New Barn Farm House, Pains Hill Lockerley, Romsey, HANTS, SO51 0JE



Application Supporting Statement

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

1. INTRODUCTION & 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. The new structure will be sited within an existing stable building in line with policy LE16.
- 1.2. This application relates to the conversion of an existing building using outer shell with minor alterations to be made to form an **additional 4 rooms** to form as additional boarding to the already existing business. Planning permission for the original and already existing cat hotel was granted, on the 10th January 2020 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".
 - 1.3. Attached as **Appendix 1** to this Statement is a schedule of the existing Longcroft cat hotels currently operating in the UK.
 - 1.4. 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.
 - 1.5. Finally, the conclusions present a brief review of the content of this Statement in support of the case.

2. ABOUT THE APPLICANT & THE EVOLUTION OF THE CONCEPT

- 2.1. The original Longcroft Luxury Cat Hotel company has provided a low-key, high quality, niche service for cat owners requiring short-term accommodation for their cat since 2010. Longcroft hotels are usually known for being sited within residential environments (although some are in rural locations). Longcroft serves those not wishing to use conventional catteries which generally cater for large numbers of cats in small environments. The accommodation in a Longcroft hotel is designed to small numbers of cats but offering more spacious accommodation. 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 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 make use of timber partitioning which easily 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 part time 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 their partners all 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 most recently the Guardian's 2016 Small Business Showcase Award for 'Home Business'). In determining the application (reference W6/2009/88/EM), the planning 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 in St Albans (reference 5/2011/2931), planning permission was granted because the officer found the proposed development "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, at this location and 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. 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.
- 2.14. 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.
- 2.15. **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 -** The Office for National Statistics' (ONS) estimate for Test Valley Borough Council's population as at the 2021 Census was 131,190 and some 52,599 dwellings.
- 3.7. Using the PFMA's survey figures, in the context of the above Census totals, would suggest that there could be some 13,675 households within the Borough that own a cat.
- 3.8. It can be seen that there is enough demand for additional facilities to accommodate cats in the locality and even though there may already be catteries in an area, these facilities are not always comparable in terms of quality, or convenience.

4. THE APPLICATION PROPERTY

- 4.1. The application property is two-storey detached house, fronting the road known as Cooks Lane. The house sits upon a very large plot amounting to nearly 1 hectare. To the immediate rear of the house is a group of outbuildings, broadly arranged in a 'horseshoe' shape around a courtyard.
- 4.2. There is considerable opportunity for parking vehicles behind the dwelling within the courtyard.
- 4.3. The area is not a conservation area, and neither is the area within a zone which is subject to high river flood risk (parts of the subject road are noted as being at a slightly higher risk from surface water flooding, but the risk is mostly assessed as 'low' and neither the subject house nor its outbuildings is affected by the designation).

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 CIEH model guidelines and under Environmental Health licensing conditions the 4 suite extension will be capable of housing up to 6 cats within the proposed 4 room hotel. However, the Longcroft concept is strictly centred around Animal Welfare offering more space to fewer cats. The overall level of the investment into the local economy is around £30,000. Longcroft always favours local gardeners, builders and electricians to complete each build.
- 5.2. There are about 25 Longcroft hotels already operating (a further one opens soon; see **Appendix 1**), with most being located within residential areas, or close to other housing.
- 5.3. **Description of the building** The cat hotel building is manufactured to Longcroft's strict specification which is one of the highest quality available, it is of a type that naturally offers excellent insulation properties from noise entering the sleeping areas 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 white with galvanised safety mesh in the centre. Each building's dimensions are similar to the type of domestic outbuilding which would be permitted development under Class E of the Town & Country Planning (General Permitted Development) (England) Order, GPDO. The proposed height of the unit is 2480mm at the front and 2180mm to the rear, which allows space for the cats to climb and exercise.
- 5.4. The base of the building measures 4340 mm in depth with a length of 6030mm (or about 27.3m² in area). The proposed building sits on a

simple concrete base and is to be sited within an existing building.

- 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 our local 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 9am 5.30pm. 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. The proposed small extension will not increase the footfall significantly.
- 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 never carried out,** 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 extension and state of the art cat litter used, the waste produced by another 4 suites will be negligible and the current waste contract will be sufficient to fulfil the additional waste. 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 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. In respect of transport matters, the NPPF says 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).
- 6.7. 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".
- 6.8. 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").
- 6.9. 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

- 6.10. The current adopted 'Development Plan' for this area is the Test Valley Borough Revised Local Plan DPD 2011 2029 ('TVBRLP') The Proposals Map shows the land as "Countryside" and as such subject to **Policy COM2** (see below).
- 6.11. **Policy SD1** ("Presumption in Favour of Sustainable Development") says that development that accords with the policies in the Plan "will be approved through the correct planning process without delay, unless material considerations indicate otherwise".
- 6.12. The "Spatial Strategy" on page 34 states "the Council will help

provide additional employment land to support the local and sub regional economy....The countryside of the Borough is multi-functional and supports a variety of employment. Allowing rural employment sites to expand, the re-use of existing buildings and the promotion of tourism will help support the rural economy". Policy COM2 ("Settlement Hierarchy") states that "outside the boundaries of settlements in the hierarchy [development].....will only be permitted if: a) it is appropriate in the countryside as set out in Revised Local Plan policy COM8-COM14, LE10, LE16- LE18; or b) it is essential for the proposal to be located in the countryside".

