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**USE OF LAND FOR THE STATIONING OF HOLIDAY LODGES
ST JOHNS HOUSE, LION ROAD, PALGRAVE**

PLANNING STATEMENT

Ref 2883/HL
March 2024

INTRODUCTION AND BACKGROUND

1. This statement has been produced in support of a planning application proposing the use of land for the stationing of holiday lodges at St Johns House, Lion Road, Palgrave.
2. The application comprises this statement together with the following documents:
 - Application Forms and Certificates;
 - Site Location plan scale 1:1250; and,
 - Site layout plan; and,
3. The proposal is to provide a high quality holiday destination in a peaceful and tranquil location. The destination is intended to be a rural retreat. The former walled garden within which the site is located, provides an attractive setting for the holiday lodges. This setting is further enhanced by views across the former park land to the south.
4. The site is also very well located to take advantage of the railway station at Diss which is on the London to Norwich line. In order to encourage guests to use public transport, it is intended that holiday bookings will include transfers to and from the site to Diss station.

PHYSICAL CONTEXT

5. The application site is located on land at St Johns House, Lion Road, Palgrave. The site is not readily visible from the highway, being enclosed by a listed crinkle crinkle wall. St Johns House was last used as a residential institution (Class C2/C2A). The property is currently vacant.

USE

6. The proposed lodges will be used to provide self-catering holiday accommodation.

7. The holiday units will conform to the definition of 'caravans' set out in paragraph 29(1) of the Caravan Sites and Control of Development Act 1960.
8. It is intended to provide holiday accommodation at the site for 11 months of the year. This will ensure the scheme is viable and will enable the applicant to meet demand for holiday accommodation outside of the summer season.
9. The site has excellent links to the A143 and provides an excellent base from which to explore North Suffolk and South Norfolk.

AMOUNT & LAYOUT

10. The holiday lodges will each have a 'footprint' of approximately 65 square metres.

SCALE

11. The scale of the units is illustrated on the submitted drawings. The holiday units will have the following dimensions (approximate); height 2.8m; width 5m; and length 13m.

APPEARANCE

12. As previously stated the holiday units will conform to the definition of 'caravans' set out in paragraph 29(1) of the Caravan Sites and Control of Development Act 1960. An illustration of the type of unit proposed is included with the application.

ACCESS

13. Access to the site will be via the existing vehicular access to Lion Road which has adequately served the existing facility. Being close to the A143, the site has excellent connections to the primary road network.

CONNECTIVITY

14. The site is located approximately 3.5km from Diss railway station and so is accessible by public transport and a short taxi journey.

BIODIVERSITY

15. This application site was historically used as a walled garden for St Johns House. It is currently maintained grassland with a leylandii hedge, it does not provide habitat for protected species. The application provides the opportunity for additional landscaping to be planted to provide Biodiversity Net Gain (BNG).

FLOOD RISK ASSESSMENT

16. The application site is situated within Flood Zone 1 where all types of development are permitted and therefore a Flood Risk Assessment is unnecessary.

DRAINAGE

17. Foul drainage for the units will be provided by a private treatment plant. Surface water will discharge to soakaways.

HERITAGE

18. The brick wall that surrounds the site is grade II listed. The listing entry states:

“Crinkle-crankle garden walls to Park House, Palgrave (q.v.). Early C19 for Harrison family. Flemish bond red brick on flint rubble base. 3 lengths of wall remain to north, east and west sides of rectangular garden 70m by 50m. About 4m high. Offsets over high flint base and towards top, rounded brick coping. On east side is an opening with stone capped piers.”.

