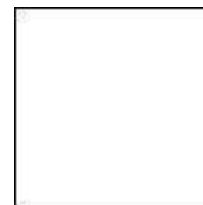


**TOWN AND COUNTRY PLANNING
ACT 1990 (AS AMENDED)**

**STATEMENT OF
HAVANT BOROUGH COUNCIL**

**Park Lodge
Hooks Lane
Havant
PO9 3DT**

**Local Planning Authority Reference:- APP/15/01414
Planning Inspectorate Reference:-
APP/X1735/W/16/3159212**



APPEAL BY Mr Greenhouse AGAINST REF Construction of two semi-detached houses. AT Park Lodge, Hooks Lane, Havant, PO9 3DT

Planning Inspectorate Reference: APP/X1735/W/16/3159212

LPA Ref: APP/15/01414

1.0 THE APPEAL SITE AND ITS SURROUNDINGS

- 1.1 The site lies to the west of Hooks Lane from which it would be accessed. To the west is the grandstand for Havant Rugby Club and to the east is Park Lodge a two storey dwelling which is understood to be occupied as a single dwelling with a number of individuals sharing facilities.
- 1.2 To the north of the site is the Rugby pitch and to the south is a pitched roofed amenity building.
- 1.3 The site for the proposed dwellings forms part of the former garden to Park Lodge and is now overgrown. The appeal site and its location are shown on the 1:1250 location plan attached at **Appendix A** and a Birds Eye view of the site and surroundings is provided at **Appendix B**.

2.0 PLANNING HISTORY

The Planning History in relation to Park Lodge is provided below:

APP/15/01390 - Application for Certificate of Lawfulness relating to existing use of the building as 1No. 4 bed maisonette and 1No. studio flat., REFUSED,11/02/2016

97/56733/003 - Single storey rear extension (revised application), PERMITTED,23/04/1997

96/56733/002 - Single storey rear extension, REFUSED,06/02/1997

92/56733/000 - Two storey extension to provide granny flat and additional bedroom accommodation., PERMITTED,05/05/1992

HWU/3446 - The erection of a groundsman's house at Hooks Lane, Bedhampton PERMITTED 30th December 1954

The application Ref: HWU/3446 decision notice and location plan are attached at **Appendix C**.

3.0 THE APPLICATION

- 3.1 The application was made valid on the 8th July 2016 (following re-validation) and seeks approval for the Construction of two semi-detached houses. The local planning authority issued a Decision Notice refusing planning permission on the 2nd September 2016 and a copy of this Decision Notice has previously been forwarded to the Inspectorate.

3.2 The Council's Decision Notice identified the following four reasons for refusal:

First Reason:

The proposed dwellings would due to their number, design and siting lead to a cramped form of development out of character with the established pattern of development which is dominated by sporting and recreational development. The proposal is therefore considered harmful to the character and appearance of the area and is contrary to policy CS16 of the Havant Borough Local Plan (Core Strategy) 2011 together with the National Planning Policy Framework.

Second Reason:

The proposed development would result in an unacceptable amount and quality of outside amenity space for the future occupiers of the proposed dwellings. The northern garden areas would be dominated by the existing Grandstand to the west of the site which would have an overbearing impact on these gardens and reduce light in particular to unit 1. Furthermore the siting of the dwellings adjacent to the Grandstand and Rugby pitch is likely to lead to an unacceptable relationship between uses by reason of noise and activity further detracting from the residential amenities of future residents. The proposal is therefore contrary to Havant Borough Local Plan (Core Strategy) 2011 policy CS16 together with Havant Borough Local Plan (Allocations) 2014 policy DM18 together with the National Planning Policy Framework.

Third Reason:

The proposed development would result in additional car parking provision within the curtilage of Park View which would be remote from the two proposed dwellings and would have a harmful impact on the residential amenities of the occupants of Park View by reason of additional noise and activity adjacent to that property unconnected to its occupation. The proposals would also appear to result in the need for physical alterations to Park View to accommodate the car parking which would further detract from existing amenities. The proposal also fails to provide adequate car parking to meet the Council's adopted minimum parking standards which is likely to result in remote parking to the harm of the amenities of future occupants. The proposal therefore conflicts with Havant Borough Local Plan (Core Strategy) policies CS16 and DM13, Havant Borough Council Parking SPD 2016, Havant Borough Council Borough Design Guide SPD 2011 and the National Planning Policy Framework.

