

TOWN & COUNTRY PLANNING ACT 1990

BICESTER HOTEL GOLF AND SPA LTD

SEQUENTIAL ASSESSMENT

BICESTER HOTEL GOLF AND SPA

CHESTERTON

OXFORDSHIRE

OX26 1TE

Erection of two storey extension to existing hotel with roof accommodation to form 62 new bedrooms (net increase of 60No. bedrooms)

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1. INTRODUCTION

- 1.1 This report addresses the requirement under Paragraph 24 of the National Planning Policy Framework to undertake a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. The document is to accompany a planning application for a proposed 62 (net increase 60) bedroom extension to the hotel at Bicester Hotel Golf and Spa, Chesterton, to provide a total of 112 bedrooms.

2. NEED

- 2.1 Following the publication of the National Planning Policy Framework, the Practice Guide that accompanies PPS4 (Planning for Town Centres Practice Guide) was retained by the Government. However, the publication of the National Planning Policy Guidance cancelled the PPS4 Practice Guide in 2014 but the same principles largely apply (i.e. town centre locations to be assessed in the first instance followed by edge of centre and finally out of centre preferably in accessible locations).
- 2.2 There are currently some 977 hotel bedrooms located in 21 hotels in Cherwell District. The most recent Council evidence document, The Cherwell Tourism Development Study (2008) has identified a specific lack of *'higher quality, larger and branded accommodation'* (page 32). Whilst the proposed extension is not branded, as the only 4 star hotel in the District, it would provide additional bedspaces at the high end of the market for which there is still an identified need. It should be noted that of the development proposals identified in the report, the south west urban extension has delivered only 84 bedrooms and not the stated *'150 room high quality hotel on the eastern side of the A34.'* (i.e. Planning application ref.06/00967/OUT and 12/00063/REM resulted in the 84 bed Premier Inn).
- 2.3 As part of the Cherwell Tourism Development Study (2008), a survey of operators was undertaken. This revealed an average annual occupancy of around 58%. However, there was a wide variation in occupancy levels with some achieving 70-

80% occupancy. Occupancy levels in the larger hotels (20+ rooms) is at an average of 68% and amongst the very largest hotels is 63% (page 20). Bicester HGS has a 16.8% greater occupancy rate predicted for 2014/2015 than the UK average rising to 18.4% for 2015/2016.

- 2.4 The situation in 2015 remains the same as when the 51 bed application was submitted in 2013. There are currently no hotels in Cherwell District within an existing golf, leisure or country club complex. The hotel that is closest in terms of the facilities offered is the Holt Hotel but this does not provide a golf course or leisure and spar facility on the same scale. Instead it has a far greater number of hotel rooms (154) but at a 3 star grading. Additional hotel accommodation would therefore meet a specific requirement (i.e. hotel accommodation meeting a specific demand for associated on site leisure uses) which no other hotel in the District could reasonably be expected to meet. This argument was paramount when the previous application was considered by the Council.
- 2.5 Bicester HGS has therefore identified Cherwell District as a suitable location for additional high end hotel rooms given:
- High current occupancy rates at the existing hotel at Bicester HGS (i.e. significantly higher than the national average) and proven high occupancy rates for larger hotels in Cherwell (see Council's Tourism Study);
 - A proven lack of high end accommodation (i.e. 4/5 star – See Council's Tourism Study);
 - Lack of accommodation specifically aimed at golfing and leisure breaks as well as business and events (weddings and conferences).
- 2.6 It is therefore concluded that there is a need for additional high end accommodation and that the proposed scale of 62 (net increase of 60) rooms can be provided without material harm. The recently constructed and consented hotels have not filled the higher end void and are overwhelmingly providing 2 and 3 star accommodation.

