

Committee Report

Item No: 7B

Reference: DC/22/02458

Case Officer: Elizabeth Flood

Ward: Battisford & Ringshall.

Ward Member/s: Cllr Daniel Pratt.

RECOMMENDATION – REFUSE PLANNING PERMISSION

Description of Development

Planning Application - Erection of 20no commercial units consisting of Class E(g) (office and light industrial) and B2 (general industrial)

Location

Anglia Business Park, Wattisham Road, Ringshall, IP14 2HX

Expiry Date: 30/01/2023

Application Type: FUL - Full Planning Application

Development Type: Major Small Scale - Offices/R&D/Light In

Applicant: Anglia Business Park Ltd

Agent: Mr Jack Wilkinson

Parish: Ringshall

Site Area: 1.91ha

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: No

PART ONE – REASON FOR REFERENCE TO COMMITTEE

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

The Head of Economy considers the application to be of a controversial nature.

PART TWO – POLICIES AND CONSULTATION SUMMARY

Summary of Policies

SP03 - The sustainable location of new development

SP05 - Employment Land

LP09 - Supporting a Prosperous Economy

LP15 - Environmental Protection and Conservation

LP16 - Biodiversity & Geodiversity

CLASSIFICATION: Official

LP17 - Landscape
LP23 - Sustainable Construction and Design
LP24 – Design and Residential Amenity
LP27 - Flood risk and vulnerability
LP29 - Safe, Sustainable and Active Transport

Neighbourhood Plan Status

This application site is not within a Neighbourhood Plan Area.

Consultations and Representations

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

[Click here to view Consultee Comments Online](#)

A: Summary of Consultations

Town/Parish Council

Ringshall Parish Council:

Ringshall Parish Council refutes many of the spurious statements in the **Planning Statement** (Wilkinson Planning Statement, dated April 2022) and those made in the **Transport Statement** (GH Bullard & Associates LLP Civil and Traffic Engineering Consultants, dated May 2022).

- 1) If the applicant is successful in this current application, it will be argued that, as permission was granted for Phase 1, it would be perverse to refuse any subsequent applications. We regard this as development by stealth.
- 2) Our Council believes that this speculative planning application makes numerous assertions which are unfounded and not backed up by any supporting evidence. It also contains several factual errors and ignores the widespread harm that any development of this size might bring to the surrounding countryside area. This would cause additional twice daily and intermittent road traffic hazards to narrow country lanes to the detriment of residents in the surrounding rural area. It would also create additional traffic at pinch points on single track and narrow lanes and create additional traffic in the area of our primary school as traffic would be directed to and from the location along these proposed routes.
- 3) We also have extreme concerns over nearby historic residential properties as set out by Andy Rutson-Edwards, Senior Environmental Protection Officer for Mid Suffolk District Council who has raised concerns in his **Environmental Health Noise/odour/light/smoke Response**, dated 27/05/2022, in which we have similar concerns as he has indicated. Namely, the proximity to an adjoining residential property. Also we maintain that there are other historic properties in the locality which would be affected by potential noise disturbances, vehicle particulate pollution and that from industrial process operations which will potentially involve 100 people We are also concerned about

possible light pollution, and the destruction of a significant rich amounts of biodiversity as deduced from the **Preliminary Ecological Appraisal** (James Blake Associates, dated February 2022 and revised in April 2022). The report highlights the fact that the proposed development site is also within the Impact Risk Zone for at least one of “Four ‘Sites of Special Scientific Interest’ (SSSI)...” (Para. 3.2, Page 12). The current site is considered locally as one which creates a biodiverse environment including an array of different tree and hedgerow species including Aspen, English Oak and Swedish Whitebeam, habitats for Hazel dormice, hedgehogs, bats and a foraging site for fox, rabbit, brown rat and muntjac deer, stag beetles and an array of birds including barn owl habitats and the elusive Turtle Dove.

