
Land adjacent Mandai
St Peters Road
Hayling Island PO11 0RT

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A: The Sanderson Centre Lees Lane Gosport Hampshire – T: 023 9252 3352 – W: www.tpexpert.org - E: help@tpexpert.org

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1. Introduction

- 1.1. This statement has been prepared to support the following:
Use of land as holiday/tourism caravan site and erection of utility block
- 1.2. The application is submitted by The Town Planning Expert who act as planning consultants to the applicant.

2. Planning History

- 2.1. 05/60059/000 Outline application for construction of a chalet bungalow with shared access. Refused and appeal dismissed.
- 2.2. Application for Lawful Development for an existing Use – Material Change of Use as Leisure Plot together with retention of associated buildings and structures – Refused 21 January 2015
- 2.3. Enforcement Notice – cease use as leisure plot. Appeal dismissed,
- 2.4. APP/17/00942 - Use of land as touring caravan site and alteration of access - withdrawn
- 2.5. APP/18/00207 - Use of land as holiday/tourism caravan site and erection of utility block - Refused. 21 September 2018 Appeal Dismissed

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3. Site Context

- 3.1 The site is a rectangular-shaped plot of land, approximately 0.14 ha (0.33 acres) in size, lying on the west side of St Peter's Road at the southern extremity of North Hayling.
- 3.2. It lies immediately to the south of the property known as Mandai a two-storey house separated from the land by fencing and hedging.
- 3.3. The land is currently occupied by 2 caravans, one permanently sited and a touring caravan, a wooden shed, a shipping container and associated paraphernalia.

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4. Policy Framework

4.1 National Policy

- 4.2 The National Planning Policy Framework (NPPF) was introduced on March 27 2012, and sets out the Government's planning policies for England and how these are expected to be applied.
- 4.3 It indicates that the purpose of the planning system is to contribute to the achievement of sustainable development. It identifies that there are three dimensions to sustainable development – economic, social and environmental.
- 4.4 Planning can assist the economic role by building a strong, responsive and competitive economy; the social role by supporting strong, healthy and vibrant communities, and the environmental role by protecting and enhancing our natural, built and historic environment. These roles are seen as mutually dependent.
- 4.5 The NPPF advises in para 9 that “Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people’s quality of life”. This can include, creating jobs, replacing poor design with better designs, and improving the conditions in which people work, live, travel and take leisure.

- 4.6 In para 10 it advises that “Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.”

4.7 Tourism

- 4.8 In 2006 the Government produced a Good Practice Guide for Planning for Tourism, which is designed to:
- ensure that planners understand the importance of tourism and take this fully into account when preparing development plans and taking planning decisions
 - ensure that those involved in the tourism industry understand the principles of national planning policy as they apply to tourism and how these can be applied when preparing individual planning applications and
 - ensure that planners and the tourism industry work together effectively to facilitate, promote and deliver new tourism development in a sustainable way

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- 4.9 Para 2.4 explains that “tourism can bring many broader benefits that will contribute to the economic and social well-being of local communities as well as to individuals.”
- 4.10 It advises in para 2.5 that the revenue from tourist uses can support and enhance local services and facilities such as pubs and shops, and underpin the quality of the local environment.
- 4.11 Annex A to the guidance relates to Tourist Accommodation. It advises that despite the diversity of accommodation “all are capable of bringing economic benefits to the areas in which they are located.” and points out that “these benefits will need to be assessed alongside other issues such as suitability of the location in terms of its sustainability.”
- 4.12 Annex B deals with Seasonal and Holiday Occupation Conditions. In para 3 it advises that:
- “The aim of such conditions is generally to ensure that the premises are only used by visitors and do not become part of the local housing stock.”
- 4.13. Local Policy**
- 4.14 The Havant Borough Core Strategy was adopted on 1 March 2011 and sets out local planning policy until 2026. The Strategy sets out a vision for the Borough which it intends to meet by seeking an appropriate balance
- between protecting the natural and built environment; delivering new economic growth and community regeneration; meeting the social needs of its communities and the prudent use of natural resources.
- 4.15. Policy CS5 relates to tourism and states:
- Planning permission will be granted for appropriate development proposals around the borough that:*
1. *Provide sustainable and small scale recreational opportunities.*
 2. *Provide hotel and other types of tourist accommodation.*
 3. *Safeguard existing tourist facilities, hotels, holiday centres and caravan parks.*
 4. *Improve existing tourist facilities, hotels, holiday centres and caravan parks.*
- 4.16. Policy CS16 relates to High Quality Design and indicates:
- Planning permission will be granted for development that is designed to a high standard, which helps to create places where people want to live, work and relax.

