



## Committee Report

**Planning Committee South** – 23 November 2021

**Application no** DC/21/3303/OUT

**Location**

Clopton Commercial Park  
Debach Airfield  
Clopton  
IP13 6QT

**Expiry date** 7 October 2021

**Application type** Outline Application

**Applicant** Oasis Property Ltd

**Parish** Clopton

**Proposal** Extension to business park with erection of one and two-storey business units and studio/gym/creche

**Case Officer** Natalie Webb  
07825 754344  
[natalie.webb@eastsoffolk.gov.uk](mailto:natalie.webb@eastsoffolk.gov.uk)

### 1. Summary

- 1.1. This application seeks Outline Planning Permission (with only access to be considered) for the extension to Clopton Commercial Park, Debach Airfield, Clopton with erection of one and two-storey business units and studio/gym/creche.
- 1.2. The site lies in the countryside, where policy SCLP3.3 states that new employment outside of settlement boundaries will not be permitted unless specific policies state otherwise. The application site also lies outside of the employment allocation for the former Debach airfield site as identified by Local Plan Policy SCLP12.35, which primarily provides B Class Uses. No sequential test has been submitted to confirm that the proposed uses could not otherwise be located within the existing airfield site, a more sustainable location or employment area located within the district as required by Local Plan Policy SCLP4.2.

- 1.3. The application is therefore lacking in evidence as to why the existing employment site should be expanded and the development is not otherwise considered to accord with any of the policies within the Local Plan which would support new commercial or employment development in the countryside. Therefore, the development would be contrary to SCLP3.2, SCLP3.3, SCLP4.2, SCLP4.3 or SCLP4.5; the principle of development has not been established.
- 1.4. The application was presented to the referral panel on 28 September 2021, as officers are 'minded to refuse' contrary to Clopton Parish Council's support. The referral panel considered that there are material planning considerations which warrant discussion by the planning committee.

## **2. Site description**

- 2.1. The application site occupies a site area of 1.7 hectares (which includes the access road from the B1078) adjacent to the former Debach airfield employment site (SCLP12.35). The eastern runway is primarily utilised by Debach Enterprises, with the other businesses which form Clopton Business Park are located on the western runway. The rectangular site proposed for development under this application covers an area of around 1 hectare of undeveloped grassland west of the main airfield runway. The application site is separated from the former runway by an established hedge. To the east of the site are existing employment uses, to the west there are two large ponds surrounded by woodland, beyond which there are agricultural fields and agricultural buildings to the south-west. Further to the southwest is the Debach Airfield Museum. The nearest residential properties to the application site, are located on Drabbs Lane to the west. The site does not directly impact the setting of any designated heritage assets, nor is it within any designated areas. Public right of way Fp5 runs through the application site.
- 2.2. The site has a complex planning history, most recent applications include:
- DC/17/5419/FUL - Permitted - Erection of office extension to Unit 7. Erection of 6 business units Alterations to existing units 17 and 19.
  - DC/18/3763/OUT - Withdrawn - Outline Application (Some Matters Reserved) - Extension to business park with erection of one and two storey business units and studio/gym.
  - DC/19/1973/OUT - Withdrawn - Outline Application - Extension to business park with erection of one and two storey business units and studio/gym.
  - DC/19/3497/FUL - Permitted - Erection of business units.

## **3. Proposal**

- 3.1. The proposal seeks to develop the site with a series of business units suitable for a variety of small-scale enterprises, and to provide premises which can accommodate uses ancillary to the employment generating development of the site and the adjacent established employment areas. The business units are indicated to be a mix of one and two storeys. Whilst the exact uses for the site have not specifically been identified, the proposal identifies uses which would be ancillary to the existing main employment uses of the site, including a studio to provide space for a gym, nursery and café. The total site area of 1.7ha includes the access road from the B1078, with 1.07ha of the site being the

rectangle of land accommodating the business units, car parking and landscaped areas. The buildings shown on the illustrative layout are comprised of:

- Business Centre 750m<sup>2</sup>
- Terrace of 6no 100m<sup>2</sup> business units 600m<sup>2</sup>
- Terrace of 3no 125m<sup>2</sup> business units 375m<sup>2</sup>
- Terrace of 3no 250m<sup>2</sup> business units 750m<sup>2</sup>
- Studio/other uses 375m<sup>2</sup>

Total: 2850m<sup>2</sup>

- 3.2. Closest to the site entrance is a business centre offering small scale office spaces for micro enterprises and start-ups with supporting shared resources such as a central reception area and meeting rooms. Other buildings are arranged as terraces of units in basic sizes which have proved popular for small enterprises, but which are adaptable by combination to create larger units for expansion. The layout provides for vehicle parking close to individual units while retaining generous open areas for landscaping and views out over the wider landscape. The hedgerow on the eastern boundary between the site and the existing employment area would be retained.
- 3.3. Access to the site for pedestrians and vehicles is obtained over the existing access road from its junction with the B1078.
- 3.4. The application is for Outline Planning Permission with only access to be considered. Details relating to appearance, landscaping, layout and scale of the development would be subject to any subsequent reserved matters application.

