

Planning and Regeneration, Gosport Borough Council, Town Hall, Gosport, PO12 1EB

23 December 2021

Dear Sir/Madam,

## REPRESENTATION TO REGULATION 18 CONSULTATION ON THE GOSPORT BOROUGH LOCAL PLAN 2038

We are writing on behalf of our client in response to the consultation on the Regulation 18 Gosport Local Plan.

This representation follows previous discussions had with officers in 2020 regarding site LL014 before the Council made the decision to delay its plan. Prior to the plan being delayed we had believed that any outstanding concerns the Council had regarding the site had been addressed and as such we were surprised to see it had been omitted from the emerging Local Plan.

This letter will discuss the site and why we believe it should be allocated for housing in the Local Plan. Our overarching aim of this representation is to demonstrate to the Council that site LL014 should be reassessed and included in the Local Plan at the next stage.

#### **Housing Provision**

The Regulation 18 Local Plan fails to provide an adequate supply of homes for the Borough.

The Local Plan confirms that the Standard Method figure for the plan is 5,576 new dwellings. Despite this an 'achievable' figure of 3,500 new homes is provided in the Local Plan. Then the table on page 46 of the Plan confirms that it plans for only 3,344 new homes (including the windfall allowance) over the plan period. The plan therefore results in a shortfall of 156 dwellings against the 3,500 dwellings deemed in paragraph 2.3.28 as 'an achievable and realistic housing allocation', and a shortfall of 2,232 housing compared to the 5,576 regarded as a 'the minimum number of homes the Government expects to be planned for' calculated using the Standard Method.

The 3,344 anticipated new homes only accounts for 60% of the minimum number of homes that need to be delivered in the Local Plan; this is a significant shortfall in the required supply of housing in the Borough.

With such a shortfall in housing supply, whether considering the Standard Method figure or the Council's own 'achievable' figure, there is a clear need to allocate land for residential development to enable the delivery of new homes.

#### Paragraph 5.29 of the Sustainability Appraisal (SA) states:

The Borough Council's evidence demonstrates that the standard method figure of 5,576 dwellings is clearly not achievable. It is also clear that given the sites available, the Borough's already built-up nature, and various ecological and other environmental constraints, as well as the need to provide a balanced sustainable community with sufficient employment opportunities, that it will not be possible to provide a sufficient amount of land to accommodate the 5,576 homes set out by the standard method.

#### Paragraph 5.30 goes on to confirm that:

*"Instead, a total of 3,344 dwellings are proposed in the Draft Local Plan for the plan period 2021 to 2038, 197 dwellings per annum over 17 years. This therefore means that the Borough has an unmet need of 2,232 dwellings."* 

Given the Council's sweeping, and somewhat generic, statements in the above paragraphs ruling out any attempt by the Council to deliver the required number of new homes, the Sustainability Appraisal must include proper consideration of the options to deliver the required amount of housing and demonstrate why the option to deliver fewer homes was chosen. As it stands, the SA is flawed as it fails to consider this.

It may well be that the constraints listed above would limit the amount of future new homes that come forward, and that this may lead to an undersupply when compared against the Standard Method. However, the Council have an obligation to make reasonable efforts to provide the 5,576 new homes and that should include the allocation of deliverable land which has been put forward for residential development. As it stands, it would appear there are deliverable sites which have not been included in the draft Local Plan.

The Housing Background Paper seeks to explore this matter further. It identifies that the availability of land in the Borough is a 'key issue'. Paragraph 4.7 of the Paper states that 'when assessing the Policies Map which forms part of the Consultation Draft Gosport Borough Local Plan 2038, it is clearly visible that outside of the identified brownfield regeneration areas already allocated in the Plan for development there is comparatively few sites available in Gosport'. It is also highlighted in paragraph 4.8 why land isn't available such as 'the fact that other than the sites identified in the Local Plan Review there are no significant sites available'.

Paragraph 4.8 sets out the economic and environmental reasons why the supply of residential development land in the Borough is limited, it states:

□ The dense urban nature of the Borough – Gosport is one of the most densely urbanised areas in the South East and has a land area of just 2,530 hectares.

□ The fact that other than the sites identified in the Local Plan Review there are no other significantly sites available. This may be in part due to the land ownership pattern of the Borough which is concentrated in public ownership specifically the MoD (which currently own 21% of the Borough) and consequently the release of land for sizeable residential development is often dependent on the release of MoD land.

□ Significant areas within Environment Agency fluvial floodzone 3 and prone to coastal flooding. Even with this constraint the Borough Council is promoting sites within floodzone

Page 2 of 16

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3 where there are over riding sustainability benefits and it can be demonstrated that the sites can likely be safely protected from flooding in accordance with the NPPF;

□ The presence of internationally important habitats as well as Sites of Special Scientific Interest and numerous sites which support the integrity of the identified features of the internationally important sites;

□ The need to safeguard an appropriate mix of employment sites to provide local employment with the long-term aim of reducing out commuting, which would otherwise deteriorate further leading to additional vehicular congestion;

□ Retention of appropriate levels of open space to serve the population and maintain the quality of the rural landscape and urban townscape

It therefore follows that deliverable, ideally previously developed / brownfield, sites should be identified and allocated for development to try and secure an appropriate supply of homes. Indeed paragraph 3.64 confirms that the Council will be considering any additional sites that come forward through the Reg.18 consultation process. If the Council are doing that, it must be asked why deliverable sites already available to them have not been included in the plan at this stage.

We discuss site LL014 later in this document but is a prime example. It is a redundant brownfield site without any viable use in its existing state. It is Suitable, Available and Achievable as required in the SHLAA and SA methodology.

Paragraph 4.15 of the conclusion indicates that 'the Borough Council will continue to contribute towards the overall requirements by taking a positive approach to new residential development'. We believe that the Council have not applied this 'positive approach' when assessing site L0014 and by excluding it from allocation in the Local Plan, have not contributed towards the overall housing requirements.

The Council are making the case that they are limited in what they can do, partly due to a lack of deliverable sites for residential development. By failing to allocate deliverable sites they are undermining their own arguments set out in the consultation documentation.

#### Site LL014 (The Towers, Forton Road)

#### Site Promotion History

We submitted a request for pre-application advice to the Council's Development Control team in late 2019, alongside a submission to the Planning Policy team asking that the site be considered for allocation in the emerging plan. The proposal included the demolition of the existing building and the erection of a six storey tiered block of flats with parking on the ground floor and communal outdoor amenity space for residents on the roof.

A written response was received from the development control team on 3 February 2020. This response highlighted several areas of concern which can broadly be summarised as Loss of a Community Facility, Highways & Parking, and Design (most notable Scale/Massing). Considerable work was undertaken by the project team to address these comments and in September 2020 information was submitted to the planning policy team to address and overcome these concerns.

The additional information comprised a Facility Needs Assessment & Marketing Report, Highways Note and Drawing Pack. This information is enclosed with this letter for reference.

#### Strategic Housing Land Availability Assessment (SHLAA) Methodology

The SHLAA provides key evidence to inform polices in the Local Plan. In particular, it assesses identified sites put forward in the Call for Sites against a methodology to determine they are suitable to be allocated in the Local Plan for residential development. We provide commentary on the SHLAA in relation to site LL014 below.

#### <u>Errors</u>

The SHLAA Proforma for the site includes several errors:

- The site has been mapped wrong, we would urge you to review our previous submissions.
- The document states that the existing land use is as a '*cinema and some residential*'. This is incorrect, the site is currently vacant and being marketed. Its most recent use was a Bingo Hall and has not been used as a cinema since 1968. A more appropriate use to state would be "Vacant building, former Bingo Hall".

#### Suitability

The Council's SHLAA methodology states:

#### Suitable

- 5.15 To be **suitable** for development, the appropriateness of residential development was assessed taking into account the site's location, physical constraints and potential impacts, and local and national planning policies.
  - The suitability of a location for residential development was considered, accounting for the site's local context, policy considerations and other constraints.
  - Physical constraints to development were addressed and only when development was assessed as unrealistic was the site discounted. The potential impacts of developing a site on the immediate surroundings and wider area were assessed and attempts to address these made.
  - Where a site was contrary to local planning policy, the need for a designation or policy requirement was reviewed.
  - Where a site was considered unsuitable, availability and achievability were not assessed.

The site has been given an amber rating for suitability i.e. 'site may be acceptable, subject to further study, infrastructure or mitigation works, or policy requirements'.

It is noted in the SHLAA that 'the site has the potential to accommodate residential development' if it suitably addresses the constraints. It states that the constraints can be dealt with through the development management process. We agree and believe that they would be dealt with through

Page 4 of 16

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the development control process just as the constraints on any allocated site would be. This is not a valid reason to not allocate a site for development.

The SHLAA states that the site has a community, culture or leisure use which makes it less suitable for residential development. This is contradictory to the SA which states that there is not a community, culture or leisure use on the site. It also indicates that *'the site has operated as a Bingo Hall and is considered a community facility and remains protected as such. Appropriate evidence in line with Local Plan policy will be required if planning permission is sought for redevelopment'.* We have previously submitted to the Council a Facility Needs Assessment & Marketing Report on the 16<sup>th</sup> September 2020 which confirms that:

'recent trading and market conditions nationally and locally have led to the existing use of the bingo hall being no longer required due to lack of demand. It is also clear from the marketing exercise that the prospect of it being used for other community/leisure uses is highly unlikely considering the costs involved in repairing, maintaining and/or adapting the premises for an alternative community use'.

The site is no longer viable for a community or leisure use, we have undertaken the marketing exercise to demonstrate that the existing building is not suitable for other community uses, and as a result this should not be a barrier to allocation.

The SHLAA states that the site has the locally listed Trafalgar Square No. 1 located within close proximity. This is correct but we have previously submitted indicative designs for the site which show how an acceptable scheme could be accommodated. If special mention of this is needed it could be referred to in the allocation policy. It is also noted that the redevelopment of LL014 may assist with the long term viability of the locally listed pub, bringing more customers to it.

The existing building's façade would be incorporated into the development. Appropriate and safe access can be provided for both vehicles and pedestrians, alongside appropriate levels of car parking. We have demonstrated that the redevelopment of the site would *'ensure that any undesignated heritage/design features on the site are fully considered'* and *'appropriate safe access can be provided'* as required in the concluding comments of the SHLAA assessment.

There is no logical reason why the site has not been assessed as 'green', and even with an 'amber' assessment, there is no reason why the site should not be considered to be suitable for residential development.

#### <u>Availability</u>

The Council's SHLAA provides the site with a green rating for availability which indicates that it is available for residential development. We consider that this is correct and will not comment further.

Page 5 of 16

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#### <u>Achievable</u>

The Council's SHLAA methodology states:

#### Achievable

- 5.17 **Achievable** sites have a reasonable prospect of being viable to develop at a particular point in time. Any identified barriers to development have a likely prospect of being overcome.
  - Using their own experience and similar case study examples in the region officers made a pragmatic assessment as to whether sites could realistically be developed within the plan period. These judgements are based on the best information available at the time.
  - Where abnormal development costs were identified, the potential viability concerns and funding sources required to address these were considered.
  - The infrastructure requirements of sites and broad locations were assessed and infrastructure providers consulted. These requirements and the responses received from the infrastructure providers are detailed in the Infrastructure Assessment Report (IAR) (2021).
  - The Council may be undertaking a 'Whole Plan' viability report later in the plan process and this may further inform the findings.

The SHLAA has given the site an amber rating for achievability suggesting that the 'site may be acceptable, subject to further study, infrastructure or mitigation works, or policy requirements'.

The Council have deemed that there would be 'a realistic prospect that the site would come forward for development within the plan period', however this issue has been given an amber rating as further evidence would be required through the development management process. As set out above any areas of further concern could be set out through policy requirements, providing the landowner and decision-maker with distinct guidance for determining any subsequent application.

The Council have also determined that decontamination and site clearance costs could impact achievability. We are unsure on what basis this has been considered as we consider the site to be achievable as set out before.

There is a reasonable prospect of the site coming forward, and it is anticipated that planning application will be made in early 2022.

Development on the site is achievable, there are not considered to be any abnormal costs that would hinder the development and should be given a green rating.

#### Is the site developable?

As demonstrated above, SHLAA site LL014 is Suitable, Available and Achievable. This is confirmed by officers in the SHLAA, and we see no logical explanation as to why the site falls into the '*Discounted SHLAA sites*' category when the document accepts that any matters still to be

resolved can be dealt with at the detailed design stage and/or through some policy criteria. We believe that policy criteria would be more effective than requiring the development management process to deal with matters speculatively. Policy criteria specific to the site would result in an overall higher quality proposal which aligns with local aspirations better.

On a side, we note that site LL014 is the only site in the '*Developable SHLAA sites*' category which has been assessed as being 'green' or 'amber' (although we dispute the amber assessments) in relation to all three assessment criteria (those being Suitable, Available and Achievable). Every other site in this section has been assessed as being 'currently not suitable for allocation' in relation to at least one of the criteria. The implications of this being that site LL014 has been incorrectly categorised into the '*Discounted SHLAA Sites*' and should instead feature in the '*Developable SHLAA Sites*'.

Whilst we disagree with the Council's assessment of the site, even the Council's assessment indicates that the site should be allocated for residential development and as such we request that it be included in any future iteration of the plan.

#### Sustainability Appraisal (SA)

The SA considers Site LL014. It concludes that the preferred option for the site is option 2 to '*retain white land*'. The site has been assessed against the 27 Sustainability Appraisal Objectives set out in the SA. Overall, the site ranked as neutral/not applicable or uncertain to all of the objectives.

We agree with the Council's assessment that 'developing the site for residential would have a number of positive effects'. These include but are not limited to, helping reduce the identified expected shortfall in housing in the Local Plan, retain the historic character of the site, contribute to appearance of the local area, and encourage the use of more sustainable modes of transport.

The SA also assesses the site against the same criteria as the SHLAA however there are some discrepancies between the two assessments. The SA assessment states that the site does not have a community, culture or leisure use however the SHLAA assessment indicates that it does. There is also a discrepancy in assessing whether there are any existing tenancies or operations on the site, the SA stating that there are however the SHLAA states that there are not. The SA also comments on this indicating that the *'bingo facility is still open and there are some residential properties on the site'*, this is incorrect as the bingo hall is vacant and there are no residential properties on the site.

We do have a number of concerns with the assessment of the site contained within the SA and provide annotations on the assessment on the following pages as we believe the site, and importantly Option 1, should be assessed.

Page 7 of 16

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	The effect	s over time:	
++ major positive + positiv	ve <b>o</b> neutral	? uncertain	- negative major negative
The Towers, Forton Road			
Sustainability Theme	20	٤ ٥	Comments: consideration of likelihood of
Sustainability Appraisal Objective	Option 1: Al residential	Option 2: I white land	effect, spatial scale, temporary/permanent
Decision Making Criteria	on 1. enti	n 2	effects, short/medium/long term effects and cumulative effects
	: Allocate al	Option 2: Retain as white land	
Climate Change			
SA1 – To address climate change issues through	ugh reducing gr	eenhouse gas	emissions.
1. Will it help to reduce carbon dioxide	0	0	Option 1 could introduce new emissions. The
and other greenhouse gas emissions?	+		overall effect is assessed as neutral as there may also be opportunities to reduce emissions.
2. Will it support the transition to net zero carbon by 2050?	0	0	Both options are assessed as neutral. Option 1 would provide opportunities to support net
2010 5010011 by 20001			zero carbon by 2050, however option 2 would
			see no Local Plan allocation on the site which
	+	-	could also help to support net zero by not
2 Will it deliver energy officient			introducing any new carbon emissions.
3. Will it deliver energy efficient buildings?	+	0	Option 1 could see new dwellings built to a high standard of energy efficiency.
4. Will it support the charging of plug-in	0	-	The site currently has no provision for electric
and other ultra-low emission vehicles?			vehicle charging. Option 1 would provide the
			potential to incorporate facilities into new
			dwellings however the development may not meet the threshold for this so is assessed as
	<b>T</b>		neutral at this stage.
Overall effects identified SA1	0 +	0 -	
Transport and Accessibility	-		Second Second
SA2 - To reduce the need to travel and to red	duce the effects	s of traffic on	local communities.
1. Will it reduce traffic volumes and congestion?	•?+	0	For option 1 new dwellings on the site could lead to increased traffic volumes and
2. Will it reduce road traffic accidents?	o?	0	congestion, road accidents, and pollution
3. Will there be an increase in traffic	0?	0	however the effects are considered to be
related air and noise pollution?			minimal and of limited effect to the overall road network. It is also uncertain whether all
			occupiers would have vehicles. Option 2 is a
			continuation of the existing situation and
			assessed as neutral.
Overall effects identified SA2	o?	o	
SA3 - To facilitate modal transfer away from public transport.	use of the priva	ate car to othe	er forms of travel including walking, cycling and
1. Will it increase the proportion of	o?	0	New dwellings on the site could result in
journeys using modes other than the			additional car use however this is not certain as
private car?			occupiers may use other modes. The site is also located in proximity to a neighbourhood centre
			which will reduce the need to travel for certain
	+		provisions.
2. Will it provide for high quality walking	+	o	Option 1 with new dwellings provides the
and cycling networks and supporting			opportunity to provide suitable cycle provision.

Page 603 of 640

Sustainability Appraisal Annex A | SA of the other sites from the Call for Sites

++ major positive + posit		cts over time	e. n  - negative  major negative
The Towers, Forton Road			
Sustainability Theme	2.0	5 0	Comments: consideration of likelihood of
Sustainability Appraisal Objective	ptic	hite	effect, spatial scale, temporary/permanent
Decision Making Criteria	Dption 1: residentia	Option 2: I white land	effects, short/medium/long term effects and cumulative effects
	Option 1: Allocate residential	Option 2: Retain as white land	cummative effects
acilities such as cycle parking?			
Overall effects identified SA3	0 🕂	0	
	quality services	s and facilities	including health, transport, education, training,
employment and leisure opportunities.	- 1-	- 1-	
1. Will it improve access to local services?	n/a	n/a	
2. Will it make access easier for those without a car?	n/a	n/a	
3. Will it make access easier for disabled and or elderly people?	n/a	n/a	
Overall effects identified SA4	n/a	n/a	
Community Activity and Neighbourhoo	ods		
SA5 - To provide opportunities for commun			he quality of where people live.
<ol> <li>Will it provide opportunities for engagement in community activities?</li> </ol>	n/a	n/a	
2. Will it improve neighbourhoods as places to live?	+	O	By implementing option 1 and developing the site there will be an improvement of the built environment which could improve the neighbourhood as a place to live.
Overall effects identified SA5	+	0	
Crime and Disorder			
SA6 - To reduce crime and disorder			
L. Will it reduce actual levels of crime and disorder?	n/a	n/a	
Overall effects identified SA6	n/a	n/a	
Poverty and Deprivation			and the second
SA7 - To reduce poverty and social exclusion region.	n and close the	gap between	Gosport and other areas in the South East
I. Will it reduce poverty and social exclusion in those areas most affected?	+	0	Option 1 could see affordable housing built as part of the mix of new dwellings on the site.
Overall effects identified SA7	+	0	
Health and Well-being			
	of the population	on, reduce ine	equalities in health and improve health facilities.
L. Will it reduce health inequalities in hose areas most affected?	n/a	n/a	
2. Will it enable and support healthy ifestyles?	+	0	New high quality dwellings will improve the Borough's overall housing stock. This could help to support healthy lifestyles.
3. Will it improve access to health facilities?	n/a	n/a	
Overall effects identified SA8	+	0	
Housing			
SA9 - To ensure that everyone has the oppo	rtunity to live i	in a decent an	d affordable home.

a dense of the second second		ts over time	
	ve <b>o</b> neutral	? uncertai	n - negative major negative
The Towers, Forton Road		-	
Sustainability Theme	Opt	wh Op	Comments: consideration of likelihood of effect, spatial scale, temporary/permanent
Sustainability Appraisal Objective	Option 1: residentia	Option 2:   white land	effects, short/medium/long term effects and
Decision Making Criteria	Option 1; Allocate residential	Option 2: Retain as white land	cumulative effects
1. Will it reduce homelessness?	+?	0	Option 1 would provide housing which will have
2. Will it increase the range and affordability of housing for different groups in the community?	+	0	positive effects for increasing the range and affordability of housing and the number of decent homes. New housing also has potential
3. Will it increase the number of decent homes?	+	0	to contribute towards reducing homelessness.
Overall effects identified SA9	+	o	
Education and Skills			
SA10 - To raise educational achievement and and remain in work.	d develop the c	opportunities	for everyone to acquire the skills needed to find
<ol> <li>Will it improve the qualifications and skills of young people?</li> </ol>	n/a	n/a	
2. Will it improve the qualifications and skills of the population overall?	n/a	n/a	
Overall effects identified SA10	n/a	n/a	
Employment			
SA11 - To provide opportunities for resident potential for people to use public transport,			out-commute and thereby provide greater
1. Will it reduce out-commuting from		o?	While option 2 assumes nothing would happen
he Borough?	• ?		on the site at this stage, as the previous
2. Will it improve accessibility to work by oublic transport, walking and cycling?	•	0	business relocated to a new premises, there is potential that the site could be reoccupied for employment/ community uses could potentially reduce out-commuting from the Borough for work.
Overall effects identified SA11	0 🕂	o	
SA12 - To ensure high and stable levels of er Borough.	nployment so e	everyone can	benefit from the economic growth of the
1. Will it reduce overall unemployment?	n/a	n/a	
2. Will it reduce long-term unemployment?	n/a	n/a	
3. Will it provide job opportunities for those most in need of employment?	n/a	n/a	
4. Will it help to improve average earnings?	n/a	n/a	
Overall effects identified SA12	n/a	n/a	
<b>Economy</b> SA13 - To increase investment in Gosport's ε	aconomy to fac	vilitate the cur	tainable regeneration of the Borough
1. Will it make more effective use of previously developed land?		o O	Redeveloping the site for housing is considered to be an effective use of PDL. However,
2. Will it improve business development and enhance competitiveness?	0	0	retaining the site could see it developed for other purposes in the future.
3. Will it improve the resilience of	0 🕇	0	

++ major positive + positi		ts over time ? uncertai	n - negative major negative
The Towers, Forton Road			
Sustainability Theme	20	εo	Comments: consideration of likelihood of
Sustainability Appraisal Objective Decision Making Criteria	Option 1: Allocate residential	Option 2: Retain as white land	effect, spatial scale, temporary/permanent effects, short/medium/long term effects and cumulative effects
husiness and the approximul			
business and the economy? 4. Will it promote growth in key sectors and clusters?	0	0	
5. Will it make land and property available for business development? Overall effects identified <b>SA13</b>	° _	° ?	
SA14 - To encourage the development of a		0 nable tourism	sector
<ol> <li>Will it positively contribute to the local tourism industry and improve the image of Gosport as a destination?</li> </ol>	n/a ++	n/a 	
Overall effects identified SA14	n a	n/a 💶	
Towns and Neighbourhood Centres			and the second
<ul> <li>SA15 - To ensure the vitality and viability of</li> <li>1. Will it improve the accessibility to, and</li> <li>quality of, main town centre uses (as</li> <li>defined in NPPF Annex 2)?</li> <li>2. Will it improve the vitality and viability</li> <li>of centres?</li> </ul>	o + +	0 0	Option 1 could improve the vitality and viability of local centres by introducing additional customers.
Overall effects identified SA15	0 🕇	0	
Leisure			
SA16 - To improve the quality and accessib	ility of leisure of	oportunities w	vithin the Borough.
1. Will it improve the range of sporting facilities in the Borough?	n/a	n/a	
Overall effects identified SA16	n/a	n/a	
		the quality of	its public areas and green spaces including the
provision of good access to the coast and h 1. Will it protect or enhance the Borough's network of greenspace?	o	o	
2. Will it protect or enhance the quality of the Borough's coast and harbour frontage and maintain or improve public access?	0	O	
Overall effects identified SA17	0	0	
Biodiversity and Geodiversity			
SA18 - To conserve and enhance the Borou	gh's biodiversity	y and geologic	
<ol> <li>Will it result in a biodiversity net gain?</li> </ol>	+	0	Option 1 will be required to secure a biodiversity net gain. The site currently has limited biodiversity and there are significant opportunities for net gains on the site.
<ol> <li>Will it enhance biodiversity through the restoration and creation of well- connected multifunctional green infrastructure?</li> </ol>	n/a	n/a	

++ maior positive + posi		cts over time	e: n  - negative  major negative
The Towers, Forton Road			37.112
Sustainability Theme	20	٤٥	Comments: consideration of likelihood of
Sustainability Appraisal Objective Decision Making Criteria	Option 1: Allocate residential	Option 2: Retain as white land	effect, spatial scale, temporary/permanent effects, short/medium/long term effects and cumulative effects
<ol> <li>Will it maintain and enhance sites designated for their nature conservation nterest?</li> </ol>	?	?	The impact created by option 1 is uncertain.
<ol> <li>Will it conserve and enhance local nabitats and species diversity, and avoid narm to protected species?</li> </ol>	?	?	-
Overall effects identified SA18	?	o?	
Heritage and Design			
A19 - To protect and enhance the historic	environment.		
L. Will it protect and enhance the historic environment?	n/a	n/a	
2. Will it improve the condition of any neritage asset identified as at risk?	n/a	n/a	
Overall effects identified SA19	n/a	n/a	
5A20 - To ensure that there is a high qualit	y townscape inc	orporating go	ood design principles for buildings and
surrounding spaces. L. Will the design enhance the quality of he townscape?	+?		Option 1 should see dwellings designed to a high standard which would enhance the quality of the townscape. However there is some uncertainty at this early stage.
Overall effects identified SA20	+?	-	
Air Quality			
A21 - To reduce air pollution and ensure a			ve.
L. Will it improve air quality?	n/a	n/a	1
Dverall effects identified SA21	n/a	n/a	
Use of Energy Resources			
L. Will it reduce emissions of greenhouse		o energy gener	rated from renewable sources in the Borough. The overall effects are considered to be
gases by reducing energy consumption? 2. Will it lead to an increased proportion	+++	0	neutral. Option 1 could lead to reductions or increase in greenhouse gases from energy
of energy needs being met from renewable resources?	++	U	consumption depending on where the energy is sourced from.
Overall effects identified SA22	0++	0	
Jse of Land Resources			and the second sec
A23 - To improve efficiency in land use th	rough the re-us	e of previousl	y developed land and existing buildings.
I. Will it re-use previously developed and?	+	0?	Option 1 would help to re-use a site which has been unused. Option 2 is assessed as having
2. Will it remediate contaminated land?	+	ο?	neutral/uncertain effects at this stage as the option does not prevent development but is also not specifically allocating development on the site.
Overall effects identified SA23	+	o?	

		ts over time		
The Towers, Forton Road	e <b>o</b> neutral	? uncertai	n - negative major negative	
Sustainability Theme	2.0	5 0	Comments: consideration of likelihood of	
Sustainability Appraisal Objective	Option 1: residentia	Option 2:   white lanc	effect, spatial scale, temporary/permanent	
	ent	e la	effects, short/medium/long term effects and	
Decision Making Criteria	Option 2: Retain as white land Option 1: Allocate residential		cumulative effects	
SA24 - To maintain and improve the water qu	ality of the Bo	rough.		
1. Will it improve compliance with the Water Framework Directive?	?	?	It is uncertain at this stage.	
Overall effects identified SA24	?	?		
SA25 - To reduce the risk of flooding and the	resulting detri	ment to pub	lic well-being, the economy and the environment	
1. Will it minimise the risk of flooding from all sources to people and property?	? +	o	It is uncertain at this stage as to whether Option 1 will result in an increased risk of surface water run off within the site.	
2. Will development be avoided in flood risk areas?	0	o	The site is not in a flood zone.	
3. Can the site be made safe taking into account predicted sea level rise?	0	0	The site is not predicted to be effected by sea level rise.	
Overall effects identified SA25	0	0		
SA26 - To provide for sustainable sources of v	vater supply.			
1. Will it reduce water consumption?	-	0	Option 1 could increase water consumption on the site and cumulatively within the Borough.	
Overall effects identified SA26		0		
Natural Resources and Waste Managen	nent			
SA27 - To reduce waste generation and dispo management of waste.		ve the sustain	nable consumption of natural resources and	
1. Will it lead to reduced consumption of materials and resources?	24	0	Building new homes on the site would increase the use of resources and result in more	
2. Will it reduce household waste?	-	0	household waste, both of which will result in	
3. Will it increase recycling?	0	O	negative effects. There will be opportunities fo recycling with Option 1 so this is assessed as neutral.	
Overall effects identified SA27		0		

Sustainability Appraisal Annex A | SA of the other sites from the Call for Sites

Page 608 of 640

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Accordingly, we believe that if assessed correctly, Option 1 (which is to allocate the site) scores much better against the sustainability objectives than Option 2, which is in essence the do nothing option.