N.B. Park View in the above reason should read Park Lodge,

Fourth Reason:

The proposal, without completion of the appropriate binding arrangements to secure a contribution towards the Solent Recreation Mitigation Project, is contrary to the Council's Policy on contributions towards measures of mitigation adopted by the Local Planning Authority. These seek to ensure that the provision is made from new development towards mitigating against increasing recreational pressure on the Solent SPA. The development is therefore contrary to policies CS11 and CS21 of the Havant Borough Local Plan (Core Strategy) 2011 and Policy DM24 of the Havant Borough Local Plan (Allocations) 2014 and the National Planning Policy Framework.

4.0 PLANNING POLICIES

- 4.1 The Development Plan comprises Havant Borough Local Plan (Core Strategy) 2011 and Havant Borough Local Plan (Allocations) 2014. In addition the National Planning Policy Framework sets the national framework for the consideration and determination of planning applications.
- 4.2 The following policies of the Havant Borough Local Plan (Core Strategy) 2011 are considered to be relevant to the determination of this appeal:

Havant Borough Local Plan (Core Strategy) March 2011

CS16	(High Quality Design)
CS17	(Concentration and Distribution of Development within the Urban Areas)
CS21	(Developer Requirements)
CS9	(Housing)
DM10	(Pollution)
DM13	(Car and Cycle Parking on Residential Development)

- 4.3 The following policies of the Havant Borough Local Plan (Allocations) 2014 are considered to be relevant.

Havant Borough Local Plan (Allocations) July 2014

AL1	(Presumption in Favour of Sustainable Development)
DM18	(Protecting New Development from Pollution)
DM24	(Recreational Disturbance to Special Protected Areas (SPAs) from Residential Development)

- 4.4 In addition the following adopted Supplementary Planning Documents are considered relevant:

Havant Borough Council Borough Design Guide SPD 2011
Havant Borough Council Parking SPD 2016

- 4.5 Where relevant policies from the above sources will be quoted in part 6 of this appeal statement.

5.0 REPRESENTATIONS

- 5.1 The application which is the subject of this appeal was published in accordance with the Council's adopted publicity procedures, and 4 neighbour notification letters were sent. In addition a site notice was posted. Representations were received from 1 third party. Copies of the representations received have previously been forwarded to the Inspectorate. A summary of the comments is provided below:

Summary:

Overdevelopment
Out of Character
Noise impact from Rugby Club use
Contrary to policy DM18 of Local Plan
Potential for noise complaints from residents which could constrain club's activities and sporting endeavours.
Contrary to policy CS16 which requires high quality design.
Could be garden to Park Lodge
Overlooking
Contrary to policy DM13 and AL1 - lack of parking and not sustainable
Cars could not be seen from house contrary to good urban design and Borough Design Guide and policy CS8
Inadequate private amenity space contrary to Borough Design Guide
Certificate incorrect
Street view misleading
Concern Rugby balls land in site possibly endangering young children.
Procedure in relation to Red line change questioned.

Comment:

The change in Red Line area was to allow for access to the public highway, the application was made 'subsequently invalid' in order that the red line and Certificate B and Notice No.1 could be served. The additional land in question is Havant Borough Council land. The revised plan and Cert B together with the service of the Notice allowed for the application to be re-validated. No prejudice was caused by this change and it is considered that this pragmatic approach was the most appropriate way of processing the planning application.

- 5.2 Consultation Responses were received in relation to the proposed development from the following consultees:

Development Engineer (Highways)
Waste Services

Copies of the Consultation Responses received have previously been forwarded to the Planning Inspectorate.

6.0 PLANNING CONSIDERATIONS

- 6.1 Having regard to the relevant policies of the development plan, and the reasons for refusal given in the Decision Notice dated 14th September 2012, it is considered that the main issues for consideration are:

First Issue:

Whether the proposed dwellings would due to their number, design and siting lead to a cramped form of development out of character with the established pattern of development which is dominated by sporting and recreational development.