#### 4. Consultations/comments

- 4.1. No third-party representations were received.

#### Consultees

##### Parish/Town Council

Consultee	Date consulted	Date reply received
Debach Parish Meeting	15 July 2021	No response
Summary of comments: No response received.		

Consultee	Date consulted	Date reply received
Clopton Parish Council	15 July 2021	2 August 2021
"It is noted that the proposed development is outside the current approved site boundary and therefore contravenes the Current Site Allocations and Area Specific Policies Development		

Plan, Document of January 2017' page 69 Policy SSP23. As it stands at the moment the local plan does not allow for an expansion at the Clopton Commercial Park site. In brief summary this explains that planning permission will be granted through re-development or refurbishment or other change of use of existing buildings. There is no provision for new buildings. Planning permission can be granted however if there is seen to be a need and want for such a development.

A principal concern is the impact that the development would have on the local road network. It is felt that the predicted Site access MCC Traffic Flow predictions underestimate the ultimate traffic flow to the site and the impact that this will have on the local road network. Particularly in view of the 135 car parking spaces and 7 motorcycle spaces proposed for the development.

The bus service to the village has been reduced now to a level where return travel from Woodbridge on the same day is impossible and return travel from Ipswich is limited. Should this application be granted Clopton Commercial Park would be a major area of employment and as such a reliable bus service should be available. This needs addressing.

The increasing number of HGVs utilising the road network through Clopton and the neighbouring villages are, and have been, an ongoing concern for villagers for many years. However, it is noted that the vision for the development is for small scale enterprises and not those requiring the use of Heavy Goods Vehicles, (HGVs). The potential increase in the number of smaller vehicle journeys through the village is to be preferred to those of HGVs. In order to accommodate any additional traffic, Clopton Parish Council would encourage all relevant parties to push for the Local Highways authority to work towards the introduction of a speed limit along the B1078 approaching Manor Road from the west and past Shop Road to the east.

Despite these concerns, the general feeling of residents and councillors is that current Clopton Commercial Park is a huge improvement on the previous situation at the site, both visually and in terms of the type of vehicular traffic, the whole site is very tidy and the range and reduced scale of individual business activities have decreased the HGV traffic to the site. The proposed new buildings are seen as unobtrusive in design and will perhaps balance out the aesthetics of the site as a whole.

There is hope that Clopton Commercial Park with the Café and Gym/Studio could help in some way to create a hub for Clopton in the future.

It is hoped that the employment that the proposed additional units would create will bring a variety of job potential to Clopton and surrounding village residents. Especially those who do not have their own transportation.

The consensus is that by allowing the proposed application to go through for small business types there will be less risk of HGV traffic increase to the site in future years.

The council voted on the application and the unanimous decision was that as long as our observations stated below are observed the application would be supported:

a) Use of this extension to Clopton Commercial Park is restricted to activities falling with use categories B1 and B2 only and specifically excludes type B8;

- b) The developer and local authorities to push for the Local Highways authority to work towards the introduction of a speed limit along the B1078 approaching Manor Road and past Shop Road;
- c) The developer should be encouraged to incorporate a number of business starter units;
- d) Regarding Clopton footpath number 5 which currently, crosses the site. The proposed revision to the route across the airfield, as outlined in the application, be formalised with East Suffolk Council and Suffolk County Council and the definitive map be duly updated accordingly;
- e) The developer be encouraged to enter into a dialogue with the operators of the local bus service to facilitate access to the park using local transport services and to improve the bus service to the park;
- f) That the developers be encouraged to consider the installation of electric vehicle charging points and PV solar panels;
- g) Where necessary, any potential contamination at the site is removed;
- h) Where necessary adequate sewage treatment facilities are provided;
- i) If required measures are taken to assess and manage any heritage assets on the site;
- j) Where necessary, a drainage strategy is approved and implemented before development proceeds.”

### Statutory consultees

Consultee	Date consulted	Date reply received
Environment Agency - Drainage	15 July 2021	No response
Summary of comments: No response received.		

Consultee	Date consulted	Date reply received
SCC Highways Department	15 July 2021	5 August 2021
Summary of comments: Notice is hereby given that the County Council as Highways Authority does not wish to restrict the grant of permission. Any necessary highways related conditions related to the reserved matters can be recommended at the reserved matters stage.		

Consultee	Date consulted	Date reply received
SCC Rights Of Way	15 July 2021	No response
Summary of comments: No response received.		

## Non statutory consultees

Consultee	Date consulted	Date reply received
SCC Arts Development Manager	15 July 2021	No response

Summary of comments:

No response received.

Consultee	Date consulted	Date reply received
SCC Fire And Rescue Service	15 July 2021	16 July 2021

Summary of comments:

Recommends a condition for fire hydrants, should consent be granted. Also provided informative information in respect of access to water supply and fire fighting facilities.