3. THE SEQUENTIAL ASSESSMENT

- 3.1 National Planning Policy to guide new hotel development to the most appropriate locations is set out in the National Planning Policy Framework and National Planning Policy Guidance.
- 3.2 Paragraph 24 of the NPPF and the accompanying glossary considers hotels to be a main town centre use and in promoting locations for new development should be considered in the following order:
- Locations in town centres;
 - Edge of centre locations
 - Out of centre locations with preference given to accessible sites that are well connected to the town centre.
- 3.3 The NPPG sets out how the sequential test should be used in decision taking and states that this should be proportionate and appropriate to the given proposal. Clearly the fact that this site already has planning permission for an additional 51 bedrooms and that this is extant for a further 18 months is a material consideration and should be taken into account in terms of proportionality and appropriateness.
- 3.4 In considering whether a proposal complies with the test, the following matters are required to be taken into account:
- Has the suitability of more central sites to accommodate the proposal been considered? Where the proposal would be located in an edge of centre or out of centre location, preference should be given to accessible sites that are well connected to the town centre. Any associated reasoning should be set out clearly.
 - Is there scope for flexibility in the format and/or scale of the proposal? It is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being

proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.

- If there are no suitable sequentially preferable locations, the sequential test is passed.

3.5 Since the publication of the NPPF, a relevant case was considered by the Supreme Court (*Tescos Stores Ltd V Dundee City Council (2012)*). This case has clarified that the sequential test should apply to the specific proposal for which permission is sought. The relevant question is not whether there is a site *'suitable for meeting identified deficiencies in retail provision in the area'* but whether there is a site *'suitable for the development proposed by the applicant.'* Furthermore, the question is *'not whether the proposal development can be altered or reduced so that it can be made to fit an alternative site.'* The Court considered that in assessing whether or not a suitable sequentially preferable site exists, development and planning authorities have to ask whether such a site is suitable for what the developer wishes to build, not what might be required to meet a deficiency in the area. The conclusion that can be gained from this decision is that the question to be considered was whether a sequentially preferable site was suitable for the proposed development, not whether the proposed development could be altered or reduced so that it could be made to fit an alternative site.

3.6 This report therefore considers sites in the following manner:

- Is the site within, adjacent or within close proximity of leisure facilities containing a golf course, and preferably the accompanying leisure facilities that clearly identify Bicester HGS. (i.e. the NPPG states that the use of the sequential test should recognize that certain main town centre uses have a particular market and locational requirements which mean that they may only be accommodated in a specific location.
- Is the existing site a four star hotel?

- 3.7 Any potential sites that are not reasonably available, suitable or viable can be discounted.

4. THE BICESTER HGS PROPOSAL

- 4.1 Bicester HGS has identified a need for additional bedrooms at the site. Bicester HGS operates the only multi use hotel, golf course, health and fitness spa and conference / wedding facility in Cherwell District. The applicant is therefore in an excellent position to assess need and an appropriate level of provision and the higher end of hotel provision (i.e. four or five star).
- 4.2 Bicester HGS require the extension to be well related to the existing hotel complex and the remainder of the associated facilities such as bars and restaurants which already exist internally on the complex. In addition, they also require that the hotel relates well and has good accessibility to the golf course and leisure facilities including the pool / spa / health and fitness, and tennis courts. As set out in the accompanying letter from the Transport Consultant, no additional parking spaces are required. Elsewhere on the site, the additional rooms are not considered to result in any further changes.

5. IDENTIFICATION OF ALTERNATIVE SITES

- 5.1 The applicants have sought to identify alternative sites through the following sources:
- Cherwell District Local Plan (adopted and Non Statutory)
 - Banbury and North Cherwell Site Allocations (2006)
 - Bicester and Central Oxfordshire Site Allocations (2007)
 - Cherwell Submission Local Plan

- Internet Searches for vacant / available property;
- Potential of existing hotels to accommodate additional rooms in a multifunctional leisure/golf complex
- Sites with planning permission but not completed.

6. SITE SELECTION

6.1 Bicester Hotel and Golf and Spa occupies a site which is in excess of 100 acres in size (46 hectares). Sites have therefore been assessed to reflect the current use of the site which is a mixed use of leisure and business / wedding uses in order to provide hotel accommodation of a similar standard (i.e. the site is essentially a 'golf and country club'. The requirement is therefore to find a site of an equivalent standard but in order to meet this, a range of sites have been assessed including suggested site allocations for hotels and existing hotels. As there are no other golf clubs in the District with a hotel, it is not considered to be reasonable to assess any existing golf courses other than those have are being individually promoted as suggested sites. The NPPG is clear that local planning authorities should consider the applicant's particular market and locational requirements and it is therefore considered reasonable to include the very uses that influence customers in their choice to stay at Bicester HGS in the assessment (i.e. sport and leisure facilities).

