



'Glebe House', Creeting St Peter, Ipswich,
Suffolk, IP6 8QR

Application Supporting Statement

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Appendices

**Appendix 1 Schedule of Existing Longcroft Cat Hotels
(as at February 2024)**

1. INTRODUCTION AND BACKGROUND

- 1.1. This Statement has been produced by Abi Purser, the founder of Longcroft Luxury Cat hotels, with the help of planning consultants, in support of an application for planning permission to install a building to provide short-term boarding accommodation for cats. The boarding accommodation will be a commercial activity (probably 'sui generis') and will only be ancillary to the existing residential use.
- 1.2. Attached as **Appendix 1** to this Statement is a schedule of the existing Longcroft cat hotels currently operating in the UK.
- 1.3. The following Statement identifies and appraises the relevant planning issues and in particular:
 - Explains the nature of the proposal;
 - Sets out the national and local planning policy context for the proposal; and
 - Identifies and appraises relevant planning issues.
- 1.4. Finally, the conclusions present a brief review of the content of this Statement in support of the case.

2. ABOUT THE APPLICANT AND THE EVOLUTION OF THE CONCEPT

- 2.1. The Longcroft Luxury Cat Hotel has provided a low-key, high quality, niche service for cat owners requiring short-term accommodation for their cats since 2010. Longcroft hotels are well known for being sited within residential environments (although one is also located in a rural location). Longcroft serves those not wishing to use large scale commercial catteries, which generally cater for large numbers of cats in small environments. The accommodation in a Longcroft hotel is designed to cater for small numbers of cats, but offering more space. Longcroft hotels are expertly and efficiently maintained and all consumables used are the very best available. The cat hotel building itself is made by a specialist manufacturer (to a similar type to those used by animal welfare charities) and is made from impervious and durable materials that do not deteriorate over time, or harbour odours. This again differs from the conventional cattery model which tends to generate much greater activity and use timber partitioning, which deteriorates through its occupation and retains odours.
- 2.2. Longcroft Luxury Cat Hotel is a successful and proven business model that has been offered as a partnership scheme since April 2012 (Hotel owners are known as 'Longcroft Partners'). The benefit for Longcroft Partners is that it allows them to work flexibly from their own home to supplement their income, whilst providing an important and much needed service for local cat owners. The business is meticulously run to the highest standards of animal welfare. Longcroft HQ assures that all of their partners follow the same strict process and hygiene protocol to ensure the same high level of care and cleanliness is upheld in every location. This is further strengthened by a binding contract between Longcroft HQ and the Longcroft partner.
- 2.3. The first Cat Hotel (which is still in operation) opened in June 2010 in

the Welwyn Garden City Conservation Area at 23 Longcroft Lane and the concept won a 'Smarta 100 Business' award in 2012 (it has since won other awards, including the Guardian's 2016 Small Business Showcase Award for 'Home Business') and more recently 'Best Place to Work' at The Red Ribbon Awards.. In determining the planning application for our first hotel (reference W6/2009/88/EM), the officer stated:

"...the proposed development does not have an unacceptable harmful impact on the amenities of the area".

- 2.4. Similarly, the planning officer in the case of the second of Longcroft's applications, this time within the urban area of St Albans (reference 5/2011/2931), granted planning permission because it was found that the proposed development would be *"compatible with the character of the locality... [and therefore there was].....no adverse impact on neighbouring properties"*.
- 2.5. Since then, the Longcroft concept has been widely accepted by local authorities elsewhere in the country and after the initial Welwyn Garden City outlet opened, a large number of further permissions have been granted for Longcroft hotels up and down the UK. For ease of reference, we have scheduled these at **Appendix 1** to this statement. Every location is operating well, The list now includes a second cat hotel within Welwyn Garden City, which opened off the back of the impeccable service given from the original cat hotel opened in 2010.
- 2.6. Apart from the Welwyn Garden City outlet mentioned above, a number of the other hotels mentioned in **Appendix 1** are in locations which would be considered sensitive in relation to the natural or built environment. For example, Letchworth is in a Conservation Area (this outlet also required 'heritage approval' from the Letchworth Garden City Heritage Foundation, in addition to the usual planning

permission from the Local Planning Authority), or Winchmore Hill. The latter outlet is also sited within the Green Belt, the Chilterns' Area of Outstanding Natural Beauty (AONB) and the cat hotel structure itself is only 14 metres away from a listed building (Longcroft's hotel at School Lane, Sheffield also adjoins a listed building). In granting a 'trial' temporary permission at Winchmore Hill (Chiltern District Council Application Reference CH/2013/1737/FA) the planning officer said:

"...the applicant has proposed to remove an existing outbuilding of a comparable size to that proposed. The applicant also makes reference to the NPPF in relation to promoting sustainable economic growth. This is also reflected in the adopted Development Plan policies with Core Strategy Policy CS19 stating that the Council will seek to develop a sustainable rural economy by encouraging working from home. Taking all of this into account it is considered that in this instance there are very special circumstances sufficient to outweigh the harm by reason of inappropriateness" (this temporary permission was subsequently made permanent under the terms of Application Reference CH/2016/0054/FA, as the Council found that the activity was not causing any issues with local amenity or traffic).

- 2.7. The Planning Officers made similar comment in the analysis of the Company's proposal at Flamstead in Dacorum Borough Council area (application reference 4/03474/15/FUL) and in recommending that planning permission be granted, stated:

"Such a stance has been reinforced by the Strategic Planning Policy Officer consulted on the proposed; the follow comments were provided: "The proposal is considered to be acceptable in principle on the basis that it falls within one of the exceptions for small-scale development identified in Core Strategy Policy CS6". Thus, it is considered that the use of the outbuilding for business use as a cat hotel would fall within the acceptable criteria F, and would constitute an appropriate use and development within this Green Belt village".

