

Planning Application Response of Planning Policy

Application No:	APP/19/000744
Address:	Poundcroft Stables adjacent 175 Havant Road, Hayling Island
Development:	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
Case Officer:	Tina Pickup
Comments by:	Jade Ellis
Date of Comments:	18 th September 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 Havant 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
- CS11 – Protecting and Enhancing the Special Environment and Heritage of Havant Borough
- CS15 – Flood and Erosion Risk
- CS17 – Concentration and Distribution of Development within the Urban Areas
- AL2 – Urban Area Boundaries and Undeveloped Gaps between Settlements
- DM9 – Development in the Coastal Zone

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

- C2 | Tourism
- E3 | Landscape and settlement boundaries
- E4 | Development on the Coast
- E14 | The Local Ecological Network
- E19 | Managing flood risk in new development

Principle of development:

The site lies outside, but adjacent to the urban area as defined by policies CS17 and AL2 in adopted local plan and as proposed to be defined by Policy E3 in the emerging Local Plan. The policies in the adopted local plan only permit development outside of the settlement boundary where it is consistent with the policies for 'rural areas' set out in national policy. It is noted however the emerging policy does not include a reference to the NPPF.

Paragraph 83 (d) of the revised NPPF specifically indicates that planning policies and decisions should enable sustainable rural tourism and leisure developments which respect the character of the countryside. In this case, it should be noted that the policies in the adopted local plan refer to 'non-urban' areas.

Policy CS5 also indicates that planning permission will be granted for appropriate development proposals around the borough that provide hotel and other types of tourist accommodation. Emerging policy C2 similarly supports proposals for the provision of new and/or improved attractions, accommodation or facilities that provide flexibility for changing market trends.

In terms of whether the development is acceptable outside the 'urban area', the key question is therefore whether the development respects the character of the countryside. This is considered in further detail below.

Development in the Coastal Zone:

The site falls within the Coastal Zone as currently defined by Policy DM9 in the Core Strategy. In this respect, planning permission will only be granted for development which addresses all of the following criteria:

1. *Has no harmful effects on nature conservation within the Chichester and Langstone Harbour SSSIs and SPA, Solent Maritime SAC and Ramsar site, or any SINCs and Local Nature Reserves.*
2. *Maintains and enhances the appearance and distinctiveness of existing settlements and landmarks along the coast.*
3. *Contributes positively to the landscape and has regard to best practice on the design of new buildings in coastal locations.*
4. *Upgrades existing footpaths and ensures that public access is retained and provided to connect existing paths along the waterfront where appropriate.*
5. *Would result in improvements to or redistribution of moorings, marine berths or launch on demand facilities (dry berths) in the harbours.*
6. *Would not be detrimental to infrastructure for, and quality of, water-based recreation, or be detrimental to the safety of navigation.*
7. *Provides recreational opportunities that do not adversely affect the character and appearance of the coast.*

Whilst the coast or a Coastal Zone is not proposed to be defined by emerging Policy E4 of the HBLP 2036, it sets out relevant considerations for 'undeveloped areas' of the coast under criterion a., and other areas of the coast under criterion b. Paragraph 5.46 of the supporting text acknowledges that:

"small stretches of coast outside of settlement boundaries are already developed, and in some instances, it may be appropriate to take into account on a case by case basis the level and nature of development in an area..."

In this case, it is noted that the site lies outside of the settlement boundary, but it would have previously formed part of the land associated with Pound House. It is also noted that the development would not be read in isolation from the frontage development on Havant Road, a short distance to the south.

Impact on character:

As set out above, the impact on the character will have a bearing on the acceptability of the principle of development in this non-urban location. Both the adopted and emerging local plan require high quality design in all development, and ensure that it respects the quality of the landscape under policies

- CS11 Protecting and Enhancing the Special Environment and Heritage of Havant Borough
- CS16 High Quality Design (Core Strategy)
- E1 | High Quality Design (HBLP 2036)
- E3 | Landscape and settlement boundaries (HBLP 2036)

The Council's Landscape Team will be able to advise further on the likely impact on the visual appearance and character of the area.

Ecological considerations:

The site is designated as a SINC and is therefore afforded protection by Policy CS11 (Core Strategy) and Policy E14 (HBLP 2036).

The site also forms part of a Secondary Support Area for Solent Waders and Brent Geese as defined by the Solent Waders and Brent Goose Strategy and emerging Policy E17 of the HBLP 2036. The policy states that development proposals on Secondary Support Areas will only be permitted where either:

g. A suitable replacement habitat is provided on a like for like basis on or within the locality of the site which is agreed and secured through a costed Habitat Management and Monitoring Plan; or

h. Where it can be demonstrated that criteria g) is not practicable, a smaller suitable replacement area is agreed and secured through a costed Habitat Management and Monitoring Plan and a financial contribution is provided consistent with the SWBG Strategy.

The Council's Ecologist will be able to provide further advice on these matters.

Flood risk:

The site lies within Flood Zones 2 and 3. As the proposals are for a change of use to a caravan/camp site as a 'more vulnerable' use, the sequential test and then the exception test would need to be passed. In the case of the former, it is noted that a pragmatic approach on the availability of sites should be taken ([Planning Practice Guidance](#) Reference ID: 7-033-20140306).

Whilst the applicant has submitted a Flood Risk Assessment and a Flood Management and Evacuation Procedure, these do not address the sequential and exception test requirements in the NPPF.

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.