

Committee Report

Item 7B

Reference: DC/21/01735

Case Officer: Jasmine Whyard

Ward: Fressingfield.

Ward Member/s: Cllr Lavinia Hadingham

RECOMMENDATION – GRANT PLANNING PERMISSION WITH CONDITIONS

Description of Development

Planning Application. Change of use of part of land for siting up to 12 glamping pods and up to 6 mobile homes. Retention of conversion of part of the farm building to create educational baking facility

Location

Wakelyns Farm, Metfield Lane, Fressingfield, Eye Suffolk IP21 5SD

Expiry Date: 20/08/2021

Application Type: FUL - Full Planning Application

Development Type: Major Small Scale - All Other

Applicant: Wakelyns

Agent: Mr D Houchell

Parish: Fressingfield

Site Area: 8.61 hectares

Details of Previous Committee / Resolutions and any member site visit: None

Has a Committee Call In request been received from a Council Member (Appendix 1): No

Has the application been subject to Pre-Application Advice: Yes

PART ONE – REASON FOR REFERENCE TO COMMITTEE

The application is referred to committee for the following reason/s:

- i) The Chief Planning Officer considers the application to be of a controversial nature having regard to the planning reasoning and the extent and planning substance of comments received from third parties.
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PART TWO – POLICIES AND CONSULTATION SUMMARY

Summary of Policies

The Development Plan

The following policies are considered the most important to the determination of this proposal. The policies are all contained within the adopted development plan for Mid Suffolk District which for the purposes of determining this application is comprised of: Mid Suffolk Core Strategy Focused Review (2012), Mid Suffolk Core Strategy (2008), Mid Suffolk Local Plan (1998), specifically the live list of 'saved policies' (2016). All policies, save for CS1 and CS2, are afforded full weight in the determination process as they are considered wholly consistent with the aims of the NPPF under paragraph 219 of that document. This will be explained further, later in this report.

Core Strategy Focused Review 2012:

FC1 - Presumption in Favour of Sustainable Development

FC1.1 - Mid Suffolk Approach to Delivering Sustainable Development

Core Strategy 2008:

CS1- Settlement Hierarchy

CS2 - Development in the Countryside & Countryside Villages

CS4- Adapting to Climate Change

CS5 - Mid Suffolk's Environment

Local Plan 1998:

GP1- Design and Layout of Development

HB1 - Protection of Historic Buildings

CL8- Protecting Wildlife Habitats

CL17 - Principles for Farm Diversification

CL18- Change of Use of Agricultural and Other Rural Buildings to Non-Residential Uses

H10- Dwellings for Key Agricultural Workers

H11- Residential Caravans and Other Mobile Homes

H16- Protecting Existing Residential Amenity

T9 - Parking Standards

T10 - Highway Considerations in Development

H17- Keeping Residential Development Away From Pollution

Fressingfield Neighbourhood Plan 2020:

FRES 1- Housing Provision

FRES 6- Landscape character

FRES 10- Design

FRES 13- New and existing businesses

FRES 15- Transport and highway safety

Emerging Joint Local Plan Policies

The emerging Joint Local Plan is currently at Regulation 22 (examination stage). As this examination has not yet been completed, the plan currently has limited weight in the decision-making process. However, it is noteworthy that the application site continues to be located within the countryside, where emerging policy LP22 (Change in Land Use for Equestrian or Other Animal/ Rural Land base Uses) would be engaged which seeks to build upon adopted Local Plan policy CL17 and continues to support the principle of farm diversification amongst other countryside uses.

The National Planning Policy Framework

The National Planning Policy Framework (NPPF) 2021 contains the Government's planning policies for England and sets out how these are expected to be applied. Planning law continues to require that applications for planning permission are determined in accordance with the development plan unless material considerations indicate otherwise. The policies contained within the NPPF are a material consideration and should be taken into account for decision-taking purposes.

Consultations and Representations

During the course of the application consultation and representations from third parties have been received. These are summarised below.

A: Summary of Consultations

Town/Parish Council (Appendix 3)

Metfield Parish Council

Object on the basis of 1- impact on character of area, 2- detrimentally affect amenity of residents, 3- unacceptable increase in traffic, 4- pods and mobile homes being available for year-round use, 5- large numbers of people on site, 6- unclear why 6 mobile homes are required, 7- concern that mobile homes may be permanently occupied, 8- change of use of farmhouse to holiday let not included in application, 9- pods and caravans are unsightly, 10- insufficient parking on site as it's not shown on plans, 11- no waste storage provision, 12- no site manager, 13- hazard from fire bowls provided for each pod, 14- bringing in specialists from outside and not locally, 15- other accommodation such as B&Bs are located locally that could provide accommodation for visitors instead, 16- noise and disturbance to nearby dwellings, 17- inadequate infrastructure to support number of units including toilet facilities, 17- no disabled access considerations, 18- overdevelopment, 19- no local benefit and 20- retrospective

They would likely accept a smaller scheme and do not oppose the continued use of the farm for research, environmental sustainability, progressive farming methods, educational facility, bakery, day events and craft courses. Occupation restrictions should be applied to glamping pods and caravans.