- 2.8. Comparable comment about the cat hotel's acceptability, even when in the Green Belt, was made by the Planning Officer at St Albans City

& District Council recently when considering the Longcroft proposal at St Albans Road, Sandridge (Application Reference No: 5/21/0323).

The officer said (at pages 5 & 6 of her report):

“.....the size of the cattery building would be considered of a domestic scale and would essentially be of a size that would, if used ancillary to the main dwelling, come under permitted development, with a maximum height of 2.45m.

Additionally, the site is within a row of semi-detached dwellings, many of which have outbuildings, similar in size and scale to that proposed in this application, which are located towards the rear of the amenity space. The outbuilding proposed would appear in size, scale and character as surrounding outbuildings. Furthermore, views from the green belt from the rear would improve given that the cattery building will be located slightly further into the site with the loss of the garage that is located closer to the access to the rear”.

2.9. In the Sandridge case, existing outbuildings were being removed as part of the proposal, but in combination with *“the size and scale of the building.....this would amount to very special circumstances to allow the development and would not result in harm to the openness and character of the green belt”.*

2.10. As mentioned, some of the franchises are also in the open countryside, such as that at Liphook (which is within the scope of the South Downs National Park Authority; ‘SDNPA’); Braintree; or the operator’s former outlet at Royston. Again, there has never been any issue with operating the Longcroft concept as a ‘rural business’. In the assessment of the Longcroft proposal at Liphook (application ref: SDNP 17/003314/FUL), the officer at the SDNPA commented:

“As such, the proposal is considered to be sustainable development, where development should be supported and no adverse harm would result from the proposal with regards to the impact on the area, neighbouring amenity and highway and parking considerations. Also, the proposal is considered to accord with the purposes of the South Downs National Park. Therefore, the application [is] recommended for approval subject to conditions”.

2.11. Similarly, planning permission was granted, on the 10th January 2020, for a Longcroft outlet upon land designated as open countryside, and outside any designated settlement boundaries, at Lockerley near Romsey under Test Valley District Council (TVDA), ref 19/02823/FULLS, where the officer found (at paragraph 8.9 of the delegated report):

"...it is considered that the proposal satisfies all of the relevant criterion [sic] of Policy LE16 and therefore, the principle of development is acceptable and in accordance with Policy COM2".

2.12. In the event that the cat hotel is close to other residential property, there is again no issue with amenity. For instance, on 29th March 2017, the London Borough of Croydon granted permission for a cat hotel at 157 Green Lane, Norbury (Application Number: 17/00466/FUL). The case officer found the use itself to be *"acceptable in principle"*. Likewise, the *"design and in particular the materials chosen"* were acceptable and the proposal was also found to have no *"detrimental effect on the amenity of adjacent properties"*. Furthermore, *"given the small scale of the business and the limited opening hours for dropping off and collection"*, there was no issue in relation to highways.

2.13. Notwithstanding that residential amenity has never been an issue, with any of the cat hotels that we operate, the Applicant commissioned an assessment of its first Welwyn Garden City outlet by a specialist acoustic engineer..

2.14. On occasions, the matter of drainage and flood risk has been raised in connection with assessing the acceptability of Longcroft's applications. As the officer said in the Longcroft case at Green Lane (Application Number: 17/00466/FUL), referred to above:

"Given the scale of development it is not considered to negatively impact on flood issues within the area. However, it is considered that a sustainable drainage method system should

be incorporated within the development for harvesting of rain water run-off from the roof". A condition to this effect was attached to the permission.

2.15. Finally, it should be mentioned that no dogs are ever boarded at a Longcroft Luxury Cat Hotel. Many conventional catteries also have kennelling for dogs, which may have different effects upon the amenity of a residential area.

2.16. **Working With Charities** - Longcroft strongly supports local charities and if a volunteer place became available this is something that would be considered and only on consent by the local authority.

3. THE NEED FOR THIS FACILITY

- 3.1. **The National Position** - According to the Pet Food Manufacturers Association, PFMA, (<https://www.ukpetfood.org/information-centre/statistics/uk-pet-population.html>), as of 2023, there is currently estimated to be a population of about 11 million cats in this country, equating to about 26% of households (in 2019/20, pre-lock-down, the ownership figure was estimated at 7.5 million by the PFMA), yet there are only some 2,000 catteries. Of these existing facilities, many tend to be old, poorly maintained, and built from unsuitable materials such as timber, which are not easy to keep clean because they harbour bacteria. When they go away, responsible owners of cats want to be able to leave their cat where they are confident that it will be looked after properly, in the type of conditions that it is used to at its usual home.
- 3.2. To help deal with the issue of existing quality, more stringent licensing laws were introduced by the Government in October 2018 and whilst this is a positive measure in relation to animal welfare, it has had a further impact upon the availability of provision. As noted above, much of the existing cattery provision does not, and for various reasons cannot, comply with these regulations and so have been forced to close, further reducing the supply of accommodation.
- 3.3. Abi Purser, the originator of the cat hotel concept who still owns and runs the first hotel opened in Longcroft Lane Welwyn Garden City noted the mismatch between the unserved demand and existing provision and began to fill this gap in 2010. The Longcroft concept is helping to fulfil this need, as the majority of the business for each of the existing cat hotels comes from repeat bookings and typically a cat owner will use the cat hotel about 4 times a year. As a result, the customer base is relatively small, and becomes known to the Longcroft Partners very quickly. As mentioned above, such has been

the local demand for this service already using Longcroft's existing Welwyn Garden City hotel, that a further Longcroft Luxury Cat Hotel close by was required and so planning permission was granted and the hotel built.

