



Appeal Decision

Site visit made on 1 June 2020

by Andrew Smith BA (Hons) MA MRTPI

an Inspector appointed by the Secretary of State

Decision date: 09 June 2020

Appeal Ref: APP/F2605/W/20/3245028

Premier Inn, Brandon Road, Thetford IP24 3PG

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Whitbread Group Plc against the decision of Breckland District Council.
 - The application Ref 3PL/2019/0751/F, dated 19 June 2019, was refused by notice dated 15 November 2019.
 - The development proposed is erection of a two-storey hotel annex and alterations to existing hotel entrance (Use Class C1), alterations to car parking layout, landscaping and associated works.
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Decision

1. The appeal is dismissed.

Procedural Matter

2. Since the determination of the planning application that is now the subject of this appeal, the Breckland Local Plan (November 2019) (the Local Plan) has been adopted by the Council and can now be afforded full weight in decision making. Both main parties to this appeal have had the opportunity to make comments upon the implications of this and I shall consider the appeal accordingly.

Main Issue

3. The main issue is the effect of the proposed parking arrangements upon highway safety.

Reasons

4. The appeal site contains an existing previously extended hotel, a linked pub/restaurant facility and an associated car park. It is located adjacent to where Maine Street (the Street) meets Brandon Road and in proximity to where Brandon Road connects to the A11 dual carriageway. The Street offers a single point of access to Brandon Road for a significant number of residential properties. The Street also provides vehicular access to the appeal site and is, for the most part, not subject to parking or waiting restrictions.
5. The Local Plan contains specified parking standards that set out a minimum expected provision of one car parking space per hotel bedroom. A minimum standard of 1 space per 5 square metres of pub/restaurant floorspace also applies. Whilst the full pub/restaurant standard would only justly apply to a

standalone facility, it is still reasonable to expect the on-site pub/restaurant to generate a not insignificant number of parked vehicles disconnected to hotel stays. Indeed, this has been highlighted through the latest September 2019 parking survey work that has been undertaken.

6. The proposal involves the loss of part of the existing on-site car park in order to construct a new standalone hotel annex. An additional 28 bedrooms are planned at the ultimate expense of 21 car parking spaces. A total of 105 parking spaces would be provided on-site to serve what would be a 116-bed hotel facility with a linked pub/restaurant. It is thus evident that, when viewed against the Local Plan's recommended parking standards, a considerable shortfall in parking spaces would result from the proposal.
7. Nevertheless, as set out within Policy TR02 of the Local Plan, the parking standards are intended to provide only a starting point when considering the appropriateness of the intended amount of parking provision. There are other factors at play that must be given due consideration, including the makeup of the site's surroundings and the potential scope for alternative modes of transport to be utilised. Furthermore, the proposal is supported by a Travel Plan (June 2019) as well as various parking surveys, that have been undertaken at the appeal site and elsewhere in the interests of seeking to illustrate the proposal's actual parking requirement in practical terms.
8. The site, being located a fair distance away from Thetford town centre, does not readily lend itself to being conveniently accessed by hotel guests by means other than private transportation. Whilst there are well-lit footways and local cycleways that link the site to the town centre, as well as to the town's bus and railway stations, the distances involved are noteworthy and likely to be unrealistic to be negotiated by guests on foot or by cycle. This is particularly if travelling with luggage.
9. There are various bus services that operate from different stops situated within potential walking distance of the site. However, there is significant doubt that future hotel guests would be both prepared and conveniently able to depend on local bus services (perhaps in conjunction with rail services) to travel to and from the hotel at the beginning and end of their stay. It is instead pertinent to note the site's proximity to the A11. As acknowledged within the submitted Transport Statement (June 2019), car journeys form the primary mode of travel for guests reaching the site initially.
10. The submitted Travel Plan (June 2019) (the TP) contains various initiatives with one of the primary objectives being to reduce single occupancy car travel. The TP would be anticipated to play an important role in influencing commuting trips made by staff and the types of journey made by guests during their hotel stay. Indeed, the intended initiatives include a local employment policy and the advertisement of sustainable travel options. It is also the case that the transport choices of pub/restaurant visitors could be positively influenced to some degree by the implementation of the TP. However, I do not consider that the TP, even if fully implemented, would make a noticeable difference to the way in which hotel guests would ordinarily choose to access the site in the first instance.
11. During inspection the site's car park contained only a very limited number of parked vehicles. However, my visit took place whilst the hotel and linked pub/restaurant were both temporarily closed. My own observations of on-site

