



The Studio, 4th Floor, No. 1 St Ann Street,
Manchester, M2 7LG

Tel: 0161 933 7680

e-mail: amandaolley@summitassociates.co.uk

Havant Borough Council
Planning Services
Public Service Plaza
Civic Centre Road
Havant
Hampshire
PO9 2AX

By e-mail

Our Ref: 1122.9.TGD.AJO.Fn

Your Ref: APP/18/01226

21st June 2019

F.A.O. David Eaves, Principal Planning Officer

Dear David,

Re: Application Ref. APP/18/01226
Construction of an 81-bed, four-storey hotel (Class C1), associated car-parking,
landscaping and ancillary works
Land off Larchwood Avenue (Former Stantons Yard), Larchwood Avenue, Havant

Following our ongoing exchanges, we write to provide further information and clarification,
following receipt of your updated correspondence of 8th April 2019.

For ease of cross-reference we have again followed the same order of issues as set out in
your correspondence.

Sequential Test & Impact Assessment

Sequential Test

It is noted that on balance, the Authority now considers that the Sequential Test is met given
the lack of sites in the town centres and the position in relation to the likely timescales and
uncertainty over delivery at the BAE site.

SUMMIT Planning Associates Ltd

Registered Office: Clifton Square, Clifton Street, Alderley Edge, Cheshire, SK9 7NW

Company Number: 7721331 Registered in England and Wales

www.summitassociates.co.uk

Design, Layout and Landscaping

Pedestrian Route

Following consideration of the ongoing update provided in this regard, further amended plans were submitted to you, by e-mail, on 1st May 2019. This shows that the proposed pedestrian route referred to has been further amended to re-work the ground floor layout and shows a clear walkway through the site. It is mainly the ground floor plan that is affected, but for the sake of completeness a set of revised floor plan drawings were submitted to fully update the submitted drawing package. The submitted amended drawing numbers were;

Drawing No. 4321-AL(0)110 RevM – Ground Floor Plan Proposed;
Drawing No. 4231-AL(0)111 RevH – First Floor Plan Proposed;
Drawing No. 4231-AL(0)112 RevH – Second Floor Plan Proposed;
Drawing No. 4231-AL(0)113 RevH – Third Floor Plan Proposed; and
Drawing No. 4231-AL(0)114 RevD – Roof Plan Proposed

Retaining Wall – Southern Boundary

Your agreement that the detailed design of this can be covered by planning condition is noted.

Boundary Details

Your agreement that these details can be covered by planning condition is noted. As also requested, the Tree Protection Plan submitted with this enclosure (Drawing No. 18-0609.04 Fig. 1), also indicates where the gabion wall structure will fall within the root protection areas of boundary trees.

Soft Landscaping

Your agreement that these details can be covered by planning condition is noted.

Hard Landscaping

Your agreement that these details can be covered by planning condition is noted.

Drainage

Following clarification of the points set out in your correspondence of 8th April, we submit further information to respond to the further consultation comments of Hampshire County Council, dated 1st May 2019. The additional enclosures in this regard comprise of;

1. Updated Drainage Strategy Statement (17th May 2019); and
2. SuDS Drainage Operations and Maintenance Manual (13th May 2019)

In summary, the requested information in relation to the microdrainage calculations and the latest version of Drawing No. 92000, are enclosed at Appendix H of the Updated Drainage Strategy Statement. The Drainage Exceedence Plan is enclosed at Appendix J of the Updated

Drainage Strategy Statement. A copy of the Operations and Maintenance Manual is enclosed.

This should now satisfy the County Council and the LLFA that their outstanding comments have been addressed.

Arboricultural Information

As referenced above in relation to 'Boundary Details' a Tree Protection Plan (Drawing No. 18-0609.04 Fig. 1) and accompanying Statement is enclosed with this submission.

The final details of the surfacing have yet to be confirmed and can be the subject of an appropriately worded planning condition. The Applicant can agree in principle that an appropriate material will be used in the interests of protecting root protection areas where necessary.

Highways Matters

It is noted that the full Interim Travel Plan will be secured by planning condition and that the final version will need to take account of the comments made by the Council's Environmental Officer, as previously advised.