- 3.4. As noted, the cattery industry has seen an enormous and recent surge in demand, largely because cat ownership rose by some 4 million just during the Pandemic. Additionally, because travel was prohibited during this time a huge number of catteries closed as their revenue was non-existent (the industry did not fall into the wider and more financially supported categories of hospitality or retail. Now that travel is permitted once more, the demand for the remaining cattery spaces is likely to be higher than ever.
- 3.5. Attached to these submissions is a letter from the Pet Industry Federation (PIF), the regulatory body for our industry, concerning the increased need for our services to meet the quantitative and qualitative shortfalls in supply.
- 3.6. **The Local Position** - According to research, carried out by the PFMA, the average percentage of the UK's households owning a cat in 2023 was estimated to be about 26% (see above). The Office for National Statistics (ONS), found that Mid-Suffolk's population size has increased by 6.2%, from around 96,700 at time of the previous Census in 2011 to around 102,700 by the most recent one in 2021 (source: Mid Suffolk 'State of the District Report 2023' www.babergh.gov.uk/documents/d/mid-suffolk/mid-suffolk-state-of-the-district-2023). In respect of households with at least one usual resident, there were estimated to be 44,300 in Mid Suffolk District in 2021, which was an increase of 4,000 households since 2011 (approximately 9.9%). According to the 'State of the District' document, *"Household numbers are expected to increase further by around 18% by 2043 (compared with around 13% across Suffolk)"*.

Although the area is one of the least deprived nationally, the State of the District does state (on page 4) that *“as a mainly rural district, Mid Suffolk faces a number of geographical barriers related to the physical proximity of local services and employment centres”*.

- 3.7. Using the PFMA’s survey figures, in the context of the 2021 Census figure for households, suggests that there could be in the order of 11,500 households within the District that own at least one cat (many households have more than one). Thus, as the District’s overall population increases, the demand for short term cattery accommodation is also likely to increase.
- 3.8. It can be seen that there is considerable potential demand for facilities to accommodate cats in the locality and there is currently no facility in the immediate locality at all (the nearest being over 6 miles away). Furthermore, even when there may already be catteries in an area, these facilities may not always have availability (they may be fully booked during holiday periods), or in some cases may not be directly comparable in terms of quality or convenience. In addition, very often many of these facilities also operate as kennels for dogs, which is not an ideal environment for most cats.

4. THE APPLICATION PROPERTY

- 4.1. **The Application Property** ‘Glebe House’ in Creeting St Peter, is a part one and part two-storey detached house, situated at the end of a no through road, known as The Lane. The house is relatively modern (from the particulars of its recent sale, we understand that it dates from 1963). The house sits in a large plot and to its front (accessed from its long drive), there is an integral garage. There is also a large area of hardstanding at the front of the house, which can serve for additional parking. The house adjoins open fields to its east; an area of paddock to the south; and the residential properties known as ‘The Rowlings’ to the immediate north and ‘Homecote’ to its north west. Along the length of its boundaries there is dense landscaping in the form of a mature hedging and trees.
- 4.2. **Planning History** – the Council’s on-line database records two planning applications against this property, or its garden land. In both cases there are no documents available, as follows:
- **Ref. No: 0367/89** – *“Severance of part of garden for the erection of one dwelling using existing vehicular access. (submission of details under outline planning permission OL/409/87)”*. Refused 16th June 1989. Appeal allowed.
 - **Ref. No: 0149/95** – *“Erection of dwelling and integral garage using existing vehicular access”*. Application withdrawn 5th April 1995.
- 4.3. **The Surrounding Area** – the site is about 3 kms away, from shopping facilities such as the ‘Tesco’. The town of Stowmarket’s centre is about 5kms away from the site, via the A14. There are no public transport services serving the village of Creeting St Peter.
- 4.4. **Heritage Assets** – there are no heritage assets in the immediate vicinity and the land is not in a Conservation Area.
- 4.5. **Tree Preservation Orders (TPOs)** – there are no TPOs upon the site.

4.6. **Flood Risk** – According to the Government’s website ‘Check the long term flood risk for an area in England’ (<https://check-long-term-flood-risk.service.gov.uk/risk#>) “the area around Glebe House, Creeting St. Peter, Ipswich, IP6 8QR has a”

- *very low risk of surface water flooding*
- *very low risk of flooding from rivers and the sea”.*

5. THE PROPOSAL

- 5.1. The following section outlines the operational elements of the proposed facility in relation to matters such as staffing, and other development management matters including highways and residential amenity. Following the current AAL guidelines the proposed building is capable of housing up to 16 cats within the 8 room hotel. The overall level of the investment into the local economy is around £50,000. Longcroft always favours local gardeners, builders and electricians to complete each build, further contributing to the local economy.
- 5.2. It should be noted that since Longcroft Luxury Cat Hotels was founded in 2010. There are now over 25 Longcroft hotels in operation (see **Appendix 1**), with most being located within residential areas or, at the very least, close to other housing.
- 5.3. **Description of the building** - The cat hotel building will be sited in the property's garden, at the side of the house It is manufactured to Longcroft's strict specification which is one of the highest quality available (it is similar in type to those used by Cat's Protection and Blue Cross). It also offers excellent insulation properties from noise, even when entering and exiting the sleeping areas. It is manufactured from uPVC, comprising glass panels and has a fully insulated and heat reflective polycarbonate roof (specific details of the building's internal specification can be made available to EHO's if needed). The door frames are again uPVC, with galvanised safety mesh in the centre. The new structure is to be sited in the house's front garden. However, the existing mature landscaping should screen it from public view.
- 5.4. Each cat hotel building's dimensions are similar to the type of domestic outbuilding, which could normally be permitted

development under Class E of the Town & Country Planning (General Permitted Development) (England) Order, or GPDO. The proposed height of the **unit is 2616mm at the front and 2203mm to the rear**, which allows space for the cats to climb and exercise. The base of the proposed structure is to be of concrete and measures **4340mm in depth, with a length of 13310mm (or about 57m² in area)**.