- 4) Everyone who lives within the area and wider parish regard this area as countryside and the Wattisham Road should be treated as such. The application acknowledges this in the Wilkinson **Planning Statement**, Para 2.1 Page 2, dated 10/05/2022. It goes on to state that the site is “well related to Great Bricett...” omitting to mention that the site is separated from Great Bricett by Wattisham Airfield. The shortest route from Great Bricett to the site 4.7km (Source: **AA Route Planner**). The site is clearly not related to Great Bricett, but lies in narrow country lanes between two hamlets, Charles Tye and Wattisham. It also is situated on a road that has two Suffolk County Council Protected Verges, Roadside Nature Reserves (**Ringshall 136/MSDC 176**) – remnants of the meadows of yesteryear and important havens for rare plants and corridors for wildlife. We note that in areas of increasing commercial vehicle usage that despite of **Mid Suffolk Local Plan (1998)** Policy E8 (Extensions to Industrial and Commercial Premises) referred to in Para 6.6, Page 8, Wilkinson **Planning Statement**, dated April 2022, has not provided sufficient protection to curtilages and verges. The location of this proposed development is also close to our Village War Memorial where the parish remembers its War dead and where relatives visit, providing a peaceful haven.
- 5) Wilkinson **Planning Statement**, Para 2.1 Page 3, dated April 2022 also states that “there are no nearby public rights of way”. The Ordnance Survey map shows that there is a right of way directly adjacent to the site. There is also a signpost on the lane, showing this footpath.
- 6) The application further states that the nearest bus stop is 2.2 km away, without pointing out that this is for a school bus, running into Stowmarket High School. The nearest public bus stop is, in fact 5km away in Ringshall. The site is, to all intents and purposes, inaccessible by public transport. None of the local roads have footways. This means that all visitors to the site (stated as being approximately 100 new jobs) will use private vehicles, adding at least 200 car journeys to local roads each day. This is not an environmentally sustainable proposal.
- 7) The previous planning applications cited in Wilkinson **Planning Statement**, Para 5.1 Page 6, dates back between 5 and 22 years. All were either minor adaptations or seeking changes of use. There are no examples in this list of major developments of the type now proposed. Wilkinson **Planning Statement**, Para 6.3 Page 7, dated points out that there is only a presumption of “sustainable development”. However, as is evident from the rest of the application (about which, more later) this development does not meet the criteria of “sustainable”, and there cannot therefore be a presumption in favour. In fact, the opposite is true. For example, in Para 6.4, Page 8 the applicant states that policy CS2 “explicitly restricts development within the countryside unless it conforms with

one of the other functions of the countryside”. The application merely asserts that this is the case, without giving any justifiable supporting evidence.

- 8) In Para. 6.7, Page 8 the applicant rightly points out that “Policy E9 (Location of New Businesses) directs new...buildings to existing premises, industrial/commercial sites or settlement boundaries and supports them in principle subject to ensuring they do not cause harm **to the highway network, residential amenity or the environment**”. In 6.8, Page 8, the applicant also states that Policy E10 (New Industrial and Commercial Development in the Countryside} “relate to directing new industrial and commercial development towards settlement boundaries unless an overriding need can be demonstrated. New industrial and commercial premises will be assessed specifically regarding their impact on the countryside, pollution, traffic, loss of agricultural land, contribution to the rural economy and employment opportunities...” The applicant provides no evidence of overriding need for this development, but merely asserts that the proposal meets the criteria.
- 9) As stated, the local road network, all small lanes, cannot sustain this development, and that the development would have a significant impact on the environment. It will not contribute to the rural economy because there are no local businesses in the area that will benefit. If people employed at the site already live within, say 10 miles of the site, they will still continue to shop as they do now, in their home vicinity. This application does not provide any specific examples of economic or social additionality. By comparison, the Committee will be aware of another development, the Lion Barn Industrial Estate in Needham Market. This development is within easy walking distance of a railways station, several bus routes and major roads, plus local shops, hotels, and other businesses to support it. This site has none of those features.
- 10) The weakness of the application is best demonstrated by the applicant’s dismissive statement in 6.9, Page 9, “it is not considered that there is a need to demonstrate that such units cannot be located nearer to existing settlements or sites”. We believe the opposite: there is a need to demonstrate precisely this in any planning application which affects people, local villages and hamlets and the environment. The Committee may wish to ask itself why the applicant chooses not to at least to try to demonstrate this fact. The applicant states that the nearest employment opportunities are in other local towns, some miles away, and uses this to assert a reason why a development is needed on this site. The is a false argument. You might as well assert there is a need for a development in the middle of Dartmoor because there are no local employment opportunities. Development should take place where people are, not where people are not.
- 11) Para. 6.10, Page 9, is equally misleading in its argument. Quite correctly, it states that planning policy is to steer development to sites near major road networks (which this site most certainly is not). It then states that the reason these units should be approved is because “it would provide small units thus limiting the space for large scale operations”. We can think of no other instances where the owner of a site has applied for planning permission on the grounds that it would prevent him from doing something else, even worse. **Surely, large scale operations would be prevented by the fact that they would not meet the planning requirements, not because the site is already full.**