Consultee	Date consulted	Date reply received
East Suffolk Economic Development	15 July 2021	09 November 2021

Summary of comments:

The Economic Development team seeks to support those planning applications where the application clearly supports the economic growth and regeneration of the economy within East Suffolk. We seek to comment on non-residential floor space (increase/decrease), commercial demand, jobs (created, lost, or sustained) and strategic fit.

In response, the East Suffolk Economic Growth Plan prioritises the need to support entrepreneurs and entrepreneurship and encourage established businesses to invest and grow. To deliver these priorities and ensure a diverse economy, East Suffolk requires a diverse mix of high quality, and affordable commercial premises, particularly, B2, B8, and E(g), that reflect demand, are appropriate to the type of business, and their stage within the business life cycle.

The Economic Development team welcomes the investment already made by the applicant in upgrading the quality of the existing buildings at Clopton Commercial Park, and the progress made in creating a 'vibrant and enterprising community'.

Continued investment in the employment site, is welcome and reflects an identified demand from business. However, the Economic Development team are keen to flag the requirement to ensure a continued mix of diverse employment space across the district, particularly that which is suited to engineering and production activities within existing employment sites.

In conclusion, the Economic Development team is supportive of application DC/21/3303/OUT which aligns with strategic ambitions for economic growth in East Suffolk.

Consultee	Date consulted	Date reply received
East Suffolk Ecology	15 July 2021	5 August 2021
Summary of comments: No objection raised, comments incorporated into officers report.		

Consultee	Date consulted	Date reply received
East Suffolk Environmental Protection	15 July 2021	21 July 2021
Summary of comments: No objection in principle, comments incorporated into officers report.		

Consultee	Date consulted	Date reply received
East Suffolk Landscape Team	15 July 2021	6 August 2021
Summary of comments: No objection, comments incorporated into officers report.		

Consultee	Date consulted	Date reply received
East Suffolk Planning Policy	15 July 2021	13 August 2021
Summary of comments: Comments received and incorporated into officers report.		

Consultee	Date consulted	Date reply received
Police - General	15 July 2021	No response
Summary of comments: No response received.		

Consultee	Date consulted	Date reply received
Sustrans (East Of England)	15 July 2021	No response
Summary of comments: No response received.		

Consultee	Date consulted	Date reply received
Suffolk Wildlife Trust	15 July 2021	No response

Summary of comments:  
No response received.

Consultee	Date consulted	Date reply received
Disability Forum	15 July 2021	16 August 2021

Summary of comments:

We note that parking spaces for Blue Badge Holders are included at various locations throughout the site. We welcome the Design & Access Statement where it states “provision for people with disabilities..... within the units designed to requirements of Approved Document M to the Building Regulations”. We anticipate that all units will have level access and be fully accessible to wheelchair users. There are units that are two-storey but no indication as to whether there will be lift access from the ground floor to the upper floor.

## Publicity

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

Category	Published	Expiry	Publication
Archaeological Site	22 July 2021	12 August 2021	East Anglian Daily Times

## Site notices

General Site Notice

Reason for site notice:  
May Affect Archaeological Site  
In the Vicinity of Public Right of Way  
Contrary to Development Plan  
Date posted: 28 July 2021  
Expiry date: 18 August 2021

## 5. Planning policy

National Planning Policy Framework 2021

SCLP3.1 - Strategy for Growth (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP3.2 - Settlement Hierarchy (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP3.3 - Settlement Boundaries (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP4.1 - Existing Employment Areas (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP4.2 - New Employment Development (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP4.3 - Expansion and Intensification of Employment Sites (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP4.5 - Economic Development in Rural Areas (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP4.8 - New Retail and Commercial Leisure Development (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP7.1 - Sustainable Transport (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP7.2 - Parking Proposals and Standards (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP9.2 - Sustainable Construction (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP9.6 - Sustainable Drainage Systems (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP9.7 - Holistic Water Management (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP10.4 - Landscape Character (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP11.1 - Design Quality (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP12.34 - Strategy for the Rural Areas (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP12.35 - Former airfield Debach (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

## **6. Planning considerations**

### Principle of Development:

- 6.1. The former Debach airfield employment allocation was carried forwards from the Site Allocations and Area Specific Policies Development Plan Document (January 2017), which was superseded by the new Local Plan, covering the former Suffolk Coastal Area with policy SCLP12.35. Land at the former airfield Debach encompasses 10.89ha, development of which is expected to provide B1, B2 and B8 employment uses. The allocation notes that the developed area is long and narrow with limited scope for extension or

intensification within it. This application site lies outside of that allocation and is within the Countryside.

