



SUPPORTING STATEMENT

In respect of a planning application for the conversion of existing outbuilding to form holiday let, and the siting of 2no. rail carriages for use as holiday lets at;

Old Laundry Cottage, Santon Downham, Suffolk

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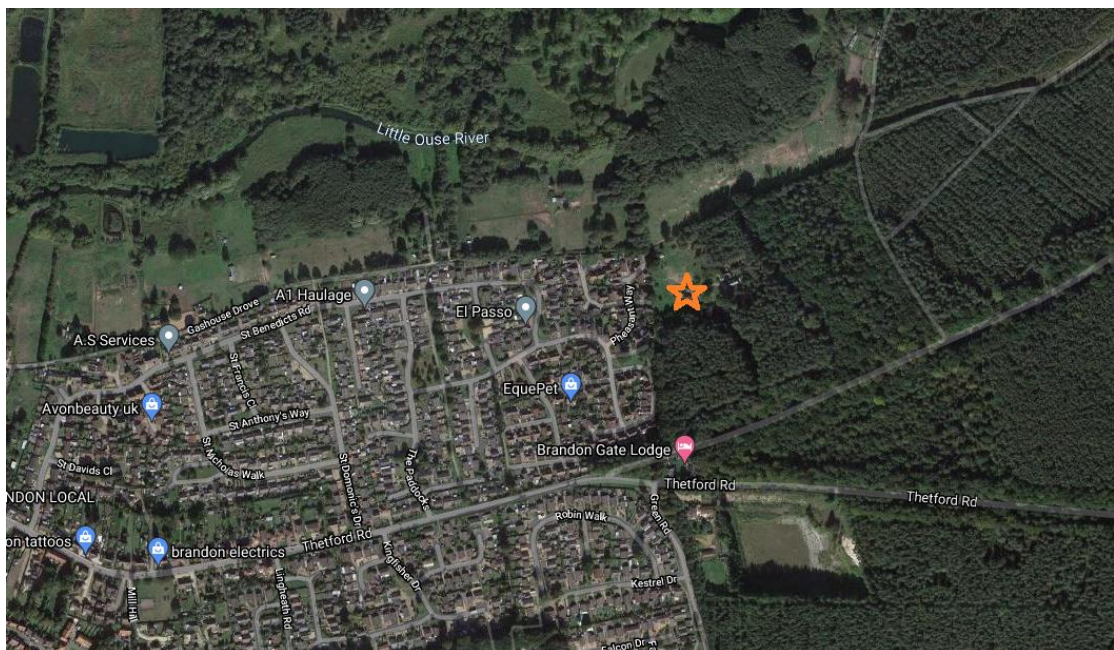
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1.0 Introduction

1.1 This statement is prepared in support of a planning application made on behalf of Mr Morris relating to the conversion of an existing outbuilding to form a holiday let and the siting of 2no. railway carriages for use as holiday lets on land at Old Laundry Cottage, Santon Downham. One of the railway carriages proposed as a holiday let is already sited on the land but is not in use, and would be repositioned and reused as part of this proposal.

1.2 The statement will consider the planning policy position and provide an overview of the relevant material considerations relating to the proposed development.

1.3 The extract below shows the location of the site relative to its surroundings.



1.4 The application is supported by plans prepared by Ian Smillie Architectural Services which show the proposed layout of the holiday lets and the extent of the accommodation that they provide.

2.0 The Site

- 2.1 Old Laundry Cottage is a detached dwelling sitting in good sized grounds immediately to the east of the town of Brandon. Formerly comprising three cottages, the property is accessed from a lane that runs through a wooded entrance to the site, with the dwelling sitting in a large clearing, as shown below.



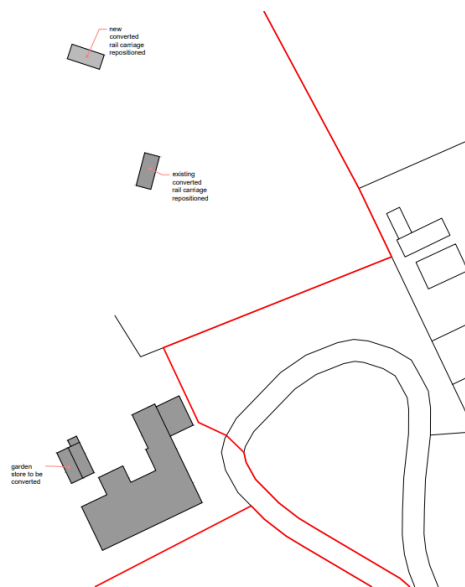
- 2.2 The site is unconstrained by any specific landscape designations and is set outside the Conservation Areas that fall within Brandon and Santon Downham respectively. The property is not a listed building.
- 2.3 The land falls wholly within Flood Zone 1 and is thereby not at risk of flooding.
- 2.4 The existing outbuilding on the land lies close to the dwelling and is in use as a garden store. It is of solid construction and is an attractive pitched roof structure that already serves an ancillary residential purpose.
- 2.5 An existing rail carriage lies to the north of the dwelling.

