

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

Chichester Harbour Conservancy

www.conservancy.co.uk
16 February 2021

Dear Lewis Oliver,

Mill Rytte Holiday Village, 16 Havant Road, Gable Head, Hayling Island, Hampshire
APP/20/01127- Proposal Full Application pursuant to APP/16/01237 dated 5 May 2017, for the redevelopment of the holiday site including the demolition of redundant chalets, use of land for the siting of 112 holiday caravans with areas of open recreational space, cease the use of the land for pitch and putt purposes and retain the remaining pitch and putt area as a managed wildlife area including the provision of an ecology bund & ditch, landscaping, the siting of three bird hides with bat roost in their roof spaces and a mown 'circular wildlife walkway'

Please find below the consultation response from The Chichester Harbour Conservancy concerning the above planning submission. The Conservancy is a non-statutory consultee.

The landscape of Chichester Harbour was recognised as nationally important when it was designated as an Area of Outstanding Natural Beauty (AONB) in 1964, through the National Parks and Access to the Countryside Act of 1949. The Conservancy was established by the Chichester Harbour Conservancy Act of 1971. The purposes of the Conservancy are the responsibility for navigation and the conservation of nature. The Countryside and Rights of Way Act of 2000 formally established the Conservancy as the Joint Advisory Committee for the AONB, with the purpose to conserve and enhance the natural beauty of the landscape.

In its role in managing the Chichester Harbour Area of Outstanding Natural Beauty (AONB), The Conservancy has considered the submitted proposal against the Conservancy's planning guidance and principles - including The Chichester Harbour Management Plan (2019-2024), The Chichester Harbour Planning Principles (Management Plan version April 2019), The Chichester Harbour AONB Landscape Character Assessment (CBA update 2019), and The Chichester Harbour AONB Joint SPD (May 2017), adopted by both Chichester District Council and Havant Borough Council.

The Conservancy's Planning Committee considered this proposal at its meeting on **15 February 2021** held by internet due to current corona virus covid-19 restrictions on gatherings of individuals, and resolved that Havant Borough Council, as the Local Planning Authority (LPA), be advised that Chichester Harbour Conservancy makes the following comment in relation to the above application.

Chichester Harbour Conservancy Recommendation – OBJECTION

That the following planning issues impacting on the AONB are considered to justify an objection to the proposal.

Refusal Overview: The proposal for the increase in holiday units on previously used recreational land would physically increase the developed area of the park resulting in the loss of a significant amount of the amenity area within the site. This would change the character of the eastern part of the site within the countryside area, creating a clearly tourism form of development in appearance which is an unwelcomed intensification of the activities with this countryside location and likely to increase activity beyond the boundary within the AONB with associated wild life disturbance on the fringe of the adjacent and visually important AONB protected landscape (contrary to 'AONB Planning Principle PP01: Chichester Harbour as a Protected Area' of the adopted Chichester Harbour Management Plan - April 2019).



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- Lack of land use justification for the increase in holiday let units within close proximity to the AONB protected landscape resulting in the subsequent pressure on the existing countryside and water resources of the AONB protected area (contrary to 'AONB Planning Principle PP08: New Tourist Accommodation' of the adopted Chichester Harbour Management Plan - April 2019).
- Prominent impact to the AONB protected landscape through the spread of holiday let static caravans into the eastern part of the site and consequential loss of adjoining open grassland that acts as important open space and supporting countryside to the AONB protected landscape (counter to 'Part 17: Landscape' of the adopted Joint Chichester Harbour AONB Supplementary Planning Document - May 2017).
- Recreational wildlife disturbance within the AONB protected landscape resulting from the incursion of holiday letting units into the 'undeveloped' eastern area of the site.
- Waste water sewerage systems capacity is not shown to be acceptably proven to cater for the increase in holiday let units.
- Nitrogen nutrient increase requiring mitigation measures not provided to demonstrate the impact on the natural environment of the adjoining AONB protected landscape.
- The current open space to the east of the development area is designated as Site of Importance for Nature Conservation (SINC), the proposed development and spread of the holiday village holiday units layout is likely to adversely impact on this part of the site.
- The additional requirement to artificially illuminate the additional areas catering for the spread of holiday let static caravan units results in the spread of illumination into unlit countryside areas contrary to the Dark Skies protocol (counter to 'Part 30: Dark Skies' of the adopted Joint Chichester Harbour AONB Supplementary Planning Document - May 2017, and contrary to 'AONB Planning Principle PP09: Dark Skies' of the adopted Chichester Harbour Management Plan - April 2019).

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The submission has made only superficial consideration of the application proposal within its context and setting of the Area of Outstanding Natural Beauty (AONB). Passing reference to the AONB is made in the submitted documents to the proposal with no reference to AONB planning Principles or the potential impact of the proposal on the protected landscape and local wildlife.