#### Local Plan Housing Requirement

As mentioned earlier, 3,334 houses are anticipated to be supplied throughout the plan period, this represents a shortfall of 2,232 houses in comparison with the minimum of 5,576 expected by the Government. Given this shortfall in housing, we believe that it would be in the Council's best interest to reassess the site and reconsider it for allocation within the Local Plan, particularly as it has been previously demonstrated that a proposal would appropriately address the site's physical constraints.

Bringing 24 units forward on the site would provide a meaningful contribution to reducing this shortfall, redeveloping a vacant site that is not viable in its current use.

#### Gosport Townscape Assessment

The Gosport Townscape Assessment is a supporting document that forms part of the evidence base to inform policy in the Local Plan. It provides details regarding heritage features specific to individual locations and for the broader area.

When discussing Forton, paragraph 2.25 states that the streetscape *'is a diverse mix of mostly mid-19<sup>th</sup> Century small shops and houses with some modern infill, including three storey flats'*. The proposal is for a part 3 and part 4 storey building with suitable materials that would help the building to blend into the streetscape. The SA and SHLAA for the Regulation 18 Local Plan state that the site has a capacity for 28 flats however the proposal is for 24 flats which is considered to be more in keeping with the local area and in accordance with guidance such as that within the Gosport Townscape Assessment.

#### Design Guidance: Supplementary Planning Document (SPD)

The Design Guidance has already been adopted by the Council and applies to the development management process. It provides details surrounding design related considerations such as access, parking and services and architectural and design detail. It also forms part of the evidence base for the Regulation 18 Local Plan.

Key Design Principle 10 (Access around the site) states that: 'Access (such as roads, footpaths, cycle routes) within the site should be safe and convenient to use, both should not be dominated by roads'. The scheme submitted in September 2020 addresses the Council's comments during the pre-application stage and demonstrates that safe and convenient access can be achieved on the site to Lees Lane, providing appropriate space for vehicles to enter and exit the car park with sufficient views to the east and west. The previous scheme therefore already demonstrates that it complies with Key Design Principle 10.

Key Design Principle 12 (Waste, Recycling and Cycle Storage) states that 'Waste and recycling and cycle storage should be safe, accessible and convenient for the intended users and properly integrated into the built design. Cycle storage should also be secure'. The scheme submitted alongside the previous representation provides a 44m<sup>2</sup> bin store with a mixture of 14 refuse and recycling bins. The car park also provides 24 short stay cycle parking spaces and 45 permanent

cycle storage spaces. The previous scheme therefore already demonstrates that it complies with Key Design Principle 12.

Key Design Principle 13 (Design of Buildings and Materials) highlights that '*The scale, form and design of elevations and external materials should respond positively to the defining characteristics of an area. Where this is absent, design and materials should help to create a new positive and distinct character'. The pre-application response from the Council stated that 28 flats would constitute overdevelopment on the site. Despite this, the SA and SHLAA submitted alongside the Regulation 18 Local Plan state that the site has the capacity for 28 flats. The scheme submitted in September 2020 sought to provide 24 flats. Furthermore, the pre-application response and the Gosport Townscape Assessment highlight that there are 3 storey buildings in the area. The introduction of a part 3 and part 4 storey building would therefore mostly comply with this, although the design of the building would help it to blend into the setting using red and brown colours in keeping with the other dwellings in the area. In addition, the historic façade of the existing bingo hall would be retained, thus respecting the site's history and providing a distinctive feature that contributes to the character of the building. The scale, form and materials used for the development would therefore be appropriate when considering the character of the area and therefore we consider that the previous scheme complements Key Design Principle 13.* 

Key Design Principle 14 (Continuity and Enclosure of Space) indicates that '*Buildings should be designed to enclose space and have active frontages onto the public realm with particular attention being paid to entrances and corners*'. The building proposed in the previous scheme is almost triangular in shape, making efficient use of the space available. Due to the nature of the site, all elevations have active frontages onto the public realm with the main pedestrian entrance fronting Forton Road. We therefore consider that the scheme is in accordance with Key Design Principle 14.

The development proposed in the details submitted to the Council in September 2020 would therefore be supported by the Design Guidance SPD which has been used for the evidence base as part of the production of the Regulation 18 Local Plan. The proposal therefore would comply with generic guidance however we believe that more specific planning policy, included within a site allocation, would enable us to further improve the design.

#### **Concluding Comments**

The Regulation 18 Local Plan contains a standard methodology for housing which presents a minimum housing delivery of 5,576 in the plan period. The Council highlight that a figure of 3,500 homes would be a more achievable figure however it is only anticipated that 3,344 houses would be delivered. This represents a significant shortfall of 2,232 houses in comparison to the figure of 5,576. Allocating site LL014 for housing in the Local Plan would contribute to reducing this critical shortfall.

Despite working closely with the Council at pre-application in February 2020 and the submission of details of an appropriate scheme in September 2020, site LL014 has not been allocated in the Local Plan for housing.

We disagree with how the SHLAA and SA have assessed the site, particularly that its suitability and achievability has been given an amber rating, we have demonstrated that in fact it should have been given a green rating for both categories taking into account of the information already

submitted. We also believe that Option 1 in the SA assessment would create more positive impacts than the Sustainability Appraisal currently give it credit for.

The SHLAA and SA state that the site should be dealt with via the development management process but we disagree, and believe that a site specific allocation policy would provide the Council with the ability to provide more relevant guidance, leading to an overall higher quality scheme.

The proposal submitted in September 2020 addresses the comments raised by the Council at the pre-application stage in February 2020 and also concerns provided within the SHLAA and SA, particularly involving highways and access, heritage and the loss of a community or leisure asset. The Council have also recognised that 'developing the site for residential would have a number of positive effects'. We have also established that the proposal would comply with the Gosport Townscape Assessment and the Design Guide SPD and opposes the notion that there are no other suitable sites available, indicated in the Housing Background Paper which all contribute to the evidence base used for the Regulation 18 Local Plan.

In summary, we believe that site L0014 should be allocated for residential development within the Local Plan and that a residential scheme on this scheme will provide benefits to the local area, and create a positive streetscape on a key road into Gosport. The Local Plan indicates that there will be a significant shortfall in supply of housing in comparison to the minimum expected in the Standard Methodology and the allocation of site L0014 would provide a meaningful contribution to reducing this shortfall.

We therefore request that the site LL014 be allocated for residential development in the next iteration of the plan. Whilst we disagree, the Council appear to believe there are unresolved matters to address before the site can be allocated, and we would welcome dialogue with officers in early 2022 to ensure that these matters are addressed to the Council's satisfaction before the next iteration of the plan is published.

If you have any queries, please do not hesitate to contact me.

Yours sincerely,



Andrew Metcalfe Director | MPlan MRTPI

Encs. Submission made to Council on 16 September 2020, including Facility Needs Assessment & Marketing Report, Highways Note and Drawing Pack.

Page 16 of 16

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Planning and Regeneration Gosport Borough Council Town Hall High Street Gosport PO12 1EB

16 September 2020

Dear Sir/Madam,

#### 4-5 THE TOWERS, FORTON ROAD – ADDITIONAL IMFORMATION

Further to our letter of 7 August 2020, please find enclosed additional information relating to 4-5 The Towers, Forton Road, which we are promoting on behalf of the landowner as a suitable site for allocation in the emerging Local Plan.

As you are aware, we submitted a request for pre-application advice in 2019 and a written response was received from the development control team on 3 February 2020. This response highlighted several areas of concern which can broadly be summarised as Loss of a Community Facility, Highways & Parking, and Design (most notable Scale/Massing). Considerable work has been undertaken by the project team since receipt of this pre-application response to overcome these concerns and this is set out in the additional information enclosed with this letter.

The additional information comprises a Facility Needs Assessment & Marketing Report, Highways Note and Drawing Pack. Each of these documents are considered below.

#### Facility Needs Assessment & Marketing Report

The site's last active use was as a Bingo Hall and as such was considered by the Council to comprise a community facility. Policy LP32 of the current Gosport Borough Local Plan seeks to resist the loss of such facilities unless the building is surplus to requirements for that particular purpose and it can be demonstrated that there are no other viable community, cultural, sports, recreation or built leisure uses for the premises. Therefore, in accordance with Policy LP32, a Facility Needs Assessment has been undertaken, including a 6 month marketing exercise, to try to secure a community, cultural, sport or built leisure use.

The results of the assessment demonstrate that recent trading and market conditions nationally and locally have led to the existing use of the bingo hall being no longer required due to lack of demand. It is also clear from the marketing exercise that the prospect of it being used for other community/leisure uses is unlikely considering the costs involved in repairing, maintaining and/or adapting the premises. There has been no suitable offer put forward during the 6-month marketing period which would secure the site for its existing use, as a bingo hall or as an alternative community/leisure use. Policy LP32 of the current Local Plan is therefore satisfied and should not

prevent the site being redeveloped for an alternative use.

#### Highways Note

Following comments received, primarily regarding the proposed access and quantum of parking, the design team have reviewed these elements, alongside other matters such as the number of units to be provided.

In direct response to the concerns raised, the proposed access has been widened and the number of proposed flats reduced to 24. 15 parking spaces are now provided alongside ample cycle parking and bin storage.

Pre-application discussions with Hampshire County Council (as Highway Authority) confirmed that:

- The site is well connected for pedestrians and has good pedestrian links towards local services and amenities, as well as Gosport town centre.
- The site has good access to bus services with a bus stop adjacent to the site providing access to Gosport town centre.
- Some constructive comments have been received regarding the proposed access which would be addressed during detailed design work, in preparation for a planning application.
- HCC would raise no objection to the proposed level of parking.

The Highways Note included in this submission includes a covering note, Transport Scoping Report (2020) and the pre-application response from Hampshire County Council.

#### **Drawing Pack**

In response to comments regarding scale, bulk and massing, the project team have gone back to basics and fundamentally redesigned the scheme. This has produced a much improved and far more in-keeping and sympathetic proposal when set against the site's environs. The drawing pack includes the following drawings:

- 20013 Diagram 001, Sketch Arial View
- 20013-SK-010, Ground Floor Area Plan
- 20013-SK-011, First Floor Area Plan
- 20013-SK-012, Second Floor Area Plan
- 20013-SK-013, Third Floor Area Plan
- 20013-SK-014, Fourth Floor Area Plan
- 20013-SK-021, First Floor Layout Plan

The key design changes are highlighted below:

- The scheme has been reduced to 24 flats and is now five storeys high instead of six. There are x7 flats on the 1<sup>st</sup> & 2<sup>nd</sup> floors, x6 flats on the 3<sup>rd</sup> floor and x4 flats on the 4<sup>th</sup> floor. There are 5no. 1-bedroom 2-person flats and 19no 2-bedroom 4-person flats,
- The ground floor can accommodate 15no. parking spaces, 69no. cycle parking spaces and 10no. 1100litre bin stores in line with local standards/requirements.
- The ground, 1<sup>st</sup> & 2<sup>nd</sup> floors will be a brick clad urban block, with the brickwork matching the locally listed Saint John the Evangelist Church located 50m southeast of the site.

Page 2 of 3

- The fenestration opening to the ground and 1<sup>st</sup> floor will be set within a double height brick opening, to help integrate the parking at ground floor and to give a better overall proportion to the brick façade.
- The original entrance façade to the bingo hall would be integrated into the scheme as a key feature, with the new entrance utilising part of the original entrance.
- The 3<sup>rd</sup> and 4<sup>th</sup> stories will be metal clad and set back, with pitched metal roofs and gable ends to the south and northeast elevations, helping to reduce the overall mass of the building with these floors being read within the roof zone.
- The Southeast corner is set back with a series of open balconies to the 3<sup>rd</sup> and 4<sup>th</sup> floors, helping to reduce the mass at a prominent corner of the scheme. A further ground floor set back at this corner enables planting to be introduced and enliven the street scene.
- Internally the layout provides a high standard of accommodation for occupants with spacious flats, the inclusion of balconies and fenestration that allows maximum daylight.

#### Conclusion

The current building is surplus to requirements as a Bingo Hall and there is no potential future for the site as a community, cultural or leisure use. The principle of the loss of the community facility is acceptable in accordance with the current Local Plan Policy LP32.

The enclosed documents demonstrate that the site can deliver 24 flats in a way that responds to the site's context. The proposed 24 flats would be a great addition to Gosport in this prominent location, close to local shops and services. In addition, it has been demonstrated that the quantum of parking (for both cars and cycles) proposed is appropriate.

We hope that you find the enclosed additional information helpful and you agree that the redevelopment of the site will make a valuable contribution towards the rejuvenation of this part of Gosport. We do not believe that there are any outstanding material matters to consider which would prevent the allocation of this site in the emerging Local Plan to help meet the identified housing need in this area.

Should you have any queries or would like to request further information please do not hesitate to contact us.

Yours sincerely,

Andrew Metcalfe Director | MPIan MRTPI

Encs.

Facility Needs Assessment & Marketing Report
 Highways Note
 Drawing Pack

Page 3 of 3

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# 4-5 The Towers, Forton Road, Gosport

Facility Needs Assessment & Marketing Report

Published: 16 September 2020 Prepared for: Peter Arnett Leisure

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# **Document Information**

### About

This document has been prepared for Peter Arnett Leisure by Squires Planning. The report sets out the results of a needs assessment for its most recent use as a bingo hall and also a six month period of marketing the site at 4-5 The Towers, Forton Road, Gosport.

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### **Revision History**

Revision	Revision date	Details	Authorised Release
1	4 September 2020	Draft for internal review	Andrew Metcalfe (Director)
2	8 September 2020	Draft for external review	Andrew Metcalfe (Director)
3	10 September 2020	Draft for external review	Andrew Metcalfe (Director)
4	16 September 2020	Final (issued)	Andrew Metcalfe (Director)

### Graphics & Mapping

This document may include graphics and mapping which display data provided from third parties including the government. Every endeavor has been made to ensure that the most up to date available data has been used to create such mapping however it should be noted that such data is updated frequently and as a result updated data may be available direct from the relevant provider.

# Contents

1.	Introduction	4
	Background	4
2.	Need for existing use	6
	National Trend	
	Site Attendance Data	7
	Site Trading Data	
	Pre-marketing efforts to maintain existing use	
3.	Sale of site for community use	10
	Activity Log	
	Commentary	
4.	Conclusion	
		S
Ар	opendix A – Agreed Marketing Strategy	
Ар	opendix B – Sales Particulars	
Ар	opendix C – Online Rightmove Listing	
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# 1. Introduction

- 1.1. This report has been prepared by Squires Planning in conjunction with Tony Lewis Surveyors Ltd for Peter Arnett Leisure, the landowner of 4 -5 The Towers, Forton Road, Gosport.
- 1.2. 4 -5 The Towers, Forton Road (hereafter referred to as the 'site'), is located in a prominent position on the southern side of the A32 / Forton Road in Gosport. The site is now vacant but formerly comprised the Crown Bingo Hall, and before that it was a cinema. The site is located within a primarily residential area with a Designated Neighbourhood Centre and shopping area immediately to the north east. The site is readily served by bus routes heading in and out of central Gosport and there are a good range of community facilities nearby.
- 1.3. This report details an assessment of whether the building is surplus to requirements as a bingo hall and also the efforts made by the landowner and their consultant team to sell the site for community, cultural, sports, recreation or built leisure uses.
- 1.4. The purpose of undertaking this work is to determine whether the loss of the site as a leisure facility for an alternative use is acceptable and therefore in accordance with the Policy LP32 of the Gosport Borough Local Plan 2011-2029.

### Background

- 1.5. A pre application enquiry was prepared by Squires Planning and submitted to Gosport Borough Council on 20<sup>th</sup> November 2019. The enquiry set out proposals to demolish the existing Bingo Hall at 4-5 The Towers, Forton Road, Gosport. The building would then be replaced with a high quality residential building providing a mix of dwelling types, sizes and tenure to meet the needs of Gosport's current and future population.
- 1.6. The report set out the background to the site, that it was originally a cinema and then a bingo hall from 1968. The building is ageing and is expensive to repair and generally maintain. In recent years, and since the indoor smoking ban in 2007, the average number of customers has been in a continual decline, with the most recent figures showing an almost 50% decline in customers in the past 8 years despite the best efforts of the operator, Crown Bingo, who have extensive experience of operating such sites. Profit/loss data from the past 2 years has shown a dramatic decline in profits to a £69,000 loss in 2018. This continued into 2019 and subsequently led to the unavoidable decision to cease trading at the site. This decline in profits is common across Bingo Halls which have seen a considerable decline in footfall in recent years. Unfortunately, the site is now surplus to requirements for the particular use as a Bingo Hall.
- 1.7. The response of Gosport Borough Council to the pre application enquiry dated 3 February 2020 included consideration of the proposals against Local Plan Policy LP32 (Community, Cultural, and Built Leisure Facilities).

#### 1.8. Policy LP32 states:

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Planning permission will not be granted for development which would result in the loss of existing community, cultural, sports, recreation and built leisure facilities unless it can be demonstrated that:

a) an assessment has been undertaken which has clearly shown the buildings to be surplus to requirements for that particular purpose; or

*b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; and* 

c) it can be demonstrated that there are no other viable community, cultural, sports, recreation or built leisure uses for the premises or site and that there have been reasonable attempts to sell/let them for these purposes.

- 1.9. The supporting text to Policy LP32 provides guidance. To meet the tests above, it will be necessary for the developer to demonstrate that the building is no longer required for its existing or recent function. Reasons could include that there is no longer a local demand or that satisfactory provision exists elsewhere in the locality. Information required includes: the details of the marketing including advertising methods which are proportionate to the nature of the premises; details of the prices that the properties have marketed at, and whether this represents a competitive local market rate; and details of any interest received.
- 1.10. The pre application enquiry response considered that, at that time, insufficient information and justification had been provided to clearly demonstrate that the building is surplus to requirements for built leisure (criterion (a) of Policy LP32). It was also noted that it had not been demonstrated that there are no other viable Class D2 uses for the site. No information had been provided relating to reasonable attempts to sell or let the premises for these purposes with the pre application enquiry.
- 1.11. To determine whether there is a viable alternative Class D2 use for the site it was decided to undertake a 6 month marketing exercise to try to secure a community, cultural, sport or built leisure use for the site in line with the requirements of policy LP32 and supporting text. The methodology for undertaking the marketing exercise was agreed with the council and this is set out in section 3:

5

## 2. Need for existing use

2.1. In accordance with Policy LP32 paragraph (a), this section demonstrates that the building is no longer required for its recent function as a bingo hall.

### National Trend

- 2.2. It is important to note the state of the bingo industry in the UK and in that context the effect on the bingo business that operated in the subject premises. Peter Arnett Leisure trading as Crown Bingo have operated a Bingo Hall in the property since 1968.
- 2.3. In recent years in line with the national trend, there has been a dramatic decline in attendance numbers. The reasons for this decline included initially, the smoking ban, which came into force on 1 July 2007. A survey by the bingo operators revealed that 63% of bingo players were smokers and as they were prevented from smoking inside bingo halls many stopped attending the effect of this on the industry was substantial.
- 2.4. The rise of online bingo has also had a substantial impact on the bricks and mortar bingo sites as can be seen in the following news articles:
  - A news article (March 2018) reported a '14 per cent decline in bricks and mortar bingo participation allied to a fall in the number of premises'.<sup>1</sup>
  - In 2019 Rank Group, the largest Bingo operator in the UK suffered a 14% decline in footfall.<sup>2</sup>
  - A news article (Oct 2018) stated that 'Gaming observers believe the trend for Rank is going to continue with a decline in bricks and mortar business but a rise in digital'<sup>3</sup>

<sup>2</sup> http://www.casinoguardian.co.uk/2019/08/23/rank-group-full-year-performance-hit-by-slowing-sales-at-grosvenor-casinos-and-mecca-bingo-halls-footfall-decline/

<sup>&</sup>lt;sup>1</sup> https://totallygaming.com/news/lottery/participation-study-reveals-subtly-changing-face-uk-gaming

<sup>&</sup>lt;sup>3</sup> https://gaming-awards.com/NEWS/rank-group-again-suffers-casino-bingo-decline/

### Site Attendance Data

2.5. Crown Bingo record attendance numbers and, through their membership data, can record the level of attendance by an individual. This data is set out below:

Year	Average total visits per week	Average no. of customers per week
2012	1397	751
2013	1390	759
2014	1334	745
2015	1318	691
2016	1150	604
2017	993	590
2018	881	579
2019	750	471

Figure 1: Crown Bingo attendance figures since 2012

- 2.6. In order to combat the decline in numbers Crown Bingo have tried as many initiatives as possible including promotions, increased prize money, and improving facilities which are all considered to have helped to some degree but were unable to combat the overall declining attendance.
- 2.7. As part of efforts to halt and revert the declining attendance levels Crown Bingo continually analysed where customers come from. Over the last 6 months of 2019 there were 16,410 visits to the Bingo Hall and:
  - 7,469 came from the PO12 postcode Gosport 46%
  - 4,726 came from the PO13 postcode Gosport and Fareham 29%
  - 1,373 came from the PO14 postcode Stubbington and Titchfield 8%
  - 2,842 came from other postcode areas within not one having more than 4% of attendees.
- 2.8. These figures show that the site attracts most of its customers from its immediate surrounding area. Acute concerns are therefore raised when the site has declining attendance as it demonstrates that there is declining need for a bingo hall in its particular location.