- 12)** Para. 6.19, Page 11, warrants much closer examination: “Rural areas typically face certain disadvantages as places for business development. The most important tend to be linked to geography, population, infrastructure, and resources. Relative isolation from markets, insufficient local demand and lack of facilities and services can all restrict the growth potential of the local economy in rural areas”. All of these are features of this site and, we would contend prove, its unsuitability for this scale of development. The applicant states “This proposal would provide a combination of uses which would all contribute to the local area in their own right”. However, no details of this are provided. How might this development contribute to geography, population, infrastructure? We believe the applicant has not provided details because there are none to be provided in support of these assertions.
- 13)** Para. 6.25, Page 11, makes further assertions which we would contest. The presence of existing commercial units and planning history does not, as alleged, establish the overall principle of commercial development of this scale is acceptable. Just the opposite. Our contention is that that the current usage is sustainable, but that further expansion not only falls outside of current planning policy, but that its impact will be overwhelmingly negative whilst giving no local benefit. The weakness of the case is further evidenced when the applicant again acknowledges that “the site is technically in the countryside”. The word “technically” is irrelevant here. It either is, or is not, in the countryside.
- 14)** Para. 6.32, Page 13, “The proposal would offer new employment within a more rural location and thus offers easier access for local employees”. As we have already shown, there are very few people living in this locality (and, equally, very little unemployment). There are no footways or connecting footpaths on the roads, no streetlighting and no public transport. Any employment will rely on people travelling by car.
- 15)** Para. 6.33, Page 13 is entirely misleading. “Economically, the proposal would generate benefit for local trade and residents...Furthermore, there will be a positive benefit through support for local amenities, facilities, and services”. The applicant provides no details for this assertion. We believe that the reason for this lack of evidence is because there are no local services or amenities which would benefit (other than, during the construction stage). We would ask the Committee to question the applicant further, and in detail, on this matter. Similarly, in Para 6.34, Page13, there is an assertion that the proposal would yield benefits which would “create a positive interaction within the immediate surrounding areas”. We have no idea what this means.
- 16)** Para., 6.35, Page 13, As we have already stated, we believe this proposal will have a significant negative effect on the local environment, particularly in relation to the road network and the inevitable increase in car journeys in very narrow lanes. It does not meet the definition of sustainability because it creates an increased dependency on car journey. If the Committee is not familiar with local roads, we would welcome the opportunity to arrange a site visit.

- 17) This site lies in an area of archaeological potential recorded on the County Historic Environment Record according to **Suffolk County Council, The Archaeological Service**, response dated 30/05/2022, which suggests earlier Medieval settlement at the edge of this site. “As a result, there is high potential for the discovery of below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist,” the Service states.

Wattisham Parish Council :

Wattisham Parish Council echo many of the objections of other local residents with regards to their own environmental, traffic, noise, and wildlife concerns, but we wish to make comments and register concerns in particular from a traffic, infrastructure, and road network point of view:

- Transport & road networks: there is no public transport available that services this site/application – the assumption therefore is that most people will travel to the site via car / private transport
- Vehicle sizes: small units will tend to attract lighter vehicles (vans / 7.5t lorries) — which undoubtedly will use the road from Bildeston to Wattisham Village to access the site (and vice versa). This road is not a through road and therefore is generally a very quiet road (with the odd exception of local road closures)
- The road width is restricted at many points from Bildeston all the way through Wattisham Village and subsequently exiting Wattisham Village either via Bird Street or Weir Road. There are few safe passing places. Any increase in small and medium sized vehicles will put pressure on local road networks
- All local roads are constantly used by a number of pedestrians / cycles and local residents with horses. Currently a relatively safe environment for these locals, any increase in traffic will reduce this. There are no pedestrian pavements on any of the routes into or through Wattisham Village – given the narrowness of the roads, this would increase the danger to both pedestrians and other road users
- Wattisham Village is on an official Suffolk Cycle Route path and through the Spring and Summer months there can be a high volume of cyclists through Wattisham Village daily
- Construction traffic: again, undoubtedly, there will be a number of contractors and service providers that will use the route through Wattisham Village to access the site for construction purposes
- Flood risks: there are two flood risk hotspots in the local area that pose a risk to all motorists at points in the year. Both Weir Road (at Weir Cottage) and Bird Street (at Brick Kiln Cottage) are liable to flooding and can become impassable. This also creates a risk of ice during periods of inclement weather, and neither are currently on recognised gritting routes
- Gritting routes – not all roads in the local area are on current gritting routes – this has been detailed in other residents’ objections
- Traffic calming and road safety: as part of the consultation and planning proposal, Wattisham Parish Council would request that Highways consider extending the existing 30mph limit that runs through Wattisham Village – ideally, we would propose that Highways look to extend the current 30mph limit to extend as far as Clay Hill Lane (Bildeston end of the village) and into Weir Road beyond the proposed industrial site and beyond as far as the war memorial. The current 30mph limit feels somewhat restricted, even more so if there is potential of increased traffic levels.
- The village is by its very nature a small, quiet village. There are multiple houses and parishioners along the road who have young children and pets. There is also a plethora of wildlife that can often be seen crossing the road, particularly ducks, moorhens, game birds and more. There are also many deer and muntjac in the vicinity that can often be close to or crossing the roads
- Based on the above reference wildlife etc., the Parish Council would propose that as part of the consultation and planning process, Highways also look for full inclusion of and funding for appropriate traffic calming and warning signs in the local area. Already ongoing are discussions about chevrons for the S bend at Brick Kiln Cottage – despite some assistance from Councillor Robert Lindsay, these are currently