19. The walls are listed GV11 which means that they are listed for group value.

20. St Johns House (listed as Park House) is also listed grade II for group value. The listing description states:

21. *"Large house, now a school. C17 origins. Extended and altered in early C19 for Harrison family. Yellow brick front block. Some timber frame to earlier rear sections, largely cased in whitewashed brick and roughcast. Shallow hipped slate roof to front, steeper glazed pantiled roofs to rear. Early C19 block has parallel early range to rear with a further early wing behind at right angles to form a T on plan. 2 storeys with attics in rear wings. 5 bay facade, 2:1:2 breaking forward slightly to centre. Offset plinth. Central entrance: a glazed door with a traceried rectangular fanlight, raised fielded fluted metopes and rosettes on mutules, above porch a balcony with panelled deep reveal. Semi-circular tetrastyle Roman Doric portico, acanthus necking to columns, circle patterned wrought iron railings. On first floor opening onto balcony is large tripartite French window, glazing bars, fluted colonettes as mullions, cornice above which is a large traceried segmental light, all in a gauged brick segmental arched reveal. Outer bays, originally sashed have C20 aluminium framed windows, gauged brick flat arched heads, stone sills. Continuous mutuled eaves cornice with a coped blocking course over centre. Cross axial stacks to rear centre and ends. Parallel range to rear of similar dimensions, mixed sashes and casements on 2 bay returns. Mutuled eaves cornice as to front. Large white brick stacks at ends of gambrel roof. Further back extends long 5-bay range. Right return has lean- to outshut with entrances, C19 and C20 casements, ground floor cambered heads, dormers, ridge stack where 2 forward bays meet 3 brick faced rear bays, roof hipped towards front. Rear gable end kneelers to brick parapet with tumbled- in brickwork. Interior: extensively altered, butt purlin roof with cambered collars in rear wing. To rear of middle block is a lean-to outbuilding behind a C19 red brick link wall, about 15m long and 2m high, segmental headed openings, 1 blocked, dentilled course to rounded brick coping. Park House was formerly known as St. John's after a church taken down in the C16."*

22. There are two other listed buildings nearby, the former grooms house and coach house located 30m east of St Johns House and the former stable block also listed grade II and located approximately 15m north of Park House. The listing entries for these two buildings are as follows.

"Former groom's house and coach house to Park House (q.v.). Early C19 for Harrison family. White brick front with red brick to rear. Hipped slate roofs. A 16 bay 2 storey block with flanking 1 storey bays. Central boarded door with flanking small 4:4 pane sashes, all recessed with segmental heads. Plat band to first floor with a 4-light window. Projecting brick courses to eaves. Tall bay hipped to front. Flanking double doors with gauged brick segmental heads, separate hipped roofs. Interior not inspected. Included for group value".

"Former stable block to Park House (q.v.) Early C19 for Harrison family. White brick front with red brick to rear. Hipped slate roofs. 7 bays. 2 storeys. Ground floor: 4 stable doors with fanlights alternate with 12:12 pane sash windows all with gauged brick segmental heads. Plat band to first floor with a central loft door and 2 outer 6 light windows. Projecting brick courses to eaves. To each end is a low coach house bay, large double doors with gauged brick setmental heads, separate hipped roofs. Interior not inspected. Included for group value".

23. Annexe 2 of the National Planning Policy Framework (NPPF) describes the significance of a listed building as *"The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance"*.
24. Annexe 2 of the NPPF defines the setting of a heritage asset as: *The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.*
25. Paragraph 207 of the NPPF states in part *"Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss"*.

26. Paragraph 208 of the NPPF states *“Where a development would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal”*.
27. In this case, the proposed lodges will have no material impact on how St Johns House, the listed stable and/or the grooms house will be experienced. Therefore, they will have no material impact on the setting or significance of those buildings.
28. The lodges will affect how the crinkle crankle wall is experience and will impact upon its setting. However, that impact will not lead to substantial harm or total loss of significance. Any harm will be less than substantial. In this case, it is considered that the less than substantial harm resulting from the development would be outweighed by the public benefits of providing high quality holiday accommodation in a tranquil parkland setting which will provide economic benefits to the local rural economy.

LAND CONTAMINATION

29. There is no recorded history or evidence of any contamination at the site or on adjacent land.

LANDSCAPE IMPACT

30. The application site is not situated within an area of high landscape quality or special landscape designation. In assessing the potential landscape impact of the proposal, the extent to which the site is visible from public vantage points has been considered and evaluated.
31. It is considered that the development will not be a prominent or detrimental feature on the landscape.

LIGHTING

32. The proposals will only include exterior lighting on a domestic scale. This is unlikely to affect the area given the extent of trees and hedgerows which screen the site.