## Site Trading Data

2.9. Considering the declining attendance and need for a bingo hall in this location, it is not surprising that trading conditions are very challenging. We enclose the headline company profit/loss data from the site's accounts for the last 7.5 years below:

Year	Profit	Commentary
2012	£55,558	-O'L
2013	£34,730	
2014	(£11,052)	Financial loss
2015	£56,931	Concerted effort to improve the 'spend per head' through the introductions of offers and incentives. Modest profit achieved.
2016	£47,079	Effect of offers and incentives diminishes despite considerable continued efforts to sustain 2015 takings.
2017	£21,963	Decline in takings continued despite efforts to reverse trend.
2018	(£69,749)	Substantial financial loss.
2019	(£99,702)	Unsustainable financial loss.
2020	TBC	Trading at the site ceased on 30 January 2020. Business closed on 3rd May 2020.

Figure 2: Crown Bingo profit & loss data for the last 7.5 years

- 2.10. As noted above there was a concerted effort by the business to improve the 'spend per head' following the loss in 2014 and a modest return to profit was achieved. Unfortunately, this strategy only brought the site back into modest profit for two years (2015/2016) but has declined since to a significant loss in 2018 and H1 2019. The company have now exhausted all avenues to reverse the trend at this site. They arrived at the inevitable recognition that they cannot support this loss-making venture that has clearly become financially unviable against the backdrop of the declining bingo industry and increasing popularity of online bingo sites. The operator made the difficult but unavoidable decision to cease trading at this site on 30 January 2020 and the business closed on 3rd May 2020.
- 2.11. Unfortunately, the business on the site is not sustainable and the company is unable to subsidise its operation from the other sites run by Crown Bingo in Cosham, Havant and Bognor Regis which all face similar pressures.

### Pre-marketing efforts to maintain existing use

- 2.12. The property was offered for sale as a going concern to other Bingo Operators in 2018/19 but given the loss making position shown in the accounts and the efforts of a very experienced Bingo Operator to maintain a profit the marketing venture proved to be unsuccessful. The current landowner owns and has operated Bingo Halls in Hampshire and West Sussex for over fifty years. All the venues are owned freehold and the company is not a landlord therefore the letting of the property is not an activity which will fit within their business model.
- 2.13. It is therefore noted that the landowner has already sought to ensure the continuation of

9

# 3. Sale of site for community use

- 3.1. A proposed marketing strategy was sent to Gosport Borough Council on 9<sup>th</sup> March 2020 for agreement. Their response on 13<sup>th</sup> March highlighted that they would need to be satisfied that any Agent undertaking the marketing exercise can market the site to an appropriate leisure/commercial market nationally in an adequate manner, rather than using a national commercial agent.
- 3.2. Confirmation was given that Tony Lewis BA (Hons) FRICS, an experienced surveyor who has conducted acquisitions and disposals throughout the UK particularly in the bingo and wider leisure industry would be implementing the marketing strategy. Circulation of the particulars and notification of the marketing to national and local surveyors and agents would be undertaken. This includes Jones Lang LaSalle, CBRE, Vail Williams, Lambert Smith Hampton, Hellier Langston and Savills. In addition, many smaller local firms will be contacted. This approach is common practice in the industry and helps to achieve even further exposure to the market particularly where firms have applicants on their books looking for such an opportunity.
- 3.3. Gosport Borough Council (GBC) responded on 17<sup>th</sup> March agreeing to the proposed strategy. The Marketing Strategy as agreed, is included in Appendix A.
- 3.4. In summary, the property, which is an extensive building of approximately 13,500 sq ft and currently being used as a Bingo Hall (formerly D2 Use Class, now Sui Generis) was offered for sale freehold with vacant possession. Given the property's prominent position, its size and current use it was been valued at £600,000 and offers were invited in excess of this value. This value was considered to be realistic and affordable for a range of community, cultural, sports, recreation or built leisure uses.
- 3.5. Prior to commencement of the 6 month marketing period on 14<sup>th</sup> March 2020, the following three activities were actioned:
  - Preparation of detailed sales particulars to include internal and external photographs, floor areas and description of the premises. (Appendix B)
  - Erection of marketing board on the main frontage of the property advertising 'Freehold for sale'. 'V' board to facilitate visual identification from north and south of the premises and include contact details of the selling agent.
    - National online advertising campaign to ensure maximum coverage of availability of the property (Rightmove website). Listing included the sales particulars (Appendix C).
  - During the first month of the marketing exercise the detailed sales particulars were circulated to local and national commercial surveyors and estate agents.
- 3.7. In accordance with the Marketing Strategy the following actions were undertaken by the agent for each prospective purchaser that showed an interest:

3.6.

- Sent the sales particulars to the prospective purchaser by email, if requested to do so, within 24 hours of enquiry.
- Arranged viewings for interested parties.
- Answered any queries about the property (as far as possible) based upon information available.
- Sent further information including floor plans and additional photographs to applicants where requested
- 3.8. A log of relevant activities including but not limited to enquiries, viewings and offers during the 6-month marketing period has been compiled and is set out in the next section.
- 3.9. It is agreed that, should an offer be made, the agent will undertake due diligence and an offer will be accepted if:
  - The prospective purchaser offers the asking price for the property or an amount lower that is considered acceptable by the landowner. AND
  - The prospective purchaser has cleared funds available to purchase the property at the agreed price. AND
  - The prospective purchaser will be utilising the building for a viable cultural, sports, recreation or built leisure use.
- 3.10. If at 6 months post commencement of the marketing exercise the property has not had an offer accepted or sold in accordance with the above strategy, then the landowner may choose to submit a planning application for the redevelopment of the site. In such an event the requirements of 5(c) of Policy LP32 will be considered met.
- 3.11. The marketing strategy was implemented by Tony Lewis BA (Hons ) FRICS of Tony Lewis Surveyors Ltd. on behalf of Peter Arnett Leisure. Tony is a Fellow of the Royal Institution of Chartered Surveyors and has had his own surveying and agency practice for over twenty years.
- 3.12. The Activity Log prepared, and commentary on the activity log is set out below.



	Date	Applicant	Activity/Detail	Action/Comments
x X	14/02/2020	No.1	Local Bingo Hall operator interested in taking over business	Direct to Peter Arnett Leisure Concerns about how purchase would be funded
	06/03/2020	No.2	Applicant's preference to lease. Start up business based in the Midlands.	Sent pdf particulars.
	14/03/2020		Beginning of marketing period.	
	14/03/2020		Sales particulars circulated to agents (see Appendix A)	

Date	Applicant	Activity/Detail	Action/Comments
14/03/2020		Advertising live on Rightmove (see Appendix C)	
17/03/2020		For sale board erected	ember 202
19/03/2020	No.3	Adjoining property owner. General enquiry. Wants to be kept informed. Not in a position to buy.	<u>S</u>
23/03/2020	No.4	Speculator who buys and sells property. No interest in retaining a community/leisure use.	Sent pdf particulars
24/03/2020			
30/03/2020	No.1	Dropped out of negotiations. 'No future as a bingo hall'	
01/04/2020	No.5	Possible sheltered housing scheme.	Sent pdf particulars
02/04/2020	No.5	Agent followed up with a phone call. Applicant raised issues with funding	
02/04/2020	No.2	Applicant proposes Bingo as main use but rent only.	
02/04/2020	No.6	Interested in redevelopment but intentions unclear.	Sent pdf particulars
14/04/2020	No.7	Sports Club operator. Lease on snooker club and gym in Stubbington. Lease about to expire and looking to relocate.	Sent pdf particulars and plans.
14/04/2020	No.7	Query about parking answered.	
15/04/2020	No.7	Further queries. Further internal photographs.	Sent more photos
15/04/2020	No.2	Further queries. Concerns about roof leaks.	Roof leak investigated and query answered.
16/04/2020	No.8	Dance Club in Quay Lane. GBC support for expansion mentioned.	Sent particulars and plans.
20/04/2020	No.7	Viewing. 6 people attended for over 2 hrs.	Numerous queries answered regarding building, planning and licences.
22/04/2020	No.7	Offer received at £560K but with numerous conditions. Subject to sale of applicant's current business & Govt grant. Later offered £600K subject to survey. Concerns about roof leaks.	Applicant has a dispute with his existing landlord to be resolved Also uncertainty over Govt grant and whether it can be used as deposit.
27/04/2020	No.8	Agent followed up with phone call. Applicant comments 'Great building but dated'. Main concern is sloping floor as they need flat floor. Applicant making enquiries regarding the cost of refurbishment/alteration.	Looking at building logistics & finances. Applicant will call in the next few days.

Date	Applicant	Activity/Detail	Action/Comments
04/05/2020	No.7	Agent submitted counter offer to applicant to sell at £575K in current state of repair to encourage sale.	No response from the applicant.
06/05/2020	No.8	Applicant obtained quotes for building works to level the floor which doubles the cost. No grants available from Sports England as non-Olympic Sport	Sadly unable to proceed.
14/05/2020	No.9	A Cheerleading Group.	Sent pdf particulars, plans, and additional photos.
20/05/2020	No.7	Agent follows up correspondence from 04/05. Applicant responds requiring more time due to personal reasons.	201
22/05/2020	No.2	Applicant offers to take a lease. Initial rent £50K but inside repairs only. Govt grant? Is this the Covid 19 business support? Unlikely to be able to use as deposit. Agent proposes counter offer at £75K per annum and full repairing terms.	Need for Guarantor and rent deposit as start up business. Offer rejected as applicant would not proceed on full repairing basis. Applicant then enquired about possibility of buying seats only!
30/05/2020	No.10	Applicant interested in mixed use including bingo.	Sent pdf particulars
01/06/2020	No.11	Applicant thought it was a shop only.	No action required
01/06/2020	No.9	Applicant viewed with family and builder. Height of building is important. Possible use of first floor as cafe.	Viewing arranged.
01/06/2020	No.10	Further enquiries about the property.	Sent plans and more photos. Possible viewing.
08/06/2020	No.9	Follow up call. Left message.	N/A
08/06/2020	No.10	Viewing arranged for 11/06	N/A
10/06/2020	Agents	Recirculation of sales particulars to agents (National & local)	
11/06/2020	No.10	Viewing. Architect and builder. Interested in the possibilities and potential uses.	Uncertainty over funding for purchase and alterations.
12/06/2020	No.9	Chased by email.	Applicant concluded that too much work to the building is required. Cost prohibitive and unable to make an offer.
16/06/2020	No.10	Follow up call. Applicant has reported to a syndicate. Looking at various options. Agent suggests the possibility of a sale at £500K which is £100k below the initial sale price.	
16/06/2020	No.11	Looking at redevelopment for flats.	c £500K STP and 12 months 'exclusive clause. Not acceptable to client because would lose control of process. Would not secure the use of the site for existing or other community use.
08/07/2020	No.12	General enquiry from National Agent on behalf of clients.	Sent pdf particulars. Follow up phone call.
26/06/2020	No.13	Applicant interested in site for redevelopment only.	Sent pdf particulars.
14/07/2020	No.7	Offer to accept applicant's bid of £560K STC only.	No reply from applicant received since 20/05/2020.

Date	Applicant	Activity/Detail	Action/Comments
18/07/2020	No.14	Applicant interested in opening a strip club.	Would not give contact details so could not send particulars. Not a community use.
28/07/2020		PRICE REDUCTION TO £500K	<ul> <li>Amended Rightmove entry.</li> <li>Advised agents.</li> <li>Contacted all previous applicants advising asking price reduction.</li> </ul>
29/07/2020	No.15	Local agent acting on behalf of clients – would vendor accept subject to planning offer (for development) with 12 month's tie in, i.e. property to be taken off market and potential purchaser given exclusive rights to pursue planning.	Suggestion impractical and unacceptable to clients. Would not secure the use of the site for existing or other community use.
07/08/2020	No.16	Looking at residential redevelopment.	Sent sales particulars.
11/08/2020	No.17	Enquiry from Property Investment Company.	Sent particulars
17/08/2020	No.17	Further enquiries.	5
18/08/2020	No.17	Arranged viewing of property.	Clients have wide ranging property portfolio. Subject property will not suit because too much expenditure on alterations required.
14/09/2020		End of 6-month marketing period.	

### Commentary

- 3.13. The relevant period began on the 14<sup>th</sup> March and 6 months therefore concluded on 14<sup>th</sup> September. The property was valued at £600,000 for the freehold interest and offers were invited in excess of this value. On the 28<sup>th</sup> July the price was reduced to £500,000 to stimulate interest and encourage a sale for suitable use, i.e. community, cultural, sports, recreation or built leisure use.
- 3.14. Over the 6 month period there was a reasonable level of interest. This is shown on the market activity reports in Appendix C. Interest averaged between 8 12 online views a day with a spike in views in late April. This appears to coincide with the launching of the Coronavirus government grant scheme for small businesses and retail, hospitality and leisure businesses. The price reduction on 28<sup>th</sup> July lead to a slight increase in interest and may also have helped sustain interest at around 8 12 views per day for the remaining marketing period.
- 3.15 A summary of the interest in the property in its existing use or as a community/leisure facility is set out below:
  - Tony Lewis Surveyors Ltd have reported that applicant No.7 came the closest to purchasing the property. The applicant's intention was to relocate their snooker hall/gym to the site from their existing premises approximately 5 miles away. The agent offered to accept applicant's bid of £560K STC only on 14<sup>th</sup> July 2020. Unfortunately, it became apparent that the applicant did not have the necessary funding for the project and stopped all communication.

- Applicant No.8 was also keen to purchase the property for use as a nursery, dance hall and function room but the cost of adaptation and particularly the levelling of the racked floor was too expensive.
- Applicant No.2 wanted to start a business as a bingo hall operator but the applicant is based in the Midlands and as a start-up has no track record of operating a bingo hall. The applicant would only take a lease on internal repairing terms which would leave the existing owners with a continuing external repairs liability. This was not acceptable and there appeared to be no business plan for the enterprise.
- 3.16. The offers received could not be accepted as they did not meet the 3 tests set out in the marketing strategy which are:
  - The prospective purchaser offers the asking price for the property or an amount lower that is considered acceptable by the landowner. AND
  - The prospective purchaser has cleared funds available to purchase the property at the agreed price. AND
  - The prospective purchaser will be utilising the building for a viable cultural, sports, recreation or built leisure use.
- 3.17. There were a number of other enquiries but none resulted in an offer for the property.

# 4. Conclusion

- 4.1. The Facility Needs Assessment and marketing exercise has been undertaken in accordance with Policy LP32, its supporting text and the agreed marketing strategy.
- 4.2. Recent trading and market conditions nationally and locally have led to the existing use of the bingo hall being no longer required due to lack of demand. It is also clear from the marketing exercise that the prospect of it being used for other community/leisure uses is highly unlikely considering the costs involved in repairing, maintaining and/or adapting the premises for an alternative community use. There has been no suitable offer put forward during the 6-month marketing period.
- 4.3. The requirements of 5 (a) and (c) of Policy LP32 have been met:

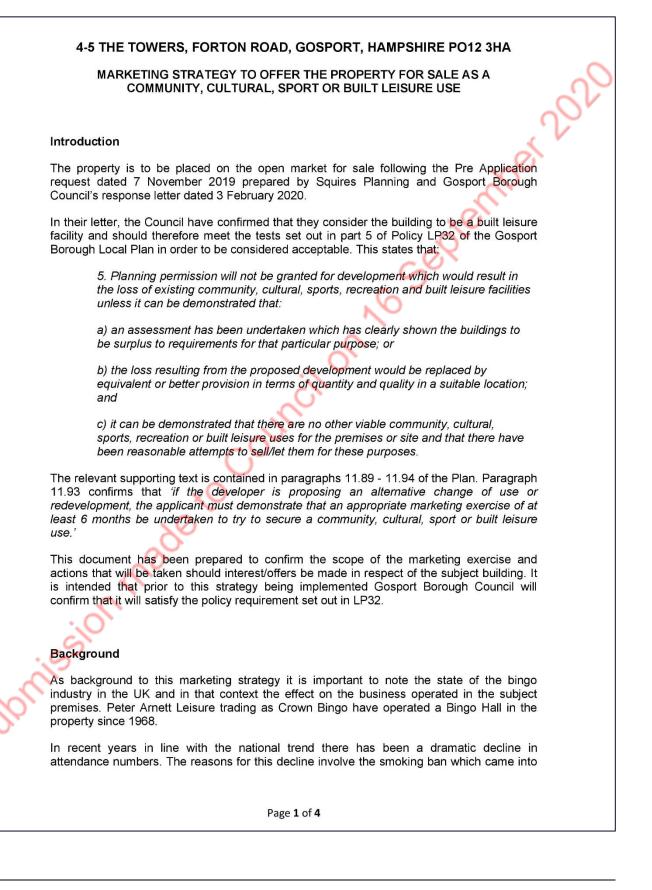
a) an assessment has been undertaken which has clearly shown the buildings to be surplus to requirements for that particular purpose; or

c) it can be demonstrated that there are no other viable community, cultural, sports, recreation or built leisure uses for the premises or site and that there have been reasonable attempts to sell/let them for these purposes.

4.4. When this requirement is met Policy LP32 allows the grant of permission for development which would result in the loss of existing community, cultural, sports, recreation or built leisure facility such as this. Therefore, Policy LP32 should not prevent the site being redeveloped for an alternative use and should be considered acceptable in principle.

16

# Appendix A – Agreed Marketing Strategy



force on 1 July 2007 and the rise of online bingo. Crown Bingo have tried many incentives to maintain numbers including promotions, increased prize money and improvements of facilities. These initiatives have helped to some extent but unfortunately have been unable to combat the overall decline in attendance and its obvious effect on profitability. The business was brought back into modest profit for two years but the company now recognises that they cannot support this loss making venture that has clearly become financially unviable.

The property was offered for sale as a going concern to other Bingo Operators in 2018/19 but given the loss making position shown in the accounts and the efforts of a very experienced Bingo Operator to maintain a profit the marketing venture proved to be unsuccessful. The current landowner owns and has operated Bingo Halls in Hampshire and West Sussex for over fifty years. All the venues are owned freehold and the company is not a landlord therefore the letting the property is not an activity which will fit within their business model.

It is therefore noted that the landowner has already sought to ensure the continuation of the current building's use prior to investigating alternative options.

#### **Marketing Strategy**

The property, which is an extensive building of approximately 13,500 sq ft and currently in D2 use, is to be offered for sale freehold with vacant possession.

Given the prominent position of the property, the extent of the accommodation and current use it has been valued at £600,000 for the freehold interest and offers are to be invited in excess of this value. This value is realistic and is affordable for a range of community, cultural, sports, recreation or built leisure uses. It is recognised that given the potential range of uses envisaged by Policy LP32 that planning consent may be required for a change of use in some cases and this fact will need to be taken into consideration when dealing with prospective buyers.

The overall marketing strategy will consist of the following and the six months required by policy LP32 will commence once the following three activities have been actioned:

- 1. Preparation of detailed sales particulars to include internal and external photographs, floor areas and description of the premises.
- 2. Erection of marketing board on the main frontage of the property advertising 'Freehold for sale'. 'V' board to facilitate visual identification from north and south of the premises and include contact details of the selling agent.
- National online advertising campaign to ensure maximum coverage of availability of the property (eg Rightmove or Zoopla websites). Listing to include the material prepared in item 1 above.

During the first month of the marketing exercise the detailed sales particulars will be circulated to local and national commercial surveyors and estate agents.

Page 2 of 4

Should interest in the subject property be made by a prospective purchaser the agent will:

- 1. Send the sales particulars to the prospective purchaser by email, if requested to do so, within 24 hours of enquiry.
- 2. Arrange viewings for interested parties.

ubmission made to

3. Answer any queries about the property ( as far as possible ) based upon information available

In addition, the agent will maintain a log of relevant activities including but not limited to enquiries, viewings and offers for a period of at least 6 months from commencement of the marketing exercise. An example of this is included at Appendix 1.

Should an offer be made the agent will undertake due diligence and an offer will be accepted if:

- 1. The prospective purchaser offers the asking price for the property or an amount lower that is considered acceptable by the landowner. AND
- 2. The prospective purchaser has cleared funds available to purchase the property at the agreed price. AND
- 3. The prospective purchaser will be utilising the building for a viable cultural, sports, recreation or built leisure use.

If at 6 months post commencement of the marketing exercise the property has not had an offer accepted or sold in accordance with the above strategy, then the landowner may choose to submit a planning application for the redevelopment of the site. In such an event the requirements of 5(c) of Policy LP32 will be considered met.

Page 3 of 4

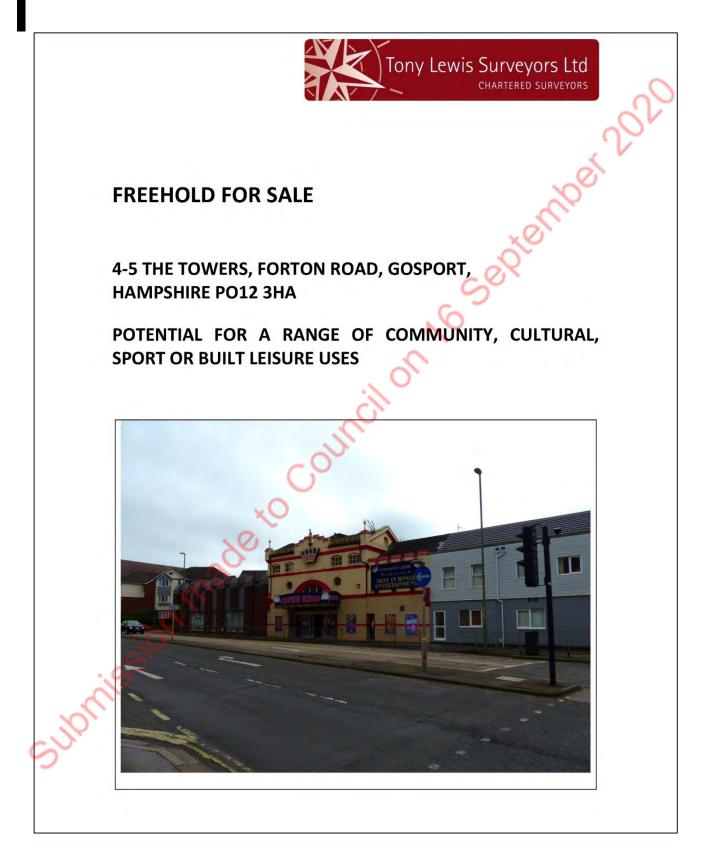
#### Appendix 1 - Example Activity Log

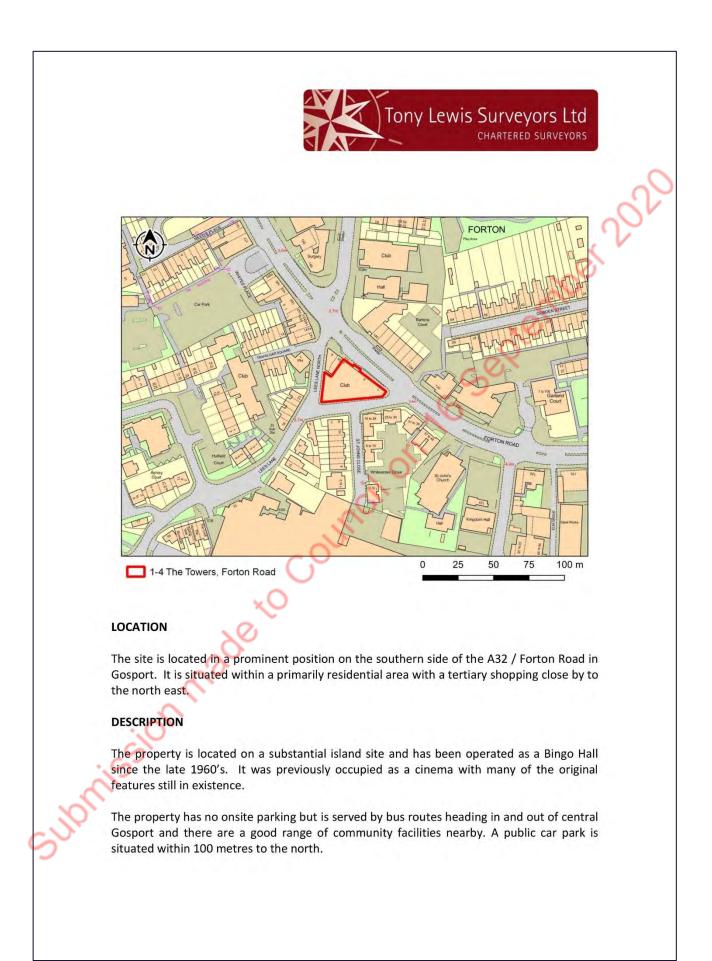
The below is an **example** of the activity log that will be completed in accordance with the above strategy:

10/03/2020 15/03/2020 17/03/2020 See www.right 20/03/2020 Send pdf to
See www.right.         20/03/2020           Send pdf to         20/03/2020
See www.right 20/03/2020 20/03/2020 Send pdf to
20/03/2020 Send pdf to
Send pdf to
5

Page 4 of 4

# Appendix B – Sales Particulars







#### ACCOMODATION

Entrance foyer and steps up to the lobby leading to the main auditorium with seating on a raked (sloping) floor. 1970's extension on main road frontage with flat floor. The auditorium has a stage with stores behind. Ancillary accommodation includes food preparation area, bar, gaming machines area, stores, and male and female WC's.