- 5.5. Low energy lamps with diffusers offering low night light in the sleeping areas and low energy lamps in the safety corridor with prism diffusers are used. Lighting is switched off in the evening in order to respect neighbouring residents. There is no external lighting. In the interests of Animal Welfare each room comprises a thermostatically controlled sleeping area. The flooring will be an impervious floor and grout system for state of the art, hygienic cleaning.
- 5.6. All cat furniture is bespoke, antimicrobial and hygienic. Longcroft further supports local tradespeople to achieve this. Longcroft insist on an attractive wooden pergola to be added to the exterior of each building, further softened by natural plants and seasonal hanging baskets regularly supplied by local gardeners.
- 5.7. **Duration of stay** - Typically the average stay is ten days. However, it has been known for customers to leave their cats for longer periods during a working trip abroad or a house renovation. On average, a customer uses the Longcroft hotel about 4 times a year.
- 5.8. **Hours of operation** - Customers at the property are only allowed to arrive on an appointment-only basis between the working hours of 9 am - 5.00pm. No one arrives without a prior appointment. Longcroft does not permit visits on a Sunday, or on any Bank Holidays.
- 5.9. **Vehicular Turnover** - Longcroft's vehicular activity is very low due to the appointment-only system put in place and Longcroft's niche

clientele attracted. The Applicant has established that even over the busiest periods, there was an average of one car per day stopping for ten minutes at a time whilst customers settled their pets in and out.

5.10. Due to the small scale of the operation, there is no need for specialist deliveries, in fact supplies are sourced as part of the normal domestic shopping trip.

5.11. **Staffing** - Due to the small scale of the operation, no staff are needed.

5.12. **Noise** - Longcroft has proven that cats are very quiet creatures staying away from home, when given the respect and care they deserve in a Longcroft hotel. We must also mention the materials used for our buildings are very effective in noise reduction, utilising 400mm UPVC Polystyrene core board with Argan K Glass double glazing. The buildings exceed all Chartered Institute of Environmental Health (CIEH) guidelines and are made of impervious construction throughout.

5.13. **Hygiene** - Cats are very clean animals and due to the fact that this is a premium service, cleaning procedures are detailed and consistent. The hygiene protocols are devised by Longcroft's head vet. Most importantly there is never any sluicing, run off or surface water created. Hosing of floors in Longcroft Hotels is not necessary, ensuring no waste water is created and no additional drainage is required. Temporary isolation facilities can be provided if required. In addition, all guests at Longcroft are fully vaccinated and proof of vaccination is a conditional term of booking. Worming and flea treatments are also strongly recommended for each guest.

5.14. **Odour** - The impervious construction and cleanliness regime does not allow odour to form. Furthermore, Longcroft uses a cat litter,

which neutralises smells and limits waste.

- 5.15. **Waste Disposal** - Due to the small size of Longcroft hotels and state of the art cat litter used, the waste produced is negligible. Longcroft does not store cat hotel waste with general household waste. Any waste is disposed of regularly, is triple bagged and stored in a closed bin until it is collected by the dedicated waste carrier.

6. PLANNING POLICY AND GUIDANCE

NATIONAL POLICY

- 6.1. This section reviews and identifies relevant guidance and policy from both the national level and the 'Development Plan'. National Government guidance is now presented in the National Planning Policy Framework, or NPPF, of December 2023. Furthermore, the many ministerial statements (including the various statements which have accompanied the Budgets) and the HM Treasury's 'Plan for Growth' are also material considerations. The following are of relevance to this application.

NPPF

- 6.2. The NPPF reiterates that applications should be determined in accordance with the 'Development Plan', which forms the *"starting point for decision making.....unless material considerations indicate otherwise"*. The NPPF states that it (and other statements of Government policy), is *"a material consideration in planning decisions"* (NPPF, paragraphs such as 2, 3, 12 & 47).
- 6.3. According to paragraphs 7 & 8 of the NPPF, *"the purpose of the planning system is to contribute to the achievement of sustainable development"* and there are three interdependent *"overarching objectives....[that]...need to be pursued in mutually supportive ways"*. These objectives are 'economic', 'social' and 'environmental'. A *"strong, responsive and competitive economy"* is encouraged and the planning system should *"support growth, innovation and improved productivity"*. At the same time *"to support strong, vibrant and healthy communities"*, with the *"current and future needs"* for *"health, social and cultural well-being"* being met. This must be done in a way that ensures that the *"natural, built and historic environment"* is protected and that land is used effectively. Making the most effective use of land and buildings that have already been developed

is also a feature of Chapter 11 of the NPPF. Paragraphs such as 124 and 127 support the reuse and/or redevelopment of previously utilised land and buildings to meet development needs.

- 6.4. *“A positive and creative”* approach to decision-taking is urged (Local planning authorities *“should seek to approve applications for sustainable development where possible”* (see NPPF, paragraph 10 & Chapter 4, paragraph 38).
- 6.5. The Treasury’s ‘Plan for Growth’ of 2012 and the various statements which have accompanied the Budgets of the subsequent years, underpin policy such as the NPPF and state that the default answer to applications should be ‘yes’. There should be a positive attitude towards all development which generates wealth and creates employment. NPPF paragraph 85, within Chapter 6 (entitled *“Building a strong, competitive economy”*), also exhorts a positive approach to supporting economic growth and planning *“decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development”*. Paragraph 86 continues that the planning system must *“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”*.
- 6.6. *“Supporting a prosperous rural economy”* is given a particular focus in the NPPF, with paragraph 88 stating that planning *“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, beautiful new buildings;*
 - b) *the development and diversification of agricultural and other*

land-based rural businesses;

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

6.7. In rural areas the NPPF says, at paragraph 89, that:

planning “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)....”.

