

PLANNING AND DESIGN STATEMENT ADDENDUM

Validation Information and Supporting Assessments

Site	Pencroft Ltd / Laugherne Villa, Martley Road (B4204), Martley, Worcestershire WR6 6QA
Proposal	Extension to existing workshop and construction of two new Class E(g) buildings, with associated infrastructure, parking and landscaping
Application	S62A/2026/0157
Applicant	Pencroft Ltd
Prepared by	Boughton Butler Ltd
Date / Version	August 2026 Version 1.0

Purpose of this Addendum

This Addendum is submitted in response to the Planning Inspectorate validation request and should be read alongside the Planning and Design Statement dated 3 June 2026. It provides the additional information requested in relation to economic matters, flood risk, foul drainage, lighting, noise, land contamination, arboriculture, air quality, planning obligations and Community Infrastructure Levy (CIL). Other validation items, including drawing amendments and biodiversity documentation, are addressed separately.

1.0 Introduction and Scope

1.1 The Planning Inspectorate has requested supplementary information to validate the application for the proposed extension to the existing Pencroft workshop and two new Class E(g) units at Laugherne Villa / Pencroft Ltd, Martley. The validation request specifically seeks further information on a number of technical and economic matters.

1.2 The purpose of this document is to provide a proportionate, site-specific response to those matters. Where the nature of the proposal does not generate the impact that a specialist assessment is intended to examine, the relevant section explains why a standalone specialist report is not considered necessary.

1.3 The development remains as described in the submitted Planning and Design Statement: a 180 sqm extension to the existing workshop, with no increase in staffing associated with that extension, together with two single-storey Class E(g) units of 288 sqm and 576 sqm respectively (864 sqm total), served by 35 new parking spaces.

1.1 Validation Response Schedule

Validation item	Response provided	Section
Economic Statement	Expanded economic, rural employment and business-resilience case	3.0
Flood Risk Assessment	Proportionate site-specific FRA for a 1.4 ha Flood Zone 1 site	4.0
Foul Sewage Utilities	Non-mains package treatment plant strategy	5.0
Lighting	No external lighting proposed; separate assessment unnecessary	6.0
Noise	No external plant/extraction or atypical noisy process proposed	7.0
Land contamination	Development areas are undeveloped with no known contaminative history	8.0
Arboriculture	Justification for proportionate tree protection rather than full specialist survey	9.0
Air quality	No new emission-generating plant/process; same-site precedent considered	10.0
S106 / CIL	No identified planning obligations; employment development is CIL zero-rated	11.0

2.0 Development Summary

2.1 The application represents the controlled consolidation and diversification of an established rural employment site. It does not introduce a new general industrial use into an otherwise sensitive location; rather, it extends existing workshop accommodation and provides flexible Class E(g) employment floorspace alongside the established employment cluster.

- 180 sqm extension to the existing steel-framed workshop, providing additional internal repair and maintenance space. No increase in staffing is proposed as a consequence of the extension.
- Two new single-storey Class E(g) units: one 288 sqm unit and one 576 sqm unit, providing 864 sqm of new employment floorspace.

- 35 formally laid-out parking spaces to serve the new Class E(g) units, with servicing and turning contained within the site.
- The intended occupier profile is office, research/development and light-industrial activity compatible with Class E(g), rather than general industrial processes.
- Surface water is to be managed through an infiltration-first sustainable drainage approach, subject to ground testing and detailed design.

3.0 Economic Statement

3.1 This section expands upon Section 6.2.2 of the submitted Planning and Design Statement. The proposal provides both direct support to an established rural business and new flexible accommodation capable of supporting additional businesses, employment and investment in the Martley area.

3.1 Existing Business Retention and Resilience

3.1.1 Pencroft Earth Moving is an established rural business providing plant and earth-moving services which support construction, infrastructure and land-management activity. The 180 sqm workshop extension is not proposed to increase staff numbers; its economic purpose is to improve the efficiency and resilience of the existing operation by increasing the amount of repair and maintenance activity that can be undertaken internally and under cover.

3.1.2 Improved internal maintenance capacity reduces operational disruption, supports better utilisation of vehicles and plant, and allows the established business to continue investing at its existing rural employment base. These are genuine economic benefits even where the extension itself does not produce an immediate increase in headcount.