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- 4.17. Policy C17 identifies where new development will be encouraged, and states

1. Development will be permitted that makes the most effective use of land in the borough by granting planning permission that:

Concentrates new housing, employment, retail, leisure and other development within the five urban areas of Havant, Leigh Park, Waterloooville, Emsworth and Hayling Island, as shown on the Proposals Map.

2. Prioritises development on previously developed land, including redundant, derelict or underused land and buildings within the urban area.

- 4.18. Policy CS18 seeks to Protect and Enhance the Special Environment and Heritage of the Borough. In particular development should be designed in order that it:

Protects and where possible enhances the borough's statutory and non-statutory designated landscape, habitats and features of biological, hydrological or geological interest. Protection and enhancement will be achieved by appropriate adaptation and mitigation measures including wardening, education and information and the creation of new habitats, water bodies/courses planting of new trees and woodland.

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5. Planning Principles

- 5.1. This application is a resubmission of that submitted in 2017.
- 5.2. That application was refused for the following reason
- The proposal represents the undesirable addition of a touring holiday/tourism caravan site in a non-urban area, for which there is no overriding justification, and which would adversely affect the character and appearance of the countryside. It is therefore contrary to policies CS9 and CS17 of the Havant Borough Local Plan (Core Strategy) 2011, policy AL2 of the Havant Borough Publication Local Plan (Allocations) and the National Planning Policy Framework 2012.
- 5.3. During the course of the subsequent appeal the Council advised that it should have referred to Policies CS5 and CS16.
- 5.4. The Council also drew attention to concern by Natural England regarding the discharge of nitrates into the Solent, and the need for developers to prove nitrate neutrality before permission can be granted.
- 5.5.. Both issues will be addressed subsequently.

The Proposal

- 5.6. The proposed site is immediately adjacent to housing in North Hayling, and has been used as an informal garden for many years.
- 5.7. It enjoys its own access off St Peters Road, and is screened by existing hedges from public vantage points.
- 5.8. The site has its own electricity and water supply and has toilet/shower facilities.
- 5.9. The proposal is to provide up to 3 pitches for touring caravans.
- 5.10. National and local policies support small-scale tourist facilities in the countryside, and given the importance of leisure facilities on Hayling Island this proposal is seen as complementing the existing offer.
- 5.11. Tourism makes a major contribution both to the national economy and to the prosperity of rural areas. Its continuing growth generates a range of economic activity and new job opportunities. Government policy seeks that the planning system should therefore facilitate and encourage development and improvement in tourist provision, while tackling any

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- adverse effects of existing tourist attractions and activity in a constructive and positive manner.
- 5.12. In recent years the growth in tourism has been accompanied by changes in the types and distribution of tourism. Decline in the traditional longer-stay holiday at a single destination in Britain has been partially offset by significant increases in other markets. These include short breaks, second holidays, day trips, business travel and special interest or activity holidays. Such trends are effectively extending the length of the "holiday season" and bringing economic benefits.
- 5.13. To cater for such growth there is a need to provide additional accommodation suited to such activities. Touring caravans are one such area of growth. Self-catering accommodation, 40% of which is accounted for by caravans, accounts for almost two-thirds of all commercial tourist bednights in England. In Britain as a whole, 13 million people take holidays in caravans.
- 5.14. Much of Hayling Island's caravan industry is based on static caravans which are rented out for the summer season. There are in comparison few facilities for touring caravans
- 5.15. The popularity of touring caravans and motor homes is increasing, and is reckoned to contribute £6bn to the UK economy
- 5.11. Hayling Island is a popular holiday destination with its sailing and water based activities, beaches and walking facilities. Attractions nearby include the Billy trail and Northney Farm.
- 5.16. In addition to supporting local tourist attractions, visitors are likely to frequent local pubs and restaurants, and use local shops to obtain food and other necessities.
- 5.17. The site is well screened by existing mature hedgerows on all sides so the caravans would not be visually intrusive in the countryside. Additional fencing would be provided as suggested in the Ecological Report.
- 5.18. As indicated above the site already enjoys electricity and water supplies. Toilet and shower facilities would be anticipated to be provided near the entrance re-siting the existing shower/toilet building or as required by the site licence. These would be connected to the main sewer. No additional facilities would need to be brought on to the site.
- 5.19. The toilet block would provide for the emptying of chemical toilets.
- Access/Highways**
- 5.20. Access to the site is good being served by the U615 St Peters Road, which is subject to a 30 mph limit. Bookings would be taken in advance via the internet and caravans would be directed to access and exit the site
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by the northern junction with Havant Road, near Langstone Bridge, as visibility is better than by the Yew Tree PH.

