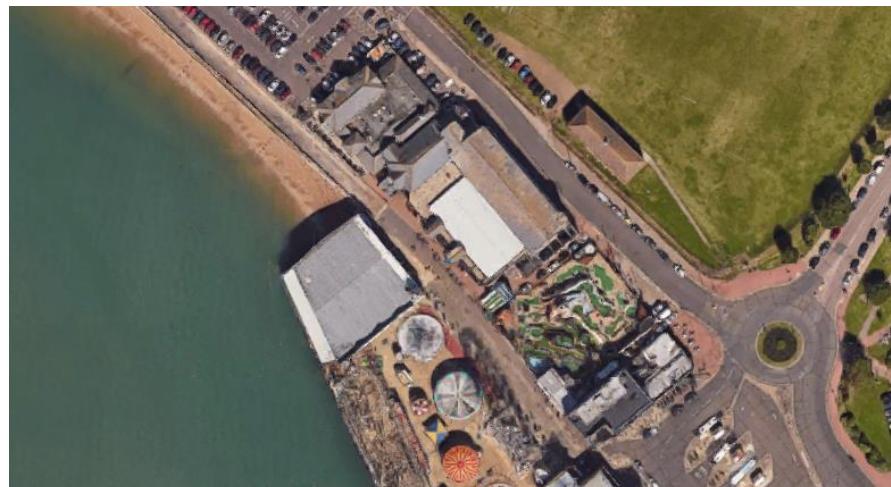


Planning, Design and Access and Heritage Statement

in respect of a planning application
seeking consent for
single storey ground floor extension

at

Southsea Island Leisure
Long Curtain Road
Southsea
Portsmouth
PO5 3AX



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APPENDICES

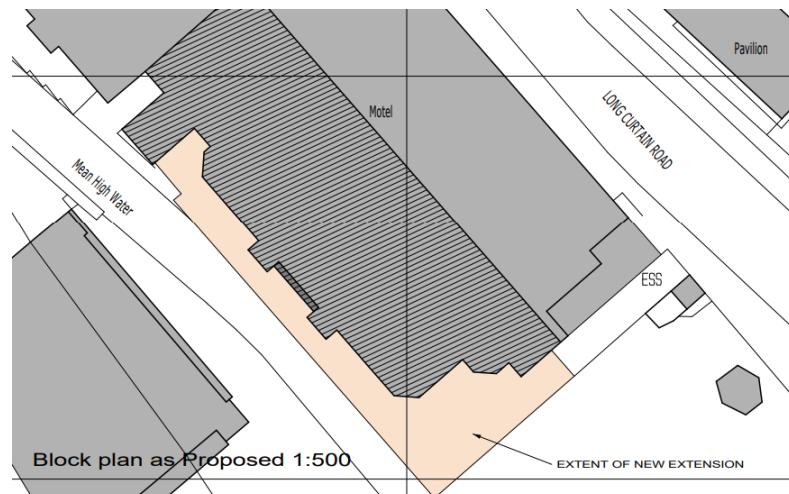
- A – Extract from Historic Environment Record Map

1. INTRODUCTION

- 1.1** This statement has been prepared to support an application which seeks planning consent to extend the existing amusement building with a front facing single storey extension.
- 1.2** This application seeks to identify all the possible constraints that may affect the site with a detailed assessment of all the issues.
- 1.3** Any relevant history of the site and locality is explained as a background to the interpretation and implementation of planning policy in this particular area.
- 1.4** Relevant national and local planning policy is referred to and the merits of the application discussed in this context.

2. THE PROPOSAL

- 2.1** This application seeks detailed consent to extend the existing amusement building with a front extension to provide additional floorspace, enlarged kiosk facilities and new front entrance points.



