

SUPPORTING PLANNING STATEMENT

TIGER DEVELOPMENTS & TRAVELODGE

LAND OFF LARCHWOOD AVENUE (FORMER STANTON'S YARD)
HAVANT
PO9 3QL

NOVEMBER 2018

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Appendix 1: Copy Pre-Application Request

Appendix 2: Copy Pre-Application Response

1. INTRODUCTION

- 1.1 Summit Planning Associates has been appointed by the applicant Tiger Developments Ltd/ Travelodge, to prepare a planning application submission for the construction of an 81-bed, four-storey hotel (use class C1), associated car-parking, landscaping and ancillary works; at Land off Larchwood Avenue, Havant, PO9 3QL. The site falls within the administrative boundary of Havant Borough Council.
- 1.2 The historic use of the site has been ceased for some time and the site has been cleared of all previous buildings and structures. The site is currently vacant and the main area is covered with uneven concrete slabs and overgrown greenery.
- 1.3 The Design and Access Statement that accompanies the application submission has set out a clear narrative of the proposed development in terms of its detailed design, context, layout, setting, scale and appearance. In summary, the application site is located in close proximity to the A3(M), which lies just beyond the western boundary. The buildings surrounding the site are largely commercial in nature. There is a large ASDA superstore located to the south and a B&Q store to the north. To the immediate east of the site there is a KFC restaurant and drive-thru and beyond the wider eastern boundary the surrounding area becomes more residential in character.
- 1.4 The site is circa 0.72ha in size with the majority of it being open and flat in topographical terms. Sloping ground and vegetation, including tall trees occupy the edge of the site. The site is predominantly flat with a very gentle slope from east to west. There is a steep level increase at the southern edge of the site where the slope extends some 4-5m in height. There is also a pre-existing mobile phone mast located immediately outside of the east/ southeast boundary of the application site.

PLANNING HISTORY

- 1.5 Application Ref. 03/54261/004 for the determination as to whether prior approval was required for the siting and appearance of 6no. antennas on the existing 30m high lattice tower, a ground based equipment cabin and ancillary development including strengthening of tower, extension of compound and new fencing;

considered that prior approval was required and permitted the proposal; in April 2003.

- 1.6 Application Ref. 02/54261/003 for the determination as to whether prior approval was required for the siting and appearance of 3no. antennas and 1no.300mm diameter dish on the existing 30m high lattice tower; the relocation of an existing 600mmdish on the tower; 6no. equipment cabinets at ground level plus ancillary works. Two existing antennas removed from the tower; considered that prior approval was required and permitted the proposal; in December 2002.
- 1.7 Application Ref. 00/54261/002 for the determination as to whether prior approval was required for the installation of 2 dishes on an existing mast and ancillary development; considered that prior approval was required and permitted the proposal in December 2000.
- 1.8 Application Ref. 95/54261/001 for the retrospective approval of a taxi office and associated parking was APPROVED in May 1996.
- 1.9 Application Ref. 95/54261/000 for the erection of a radio base station to include 30m mast to support 6 sector antenna, 4 communication dishes and equipment cabin was APPROVED in March 1995.
- 1.10 Application Ref. 24545/3 for the erection of Marley building for storage use was APPROVED in July 1983.

PROPOSED DEVELOPMENT

- 1.11 This application seeks planning permission for the construction of an 81-bed, four-storey hotel (use class C1), associated car-parking, landscaping and ancillary works.
- 1.12 The following documents are also submitted to support consideration of the application;
- i) Drawing No. 4231-AL(0)001 RevB – Site Location Plan;
 - ii) Drawing No. 4231-AL(0)002 RevB – Block Plan;

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- iii) Drawing No. 4231-AL(0)110 RevH – Proposed Ground Floor Plan;
 - iv) Drawing No. 4231-AL(0)111 RevE – Proposed First Floor Plan;
 - v) Drawing No. 4231-AL(0)112 RevE – Proposed Second Floor Plan;
 - vi) Drawing No. 4231-AL(0)113 RevE – Proposed Third Floor Plan;
 - vii) Drawing No. 4231-AL(0)114 RevA – Proposed Roof Plan;
 - viii) Drawing No. 4231-AL(0)120 RevB – Proposed Elevations;
 - ix) Drawing No. 4231-AL(0)130 RevA – Proposed Sections;
 - x) Design and Access Statement (Nov 2018) (Holmes Miller);
 - xi) Supporting Planning Statement (Nov 2018) (Summit Planning Associates);
 - xii) Sequential Test and Impact Test (Nov 2018) (Summit Planning Associates);
 - xiii) Arboricultural Survey (Oct 2018) (deltasimons);
 - xiv) Drainage Strategy Statement (Sept 2018) (Curtins);
 - xv) Geo-Environmental Site Investigation (June 2018) (deltasimons);
 - xvi) Transport Assessment (Nov 2018) (Curtins);
 - xvii) Interim Travel Plan (Nov 2018) (Curtins);
 - xviii) Preliminary Ecological Appraisal (July 2018) (deltasimons);
 - xix) Hazel Dormouse Survey Scope of Works (Nov 2018) (deltasimons); and
 - xx) Noise and Vibration Assessment (July 2018) (Entran)

PRE-APPLICATION CONSULTATION

- 1.13 The applicant has sought pre-application advice in relation to the proposal. A request was submitted in June 2018, which included indicative floor plans and elevations for comment and discussion, comprising of an 80/81-bed Travelodge hotel (**Appendix 1**).
- 1.14 A pre-application meeting took place with an Officer of Havant Borough Council on 18th July 2018 with a follow-up response received on 14th September 2018 (**Appendix 2**).
- 1.15 The pre-application response confirmed that the main issues in the consideration and determination of any planning application would be;
- i) The principle of development (including sequential test and impact test);

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- ii) Transport/ highway impacts;
 - iii) Impact on the character and appearance of the area;
 - iv) On-site constraints;
 - v) Effect on neighbours residential amenities;
 - vi) Employment;
 - vii) Flood Risk/ Drainage;
 - viii) Ecology;
 - ix) Contamination;
 - x) Developer Contributions/ S106 requirements;
 - xi) Public Engagement; and
 - xii) Other matters.

1.16 In summary, the pre-application advice confirmed that, given the out-of-centre location of the application site, the proposed development raises in-principle issues that would need to be satisfactorily addressed through the sequential test and impact test. It was confirmed that if those matters could be satisfactorily addressed, a subsequent planning application would also need to provide a suitable response to the other issues identified.

2. PLANNING POLICY CONSIDERATIONS

- 2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that any determination under the Planning Acts, should be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 2.2 In this instance the Development Plan for Havant Borough Council currently comprises of the policy guidance set out in the National Planning Policy Framework (NPPF), supported by the National Planning Practice Guidance (NPPG); Havant Borough Local Plan (Core Strategy) (Adopted March 2011); and Havant Borough Local Plan (Allocations) (Adopted July 2014). Within this policy framework, the guidance and policies relevant to the consideration of the application proposal are set out below.

NATIONAL PLANNING POLICY FRAMEWORK (NPPF) (JULY 2018)

- 2.3 Applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The NPPF comprises part of the development plan for authority areas and must be taken into account in both the preparation of local and neighbourhood plans and in planning decisions.
- 2.4 An updated and revised NPPF was issued in July 2018.
- 2.5 At the heart of the NPPF remains the principle that the planning system is to contribute to the achievement of sustainable development. Insofar as decision-taking is concerned, this continues to mean;
- 1) approving development proposals that accord with an up-to-date development plan without delay; or
 - 2) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - i) the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

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- ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

2.6 In general terms this continues to accord with the general principles of the previous version of the NPPF.

2.7 Insofar as decision-making is concerned, paragraph 38 of the revised NPPF also confirms that Local Planning Authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers, permissions in principle and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

2.8 Paragraph 48 of the revised NPPF confirms that Local Planning Authorities may give weight to relevant policies in emerging plans, according to;

- i) The stage of preparation of the emerging plan (i.e. the more advanced, the greater the weight can be given);
- ii) The extent to which there are unresolved objections to relevant policies (i.e. the less unresolved objections, the greater the weight can be given); and
- iii) The degree of consistency of the relevant policies in the emerging plan with the policies and guidance of the NPPF (i.e. the closer emerging policies are to the NPPF, the greater the weight can be given).

2.9 Insofar as ensuring the vitality of town centres is concerned, the NPPF states that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Para. 85 identifies a number of criteria/ objectives to achieve this, including;

“where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to

the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre."

- 2.10 Para. 86 confirms that local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. It further confirms that main town centre uses should be located in town centres, then in edge-of-centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out-of-centre sites be considered. Annex 2 (Glossary) of the NPPF confirms that 'Main town centre uses' are defined as;

"Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)."

- 2.11 Para. 87 states that when considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Both applicants and local planning authorities are expected to demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.
- 2.12 Para. 89 confirms that when assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, an impact assessment will also be required if the development is over a proportionate, locally set floorspace threshold. If there is no locally set threshold, the default threshold is 2,500m². This should include assessment of;
- a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and

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- b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).
- 2.13 In the event that an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the considerations in para. 89, the NPPF states that the application should be refused.
- 2.14 Insofar as promoting sustainable transport is concerned para. 102 advises that transport issues should be considered from the earliest stage of plan-making and development proposals, so that;
- i) The potential impacts of development on transport networks can be addressed;
 - ii) Opportunities to promote walking, cycling and public transport are identified and pursued;
 - iii) The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account; and
 - iv) Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.
- 2.15 Para. 109 continues to confirm that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or if the residual cumulative impact on the road network would be severe.
- 2.16 Para. 111 confirms that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that likely impacts of the proposal can be assessed.
- 2.17 Paras. 117 of the NPPF advises that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Para. 118 goes on to advise various objectives that planning policies and
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decisions should aim to achieve, including giving substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs; and promoting and supporting the development of under-utilised land and buildings.

2.18 At paragraph 124 the revised NPPF states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. It continues to identify that good design is a key aspect of sustainable development that helps make development acceptable to communities. Para. 128 advises that design quality should be considered throughout the evolution and assessment of individual proposals. Para. 130 goes on to confirm that where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development.

2.19 Insofar as meeting the challenge of climate change, flooding and coastal change is concerned, para. 163 of the revised NPPF confirms that when determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere; and where appropriate, applications should be supported by a site-specific flood-risk assessment.

2.20 Insofar as habitats and biodiversity are concerned, para. 175 of the revised NPPF sets out the principles that LPA's should apply when determining planning applications.

2.21 Insofar as ground conditions and pollution is concerned, para. 179 confirms that where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.

