
Site Address:	Poundcroft Stables adjacent 173, Havant Road, Hayling Island		
Proposal:	Change of use from grazing land to campsite with 28 fully serviced pitches, including construction of two new shower/toilet blocks, office building and ancillary structures.		
Application No:	APP/19/00744	Expiry Date:	02/11/2019
Applicant:	Mr & Mrs Murray		
Agent:	Mr Murray	Case Officer:	Tina Pickup
	I J Murray Associates		
Ward:	Hayling West		

Recommendation: **REFUSE PERMISSION**

1 Site Description

- 1.1 The application site relates to a parcel of land located between the Hayling Billy coastal path and the Havant Road, immediately north of 173, Havant Road, Hayling Island. The land amounts to 2.82 hectares and is currently used for the grazing of horses. There are some existing timber stables and other associated store buildings/caravans located at the southern end of the site, together with some hard standing areas. Mature trees form the southern boundary screening, and during the course of determining this application a draft Area TPO has been made. Otherwise boundaries are generally post and wire fencing/hedging having an open appearance. The exception is by the vehicular access where 2m high close boarded fencing and gates have been erected in a recess providing a vehicle standing area clear of the highway whilst gates are opened/closed.
- 1.2 Number 173 Havant Road is the last dwelling within the defined built up area, and the site therefore lies within the non-urban area and within the Coastal zone as defined by Policy DM9.
- 1.3 The site is undulating but set at a lower level than the Hayling Billy Trail, and has a ditch running through its middle - approximately east/west. This ditch links to the harbour and acts as a tidal Estuary with 20m buffer and is designated a statutory Main River on the Environment Agency map. A western strip of the site, where against the Hayling Billy Trail, the ditch and a northern drain are all designated a SINCR. The whole site lies within Flood zone 2 and 3. The adjacent harbour foreshore is designated Ramsar, SAC, SPA, SSSI. The site is also located close to the oyster beds in the harbour which are a Local Nature Reserve, and these beds are designated Important Sites for Brent Geese. Additionally the site and adjacent fields are designated as Uncertain Sites for Brent Geese. (These designations are now re-named as Core and Primary Support Areas; and Secondary Support Areas for Brent Geese by the Solent Waders and Brent Geese Strategy and emerging policy E17 of the HBLP 2036).

- 1.4 The planning history is relevant. During late 2015/early 2016 the southern section of the site was subject to some unauthorised engineering works with imported soils, aggregate, hard core etc. A Stop Notice was served in May 2016 and this was followed with an Enforcement Notice which required the permanent removal of the imported materials and the re-instatement of the Land to its original undeveloped condition. One of the main reasons for enforcement action being taken was the increased risk of flooding to neighbouring residential properties as a result of the works. The site was then sold again, to the current owner, who gained planning permission in March 2017 under ref APP/17/00052 to re-profile the imported topsoil i.e. have it re-distributed across the site, resulting in a slight increase in land levels, but without resulting in flood risk. The drainage ditch across the site had also been cleared maximising tidal capacity. Those works were undertaken and the Enforcement Notice has been Withdrawn.
- 1.5 Third party photographs of the site indicate that as a result of these works, this southern section of the site i.e. the area south of the ditch, does not now flood with surface water to the extent that the northern section does.

2 Relevant Planning History

99/57253/000 - Application for Certificate of Lawfulness relating to the use of land to the rear of Pound Croft for recreational horse uses and the stabling and exercising of horses, PERM,13/07/2000

APP/17/00052 - Re-profiling of land and associated hardstanding., PERM,29/03/2017

3 Proposal

- 3.1 Change of use from grazing land to campsite with 28 fully serviced pitches, including construction of two new shower/toilet blocks, office building and ancillary structures.
- 3.2 The proposed pitches would be sited on the southern section of the overall site only i.e. south of the ditch and where previously re-profiled. The northern part of the site would be taken out of grazing land for horses and designated as a Suitable Alternative Natural Greenspace (SANG) to assist with nutrient neutrality. The proposal would involve the formation of a circular hard surfaced drive round the site and 24 of the pitches are indicated as having a hardstanding area for caravans/mobile homes. The remaining 4 pitches, where the site narrows at its western side, are indicated as grassed tent pitches.
- 3.3 The proposal also includes the provision of new shower blocks and office buildings. These in part would replace existing stables and outbuildings on the site, but a central shower block and entrance office building would be new structures. The proposed buildings would measure:
- Office - 6m x 6m with height to eaves of 2.6m and height to ridge of 3.6m - with timber clad finish and felt roof
- Shower blocks - 18m x between 3.5m and 5m with height between 2.3m and 2.6m -with timber clad finish and felt roof
- 3.4 It is anticipated that the proposal would result in employment for two full time staff and five part time staff. A Flood Risk Assessment and Nitrogen Neutrality Statement have been submitted with the application. All year camping is proposed.

4 **Policy Considerations**

National Planning Policy Framework

Havant Borough Council Borough Design Guide SPD December 2011

Havant Borough Council Parking SPD July 2016

Havant Borough Local Plan (Core Strategy) March 2011

CS11	(Protecting and Enhancing the Special Environment and Heritage of Havant Borough)
CS15	(Flood and Coastal Erosion)
CS16	(High Quality Design)
CS17	(Concentration and Distribution of Development within the Urban Areas)
CS20	(Transport and Access Strategy)
CS21	(Developer Requirements)
CS5	(Tourism)
DM10	(Pollution)
DM12	(Mitigating the Impacts of Travel)
DM14	(Car and Cycle Parking on Development (excluding residential))
DM8	(Conservation, Protection and Enhancement of Existing Natural Features)
DM9	(Development in the Coastal Zone)

Havant Borough Local Plan (Allocations) July 2014

AL1	(Presumption in Favour of Sustainable Development)
DM24	(Recreational Disturbance to Special Protected Areas (SPAs) from Residential Development)
DM23	(Sites for Brent Geese and Waders)
AL2	(Urban Area Boundaries and Undeveloped Gaps between Settlements)

Havant Borough Pre Submission Local Plan 2036

IN4	(Access onto Classified Roads)
E22	(Amenity and pollution)
E4	(Development on the Coast)
E20	(Drainage infrastructure in new development)
E3	(Landscape and settlement boundaries)
E19	(Managing flood risk in new development)
E15	(Protected species)
E16	(Solent Special Protection Areas)
E17	(Solent Wader and Brent Goose feeding and roosting sites)
E14	(The Local Ecological Network)
C2*	()
IN3	(Transport and parking in new development)
E18	(Trees, hedgerows and woodland)
EX1	(EX1 Water Quality impact on the Solent European Sites)

Emsworth Neighbourhood Plan Post Examination Version 2020

N/a

Listed Building Grade: Not applicable.