- 6.13. Objective 4 of the Local Plan "Local Economy" is to provide "a range of job opportunities" in the Borough. Likewise paragraphs 6.4 & 6.5 of the reasoned justification note the need to diversify and "promote a successful local economy in both the towns and rural areas of the Borough", and provide local job opportunities so as to reduce out-commuting rates.
- 6.14. Paragraph 6.84 explains that "to support growth and expansion of the rural economy existing buildings suitable for conversion should be put to small scale commercial uses to help sustain the rural economy without creating the need for new buildings in the countryside".
- 6.15. Paragraph 6.86 continues "the aim is to keep the amount of new building required in the countryside to a minimum and to protect the character of the existing building, by maintaining its original structure, built form, architectural detail, materials and general design. However, where proposals for alternative use require the creation of new ancillary buildings and/ or extensions to that being converted these will be considered on their own merits. The Council wishes to ensure that uses ancillary to the new use of the building, such as additional car parking or open storage, do not have an impact on the surrounding countryside".
- 6.16. Similarly, paragraph 6.88 says "care will need to be taken to ensure

that uses ancillary to the new use of the building, such as car parking and open storage do not have an intrusive impact on the rural environment including the extensions of the curtilage of the development into the countryside. Account will also be taken of amenity issues such as noise, smell or over-illumination". Accordingly, **Policy LE16** ("Re-Use of Buildings in the Countryside") permits "the re-use of buildings in the countryside for commercial use" provided that (amongst other things) the "development would lead to an enhancement of its immediate setting".

- 6.17. **Policy LHW4** ("Amenity") requires that new development does not affect adversely "the privacy and amenity of its occupants and those of neighbouring properties". In the Officers Report dated 17.01.2020 Ref 19/02823/FULLS the planning officer concluded 'In the absence of any neighbouring property in close proximity to the application site, it is not considered that the proposal will serve to impact the residential amenity of adjoining properties. With regard to potential impact on the host dwelling, given the location of the existing building, outside of the existing garden area, and the modest amount of commercial property proposed, it is not considered that there will be any significant material harm to the amenity of the existing dwelling. Therefore, the application is in accordance with policy LW4H of the TVBRLP.'
- 6.18. **Policy COM14** ("Community Services and Facilities") looks to protect existing local cultural and community facilities from loss.
- 6.19. **Policy E1** ("High Quality Development in the Borough") permits development "if it is of a high quality in terms of design and local distinctiveness". New development "should integrate, respect and complement the character of the area in which the development is located in terms of layout, appearance, scale, materials and building styles....[and make]....efficient use of the land whilst respecting the character of the surrounding area and neighbouring uses".
- 6.20. Policy E2 ("Protect, Conserve and Enhance the Landscape

Character of the Borough") requires that new development is positively integrated into the landscape and "does not result in the loss of important local features such as trees, walls, hedges or water courses".

- 6.21. **Policy E5** ("Biodiversity") seeks to protect, restore and enhance biodiversity and development which leads to "the loss, deterioration or harm to habitats or species of importance to biodiversity" will not normally be permitted.
- 6.22. **Policy T1** ("Managing Movement") generally seeks to support development that enables use of sustainable transport.
- 6.23. **Policy T2** ("Parking Standards") requires parking provision to be "in accordance with the standards set out in Annex G....[and]....it will be necessary for applications to be accompanied by evidence justifying variations from the standards". Annex G includes the standard for "Catteries and Kennels" of "1 space per 5 animal kennels. Each application will be considered based on a Transport Assessment".

Need

- 6.24. 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 to the cattery for two years. As a result, many catteries went out of business and have been unable to reopen despite the end of the Pandemic.
- 6.25. 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.
- 6.26. 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). There is no provision of short stay cat accommodation in the immediate vicinity and the nearest comparable facilities are some miles away.

Sustainable Economic Investment

6.27. 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". 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).