6.8. Also, on the matter of transport and new development, paragraph 109 of the NPPF recognises:

“opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making”.

6.9. The NPPF also goes on to say 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” (NPPF, paragraph 115).

6.10. According to paragraphs such as 97 (within the NPPF Chapter headed *“Promoting healthy and safe communities”*), in order *“to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should [amongst other things]:*

a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;

b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.....

e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services”.

6.11. More generally, according to the NPPF, good design and “*the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve*”. Planning decisions should ensure that development “*will function well*”, whilst being sympathetic to its surroundings (NPPF, paragraphs such as 131 & 135 and throughout Chapter 12 “*Achieving Well-Designed Places*”).

6.12. Government policy generally seeks to protect the built environment from increased flood risk from all sources and to direct new development away from sites and areas which might be at enhanced risk. LPAs should also ensure that allowing new development does not increase the risk of flood elsewhere (see NPPF paragraphs such as 165 & 173).

LOCAL PLANNING POLICY

The Development Plan

6.13. For the purposes of this application, the current adopted ‘Development Plan’ for this part of the District comprises the:

- ‘Babergh and Mid Suffolk Joint Local Plan- Part 1’ adopted 2023 (JLP) – the Policies Map shows the land as outside the main settlement boundaries, within the rural area and there are no designations shown for the subject site. The land is in the ‘High Zone’ for residential developments in connection with the Community Infrastructure Levy (CIL), although the subject development is not liable for CIL.

6.14. The JLP Policies which could be relevant in this case are listed

below:

SP03	<i>“The sustainable location of new development”</i>
SP05	<i>“Employment Land”</i>
SP09	<i>“Enhancement and Management of the Environment</i>
SP10	<i>“Climate Change</i>
Policy LP09	<i>“Supporting A Prosperous Economy”</i>
Policy LP15	<i>“Environmental Protection and Conservation</i>
Policy LP16	<i>“Biodiversity & Geodiversity</i>
Policy LP17	<i>“Landscape</i>
Policy LP23	<i>“Sustainable Construction and Design”</i>
Policy LP24	<i>“Design and Residential Amenity”</i>
Policy LP26	<i>“Water resources and infrastructure”</i>
Policy LP28 -	<i>“Services and Facilities Within the Community”</i>
Policy LP29	<i>“Safe, Sustainable and Active Transport”</i>

6.15. There is also a Supplementary Planning Document relating to car parking: The *“Suffolk Guidance for Parking - Technical Guidance”* (‘SGP-3rd’), Third Edition adopted May 2019. The SGP-3rd does not include a car parking standard for the subject form of development proposed in this case.

7. PLANNING ISSUES

General Policy Background

- 7.1. The NPPF reiterates that applications should be determined in accordance with the 'Development Plan', which forms the *"starting point for decision making.....unless material considerations indicate otherwise"*. Government statements of planning policy are one such consideration relevant to the determination of applications (see NPPF, paragraphs such as 2, 3, 12 & 47). The Planning System should take a *"positive and creative"* approach to decision-making and *"should seek to approve applications for sustainable development where possible"* (see NPPF, paragraphs 10 & 38).
- 7.2. The application proposal will provide a key service to cat owners. According to paragraphs 7 & 8 of the NPPF, it is part of the 'social role' of planning to support *"strong, vibrant and healthy communities.....with accessible services....that reflect current and future needs and support communities' health, social and cultural well-being"*. Paragraphs 93 & 97 of the NPPF require that in order *"to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should....plan positively"* for the provision of community facilities and take an *"integrated approach"*. Making the most effective use of land and buildings that have already been developed is a key feature of Chapter 11 of the NPPF (see in particular paragraphs such as 124 and 127).
- 7.3. According to the 'Development Plan', generally new development is to be directed towards the larger centres, as well as the existing built-up areas, as these are considered to be the most sustainable locations. Wherever possible, development should make use of existing developed land within the urban area; protect residential amenity; whilst reducing the need to travel. Generally, new community services are supported provided that the proposals are

accessible to the users. When the proposal is outside the main settlement boundaries the local need and its wider benefits must be demonstrated (see JLP **Policies** such as **SP03 & LP28**).

- 7.4. As noted earlier in this submission, in the case of the Applicant's application at Green Lane, Norbury in the London Borough of Croydon (see paragraph 2.10 of this Statement), the case officer found the proposed land use to be "*acceptable in principle*". Equally, the long list of successful cases at **Appendix 1**, all demonstrate that many other planning officers have reached the same conclusion.

Need

- 7.5. According to the PFMA Cat ownership has risen considerably in the last few years, but this increase has not been matched by commensurate increases in the provision of short-term accommodation. There has long been a severe shortfall of provision for cats in the country as a whole; a supply situation that has worsened due to the introduction of more stringent licensing controls since October 2018. The problems have since been further compounded by the impact of the Pandemic, which shut off the revenue stream for two years. As a result, many catteries went out of business and have been unable to reopen despite the release of lock-down restrictions.
- 7.6. Because of this limited choice, the accommodation that there is, may often be over-subscribed, even if its quality is indifferent, or poor (some also provide accommodation for dogs, which is not the most suitable environment for cats). It is clear from the Applicant's direct experience that the local catchment needs this additional provision.
- 7.7. Despite the quantitative and qualitative need, there is no provision of short stay cat accommodation in the immediate vicinity and the nearest comparable facilities are some miles away. There is support

in the NPPF for proposals that help meet identified local deficiencies in the facilities that the community needs (see for instance paragraphs such as 97). Likewise, according to the 'Development Plan', when outside the scope of the defined settlements a proposal for a new service has to demonstrate that there is need and that there would be benefits accruing to the users. The Mid-Suffolk 'Statement of the District Report' also notes an ongoing issue with access to many forms of local services for the population, due to the rural nature of the District.