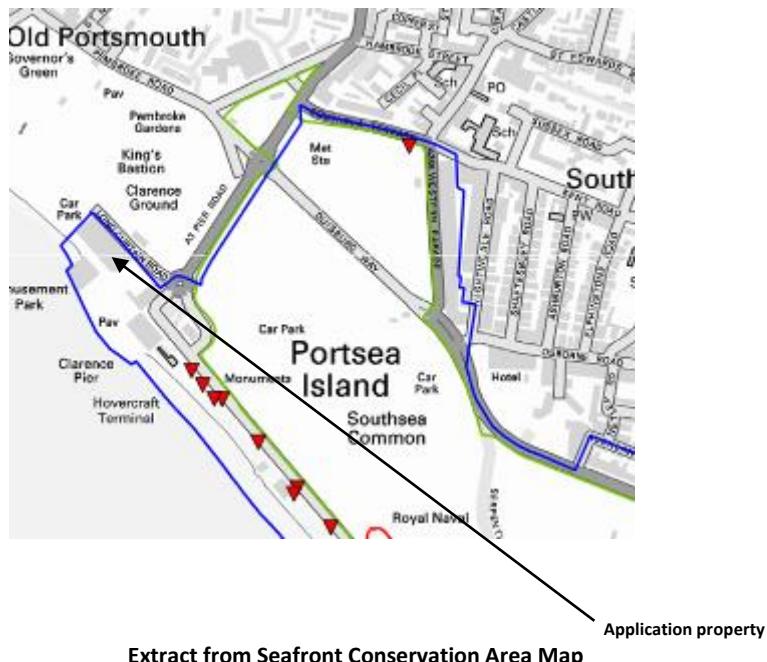
plan showing footprint of proposed extension

- 2.2** The proposal is required to increase space internally to provide greater circulation space for customers.

- 2.3 Externally the new build will comprise artificial cladding with powder coated aluminium frames supporting large, glazed areas on the front elevation.
- 2.4 The single storey element of the extension would run some 43 metres along the front of the premises with a depth of 5 metres with a two storey addition wrapping round the south eastern corner of the complex covering an area of approximately 10 metres by 18 metres which includes area of a small corner toilet block. The total additional floorspace provided is some 363 square metres.

3. THE SITE AND SURROUNDINGS

- 3.1 The locality is characterised by various amusement parks and leisure facilities including hotels, shops and take away food outlets located at the north western end of Clarence Esplanade. The seafront walkway routes in front of and through the application site and is served by extensive off road parking facilities.
- 3.2 The locality is generally hard surfaced with little street furniture or landscaping.
- 3.3 The site lies just within The Seafrot Conservation Area (10).



- 3.4 The building itself comprises yellow stock brick finish with red aluminium framed windows and extensive fascia signage under a balustraded viewing platform with open covered areas. The front building line is interrupted

with projecting shuttered reception areas and small individual stand alone kiosks.



Front elevation of existing premises

4. USE

- 4.1 The established use of the immediate area is one of entertainment and leisure activities.
- 4.2 The proposal seeks to expand an existing established amusement centre.

5. AMOUNT

- 5.1 Development of this site is not seen as being incompatible with the character of the area. The proposed addition is of modest scale providing additional ancillary floorspace within an unused area at the front of the premises.
- 5.2 The scheme does not materially impact on the locality or neighbouring land users. The meeting of these indicators suggests that the proposal represents an appropriate level of development for this particular site.
- 5.3 The development is able to make more efficient and effective use of unused land around the facility without causing harm to the character of the building, locality, or neighbouring land users.

6. LAYOUT

- 6.1 The scheme seeks to utilise the existing open land in front of the building to provide additional floorspace and related facilities.
- 6.2 The use has no implications for the existing layout of the building, its attendant space about or parking arrangements in the locality.
- 6.3 The plans indicate that the proposed works will not impact on the living or working conditions of adjoining or surrounding users or visitors to the site or locality.

7. SCALE

- 7.1 Given the extent of the existing building, the proposal represents a modest addition to the front of the premises reflecting and attaching to the existing single storey element fronting the main elevation.
- 7.2 The relationship with the main premises and its secondary massing will ensure successful assimilation within the area and streetscape as there is no visual conflict with the scale of development in the locality.
- 7.3 The existing building remains unaffected in terms of its streetscape massing.

8. LANDSCAPING AND TREES

- 8.1 There are no retained trees on the site that would be impacted upon.

9. APPEARANCE

- 9.1 The scheme uses a palette of modern materials incorporating a pragmatic appearance and design. As now it will continue to be read as an amusement centre building reflecting those buildings within the vicinity.



Proposed front elevation

10. ACCESS

- 10.1 There is no parking facility or access into the site.
- 10.2 Parking is generally available on street and in public car parks within the locality.