- 6.28. Likewise, in terms of the WCS, **CS15** ("Sustainable Economic Development"), gives support to many forms of employment development including measures to assist home working. The WCS also seeks to provide services that the community needs, in accessible locations (the nature of the proposed activity is not one which could be operated from a town centre) and will work with a variety of stakeholders to achieve this (see WCS **Policy CS19**).
- 6.29. The subject proposal involves investment into the application premises (amounting to more than £30,000) 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.
- 6.30. 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 restraint (see **Appendix 1**).
- 6.31. Rural business is also encouraged in the NPPF and "decisions

should recognise that sites to meet local business 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" (see NPPF, paragraphs 89).

- 6.32. Many other planning authorities have found the subject activity to be acceptable, both within urban and rural locations. This includes authorities such as the South Downs National Park Authority, which said "the proposal is considered to be sustainable development, where development should be supported....[and] is considered to accord with the purposes of the South Downs National Park".
- 6.33. The new structure is to be located within an existing building upon the existing site, so is making effective reuse of land (see NPPF paragraphs such as 117 & 118).

7. OTHER DEVELOPMENT CONTROL MATTERS

- 7.1. **Transportation & Parking** On 5th December 2019, and in response to the Highways Development Planning commented that they were 'satisfied that the proposed development is a very low traffic generator and would as such be suitable in this location in highways terms. In line with the above, Highways Development Planning raises no objections to this proposal.'
- 7.2. The planning officer concluded that in terms of access, ref 19/02823/FULLS, 'The proposed development does not include any significant alterations to the existing vehicular access or result in a materially significant increase in vehicular movements. Consequently, it is considered that the application significantly provides for the highway safety of the local road network in accordance with policy T1 of the TVBRLP.'
- 7.3. The planning officer concluded that in terms of parking, ref 19/02823/FULLS, 'The existing internal Highways track and driveway area is sufficient to accommodate the parking of vehicles without reducing the parking capacity serving the existing dwelling. Consequently, it is considered that the proposal will avoid the need for parking offsite and as a result the application is in accordance with policy T2 of the TVBRLP.'
- 7.4. The NPPF and Development Plan policy (such as WCS **Policies CS21** & **CS22**) 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.

- 7.5. **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.
- 7.6. **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'.
- 7.7. Notwithstanding the lack of a flood risk issue in this particular location, even in areas where there is background evidence of flood risk (such as the Green Lane application in the London Borough of Croydon see above), the small scale of the proposed development has still been considered to be acceptable. Thus, the proposal would also be compliant with the relevant Government policy in the NPPF (such as paragraphs 165 & 173, and WCS Policy CS9).
- 7.8. Biodiversity TVBRLP Polic**y E5** seeks to protect, restore and enhance biodiversity and the Applicant has carried out an ecological survey of the existing structure to ensure that no protected species will be harmed by the demolition. The report by 4 Woods Ecology LTD found no such species present.
- 7.9. **Surface Water** there is some evidence of propensity for enhanced risk of flood from surface water in the vicinity and Government policy generally seeks to protect the built environment from increased flood risk. As noted above, however, this problem does not affect the subject property itself. Furthermore, in the case cited earlier (within the

London Borough of Croydon), where the site itself was at increased risk of groundwater flooding, the officer found that due to its small scale, the development would not "negatively impact on flood issues within the area".

8. SUMMARY AND CONCLUSIONS

- 8.1. In the light of the above we **summarise** the position as follows:
 - This application relates to the conversion of an existing building using the existing outer shell with minor alterations to be made to form an additional 4 rooms to the already operating cat hotel business.
 - 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 continues to roll out its franchise across the country.
 - There are an estimated 11 million cats in this country, yet only some 2,000 licensed catteries. Of these existing facilities, many tend to be old, poorly maintained, and built from unsuitable materials (such as timber), which are difficult to maintain and keep clean. Levels of cat ownership are likely to be high locally and yet comparable facilities within easy distance of the subject site are few.
 - The mismatch between demand and supply (there are deficiencies in both quality and quantity) has 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 in Conservation Areas, the Green Belt, National Parks & AONBs). Since these operations have commenced, there is no history of any residential amenity problems, relating to such matters as noise, waste control, or odours.

- 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 every other day stopping for ten minutes at a time. No 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 recognises that sustainable transport opportunities (such as public transport) are often more limited in rural areas. Decision-making should be approached positively and enterprise (particularly that which enables working from home, thereby reducing the need to travel); which introduces new investment; and which improves community services should be supported (see the NPPF and the 'Development Plan').

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

- The application will provide additional accommodation to an already much-needed local service and assist in meeting a qualitative and quantitative shortfall.
- The new structure will be similar in form and scale and have the attributes and characteristics of a normal domestic outbuilding.
 Furthermore, the activity is one that has been proved to cause no issue with residential amenity and has been found acceptable in both urban and rural locations.
- 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', in particular Policy LE16 and 'TVBRLP' Objective 4 and Policies such as SD1, COM2, E1, E2, E5, LHW4, T1, & T2. 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	73 Great Ganett, Welwyn, HERTS, AL7 3DB	March 2016

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