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Havant Borough Council
Planning Services
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By e-mail

Our Ref: 1122.8.TGD.AJO.Fn

Your Ref: APP/18/01226

4th March 2019

F.A.O. David Eaves, Principal Planning Officer

Dear David,

Re: Application Ref. APP/18/01226
Construction of an 81-bed, four-storey hotel (Class C1), associated car-parking,
landscaping and ancillary works
Land off Larchwood Avenue (Former Stantons Yard), Larchwood Avenue, Havant

Following our submission of the above referenced planning application, we write to provide further information and clarification, following receipt of your correspondence of 5th February 2019.

For ease of cross-reference we have followed the same order of issues as set out in your correspondence.

Sequential Test & Impact Assessment

Sequential Test

It is advised in your correspondence of 5th February that our assessment of the BAE Systems Technology Park site is incorrect, as the site is currently the subject of planning application ref. APP/18/01072, for a mixed-use development including Class C1. As such, you advise that it is not possible to conclude that there are no other sequentially preferable sites available.

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It was confirmed in paragraph 5.14 of the submitted 'Sequential Test & Impact Assessment', that Travelodge have identified a hotel requirement in both the Havant and Waterlooville areas and see the towns as two distinct markets. It was also confirmed that this application proposal is seeking to fulfil the market requirements of the Havant area and that Travelodge remain open to the prospect of sites that may also become available to suit the Waterlooville market. This would include potential interest in a hotel use at the BAE Systems Technology Park (which falls within the Waterlooville market area) in the event that planning permission is granted and associated operators are secured within that mixed-use site to make it a viable option to progress.

At this time, planning permission has not been granted at the BAE site and it therefore remains unavailable. As such, whilst the concluding comments in relation to this site need to be updated, the overall conclusion remains unchanged and as such the overall findings of the 'Sequential Test & Impact Assessment' remains the same.

As was also confirmed at para. 5.7 of the submitted 'Sequential Test & Impact Assessment', there is no requirement in the NPPF for hotel operators to consider changes to their business model. This principle has also been upheld by case law in the cases of both *Tesco Stores v Dundee City Council* and *R v North Lincolnshire Council* in 2012. The full judgement of the latter case was enclosed at Appendix 4 of the 'Sequential Test & Impact Assessment' and confirmed at para. 61 that;

"developments of this kind are generated by the developer's assessment of the market that he seeks to serve. If they do not meet the sequential approach criteria, bearing in mind the need for flexibility and realism to which Lord Reed refers, they will be rejected. But these criteria are designed for use in the real world in which developers wish to operate, not some artificial world in which they have no interest in doing so."

The Sequential Test submitted with the application was prepared on the basis of the pre-application advice received from the Local Planning Authority (LPA), which advised that both Havant and Waterlooville town centres should be considered. However, this was not borne out of a detailed understanding of hotel market characteristics. It was informed only by the geographic proximity of the two town centres.

Notwithstanding, that for the reason set out the conclusion of the Sequential Test still stands (given that in Planning and Sequential Test terms, the BAE site is not currently available), the Applicant would contend that for the reasons also indicated, it is only the Havant town centre and surrounding area that required consideration and assessment in this case.

The Applicant is best placed to understand their own market areas and the key drivers that direct the search for specific sites and satisfy particular market criteria. Insofar as market areas are concerned the Applicant sees Havant and Waterlooville as two separate and distinct market areas with smaller catchment areas than was directed by the LPA for consideration in the Sequential Test. In reality, the defined Havant town centre, set out in the submitted Sequential Test comprised the area of search that is 'proportionate' and 'appropriate' in this case. Furthermore, the consideration and bringing forward of the application site within the Havant market area, would not preclude interest from suitable sites that may also become available in the Waterlooville market area.

As such, it remains demonstrated, at the current time that there are no other more sequentially preferable sites available for the type of development being proposed at the application site.

Impact Assessment

We are asked to review the comments set out in your correspondence of 5th February in relation to the Impact Assessment.

It was confirmed at para. 6.1 of 'Sequential Test and Impact Assessment that considering the impact of proposals is required only in relation to retail, office and leisure development, as defined at Annex 2 (Glossary) to the NPPF. In this context the proposed 'hotel' use is defined within 'Arts, Culture and Tourism Development'. As such, a formal and detailed impact assessment is not required. However, in the interests of robustness, an indicative assessment has been made of the impact of the proposed hotel development on the town centres, having regard to out of town hotel development being at the expense of potential town centre hotel development. This is the key consideration set out in National Planning Policy Guidance, which states;

"The purpose of the test is to ensure that the impact over time (up to 5 years (10 years for major schemes)) of certain out-of-centre and edge-of-centre proposals on existing town centres is not significantly adverse."