beyond the budget of Wattisham Parish Council. Also, to be considered should be road signs to slow traffic and protect local wildlife. E.g. warning signs for deer and 'ducks crossing' etc.

National Consultee (Appendix 4)

Norwich Airport: Norwich Airport would offer no aerodrome safeguarding objections to the Application.

MOD: The application site occupies the statutory safeguarding zones surrounding RAF Wattisham. In particular, the aerodrome height and technical safeguarding zones surrounding the aerodrome and is approx. 0.64km from the centre of the airfield. After reviewing the application documents, I can confirm the MOD has no safeguarding objections to this proposal.

East Suffolk Drainage Board: The site is near to the Internal Drainage District (IDD) of the East Suffolk Internal Drainage Board (IDB) and is within the Board's Watershed Catchment (meaning water from the site will eventually enter the IDD). I note that the applicant intends to discharge surface water to a watercourse within the watershed catchment of the Board's IDD. We request that this discharge is facilitated in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible. The reason for our recommendation is to promote sustainable development within the Board's Watershed Catchment therefore ensuring that flood risk is not increased within the Internal Drainage District

County Council Responses (Appendix 5)

SCC Fire & Rescue – require fire hydrants

Lead Flood and Water Officer: The following submitted document have been reviewed and we recommend maintaining a holding objection at this time:

- Flood Risk Assessment and Drainage Strategy Ref 246/2021/FRADS P5 A holding objection is necessary because the previous consultation reply from the LLFA required a detailed landscaping and establishment plan for the SuDS features

Highway Authority – recommend conditions

SCC Archaeology: This site lies in an area of archaeological potential recorded on the County Historic Environment Record, in close at the edge of Charles Tye visible on Hodskinsons map of 1783 which suggests earlier Medieval settlement at the edge. As a result, there is high potential for the discovery of below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.

It should also be noted that the site is on an area of likely cold war features/buildings (RGL 058), associated with Wattisham Airfield.

There are no grounds to consider refusal of permission in order to achieve preservation in situ of any important heritage assets. However, in accordance with the National Planning Policy Framework (Paragraph 205), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

Internal Consultee Responses (Appendix 6)

Environmental Protection – sustainability: recommend condition

Environmental Protection – land contamination: recommend condition

Ecology: We note from the Bat Emergence Survey Report (James Blake Associates, June 2023) that a licence for bats will be required before commencement of any works and recommend that a copy of this is secured by a condition of any consent. This is because the emergence and re-entry surveys identified two bat day roosts in Building B13 (one Brown Long-eared day roost and one Common Pipistrelle day roost). We accept that no roosts were identified in Buildings B8 or B14 (Bat Emergence Survey Report (James Blake Associates, June 2023)) and that Buildings B1, B2, B4, B5, B9 and B10 all have negligible bat roost potential (Preliminary Ecological Appraisal (James Blake Associates, February 2022)). We therefore agree that no further bat surveys are required.