Mendham Parish Council

Currently object to the proposal on the basis of 1- traffic generation along poor access roads, 2- incompatible with ecological stability and sustainability, 3- pods are innovative but unnecessarily intrusive into the farm landscape and 4- mobile homes must be of a considerable size. A smaller scheme may be supported.

Fressingfield Parish Council

Supports the application as it could make a positive contribution to the local economy. Would like greater clarification on whether these units are for seasonal workers or holiday lets. The council recognises that an increase in traffic on this single-track road will need careful management.

National Consultee (Appendix 4)

Historic England

No comments.

Environment Agency

No objection.

Natural England

No comments.

British Horse Society

No objection, but public right of way nearby should be retained.

County Council Responses (Appendix 5)

Highways

No objection, subject to conditions.

Travel Plan Officer

No comment as the application does not meet travel plan thresholds.

Flood and Water

Recommend approval.

Fire and Rescue

No objection subject to the development according with building regulations.

Internal Consultee Responses (Appendix 6)

Place Services- Ecology

No objection subject to conditions.

Place Services- Landscape

No objection in principle but require further information on landscaping schemes as there could be a potential landscape impact and note that they would prefer mobile homes to be located close to existing development, that there may be a visual impact from parked cars and the glamping pods should be in keeping with the local vernacular.

***Officer response:** the mobile homes are proposed to be sited on land which is fully enclosed and is covered by an overgrown meadow and is not used functionally for agriculture. Siting them closer to existing built form would potentially increase the visual impact on the designated heritage asset. The number of cars on site is not anticipated to be significantly increased from existing, moreover these are a temporary feature in the landscape and would be primarily sited on existing hardstanding areas.*

Heritage

Support the proposals for farm diversification, specifically the reuse of a redundant building as a bakery. However, note concerns that the glamping pods and mobile homes could be located as close as possible to the listed building which should be avoided. Also raise concerns that there is no evidence of need for

additional accommodation. There would likely be an above low level of less than substantial harm to the setting of the listed building arising from the siting of the glamping pods and mobile homes.

Environmental Health – Noise/Odour/Light/Smoke

No objection.

Environmental Health – Sustainability

No objection.

Environmental Health – Air Quality

No objection.

Environmental Health- Land Contamination

No objection.

Licensing

Minimum of 6 metre spacing between mobile homes and raise potential concerns about insulation.

B: Representations

At the time of writing this report at least 100 letters/emails/online comments have been received. It is the officer opinion that this represents 50 objections and 47 supporting submissions. Some comments are neutral. A verbal update shall be provided as necessary.

Grounds of objection are summarised as follows:

Increased traffic, highway safety given road network

Development already begun

Noise pollution

Inadequate on-site parking

Health and safety

Precedent setting

No business model

Security

Landscape character

Foul water management

Wildlife impact

Infrastructure impact

Poor quality accommodation

Light pollution

(Note: All individual representations are counted and considered. Repeated and/or additional communication from a single individual will be counted as one representation.)

PLANNING HISTORY

REF: DC/20/01044

Application for Listed Building Consent-
Alterations to ground floor bathroom.
Conversion of first floor cupboard to
bathroom including new door opening. New
first floor shower room. New internal soil
vent pipes in access ducts. New extraction
fans to new bathroom/shower rooms.

DECISION: GTD
07.08.2020

REF: 0093/04/LB	INSTALLATION OF SOLAR WATER HEATING COLLECTORS TO SOUTH WEST ROOF SLOPE OF HOUSE TO PROVIDE UP TO 40% OF ENERGY NEEDS. USE EXISTING INTERIOR PIPES.	DECISION: REF 06.08.2004
REF: 1465/04/	ERECTION OF FARMYARD BUILDING FOR ADMIN & SEED PREPARATION. SINGLE STOREY TIMBER FRAMED & CLAD.	DECISION: GTD 12.01.2005