11. PLANNING POLICY CONTEXT

- 11.1 In considering application for development the LPA has a statutory duty under Section 38(6) of the Planning and Compulsory Purchase Act 2004 to determine applications in accordance with the development plan unless material considerations indicate otherwise.
- 11.2 Section 72 of the Listed Buildings and Conservation Areas Act 1990 (as amended) places a requirement on Local Planning Authorities (LPA) to pay special attention to the desirability of preserving or enhancing the character or appearance of Conservation Areas. In addition, LPAs are guided to allow greater flexibility in operating planning controls on changes of use to enable an area to be given increased vitality.

National Planning Policy

- 11.3 The National Planning Policy Framework (NPPF) was last updated in June 2019. This document sets out the Governments objectives for the planning system.
- 11.4 There are three dimensions to sustainable development namely economic, social and environmental. These roles should not be undertaken in isolation because they are mutually dependent. Economic growth can secure higher social and environmental standards and well-designed buildings and places can improve the lives of people and communities.
- 11.5 Proposals which accord with an up to date Local Plan should be approved unless there is conflict with those policies unless material considerations indicate otherwise.
- 11.6 The guidance advises, amongst other issues, of the need to secure high quality design, encouraging effective use of previously developed land, conservation of heritage assets and to support local strategies to improve health, social and cultural well-being for all.
- 11.7 With regards the historic environment, Section 16 (paragraph 192) reminds LPAs when determining applications to ensure that new

development makes a positive contribution to local character and distinctiveness. Where development leads to less than substantial harm to the significance of a designated heritage asset this harm should be weighed against the public benefits of the proposal (paragraph 196).

- 11.8 Good design is given increased importance and is a high-profile objective within the document at section 12.

The Development Plan

- 11.9 The policies of the adopted Portsmouth Plan (January 2012) constitute the statutory Development Plan for the purposes of considering this application. Objective 3 of The Plan seeks to promote and retain Portsmouth's strong economy and employment by '*providing tourist related facilities, including hotels, to support the visitor industry in areas linked to the city's waterfront and maritime heritage.*' The relevant policies are listed as below.
- 11.10 Policy PCS9 (The Seafront) seeks to encourage and support redevelopment of existing buildings for leisure and tourism and recognises that new development will contribute to the revitalisation of the seafront, tourism and the wider regeneration strategy for Portsmouth.
- 11.11 Policy PCS12 (Flood Risk) aims to reduce flood risk following guidance within PPS25 (now superseded) and Environment Agency Standing Advice.
- 11.12 Policy PCS23 (Design and Conservation) requires new development to be well designed whilst respecting the character of the city.
- 11.13 Southsea Seafront Strategy (2010) seeks to reflect the views of residents and businesses with regard to the seafront and identifies the area as one that should be vibrant with quality leisure facilities, events and activities all year round. The route through the funfair (Millennium Walk) is identified as being run down and not an encouragement to explore the route itself. The Action Plan supports seafront attraction businesses and the uptake of more concessions (S1.2).

Supplementary Planning Guidance

- 11.14 The Seafront Masterplan (2013) is adopted SPD and in its assessment of the locality of Clarence Pier recognises it has long been a popular destination for the seafront for leisure and recreation however the area is somewhat let down by its aesthetics and public space design. There are opportunities for comprehensive mixed use redevelopment schemes that

might help address these issues, this aspiration being carried forward within the emerging replacement draft document.

- 11.15 ‘Solent Recreation Mitigation Strategy (2017)’ seeks to alleviate the impacts of development on coastal bird populations by requiring developers to contribute to fund the implementation of management measures and monitoring. This strategy is more applicable to residential accommodation and schemes which are likely to generate more trips to the Solent SPAs.
- 11.16 Adopted SPD ‘Parking and Transport Assessments’ (2014) provides guidance on standards and design principles for car parking in both residential and non-residential developments.

12. SITE HISTORY

- 12.1 B*20649/AK (January 1998) – planning consent granted for an hotel, amusement centre, food and drink outlet and mini-golf facility in January 1998.

13. PLANNING JUSTIFICATION

- 13.1 The main material planning considerations relating to this application are considered to be;
 - (a) Development Plan Policy
 - (b) Impacts of the proposal on the locality and Conservation Area
 - (c) Flood Risk
 - (d) Any other relevant matters

Development Plan Policy

- 13.2 The premises is located within an established sizeable entertainment complex and contributes to the vitality of this commercial area.
- 13.3 The locality is identified as one providing tourist related facilities within the Portsmouth Plan whilst specifically Policy PCS9 encourages and supports leisure and tourism uses.
- 13.4 The Southsea Seafront Strategy SPD and Seafront Masterplan aim to ensure the locality provides quality leisure facilities whilst seeking to improve on the current quality of the streetscape and character of this

area of the seafront. The Action Plan aims to support existing seafront businesses.

