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**PREMIER INN, “BURBERRY HOUSE and “SPINNEY”
ROUNDSTONE LANE / ROUNDSTONE ROAD
EAST PRESTON
LITTLEHAMPTON
BN16 1EB**

**PLANNING APPLICATION BY
PREMIER INN HOTELS LIMITED**

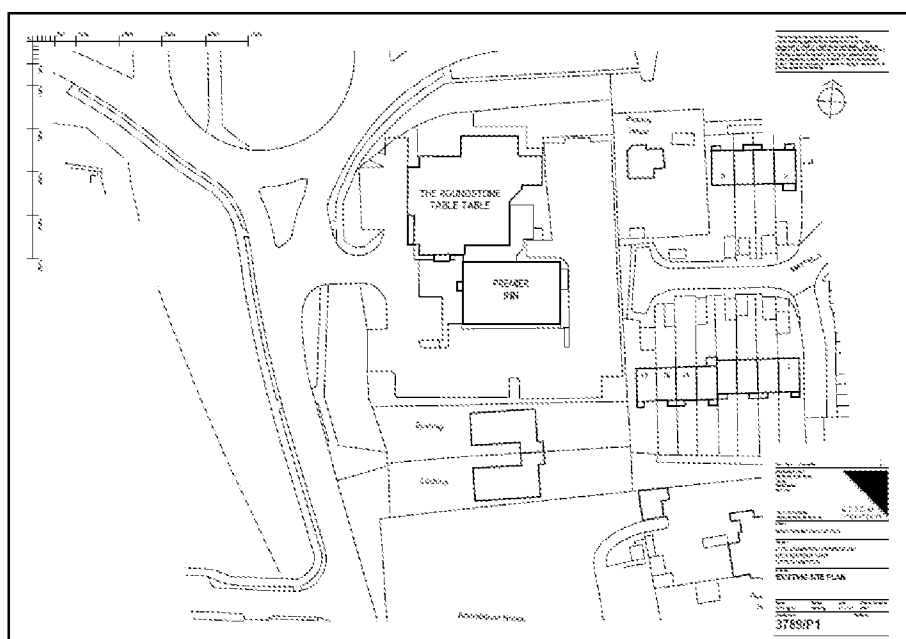
PLANNING STATEMENT

PP-04139126

JULY 2015

1.0 THE SITE

- 1.1 The site is located on the junction of Roundstone Road and Roundstone Lane, the former being the A259 Littlehampton to Worthing road and the latter the B2140. The junction takes the form of a roundabout. On the main road there is a deep verge, previously reserved for road-widening that has not taken place. The site has no vehicular access from Roundstone Road, although the private house to the east, Burberry House, has such an access. The site access is taken from the minor road, south of the roundabout.
- 1.2 The Premier Inn site comprises The Roundstone restaurant, a one- and two-storey building occupying an area of 621 sq m, and the Premier Inn itself, a two-storey block with a gross internal floor area of 615 sq m, containing twenty guest rooms. The hotel accommodation is provided on a room-only basis, with the option to take meals in the associated restaurant. The car park extends around three sides of the building, with the external drinking/dining area on the north side. There are 73 parking spaces, including four universal access spaces.
- 1.3 The site is located about half a mile from Angmering train station and bus services run along both of the adjacent roads.
- 1.4 The application site extends beyond the 0.42 hectare site of the hotel and restaurant and would include two adjoining residential properties, Spinney to the south and Burberry House to the east. These plots increase the application site to 0.53 hectares.
- 1.5 None of the buildings on the site are listed; nor is the site within a conservation area. The site is not within an area that is liable to flood; there are no protected trees on the Roundstone Lane frontage of the Premier Inn and Spinney..
- 1.6 The Roundhouse is a long-established pub and restaurant to which the Premier Inn was added in 2007, following planning permission A/202/06.