Second Issue:

Whether the development would result in an unacceptable amount and quality of outdoor amenity space for future residents. Furthermore is the siting adjacent to the Grandstand and Rugby pitch likely to lead to an unacceptable relationship between uses to the harm of the residential amenities of future residents.

Third Issue:

Are the proposed car parking arrangements acceptable in terms of their location, and impacts on residents of Park Lodge. Furthermore is an adequate amount of car parking provided.

Fourth Issue:

Whether the proposals adequately address the impacts of additional recreational pressures on the Solent Special Protection Area.

First Issue

- 6.2 The site is located within the urban area where further residential development is considered acceptable in principle subject to the usual development management criteria.
- 6.3 The proposal is to provide a semi-detached pair of dwellings on a site located between Park Lodge (originally built as a groundsman's house linked in use to the maintenance/management of the recreation ground) and the Grandstand of Havant Rugby Club. There are other community buildings to the south.
- 6.4 Havant Borough Local Plan (Core Strategy) CS16 relates to High Quality Design and requires that all development should demonstrate that its design meets a number of criteria. The most relevant of which are considered below:

1. Responds to, draws inspiration from and respects local context and:

a) Identifies and responds positively to existing features of natural, historic or local character within or close to the proposed development site;

b) Integrates with existing local landscape features, promotes wildlife and biodiversity and/or applies characteristics of the local area into the design of a scheme wherever possible to create variety and interest;

c) Uses the characteristics of the locality to help inform the design of the new development including heights, massing, existing buildings lines, plot widths and depths, materials and proportions of windows and doors;

These criteria emphasise the need for development to respect local context. It is not considered that this is achieved as set out in the considerations below.

- 6.5 The National Planning Policy Framework sets out Core Planning Principles in paragraph 17 which planning should achieve including the requirement to:

always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;

The nature of the current proposal is considered below in relation to this overarching context.

Part 7 of the NPPF relates specifically to design and states:

The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

Planning policies and decisions should aim to ensure that (amongst other matters) developments:

will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;

The NPPF therefore emphasises the importance of respecting the context for a development in the consideration of design, the context of the site and the appropriateness of the proposed development is considered in more detail below.

- 6.6 The site is constrained in terms of its site area measuring some 238sqm (based on applicants block plan). The provision of two dwellings on the site would represent a density of development of approximately 84 dwellings to the hectare. The density of the development is demonstrated by the very limited external amenity space retained around the buildings. The two storey, two bedroom dwellings on this restricted plot are considered to represent an overdevelopment of the site.
- 6.7 The site is located within a complex of sporting and leisure/recreational uses and buildings. This includes Havant Rugby Club including the Grandstand which includes club facilities which is immediately west of the site and within 3.5m of the proposed western most dwelling, The Rugby pitch itself immediately to the north of the site, community facilities immediately to the south of the building and St Johns Ambulance and Scout Hut beyond Fraser Road to the South-West. The only dwelling within this complex is Park Lodge which historically was built as a groundsman's house linked to the sports and leisure facilities.

- 6.8 In this context the proposed residential development unconnected to the existing uses would be out of character with the existing pattern of sporting, recreational/leisure development which would lead to a number of other issues explored further in relation to the second reason for refusal. In terms of the pattern of development, this contrast between residential and other uses and building scale and type would lead to an unacceptable juxtaposition to the harm of the established character and appearance of the area.

Second Issue:

- 6.9 The second issue relates to concerns in relation to the quality of residential amenity that would be afforded to future residents.
- 6.10 In relation to the policy background to this issue, Havant Borough Local Plan (Core Strategy) 2011 policy CS16, Havant Borough Local Plan (Allocations) 2014 policy DM18 and the Havant Borough Council Borough Design Guide SPD 2011 are considered particularly relevant to the consideration of this appeal.
- 6.11 Policy CS16 states that, *Planning permission will be granted for development that is designed to a high standard, which helps to create places where people want to live, work and relax.* Furthermore, all development should demonstrate that its design, *Uses the characteristics of the locality to help inform the design of the new development including heights, massing, existing buildings lines, plot widths and depths.....*
- 6.12 In addition development should produce *a positive relationship between buildings, street and spaces both existing and proposed.....*
- 6.13 Policy DM18 relates to protecting new development from pollution stating:

Planning permission will be granted for development provided that projected levels of air, noise, vibration, light, water or other pollution do not have significant negative affect on the amenity of future occupiers or users of the proposed development.