The mitigation measures identified in the Bat Emergence Survey Report (James Blake Associates, June 2023) and the Preliminary Ecological Appraisal (James Blake Associates, February 2022) should be secured by a condition of any consent and implemented in full. The proposed habitats, including landscaping to incorporate native and wildlife attracting trees, shrubs and wildlife area should be subject to a long-term Landscape and Ecological Management Plan (LEMP) to ensure they are managed to benefit wildlife and deliver the promised net gain for biodiversity. This LEMP should be secured by a condition of any consent. We also support the implementation of a Wildlife Friendly Lighting Strategy for this application.

We also support the proposed reasonable biodiversity enhancements, which have been recommended to secure net gains for biodiversity.

Recommend conditions

Economic Development: Welcome the submission of a business statement that sets out very clearly the ambition for this development to form a complementary cluster of high skilled businesses supporting the renewable energy and offshore wind sectors centred around the existing main tenant, RMI Engineering Ltd alongside the creation of 100 new jobs in a highly skilled sector. We therefore remain supportive of this application.

Environment Protection (noise): Reviewed the supporting Sound Solution Consultants noise impact assessment Ref: 38482-R1 and I am satisfied that it is robust in methodology and content.

Predicted Night time levels indicate that there will be significant impact on the nearest residential premises for the proposed site use.

Mitigation has been proposed as follows: A 5 m solid barrier about the site boundary, in accordance with Appendix c of the Sound Solution Consultants noise impact assessment Ref: 38482-R1 dated 18 August 2022 The industrial units to have a building structure to achieve Rw 35 dB Operating hours to be restricted to daytime only (07:00 – 23:00),

The above mitigation should ensure that levels from all operations at the site do not exceed the background sound level in accordance with BS 4142:2014 +A1:2019. Based on the above, I have no objections to this being granted. Recommend conditions.

Place Services – Heritage: The proposal site lies within the setting of Grade II listed mid-17th century timber frame house The Cedar. Despite the construction of the existing commercial site along the east boundary, the designated asset still benefits from a mostly unaltered rural setting which positively contributes to the significance of the Cedar and to the way this significance is experienced, appreciated and understood.

While there is limited intervisibility between the proposed development and the designated asset, the proposal is considered to have a negative impact on the significance of The Cedar by changing its wider setting from rural to industrial and commercial, with consequent increase of vehicular traffic along

Wattisham Road, hard standing surfaces, nocturnal lights and all the infrastructures required to a commercial site.

With regards to the National Planning Policy Framework (2021), the level of harm to The Cedar as a designated heritage asset(s) is considered to be 'less than substantial'. As such the local planning authority should weigh this harm against any public benefits of the proposal including, where appropriate, securing its optimum viable use as per Paragraph 202. Whilst the scale of harm may be at the lower end of 'less than substantial', great weight should be given to the heritage asset's conservation Paragraph 199 and clear and convincing justification provided for any level of harm Paragraph 200.

B: Representations

At the time of writing this report at least 16 letters/emails/online comments have been received. It is the officer opinion that this represents 16 objections. A verbal update shall be provided as necessary.

- Support new jobs in the area
- Roads are unsuitable for large vehicles servicing the industrial estate
- Narrow roads which require use of verges to pass other vehicles
- Site is poorly located to support the offshore wind sector
- Lead to highway dangers to pedestrians, cyclists and horse riders
- Detrimental impact on wildlife which currently use the site
- No requirement for the development
- Lion Barn Industrial Estate provides small units and adjacent to railway station and A14
- There is no mains sewerage system
- There is no highspeed broadband within the area
- Could result in pollution within the waterway which crosses the site
- Detrimental impact on Roadside Nature Reserve as vehicles will need to use verge to pass other vehicles
- No public transport
- Unsustainable development
- No pavements or streetlighting
- Will lead to increased surface water flooding
- No local facilities, businesses or amenities which will benefit from the proposal
- Only half the site if this is approved the rest of the site will come forward for development
- Contrary to Planning Policy
- Result in noise, disruption and odours to nearby dwellings
- Lack of demand for business premises in this location
- 80% of development is speculative
- Detrimental impact on neighbouring listed buildings
- Result in air pollution
- Local roads are not gritted leading to highway dangers in winter
- Site is likely to be contaminated
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(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: 1494/17	Erection of single storey front office extension & single storey rear workshop extension	DECISION: GTD 06.09.2017
REF: 1353/02/	VARIATION OF CONDITION 2 OF 386/02 TO ENABLE ALL BUILDINGS ON THE SITE TO BE USED FOR B2 USE.	DECISION: GTD 14.01.2003
REF: 0386/02/	CHANGE OF USE OF EXISTING MILITARY BUILDINGS TO B1 AND B2 USE	DECISION: GTD 26.07.2002
REF: 0707/04	EXTENSIONS TO PREMISES FOR SAWDUST EXTRACT HOUSING & TIMBER STORE.	DECISION: GTD 10.09.2004

