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<b>APPLICATION NO.</b>	20/00701/FULLS
<b>APPLICATION TYPE</b>	FULL APPLICATION - SOUTH
<b>REGISTERED</b>	16.04.2020
<b>APPLICANT</b>	Mr Tim Lincoln
<b>SITE</b>	The Abbey Hotel, 11 Church Street, Romsey, SO51 8BT, <b>ROMSEY TOWN</b>
<b>PROPOSAL</b>	Demolition of toilet blocks to rear and conversion, alterations and extension to provide four dwellings comprising a two-storey two-bedroom house, a three-bedroom maisonette, a two-bedroom and a one bedroom flat; provision of external staircase
<b>AMENDMENTS</b>	Amended Plans and/or Additional Information 13.05.20, 14.05.20, 18.05.20, 26.05.20, 29.05.20, 20.07.20 & 28.07.20.
<b>CASE OFFICER</b>	Mr Paul Goodman

Background paper (Local Government Act 1972 Section 100D)

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## 1.0 INTRODUCTION

- 1.1 The application is presented to Southern Area Planning following deferral from the committee of 25 August 2020.
- 1.2 Members of Southern Area Planning Committee (25<sup>th</sup> August 2020) resolved to defer consideration of the application to enable Officers to undertake further discussion with the applicant to:
- Understand the justification for the loss of tourism accommodation in the Romsey area;
  - Discuss the provision of on-site parking to serve the development; and
  - Seek an understanding of the comprehensive plan for the site which lies within the Romsey Conservation Area.
- 1.3 The relevant sections of the report have been expanded to address these issues.

## 2.0 SITE LOCATION AND DESCRIPTION

- 2.1 The application site is prominently sited opposite the entrance to Romsey Abbey, within the primary shopping area and conservation area. The Abbey Hotel is a late C19 building, and has a Tudor style frontage. The ground floor is brick, with a Jacobean-style stone door surround, and the upper floors are black and white with planted timbers. The application also includes the upper floors of the adjacent properties of 7-9 Church Street.

### 3.0 **PROPOSAL**

- 3.1 The application proposes the demolition of toilet blocks to the rear and conversion, alterations and extension to provide four dwellings comprising a two-storey two-bedroom house, a three-bedroom maisonette, a two-bedroom and a one bedroom flat; provision of external staircase.
- 3.2 Representations have drawn reference to the change of use of the ground floor public house area to a retail use. However the applicants have advised that those works are being undertaken under permitted development rights. In any event they do not form part of the current application under consideration.

### 4.0 **HISTORY**

- 4.1 20/00385/FULLS - Lower height of ground floor window sills on west elevation. Permission 14.04.2020.
- 4.2 16/00124/ADVS Replacement of externally illuminated and non-illuminated fascia signs, hanging sign, board signs and shop letters. Consent 29.03.2016.
- 4.3 15/02235/FULLS Remove corrugated roof to rear toilet block and out house and replace with Welsh slate roof covering, remove external fire escape staircase and install balcony above existing toilet block, replace all windows with like for like double glazed timber windows, demolish timber outbuilding to rear, erection of two timber framed pergolas, and provision of replacement steps and retaining wall between lower and raised level in garden. Permission subject to conditions and notes 11.02.2016.
- 4.4 TVS.4420/1 First floor extension and fire escape - The Abbey Hotel, Church Street, Romsey. Permission subject to conditions – 07.07.1989.
- 4.5 TVS.04420 Rear ground floor extension and alterations to form toilet block - Abbey Hotel, Church Street, Romsey. Permission subject to conditions – 12.09.1984.

### 5.0 **CONSULTATIONS**

#### 5.1 **Planning Policy & Transport (Policy) – Comment:**

- In response to the additional evidence provided by Savills with regards to the marketing on the property it is noted from their statement that during the marketing of the Abbey Hotel that they did not receive any serious interest from any other hoteliers other than Premier Inn however this did not proceed into an offer. There was also no interest from those seeking to establish a bed and breakfast business. The Savills agent surmises the derelict condition of the upper floors and the likely costs of renovation being the most likely reason for the lack of interest.
- However it should be noted that with regard to the demand for additional tourist accommodation in Romsey, a 2019 Test Valley Hotel Market Fact File study which was carried out states that there are only 2 hotels in Romsey providing 39 rooms; The White Horse and The Cromwell Arms both of which offer high end accommodation. It concludes that a number of indicators suggest demand for hotel accommodation will continue to grow across Test Valley, but it is dependent upon wider

issues including Brexit and the national economy more generally. This is a material consideration.