- 6.2. Since the adoption of the Local Plan in September 2020, the Town and Country Planning (Use Classes) Order has also been updated, replacing class B1 with class E which covers revoked use classes A1/2/3, B1, D1(a-b) and indoor sport from D2(e); albeit part (g) (i-iii) inclusive are the direct replacements for B1 (a-c) uses. For the purposes of this report, any reference to B1 uses cited from the Local Plan Policies have been considered under the new Class E.
- 6.3. As noted above, the employment uses in the adjacent allocation are split between two ownerships, Debach Enterprises and Clopton Business Park. The two areas contain a mix of lawful uses in Use Classes E (formally B1), B2 and B8. In order to enable the site to continue to accommodate churn of tenants over the plan period, the site owners have identified the need for limited flexibility to enable existing built units to be re-furnished or replaced to provide an appropriate gap between them. Under SCLP12.35, within the allocation area, planning permission will be granted for new employment provision, through re-development or refurbishment of existing buildings or any other change of use proposal that would result in an increased level of activity within the site provided that:
  - a) The use is restricted to activities falling within Use Classes B1, B2 and B8;
  - b) Where necessary, a transport statement or transport assessment can demonstrate to the satisfaction of the Highway Authority that the scale and type of traffic generated is acceptable in terms of impact on the local road network;
  - c) Where necessary, investigation of potential contamination at the site has been undertaken prior to submission of any relevant planning application;
  - d) Where necessary, adequate sewage treatment facilities are provided;
  - e) If required measures have been taken to assess and manage any heritage assets on the site;
  - f) A site-specific Flood Risk Assessment is provided for proposals greater than 1ha; and
  - g) Where necessary, a drainage strategy is approved and implemented before development proceeds.
- 6.4. As outlined above, the application site lies outside of the former Debach airfield as outlined by Policy SCLP12.35 and therefore is considered to be in the countryside for planning purposes. Policy SCLP3.3 states that new employment outside of settlement boundaries will not be permitted unless specific policies state otherwise. SCLP12.35 provides no material policy influence on the determination of this application.
- 6.5. Policies SCLP4.2, SCLP4.3 and SCLP4.5 all provide criteria for new employment development relevant to this application. Policy SCLP4.2 provides general support for new employment uses in suitably located areas and introduces a sequential approach to locating employment development. The policy states:

"Proposals for new employment development falling within use classes B1,B2 and B8 outside of existing Employment Areas but within Settlement Boundaries will be supported where these do not have an unacceptable adverse impact on the

surrounding land use, living conditions of local residents and local highway network.

Proposals for new employment development falling within use classes B1, B2 and B8 on land outside of Settlement Boundaries will be permitted where a need for additional employment development has been demonstrated or it can be demonstrated that there is no sequentially preferable land available adjacent to existing Employment Areas, within existing Employment Areas or within Settlement Boundaries and:

a) It would not have an unacceptable adverse impact on surrounding land use; and  
b) It avoids, or adequately mitigates, any adverse impact on the character of the surrounding area and landscape, the AONB and its setting or the natural or historic environment."

- 6.6. Whilst the supporting text of the submission gives some context of the current uses and intentions for expansion of the site, it does not appear that the site is currently being optimised or that there is an issue with capacity of land inside the allocation before development into the countryside is a consideration. Justification for the expansion should illustrate why the expansion of this site is needed over opportunities available within the allocated area.
- 6.7. If any of the existing businesses were seeking intensification or expansion, then policy SCLP4.3 would be applicable. That is not the case in this application as it has not been proposed as an expansion for an existing business. The proposed development appears to be speculative within no established future occupiers.
- 6.8. Where the expansion or intensification of existing premises falling within use classes B1, B2 and B8 cannot reasonably take place within existing Employment Areas, development will be permitted on adjacent land outside of Settlement Boundaries providing it does not have an unacceptable impact on surrounding land uses. SCLP54.3 therefore provides the criteria to expand an existing employment area, however the policy aims at expanding employment areas where the requirement is driven by existing premises. From the submitted application it appears that the expansion is led by new businesses coming into the area as opposed to a need to expand the existing premises. Certainly, the range of alternative uses proposed would support the assumption that these are new businesses not a required need driven by a requirement to expand from existing businesses on the site or in the immediate area
- 6.9. In considering this as a speculative employment development opportunity consideration must be given to the more strategic position on employment land and development in the area. Whilst employment does bring economic benefits and job creation, unnecessary unplanned employment development which is not led by a recognised need can be harmful to wider economic growth in the area and the viability of planned employment sites. That includes in this case, the immediately adjacent allocated employment site and its own opportunities for more efficient expansion and beneficial redevelopment. Since acquiring the site, the applicant has sought to create smaller business units within existing units to meet a demand for smaller businesses, however the applicant has not presented as case on why employment expansion proposed in this unplanned site cannot be accommodated within the allocated area or as part of extant consents on that site.