NATIONAL PLANNING PRACTICE GUIDANCE (NPPG) (NOV 2016, Updated Sept 2018)

2.22 The NPPG supports the NPPF and the wider planning system.

2.23 Insofar as the sequential test relates to the vitality of town centres, the NPPG advises;

"It is for the applicant to demonstrate compliance with the sequential test (and failure to undertake a sequential assessment could in itself constitute a reason for refusing permission). Wherever possible, the local planning authority should support the applicant in undertaking the sequential test, including sharing any relevant information. The application of the test should be proportionate and appropriate for the given proposal. Where appropriate, the potential suitability of alternative sites should be discussed between the developer and local planning authority at the earliest opportunity.

The checklist below sets out the considerations that should be taken into account in determining whether a proposal complies with the sequential test:

- With due regard to the requirement to demonstrate flexibility, has the suitability of more central sites to accommodate the proposal been considered? Where the proposal would be located in an edge of centre or out of centre location, preference should be given to accessible sites that are well connected to the town centre. Any associated reasoning should be set out clearly.
- Is there scope for flexibility in the format and/ or scale of the proposal? It is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.
- If there are no suitable sequentially preferable locations, the sequential test is passed.

2.24 Insofar as how locational requirements of the sequential test should be considered, the NPPG advises that the sequential test should recognise that certain town centre uses have particular market and locational requirements, which mean that they may only be accommodated in specific locations. It further advises that robust justification must be provided where this is the case and land ownership in itself does not provide such a justification.

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- 2.25 Insofar as promoting viability is concerned, the NPPG states that the sequential test seeks to deliver the government's 'town centre first' policy. However, as promoting new development in town centre locations can be more expensive and complicated than building elsewhere, local planning authorities need to be realistic and flexible in terms of their expectations.
- 2.26 Insofar as using the impact test in decision-taking is concerned, the NPPG states that it should be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible. Ideally, applicants and local planning authorities should seek to agree the scope, key impacts for assessment and level of detail required in advance of applications being submitted. It also confirms that the impact test will not apply to all main town centre uses. It relates only to retail, office and leisure development.
- 2.27 It is also confirmed that, as a guiding principle, impact should be assessed on a like-for-like basis in respect of that particular sector.

HAVANT BOROUGH LOCAL PLAN (CORE STRATEGY) (ADOPTED MARCH 2011)

- 2.28 **Policy CS4: Town, District and Local Centres;** concerns itself with accommodating approximately 13,000 square metres (net) of new comparison goods retail floorspace within town and district centres up to 2016. It further confirms that planning permission will be granted for appropriate town centre development proposals that:
1. Promote and enhance the following hierarchy of identified centres as shown on the Proposals Map:
Town Centres (Havant and Waterlooville)
District Centres (Cowplain, Emsworth, Leigh Park and Mengham/ Gable Head)
Local Centres (Bedhampton, Crookhorn, Grassmere Way, Hambledon Parade, Middle Park Way, Milton Road, Purbrook, Rails Lane, West Town and Widley)
 2. Enhance the evening economy of the town and district centres;
 3. Retain and enhance local markets;
 4. Support small and independent businesses; and
 5. Encourage high quality, mixed-use development in designated centres that retain active ground floor frontages.

2.29 The supporting text to policy CS4 (Para 3.39) confirms that ***"All applications for the development of town centre uses and in particular new retail floorspace outside designated centres will need to demonstrate in a robust and transparent manner the application of the sequential approach to site selection, an impact assessment and all other relevant tests set out in current government policies"***.

2.30 **Policy CS5: Tourism**, states that planning permission will be granted for appropriate development proposals around the borough that;

1. Provide sustainable and small scale recreational opportunities;
2. Provide hotel and other types of tourist accommodation;
3. Safeguard existing tourist facilities, hotels, holiday centres and caravan parks;
and
4. Improve existing tourist facilities, hotels, holiday centres and caravan parks.

2.31 The supporting text to policy CS5 (Para. 3.60) confirms that hotels are defined as a main town centre use. It further confirms that town centre locations will be favoured for new hotels in order to promote their vitality and viability, whilst recognising that market demand will influence hotel location. It reiterates the need for hotel proposals outside of a designated centre to satisfy the sequential test, to ensure there are no suitable sites in the centres identified in Policy CS4 on town, district and local centres.

2.32 **Policy CS16: High Quality Design**, states that planning permission will be granted for development that is designed to a high standard, which helps to create places where people want to live, work and relax. It then goes on to set out a number of objectives that all development should demonstrate in its design including;

- i) Responding to, drawing inspiration from and respecting local context;
- ii) Producing a positive relationship between buildings, streets and spaces, both existing and proposed;
- iii) Contributing to the improvement of the public realm close to the development, particularly sites close to town, district and local centres and

other priority regeneration areas, by using high quality hard and soft landscaped material;

- iv) Inclusivity by considering the needs of those with disabilities;
- v) Maximising opportunities for mixed-use developments, particularly in town and district centres;
- vi) Mitigating negative environmental impacts through sustainable design and construction methods, resource efficiencies and the provision of facilities for waste recycling; and
- vii) Adapting to the changing needs of the users and the changing climate over the lifespan of the building.

2.33 Policy CS17: Concentration and Distribution of Development within the Urban Areas, states that development will be permitted that makes the most effective use of land in the borough by granting planning permission that;

1. Concentrates new housing, employment, retail, leisure and other development within the five urban areas of Havant, Leigh Park, Waterloo, Emsworth and Hayling Island, as shown on the Proposals Map;
2. Prioritises development on previously developed land, including redundant, derelict or underused land and buildings within the urban area; and
3. Broadly distributes the new housing and employment development in the five areas of the borough as indicated on the Spatial Distribution Map (key diagram).

2.34 Policy CS20: Transport and Access Strategy, sets out a number of objectives including; a 'Reduce, Manage and Invest Strategy'; Improving accessibility to goods, services and employment; promoting equality in the transport system; ensuring that highway design responds positively to the characteristics of the area; maintains or improves the range of transport modes; and improves highway, cycling and pedestrian links.

2.35 Policy CS21: Developer Requirements, states that development will be permitted if on-site and / or off-site infrastructure requirements are met.

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- 2.36 **Policy DM6: Coordination of Development**, states that proposals will only be permitted where they do not undermine the future development potential of adjacent sites.
- 2.37 **Policy DM10: Pollution**, states that development that may cause pollution of water, air or soil or pollution through noise, smell, smoke, fumes, gases, steam, dust, vibration, light, heat, electromagnetic radiation and other pollutants will only be permitted when meeting relevant criteria.
- 2.38 **Policy DM11: Planning for More Sustainable Travel**, states that the Council will seek to ensure that every opportunity is taken to increase integration of sustainable travel modes and availability of non-motorised modes by appropriate measures.
- 2.39 **Policy DM12: Mitigating the Impacts of Travel**, states that new developments will be required to mitigate their travel impact, including the environmental impacts of travel and impacts on amenity, health and climate change.
- 2.40 **Policy DM14: Car and Cycle Parking on Development (excluding residential)**, states that development will only be permitted where it provides parking for cars, motor cycles and cycles in accordance with the relevant standards. Such parking provision must be appropriately located in relation to the development and be practical for its intended use.

HAVANT BOROUGH LOCAL PLAN (ALLOCATIONS) (ADOPTED JULY 2014)

- 2.41 **Policy AL1: Presumption in Favour of Sustainable Development**, states that the Council will take a positive approach to development proposals that reflects the presumption in favour of sustainable development. It will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible and to secure development that improves the economic, social and environmental conditions in the area. It also confirms that planning applications that accord with the policies in the local plan will be approved without delay, unless material considerations indicate otherwise.
- 2.42 **Policy AL2: Urban Area Boundaries and Undeveloped Gaps between Settlements**, identifies the urban area boundaries for Emsworth, Havant and Bedhampton,
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Hayling Island, Leigh Park and Waterlooville. It further confirms that the undeveloped gaps are those areas between the urban area boundaries and the neighbouring boundaries with Portsmouth, Winchester, East Hampshire and Chichester.

2.43 **Policy AL3: Town, District and Local Centres**, confirms that planning permission will be granted for development proposals that;

1. Provide main town centre uses in the town, district and local centres as defined on the Policies Map, and so contribute to their vitality and viability;
2. Promote and enhance the primary shopping areas of the town and district centres;
3. Retain at least 50% of the units in an unbroken run of primary frontage as defined on the Policies Map in retail (A1) use;
4. Retain at least 25% of the units in an unbroken run of secondary frontage as defined on the Policies Map in retail (A1) use;
5. Generate pedestrian activity within the primary shopping area by being open during the day to visiting members of the public; and
6. Provide a shopfront within the primary shopping area with a well designed and appropriate display window.

2.44 The supporting text to policy AL3 (Para. 2.12) reaffirms that main town centre uses such as shops, restaurants, hotels, offices, arts and community facilities should be located in town, district and local centres.

2.45 **Policy HB3: Havant and Bedhampton Mixed Use Allocations**, sets out a number of sites that are allocated for mixed use development within the defined Havant town centre area.

2.46 **Policy WA2: Waterlooville Mixed Use Allocations**, sets out a number of sites that are allocated for mixed use development within the defined Waterlooville town centre.

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- 2.47 **Policy DM17: Contaminated Land**, states that planning permission will be granted for development on or near contaminated land where an appropriate investigation of potential risks is undertaken by the developer and identified risks are mitigated.
- 2.48 **Policy DM18: Protecting New Development from Pollution**, states that planning permission will be granted for development proposals provided that projected levels of air, noise, vibration, light, water or other pollution do not have significant negative affect on the amenity of future occupiers or users of the proposed development.

3. PLANNING CONSIDERATIONS

- 3.1 As was stated at para. 2.1 applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 3.2 Section 2 of this Supporting Planning Statement has identified the adopted policy framework that is relevant to the consideration of the proposal. The starting point is the adopted policies of the Havant Borough Local Plan (Core Strategy) (adopted March 2011) and the Havant Borough Local Plan (Allocations) (adopted July 2014).
- 3.3 The pre-application response received from Havant Borough Council in September 2018 (**Appendix 2**) confirmed that the main issues in the consideration and determination of any planning application would be;
- i) The principle of development (including sequential test and impact test);
 - ii) Transport/ highway impacts;
 - iii) Impact on the character and appearance of the area;
 - iv) On-site constraints;
 - v) Effect on neighbours residential amenities;
 - vi) Employment;
 - vii) Flood Risk/ Drainage;
 - viii) Ecology;
 - ix) Contamination;
 - x) Developer Contributions/ S106 requirements;
 - xi) Public Engagement; and
 - xii) Other matters.

Principle of Development (including Sequential Test and Impact Test)

Principle of Development

- 3.4 As confirmed at para. 1.1, this application seeks planning permission for the construction of an 81-bed, four-storey hotel (use class C1), associated car-parking, landscaping and ancillary works.