## 5.2 HCC Highways – No objection

## 5.3 Planning & Building (Conservation) – Objection;

- The outbuildings clearly have significance as part of the overall group of buildings. The latter are non-designated heritage assets, located in the important designated heritage asset that is the Romsey conservation area.
- The need for the rebuilding of part of the structure and for its general repair is observed. However, no information is provided as to what this would entail or the practicality or otherwise of undertaking this work. There is no indication that the buildings are ultimately unusable and certainly no suggestion that their removal would result in an overriding public benefit, as required for the justification of any such demolition by Local Plan Policy E9.
- The heritage assessment describes this range of buildings as having a negative impact on the character of the conservation area. This assessment appears to be based merely on their condition. However, as they are intrinsically interesting, appear to be repairable and are seen from public spaces, this judgement cannot be agreed with. It remains the view that they make a positive contribution to the significance of the conservation area and the other heritage assets the setting of which to which they contribute. Their demolition would result in harm to the significance of these heritage assets. In the case of the buildings themselves, the harm would, inevitably, be 'substantial'; in the case of the other assets it would be 'less than substantial' (which is not the same as 'insubstantial'). 'Substantial' harm is, of course, a very high bar. National guidance and local plan policies require any 'less than substantial' harm to be avoided unless this would be outweighed by a public benefit. No public benefit is convincingly argued.
- The heritage assessment does not provide the views from the public, and semi-public viewpoints identified in the previous D & C comments. Some are self-evident, such as those from the garden of King John's House, others may be less so. Such an exercise, showing the scheme in its heritage context, is crucial to allow the assessment of the impact of any proposals in a conservation area.
- The revised proposals regarding the proposed fenestration on the southern slope of the roof of the former function-room wing are a welcome improvement. Presumably the change is an acknowledgement of the validity of the previous D & C comments in respect of this element of the proposals.
- There has been no change in the proposals regarding the roof lights in the north slope of the roof and nor is the impact of this part of the proposals described and assessed in the heritage statement. The significance of the wing, as a former function space, is explained, but the proposals are not discussed in the light of that observation. It does acknowledge that the south side of the roof, while not 'invisible', has a

considerably lower visibility in the conservation area than the north slope, which furthermore is seen in the context of much of the main building and the outbuildings.

- Roof glazing as proposed may be an appropriate means of lighting the interiors, but it will still significantly change the appearance. A number of options are possible, and there may be no 'right' answer, but the heritage statement does not explain why the current solution was decided upon and how it minimizes the harm to, or indeed does not harm, the significance of the assets.

5.4 **Housing & Environmental Health (Environmental Protection) – No objection, subject to condition.**

5.5 **Natural England – No objection.**

5.6 **HCC Ecology – No response received.**

6.0 **REPRESENTATIONS** Expired 19.08.2020

6.1 **Romsey Town Council – Objection;**

- Romsey Town Council regrets the proposed loss of the Abbey Hotel as a pub, restaurant, function rooms and hotel accommodation. The tourism strategy developed by Romsey Future indicates a need for further hotel/b&b accommodation in Romsey especially in the historic area adjacent to King John's House and opposite the Abbey.
- In addition, the Abbey Hotel has historically been a part of Romsey's social hub and its loss would be sorely missed.
- Specifically, we object on planning grounds as follows:
- LE18 – Loss of tourist accommodation requires proof that it is no longer economically viable. No such evidence is proved.
- E5 – There is a need to assess and, potentially, mitigate the impact on the New Forest SPA.
- E9 – The Abbey Hotel is in the conservation area and adjacent to a listed building, King John's House. As such it is necessary to demonstrate the impact this proposed development will have on the local heritage.
- LHW4 – Inadequacy of amenity space for each of the proposed dwellings.
- T2 – Inadequate parking provision.
- Nitrates. There is a need to assess and mitigate the increased nitrate load of this development as it will impact the Solent SPA.
- E9 - the garden should be included in the application to ensure that the totality of the premises is included.
- LE12 - is there a legal entitlement to change the use of the ground floor from A4 to A1 retail use? This premises was not a drinking establishment per se as this was also a restaurant area for hotel guests.

6.2 **Romsey & District Society (Planning Committee):**

- Contrary to the aims of the Romsey Future project.
- The application refers to a single bed flat which is not shown in the layout drawings.

- It assumes a change in use from A4 to A1 on the ground floor which requires planning permission [change of law - 2017].
- There is no rigorous evidence offered to prove the public house/hotel is not commercially viable. Leaving the building to deteriorate is not a justification.
- The Abbey Hotel is a landmark building in a prestigious area of the town with historic links with Romsey Abbey. Under this proposal, a ground floor site will be turned into a low footfall showroom with housing above without any associated parking. Approval would be given without any knowledge of intentions for the remainder of the site. The proposal will result in the loss of a useful town centre group meeting and dining facility.

**6.3 Romsey & District Society (Natural Environment Committee) – Objection;**

- The ecological survey mentions the stream running through the site, but it is not shown on any of the plans, nor is there any ecological assessment of it.
- At least one further bat survey of dusk emergence or dawn re-entry is required.
- Whilst we would be pleased to see more trees in the town centre area, as suggested by the Ecology report, we note that the application refers to repairs and replacement of roof where appropriate. We would like to see more weight given to the beneficial effects that such existing old buildings in the town centre have in providing opportunities for wildlife, and the importance of preserving these when buildings in the town centre are redeveloped.
- No examination or mitigation for nitrate neutrality appears to have been carried out.