parking arrangements are thus of little relevance in terms of gauging typical levels of demand. Nevertheless, a series of parking surveys have been carried out at the site covering periods of up to a week during the months of July 2018, February 2019, July 2019 and September 2019. Whilst the surveys, in broad terms, provide fairly consistent findings, only the most recent parking survey was carried out independently and at regular intervals. Thus, of the suite of survey information before me, the September 2019 work (the latest survey) carries the most relevance and weight.

12. The latest survey was undertaken over four consecutive days (Thursday – Sunday) and the results, when factored to reflect the additional bedrooms that are proposed, show a peak demand for 105 parking spaces upon the Friday evening. This equates to the total number of spaces hereby proposed. Furthermore, the peak accumulations surveyed upon the Thursday and Saturday evenings, whilst lower in comparison, fell not far short of the peak Friday figure.
13. Both the latest survey and the preceding survey work undertaken indicate that the overall parking provision that is intended would be sufficient to accommodate the anticipated demand for parking that would be generated at the site during peak evening and early morning hours. Nevertheless, the suite of work indicates that, at peak times, there would be limited headroom available when cross-referencing the anticipated on-site demand and the intended supply of spaces. This finding is most apparent when the results of the latest survey are considered in isolation.
14. The Highway Authority (the HA) has raised objections to the proposal, and this is a matter of importance as they are responsible for the safety of road users on the local highway network. Indeed, the HA contend that the survey work carried out does not fully correspond with the times of highest demand for the pub/restaurant (such as during festive periods). They have also highlighted the findings of 2015 survey work that assisted in justifying the development of a previous 18-bedroom extension at the site. Indeed, it was identified at that time that the site's car park experiences a high demand for parking. Furthermore, any spare parking capacity identified in 2015 was anticipated to cater for hours of particularly high demand at the pub/restaurant.
15. Whilst the 2015 survey is now somewhat dated, it is still a relevant material consideration. A further 28 bedrooms are now proposed at the expense of 21 car parking spaces. Both the intended increase in rooms and decrease in spaces would be noticeable in extent. In the context of previous findings, I do not consider that a sufficiently vigorous or robust suite of survey work has been carried out to clearly demonstrate that the intended reduced car parking area would consistently operate within capacity during peak hours of demand. This is particularly when noting that a considerable shortfall against adopted parking standards can be identified. Furthermore, it is pertinent to note that evening mealtimes at the pub/restaurant would coincide, at least in part, with periods of anticipated high parking demand associated to hotel stays.
16. Additional survey data has been provided from other shared Premier Inn/restaurant sites situated nationwide in the interests of validating the results of site-specific surveys and establishing the post-development operation of the site. However, this additional data is of limited relevance. Indeed, each site, whilst potentially sharing some similarities, will have varying site-specific

and locational characteristics. An appeal decision¹ at Enfield appears in the evidence before me, yet the specific highway safety matters that were in dispute there vary when considered against this appeal.