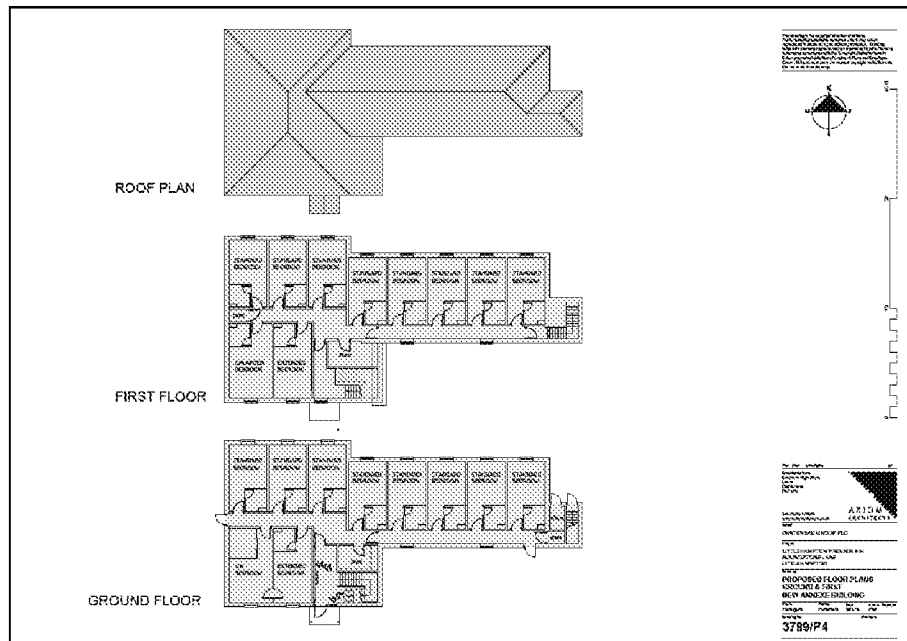
2.0 THE PROPOSAL

- 2.1 Throughout the country Premier Inn is embarking on a major development programme (See Section 5). Having identified scope for growth in Sussex, the company has viewed Littlehampton as a site with the potential to provide that growth. This has been made possible through the availability of the two adjacent plots that form part of the application site.
- 2.2 The proposal therefore includes the acquisition and demolition of two properties, Burberry House and Spinney, and the construction, partly on the site of the former, of a two-storey hotel annexe providing twenty new guest rooms. The site of Spinney would be used to extend the on-site car parking. As a consequence of the proposed development the site would comprise forty hotel rooms, two of them UA rooms, a restaurant of 170 covers/44 tables and a car park of 86 spaces, including six universal access spaces.
- 2.3 The annexe would be of an irregular shape, so as to accommodate parking, the protection of a tree outside the site and visibility from the front of the adjacent building to the east. It would contain ten rooms on each floor, eight on the north side and two on the south. Three rooms would be enlarged, family rooms and there would be one further UA room. The gross internal floor area of the annexe would be 630 sq m. Space around the annexe and the extended car park will be landscaped.
- 2.4 The application comprises:-
- Application form and Certificate B,
 - Planning Statement,
 - Transport Statement,
 - Ecological Report,
 - Tree Survey and Statement
 - Energy statements
 - Landscape Scheme 561-01
 - Application drawings:
 - Location plan,
 - 3789/P1 Existing site plan,

- 3789/P2d proposed site plan,
- 3789/P3 existing floor plans,
- 3789/P4 proposed floor and roof plans,
- 3789/P7 proposed elevations

Pre-app and Post-app

- 2.5 The submission follows pre-application discussions undertaken in 2014 (PAA/113/14) with David Sullivan, although the scheme was subsequently changed prior to submission. Pre-app drawing 1685/488/P2B involved the acquisition of the two plots which are now included in the application site, but utilised both plots for car parking with the development taking the form of an extension to the Premier Inn rather than an annexe. The various layout options are considered in Section 6, Design and Access.
- 2.6 The principle of the development was accepted, given the site's location in the built-up area. It was accepted that no S106 requirements or CIL payments would arise from the proposal. There was no indication that a sequential test would be required. The scheme which involved the creation of an access alongside the retained property, Lachine, was deemed unacceptable, as was the extent of the parking on the Burberry House site, so those elements of the proposal were amended.
- 2.7 An application was made following the agreement in principle (PL/50/15/A), but it raised a number of different issues, primarily related to the position of the annexe, vis-à-vis the potentially widened road and the house adjacent to Burberry House. Questions were also raised in respect of tree protection and landscaping. On the advice of the case officer, Anita Gardner, that application was withdrawn and further amendments were submitted for comment. These changes to the building's position were informally accepted, albeit that it affected to final level of on site car parking, and, with further advice regarding landscaping on the Roundstone Lane frontage, this resubmitted application represents the outcome of those positive discussions, for which the applicants are grateful.