**6.4 16 representations of Objection received:**

- Impact on the historic setting of the Abbey Hotel and surrounding area.
- Lack of parking provision.
- Loss of Pub/Hotel uses and accommodation detrimental to the viability of the town. Contrary to Policy LE18.
- Shortage of affordable accommodation in Romsey.
- No need for more retail space or housing.
- Proposed housing would not be affordable.
- Loss of facilities to attract visitors to Romsey.
- Change of use to residential contrary to Policy LE12.
- Loss of community facility provided by the function hall contrary to Policy COM14.
- Loss of employment from change of use to retail unit.
- Concern that the former garden area has not been included in the application site.
- Impact of large delivery vehicles to the retail unit.
- Increased pressure on doctor's surgeries.
- Plans should incorporate the whole site and others in the same ownership.
- Any development should retain the present front façade.

- 6.5 **1 representation neither supporting nor objecting:**
- Not enthusiastic about this tight redevelopment but if the building is not viable as a hospitality venue this is a reasonable use.
  - Concerned about the number of properties being proposed, especially as there will be no parking available. Residents should not have access to the resident parking scheme.
  - The building is not listed, though in the conservation area, and it would be good to have the street elevation looking smart again.

## 7.0 **POLICY**

### 7.1 **National Planning Policy Framework 2019**

7.2 **Test Valley Borough Local Plan 2016 - COM2 (Settlement Hierarchy), COM4 (Community Facilities), E1 (High Quality Development in the Borough), E2 (Protect, Conserve and Enhance the Landscape Character of the Borough), E5 (Biodiversity), E7 (Water Management), E8 (Pollution), E9 (Heritage), LHW1 (Public Open Space), LHW4 (Amenity), T1 (Managing Movement), T2 (Parking Standard).**

### 7.3 **Look at Romsey**

## 8.0 **PLANNING CONSIDERATIONS**

The main planning considerations are the principle of development, the character of the site and surrounding area and the setting of heritage assets, the amenities of neighbouring properties, protected species and highways issues.

### 8.1 **Principle of Development**

The site lies within the settlement area of Romsey and therefore the principle of development and re-development for housing is accepted in accordance with policy COM2, subject to adherence with the other policies of the TVBRLP.

### 8.2 **Loss of Tourist Accommodation**

Policy LE18 (Tourism) states that proposals which involve the loss of serviced accommodation (Class C1) and non- serviced tourist accommodation will only be permitted provided that it can be demonstrated that the existing living accommodation unit is no longer economically viable or required.

8.3 The application site has been vacant for a number of years at the time of the application. However a 2019 Test Valley Hotel Market Fact File study states that there are only 2 hotels in Romsey providing 39 rooms; The White Horse and The Cromwell Arms both of which offer high end accommodation. It concludes that a number of indicators suggest demand for hotel accommodation will continue to grow across Test Valley.

8.4 Following initial concerns raised by the Policy Officer further details of the previous marketing of the site have been provided (Savills, June 2020). In this case it is evident that Saville's had acted for the previous owner prior to the recent purchase by the current applicant. The marketing information reveals no

serious interest from any other hoteliers other than a proposal for redevelopment of the site by Premier Inn which did not proceed to an offer. The report does identify that 2 viewings were by potential operators of a bar/restaurant business but that they did not take forward their interest as they formed the conclusion that the investment required to re-fit the property was too great. There was also no identified interest from those seeking to establish a bed and breakfast business. The marketing information indicates a far larger number of enquiries and expressions of interest from persons looking to redevelop the site for alternative uses.

8.5 Following the deferral from the previous committee a more detailed summary of the marketing undertaken is provided below;

- The property was advertised with a guide price of £1.6m for the freehold interest, with vacant possession of the derelict parts of the property but subject to and with the benefit of the leases of the hairdresser and photo shop. The Client also made it clear that leasehold offers would be considered.
- A 'Freehold For Sale' marketing board was erected on the property on 20th June 2019 in order to maximise exposure to the local market and passing traffic.
- An e-campaign was launched on 2 August 2019 to our mailing list comprising commercial and residential owners and occupiers of property. Within the list of applicants, there are pub operators, hoteliers, restaurant users, commercial users, community users, developers and investors.
- The mailing list totals 7,100 applicants all of whom have registered with Savills to receive details of the properties we are selling or letting. A high proportion of the applicants are specifically interested in the licensed trade although many are also considering properties for a range of uses not limited to the licensed trade and hotel sectors. The property has therefore been marketed to a wide audience in an effort to capture a range of offers and to expose the premises to parties considering the potential to use such a building for alternative uses.

8.6 The marketing report reveals that:

- A large number of enquiries from prospective purchasers of the property, although the majority of interest was expressed from developers/speculators looking to redevelop the property to alternative uses.
- A total of 29 serious expressions of interest were received during marketing process.
- Saville's conducted 6 viewings but suspect that the number of parties viewing the details online and inspecting externally is in excess of this figure but cannot verify.
- Saville's believe that 2 of the aforementioned viewings were by potential operators of a bar/restaurant business. They did not take forward their interest as they formed the conclusion that the investment required to re-fit the property was too great.