Conservation Area: Not applicable.

5 Statutory and Non Statutory Consultations

Arboriculturalist

The current proposal does not appear to have taken into consideration the mature trees, mainly Oaks, along the boundaries and within the site and a provisional Tree Preservation Order has now been made to protect them. An Arboricultural Impact Assessment, Method Statement and Tree Protection Plan will need to be provided to ensure the important mature trees along the boundaries are adequately safeguarded and retained.

Chichester Harbour Conservancy

OBJECTION

1. Unnecessary / Unneeded development within the countryside

The Conservancy recommends refusal of this planning proposal as it represents unnecessary and unrequired tourism development within the open countryside within close proximity to the Area of Outstanding Natural Beauty (AONB).

2. Physical Appearance to the AONB / Prominent Impact to the AONB

The proposal would amount to a development which would be contrary to the provisions of Chichester Harbour AONB Planning Principles (version 1.1 July 2017) Planning Principle PP08 (New Tourist Accommodation); and the Chichester Harbour AONB Joint Supplementary Planning Document (16 May 2017) as adopted by the Council, paras.2.1 (Overarching Principle) and 33.1 to 33.3 (Character Area Map - Coastal Strip: Hayling Island North), in that the new tourist development is tantamount to increase recreational activity and the erosion of the rural character of the locality. The proposal therefore considered to be unduly prominent and to be detrimental to the character of the AONB.

3. Prominent Impact to the AONB and other designated sites

The proposal fails to conserve or enhance the natural environment of the countryside given that the application site adjoins the internationally important Ramsar site, Special Protection Area (SPA) and Special Area of Conservation (SAC), as well as the nationally important Site of Special Scientific Interest (SSSI) and is within the SSSI Impact Risk Zone, contrary to AONB Chichester Harbour Management Plan (2019-2024) Policy 2: Development Management

4. Wildlife mitigation contribution

The proposal fails to make or provide for any contribution towards the Solent Recreation Mitigation Partnership Strategy with regards to development and disturbance of wild birds in Chichester and Langstone harbours Special Protection Areas and would bring human activity into or close to protected wildlife designations to the detriment of wildlife.

Given the application sites setting, the proposal is considered to be unduly prominent and therefore to be detrimental to the character or the appearance of the nearby Area of Outstanding Natural Beauty (AONB). The proposal is likely therefore to have any significant impact or effect on the AONB in terms of character or in relation to wildlife conservation and protection.

Officer Note

It is considered that whilst the principle of the comments are noted and agreed, the AONB boundary is somewhat remote from the site and the impacts on the AONB very limited. The site is visually related to Langstone Harbour to the direct west, not Chichester Harbour AONB further to the east - as such harm to Chichester Harbour AONB has not been used in the recommended reason for refusal.

Coastal Engineering

Eastern Solent Coastal Partnership wish to place a **holding objection** on the application, on the grounds that insufficient information has been submitted to adequately demonstrate how flood risk at the site will be mitigated.

The site is shown to lie within the Environment Agency's Flood Zone 3 and is therefore considered to be at risk from experiencing a 1:200 year (0.5% annual probability) extreme tidal flood event. For information, the present day 1:200 year extreme tidal flood level for Langstone Harbour is 3.3 mAOD, increasing to a predicted 4.4 mAOD by the year 2115, due to the effects of climate change.

The Flood Risk Assessment (FRA) submitted by the applicant does not take into account the likely implications of climate change, in relation to the existing ground levels of the site and the predicted extreme tidal flood levels over the lifetime of the development.

Furthermore, the FRA fails to address the length of occupancy of the site, and therefore whether the development will be classed as "highly vulnerable" (caravans, mobile homes and park homes intended for permanent residential use) or "more vulnerable" (sites used for holiday or short-let caravans or camping, subject to a specific warning and evacuation plan), in accordance with Table 2 of the Flood Risk and Flood Zones tables of the PPG.

Whilst the applicant has also submitted a copy of the Flood Warning and Evacuation Procedure (FWEP), this does not address the fact that safe access and egress would not be possible during an extreme tidal flood event, due to access and egress along Havant Road being located within the present day Flood Zone 3. In addition, the FWEP does not consider the requirement for access by emergency services during an extreme tidal flood event.

County Ecologist

The application is not accompanied by any ecological information, and I have therefore carried out my own non-exhaustive desk-based assessment using the application documents, online sources and recent GIS mapping. The existing site comprises an improved grassland field situated immediately adjacent to Chichester & Langstone Harbours SPA and Ramsar, the Solent Maritime SAC and Langstone Harbour SSSI. Whilst not likely to be of significant ecological value in its own right (although the ditch to the north is saline and supports notable plant species), the field is included within the Solent Waders & Brent Goose Strategy (SWBGS) as Site H53A, a Secondary Support Area. This means that numbers of brent geese associated with the adjacent SPA/Ramsar have been shown to use the site and nearby fields.

The proposed development would increase significantly human activity adjacent to the designated sites and potentially result in the disturbance of protected bird species for which these sites are designated. The potential impacts of the proposal will need to be assessed appropriately. An area of SANG land is proposed to the north – again, this needs to be explained in further detail and measures for its management as SANG provided.

The saline drainage channels present within the site are designated locally as SINC's and therefore any potential impacts on these sensitive habitats (e.g. through waterborne pollution or trampling) need to be assessed.

I would recommend that the applicant commissions a Phase 1 ecological survey of the site: this should include an assessment of the potential for the site to support protected species (to be provided by a qualified ecologist (see Natural England guidance on finding a suitably-qualified ecologist) as well as an assessment of the potential impacts on the adjacent designated sites and their qualifying species. The Chartered Institute of Ecology and Environmental Management (CIEEM) (www.cieem.net) holds a database of suitably-qualified ecologists.

A Phase 1 ecological survey will determine whether there is any evidence of protected species or whether the site offers habitat suitable for supporting protected species, and whether the proposed works are likely to result in impacts to those habitats or species. Unless the consultant is able to conclude that there is no reasonable likelihood of protected species being present (due to negligible potential) or, that if present they are not to be impacted by the works, it is likely that further ecological survey work (Phase 2 survey) will be required prior to determination of the application. The results of any further surveys should be used to provide an assessment of the likely ecological impacts of the proposed works and to inform any mitigation measures.