Sustainable Economic Investment

- 7.8. Overall, it can be seen from national planning policy in the NPPF, as well as the Treasury's 'Plan for Growth' (and the various Statements that have accompanied the Budgets in subsequent times, which underpin the policies in the NPPF and which state that the default answer to applications should be 'yes'), that there should be a positive attitude towards all development which generates wealth, encourages businesses to invest, creates employment and makes effective use of land. *"Building a strong, competitive economy"* is specifically supported by the NPPF, and planning *"decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development"*. *"Supporting a prosperous rural economy"* is given a particular focus in the NPPF, with decisions giving support to *"all types of business in rural areas.....[including]...development of accessible local services and community facilities"*. In all locations, policies should promote *"new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances"* (see for instance NPPF, paragraphs 2, 3, 7,

8, 12, 47, 85, 86 & 88).

7.9. Likewise, in terms of the JLP, **SP05** & **Policy LP09** (“*Employment Land*” & “*Supporting a Prosperous Economy*” respectively), gives support to many forms of employment development including measures to assist home working, provided that various criteria are met, such as:

“a. There are no direct sales from the site;

b. The direct and indirect effects of the scale of the business activity, including the employment of non-residents at the business, must remain incidental to the overall use of the site for residential purposes;

c. The hours of operation are compatible with residential use; and

d. The business does not create noise, dust, fumes or other emissions, outdoor storage or frequent delivery/collection that are likely to give rise to significant adverse impacts on health, quality of life or local amenity”.

7.10. In relation to those policy criteria, we comment that:

a. There will be no sales from the building (the business operates a strict booking policy, as explained in Section 5);

b. the scale of the business will remain incidental to the house and there will be no outside staff employed;

c. the hours of operation are entirely compatible with residential areas; and

d. there will be no harm to amenity from deliveries or noise (see Section 5 of this statement and the discussion below).

7.11. The subject proposal involves investment into the application premises (amounting to more than £50,000) by an award-winning small business and will enable the integration of flexible working practices as the NPPF encourages. In this case there are no employees coming to the site and the activity will enable the resident

to derive an income from home-working. Longcroft has a policy that, wherever possible, local suppliers are used to complete each build, so there is further investment into the local economy. Under the terms of Government policy for encouraging economic investment, as well as the Council initiatives to promote 'small business' employment opportunities and enterprise, the application should therefore have support.

- 7.12. The subject use itself has already been accepted as appropriate to both urban and rural locations by many LPAs in the past, even those with development plan policies of strong restraint (see **Appendix 1**).

8. OTHER DEVELOPMENT CONTROL MATTERS

- 8.1. **Transportation & Parking** – Whilst, there is a general direction in most planning policy towards directing new services towards existing settlements, where a variety of sustainable travel modes might be available, there can be exceptions. At paragraph 89, the NPPF states planning *“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”* (the reference to differing opportunities to access public transport in some rural areas is also referred to at NPPF, paragraph 109). The NPPF is also clear, at paragraph 115, 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”* (our underlining).
- 8.2. The ‘Development Plan’, also seeks to direct development towards the settlements , however, it is again accepted that facilities that serve rural needs can sometimes be sited in the rural area. Otherwise, access to development should be safe for all users; there should be no impact on any adjoining rights of way; and the levels of traffic generated from the use should be appropriate to surrounding roads (see JLP **SP03 & Policy LP29** *“Safe, Sustainable and Active Transport”*).
- 8.3. According to these ‘Development Plan’ policies, thought should be given to access and layout matters, such as parking provision at planning stage. Car parking should be suitable for the proposed development with the standards in the ‘SGP-3rd’ being used for provision. However, there are no specific parking standards for catteries set out in SGP-3rd, leaving planning applications to be determined on a case-by-case basis.

- 8.4. As explained above (and has been accepted by numerous Councils around the country), the traffic generation arising from, and parking requirements of, the proposed activity are minimal and customers only make occasional visits, to pick-up or drop-off, of about 10 minutes' duration. This level of visitation is no different from normal domestic use and so will have no impact upon the road network. The subject dwelling already has plenty of off-street parking upon the hard surfaced driveway (which would serve for the staff occupant, with the opportunity for a further short-term customer parking space as well.
- 8.5. Although the promotion of alternative means of travel is generally promoted at all levels of planning policy and the 'SGP-3rd' would normally require cycle parking in association with new employment uses, this would not be of any practical assistance to Longcroft customers, when transporting animals.
- 8.6. Finally, there are no other deliveries associated with the activity, as items needed for the business are bought by the operator as part of the normal domestic shopping trip.
- 8.7. Therefore, the proposal should be acceptable under the terms of the 'Development Plan', and NPPF, as there is no traffic issue and therefore no reason to oppose the proposal upon its transportation effects.
- 8.8. **Design** –As stated above, Longcroft cat hotels have been found to be acceptable in numerous previous cases, even where heritage and landscape sensitivity were considerations (see schedule at **Appendix 1**). This even includes the most sensitive locations, such as: conservation areas; adjoining listed buildings (in the case of the Applicant's hotel at Winchmore Hill the structure was only 14 metres away from the listed building, as well as within the Chilterns' AONB);

the South Downs National Park; the Green Belt; as well as the open countryside. As can be seen, a rural location has never proved to be an obstacle to securing permission for a Longcroft outlet.