3.2 New Rural Employment Floorspace

3.2.1 The two new Class E(g) units provide 864 sqm of additional modern employment accommodation. The units are deliberately flexible in scale and format, making them capable of accommodating small and medium-sized enterprises, start-up businesses, expanding local firms, office-based businesses and light-industrial occupiers whose activities are compatible with the amenity safeguards inherent in Class E(g).

3.2.2 Rural business accommodation of this type provides a practical opportunity for businesses to establish, remain and expand locally rather than being dependent on larger urban employment estates. The proposal therefore broadens the local employment offer and increases the stock of fit-for-purpose commercial floorspace available within the rural area.

3.3 Employment Creation and Retention

3.3.1 The development creates capacity for employment growth within the two new Class E(g) units and supports retention of existing employment at Pencroft. Precise future job numbers cannot responsibly be fixed at planning application stage because the units are intended as flexible accommodation and the identity and operating model of future occupiers are not yet known.

3.3.2 Notwithstanding this, the provision of 864 sqm of new employment floorspace clearly creates additional economic capacity and a platform for job creation. It also supports employment choice in a rural area and can provide opportunities for local residents to work within or closer to their community.

3.4 Construction and Supply-Chain Benefits

3.4.1 The construction phase will generate temporary expenditure through building works, materials, plant, professional services and associated supply chains. The scale and nature of the scheme provide opportunities for local and regional contractors and suppliers, generating expenditure within the South Worcestershire economy.

3.4.2 Once occupied, the new units will also generate ongoing demand for servicing, maintenance, professional services, utilities and other business-to-business expenditure. These indirect effects add to the economic value of the floorspace itself.

3.5 Efficient Use of an Established Employment Location

3.5.1 The proposal directs investment to land immediately associated with an established rural employment cluster, using existing access and site infrastructure and consolidating the existing pattern of development. This is materially different from establishing a new, isolated commercial destination in open countryside.

3.5.2 The economic benefits should therefore be afforded positive weight: the scheme supports an established business, provides new rural employment capacity, broadens the local commercial offer, supports construction and supply-chain expenditure, and strengthens the resilience of an existing employment location.

4.0 Flood Risk Assessment

Assessment basis. The application site is stated to extend to approximately 1.4 hectares and lies in Flood Zone 1. National guidance requires a site-specific Flood Risk Assessment for development in Flood Zone 1 where the site area is 1 hectare or more. This section is therefore provided as a proportionate FRA for validation purposes.

4.1 Flood Zone and Vulnerability

4.1.1 Flood Zone 1 is the zone of lowest probability for flooding from rivers and the sea, comprising land with less than a 0.1% annual probability of river or sea flooding. The proposed office and light-industrial uses fall within the “less vulnerable” flood-risk vulnerability category.

4.1.2 Less vulnerable development is appropriate in Flood Zone 1. The Exception Test is not required. The key issue for this application is therefore ensuring that the development does not increase flood risk elsewhere and that surface water is managed safely over the lifetime of the development, including allowance for climate change.

4.2 Sources of Flood Risk

Source	Assessment	Response / mitigation
Rivers / sea	Site is in Flood Zone 1, the lowest fluvial/tidal probability zone.	Development type is less vulnerable. No reliance is placed on floodplain storage and no Exception Test is required.
Surface water	Development will introduce roofs and hard surfaces that require controlled drainage.	Infiltration-first SuDS, permeable surfacing where feasible, soakaways/infiltration trenches and attenuation as necessary. Exceedance flows will be routed away from buildings.
Groundwater	No site-specific groundwater flooding issue has been identified in the submitted application information.	Infiltration testing and detailed drainage design will confirm ground suitability. The drainage solution will be adapted if infiltration is constrained.
Sewer / drainage exceedance	There is no reliance on a public foul sewer for the proposed foul strategy.	Foul and surface-water systems will remain separate. Surface-water discharge will be managed within the site and not directed to the foul treatment system.

4.3 Surface-Water Management

4.3.1 The submitted Planning and Design Statement establishes an infiltration-first drainage strategy. Roof water and runoff from hard surfaces will be directed to sustainable drainage measures such as permeable surfacing where feasible, soakaways or infiltration trenches, with attenuation incorporated where required by detailed design.