NPPF, Circular 06/2005 and Natural England Standing Advice on Protected Species, require that planning decisions are based on full, up-to-date ecological information and it is essential that all necessary survey, assessment and mitigation information is available to the LPA prior to determination, particularly in the case of protected species, which are a material planning consideration. This will enable the LPA to determine the application on the basis of full knowledge about the ecological impacts of the proposal and to ensure that any impacts can and will be mitigated, and are acceptable.

County Minerals

None received

Southern Water

Southern Water would not support the proposals for cess pit in the presence of public foul sewerage network in the close vicinity of the development site. The foul sewerage shall be disposed in accordance with Part H1 of Building Regulations hierarchy.

It may be possible for the foul flows from the proposed development to be connected to a nearby public sewer, and the applicant shall investigate this option. Southern Water requires a formal application for a connection to the public sewer to be made by the applicant or developer.

A formal application for connection to the public sewerage system is required in order to service this development.

Environment Agency shall be consulted directly regarding the use of a cess pit.

The Council's technical staff and the relevant authority for land drainage consent should comment on the adequacy of the proposals to discharge surface water to the local watercourse.

Land uses such as general hardstanding that may be subject to oil/petrol spillages should be drained by means of oil trap gullies or petrol/oil interceptors.

We request that should this application receive planning approval, the following condition is attached to the consent:

"Construction of the development shall not commence until details of the proposed means of foul and surface water sewerage disposal have been submitted to, and approved in writing by, the Local Planning Authority in consultation with Southern

Water.”

It is possible that a sewer now deemed to be public could be crossing the development site. Therefore, should any sewer be found during construction works, an investigation of the sewer will be required to ascertain its ownership before any further works commence on site.

Economic Development

None received

Engineering/Drainage

None received

Environment Agency

We object to the proposed development on two points, we recommend that planning permission is refused for the following reasons:

1) In the absence of an acceptable flood risk assessment (FRA) we object to this application and recommend that planning permission is refused.

Reason

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the planning practice guidance. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to:

- ☐ take the impacts of climate change into account. There is no assessment of the impact of climate change using appropriate climate change allowances.
- ☐ consider the requirement for flood emergency planning including flood warning and evacuation of people for a range of flooding events up to and including the extreme event
- ☐ consider how people will be kept safe from the identified flood hazards
- ☐ make it clear from whether this development will be classed as either Highly Vulnerable (*Caravans, mobile homes and park homes intended for permanent residential use*) or More Vulnerable (*Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan*) in accordance with table 2 of the Flood Zones and flood risk tables of the PPG. It will be necessary to state the length of annual occupancy to determine whether the application is classified as Highly or More Vulnerable.

The submitted FRA does not therefore, provide a suitable basis for assessment to be made of the flood risks arising from the proposed development.

2) We also object to the proposed development as submitted because it involves the use of a non-mains foul drainage system in circumstances where it may be reasonable for the development to be connected to a public sewer and no justification has been provided for the use of a non-mains system. We recommend that the application should be refused on this basis.

Reasons

This objection is supported by planning practice guidance on non-mains drainage which advises that the first presumption must be to provide a system of foul drainage discharging into a public sewer (ref ID 34-020-20140306). Only where, having taken into account the cost and/or practicability, it can be shown to the satisfaction of the local planning authority that connection to a public sewer is not feasible, should non-mains foul sewage disposal solutions be considered. This

objection is supported by the National Planning Policy Framework paragraph 170 and the planning practice guidance (PPG) (ref ID 34-020-20140306).

Advice to LPA

Sequential and Exception tests

In accordance with the National Planning Policy Framework (paragraph 158), development should not be permitted if there are reasonably available sites appropriate

for the proposed development in areas with a lower probability of flooding. The Sequential and Exception Tests do not need to be applied to minor developments and changes of use, **except** for a change of use to a caravan, camping or chalet site, or to a mobile home or park home site.

It is for the local planning authority to determine if the sequential test has to be applied and whether or not there are other sites available at lower flood risk. Our flood risk standing advice reminds you of this and provides advice on how to apply the test. The National Planning Policy Framework (paragraph 161) makes it clear that both elements of the exception test must be passed for development to be permitted. Part 2 of the test requires the applicant to demonstrate, via a site-specific flood risk assessment, that the development will be safe, without increasing flood risk elsewhere. Where possible, the development should reduce flood risk overall.

Access and Egress

The following issues are not within our direct remit or expertise, but nevertheless are important considerations for managing flood risk for this development. Prior to deciding this application we recommend that consideration is given to the issues below. Where necessary, the advice of relevant experts should be sought.

- ☐ Adequacy of rescue or evacuation arrangements
- ☐ Details and adequacy of an emergency plan
- ☐ Provision of and adequacy of a temporary refuge
- ☐ Details and adequacy of flood proofing and other building level resistance and resilience measures
- ☐ Details and calculations relating to the structural stability of buildings during a flood
- ☐ Whether insurance can be gained or not
- ☐ Provision of an adequate means of surface water disposal such that flood risk on and off-site isn't increased

Environmental Permitting Regulations

Planning permission does not remove the requirement for an Environmental Permit. The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- ☐ on or within 8 metres of a main river (16 metres if tidal)
- ☐ on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- ☐ on or within 16 metres of a sea defence
- ☐ involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- ☐ in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

Environmental Health

Environmental Protection team:

no comments or objections to raise in principal in respect of this application. Conditions relating to the installation of all external lighting on the site and restrictions on times for the servicing of the site (ie deliveries for the site shop and collections from the site such as waste collections etc.) and control of use externally of amplified equipment are relevant to the application and EP would request the following conditions are attached to any permission you are minded to grant:

LIGHTING; TIMES/ DAYS FOR DELIVERY/DESPATCH LIMITATION; USE OF AMPLYFYING EQUIPMENT EXTERNALLY

Informative:

I would be grateful if the applicants could be reminded of the need for the site to meet the requirements of the site licensing conditions applicable to the site, should permission be granted.

Forestry Commission

None received

Hampshire Highways

The application makes general reference to traffic generation for both the existing and proposed uses. it would be helpful if more accurate detail could be provided. For the latter an interrogation of TRICS is required. The Highway Authority are particularly, but not exclusively interested in the likely traffic generation during peak travel times.

The access in its present form is not acceptable to serve the size and type of vehicle likely to be generated and will need to be improved in its geometry, tracking of vehicles turning left in and left out will be required. Visibility splays of 2.4m. x 43m. will be required, which whilst available to the south, the northern splay is likely to significantly affect the existing frontage hedge. The existing flow of traffic on Havant Road is high and therefore vehicles are likely to be unable to turn into the site immediately. A queue will build up behind them and it will be necessary to ensure an adequate stopping sight distance is maintained around the bend to the north of the site. These requirements could result in the loss of part of the frontage hedge.