- 8.9. Good design and *“creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve”* (NPPF, paragraph 131). However, paragraph 135 of the NPPF says that good design goes beyond just aesthetic considerations of a building’s appearance, but also includes their ‘function’. The ‘Development Plan’ (see JLP **Policies** such as **LP15** *“Environmental Protection and Conservation”*; **LP23** *“Sustainable Construction and Design”* & **LP26** *“Water resources and infrastructure”*) also require the design of all new buildings to respect their context and surroundings, in relation to elements such as sustainability, height, scale, form, materials and waste management and to make efficient use of land and other resources (including water).
- 8.10. The method of operation for a Longcroft cat hotel, including water use and waste management arrangements have been explained in Section 5 above. The proposed building has been designed by a specialist manufacturer to provide maintenance free, high quality accommodation that is mindful of animal welfare (and is of a type also used by animal protection charities). This means that the building has to have sufficient height to enable the cats to climb and exercise. In addition to considerations of animal welfare, Longcroft’s usual design parameters, such as dimensions and the materials used, are comparable with conventional domestic outbuildings (there were no restrictions imposed upon outbuildings in the original outline planning permission for this house). For instance, the case officer in the previously mentioned Green Lane, Norbury application also *“considered that the design and in particular the materials chosen*

would be acceptable” and noted that the requirements of the Council’s various design policies were met.

8.11. The NPPF and Development Plan policy (such as JLP **Policies SP10 & LP23**) also require thought to be given to the energy performance, as well as the longevity and sustainability of the materials used in the construction. The uPVC (which is regularly used in domestic situations) is not only heat efficient, it also provides a much better environment for cats than timber, which is more traditionally used by established catteries. Unlike uPVC, timber does not endure well: it deteriorates quickly when exposed to the elements; is degraded through the cats scratching; is less hygienic, because it is prone to retaining odours; and more difficult to clean than uPVC. Furthermore, the fact that the structure used at the St Albans cat hotel since 2011 could be relocated to Sandridge and reassembled, nearly 10 years later, is a testament to the quality and durability of the materials Longcroft uses. As for lighting, low energy lamps with diffusers are to be used throughout the structure.

8.12. **Trees, Landscape & Biodiversity** - There are no TPOs on the subject site and there will be no loss of trees or hedges, arising as a consequence of this proposal. In this specific case the development is to be sited within the garden at the rear of the house and the new structure will not be visible from outside the site because of the secluded nature of the site and the strong belts of mature landscaping upon all of its boundaries. Thus, the terms of the ‘Development Plan’ (see for instance JLP **Policy LP17 “Landscape”**) are satisfied in relation to landscaping and retention of hedges and trees.

8.13. JLP **Policies** such as **SP09 “Enhancement and Management of the Environment”**; **LP15 “Environmental Protection and Conservation”**; & **LP16 “Biodiversity & Geodiversity”** all seek to protect the natural

environment and ensure that there is no adverse effect upon biodiversity. The subject proposal does not lead to any increase population levels and furthermore, the cats are kept within their rooms for their entire stay and so will not have an impact upon local biodiversity.

- 8.14. **Residential amenity** - There are now a number of Longcroft's franchises in operation across the country (see **Appendix 1** to this Statement), most of them within close proximity to other residential occupiers, and there has never been any complaint about their impact upon amenity. The few visits generated are only ever by appointment, during normal working hours and, as stated previously, there are no HGV deliveries.
- 8.15. In terms of the NPPF and the 'Development Plan' objectives and policies (such as JLP **Policy LP24** "*Design and Residential Amenity*"), which seek to protect residential amenity from elements such as external lighting, smells, waste disposal or noise, again there is no issue.
- 8.16. There is no external lighting and the low-level internal lighting (which is set at the minimum level operationally necessary anyway) is switched off late at night; odours are controlled by the use of uPVC which is easy to clean; the small amount of waste is to be disposed of by means of an appointed contractor; and the uPVC acts to screen out any noise from within the accommodation.
- 8.17. The case officers in the many other Longcroft cases (scheduled at **Appendix 1** to this Statement) have, likewise, agreed that there is no issue with compatibility with residential amenity. This lack of adverse impact was the key reason why Chiltern District Council was happy to accept making the 'trial permission' at Winchmore Hill into a permanent one a few years' later.

8.18. **Flood Risk** – the application land is not assessed as having an enhanced risk of flood from rivers (according to the Government’s current flood risk website, the land is in ‘Zone 1’, not ‘Zone 2’ as the Council’s website suggests), or from surface water. For both forms of flooding the Government categorises the subject land as ‘very low risk’.

9. SUMMARY AND CONCLUSIONS

9.1. In the light of the above we **summarise** the position as follows:

- This application relates to the installation of a new outbuilding to provide short-term boarding accommodation of 8 rooms for cats, from a location which is accessible to shops and services, as well as to the population being served.
- The subject land is outside the defined settlement boundaries in the District's rural area. Whilst normally investment is directed to the most accessible areas, new employment and improvements to services are also encouraged even when they are within the rural area.
- The site selected for the new cat hotel is not assessed as being at risk of flood from rivers or surface water and is at the rear of the dwelling. The proposed cat hotel will be well screened from public view by mature landscaping at the plot boundaries. No trees or hedges are lost as a consequence of this application and there is no impact upon biodiversity.
- The boarding accommodation will be a commercial activity, but will remain ancillary to the main use of the property as a dwelling. It will be operated by the house's current occupier. The Applicant is a successful company which has been rolling out its franchise across the country for over a decade.
- There are now an estimated 11 million cats in this country, yet only some 2,000 licensed catteries. As a result of regulations introduced in 2018 the number of existing facilities has declined further, as many of these existing outlets tended to be old, poorly maintained, and built from unsuitable materials (such as timber), which are difficult to maintain and keep clean. The recent Pandemic has exacerbated the problem with some catteries

having gone out of business and failed to reopen after the 'lock-down'.

