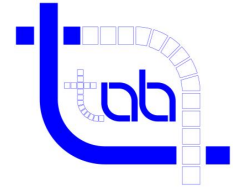


# **PLANNING, DESIGN AND ACCESS STATEMENT**

**Site:** Brome Grange Hotel, Norwich Road, Brome, IP23 8AP

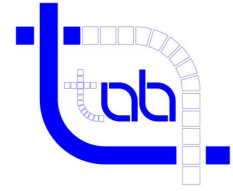
**Proposal:** Outline Application - Erection of 4 no. commercial units (Class E) to include a micro brewery, laundry service, dry goods and fresh goods.

**Applicant:** Cameron Ventures Ltd



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- 2.0** Site and Surrounding Area
- 3.0** Proposal
- 4.0** Planning Policy
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- 6.0** Material Planning Considerations
- 7.0** Planning Balance

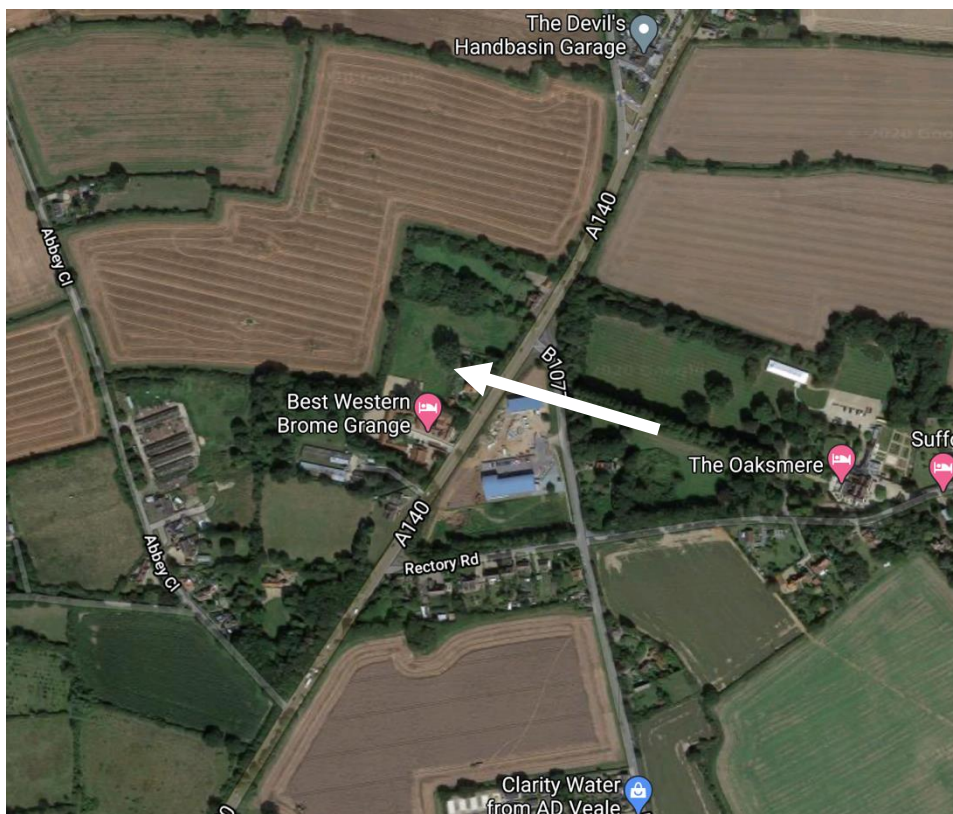


## Introduction

This statement is prepared on behalf of Cameron Ventures Ltd in respect of; Outline Application - Erection of 4 no. commercial units (Class E) to include a micro brewery, laundry service, dry goods and fresh goods.

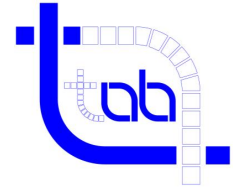
It will consider the planning policy position and provide an overview of the relevant material considerations relating to the proposed development.

The extract below shows the location of the site relative to its surroundings and other nearby development.



## Site and Surrounding Area

The application site is located west of the A140, one of Mid Suffolk's strategic roads. The site is located to the north of Brome Grange Hotel and is located west of two-storey detached dwellings (Oak-Tua and Oak-Tua Cottage) and south of The Swan public house.