3.0 The Proposal

3.1 The application comprises three main elements, that are intrinsically linked and summarised as follows;

1. The change of use of the existing outbuilding (garden store) for use as a holiday let;
2. The resiting of the existing rail carriage and use as a holiday let;
3. The siting of an additional rail carriage for use as a holiday let.

3.2 The proposed layout plan (see plan ref: 2021160/02) shows how these three lets would be sited on the land, with the extract below being taken directly from that plan.



As proposed block plan

3.3 As can be seen, the two rail carriages would be sited a short distance to the north of dwelling within natural landscaped grounds with the existing outbuilding lying immediately adjacent to the property.

3.4 Access to the holiday lets would be from the existing access to the site, with parking and manoeuvring space retained adjacent to the house.

3.5 Each of the proposed units would provide a single living/sleeping area arrangement.

4.0 Planning History

4.1 There is no recent planning history affecting this site.

5.0 Planning Policy

5.1 The revised National Planning Policy Framework was published in July 2021. It sets out the Government's planning policy and is a material consideration when determining planning applications.

5.2 The NPPF is supported by the Planning Practice Guidance (PPG), which assists applicants and decision makers to interpret the NPPF.

5.3 On 1 April 2019 Forest Heath District Council and St Edmundsbury Borough Council were replaced by a single Authority, West Suffolk Council. The development plans for the previous local planning authorities were carried forward to the new Council by Regulation. The Development Plans remain in place for the new West Suffolk Council and, with the exception of the Joint Development Management Policies document (which had been adopted by both Councils), set out policies for defined geographical areas within the new authority. It is therefore necessary to determine this application with reference to policies set out in the plans produced by the now dissolved Forest Heath District Council.

5.4 The following policies of the Joint Development Management Policies Document, the Forest Heath Core Strategy and the Council's "Rural Vision 2031" document are relevant to the consideration of this application:

Rural Vision 2031

- Vision Policy RV1 - Presumption in Favour of Sustainable Development

Forest Heath Core Strategy

- Core Strategy Policy CS1 – Spatial Strategy
- Core Strategy Policy CS2 – Natural Environment
- Core Strategy Policy CS3 – Landscape Character and the Historic Environment
- Core Strategy Policy CS5 – Design Quality and Local Distinctiveness
- Core Strategy Policy CS6 – Sustainable Economic and Tourism Development
- Core Strategy Policy CS10 – Sustainable Rural Communities

Joint Development Management Policies Document 2015

- Policy DM1 - Presumption in Favour of Sustainable Development
- Policy DM2 - Creating Places Development Principles and Local Distinctiveness
- Policy DM5 - Development in the Countryside
- Policy DM13 - Landscape Features
- Policy DM28 - Residential Use of Redundant Buildings in the Countryside
- Policy DM34 - Tourism Development
- Policy DM46 - Parking Standards

5.5 The relevance and consideration of planning policies to this proposal will be considered in the 'Planning Considerations' section of this statement which follows.

6.0 Planning Considerations

6.1 Paragraph 82 of the National Planning Policy Framework (NPPF) advocates a flexible approach to economic growth, providing a platform for economic prosperity. It provides that planning policies should;

“d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances”.

6.2 Furthermore, paragraph 84(a) states that 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”.

6.3 Paragraph 84 (c) and (d) provide further support through;

“c) sustainable rural tourism and leisure developments which respect the character of the countryside; and

d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship”

6.4 Paragraph 85 of the NPPF recognises that business and community needs in rural areas will require some flexibility, highlighting 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”.

6.5 At the local level, policy DM34 reflects the aims of the NPPF and provides that;

“Planning applications for new tourism facilities, including overnight visitor accommodation (hotels, bed & breakfast, self catering, holiday lodges, static and touring caravans and tenting fields), or improvements and extension to existing facilities, will be permitted provided that:

- a. the proposals are connected to and associated with existing facilities or located at a site that relates well to the main urban areas and defined settlements in the area and can be made readily accessible to adequate public transport, cycling and walking links for the benefit of non-car users;*
- b. it would not adversely effect the character, appearance or amenities of the area and the design is of a standard acceptable to the Local Planning Authority;*
- c. vehicle access and on-site vehicle parking would be provided to an appropriate standard.*

The larger urban areas (Market Towns and Key Service Centres), will be the focus for larger scale tourism activities and overnight accommodation in accordance with the requirement to concentrate development at the most sustainable locations.

