

# Planning Statement

## Proposed Hotel, Sandy Park Lodge, Sandy Park, Exeter

*Prepared For*

**Exeter Rugby Group PLC**

**8325**

**24<sup>th</sup> April 2017**



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## 1 INTRODUCTION

- 1.1 This Planning Statement is provided on behalf of Exeter Rugby Group PLC in support of an outline planning application for a new hotel at Sandy Park in Exeter. If approved, the hotel will complement the wider sporting and conference facilities which are already provided at the Sandy Park rugby stadium.
- 1.2 The Applicant proposes a 250 bedroom hotel which would be a maximum of eight storeys in height. Access to the hotel would be provided off the A379 and via the existing stadium complex.
- 1.3 The application is supported by a number of technical documents which have also been submitted. This statement should therefore be read alongside this material which comprises:
  - Scheme drawings and Design and Access Statement prepared by Kensington Taylor Architects (KTA);
  - Transport Statement, prepared by WSP Parson Brinckerhoff (PB);
  - Noise Assessment, prepared by PB;
  - Waste Strategy, prepared by PB;
  - Flood Risk Statement, prepared by Sands Civil and Structural Engineers;
  - Ecological Appraisal, prepared by Green Ecology;
  - Statement of Archaeological Potential, Impact and Mitigation, prepared by AC Archaeology.



## 2 APPLICATION SITE AND SURROUNDINGS

### SITE CONTEXT AND SURROUNDINGS

- 2.1 The Application Site is located immediately to the south of the Sandy Park Stadium complex on the edge of Exeter and close to Junction 30 of the M5 motorway. It falls within the Newcourt urban expansion area of Exeter.
- 2.2 The Application Site comprises a large triangular area of land which is occupied by Sandy Park Lodge, a modern bungalow, and its associated grounds. The land is largely flat and beyond the curtilage of the Lodge – which is laid out as lawn and hard standing - is largely scrub with some tree/hedge planting on the boundaries.
- 2.3 The northern boundary is formed by Old Rydon Lane beyond which lies the Rugby Stadium. To the west lies open ground which is subject to planning permission for a residential-led development. Also to the west lie, but some distance away, a number of houses which are located along Old Rydon Lane. Beyond these, is a considerable amount of new, mainly residential development which has recently been built as part of the Newcourt expansion proposals.
- 2.4 The site's south-eastern boundary is formed by the embankment which runs alongside the M5 motorway.
- 2.5 The Application Site therefore lies within a part of Exeter which is already subject to a considerable amount of development and where further growth is planned and underway.



### **3 PRE-APPLICATION ADVICE**

- 3.1 Prior to the application being submitted, the Applicants sought the advice of officers at Exeter City Council on the principle of development and specific issues requiring attention. Meetings were held with officers in January and March 2017. At the meetings, officers confirmed that they were supportive of the principle of a hotel development on the application site especially given the relationship with the existing Sandy Park development. Officers also provided advice on the scope of technical justification needed to support any application.



## 4 THE PROPOSED DEVELOPMENT

- 4.1 The proposal seeks approval for a hotel of up to 250 bedrooms. The hotel would be high-end (4\*plus grade) and is proposed to be an integral part of the wider Sandy Park stadium complex and which would complement and enhance the existing successful conference and other facilities which are already provided there.
- 4.2 Although in outline with only access included for approval, a range of illustrative information has been provided with the application which demonstrates how a development of this scale could be satisfactorily achieved. The key features of the illustrative scheme are set out within the Design and Access Statement and scheme drawings but can be summarised as:
- the building would be in a 'L' shape and with a maximum height of eight storeys with leisure space on the lower floors and guest accommodation on the four floors above. A restaurant would be provided on the top floor. As the design material shows, the proposed building would be no taller than the existing Sandy Park stadium buildings;
  - Vehicular access for guests would be via the existing access from the A379 to the Stadium;
  - Guest car parking would be provided through the use of the existing stadium car parking immediately to the north of the site. Guests would then access the hotel on foot via a footbridge which would be built to span Old Rydon Lane with the hotel's main entrance on the northern (Stadium) side;
  - Servicing for the hotel and parking for staff would be via a secondary access off Old Rydon Lane with 50 car parking spaces provided on site for this purpose. It is proposed that the hotel servicing area would be located on the eastern side of the building and a turning area for service vehicles has been provided in this part of the site;
  - A deep landscape buffer / wildlife corridor and planting area would be provided along the eastern boundary of the site.
- 4.3 Sections 4 and 5 of the Design and Access Statement provide a clear indication of how the scheme would look when viewed from key locations in the surrounding area.