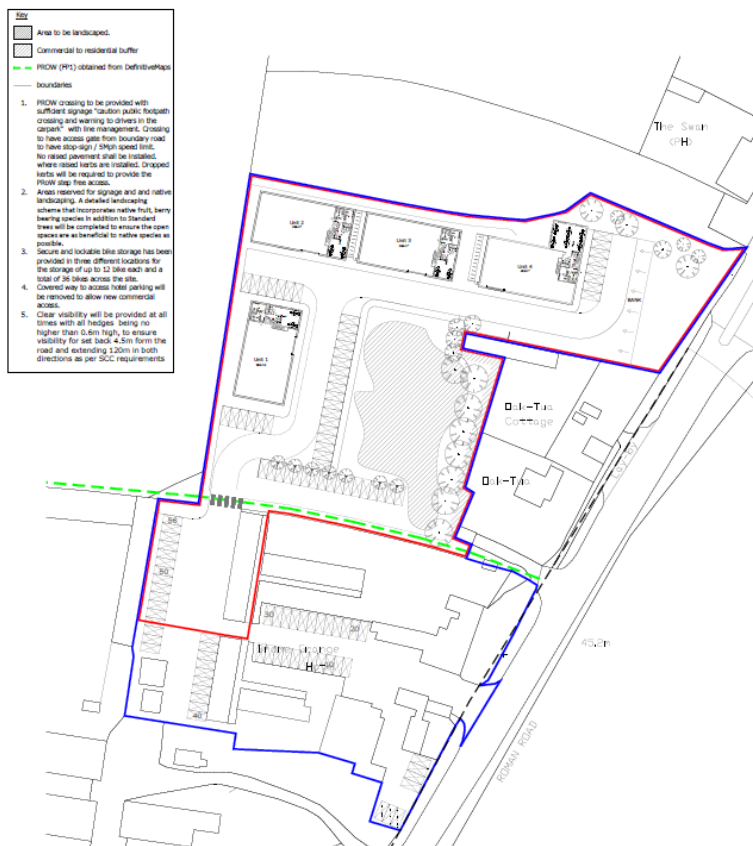


To the east of the site are newly built industrial buildings and dwellings. Through the eyes of planning policy, the site is within the countryside. Whilst the site is technically within the countryside it is located amongst a cluster of development surrounding Brome Triangle. There is a rich mixture of traditional and more contemporary dwellings within the locality, reflecting their age.

The site is located within flood zone 1 and is therefore not considered vulnerable to flooding. The site is not within any designated landscape area (for example AONB or SLA) and is not within any designated ecological area. There are no trees on site which are protected by Tree Preservation Orders (TPO), the nearest TPO is located to the front of Brome Grange Hotel. The site is not within any Conservation Area. Whilst there are no listed buildings immediately adjacent to the site, to the east there is the Grade II listed Cornwallis Arms which is significantly separated from the site. There are no known land contamination issues on site. The site is therefore unconstrained.

## **Proposal**

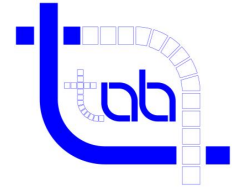
The proposal seeks the erection of 4 no. commercial (Class E) The proposed plans provide context:



The application is supported by a suite of plans and documents including;

- Application Form
- Drawings
  - Site location plan
  - Existing site plan
  - Proposed site plan
  - Commercial unit plans/elevations
  - Residential unit plans/elevations
  - Land use plan
- Land Contamination Report
- Planning Statement
- Design Expectations Checklist

## Planning Policy



The National Planning Policy Framework 2019 (NPPF) 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-making purposes.

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

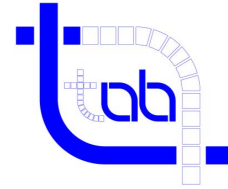
The Development Plan for Mid Suffolk consists of:

**Mid Suffolk Core Strategy Focused Review (2012)**

- Policy FC1: Presumption in Favour of Sustainable Development
- Policy FC1.1: Mid Suffolk Approach to Delivering Sustainable Development
- Policy FC2: Provision and Distribution of Housing
- Policy FC3: Supply of Employment Land

**Mid Suffolk Core Strategy (2008)**

- Policy CS1: Settlement Hierarchy
- Policy CS2: Development in the Countryside and Countryside Villages
- Policy CS3: Reduce Contributions to Climate Change
- Policy CS4: Adapting to Climate Change
- Policy CS5: Mid Suffolk's Environment
- Policy CS9: Density and Mix