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The site lies close to the AONB protected landscape and within the supporting wider environment. The development area of the red-line site (three areas) lies outside of a settlement policy area and therefore within the countryside.

The three red-line sites lie within the larger landholding which forms the planning unit. This planning unit includes both 'developed accommodation and service' areas for holiday accommodation and 'undeveloped recreational and general landscape amenity' areas for the holiday park.

The proposal would increase tourist accommodation development in the area. On this basis, the proposal should be considered against the AONB published policy requirements for such development – Planning Principle PP08: New Tourist Accommodation.

The principle of the proposal would have a clear visual impact on the character and appearance of the eastern red-line site and immediate surroundings. This area of the site is visible from the AONB protected landscape and the coastal footpath route.

Chichester Harbour Conservancy

Overall, the proposal is considered to be unduly prominent and therefore to be detrimental to the character or the appearance of the Area of Outstanding Natural Beauty (AONB) protected landscape setting environment.

The proposal can be seen to compromise the aspects of the Chichester Harbour AONB protected landscape designation planning approach to a UK National Landscape area.

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Should the proposal be considered acceptable to the LPA and a planning permission issued, the following suggested considerations for planning conditional controls as a minimum requirement to safeguard the AONB protected landscape should be included in any such permission -

- **HOLIDAY OCCUPATION ONLY** - The additional holiday lets shall be limited to occupation for holiday purposes only and not for any permanent place of residence or business (reflects condition 12 on permission APP/11/01080 dated 7 June 2013, and condition 3 on permission APP/16/01237 dated 5 May 2017).
- **DURATION OF CARAVAN SITING** - The additional siting and occupation and associated use of the static caravan holiday lets shall be limited to a duration of seventeen (17) years, expiring on 7 June 2038 at which time the units shall be removed and the land reinstated to its former grassland use (reflects condition 2 on permission APP/11/01080 dated 7 June 2013).
- **SEASONAL PERIOD LIMITATION** - The additional holiday lets shall be limited to occupation for no more than ten (10) months in any calendar year twelve (12) month period and not during the months of January and February (reflects condition 13 on permission APP/11/01080 dated 7 June 2013).
- **WASTEWATER SEWERAGE & CAPACITY** - The provision and use of the additional holiday lets should be subject to written confirmation from the water utility company that the increase in holiday units will be within the capacity and current capability of processing of the wastewater treatment works that serves this site and surrounding area.
- **DRAINAGE DETAILS** - Details of the foul and other waste-water drainage of the new development and how it links into the existing waste-water drainage system on the site shall be provided together with details of all and any pumping stations or holding tanks on the site to ensure that the development is able to utilise the existing foul sewerage system in place and not place an additional unsuitable pressure on both the on-site and off-site foul water infrastructure serving the site (reflects condition 14 on permission APP/16/01237 dated 5 May 2017).
- **NITROGEN NEUTRALITY** – Details of the nitrogen nutrient generated by the site as a whole and the additional development in particular shall be provided by independent specialists in this discipline and submitted in writing to the LPA together with a methodology for mitigation measures to be implemented should the result indicate this is necessary.
- **WILDLIFE & ECOLOGY** - The direct involvement of the Chichester Harbour AONB Unit Ecologist in the consideration and improvement of the wildlife on and adjoining the site is necessary, this is required as part of the detailed consideration of the 'managed wildlife area'



and the 'ecology bund with adjoining ditch' which require further detail submission, including how the 'ecology ditch' will remain wet; how it connects to nearby water sources; etc.

- STRUCTURAL LANDSCAPING & SCREENING - Submission of a structural landscape plan and implementation timescale for the provision of boundary planting to assist in screening the site from public vantage points, particularly from the AONB protected landscape and from the coastal footpath routes.
- EXTERNAL LIGHTING - Details of all areas of additional or altered artificial lighting to be installed as part of the permission shall be provided to the LPA for written agreement (reflects condition 6 on permission APP/11/01080 dated 7 June 2013, and condition 7 on permission APP/16/01237 dated 5 May 2017).
- UNIT HEIGHT - The height of all additional holiday letting units shall be single-storey only and comply with the definition of a caravan as laid down in legislation.

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A copy of the Chichester Harbour Conservancy AONB Unit Planning Assessment Report following the Planning Committee consideration is attached to this consultation response for your information and for open transparency public view.

Should you require any further clarification with regards to this recommendation please contact the CHC Planning Office.

Yours Sincerely,

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David Rothery
Principal Planning Officer
Chichester Harbour Conservancy AONB Unit

Visit our webpage – www.conservancy.co.uk/page/planning
Chichester Harbour Conservancy manage and advise on the
Chichester Harbour Area of Outstanding Natural Beauty
One of the UK's National Landscapes

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