## **5 RELEVANT PLANNING POLICY**

### **NATIONAL PLANNING POLICY FRAMEWORK**

- 5.1 The NPPF (March 2012) sets out the Government's principles for economic, environmental and social planning policy for England. The Framework articulates the national strategy for sustainable development. The Government intends that this vision should be interpreted and applied to meet local aspirations.
- 5.2 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 6) and it is underpinned by a presumption in favour of sustainable development (paragraph 14). The NPPF makes it clear at paragraph 14 that where proposals accord with the development plan, they should be approved without delay.
- 5.3 Paragraphs 18 and 19 provides the clear stance of the Government's commitment to secure economic growth in order to create jobs and prosperity, ensuring the planning system supports sustainable economic growth.
- 5.4 Paragraph 56 emphasises the great importance of design to the built environment, and that good design is a key aspect of sustainable development and good planning. There is a requirement for high quality and visually attractive development, as stated in paragraphs 58 and 59. The proposed development seeks to ensure that good quality design will be incorporated and materials used will compliment that of surrounding development. The design is described in more detail in the accompanying Design and Access Statement.

### **LOCAL PLANNING POLICY**

#### **EXETER CORE STRATEGY**

- 5.5 The Core Strategy (CS) was formally adopted in 2012 and provides the strategic policy approach for development in Exeter.
- 5.6 Policy CP1 sets out the requirement for the delivery of substantial amounts of new employment, housing and retail in the city. Criterion (iii) identifies the Newcourt area as being a location for a fully integrated mixed use-urban extension. Plan 1 of the CS identifies the site as being within the Newcourt Strategic Allocation Area.
- 5.7 Policy CP15 requires new development to adhere to specific sustainable development measures. Non-residential development undertaken before 2019 should be able to achieve the BREEAM 'Excellent' standard.
- 5.8 Policies CP17 and CP19 provide more detailed policy on the approach which should be taken towards development in the major urban expansion areas including Newcourt within which the site is location. The relevant part of the policy notes that new development should: retain existing hedgerows, be set around a sustainable movement network, retain and enhance biodiversity and make provision for low carbon energy.



## EXETER LOCAL PLAN FIRST REVIEW

- 5.9 The Exeter Local Plan has been partly superseded by the newer CS. However, a number detailed policies which it contains still remain relevant, having been formally 'saved'. Those which are relevant to the proposed hotel development are set out below.
- 5.10 Policy DG1 is a generic design policy. Amongst other things, it requires that new development address the character of the city, be at an appropriate density, be of a height which is appropriate to its context and uses appropriate materials.
- 5.11 Policy DG3 refers to commercial development, including leisure schemes. The supporting text to this policy notes that new development should be designed *"to contribute positively to the image of the City"*. The policy notes that commercial development should be designed to face towards the public realm, avoid the use of large areas of blank wall and locate storage areas in unobtrusive areas of the site.
- 5.12 Policy EN4 states that development will not be permitted if it would increase the likelihood of flooding or would be itself at risk from flooding.
- 5.13 Policy LS1 seeks to prevent development which harms the landscape setting of the City.
- 5.14 Policy TM1 sets out the City's approach to new tourism accommodation. The policy provides support for the location of new hotels in the City Centre. However, although the supporting text to this policy notes that city centre locations are preferable for new tourism developments, the policy itself is silent on the approach which will be taken to such proposals in other parts of the city.
- 5.15 Policy L9 refers to development associated with sports stadia. It explicitly refers to (what was at the time only planned development at) Sandy Park. Policy L9 seeks to support development which is associated with such facilities provided that these do not adversely affect local amenity due to the effects of additional car parking, traffic generation, noise etc.

## NEWCOURT MASTERPLAN

- 5.16 The Newcourt Masterplan does not constitute formal policy but nonetheless represents supplementary policy which has some bearing on development in the area. It shows the eastern part of the site to fall within a wildlife buffer area which runs alongside the M5.

## DRAFT EXETER DEVELOPMENT DELIVERY DEVELOPMENT PLAN DOCUMENT

- 5.17 The draft Development Delivery (DD) document has yet to be formally approved. However, it is planned to provide specific, detailed policies which will support the Council's CS. However, a draft of the document was published in 2015. Although not formal policy, it does provide recent guidance on the approach which the Council wishes to take on a range of development matters.
- 5.18 Draft Policy DD16 makes it clear that new tourism proposals will be supported which *"enhance the profile of Exeter as a destination, address deficiencies in the city's tourism and cultural offer..."*





- 5.19 Draft Policy DD17 refers to the potential for a new hotel to be provided at Sandy Park. It states that *“Planning permission will be granted for a hotel comprising up to 120 bedrooms located within reasonable walking distance of Sandy Park to complement the conference facilities. Elsewhere the sequential test will be applied.”*
- 5.20 These policies are obviously of direct relevance to the Council’s thinking in relation to the development now proposed.



