the proposal against the visual impact on the character and appearance of the countryside. As set out in this report, the proposal has been substantially amended and is considered acceptable in terms of its landscape and visual impact in accordance with Policy WLP8.35; furthermore, the well-designed mitigation planting proposals will actually deliver some landscape character benefits and better screening of existing buildings. There would also be considerable economic benefits. The proposal would bring about, potentially, up to ten FTE positions within the first two years of the building being in use. More significantly, the proposal would expand the commercial storage offer at the site that makes such an important contribution to meeting the operational needs of many local businesses. Supporting the expansion of St John's Hall Storage will also help ensure the long-term viability of the business, and also the closely connected farming enterprise based at St John's Hall. It is unrealistic for the new building to be delivered on a separate site given the close interrelationship between the storage and agricultural enterprises.
- 8.4. The NPPF is also a material consideration and sets out that: significant weight should be placed on the need to support economic growth and productivity (paragraph 80); and that planning decisions should enable the development and diversification of agricultural and other land-based rural businesses (paragraph 83b); and that decisions should recognise that sites to meet local business and community needs in rural areas may have to be found beyond existing settlements that are not well served by public transport (paragraph 84). It is thus considered that the NPPF position on building a strong, competitive economy is very supportive of the development proposal. The proposal is also supported by the economic growth ambitions outlined in both local and regional strategies (the East Suffolk Growth Plan, the East Suffolk Business Plan, the Suffolk Growth Strategy and the Norfolk and Suffolk Economic Strategy).

- 8.5. There would be a low-to-moderate level of harm to the significance of St John's Hall as a grade II listed farmhouse through development within its setting as the new building will remove some of the visual link between the farmhouse and wider farmland to the north. Although that level of harm, in NPPF terms, is considered to be 'less than substantial' it must still be given great weight by the decision taker and properly weighed against the public benefits of the proposal.
- 8.6. Officers are aware that this is a finely balanced decision with a number of issues to consider. However, weighing all of the issues, giving great weight to the harm to the listed farmhouse, and with regard to all matters raised through the consultation process, officers consider that the economic benefits of the proposal outweigh the harm that would arise, including the conflict with the Local Plan in terms of the principle of development. The amended proposals have overcome the main appeal dismissal ground in terms of visual impact, and this is an instance where a departure from the Local Plan is justified in order to support a rural enterprise and deliver significant economic benefits in accordance with the objectives of the Council's Business Plan. Thus, planning permission should be granted.

9. Recommendation

- 9.1. The Town and Country Planning (Development Management Procedure) (England) Order 2015 (The DMPO) requires that any application that does not accord with the statutory provisions of the development plan in force in the area in which the land to which the application relates is situated, be advertised by site notice and in the local press. That publication process has been undertaken and will close on 31 December 2019. Any further representations received prior to the committee meeting on 19 December 2019 will be reported to members via the update sheet and verbally at the meeting. Officers therefore are seeking authority to approve the application, subject to no new material planning objections being received post-committee, and prior to the 1 January 2020.
- 9.2. **AUTHORITY TO APPROVE**, subject to no new material planning objections being received post-committee, and prior to the 1 January 2020.

Conditions:

1. The development hereby permitted shall be begun within a period of three years beginning with the date of this permission.

Reason: In accordance with Section 91 of the Town and Country Planning Act 1990 as amended.

2. The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

Landscape and Visual Impact Assessment (revised 29th August 2019); and Mitigation Proposal Drawing Nos. E17879-TLP-001 and E17879-TLP-002, received 05 September 2019.

Flood Risk Assessment (FRA) (dated 16/08/2019, ref: BLI.2019.40), received 29 August 2019.

External Lighting Plan No. 0001850397-EX-R1B-220719, received 22 July 2019; and Proposed lighting product details, received 17 June 2019.