4.3.2 The objective is to manage runoff close to source, avoid uncontrolled discharge from the site and ensure that the rate and volume of runoff are not increased in a way that transfers flood risk to neighbouring land or the highway. Final sizing will be informed by infiltration/percolation testing and detailed drainage calculations.

4.3.3 A recent permission at the same Pencroft/Laugherne Villa employment location (M/24/00216/FUL) used the same general approach, with the Local Planning Authority requiring a BRE Digest 365 percolation test and an alternative surface-water solution if infiltration proved unsuitable. The current proposal can be designed on the same precautionary basis.

4.4 Climate Change, Levels and Residual Risk

4.4.1 Detailed drainage design will include an appropriate climate-change allowance and will provide safe exceedance routing for events above the design capacity of the drainage system. Finished floor levels will be set with suitable freeboard above surrounding external levels and site grading will direct exceedance flows away from buildings, entrances and sensitive areas.

4.4.2 The residual risk is therefore principally associated with extreme rainfall rather than river or sea flooding. This can be managed through the proposed SuDS hierarchy, appropriate finished levels, permeable surfaces where practicable, controlled exceedance routes and maintenance of drainage features.

4.5 FRA Conclusion

4.5.1 The site is in Flood Zone 1 and the proposed uses are less vulnerable. Subject to implementation of the infiltration-first surface-water strategy and detailed drainage design, the development can be made safe for its lifetime without increasing flood risk elsewhere. The proposal is therefore acceptable in flood-risk terms and the information above provides a proportionate Flood Risk Assessment for validation.

5.0 Foul Sewage Utilities Assessment

5.1 There is no mains foul drainage available to serve the development. A connection to the public foul sewer is therefore not a practicable option and the foul drainage strategy will use off-grid treatment in the form of one or more package sewage treatment plants.

5.1 Nature of Foul Flows

5.1.1 The new Class E(g) units will generate ordinary domestic-type foul sewage from WCs, wash-hand basins and staff welfare/kitchen facilities. No trade effluent or industrial process effluent is proposed to be discharged to the foul system.

5.1.2 The workshop extension is intended to provide additional internal repair and maintenance space and does not involve a staffing increase. Oils, fuels, chemicals or maintenance liquids will not be discharged to the foul drainage system and will continue to be managed separately in accordance with normal environmental and waste-management requirements.

5.2 Proposed Non-Mains Solution

5.2.1 One or more proprietary package treatment plants will be selected and sized to the design population and calculated foul flows of the development in accordance with the manufacturer's specification, Building Regulations requirements and relevant environmental standards. The final arrangement may comprise a shared plant or separate plants serving individual units, depending on detailed design and site levels.

5.2.2 Treated effluent will be discharged by an appropriate route, with discharge to ground through a correctly designed drainage field/infiltration system being considered where ground conditions permit. Any alternative discharge arrangement will be designed to comply with Environment Agency requirements and any permit or consent that may be necessary.

5.2.3 The installation and operation of the treatment system will comply with the Environment Agency's General Binding Rules where applicable. Adequate access will be maintained for inspection, servicing and desludging, and the system will be subject to routine maintenance in accordance with the manufacturer's requirements.

5.3 Separation from Surface Water

5.3.1 Foul drainage will be entirely separate from the proposed surface-water SuDS system. Roof and yard runoff will not be routed through the package treatment plant, and treated foul effluent will not be allowed to compromise the operation of the surface-water drainage system.

5.3.2 On this basis, the absence of mains drainage does not prevent the development from being adequately served. Package treatment plant technology is a well-established and appropriate solution for rural employment sites where a public foul sewer is unavailable.

6.0 Lighting Assessment / Justification

6.1 No external lighting forms part of the planning application. There are no proposed lighting columns, floodlights, yard lights, illuminated advertisements or external security lighting associated with the scheme.

6.2 In the absence of external lighting there is no new source of sky glow, glare, light trespass or illumination of landscape/ecological receptors requiring quantitative lighting assessment. Ordinary internal lighting within the buildings is not expected to give rise to effects materially different from the existing and permitted employment uses on the site.

6.3 A separate specialist Lighting Assessment would therefore serve no practical purpose and is not considered proportionate. If external lighting is proposed in the future, details could be considered separately and, if necessary, controlled by condition requiring the location, mounting height, beam orientation, luminance and hours of use to be approved before installation.