## 6 ANALYSIS OF TECHNICAL MATTERS

### HIGHWAYS AND TRANSPORT

- 6.1 As part of the application, a Transport Statement (TS) and Travel Plan (TP) have been prepared by WSP/Parsons Brinckerhoff (WSP) and copies of these have been provided as part of the application.
- 6.2 The TS considers relevant transport policy, the existing conditions in the area around the site including those affecting roads, pedestrians and cyclists and public transport, the development proposed and trip generation. It also provides an assessment of the impact on traffic. As part of the work, consideration has been given the effect of hotel transport issues during match days.
- 6.3 Section 3 considers existing facilities in the area. It notes that the proposed hotel would be within walking distance of bus stops and railway stations. Newcourt Station is only 650m away and Digby and Sowton Station only 1300m away.
- 6.4 Section 4 reviews the development proposals. It notes that 50 car parking spaces will be provided on-site for staff use only
- 6.5 Guests would use the existing Sandy Park parking areas and then transfer on foot across the proposed bridge to the hotel. As part of the TS, analysis has been completed on the level of parking which will be required by hotel guests and who would use the existing parking areas. Paragraph 4.3.5 notes that the number of spaces required by hotel guests during the daytime will be 80-90 rising to a maximum of 137 during the night. Using this information, management of guest parking during match days is proposed in the following manner (see paragraph 4.3.7 of the TS) – 85 hotel parking spaces would be provided at the south end of the stadium together with a further 55 spaces generated by that number of fewer parking permits being issued to spectators/attendants. These measures would therefore ensure that sufficient spaces (14) are available to hotel guests during the busiest times at Sandy Park to accommodate the maximum need identified of 137 spaces.
- 6.6 Section 4 also notes that cycle storage facilities are proposed.
- 6.7 Section 5 considers the number of guest trips generated by the proposed hotel. These are summarised in Table 5-1. This notes that in the morning peak, a total of 93 trips would be generated and in the afternoon peak, a total of 70 trips. The TS also notes that 35 staff trips will be generated in each peak. Paragraph 5.3.2 notes that between Sandy Gate roundabout and the Sandy Park junction, the development will generate 80 movements in the morning peak and 62 during the afternoon peak.
- 6.8 Section 6 assesses the impact of the traffic generate on the area. As part of the analysis on this issue, consideration has been given to existing planned developments (see Section 6.2), traffic growth across a range of locations (see Section 6.3) and to the capacity of key junctions in the area (see Section 6.4) specifically the A376/Clyst Road junction and the Clyst Road/Old Rydon Lane junction.



- 6.9 Section 7.2 of the TS sets out the conclusions. The Statement concludes that the proposed development is located in a suitable location and is accessible to public transport. In relation to traffic impacts, the analysis concludes that with the development in place, the A376 Sidmouth Road / Clyst Road junction would remain within capacity during the afternoon peak and be only marginally over-capacity during the afternoon. For the Clyst Road / Old Rydon Lane, the scheme would not generate traffic which would exceed the junction capacity at any time.
- 6.10 In addition to the TS, a Travel Plan has been prepared. This reviews the opportunities for various sustainable travel measures to be proposed. Section 6 of the TP details a range of measures which could be used to reduce dependence on car use. These include the provision of extra information on walking and cycle links in the area, on available public transport and the provision of measures to facilitate car sharing.

### **ECOLOGY**

- 6.11 An Extended Phase 1 Habitat Survey of the site has been carried out by Green Ecology and a copy of this has been provided as part of the application. A survey of both the land and the existing bungalow was carried out on 13<sup>th</sup> April 2017.
- 6.12 The survey notes that the site is of low ecological value due the dominance of cleared dense scrub and amenity grassland. The bungalow and garage were identified as being potential bat roosts and a number of likely pipistrelle bat droppings were found in bungalow roof. Given the nature of the proposed scheme, the ecology notes that there would be harm to bat habitat. It therefore recommends a number of mitigation measures to include:
- Retention of boundary vegetation wherever possible and additional planting to enhance connectivity for bats;
  - Creation of a Devon hedgerow along the western boundary of the site to enhance wildlife connectivity and provide bird nesting habitat;
  - Cutting of grassland to prevent colonisation by reptiles prior to enabling and construction works.
- 6.13 The report also notes that further bat surveys will be carried out in the coming months between May and September and a further ecological report provided to support the application at that point.