Site Location Plan No. 1375/GEN/00 rev A; Proposed Plans and Elevations No. 100; Proposed Site Plan No. 1375/GEN/003 rev A; and Proposed Site Cross-Sections No. 1375/GEN/005 rev A, all received 03 May 2019.

Reason: For the avoidance of doubt as to what has been considered and approved.

3. No works or development shall commence until a full specification of all proposed tree and hedge planting (in accordance with the approved mitigation proposal drawing No. E17879-TLP-002 within the approved Landscape and Visual Impact Assessment) has been submitted to and approved in writing by the local planning authority. The specification shall include the quantity, size, species, and positions or density of all trees to be planted, how they will be planted and protected and the proposed time of planting. The tree planting shall be carried out in accordance with the approved specification unless otherwise approved in writing by the Local Planning Authority.

Reason: To ensure a well laid out scheme of landscaping in the interest of good design and mitigating the impacts of the proposal on the character and appearance of the countryside.

4. No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to, and approved in writing by the local planning authority. The Statement shall provide for:
 - a) parking and turning for vehicles of site personnel, operatives and visitors
 - b) loading and unloading of plant and materials
 - c) piling techniques
 - d) storage of plant and materials
 - e) programme of works (including measures for traffic management and operating hours)
 - f) provision of boundary hoarding and lighting
 - g) details of proposed means of dust suppression
 - h) details of measures to prevent mud from vehicles leaving the site during construction
 - i) haul routes for construction traffic on the highway network and
 - j) monitoring and review mechanisms.
 - k) details of deliveries times to the site during construction phase

The approved Construction Method Statement shall be adhered to throughout the construction period for the development.

Reason: In the interest of local amenity and protection of the local environment during construction.

5. No development shall commence until details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and approved in writing by the local planning authority. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP shall include:

a. Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include:-

- i. Temporary drainage systems
- ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses
- iii. Measures for managing any on or offsite flood risk associated with construction

Reason: To ensure the development does not cause increased flood risk, or pollution of watercourses or groundwater.

6. All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons following the commencement of the development; and any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species.

Reason: To ensure the landscaping strategy is implemented in a timely manner.

7. The strategy for the disposal of surface water and the Flood Risk Assessment (FRA) (dated 16/08/2019, ref: BLI.2019.40) shall be implemented as approved in writing by the local planning authority. In addition to the approved FRA, a penstock must be located between the outfall of the approved attenuation basin and the outfall to ordinary watercourse. The strategy shall thereafter be managed and maintained in accordance with the approved strategy.

Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal, to ensure that the proposed development can be adequately drained

8. The development hereby permitted shall not be occupied until details of all Sustainable Drainage System components and piped networks have been submitted, in an approved form, to and approved in writing by the Local Planning Authority for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure that the Sustainable Drainage System has been implemented as permitted and that all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as per s21 of the Flood and Water Management Act 2010 in order to enable the proper management of flood risk with the county of Suffolk.

Informatives:

- 1. The Local Planning Authority has assessed the proposal against all material considerations including planning policies and any comments that may have been received. The planning application has been approved in accordance with the objectives of the National Planning Policy Framework and local plan to promote the delivery of sustainable development and to approach decision taking in a positive way.
- 2. Drainage:
 - Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991.

- Any discharge to a watercourse or groundwater needs to comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017.
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board catchment is subject to payment of a surface water developer contribution.

3. East Suffolk Council is a Community Infrastructure Levy (CIL) Charging Authority.

The proposed development referred to in this planning permission may be chargeable development liable to pay Community Infrastructure Levy (CIL) under Part 11 of the Planning Act 2008 and the CIL Regulations 2010 (as amended).

If your development is for the erection of a new building, annex or extension or the change of use of a building over 100sqm in internal area or the creation of a new dwelling, holiday let of any size or convenience retail , your development may be liable to pay CIL and you must submit a CIL Form 2 (Assumption of Liability) and CIL Form 1 (CIL Questions) form as soon as possible to CIL@eastsuffolk.gov.uk

A CIL commencement Notice (CIL Form 6) must be submitted at least 24 hours prior to the commencement date. The consequences of not submitting CIL Forms can result in the loss of payment by instalments, surcharges and other CIL enforcement action.

