

Planning Application Response of Planning Policy

Application No:	APP/17/00942
Address:	Land adjacent to Mandai, St Peters Road, Hayling Island
Development:	Use of land for touring caravan site and alteration of access
Case Officer:	Lewis Oliver
Comments by:	Jade Ellis
Date of Comments:	22/11/2017

Policy Status: The Local Plan (Core Strategy) and the Local Plan (Allocations) provide the development plan for the borough. The Local Plan Housing Statement (LPHS) is also a material consideration.

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 in order 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. In this respect, very limited information has been provided with regard to the proposed business operations and the management of the site.

The submitted Planning Statement indicates the site would be restricted to three touring caravans and *“those using the site would stay for 1 or 2 weeks, as a base to explore the local area”* (paragraph 5.18). Paragraph 5.7 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.

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, relatively limited information has been provided with regard to the proposed management of the site. For example, it would be useful to understand details of measures that would be taken to reduce visitors' reliance on the private car, and whether the site would support any local employment associated with the management and maintenance of the site.

Highway capacity and single access onto the island were some of the key issues raised in response to the Draft Local Plan Housing Statement consultation. Whilst the site would not be occupied on a permanent residential basis, nor be likely to generate a significant number of trips by virtue of its scale and nature, it would affect the profile and distribution of trips across the island's highway network. In this respect, a number of transport evidence base

studies including a microsimulation model of the island's highway network are underway to inform the Draft Havant Borough Local Plan 2036.

The consultation on the Draft Local Plan will be considered by Cabinet on 18 December. Subject to its approval by Cabinet, consultation will take place in January and February 2018.

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. The Environment Agency has raised an objection in the absence of a Flood Risk Assessment accordingly. In this respect, 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 \(PPG\)](#), and would involve an increase in flood risk. The PPG therefore indicates the applicant will need to show that future users of the development will not be placed in danger from flood hazards throughout its lifetime (Paragraph: 048 Reference ID: 7-048-20140306).

The NPPF indicates a sequential test should be undertaken, and that development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. In this respect, national guidance¹ advises that when applying the Sequential Test, a pragmatic approach on the availability of alternatives should be taken.

In addition to the above, compliance with the Exception Test will need to be demonstrated (paragraph 102 of the NPPF). Of particular relevance to this site will be the need to ensure safe access and agrees as part of demonstrating the development will be safe as part of the Exception Test. However, the Exception Test should not be attempted unless the Sequential Test is passed.

Ecology: The site also lies to the west of the SPA, SAC, SSSI and SPA, and therefore any development should avoid any adverse impacts on these designations. Specifically, the consultee response from the Council's Ecologist has indicates the site falls within a larger field identified as being used by Waders and Brent Geese. As such further information is required from the applicant in respect of the potential impacts of the proposed development on the supporting habitat for the SPA/Ramsar designations.

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, there is no 'in principle' policy objection to the proposed use in this location. However, there is very limited information available in respect of the proposed business operations and the management of the site which is required in order to assess the sustainability of the proposal.

As set out above, there does however, remain outstanding issues with regard to flood risk and ecology which need to satisfactorily be resolved.

¹ Paragraph: 033 Reference ID: 7-033-20140306 Revision date: 06 03 2014