- Saville's received an enquiry from Premier Inn who had a requirement for Romsey at the time however the site was too small for a purpose built 60 bed hotel.
- 8.7 As is indicated above only two formal offers were made for the property, including the new owner/current applicant. The enquiry on behalf of Premier Inn is notable but the site is clearly unsuitable for redevelopment for a hotel of that size. In addition it must be acknowledged that the market was undertaken prior to the current Covid-19 health crisis which has further significantly depressed investment prospects in tourist industries.
- 8.8 TVBC published its own Hotel Market Fact File (July 2019) which provides the latest available information on:
- The current hotel supply in the borough of Test Valley;
  - Recent hotel development;
  - Current hotel development proposals;
  - Recent hotel performance (2016-2018)
  - The key markets for hotel accommodation in the borough;
  - The future prospects for borough's hotel market.
- 8.9 The Fact File does illustrate some investment in existing hotels which is also illustrated by recent planning applications. However the investment has been driven predominantly towards budget hotels with close access to the cruise terminals (The Premier Inn, Nursling) and other local attractions such as Paultons Park (The Premier Inn, Ower) and the Science Park/wedding venue at Chilworth Manor. The authority has received applications for smaller scale self-catering accommodation in rural areas along with a recent application for serviced accommodation at the Dukes Head outside Romsey. However those applications have been targeted at a rural pursuits market including fishing parties, shooting parties and walkers. The Fact File further reveals that midweek markets for Test Valley's 3-star hotels are local corporate demand from companies in Andover, Winchester, Chandler's Ford, Romsey, Eastleigh and Southampton, and business from contractors working on construction projects. Residential conferences are identified as a minor midweek market and only two hotels attracted some midweek leisure break business in the summer months. Contractor demand appears to have been broadly constant.
- 8.10 Overall the Fact File illustrates a fractured tourism market with investment focused on smaller scale rural accommodation and higher cost boutique markets. Combined with the lack of willingness to invest by the previous owners and the marketing undertaken this does not illustrate any strong demand which would generate the required investment to renovate the application site for tourist accommodation use.
- 8.11 Notwithstanding any potential for future tourist accommodation demands it is evident that there has been no substantive interest in re-opening the site as a hotel or alternative form of tourist facility. This appears to be, at least in part, due to the cost of renovating the property which is in a somewhat poor internal state of repair. Whilst these circumstances have existed for some time future



investment in the hospitality industry is likely to be further suppressed by the economic pressures associated with Covid-19 and the wider national economy.

8.12 The submitted information is considered to adequately demonstrate that the continued use of the site as a hotel is not economically viable and its change to an alternative use would therefore comply with Policy LE18. A number of representations have suggested that the site should be safeguarded for an extended period to seek a tourism occupier. However it is not considered reasonable to impose any further period of the building being unoccupied where no evidence of a forthcoming hotel user exists.

8.13 Community Services & Facilities

Policy COM14 States that development (including the change of use of existing premises) which involves the loss of local shops or public houses will be permitted if it can be demonstrated that: the use is no longer or cannot be made commercially viable; or the building can no longer provide suitable accommodation; or is no longer needed for the existing use. Development involving the loss of cultural and community facilities and places of worship will be permitted if it can be demonstrated that: there is no longer a need for that facility for its existing use or another community use; or the building can no longer provide suitable accommodation.

8.14 Numerous objections have referred to the loss of the public house and the impact of relocating the existing kitchen showroom to the ground floor of the application site. As is clarified above (para 3.2) those works do not form part of the current planning application and cannot be taken into consideration in its determination.

8.15 Reference has also been drawn to the former function room to the rear of the site as a community facility. However the function room formed part of the wider private hotel enterprise. It has not been formally identified as an 'Asset of Community Value' and is not considered to represent a community facility as identified by Policy COM14. In any event its viability is part and parcel of the wider hotel discussed above in relation to Policy LE18. The proposal does not therefore conflict with Policy COM14.

8.16 Conclusion on the Principle of Development

The change of use and conversion of the property complies with Policy COM2. The submitted information has demonstrated that there is no investment interest in the continued use of the site as a hotel and the proposals therefore comply with Policy LE18 and are acceptable in principle. Furthermore, there is no identified conflict with Policy COM14.

8.17 **Character and Appearance**

The majority of the proposed works are internal and the associated alterations to fenestration, including the insertion of rooflights on the north and south roof slopes of the rear extension, to provide access and amenity to the proposed residential accommodation. Other external alterations include the demolition

and replacement of an existing toilet block to the rear of No's 7-9 and the provision of an external staircase to the rear of the building. The property is not listed but is situated within the Romsey Conservation Area and in proximity to other town centre listed buildings.

8.18 Impact on the Setting of Heritage Assets

Sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 require special regard to be had to the desirability of preserving the listed building or its setting or any features of special architectural or historical interest which it possesses. In addition, Policy E9 of the TVBRLP requires that development preserves or enhances the historic significance and special interest of designated heritage assets.

Furthermore Para 197 of the NPPF 197 requires the effect of an application on the significance of a non-designated heritage asset to be taken into consideration. The application site is considered to be one such asset.