7.0 Noise Assessment Statement

7.1 No external noise-generating plant or equipment is proposed as part of the application. In particular, the scheme does not include external extraction systems, large ventilation plant, condensers, compressors, generators, furnaces or other fixed external equipment of a type that would require acoustic assessment.

7.2 The new units are proposed for Class E(g) office, research/development and light-industrial uses. Class E(g) industrial activity is, by its nature, limited to activity capable of being carried out in a residential area without detriment to amenity from matters including noise and vibration. The application is not seeking unrestricted general industrial (B2) use.

7.3 The workshop extension does not introduce a new form of activity: it provides additional internal space for the existing repair and maintenance function and is not associated with any increase in staffing. The

purpose of the extension is to improve the ability to undertake existing activities within an enclosed building, rather than to introduce louder external operations.

7.4 The proposed use of the new buildings would therefore be comparable in noise character to existing and already-permitted employment activity at the site. Servicing and vehicle movements will occur within the established employment context and no materially different noise source has been identified.

7.5 A standalone Noise Impact Assessment is consequently not considered necessary for validation. If a future occupier proposes external plant or an operational activity with materially different acoustic characteristics, that equipment/activity can be assessed at that time and, where necessary, controlled through a planning condition or separate consent.

8.0 Land Contamination Statement

8.1 The validation request appears to have been triggered by the wider site's industrial/employment context. It is important, however, to distinguish the established employment uses elsewhere within the landholding from the areas of ground proposed to accommodate the new development.

8.2 The land on which the new development is proposed is undeveloped land and, so far as the applicant is aware, has not historically been used for activities ordinarily associated with significant land contamination. There is no known history on the development footprint of heavy industrial processing, waste disposal, chemical manufacture or other contaminative land uses.

8.3 The fact that the development is adjacent to an established employment site does not, by itself, demonstrate that the undeveloped ground proposed for the new buildings is contaminated. No evidence has been identified through the applicant's knowledge of the site to indicate a pollutant linkage requiring intrusive investigation at validation stage.

8.4 On that basis, a standalone Phase 1 / intrusive Land Contamination Assessment is not considered proportionate. As a precaution, the applicant would accept a conventional unexpected-contamination condition requiring work to stop and appropriate investigation/remediation if previously unidentified contamination is encountered during groundworks. This provides an appropriate safeguard without imposing unnecessary investigation where no contaminative history has been identified.

9.0 Arboricultural Requirements

9.1 The validation request notes that proposed parking and a building are shown close to existing trees. The existing trees in the relevant part of the site are understood to be relatively immature and are not protected by a Tree Preservation Order. The proposals do not rely upon the removal of protected or mature specimen trees to accommodate the development.

9.2 The proximity of development to young trees can be addressed through detailed construction design. Foundation design can be tailored to avoid significant root damage where necessary, including localised bridging, reduced-dig or other specialist foundation solutions if an individual foundation edge approaches a rooting zone. Similarly, parking construction can adopt permeable or reduced-dig construction where appropriate.

9.3 Practical construction controls can also ensure that retained trees are not adversely affected. These include establishing protective fencing before construction in the vicinity of retained trees, keeping storage and mixing operations away from rooting areas, avoiding unnecessary changes in ground level near stems, and routing new services to avoid significant roots where practicable.

9.4 Given the immature and unprotected nature of the trees, the intention to retain them, and the ability to incorporate appropriate foundation and construction safeguards, a full standalone Arboricultural Impact Assessment/Tree Survey is considered disproportionate for validation. If the decision-maker considers

additional control necessary, a concise tree-protection method statement and final foundation details can be secured by pre-commencement condition.

10.0 Air Quality Assessment / Justification

10.1 The proposal is located within an established rural employment/light-industrial environment and does not introduce a materially different air-quality source. The new units are intended for Class E(g) office, research/development and light-industrial uses, and the workshop extension supports an existing activity rather than establishing a new heavy industrial process.

10.2 No furnaces, chimneys, combustion plant, process stacks, industrial extraction systems or other fixed emission-generating equipment are proposed as part of the application. Nor is any dusty, smoky or fume-generating process proposed. The scheme therefore does not create the type of point-source emission that would normally require dispersion modelling or a specialist Air Quality Assessment.

