

Planning Application Response of Planning Policy

Application No:	APP/19/01131
Site Address:	Land adjacent to Mandai, St Peters Road, Hayling Island
Development:	Use of land for touring caravan site (Resubmission)
Case Officer:	Lewis Oliver
Comments by:	Jade Ellis
Date of Comments:	15 th November 2019

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 2036 (HBLP 2036) was approved by the Council on 30 January 2019 and can be afforded limited weight.

The following policies are of particular relevance:

- CS5 – Tourism
- DM4 – Static Holiday Caravan Development
- CS15 – Flood and Erosion Risk
- CS17 – Concentration and Distribution of Development within the Urban Areas
- AL2 – Urban Area Boundaries and Undeveloped Gaps between Settlements

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

- C2 | Tourism
- E3 | Landscape and settlement boundaries
- E19 | Managing flood risk in new development

It is understood that this application follows an earlier planning application reference APP/18/00207 which was dismissed at appeal reference APP/X1735/W/18/3214079 on grounds there would likely be adverse effects on the integrity of the Solent SPAs as a result of the additional waste water generated by the proposed use.

The following comments are therefore largely unchanged following the policy response to planning application reference APP/18/00207.

Principle of Development:

Policy AL2 and Policy CS17 seek to concentrate development in the defined urban area. The site in question lies outside the urban area and would therefore be contrary to these policies.

Policy CS5 supports appropriate development proposals that provide hotel and other types of tourist accommodation in principle. This is supplemented by paragraph 28 of the National Planning Policy Framework (NPPF) which states that to promote a strong rural economy, 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 could include supporting the provision and expansion of tourist and visitor facilities in appropriate locations.

The planning guidance provided by Visit Britain and Visit England indicates tourism sites must be easily accessible for visitors, and where possible enable sustainable travel. It is

however, acknowledged that many small-scale rural tourism developments are car dependent, but the use of the car does not make the proposal unsustainable. Encouraging greater domestic tourism has the potential to support jobs in rural areas, reducing out commuting.

The submitted Planning Statement also indicates the site would be restricted to three touring caravans and “those using the site would stay for 1 or 2 weeks (paragraph 5.22). In this respect, though the proposal is for the change of use of the land to a touring caravan sites, Policy DM4 generally restricts occupancy of static caravan sites to a maximum of ten months per calendar year. As such, it may be appropriate to limit the occupation/use of the site by condition accordingly.

Paragraph 5.12 of the Planning Statement suggests that in the UK there has been a decline in the traditional longer-stay holiday at a single destination in Britain has been offset by significant increases in other markets such as short breaks, second holidays, business travel and special interest or activity holidays. There is limited information with regard to how the proposal would sit with changing trends or what market the site would serve, although it is noted that there is growth in the caravan industry with relatively few facilities for touring caravans on Hayling Island (which this proposal would provide).

In terms of traffic movements, the applicant’s agent has suggested that private motor vehicles would make on average up to a total of 12 movements per day at the busiest times of the year. The site owner would visit the site to meet the caravan owners on arrival and inspect the site on a daily basis (minimum once a week when the site is unoccupied), with the toilets/showers cleaned on a daily basis.

Flood Risk: The majority of the site is located within Flood Zone 1, although a small part of the access road falls within Flood Zone 3. As the site would be used for holiday or short-let caravans, it would be classified as a ‘more vulnerable’ use as defined by Table 2 by Planning Practice Guidance (PPG). Given that flood risk is limited to the access to the site, it is not considered appropriate to require a Sequential Test for the proposed use.

Nonetheless, the PPG indicates the applicant will need to show that future users of the development will not be placed in danger from flood hazards throughout its lifetime¹. The submitted Flood Risk Assessment suggests “whilst residual risk would be present during and after a flood event the development would remain in Zone 1 would provide suitable shelter until that residual risk has fallen to a safe level.”

One of the considerations to ensure that any new development is safe (including where there is a residual risk of flooding), is whether adequate flood warnings would be available to people using the development. National guidance also indicates that a flood warning and evacuation plan is a requirement for sites at risk of flooding used for holiday or short-let caravans and are important at any site that has transient occupants. Whilst only a small part of the site is within Flood Zone 3, we would recommend that the Lead Local Flood Authority is consulted accordingly.

Conclusion:

Notwithstanding the site’s location outside of the urban area, the proposal has the potential to support small scale rural tourism development. As such, subject to appropriate conditions to secure the safety of development from residual flood risk throughout its lifetime, there is no policy objection to the development.

¹ Paragraph: 048 Reference ID: 7-048-20140306