6.2 The applicants have not investigated:

- Suggested Housing and Employment sites; (only sites in the emerging Local Plan which specifically mention hotel uses)
- Urban Extensions (i.e. Bicester) (other than those identified in the emerging Local Plan)
- Designated open space, allotments, countryside beyond the urban boundary;
- Guest houses, hostels and bed and breakfast accommodation.

i) Cherwell Local Plan 1996 and Non Statutory Cherwell Local Plan 2011 – Site Allocations

- a) Junction 11, M40: Identified in both the adopted and Non Statutory Local Plans for a site as a hotel. Already developed and fully implemented to provide a 120 bedroom Holiday Inn.
- b) Oxford Road / Middleton Stoney Road: Identified in both the adopted and Non Statutory Local Plans as a site for hotel and leisure use. The land now forms part of the South West Bicester Phase 1 development. As part of this development an 84 bedroom Premier Inn has been recently built adjacent to the Oxford Road (A41).

ii) Banbury and North Cherwell Site Allocations Development Plan Document (2006)

- a) Banbury Golf Centre: Banbury Golf Centre is located to the south east of Adderbury on the Aynho Road. The suggested site allocation is adjacent to the Golf Centre which provides for a 27 hole course. The suggested use as a 'golf hotel' amounts to a total site area of 7.54 ha. The site currently does not have a hotel or leisure use facilities. An application and appeal were dismissed in 2006 for a 60No. bedroom hotel on the basis of the impact on character and sustainability. The site is further from major population areas than Bicester HSG and therefore sequential less favourable. There are no other facilities on site which would justify a substantial hotel development. The site is therefore classified as being 'out of centre'. Whilst the site is therefore available there is no indication that it will fulfill the current need for 4 star accommodation. No further applications have been submitted and the site allocation has not reached a stage whereby there is sufficient certainty to suggest that the site will be allocated.
- b) Waterworks Site, South of Grimsbury Reservoir: The 1.8 ha site is located within a disused part of the waterworks. Its 'suggested use' is for 4,000sq.m hotel / leisure use. The site is located within the urban area of Banbury but as it is not

defined as being either town centre or edge of centre, it should be classified as 'out of centre'. Whilst the site is available, there is neither the space on the site or on adjacent land to provide for the extent of leisure and recreational facilities that would reflect those at Bicester HGS. In addition, as the site allocation has not been confirmed, there is considerable uncertainty about whether the allocation will remain.

iii) Bicester and Central Oxfordshire Issues and Options Paper (2007)

- a) Land North of Piggy Lane: This 0.34 ha site is located in an edge of centre location in Bicester and would comprise of an extension to an existing 36 bedroom hotel. The hotel has no leisure facilities and is not within close proximity of either a golf course, health and spa facility or a 'golf and country club'. Whilst the site is sequentially more preferable, any additional hotel rooms on a limited sized site would not fulfill the applicant's requirements to meet the need for leisure breaks. Conference and wedding facilities are limited to 105 guests. The hotel is also ungraded and therefore any increase in hotel room accommodation would not provide additional rooms towards the upper market end where the need arises.
- b) Land to the East of A41 – Oxford Road: This 27.36 ha site is located on land that is currently predominantly in agricultural use. Its suggested use is for a business park incorporating a hotel. Sequentially the site is 'out of centre' although it is identified for future new employment uses. The site lies approximately 2km to the east of Bicester HGS. Whilst the site might prove to be acceptable for future hotel use it will cater for a different market to Bicester (i.e. the site is almost directly adjacent to Bicester Village and a proposed new employment site). In terms of leisure and recreational stays a new hotel would not be able to provide this type of related accommodation unless the entire site was developed for a mixed hotel, golf and leisure complex which appears unlikely.

iv) Cherwell Submission Local Plan (Proposal Sites)

Bicester 1: Includes C1 use as part of a mixed use local centre hub. Site is out of centre and sequentially no more preferable than the Bicester HGS.