10.3 The workshop extension will not increase staffing and is intended to improve internal maintenance space. The two new units are modest in scale and are supported by on-site parking and servicing. Any temporary construction dust can be managed through standard good-practice measures and is not, of itself, a reason for a full operational air-quality assessment.

10.4 There is also directly relevant planning history at the same Pencroft/Laugherne Villa employment location. Permission M/24/00216/FUL, approved on 4 June 2024, authorised workshop/light-industrial/storage development in Classes E(g) and B8. The Council's public application document list does not identify a standalone Air Quality Assessment for that scheme, and the permission controlled amenity principally through the use class, landscaping/drainage measures, operating hours and noise-related controls.

10.5 The current proposal is no more air-quality intensive in character: it is focused on Class E(g) light-industrial/office activity and does not include new emission-generating plant. Requiring a standalone Air Quality Assessment would therefore be disproportionate. If a future occupier proposes an activity or fixed plant that materially changes emissions, any necessary planning or environmental-permitting controls can apply at that stage.

11.0 Planning Obligations and Community Infrastructure Levy

11.1 Section 106 Planning Obligations

11.1.1 No draft Section 106 Heads of Terms are proposed because no planning obligation has been identified as necessary to make the development acceptable. The scheme is an employment development and does not generate the typical infrastructure requirements associated with residential development, such as affordable housing, education, public open space or health contributions.

11.1.2 National policy and Regulation 122 of the Community Infrastructure Levy Regulations require a planning obligation to be necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. On the information available, there is no identified impact arising from this scheme that requires mitigation through a legal obligation rather than through the submitted design or, where necessary, a planning condition.

11.1.3 Accordingly, there are no proposed s106 heads of terms at this stage. If a statutory consultee were to identify a specific site-related matter during determination, that matter would need to be considered against the statutory tests; it would not justify requiring an open-ended obligation simply as a validation exercise.

11.2 Community Infrastructure Levy (CIL)

11.2.1 Malvern Hills District Council adopted its Community Infrastructure Levy Charging Schedule on 16 May 2017, with charging commencing on 5 June 2017. Section 8, Table 1 of the adopted schedule sets the Malvern Hills CIL rate for “Industrial and Office” development at £0 per square metre. “All Other Uses” are also shown at £0 per square metre.

11.2.2 The application is for employment development comprising a workshop extension and Class E(g) office/light-industrial units. It therefore falls within the zero-rated industrial/office category of the adopted Charging Schedule. Although the development creates more than 100 sqm of new floorspace, the applicable charging rate is nil and no monetary CIL liability arises.

11.2.3 An Assumption of Liability form is intended to identify the party assuming responsibility for payment where a CIL liability exists. As the chargeable amount for the proposed industrial/office development is £0, there is no positive levy liability to assume. The absence of an Assumption of Liability form is therefore explained by the nil-rate position under the adopted Charging Schedule.

CIL position. The relevant point is not that employment floorspace is outside the CIL regime altogether, but that the adopted Malvern Hills Charging Schedule expressly applies a £0/m² rate to Industrial and Office development. The resulting financial liability is therefore nil.

12.0 Overall Conclusion

12.1 This Addendum provides the additional information requested in the Planning Inspectorate's validation correspondence. It should be read alongside the original Planning and Design Statement and the submitted plans and technical information.

12.2 The proposal delivers clear economic and rural-employment benefits through support for an established business and provision of 864 sqm of flexible new Class E(g) employment floorspace. The site is in Flood Zone 1 and can be safely drained through an infiltration-first SuDS strategy, while foul sewage can be managed using appropriately sized package treatment plant technology in the absence of mains drainage.

12.3 No external lighting, external extraction or other fixed noise/emission-generating plant is proposed. The intended uses are office/light-industrial Class E(g) activities compatible with the established employment context. The undeveloped development areas have no known contaminative history, and the existing immature, unprotected trees can be retained and protected through proportionate construction and foundation design measures.

12.4 No Section 106 obligation has been identified as necessary, directly related or proportionate to the development. The adopted Malvern Hills CIL Charging Schedule applies a £0/m² rate to Industrial and Office development, so no monetary CIL obligation arises.

12.5 Taken together, the information in this Addendum demonstrates that the validation matters can be satisfactorily addressed without unnecessary specialist assessments where the proposal does not generate the relevant impact. The application should therefore be treated as containing sufficient information in respect of the matters addressed in this Addendum.