8.19 The Conservation Officer has advised that former hotel was built c. 1890, as part of the redevelopment of the east side of Church Street instigated by a road-widening scheme. Along with Nos 1-9 (odd) it can be seen as part of a late C19 programme of metropolitan improvements. It replaced an older inn here, the Market Inn, which stood further out into the road. The original ornate Georgian wrought-iron bracket has been reused on the rebuilt inn. There is also some indication that stone cellars associated with the earlier building have also survived.

8.20 Nearby heritage assets include the Romsey conservation area and a number of neighbouring listed buildings (e.g. Tudor Cottage and King John's House (Grade I) to the north, 2-8 Church Street (even), and the rear elevations of 13-19 Market Place). A number of other buildings which are unlisted, but should be considered buildings of local interest in the conservation area (undesigned heritage assets) are potentially affected, including Nos. 3-9 (odd) Church Street, and 13 Church Street, to the north of the site.

8.21 The Conservation Officer raised concern with regard to the original submission that the application was not accompanied by an adequately detailed heritage statement to show evidence that the impact of the proposals on the significance of the assets described has been assessed and the design produced with the potential impact in mind. A further heritage statement has been submitted. However the Conservation Officer, which acknowledging the assessment provides further useful information, has continued to raise concern that the additional assessment been written after the proposals have been formulated and not, as required by the Policy E9 of the Local Plan, informed them. The Conservation Officer has further commented that heritage statement does not explain why the current solution was decided upon and how it minimizes the harm to, or indeed does not harm, the significance of the assets.

8.22 Paragraph 189 of the NPPF states that 'The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance'. It is evidently not possible for the applicant to provide additional information during

the life of the application which does not reflect the proposals already submitted. Notwithstanding any deficiency in the originally submitted heritage information, and considering that the application site itself is not listed, the proposed works are clear from the application and it is considered that adequate information is available to assess the proposals impact on heritage assets.

- 8.23 No works are proposed to the western elevation which faces onto Church Street and the Abbey beyond. Works to the ground floor windows in this elevation have been permitted under application 20/00385/FULLS and are not for consideration under this planning application.
- 8.24 Public views of the remaining elevations are obscured to various degrees by the surrounding development. Whilst views from the adjacent St Johns House are relevant to its setting as a Grade 1 listed building, these views are from what remain private gardens accessible to the public on a restricted basis. They are not considered to be truly public vantage points. The nearest public vantage points are within the Lortemore car park approximately 50m east, and form the public right of way between Market Place and Latimer Street running through the White Horse site to the southeast. Neither the public nor semi-public vantage points would provide views of the ground floor fenestration and toilet block replacement. Views are limited to the fenestration alterations to the south/north, most notable the proposed roof lights in the former function room.
- 8.25 The proposed roof lights on the southern roof slope have been amended in accordance with the Conservation Officers advice but the roof lights in the northern elevation remain as previously proposed. The northern roof slope is more visible in the context of the surrounding buildings from the public views the south, although those views remain restricted as described above. The Conservation Officer has advised that roof glazing as proposed may be an appropriate means of lighting the interiors, and has identified that a number of options are possible, and there may be no 'right' answer, but has raised concern that the heritage statement does not explain why the current solution was decided upon and how it minimizes the harm to, or indeed does not harm, the significance of the assets. It is noted however that roof lights are common on the rear elevations of those properties facing Church Street and visible from the east.
- 8.26 Again it is considered that adequate information is available to determine the application and that to require further assessment of the site, which is a non-designated heritage asset, would not be reasonable. In his initial response the Conservation Officer advised that "It would appear that there would be harm (less than substantial, most probably) to the significance of the heritage assets affected as a result of these proposals. Notwithstanding any concern regarding the quality of the heritage assessment undertaken the proposed conversion works are limited to the rear/side elevations of the property restricting their impact on the setting of the nearby heritage assets and the application site itself. Taking into consideration the above it is considered that the introduction of roof lights into the property is not an uncommon feature within the immediate locality and will result in a neutral impact on the setting of the conservation area and adjoining listed buildings.

- 8.27 The only potential area where harm could be identified is the demolition and replacement of the small toilet block to the rear of the site. However the toilet block has not been identified as being of any historic significance and it would therefore be difficult to justify substantial harm as advocated by the Conservation Officer. The works are considered to result in, at most, less than substantial harm to the heritage asset and its surroundings. Indeed the majority of the works are internal or not visible from public views.
- 8.28 Members of the committee in deferring the application were concerned that the proposals did not deal with the whole of the former hotel site and what potential impact any further development could have on the conservation area. The applicant has confirmed that the rear of the site is being evaluated for future development but this does not form part of planning application number 20/00701/FULLS. The applicant has further advised that they have been in discussion with the Trustees of King Johns House, local Councillors and other interested parties to assess the best form of development for this sensitive site. It is understood that an application will be forthcoming next year but there are currently no detailed plans available. In any event the current application, and any future proposals for the remainder of the site or other areas in the applicant's ownership, must be considered on their own merits. It is not considered that a reason for refusal on the basis of potential unknown future development could be sustained.
- 8.29 As some harm has been identified any works to a heritage asset must be considered in the context of any public benefit from the scheme. In this case there is a clear public benefit in returning the long vacant building to productive use and the associated economic benefits, indeed Para 196 of the NPPF states 'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. As evidenced above the proposal does secure its optimum viable use and significant weight should be afforded to this matter. This is discussed in more detail below. As a result the proposed development is considered to comply with Policy E9 and the NPPF.
- 8.30 **Amenities of neighbouring properties**  
Policy LHW4 of the RLP sets a number of criteria against which development proposals will be assessed in order to safeguard the amenity of existing and future residents, particularly in terms of overlooking, loss of privacy and any adverse impact in terms of loss of daylight/sunlight.
- 8.31 Given the limited extent of the proposed extension works and new fenestration, combined with the predominantly commercial uses of adjacent properties, the proposed development is considered to have no adverse impact on neighbouring amenity as a result of overlooking, overbearing or overshadowing impact.