In rural areas any tourism activity/proposal must, in addition to criteria a., b., and c. above, seek to support the existing local community services and facilities, and:

- d. have no significant adverse impact on nature conservation, biodiversity or geodiversity interests, or upon the character or appearance of the landscape and countryside;*
- e. be of an appropriate scale for their context and/or comprise the conversion of suitable existing rural buildings or limited extension to existing visitor accommodation.*

The occupation of any new tourist accommodation will be restricted via condition or legal agreement to ensure a tourist use solely and not permanent residential occupation”.

- 6.6 The development of holiday accommodation is, therefore, something that can be considered under policy DM34. West Suffolk is a rural district with a rich and interesting past and relies on tourism as a means of economic growth. Accommodation for tourists is required to encourage further tourism. The site is well located to access the Suffolk countryside and would provide a peaceful and attractive base upon which to explore the local area and a number of the historic areas nearby. However, it is also very well located relative to Brandon and the extensive services and facilities this offers, and is well located to enable access to Thetford and King’s Forest and other such attractions in the local area. These factors are covered in detail below.

- 6.7 The location of the site falls immediately adjacent to Brandon, a designated market town in the Forest Heath Core Strategy. Vision 4 of the Core Strategy identifies that;

“Brandon is a unique market town because of the quality of the natural environment. Brandon will have reinforced itself as the gateway to the Brecks with expanded areas of heathland interspersed with conifer plantations. The tourism industry will grow and the area will be known as a place to visit and enjoy countryside tourism at its best. Brandon Country Park, High Lodge and Center Parcs (in Elveden, near Brandon) will continue to be popular tourist destinations, attracting many visitors throughout the year.

The market town will become increasingly self-sufficient, meeting the needs of the local community with residential and employment growth. The town centre will be revitalised, providing job opportunities and achieving a high quality settlement with an improved the image of town and its attractiveness as a tourist destination”.

- 6.8 It is of interest that the Core Strategy recognises the role that Brandon and the immediate area plays in the tourism offer of the district, and that the aims of the Core Strategy are to further the attractiveness of the area as a tourism destination.

- 6.9 Spatial objective 7 of the Core Strategy further confirms this, identifying that;

“To support the growth of the visitor economy in the District, and in particular the diversification of the visitor economy in Newmarket to make it a more desirable destination, and to strengthen the sustainable development of Mildenhall, Brandon, the Brecks and the great outdoors”.

- 6.10 Policy CS1 puts this into planning policy requirements, stating that *“The District Council will work with partners to promote Brandon as a tourist destination focusing upon two opportunities including: a proposed Brecks Regional Park; and further promotion of the Little Ouse River for water recreational opportunities”.*

- 6.11 The proposed use on this site would be such that would generate economic benefits in line with the provisions of the NPPF and policy DM34. The site is well located relative to a number

of local areas of historic and tourist interest, but would also provide good access to the open countryside and aforementioned forests for those wishing to walk and recreate. In terms of the site's relationship to facilities and services, the site lies in reasonable proximity to both Thetford and Bury St Edmunds where there are also significant facilities and services that would support new development of this form.

- 6.12 The site also enables good access to country lanes and footpaths that would, therefore, also be an attractive destination for those wishing to cycle and walk. As such, it can be seen that the proposal would provide a desirable tourist location for a wide spectrum of holiday users.
- 6.13 A high level of occupancy is expected, having wider benefits on nearby villages by sustaining their services (particularly shops, public houses, restaurants and attractions) and enabling their further development. There would also be significant economic benefit resulting from the direct and indirect employment resulting from this accommodation.
- 6.14 The effect of the Covid-19 pandemic on the hospitality industry has been significant. Many commentators suggest that 'normal' life in a post-coronavirus environment would not resume until a vaccine for the virus is developed and widely distributed. Whilst this has now occurred, it has taken some time to achieve such that the effects of the pandemic have had major implications for the hospitality and travel sector.
- 6.15 The Organisation for Economic Co-operation and Development (OECD) anticipates that there will be a two per cent reduction in global GDP for every month of country lockdown and this would further delay the revival of the hotel and leisure market. Furthermore, in a recent newspaper article (25th June 2020) relating to the impact of Covid-19 on the hospitality industry, the author identified that;

A number of pub operators with sites at some of Britain's most popular tourist spots believe a recent spike in staycation bookings will prove 'critical' in their recovery from Covid-19.

