

- Extensive car and coach parking
- Former Pitch & Putt Golf Course

In terms of the surrounding uses, the north of the park is bound by the Mill Rythe estuary forming part of Chichester Harbour. The east and west of the park is surrounded by open fields with the 9 hole Tournembury Golf Course lying to the south. There is residential development and Mill Rythe Primary and Junior Schools are further to the west of the site which abuts the A3023 Havant Road.

2 **Planning History**

00/54406/023 - Alterations to existing chalets including landscaping, UPVC cladding and internal layout changes., NPW,13/03/2003
 99/54406/021 - Infill extension to east elevation of staff chalet block (south east of main building), PERM,14/05/1999
 99/54406/022 - Infill extensions to east and west elevations of 'Norfolk' and 'Nutley' chalet blocks (on eastern side of site), WD,15/02/2000
 98/54406/019 - Siting of new mobile home for additional staff dwelling to south east of Holiday Village, REF,26/11/1998
 98/54406/020 - Siting of new mobile home for additional staff dwelling to south of Holiday Village, REF,26/11/1998
 97/54406/017 - Renewal of temporary planning permission 92/54406/4 for the siting of 4 staff caravans, TPP,16/10/1997
 97/54406/018 - Infill extension under existing roof canopy to one side of chalet block, PERM,03/02/1998
 95/54406/015 - Outdoor all weather 4 lane bowls rink including floodlighting., PERM,26/10/1995
 95/54406/016 - Two floodlights attached to piers of entrance archway to illuminate archway sign, ,14/12/1995
 94/54406/011 - Two Halogen floodlights mounted on existing columns to illuminate existing arch entrance sign., REF,15/09/1994
 94/54406/012 - Extensions to York and Wells chalet blocks, PERM,15/11/1994
 94/54406/014 - New bedroom accommodation; enlarged restaurant; improved indoor pool; sports hall; outdoor sports facilities; floodlights; car parking and landscaping, ,04/01/1996
 93/54406/010 - Arched entrance sign letters on wrought iron work, PERM,07/03/1994
 93/54406/008 - Extensions to provide glazed reception area concourse, ballroom extension and childrens amusement building, PERM,
 91/54406/002 - New general manager's house and car port in south western corner of site., PERM,23/04/1992
 92/54406/004 - Renewal of temporary Planning Permission 88/50376/2 for the siting of 4 staff caravans., PERM,
 92/54406/005 - Double car port at General Managers house - Mill Rythe Holiday Village, PERM,
 92/54406/006 - Retention of existing abseiling tower in northwest area of site adjacent to Chichester Harbour., PERM,
 08/54406/024 - Internal alterations to and external refurbishment of "Dover" block, Mill Rythe Holiday Village, Hayling Island. Replacement of 24No. one bed short stay units with 8No. one and two bed medium stay flats., PERM,15/05/2009
 GEN/10/00552 - Alternative uses of site., UNK,
 GEN/10/00553 - Planning history, ,24/08/2010 12:29:22

GEN/10/00659 - Request for documentation relating to application 54406/24, ,06/10/2010 11:47:43
 GEN/11/00329 - Proposed siting of 31 static caravans, UNK,
 APP/11/01080 - Change of use of part of the land for the siting of 31 static caravans (approved). Request to discharge conditions 4, 6 and 7 (received 27.5.16). Request to discharge condition No.s 3,5 and 8 (received 09.06.16). , PERM,07/06/2013
 APP/12/00714 - Tree works., UNK,
 GEN/15/00144 - Information about the site., UNK,
 GEN/16/00218 - Development potential, ,25/04/2016 14:46:54
 APP/16/00573 - See supporting documents., UNK,
 APP/16/00606 - See supporting documents
 All documents transferred to APP/11/01080 13.06.16, UNK,
 GEN/16/00831 - Proposed redevelopment of site., ,08/09/2016 18:38:38
 APP/16/01193 - Use of land for Linear High Ropes Course., PERM,12/01/2017

3 Proposal

The proposal is for the demolition of 6,111 square metres of redundant chalets and facilities buildings, use of land for the siting of 203 holiday caravans including 5 caravans for use as staff accommodation, refurbishment of retained single and two storey holiday chalets to form 87 units of holiday accommodation, retain managers bungalow, sales area for 5 caravans, refurbishment of remainder of central facilities building, CCTV cameras, provision of new pedestrian concourse with terraces, splash and dry play areas, multi-games court, adventure golf course and outdoor theatre and new landscaping. The proposal includes the retention of the existing pitch and putt golf course to the east of the site.

The proposed development of the site includes the retention and improvement of some buildings. The improvements to the central complex building involve the demolition of sub-standard facility areas creating new guest services and caravan sales, main entrance and arcade areas and shop. All remaining areas of the building to be retained will be fully refurbished. A range of new external activity areas would be accessed from the complex building, with the overriding objective that the proposals provide enhanced leisure facilities for the holiday park guests. A number of existing single and two storey chalet buildings would be demolished as part of the works with the retained chalets being refurbished both internally and externally. The demolition of chalet buildings and complex buildings allows for the formation of 181 No. caravans which provides the park a variation of accommodation types. The application submission indicates that there will be no increase in the permitted number of holiday units at the site as they would not accommodate any increase in the number of people staying at the site. The layout of the caravans however results in the spread of development across the site, with the associated internal roads, paths and open space.

Provision is made for parking in a central location through a number of parking courts which will include disabled / accessible spaces constructed upon internal access roads. Each caravan would have a parking space next to the unit and required parking for the chalet blocks will be provided via parking courts with link footpaths.