### 8.32 Noise

Given the proximity of the proposed residential dwellings to neighbouring commercial uses the Environmental Protection Officer required the submission of a noise impact assessment. The assessment (Venta, May 2020) has now been submitted and the Environmental Protection Officer has raised no objection subject to condition requiring development to be undertaken in accordance with the recommendations of the assessment and a further verification report to be submitted prior to occupation of the development. Subject to the required condition the proposed development is considered to adequately provide for the amenity of future occupiers in relation to noise and complies with Policy E8.

### 8.33 **Biodiversity & Protected Species**

#### 8.34 Protected Species

The application is supported by an Ecological Appraisal (ecosupport, March 2020) which includes thorough survey work for bats and a mitigation strategy. This report confirms that the building on site is of low potential for roosting bats but recommended an emergence survey be undertaken. The subsequent emergence survey has now been submitted and reveals an emergence location of 2 Common Pipistrelles from under the wooden fascia on the gable end of the rear extension. The proposed development does not include alterations in this area and as a result the development is considered to have no adverse impact on protected species.

#### 8.35 Solent and Southampton Water SPA – Solent Neutrality

There is existing evidence of high levels of nitrogen and phosphorus in the water environment across the Solent, with evidence of eutrophication at some designated sites. An Integrated Water Management Study for South Hampshire was commissioned by the Partnership for Urban South Hampshire (PUSH) Authorities to examine the delivery of development growth in relation to legislative and government policy requirements for designated sites and wider biodiversity. This work has identified that there is uncertainty regarding whether any new housing development does not contribute to net increases in nutrients entering these designated sites.

8.36 As such, the emerging advice from Natural England is that the applicants for development proposals resulting in a net increase in dwellings are required to submit the nitrogen budget for the development to demonstrate no likely significant effect on the European designated sites due to the increase in waste water from the new housing.

8.37 In this case the current use of the site as a hotel is comprised of 9 letting rooms and 1 unit of manager's accommodation. The hotel has not operated for some time and is in new ownership. As a result there is no details of the previous occupancy rates available. However the Test Valley Hotel Market Fact File (copy attached) provides the latest available information regarding occupancy levels at the Borough level. Occupancy levels for Test Valley 3\* Hotels is reported as 74.8% for 2017 and 77.3% for 2018.

- 8.38 The Test Valley Hotel Market Fact File does not distinguish between single and double occupancy of rooms and the applicant has sought further advice from a consultant (Kevin Marsh MRICS, June 2020). The submitted information concludes that Abbey Hotel would have been primarily leisure guests staying for weddings, sight-seeing in the Test Valley, attending events at venues like Mottisfont, Broadlands, etc. Leisure guests are accepted to be more likely to result in double occupancy of a room compared to business guests. The letter provides some anecdotal information on a similarly sized local facility within a pub with 10 letting bedrooms in Romsey with 80% occupancy of which approximately 60% of the occupied rooms were occupied by couples.
- 8.39 As a worked example the report concludes that “In terms of the population calculation for a hotel, this means that if a room is occupied 80% of the year this it is occupied for say 292 days. Of those occupied days, 60% (i.e. 175 days) would be occupied by couples (producing a population of 350), with 40% (117) by single persons. The overall population would therefore be 467 persons per room per annum - or an average of 1.25 people per day.”
- 8.40 The initial NE consultation advised that “Natural England advises that the Council, as competent authority, may choose to adopt bespoke occupancy calculations tailored to the scheme where they are satisfied there is sufficient evidence to support this approach. The Council should be confident that the occupancy use is precautionary and based on sound evidence and that the staff accommodation was a permanent residential address. The Council should also be confident that the using 110L as the water use rate for the existing use is evidence based and precautionary.
- 8.41 With regard to the occupancy levels the Council is satisfied that the stated occupancy levels are reasonable and based on the best available information. Given that the Councils own reported occupancy figure for previous years is slightly lower at 74/77% it is considered reasonably precautionary to adopt a reduced occupancy level of 1.0 persons per room, per day. With regard to the manager accommodation for planning purposes the manager flat is not encumbered by any restriction and could be occupied in the same manner as any other dwelling.
- 8.42 With regard to the water use of the existing hotel use of the 110L figure is considered to be suitably precautionary. Given the dated water fixtures in the existing building it is highly likely that efficiency is well below modern Building Regulation standards for water efficiency. Furthermore the proposed development can be permitted subject to a condition requiring compliance with improved water efficiency standards in accordance with Policy E7.
- 8.43 The development would result in a decrease in nitrates entering the catchment. Therefore, when considered in combination with other plans and projects, this development would not have a likely significant effect on the suite of Solent designated sites.