Though outbound travel to destinations across Europe is expected to resume from 4 July – with the Government apparently poised to confirm travel corridors to up to 10 countries in the coming days – a recent surge in online activity demonstrates unprecedented demand for a British bolthole once lockdown restrictions are eased.

According to figures released by Rest Easy Group – the parent company of brands such as Snaptrip, DogFriendlyCottages.co.uk, Big-Cottages.com, LastMinute-Cottages.co.uk and LateRooms.com – web traffic increased by up to 381% at peak hours across its portfolio after Boris Johnson announced the easing of lockdown measures on Tuesday 23 June.

What's more, the group has also revealed an increase of 69% in traffic and 172% in bookings compared with this time last year - with more than 50% of staycation reservations made for July.

Two fifths of these bookings were made by couples or families, while 58% were from groups of three or more adults.

"It's no secret it's been a tough few months for the travel sector worldwide, so we welcomed the news from the Government that staycations will be allowed to go ahead from 4 July and it seems the public did too," Matt Fox, CEO and co-founder of Rest Easy Group, said.

"During the past three months, we have seen a steady increase in bookings for mid-to-late 2021, but the Prime Minister's announcement sent a flood of new traffic to all our brands as people get excited about travelling again in 2020."

- 6.16 The applicant is thereby conscious of an increasing need for such facilities, with the Chief Executive of holiday firm Kuoni identifying recently that;

"It's clear from the conversations we're having with customers and booking patterns that many people will opt to stay closer to home within the UK this year, as they see overseas travel in the near future as being too risky".

- 6.17 It is also well reported that UK campsites are currently experiencing a surge in bookings as more people plan staycations this summer, with local establishments now seeing tourists starting to return to the area, and many news reports highlighting the desirability of the Suffolk countryside for people coming out of London and other large conurbations during the pandemic. That position also aligns with reports from Auto Trader, who recently confirmed that;

“interest in online adverts for caravans was up nearly a fifth compared with the same time last year”.

- 6.18 It is anticipated that there will be a point of recovery for the tourism sector, and the Government can help with the recovery of the market by introducing measures that encourage the renewal of tourism initiatives. The business and personal leisure travel market will return only once both employers and individuals feel that it is safe to do so again from a health perspective, and as the global lockdown concludes, people will be less interested in spending money on material possessions and instead are likely to spend on holidays, travel and experiences. The medium term prospects of the accommodation and leisure sector are, therefore, good, and this proposal helps to support that through the delivery of good quality accommodation in an attractive and desirable setting close to a town that is identified as an area upon which tourism has, and will have, a significant effect.
- 6.19 The proposal thereby delivers benefits that would help deliver the economic objective of sustainable development as set out in the NPPF. Having established these principles, attention turns to the specific impacts of this proposal using the following headed sections.

Design and Layout

- 6.20 Paragraph 126 of the NPPF identifies that *“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process”.*
- 6.21 Paragraph 130 sets out a number of factors that planning policies and decisions are expected to achieve, including that developments should function well and add to the overall quality of the area, be visually attractive as a result of good architecture, layout and appropriate and effective landscaping, be sympathetic to local character and history, including the surrounding built environment and landscape setting, and establish or maintain a strong sense of place.

- 6.22 The proposal seeks to reuse the existing traditional outbuilding on the site which lies immediately adjacent to the property. The building would be amended internally, but there are no proposed changes to the exterior of the building to facilitate the use.
- 6.23 The building is an attractive building that is a benefit to the site. The absence of change to the building is a positive aspect of this proposal and enables the use as a holiday let without any detriment to the existing dwelling.
- 6.24 The proposed rail carriages (one of which already exists and is being re-sited) are of simple form and low scale. They will sit comfortably on the land and are sited well away from the site boundaries to ensure space around them and to minimise any impacts on neighbouring properties. The site is well contained by trees in any event, ensuring that these units would not intrude into the wider landscape.
- 6.25 The proposal is thereby entirely compliant with the Council's design policies and the respective elements of the NPPF which deal with design.

Highway Safety

- 6.26 Paragraph 109 of the NPPF confirms 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.
- 6.27 On-site parking is provided in accordance with the requirements of the Suffolk Adopted Parking Standards SPD (2015), ensuring users of the units are provided with on-site parking provision, thus avoiding parked vehicles on the public highway. Ample space exists for the manoeuvring of vehicles, and the turning space is functional and designed so as not to dominate the site.
- 6.28 The access onto the road contains a triangle such that those turning left into the site have a gradual turn into the access lane, and gives space for vehicles that meet accessing and leaving the site to pass. The level of traffic generated from this proposal would not be such that would

result in a significant intensification of this access in any event. The unnamed lane from which the site is accessed is relatively quiet with only one recorded incident near to the junction in 2007 (a 'slight severity' crash in 2007) according to www.crashmap.co.uk.