PART THREE – ASSESSMENT OF APPLICATION

1. The Site and Surroundings

- 1.1. The site is located at the northern end of Metfield Lane (a single-track lane with passing places) which ends at Wakelyns, a farm operating using agroforestry. Metfield Lane serves five other properties. The site sits within the countryside outside of any built-up area boundary. Fressingfield is located 2.4 miles (by road) south west of the site, Metfield is located 2.6 miles north east and Mendham is located 3.8 miles north.
- 1.2. There are two ponds on site and several unlisted ancillary agricultural buildings with the principal dwelling (Wakelyns Farmhouse) being Grade II listed. The unlisted outbuildings comprise of implement building, former pig building, tool shed, barn, former cow shed and an administration/seed and training building. There is also a 10 kW solar PV array, ground source heating and biomass boiler on site (fuelled by hazel and willow from the site). The main agroforestry operations are located north and west of the dwelling and outbuildings, there are two parcels of land located east which comprise underutilised agricultural land. There is extensive, heavy and mature vegetation screening the entirety of the site's perimeter enclosing it from adjacent fields and the wider open countryside. The nearest dwelling is located 355 metres south west of the application site.
- 1.3. The application site extends 8.61 hectares, but the total farm and land ownership extends 23 hectares and comprises one of the oldest organic agroforestry farms in the UK, established in the 1990s. There are 56 tree lines, separated by varying distances ranging between 12m, 15m and 18m, which creates the main agroforestry format of the operations. There are a vast array of tree species, including walnut, plum, pear, quince, apple, cherry, peaches, apricots, medlars and hazels to name but a few. The land is also subject to organic rotation agroforestry, with crops including lentils, chia, camelina and YQ 'population wheat'.
- 1.4. There is a Public Right of Way (footpath) running around the boundary of the site south and east. The site is wholly in Flood Zone 1 and is therefore at a low risk of fluvial flooding and is also at a low risk of pluvial flooding. The site does not fall within any designated landscape area (Special Landscape Area or Area of Outstanding Natural Beauty).

2. The Proposal

- 2.1. The application proposes the siting of twelve glamping pods and six static mobile homes on land and the retention of conversion works to the former pig building to form a bakery also functioning as an educational facility. Attached to the former pig building is an open storage building with four bays, which is also proposed to be enclosed by metal shutter doors.
- 2.2. The glamping pods will be mobile, moving around in conjunction with the rotational crops, all located between the tree lines. The pods measure 3.6m x 2.4m x 3m (height) and incorporate mono-pitched roofs. The pods will be occupied by short-term visitors to the site, specifically to visit the farming operations and environment, with some attending agriculture/horticulture related courses run during the summer months and actively participating in activities on site. Many of these visitors already attend on a daily basis, including on consecutive days on the basis that there is no short-term accommodation available on site.
- 2.3. The mobile homes would measure 10.6m x 3m x 3m (height). The six mobile homes will provide rural workers who operate their own small scale rural enterprises on site and work on the land at Wakelyns with accommodation. The mobile homes will not be permanently fixed to the ground, connected only by services. The mobile homes will primarily be stationed east of the farmhouse, within the screened meadow, with one home sited to the western corner of the site.

3. Principle of Development

- 3.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 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, then that determination must be made in accordance with the plan unless material considerations indicate otherwise. A key material consideration regarding the principle of development is the National Planning Policy Framework (NPPF) 2021.
- 3.2. Policy CS1 identifies a settlement hierarchy to steer development towards the most sustainable locations. To this end, nearby Fressingfield is designated as a Primary Village and Metfield and Mendham are both Secondary Villages. CS1 restricts development outside of settlement boundaries to certain types of development which are considered compatible with protecting and supporting the countryside. Policy CS2 works in conjunction with policy CS1 to identify types of development which are considered appropriate within the countryside, which includes forms of farm diversification and rural workers accommodation. FRES 1 works alongside CS1 to direct residential development (such as mobile homes) to the settlement boundary, outside of this boundary development is only permitted where it accords with paragraph 80 of the NPPF or there is a local need. Paragraph 80 of the NPPF supports residential development within the countryside where it is for an agricultural worker as in this instance.
- 3.3. Whilst policies H10 and H11 are not wholly relevant to the determination of the proposal, aspects of both policies are relevant in assessing the mobile homes and provide a useful starting point in determining the acceptability of the proposal. Policy H10 enables the provision of rural workers dwellings where there is a proven essential and immediate need. Whilst caravans are not considered dwellings for the purposes of planning, policy H10 nonetheless requires the need to be demonstrated for the provision of accommodation on site for rural workers. Policy H11 specifically relates to residential caravans and seeks to steer them towards sustainable locations. The proposal is strictly in conflict with this policy given the site's remote location, however this conflict is considered outweighed by the need for the rural workers on site as supported by policy H10 and paragraph 80 of the NPPF.
- 3.4. Policy CL17 further supports the principle of the proposed glamping pods, mobile homes and bakery by supporting the principles of farm diversification subject to the following criteria:

