

**APP/18/01226 | Construction of an 81bed, four-storey hotel (Class C1), associated car-parking, landscaping and ancillary works. | Land off Larchwood Avenue (Former Stantons Yard), Larchwood Avenue, Havant**  
**Our ref – 276199**

Thank you for consulting Natural England on the additional information submitted for the above application.

### **Solent Recreation Mitigation Strategy / Bird Aware Solent**

*As you are aware, paragraph 6.10 of the Definitive Strategy states that 'New hotels and other holiday/tourist accommodation - defined as both wholly new establishments and extensions of existing ones - is a residential-related use with the potential to generate additional recreational visits to the SPA(s). The need for mitigation for new hotel accommodation will be assessed on a case-by-case basis by the local planning authority in relation to the 'tests' set out in the paragraph above. Mitigation is unlikely to be required for new hotel accommodation in a city centre for example, if the guests will predominantly be business people or those visiting the built heritage rather than the coast. On the other hand, mitigation is more likely to be required for new hotel accommodation close to a SPA where guests will probably spend some time walking or pursuing other recreational activities at the coast'.*

We note that the Travelodge development is located close to business sites and close to ferries to/from Portsmouth. In this case, Natural England is content for Havant Borough Council, as competent authority, to undertake the assessment to determine whether a contribution is required. We advise that the Habitats Regulations Assessment includes the assessment and justification based on evidence and expert opinion.

### **Water quality effects on Chichester and Langstone Harbours Special Protection Area and Solent Maritime Special Area of Conservation – further information requested**

There is existing evidence of high levels of nitrogen and phosphorus in the water environment with evidence of eutrophication at some designated sites. An Integrated Water Management Study for South Hampshire was commissioned by the Partnership for Urban South Hampshire (PUSH) Authorities to examine the delivery of development growth in relation to legislative and government policy requirements for designated sites and wider biodiversity. This work has identified that there is uncertainty as to whether new development in the plan period would require mitigation. The types of development covered include including new homes, student accommodation, tourism attractions and tourist accommodation including hotels, guest houses, bed and breakfasts and self-catering holiday chalets and static caravan sites. Further details are included in the attached methodology. Please note well-evidenced occupancy rates can be taken into account.

In light of this uncertainty, and to ensure the deterioration of the water environment is appropriately addressed in the Habitats Regulations Assessment, Natural England advises that a nutrient budget is calculated for this development. For confidence that the development will be deliverable, Natural England recommends that the proposals achieve nutrient neutrality.

### **Biodiversity Mitigation and Enhancement Plan – no objection subject to mitigation**

Natural England does not hold locally specific information relating to protected species, local or national biodiversity priority habitats and species, local sites (biodiversity and geodiversity) and local landscape character. These remain material considerations in the

determination of this planning application and we recommend that you seek further information from the [Hampshire Biodiversity Information Centre](#) and other appropriate bodies. In some instances, further surveys may be necessary through an ecological appraisal to be agreed by an HCC ecologist.

Natural England has published Standing Advice on protected species. Please note Standing Advice is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation. If you have any specific questions not covered by our Standing Advice, or have difficulty in applying it to this application please contact us at [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

In order for your authority to be assured that the proposal meets the requirements of the standing advice and the additional requirements for biodiversity enhancement and net gain as set out in National Planning Policy Framework paragraphs 8, 118, 170, 174 and 175d, Natural England recommends that the application is supported by a Biodiversity Mitigation and Enhancement Plan (BMEP), or equivalent, that has been agreed by a Hampshire County Council (HCC) Ecologist. The BMEP should be secured and implemented with any planning permission.

Natural England strongly recommends that additional enhancement measures are included in a BMEP for agreement with the HCC Ecologist, for example:

- ☐ Incorporating swift, house martin, sparrow and or bat boxes and bricks into the design of the new building
- ☐ Planting of native trees characteristic to the local area to make a positive contribution to the local landscape and biodiversity.
- ☐ Provision of fruit trees (eg apple, pear etc) and appropriate native species within gardens.
- ☐ Using native plants in landscaping schemes to provide nectar and seed sources for pollinators and birds.
- ☐ Installation of bee bricks on south-facing walls
- ☐ Creation of new species rich grasslands on road verges and amenity areas. The stripping of topsoil to reduce fertility prior to appropriate seeding has been demonstrated to produce attractive biodiverse grass verges that have significantly lower annual maintenance costs than the more typical improved amenity verges.

Please note that provided the Hampshire County Council Ecologist is satisfied with the submitted biodiversity mitigation and enhancement measures and the measures are secured by any permission then no further consultation with Natural England on this aspect of the proposal is required.

Should the developer wish to explore options for avoiding or mitigating effects on the natural environment with Natural England, we recommend that they use our [Discretionary Advice Service](#).

Please let me know if you need any further information or if you have any queries.

Kind regards

Rachel Jones  
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