3.0 NATIONAL PLANNING POLICY

NATIONAL PLANNING POLICY FRAMEWORK – HOTELS AND TOURISM

- 3.1 The National Planning Policy Framework (NPPF) was published in March 2012 with the aim of making the planning system less complex and more accessible. It is supplemented by the (ever evolving) Planning Practice Guidance (NPPG), first published in March 2014. These notes replace the much more detailed policy and guidance contained in the suite of Planning Policy Statement documents and elsewhere.
- 3.2 According to Paragraph 14... *At the heart of the National Planning Policy Framework is a **presumption in favour of sustainable development**...* (emphasis taken from the NPPF). Extending the existing Premier Inn is a highly sustainable way of increasing hotel provision in the area. It will allow economies of scale, for example, more efficient use of the associated pub/restaurant, which will not need to be expanded to accommodate the extra customers. By contrast a new hotel would require completely new kitchen and dining facilities.
- 3.3 Fundamental to the aims of the NPPF is the building of a strong, competitive economy. In order to do this, paragraphs 18 – 22 require that the local planning system should:
- Do everything it can to support sustainable economic growth;
 - Plan proactively to meet the development needs of business;
 - Avoid over-burdening investment in business through planning policy expectations;
 - Identify sites for local investment to match anticipated needs; and,
 - Support expanding business sectors and respond quickly to changes in economic circumstances;
- 3.4 With specific regard to hotels, Annex 2 of the NPPF classifies them as a ...*main town centre use*... under the subset of ...*tourism development*...

- 3.5 Paragraph 23 of the NPPF states that local planning authorities are to allocate a range of suitable sites for uses, including tourism, and to identify an appropriate range of sites to accommodate the identified need. The onus of site identification under the NPPF lies with the local planning authorities, through the LDF process, in which an identified need for such uses has been established.
- 3.6 In the context of the current application, the proposal relates to a use identified as economic development, namely a hotel, and to a site that is within an urban area but not in the town centre. No town centre sites are specifically allocated only for budget hotel use in Littlehampton and, while the policies promote growth in the tourism industry, the plans do not direct hotel developments only to specific sites in central locations. The local planning authority has identified no sequentially preferable sites for non-major hotel accommodation, though it would be unreasonable to do so in respect of a relatively small scheme and even less so when the proposal is itself an addition to an established facility. The Premier Inn site has an established history of Use Class C1 use, insofar as planning permission was granted for the construction of the Premier Inn hotel many years ago and there has been no other use since then. In this case, the site meets the requirement that it should not be in conflict with the Development Plan policies, considered in section 4 of this report. A site which has a longstanding use, established through a planning permission, cannot be considered as a non-conforming use. At no time has it been re-allocated for an alternative use and cannot retrospectively be considered as such, simply by reason of a fluctuation in national policy guidance. It must fairly be assumed that there would be no objection, in the context of the current development plan, to the site's enlargement for similar C1 purposes and that, under the NPPF, a sequential test would not be required for a site within a settlement.
- 3.7 Paragraph 26 requires an impact assessment for out of centre development. However this requirement only applies to retail, leisure and office uses, not tourism, over floorspace threshold of 2,500m² if there is no locally set threshold. The proposed extension to the Littlehampton Premier Inn falls outside of the prescribed list of uses and below this threshold, so an impact assessment is not required.

- 3.8 The associated NPPG contains a section headed: *What should local planning authorities consider when planning for tourism?* (Paragraph: 007 Reference ID: 2b-007-20140306) This guidance indicates that LPAs ...*should consider the specific needs of the tourist industry...* It also points to the best practice guidance available on Visit England's website.
- 3.9 This Visit England Tourism Planning Guidance echoes the NPPF stating ... *There are many types of tourist and leisure activities that particularly lend themselves to cities and major urban locations...* By clear inference, not all tourist and leisure activities and developments belong in urban areas.
- 3.10 The guidance also states that ... *In order to be commercially successful, tourism sites must be accessible to their target market for visitors...* and that ...*Many accommodation businesses of all types want to be located where customers can easily reach them by car...* Many Premier Inns have been built in out of centre locations for this very reason.
- 3.11 While now technically superseded by the NPPG, the *Good Practice Guide on Planning for Tourism* (GPGPT, July 2006) contained far more detailed guidance, which is commended to the Authority. (To put this in perspective, the GPGPT is a 48 page document including a five page annex on Tourist Accommodation. By contrast the whole NPPF is just 59 pages and only contains the word "hotel" once, in Annex 2, its Glossary.)
- 3.12 The GPGPT (Annex 1) drew a distinction between "major hotels" e.g. ...*those with business, conference and banqueting facilities, or large hotels catering for tourists...* and "budget hotels, motels and travel lodges". It indicated that major hotels should be located in town centre sites wherever possible, as should budget hotels designed to cater for longer stays at a destination (e.g. in historic towns and cities).
- 3.13 It went on to state (in paragraph 14 of Annex A) that ... *Other types of budget hotels and similar types of development such as motels and travel lodges cater more for car-born travellers, often for a single overnight stay – eg business travellers en-route to a destination. In such cases, the preference of developers will be for sites on major traffic routes outside of the centre of large towns or tourist centres...*