- 13.5 Given the identified aims and objectives of the Development Plan and associated documents there can be no objection in principle to the modest extension of the existing amusement centre within this location.
- 13.6 It is therefore only necessary to consider any related detailed matters that arise from consideration of this application.

Heritage Statement

Impacts of the proposal on the character of the locality and Heritage Assets (Conservation Area)

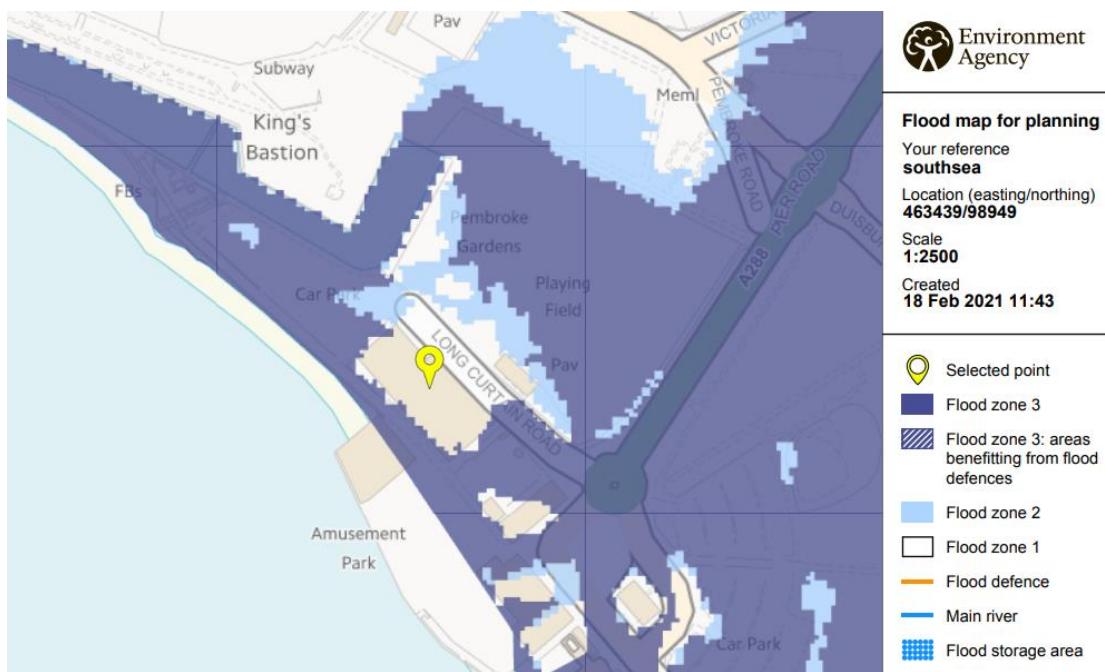
- 13.7 Section 72 of the Listed Buildings and Conservation Areas Act 1990 requires that an authority pay special attention to the desirability of preserving or enhancing the character and appearance of a conservation area.
- 13.8 Any assessment of the significance of any heritage asset affected should be proportionate to the assets' importance and no more than sufficient to understand the potential impact of the proposal on its significance (para 189).
- 13.9 The proposed addition will help to upgrade the existing façade of the facility which currently presents a rather jaded and tired appearance with an over dominant level of signage and paraphernalia attached to its front elevation. It comprises a mix of material finishes and colours. It fronts an open area of tarmacked ground which itself contributes little to the immediate area apart from providing space between leisure facilities.
- 13.10 The area itself is characterised by utilitarian buildings and structures of design and scale one would expect within a leisure complex of this nature.
- 13.11 The relevant Conservation Area Guidance (2006) notes that the most notable feature of this area is that it is almost entirely open space. Limited reference to the site states, '*A funfair occupies a substantial part of the pier area and recent redevelopment on part of the funfair site includes a hotel and a public house.*' There is little other specific guidance offered in respect of the application premises and surrounding leisure complex. It is recommended that alterations and extensions should be carried out in a sympathetic manner.
- 13.12 As required by the NPPF when assessing impacts on Conservation Area, as the proposal will lead to less than substantial harm to the significance of the designated heritage asset i.e., the Conservation Area, any such harm

should be weighed against the public benefits of the proposal which in this instance are the improvement, refurbishment and upgrade of the existing property and its continued viable use.