- 5.21. The entrance to the site would be improved by widening to 4.2 metres, allowing 2 vehicles to pass, while the radius to the northern side of the entrance would be formalised with kerbing, and the vegetation trimmed back again to encourage visitors to enter and leave via that direction.
- 5.22. The number of sites would be restricted to three, and it is anticipated that those using the site would stay for 1 or 2 weeks, using the site as a base to explore the local area.
- 5.23. Hardstandings for the caravans would be restricted to concrete strips to form a hard surface under the wheels, while retaining the rural appearance of the site. If required caravan movers will be provided to facilitate moving caravans within the site.
- 5.24. Specific provision for bicycles is not proposed as it is considered that those wanting to use such facilities will bring their own.
- 5.25. As such the caravans would make no more than six movements a week with private motor vehicles making on average up to a total of 12 movements per day at the busiest times of the year. (see Transport Statement)

- 5.26. It will be noted that the Highway Authority had no adverse comment to the previous application subject to provision of the sight lines as indicated and the engineering works referred to in the Transport Statement

Flood Risk

- 5.27. The site is within Flood Zone 1, although the access and adjoining road fall within Flood Zone 2. Flooding would be tidal and likely to occur during winter months when the site could be expected to be unoccupied. Such flooding by its nature would only be of short duration and any people could wait in the site for the water to subside. As such this proposal will not put a significant number of additional buildings or persons at risk from a flood event. (See Flood Risk Assessment).
- 5.28. It will be noted that the Environment Agency had no objection to the previous application

Ecology

- 5.29. The site adjoins an area frequented by Brent Geese and other migrating water fowl. There is a currently a caravan on site and as the proposals only involve the addition of two more caravan plots with all management activities to be carried out by the property owner at intervals during the summer or autumn, there should be minimal impact on Brent Geese and other overwintering birds using the adjacent arable field. Also, the majority

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of the activity on the site is likely to be during the summer months. In addition, the site is screened from this field and the adjacent property) on all boundaries by fencing and hedges or tree-lines. (See Ecological Report)

- 5.30. Alterations to the fencing as recommended would be undertaken to enhance the screening while lighting would be limited to security lighting only as at present.
- 5.31. It will be noted that the County Ecologist had no adverse comment to the previous application subject to any approval being subject to a condition to secure the ecological mitigation measures.

Character and Appearance

- 5.32. In refusing the previous application the Local Planning Authority considered that the proposal would adversely affect the character and appearance of the countryside.
- 5.33. This was however discounted by the Inspector on appeal who advised:

16. The appeal site comprises a parcel of land located at the entrance of the small village of Northney, and lies immediately to the south of a residential property known as Mandai, which it was severed from a number of years ago. As part of my site visit, I was able to observe that

the plot is clearly separated from Mandai and is largely screened on all sides by mature landscaping. The site is otherwise surrounded by open fields.

17. CS Policy CS17 sets out the settlement strategy for the area administered by the Council, which seeks to concentrate new development within the five urban areas of Havant, Leigh Park, Waterlooville, Emsworth and Hayling Island. Policy AL2 of the Havant Borough Local Plan (Allocations) – July 2014 (LP) further emphasises the Council's settlement strategy, whilst making clear that land outside the defined urban area of Hayling Island is 'non-urban' rather than undeveloped gap. As shown on the Proposals Map, the appeal site lies outside the defined urban areas of Hayling Island. It is therefore located in a non-urban area where, in accordance with CS Policy CS17, development will only be permitted if it is consistent with the policies for the countryside set out in national policy.