- 3.14 Most Premier Inn developments are of this motel type, located on main routes, by-passes or inner ring roads, as is the case at this Premier Inn, and so this distinction remains helpful and relevant.
- 3.15 The current guidance is not as clear as its much more extensive predecessor. However, the conclusion can be drawn that the NPPF and associated NPPG support the proposed development. It can also be concluded that a sequential test is not always relevant or necessary, but depends on the type of accommodation being provided and ...*the specific needs of the tourist industry*... The Premier Inn's "need" for this development is founded in the levels of demand that have been experienced at this site. The issue of "need" (i.e. demand) is considered in Section 5 below.

NATIONAL POLICY CONCLUSIONS

- 3.16 The government's intention with regard to the most appropriate locations for hotel accommodation is clear. It is not government policy or advice to say that all hotels are main town centre uses and that all hotels should therefore be located following the process of a sequential site analysis. The NPPF cannot be read in isolation, and it would be wholly inappropriate to judge a hotel development proposal in the context of the NPPF without full reference, previously, to the Good Practice Guide on Planning for Tourism and now to the NPPG and Visit England's guidance. This less than detailed new guidance explains and qualifies more general guidance, making it clear that there are hotels properly to be located in town centres and there are those which, by reference to their scale, purpose, range of facilities, accessibility to public transport, employment-generating potential and, most importantly, to the needs of their users, do not need to be in town centres. In such cases a central location may well be inappropriate and unsustainable, and in such cases a sequential test is inappropriate and unnecessary as the means by which to ensure that the best location is chosen.
- 3.17 There will be instances where the current development plan is not up-to-date, and, in these case, given the more positive and up-to-date approach set out in the NPPF/NPPG, it is the latter that should be afforded the greater weight in the determination of an application. Where there might be apparent discord between

local and national policies, the NPPF should prevail. The LPA's officers are urged by the NPPF to take a positive stance in seeking a pro-active approach. The case for the development can be made.

3.18 Looking at the NPPF, the proposal:-

- Satisfies the requirement for sustainable growth and expansion in urban areas through well-designed new buildings;
- Respects the character of the local area by seeking only to develop on a previously built site;
- Allows for the expansion of facilities in a location where there is an identified need for such facilities;
- Includes provision for an extension that is proportionate in the context of the existing buildings on the site, and is, as such "appropriate development";
- Promotes tourism.

3.19 The development is in compliance with para 70 of the NPPF, insofar as it seeks to retain social / cultural / recreational / tourism facilities, bringing more visitors into the area (this in the face of national and local closures in the catering and hospitality industries) and to plan positively for a modern venue that can meet a wide range of economic and tourism objectives.

3.20 The applicants submit that the proposed development appropriately accords with the provisions of the NPPF as regards:-

- The sustainable use of land;
- The enhancement of community assets;
- Appropriate development; and
- Respect for the local environment.

3.21 The application therefore satisfies national planning policy.

4.0 LOCAL PLANNING POLICY

4.1 The Arun District Local Plan dates from 2003, and, although it is clearly not an up-to-date document, it remains the current planning policy statement for the district. It is also the plan against which the original Premier Inn application was assessed and approved in 2007.

4.2 The principal policy in the local plan, as regards this application, is DEV34 which deals with tourist accommodation. It provides that:-

“Within the built-up area, permission will be granted for the extension of existing or new tourist accommodation and/or tourist attractions provided that proposals are appropriate to the character of their location”.