- There is no materially detrimental effect on nearby residential amenity;
- Proposals should benefit the rural economy by providing alternative or additional employment;
- Proposals are compatible with the protection of the countryside in terms of its landscape, wildlife, natural resources and intrinsic recreational value;
- Proposals do not involve the permanent loss of agricultural land of Grades 1, 2, and 3a
- There is not excessive traffic generation or adverse effect on the free flow and safety of traffic;
- The District Planning Authority will expect the proper use to be made of appropriate existing buildings, where proposals require the provision of new workspace;
- Any new building(s) shall be ancillary to and used solely in connection with the use applied for.
- Such buildings should be kept to a minimum size required to meet the operational needs of the new use and be well related to the existing buildings which are the subject of the proposal. In considering the need for new building(s) the availability of existing farm buildings will be a material consideration.

- 3.5. This is further underpinned by paragraph 84 of the NPPF and specifically points a), b) and c) which state, *‘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;’*. Paragraph 85 states further that *‘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’*.
- 3.6. Policy FRES 13 states that the expansion of existing business will be supported provided they do not have a significant adverse impact on the character of the area, adjoining uses, or the amenity of local residents, through either their built form, proposed use or traffic generated. FRES 13 goes on to state that new buildings to accommodate new business or agricultural uses will be positively encouraged, provided they do not have a significant adverse impact on the character of the area, amenity of residents or result in unacceptable increase in traffic generation.
- 3.7. Policy CL18 enables the conversion of agricultural buildings to non-residential uses where they respect the character, amenity and use of the area, which would engage with this proposal owing to the creation of the bakery. It is noted that policy CL18 states, *‘the need to accommodate rural businesses contributing to the local economy and employment will be a material consideration in deciding applications’*.
- 3.8. Paragraph 11 of the NPPF sets out a presumption in favour of sustainable development, underpinned by paragraph 8 which identifies the three objectives of sustainability (economic, social and environmental). It indicates that where the development plan is absent, silent or policies which are most important for determining the application are out-of-date, planning permission should be granted unless any adverse effects of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the NPPF as a whole; or unless specific policies in the NPPF indicate that development should be restricted.
- 3.9. In view of paragraph 11(d) of the NPPF, it is necessary to consider how consistent the most important policies in the development plan are with the NPPF, to assess what weight should be attached to them. Paragraph 219 of the NPPF explains that due weight should be given to relevant policies according to their degree of consistency with the NPPF, the closer the policies in the plan

to those in the NPPF, the greater the weight that may be given. Paragraph 219 makes explicitly clear that existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of the NPPF.

- 3.10. The NPPF does not specifically determine whether the tilted balance applies when 'one of' or 'any of' the most important policies are out of date. However, *Wavendon Properties Ltd v SSHCLG* [2019] EWHC 1524 (Admin) has made it clear that the most important policies should be viewed together in a 'basket of policies' and an overall judgement made whether the policies as a whole are out of date. For the reasons set out above, taken in the round the most important policies for the determination of this application are up to date.
- 3.11. Whilst their overall approach to steer development towards sustainable locations and identify appropriate forms of other development are consistent with the aims of the NPPF, policies CS1 and CS2 are considered to hold limited weight as they are not wholly consistent with the NPPF when assessed against paragraph 219 of that document, based on their prescriptive and blanket approach to development. The Fressingfield Neighbourhood Plan (FNP) was recently adopted and forms part of the District's Development Plan. The policies in the FNP relevant to the application (FRES1, FRES6, FRES10, FRES13 and FRES15) are consistent with the NPPF and are afforded full weight. The remainder of the most important Core Strategy policies and Local Plan policies, as listed within the policy section of this report, are considered to be wholly consistent with the NPPF and as such hold full weight, thus the 'tilted balance' as set out under paragraph 11d) of the NPPF is not engaged.
- 3.12. Having determined that the tilted balance does not engage, it is left to determine the key issues and assess the proposal's performance against relevant policies in the context of those issues. The key issues are:
 - a) The acceptability of the principle of development with regard to policies CS1, CS2, H10, H11, CL17, CL18, FRES1 and FRES13
 - b) The impact of the development on the setting of the Grade II listed farmhouse with regard to policy HB1 and FRES 10
 - c) The impact of the development on landscape character, with regard to policies CS5 and FRES6
 - d) The impact of increased traffic generation on the local road network and adequacy of on-site parking provision with regard to policies T9, T10 and FRES15
 - e) Economic development benefits to the rural economy with regard to policies CL17 and FRES13
 - f) The impact on local biodiversity values with regard to policy CL8
- 3.13. It is further important for the purposes of this determination to understand that the caravans and glamping pods do not in themselves constitute development and as such do not require planning permission, with regard to The Caravan Sites and Control of Development Act 1960 as amended. The mobile homes and glamping pods conform with the definition of a caravan in terms of their construction, dimension and transportability. Thus, the proposal and its determination lies with the acceptability of the change of use of land to enable the siting of caravans and glamping pods.
- 3.1.4 Overall, the proposals constitute farm diversification to secure the future of Wakelyns Farm in a sustainable manner with year-round operations, activities, courses and events in and educational and tourism capacity. There are several small rural enterprises on site relating to farming, food and craft activities all relating to the wider operations of Wakelyns and run by different workers. The farm was originally set up during the 1990s as a trial and research activity into agroforestry. As this was an experimental venture, lessons have been learnt on how to successfully do agroforestry, however as Wakelyns was pioneering in this field, choices were made which have thus restricted the yields that could be achieved. This restricts Wakelyns ability to be