3.5 The pre-application response received from Havant Borough Council (**Appendix 2**) has confirmed that the proposed hotel use fits within the definition of a main Town Centre use as defined by the National Planning Policy Framework. It is further confirmed that the application site is not allocated within a main town centre under policies CS4 of the Havant Borough Local Plan (Core Strategy) (2011) and AL3 of the Havant Borough Allocations Plan (2014). As such, the application site is considered to be an out-of-centre site.

3.6 Whilst it is recognised that market demand will influence hotel location, para. 3.60 of policy CS5 states;

“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 centres identified in Policy CS4 on town, district and local centres.”

3.7 Given the above, in the absence of an assessment to demonstrate that there are no other sequentially preferable sites (for a main town centre use), the pre-application advice confirmed that a policy objection to the proposal would arise, in the first instance.

Sequential Test

3.8 Part 7 of the NPPF, ‘Ensuring the vitality of town centres’ confirms the tests to be applied to development proposals for town centre uses located away from such centres. It confirms that the two tests comprise of the sequential test and the impact test.

3.9 The sequential test is necessary to identify whether there are preferable sites for a development incorporating town centre uses, within the centre.

3.10 As required by National Policy (NPPF) and Policy CS5 of the Havant Borough Local Plan (Core Strategy) (2011), a sequential test has been carried out in relation to the development proposal. The findings of the sequential test have been set out in a report that is submitted, in support of the application proposal.

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- 3.11 As guided by the Local Planning Authority, a wide search area has been considered for the sequential test, comprising of the two main defined town centres of Havant and Waterlooville and the surrounding edge-of-centre areas to ensure a thorough and robust search. The defined town centre areas are enclosed at Appendix 1 and 2 of the submitted Sequential Test and Impact Assessment report. It should be noted that Travelodge have identified a hotel requirement in both the Havant and Waterlooville areas and see the towns as two distinct markets. This application proposal is seeking to fulfil the market requirement of the Havant area and Travelodge remain open to the prospect of sites that may become available to suit the Waterlooville market.
- 3.12 In summary, a total of 18 sites were reviewed as part of the sequential test. 13 of these have been dismissed as, not suitable for inclusion within the sequential test assessment itself for varying reasons, including; already implemented; allocated mixed-use sites that were not earmarked for hotel uses; site constraints that would preclude a hotel use; and site size. The 5 remaining sites were considered appropriate for inclusion in the sequential test. They have been appropriately considered and dismissed on the grounds of lack of availability, suitability and deliverability within the timescales required by the applicant. Full details of the reasoning for this are set out in the submitted sequential test report.
- 3.13 Overall, the sequential test search has revealed a handful of sites requiring due consideration regarding their development potential for hotel development. It has demonstrated that, at the current time, there are no other more sequentially preferable sites available for the type of hotel development being proposed at the application site.
- 3.14 As such, the application proposal passes the sequential test, as there are no sequentially preferable sites within the identified search area, for a main town centre use. On this basis, there should be no in-principle, policy objection to the application proposal as it is demonstrated that the proposal accords with the policy provisions of the NPPF and the Havant Borough Local Plan (Core Strategy) (2011); and (Allocations) (2014).
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Impact Test

3.15 The impact test is to be undertaken in relation to developments of a certain scale where the sequential test is considered to have been passed. The purpose of the test is to ensure that the impact over time (up to 5 years) of certain out-of-centre and edge-of-centre proposals, on existing town centres is not significantly adverse.

3.16 The NPPF defines 'main town centre uses' as;

"Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)."

3.17 National Planning Practice Guidance in relation to 'Ensuring the vitality of town centres', confirms that the impact test will not apply to all main town centre uses. It relates only to retail, office and leisure development.

3.18 Notwithstanding this, the LPA indicated in its pre-application advice that the proposed use was a leisure use and as such, the impact test should also be satisfied, if the qualifying threshold was exceeded. Whilst not actually required for a hotel use (which is not defined as a leisure use in the NPPF/ NPPG), for the sake of robustness, the applicant has included an assessment of the impact of the proposed development on the defined town centres of Havant and Waterlooville.

3.19 The applicable floorspace threshold for an impact test, is developments with a gross floorspace exceeding 2,500m². The gross external floorspace of the proposed hotel development is 2,670m².

3.20 In summary, the supporting 'Sequential Test and Impact Assessment' submitted with this application identified existing hotels in Havant and Waterlooville, in town centre locations, edge-of-centre locations; and out-of-centre locations. This was advised in the 'Havant Hotel Fact File' prepared by 'Hotel Solutions' in 2015. It confirmed that

there is currently only one hotel within the defined town centre boundary of Havant and no hotels within the defined town centre of Waterloooville.

- 3.21 Furthermore, it is understood that currently, there are no plans / planning applications for further hotel uses in either the defined town centres.
- 3.22 Travelodge is not currently represented in the immediate Havant area, close to the main highway network. The selection of the town and site has been subject to separate in-depth assessment by Travelodge and they have concluded that there is demand in the locality for additional bed spaces.
- 3.23 The 'Havant Hotel Fact File' prepared by 'Hotel Solutions' in 2015 also concluded that corporate demand for hotel accommodation in Havant looked set to increase given the number of sites where new employment uses were planned. In particular, it identified that contractor demand for budget hotel accommodation looked set to increase over the next few years, given the planned level of construction activity.
- 3.24 Travelodge considers that Havant is a growing area that will continue to grow in importance as a commercial and residential location in the future.
- 3.25 There is no known committed or planned public or private investment in leisure or hotel development in Havant or Waterloooville town centres, that the proposed development could otherwise adversely impact upon. No such proposals have been advised by the Local Planning Authority as part of the pre-application process that it has engaged in prior to the submission of the planning application.
- 3.26 It is therefore considered that there is demand for a hotel of this scale in this location and the proposed development would not have an adverse impact on existing hotels, or existing committed or planned investment in the defined town centre areas.
- 3.27 As such the application proposal passes the impact test and accords with Policy CS5: Tourism, of the Havant Borough Local Plan (Core Strategy) (2011), which states that

planning permission will be granted for appropriate development proposals that provide hotel and other types of tourist accommodation.

- 3.28 Overall, the application satisfies both national and local policy requirements insofar as they relate to the principle of development.

Transport/ Highway Impacts

- 3.29 The pre-application advice provided by the LPA advised that the highway impacts on surrounding roads and ASDA roundabout and nearby junctions would need to be addressed and a Transport Assessment and Travel Plan submitted with any planning application.
- 3.30 As such, a detailed Transport Statement and Travel Plan has been prepared and submitted with the planning application (Curtins), to advise on traffic and transportation issues associated with the proposed development.
- 3.31 In summary, the Transport Assessment considers that it is reasonable to conclude that the proposed development scheme is consistent with local and national transport policy.
- 3.32 It has used appropriate methodology to predict the residual vehicular impacts associated with the proposed development and derive future year traffic flows in order to consider the number of additional trips that would be generated by the proposed hotel development.
- 3.33 It has also reviewed existing highway safety records to confirm that any existing highway safety issues on the local highway network will not be exacerbated by the development proposal.
- 3.34 The traffic generation exercise confirms that the proposed development could result in approximately 25 additional two-way trips during the busiest AM peak hour. This equates to approximately one additional arrival or departure every 2 minutes travelling on the local highway network. It is confirmed that the peak movements associated with a hotel development are departures in the AM peak period and arrivals in the PM peak period. This opposes that of the surrounding industrial and

business park typical network movements and therefore will not significantly add to the busiest arms of the local junctions.

- 3.35 The site itself is accessible by sustainable modes of transport, the surrounding area exhibits good levels of pedestrian and cycling infrastructure and there are a number of public transport opportunities within acceptable walking distance of the site.
- 3.36 The Transport Assessment is also supported by an Interim Travel Plan, which contains a site-specific package of measures to encourage the use of sustainable transport options and reduce car journeys made to the hotel by both staff and visitors.
- 3.37 This accords with both the requirements set out in the LPA's pre-application advice and with national and local transport policies by way of locating development in an accessible location. Overall, from a traffic and transportation perspective, it is demonstrated that the development proposal should receive support from the Highways Authority.

On-site constraints/ Impact on the character and appearance of the area

- 3.38 The pre-application advice provided by the LPA recognises that the application site is located within an area of mixed development types and styles associated with various retail, restaurant, industrial and other uses. It did not consider that there is a clear established design context for the development. It confirms that the nature of the site itself is relatively self-contained except from the east and part north, where the proposed development would be relatively prominent from the access road and the McDonalds/KFC car park.
- 3.39 It is further recognised that the levels changes and existing trees present design constraints and challenges. As such, it is confirmed that an application submission would need to be accompanied by a full Arboricultural Impact Assessment, Mitigation Statement and Tree Protection Plan to show how trees would be impacted by the development, together with measures for their protection. The pre-application advice further adds that the detailing and incorporation of attractive design features/articulation and use of good quality materials will be important in

ensuring an appropriately designed building. It is confirmed that an application would be assessed against policy CS16 of the Havant Borough Local Plan (Core Strategy) (2011).

- 3.40 Policy CS16: High Quality Design, states that planning permission will be granted for development that is designed to a high standard, which helps to create places where people want to live, work and relax. It then goes on to set out a number of objectives that all development should demonstrate in its design.
- 3.41 As required, a detailed Arboricultural Survey (Deltasimons) has been prepared and is submitted alongside the application. It identifies the individual tree species; considers those that present a risk to existing or proposed foundations; and recommends tree management and mitigation measures, where appropriate. In summary, it is considered that three trees along the northern boundary will be affected by works to reinstate the unstable retaining wall. It is proposed that an Arboricultural Method Statement will be submitted and agreed by the LPA before any works within the root protection area of those trees can be completed.
- 3.42 The Design and Access Statement that accompanies the application submission has set out a clear narrative of the proposed development in terms of its detailed design, context, layout, setting, scale and appearance. The revised proposal has taken the clear opportunity provided by the site to make a positive statement of high quality on what is otherwise a poor visual neighbour to other development in the area. It brings forward an inclusive design, achieved by an appreciation of context, as well as layout, scale, appearance, proportion and detail.
- 3.43 A contextual appraisal of the application site and its surrounding environs has informed the opportunity to improve the overall architectural and environmental quality. There is recognition of both the constraints and opportunities that the site presents to ensure that these can be appropriately accommodated for in the detailed design.
- 3.44 The Application proposal has had appropriate regard to the advice provided at the pre-application stage and where possible and reasonable to do so, has responded accordingly.