PART THREE – ASSESSMENT OF APPLICATION

1. The Site and Surroundings

- 1.1. Anglia Business Park is a former military radar station to the north of the main Wattisham Airfield. The site currently comprises various former military buildings which are now used for industrial uses and a large amount of concrete road ways/hard standing areas. Between the buildings and hardstanding is amenity grass land.
- 1.2 The unit to the front of the site is currently being used by RMI Engineering which works in the Rail, Marine & Offshore Energy and industrial sectors.
- 1.3 To the south of the site is Wattisham Road and then Wattisham Airfield, to the north is a Public Right of Way and an agricultural field, to the east is an unnamed road leading to the hamlet of Charles Tye, to the west is the remainder of the Anglia Business Park and an industrial unit within separate ownership.
- 1.4 The site is within the countryside outside of any settlement boundary. Although the buildings have planning permission for B2 use, the remainder of the site does not have a lawful employment use.

2. The Proposal

- 2.1. The proposal is for full Planning Permission for the Erection of 20no commercial units consisting of Class E(g) (office and light industrial) and B2 (general industrial). The access would remain as existing off Wattisham Road, however the existing road way hardstanding would be removed and a new access road straight up the site would be provided. The existing building to the front of the site would be retained but the remaining buildings on the site would be removed.
- 2.2 The 20 new commercial units would be located to the rear and side of the retained building, the building uses would be as follows:
 - 7 no. Class E Offices
 - 6 no. Class E light industrial

- 6 no. Class B2 general industrial
- 1 no Class B2 general industrial (unit 20) intended to be an extension to the existing occupier of the retained building RMI Engineering.

2.3 Although the agent has stated that the units are proposed to be used for low carbon industries in conjunction with RMI Engineering, the development is speculative, and no potential end users have been identified (except unit 20), nor has the agent suggested conditions to limit the development to any particular industry.

2.4 A 5 metre high solid acoustic fence is proposed to the north and eastern boundaries of the site adjacent to the road to protect the neighbouring properties from potential noise. The existing landscaping to the boundaries would be retained and new tree planting would take place within the site.

3. The Principle Of Development

3.1. The site is within the countryside outside of the settlement boundary of Ringshall Stocks. Although Wattisham Airfield is relatively built up, it does not have a settlement boundary due to its use as a military establishment. Policy SP03 of the Joint Neighbourhood Plan states that outside of the settlement boundaries, development will normally only be permitted where it is in accordance with one of the policies of this Plan listed in Table 5. Table 5 exceptions includes Policy SP05 paragraphs 1, 2 and 5, for development on strategic employment sites, at Brantham and along strategic employment corridors and Policy LP09 paragraph 2 change of use to small scale employment use.

3.2 The site is not a strategic employment site and it is not within 2km of the strategic employment corridors of the A12, A14 and A140. While SP05 states that other land for employment land will be protected for ongoing employment use, it does not state that this includes additional development, particularly noting that this is speculatively proposed and does not represent an extension to the existing business (except for unit 20), but a new development in this respect. It is also unclear if the land which is to be developed has a lawful employment use as opposed to the buildings on the site (which would partly be demolished).

3.3 Paragraph 2 of Policy LP09 relates only to change of use to small scale employment use within a residential curtilage which is not the case at this site. The development is therefore contrary to Policy SP03 as it involves development outside of the settlement boundary and not subject to any other policy. Therefore the principle of development is not supported.

4. Nearby Services and Connections Assessment Of Proposal

4.1. The site is within a very remote location. The nearest settlement with any services for employees is Bildeston approximately 5km away. The nearest strategic network is the A14, located 8.2km away. There is no public transport to the site. As such any employees would be completely reliant on private vehicle to access the site. The businesses would also be reliant on the rural road network for all deliveries.

4.2 Paragraph 89 of the NPPF states 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 (for example by

improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.

- 4.3 As much of the development is speculative it is not clear that it will meet local business need and given the very remote location of the site it is not possible to make the location any more sustainable. However as the NPPF supports commercial development within remote locations in some circumstances, it is not considered that the unsustainable location would be a reason to refuse the planning application, however this does not weigh in favour of the development as proposed.