- 13.13 Legislation places a duty on the planning authority to pay special regard to the preservation of heritage assets. As the proposal will help ensure the continued maintenance and occupation of a significant leisure building the proposal fully accords with paragraph 192 of the NPPF in permitting a viable use consistent with the conservation of the area.
- 13.14 Given that the scheme will lead to less than substantial harm to the significance of this heritage asset it is clear that any such limited harm is clearly outweighed by the economic and public benefits of the proposal involving the improvement of facilities within the premises, thereby meeting the qualifying criteria of paragraph 198 of the NPPF.
- 13.15 The Historic Environment Records for the locality (radius 500m) have been obtained. Appendix A provides the relevant map and shows that there are no identified finds or items within 200m of the application site. The nearest items being MPM 460, 464 and 469 to the south, the Chesapeake Monument, Peel Monument and Trafalgar Monument, respectively. To the north lie the Spur Reboubt (MPM 37) and King's Bastion (MPM 1758). MPM 1127, the site of an anti-aircraft battery lies on the Common. The Scheduled Monument of the Long Curtain King's Bastion and Spur Redoubt ramparts and moat lie to the north west. Southsea Common is a Registered Park/Garden. None of these features or their surrounding characteristics are impacted upon.
- 13.16 The proposal is therefore seen as according with National and Local Heritage Policies by helping to ensure the long term care and maintenance of this tourism attraction by continuing to allow a viable use for the operator of the site.

Flood Risk Assessment

- 13.17 The flood map provided by the Environment Agency is produced below.



- 13.18 The premises lies outside a high risk area, within Flood Zone 1, but is surrounded by land that is high risk (dark blue).



- 13.19 A similar assessment is seen within DEFRA's 'Risk of Flooding from Rivers and Sea' dataset (above).
- 13.20 According to guidance flood risk assessments (FRAs) are only required for low risk sites larger than one hectare unless the area has critical drainage problems as notified by the EA. Nevertheless, it is considered prudent to assess the risk of flooding given the sites proximity to high risk areas. As advised within Planning Practice Guidance site-specific assessments should always be proportionate to the degree of flood risk making optimum use of information already available and also appropriate to the scale, nature and location of development.

13.21 The following points are relevant to note on this matter:

- The existing building lies within a low risk flood zone but adjoins land at high risk. However, as the use is considered to be 'Less Vulnerable' development is considered appropriate and there is no requirement to pass either the Sequential or the Exception Tests
- The site is flat with current finished floor level of the existing building calculated at 3.556m AOD
- The present day 0.5% probability (1 in 200 year) extreme tidal level for Portsmouth Harbour is 3.2m AOD (below the FFL) and the 0.5% probability extreme tidal level for this area in the year 2115 is 4.3m AOD.
- The extension will have identical finished floor levels to that of the existing building
- On behalf of the City Council, the Eastern Solent Coastal Partnership are undertaking the next generation of coastal flood defences in Southsea which involves land in the vicinity of the application site. This work will further reduce flood risk and the impact of climate change over the lifetime of the project
- The current operator has run the amusement centre since 1998 and in that time the property has not been subject to any flooding. Only land and property to the south-west on the opposite side of the accessway has been affected by flooding in the past, reflecting the zoning data within the EA flood map
- The use of the premises (assembly and leisure) is considered 'Less vulnerable' as categorised within the EA flood risk vulnerability classification guidance. Use a use is considered appropriate within all flood zones except within a functional flood plain (3b)
- The site is managed and monitored by staff at all times and only operates during normal daytime opening times with no overnight activity
- If required, evacuation from the building is straightforward and involves obvious routes both out of the building and to nearby high land
- The limited increase in surface water run-off will be accommodated within the existing buildings drainage system directed into the mains system serving the locality

