

APP/25/00162) & LISTED (HBC APP/25/00176) BUILDINGS CONSENT APPLICATIONS.

Background:

The damage [REDACTED] resulting from Storm Kathleen (2024) was the most extensive and costly to any property in Langstone. Repairs will take over 2 years to complete, with the profound consequential disruption, emotional and financial impact to [REDACTED] likely felt far beyond.

Revised Situation:

[REDACTED] acknowledges the latest comments made by the Applicant to the Planning Authority relating to objections submitted by Interested Parties [REDACTED] against various aspects of the original (2025) Planning Application. In carefully weighing their value, [REDACTED] considers that when set specifically against the original set of objections [REDACTED] the Applicant has made no substantive amendments to their Planning (and Listed Consent) Application at F4. It is therefore a source of great sadness that despite having suffered the terrible aftermath of flooding, [REDACTED] **MAINTAIN** its **OBJECTION** to the Applicant being granted Planning and Listed Consent.

It is the opinion [REDACTED] that contrary to the exhaustive volumes of (for example) social and ecology policy detail provided by the Applicant, it is striking that other (arguably) more necessary detail pertinent to F4 continues to remain remarkably inaccurate and superficial. The Applicant has consistently sought to minimise its comments against selected aspects only, offering only vague commitment to remedy. Instead, the Applicant has astonishingly preferred to over-rely on the Planning Authority issuing unnecessary 'conditions' rather than submit necessary and precise detail up front in its application, and in so doing, now appears intent on creating a far more burdensome (and therefore costly) set of decisions than need be for the Authority to take.

BUT, Para. 57 of The Revised National Planning Policy Framework (February 2025) is clear that;

“Planning conditions should be kept to a **minimum** and only imposed where they are necessary, relevant to planning and to the development to be permitted, **enforceable, precise, and reasonable** in all other respects. **Agreeing conditions early** is beneficial **to all parties involved in the process** and can speed up decision making. Conditions that are required to be discharged before development commences should be avoided unless there is a clear justification.”

Accordingly, the Applicant appears not to have sufficiently achieved in its application:

[REDACTED]

1. **“Minimum”:** The Applicant is not intending to keep planning conditions to a minimum but use this mechanism to drive through an application which otherwise is still not sufficiently developed or thoroughly thought through.
2. **“Enforceable, precise, reasonable”:** (i) The Applicant has not committed to (and/or willingly shared) any enforcement plans. Instead, its application sets out to expose a Grade II listed residence to open-ended and un-mitigated risk, with the expectation that [REDACTED] should anticipate and expect to suffer through consequence of this Application and deal with issues after the fact, come what may. (ii) Generally insufficient thought/detail to the plan at F4 – see accompanying detailed Appendices. (iii) All of which makes the Applicant’s application, and proposed delivery plan wholly unreasonable at this time.
3. **“Agreeing, early, all parties”:** [REDACTED] has not agreed remedy to its outstanding objections, let alone it being ‘early’ agreement. The Applicant has squandered the last year in being offered yet another opportunity to doing so.

That said, at such time as all concerns (as identified in this note) be satisfactorily addressed, [REDACTED] will be pleased to withdraw its **OBJECTION** and tender its support for the granting of Planning and Listed Consent.

Proposed Course of Action:

The Applicant be required to: (a) voluntarily submit/agree to the adding of ‘conditions’ to its application on (i) an exceptional basis only. (ii) **ALL** conditions be discharged before development commences. (iii) Conditions be agreed/added only on the basis that they are sufficiently **PRECISE** to enable rigorous monitoring & enforcement before, during and after the construction period, including making use of measurable, data-driven methods. They must also clearly **STATE A COMMITMENT** to **IMMEDIATELY IMPOSE** financial and/or legal penalty in the case of non-compliance. (b) Should the Applicant on reflection now consider that one final attempt is needed to properly identify/submit further detail to the Planning Authority, and in the process re-calibrate its determination of which aspects of its application exceptionally require(s) the granting of ‘condition(s)’, then the Applicant be permitted to temporarily pause its application(s) once again in order to satisfactorily complete all necessary work.

Additionally, the Applicant be compelled to submit a **PRECISE** proposal for using proven alternative methods of construction, known to be both minimally invasive and substantially less risky to the setting and safety of sensitive heritage assets, including Green Cottage.

[REDACTED] has identified and captured the key items requiring further thought and/or precise detail in the attached table titled; [REDACTED]

REVISED TO PLANNING APPLICATION HBC APP/25/00162 & LISTED APPLICATION HBC APP/25/00176”.

