

DEVELOPMENT ENQUIRY SERVICE
PRE-APPLICATION SUMMARY REPORT



Application number 22/00098/MOR

Applicant's address Hoe Lodge Restaurant, Hoe Road, Plymouth PL1 2PA

Proposal

Pre-application for internal alterations and single storey extension

Date of Response: 17.05.22

Summary of key elements to the proposal

This pre-application is for internal alterations and a single storey extension to the Grade II listed Lodge Café, located on Hoe Road. The single storey, glazed extension would provide an enlarged indoor eating area, sited to the rear of the building within the courtyard area.

The site sits within the Grade II Hoe Registered Park and Garden, the Royal Citadel Scheduled Ancient Monument and the Hoe Conservation Area. The building contains a garden area with outdoor seating to the front (south) and a courtyard/ service area to the rear (north). The site is bound by public toilets to the north-east and the Garden of Hope to the west.

A Heritage Statement has been submitted in relation to the application. No in principle objections are raised to the proposed development. Further information is sought in regards to biodiversity net gain and a Visual Impact Assessment to determine the impact on the Grade II Hoe Registered Park and Garden. Further consultation will be sought from the Garden's Trust in regard to the potential to part remove a hedgerow to the west of the site in order to open up views from the proposed extension onto the Garden of Hope and wider Hoe setting.

Relevant policies

The proposal has been assessed against the Plymouth and South West Devon Joint Local Plan (2019) and the National Planning Policy Framework 2019. Additionally, the proposal has been assessed against the policies contained in the Plymouth and South West Devon

Supplementary Planning Document (2020) and the Hoe Conservation Area Appraisal and Management Plan (2008).

Consultee comments

Local Highway Authority – No objection

Natural Infrastructure team – No objection subject to further information

Local Lead Flood Authority – No objection subject to further information

Historic Environment – No objection subject to conditions

Urban Design – Supportive of proposal (verbal discussions)

The Hoe Conservation Area – No comments received

The Gardens Trust – No in principle objection subject to submission of a Landscape Visual Impact Assessment to assess impact on the Hoe Registered Park and Garden

The Hoe Neighbourhood Forum – No comments received

The Society for the Protection of Ancient Buildings – No comments received

The Victorian Society – Concerns raised in regards to scale and design of proposed extension

Please note that Historic England and the Council's Public Protection team do not provide comments on pre-applications as they offer their own pre-application service.

Summary of issues and officer views

Principle of Development

Policy PLY20 of the Joint Local Plan seeks to renew, enhance and maintain Plymouth's waterfront, showcasing the area as a unique, sustainable and vibrant asset that drives the City's economic, cultural, social and environmental well-being.

The Policy seeks to protect and enhance the Hoe's unique man-made and natural heritage and using development and public realm measures proactively to repair damaged environments, re-use historic buildings and enhance the overall enjoyment of the area by visitors and residents.

Policy PLY21 states support will be given for proposals which protect and deliver growth for Plymouth's visitor economy in its core tourism area. Proposals which help enhance Plymouth as a destination for all seasons, including the effective use of the waterfront and the City Centre for events, and which support business tourism and tourist related business development, will be supported.

This pre-application is for the construction of a lightweight glazed extension to the rear of the Lodge (Grade II listed), within the courtyard area. Following a site visit, Officers note the rear courtyard is currently underutilised with limited storage space/ temporary structures and is not of any particular merit.

Officers raise no in principle objection to the proposed development, subject to the proposal conforming to national and local policy set out below, with particular regard given to the sensitive historic context of the site.

Design/ Impact on the Historic Environment

Policy DEV21 of the Joint Local Plan states that 'Great weight will be given to the conservation of the Plan Area's designated heritage assets. Where development proposals will lead to any harm to the significance of a designated heritage asset, they

must be fully justified against: the public benefits of the development, and whether there are substantial public benefits in cases where there would be substantial harm'

The heritage assets identified as potentially being affected by the proposal include:

- The Lodge (Grade II Listed Building)
- The Royal Citadel (Scheduled Ancient Monument)
- The Hoe Registered Park and Garden (Grade II)
- The Hoe Conservation Area

As requested by Officers, a Heritage Statement has been submitted in relation to the application. Having reviewed the statement, the Council's Historic Environment team agree with the findings that the proposals would amount to less than substantial harm to the Grade II listed building and this can be weighed against the public benefits. Public benefits include contributing to the economic and social objectives of the NPPF and Policies PLY20 and PLY21 through the improvement of the facilities offered to residents and visitors within the City's waterfront.