At this time the Highway Authority can only request the additional information referred to above and in the absence of that information recommend an objection on the ground:

Inadequate information has been submitted to enable the Local Planning Authority to fully establish the highway implications of the proposed development

Hampshire Wildlife Trust

None received

Landscape Team

- Due to the change in the site usage and visual prominence from adjacent highway and PROW We would recommend that a landscape visual impact assessment (LVIA) is undertaken. The LVIA will highlight if there is any negative impacts on the landscape character of the area as a result of the development. Furthermore the conclusion and recommendations of the LVIA should feed directly into the soft landscape scheme to help mitigate any negative consequences.

- The submitted drawings do not provide sufficient details on the extents and details of the SANGS, that is north of the proposed camping area.

- The watercourse and drainage channels that run through the site are designated SINCS and as such we would want to see an appropriate landscape buffer to mitigate any possible negative impact on the local wildlife. Additionally the management of the SINCS will need to be factored into the sites management programme.

- A soft landscape scheme which includes significant boundary planting is recommended. This should include UK native hedgerow with large native legacy tree species punctuated throughout.
- The site plan does not show details for the whole of the site boundary. In particular we need to see details for the proposed site access from the A3023.

We require the following drawings to be submitted for comment:

- A soft landscape scheme requiring submission of fully annotated plans at sufficient scale to identify species of individually planted trees, shrubs, hedges, marginal, bulbs and any areas of turfing / seeding. Planting areas should show the locations of different single species groups in relation to one another, and the locations of any individual specimen shrubs. Other information shall include plant specification schedules, comprising plant size, number, density and landscape management plan.
- Hard landscape details requiring submission of fully annotated plans at sufficient scale that comprise the proposed range of coloured and textured surfacing treatments, which identify:
 - hard surfacing material type / product reference and colour
 - laying bond
 - edging or kerb detail / type
- Boundary details requiring submission of fully annotated plans at sufficient scale showing the locations of existing, retained and proposed new boundary treatments, with scaled elevation drawings to show height, design, materials, type and colour of proposed new.
- Further details on building material specification for the development requiring submission including material type, product reference and colour to understand how the proposed development will affect the existing landscape character.

Langstone Harbour Board

The Board's Planning Sub Committee has considered this application and has decided to **OBJECT** to the proposals for the following reasons:

1. The Langstone Harbour Management Plan states that "The open area around the harbour is part of the harbour's landscape and nature conservation value and should be retained and managed for these purposes in association with the harbour itself".
2. The proposal includes access directly on to the Billy Trail very close to the Oysterbeds – overnight residents in this vicinity are likely to increase disturbance pressures on the breeding/roosting birds present at this site.
3. The field is categorised as "uncertain" for wading birds in the Solent Wader and Brent Goose Strategy – further survey work should be undertaken to understand the importance of the field as a high tide feeding site for SPA bird species.
4. The applicant has provided no information about how potential pressures on features of the adjoining SSSI, SPA, SAC, Ramsar site arising from this development might be mitigated.

Natural England Government Team

Further Information Required

The application site is within 20m of the Chichester and Langstone Harbours Special Protection Area (SPA) and Ramsar and the Solent Maritime Special Area of Conservation (SAC). The site is also identified within the Solent Waders and Brent Goose network as a Secondary Support Area,

Further information is required to determine the impact of the proposal on the SAC, SPA and supporting habitat, specifically in relation to the increase in recreational disturbance, loss of SPA supporting habitat and impact of the nutrients from the development.

Solent Recreation Mitigation

This application is in close proximity to the Chichester and Langstone Harbours SPA and will lead to a net increase in residential accommodation. Consideration therefore needs to be given to alone and in-combination effects arising from an increase in recreational pressure from the development. Natural England is aware that Havant Borough Council has adopted planning policy to mitigate against adverse effects from recreational disturbance on the Solent SPA sites, as agreed by the Solent Recreation Mitigation Partnership (SRMP).

The applicant has proposed an area of land to be designated SANG in order to provide mitigation for the impact of recreational disturbance on the designated sites and associated species. The purpose of a SANG is to provide an alternative recreational resource to the designated sites. The efficacy of the SANG depends on a number of factors including its location, size, ecological sensitivity and management.

It is Natural England's view that the SANG proposal raises a number of issues for further consideration due to its proximity to the sensitive international sites and the existing sensitivity of the site as it is part of the Solent Waders and Brent Goose (SWBG) network of support sites (H53A). Use of the area as a SANG may be incompatible with the purpose of the SWBG network to protect and enhance sites of importance to supporting the functionality of the designated sites.

Natural England would require further information on the objectives of the proposed SANG, supported by a costed management and monitoring plan in perpetuity. Details of the organisation to deliver the agreed management should be provided. Depending on the management organisation, the proposal may need to include 'step-in' rights for Havant Borough Council to take over management of the SANG if necessary. We also advise that the management plan includes the impacts and proposed mitigation of use of the SWBG support site to fully assess the impact of this part of the application on the integrity of the European sites.

It is Natural England's preference that full contributions are paid to SRMP in line with the Definitive Strategy to cover the wider in-combination impacts. The Solent Recreation Mitigation Strategy provides further guidance on calculating a mitigation contribution figure for proposals of this type.

It may then be possible to provide on-site measures to address site-specific issues associated with the proposal. For example, this could include the provision of a dog friendly holiday park, with a dog exercise area within the park, appropriate interpretation and signage.

Loss of SPA supporting habitat

The proposals have the potential to affect SPA functional land, which forms part of a network of terrestrial sites located outside of the Solent SPAs boundaries used by SPA species (including qualifying features and assemblage species) as alternative areas for roosting and foraging. These sites support the functionality of the designated sites and are therefore protected in this context.

The site affected (H34A) is classed as a Secondary Support Site and supports significant numbers of feeding Oystercatchers and includes the proposed holiday park area and SANG. As such mitigation for the loss of the function of this area should be proposed in line with the SWBG Mitigation Guidance;

<https://solentwbgs.files.wordpress.com/2018/11/swbgs-mitigation-guidance-oct-2018.pdf>

Natural England would strongly recommend that the applicant consider the potential to reconfigure the proposal and avoid the need to mitigate for the loss of the entire support site through addressing the mitigation for recreational impacts through SRMP contributions and the on-site design of the holiday park.

There is the potential that a suite of enhancements and appropriate management of the northern fields could provide suitable mitigation for the loss of the southern field as a SWBG support site. Consideration would need to be given to the long term management of the northern fields and further information is included in the above guidance.

Nutrient Neutrality

With regard to the integrity of the designated sites, we advise that there is currently uncertainty as to whether the increase in waste water from new housing in the Solent catchment will have an adverse effect on the international sites.