PARKING PROVISION

33. Each holiday lodge will be provided with two parking spaces.

RESTORATION

34. In the event that at some time in the future, the development comes to the end of its life, the site could easily be restored back to open land. There will be no physical alterations other than the access driveway and private treatment plant all of which could easily be removed if necessary. Site restoration could be controlled by way of a planning condition.

PLANNING POLICY CONTEXT

35. The proposed development finds support from national and local planning policies. The National Planning Policy Framework (NPPF) sets out the Government's planning policies for all forms of development. The main principle of the NPPF is that it provides a presumption in favour of sustainable development. The document states that there are three objectives to sustainable development, being economic, social and environmental and that planning decisions should be approved for development which fulfils these three objectives.
36. In this case, the development will provide economic and social benefits. The tourist facility will provide additional income for village facilities in Palgrave, Wortham, Diss and surrounding villages. As such, the development will also provide local social benefits in terms of helping to sustain the viability of local services thereby helping to safeguard local jobs.
37. The NPPF at paragraph 88 states that local authorities should "*support sustainable tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside*". This proposal will benefit rural businesses by providing more trade and custom.

38. Paragraph 89 of the NPPF confirms 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. It goes on to state *“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 explores any opportunities to make a location more sustainable”*.

Babergh and Mid Suffolk Joint Local Plan

39. Policy SP07 is the strategic policy for tourism. It states:

“1) New sustainable tourism development that supports the tourism role of the settlements across Babergh and Mid Suffolk will be encouraged, where appropriate to the scale, character and nature of their locality.

2) Historic, recreational and landscape-based tourism proposals that demonstrate protection of the historic and natural environment will be supported.”

40. Policy LP12 deals with tourism leisure. It is reproduced below.

Policy LP12 - Tourism and Leisure

- 1. Proposals for new tourism and leisure facilities, or improvements/extensions to existing facilities, will be supported where they:**
 - a) Improve the Districts’ ability to attract and cater for visitors, increase local employment opportunities, enhance the vitality of places and provide for environmental improvements;
 - b) Improve the range, quality and accessibility of facilities;
 - c) Are accessible by public transport and facilitates walking and cycling, whilst providing appropriate parking and access, and ensuring the associated traffic movement would not compromise highway safety;
 - d) Include facilities which are open to the wider community, to enhance both accessibility and the range of facilities available;
 - e) Respect the character of the landscape by having regard to landscape guidance that supports the development plan; and
 - f) Follow a hierarchy of seeking firstly to avoid impacts, secondly mitigating for impacts so as to make them insignificant on the local ecology, biodiversity, trees and hedgerows, or thirdly as a last resort compensate for losses that cannot be avoided or mitigated.
- 2. In addition to the criteria above, proposals outside settlement boundaries may be supported where the proposal:**
 - a) Increases access, enjoyment and interpretation of the countryside, appropriately, sensitively and sustainably;
 - b) Improves accessibility for existing places, which are not well served by public transport; and
 - c) Is of an appropriate scale for their context.

41. Policy LP13 deals specifically with countryside tourism accommodation. It is also reproduced below.

Policy LP13 - Countryside Tourist Accommodation

1. **Outside settlement boundaries, applications for tourist accommodation will be considered on an exceptional basis. In addition, applications must:**
 - a) **Demonstrate an overriding business need to be in that location;**
 - b) **Be sympathetic to the character of the area; and**
 - c) **Be accessible by a range of transport modes.**
2. **New tourism accommodation will be controlled by planning conditions which take account of the individual business models and/or locational ecological impacts.**
3. **In addition to criterion at 1 (a – c) proposals to extend or upgrade tourism accommodation must provide a balanced mix of economic, social and environmental benefits.**
4. **The Councils will only support the removal of a holiday occupancy condition if evidence is provided that there is no demand for the ongoing use of the tourist accommodation, as evidenced by sustained marketing for 6 months.**

42. In this case, the development is in accordance with the aims and objectives of the local plan policies. The proposed development has a "*overriding business need to be in that location*" because the tranquil parkland setting of the location is the main attraction of the scheme. It would not be possible to experience the setting if the use was located elsewhere.

CONCLUSIONS

43. The proposed development will provide economic, social and environmental benefits. Visitors staying at the site will help to sustain local pubs, shops and will provide more income for other tourist attractions in the area.