Bicester 3: Includes a hotel as part of the strategic development site to be built under phase 1 which is already under construction. Site is no more sequentially preferable than Bicester HGS.

Bicester 8: States that the Council will support tourism uses as part of a wider suite of uses for the former RAF Bicester site.

Banbury 8: Town Centre site includes provision for a hotel.

Banbury 9: Town Centre site includes provision for a hotel.

Whilst it is accepted that two of these sites are sequentially more preferable (Banbury 8 and 9), neither site is located next to a golf and leisure complex.

v) Internet search for vacant / available property

An internet search for vacant / available hotels, golf and country clubs or golf courses did not reveal any suitable sites.

vi) Existing Hotels

- a) Holt Hotel, Steeple Aston (3 star): 9 acre site in between Banbury and Kidlington. Sequentially classified as 'out of centre'. Currently contains 154 bedrooms and is defined as a 3 star rating. The only other hotel in the District with significant leisure facilities although these are limited to a leisure complex and 2 tennis courts. Unlikely to expand further since 68 of the rooms and the leisure facilities were only recently constructed. Given the more limited facilities and the fact that sequentially it is no better than Bicester HGS the site could not be regarded as being reasonably available or preferable for the proposed use.
- b) Mercure Whately Hall Hotel (3 star): Located within Banbury town centre and is therefore sequentially more preferable than Bicester HGS. The site has only limited space to expand (a 39 bedroom block approved in 2007 has not been

implemented). There are no leisure uses attached to the hotel and there is no space to provide golf facilities. The site is therefore not suitable for the proposed use.

- c) Best Western Banbury House Hotel (3 star): Located within Banbury town centre and is therefore sequentially more preferable than Bicester HGS. No leisure facilities are provided and there is no space to provide significant new facilities. The site is therefore not suitable for the proposed use.
- d) Weston Manor Hotel, Western on the Green (3 star): Located on the edge of Western on the Green in an out of centre location. Site is also within the Green Belt and therefore any significant expansion would be contrary to national Green Belt policy objectives. The site only has limited conference / wedding facilities. The site is therefore not suitable for the proposed use.
- e) Wroxton House Hotel, Wroxton (3 star): The hotel is located in an out of centre location on the edge of Wroxton Village. The site does not have any leisure facilities and only limited capacity for weddings and conferences (up to 120 people). The site is not suitable for the proposed use.
- f) Deddington Arms Hotel, Deddington: Located within Deddington Village in an out of centre location. No major leisure facilities. The site is not suitable for the proposed use.
- g) Bignell Park, Chesterton (3 star): Located on the edge of Chesterton Village in an out of centre location. No major leisure facilities. The site is not suitable for the proposed use.
- h) Tally Ho Hotel, Lower Arccott (3 star): Located on the edge of Lower Arccott Village in an out of centre location. Whilst there are wedding / conference facilities for up to 100 seated guests, there are no leisure facilities. The site is therefore not suitable for the proposed use. It should also be noted that 33No. rooms are proposed to be lost via application ref. 13/01576/OUT (Approved 19.09.14).

- i) Dashwood Hotel, Kirtlington (3 star): Small boutique hotel in centre of Kirtlington Village in an out of centre location. No major leisure facilities. The site is not suitable for the proposed use.
- j) Holcombe Hotel, Deddington (3 star): Closed in 2011 and planning permission granted for conversion to residential use.
- k) The Oxfordshire Inn, Bletchington (3 star): Small hotel located in Heathfield Village. Whilst there is an adjacent golf driving range and function hall, its Green Belt location makes it unsuitable on planning policy grounds for a development of the size envisaged. It should be noted that the Council granted planning permission for the loss of the entire hotel in November 2014.
- l) Cromwell Lodge Hotel, Banbury (2 star): Located in Banbury Town Centre. No major leisure facilities and no available space to provide equivalent facilities to those provided at Bicester HGS. The site is not suitable for the proposed use.
- m) Lismore Hotel, Banbury (2 star): Town centre location in Banbury but with no major leisure facilities. Not suitable for proposed use.
- n) Best Western Jersey Arms Hotel, Middleton Stoney (2 star): Out of centre location on the edge of village of Middleton Stoney. Limited conference and wedding event capacity and no leisure facilities. Not suitable for proposed use.
- o) Red Lion, Adderbury (2 star): Located in village of Adderbury in an out of centre location. No major leisure facilities within the site or adjacent. Not suitable for proposed use.
- p) Littlebury Hotel, Bicester (ungraded): Not suitable for the reasons set out in paragraph (iii)(a) above.
- q) The Kings Arms, Bicester (ungraded): Small hotel located within town centre. Limited function / event capacity (maximum 40) and no leisure facilities. The site is not suitable for the proposed use.