The applicant has provided a nutrient neutrality statement, however Natural England has a number of clarifications which should be addressed

Biodiversity Mitigation and Enhancement

In order for your authority to be assured that the proposal meets the requirements of Natural England's standing advice and the additional requirements for biodiversity enhancement and net gain as set out in National Planning Policy Framework paragraphs 8, 118, 170, 174 and 175d, Natural England recommends that the application is supported by a Biodiversity Mitigation and Enhancement Plan (BMEP), or equivalent, that has been agreed by a Hampshire County Council (HCC) Ecologist. In some instances, further surveys may be necessary through an ecological appraisal to be agreed by an HCC ecologist.

The submission of an HCC approved BMEP will help ensure your authority meets the requirements of Section 40 of the Natural Environment and Rural Communities Act (2006), which states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'. Section 40(3) also states that 'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'. Biodiversity 2020: A strategy for England's wildlife and ecosystem services and Making Space for Nature (2010) also provide strong drivers for the inclusion of biodiversity enhancements through the planning process.

Planning Policy

Summary:

As set out above, the site lies outside, but adjacent to the urban area as defined by the adopted and emerging local plan. As such development is generally restricted unless it can be shown to be consistent with the policies for 'rural areas' in the NPPF. In this case, the development has the potential to support sustainable rural tourism under paragraph 83 of the NPPF, though the preference in policy terms would be for the development to be in the urban area. It is also noted that the site falls within the Coastal Zone as currently defined by DM9 in the Core Strategy.

The key consideration for whether the principle of development is acceptable in this location is therefore the impact on the character of the countryside. The Council's Landscape Team will be able to offer further advice on this matter.

In addition to the above, it needs to be shown that the sequential and exception tests can be passed. The partial loss of the Secondary Support Area for Solent Waders and Brent Geese will also need to be satisfactorily addressed.

Royal Society for the Protection of Birds

None received

Tourism South East

None received

Traffic Management

Traffic team has no adverse comment to make on this application

6 Community Involvement

This application was publicised in accordance with the Council's Code of Practice for Publicity of Planning Applications approved at minute 207/6/92 (as amended), as a result of which the following publicity was undertaken:

Number of neighbour notification letters sent: 17

Number of site notices: 2

Statutory advertisement: 23/08/2019

Number of representations received: 51

Comment	Officer Comment
51 letters of representation have been received, 50 of which object and raise the following issues, summarised issues:	
Flooding - site in Flood Zone 3; field a flood plain & ditch needs to flow to sea; anything static will result in displaced flooding and affect nearby houses & road; field likely to flood in near future; evacuation plan not sufficient to eliminate risk to life; floods in 2001 and adjacent houses lost everything - needs to remain as flood plain; EA declared area a 'let go' area & subject to 1m sea water rises in 60 years, without storm surges; will destroy sea defences; sequential & exception tests should be undertaken; assessment of safe access/egress should be undertaken; river is tidal so floods twice a day and takes long time waiting for tide to go out; site takes all rain water from fields and acts as a holding area;	Noted - see section 7 re Flood Risk
Drainage - Extra hard surfacing affects ability to absorb surface water meaning flood elsewhere; full SuDs expected; site gets waterlogged	Noted
Foul sewers on Island already unable to cope & sewage expelled into Langstone Harbour during heavy rain - will make worse; proposed cess pit close to bund and any breakdown could contaminate harbour; no mention	Noted - SW & EA object to cess pit

of "grey" water disposal

Wildlife - destroying habitat; provides variety of flora & fauna; loss of bird habitat; disturb wildlife links to RAMSAR & destroy winter foraging area for birds; herons nest in the ditch & would be affected; damage to nature reserve; part of site a SINC and this not addressed; site hosts newts & toads

Noted - see section 7

Traffic - generate increase in traffic & impact safety at all times of day; caravans turning into site dangerous & will disrupt flow on this heavily used main road A3023 that is only route onto Island; will cause blockages, grid lock, and traffic queues, esp in peak summer traffic; entrance on slight bend next to bus stop; West Lane right turn causes delays and this will do the same; campers will need to access facilities such as shops adding to vehicle movements and turns into site; risk for pedestrians and cyclists; risk of emergency vehicles not being able to pass blocked A3023; no Transport Assessment; need to demonstrate sufficient visibility & motor homes & fire tenders can safely enter & exit site; black spot for accidents;

Noted - see section 7 and highways considerations

should not consider proposal until Hayling's Transport Assessment review is completed

Now complete & agreed proposal should consider

Visually intrusive eyesore; adverse effect on character of landscape; view from Billy trail will be caravans, cars, tents & rubbish rather than birds and horses.

Noted - see section 7

Noise and nuisance from campers; tranquillity of Billy Trail affected; noise levels should be restricted; increased noise, smells & fumes, up to 100 people & dogs from 28 pitches, detrimental to nearby residents all day and evening

Noted - see section 7

Opening hours should be restricted

28 pitches excessive

State can apply for Camping & Caravan Club HTC certificate to hold events with unlimited numbers - will cause significant disturbance to local residents	Noted - potentially permitted development so no control
Already businesses on Island offering these facilities/not needed/lack of demand; doubt would support local economy as caravanners would be self-catering	Competition between businesses not a valid planning consideration
No entertainment on Island for campers; location not close enough to facilities; isolated location resulting in campers leaving and exiting site	Noted
infrastructure on island can't cope with extra demands; will overload schools, surgeries, water & sewage systems	Tourists would not use schools or surgeries etc
<u>Loss of green space</u> & one of last fields; part of natural break; loss of stables which provide amenity; associated loss of good health	Noted
<u>Pollution</u> to Hayling Billy & Langstone Harbour; additional air pollution from standing traffic and camp fires/BBQ's	Noted
Not nitrogen neutral	Noted - see section 7
<u>Previous illegal fill</u> should be removed & not used as justification; previous decision requires infill should be removed, why not enforced?; should be returned to flood plain level;	Enforcement Notice was Withdrawn following implementation of APP/17/00052
Proposal benefits applicant financially but does not benefit local community; fear once business is operational for a couple of seasons planning permission for houses will be sought	Noted - each application considered on its merits
Omission of dual circuit 33KV overhead lines across site from plans; previous accidents on Hayling when person & tent pole made contact with over head line - very dangerous	Noted
Dispute been 14 horses on site - only 6 with less vehicular movements than stated;	Noted

