

From: David Rothery – on behalf of Chichester Harbour Conservancy (Area of Outstanding Natural Beauty team)

To: Tina Pickup – Local Planning Authority Planning Case Officer

Copy : Alistair Johnson – Submitting agent / applicant : SPA Creators (Reading)

The Langstone Hotel, Northney Road, Northney, Hayling Island, Hampshire

Planning Application: **APP/20/00485 (Amended 21 December 2020)**

Proposal for erection of modular clad portable building for health and wellness activities with replacement car parking (Resubmission of APP/19/00802 as Amended)

EMAIL SEEKING CLARIFICATION ON PLANS SUBMITTED

Please note - this is not the Chichester Harbour Conservancy's formal AONB consultation response. That will follow on receipt of a follow-up on this email enquiry.

Please note that this email message is considered suitable for open public view on LPA public access

Good Morning ,

I am the planning case officer considering the above planning proposal on behalf of the Chichester Harbour Conservancy. In preparing my assessment of the proposal, it has become apparent that the current details submitted for the construction of a new spa health and wellbeing structure on the hotel site are in need of some clarification. This clarification may require an **Extension of Time** to offer detailed consultation comment on the proposal (which is now in its fifth amended revised form). I note that our last comments were made on 14 July 2020 when considering the submission details as then made.

EXTERNAL LAYOUT AND LANDSCAPING DETAILS –

I note that the submitted site layout plan **LQPSP-SL** does not show the replacement car parking spaces that would be provided to account for the 16 lost car parking spaces (see satellite image on APP/19/00802 dated 13 Aug 2019) due to the proposed development. The previous site plan [also **LQPSP-SL**] did show a double bank of new parking spaces to the end of the existing car parking area and the connection to the southern long driveway that skirts the site (the replacement 16 spaces with a further 12 spaces to the east of the hotel) . As you are aware from the last consultation comments from CH AONB on 14 July 2020 we did not raise objection on the basis of this arrangement forming part of the overall proposal.

I note that whilst the current site layout plan shows no external works away from the proposed modular structure the focus of the proposal, the submitted landscape plan **LQPSP-LAN** does show landscape works including a new car parking arrangement. This parking bay adds on new spaces to the peripheral areas of the access drive to the existing carparking area (24 in total – 12 to the eastern side of the hotel and 12 to the southern long driveway). **Can you confirm that this is the parking layout to be considered** now.

EXTERNAL LIGHTING DETAILS AND THE DARK SKIES POLICY –

Re: letter 12 August 2020 from Kate Stanley, Consultations Team, Natural England and email 23 September 2020, from Amelia Cockings, Sustainable Development Advisor, Thames Solent Area Team, Natural England

I note that the submitted Exterior Lighting Statement includes confirmation that the pole mounted lighting columns to the existing car parking area will be retained in the areas of the car park away from the planned development. However, the submitted landscape plan [referred to above **LQPSP-LAN**] indicates that at least three existing pole mounted lights to the car park are to be removed and shows instead new low-level bollard lighting. **This needs to be clarified.**

In addition there would be new lighting to the spa health and wellbeing modular structure. The lighting document makes reference to Dark Skies (sensitivity paragraph under conclusions) and claims that the proposals would be acceptable within this concept. **I have significant concerns about this approach** as I note that there are aspects of the proposal which introduce lighting that would illuminate upwards, and therefore would likely be contrary to the aims of reducing electric lighting within the night sky. Page 4 of the document identified the following proposed works adding more lighting to the site –

- to the entrance to the development is a proposed water wall feature that will be up light with low voltage LED lights,
- the entrance will also have some floor up lighters on the decked entrance and the steps up to the entrance [Terra lights],
- the roof terrace will have up lighters within the deck [Terra lights],
- to the living wall there will be exterior lights [Dunbar lights with both up light and down light illumination cones],
- and new additional bollard [Napier lights]

In addition, the proposal also has large areas of glazing to the spa rooms. The Lighting Statement also makes reference to these on Page 2 as “ ***The large windows will also emit light from interior lighting at dark.***” There is therefore not acknowledgement of the Chichester Harbour Area of Outstanding Natural Beauty requirements for internal screening blinds to the windows, but in the contrary a seeming disregard of such stipulated requests for planning conditional controls for these element of the proposal.

The hours of operation are stated in the Application Form (Question 19) to be 09:30 am to 22:30 pm Monday to Friday with modified hours for other days. However, the submitted Lighting Statement refers to hours of 08:30 am to 22:30 pm (scale of change paragraph under conclusions). **Please verify which is correct.**

The Chichester Harbour Conservancy Area of Outstanding Natural Beauty (Joint Supplementary Planning Document -SPD), adopted by Chichester District Council on 16 May 2017 **requires applicants to develop lighting proposals that reduce the adverse impact of artificial light** as part of the Dark Skies policy approach (section 30). The planning agent should take note of this requirement as the current proposal does not appear to address this key policy approach.

You will also be aware of the Chichester Harbour Conservancy Area of Outstanding Natural Beauty Planning Principles (Management Plan version April 2019) – adopted by Chichester District Council on 5 March 2019, also seeks to **limit lighting to secure dark skies under Planning Principle PP09: Dark Skies**. The submitting agent should take note of this requirement.

MODULAR STRUCTURE POSITIONING AND ELEVATION TO ADDRESS FLOOD RISK CONCERN –

Re: letter 28 August 2020 from Sophie Brown, Sustainable Places Advisor, Environment Agency
I note that the consultation comments from the Environment Agency as subject to ensuring the Flood Risk measures are incorporated in the build out. This is namely to ensure that “***Finished floor levels will be set no lower than 4.61 metres Above Ordnance Datum (mAOD)***”. Whilst this is understood for the reasons provided, it is not clear if the submitted plans and drawings that make up the application accurately reflect this elevational requirement, as, as no AOD levels are indicated. If the drawings of the elevations do account for this, then this should ideally be added to the drawings for clarity. If, however if the drawings do not reflect this requirement, then the modular structure would potentially be raised higher on the land than is depicted, and could have a more significant appearance within the locality and to the AONB protected landscape. The submitted location plan (24 March 2020) indicated that the modular structure would have a maximum roof

height of no more than 7.5m from the ground and this is annotated on the elevational drawings. **This needs to be verified** and accurate drawings provided to reflect what elevation profile off the ground the structure would demonstrate to meet the Flood Risk floor level of 4.61m AOD.

Email circulation -

Please note that I have shared this email with the planning agent / applicant. Please satisfy yourself with the status of the information that we consider should be provided for clarity of the submitted case, and if you are in agreement, please request such of the applicants agent, so that we may be reconsulted with such information to offer a formal AONB protected landscape consultation response. An extension of time to enable comment may therefore be required.

The delay in making this comment results from the current limitations in the normal operational role and working practice of the CHC due to the coronavirus Covid-19 containment restrictions imposed for a safe workplace environment.

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