This will be explored further in relation to the relationship between residential use and adjacent uses below.

- 6.14 Council Borough Design Guide SPD 2011 provides further guidance in relation to residential development and states in paragraph 1.04 that *The SPD aims to raise the quality of design across the Borough by providing detailed guidance that supplements and helps to implement Core Strategy Policy CS16 High Quality Design.*

In paragraph 5.05 it is stated that *Garden length should normally allow 10 metres between the dwelling and the boundary.* Paragraph 5.13 continues in relation to houses stating that, *As stated, the garden of a two storey home should be a minimum of 10 metres in length to provide appropriate daylight and to minimise overlooking, with an additional 4 metres for every storey added. Clearly there may be exceptions to this rule, depending on the local context, for example in urban areas there may be a historic pattern of development that dictates otherwise, such as three storey townhouse served by small courtyards of 10 metres rather than large gardens of 14 metres plus.*

- 6.15 The NPPF states in paragraph 17 that a Core Planning Principle is that planning should always *seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;*

- 6.16 In relation to the residential amenity of the proposed occupants the Local Planning Authority is concerned in relation to both the amount and quality of outside amenity space. The dwellings proposed are two bedroom properties and are therefore designed for family occupation. The Ground Floor plan provides the most accurate indication of garden sizes. From this it can be seen that the rear gardens (which back onto a public pedestrian route and car park to the south-west) would be 4m in depth x approx 5.9m in width for both properties. The front gardens facing the Rugby pitch and facing north would have dimensions of depth of between 7.4m and 6.7m (western plot) and between 6.7m and 6m (eastern plot) and a width of 5.748 (western plot) and 5.777 (eastern plot). The garden depths fall significantly short of those recommended in the Councils Design Guide SPD and this is exacerbated by the restricted widths of the gardens.
- 6.17 In considering the outdoor amenity space provided it is also necessary to consider the impact on the usability of the space of the adjacent Rugby Club Grandstand. The slightly larger front garden areas as already stated face north and are therefore already compromised in terms of light by the proposed two-storey pitched roof dwellings. The Grandstand is positioned to the west of the site and is a tall and bulky structure which occupies much of the depth of the site and is located between 3.5m and 4.5m from the western proposed dwelling unit. The presence of this building would dominate the proposed properties appearing overbearing and oppressive especially to the western proposed dwelling. It would further compromise afternoon light to the front garden.
- 6.18 The location of the residential units in such close proximity to the Grandstand and rugby pitch is considered to be unacceptable. The noise and activity connected to the existing sporting/recreational use (further details of which are provided by the third party representations previously forwarded to the Planning Inspectorate) are considered to impact directly on the residential amenities of future residents. It should be noted that during the course of the application an acoustic assessment was requested from the applicants agent but this was not provided.

Third Issue

- 6.19 The third issue relates to car parking and to associated impacts on both the future residents and existing residents at Park Lodge. Havant Borough Local Plan (Core Strategy) 2011 policy CS16 states that all development should demonstrate that its design, amongst other matters *does not cause unacceptable harm to the amenity of neighbours through smell, the loss of privacy, outlook, noise and overlooking*. Havant Borough Local Plan (Allocations) policy DM13 relates to residential car parking and states:

Residential development will only be permitted where it provides car parking and cycle storage in accordance with the standards set out in the Residential Car Parking and Cycle Provision Supplementary Planning Document.

- 6.20 No direct vehicular access has been provided to the proposed site and the properties would be accessed via existing paths. The Havant Borough Council Parking SPD 2016 sets out the Councils car parking standards and requires a minimum of 2 parking spaces for a two bed dwelling. The requirement is therefore for a total of 4 car parking spaces.
- 6.21 The Proposed Site Plan P010 indicates that two parking spaces are to be provided off site and within the retained curtilage of Park Lodge with parking to serve the existing dwelling also shown. The proposed parking to the front of Park Lodge (south) would result in the removal of vegetation/hedges and would result in parking that is unconnected to the occupation of Park Lodge being positioned immediately adjacent to Park Lodge door and windows and would also result in the removal of parts of the existing building. This is considered to be a contrived arrangement and the car parking for the new dwellings would have an unsatisfactory relationship to Park Lodge. This is considered harmful to the residential amenities of the occupants due to noise, disturbance and associated activity immediately adjacent to the existing dwelling.