No details of visitor parking and since no double yellows in area will cause on street parking irritating local residents; lack of relevant reports addressing issues & constraints; site not within current development plan policy area; loss of private views from nearby residents; hedgerows could be deemed "important hedgerows"	Space on site for visitor parking Agreed Agreed Noted Noted
<u>Included within the 50 letters is the following from the Ramblers Association:</u> Object - the development encroaches onto an area that is open in character, close to the coast and the Hayling Billy Trail from which there are views into the site. This changes the character of the area from a rural to a more formal landscape. As such this contravenes the policies set out in the Havant Borough Local Plan (Core Strategy); Policy CS11 - the proposed development does not meet the criteria set out for planning permission to be granted. In particular CS11.1 which refers to the Townscape, Landscape and Seascape Assessment. The site forms part of the network of 'Green Infrastructure', but does not meet the requirements of development in such areas as set out in Policy CS13. The importance of Green Infrastructure is confirmed in the recently adopted draft by PUSH of the South Hampshire Green Infrastructure Implementation Plan (June 2019). In addition, the proposed development does not address the criteria that has to be met for planning permission to be granted set out under DM9 Development in the Coastal zone.	Noted - see section 7

And 1 letter of support has been received: would help compensate for loss of revenue from overnight parking ban on the beach; welcome proper pitches to enjoy Hayling Island; local shops & tourism trade would benefit; contractors benefit in winter; asset to island	Noted
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7 **Planning Considerations**

7.1 Having regard to the relevant policies of the development plan it is considered that the main issues arising from this application are:

- (i) Principle of development
- (ii) Impact upon the character of the countryside
- (iii) Impact upon nature conservation and ecology
- (iv) Flood Risk and Drainage
- (v) Highways and Parking
- (vi) Impact on neighbouring amenity
- (vii) Impact on Trees
- (viii) Compliance with Habitats Regulations
- (ix) Tourism and business

(i) Principle of development

7.2 The application site is situated outside the urban area where any development needs to be compliant with the policies for 'rural areas' as set out in the NPPF. Whilst rural tourism is potentially a suitable sustainable rural use, nevertheless this would still need to accord with policies protecting the character of the countryside. The site is located adjacent Langstone Harbour with all its statutory landscape and ecological constraints and designations, as well as being within a flood zone. The principle of development is therefore, in this case, dependent on the detailed consideration as to whether the proposed use and associated operational development would be harmful to the character of the countryside.

(ii) Impact upon the character of the countryside

7.3 The site is currently used for the grazing of horses with some associated discreet stables and buildings, largely screened against the wooded southern boundary. The site therefore has an open and rural character, and provides a setting to the coast and Hayling Billy trail - the long distance views of the site are of appropriate countryside. The proposal would involve permanent hard surfacing and some replacement buildings, as well as the siting of touring caravans, mobile homes and tents within the southern section of the site. This would largely occur in the summer months, but it is noted that 12 months camping is applied for so could include some caravans and mobile homes present in the winter months too.

- 7.4 It is considered that the additional hard surfacing and buildings would lead to a further urbanisation of the southern half of the site, and proposed shower block B would be located more centrally within the area, away from the southern boundary and therefore lacking in the benefit of the natural backdrop of the treed southern boundary. This particular shower block would represent an encroachment into the more open part of the site and would be likely to be more visually prominent and intrusive.
- 7.5 In addition, when in use the introduction of mobile homes, caravans, cars and tents and all their associated paraphernalia (e.g. awnings, tables & chairs, washing lines, lights, flags etc) would all add a colourful and cluttered appearance to the site. The vibrancy and scale of structures dispersed across the southern section of the site, would inevitably be visible from the higher level Hayling Billy Trail and change the character and appearance of the site. Whilst this would be adjacent to and seen against the backdrop of the urban area, nevertheless it would represent an encroachment into the non urban area and coastal zone, visually altering the appearance of the site and area.
- 7.6 The submitted plans do indicate the provision of some screening hedging and planting, along the ditch boundary and between pitches, but this is diagrammatic only and not worked up into a landscaping proposal. In the absence of a Visual Impact Assessment and detailed landscaping scheme it is difficult to assess the effectiveness of any mitigation screening. The raised level of the Hayling Billy Trail relative to the site is such that eye level increases the long distance views down into the site and any landscape mitigation would need to be quite high to successfully screen the campsite paraphernalia. This is the sort of detail that would need to be included within any Visual Impact Assessment and without, it is not satisfactorily demonstrated that the proposed campsite would not materially harm the rural character and coastal setting of the site. The proposal is therefore considered contrary to adopted policies CS11, CS16, CS17, DM9 of the Core Strategy; and policy AL2 of the Allocations Plan, as well as emerging policies E3 and E4 of the Pre-Submission HBLP 2036.

(iii) Impact upon nature conservation and ecology

- 7.7 The site immediately abuts Langstone Harbour which is a designated SSSI, Ramsar, SAC and SPA and adjacent a Local Nature Reserve where development should protect and enhance these valued landscapes, habitats and biodiversity. Policy CS11 protects these areas. Furthermore parts of the site are designated a SINC and form a Secondary Support Area for Solent Waders and Brent Geese. These designations all support and protect the international importance of the harbour for over-wintering birds.
- 7.8 It is considered that the proposed campsite would introduce increased human activity with associated noise, disturbance, light etc, potentially disturbing the protected bird species. A 28 pitch campsite, when operating at capacity, could lead to over 100 people being present at the site with little control over access to the foreshore at all times of day and night. No ecological information has been submitted to address the potential impacts on the site itself or adjacent area. In the absence of a Phase 1 Ecological Survey and possible Phase 2 Survey, then it is not possible to accurately assess whether the proposal would have any adverse ecological impacts. See also section about Habitats Regulations and the Solent Recreational Mitigation Strategy below.

- 7.9 Whilst the northern part of the site is proposed as a Suitable Alternative Natural Greenspace (SANG) to compensate and mitigate for the impacts of the proposal, there is however little detail provided about the SANG. Natural England have raised concerns about the compatibility of a SANG with the sites existing role as a support area for the Solent Waders and Brent Goose network. More detail would be needed on the extent of and long term management of the proposed SANG before it can be considered an appropriate feature or not. Natural England also point out the need for biodiversity enhancement and net gain as set out in the NPPF and recommend the submission of a Biodiversity Mitigation and Enhancement Plan (BEMP).
- 7.10 Overall the proposal does not adequately address the nature conservation and ecological constraints of the site and is considered contrary to policies CS11 and DM8 of the Core Strategy; policies DM23 and DM24 of the Allocations Plan; and emerging policies E14, E15 and E16 of the Pre-Submission HBLP 2036.