Officers consider the glazed structure to be a suitable addition in regards to its design and note the structure would not alter or detract from the architectural and aesthetic significance of the Grade II listed building which include the ornate windows, shaped barge boards and a veranda, located to the front of the building. Proposed materials are unknown at this stage, however, Officers would expect aluminium to be marine grade to withstand the coastal elements.

The Heritage Statement identifies the proposal's impact on the Royal Citadel Scheduled Ancient Monument, Registered Park and Garden and the wider Conservation Area to be either neutral or an enhancement.

Given the archaeologically sensitive nature of the site, a programme of archaeological works would be conditioned as part of any planning approval.

The Garden's Trust were consulted on the application, prior to the submission of the Heritage Statement. Based on the information provided, the Gardens' Trust considered the proposed extension would not have a significant impact on the Grade II Registered Park and Garden. However, it is expected that any formal planning application would be accompanied by a Visual Impact Assessment to demonstrate the impact the proposal would have on the Registered Park and Garden.

The submitted Heritage Statement states whilst mostly enclosed within the yard, there is opportunity for the west elevation to open out onto the Garden of Hope to provide an increased outlook. Further consultation with the Gardens Trust will be sought in regards to this aspect and the pre-application report will be updated accordingly.

The Applicant is encouraged to engage with Historic England via their pre application service which can be accessed here: <https://historicengland.org.uk/services-skills/our-planning-services/charter/our-pre-application-advisory-service/>

Neighbour Amenity

Policy DEV1 of the Joint Local Plan seeks to ensure that new development provides for satisfactory daylight, sunlight, outlook, privacy and the protection from noise disturbance for both new and existing residents, workers and visitors. Unacceptable impacts will be judged against the level of amenity generally in the locality.

Policy DEV2 states proposals which will cause unacceptable on- or off-site risk or harm to human health, the natural environment or living conditions, either individually or cumulatively, will not be permitted.

The Council's Public Protection Service do not provide comments on Development Enquiry Service applications, offering a separate service accessed here:

<https://www.plymouth.gov.uk/publicprotectionadviceandsupport/environmentalconsultancy>

It is not anticipated that the proposal would have an unacceptable impact on the surrounding amenity by way of noise and disturbance. Officer's note the site is located a reasonable distance from nearby residential development as not to warrant concern.

Green Space

The site is located within the Hoe City Green Space, identified in the Plymouth Policy Area Open Space Assessment (2017) as having a range of functions including; biodiversity, recreation, cultural heritage and health and well-being. The proposal does not appear to result in the loss of green space, however details confirming this at planning application stage would be required.

Biodiversity

The site is within the Hoe Approach/Hoe Road stepping stone Biodiversity Network Feature (BNF) and adjacent to the County Wildlife Site (CWS) Plymouth Hoe and Madeira Road.

The Council's Natural Infrastructure team have assessed that there is a very low risk of protected species being on site. Therefore, an Ecological Survey is not required. However, a biodiversity net gain is sought, in line with JLP Policy DEV26. Evidence demonstrating a net gain should be displayed in a Biodiversity Budget table and displayed on site plans, or on an Ecological Constraints and Opportunity's Plan (ECOP).

Enhancement measures might include provision of bat roosting and bird nesting opportunities, native tree, shrub and wildflower planting, insect boxes etc. CD-sized holes proposed to be cut into the bases of the timber fences, or the use of gravel boards with ready-made hedgehog holes to allow the passage of hedgehogs in and out, and within the site should be considered where appropriate.

Bat licence

If a licence is required to destroy a bat roost, the applicant must demonstrate that the three tests listed in the Species and Habitats Regulations 2017 are met:

1. The activity to be licensed must be for imperative reasons of overriding public interest or for public health and safety
2. There must be no satisfactory alternative
3. Favourable conservation status of the species must be maintained

Bird and bat bricks/boxes

Applicants should use inbuilt (where possible) zero maintenance bricks or boxes.

Bat bricks to be installed at eaves level on the southern elevation for bats. West and east elevations are acceptable. Bird bricks to be installed at eaves level. West and east elevations are ideal. South should be avoided as the sun heats can heat up the eggs too much and north is too cold.