- 3.45 Both pedestrian and vehicular circulation will occur in a largely linear manner between the main entrance to the site and entrance to the hotel itself.
- 3.46 The entrance to the hotel and all the public areas, is located on the north-eastern corner of the building. The utility facilities have been primarily located on the southern portion of the building where the sloping ground will have to be retained to facilitate entrance and escape routes. The tall trees around the entire perimeter of the site will largely be retained, to hide and shield the site and proposed building from view.
- 3.47 The design of the building itself is very simple in terms of appearance. A rendered, minimalist volume of building will sit amongst the trees brightening up the site, by reflecting the light coming through in between the trees. Grey metal paneling detail between the window openings will help to break up the form and a band of red brick at ground level will connect the building to its surroundings, by reflecting the vernacular materiality of the wider surrounding area. The minimalist colour scheme will contrast with the dense green trees, while at the same time hiding behind them and resulting in a building that is predominantly sheltered from external views, by the trees.
- 3.48 Overall, the design of the proposed development clearly demonstrates an understanding of the open space features, topography, townscape and landscape character of the application site and its surrounding environment. The submitted Design and Access Statement sets out the design rationale for bringing forward an inclusive design, achieved by an appreciation of context, as well as layout, scale, appearance, proportion and detail. As such the application proposal accords with the provisions of Policy CS16 of the Havant Borough Local Plan (Core Strategy) (2011), and as such presents no barrier to the granting of planning permission.

Effect on Neighbours Residential Amenities

- 3.49 The pre-application advice provided by the LPA advised that an application would be considered in relation to any potential impacts on the residential amenities of the residential properties to the east of the site. The pre-application advice recognises that the physical separation of the application site to these properties will be helpful

in minimising any likely impacts. It is further recommended that a noise assessment be submitted, relating to all external plant such as air conditioning units.

- 3.50 As such, a detailed Noise and Vibration Assessment (Entran) has been prepared and submitted with the planning application, to advise whether existing noise and vibration levels at the site pose a constraint to the proposed residential uses.
- 3.51 In summary, the assessment indicates that mitigation measures for the hotel rooms in the form of standard double glazing will be required to meet the internal noise targets. Additional acoustically treated ventilation will be required so as not to compromise the sound reduction index of facades.
- 3.52 Furthermore, the measured daytime noise levels on the boundary of the site are within the range of acceptable levels for outdoor living areas.
- 3.53 It is also concluded that the noise impact of the additional vehicles from the hotel will be negligible at the nearest residential properties when compared to the existing traffic accessing ASDA, the fast food outlets and the Industrial Area.
- 3.54 As such, it is demonstrated that noise and vibration does not present a constraint to the granting of planning permission for the application proposal.

Employment

- 3.55 The pre-application advice provided by the LPA recognised that the application proposal would result in employment opportunities, which is considered to be a very positive aspect of the development. It further advised that the application submission should be accompanied by an employment statement that sets out the anticipated level of employment, Travelodge's employment policies and whether the development would result in local job opportunities.
- 3.56 It is confirmed that the proposed development is expected to employ in the order of 26 employees with 6 of these expected to be full time and 20 part time. Employees would be on a minimum of 8 contracted hours a week. Travelodge directly employs all of its staff and is a National Living Wage employer.

- 3.57 Travelodge will also work in partnership with JobCentre Plus and use the Universal Job Match platform to advertise hotel vacancies for both new positions before opening and also subsequent vacancies once the hotel is a going concern. It is also committed to actively working with the priorities of individual Councils and is able to engage with any specific employment programmes, if required.
- 3.58 Overall, those who join Travelodge are given training as a matter of routine, with the aim of achieving at least a level two national vocational qualification. Those who show promise can be fast-tracked to a management development scheme that can lead to promotion to assistant or hotel manager. Each new team member will have their own structured training plan based on their new role. Travelodge runs a multi-tiered management programme, known as Aspire. The aim is to progress from within and offer team members management progression routes through bespoke training schemes, coupled with sponsored Diplomas to fit the level of the role.
- 3.59 Given the above, it is demonstrated that Travelodge are committed to supporting the career progression opportunities of their staff and are also prepared to engage appropriately to make job opportunities available to the local community. As such, the employment of staff presents no barrier to the granting of planning permission.

Flood Risk/ Drainage

- 3.60 The pre-application advice provided by the LPA confirmed that, notwithstanding the application site is within Flood Zone 1, the submission of a flood risk assessment would be appropriate given the size and nature of the site. It further confirmed that the proposals should include full details of foul and surface water drainage and where appropriate, measures to secure the maintenance and management of any SUDS features proposed.
- 3.61 Given that the application site is in Flood Zone 1 and the site size is less than 1 hectare, a site-specific flood risk assessment is not required in association with the application proposal. However, a Drainage Strategy Statement (Curtins) has been prepared in support of the proposal and submitted with the application.

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- 3.62 The aim of the surface water drainage proposals is to focus on the capture and management of all surface water within the site boundary, to prevent any likelihood of flooding to the proposed development, adjacent sites and infrastructure.
- 3.63 In summary, the drainage strategy considers that soakaways are unfeasible, given the above ground conditions and the shallow groundwater that was encountered in most of the exploratory holes during the site investigation.
- 3.64 It is further considered that a direct connection into the nearest watercourse (approx. 400m to the north of the site) is also unviable, due to obstructions that lie between the site and the brook.
- 3.65 It is proposed to discharge surface water and foul water flows from the site to existing foul and surface water sewers, respectively. A pre-development enquiry to Southern Water has raised no objection to discharging surface water to their existing public water sewer at the rate of 5l/s.
- 3.66 The overall attenuation volume required, which takes account of the 100yr event, plus 30% for climate change, is 183m³. Furthermore, a sensitivity test of this proposed system has been undertaken for the 100yr event, plus 40% for climate change. This shows a minor increase in the discharge rate from site, but no flooding events.
- 3.67 Considering the site constraints, a sealed drainage system with an underground tank is proposed, which will connect to an existing surface water manhole to the north of the site. This strategy proposes to control the runoff to the above discharge rate via a Hydro-brake flow control chamber, downstream of the underground tank.
- 3.68 Insofar as water quality is concerned, the site is classified as presenting a low pollutant hazard level in vehicle areas. To ensure water quality improvement into the surface water sewer system, a combination of permeable paving/ sub-base and filter drains are to be proposed. This will treat runoff from car parking and hardstanding areas.
- 3.69 Insofar as flood risk is concerned, the risk of surface water flooding is very low with the exception of two small strips to the west of the site, which are considered to be
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at low risk. Surface water flooding is also highly dependent on ground levels, which will be redesigned as part of the development proposal and which will reduce the slightly increased risk.

3.70 Insofar as foul water is concerned, it is proposed to connect to the existing foul sewer, which is located to the north east of the site. A developer enquiry submitted to Southern Water has confirmed that the existing system has sufficient capacity to accommodate the foul water discharge from the site.

3.71 Overall and in accordance with the requirement set out in the pre-application advice, full details of foul and surface water drainage are set out and demonstrate that this can be appropriately dealt with. As such, matters of foul and surface water drainage present no barrier to the granting of planning permission.

Ecology

3.72 The pre-application advice provided by the LPA confirmed that a Phase 1 ecological survey of the site should be submitted and this should include an assessment of the potential for the site, to support protected species. It also confirmed that the location of the site is within 5.6km of the Chichester and Langstone Harbours Special Protection Area and as such, any forthcoming planning application will need to be in accordance with the Bird Aware Solent Definitive Strategy. It is also confirmed that the need for and quantum of any contribution in mitigation of any consequent visitor impact on the SPA would be assessed at the application stage, in relation to the location of the site and the likely users of the facility.

3.73 A Preliminary Ecological Appraisal (Deltasimons) has been prepared and is submitted in support of the application proposal. The primary aims of the PEA is to; identify habitat types; identify areas of potential for protected species within the site and immediately outside its boundaries; identify any invasive plant species; prepare a phase 1 habitat plan; and propose recommendations for further surveys, where appropriate.

3.74 In summary, the PEA confirms that the site comprises of formerly developed land, characterised by concrete hardstanding with colonising grassland and ruderal

species surrounded by broadleaved woodland. It notes that there are four internationally designated statutory sites within 6km of the site and that the site also falls within the Impact Risk Zone of the international designated sites, within which all planning applications must be assessed for likely impacts.

3.75 Given the anticipated impacts of the development, the PEA considered that largely, the potential presence of protected and notable species can be mitigated for through the implementation of appropriate precautionary working measures and timing of works. These are set out in the 'Recommendations' section of the report and largely comprise of measures for the protection of nesting birds and bats during construction and operational phases of the development.

3.76 Insofar as the potential presence of Hazel Dormice is concerned, follow-up surveys have been carried out in this regard to determine the presence/ likely absence of hazel dormice and the extent of dormice activity should it occur. To date, the follow-up surveys in this regard has presented no evidence of any species utilising the dormouse nest tubes. This is reported in the 'Hazel Dormouse Survey Scope of Works' report, submitted with the application.

3.77 Taken together it is considered that the recommendations will ensure full compliance with all UK and European legislation and current planning policy, as well as ensuring the safeguarding of natural habitats both within and adjacent to the application site. As such, there are no ecological matters that present a barrier to the granting of planning permission.

Contamination

3.78 The pre-application advice provided by the LPA advised that it would be necessary to investigate any ground contamination issues and to show how nay potential impacts on human health, the water environment or the wider environment would be addressed by the development.

3.79 As such, a Geo-Environmental Site Investigation (Deltasimons) has been carried out and the reported findings are submitted in support of this application. The aim of the investigation was to obtain information regarding ground conditions, from which

risks to end-users, the environment and structures can be assessed, with mitigation outlined, if necessary.

3.80 In summary, the recommendations of the assessment include; the incorporation of a layer of certified topsoil into landscaped areas; ground gas protection measures within the proposed building; implementation of a hotspot protocol during construction; and suitable dust suppression techniques during construction and demolition works.

3.81 Overall, there are no ground contamination issues associated with the proposed development that present a barrier to the granting of planning permission.

4. SUMMARY AND CONCLUSIONS

4.1 This application seeks planning permission for the construction of an 81-bed, four-storey hotel (use class C1), associated car-parking, landscaping and ancillary works.

4.2 In assessing the acceptability of the development proposal, the main issues are considered to be;

- i) The principle of development (including sequential test and impact test);
- ii) Transport/ highway impacts;
- iii) Impact on the character and appearance of the area;
- iv) On-site constraints;
- v) Effect on neighbours residential amenities;
- vi) Employment;
- vii) Flood Risk/ Drainage;
- viii) Ecology;
- ix) Contamination;
- x) Developer Contributions/ S106 requirements;
- xi) Public Engagement; and
- xii) Other matters.

4.3 In considering the principle of development, the application proposal passes the sequential test, as there are no sequentially preferable sites within the identified search area, for a main town centre use. On this basis, an in-principle, policy objection should not be maintained to the application proposal as it is demonstrated that the proposal accords with the policy provisions of the NPPF and the Havant Borough Local Plan (Core Strategy) (2011); and (Allocations) (2014).

4.4 Furthermore, whilst not strictly required in relation to a proposed hotel use, the application proposal passes the impact test and accords with Policy CS5: Tourism, of the Havant Borough Local Plan (Core Strategy) (2011), which states that planning permission will be granted for appropriate development proposals that provide hotel and other types of tourist accommodation.