- 6.29 As such, the proposal can be seen to meet the requirements of the development plan and the NPPF insofar as it relates to highway safety and parking.

Residential Amenity

- 6.30 Paragraph 130 of the NPPF sets out a number of core planning principles as to underpin decision-taking, including, seeking to secure a good standard of amenity for all existing and future occupants of land and buildings.

- 6.31 The site is of a scale that will ensure that the proposal can be accommodated without giving rise to any overlooking of/views into neighbouring property. Furthermore, the spacing between the proposed holiday lets and existing properties means that the proposal would not give rise to loss of light to neighbouring occupants nor would the proposal have an overbearing impact on any adjoining land. Due to the small size of the proposed units it would be reasonable to suspect that no residual noise would be created from the occupants.

- 6.32 Occupants of the holiday lets would benefit from the use of amenity space that is set well away from any road/noise generating uses and is private. As such, the proposal would offer good quality amenity space in line with the aims of paragraph 130 of the NPPF.

Flood Risk and Drainage

- 6.33 The site lies wholly in Flood Zone 1 and is thereby outside the designated Flood Zones 2 and 3. Suitable drainage can be designed to ensure that the development does not increase the risk of flooding elsewhere by use of soakaways (if ground conditions permit) or SUDS designed systems.

- 6.34 As such, there is no identifiable restraint upon the delivery of drainage for both surface and foul water that would prevent planning permission being granted in this regard.

Sustainable Development

6.35 Paragraph 8 of the NPPF sets out three objectives to achieving sustainable development;

“a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”.

6.36 The proposal is considered to encompass all three of these objectives.

6.37 Economically, there are clear and demonstrable benefits resulting from the delivery of much needed tourism accommodation as confirmed through the Core Strategy and policy DM34. The proposal is highly likely to support local communities and facilities through expenditure at local facilities and services. There would be significant direct and indirect employment resulting from this facility, offering and supporting rural jobs. The proposal meets not only the provisions of the NPPF in this regard but is also wholly compliant with policies CS1 and DM34.

6.38 From a social perspective, the support offered to local facilities and services through the generation of additional employment in this rural area will bring social benefits through the support to local communities and the investment in the local area. The social benefits of

tourism for those taking holidays and breaks in a setting such as this are significant, with relaxation and recreation an important part of ensuring health and wellbeing.

- 6.39 Environmentally, whilst it is clear that any holiday facilities such as this will require travel to and from them, the site is well located for walking, cycling and public transport. Significant facilities are available within a short distance of the site, including the extensive facilities in the town of Brandon itself.
- 6.40 The proposal would make effective and efficient use of land, and would be constructed to a good specification that would minimise waste and energy usage. Existing landscaping is retained and would not be threatened by the proposal, such as to secure the existing ecology position on the site.
- 6.41 The proposal has, thereby, demonstrated environmental sustainability also.

7.0 Planning Balance

- 7.1 As identified through the course of this statement, there are a number of issues which the LPA will need to balance in reaching a decision on this proposal. This section of this statement seeks to work through these matters and balance them in a manner that is consistent with how both Planning Inspectors and the Council's Planning Officers have carried out the balancing exercise in respect of recent applications that bring about similar considerations.
- 7.2 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990, applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The consideration is, therefore, whether the development accords with the development plan and, if not, whether there are material considerations that would indicate a decision should be taken contrary to the development plan.
- 7.3 The development plan includes the Joint Development Management Policies Document, the Forest Heath Core Strategy and the Council's "Rural Vision 2031" document.

- 7.4 The proposal seeks to deliver tourist accommodation on a modest scale. The Core Strategy recognises Brandon as a focus for such development , with the site being located immediately adjacent to the built up part of the town and offering good access to it. The proposal would, therefore, help to support the aims of the development plan to support rural communities through the delivery of good quality tourist accommodation in sustainable locations.
- 7.5 This statement has considered the extent of harm resulting from this proposal. It has found that there is no tangible harm resulting to important material considerations including highway safety, residential amenity, landscape impact or flood risk. As such, there are no specific issues resulting from this proposal that would weigh against it.
- 7.6 The proposal has also been tested against the three objectives of sustainable development. It has been found to deliver economic, social and environmental benefits, thereby demonstrating compliance with all three objectives. As such, a conclusion can be drawn that this is a sustainable development that complies with both the development plan and the NPPF as a whole.
- 7.7 For these reasons, it is requested that the Local Planning Authority confirm this position by granting planning permission in the terms requested.