commercially sustainable selling the produce from agroforestry alone. As Wakelyns was a pioneering agroforestry farm in the UK, it has subsequently become widely successful in educating and sharing such lessons, alongside setting up more sustainable and newer ventures to utilise farm produce for the benefit of visitors and local shops. The bakery is proposed to utilise produce from the farm to sell, provide visitors with food and host courses and events which in turn educate people. The glamping pods and mobile homes are to be used to accommodate those coming to and from the site to engage in activities, and for workers who flexibly work across the site to meet different demands at different times of the year. It should be noted that many visitors already visit the site regularly and their travel times and movements would be decreased by the provision of temporary accommodation on site. Such accommodation would help those already working at and visiting the site and provide additional capacity for further growth and viability of existing and any possible future diversification ventures.

- 3.15. The principle of the proposed use as a farm diversification initiative, underpinned by existing established rural enterprises and agroforestry operations, clearly enjoys significant policy support at the national, district and neighbourhood level. The proposal gives direct effect to paragraphs 80, 84 and 85 of the NPPF. At the district level, farm diversification is permitted subject to a range of criteria. At the neighbourhood level, the FNP supports the expansion of business, whilst also positively encouraging new business for agricultural uses in rural areas. The principle of further diversifying the current agricultural offering at the site, through increasing agricultural workers' accommodation, and tourism/educational related accommodation to cater for visitors, is considered acceptable. As such subject to the above points a) to f) of 3.12. being acceptable, the proposal is considered acceptable in principle.

4. Heritage Impact

- 4.1. The Council's Heritage Team are concerned with the absence of evidence substantiating the need for additional accommodation. Officers consider this not relevant to an assessment of the effects of the development on the setting and significance of the nearby listed building, any harm arising to the listed building should be assessed and evident without justification or evidence of need.
- 4.2. The Heritage Officer observes that the areas proposed for the mobile homes and pods are two large areas. In other words, the locations are not specific, making an assessment of the effects on the farmhouse setting more challenging. Whilst this is the case, it is still possible to assess with some confidence on the likely effects, noting that the scale and form of the structures are well detailed and a worst-case scenario can be ascertained by way of identifying the overall areas.
- 4.3. The Heritage Officer notes that the structures could all be positioned as close to the listed farmhouse as possible. This is not the case for the mobile homes, which will be located within the same field south east of the site, well separated from the farmhouse. This separation, and the intervening outbuildings, coupled with the modest size of the homes, ensures the mobile homes are suitably detached from the farmhouse. The area designated for the glamping pods adjoins the farmhouse and so it will be possible that pods could be located close to and visible from the farmhouse. However, it is noted that there are significant numbers of mature trees separating the farmhouse from potential pod locations. Moreover, the fact the pods are of a small scale, mobile and will be moved in line with crop rotation set within rows of established trees, would ensure their visual impact is kept to a minimum and would reduce potential impacts to the setting and significance of the Grade II listed farmhouse. That said, in order to reduce impacts and alleviate potential heritage concerns, the applicant has offered the option of a condition prohibiting glamping pods being sited within 75m of the listed farmhouse. Officers support this conditional approach on heritage grounds and this forms part of the overall recommendation presented to Members within this report.