5. Site Access, Parking And Highway Safety Considerations

- 5.1. The Highway Authority has not objected to the proposal, subject to conditions. Parking would be provided on the site, in accordance with the Suffolk Parking Standards. Parking would consist of:
- 12 HGV spaces
 - 84 parking spaces
 - 18 EV parking spaces
 - 6 disabled spaces
 - 18 cycle spaces
- 5.2 While cycle parking would be provided on site, given the remoteness of the site and the lack of any nearby settlements, it is highly unlikely that employees would cycle to the site.
- 5.3 The number of parking spaces gives an indication of the number of vehicles likely to access the site. The businesses would also be reliant on the rural road network for all deliveries. The surrounding roads are narrow and not especially suitable for hgv's. The proposal would significantly increase the number of vehicles using surrounding roads.
- 5.4 Paragraph 115 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.
- 5.5 Therefore while it is clear that the local road network is not especially suitable for the proposed development, it is not considered that this impact would be severe and therefore highway impacts are not considered a reason for refusal.

6. Design And Layout [Impact On Street Scene]

- 6.1. The layout involves a spine road from the existing site access, with industrial buildings on both sides of the spine road. The development is relatively high density. The building design would be typical of light industrial buildings and is considered acceptable within the context of the development, notwithstanding the landscape impact as considered below.

7. Landscape Impact

- 7.1 While the site is currently well screened by landscaping, it is proposed that the acoustic fence goes on the outside of this landscaping, adjacent to the road and Public Right of Way. The acoustic fence would be 5 metres high and 93m long at the northern elevation and 145 m long on the eastern elevation. The acoustic fence would be timber, but its height and length will be very significant.

Such a feature will be obtrusive and incongruous within the countryside and out of character within the area. While there is security fencing around Wattisham Airfield, this is not as tall and is open wire fencing rather than solid fencing.

- 7.2 The landscape impact on the fence, although only likely to be visible within closer views is considered detrimental to the character of the area and contrary to policy LP17 of the JLP which states that development must integrate with the existing landscape character of the area and reinforce the local distinctiveness of individual settlements.

8. Land Contamination, Flood Risk, Drainage and Waste

- 8.1. There is a holding objection from the Flood and Water Officer relating to information regarding the landscaping of the SUDs feature. This is considered to be a relatively minor detail which could be dealt with by condition. The principle of the SUDs system is considered acceptable.
- 8.2 While the application states that foul water will be dealt with by main sewer, correspondence from neighbours indicates that there is not a main sewer within the vicinity, therefore detail of the foul drainage would need to be dealt with by way of a condition, as a treatment plant within the site maybe required.

9. Heritage Issues [Including The Impact On The Character And Appearance Of The Conservation Area And On The Setting Of Neighbouring Listed Buildings]

- 9.1. The existing hard standings appear to be part of the WW2 expansion of the airfield, they appear on 1945 aerial photographs of Wattisham Airfield. SCC Archaeology have commented on the potential of the site as an area of likely cold war features/buildings associated with Wattisham Airfield. The site is included within the Suffolk Heritage Explorer (RGL 058). The site was a radar station from approximately 1958 and buildings were constructed in the 1960s.
- 9.2 No heritage assessment of the site has been provided and the proposal would result in the complete loss of the WW2 features. These are an important feature within the district as many of the WW2 airfields no longer have preserved hard standings. It is considered that the site is a non designated heritage asset.
- 9.3 Paragraph 209 of the NPPF states that :
The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 9.4 In this case the development would involve the total loss of the WW2 hardstanding area, no justification for this loss has been provided and there is potential for a development retaining and reusing this land as the access to new units. The proposal would also result in the loss of some smaller buildings, in the absence of a heritage report it is difficult to understand the significance of these and the wider heritage asset.
- 9.5 Using the precautionary principle therefore, without a full understanding of these it would be necessary to recommend refusal based on the potential impact of the development on a non-designated heritage asset.

- 9.6 The proposal site lies within the setting of Grade II listed mid-17th century timber frame house The Cedars, which is located west of the site, with the intervening remaining half of the former military site between. The heritage officer has stated that:

Despite the construction of the existing commercial site along the east boundary, the proposal is considered to have a negative impact on the significance of The Cedar by changing its wider setting from rural to industrial and commercial, with consequent increase of vehicular traffic along Wattisham Road, hard standing surfaces, nocturnal lights and all the infrastructures required to a commercial site. With regards to the National Planning Policy Framework (2021), the level of harm to The Cedar as a designated heritage asset(s) is considered to be 'less than substantial' and the scale of harm would be at the lower end of 'less than substantial'.