The impact assessment provided a summary of existing hotels in town centre; edge-of-centre; and out-of-centre locations. This confirmed that there is only one hotel use within Havant town centre and none within Waterlooville town centre. It also confirmed that there are no plans or planning applications for further hotel uses in either of the defined town centres, which the proposed development at Larchwood Avenue could otherwise adversely impact on.

In this regard, it is academic to consider that Havant and Waterlooville are each their own market area, given that there are no hotel uses in Waterlooville town centre for an out-of-centre hotel use to impact upon. Furthermore, the one existing hotel use in Havant would appear to not have been adversely impacted by the already existing range of, edge-of-centre and out-of-centre hotel uses in the area. Given that there is only one existing hotel in the town centre which also operates within a different hotel market sector and being set in a period building with associated pub, no material impact is expected upon the future trading performance of this hotel.

Design, Layout and Landscaping

In response to points raised in your correspondence of 5th February, a number of revised application drawings are submitted with this enclosure comprising of;

- i) Dwg No. 4231-AL(0)001 RevC – Site Location Plan
- ii) Dwg No. 4231-AL(0)002 RevD – Block Plan;
- iii) Dwg No. 4231-AL(0)110 RevL – Ground Floor Plan Proposed;
- iv) Dwg No. 4231-AL(0) 111 RevG – First Floor Plan Proposed;
- v) Dwg No. 4231-AL(0)112 RevG – Second Floor Plan Proposed;

- vi) Dwg No. 4231-AL(0)113 RevG – Third Floor Plan Proposed;
- vii) Dwg No. 4231-AL(0)114 RevC – Roof Plan Proposed;
- viii) Dwg No. 4231-AL(0)115 RevB – Levels Plan Proposed;
- ix) Dwg No. 4231-AL(0)116 – Fire Appliance Swept Path Drawing;
- x) Dwg No. 4231-AL(0)120 RevD – Proposed Elevations;
- xi) Dwg No. 4231-AL(0)121 RevA – Proposed North Elevation Signage Location;
- xii) Dwg No. 4231-AL(0)122 RevA – Bin and Cycle Store Proposed Elevations;
- xiii) Dwg No. 4231-AL(0)130 RevB – Proposed Sections; and
- xiv) Dwg No. 4231-AL(0)131 RevA – Proposed Site Sections.

The proposed pedestrian connectivity is illustrated on drawing no. 4231-AL(0)002 RevC – Block Plan. This has been improved from the initially proposed site layout and typically comprises of an integrated on/off road route between Larchwood Avenue and the hotel entrance. This is a typical characteristic of site layout at hotel developments where both pedestrian and traffic movements are slow and intermittent and a large proportion of movements will be confined to movement between parking spaces and the hotel entrance.

Drawing Nos. 4231-AL(0)110 RevK (Ground Floor Plan Proposed; 4231-AL(0)115 RevA (Levels Plan Proposed) and 4231-AL(0)131 (Proposed Site Sections) provides further plan, levels and sectional details in relation to the retaining wall indicated on the southern boundary.

Drawing No. 4231-AL(0)115 RevA (Levels Plan Proposed) includes additional topographical data to better illustrate the relationship between the existing landform and the proposed development throughout the site, particularly in relation to the retaining wall along the southern boundary.

Drawing No. 4231-AL(0)110 RevK (Ground Floor Plan Proposed) shows the location of 6 disabled parking spaces accessed immediately outside of the hotel entrance.

Drawing No. 4231-AL(0)110 RevK (Ground Floor Plan Proposed) also shows the location of both long and short stay cycle parking spaces in as closer a location as is practically possible to the hotel entrance, having appropriate regard to the locational requirements of other development features.

Drawing No. 4231-AL(0)120 RevC (Proposed Elevations) confirms the proposed use of materials. It is proposed to retain render as the primary surface material, however it is proposed to introduce contrasting panels of render to enhance the visual aesthetic of the proposed building. Given the limited quality and character of the surrounding architecture and the largely absent external visibility of the site, it is considered that there is no reasonable support for a more ambitious architectural response in this instance.