Trees

A large tree to the East of the site does not seem to be affected by the proposed development. Please note that in practice no associated works or materials should be located within 2m of the canopy spread; this is necessary to avoid root compaction and damage. Additionally, trees on site are protected under the Hoe Conservation Area.

No tree survey will be required. We will however, in line with Plymouth's Plan for Trees, be seeking canopy enhancements (as part of the biodiversity net gain) as the site is located within St Peter and the Waterfront Ward which has the 4th lowest tree canopy cover in the City (only 5.82% coverage versus the Average Plymouth Policy Area of 18.50%).

Landscaping

The proposed development site is near to the Inner Plymouth Sound Landscape Character Area, however, given the scale of the development and design we consider there to be no significant detrimental impact to the character of the area.

Details of soft and hard landscaping should be provided and the Applicant is encouraged to submit this upfront with any formal planning application.

Highway Considerations

The Highway Authority were consulted on the application and raised no objection. Officers note there are a number of public car parks and opportunity for on street parking within the local area. The proposal complies with Policy DEV29 of the Joint Local Plan.

Flooding

The site is located in Flood Zone 1 and considered to be at a low risk from fluvial and tidal flooding. Surface water flood risk mapping indicates a low risk of flooding from a 1 in 10 year return period event.

The site is located in a Critical Drainage Area where the Environment Agency considers the existing drainage system to be at or close to capacity.

The Local Lead Flood Authority were consulted on the application consider that the proposed extension would not significantly increase flood risk to or from the site. Details of the existing and proposed surface water drainage are required in line with the Plymouth Local Flood Risk Management.

Clarification of validation requirements

Any application would need to be accompanied by the following documentation. Full details of the requirements of each aspect can be found on the Council's Local Validation List online at

<https://www.plymouth.gov.uk/planninganddevelopment/planningapplications/applyplanningpermission0>

- Full Planning Application form
- Correct Fee
- Community Infrastructure Levy Form
- Site Location Plan

- Existing and Proposed Site Plans
- Existing and Proposed Floor Plans
- Existing and Proposed Elevation Plans
- Design and Access Statement
- Details of Parking (if parking is proposed)
- Details of Refuse Disposal
- Heritage Statement including a Heritage Impact Assessment
- Drainage Strategy
- Flood Risk Assessment
- Evidence of a biodiversity net gain (biodiversity budget table and ecological opportunities and constraints plan)
- Landscape Visual Impact Assessment
- Landscaping details
- Sustainability Statement
- Archaeological Assessment

Conclusion including likely support for proposal

No in principle objections are raised to the proposed development. Further information is sought in regards to biodiversity net gain and a Visual Impact Assessment to determine the impact on the Grade II Hoe Registered Park and Garden. Further consultation will be sought from the Garden's Trust in regard to the potential to part remove a hedgerow to the west of the site in order to open up views from the proposed extension onto the Garden of Hope and wider Hoe setting.

PLEASE READ THESE NOTES CAREFULLY

Any advice given by council officers following pre-application enquiries does not constitute a formal response or decision of the council in respect of any future planning applications.

Any views or opinions expressed are given in good faith, and to the best of ability, based on existing planning policies and standards, without prejudice to the formal consideration of any future planning application. The final decision on any application that you may then make can only be taken after the Council has consulted local people, statutory consultees and other interested parties. The final decision on an application will then be made by senior planning officers or by the Council's planning committee and will be based on all of the information available at the time.

It follows that officers cannot give any guarantees about the final formal decision that will be made on any future planning application. However, any pre-application advice that has been provided will be carefully considered in reaching a decision or recommendation on an application, subject to the proviso that circumstances and information may change, and so alter that position. (The weight given to pre-application advice notes will inevitably decline over time and little or no weight may be given to the Council's pre-application advice for schemes which are submitted more than two years after the advice being issued.)

Any advice given in relation to planning history of the site, planning constraints or statutory designations does not constitute a formal response under the provisions of the Local Land Charges Act 1975.

Pre-application requests for advice are made public and documents will normally be released if we receive a freedom of information request or environmental information request and our file notes will form part of the public file if an application follows. We cannot therefore guarantee confidentiality. If the information you provide includes commercially sensitive or

confidential information this should be clearly stated at the head of the submission. We can then take this into account should an FOI/EIR request be received.

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