17. The appellant has referred to a two weekday night standard contained within parking survey guidance produced by Lambeth Council. This standard would appear to primarily apply to residential developments rather than commercial developments. In any event, the particular guidance document in question is of limited relevance to the determination of this appeal.
18. I see some merit in the notion that it would not be in the appellant's interest to under-provide in terms of on-site car parking. Indeed, the availability of such facilities would often be of importance to hotel guests and pub/restaurant customers. Nevertheless, in this case there are alternative and unrestricted potential opportunities for hotel guests to park on the Street in proximity to the site.
19. The latest survey includes monitoring of parking upon the Street and, without exception, all observed vehicles were not linked to either the hotel or pub/restaurant. Consistent with that finding, I myself witnessed cars having parked on the Street and near to the site when the hotel was closed. I accept that, based on current circumstances, it would be unlikely for customers of either the hotel or pub/restaurant to park on the Street, or anywhere else other than within the site's car park.
20. I have not been provided with compelling evidence to suggest that the proposal would necessarily lead to safe pedestrian movements being impeded or to excessive mud/debris being transferred on to the carriageway. Furthermore, suitable on-site manoeuvring opportunities would be provided and the proposal would not in itself be expected to generate a significant increase in vehicular traffic movements.
21. However, the proposal would hold the realistic potential to lead to a considerable number of additional vehicles being parked on the Street near to the site during periods of high parking demand. This would promote difficulties being experienced by motorists seeking to navigate the Street. To my mind, free and unimpeded traffic movements would be unacceptably prejudiced by the proposal. This is particularly when noting the number of residential properties that are dependent upon the Street for access to the wider highway network and the proximity of the site to the Street's junction with Brandon Road, which is a road I observed to accommodate regular traffic movements befitting of its classified status.
22. I share the HA's concerns as regards the potential for parked vehicles to create obstructions and impediments to the free movement of traffic, even if setback from the Street's junction with Brandon Road. Indeed, the details of a personal injury accident that occurred in 2017 relating to a manoeuvre involving parked cars on the Street have been provided. Whilst merely a single incident, it assists in corroborating the dangers associated with encouraging additional on-street parking in the same general location.
23. It has not been clearly demonstrated that the potential future introduction of waiting restrictions upon the Street would fully resolve the expected difficulties

¹ APP/Q5300/W/18/3193775

that would be associated with an under provision of on-site parking spaces. Indeed, alternative on-street locations where customers could realistically park both conveniently and safely were not readily obvious from inspection.

24. For the above reasons, the proposed parking arrangements would be expected have a negative effect upon highway safety and thus cause harm. The proposal conflicts with Policy COM01 of the Local Plan in so far as this policy requires that the design of new development does not compromise highway safety and provides adequate parking.
25. Whilst Policy TR02 of the Local Plan has not been identified by the Council as a policy relevant to the determination of this appeal, it requires development proposals to provide safe, suitable and convenient access including appropriate parking and servicing provision in terms of amount, design and layout. I have found that an insufficient amount of parking provision is proposed such that, in this sense, the proposal also conflicts with Policy TR02.
26. Policy HOU6 of the Local Plan relates specifically to the principle of new housing. The proposal that is before me relates to a hotel extension. Thus, for the avoidance of doubt, I consider Policy HOU6 to be of little relevance to the outcome of this appeal. As a further point of clarity, when noting the site's urban location and the nearby availability of sustainable transport modes, I do not find conflict with Policy TR01 (Sustainable Transport Network) of the Local Plan.

Other Matters

27. I have noted objections/concerns raised by interested parties with respect to matters including the effect upon neighbouring living conditions and upon existing trees. However, as I have found the proposal to be unacceptable for other reasons, it is not necessary for me to explore these matters further here.
28. The proposal would promote the effective use of land, support economic growth, provide additional jobs and encourage expenditure in the local economy. However, owing to the relatively modest scale of development under consideration, such contributions would cumulatively attract moderate weight and would not outweigh the significant harm and associated policy conflict that I have identified.
29. The proposal conflicts with the development plan when read as a whole, and material considerations do not lead me to a decision otherwise.

Conclusion

30. For the reasons set out above, the appeal is dismissed.

Andrew Smith

INSPECTOR