18. CS Policy CS5 supports development proposals that provide hotels and other types of tourist accommodation, which are not restricted to urban areas. Camping facilities are not generally associated with the urban environment and are more commonly found in countryside locations. The proposed caravan site would be located outside an urban area, but would support small scale rural tourism. Paragraph 83 of the Framework advises that planning decisions should enable sustainable rural tourism and leisure development which respect the character of the

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countryside. Additionally, paragraph 84 of the Framework recognises that sites to meet local business needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.

4 19. As noted above, the site lies just outside the village of Northney and within proximity to residential properties. Whilst the caravan site would include some permanent features such as a site cabin, it would have a limited effect on the character and appearance of the area due to the transient nature of the use, the screening provided by the mature trees and landscaping, and the limited scale and massing of the caravans and other structures on the site. Equally, any additional paraphernalia associated with the proposed use would to a large extent be screened by the existing landscaping, fencing and gate to the front of the site.

20. For the foregoing reasons, I consider that the effect of the proposal on the character and appearance of the countryside would be acceptable, and therefore find no conflict with the design aims of CS Policy CS16. Furthermore, the appeal scheme would accord with the policies for the countryside as detailed within the Framework, and there would subsequently be no conflict with CS Policies CS5 and CS17, as well as LP Policy AL2.

(Appendix A - refers)

- 5.34. In the applicant's opinion nothing has changed to warrant any other decision.

Nitrate Neutrality

- 5.35. In June 2019 Havant Borough Council issued its Position Statement on Nutrient Neutral Development. Although issued prior to the determination of the appeal the Inspector considered that at that stage the Council's approach was not sufficiently precise to overcome the potential for this site to address the concerns regarding additional discharge of nitrates into the Solent either in isolation or in combination with other developments.
- 5.36. The Statement indicates that when submitting planning applications, applicants will need to include a 'European Sites Mitigation Checklist' to set out how any likely significant effects on European Sites will be mitigated through the application.
- 5.37. Where, as in this instance, the development is on non-agricultural land and will not be able to provide mitigation on-site, the Council will impose a Grampian Condition This will ensure the provision of an avoidance and mitigation scheme prior to the occupation of the site.
- 5.38. It is envisaged that this may mean the payment of a financial contribution in due course. This is acceptable in principle to the applicant.

Management

5.33. The following sets out how the applicant envisages the site will be operated.

5.32 Booking and Greeting

- The site would be advertised on a dedicated website and relevant local tourism sites.
- Bookings would be taken on-line, with payment by credit card
- Once booked, a list of terms and conditions would be sent together with the number for the key lock on the gate.
- Depending on time of arrival caravan owners would be met on site on arrival, or first thing in the morning. Reminder of terms and conditions and details of local tourist attractions will be provided and any other issues addressed.

5.33 Management

- Owner would visit daily when touring caravans are on site and as necessary (minimum once a week) when site is unoccupied to keep site and facilities clean and tidy
- Refuse bins, both general and recycling, would be provided near the gate and emptied regularly
- Toilets/showers would be cleaned daily when site is occupied.
- Electricity and water is provided on site.
- No fires would be permitted on site.
- Guests would be expected to keep noise to a minimum. (Given lack of facilities on site it is anticipated that users would be older people rather than families).
- Visitors would be asked to bring any issues with the site to the owner's attention and these would be dealt with as appropriate.

5.34. Departure

- Caravan users would be expected to depart by 10 a.m. after their last night's stay.

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- Site will be checked by owner and any issues rectified

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6.0 Conclusion

- 6.1. The proposal to utilise this site for the provision of touring caravans would add to and support the existing tourism offer on Hayling Island.
- 6.2. It already enjoys main services, and is screened from public view by mature hedgerows such that there would be no detriment to the character and appearance of the area.
- 6.3. The site enjoys good access and the limited scale of the operation would not interfere with highway safety.
- 6.4. The use of the site would have minimal impact on local bird activities.
- 6.5. The site is within Flood Zone 1 so not at risk from flooding.
- 6.6. The applicant is willing to accept a Grampian Condition which would preclude occupation until such time as nitrate neutrality is confirmed.
- 6.7. The proposal is considered to comply with national and local policies and as such it is requested that planning permission be granted.

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