- 6.10. Furthermore, the wider area does benefit from a wide range of employment and business expansion opportunities which are already either consented or allocated. A number of those planned sites are dependent in their delivery in being attractive to future occupiers and by their nature, employment consents only tend to get built out as occupiers of those sites come forward. These sites include:

Employment Allocations within the Local Plan or Neighbourhood Plans

- BDP.9 Bredfield Neighbourhood Plan: Expansion of Business Premises (*approx. 3.1miles from the application site*).  
Provides an area of 0.48ha for the relocation of existing businesses and opportunities for new enterprises.
- SCLP12.41 – Riverside Industrial Estate, Wickham Market (*approx. 4.9miles from the application site*)  
Comprises an area of 2.04ha with permission for a mix of B1 and B2 uses.
- FRAM20 Framlingham Neighbourhood Plan: Land to the west of New Street (*approx. 8.2 miles from application site*)  
Provides an area of approximately 2.8ha for proposals within B1 employment uses.
- FRAM27 Framlingham Neighbourhood Plan: Land off Woodbridge Road (*approx. 7.3 miles from application site*)  
Provides an area of approximately 3.7ha for Class B employment development.
- MAR19 Martlesham Neighbourhood Plan: Sandy Lane, Martlesham (*approx. 6.8miles from application site*)  
Redevelopment or refurbishment of existing buildings will be permitted for B1 or B2 use classes.
- MEL20 Melton Neighbourhood Plan: Land of Wilford Bridge Road (*approx. 5.5miles from application site*)  
Provides an area of 9.7ha for mixed use development including at least 9, 000m2 of B1 floorspace and ancillary retail to support B-class commercial development.

Consented employment schemes

- DC/13/3229/OUT – Hillview, Church Road, Otley (*approx. 3miles from application site*)  
Provides at least 900m2 of B1 commercial space. In this case the developer has recently attempted to remove the employment element, suggesting that it is not viable. The application to remove the employment was refused and this remains an important site to deliver new employment.
- DC/18/3850/OUT – Old Station Works, Westerfield Road, Westerfield (*varied by DC/20/1712*) (*approx. 7.3miles from application site*)  
Mixed use development including approximately 1,285m2 of commercial floorspace (16 units of B1 which will be flexible B1/D1 use and 1 unit of class A1). The approved phasing plan requires the commercial element to be built before the housing.

- DC/21/2100/VOC- Yew tree Courtyard, Framlingham Road, Earl Soham (*approx. 8miles from application site*)  
Erection of a new building comprised of six smaller units for Class E(g) (formerly B1) and associated B8 storage uses. This application follows other approvals for new employment development on the wider site initially granted for employment uses by DC/15/2705/OUT. This site has its infrastructure in place and some units have been built whilst others remain undeveloped.
- DC/21/1712/OUT - Newnham Business Park, Saxtead Road, Framlingham (*pending decision*) (*approx. 8.2miles from application site – referenced in Framlingham Neighbourhood Plan: FRAM20*)  
A phased employment area for office, studio, workshop and light industrial and storage units comprising B1, B2 and B8 use classes (previously approved ref. DC/16/4370/OUT). This site has commenced in the delivery of its drainage infrastructure and a current application seeks to establish a mix of full and outline consent for the site.

- 6.11. Policy SCLP4.5 also provides a specific criterion for new employment development within the countryside. The policy is aimed at diversifying and growing the rural economy with particular emphasis on securing local employment, agricultural growth and diversification and other land based rural businesses. This site is adjacent an employment area formed of (superseded) B1, B2 and B8 use classes and represents a significant area of development which is not rural in character. This policy is a consideration, but it is not considered that the proposal meets its overall aims.
- 6.12. Policies SCLP4.2 and SCLP4.3 both provide a criteria for permitted employment uses, however the proposal seeks to provide a number of uses outside class B1 (superseded), B2 and B8 including a nursery, gym and cafe. The application shows E class uses are proposed which the application suggests will be ancillary to the overall employment allocation. However, care must be taken to ensure that a retail/commercial park is not created in an inappropriate location. It is not clear how the uses can remain ancillary and how these services won't be used by the wider public.
- 6.13. Policy SCLP4.8 sets out a sequential approach to new town centre appropriate uses seeking to locate them first and foremost in town centre area, before considering edge of centre and then out of centre sites. The sequential test and relevant out-of-centre criteria should be considered in a location such as this, however no sequential test has been provided which demonstrates that this is the optimum site for the proposed non-Class E, B2 or B8 uses, or whether these are required to all be provided together in one location. Furthermore, policy SCLP4.2 states where office uses are proposed outside town centres (other than for small rural offices in accordance with other policies) a sequential approach should be taken to ensure there isn't suitable spaces in more sustainable locations.
- 6.14. East Suffolk Council's Economic Development Team have written in support of the proposed development. This is because the additional units would accord with the generic strategic ambitions for economic growth within East Suffolk. However, the response does not acknowledge any alternative sites which are already consented or are allocated for employment development within their response and does not address the conflict with the adopted policies within the local plan which identifies suitable

employment sites. It is not necessary for the Economic Development Team to consider policy compliance, only the economic merits of the proposal.