Access via stairs from the main lobby to first floor function room with bar, offices and circle (unused).



#### FLOOR AREA

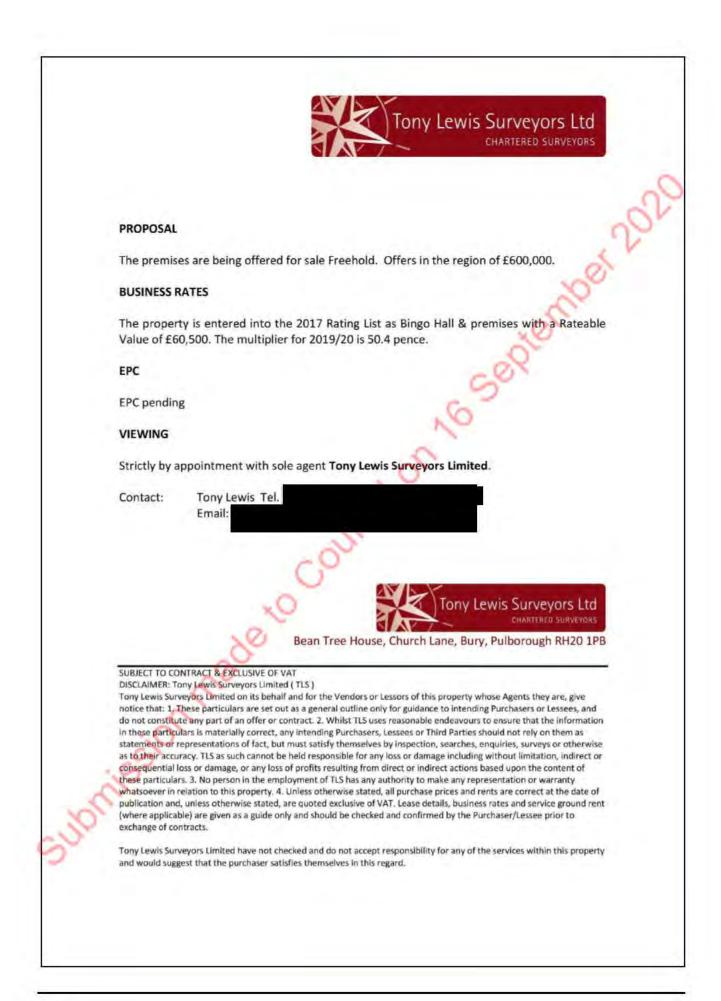
The whole property extends to 13,530 sq ft (1,256.96 m<sup>2</sup>) gross internal area.

#### PLANNING

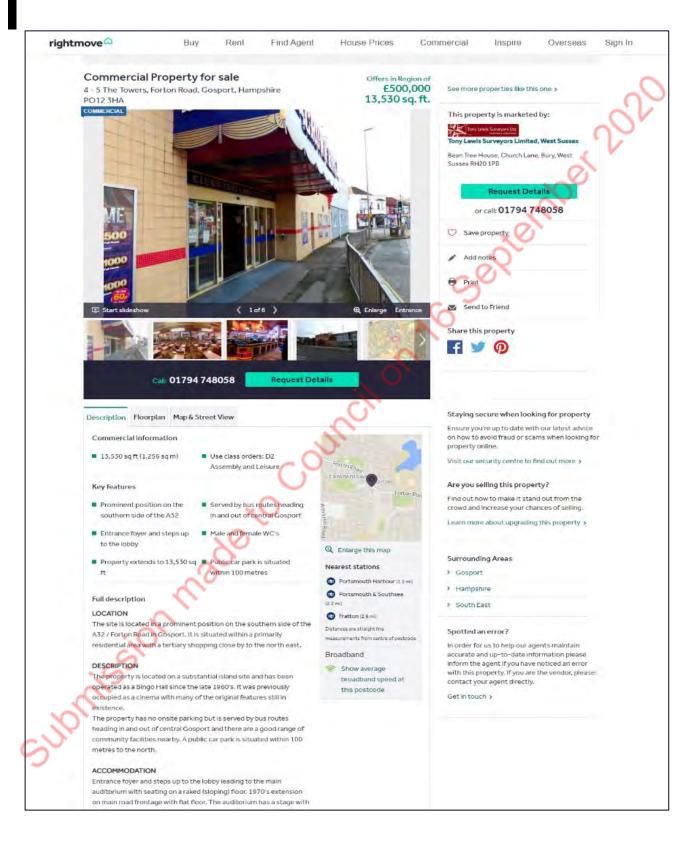
VAT

The premises are designated for D2 Use (Assembly & Leisure) within the Town & Country Planning Use Classes Order 1987. Other proposed uses may be available subject to planning permission.

It is understood that the property is not registered for VAT



# Appendix C – Online Rightmove Listing



#### DESCRIPTION

The property is located on a substantial island site and has been operated as a Bingo Hall since the late 1960's. It was previously occupied as a cinema with many of the original features still in existence.

The property has no onsite parking but is served by bus routes heading in and out of central Gosport and there are a good range of community facilities nearby. A public car park is situated within 100 metres to the horth.

#### ACCOMMODATION

Entrance foyer and steps up to the lobby leading to the main auditorium with seating on a raked (stoping) floor. 1970's extension on main road frontage with flat floor. The auditorium has a stage with stores behind. Ancillary accommodation includes food preparation area, bar, gaming machines area, stores, and male and female WC's. Access via stairs from the main lobby to first floor function room with bar, offices and circle (unused).

#### FLOOR AREA

The whole property extends to  $13,530~{\rm sq}$  ft  $(1,256.96~{\rm m2})~{\rm gross}$  internal area,

#### PLANNING

The premises are designated for D2 Use (Assembly & Leisure ) within the Town & Country Planning Use Classes Order 1987. Other proposed uses may be available subject to planning permission.

#### VAT

It is understood that the property is not registered for VAT

#### PROPOSAL

The premises are being offered for sale Freebold. Offers in the region of  $\pm 500,000$ .

#### BUSINESS RATES

The property is entered into the 2017 Rating List as Bingo Hall & premises with a Rateable Value of £60,500. The multiplier for 2019/20 is 50.4 pence.

#### EPC EPC pending

- - Farrand

#### More information from this agent

Brochure @

Disclaimer - Property reference Thetowers. The information displayed about this property comprises a property advertisement. Rightmove could makes no warrantly as to the accuracy or completeness of the advertisement or any linked or associated information, and Rightmove has no control over the content. This property advertisement does not constitute property particulars. The information is provided and maintained by Tany Lawis Surveyors Limited, Wast Sussex, Please contact the selfing agent or developer ofrectly to obtain any information which may be available under the terms of The Energy Performance of Buildings (Certificates and Inspections) (England and Wales) Regulations 2007 or the Home Report if in relation to a resignatial property in Scotland.

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<sup>4</sup> Average speeds are based on the download speeds of at least 50% of customers at peak time (8pm to 10pm) from packages
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accurate and up-to-date information please inform the agent if you have noticed an error with this property. If you are the vendor, please contact your agent directly.

Get in touch >

ncil on No september 2020





### Highways Overview

Site:4-5 The Towers, Forton Road, GosportPrepared by:EUApproved by:PBDate:15th September 2020



Tel: 01483 531300 www.motion.co.uk

## 1.0 About / Background

- 1.1 Motion has prepared a Transport Scoping Report and participated in pre-application discussions with Hampshire County Council (HCC) as the Highway Authority, on behalf of Peter Arnett Leisure, in respect of a proposed residential development located at 4-5 The Towers, Forton Road, Gosport.
- 1.2 The site is located approximately 1.5 kilometres west of Gosport town centre, to the south of the A32 Forton Road. The site previously accommodated Crown Bingo which had a capacity of circa 800 people.
- 1.3 Work by Motion, follows pre-application discussions with Gosport Borough Council in January 2020 which related to a previous scheme for the demolition of the existing building and the erection of 28 flats (with 18 parking spaces). A Transport Scoping Statement prepared by Bright Plan was submitted to GBC as part of these discussions. A formal response was received from Gosport Borough Council in February 2020 which outlined a number of highway concerns, these have been specifically addressed as the current proposals have been prepared.
- 1.4 The site is now being promoted for the demolition of the existing building and the erection of 24 flats, with at least 15 unallocated parking spaces. The proposals also include the introduction of a vehicular access taken from Lees Lane to the south of the site. The Transport Scoping Report, prepared by Motion, is attached at Enclosure 1. It provides detail in respect of vehicle/pedestrian access, servicing, parking and the potential trip generation associated with the current proposals.
- 1.5 The Transport Scoping Report was submitted to HCC prior to an online pre-application meeting with Fraser Spinney of HCC on Friday 4<sup>th</sup> September 2020. The meeting was held to discuss the proposals from a highways and transportation perspective. A formal pre-application response from HCC was received on Monday 14<sup>th</sup> September 2020. A copy of the response is attached at Enclosure 2.

## 2.0 Overview

- 2.1 Pre-application discussions with HCC have been positive. Some comments relating to the access design have been received which can easily be addressed at the detailed design/planning application stage, as suggested by HCC. In particular:
  - The type of access proposed has been queried by HCC. The access design will be revised at the detailed design/planning application stage to show a more conventional vehicle crossover as opposed to a bellmouth access with road markings.
  - HCC have queried the visibility splays required at the proposed access and requested measured speeds along Lees Lane to determine the 'y' distance for visibility from the proposed access onto Lees Lane. Speed surveys will be commissioned to confirm the appropriate visibility splays at the planning application stage. From our site visit we believe the visibility splays shown in the Transport Scoping Report to be appropriate.
    - Inter-visibility between the driver and any pedestrians using the footway along Lees Lane has been queried. This will again be looked at during the detailed design/planning application stage, the entrance into the building can be modified to facilitate the required inter-visibility.
  - Aside from the above, HCC has accepted the proposals in terms of pedestrian connectivity, sustainable modes, parking and trip generation.



1



2.3 The proposed development would not result in severe impacts on the local highway network. As a result, and in accordance with National and Local Planning Policy, there are no traffic or transport related reasons why, if ur subritasion nade to council on the september when the september whe a planning application were made, that the proposed development would not be granted planning permission.



Submission

4-5 The Towers, Forton Road, Gosport

uncilon Transport Scoping Report

For

Peter Arnett Leisure





**Document Control Sheet** 

4-5 The Towers, Forton Road, Gosport

Peter Arnett Leisure

This document has been issued and amended as follows: Date Issue Prepared by Approved by Submission made to PB 11/08/2020 1<sup>st</sup> Draft EU Motion 84 North Street







# Contents

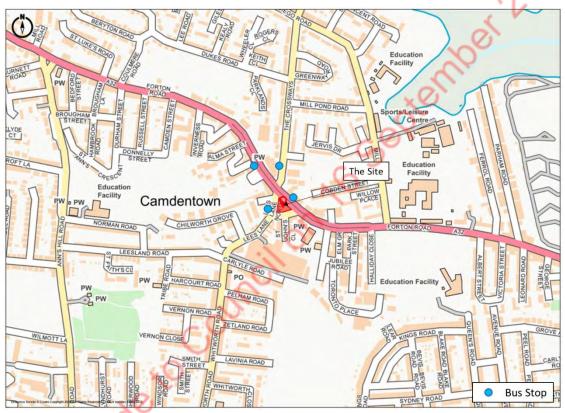
1.0	Introduction	1
2.0	Baseline Conditions	3
3.0	Proposed Development	5
	On-street Parking Impact	
	Trip Generation	
6.0	Summary and Conclusion	14

6.0	Summary and Conclusion14
Figu	ures
Figur	re 1: Site Location Plan
Figur	re 2: Parking Survey Area
Арр	pendices
А	Proposed Access Arrangements
В	Swept Path Analysis – Large Car
С	Swept Path Analysis – Refuse Vehicle
D	Parking Survey Results
E	TRICS Output – Bingo Hall
F	TRICS Output - Flats
SUD	Parking Survey Results TRICS Output - Bingo Hall TRICS Output - Flats



# 1.0 Introduction

- 1.1 This Transport Scoping Report has been prepared on behalf of Peter Arnett Leisure in connection with a pre-application submission to Hampshire County Council (HCC) in respect of a proposed residential development located at 4-5 The Towers, Forton Road, Gosport (herein referred to as 'the site').
- 1.2 The site is located approximately 1.5 kilometres west of Gosport town centre, to the south of the A32 Forton Road. The administrative authorities are Gosport Borough Council (Local Planning Authority) and Hampshire County Council (County Highway Authority). The location of the site is illustrated in Figure 1 below.



## Figure 1: Site Location Plan

- 1.3 The site previously accommodated Crown Bingo which had a capacity of circa 800 people. The proposals seek planning permission for the demolition of the existing building and the erection of 24 flats. The proposals also include the introduction of a vehicular access taken from Lees Lane to the south of the site.
- 1.4 Pre-application discussions were held with Gosport Borough Council (GBC) in January 2020 in relation to the demolition of the existing building and the erection of 28 flats, including 18 parking spaces at the site. A Transport Scoping Statement prepared by Bright Plan was submitted to GBC as part of the discussions. A formal response was received from GBC in February 2020 which outlined a number of highway concerns, these are summarised below:
  - Lack of on-site parking leading to pressure to residential parking on-street;
  - Lambeth parking surveys were undertaken during the school summer holidays. This was raised by GBC due to an error within the previous Transport Scoping Statement ;
  - An assessment of likely reductions in demand for car ownership should be undertaken;



- Public car parks must not be relied upon to remain available in the long term, and it must not be assumed that such facilities appropriate for residents, though some may be suitable for visitor parking;
- Data should be provided in order to understand the parking demand associated with the former bingo use and where such parking took place;
- Parking spaces should have a minimum width of 2.5 metres and accessible spaces should be provided in accordance with GBC's standards;
- The vehicular entrance to the site at 4.8 metres in width will just allow two cars to pass but leaves little margin for error and may lead to conflict if two cars meet at the access. As such, a wider entrance would be beneficial;
- Visibility splays should be assessed by Hampshire County Council; and
- Having a racking system for cycle parking is not the preferred solution and would not be convenient to use by all.
- 1.5 The pre-application discussions with GBC have been taken into consideration during the preparation of this Transport Scoping Report.
- 1.6 This Transport Scoping Report provides detail in respect to vehicle/pedestrian access, servicing, parking and potential trip generation associated with the above proposals. In highways terms, the site and proposal would be compliant with national and local policies.



# 2.0 Baseline Conditions

#### Site Details and Local Highway Network

- 2.1 The site is situated the south of the A32 Forton Road and is bounded by Lees Lane to the south and west. The surrounding area can be characterised as mainly residential in nature with a variety of local amenities within close proximity including convenience stores, schools, and health facilities.
- 2.2 The A32 Forton Road runs on a north to south axis between the A27 to the north and Gosport town centre to the south. Forton Road is subject to a 30mph speed limit in the vicinity of the site, with a central reserve separating two lanes of traffic in each direction. Wide footways are provided on both sides of Forton Road, whilst a signalised pedestrian crossing is situated to the north east of the site at the A32 Forton Road/Lees Lane/The Crossways junction. Double yellow lines prevent on-street car parking on Forton Road.
- 2.3 Lees Lane to the west of the site comprises a bus lane on the eastern side of the carriageway, as well as bus stop adjacent to the site. Within the vicinity of the site traffic is restricted to eastbound only due to the presence of the bus lane. As such vehicles requiring access to the site will use Lees Lane to the south which is a one-way road westbound and links Forton Road to Lees Lane.
- 2.4 Lees Lane to the south of the site accommodates a loading bay and parking for four vehicles on the northern side of the carriageway. Double yellow lines prevent parking both on the southern side of Lees Lane to the south of the site and along Lees Lane to the west of the site.

### Existing Site

- 2.5 The site was previously used as a bingo hall trading as Crown Bingo. The decision to close the bingo hall was officially announced on 30<sup>th</sup> January 2020 and the business closed on 3<sup>rd</sup> May 2020. The bingo hall had a capacity of circa 800 people and provided evening sessions between 18:40 and 23:00 hours seven days a week, as well as morning session every Monday, Wednesday, Thursday, Saturday and Sunday which begin at 11:30.
- 2.6 The bingo hall attracted members from the local area as well as further afield and many members travelled to the site by car. The bingo hall did not have a designated car park, therefore members would park on-street and within car parks in the surrounding area. This included the four car parking spaces on Lees Lane to the south of the site, as well as along St. John's a residential street which connects with Lees Lane (south) which offers six on-street parking spaces. The representative at Crown Bingo advises that most members parked in Whites Place Car Park, located approximately 100 metres north of the site. This is a free car park and accommodates approximately 70 cars. Once this car park is full members would park on nearby residential roads.
- 2.7 Crown Bingo estimates that approximately 50% of members would have travelled to the site via a private car, when the bingo hall was in operation. Admissions into the bingo hall varied between 50 and 150, as such the previous use could have attracted approximately 75 cars. Additionally, the bingo hall attracted an average of one delivery vehicle per day. These are usually taken via the loading bay on Lees Lane to the south of the site.

### Sustainable Transport Accessibility

- The site is easily accessible on-foot via the adjacent footways on all local roads, providing continuous access towards Gosport town centre and the surrounding residential area.
- 2.9 National Cycle Route (NCR) 224 is located approximately 170 metres south of the site and the local section runs from Wickham to Gosport. NCR 224 connects with NCR 2 to the south which runs along the coast.



2.10 The nearest northbound bus stop is located on the eastern side of Forton Road adjacent to the site, whilst the nearest southbound bus stop is located on Lees Lane directly west of the site. These stops serve route E1 Eclipse which runs between Gosport and Fareham every 12 minutes and bus route 11 which runs between Gosport and Havant Campus four times a day.

#### Access to Local Facilities

2.11 The site is located on the edge of Gosport town centre, thus has access to numerous shops, restaurants stall loca .cated appr. .m the site. and leisure facilities. One pre-school (Noah's Ark Preschool), two primary schools (St Mary's Catholic Primary School and Newton C of E Primary School) and St Vincent College are all located within 500 metres from the site. Additionally, a medical centre and a pharmacy are located approximately 160

3.2



# **Proposed Development**

3.1 The proposals seek planning permission for the demolition of the existing building and the erection of 24 flats, of which five will be 1-bed and nineteen will be 2-bed.

#### Access Arrangements

- Vehicular access to the site will be achieved via the new vehicle crossover taken from Lees Lane to the
- south of the site. The access has been amended since the previous pre-app scheme taking into account concerns raised by GBC. The proposals now include a six metre wide access enabling two cars to comfortably pass at all times, this will provide access to a private parking area. The provision of a simple vehicle crossover is considered appropriate when taking into account the quantum of the development and the number of car parking spaces proposed.
- 3.3 The new access will result in the removal and relocation of the existing loading bay to the east of the new access. As such, the proposed access would result in the loss of two on-street parking spaces. The drawing attached at Appendix A demonstrates the proposed access arrangements.
- 3.4 It is estimated that vehicle speeds along Lees Lane are below 20mph due to the proximity between Forton Road and Lees Lane junctions either side. As such, a visibility splay of 2.4 metres by 25 metres is provided to the east of the site in accordance with Manual for Streets (MfS).
- 3.5 Swept path analysis has been carried out using AutoTrack for a large car, shown for reference at Appendix B. This demonstrates two cars passing at the proposed access. This is considered robust, as a large car within AutoTrack measures circa five metres in length and therefore represents a realistic worst case.

#### Car Parking Provision

- 3.6 The proposals will include at least 15 unallocated car parking spaces, including one accessible parking space, to serve the 24 flats. The parking layout design will aim to incorporate parking spaces in accordance with GBC's guidance.
- 3.7 The proposed car parking provision is considered appropriate considering the site is located close to a number of bus stops and within close proximity to Gosport town centre. Furthermore, pedestrian access in the surrounding area is very good and provides safe links between the site and key local amenities as well numerous shops, restaurants, leisure facilities and employment areas. Various schools, convenience stores, health facilities and areas of public open space are all located within a short walk distance from the site, as such future residents would have little need to own a car.
- The NPPF refers to off-street parking provision in Paragraph 105 which states that local planning 3.8 authorities should take into account the following if setting local parking standards for development:

#### "a) the accessibility of the development;

- b) the type, mix and use of the development;
- c) the availability of and opportunities for public transport;
- d) local car ownership levels; and

e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra low emission vehicles."



3.9 Parking policy for the site is provided within GBC's 'Parking: Supplementary Planning Document' (February 2014). The parking standards set out by GBC for residential uses are summarised in Table 3.1 below.

d 10+ Units
oer unit
per unit
5

Table 3.1: GBC Residential Car Parking Standards

- 3.10 In terms of accessible parking, 5% of the total number of parking spaces should be provided in convenient locations and of appropriate size and layout for use by disabled people.
- 3.11 Car parking is to be unallocated and based on the five 1-bed units and 19 2-bed units a total of 28 car parking spaces should be provided based on GBC's standards.
- 3.12 However, GBC's 'Parking: Supplementary Planning Document' states: "*Reductions in residential car* parking provisions on the grounds of good accessibility to public transport will be considered, but developers must provide evidence to justify the degree of reduction proposed."
- 3.13 The site is located within an accessible location not only in respect of trips by bus, but also in relation to local facilities within Gosport. On this basis, the provision of at least 15 parking spaces (including one accessible space) is considered appropriate for this development, striking a balance between providing an appropriate level of parking and encouraging more sustainable travel. Car parking is considered further in Section 4.

#### Cycle Parking Provision

3.14 Cycle parking will be provided in accordance with GBC's 'Parking: Supplementary Planning Document' (February 2014) summarised below in Table 3.2.

Unit Type	Long Stay	Short Stay
1-bed unit	1 space per unit	1 space per unit
2-bed unit	2 spaces per unit	1 space per unit

Table 3.2: GBC Residential Cycle Parking Standards

3.15 Based on the five 1-bed units and 19 2-bed units a total of 43 long stay and 24 short stay cycle parking spaces will be provided based on GBC's standards. Cycle parking will be accessible to all.

## Servicing and Refuse Collection

3.16 Refuse collection will be undertaken on-street via the relocated loading bay on Lees Lane to the south of the site. Swept path analysis has been carried out using AutoTrack for a large refuse vehicle, shown for reference at Appendix C. This demonstrates a large refuse vehicle entering and exiting the loading bay in forward gear.



# 4.0 On-street Parking Impact

#### Overview

4.1 This section identifies the potential development related parking and existing on-street parking demand, to establish whether there is scope to accommodate any potential overspill parking demand arising from the proposals on-street.

Development Related Parking

- 4.2 To provide an indication of the likely car parking demand associated with the proposed flats, a review of census data for the category 'Accommodation Type by Car or Van Availability' has been investigated for the resident population of the output area within which the site is located (2011 output). This was requested by GBC as part of the previous pre-app scheme.
- 4.3 Since the development proposes flats, a comparison can be made with other flatted developments within this output area. Table 4.1 summarises the car and van availability for housing developments within the Leesland ward.

Number of Cars/Vans	Level of Car/Van Ownership for Flatted Developments
No Cars/Vans	55%
1 Car/Van	38%
2+ Cars/Vans	7%
TOTAL	100%

Table 4.1: Level of Car/Van Availability – Flatted Developments (Leesland ward)

- 4.4 Based on the above, the 24 proposed flats would likely result in 13 households not owning a vehicle, nine households owning one vehicle and two households owning two vehicles. Therefore, the proposals could have a parking demand of 13 vehicles. As the proposals will include at least 15 parking spaces this demand can be accommodated on-site.
- 4.5 It should be reiterated that the site is located within an accessible location on the edge of Gosport town centre. This combined with the proximity to bus stops, everyday local amenities, shops, health care facilities and employment areas, will inevitably lead to low car ownership. As such, the proposed development is ideally located to encourage people to travel to the site by more sustainable modes of transport besides the private car.

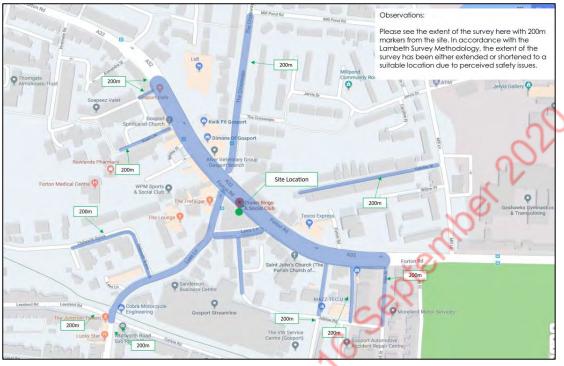
Existing On-Street Parking Demand

- 4.6 The existing on-street parking levels, or 'stress', surrounding the development site has been assessed by means of a manual survey in accordance with the 'Lambeth Council Parking Survey Guidance Note' (Lambeth Council, 2009).
- 4.7 Lambeth Council's parking survey methodology is broadly accepted across Greater London and involve overnight parking observation beat(s) between the hours of 00:30 and 05:30 hours, across two separate weeknights. This is intended to capture the maximum residential parking demand within a 200-metre radius of the identified site.
  - 8 The local parking network is considered to be 'stressed' when on-street occupancy exceeds 85% capacity.
- 4.9 GBC raised a concern in relation to the parking surveys being undertaken within the school holiday period. This was raised by GBC due to an error within the previous Transport Scoping Statement, which stated that surveys were undertaken in August 2019, when in fact they were undertaken in September 2019.