- 9.7 The NPPF therefore requires that the public benefits outweigh the impact on the designated asset. There would be significant benefits of potentially 100 additional jobs. While these would be located within an unsustainable location, it is considered that the economic benefits would outweigh the less than substantial harm to the listed building.

10. Impact On Residential Amenity

- 10.1. The nearest neighbours to the proposal would be Mead Cottage and Tye Cottage to the east of the site and Cedars to the west. Further dwellings are located to the north of the site at Charles Tye. Mead Cottage and Tye Cottage are located 12 metres from the edge of the site and around 25 metres from the proposed B2 used.
- 10.2 While there are current B2 uses of the site these are strictly controlled by the conditions on planning application 386/02 which included a condition restricting working hours to 7am-7pm Monday to Friday, 7am – 2pm Saturdays and no working on Sunday. In addition, noise was to be controlled to no more than 5db above the background level of 40db and permitted development rights were removed for any extensions or enlargement.
- 10.3 In order to mitigate the development on the occupiers of Mead Cottage and Tye Cottage and the properties in Charles Tye, a 5 metre high acoustic fence would be required on the north and west of the site. This would be located on the outside of the existing trees/hedgerow and result in a severely constrained outlook for the occupiers of Mead Cottage and Tye Cottage as there would be a blank 5 metre high solid fence for 170 metres within 12 metres of their front windows. The use of the acoustic fence to protect the neighbours amenity in relation to noise would result in loss of amenity due to the overbearing impact of the fence.

11. Parish Council Comments

- 11.1 The majority of matters raised by Ringshall Parish Council have been considered in the above report, but the following issues have also been raised:
- If permission was granted for Phase 1, it would be perverse to refuse any subsequent applications.
- 11.2 Only approximately half of the land within the applicants ownership is currently being proposed for development. Should an application subsequently be received for the remainder of the site, this application would need to be considered on its own merits and the planning policy at the time.

PART FOUR – CONCLUSION

12. Planning Balance and Conclusion

- 12.1. The proposal has the potential to bring significant economic benefits to the area, with the potential to provide 100 new jobs and new good quality employment space. In addition there would be economic benefits during construction. The development would also reuse a partly brownfield site.
- 12.2. However the site is within a very remote location, with only a small population nearby and no nearby businesses or services (except for the existing business on the site). Therefore, the economic benefits are unlikely to benefit the nearby community. Policy SP05 supports economic development within existing strategic employment sites and within the strategic transport corridors, close to major arterial routes. This ensures that any transport impacts on local roads are minimised. The site is not within a strategic transport corridor nor is strategically in an area which would benefit from the development.
- 12.3. While the development would reuse a partly brownfield site, this site, due to its age and military connections is considered as a non-designated heritage asset. The development would involve the destruction of much of the historic fabric of the site, the significance of which has not been considered.
- 12.4. The proposed development would provide for B2 uses within close proximity of neighbouring properties. In order to mitigate for the noise impact on the neighbouring properties a 5 meter high acoustic fence is required. However the location of this would be detrimental to the character of the countryside and the amenity of the neighbouring properties.
- 12.5. In conclusion it is not considered that the economic benefits of the proposal would outweigh the detrimental impact of the development in relation to location, the impact on non-designated heritage assets, neighbour amenity and the character of the area.

RECOMMENDATION

That the application is REFUSED planning permission for the following reasons:-

- 1) The proposed development is outside the settlement boundary within the countryside. Policy SP03 of the Joint Local Plan states that outside the settlement boundary development will only be supported subject to being in accordance with policies within table 5. It is not considered that the development is in accordance with Policies SP05 as it is not a strategic employment site or located within a strategic employment corridor.
- 2) The proposed acoustic fences, due to their height and length would be detrimental to the character of the countryside and to the users of the public right of way and occupiers of the neighbouring properties Mead Cottage and Tye Cottage due to loss of outlook and overbearing nature contrary to Policies LP17 and LP24 of the Joint Local Plan and the NPPF.
- 3) In the absence of a Heritage Assessment to understand the significance of the existing hardstanding areas and buildings which are proposed to be demolished, the proposed development has the potential to be detrimental to existing non-designated assets and the wider understanding of the area's development as a World War II airfield contrary to Policy LP19 and the NPPF.

- 4) There is no provision for a minimum of 10 per cent Biodiversity Net Gain. This is contrary to policies SP09 and LP16 of the Joint Local Plan