4.3 This accords with policy GEN2 which defines the settlement boundary and allows that, in principle, development within that boundary will be permitted.

4.4 The LPA's parking standards for hotels (set out in Table 7 of Appendix 2 in the local plan) looks to provide one space per room, while the standards for restaurants seek a maximum of one space per three seats. Parking is considered in the Design and Access part of this statement and in the Transport Statement.

4.5 Other policies, relating to design and local amenity are also considered in Section 6.

4.6 The proposal accords with relevant policies in the local plan.

5.0 IMPACT AND NEED

IMPACT

- 5.1 The guidance in NPPF is the same in respect of impact analysis as it is with regard to sequential testing. Para.26 allows that analysis is not required for development proposals that are below 2,500 sq.m, and, even then, any such requirement only applies to major retail, office and leisure schemes. As the preceding paragraphs have shown, the proposal to extend the existing hotel is in accordance with the NPPF, and, as such, requirements in para.26 do not kick in in this case.
- 5.2 Notwithstanding the above, the proposed addition would have no adverse impact on existing or proposed hotels in nearby centres. The site serves a catchment area that includes traditional town centres, notably Littlehampton, Bognor, Worthing and Arundel , the travelling market arising from movement on the main roads, the A27 and the A24 and the wider tourist attractions that are the coastal attractions and the South Downs. As such, this market is not served only by town centre hotels and the viability on those centres is unaffected by budget hotel development on ring roads, main out-of-town routes and roads which by-pass towns. There are no hotel developments being developed in accordance with the local plan of the type dealing with through visitors on the main road network. The addition of eleven new rooms at a roadside location does not conflict with other hotels which, by definition, can serve a different market and provide a different service. Any competition between the two facilities would be a commercial one and not related to planning policy.

NEED

- 5.3 The requirement for a need analysis was removed from PPS4 and does not apply in the NPPF, and the question of need remains with the operators. The existing annual occupancy rates at the Littlehampton Premier Inn are at about 95.5% (Monday-Thursday) with the Saturday figure matching this (95.2%). Analysis of the most recent data shows that average midweek occupancy ranged from 93.8% (Mondays) to 97.7% (Tuesdays), with Wednesdays and Thursdays in between. Saturday bookings were usually high, understandably so for a facility in an area with so many

tourist attractions. These are generally very high occupancy rates, allowing that it includes periods such as Fridays, Sundays and Bank Holidays when business travel is reduced to a much smaller element. For much of the weekday use the hotel is operationally full and business is being turned away or redirected. Across the Premier Inn estate such figures have been maintained throughout the recession that has affected tourism and business travel as it has other sectors. As the recessionary effects on tourism reduce, the demand for rooms is anticipated to grow. Premier Inn anticipates equally high occupancy rates for the extended hotel.

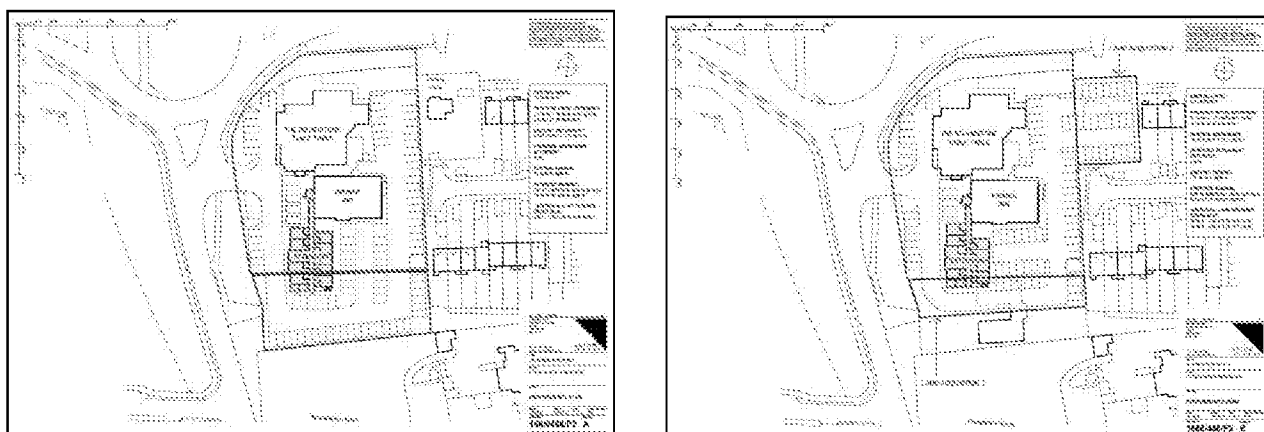
- 5.4 Neither the Tourist Board nor the Local Planning Authority has assessed the need for new or improved hotel accommodation in the area. It is unlikely that such information will be produced as part of the Local Development Framework process. It is therefore down to individual operators to assess the need in terms of their own business plans. Premier Inn's business plan involves a major expansion of its 52,000 rooms, with 3,500 added last year and 700 built through the extension of existing premises since February 2013. The company looks to reach 65,000 rooms by 2016. The budget hotel market, led by Premier Inn, is the main growth area within the tourist accommodation industry.
- 5.5 In assessing the nature of its business at Littlehampton, Premier Inn has had regard to recently secured planning permissions to extend premises at Arundel, (on the A27), Bognor Regis (on the A29) and Havant (also on the A27). Each of these motels are located outside of the town centre on a major highway network along the south coast. Further expansion is planned at Chichester, Fareham and Newhaven. Investigation indicated that most business visitors chose the location because it was within their corridor of travel and part of a trip that involved short stops at various locations, not all of them involving direct business in the nearby town. The motel/business nature of the accommodation is clearly indicated.

