

Planning Application Response of Planning Policy

Application No:	APP/20/01127
Address:	Mill Rythe Holiday Village
Development:	Redevelopment of existing chalets and use of the land for the siting of 112 holiday caravans
Case Officer:	Lewis Oliver
Comments by:	Jade Ellis
Date of Comments:	16 th February 2021

Policy Status

The [Local Plan \(Core Strategy\)](#) and the [Local Plan \(Allocations\)](#), together with the [Hampshire Minerals and Waste Plan](#), provide the development plan for the borough. The [Pre-submission Havant Borough Local Plan](#) (HBLP) was approved by the Council on 30 January 2019 and can be afforded limited weight.

The following policies are of relevance:

- CS5 – Tourism
- CS11 – Protecting and Enhancing the Special Environment and Heritage of Havant Borough
- CS16 – High Quality Design
- CS17 – Concentration and Distribution of Development within the Urban Areas
- CS20 – Transport and Access Strategy
- AL2 – Urban Area Boundaries and Undeveloped Gaps between Settlements
- DM4 – Static Holiday Caravan Development
- DM11 – Planning for More Sustainable Travel
- DM12 - Mitigating the Impacts of Travel
- DM14 – Car and Cycle Parking on Development (excluding residential)
- DM24 – Recreational Disturbance to Special Protected Areas (SPA) from Residential Development

In the Pre-submission Plan the following policies are of particular relevance:

- E1 | High Quality Design
- E3 | Landscape and settlement boundaries
- E14 | Local Ecological Network
- E16 | Recreation impact on the Solent European Sites
- EX1 | Water Quality impact on the Solent European Sites
- IN2 | Improving transport infrastructure
- IN3 | Transport and parking
- C2 | Tourism

The Havant Borough Local Plan was submitted for examination on 12 February 2021 and must be afforded limited weight.

It is understood that the application proposals seek planning permission for a revised scheme pursuant to the grant of planning permission under APP/16/01237.

Comments

The Core Strategy vision recognises that Hayling Island continues to be at the heart of the important tourism industry and recreational activity in the borough. Hayling Island is separated from the mainland by Chichester and Langstone Harbours and is surrounded by a variety of national and international designations which contribute to the attractiveness of its environment. This is reaffirmed by paragraph 7.22 of the supporting text in the emerging HBLP which recognises that Hayling Island and Emsworth continue to be at the heart of the tourism.

The site is located outside of the urban area boundary as defined by Policies CS17 and AL2. This is reaffirmed by emerging HBLP Policy E3.

Policy CS17 seeks to concentrate development within the urban areas of the borough, and prioritises development on previously developed land provided it is within the urban area. The policy states that development in the non-urban areas will only be permitted if it is consistent with the policies for the countryside set out in national policy. Though the site is within the non-urban area, the NPPF encourages the effective use of land by reusing land that has been previously developed provided that it is not of high environmental value.

Paragraph 28 of the NPPF also indicates that local plans should support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations.

ALP Policy CS5 states that appropriate development proposals that safeguard and improve existing tourist facilities, hotels, holiday centres and caravan parks will be supported. HBLP Policy C2 also generally promotes the tourism and visitor economy through the provision of new and/or improved attractions, accommodation or facilities that provide flexibility for changing market trends; and supports proposals which retain and enhance existing tourist accommodation. As the proposals retain the site for tourism purposes and would result in improved tourism accommodation/facilities, the proposals accord with ALP Policies CS5 and DM3 and emerging HBLP Policy C2.

As the proposals involve the use of land for the siting of holiday caravans, it is also of relevance to consider Policy DM4 together with HBLP Policy C2. The purpose of the former is to ensure that static holiday caravans do not become permanent residential accommodation owing to their location away from local services or owing to their form and setting. The policy therefore only supports caravan development where it is to be used for holiday purposes and has a limited period of occupancy for a maximum of ten months per calendar year. Emerging HBLP Policy C2 does not contain this criterion, but recognises that conditions may be appropriate to restrict occupation for holiday purposes only to ensure that it is not used as a person's sole or main place of residence (also see paragraph 7.25 of the supporting text).

Additionally, the site is located adjacent to Chichester Harbour, an area recognised for its wildlife interests and susceptibility to flood risk particularly during the winter months. Paragraph 10.16 of the Core Strategy supporting text indicates:

“where a limited occupancy condition or agreement is entered into, it is expected that the vacant months will be during the winter (between November and February) when protected birds and wildlife are most susceptible to noise and activity. The potential impacts on the landscape and nature conservation designations and the flood risk areas around the coastal zone will be particularly important in determining proposals related to this policy.”

Paragraph 7.26 of the HBLP supporting text indicates that where a development proposal would have potential to result in impacts to a European site, the Council would expect proposals to be in line with Policy E14 (Local Ecological Network) and where necessary to include an agreed code of practice which would ensure the avoidance of potential impacts.

The site is adjacent to the AONB, SPA, SAC, SSSI and SPA, and therefore any development should avoid any adverse impacts on these designations. The AONB also abuts the site to the north, east and west, and the design of any development should be sensitive to this designation. The Council's Ecologist and Landscape will be able to offer further advice on these matters.

The site is located within Flood Zone 3 and whilst there will be no overall change in vulnerability classification, the proposals will need to comply with national planning practice guidance. Hampshire County Council as the Lead Local Flood Authority and the Environment Agency will be able to offer further advice in this regard.

The proposal will need to comply with all aspects of ALP policies CS20, DM11 and DM12. Emerging Policies IN2 and IN3 of the HBLP are also of relevance. The Development Engineer and Hampshire County Council as Highways Authority should be consulted accordingly.

Recommendation

Though the site is located outside the urban area in the context of the ALP and emerging HBLP, the proposals would involve the redevelopment of a large brownfield site, and retain the site in tourism uses and deliver improved facilities.

Generally, the development proposals would make a positive contribution to the importance of tourism industry to the island, and generally support the Core Strategy and emerging Local Plan's vision in terms of contributing to the retention and enhancement of tourism provision on the island. On this basis, there is no objection in principle provided it can be demonstrated that the development proposals are acceptable in environmental terms.