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- 4.5 Overall, the application satisfies both national and local policy requirements insofar as they relate to the principle of development.
- 4.6 In considering Transport and Highways matters, a Detailed Transport Assessment and accompanying Interim Travel Plan have been prepared and submitted in support of the application proposal.
- 4.7 The conclusions accord with both the requirements set out in the LPA's pre-application advice and with national and local transport policies by way of locating development in an accessible location. Overall, from a traffic and transportation perspective, it is demonstrated that the development proposal should receive support from the Highways Authority.
- 4.8 The pre-application advice provided by the LPA recognises that the application site is located within an area of mixed development types and styles associated with various retail, restaurant, industrial and other uses. It did not consider that there is a clear established design context for the development. It confirms that the nature of the site itself is relatively self-contained except from the east and part north, where the proposed development would be relatively prominent from the access road and the McDonalds/KFC car park.
- 4.9 The Design and Access Statement that accompanies the application submission has set out a clear narrative of the proposed development in terms of its detailed design, context, layout, setting, scale and appearance. The revised proposal has taken the clear opportunity provided by the site to make a positive statement of high quality on what is otherwise a poor visual neighbour to other development in the area. It brings forward an inclusive design, achieved by an appreciation of context, as well as layout, scale, appearance, proportion and detail.
- 4.10 Overall, the design of the proposed development clearly demonstrates an understanding of the open space features, topography, townscape and landscape character of the application site and its surrounding environment. The submitted Design and Access Statement sets out the design rationale for bringing forward an inclusive design, achieved by an appreciation of context, as well as layout, scale,
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appearance, proportion and detail. As such the application proposal accords with the provisions of Policy CS16 of the Havant Borough Local Plan (Core Strategy) (2011), and as such presents no barrier to the granting of planning permission.

- 4.11 The pre-application advice provided by the LPA advised that an application would be considered in relation to any potential impacts on the residential amenities of the residential properties to the east of the site. The pre-application advice recognises that the physical separation of the application site to these properties will be helpful in minimising any likely impacts. It is further recommended that a noise assessment be submitted, relating to all external plant such as air conditioning units.
- 4.12 In summary, the assessment indicates that mitigation measures for the hotel rooms in the form of standard double glazing will be required to meet the internal noise targets. Additional acoustically treated ventilation will be required so as not to compromise the sound reduction index of facades.
- 4.13 Furthermore, the measured daytime noise levels on the boundary of the site are within the range of acceptable levels for outdoor living areas and it is also concluded that the noise impact of the additional vehicles from the hotel will be negligible at the nearest residential properties when compared to the existing traffic accessing ASDA, the fast food outlets and the Industrial Area. As such, it is demonstrated that noise and vibration does not present a constraint to the granting of planning permission for the application proposal.
- 4.14 The pre-application advice provided by the LPA recognised that the application proposal would result in employment opportunities, which is considered to be a very positive aspect of the development. It further advised that the application submission should be accompanied by an employment statement that sets out the anticipated level of employment, Travelodge's employment policies and whether the development would result in local job opportunities.
- 4.15 It is confirmed that the proposed development is expected to employ in the order of 26 employees with 6 of these expected to be full time and 20 part time. Travelodge will also work in partnership with JobCentre Plus and use the Universal Job Match platform to advertise hotel vacancies for both new positions before opening and

also subsequent vacancies once the hotel is a going concern. It is also committed to actively working with the priorities of individual Councils and is able to engage with any specific employment programmes, if required.

- 4.16 Given the above, it is demonstrated that Travelodge are committed to supporting the career progression opportunities of their staff and are also prepared to engage appropriately to make job opportunities available to the local community. As such, the employment of staff presents no barrier to the granting of planning permission.
- 4.17 The pre-application advice provided by the LPA confirmed that the proposals should include full details of foul and surface water drainage and where appropriate, measures to secure the maintenance and management of any SUDS features proposed.
- 4.18 Given that the application site is in Flood Zone 1 and the site size is less than 1 hectare, a site-specific flood risk assessment is not required in association with the application proposal. However, a Drainage Strategy Statement (Curtins) has been prepared in support of the proposal and submitted with the application.
- 4.19 It is proposed to discharge surface water and foul water flows from the site to existing foul and surface water sewers, respectively. A pre-development enquiry to Southern Water has raised no objection to discharging surface water to their existing public water sewer at the rate of 5l/s.
- 4.20 Insofar as foul water is concerned, it is proposed to connect to the existing foul sewer, which is located to the north east of the site. A developer enquiry submitted to Southern Water has confirmed that the existing system has sufficient capacity to accommodate the foul water discharge from the site.
- 4.21 Overall and in accordance with the requirement set out in the pre-application advice, full details of foul and surface water drainage are set out and demonstrate that this can be appropriately dealt with. As such, matters of foul and surface water drainage present no barrier to the granting of planning permission.

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- 4.22 The pre-application advice provided by the LPA confirmed that a Phase 1 ecological survey of the site should be submitted and this should include an assessment of the potential for the site, to support protected species.
- 4.23 A Preliminary Ecological Appraisal (Deltasimons) has been prepared and is submitted in support of the application proposal. In summary, the PEA confirms that the site comprises of formerly developed land, characterised by concrete hardstanding with colonising grassland and ruderal species surrounded by broadleaved woodland.
- 4.24 Given the anticipated impacts of the development, the PEA considered that largely, the potential presence of protected and notable species can be mitigated for through the implementation of appropriate precautionary working measures and timing of works. These are set out in the 'Recommendations' section of the report and largely comprise of measures for the protection of nesting birds and bats during construction and operational phases of the development.
- 4.25 Insofar as the potential presence of Hazel Dormice is concerned, follow-up surveys have been carried out in this regard to determine the presence/ likely absence of hazel dormice and the extent of dormice activity should it occur. To date, the follow-up surveys in this regard has presented no evidence of any species utilising the dormouse nest tubes.
- 4.26 Taken together it is considered that the recommendations will ensure full compliance with all UK and European legislation and current planning policy, as well as ensuring the safeguarding of natural habitats both within and adjacent to the application site. As such, there are no ecological matters that present a barrier to the granting of planning permission.
- 4.27 The pre-application advice provided by the LPA advised that it would be necessary to investigate any ground contamination issues and to show how nay potential impacts on human health, the water environment or the wider environment would be addressed by the development.
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- 4.28 As such, a Geo-Environmental Site Investigation (Deltasimons) has been carried out and the reported findings are submitted in support of this application. In summary, the recommendations of the assessment include; the incorporation of a layer of certified topsoil into landscaped areas; ground gas protection measures within the proposed building; implementation of a hotspot protocol during construction; and suitable dust suppression techniques during construction and demolition works.
- 4.29 Overall, there are no ground contamination issues associated with the proposed development that present a barrier to the granting of planning permission.
- 4.30 Detailed assessments of various site specific matters have been carried out and broadly concludes that the overall development proposal is compliant with adopted development plan policy.
- 4.31 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that any determination under the Planning Acts, should be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.32 At the heart of the NPPF (July 2018) remains the principle that the planning system is to contribute to the achievement of sustainable development. Insofar as decision-taking is concerned, this continues to mean;
- 1) approving development proposals that accord with an up-to-date development plan without delay; or
 - 2) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - i) the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
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- 4.33 A balanced assessment of all material considerations as they apply to the application proposal demonstrates that it broadly accords with adopted development plan policy and there are no fundamental and overriding reasons to withhold planning permission in this instance.
- 4.34 Furthermore, there should be no delay within the application process to unreasonably withhold a granting of planning permission.

APPENDICES

APPENDIX 1: Copy Pre-Application Request

Havant Borough Council
Planning Services
Public Service Plaza
Civic Centre Road
Havant
PO9 2AX

By On-line Pre-Application Enquiry

Our Ref: 1122.2.TGD.AJO.Fn

21st June 2018

F.A.O. Planning Services

Dear Sir/ Madam,

Re: Pre-Application Enquiry Ref.
Request for Pre-Application Advice by Tiger Developments
Land Adjacent to ASDA, Larchwood Avenue, Havant, PO9 3QW

Further to the submission of the above referenced pre-application enquiry we confirm that pre-application advice is sought for the proposal to construct an 80/81-bed Travelodge hotel on Land adjacent to ASDA at Larchwood Avenue, Havant.

To support this enquiry we have also enclosed the following drawings;

- i) Drawing No. 4231-108C – Proposed Ground Floor;
- ii) Drawing No. 4231-109B – Proposed First Floor;
- iii) Drawing No. 4231-110B – Proposed Second Floor;
- iv) Drawing No. 4231-111B – Proposed Third Floor; and
- v) Drawing No. 4231-112 – Proposed Front Elevation

The level of pre-application service requested is to include for internal and external consultee advice; confirmation of the relevant planning history for the site; confirmation of the relevant planning policies and development plan framework; confirmation of developer contributions and CIL requirements that may be applicable; and confirmation of planning application validation requirements.

The level of pre-application service requested is also to include for a site visit to be undertaken and for a meeting to take place with the allocated planning officer. Given the site area of 4,507m²/ 0.45ha, we have calculated the correct fee to pay for this service to be **£565**. Payment has been made under separate cover by card payment over the telephone.

We look forward to receiving confirmation that this pre-application request has been received and to arranging a convenient meeting date.

If you have any further queries in the meantime, please do not hesitate to contact me.