6.0 DESIGN AND ACCESS

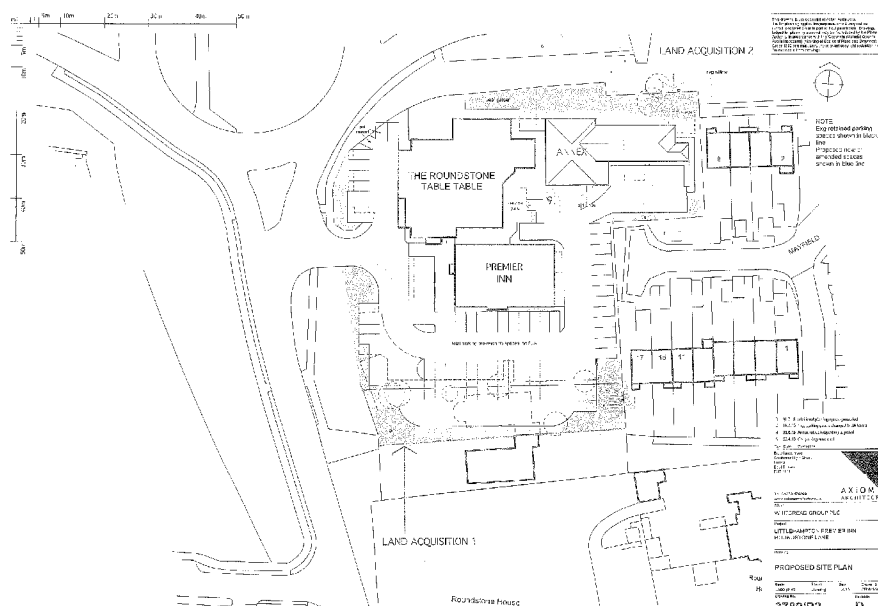
- 6.1 Since 25 June 2013, a design and access statement has only been required for major development. The proposed annexe would fall within the category of non-major development.

LAYOUT

- 6.2 The extension of the Premier Inn facilities could take one of two forms. It could (A) turn a right angle from the existing block, to form an L-shaped block, or (B) take the form of a detached annex somewhere within the available site.
- 6.3 Option (A) involves development that might have been acceptable and two options were included within the pre-application submission. Development on these lines would, however, bring the internal access or car parking close to existing housing, and the LPA's response to this led the applicants to consider an alternative. Option (B) would site the new block on the site of Burberry House, maintaining the presence of a building on the principal street frontage, and, although an annex is sometimes less satisfactory than an extension, in operational terms, it suits the site better. Option (B) is therefore the preferred layout option.