- 4.4. Because the level of identified heritage harm is deemed to be at above a low level of less than substantial when assessed against Local Plan policy HB1, it must be weighed against the public benefits of the scheme, in accordance with paragraph 202 of the NPPF. Such benefits include support of the rural economy, employment (specifically recruiting local young people) and the environmental and economic sustainability of the site in accordance with policy CL17, CL18 and paragraphs 8 and 84 of the NPPF. These benefits are considered to outweigh this harm. Supporting the sustainability of the site as a whole will also in turn provide a level of assurance and support for the maintenance and continued optimum viable use of the Grade II listed farmhouse.

5. Landscape Character

- 5.1. Core Strategy policy CS5, Neighbourhood Plan policy FRES 6 and paragraph 174 of the NPPF seek to ensure development does not adversely affect the visual scenic value of the landscape and countryside surroundings. FRES 6 specifically identifies four views in the village that are sensitive to development. The site is not located near the four views and therefore the development is not in conflict with this element of the local character policy. Similarly, to Local Plan policy CL8, FRES 6 and paragraphs 131 and 174 of the NPPF also seek to ensure proposals avoid harm to, or loss of, irreplaceable habitats, such as ancient woodland and veteran trees. The proposal does not impact any ancient woodland or veteran trees.
- 5.2. The site is visually very well contained, enclosed on all sides by mature tree planting. The site is exceptionally secluded and visually isolated, over 400m from the nearest trafficable thoroughfare, Fressingfield Road. The development does not require any tree removal, with the structures to be located between tree lines. The mobile homes and glamping pods are extremely modest in scale, limited to 3m in height. The structures are unlikely to be visible from outside the site. Some may be visible from the adjacent Public Right of Way (PROW), however owing to their scale and the treed backdrop, any adverse character effect will be very localised.
- 5.3. Place Services Landscaping, expressed a preference for the mobile homes to be located close to the existing buildings to restrict the creep of development on the land, however as previously noted this would result in an increased impact on the setting of the Grade II listed farmhouse. Notwithstanding this, officers are not convinced this is required given such extreme modesty of the development scale, both in terms of building height, footprint, and number, coupled with the significant screening offered by the mature tree lines. Officers consider that any adverse character effects associated with the mobile homes will be less than 'significant', compliant with Policy FRES13. Both glamping pods and mobile homes are visually unobtrusive and will be tucked into the open lanes between the tree lines and within a well-screened field. In any instance the siting of the mobile homes and glamping pods are sited as such to protect the availability and use of agricultural land.
- 5.4. Any adverse visual impact arising from the glamping pods and mobile homes on the character of the countryside will be extremely low and specifically highly localised to almost within the site confines only and adjacent PROW. The dominant rural setting is not compromised, rather, it is maintained. Place Services Landscaping recommends further information in respect of any additional areas associated with the mobile homes, anything to be added on or around the mobile homes is likely to require planning permission separately and is not being considered under this application. Place Services also raise concerns that the glamping pods are shown in a mixture of black weatherboard, and a yellow colour finish. They are confirmed as being coloured in heritage colours and based on their mobile nature, modest scale and the heavy screening on site, officers do not consider it reasonable to control the colours of the glamping pods as they are not considered to have any overriding landscape harm.

- 5.5. The works undertaken to facilitate the bakery conversion relate to restoration, upgrading and repair works to an existing outbuilding and do not have any landscape impact. Equally the works to enclose the east wing of the existing outbuilding attached to the bakery would not result in any detrimental landscape impact and would retain an appearance reflective of its agricultural functionality which would continue to be used for storage purposes.
- 5.6. The proposal complies with policies CS5, CL8, FRES6, FRES13 and paragraphs 131 and 174 of the NPPF.

6. Residential Amenity

- 6.1. As noted above the site is very isolated, with the closest dwelling to the mobile homes and glamping pods located 355 metres south west. The new structures will not impact the amenity of any neighbouring residents. The few residents on Metfield Lane may experience a slight increase in local traffic, however any increase is well within acceptable amenity parameters and is unlikely to significantly and regularly go beyond the levels of traffic already experienced from existing visitors and staff driving to the site, especially as temporary events on site do not require planning permission. The proposal does not compromise existing residential amenity levels.
- 6.2. The proposal would thus accord with Local Plan policy H17 and paragraph 130 of the NPPF.