Yours faithfully

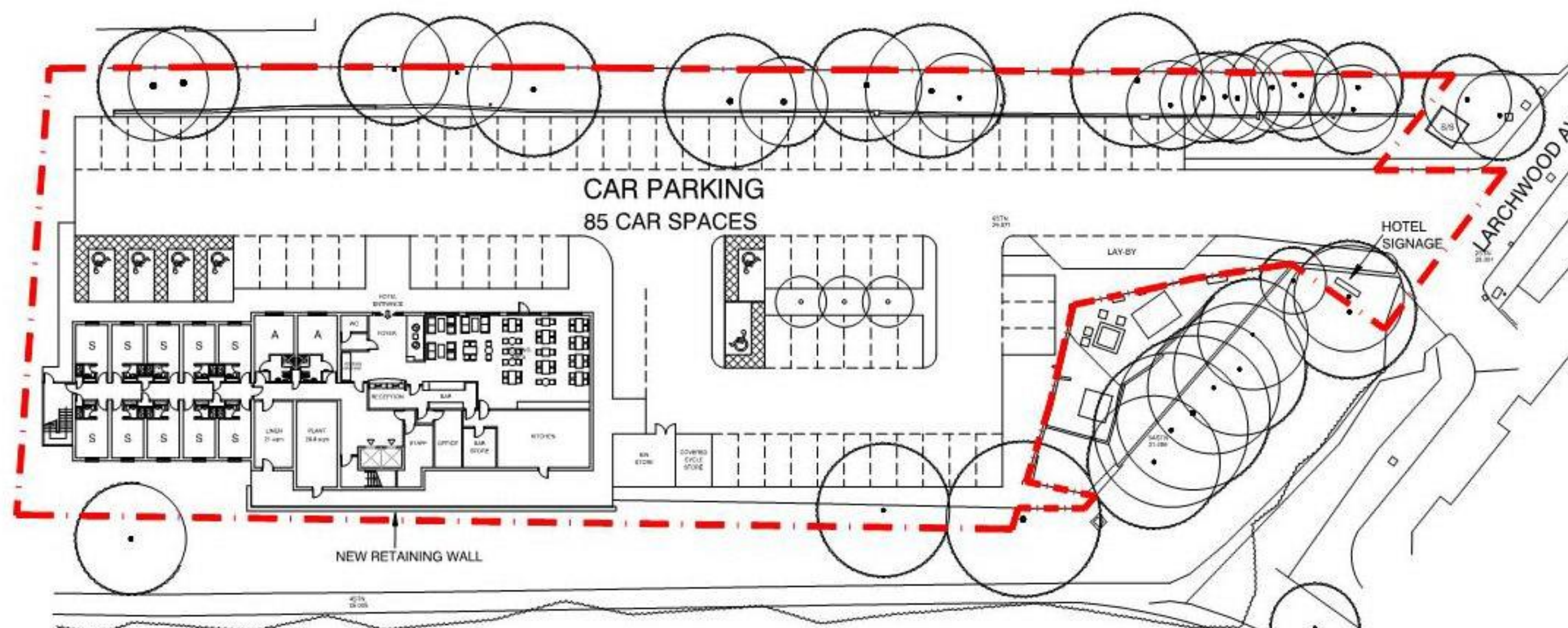
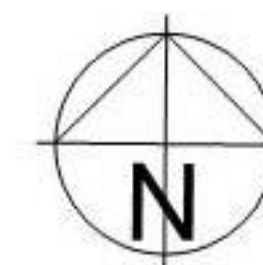


Amanda Olley MRTPI
Director

On behalf of Summit Planning Associates Ltd

Encls.

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C	GENERAL AMENDMENTS	14.06.18
B	HOTEL ROOM MIX REVISED	12.06.18
A	BOUNDARY REVISED	30.05.18
#	FIRST ISSUE	29.05.18

REV	NOTES	DATE
		DRAWN



Architects

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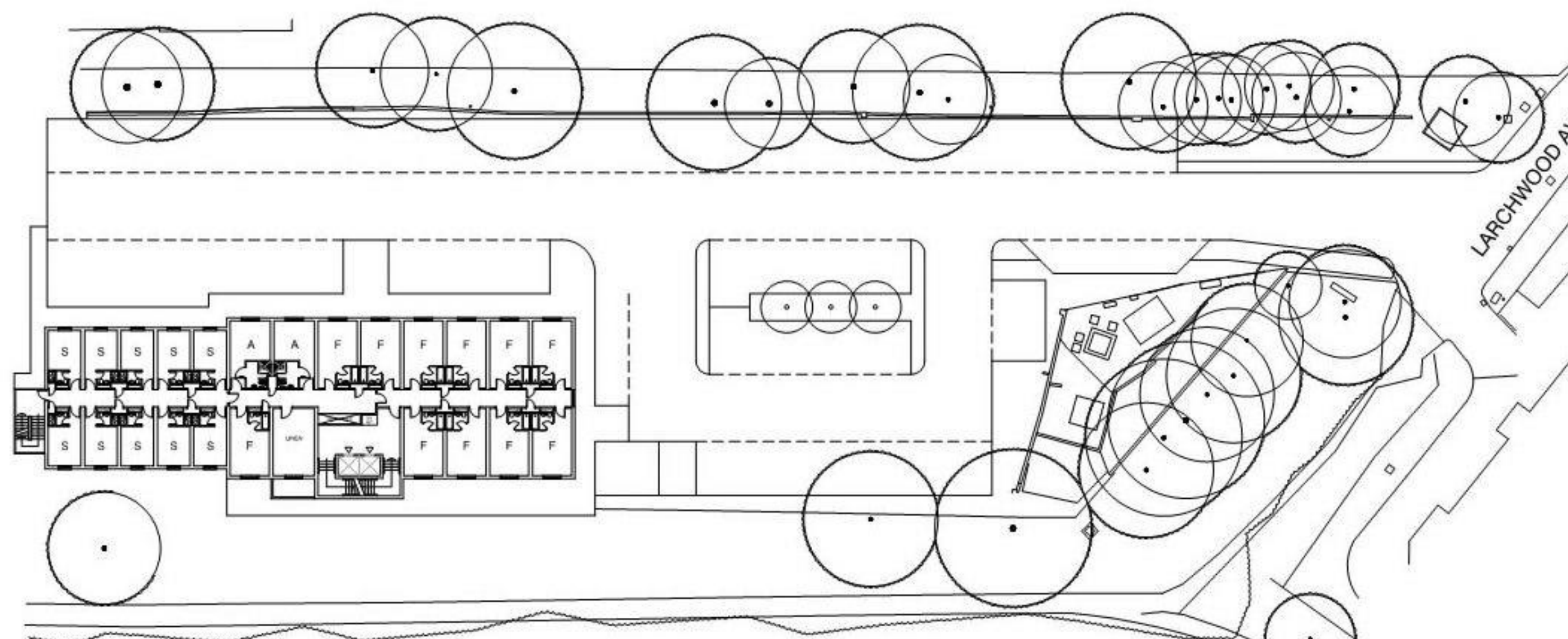
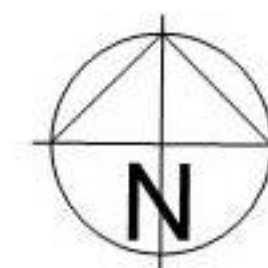
Proposed Ground Floor Plan

HOTEL ROOM MIX

GROUND	FIRST	SECOND	THIRD	TOTAL
10 S	10 S	10 S	10 S	40 S
	11 F	13 F	13 F	37 F
2 A	2 A			4 A
				81

PROJECT	HAVANT TRAVELODGE
DRAWING	PROPOSED GROUND FLOOR
SCALE	1:500 @ A3
CHECKED	
NUMBER	4231-108 Rev.C

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B	GENERAL AMENDMENTS	14.06.18
A	HOTEL ROOM MIX REVISED	12.06.18
#	FIRST ISSUE	29.05.18
REV	NOTES	DATE
		DRAWN



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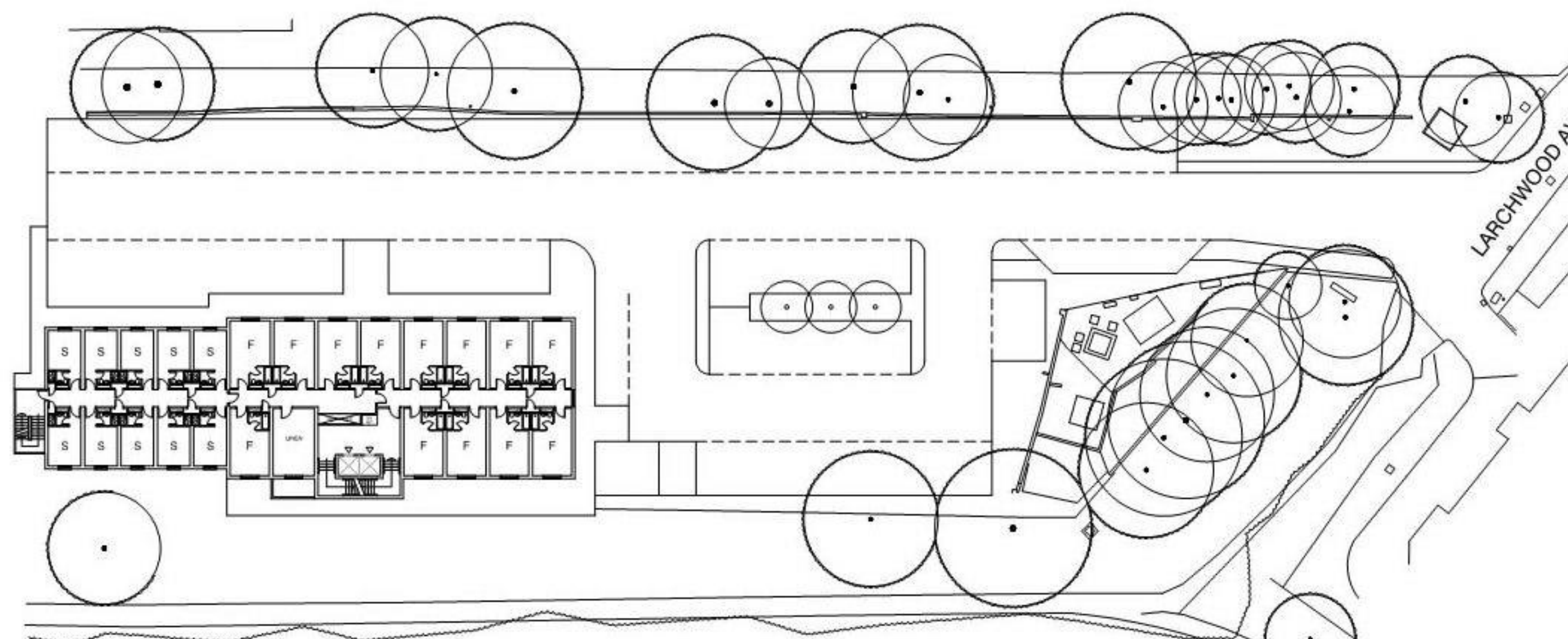
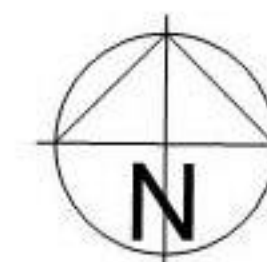
Proposed First Floor Plan

HOTEL ROOM MIX

GROUND	FIRST	SECOND	THIRD	TOTAL
10 S	10 S	10 S	10 S	40 S
	11 F	13 F	13 F	37 F
2 A	2 A			4 A
				81

PROJECT	HAVANT TRAVELODGE
DRAWING	PROPOSED FIRST FLOOR
SCALE	1:500 @ A3
CHECKED	
NUMBER	4231-109 Rev.B

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B	GENERAL AMENDMENTS	14.05.18 MN
A	HOTEL ROOM MIX REVISED	12.06.18 MN
#	FIRST ISSUE	29.05.18 MN
REV	NOTES	DATE DRAWN