- 4.10 In accordance with the above guidance, parking surveys were undertaken on Tuesday 10<sup>th</sup> September 2019 at 01:00 hours and Wednesday 11<sup>th</sup> September 2019 at 01:00 hours. This was undertaken outside of the school holiday period and therefore in accordance with the Lambeth guidance.
- 4.11 The Lambeth methodology requires 200-metre distance from an identified location to be surveyed. Where the 200-metre boundary occurs part-way along a street, the survey area should be shortened or extended to the nearest junction.
- 4.12 The survey area has been designed to extend 200 metres from the site, with the 200-metre radius Jcomprising the following roads:
  - Forton Road;
  - The Crossways;
  - Reed's Place;
  - Alma Street;
  - Cobden Street:
  - Lees Lane;
  - Chilworth Grove;
  - St John's Close;
  - Moreland Road;
  - Elm Grove; and
  - Park Street. •
- The above roads in the immediate vicinity of the site are shown in Figure 2. 4.13 u to to the total of total o





#### Figure 2: Parking Survey Area

4.14 The number of existing parking spaces in the survey area were identified as part of the analysis. For the purposes of calculating parking stress as defined by the guidance document, it is assumed that each vehicle takes up an average kerb space of 5 metres. Therefore, where parking bays are not physically marked out, lengths of kerb space were measured and split into increments of 5 metres. Physical bays have been divided into 5 metre intervals and rounded down to the nearest whole number to calculate the capacity of each space. Any spaces or lengths of kerb shorter than 5 metres, along with crossovers, have been eliminated from the available kerb space, in accordance with guidance.

#### Survey Results

- 4.15 All survey results are included for reference at Appendix D. Across the assessment area there are an equivalent of 122 unrestricted bays (excluding dropped kerbs, double yellow lines, pedestrian crossings etc.). There are also 11 blue badge bays within the study area.
- 4.16 In terms of car parking occupancy overnight, the results are set out in full within Table 4.2 for the Tuesday 10th September 2019 survey and Table 4.3 for the Wednesday 11th September 2019 survey.

	Street	Unr	estricted	Bays	Blue Badge Bays			Total		
	Name	Spaces	Used	Occupancy	Spaces	Used	Occupancy	Spaces	Used	Occupancy
on	The Crossways	20	11	55%	6	1	16%	26	12	46%
	Reed's Place	9	9	100%	-	-	-	9	9	100%
	Alma Street	2	2	100%	-	-	-	2	2	100%
SUF	Cobden Street	51	45	88%	2	2	100%	53	47	89%
-)	Lees Lane	4	3	75%	-	-	-	4	3	75%
	Chilworth Grove	12	4	33%	3	0	0%	15	4	27%
	St John's Close	8	2	25%	-	-	-	8	2	25%



Moreland Road	2	2	100%	-	-	_	2	2	100%
Park Street	14	14	10%	-	-	-	14	14	100%
TOTAL	122	92	75%	11	3	27%	133	95	71%

Table 4.2: Summary of Parking Stress Survey – Tuesday 10th September 2019

# 4.17 Table 4.2 indicates that there were 30 unrestricted spaces and eight blue badge bays available in the local area during the first overnight survey period. This equates to an overall occupancy of 71%.

Church	Unr	estricted	Bave	Blu	e Badge	Bave	Total			
Street Name	Spaces	Used	Occupancy	Spaces	Used	Occupancy	Spaces	Used	Occupancy	
The Crossways	20	14	70%	6	1	16%	26	15	58%	
Reed's Place	9	9	100%	-	-	-	9	9	100%	
Alma Street	2	1	50%	-	-	-	2	1	50%	
Cobden Street	51	47	92%	2	2	100%	53	49	92%	
Lees Lane	4	2	50%	-	-	-	4	2	50%	
Chilworth Grove	12	4	33%	3	0	0%	15	4	27%	
St John's Close	8	2	25%	-	-	0	8	2	25%	
Moreland Road	2	2	100%	-	- (		2	2	100%	
Park Street	14	14	100%	-	6	-	14	14	100%	
TOTAL	122	95	78%	11	3	27%	133	98	74%	

Table 4.2: Summary of Parking Stress Survey - Wednesday 11th September 2019

4.18 Table 4.2 indicates that there were 27 unrestricted spaces and eight blue badge bays available in the local area during the second overnight survey period. This equates to an overall occupancy of 74%.

#### Conclusion

- 4.19 The surveys identify that the existing overnight on-street parking occupancy is in the range of 71-74% capacity. This is below the 85% threshold where networks are considered 'stressed'.
- 4.20 The above must be considered alongside the aforementioned census data assessment, which indicates that in all likelihood the 24 flats will create 13 vehicles, all of which can be accommodated on-site. In addition, due to the location of the site it is considered that residents will have little need to own a car. As such, it is unlikely that the proposal will result in any increase to parking occupancy on-street, however, in the unlikely event of overspill car parking, it is clear that this could be accommodated on-street.
- 4.21 The introduction of the proposed vehicle crossover will result in the removal of two on-street parking bays. This will result in two vehicles potentially being displaced elsewhere. However, it is understood that the parking bays in question were mainly used by members of the bingo hall and therefore the demand will have disappeared. Alternatively, any use of these spaces would likely be displaced to the nearby public car park, which is unlikely to lead to capacity issues as demand at that car park will have been reduced as a consequence of the bingo hall closing.
- .22 It is also noteworthy that the evening bingo sessions would coincide with high demand for residential parking. The closure of the bingo hall will have removed approximately 75 parked vehicles from the network (both on-street and within local car parks). This will create capacity on-street and within local car parks for residential parking, as well as any visitor parking associated with the development.



4.23 In summary, considering the site is situated within an accessible location on the edge of Gosport town centre, and access on-foot, by cycle and via public transport is good, the proposed parking provision is ethomicsion made to council on the sentenment of considered appropriate in this location. The proposed flats are unlikely to result in any on-street parking impact, particularly as car ownership levels are expected to be low.



# 5.0 Trip Generation

#### Overview

- 5.1 This section sets out the impact of the development proposals on the highway network. The assessment focuses on the weekday morning and evening hours of 08:00-09:00 and 17:00-18:00, which constitutes the key trip generation periods for residential development. Consideration is also given to daily trips.
- 5.2 The bingo hall was the last legal use at the site and therefore could resume operation. As such, a comparison has been made between the former bingo hall and the proposed flats.

Previous Traffic Movements

- 5.3 The trip generation potential for the former bingo hall has been assessed based on trip rates derived from the TRICS database using the category '07 Leisure: H Bingo Hall'. Sites located within England excluding Greater London in town centre locations were selected.
- 5.4 Table 5.1 below provides a summary of the trip rates extracted from TRICS and anticipated vehicle movements linked with the former use. The full TRICS output is included at Appendix E.

Mode of Travel	Weekday AM Peak (08:00-09:00)		J	<sup>,</sup> PM Peak -18:00)	Weekday Daily Movements	
	Arr	Dep	Arr	Dep	Arr	Dep
Vehicular Trip Rates	0.000	0.000	0.028	0.037	0.377	0.375
Vehicular Trips	-	-	22	30	302	300

Table 5.1: Trip Rates and Traffic Generation for 800 Bingo Seats

5.5 Table 5.1 indicates that the bingo hall could have generated 52 vehicular trips in the weekday evening peak period. Over an average weekday, the bingo hall could have generated 602 two-way vehicular trips.

Proposed Traffic Movements

- 5.6 The trip generation potential for the proposed 24 flats has been assessed based on trip rates derived from the TRICS database using the category '03 Residential: C Flats Privately Owned'. Sites located within England excluding Greater London in edge of town centre locations were selected.
- 5.7 Table 5.2 below provides a summary of the trip rates extracted from TRICS and anticipated vehicle movements linked with the proposed flats. The full TRICS output is included at Appendix F.

Mode of Travel		AM Peak -09:00)	J	PM Peak -18:00)	Weekday Daily Movements		
$\cdot$	Arr	Dep	Arr	Dep	Arr	Dep	
Vehicular Trip Rates	0.050	0.179	0.170	0.090	1.136	1.169	
Vehicular Trips	1	4	4	2	27	28	

Table 5.2: Trip Rates and Traffic Generation for 24 Flats

Table 5.2 indicates that the proposed 24 flats could generate five vehicular trips in the weekday morning peak period and six vehicular trips in the weekday evening peak periods Over an average weekday, the proposed flats could generate 55 two-way vehicular trips.

### Net Impact

5.9 Table 5.3 below summarises the net impact of the proposal in terms of vehicle trips.



Mode of Travel	Weekday AM Peak (08:00-09:00)			<sup>,</sup> PM Peak -18:00)	Weekday Daily Movements		
	Arr	Dep	Arr	Dep	Arr	Dep	
Former Vehicular Trips	-	-	22	30	302	300	
Proposed Vehicular Trips	1	4	4	2	27	28	
Net I mpact	+ 1	+ 4	-18	-28	-275	-272	

Table 5.3: Net Impact of the Proposed Development in terms of Vehicular Trips

reprint of the second of the s It is clear from the above assessment that the proposal will result in a negligible increase in vehicular trips to the site in the weekday morning peak, and a significant reduction in vehicular trips during the

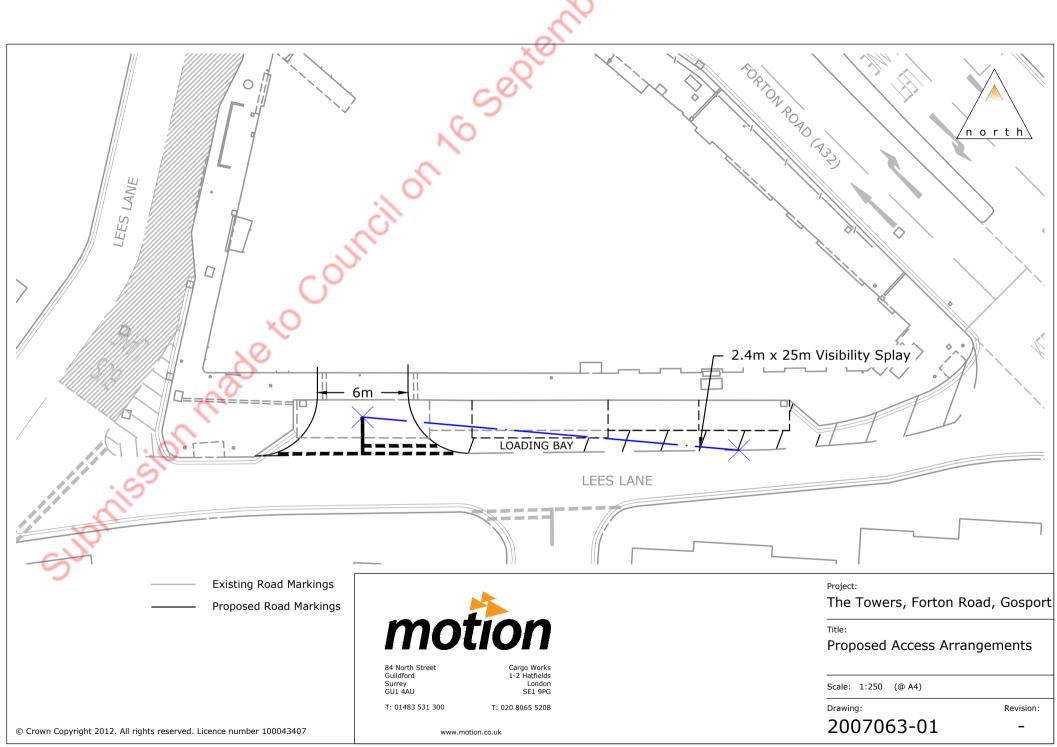


# 6.0 Summary and Conclusion

- 6.1 This Transport Scoping Report has been prepared on behalf of Peter Arnett Leisure in connection with a pre-application submission to Hampshire County Council (HCC) in respect of a proposed residential development located at 4-5 The Towers, Forton Road, Gosport. The proposals seek planning permission for the demolition of the existing building and the erection of 24 flats.
- 6.2 The concerns raised by GBC as part of the previous pre-app scheme have been addressed throughout Transport Scoping Report. A summary of key findings and GBC's concerns which have been addressed are as follows:
  - Safe and suitable provision can be made for access and servicing in accordance with relevant guidance and standards. The proposed access is 6 metres in width enabling two cars to pass at all times;
  - Appropriate visibility splays from the proposed access can be provided in accordance with MfS for a 20mph road;
  - Cycle parking will be provided in accordance with GBC standards and accessible for all;
  - Considering the site is situated within an accessible location on the edge of Gosport town centre, and access on-foot, by cycle and via public transport is good, at least 15 parking spaces is considered appropriate in this location;
  - Census data suggests that the proposals could have a parking demand of 13 vehicles based on car ownership levels within the local area. As the proposals will include at least 15 parking spaces this demand can be accommodated on-site;
  - The Lambeth parking surveys were undertaken outside of the school holiday period and identify that the existing overnight on-street parking occupancy is in the range of 71-74% capacity. This is below the 85% threshold where networks are considered 'stressed';
  - The closure of the bingo hall will have removed approximately 75 parked vehicles from the network (both on-street and within local car parks). This will create capacity on-street and within local car parks for any visitor parking associated with the development;
  - The development is unlikely to result in any material increase to on-street parking demand, as any demand can be accommodated on-site or within local public car parks for visitors; and
  - The proposals are likely to result in a reduction in vehicular movements across an average weekday and as such will not have material impact on the operation of the local transport networks.
- 6.3 Overall, the site is situated within close proximity to local facilities (retail, leisure, education, health, etc.), as well as good public transport services. Therefore, many amenities are accessible via foot, bike or public transport, which limits the demand for car ownership. A such, the number of parking spaces provided is entirely appropriate in this location having regard to planning guidance.
- 6.4 On the basis of the above review, it is concluded that the proposals accord with national and local transport related policies and can be accommodated without detriment to the safety and operating capacity of the local highway network. As such, it is considered that there is no reason why the proposals should be resisted on traffic and transportation grounds.



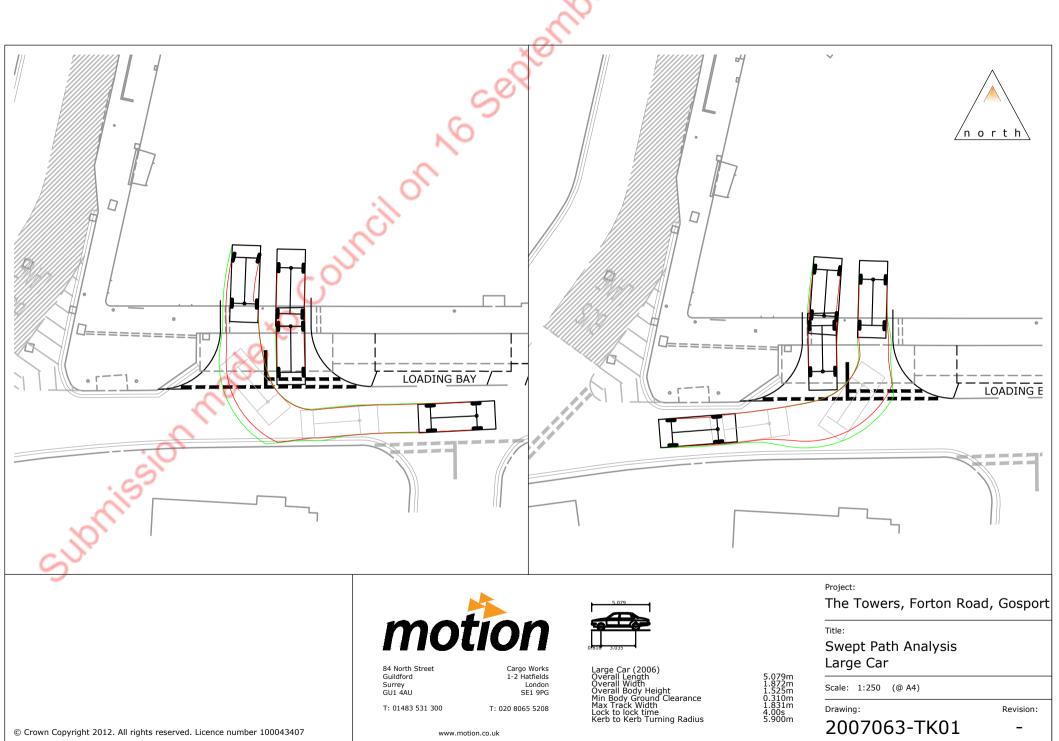
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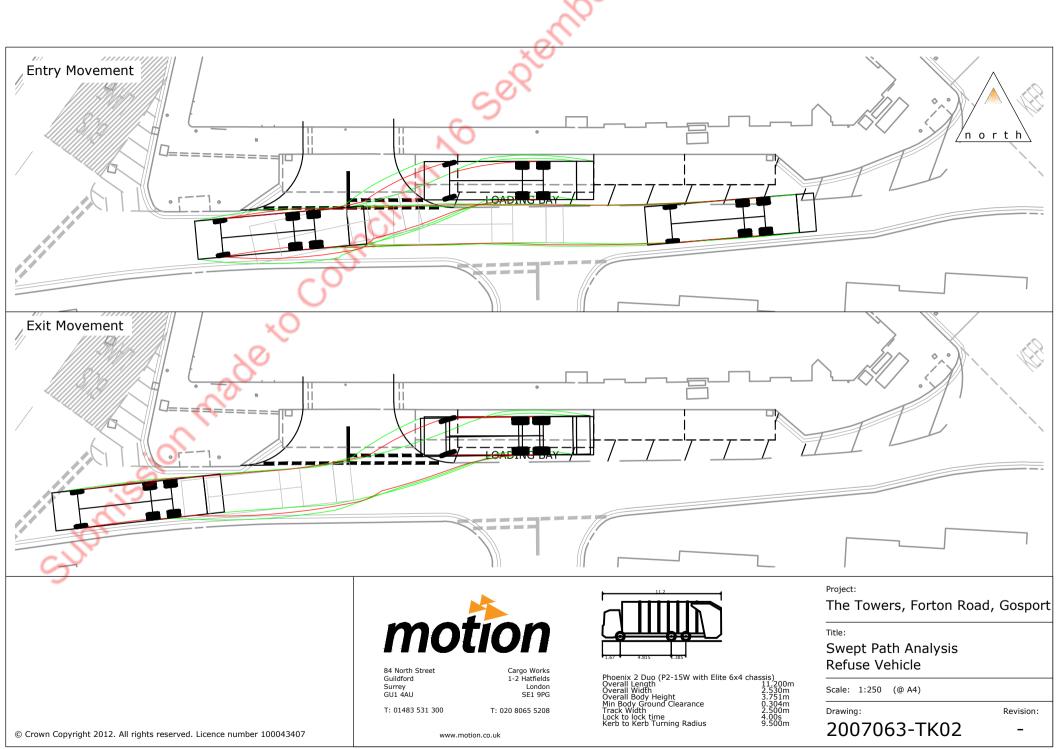


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September 2020 Appendix C

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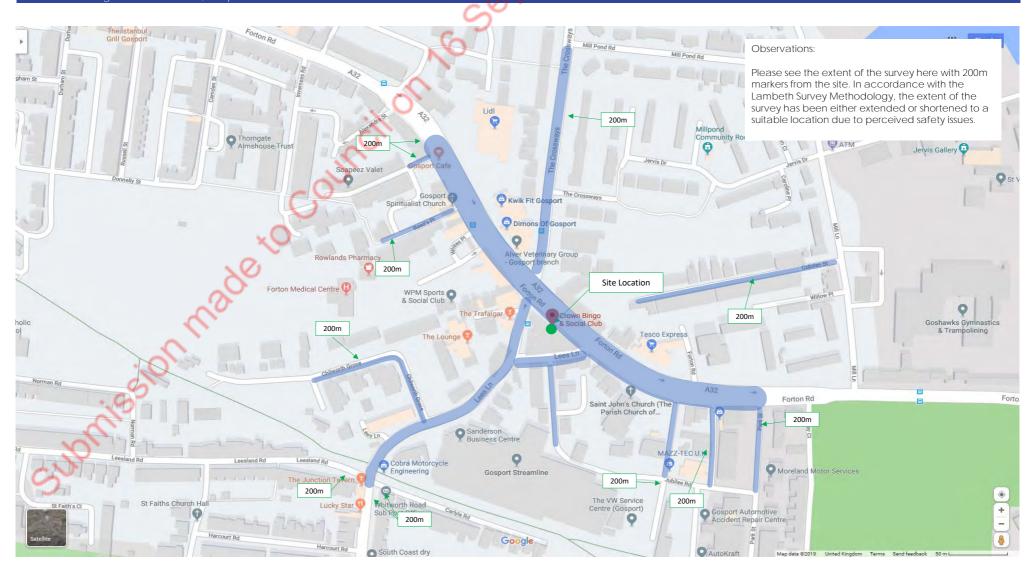
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## OBTRADA

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## DBTRADA

Residential Developments

The Council requires a parking survey to cover the area where residents of a proposed development may want to park. This generally covers an area of 200m (or a 2 minute walk) around a site. For further detail see 'Extent of survey' below.

The survey should be undertaken when the highest number of residents are at home; generally late at night during the week. A snapshot survey between the hours of 0030-0530 should be undertaken on two separate weekday nights (ie. Monday, Tuesday, Wednesday or Thursday).

Common sense should be applied in all cases and the extent of the survey area and justification for any amendments should be included in the survey. If inadequate justification is provided for a survey area then amendments may be required or a recommendation made accordingly.

Observations:

Please see the extent of the survey with 200m markers from the site. In accordance with the Lambeth Survey Methodology, the extent of the survey has been either extended or shortened to a suitable location due to perceived safety issues.