### **Mid Suffolk Local Plan (1998)**

- Policy SB2: Development Appropriate to its Setting
- Policy GP1: Design and Layout of Development
- Policy CL8: Protecting Wildlife Habitats
- Policy H7: Restricting Housing Development Unrelated to the Needs of the Countryside
- Policy H15: Development to Reflect Local Characteristics
- Policy H16: Protecting Residential Amenity
- Policy H17: Keeping Residential Development Away from Pollution
- Policy E10: New Industrial and Commercial Development in the Countryside
- Policy E12: General Principles for Location, Design and Layout
- Policy T9: Parking Standards
- Policy T10: Highways Considerations in Development

### **Supplementary Planning Guidance**

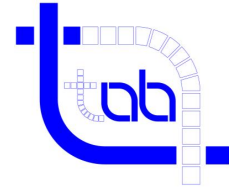
- Nationally Described Space Standard (2019)
- Suffolk Adopted Parking Standards (2015)
- Suffolk Design Guide (2000)

### **National Planning Policy Framework (2019)**

- Para 7: Achieving sustainable development
- Para 8: Three dimensions to sustainable development
- Para 11 – 14: The presumption in favour of sustainable development
- Para 47 – 50: Determination of planning applications
- Para 80 – 84: Building a strong competitive economy
- Para 124 – 132: Achieving well-designed places

The proposed development has been primarily assessed having had regard to core policies FC1, FC1.1, CS1, CS2, H7 and E10.

Policy CS1 and CS2 operate inter alia, identifying a settlement hierarchy and approach to directing development towards Towns and Key Service Centres, away from Countryside locations. These policies are considered to hold very limited weight, given their prescriptive



approach in directing and restricting the location of development, which is wholly inconsistent with the aims of paragraph 213 of the NPPF.

## **Planning History**

There is no recent planning history identified on the LPA's planning system for this site. Nonetheless, the planning history is provided for completeness:

Application No: 3564/13

Proposal: ERECTION OF TWO STOREY EXTENSION TO EXISTING HOTEL INCORPORATING 14 NO. ADDITIONAL ENSUITE BEDROOMS, EXTENDED RESTAURANT AND LEISURE SPA FACILITIES.

Application No: 0003/13

Proposal: ERECTION OF MARQUEE WITH ASSOCIATED TERRACE AND GARDEN AREA.

Application No: 1796/07

Proposal: EXTENSION AND ALTERATIONS.

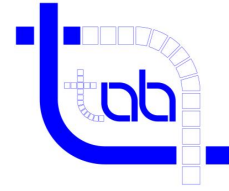
Application No: 1230/03

Proposal: ERECTION OF SCREEN WALL ALONG FRONT BOUNDARY WITH CLOSURE OF SECOND ENTRANCE.

Application No: 0499/95

Proposal: EXTENSION TO MOTEL ACCOMMODATION TO PROVIDE ADDITIONAL 48 HOTEL ROOMS WITH COVERED WALKWAY LINKS AND CAR PARKING FOR 48 CARS.





## Material Planning Considerations

### Principle of Development – Commercial

Taking the commercial element of the proposal first, the site is located along an arterial road through the District which links the site regionally.

Policy E10 relates to directing industrial and commercial development towards settlement boundaries unless an overriding need can be demonstrated. New industrial and commercial premises will be assessed specifically in regard to the impact on the countryside, pollution, traffic, loss of agricultural land, contribution to the rural economy and employment opportunities in line with the NPPF.

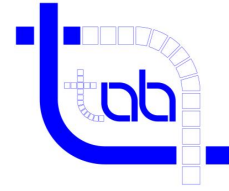
At a national level, Paragraph 10 of the NPPF states; *“So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development”*.

Paragraph 8 sets out three dimensions for 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”*.



Paragraph 81 advocates a flexible approach to economic growth, providing a platform for economic prosperity. 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.”*

Paragraph 83(a) states that planning policies and decisions should enable:

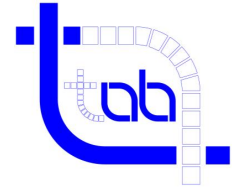
*“a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings”.*

Paragraph 84 of the NPPF is intrinsically focussed on rural commerce:

*“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”.*

The proposal abundantly reflects the Development Plan policies cited in harmony with Paragraphs 8, 81, 83(a) and 84 of the NPPF.

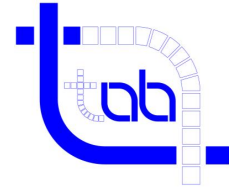
The proposal does not engage the need for sequential test under Paragraph 86 of the NPPF. Given the minor type application, the size of the site being less than 2,500sqm<sup>2</sup> and the appropriateness of the B2 nature, a sequential test is not engaged. For the avoidance of doubt, it is considered that the proposal would not generate an adverse impact upon the nearby commercial service area. The commercial harm caused as a result of the works is considered negligible, and would in any event enhance the vitality of Brome and surrounding areas.