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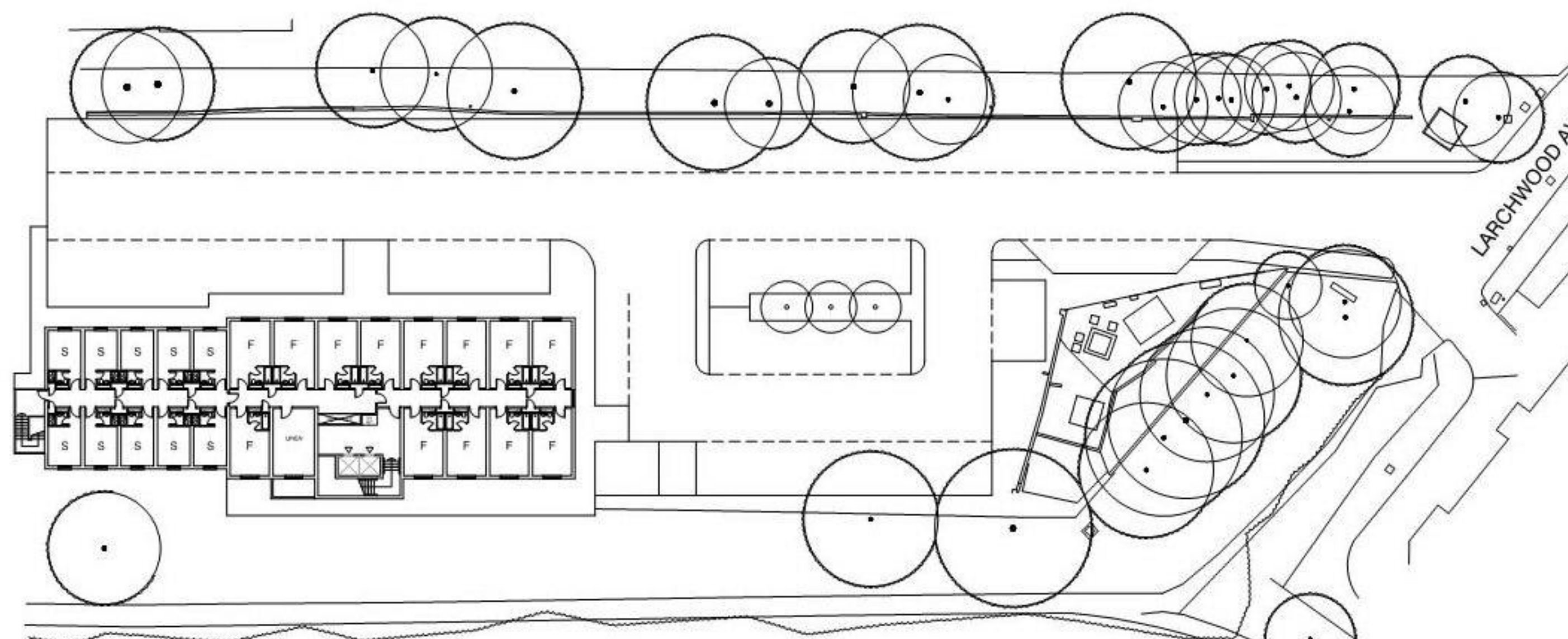
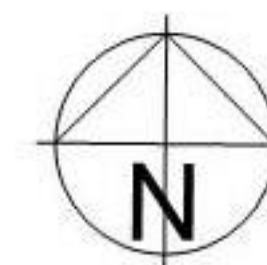
Proposed Second Floor Plan

HOTEL ROOM MIX

GROUND	FIRST	SECOND	THIRD	TOTAL
10 S	10 S	10 S	10 S	40 S
	11 F	13 F	13 F	37 F
2 A	2 A			4 A
				81

PROJECT	HAVANT TRAVELODGE
DRAWING	PROPOSED SECOND FLOOR
SCALE	1:500 @ A3
CHECKED	
NUMBER	4231-110 Rev.B

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B	GENERAL AMENDMENTS	14.06.18 MN
A	ROOM ADDED TO TOP FLOOR	12.06.18 MN
#	FIRST ISSUE	29.05.18 MN
REV	NOTES	DATE DRAWN



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Proposed Third Floor Plan

HOTEL ROOM MIX

GROUND	FIRST	SECOND	THIRD	TOTAL
10 S	10 S	10 S	10 S	40 S
	11 F	13 F	13 F	37 F
2 A	2 A			4 A
				81

PROJECT	HAVANT TRAVELODGE
DRAWING	PROPOSED THIRD FLOOR
SCALE	1:500 @ A3
CHECKED	
NUMBER	4231-111 Rev.B

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Proposed Front Elevation

#	FIRST ISSUE	14.06.18 MN
REV	NOTES	DATE DRAWN



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PROJECT	HAVANT TRAVELODGE
DRAWING	PROPOSED FRONT ELEVATION
SCALE	1:200 @ A3
CHECKED	
NUMBER	4231-112

APPENDIX 2: Copy Pre-Application Advice



Ms A Olley
Summit Planning Associates
The Studio
1 St Ann Street
Manchester
M2 7LG

Our Ref: GEN/18/00633
Direct Line: (023) 9244 6549
Ask For: Mr D Eaves
Email: planning.development@havant.gov.uk

14 September 2018

Site Location: Land at Asda, Larchwood Avenue, Havant
Re: Proposed development of 80/ 81 bed Travelodge hotel

Dear Ms Olley

I am writing to you further to your enquiry received on the 21 June 2018 and to our meeting of the 18th July regarding the above address and apologise for the delay in responding.

Having assessed the pre-application proposals I consider the main issues in the consideration and determination of any planning application at this stage to be as follows:

1. The principle of the development
2. Transport/highway impacts
3. Impact on the character and appearance of the area
4. On site constraints
5. Effect on neighbours residential amenities
6. Employment
7. Flood Risk/Drainage
8. Ecology
9. Contamination
10. Developer Contributions
11. Public Engagement
12. Other matters

1. The principle of the development

In terms of policy background the site is located in the Urban Area as defined by policies CS17 and AL2 of the Local Plan. The site is also considered to represent a brown field site.

Within such areas there is a presumption in favour of sustainable development. The Hotel use proposed however fits within the definition of a main Town Centre use as defined by the National Planning Policy Framework (NPPF).

The Havant Borough Local Plan Policy Map identifies town centre boundaries at Havant and Waterlooville, the site is not allocated as a town centre under policies CS4 of the Havant Borough Local Plan (Core Strategy) 2011 (HBLP2011) and AL3 of the Havant Borough Allocations Plan 2014 (HBAP2014). The sites location is considered to be out of centre as defined by HBLP2011 and the NPPF.

Although 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 need for a sequential test is reinforced by paragraphs 3.39 and 2.12 of Policies CS4 and AL3. In the absence of an assessment to demonstrate there are no other sequentially preferable sites, a policy objection would therefore arise.

Part 7 of the NPPF 'Ensuring the vitality of town centres' sets out the tests to be applied to developments for town centre uses located away from the such centres. There is a need for Local Authorities to adopt a town centre first approach to such uses.

The NPPF sets out two key tests that should be applied when planning for town centre uses outside centres which are not in accordance with an up to date Local Plan; the sequential test and the impact test. These are relevant in determining individual planning applications. In this case the Council have an up to date Local Plan and the proposals would depart from the plan and therefore the tests need to be assessed to determine their relevance to the current proposals.

Sequential Test:

The sequential test is necessary to identify whether there are preferable sites for a development incorporating town centre uses within the centre.

The sequential test guides main town centre uses towards town centre locations first, then, if no town centre locations are available, to edge of centre locations, with preference for accessible sites which are well connected to the town centre. It supports the viability and vitality of town centres by placing existing town centres foremost in both plan making and decision taking. Only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.

The sequential test would be applicable to the proposed use. The NPPF sets out how the sequential test should be used in decision-taking. When considering edge of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.

It is for the applicant to demonstrate compliance with the sequential test. In the case of Havant Borough, given the sites location between the two main towns the test should consider alternative sites within and on the edge of Havant and Waterlooville town centres.

A checklist of the considerations that the Planning Authority should consider in determining whether the sequential test is met is provided in the Guidance Ensuring the vitality of town centres which states:

- with due regard to the requirement to demonstrate flexibility, has the suitability of more central sites to accommodate the proposal been considered? Where the proposal would be located in an edge of centre or out of centre location, preference should be given to accessible sites that are well connected to the town centre. Any associated reasoning should be set out clearly.

- is there scope for flexibility in the format and/or scale of the proposal? It is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.
- if there are no suitable sequentially preferable locations, the sequential test is passed.

Where an application fails to satisfy the sequential test, paragraph 90 of the NPPF confirms that it should be refused.

If the proposed development has very specific locational requirements robust justification for the requirements and how they relate to the development site and town centres would need to be put forward with the planning application.

The assessment should assess both town centre and edge of centre sites together with mixed use allocations and current unimplemented consents. In addition to your general search the following site examples are provided to assist your assessment:

1. Allocation in Local Plan - Dunsbury Hill Farm (This site is located close to the pre-application site and I would suggest that options in relation to this site are discussed with Portsmouth City Council who are the applicants for the development).
2. *Havant Town Centre (KS1 in Draft Local Plan)*
3. *Waterlooville Town Centre (KS2 in Draft Local Plan):*
4. *Edge of Centre - Langstone Technology Park*
5. *Edge of Centre - Land at BAE Systems Technology Park*

Impact Test

The Impact Test should be undertaken in relation to developments of a certain scale where the sequential test is considered to have been passed. The use is leisure related and in relation to such developments the applicable floorspace threshold for an impact test would be developments with a gross floorspace of 2500 square metres.

In this case the total floorspace would at this stage appear to exceed this threshold as discussed at our meeting although the final quantum of development was not fixed at that time. If the total floorspace does not exceed 2500 square metres it can be confirmed that the impact test will not be required.

Paragraph 89 of the NPPF set out the requirements of the impact test which should include:

- a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
- b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).

Paragraph 90 confirms that where an application is likely to have significant adverse impact on one or more of the considerations in paragraph 89, it should be refused.

Further guidance in relation to the impact and sequential test requirements can be found via the following link:

<https://www.gov.uk/guidance/ensuring-the-vitality-of-town-centres>

Dunsbury Hill Farm Allocation Site

Dunsbury Hill Farm is allocated in the HBLP2011 under policy CS18 as a strategic employment site and includes the allocation of a hotel. This site is located a short distance to the north of the proposed site. Development is underway on the site and the first unit (Fat Face) has been occupied.

The delivery of a business park and hotel are considered critical to the economic development of the Borough. There is a potential concern that the development of a hotel at the Larchwood Avenue site in close proximity to the allocated site could prejudice the development of the hotel on the allocation site. At this stage it is our initial view that the proposal is therefore contrary policies CS18 on strategic sites and DM6 on the coordination of development.