Forton Rd - Parking restriction on bays (ommited from results due to time restrictions) The Crossways - Wide road and footpath either side, however many seem to park on the kerb Reed's PI - Somewhat tight area. Seems that four spaces have been created on the hardstanding and have been included in the results. Alma St Cobden St - Busy residential road with enough space to park either side Lees Ln - 17 bays off road and have been ommited because of this. Chilworth Grove - Available parking on either side however we have restircted the parking to one side as it would make it difficult to pass through. St John's Close - Blocked on southern end Moreland Road -Elm Grove - Not suitable for parking, too narrow. Park St -

## S OBTRADA

### 0016 - Crown Bingo and Social Club, Gosport PO12 3HA

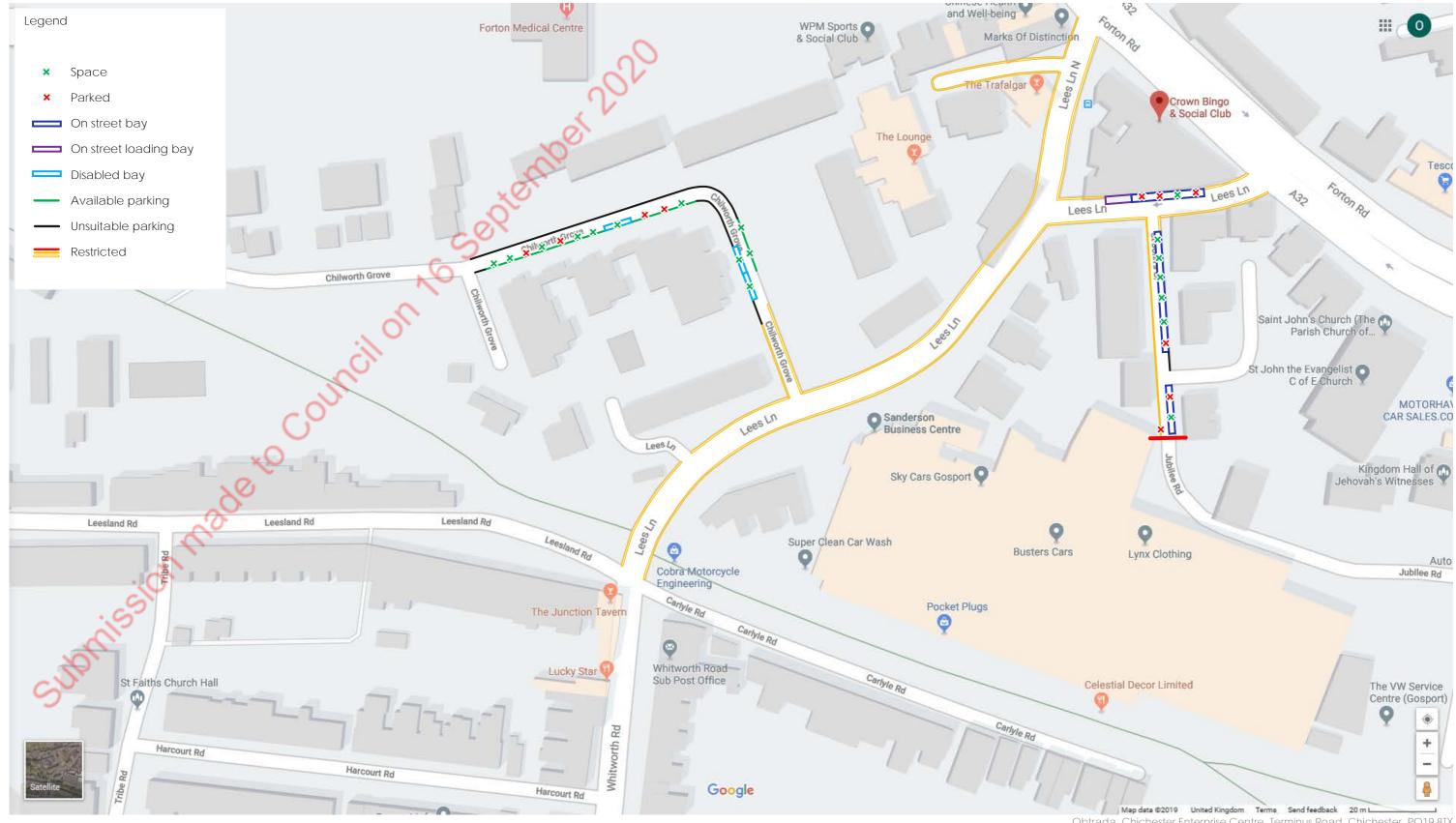
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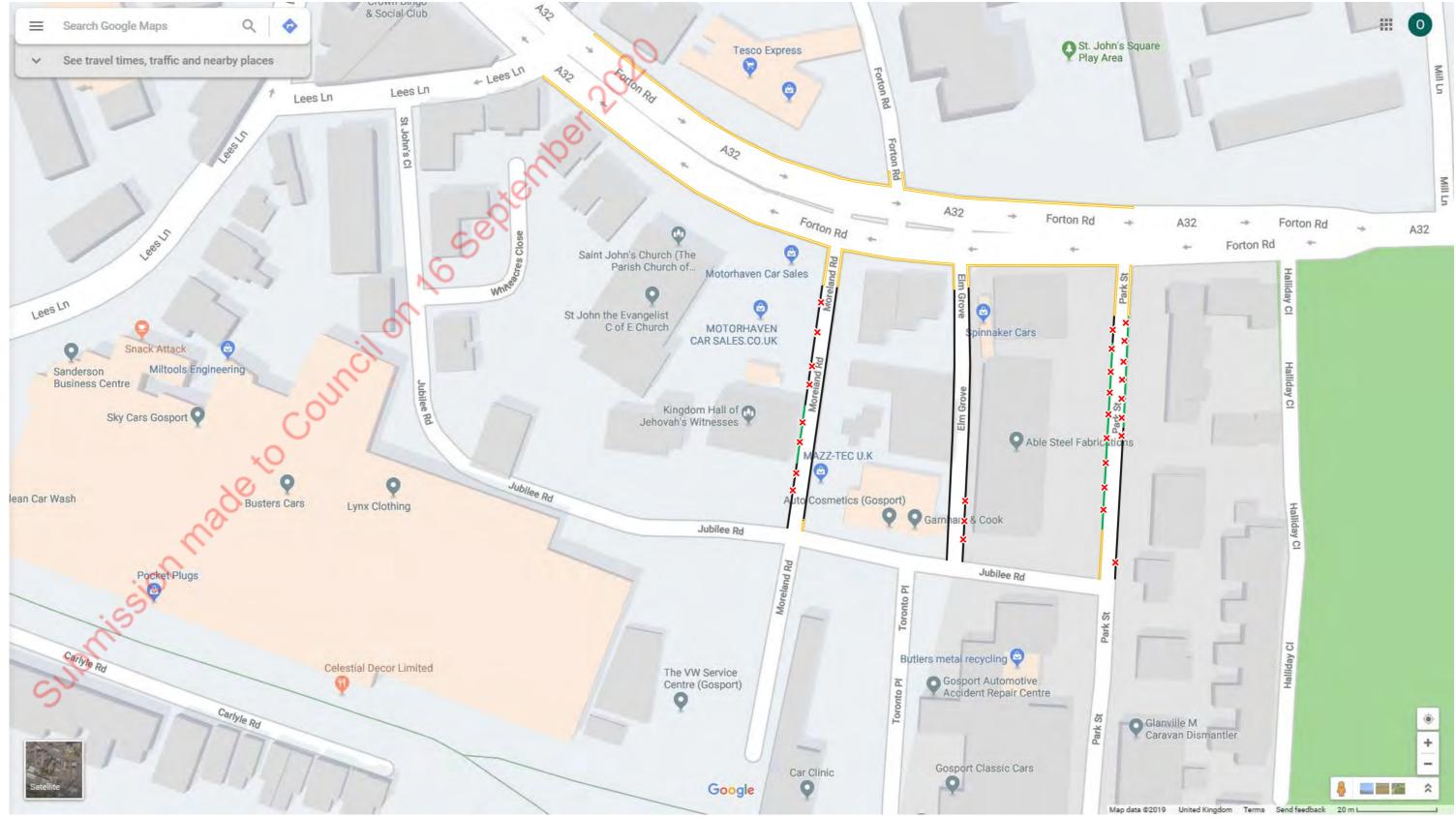
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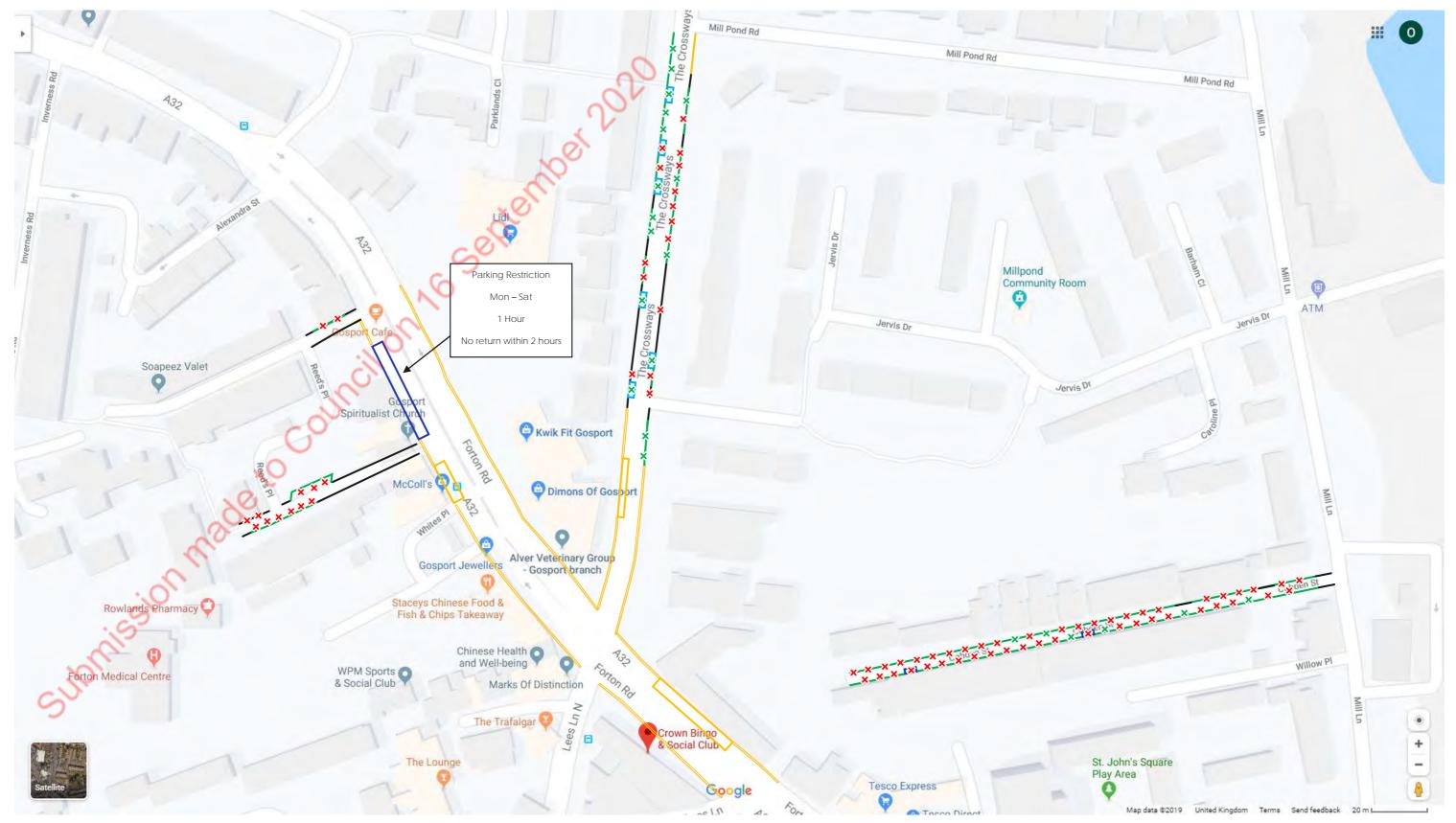
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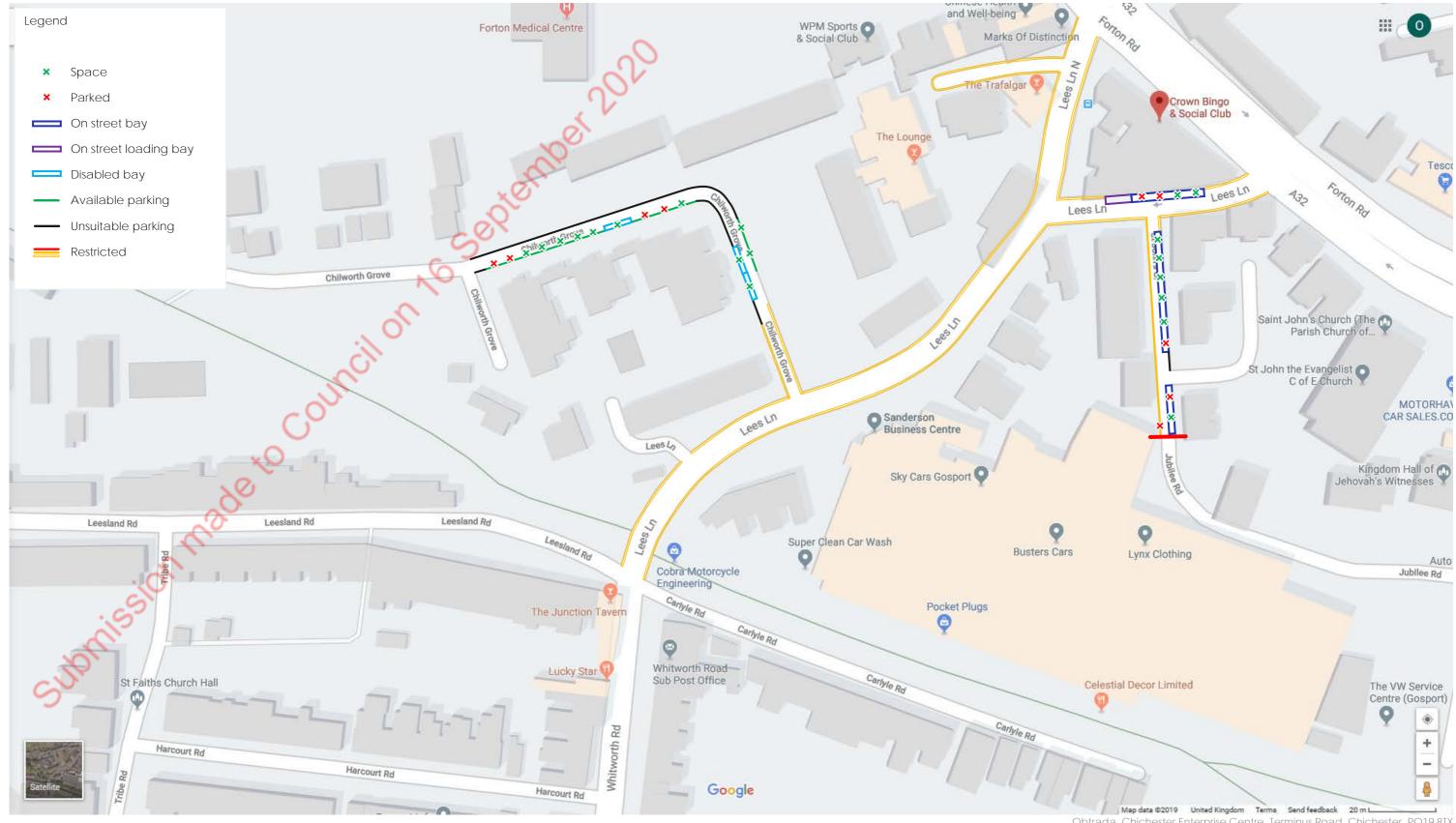
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Forton Rd	0	0					G	×							0	0	N/A										0	0	N/A
The Crossways			14	20		5	~		1	6					15	26	58%					2					17	26	65%
Reed's Pl			9	9		$\mathbf{S}$									9	9	100%					2					11	9	122%
Alma St			1	2	$\sim$	)									1	2	50%										1	2	50%
Cobden St			47	51	$\mathcal{I}$				2	2					49	53	92%										49	53	92%
Lees Ln	2	4		$\sim$											2	4	50%										2	4	50%
Chilworth Grove			4 💙	12						3					4	15	27%										4	15	27%
St John's Close	2	8	0.	-											2	8	25%					1					3	8	38%
Moreland Road		5	2	2											2	2	100%					6					8	2	400%
Elm Grove		$\diamond$	<i>y</i> .												0	0	N/A					3					3	0	N/A
Park St	5	0	14	14											14	14	100%	1				2					17	14	121%
															0	0	N/A										0	0	N/A
															0	0	N/A										0	0	N/A
· • •															0	0	N/A										0	0	N/A
TOTALS	4	12	91	110	0	0	0	0	3	11	0	0	0	0	98	133	73.7%	1	0	0	0	16	0	0	0	0	115	133	86.5%

temp

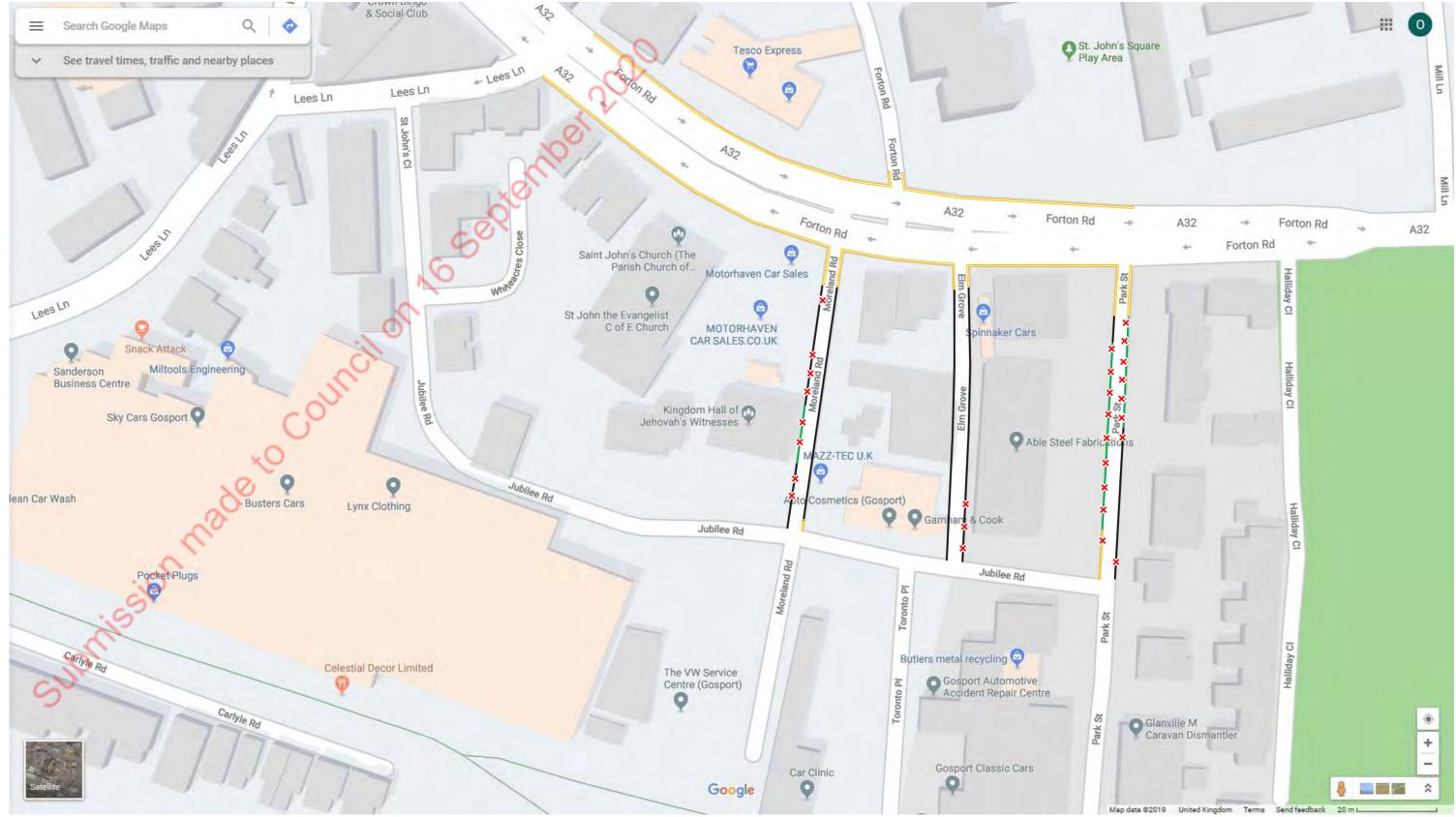
60





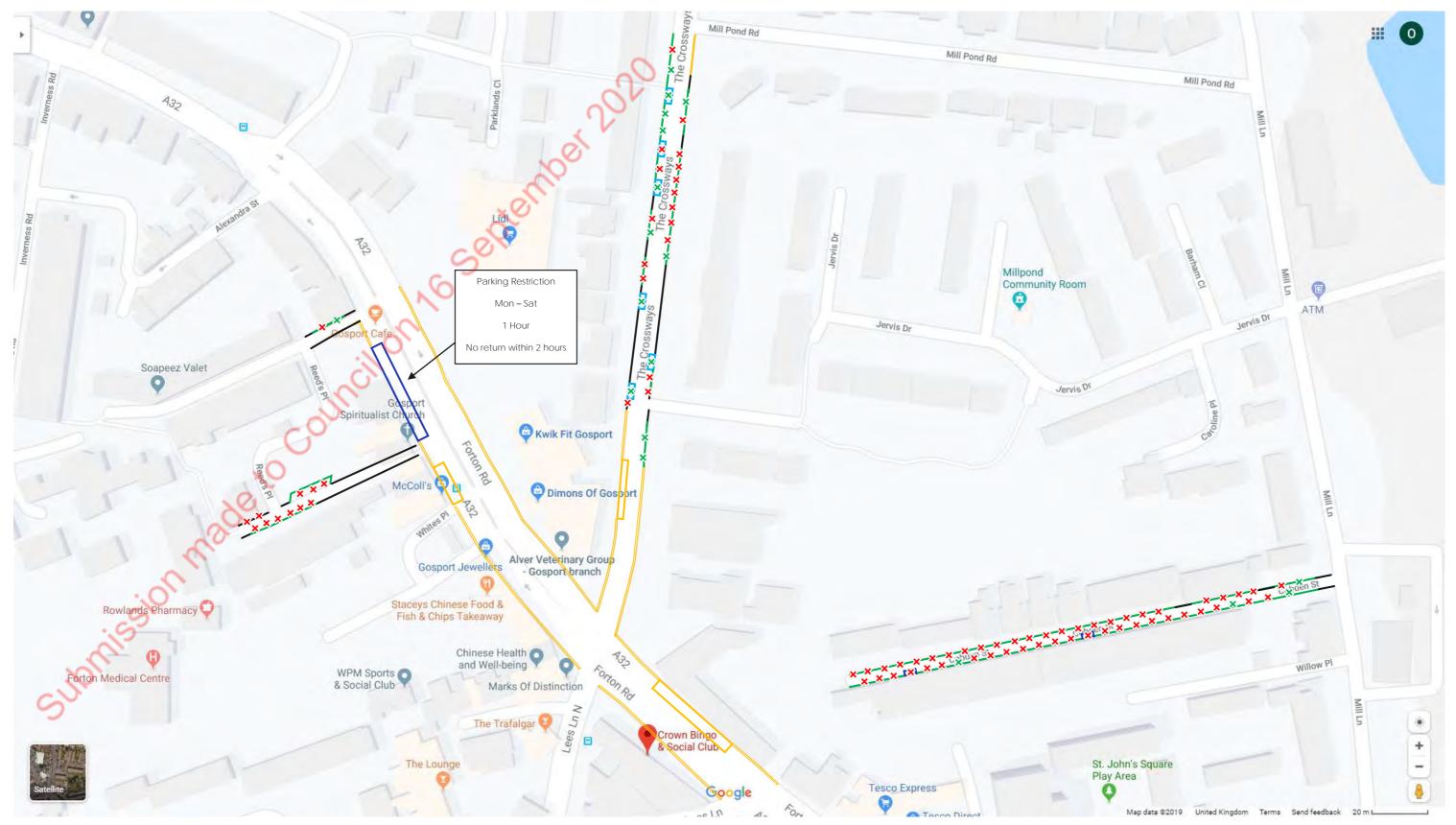
# **OBTRADA**

Obtrada, Chichester Enterprise Centre, Terminus Road, Chichester, PO19 8TX 01243 884630 www.obtrada.co.uk info@obtrada.co.uk



Misp date (#2019 United Kingdom Terms Send Feedback 20 m \_\_\_\_\_\_ Obtrada, Chichester Enterprise Centre, Terminus Road, Chichester, PO19 8TX 01243 884630 www.obtrada.co.uk info@obtrada.co.uk

# OBTRADA



Obtrada, Chichester Enterprise Centre, Terminus Road, Chichester, PO19 8TX 01243 884630 www.obtrada.co.uk info@obtrada.co.uk

# **OBTRADA**



Appendix E TRICS Output - Bingo Hall

7.7.2	250720	B19.45 C	Patabase right of TRICS (	consortium Limited, 2020	). All rights reserved	Monday 10/08/20
Higl	h Street	Guildford				Page 1 Licence No: 734001
5						
ΙP	RATE C	ALCULATI	ON SELECTION PARAM	ETERS:	Calculation Reference: AUI	-11-734001-200810-0852
and ateg		07 - LEISU H - BINGC				
	ICLES	n binot				
,		,				
9	NORTH	ons and area	<u>75.'</u>			
		DURHAM		1 days		
<i>'</i> c 4	section di	isnlavs the	number of survey days p	ar TRICS® sub-region in	n the selected set	0
1110 0		spicys the i				~
im	any Filto	ring select	tion			2V
1110	aryrnte	ring select				
				and its selected range. C	Only sites that fall within the	p parameter range
e In	ICTUAEA II.	i ine trip ra	te calculation.			o l
	neter:		Number of seats		×	V S
	l Range: e Selecter	d by User:	320 to 320 (units: ) 320 to 2140 (units: )			A
rkir	ng Spaces	s Range:	All Surveys Included		XOT	
blic	<u>. Tr</u> anspo	rt Provision	<u>:</u>		O~	
lect	tion by:		-	Include all surve	ys 👝 💽	
te	Range:	01/0	1/12 to 23/11/12		5	
	2				6	
		lays the ran e trip rate ca		ted. Only surveys that w	ere conducted within this da	ate range are
				<u>^</u>		
	ted surve	<u>?y days:</u>			•	
iday	4			1 days		
is c	data dispi	lays the nui	mber of selected surveys	by day of the week.		
plpr	ted surve	ev tynes:				
nua	al count			1 days		
ect	tional AT(	Count Count		0 days		
nis c	data dispi	lays the nui	mber of manual classified	surveys and the numbe	er of unclassified ATC survey	s, the total adding
o to	the over	all number	of surveys in the selecte		re undertaken using staff, wi	
e Ui	ndertakir	ng using ma	comes.			
	ted Local	tions:		_		
wn	Centre		X	1		
vis c	data dispi	lays the nui	mber of surveys per mail	location category within	n the selected set. The main	location categories
onsi	ist of Free	Standing,	Edge of Town, Suburban	Area, Neighbourhood Ce	entre, Edge of Town Centre,	Town Centre and
τĸ	(nown.		$\sim$			
		tion Sub Ca	tegories:			
Jh S	Street			1		
nis c	data displ	lays the nul	nber of surveys per loca	tion sub-category within	the selected set. The location	on sub-categories
nsi	st of Con	nmercial Zoi	ne, Industrial Zone, Devi		tial Zone, Retail Zone, Built-	
! 0	i own, i	ugri Street	and No Sub Category.			
	~					
∋coi	ndary Fi	Itering sel	ection:			
se C	Class:					
D2				1 days		
This /	data disn.	lavs the nu	nber of surveys ner lise	Class classification withir	n the selected set. The Use (	Classes Order 2005
			rpose, which can be four			
Dore	lation	bin 1		-		
	01 to 50,0	<u>hin 1 mile:</u> )00		1 days		
-,-0	/ - / -					

This data displays the number of selected surveys within stated 1-mile radii of population.