Rural commerce should not be discouraged, hindered or oppressed. Certainly, rural communities are changing and the supply of commercial uses and facilities in the District's prime commercial corridors should be endorsed. There has been a stand out need for rural enterprise and a high demand for commercial property, particularly for smaller businesses. Whilst the delivery of housing is a prominent aspect of the present day planning landscape, places for people to work are also a necessity. This scheme would offer a suitably scaled in demand commercial use, without demonstrable harm to the established commercial growth areas of the district.

Finally, planning permission has been granted nearby under reference 4066/16 for; Erection of six technology starter units in two detached blocks (Class B1 a,b,c) and purpose-designed headquarters building (Class B1 a,b,c) (revised scheme to previous applications reference 2908/13 & 2150/10), with associated vehicle parking and landscaping utilising existing vehicular access. Clearly, the principle of development on site is acceptable.

The site is a heavily underutilised commercial plot which requires a fresh injection of commercial uplift. The site carries good employment potential which is yet to be fully unlocked. A viable scheme is now proposed, which would generate good commercial benefits locally attracting custom from the wider area.



### Highways Access, Parking and Safety

The proposal utilises existing site access for both the commercial hotel and our proposal, all to LHA standard. Policies T09, T10 and the supplementary Parking Standards require that all new development will allow for safe and sufficient highways access, including adequate parking provision relative to the scheme proposed.

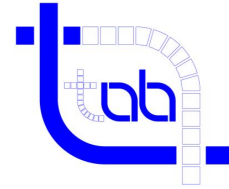
Paragraph 109 of the NPPF confirms that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. The courts have held that the principle should not be interpreted to mean anything other than a severe impact on highway safety to be acceptable (*Mayowa-Emmanuel v Royal Borough of Greenwich [2015] EWHC 4076 (Admin)*), which this proposal does not create.

Highways safety is an integral aspect of the scheme. It is necessary to consider the current access which is to provide for the commercial element of the scheme, and the current access which shall provide for the residential element. Both accesses meet the specification and visibility splay guidance, as they are established and in use.

In addition, the scheme has sought to incorporate the Public Right of Way (PROW) which runs through the site, through a devoted crossing point within the site. This would be a fully bound feature, which would delineate pedestrians from hotel and commercial use vehicles.

On site, sufficient space is provided to allow a vehicle to manoeuvre within the site and re-enter the highway in a forward facing gear. The primary access is suitably set thus not to create unacceptable highways risk. The scheme capitalises upon sustainable transport modes. Given the close proximity of services, facilities and amenities available, cycling is made an entirely realistic and viable environmentally friendly option for future owner / occupiers.

The proposal responds well to Policies T09, T10 and the Parking Standards, as underpinned by case law. There is nothing before Officers to suggest the scheme should be refused upon highways grounds.



## Landscape Impact

Policies CS05 underpins the notion of preserving and enhancing character of areas through appropriate design. Paragraph 170 of the NPPF seeks to conserve and enhance biodiversity and the natural environment. The site is not located in a protected landscape area (for example Article 4, Conservation Area, AONB, SLA or Green Belt). The site does not contribute to a designated landscape warranting special protection measures.

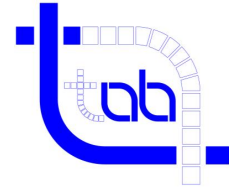
Nonetheless, the proposal does include provision for a devoted landscaping scheme which is to be considered by the LPA as at Reserved Matters. The applicant appreciates the mixture of uses within the area, as shown on the land uses plan.

The development will not appear isolated in a visual sense, owing to the enclosed nature of the north, east and southern boundaries set amongst the existing body of the cluster. The western boundary is open in places, however the landscape mitigation potential could adequately reduce the inevitable urbanising effects of the scheme. Boundaries will be reinforced with new mixed native species, including a buffer through the site to divide the commercial and residential entities. The limited landscape harm is therefore capable of mitigation and the effects would be satisfactory.

## Sustainability

The relationship to existing built development - The site sits amongst built settlement, and is therefore considered inherently sustainable by virtue of its superior relationship to existing built development. The proposal site sits adjacent to commercial units and residential dwellings of the A140, including near to very recent approvals by both the LPA and the Inspector. As such, and in consideration of the extent of the defined site outline, the proposal is spatially related.