- 6.15. There are a number of sites within 10 miles of the application site which are either consented or allocated for similar employment uses, a number of examples of these are identified above. Whilst the Council generally seeks to support new employment uses, in this instance there has been no demonstration or submission of evidence (sequential test) that the other consented/allocated sites are unsuitable or unavailable for the proposed development. In permitting the proposed development, outside of any allocated employment site or allocation without this evidence could negatively impact the potential for allocated/consented sites for employment being subsequently built out and occupied, as the wider demand is likely to be reduced as businesses seeking space could occupy the units on this unallocated and unplanned for development, and thus no longer look to/need to occupy units on allocated and previously consented sites.
- 6.16. Equally, whilst the support from Clopton Parish Council is noted, it raises a number of criteria which the development is expected to meet for the support to be obtained. These include a restriction to B1 (superseded), B2 and B8 uses, to reflect those of the adjacent employment site; changes to the speed restrictions on the B1078; facilitating access to the park using local transport services and improving the existing bus service.
- 6.17. It should also be noted that whilst it is recognised that the development occurs outside the boundaries of allocation SCLP12.35 it is the allocation which is restricted to employment uses only. However, the other uses are equally not considered appropriate forms of development within the countryside and would not accord with the aforementioned policies, without any sequential test which identifies that the site is the most appropriate location for the proposed uses. For these reasons it is not considered that the development would accord with SCLP3.2, SCLP3.3, SCLP4.2, SCLP4.3 or SCLP4.5; therefore, the principle of development has not been established.

Visual and Landscape Impact:

- 6.18. Landscaping, scale and appearance is not subject to consideration as part of this application. However, the submitted statement has acknowledged the existing forms of development on the adjacent site, as well as how the new buildings would relate. The proposed buildings are indicated to be lower in scale than the adjacent large sheds, but would follow a relatively simple linear format. The statement also notes the intention to develop a character theme for the new buildings which will be consistently applied with new buildings which will be consistently applied with uniform gable widths and roof pitches, a consistency of materials and fenestration patterns. Wall materials will be dark stained timber weatherboard finish, with profiled metal roof finishes and large paned grey/black window frames to create a unified visual character to the development.
- 6.19. In respect of landscape impact, in accordance with the previous withdrawn scheme, the Council's Landscape Manager has not raised any objection, as the proposal is unlikely to result in adverse impact on local landscape character. There is an intention to retain the hedge and trees between the site and the existing commercial buildings. As and when any detailed application comes forward, this will need to be accompanied by a tree survey and arboricultural impact assessment in order to understand any likely potential

impacts that may arise from the intended site layout on the rooting areas of the trees and hedge. There should also be an indicative landscape masterplan with intended planting strategy. With these matters fully and adequately addressed at reserved matters planning stage, there are no foreseen grounds for objection of adverse landscape and arboricultural impact.

Ecology:

- 6.20. The Council's Ecologist has reviewed the Preliminary Ecological Appraisal (PEA) (Adonis Ecology, June 2021) and is satisfied with the conclusions of the consultant. Should permission be granted, a number of conditions have been recommended. There is therefore no policy conflict with SCLP10.1.

Heritage and Archaeology:

- 6.21. The application site is currently a level grassed area and contains no structures or other above ground artefacts. When the airfield was operational this was a grassed area between the main runway and the airfield's Technical Site. Previously the land was in agricultural use and crossed by a field boundary with the extant footpath alongside. The field boundary was grubbed out as part of the construction of the airfield in 1943-44. There are no designated heritage assets within 500m of the site. The site may however be of archaeological interest and any grant of planning would include conditions for archaeological investigation to occur prior to any development of the site.

Highways and Public Right of Way:

- 6.22. It should be recognised that the sustainability of this site is poor. It has no footway connections to residential areas and nearby residential areas are small and very rural. There are no cycling infrastructure connections to the site. Whilst a bus stop is indicated to be at the entrance to the site, this appears to be for the no.70 village links bus which runs from Woodbridge to Ipswich and vice versa and does not identify Clopton Business Park as a formal stop on its timetable: the only formally identified stop in Clopton is at Clopton Green on the B1078 opposite Shop Corner. Users and employees of this site would almost totally be reliant on reaching the site by car. It is acknowledged that this already remains the case for the existing businesses on the site and for any new businesses within the allocated area, however this proposal substantially increases the amount of employment on the site.
- 6.23. In contrast the majority of the sites listed in paragraph 6.10. which are allocated or have planning permission are in much more sustainable locations where employees could reach the site by bus, rail, walking or cycling from nearby residential areas. This is not a coincidence, it is as a result of those site having been planned, through the Local Plan or Neighbourhood Plans and through considered past planning applications. They are located in sustainable locations for a reason, importantly to ensure that reliance on private motor vehicles is reduced, therefore ensuring the carbon emissions of development are reduced and the impact on the environment and global warming is less.
- 6.24. Chapter 9 of the NPPF outlines that new development should promote sustainable transport, noting that "significant development should be focused in locations which are or can be made sustainable, through limiting the need to travel and offering a genuine

choice of transport modes” (para 105). The site is in a rural location where access to more sustainable transport modes are limited, however the applicant has not identified any opportunities to promote sustainable transport to the site. Paragraph 85 of the NPPF acknowledges this view, noting that in rural areas sites may be found outside of existing settlements which are not well served by public transport, however states that the resulting development should exploit any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport).