- There will be no increase in the number of visitors at any one time given that the proposal is required to increase circulation space for existing facilities
 - The extension will be located on top of an existing hard surfaced area thereby having no impacts on existing flood storage capacity
 - The applicant is willing to introduce and implement a Flood Warning and Evacuation Plan and/or sign up to the EA's Flood Warning Service, which can be made a requirement of a suitably worded condition attached to any consent
 - As the proposal involves an extension to a long established amusement centre it is not considered appropriate or pragmatic to consider applying the sequential test in respect of alternative locations. Indeed as the development vulnerability is appropriate to the Flood Zone the sequential test can be considered adequately demonstrated. As the activity is only reasonably acceptable in land use terms and planning policy within the tourism area of the seafront, no other similar seafront site lies within a lower risk flood area. Indeed, this is one of the few seafront sites that lies outside flood zone 3
 - Similarly, it is not realistic to consider the possibility of a land use within a lower vulnerability classification i.e. 'Water-compatible'. Alternative uses such as retail shops, waste treatment works, minerals or sewage treatment works would not be appropriate within this tourism driving location.
- 13.22 Given the above considerations, the proposed use of the new extension is deemed appropriate for this location, generally according with Local Development Documents and with the additional measures proposed, this relatively minor addition will have no implications in respect of any resultant additional risk to life from flooding events nor increasing flood risk elsewhere in the locality.

Other planning considerations

- 13.23 With regards parking issues, adopted SPD 'Parking and Transport Assessments' (2014) advises that in respect of D2 uses the parking needs of both staff and customers will need to be assessed and combined to determine peak parking requirements. The threshold of 500 sq. metres is not reached therefore a Transport Assessment is not required.

- 13.24 It is important to note that the additional floorspace is required to provide extra space about existing facilities and amusements within the facility for improved customer experience.

Parking Provision Assessment

- 13.25 It is important to note that the additional floorspace is required to provide extra space about existing facilities and amusements within the facility for improved customer experience. The following paragraphs assess the parking considerations in respect to both customers and staff.
- 13.26 In addition, this facility is not in itself a specific generator of additional traffic movement as its customers will be visiting the locality for a variety of leisure activities and reasons. As the attraction is not a use which generates customers or associated traffic in its own right it is not considered reasonable for a proposal involving an extension to necessitate any traffic mitigation measures or additional parking provision. The locality is an established seafront leisure attraction which is fully supported by Planning Policy objectives.
- 13.27 In any event the site is located within a sustainable location served by several large public car parks and bus services and a significant number of visitors will be from the city centre where car ownership levels are lower.
- 13.28 The site lies within some 100/200 metres of bus services at Clarence Pier and within walking distance of services along and to the north of Southsea Common. The site is also served by nearby public car parks and lies on walkway routes from the city centre and train station.
- 13.29 The facility will increase space and distance between existing attractions housed within the expanded building. There is no intention or need to increase staffing levels and therefore there are no additional demands on existing parking provision. It will be noted that the owner of the application site also operates the adjoining golfing attraction, so staff are shared between facilities if required.
- 13.30 The site has the benefit of a rear service accessway off Long Curtain Road which remains unaffected.
- 13.31 Given the former uses of this building which would have attracted a much greater number of vehicle movements and the sustainability of the site and nearby local car park, the lack of parking does not represent a sustainable objection in the consideration of this proposal.
- 13.32 Given the circumstances of this particular site and operation, as provided for within the NPPF at paragraph 109, it is not considered the

development can be reasonably resisted on highway grounds as there is no unacceptable impact on highway safety or cumulative impacts on the road network.

Other matters

- 13.33 The application site itself is not subject of any known nature conservation or ecological interest and no Scheduled Monuments, Registered Parks or Gardens, or Listed Structures or buildings are impacted upon by the proposed development.
- 13.34 As no residential accommodation is proposed, payment in respect of the Solent Mitigation Strategy is not required.
- 13.35 The required form in respect of CIL liability accompanies the application.

14. CONCLUSION

- 14.1 All material considerations have been identified within this statement and addressed accordingly.
- 14.2 In summary the proposal can be supported as:
 - Supporting the continued viability of tourism use in this location in accordance with adopted planning policy
 - Improving the visitor experience for existing visitors by increasing circulation space
 - Raising no issues in terms of adverse impacts on the locality or Conservation Area
 - Having no harmful impacts on the character or appearance of the building or surrounding amusement park
 - Representing a safe form of development for visitors and staff whilst having no adverse effects on surrounding property
- 14.3 It is therefore respectfully suggested that as the scheme successfully addresses all policy issues and potential constraints and does not conflict with or harm adopted policies, the Local Planning Authority can support this scheme and grant planning consent accordingly.