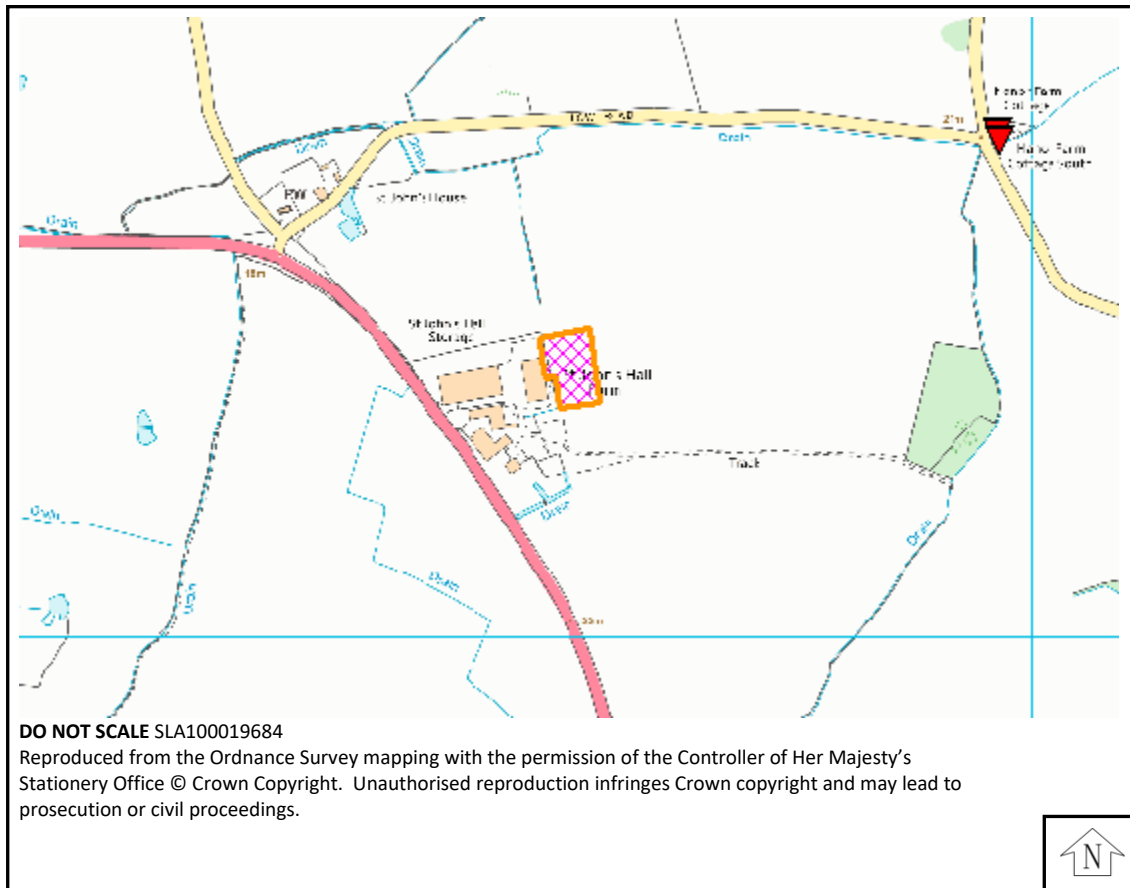
CIL forms can be downloaded direct from the planning portal:

https://www.planningportal.co.uk/info/200136/policy_and_legislation/70/community_infrastructure_levy/5





Background information

See application reference DC/19/1831/FUL at <https://publicaccess.eastsuffolk.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=PQXI7NQX07400>

Map



Key

-  Notified, no comments received
-  Objection
-  Representation
-  Support