Option A



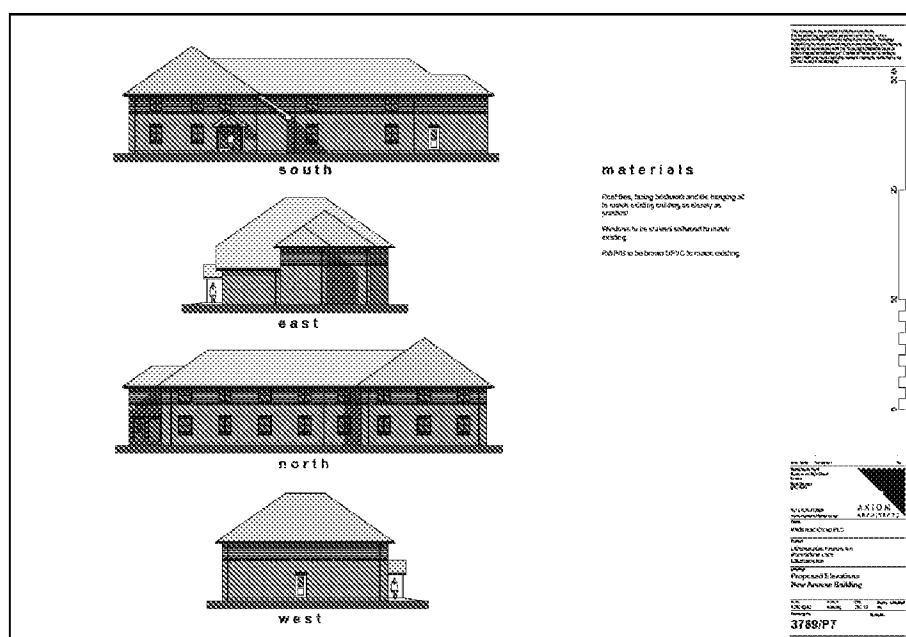
Option B / Proposed Layout (amended after PL50/15/A)

SCALE

- 6.4 As an extension/annex, the additional rooms can either continue the scale of the host building or adopt a subservient scale. While the latter may normally be appropriate in a domestic situation, or in a building with neighbours likely to be affected by loss of privacy or by overshadowing, neither is relevant here. The applicants have, therefore maintained the existing scale for the annexe, which is not dissimilar to that of the demolished house.

DESIGN AND APPEARANCE

- 6.5 An extension/annex can either be a continuation of an existing design or of a wholly dissimilar appearance, by way of contrast. In this case a complimentary design solution is the more appropriate, matching the fenestration pattern and the materials of the host building, and projecting its principal elevation to the street.



AMENITY

- 6.6 The site is not self-contained, but it has always had residential neighbours, both as a pub and as a hotel/restaurant. It is therefore important that existing and new neighbours are not likely to be visually affected by the enlargement of the hotel or inconvenienced by loss of privacy or overshadowing. Provided the development takes the form of Option (B), the applicants believe this to be the case. There will be no direct relationship between the existing housing and the hotel annexe, and the building's flank walls will be set back well within a 45 degree line emanating from the front of the nearest property in Mayfield. No other properties are affected by the proposed building.
- 6.7 Hotels are not noisy land uses or inappropriate neighbours, especially when, like Premier Inn, the operators have a policy of refunding payments to guests whose sleep is disturbed or otherwise inconvenienced. The extended hotel will make use of the existing reception area, so any guest movement will be between the restaurant, reception and car park, as it is at present, with little additional activity outside the annex.

- 6.8 The new rooms will be farther from the road than those in the existing hotel, and, while some will face in that direction, they will be sound-proofed to ensure that there is no disturbance of guests from the road.

PARKING AND MOVEMENT

- 6.9 Premier Inn normally like to operate on the basis of between 0.9 and 1.0 parking spaces per hotel room, the same as most district LPAs, although in major conurbations, with excellent public transport access, considerably fewer spaces are required/provided. The existing site has 73 spaces and the LPA's guidelines concur with the normal guideline of one space per room. For their customers and staff, the operators would therefore provide 40 spaces. The restaurant is both related to the use of the hotel and an independent entity, so it attracts custom from visitors already on the site and on the road network and those who are local and may walk or use public transport. There is, therefore, a strong element of dual use, as hotel guests will tend to dine in the restaurant, thereby using both facilities but only one parking space. Whitbread generally provide fifty spaces or one parking space per table for their restaurants, in this case 44, so the combined requirement from the operators for this site would be 84-90. 86 spaces are available in the scheme, agreed as acceptable in the pre-app/post-app discussions with Ms Gardner.
- 6.10 The proposed spaces would therefore still comply with the operators' requirements and satisfy the LPA's guidelines. The bulk of the parking will be retained in its current location. Provision for disabled drivers is increased in line with the additional rooms.
- 6.11 A Transport Statement accompanies the application