8.44 New Forest SPA – Recreational Pressure

The project being assessed will result in a net increase of dwellings within 13.6km of the New Forest SPA site. As established in the HRA of the Test Valley Borough Revised Local Plan DPD, a permanent significant effect on the New Forest SPA site due to increase in recreational disturbance as a result of the new development, is likely. As such, in order to lawfully be permitted, the proposed development will need to include a package of avoidance and mitigation measures.

8.45 As is detailed above the development will result in an overall decrease in persons resident at the site and consequently, the proposed development will not affect the status and distribution of key bird species and therefore act against the stated conservation objectives of the European sites.

8.46 A Habitat Regulation Assessment (HRA), Screening Matrix and Appropriate Assessment Statement based on the above has been submitted to Natural England who have raised no objection. As a result therefore not result in adverse effects on the Solent designated site through water quality impacts arising from nitrate generation.

8.47 **Highways**

The proposed development includes no parking provision for the new dwellings. Policy T2 states that Development (including change of use and conversions) will be required to provide parking in accordance with the standards set out in Annex G. Parking provisions should be well designed and appropriately located so as to be convenient to users.

Residential parking provisions below the standards will be considered:

- a) where there is likely to be low demand for parking;
- b) where there are significant heritage or urban design issues;
- c) where any parking off site is appropriately controlled.

It will be necessary for applications to be accompanied by evidence justifying variations from the standards.

8.48 The Highways Officer raised initial concern that, whilst a car free development would not be objected to in principle in a town centre location, no assessment of public transport accessibility and the availability of off-development parking capacity was not submitted with the application. In addition the Highways Officer required further information in relation to how the proposal is to be serviced, by refuse collection and delivery vehicles.

8.49 As a result a Sustainability and Accessibility Assessment (Eric Woodgate, May 2020) has been submitted. The assessment has highlighted the proximity of the site to local services and public transport all of which are within the recommended guidance distance for access on foot. With regard to parking controls in the vicinity of the site the development lies within the Romsey Inner Permit Zone which is an on-street Controlled Parking Zone (CPZ).

8.50 From the 1st April 2020 Hampshire County Council control and enforce all Residential Parking Permits within Romsey and across Test Valley Borough Council and the report states that “There is every indication that no new development will be provided parking permits, nor provided with visitors parking permits.” It is not clear what information this assertion is based on but in any event control of on-street parking permits will be at the discretion of HCC. The assessment also provides details regarding refuse collection and clarification regarding servicing arrangements.

8.51 Notwithstanding the comments of the Highways Officer and the lack of access to parking permits to prospective purchaser’s members of SAPC were concerned that the proposals would lead to increased on-street parking pressures outside of the restricted zones. The applicant has clarified that whilst the area to the rear of the site previously was used as car park for the hotel use this was removed by the previous owners to make way for provision of a patio amenity area. As a result the remaining rear area was restricted to vehicles servicing building (deliveries, refuse collection etc.) and for access to the adjacent dwelling of 13 Church Street. As a result the hotel when last in use did not benefit from on-site parking for residents.

8.52 Annex G of the TVBRLP details the parking standards in relation to Policy T2. A comparison of the total parking provision as required by Annex G is provided in the table below. This is comprised of the requirement for 2 parking/cycle spaces per new dwelling. The requirement for the former hotel use is comprised of 1 space for the manager’s accommodation and 1 space per room of tourist accommodation. The cycle standard for hotel accommodation is based on 1 space per 5 bedrooms of accommodation and 1 space per 6 members of staff. No information on previous staffing levels is available but it is assumed that at least 1 cycle space would have been required.

8.53	<b>Hotel Use</b>	<b>Proposed Development</b>
<b>No. Parking Spaces</b>	10	8
<b>No. Cycle Spaces</b>	2	8

8.54 As is described above, at its last use, the hotel did not provide for any parking resulting in a pressure of up to 10 users seeking parking in the area. The proposed use would result in a lower pressure on on-street parking and provides the full requirement for cycle storage on site. As a result the proposed use would result in a reduced need for on-street parking compared to the hotel use. Notwithstanding the above comparison any prospective purchaser would be clear that the proposed dwellings do not benefit from on-site parking and that there would be no access to parking permits in the locality. As is considered in the transport assessment the site is situated in a sustainable location and car free occupation is not considered to be unrealistic.

8.55 Following review of the Sustainability and Accessibility Assessment it is considered that the site would generate a low demand for parking and that off-site parking is suitably controlled. The Highways Officer has raised no objection to a car free development in this location which is considered to comply with Policy T2.



#### 8.56 **Economic Benefits**

Whilst the proposals would result in the loss of the hotel business the site has been unoccupied for some time and as assessed above there is identified prospect of a new tourist enterprise occupying the building. There are economic benefits associated with the development works and the future occupiers of the dwellings. Furthermore, the development is located in close proximity to the Town centre and the NPPF at Para 85 recognise that residential development often plays an important role in ensuring the vitality of town centres. These are matters that should be afforded weight in the planning balance.