Any application would need to fully explore the impact of the hotel development proposed on the Dunsbury Hill Farm Allocation site. The original planning permission in relation to the allocated site can be viewed on the Council's website via the following link:

https://planningpublicaccess.havant.gov.uk/online-applications/applicationDetails.do?keyVal=DCAPR_227407&activeTab=summary

2. Transport/highway impacts

The highway impacts on surrounding roads and ASDA roundabout and nearby junctions would need to be addressed and a Transport Assessment and Travel Plan submitted with any planning application.

The proposal would also need to provide tracking drawings for waste and emergency vehicles to the site.

Car and Cycle parking requirements are set out in Parking Standards

<http://www.havant.gov.uk/planning-and-environment/planning-policy/supplementary-planning-documents/parking-supplementary>

All parking should meet HBC standard for appropriate parking space size.

Pedestrian routes linking the site to ASDA and Leigh Park should be explored as part of the Travel Plan.

The Development Engineer has provided a consultation response as follows:

I assume that this hotel is going to use the ASDA Roundabout which should have spare capacity but it needs to be checked. However none of the interior roads are adopted and there have been problems at Xmas, Easter, Bank Holidays when traffic find it is difficult to emerge onto the roundabout. The answer could be to install traffic lights on this private road and link them to the Highway Authority's Traffic lights but this is a matter for HCC the highway authority) and the owner of the internal road system to discuss.

These issues should be addressed within the Transport Assessment and it would be advisable to engage with Hampshire County Council in relation to this matter (they operate a charged pre-application service).

The access road to the site is understood to be private, any planning application will require the access road to be included within the red line up to the public highway. Notice of the application will need to be served on any owners and the appropriate ownership certificate submitted in relation to the planning application.

3. Impact on the character and appearance of the area

The site is located within an area of mixed development types and styles associated with various retail, restaurant, industrial and other uses. It is not considered that there is a clear established design context for the development.

The nature of the site itself is relatively self contained except from the east and part north north where the hotel would be relatively prominent from the access road and the McDonalds / KFC car park.

The levels changes and existing trees present design constraints and challenges. The pre-application does not provide full elevations at this stage. The detailing and incorporation of attractive design features / articulation and use of good quality materials will be important in ensuring an appropriately designed building. Any application would be assessed against HBLP 2011 policy CS16 and the Havant Borough Design Guide SPD 2011.

<https://www.havant.gov.uk/sites/default/files/documents/SPD%20Borough%20Design%20Guide.pdf>

In order to properly assess the impact of the proposed building in its wider context any planning application would need to be accompanied by street scenes/elevations, views from the north and east including levels information and existing Landscaping.

It is important that the design of the development carefully addresses the impact of level changes and trees on the usability of the building in terms of public areas and fenestration requirements.

The proposals should include a full landscape assessment and proposals for additional landscaping enhancements. The comments of the Councils Landscape Consultant are highlighted for your attention and to guide the proposals.

4. On site constraints

In terms of on site constraints, the changes in levels do present challenges both in terms of the design of building and its relationships with adjoining buildings and land uses.

The development site includes a number of important trees, particularly around the edge of the site. Any planning application would need to be accompanied by a full Arboricultural Impact Assessment, Arboricultural Mitigation Statement and Tree Protection Plan to show how trees would be impacted by the development together with measures for their protection.

There appears to be an existing pedestrian route running to the east of the site to the ASDA store. The development proposals would potentially offer an opportunity to retain and improve this route adding to connectivity to existing and proposed facilities.

5. Effect on neighbours residential amenities

In terms of the impact on the wider area, there are residential properties to the east of the site. The application would be considered in relation to any potential impacts on the residential amenities of these residents, for example from noise, disturbance, fumes and

vehicular movements (including servicing). It is considered that the physical separation to these properties is helpful with regard to minimising likely impacts.

The councils Environmental Health team have recommended the submission of a noise assessment relating to all external plant such as air conditioning units.

6. Employment

The proposals would result in employment opportunities and this is a very positive aspect of the development. The application should be accompanied by an employment statement which sets out the anticipated level of employment associated with the development, Travel Lodge's employment policies and in particular whether the development would result in local job opportunities. As mentioned at our meeting Leigh Park has significant issues in terms of lack of employment opportunities and social deprivation.

This development could help to provide suitable employment opportunities for local people.

7. Flood Risk/Drainage

The area is located within Flood Zone 1, however given the size and nature of the site it is considered that the submission of a flood risk assessment would be appropriate. The proposals should include full details of foul and surface water drainage and where appropriate measures to secure the maintenance and management of any SUDS features proposed.

Southern Water provide further guidance through their consultation response.

The site lies within a Source Protection Zone 1c for the Havant and Bedhampton Springs an essential Public Water Supply Source. Portsmouth Water have confirmed that the Flood Risk Assessment and Surface Water Management Strategy should clearly identify the means of foul and surface water drainage design and the applicant should be aware that Portsmouth Water would have a presumption against piling and deep bore soakaways at this site.

Both the Environment Agency and Hampshire County Council as Local Lead Flood Authority provide a paid pre-application service if you require further advice at this stage.

8. Ecology

The County Ecologist has provided the following advice in relation to the proposal (summary):

Whilst the site is not likely to be of particularly high ecological value, it may support species or habitats of ecological importance. For example, there are records of hazel dormice from the immediate surrounding landscape.

I would recommend that the applicant commissions a Phase 1 ecological survey of the site: this should include an assessment of the potential for the site to support protected species.

A Phase 1 ecological survey will determine whether there is any evidence of protected species or whether the site offers habitat suitable for supporting protected species, and whether the proposed works are likely to result in impacts to those habitats or species. Unless the consultant is able to conclude that there is no reasonable likelihood of protected species being present (due to negligible potential) or, that if present they are not to be impacted by the works, it is likely that further ecological survey work (Phase 2 survey) will be required prior to determination of the application. The results of any further surveys

should be used to provide an assessment of the likely ecological impacts of the proposed works and to inform any mitigation measures.

NPPF, Circular 06/2005 and Natural England Standing Advice on Protected Species, require that planning decisions are based on full, up-to-date ecological information and it is essential that all necessary survey, assessment and mitigation information is available to the LPA prior to determination, particularly in the case of protected species, which are a material planning consideration. This will enable the LPA to determine the application on the basis of full knowledge about the ecological impacts of the proposal and to ensure that any impacts can and will be mitigated, and are acceptable.

Natural England confirm that *The location of the site is within 5.6km of the Chichester and Langstone Harbours Special Protection Area (SPA). Any forthcoming planning application will need to be in accordance with the Bird Aware Solent Definitive Strategy.*

With regards to Hotel development the following paragraphs of the Definitive Solent Recreation Mitigation Strategy SRMS apply:

6.9. *The need for mitigation for the recreational impact of other types of residential accommodation will be assessed on a case-by-case basis by the local planning authority. The key 'test' is based around the likelihood of the proposed development generating additional recreational visits to the SPA(s). For example, in respect of residential accommodation designed specifically for elderly people, a developer contribution (or bespoke mitigation) will be required for apartments for the active elderly, but not for secure accommodation such as a residential nursing home for people who are unable to independently leave that accommodation and which does not provide residents parking or allow pets (this would also apply to people living with conditions that limit their mobility). However, mitigation may be required for any staff living on-site. Retirement properties designed for independent living with parking provision and which allow pets will be treated the same as C3 residential properties.*

6.10. *New hotels and other holiday/tourist accommodation - defined as both wholly new establishments and extensions of existing ones - is a residential-related use with the potential to generate additional recreational visits to the SPA(s). The need for mitigation for new hotel accommodation will be assessed on a case-by-case basis by the local planning authority in relation to the 'tests' set out in the paragraph above. Mitigation is unlikely to be required for new hotel accommodation in a city centre for example, if the guests will predominantly be business people or those visiting the built heritage rather than the coast. On the other hand, mitigation is more likely to be required for new hotel accommodation close to a SPA where guests will probably spend some time walking or pursuing other recreational activities at the coast.*

6.11. *Where mitigation is deemed to be necessary for new hotel and other holiday/tourist accommodation, the mitigation may take the form of a developer contribution calculated on the basis of the number of new bedrooms and the monetary contributions (or a proportion thereof) in paragraph 6.1 above. Such contributions will be pooled and spent on mitigation measures in the same way as developer contributions from new dwellings.*

In this case, the need for and quantum for any contribution would be assessed at the application stage in relation to the location of the site and the likely users of the facility and their potential for trips to the coast and consequent visitor impact on the SPA.

The strategy and further information can be found at the following addresses:

<http://www.birdaware.org/CHttpHandler.ashx?id=29372&p=0>

<http://www.havant.gov.uk/planning-and-environment/planning-policy/community-infrastructur>

A Biodiversity Mitigation and Enhancement Plan will need to be secured in relation to the development.

9. Contamination

Given the brownfield nature of the site it would be necessary to investigate any ground contamination issues and to show how any potential impacts on human health, the water environment or the wider environment would be addressed by the development.

10. Developer Contributions/S106 requirements

Whilst the Council have adopted a Community Infrastructure Levy within the Borough the development proposed is not included in the type of development where CIL is charged. The initial assessment of requirements in association with the S106 Agreement are as follows:

1. Highway works
2. Possible SRMP contribution (see above)
3. Highway improvements / sustainable transport links
4. Monitoring fee

11. Public Engagement

Any application submitted should include a Statement of Community Engagement setting out any public consultation carried out in relation to the development and how the form of the development has responded to any issues raised during this process.

The Council would encourage public consultation by the development team at the pre-application stage. This can take a number of forms but public exhibitions following a letter drop to local residents has been used by a number of developers in the Borough.

12. Other Matters:

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.

Sustainable Construction and High-Quality Design:

If the development is over 500 sq. m, then on completion it must at least meet the "very good" standard of BREEAM (criterion 3 of Policy CS14). 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"

Conclusion

In conclusion as you will appreciate the development proposed raises in principle issues which would need to be satisfactorily addressed through the sequential test and impact tests. There are also issues in relation to the impact of the development on the Dunsbury Hill Farm strategic site. At this stage you will appreciate that it is not therefore possible to conclude that the development is acceptable in principle.

If these matters can be satisfactorily addressed any planning application would also need to provide a suitable response to the other issues identified above.

I will forward by separate email copies of consultation responses received for your further information.

I trust that the above comments provide helpful guidance in relation to the submission of any future planning application.

Please note that the above comments are the opinion of an individual Planning Officer and are in no way binding upon the Council when determining an application for planning permission and nor will they prejudice the outcome of any application submitted.

This advice also only relates to planning matters, and does not relate to any other application that may be required under the Building Regulations or under any other Act, Regulation, Byelaw or Order where the Council's approval may be needed. For further guidance as to the need for consent under the Building Regulations please phone 023 9244 6571.

Yours sincerely

A black rectangular box redacting the signature of the Principal Planner.

Mr D Eaves
Principal Planner
Our Ref: GEN/18/00633



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