- 6.22 The siting of the sub-standard car parking away from the proposed dwellings further detracts from the amenities of the future occupiers and raises concerns in relation to security. Whilst it is recognised that there is off site car parking nearby, this raises the same amenity issues and it is also understood that this parking is busy on match days. Parking surveys were requested during the consideration of the application but were not submitted.
- 6.23 In relation to the third issue it is considered that the proposed car parking provision is unacceptable.

Fourth Issue

- 6.23 With regard to the impact on the Solent Special Protection Area, this development would increase the number of dwellings within the 5.6km zone identified as significant in potentially increasing recreational pressure on the Solent SPA. Natural England's advice with regard to all new housing development within this zone is that it is likely to have a significant effect on the SPA. The measures of mitigation adopted by the Local Planning Authority at the end of June 2014 requires a payment of £176 per dwelling to the Solent Recreation Mitigation Project – this is to secure accordance with Policy DM24 of the Havant Borough Local Plan (Allocations) 2014.
- 6.24 Havant Borough Local Plan (Core Strategy) 2011 sets out the Council's general approach in relation to environmental protection stating that:

Planning permission will be granted for development that (amongst other matters):

Protects and where possible enhances the borough's statutory and non-statutory designated landscape, habitats and features of biological, hydrological or geological interest. Protection and enhancement will be achieved by appropriate adaptation and mitigation measures including wardening, education and information and the creation of new habitats, water bodies/courses planting of new trees and woodland.

Has particular regard to the following hierarchy of nature conservation designations within the borough (as identified on the Proposals Map):

(i) Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar [International].

(ii) Sites of Special Scientific Interest (SSSI) and National Nature Reserves [National].

(iii) Sites of Importance for Nature Conservation (SINC), Local Nature Reserves (LNR), other Ancient Woodland not identified in (ii) above [Local].

Incorporates partnership working with conservation organisations to improve public understanding of biodiversity and to manage public access to designated sites, particularly on the coast, to reduce harm to nature conservation interests.

Responds to the emerging evidence from the Solent Disturbance and Mitigation Project, the published recommendations, and future related research.

- 6.25 The Principal of securing developer contributions is set by policy CS21 of the Havant Borough Local Plan (Core Strategy) 2011 which states that:

Development will be permitted if on-site and/or off-site infrastructure requirements are met.

Where new or improved infrastructure is essential for planning permission to be granted the council will require the on-site or off site provision and/or contributions through planning obligations, agreements or tariffs in accordance with the relevant legislation for off-site provision. The need for contributions will depend on information and advice from infrastructure providers on the expected impacts of the development on all the infrastructure types.

6.26 Policy DM24 of the Havant Borough Local Plan (Allocations) 2014 states that:

Planning permission will be granted for residential developments that avoid or mitigate a likely significant effect on the SPAs, caused by recreational disturbance through the in-combination effect of net additional dwellings. This mitigation can be provided through:

a) A financial contribution...

Where these measures cannot be provided development proposals will be refused, unless the applicant can show, subject to meeting the tests of the Habitats Regulations, that there would not be an adverse effect on the integrity of the SPAs.

The applicant has not at this stage provided the financial contribution required to meet this contribution requirement.

7.0 COMMENTS ON THE GROUNDS OF APPEAL

7.1 It is considered that most of the planning merits comments have already been addressed above and therefore to avoid repetition the following comments relate only to matters not covered above.

7.2 It is noted that in paragraph 4.6 the agent confirms that the proposal provides family housing. It is considered that this confirms the need for appropriate levels of external amenity space to meet the needs of this accommodation.