7. Highways Considerations

- 7.1. Local Plan policies T9 and T10 and paragraph 110 of the NPPF requires consideration of a number of highway matters when determining planning applications, including parking provision, the provision of safe access, the safe and free flow of traffic and pedestrian safety, safe capacity of the road network and the provision of adequate parking and turning for vehicles.
- 7.2. Many objectors are concerned with the use of Metfield Lane and the increase in traffic generation. The scale of the proposal is extremely modest. There will no doubt be an increase in traffic on Metfield Lane from the proposed farm diversification, however the anticipated daily movements will not be significantly higher than those already experienced from existing events, activities and operations on site, especially in light of how there are already many vehicular movements made to and from the site by existing staff and visitors on a daily basis for work and events that do not require planning permission. Furthermore, the Highway Authority does not raise an objection regarding the capacity of the lane to absorb the extra traffic that will be generated. The Highway Authority specifically note that the proposals impact on the public highway would be negligible as the vehicular access has adequate visibility splays supporting the intensification of use.
- 7.3. The applicant has offered to construct a passing lane by carving into an existing field within their ownership to assist with traffic management. This has not been required by the Highways Authority clearly indicating that they are satisfied with the current road network, however such passing place could nonetheless be delivered should the applicant wish.
- 7.4. Paragraph 111 of the NPPF states that *'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'*. In light of considering both the existing and potential movements that could arise from existing operations on site without the proposed pods, bakery and mobile homes, and given the Highway Authorities position, there is no evidence before officers to suggest that the threshold set out under paragraph 111 and supported by Local Plan policy T10 would be met.

- 7.5. Many residents are concerned with the absence of on-site car parking being shown on a plan. A plan has since been provided showing parking areas that can be used, whilst the application site extends to some 8.61 hectares the whole of Wakelyns extends 23 hectares and thus there are ample areas for the parking of vehicles on the site, specifically noting the existing extent of hardstanding areas. The Highway Authority recommended a condition to ensure these areas are functionally available for parking prior to first use which is considered reasonable and is thus recommended by officers.
- 7.6. The Highway Authority recommended a condition relating to visibility splays and restricting any obstruction of visibility splays over 0.6 metres in height, this does not however meet the tests of a condition as set out under paragraph 56 of the NPPF as the junction between Metfield Lane and Fressingfield Road is not within the applicant's ownership and thus is an unenforceable condition. It has nonetheless been noted by the Highways Authority that the existing visibility splays do already meet the standards required by highways and would not cause any undue harm to either the highway network or its users.
- 7.7. The application responds positively to Local Plan policies T9 and T10 and paragraphs 110 and 111 of the NPPF. Therefore, there are insufficient highway safety grounds to justify a refusal on this basis.

8. Ecology

- 8.1 The ecology consultant has reviewed the supporting ecology report submitted with the application and does not raise any objection subject to conditions requiring compliance with the submitted ecological appraisal recommendations and the submission of a wildlife sensitive lighting design scheme. Both of these conditions are recommended to be imposed.
- 8.2. Noteworthy is the fact the applicant has been working in conjunction with the Suffolk Wildlife Trust and RSPB, who have undertaken their own bird and pond surveys. As noted by the applicant, agroforestry is inextricably linked to the continued enhancement of the biodiversity values of the site. Biodiversity enhancement measures proposed include altering the mowing regime for the areas where the mobile homes are proposed which is supported by Place Services Ecology.

9. Parish Council Comments

- 9.1. The concerns raised by Metfield, Mendham and Fressingfield Parish Councils have predominantly been considered in the above report, however for clarity several issues are confirmed below:
- Caravans and glamping pods do not require planning permission in and of themselves, it is solely the change of use of land that requires permission for their siting.
 - There is nothing preventing the submission of a retrospective planning application.
 - The matters relating to the farmhouse being used as a holiday let are not being considered under this application.
 - Further clarification was sought on the matter of the units being used for seasonal workers or as holiday lets. The glamping pods would provide short-term accommodation for those visiting the site, with some visitors actively participating in activities or events on site. The caravans would be for long-term year-round accommodation for those working on the site as part of their own individual rural enterprises, that are integrated into the operations of Wakelyns, and in the wider agroforestry operations on site. Based on the nature of agroforestry, which has varying

harvest seasons on site and the year-round enterprises on site, defining specific seasonality of work is difficult which is why they have been proposed as year-round.