Drawing No. 4231-AL(0)120 Rev C (Proposed Elevations) also shows improved elevational treatment of the east facing elevation which will enhance the visual aesthetic of the proposed building.

Insofar as boundary details; and soft and hard landscaping details are concerned, these are indicated on drawing nos. 4231-AL(0)110 RevK (Ground Floor Plan Proposed); 4231-AL(0)115 RevA (Levels Plan Proposed); and 4231-AL(0)131 (Proposed Site Sections). In terms of full details relating to these matters, this is not available at the current time and it would be

usual for this to be secured by an appropriately worded planning condition, in the event that planning permission is granted.

Highways Matters

It is noted that the Highways Development Engineer confirms that spare capacity exists within the highway network, which can accommodate the out of peak traffic flow patterns from the proposed development.

Insofar as the internal ASDA road management is concerned, the Applicant has received confirmation that at this time, ASDA is satisfied with its management of the internal road network during the isolated busy periods and has no plans to carry out any works in this regard.

At this stage, the LPA's collective response insofar as the submitted Interim Travel Plan is concerned has also confirmed that a full Travel Plan including all sustainable modes of transport, will need to be submitted and approved before the hotel could be occupied. In consideration of this and the additional comments provided by the Council's Environmental Control Officer, it is confirmed that all comments will be considered and where appropriate, will be actioned by way of a full Travel Plan, to be submitted prior to occupation of the development.

Ecology/ SPA Impacts

Insofar as the County Ecologists comments are concerned, please find the final updated Preliminary Ecological Assessment, submitted with this enclosure. This confirms final details and results as they relate to the additional dormouse survey work that has been conducted. We also enclose a detailed response from our Ecology Consultant to the specific consultation response that was provided by the County Ecologist.

It is indicated in your correspondence that there are potential contribution requirements under the Solent Recreation Mitigation Strategy, which are being considered further with Natural England and the County Ecologist. We still await further confirmation in this regard. Are you able to advise?

The detailed comments made by Natural England in relation to the potential impacts of nutrient increase seem to apply to proposals for increased housing growth. Given that this proposal is for a hotel development, it would seem that these comments do not apply in this instance.

Environmental Health/ Contamination

We can confirm that at this stage, the final roofing material has not yet been selected, but it is confirmed that it will likely take the form of a single-ply membrane and will not comprise of potentially polluting sheet roofing, as indicated.

Insofar as the culvert is concerned, the Applicant is aware of the presence of this and intends to leave it in-situ. The final detailed design of the development will accommodate this.

Arboricultural Issues

A detailed Tree Protection Plan will follow under separate cover.

Telecommunications Mast

You have asked for details of access and maintenance provisions and any discussions with the mast operators that may have taken place.

No direct discussions have taken place between the Applicant and the mast operators, however details of access and maintenance provisions associated with the existing telecommunications mast located in the southwest of the site are covered by a lease arrangement between ASDA Stores Ltd and crown Castle UK Ltd. This conveys rights of access to the mast at all times, to the telecoms operator. It also includes provisions relating to the installation of a temporary generator, if required and to the maintenance of the power supply to the telecoms facility. These provisions will be upheld and conveyed upon the Applicant insofar as it relates to the application site.

Sustainable Construction and High Quality Design

As requested by your correspondence of 5th February please find enclosed with this submission the BREEAM Pre-Assessment that sets out a combined package of proposed measures to achieve the 'Very Good' standard of BREEAM.

Fire and Rescue

The consultation response of Hampshire Fire and Rescue Service is duly noted. The Applicant will comply with all relevant Building Regulations and Legislative requirements insofar as fire and rescue are concerned. Drawing No. 4231-AL(0)116 (Fire Appliance Swept Path Drawing) is submitted to show the ability of fire service vehicles to access and egress the application site.

At this stage, we trust that the additional information has adequately addressed the comments received so far and look forward to your further consideration of the information submitted.

Yours sincerely



Amanda Olley MRTPI

Director

On behalf of Summit Planning Associates Ltd

Encls. Amended Drawings Package Referenced Above
Preliminary Ecological Appraisal and Dormouse Survey (Feb 2019)
DeltaSimons Response to County Ecologist Comments (Feb 2019)
BREEAM Pre-Assessment Rev02 (Nov 2018)