- The wider mismatch between demand and supply (there are deficiencies in both quality and quantity) has long been noted by the Applicant Company and the operation was started. There are now a number of the Longcroft cat hotel facilities in operation across the country (see **Appendix 1** to this Statement), the planning authorities in each case concluding that the activity was compatible with the character of the area, even in the most sensitive locations (including within Conservation Areas, the Green Belt, National Parks/AONBs and the open countryside, as well as immediately adjoining listed buildings).
- The proposed cat hotel has the design attributes of a normal domestic outbuilding. Notwithstanding its 'domestic' appearance, the proposed building is of a type used by the RSPCA and Blue Cross and so meets high standards of animal welfare.
- As the new structure will be entirely screened from wider view, there is no harm to the setting of any heritage assets, or the wider landscape.
- Customer visitation will be only by appointment and during the hours of 9am - 5.30pm, Monday to Saturday. In terms of vehicle movements this equates to an average of one car per day stopping for ten minutes at a time. No outside staff members are employed, so there are no additional vehicle movements, or parking requirements and there are no deliveries.
- In terms of Central and Local Government policy, all development should consider the wider effect upon the core objective of achieving sustainability and according to the NPPF, the Planning System *"should seek to approve applications for sustainable*

development where possible” to facilitate this. Government policy seeks to promote the provision of new services in both urban and rural areas. Decision-making should be approached positively and rural enterprise (particularly that which enables flexibility and working from home, thereby reducing the need to travel); which introduces new investment; and which improves community services; should generally be supported (see throughout the NPPF and the ‘Development Plan’).

9.2. As a consequence of the above we **conclude**:

- The application will provide a much-needed local service and assist in meeting a qualitative and quantitative shortfall.
- The activity has been found acceptable in urban and rural locations (including those that would be considered to be highly ‘sensitive’).
- In terms of the *“powerful new presumption in favour of sustainable development so that the default answer to development is ‘yes’...”* (HM Treasury *“Plan for Growth”*), the proposal is clearly in accordance with Government policy promoting investment which generates wealth and employment.
- The proposal is also in accord with the aims and objectives of the NPPF, HM Treasury’s *“Plan for Growth”* and the local ‘Development Plan’, Therefore, it is requested that this application be **granted**.

Appendix 1

Schedule of Existing Longcroft Cat Hotels

Town	Address	When Opened
Welwyn Garden City	23 Longcroft Lane, Welwyn Garden City, Hertfordshire AL8 6EB	June 2010
St Albans	38 Longacres, St Albans, Hertfordshire AL4 0DR (*)	April 2012
Winchmore Hill	Redcot, Whielden Lane, Winchmore Hill, Amersham, Buckinghamshire HP7 0NQ	March 2014
Fontwell	Fairacres, Level Mare Lane, Eastergate, Chichester, West Sussex PO20 3SA	September 2014
Pamber Heath	2 Church Road, Pamber Heath, Hampshire RG26 3DP	October 2014
Braintree	217 Church Street, Bocking, Braintree, Essex, CM7 5LH	March 2015
Southport	23 Shaws Road, Birkdale, Southport, PR8 4LP	April 2015
Luton	12 Corncrake Close Luton Bedfordshire LU2 8EL	December 2015
Cole Green		March

	73 Great Ganett, Welwyn, HERTS, AL7 3DB	2016
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Romford	35 Hamlet Road, Romford, RM5 2DS	June 2016
Margate	18 Gresham Avenue, Westbrook, Margate CT9 5EH	May 2017
Norbury	157 Green Lane, Norbury, Greater London, NW16 3NA	July 2017
Barnet	64 Haslemere Avenue, East Barnet, London, EN4 8EU	July 2017
Liphook	78 Portsmouth Road, Liphook, GU30 7EF	December 2017
Croydon	36 Valley Road, Kenley, Greater London CR8 5BQ	June 2018
Letchworth	13 Field Lane, Letchworth, HERTS, SG6 3LF	March 2018
Chelmsford	32 Hill Road, Chelmsford, Essex, CM2 6HW	April 2018
Barry Island	54 Redbrink Crescent, Barry Island, Vale of Glamorgan, Wales, CF62 5TU	July 2018
Cuffley	33 Brookside Crescent, Cuffley, Hertfordshire, EN6 4QW	July 2018
Orpington	9 Forest Way, Orpington, BR5 2AG	July 2019
Sheffield	28a School Green Lane, Sheffield, S10 4GQ	August 2019

Flitwick	46 Osprey Road, Flitwick, Bedford MK45 1RU	January 2020
Tring	46 Nathaniel Walk, Tring, Hertfordshire, HP23 5DG	March 2020
Romsey	Pains Hill, New Barn Farm House, Romsey SO51 0JE	May 2020
Banbury	The Burrow, Merestone, Marston St Lawrence, Banbury OX17 2DB	December 2020
Bury St Edmunds	Parkfield, Drinkstone, Bury St Edmunds, Bury Saint Edmunds IP30 9SS	May 2021
Sandridge	35 St. Albans Rd, Sandridge, St Albans AL4 9LE	August 2021
Four Marks	12 Fairfield Green, Four Marks, East Hampshire GU34 5BL	October 2021
Walkern	1 Winters Ln, Walkern, Stevenage SG2 7NZ	August 2023
Crowthorne	2 Lower Broadmoor Rd, Crowthorne RG45 7HD	August 2023
Bursledon	12 Goslings Turning, Bursledon, HANTS, SO31 8LP	February 2024

* The St Albans outlet closed in January 2021, upon the retirement of the franchisee, after having operated successfully for 9 years. The cat hotel building was re-sited at the new Sandridge outlet.

Notes:

- i. Until March 2019, Longcroft also had an outlet at Royston, but this ceased operating due to the franchisee deciding to leave the network for personal reasons.
- ii. It should also be noted that planning permissions were granted for cat hotels at Haywards Heath, because the activity was seen to be acceptable in planning terms. However, for business reasons, Longcroft decided not to establish permanent cat hotels in these locations at the present time.