TRICS	7.7.2 <b>250720 B19.45</b>	Database right of TRICS	Consortium Limited, 2020. All rights reserved	Monday 10/08/20 Page 2
Motion	High Street Guildfo	ord		Licence No: 734001
	Secondary Filtering	selection (Cont.):		
	<i>Population within 5 min</i> 75,001 to 100,000	<u>les:</u>	1 days	
	This data displays the i	number of selected surveys	s within stated 5-mile radii of population.	
	<i>Car ownership within 5</i> 0.5 or Less	<u>miles:</u>	1 days	
		number of selected surveys les of selected survey sites.	s within stated ranges of average cars owned p	oer residential dwelling,
	<u>Travel Plan:</u> No		1 days	022
			he selected set that were undertaken at sites at sites without Travel Plans.	
	<u>PTAL Rating:</u> No PTAL Present		1 days	No
	This data displays the i	number of selected surveys	s with PTAL Ratings.	
		×0	at sites without Travel Plans. 1 days 5 with PTAL Ratings.	
	Submissi	onmade		

TRICS	7.7.2	250720	B19.45	Database right o	of TRICS Co	onsortium Limi	ted, 2020. A	All rights reserved	Monday 10/08/20
Motion	Hig	h Street	Guildfo	ord					Page 3 Licence No: 734001
	<u>LIST</u>	OF SITES	relevant	to selection para	enters				
	1	DH-07-I York Ro Hartlef	DAD	BINGO			[	DURHAM	
		Town Ce High Stro	eet			220			
		ی Total Nu		seats: <i>hte: FRIDAY</i>		320 <i>23/11/12</i>		Survey Type: MANUAL	
	uniqu	ue site ret	erence cu	nde and site addro	ess, the se ther the sui	lected trip rate	calculation nual classifi	r each individual survey site parameter and its value, th ed count or an ATC count.	e day of the
	3	Jon	ISSI	made	×0 2	ounci	Ň		

Motion High Street Guildford

Page 4 Licence No: 734001

#### TRIP RATE for Land Use 07 - LEISURE/H - BINGO HALLS VEHICLES Calculation factor: 1 SEATS BOLD print indicates peak (busiest) period

		ARRIVALS		[	DEPARTURES	5	TOTALS				
	No.	Ave.	Trip	No.	Ave.	Trip	No.	Ave.	Trip		
Time Range	Days	SEATS	Rate	Days	SEATS	Rate	Days	SEATS	Rate		
00:00 - 01:00											
01:00 - 02:00											
02:00 - 03:00											
03:00 - 04:00									$\frown$		
04:00 - 05:00											
05:00 - 06:00											
06:00 - 07:00								C	$\mathbf{V}$		
07:00 - 08:00								$\sim$	<u> </u>		
08:00 - 09:00								·	•		
09:00 - 10:00								1 1 V			
10:00 - 11:00	1	320	0.016	1	320	0.006	1	320	0.022		
11:00 - 12:00	1	320	0.019	1	320	0.016	1	220	0.035		
12:00 - 13:00	1	320	0.022	1	320	0.016	1	320	0.038		
13:00 - 14:00	1	320	0.019	1	320	0.013	1	320	0.032		
14:00 - 15:00	1	320	0.016	1	320	0.019	1	320	0.035		
15:00 - 16:00	1	320	0.047	1	320	0.059	.01	320	0.106		
16:00 - 17:00	1	320	0.006	1	320	0.000	1	320	0.006		
17:00 - 18:00	1	320	0.028	1	320	0.037		320	0.065		
18:00 - 19:00	1	320	0.119	1	320	0.066	1	320	0.185		
19:00 - 20:00	1	320	0.006	1	320	0.003	1	320	0.009		
20:00 - 21:00	1	320	0.066	1	320	0.100	1	320	0.166		
21:00 - 22:00	1	320	0.013	1	320	0.034	1	320	0.047		
22:00 - 23:00	1	320	0.000	1	320	0.006	1	320	0.006		
23:00 - 24:00	1	320	0.000	1	320	0.000	1	320	0.000		
Total Rates:			0.377		~	0.375			0.752		

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

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#### Parameter summary

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Trip rate parameter range selected:	320 - 320 (units: )
Survey date date range:	01/01/12 - 23/11/12
Number of weekdays (Monday-Friday):	1
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.



submission made to

per 20'

Motion High Street Guildford

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL Category : C - FLATS PRIVATELY OWNED VEHICLES

#### Selected regions and areas:

SOUT	HEAST	
BD	BEDFORDSHIRE	3 days
EX	ESSEX	2 days
HC	HAMPSHIRE	1 days
HF	HERTFORDSHIRE	1 days
SOUTI	H WEST	
DV	DEVON	1 days
EAST	ANGLIA	
NF	NORFOLK	1 days
SF	SUFFOLK	1 days
WEST	MIDLANDS	
WM	WEST MIDLANDS	1 days
	BD EX HC HF SOUTI DV EAST NF SF WEST	EX ESSEX HC HAMPSHIRE HF HERTFORDSHIRE SOUTH WEST DV DEVON EAST ANGLI A NF NORFOLK SF SUFFOLK WEST MI DLANDS

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter:	No of Dwellings
Actual Range:	6 to 175 (units: )
Range Selected by User:	6 to 215 (units: )

Parking Spaces Range: All Surveys Included

Parking Spaces per Dwelling Range: All Surveys Included

Bedrooms per Dwelling Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision: Selection by:

Date Range: 01/01/12 to 18/11/19

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Include all surveys

<u>Selected survey days:</u>		
Monday		1 days
Tuesday	20	6 days
Thursday		3 days
Friday		1 days
	$\mathbf{A}$	

This data displays the number of selected surveys by day of the week.

0

Selected survey types:	
Manual count	11 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaking using machines.

Selected Locations: Edge of Town Centre

11

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:	
Residential Zone	6
Built-Up Zone	4
No Sub Category	1

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

57.7.2 25072		right of TRICS Consortium Limited, 2020. All rights reserv	ved Friday 07/08/2 Page
n High Stree	et Guildford		Licence No: 73400
Secondary	Filtering selection:		
<u>Use Class:</u>			
C3		11 days	
		curveys per Use Class classification within the selected set. hich can be found within the Library module of TRICS®.	. The Use Classes Order 2005
<i>Population (</i> 10,001 to 1	<u>vithin 1 mile:</u>	1 dava	
15,001 to 2		1 days 1 days	
25,001 to 5		9 days	0
This data di	splays the number of s	elected surveys within stated 1-mile radii of population.	20
Population v	vithin 5 miles:		~0v
50,001 to 7	'5,000	4 days	
125,001 to 1		4 days	4 V
250,001 to		3 days	Or I
This data di	splays the number of s	elected surveys within stated 5-mile radii of population.	mber 2020
	hip within 5 miles:		di.
0.6 to 1.0		3 days	01
1.1 to 1.5		8 days	
	splays the number of s lius of 5-miles of select	elected surveys within stated ranges of average cars own ted survey sites.	ed per residential dwelling,
Travel Plan:		Č,	
Yes		2 days	
No		9 days	
and the nur	mbor of surveys that w	surveys within the selected set that were undertaken at sig ere undertaken at sites without Travel Plans.	tes with Travel Plans in place,
PTAL Rating	<u>y.</u>	č)	
No PTAL Pre	sent	11 days	
This data di	isplays the number of s	11 days selected surveys with PTAL Ratings.	

	ligh Stree	<u> </u>				Page
<u></u>	5	Guildford				Licence No: 73400
	ST OF SITU	<u>ES relevant to</u>	selection parameters			
1	WING LEIGH LINSLA Edge o Reside	ROAD FON BUZZARD	2	175	BEDFORDSHI RE	
2	STANE	<i>Survey date:</i> -C-02 RIDGE ROAD FON BUZZARD	BLOCKS OF FLATS	15/05/18	<i>Survey Type: MANUAL</i> BEDFORDSHIRE	0
	Reside	f Town Centre ntial Zone lo of Dwellings <i>Survey date:</i>	5:	62 15/05/18	Survey Type: MANUAL	201
3	COURT DUNST	DRIVE	BLOCKS OF FLATS		BEDFORDSHIRE	
4	No Sub Total N DV-03	o Category lo of Dwellings <i>Survey date:</i> -C-01 AY ROAD	5:	146 <i>15/05/18</i>	Survey Type: MANUAL DEVON	
5	Reside Total N EX-03 WESTO SOUTH	LIFF PARADE	5:	27 10/07/17	<i>Survey Type: MANUAL</i> ESSEX	
6	Reside Total N EX-03 WESTO SOUTH WESTO	f Town Centre ntial Zone lo of Dwellings <i>Survey date:</i> -C-02 CLIFF PARADE IEND-ON-SEA	S: <i>TUESDAY</i> BLOCK OF FLATS	6 22/10/13	<i>Survey Type: MANUAL</i> ESSEX	
7	Reside Total N HC-03 CROSS	ntial Zone lo of Dwellings <i>Survey date:</i>		94 <i>22/10/13</i>	<i>Survey Type: MANUAL</i> HAMPSHI RE	
8	Built-U Total N HF-O3 SHENL	f Town Centre p Zone lo of Dwellings <i>Survey date:</i> -C-O3 EY ROAD IAMWOOD	5:	90 <i>05/06/18</i>	<i>Survey Type: MANUAL</i> HERTFORDSHIRE	
c	Built-U	f Town Centre p Zone lo of Dwellings <i>Survey date:</i>	5:	91 <i>14/11/19</i>	Survey Type: MANUAL	

TRICS	7.7.2	250720 B19.45 Dat	tabase right of TRICS Co	nsortium Limited, 2020	All rights reserved	Friday 07/08/20 Page 4
Motion	Hig	h Street Guildford				Licence No: 734001
	LIST	OF SITES relevant to s	selection parameters (Co	<u>nt.)</u>		
	9	NF-03-C-01 PAGE STAIR LANE KING'S LYNN	BLOCKS OF FLATS		NORFOLK	
	10	Edge of Town Centre Built-Up Zone Total No of Dwellings <i>Survey date:</i> SF-03-C-01 STATION HILL BURY ST EDMUNDS		51 <i>11/12/14</i>	<i>Survey Type: MANUAL</i> SUFFOLK	00
	11	Edge of Town Centre Built-Up Zone Total No of Dwellings <i>Survey date:</i> WM-03-C-04 GILLQUART WAY COVENTRY PARKSIDE Edge of Town Centre Residential Zone Total No of Dwellings <i>Survey date:</i>	<i>THURSDAY</i> BLOCKS OF FLATS	85 <i>18/12/14</i> 55 <i>11/11/16</i>	Survey Type: MANUAL WEST MIDLANDS	201

sisting of the second s This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

#### Licence No: 734001

#### TRIP RATE for Land Use 03 - RESIDENTIAL/C - FLATS PRIVATELY OWNED VEHICLES Calculation factor: 1 DWELLS BOLD print indicates peak (busiest) period

	ARRIVALS		DEPARTURES			TOTALS			
	No.	Ave.	Trip	No.	Ave.	Trip	No.	Ave.	Trip
Time Range	Days	DWELLS	Rate	Days	DWELLS	Rate	Days	DWELLS	Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									$\sim$
04:00 - 05:00									$\sim$
05:00 - 06:00									1
06:00 - 07:00								C	V
07:00 - 08:00	11	80	0.042	11	80	0.152	11	80	0.194
08:00 - 09:00	11	80	0.050	11	80	0.179	11	80	0.229
09:00 - 10:00	11	80	0.061	11	80	0.077	11	🧹 80	0.138
10:00 - 11:00	11	80	0.071	11	80	0.090	11	<u> </u>	0.161
11:00 - 12:00	11	80	0.071	11	80	0.083	11	<u> </u>	0.154
12:00 - 13:00	11	80	0.111	11	80	0.100	11	80	0.211
13:00 - 14:00	11	80	0.083	11	80	0.091	11	80	0.174
14:00 - 15:00	11	80	0.073	11	80	0.074	11	80	0.147
15:00 - 16:00	11	80	0.083	11	80	0.068		80	0.151
16:00 - 17:00	11	80	0.126	11	80	0.071	11	80	0.197
17:00 - 18:00	11	80	0.170	11	80	0.090	11	80	0.260
18:00 - 19:00	11	80	0.195	11	80	0.094	11	80	0.289
19:00 - 20:00						Cas			
20:00 - 21:00									
21:00 - 22:00						Co			
22:00 - 23:00					1				
23:00 - 24:00									
Total Rates:			1.136		_	1.169			2.305

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

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#### Parameter summary

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Trip rate parameter range selected:	6 - 175 (units: )
Survey date date range:	01/01/12 - 18/11/19
Number of weekdays (Monday-Friday):	11
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.



Hampshire County Council Pre-Application Response

Geotestande Enc' Council Pre-Appli unphire C



Economy, Transport and Environment Department Elizabeth II Court West, The Castle Winchester, Hampshire SO23 8UD

Tel:	0300	555	1375	(General Enquiries)
	0300	555	1388	(Roads and Transport)
	0300	555	1389	(Recycling Waste & Planning)
Textp	hone	0300	) 555	1390
Fax 0	1962	8470	55	$\sim$

www.hants.gov.uk

My reference

Fmail

Your reference

Fraser.spinney@hants.gov.uk

Enquiries to Fraser Spinney

Direct Line 01962 845103

Date 14/09/2020

### For attention of Phil Bell

Dear Sir,

### 4-5 The Towers, Forton Road, Gosport

The following pre-application comments relate to the information submitted in the pre-application Transport Scoping Report dated 17<sup>th</sup> August 2020. The proposals seek planning permission for the demolition of the existing bingo hall building and the erection of 24 flats, of which five will be 1-bed and nineteen will be 2-bed.

### Pedestrian Connectivity

The site is well connected for pedestrians and has good pedestrian links towards local services and amenities, as well as Gosport town centre.

### Sustainable modes

The site has good access to bus services with a bus stop adjacent to the site providing access to Gosport town centre. Any application should provide detail of the bus services available at this bus stop and the frequency of service provided.

### Access

Please find the following comments in relation to the proposals provided:

NB: Comments are based on proposed parking provision. If the number of required spaces increases, then proposed access requirements should also be reassessed.

• The proposed 'vehicle crossover', as stated in the 3.2 of the Transport Scoping Note, appears to be a bellmouth access created by white lining and therefore should be described as such. This has been defined

> Director of Economy, Transport and Environment Stuart Jarvis BSc DipTP FCIHT MRTPI

specifically using conventional access/junction road markings and will necessitate more onerous visibility requirement. If a more conventional crossover detail is proposed, then the designer will be eligible for a reduced 'x' distance of 2.0m in accordance with paragraph 3.7.2 TG3, HCC. *Technical Guidance Note TG3 -Stopping Sight Distances and Visibility Splays:* 

https://documents.hants.gov.uk/highways/TG3TechnicalGuidanceNote-StoppingSightDistancesandVisibilitySplays.pdf

- A conventional access will require measured visibility speeds to determine the 'y' distance of the visibility splay, or, if agreed, a vehicle crossover can use Table 3.7.1 (TG3, HCC) - in accordance with the posted speed limit on Lees Lane.
- (TG3 3.7.3, HCC) Where the proposed access crosses an existing footway/cycleway then inter-visibility from between the driver and any footway users should be provided. This should be measured as 2m x 2m from the back of the footway/verge and be kept clear of any obstruction greater than 600mm in height. Figure 3.5 Pedestrian/Vehicle Intervisibility at Vehicle Crossovers.
- There are existing building downpipes draining directly into the highway drainage system which is not permitted. Alternative drainage proposals will need to be achieved if the development is approved. No private water runoff will be permitted onto the highway.
- Proposed access width of 6.0m is acceptable, but a 2 x 2 inter-vis splay may require a wider overall gap.
- Is the proposed relocation of the 'loading bay' solely for refuse collections?
- A minor works 278 agreement will be required.

### <u>Parking</u>

Parking internal to the site is a matter to be considered by Gosport Borough Council as Local Planning Authority (LPA). However, the applicant is proposing to provide at least 15 unallocated vehicular parking spaces, which is a shortfall of 13 spaces from the Gosport Supplementary Planning Document (2015). Due to the shortfall of parking spaces the applicant has assessed the available parking in the vicinity of the site which could be utilised by residents of the proposed development. This review demonstrates that there is available parking in the surrounding area which residents could use and, as such, HCC would be comfortable that the proposals will not cause parking issues on the public highway. The previous bingo hall use of the site provided no parking and, as mentioned previously, the site is well connected by sustainable modes. Therefore, HCC would raise n objection to the proposed level of parking provided. Regarding cycle parking, Gosport should provide comment on the acceptability of the proposals as LPA.

### Trip generation

In order to obtain a trip generation for the proposed use the applicant utilised the TRICS database. HCC agrees the methodology and inputs into the TRICS database.

This provided an AM two-way trip rate of 0.229 and a PM two-way trip rate of 0.26 which results in 5 vehicular trips in the AM peak and 6 vehicular trips in the PM peak. Due to the nature and location of the site and resultant expected low car ownership, as well as the net trips in the PM peak from the site's previous use, HCC accept this trip rate.

I trust that the above is clear but please contact Fraser Spinney should you need further information.

Yours faithfully,

Fraser Spinney Transport Planner – Highways Development Planning



# The Towers Gosport

10 mm ...... Drawing Information Pack Prepared by LCE architects UK design management consultancy

where the council on the september 2020 LCE architects

Submission by LCE architects UK 164-165 Western Road Brighton, BN1 2BB

United Kingdom tel: +44 (0) 1273 206 710 email: Info@LCEarch.com www.LCEarch.com

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SET BALLE TO 3ND & 4th Fire WITH OPEN BALCONIES ALUWING MASS OF BUILDING To REDUCE Q ME PROMINANT CORNER .

> NEW X3 STOREY BRICK CLAD IKBAN BLOCK WITH WELL PROPORTIGNED OPENIME marte FALADE.

> > SET BACK TO SW CORNEL AMOWING GALDON PLANTICK O GR FIR LOVEL.

GROUND & IM FLOUR FENESTRATION COMBINED TO GIVE A DOUGLE NEIGHT PROPORTION @ GR LAM. + ANON PARKING TO BE Better INTORGRATES on THE STAKET SCOWE.

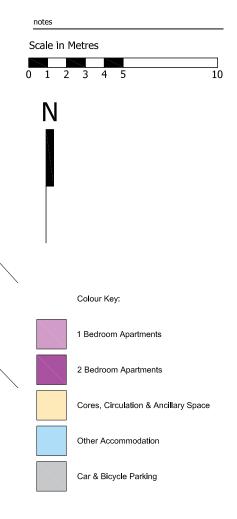
OAST FACING ELEVATIONS To 300 & 4 m FLRS, COMBINED WITH A MARTE TO METAL CLADDING & A STOP BALL IN THE FACADE, THIS ALLOWS THE TOP TO FLOORS TO BE READ

PITCH ROOF GAGLE ENOS to South & North-WIMM THE COOF ZONE. SET BACK & PITCH ROOF TO SETTIN OF 3NO FR TO RESOLE ONE Mass of Scheme ORIGINAL ENTRANCE FACADE TO BINGO MALL RETAINED & NEW ENTRANCE INCORPORATED INTO ME ORIGINAL .

Submission made to council on 16 September 2020







Level 00 - Ground GIA - 715m<sup>2</sup> GEA - 763m<sup>2</sup> Circulation, Cores & Plant Space - 45m<sup>2</sup> Bin store - 44m<sup>2</sup> 15 Vehicle Parking Spaces - 528m<sup>2</sup> 69 Cycle Parking Spaces - 80m<sup>2</sup>

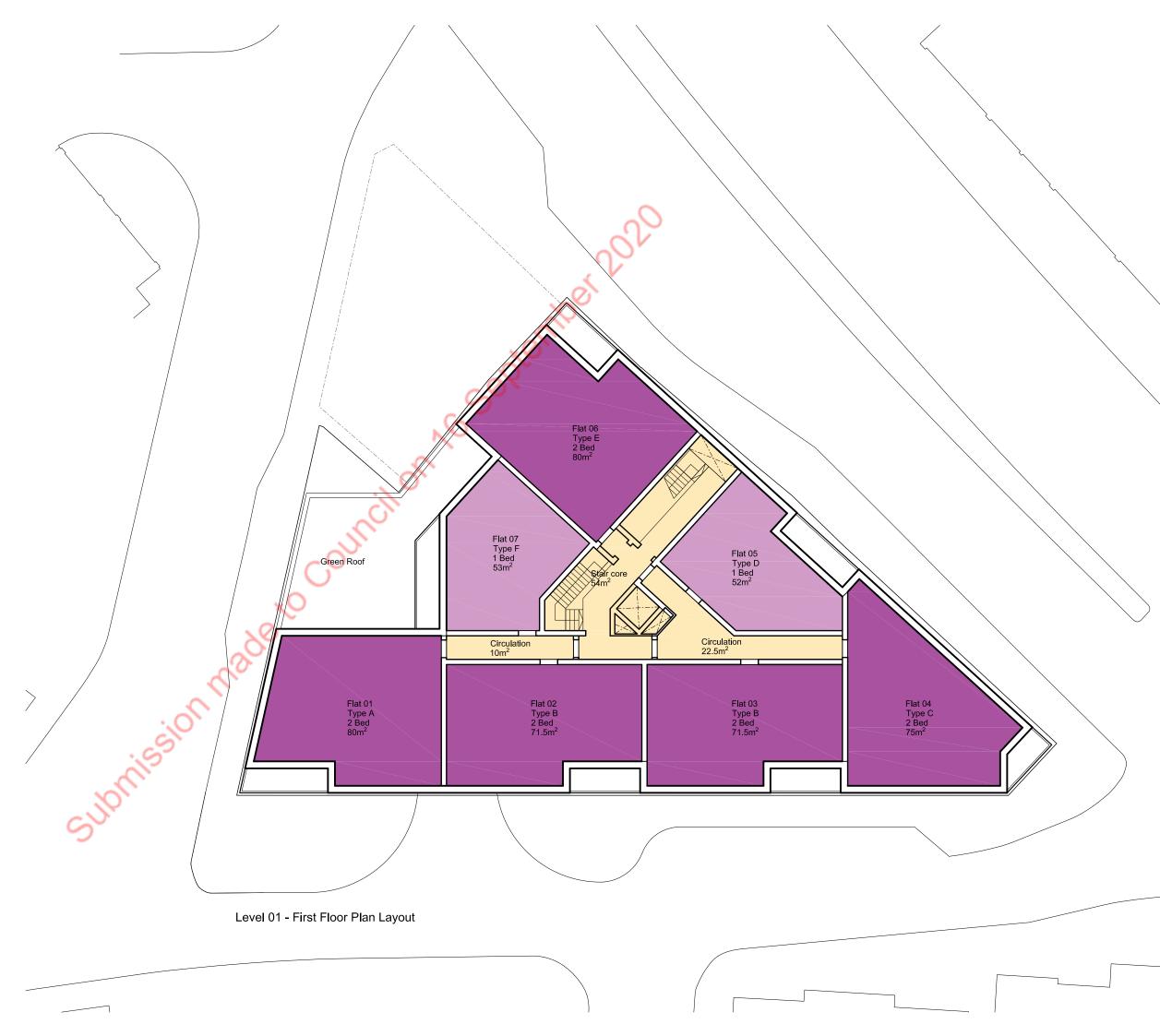
## Pre-App Issue

revision date description

dwn chkd

164-165 Western Road Brighton BN1 2BB T 01273 206710 F 01273 206891 E Info@LCEarch.com W LCEarch.com LCE architects a subsidiary of LCE holdings Ltd ISO 9001:2008 certified

project	scale 1:200@A3	
4-5 The Towers Forton Road, Gosport	date 28.08.20	
client	drawn	
Peter Arnett Leisure	MD	
	checked	
	MG	
drawing		
Ground Floor Area Plan		
drawing number	revision	
20013/SK/010	*	





#### Level 01 - First GIA - 601m² GEA -700m² Circulation, Cores & Ancillary Space - 86.5m² x2 1beds (x2 person) x5 2beds (x4 person)