Ecology/ SPA Impacts

It is noted that the County Ecologist is now satisfied insofar as Dormouse issues are concerned and that appropriate planning conditions have been requested. We would appreciate sight of the draft wording for such conditions in due course.

Impacts on Ancient Woodlands/ SINC/ Trees

The comments of the County Ecologist are noted, insofar as they relate to surrounding woodland and a landscaped buffer along the site boundaries.

It has been confirmed previously that a landscape buffer is not practical in this instance given the small and already constrained nature of the application site. The County Ecologists concern regarding further development pressure and deterioration of Woodland and the SINC located approximately 200m to the south of the site are unfounded. The application site is tightly constrained on all boundaries by either neighbouring commercial development or local infrastructure. As such, there are no reasonable grounds to consider that the development of the site will put further development pressure on the Woodland or encourage the further deterioration of it. The application site is a one time development proposal. There is no further land that might result in subsequent phases of development. It is an isolated brownfield site that is being brought forward for redevelopment in a well-established commercial area. This is further supported by the retaining wall works that are required as part of the proposal. There are no reasonable grounds upon which to withhold a grant of planning permission based on the comments of the County Ecologist in this regard.

I would also add that, acting upon your suggestion, attempts were made to contact the County Ecologist to discuss this, with no response forthcoming.

As agreed above, soft landscaping details to define the setting of the site will be secured by an appropriately worded planning condition.

SRMS Strategy (Impacts on the SPA)

Your confirmation that the Authority will unlikely be seeking a financial contribution in relation to this matter, is noted.

Nutrient Budget

This has obviously been the issue that has evolved quite significantly through the current duration of the application and we are of course aware of the wider constraint it is placing on the Authority and its ability to determine both residential applications and those applications for overnight accommodation.

As you are aware, we submitted our 'Nitrogen Budget' report to you on 14th May 2019. This confirmed the calculation insofar as the application proposal is concerned and the perceived impact of this. From our ongoing conversations, we understand that there seems to be no fundamental concern or objection to our calculation itself. Can you confirm if this has also been forwarded to Natural England for their formal consultation response. The issue arises in relation to proposed mitigation that can be secured to offset the additional nitrogen contribution to the water environment and particularly the water quality in the Solent, which is a European nature conservation designation.

Given Natural England's position that even a single dwelling is considered to have 'an impact' we understand that the 'de-minimis' position advocated in our report will not be accepted in principle. The current publicly stated position in Natural England's own working draft methodology document is that beyond 2020, they are unable to demonstrate with certainty that there would be no adverse impact on European nature conservation designations. As such, this should mean that any development becoming occupied or operational before the end of 2020 is not perceived to have an adverse impact on a European nature conservation designation.

However, whilst not issuing any public statement to justify such, we understand that Natural England have also tightened their position in this regard and consider that all qualifying applications under consideration are considered to have an adverse effect unless appropriate mitigation can be secured.

The matter of mitigation extends beyond just the limits of individual planning applications and as such requires a strategic approach because it essentially means that an avoidance and mitigation package will be required for almost all qualifying proposals.

At this time, we are aware of the Authority's draft Position Statement that has been presented to Cabinet and the proposed interim approach of utilizing a Grampian Condition that will allow the Authority to start unlocking the backlog of planning applications. In this regard, the Applicant needs to understand what the general process will be to calculating an appropriate financial contribution and the timescale that this is likely to take. We would welcome your further feedback in this regard, now that the Authority seems to have unlocked a potential way forward.

Sustainable Construction

The comments of Planning Policy and the acceptance of the BREEAM assessment is noted.

At this stage, we trust that the additional information has adequately addressed the outstanding comments and trust that this is still moving us towards a positive recommendation. As such, could we also request that a list of draft planning conditions be provided for review and comment as part of the ongoing process?

If you need to discuss further in the meantime, please do not hesitate to contact me.

Yours sincerely



Amanda Olley MRTPI
Director

On behalf of Summit Planning Associates Ltd

Encls. Drawing No. 18-0609.04 Fig.1 – Tree Protection Plan (& accompanying Statement)
Updated Drainage Strategy Statement (170519)
SuDS Drainage Operations and Maintenance Manual (130519)