

Planning Application Response of Planning Policy

Application No:	APP/18/01226
Address:	Land off Larchwood Avenue (Former Stantons Yard, Larchwood Avenue, Havant
Development:	Construction of an 81 bed, four storey hotel (Class C1), associated car-parking, landscaping and ancillary works
Case Officer:	Mr D Eaves
Comments by:	Jade Ellis
Date of Comments:	21 st December 2018

Policy Status:

The [Local Plan \(Core Strategy\)](#) and the [Local Plan \(Allocations\)](#), together with the [Hampshire Minerals and Waste Plan](#), provide the development plan for the borough. In addition, the [Local Plan Housing Statement \(LPHS\)](#) and its guiding principles, adopted December 2016, is also a material consideration.

The following policies and documents are of relevance:

- CS4 Town, District and Local Centres
- CS5 Tourism
- CS14 Efficient Use of Resources
- CS16 High Quality Design
- CS17 Concentration and Distribution of Development within the Urban Areas
- CS19 Effective Provision of Infrastructure
- CS21 Developer Requirements
- DM8 Conservation, Protection and Enhancement of Existing Natural Features
- DM14 Car and Cycle Parking on Development (excluding residential)
- DM17 Contaminated Land
- DM18 Protecting New Development from Pollution
- DM24 Recreational Disturbance to Special Protected Areas (SPAs) from Residential Development
- AL2 Urban Area Boundaries and Undeveloped Gaps between Settlements
- AL3 Town, District and Local Centres
- National Planning Policy Framework (NPPF)
 - Paragraphs 86 to 90
 - Annex 2
- Havant Borough Council Parking SPD (July 2016)

Principle of Development:

The site lies within the urban area as defined by Policies CS17 and AL2 of the Local Plan; these policies seek to concentrate new development within the five urban areas of the borough.

Sequential test

A hotel (Land Use Class C1) is included as an example of tourism development under the definition of a main town centre use in Annex 2 of the NPPF (2018). The site lies more than 300m away from any of the borough's designated town, district and local centres, and is therefore defined as an 'out of centre' development in the context of the NPPF. Though it is recognised that market demand will influence hotel location, paragraph 3.60 of Policy CS5 states that:

“Proposals to develop a hotel outside a designated centre will need to carry out a thorough sequential test to ensure there are no suitable sites in the centres identified in Policy CS4 on town, district and local centres.”

The applicant has submitted a report on the Sequential Test and Impact Test which includes a review of a total of 18 sites, with only 5 sites identified for inclusion in the sequential test. This included a review of sites in Havant and Waterlooville Town Centres, Dunsbury Park (formerly Dunsbury Hill Farm) as well as Langstone Technology Park and the Former BAE Systems Technology Park based on the Council's advice at pre-application stage.

Notably, the applicant's assessment of the BAE Systems Technology Park is that the site could become available in the longer term, but it is understood that the site is not currently being progressed (paragraph 5.24 of the Sequential Test and Impact Test). The site is in fact currently subject of a planning application ref. APP/18/01072 for a mixed-use development including Class C1. As such, at this stage it is not possible to conclude that there are no other sequentially preferable sites available.

Impact assessment

In addition to the above, paragraph 89 of the NPPF indicates that local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500 sq. m). The applicant has provided an impact assessment as part of the supporting documentation accordingly. This does, not however, appear to follow the checklist for applying the impact test provided by [Planning Practice Guidance](#) and is extremely limited. It only provides an explanation of the existing, committed and planned development.

In the first instance, it will therefore be of relevance to determine the scale and form of the proposed development, as well as its characteristics of the proposed development such as the catchment area and target market. In this respect, whilst the submitted Planning Statement contends that Havant and Waterlooville are two distinct markets (the hotel proposal is intended to fulfil the market requirement for the Havant area), no assessment of the likely catchment area or trade draw has been undertaken. If this can be appropriately scoped, an assessment of the 'no development' scenario should also be undertaken in line with the impact test checklist.

Telecommunications Mast:

A telecommunication mast is in the south west of the site. Criterion 8 of Policy CS19 states that development must safeguard the requirements (this includes the access and continued operations) of infrastructure providers.

Given the previously developed nature of the site, Policies DM17 and DM18 are also of relevance. It is recommended that the advice of Environment Health Colleagues is sought accordingly.

Sustainable Construction and High-Quality Design:

As the development is over 500 sq. m, then Policy CS14 is of relevance in terms of requiring the development to the "very good" standard of BREEAM unless shown to be financially or technically unviable. Paragraph 7.30 of the Local Plan (Core Strategy) states that in order to meet the BREEAM standard:

“applicants will be expected to submit a statement of how this has been achieved as part of their planning application”

No statement appears to have been submitted with the application supporting documentation. Clarification from how the applicant intends to meet this requirement is needed.

Parking Provision:

Policy DM14 and the [Havant Borough Parking SPD \(July 2016\)](#) set out the parking standards for new non-residential development in the borough. The parking requirements for a hotel development is highlighted in Table 8 on page 17 of the SPD.

The minimum vehicular parking requirement is “*one space per bedroom*”. The submitted plan shows that 85 vehicular spaces would be provided for the proposed 81-bed hotel; and would therefore accord with the Parking SPD.

The submitted plan indicates 10 cycle parking spaces but does not specify whether these would be for long or short stays. Whilst it is accepted that this is at least the minimum for the number of bedrooms (1 stand per 10 bedrooms), it is questionable whether this number of spaces would be sufficient to meet the needs of staff:

Tree Preservation Order (TPO):

A woodland Tree Preservation Order (TPO 0908) has been placed on the woodland in and around the south and west of the site. As such, the criteria of Policy DM8 are of relevance. The Council’s Arboricultural Officer will be able to provide further advice on the matter.

Developer Contributions:

The Solent Recreation Mitigation Strategy (SRMS) states that:

“new hotels and other holiday/tourist accommodation....is a residential-related use with the potential to generate additional recreational visits to the SPA(s)” and “hotel accommodation will be assessed on a case-by-case basis” (paragraphs 6.10 and 6.11).

However, given the location and nature of the accommodation, it is considered guests will be predominantly business people, and therefore unlikely to spend time walking or pursuing other recreational activities at the coast. Nevertheless, it is recommended that the views of the Council’s Ecologist will be able to provide further advice on whether the SRMS financial contribution will be payable in accordance with Policy DM24.

The development would also be required to pay developer contributions in line with Policy CS21.

Recommendation:

At this stage there is insufficient information to conclude that there are no sequentially preferable sites, and that the impact on Havant and Waterlooville Town Centres is not significantly adverse.