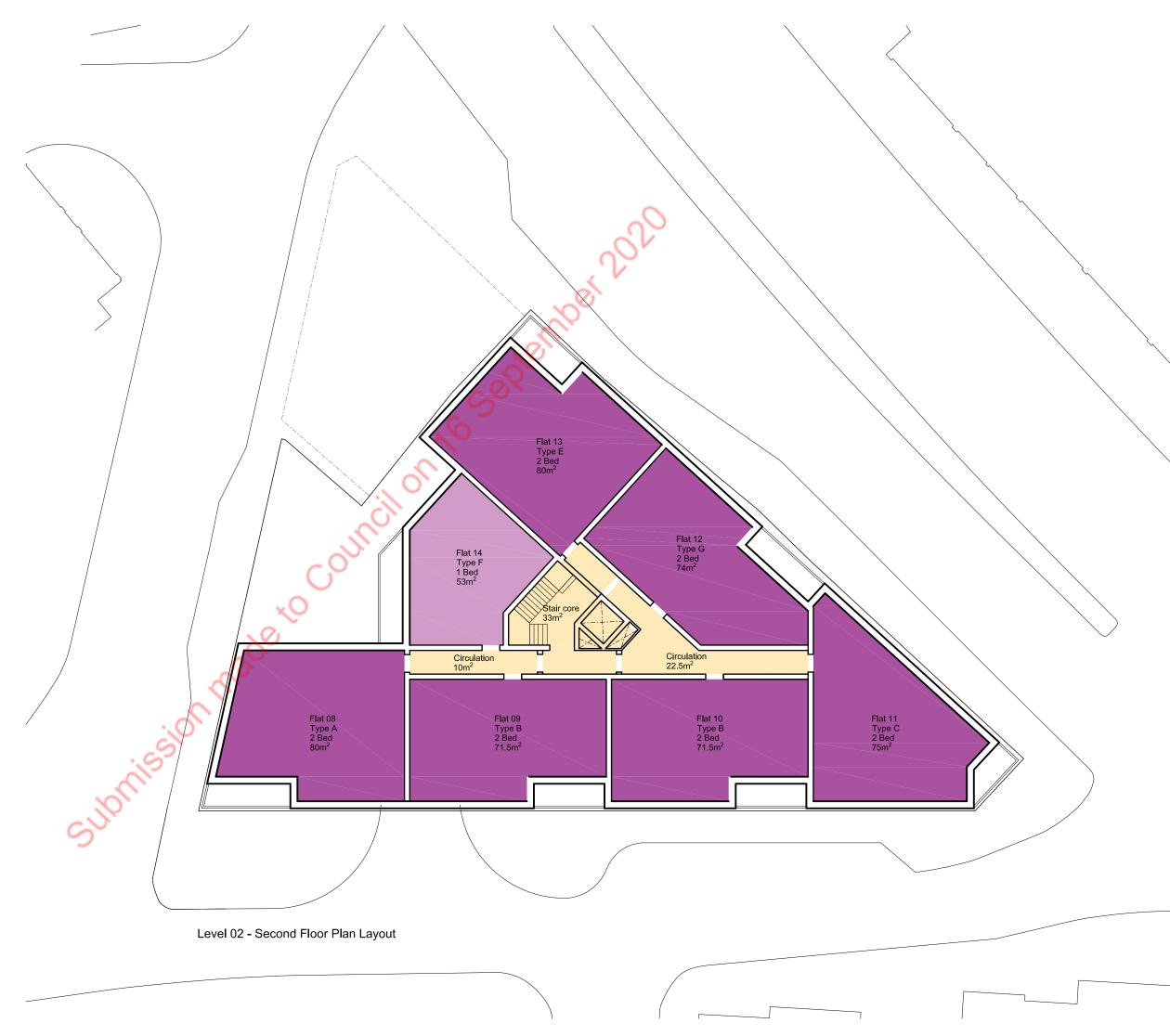
## Pre-App Issue

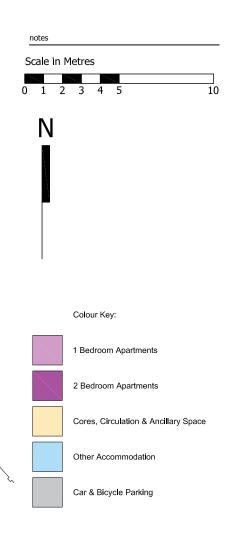
revision date description

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project	scale 1:200@A3
4-5 The Towers Forton Road, Gosport	date 28.08.20
client	drawn
Peter Arnett Leisure	MD
	checked
	MG
drawing	
First Floor Area Plan	
drawing number	revision
20013/SK/011	*





# Level 02 - Second GIA - 601m<sup>2</sup> GEA -700m<sup>2</sup> Circulation, Cores & Ancillary Space - 65.5m<sup>2</sup> x1 1beds (x2 person) x6 2beds (x4 person)

## Pre-App Issue

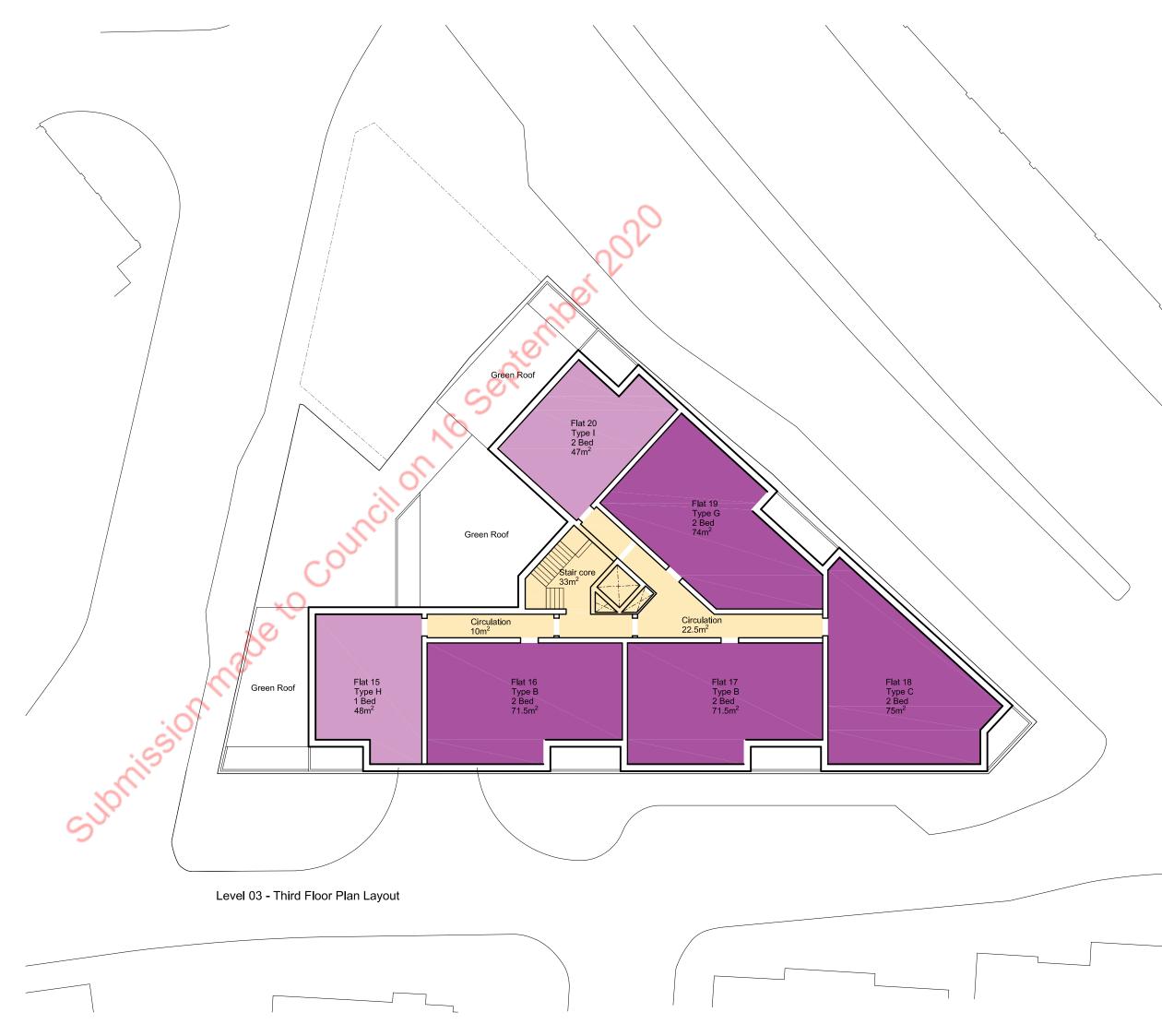
revision date description

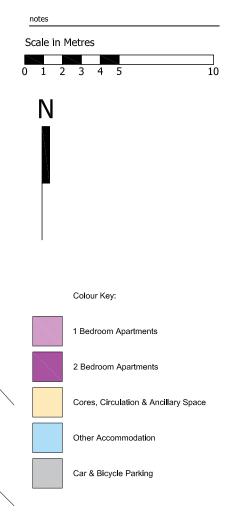
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<sup>project</sup> 4-5 The Towers Forton Road, Gosport	scale 1:200@A3 date 28.08.20
client	drawn
Peter Arnett Leisure	MD
	checked
	MG
drawing	
Second Floor Area Plan	
drawing number	revision
20013/SK/012	*





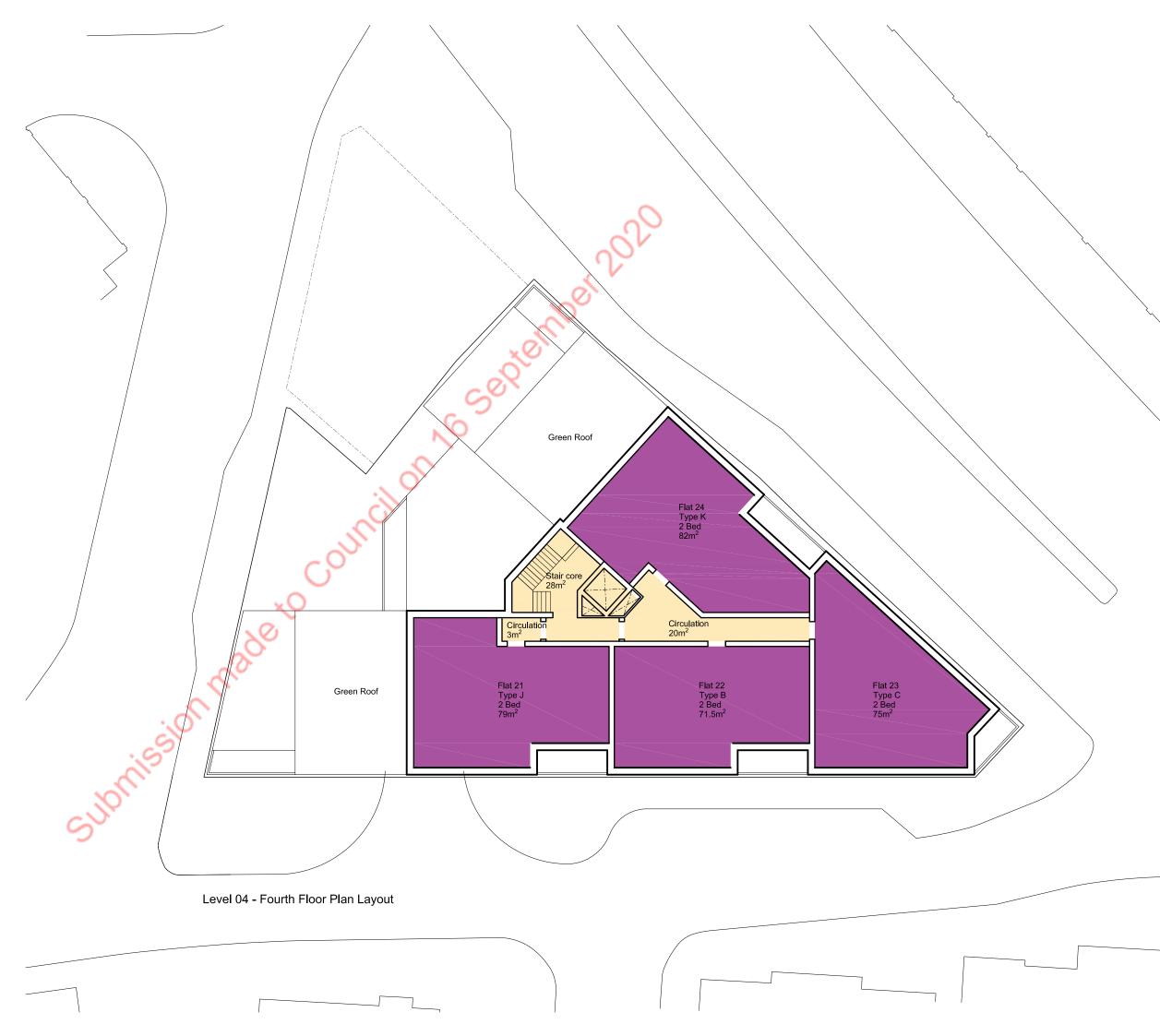
Level 03 - Third GIA - 478m<sup>2</sup> GEA - 560m<sup>2</sup> Circulation, Cores & Ancillary Space - 65.5m<sup>2</sup> x2 1beds (x2 person) x4 2beds (x4 person)

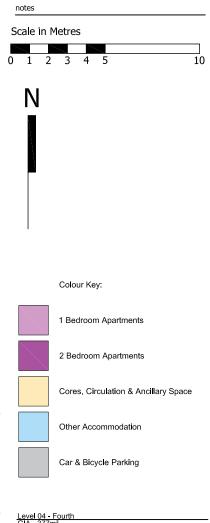
## Pre-App Issue

revision date description

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<sup>project</sup> 4-5 The Towers Forton Road, Gosport	scale 1:200@A3 date 28.08.20
client	drawn
Peter Arnett Leisure	MD
	checked
	MG
drawing	
Third Floor	
Area Plan	
drawing number	revision
20013/SK/013	*





Level 04 - Fourth GIA - 377m<sup>2</sup> GEA -440m<sup>2</sup> Circulation, Cores & Ancillary Space - 51m<sup>2</sup> x4 2beds (x4 person)

## Pre-App Issue

revision date description

.. ... dwn chkd

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project	scale 1:200@A3
4-5 The Towers Forton Road, Gosport	date 28.08.20
client	drawn
Peter Arnett Leisure	MD
	checked
	MG
drawing	
Fourth Floor Area Plan	
drawing number	revision
20013/SK/014	*





Level 01 - First GIA - 601m<sup>2</sup> GEA -700m<sup>2</sup> Circulation, Cores & Ancillary Space - 86.5m<sup>2</sup> x2 1beds (x2 person) x5 2beds (x4 person)

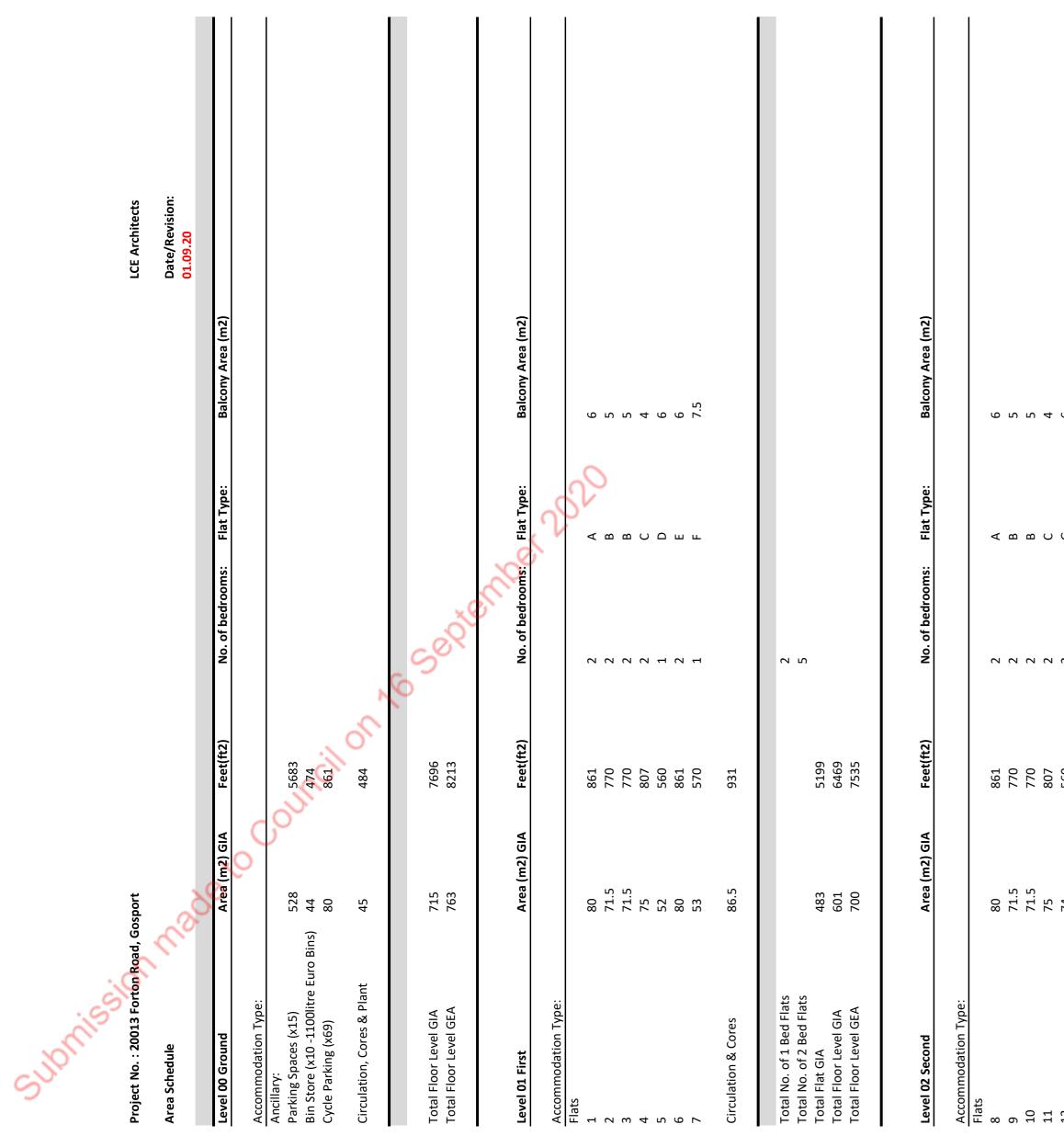
# Pre-App Issue

revision date description

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<sup>project</sup> 4-5 The Towers	scale 1:200@A3	
Forton Road, Gosport	date 28.08.20	
client	drawn	
Peter Arnett Leisure	MD	
	checked	
	MG	
drawing		
First Floor		
Layout Plan		
drawing number	revision	
20013/SK/021	*	
20015/510021		



11         24         24         2         2         2         2           12         13         1         1         1         1         1           12         13         1         1         1         1         1           12         13         1         1         1         1         1           12         13         13         13         13         13         13           12         13         14         14         14         14         14           12         14         14         14         14         14         14           12         14         14         14         14         14         14           14         14         14         14         14         14         14           14         14         14         14         14         14         14           15         14         14         14         14         14         14           15         14         14         14         14         14         14           15         14         14         14         14         14         14 </th <th></th> <th>74 80 53</th> <th>560 861 E 70</th> <th>1 2 2</th> <th>бшц</th> <th>6 6</th>		74 80 53	560 861 E 70	1 2 2	бшц	6 6
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48     517     1     1       71.5     770     2     8       71.5     770     2     8       71.5     770     2     8       74     906     1     1       74     906     1     1       74     705     2     6       74     707     2     6       74     709     2     6       74     705     705     2       83     4166     4     4       470     560     6028     4       73     5145     4     4       73     560     6028     8       73     560     5146     4       73     5145     7     2       73     560     5145     4       73     53145     2     8       73     700     2     8       73     770     2     8       73     770     2     6       73     770     2     6       73     307     405     7       307     4058     405     405		Area (m2) GIA	Feet(ft2)	No. of bedrooms:	Flat Type:	Balcony Area (m2)
48     517     1     1       71.5     770     2     8       71.5     770     2     8       75     807     2     6       75     807     2     6       75     506     1     1       65.5     705     1     1       65.5     705     2     6       65.5     705     2     6       65.5     705     4     1       65.5     705     6     4       387     4166     4       478     546     6028       6028     6028     6       705     850     2       715     850     2       715     837     2       715     833     2       715     833     2       715     833     2       81     7       307.5     4058       307.5     4058       440     4736	Accommodation Type:					
48         517         1         4           71.5         770         2         8           71.5         770         2         8           71.5         770         2         6           74         707         2         6           74         707         2         6           74         707         2         6           74         709         2         6           73         506         603         1           88         5145         4         4           47         540         603         4           73         540         603         1         1           715         850         2         6         1           715         833         2         6         6           73         307.5         3330         2         6           307.5         3310         4         4         1           40         405         1         1         1	Flats					
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74     797     2     G       47     506     1     1     1       65.5     705     1     1     1       65.5     705     2     6     1     1       87     4166     4     4     4     4       387     4166     4     4     4       560     6028     1     1     1       79     850     5     4     4       71.5     770     2     8       71.5     770     2     6       71.5     770     2     6       71.5     770     2     6       71.5     770     2     6       73     730     2     7       82     833     2     7       83     2     7       307.5     3310     4       440     436		75	807	2	C	4
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65.5     705       387     4166       387     4166       387     4166       478     5145       478     5145       478     5145       560     6028       Area (m2) Gia     4       71.5     700       71.5     850       71.5     850       71.5     770       71.5     833       71.5     770       71.5     770       71.5     770       71.5     770       71.5     770       71.5     770       71.5     770       71.5     770       71.5     770       71.5     770       71.5     770       71.5     770       71.5     700       71.5     700       71.5     700       71.5     700       803     2       803     2       71.5     740       71.5     4058       71.5     4058       71.5     4058		47	506	1	_	4
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387     4166     4       387     560     5145       478     5145     5145       560     6028     5145       78     5145     No.of bedrooms:       Area (m2) GIA     Feet(ft2)     No.of bedrooms:       715     700     2       715     850     2       715     833     2       715     833     2       715     700     2       715     833     2       715     700     2       715     710     2       715     710     2       715     710     2       715     710     2       715     710     2       715     710     2       715     710     2       715     710     2       715     710     2       715     749     4       710     4       710     4       710     4       710     7						
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387     4100       478     5145       560     5145       560     5145       Area (m2) GIA     Feet(ft2)       79     850       71.5     770       71.5     770       71.5     807       72.     883       73.5     807       749     7       51     549       51     549       440     4736				4		
560         6028           Area (m2) GIA         Feet(ft2)         No. of bedrooms:         Flat Type:           79         850         2         J           71.5         770         2         B           71.5         770         2         B           71.5         833         2         K           73.5         883         2         K           82         59         2         K           51         549         A         4           307.5         3310         4         4           377         4058         4         4		38/ 178	4100 5115			
Area (m2) GIA         Feet(ft2)         No. of bedrooms:         Flat Type:           79         850         2         J           71.5         770         2         B           71.5         807         2         J           71.5         807         2         B           71.5         807         2         B           71.5         883         2         K           71         549         A         A           807         2         C         B           803         2         K         K           51         549         A         A           807.5         8310         4         A           807.5         8310         4         A           875         405         A         A		560	6028			
Area (m2) GIA         Feet(ft2)         No. of bedrooms:         Flat Type:           79         850         2         J           71.5         770         2         B           71.5         770         2         B           71.5         770         2         B           71.5         833         2         K           71.5         51         549         K           51         549         4         4           307.5         3310         4         4           377         4058         4         4						
Area (m2) GIAFeet(ft2)No. of bedrooms:Iat Type:798502 $J$ 71.57702 $B$ 71.58072 $C$ 758832 $C$ 758832 $C$ 758832 $C$ 798332 $K$ 51549 $A$ 307.53310 $A$ 307.53310 $A$ 3774058 $A$						
79         850         2         J           71.5         770         2         B           71.5         770         2         B           75         807         2         B           75         883         2         K           81         549         K         K           51         549         A         K           307.5         3310         4         4           307.5         4058         4         4		Area (m2) GIA	Feet(ft2)	No. of bedrooms:	Flat Type:	Balcony Area (m2)
79         850         2         J           71.5         770         2         B           75         807         2         B           75         807         2         C           75         833         2         K           51         549         4           307.5         3310         4           377         4058         4	Accommodation Type:					
79 850 2 J 71.5 770 2 B 82 883 2 C 83 51 549 4 307.5 3310 4 440 4736 4						
71.5 7.0 2 6 6 75 807 2 7 6 6 82 833 2 7 4 7 51 549 4 4 307.5 3310 307.5 3310 440 4736 4		79	850	2	_, (	юı
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307.5 3310 377 4058 440 4736		51	549			
307.5 3310 377 4058 440 4736						
307.5 3310 377 4058 440 4736	Total No. of 1 Bed Flats Total No. of 2 Bed Flats			ν		
377 440		307.5	3310	r		
440		377	4058			
		440	4736			

Building Totals	Area (m2) GIA	Feet(ft2)	Area (m2) GEA	Feet(ft2)		1 Bed	2 Bed	Total No. Flat per Flr
Floor Level								
Level 00	71	5	7696	763	8213			
Level 01	601	1	5199	700	6469	2	ъ	7
Level 02	60	1	6469	700	7535	1	9	7
Level 03	47	8	5145	560	6028	2	4	9
Level 04	37	7	4058	440	4736	0	4	4
Total 1 Bed Flats						ß		
Total 2 Bed Flats							19	
Total No . of Flats								24
Total Building GIA	2772	2	28568					
Total Building GEA				3163	32981			

AREA SUMMA

Submission made to council on 16 september 2020

### LCE architects<sup>uk</sup>

design management consultancy

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