### **FLOOD RISK AND DRAINAGE**

- 6.14 Analysis of flood risk and drainage issues has been carried out by Sands Engineers and a copy of their Flood Risk Statement (FRS) which covers this work has been provided as part of the application.
- 6.15 In relation to flooding issues, Section 3 of the FRS notes that site is not at risk from fluvial (watercourse) flooding and is outside the Environment Agency's flood plain areas. The land is not at risk from surface water, ground water, tidal or reservoir flooding. The FRS notes that currently, all storm water from the site drains into an existing combined sewer.



- 6.16 The FRS notes that it will be possible to design a surface water drainage system to either adhere to a SUDS based system, where ground conditions allow, or to the watercourse which runs along the eastern boundary if an infiltration based approach is not possible.
- 6.17 It is proposed that the foul water discharge from the proposed development will connect into the existing combined sewer.
- 6.18 Section 4 of the FRS notes the requirements for new development to adhere to greenfield and climate change run off rates and it is noted that as part of future detailed scheme design, all the necessary requirements will be met.

## NOISE

- 6.19 A Noise Impact Assessment (NIA) for the proposed mixed use development has been carried out by WSP Parsons Brinkerhoff (WSP) and a copy of this has been submitted as part of the application.
- 6.20 As part of Section 3 of the NIA, WSP have identified the relevant guidance and standards which are likely to apply to a hotel development. These include BS8233:2014 which relates to internal noise levels of living accommodation, including hotels and BS4142:2014 which can be used to assess noise occurrences likely to have an affect on residential or similar uses. Table 3.1 notes that desirable internal noise levels should be 35 LAeq (for living rooms), 40LAeq (for dining rooms) and 35 LAeq (for bedrooms, daytime) and 30 LAeq (bedrooms, night-time). Consideration has also been given the calculation of road noise, given the proximity of the site to the motorway.
- 6.21 As part of the NIA, a number of noise surveys were carried out, the methodology having first been agreed with Exeter's environmental health officers. The location of the noise surveys are shown in Figure 4. These were carried out on 6<sup>th</sup> and 11<sup>th</sup> April 2017 and included locations alongside within the area of land approved for residential development, immediately to the west of the site and a position on the edge of the site alongside the motorway.
- 6.22 Section 6 of the NIA provides an assessment of the survey work and sets out the noise levels which are likely to be encountered along the full length of the building and the level of noise insulation which is likely to be needed.
- 6.23 Section 8 of the NIA provides a conclusion on the work carried out. At paragraph 8.1.2, the NIA notes that the main source of noise affecting the proposed development would be the adjacent motorway. The lower levels of the hotel are likely to be screened by the topography but with the higher levels more directly affected by noise. However, the different uses proposed within the hotel mean that higher noise limits will be more acceptable in some areas than others.
- 6.24 At paragraph 8.1.3, the NIA notes that the level of noise insulation needed for sleeping accommodation means that windows will need to remain shut. However, the NIA notes that *"commercially available glazing and ventilation systems are available that would be expected to result in acceptable internal noise levels compared with appropriate criteria."*



- 6.25 In relation to hotel plant noise, the NIA at paragraph 8.1.4 notes that plant should not be located on the western and southern facades of the building. It notes that plant noise limits have been identified as part of the report to ensure that there would be no adverse impact on the new residential development which is located immediately to the west of the site.
- 6.26 At paragraph 8.1.5, the NIA concludes that provided the measures summarised above are implemented, *“no significant noise impacts associated with the proposed hotel”* are expected. Such measures could be secured through the use of an appropriately worded planning condition attached any grant of permission.

### **WASTE AUDIT**

- 6.27 A Waste Audit has been carried out by WSP Parsons Brinkerhoff (WSP) and a copy of this has been submitted as part of the application. The Audit assesses the likely waste arisings from both the construction and operational phases of the development. It identifies a range of measures for reducing waste generation and potential recycling measures.