ACCESS AND ACCESSIBILITY

- 6.12 Budget hotels or motels outside town centres are more inclined to rely on access by private car, hence their location on ring roads and on major distributor roads. Guests, especially business travellers, tend to stay for short periods, one or two nights, before moving on as part of a trip which includes similar stops elsewhere. This is recognised in the NPPG / Visit England guidance, though this hotel's location on the main road

network also allows for excellent access by public transport. There are bus stops directly outside the site, linking the hotel to towns to east and west.

- 6.13 Premier Inn developments have a level corridor access throughout the extension and the host building. A lift is not required for a two-storey hotel annex, allowing that all ground floor rooms are wheelchair accessible, and there is a further universal access room on that level, satisfying normal requirements of one such room in every twenty. The reception is always staffed, so as to provide assistance whenever required. The reception area is fully accessible and is not affected by the proposed development. The parking provision includes five dedicated spaces at the entrance to the Premier Inn and the restaurant.
- 6.14 There are visible as well as audible alarms throughout the building and vibrating pillows are available on request.

ECONOMIC IMPACT

- 6.15 As noted in the local plan and the NPPF/NPPG/GPGPT, tourism is important to the local economy. The extension is of a size that will generate new jobs, and those jobs will be recruited locally. Many hotel guests will choose to take meals in the area rather than on the site or on the road. Across the estate this is estimated to be about 40% of all visitors, so, by the crudest of estimates, (20 new rooms, 85% occupancy, 1.2 guests per room x 40%), the extension might lead to up to 3000 visitors per year looking to use dining facilities in or around the town in addition to the normal incidental purchases (provisions, petrol, bus fares, local purchases at newsagents/chemists) made by guests in and around the town. Bringing more visitors to the area will, therefore, have a recognisable benefit to the local economy, without detracting from the scale of the local towns.

CRIME AND SECURITY

- 6.16 Having the annexe at the northern end of the site adds to the element of surveillance, especially of the car park, the lighting of which will be less apparent in respect of the hotel parking because of the enclosing nature of the layout. Any new lighting will match that already in existence, to ensure that there is no inconvenience to nearby

residents and that guests, staff and vehicles may safely use the site, even when shifts or late arrivals / early departures require movement out of daylight hours.

TREES AND LANDSCAPING

- 6.17 There are trees within the application site, primarily in the domestic curtilages rather than within the existing Premier Inn / Roundstone site. The repositioned annexe, following the withdrawn application, reflects the wish to protect a willow tree, outside the site in front of Burberry House, which might otherwise have been directly affected by the proposed building. This potential conflict has been addressed in the resubmission. Any trees lost from within the gardens can be replaced within the site, as necessary. A tree report accompanies the application.
- 6.18 The application includes a full landscaping plan and appraisal, following advice received in the light of the withdrawn application.

ENERGY AND SUSTAINABILITY

- 6.19 The Energy Statement and BRUKL report prepared by/for Jenks Associates accompanies the application.

ECOLOGY

- 6.20 The site and buildings have been considered in the context of existing and potential habitats. A full report accompanies the application.

7.0 CONCLUSIONS

- 7.1 The development meets an increase in demand in an acceptable manner and expands an already established business. The proposal will expand local employment opportunities both directly and indirectly and will increase visitor spending in the area.

- 7.2 The proposed site for the extension lies inside the settlement boundary of Littlehampton, where the principle of hotel use is well established, not least by the previous permission. An extension to provide additional bedroom accommodation will not materially affect the surrounding locality.
- 7.3 The design of the proposed annexe in terms of scale, size and appearance will not affect the character or appearance of the buildings within the site or those in terms of the wider surrounding locality. It has been shown that the proposed number of car parking spaces will adequately support the existing hotel and restaurant and the proposed bedroom annexe.
- 7.4 The annexe is on a developed site with easy access to alternative modes of transport other than the private car and therefore the existing site is within a sustainable location.
- 7.5 A hotel annexe on this site complies with both national and local policy.
- 7.6 The application is commended to Arun District Council.

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JULY 2015