10. Other Matters

- 10.1. Whilst a business case is not strictly required to support an application for planning permission for the nature of activity/development proposed. A business case has been provided to demonstrate and detail the existing and future operations on the site to the satisfaction of officers. An appropriate appraisal was submitted of nearby available properties for such workers, demonstrating that it is unfeasible for workers to live off site owing to the site's remote location and the cost of properties. It is further increasingly unfeasible for workers to live off site as they are needed on site during unsociable hours, extending from early in the morning to late at night. It is intended that the mobile homes will provide accommodation in the long-term for workers and shall be occupied all year round. Whilst they will provide year-round accommodation they would likely be used flexibly for a variety of staff, with some sharing their time between the site and elsewhere, depending on business needs. However, in light of the mobile homes being required for rural workers on a long-term basis and the relatively new farm diversification ventures, it is appropriate in this case to condition the number of mobile homes and glamping pods on site, that they are to be removed from site when they are no longer in use and ensure such buildings are kept in a good condition for their lifetime.
- 10.2. Similarly, whether the aspiration to become a tourist destination aligns with the original endeavour of Wakelyns operators is not a planning consideration to be given weight to as this application needs to be considered on its merits against current policy. The same applies to the location of where the owners may currently reside, the number of toilet facilities and the need to obtain food safety certification, which are again all non-material considerations in the planning process.
- 10.3. Concerns are raised regarding the use of fire bowls. These are a commonplace domestic arrangement that does not require planning permission.
- 10.4. Insufficient local advertising of an application is noted as a concern of local residents. It is confirmed that the advertising of this application complies with the Councils and national level requirements.

PART FOUR – CONCLUSION

10. Planning Balance and Conclusion

- 10.1. Decision taking begins with the development plan and it is of vital importance that planning decisions are plan-led. The NPPF, an important material consideration, reiterates this fundamental point.
- 10.2. The 'basket of policies' most important in determining the application, are up to date. The 'tilted balance' at paragraph 11d) of the NPPF therefore does not engage.
- 10.3. National and local planning policies expressly support farm diversification, specifically Local Plan policies CL17 and CL18 and paragraph 84 of the NPPF. The proposal will bring about local rural economy benefits through the diversification that is proposed. Accommodation for seasonal workers and those visiting for tourism/educational/recreational purposes is wholly consistent with the well-established use, considered incidental and complementary to it.

- 10.4. The scale of development is extremely modest. Each structure is small and sited in a manner that will not compromise the landscape character of the area. Tucked into the open lanes between mature trees and enclosed field, they will have limited visibility beyond the confines of the site. Any adverse character and landscape impacts will be localised. Ecology impacts have been well considered and are inherently supported by the existing operations on site and through the submission of an ecology report.
- 10.5. The heritage harm identified to the Grade II listed farmhouse is significantly outweighed by the public benefits identified through the support of the rural economy, employment and the environmental and economic sustainability of the site.
- 10.6. The glamping pods, mobile homes and bakery use will not affect the amenity of the nearest neighbour given the isolation of the site.
- 10.7. The Highway Authority does not object to the scheme whereby adequate parking provision and visibility splays can be provided on site to accommodate for any small-scale intensification of the highway network within the locality.
- 10.8. A host of concerns have been raised by objectors and Parish Councils that are not material planning considerations to be given weight.
- 10.9. The proposal responds positively to the aims of relevant Development Plan policies, as well as national policies. There are no material considerations that justify a departure from those policies. In exercising a planning balance, the economic and environmental benefits that have been identified significantly and demonstrably outweigh the negligible localised landscape harm and an above low-level level of less than substantial harm to a designated heritage asset. There are no reasons indicating that planning permission should be refused. The grant of planning permission is therefore recommended.

RECOMMENDATION

That authority be delegated to the Chief Planning Officer to GRANT planning permission subject to conditions as summarised below and those as may be deemed necessary by the Chief Planning Officer:

- Standard 3-year time limit for commencement
- Development carried out in accordance with approved plans
- No more than 12 glamping pods and 6 mobile homes on site at any time
- Mobile homes all sited 6m distance from each other at all times
- Mobile homes to only be located in the areas shown on plan
- Glamping pods located minimum 75m setback from the Grade II listed farmhouse at all times and shall be rotated to different locations within the site.
- Occupation restriction on glamping pods- both in use and time
- Occupation restriction on mobile homes- both in use and time
- Removal of mobile homes and pods from site when they are no longer used on site and any land they were sited on shall be remediated
- All mobile homes shall be kept in well-maintained condition
- Parking provision to be created as shown on plan
- Ecology appraisal implementation
- Wildlife sensitive lighting design scheme to be agreed

And the following informative notes as summarised and those as may be deemed necessary:

- Pro-active working statement in line with NPPF
- SCC Highways notes
- SCC Floods notes
- Any associated items that are attached to mobile homes (such as decking, hardstanding, paths etc) may require additional planning permission.