- r) Travelodge, Bicester (budget): Out of centre location next to Moto Service area at M40 junction 10. No major leisure facilities and not suitable for proposed use due to its location.
- s) White Horse Inn, Bicester: Small hotel with no leisure facilities. Not suitable for proposed use.
- t) Bicester Premier Inn, Bicester: Recently built hotel adjacent to A41 in out of centre location providing budget accommodation. No leisure facilities. Not suitable for proposed use.
- u) Holiday Inn, Banbury: Recently built hotel adjacent to junction 11 of the M40. No major leisure facilities. Provides accommodation for short business and travel and not suitable for the proposed use.

vii) Sites with planning permission but not completed

- a) Site C Ploughly Lane, Upper Arncott and Site D and E Ambrosden Road, MOD Bicester Ref:11/01494/OUT – This outline application which includes a hotel use as part of a much larger mixed use development is neither a town centre site or an edge of centre site. No hotel room numbers were provided with the application which was approved on 8th August 2014.
- b) Land adjacent to Oxford Council, Spicebill Park, Banbury (same site as Banbury 9 in emerging Local Plan) Ref: 13/01601/OUT. This town centre site proposes a 92 bedroom hotel as part of a larger scale redevelopment. The application is currently underdetermined.
- c) Franklins Yard, St Johns Street, Bicester. Ref. 14/00402/F. This application for 100 plus hotel rooms is part of a larger scale mixed use site within Bicester Town Centre. It is currently under construction.

7. CONCLUSIONS

7.1 No suitable and available alternative sites for a 62 bedroom hotel to meet the applicant's needs have been identified in either a town centre location or an edge of town centre location. Only one site in an out of town location appeared available to provide a golf hotel (Banbury Golf Centre). However, the site is further from a town centre than Bicester HGS and it could therefore be argued that this is sequentially less preferable than the Bicester HGS proposal. In addition there is no indication that other leisure conference facilities would be provided to bring it up to the standard of Bicester HGS. The hotel at Banbury Golf Centre does not have planning permission having been identified only as a 'suggested site' in an Issues and Options Paper in 2006. An appeal was also dismissed on the site for a hotel use. The remaining established hotel sites do not have the potential to meet the standards and facilities provided at Bicester HGS including The Holt Hotel which does not have a golf course or leisure facilities of the same standard. The limitations of the remaining hotel sites are set out below:

- A number are located in the Green Belt;
- Whilst a number of existing hotels are sequentially more preferable, the sites tend to be limited in size and therefore not capable of providing facilities to the standard and range of those at Bicester HGS which is a prime reason for staying at the hotel.
- Most of the hotels only focus on small scale weddings and conferences reflecting their limited size.
- All of the hotels that have been built are of a lower star rating than Bicester HGS and future expansion would not meet the need for additional top end accommodation.
- A number of hotels have planning permission but there is no indication that they will provide 4 or 5 star rated accommodation and none will be adjacent to a golf and country club leisure facility.

- 7.2 In addition to Banbury Golf Centre, there were no other suitable sites suggested in either the Bicester and Central Oxfordshire Site Allocations, the Banbury and North Cherwell Site Allocations or the Cherwell Submission Local Plan. Sites identified for hotels in the adopted and Non Statutory Local Plans have already been redeveloped and are therefore not available or suitable due to their location.
- 7.3 Under the terms of the National Planning Policy Guidance, an Impact Assessment is not required. Since the previous application for 51 new rooms was approved in 2013, the former PPS4 Practice Guide has been replaced the NPPF. This states that local planning authorities should consider the specific needs of the tourist industry including particular local or operational requirements. It is clear that when these are properly assessed there are no other suitable sites for the scale of accommodation envisaged.