- 6.25. This site is unsustainable and therefore development beyond that accepted by policy, for the reason of it being brownfield land on a former airfield runway is not justified. Expansion of this site is not justified, and no attempts have been made in the application to suggest how the unsustainable location could be mitigated in anyway, although this is unlikely to be possible in such a rural area. For these reasons the development is considered to be contrary to paragraphs 85 and 105 of the NPPF and Local Plan Policy SCLP4.5.
- 6.26. Whilst Suffolk County Council as Highways Authority does not wish to restrict the grant of permission, it is important to recognise that the Highway Authority are not responsible for determining the sustainability of the site or its policy compliance in terms of all forms of access. In this case their consideration is limited to the design of any access and the suitability of vehicular routes to the site. As such they have not raised any concern or objection to the intensification of use of the access or highlighted any adverse impacts to the surrounding highways network. Any necessary highways related conditions related to the reserved matters can be recommended at a reserved matters stage.
- 6.27. As noted above, public right of way Fp5 runs through the application site. The applicants have submitted drawing 4472-006-P01 which indicates a possible diversion route, as the existing route would run along the hedge boundary of the site, then across the site south of the indicated location of the 'studio'. The diversion would instead follow the existing highway access around the parameter of the site, re-joining the current route just before crossing the most western highway.
- 6.28. Suffolk County Council Public Rights of Way have been consulted on the application; however no comments have been received on the acceptability of the proposed diversion. The granting of planning permission is separate to any consents which may be required in respect of public rights of way and would not therefore give authorisation for structures such as gates to be erected on a public right of way, or the temporary or permanent closure or diversion of a public right of way. The diversion of the public right of way would require the making of an order under section 257 of the Town and Country Planning Act 1990, which has not been entered into.

#### Residential Amenity & Noise:

- 6.29. Due to the distance from residential properties, the development is not considered to cause adverse impact to residential amenity (SCLP11.2). The Council's Environmental Protection team have not raised any objection in principle to the development, however the application does not include any information in respect of noise which may be generated by future users of the site; predominately as these have not yet been defined. Noise from fixed plant or machinery (e.g. heat pumps, compressors, extractor systems,

fans, pumps, air conditioning plant or refrigeration plant) can be annoying and disruptive. This is particularly the case when noise is impulsive or has tonal characteristics. As future occupation is not yet known, it would be useful to include a condition for a noise assessment to be submitted prior to occupation of each building, dependent upon what plant is proposed and also the intended use, however this is considered to be more applicable to be applied to any subsequent reserved matters where more information about the buildings, layout, uses and potential occupiers would be known.

#### Environmental Impact Assessment:

- 6.30. The proposed development falls under Schedule 2, Section 10(a) of the EIA Regulations and exceeds the thresholds in column 2 as the site is over 0.5 hectares in size and proposes an industrial estate development project. The LPA must therefore consider whether the proposed development is likely to have significant effects on the environment. This screening opinion considers those effects having regard to the selection criteria in Schedule 3 of the EIA Regulations. It is concluded that the proposed development is not considered to result in likely significant effects on the environment and therefore an Environmental Statement is not required.

### **7. Conclusion**

- 7.1. This application seeks Outline Planning Permission (with only access to be considered) for the extension to Clopton Commercial Park, Debach Airfield, Clopton with erection of one and two-storey business units and studio/gym/creche. The site lies in the countryside, where policy SCLP3.3 states that new employment outside of settlement boundaries will not be permitted unless specific policies state otherwise. The development is not considered to accord with any of the policies within the Local Plan which would support new commercial or employment development in the countryside. Additionally, no sequential test has been submitted to confirm that the proposed uses could not otherwise be located within a more sustainable location. Therefore, the development would be contrary to SCLP3.2, SCLP3.3, SCLP4.2, SCLP4.3 or SCLP4.5; the principle of development has not been established.

### **8. Recommendation**

- 8.1. Refuse Planning Permission.

The reasons for the decision to refuse permission are:

1. This application seeks Outline Planning Permission (with only access to be considered) for the extension to Clopton Commercial Park, Debach Airfield, Clopton with erection of one and two-storey business units and studio/gym/creche. The site lies in the countryside, where policy SCLP3.3 states that new employment outside of settlement boundaries will not be permitted unless specific policies state otherwise. The development is not considered to accord with any of the policies within the Local Plan which would support new commercial or employment development in the countryside. Additionally, no sequential test has been submitted to confirm that the proposed uses could not otherwise be located within a more sustainable location. Therefore, the development would be contrary to SCLP3.2, SCLP3.3, SCLP4.2, SCLP4.3 or SCLP4.5; the principle of development has not been established.