The relationship to facilities and services, and their accessibility - The site is also in easy access of public transport links, connecting the site to the District and beyond. As such, journeys by bus and foot are an entirely realistic option for future owner / occupiers. Furthermore, journeys by bicycle should not be discouraged either. Future occupiers of the proposed site would not be solely reliant on the use of a private motor car.



The site and surrounding area demonstrate evident connectivity as presented.

The proposal carries the opportunity to incorporate the following sustainable benefits:

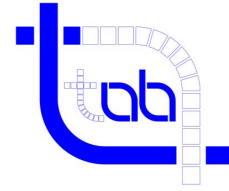
- Grey water filtration units
- Swift bricks
- Triple glaze windows and doors
- High performance insulation (GWP less than 5)
- Energy efficient integrated appliances
- Solar energy
- Air / Ground source heat pumps
- Vehicular charging points
- Renewable technologies which would facilitate low-carbon development

Notwithstanding the limited harm this scheme would create, these benefits are considered to go a significant way to offsetting any limited environmental harm that may be considered to occur. As such, any harm would not significantly and demonstrably outweigh the benefits of the scheme.

#### Other Matters

Whilst this application does not attract the detailed consideration of design and layout, residential amenity, ecology and biodiversity, or flood and water, it is a prudent exercise to consider the detailed potential of the site deliverable through a Reserved Matters application.

Delivery of an acceptable design and layout is an entirely realistic prospect which would remain within the control of the LPA at Reserved Matters. The applicant is focussed on delivering a Reserved Matters scheme which harmonises in design, layout and character terms within the area.



## Heritage

The site is not constrained by any Conservation Area and / or Listed Building consideration. The works would not impact upon the setting of a Conservation Area or heritage assets within the locality, therefore determination does not involve heritage assessment.

## Ecology and Biodiversity

Regulation 9(5) of the Conservation of Habitats and Species Regulations 2010 (Implemented 1st April 2010) provides that all "*competent authorities*" (public bodies) to "*have regard to the Habitats Directive in the exercise of its functions*".

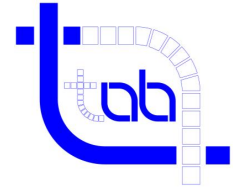
There are no recordings of protected species or their habitats within the site or likely to be affected in the immediate area. It is highly unlikely that any protected species would be found within this site and as such this proposal is not considered to be harmful in terms of ecology or biodiversity.

Guidance on the conservation of protected species is given in ODPM Circular 06/2005. At Paragraph 99 the Circular advises that the presence or otherwise of protected species, and the extent to which they might be affected by the proposed development, must be established before planning permission is granted.

However, developers should not be required to undertake surveys for protected species unless there is a reasonable likelihood of the species being present and affected by the development. Where this is the case, the survey should be completed and any necessary measures to protect the species should be in place before the permission is granted.

## Flood and Water

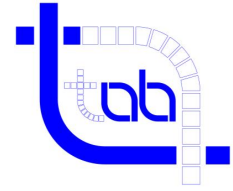
The site is not located in a vulnerable flood zone area, therefore the risks of flooding are considered to be low. Given that the application is considered 'minor', on site attenuation and surface water management / disposal is nonetheless provided, ensuring that the sites 'sealed surfaces' are properly managed. The applicant is fully aware of their obligation to comply with Part H (Drainage and Disposal) of the Building Regulations 2010.



## Land Contamination

The site is currently open grassland associated with Brome Grange Hotel. There is no known land contamination issue, with an extremely low contamination potential. For the avoidance of doubt, the application is supported by a comprehensive Phase I report. The site is not considered to present risk to future owner / occupier through land contamination.





## **Planning Balance**

The proposal seeks planning permission for; Outline Application - Erection of 4 no. commercial units (Class E) to include a micro brewery, laundry service, dry goods and fresh goods.

Policy supports the principles of development including the proposed access and landscaping layouts, with demonstrable social, economic and environmental benefits accruing. The site is intrinsically related to built settlement and form with good access to services, facilities and amenities as presented through preferential location.

The proposal is a wholly deliverable prospect, making effective use of land, without undue harms. Certainly, the positive benefits accruing far outweigh the limited harms identified (notwithstanding the nugatory harm justified by this statement). The scheme is robustly supported at a local and national level offering a truly sustainable scheme which is heavily aligned to local and national planning policies.

In light of this, and taking account of all the considerations set out above, it is hoped that the LPA will support this sustainable development by granting planning permission in the terms requested.