(iv) Flood Risk and Drainage

- 7.11 The site falls within Flood Zone 3 and sites used for holiday or short-let caravans and camping are considered "More Vulnerable". However it is noted that the application proposes 12 month use of the site, enabling tourist use in the winter months when more prone to flooding, and hence it could be argued that in fact the proposal is akin to permanent mobile home residential use which is classified as "Highly Vulnerable". For such developments in Flood Zone 3 both a Sequential Test (which aims to steer development to those areas with the lowest probability of flooding), and an Exception Test (which needs to demonstrate that the development would provide wider sustainability benefits to the community that outweigh any flood risk; and the development is safe for its lifetime) needs to be undertaken as part of the Flood Risk Assessment. The submitted FRA does not include these reports for the LPA to assess. In addition, the Environment Agency objects to the proposal because the FRA does not take account of climate change.
- 7.12 Third party comments also object to the use of the flood plain for further development, noting that the increased hard surfacing would make drainage and flooding worse elsewhere and displace the water levels. It is understood that the water on site is largely from tidal deluge and the clearance of the drainage ditch on site has helped with the flow back to the sea. As a Main River the EA carries out maintenance to rivers to manage flood risk. It is noted that as a result of compliance with APP/1700052 the land levels of the southern section of the site have risen slightly and although this means this part of the site is not currently subjected to such severe tidal deluge, nevertheless the whole site remains in flood zone 2 and 3 and any development proposals on the site still need to provide an adequate FRA that complies with current guidance on FRA. Additionally, the access and egress including emergency evacuation needs to be considered.
- 7.13 The submitted Services plan indicates that each pitch would be served by both water and electricity as well as a foul/soil pipe and the planning form indicates that this would go to a cess pit. Both Southern Water and the Environment Agency object to the use of a cess pit when it would be possible to connect to the public foul sewage system network, available in the Havant Road. Overall, in the absence of an adequate FRA and Sequential and Exception tests, and appropriate drainage solution for the site, the proposal is considered contrary to policy CS15 of the Core Strategy, and emerging policies E19 and E20 of the Pre-Submission HBLP 2036.

(v) Highways and parking

- 7.14 The proposal would involve the re-use of an existing access onto the Classified A3023 and the submitted Design and Access Statement makes limited reference to traffic, indicating that the trips generated would simply replace the existing use serving 14 horses. Third party comments dispute the number of horses kept at the site and frequency of existing trips to the site. It is noted that the site lies on a slight bend and movements into the site may result in queuing traffic on the single, main road onto Hayling. County Highways require more detailed analysis of traffic generation and an interrogation of TRICS. They also note that the geometry of the access would need to be improved to accommodate likely vehicles, with tracking to demonstrate acceptability. Visibility splays are not shown on the submitted drawings and may result in the loss of the established hedging and boundary treatment on the Havant Road frontage, which could further effect the visual appearance and character of the site. Emerging policy IN4 is particularly relevant as this policy considers accesses onto classified roads and notes that any intensification of use of an existing access onto the A3023 will not be permitted unless it serves an allocated site or is part of a transport mitigation scheme.
- 7.15 The Council's recent Hayling Island Transport Assessment and Addendum (January 2020) assessed through modelling the impact of anticipated development on the island to 2036 and has a particular focus on flows on the A3023. The A3023 is the only route on and off the island and is known to be particularly vulnerable to friction caused by driver behaviour and vehicle turning movements. While the HITA has identified a number of interventions to reduce this sensitivity, there remains an expectation that applicants will undertake the necessary site-specific technical analysis, preferably using the modelling base developed for the HITA, to establish the impact of their particular proposal, and where necessary mitigate it. It is acknowledged that this TA Addendum was published during the course of determining this planning application, but nevertheless such information would be required to demonstrate acceptability before this application could be supported.
- 7.16 In terms of on site parking, each pitch would have sufficient space for the caravan or motor home plus one vehicle. The site plan indicates hardstanding at the entrance of the site that could also provide visitor parking. The adopted Parking SPD does not cover campsites, but other tourist accommodation e.g. hotels/guest houses requires 1 space per bedroom. It is considered that the proposed layout with one space per pitch, would represent a logical and adequate amount of on site parking for the use.
- 7.17 Overall it is considered that the submitted Highways information is insufficient to address the potential highway implications of the proposal and does not adequately demonstrate that no harm to the safety and amenity of other users of the highway would occur. The proposal is therefore considered contrary to adopted policies CS20 and DM12 of the Core Strategy, and emerging policies IN3 and IN4 of the HBLP 2036.

(vi) Impact on neighbouring amenity

- 7.18 The site is located close to some residential dwellings - it is sited immediately adjacent 173 Havant Road which is the northern most dwelling in Stoke and the properties in Mill Close are opposite, as well as number 175 to the north having a close relationship and outlook over the site. In peak use the proposed campsite with 28 pitches could cater for over 100 people and it is considered that the noise and disturbance associated with the use could be intrusive. Each pitch could have children playing,

dogs barking, radios/music, bbq's and lights with no control over duration and hours, and the cumulative effect could be harmful to the otherwise peace and quiet of neighbouring residential amenity. It is considered that any hours or lighting conditions would be difficult to perpetually enforce and as such the scale of the proposal is likely to result in harm to neighbouring amenity from increased noise and disturbance, contrary to policy CS16 of the adopted Core Strategy and emerging policy E22 of the HBLP 2036.

(vii) Impact on trees

- 7.19 There are some significant mature trees, including oaks, along the southern and south-western boundary of the site that provide valuable screening and setting to the site. A draft Area TPO has been made on these trees - TPO number 13539. The existing stable buildings are sited under the canopies of these trees and between trunks, but generally do not have concrete basis or foundations. They have been present long enough for the trees to have survived and thrived round these minimal structures. However the proposed replacement of the stables with larger shower blocks has not had sufficient regard to the precise siting of the trees which would be likely to be harmed. The shower blocks would need underground servicing and pipes and this could also harm the roots of the trees.
- 7.20 Therefore without a more detailed Arboricultural Impact Assessment, Method Statement and Tree Protection Plan it has not been adequately demonstrated that the trees on the site would be safeguarded and retained, contrary to policies CS11 and DM8 of the adopted Core Strategy, and emerging policy E18 of the HBLP 2036.