2. The site has poor sustainability; it is remote from residential areas has no footway or cycle connections to any nearby, which are small and very rural. There is an informal bus stop at the entrance of the site, which provides limited transport links to/from Woodbridge and Ipswich. Users and employees of this site would therefore predominantly be reliant on reaching the site by car. The NPPF outlines that new development should promote sustainable transport, noting that “significant development should be focused in locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes” (para 105). Paragraph 85 further states that new development should exploit 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 proposed development does not demonstrate how the unsustainable location could be mitigated in any way to reduce travel by car, although this is unlikely to be possible in such a rural area. For these reasons the development is considered to be contrary to paragraphs 85 and 105 of the NPPF and Local Plan Policy SCLP4.5.

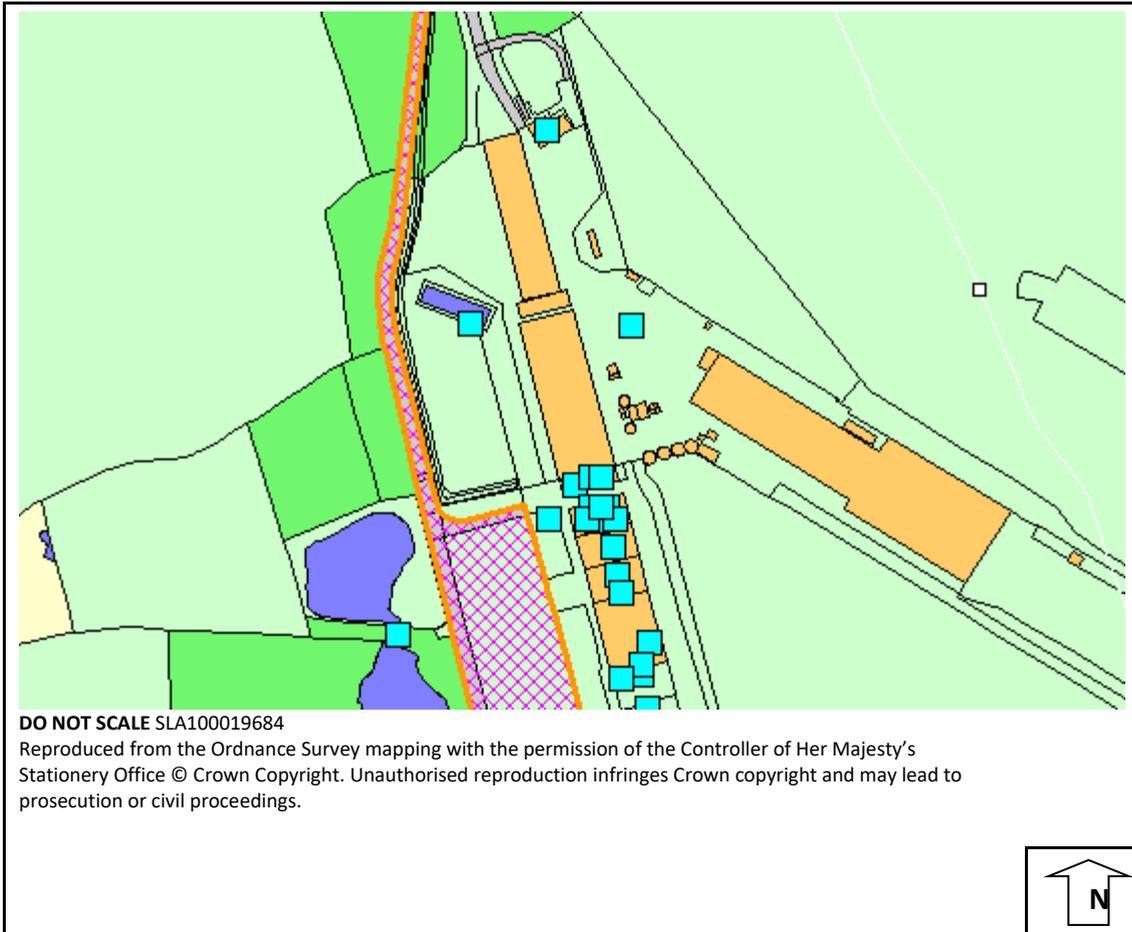
**Informatives:**

1. The Council offers a pre-application advice service to discuss development proposals and ensure that planning applications have the best chance of being approved. The applicant did not take advantage of this service. The local planning authority has identified matters of concern with the proposal and the report clearly sets out why the development fails to comply with the adopted development plan. The report also explains why the proposal is contrary to the objectives of the National Planning Policy Framework and local plan to deliver sustainable development.

**Background information**

See application reference DC/21/3303/OUT on [Public Access](#)

## Map



## Key



Notified, no comments received



Objection



Representation



Support