7.3 In paragraph 4.14 it is stated in relation to the Borough Design Guide that paragraph 5.13 is *tempered somewhat by the PUSH standard*. It should be noted that the PUSH document provided is a Draft dated April 2011. The Havant Borough Council Borough Design Guide SPD December 2011 is an adopted SPD and takes account of PUSH stating:

PUSH and Good Design

PUSH is a partnership of the unitary authorities of Portsmouth and Southampton; Hampshire County Council and the district authorities of Eastleigh, East Hampshire, Fareham, Gosport, Havant, New Forest, Test Valley and Winchester. PUSH is dedicated to delivering sustainable, economic-led growth and regeneration to create a more prosperous, attractive and sustainable South

PUSH Quality Places

PUSH considers it crucial that new developments deliver quality places to live, work and enjoy. Local authorities have been working together to deliver this agenda. This includes sharing good practice, the delivery of a Design Charter and a joint framework for a design SPD. The SPD framework has been used to inform the production of the Havant Borough Design Guide SPD.

It is therefore clear that the adopted Havant Borough SPD is considered clearly relevant to the consideration of this appeal.

7.4 In paragraph 4.18 it is stated that Park Lodge was the applicants former home and that there were no statutory noise complaints made by them or their tenants against the Rugby Club. This property was originally linked to the recreational uses being built as a groundsman's house. The current appeal is for the introduction of two new properties set adjacent to the Grandstand with the noise from spectators, players, tanoys and functions impacting directly on the potential new residents. It should be noted that an acoustic assessment was requested during the consideration of the application, however this was not provided.

7.5 Paragraph 4.20 states that the *maximum car parking requirement is 2 spaces per dwelling*. The Councils Car Parking Standards require a **minimum** of 2 parking spaces per 2 bed dwelling.

- 7.6 Paragraph 4.22 makes reference to the sustainability of the site, however the car parking standard for this location is for two spaces per unit (the sustainable Havant and Waterlooville Town Centres require a lower parking standard). Comment is also made in relation to on street parking being available. Such parking would be remote from the site and could have negative impacts on amenity.
- 7.7 Paragraph 4.24 comments on the demolition of a dilapidated brick built shed to Park Lodge and suggests that this will improve the properties appearance. This structure is brick built and attached to the main dwelling. As can be seen from the photographs at **Appendix D**, the structure has an acceptable appearance from outside the site. The removal of the structure and the car parking proposed would open up the frontage of Park Lodge removing hedging and impacting on the privacy of the dwelling in a location which is used by pedestrians. The structures use and amenity value to residents of Park Lodge can be assessed as part of the Planning Inspectors site visit.
- 7.8 Paragraph 4.25 relates to the SRMP contribution and it is noted that the requirement for a contribution is accepted. The agent states that the requirements can be secured by a pre-commencement condition.

Planning Practice Guidance in relation to the Use of Planning Conditions states:

No payment of money or other consideration can be positively required when granting planning permission. However, where the [six tests](#) will be met, it may be possible use a [negatively worded](#) condition to prohibit development authorised by the planning permission until a specified action has been taken (for example, the entering into of a planning obligation requiring the payment of a financial contribution towards the provision of supporting infrastructure).

Given the comment that 'it may be possible' and bearing in mind the requirement to limit the use of planning conditions, the Council have introduced a straightforward unilateral agreement procedure in relation to securing contributions to the SRMP for small scale residential developments. The agent has been provided with details. If such a contribution is provided via the unilateral procedure in good time during the appeal process the Local Planning Authority would be able to confirm that the fourth reason for refusal could be satisfied.

8.0 CONCLUSIONS

- 8.1 In conclusion it is considered that the proposal would represent a cramped form of residential development adjacent to sporting/recreational uses and would detract from the character and appearance of the area. Furthermore, the proposals provide inadequate private amenity space and would have an unacceptable relationship to existing uses. Car parking provision is poorly located, sub-standard and harms existing residential amenities. The development does not mitigate impacts on the SPA from increased recreational pressure on the Harbours.
- 8.2 Given the above conclusions and statement the Inspector is respectfully requested to dismiss this appeal. A list of recommended conditions should the appeal succeed will be forwarded to the Inspectorate.

9.0 Appendices:

Appendix A: 1:1250 Location Plan

Appendix B: Aerial Birds Eye View of Appeal Site

Appendix C: Planning History of Park Lodge

Appendix D: Photographs of Park Lodge building to be demolished to provide for parking

APPENDIX A

**APPEAL – Park Lodge
Hooks Lane
Havant
PO9 3DT**

**LPA REF:-15/01414/
Planning Inspectorate Reference:-
APP/X1735/W/16/3159212**