#### 8.57 **Social Benefits**

Whilst the loss of tourist accommodation is regrettable, and notwithstanding the Conservation Officers comments, it is considered that investment in the building, which is situated in a prominent town centre location, to bring it back into use represents a clear public benefit.

#### 8.58 **Planning Balance**

A number of public benefits have been advanced by the appellant to support the proposals. Overall, the proposal would provide homes within a settlement. The housing would be a public benefit.

8.59 In economic terms the proposal would provide construction jobs during its build out. These jobs would be transitory and only moderate weight can be afforded to this point. Furthermore, the new properties would result in people living in the town centre and the associated spending by these people in the local economy is also a benefit of the scheme. The property is also vacant and is in need of repairs and renovation. The proposal provides a real prospect that this will happen. With the property being vacant for some time its renovation and occupation is considered to be a planning benefit and one that would result in some improvement to the character of this part of the Conservation Area. This matter should be afforded weight in the balance.

8.60 As identified earlier, majority of the works are considered to have a neutral impact, but the demolition of the toilet block would result in harm and this harm would be less than significant. Public benefits have been identified. For the reasons given above the public benefits are considered to sufficiently outweigh the identified harm to the setting of the Conservation area and adjoining listed buildings. The proposal would, therefore, accord with both Local and national planning policies.

#### 9.0 **CONCLUSION**

9.1 The development is acceptable in principle and complies with Policies COM2 and LE18. In addition the application proposes significant economic benefits. The proposals would result in some less than significant harm to the Conservation Area which are outweighed by the benefits of the scheme which complies with policy. It is further considered that the proposed development would not result in conflict with local and national planning policies relating to public highway network, protected species or amenities of neighbouring properties. The development therefore accords with the Development Plan as a whole and should be approved without delay.

## 10.0 RECOMMENDATION

### PERMISSION subject to:

1. The development hereby permitted shall be begun within three years from the date of this permission.  
Reason: To comply with the provision of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.
2. No development shall take place until samples and details of the materials to be used in the construction of all external surfaces hereby permitted have been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.  
Reason: To ensure the development has a satisfactory external appearance in the interest of visual amenities in accordance with Test Valley Borough Revised Local Plan (2016) Policy E1.
3. Development shall be undertaken and mitigation installed in accordance with the Noise in accordance with the Noise Impact Assessment Ref VA3274.200527.NIA (Venta, May 2020). However the dwellings shall not be occupied until a further sound testing undertaken, and submitted to and approved in writing by the Local Planning Authority, to confirm efficacy and achievement of the standards under Building Regulations and BS8233.  
Reason: To safeguard the amenities of the future occupiers in accordance with Test Valley Borough Revised Local Plan (2016) Policy E8.
4. Development shall be undertaken and mitigation installed in accordance with the measures detailed in the Ecological Assessment (ecosupport, 22<sup>nd</sup> May 2020).  
Reason: To ensure the protection of protected/notable species in accordance with Policy E5 of the Test Valley Revised Local Plan 2016.
5. No development shall take place above DPC level of the development hereby permitted unless and until details of any proposed external plant and equipment have been submitted to and approved in writing by the local planning authority. Any measures required by the local planning authority to reduce noise from the plant or equipment shall be completed prior to the same being brought into use.  
Reason: In the interest of the amenities in the local area in accordance with Test Valley Borough Revised Local Plan (2016) Policy E8.
6. The development hereby approved shall be designed and built to meet Regulation 36 2 (b) requirement of 110 litres/person/day water efficiency set out in part G2 of Building Regulations 2015.  
Reason: In the interests of improving water usage efficiency in accordance with policy E7 of the Test Valley Borough Revised Local Plan 2016.

7. The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers:

7983/01A  
7983/P16  
7983/P31  
7983/P32A  
7983/P27  
7983/P26  
7983/P29  
7983/P28  
7983/P02A

Reason: For the avoidance of doubt and in the interests of proper planning.

8. Full details of all new windows and doors shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of work. The windows and doors shall be installed in accordance with the approved details.

Reason: To protect the character and appearance of the building and conservation area in accordance with Test Valley Borough Revised Local Plan (2016) Policy E9.

9. The rooflights hereby permitted shall be of a 'conservation' style fitted flush to the roof slope.

Reason: To protect the character and appearance of the building and conservation area in accordance with Test Valley Borough Revised Local Plan (2016) Policy E9.

**Notes to applicant:**

1. The development hereby permitted shall be carried out and completed strictly in accordance with the submitted plans, specifications and written particulars for which permission is hereby granted or which are subsequently submitted to, and approved in writing by, the Local Planning Authority and in compliance with any conditions imposed by the Local Planning Authority.
  2. In reaching this decision Test Valley Borough Council (TVBC) has had regard to the National Planning Policy Framework and takes a positive and proactive approach to development proposals focused on solutions. TVBC work with applicants and their agents in a positive and proactive manner offering a pre-application advice service and updating applicants/agents of issues that may arise in dealing with the application and where possible suggesting solutions.
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