### **ARCHAEOLOGY**

- 6.28 An analysis of the site’s archaeological sensitivity and the likely impact of the hotel scheme on archaeology has been carried out by AC Archaeology and a copy of their report has been submitted as part of the application.
- 6.29 Section 2 of the report notes that the site is located in an area where a number of recent archaeological investigations have been carried out. 14 non-designated heritage assets have been recorded in the vicinity of the site, including one (a collection of prehistoric flint flakes) within the site itself. Within adjoining plots, a number of Neolithic / Bronze Age and Romano-British remains have been found.
- 6.30 Section 5 of the report sets out the likely archaeological potential of the site. Paragraph 5.2 notes that previous studies have shown the presence of a range of prehistoric features and there it is possible that further deposits from prehistoric and Romano-British periods exist which are yet to be found. It is also considered that some remains might also exist from battles at Clyst Heath.
- 6.31 Taking into account the evidence available to-date, the report notes (paragraph 6.2) that the nature of the site is likely to limit the use of a geophysical survey. In light of this, AC Archaeology therefore recommend that a programme of archaeological works be required to be carried out prior to construction of the hotel, probably in the form of trial trenching plus any follow works which might be needed. The report adds that such a programme could be secured via the use of planning condition attached to any grant of permission.



## 7 JUSTIFICATION FOR PROPOSED DEVELOPMENT

- 7.1 The scheme proposes the construction of a high-end hotel whose purpose would to be enhance and compliment the existing substantial and successful sporting and conferencing facilities which are on offer at the Sandy Park Stadium. As a matter of principle therefore, the scheme represents a pragmatic way of enhancing Exeter's tourism and cultural offer in a location which is already planned for, and subject to, a considerable amount of mixed use development. The merits of such an arrangement are recognised in the Council's Core Strategy and its emerging Development Delivery Document which respectively seek to enhance the city's visitor offer and to make provision for a new hotel at Sandy Park.
- 7.2 Although a use which might ordinarily be expected be located in a town centre location, the specific role of the hotel – to support and enhance the existing facilities at Sandy Park - mean that this is not a free standing use and it is not appropriate to seek to apply the sequential approach in the normal way. Notwithstanding this point, it will be noted that the scheme's location directly alongside the existing Stadium and with excellent road and rail links mean that the site is perfectly located to support activities at Sandy Park. Furthermore, although it is important that any scheme needs to be designed to respect the character of the surrounding area, the site's location alongside the M5 and close to Junction 30 means that a high grade hotel of the type proposed can act as further strong economic "sign-post" for Exeter. It is therefore considered that the principle of a new hotel in this location is acceptable and will be beneficial for the visitor and also wider economy and attractiveness of Exeter as the regional capital of the area.
- 7.3 In relation to specific issues, it will be noted that the proposed hotel has been designed to be no more than eight storeys in height. Importantly, and as the visualisations within the Design and Access Statement show, it would be viewed within the context of, and no greater in height than, the existing Sandy Park Stadium. It is proposed that various design measures, such as the use of high quality materials and landscaping will be proposed as part of the development. These measures can all be applied as part of the reserved matters or conditions stages in line with the parameters proposed as part of illustrative design material. It is therefore reasonable to expect that the hotel can be designed to be built to a very high standard commensurate with its 4\* or higher rating.
- 7.4 A full suite of work has been undertaken to inform the scheme design and underpin the application. This work confirms that whilst a number of constraints do exist, there is nothing which would indicate that a hotel of the size proposed is either not achievable or that such a development would be inappropriate. In relation to access, the proposals would not have any material adverse impact on local highway capacity whilst the design of the scheme means that existing parking at Sandy Park would be used for hotel guests so that only a small number of spaces are needed on site for use by employees only. This has the obvious benefit of reducing the dominance of car parking within the scheme design which might otherwise result. Furthermore, it has been shown the necessary levels of parking would be available to residents even during the busiest periods - match days.
- 7.5 In relation to other technical matters, the proposed development would employ measures which would ensure that the wildlife corridor on the eastern side of the site would be



retained and enhanced. In relation to noise, measures can be used to ensure that the levels required to ensure an appropriate standard of amenity for hotel guests can be achieved. The site is not at flood risk and measures have been identified to ensure that appropriate levels of surface water drainage can be achieved. Where necessary, specific details to address constraints and provide the mitigation identified in the various reports can be secured as part of the next steps in the design process for example as part of any reserved matters application.

- 7.6 In summary therefore, the proposed hotel would provide an important complimentary element to the development of Sandy Park which is one of Exeter more important sporting, leisure and conferencing venues. The scheme has been carefully designed to ensure that it would form an integral part of the wider complex and so that it would be appropriate to the character of this part of Exeter. Given these points and in the absence of technical reasons which might suggest that a new hotel development was not possible in this location, it is our view that the scheme proposes a high quality and entirely appropriate form of development which accords with both national and local planning policy. It is therefore hoped that the Council will support the proposals and grant planning permission.