(viii) Compliance with Habitats Regulations

- 7.21 Due to the potential effect on the Solent European Sites from this proposal, a Habitats Regulations Assessment (HRA), including Appropriate Assessment (AA), under Regulation 63 of The Conservation of Habitats and Species Regulations 2017 (as amended) should be undertaken. However this has not formally been undertaken to date.
- 7.22 In terms of the potential disturbance to protected species from increased recreational harm, a mitigation package is available - the Solent Recreation Mitigation Strategy. As tourist accommodation with unknown numbers of "bedrooms", the flat rate fee of, currently £595 + monitoring and admin, would apply per pitch. The applicant has indicated that he is willing to provide such a mitigation package, but in light of other reasons for refusal, this has not been requested at this stage.
- 7.23 In terms of decrease in water quality from the increased overnight accommodation, a nutrient neutrality statement has been submitted. This asked questions and some clarification has been provided by both NE and the Council's policy team. During the course of determining this application, advances in methodology and potential water quality solutions have meant that the nutrient budget and neutrality statement would need updating and resubmitting to satisfactorily resolve this issue. Accordingly the HRA and AA remains outstanding and currently the non-provision of the appropriate avoidance and mitigation packages is a reason for refusal.

(ix) Tourism and business

- 7.24 It is estimated that the proposed campsite would generate employment for 2 full time and 5 part time staff. It would also offer overnight tourist accommodation that would help support the tourist industry of the Island and wider area. Visitors to the site would potentially make use of local services and hospitality sites, boosting the economy of the Island. Policy CS5 seeks to promote appropriate sustainable recreational opportunities, provide new tourist accommodation and improve tourist facilities. Arguably, in principle, the proposal would do that and is considered compliant with policy CS5, however this economic gain is not considered sufficient to outweigh the other harms identified above.

8 Conclusion

- 8.1 It is considered that there is a lack of detailed reports and information to demonstrate that the proposal could operate successfully from the site. Without further information it is considered that the potential harm to the rural character of the site, on habitats and species, on trees, on highway safety from use of the access, and the unsustainable location in terms of flood risk, is such that the proposal cannot be supported. The opportunity for rural tourism and modest associated employment and economic gains is not considered sufficient to outweigh the environmental harm from the proposed use and associated operational development. The proposal is therefore recommended for refusal.

9 **RECOMMENDATION:**

That the Head of Planning be authorised to **REFUSE PERMISSION** for application APP/19/00744 for the following reasons

- 1 By virtue of the site's location within a non-urban area and a coastal zone, adjacent to Langstone Harbour, which is a designated Ramsar, SAC, SPA, SSSI, Local Nature Reserve and the Hayling Billy Trail, the proposed siting of caravans and associated additional structures, hard surfacing and paraphernalia, would be detrimental to the open and rural character of the site and to the visual amenity of the area. The proposal would result in an urbanisation of the site, including possible loss of frontage hedge from visibility splay provision, that would be harmful to the sensitive setting of the area. Without a Visual Impact Assessment it has not been adequately demonstrated that the proposal would not materially harm the rural character and coastal setting of the site. The proposal is therefore considered contrary to adopted policies CS11, CS16, CS17, DM9 of the Havant Borough Local Plan (Core Strategy) 2011; policy AL2 of Havant Borough Local Plan (Allocations) 2014; emerging policies E3 and E4 of the Pre-Submission Havant Borough Local Plan 2036; and the National Planning Policy Framework.

- 2 The proposed campsite would result in increased human activity with associated noise, disturbance and light, that would disturb protected species within Langstone Harbour which is a designated SSSI, Ramsar, SAC and SPA and adjacent a Local Nature Reserve. Part of the site is also a SINCR and no Ecological information or Biodiversity Mitigation and Enhancement Plan has been submitted to address the ecological impacts. On the basis of the lack of ecological information available to the Local Planning Authority it is not considered that the proposed development could be undertaken without harm to protected habitats and species. The proposal is therefore contrary to policies CS11 and DM8 of the Havant Borough Local Plan (Core Strategy) 2011; policies DM23 and DM24 of the Havant Borough Local Plan (Allocations) 2014; emerging policies E14, E15 and E16 of the Pre-Submission Havant Borough Local Plan 2036; the National Planning Policy Framework and Wildlife and Countryside Act 1981.
- 3 The site falls within Flood Zone 3 and as holiday accommodation constitutes at least More Vulnerable development, requiring both a Sequential and Exception Test, as set out in the NPPF. In the absence of such tests and without an acceptable Flood Risk Assessment, the proposal is considered to represent unsustainable, inappropriate development in an area of high risk of flooding. Furthermore the submitted drainage solution and use of cess pit is considered inappropriate and unjustified. The proposal is therefore contrary to adopted policies CS15 and DM10 of the Havant Borough Core Strategy, 2011, emerging policies E19 and E20 of the Pre-Submission Havant Borough Local Plan 2036; and the National Planning Policy Framework.
- 4 Increased use of the existing access onto the A3023 would likely cause undue interference with the free flow of traffic and safety and convenience of the users of the adjoining highway. Without further information including interrogation of TRICS, visibility splays, geometry of the access and tracking details, it is considered that the highway safety and amenity issues have not adequately demonstrated that there would be no harm to users of the highway. Additionally the submission does not take account of the Hayling Island Transport Assessment and Addendum (January 2020). The proposal is therefore contrary to policies CS20, and DM12 of the Havant Borough Local Plan (Core Strategy) 2011; emerging policies IN3 and IN4 of the Pre-Submission Havant Borough Local Plan 2036; and the National Planning Policy Framework.
- 5 The use of the site as a campsite could generate noise and disturbance at all times of the day and night that would have an adverse effect on the amenities of occupiers of nearby properties. It is therefore contrary to policy CS16 of the Havant Borough Local Plan (Core Strategy) 2011, emerging policy E22 of the Pre-Submission Havant Borough Local Plan 2036; and the National Planning Policy Framework.

- 6 It is considered that the layout and siting of the proposed operational development and associated below ground servicing has not had sufficient regard to the precise siting of the boundary trees which are important in the local landscape. Without a more detailed Arboricultural Impact Assessment, Method Statement and Tree Protection Plan it has not been adequately demonstrated that the trees on the site would be safeguarded and retained, contrary to policies CS11 and DM8 of the Havant Borough Local Plan (Core Strategy) 2011; emerging policy E18 of the Pre-Submission Havant Borough Local Plan 2036; and the National Planning Policy Framework.
- 7 On the basis of the information submitted and in the absence of a suitable agreement to secure appropriate mitigation measures, the development would be likely to have a significant effect on the Solent European Sites as a result of increased recreational pressure and decrease in water quality. A Habitats Regulations Assessment would need to be undertaken and without the proposal is contrary to Policies CS11, CS21 and DM24 of the Havant Borough Local Plan (Allocations Plan), emerging Policies E16 and EX1 of the Pre-Submission Havant Borough Local Plan 2036 and The Conservation of Habitats and Species Regulations 2017 (as amended).