This application has been amended following concerns raised regarding the impact of the development on the character and appearance of the area, adjacent AONB and on protected species, which utilise the pitch and putt golf course for feeding. The proposal has subsequently been amended to address the concerns raised, this has

resulted in the following amendments:

- removal of 1 caravan and amendment to the layout in order to create additional areas of open space which have been created to give users designated areas for informal play
- proposed additional footpaths to create a more cohesive flow around the park
- a revised landscaping strategy, which involves the creation of an area of informal open space, located within the existing pitch and putt
- the closure of the pitch and putt golf course during the winter months in order to provide mitigation to allow the brent geese and solent waders to nest without disturbance during this period.

Further ecological information has also been submitted following concerns raised from Natural England and the Council's Ecologist, this is the form of surveys to assess the impact on protected species known to be in the surrounding area.

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)
CS13	(Green Infrastructure)
CS15	(Flood and Coastal Erosion)
CS16	(High Quality Design)
CS5	(Tourism)
DM10	(Pollution)
DM3	(Protection of Existing Employment and Tourism Sites)
DM4	(Static Holiday Caravan Development)
DM8	(Conservation, Protection and Enhancement of Existing Natural Features)
DM8	(Conservation, Protection and Enhancement of Existing Natural Features)
DM9	(Development in the Coastal Zone)

Havant Borough Local Plan (Allocations) July 2014

DM23	(Sites for Brent Geese and Waders)
AL2	(Urban Area Boundaries and Undeveloped Gaps between Settlements)

Listed Building Grade: Not applicable.

Conservation Area: Not applicable.

5 Statutory and Non Statutory Consultations

Arboriculturalist

No Objection subject to conditions

Building Control, Havant Borough Council

Some of the access roads for the holiday accommodation would appear to not meet the requirement B5, as they appear too narrow or have not been provided with adequate

turning circles for the Fire Authority vehicles. Consultation with the Fire Authority should be considered for the proposed arrangement.

Bin storage provisions for the main complex building and all holiday accommodation should be provided.

Chichester Harbour Conservancy

Objection to original plans - The proposed siting of 204 holiday caravans does produce cause for concern. There is much greater intensive coverage of development over the existing site with this part of the proposal. Currently the site entrance area for example, is largely open. The proposed caravans are shown on the proposed site plan as using all the land, building right up to the existing site boundary, around a series of small access roads and being enclosed with planting. The proposed caravan development area plan shows static caravans with white elevations and red or grey clad roofs. There is concern with the cumulative visual impact with the overall number of static caravans together their proposed colour, particularly in planted setting; increasing their prominence when seen in the wider landscape. It is accepted that an extensive landscaping scheme is proposed but these structures should not be allowed solely on the basis of landscaping. The applicants Visual Landscape Impact Assessment in paragraphs 8.9 and 8.11 relies heavily on the use of planting and screening. The proposed caravans should be an appropriate form of development in their own right. These caravans when viewed from the wider landscape could be intrusive particularly if the landscaping does not establish in this exposed environment this would not comply with Policy CS12 of the Adopted Core Strategy.

The refurbishment of the retained two storey chalets show the main elevation of the existing flat roofed building being broken up with gable facing features and being clad in 'eternit boarding' in a colour to be confirmed. The roof style would change from a flat roof to a pitched gable roof. The suggested colour palette are pale cream, grey or green 'eternit boarding' and the proposed balconies at first floor level would be white coloured steel. The single storey chalets show re-cladding in 'eternit boarding' of the suggested colour palette above with white contrasting soffits and window frames. This proposed refurbishments of these building would be a New England style. There is no concern with the principle of refurbishing and upgrading existing tourist accommodation on this site but the refurbishment needs to meet the criteria in PP01 and PP08 of the Conservancy's Planning Principles. The Conservancy would prefer to see the use of more natural materials such as cedar boarding and darker window frames to help the buildings blend into their planted backdrop when viewed from the wider landscape.

The Chichester Harbour AONB Design Guidelines for dwellings and new extensions 2010 suggest appropriate materials when refurbishing replacing buildings in a planted setting on page 6 under section 5 Colour, Appearance and Finish. "Choice of colour and finish of materials can be one of the most important design factors in reducing the impact of the building on the landscape. Generally very light colours (such as white, cream and light grey) and large areas of intense strong colours do not blend well with the rural landscape of the AONB, which in general is characterised by subtler, darker colours." Page 8 also assesses the impact of windows and the colour of window frames. It states "Careful consideration should be given to the colour of window frames where the building lies within a rural or natural setting and is visible from the wider landscape. In these instances it is usually more appropriate to choose a more muted, darker or non-contrasting colour to the elevations, so as to minimise the visual intrusion of the building within its natural landscape setting." Although this proposed

development is not a replacement dwelling or extension the same principles apply to the refurbishment of this holiday accommodation in this sensitive landscape context. The current proposed finishes as suggested for the chalet buildings of eternit boarding with contrasting white window frames and soffits in Figure 1.4 of the Design and Access Statement whilst better than those shown in Figure 1.2. at the pre-application stage; would still not fit the criteria given above and are likely to make these existing buildings more intrusive from the wider landscape not complying with policy CS12 of the Adopted Core Strategy.

The central facilities/main complex building is visible from the wider landscape to the north. The proposed changes to north elevation of the main complex building include a more extensive glazed area but this is successfully compensated by the vertical subdivision of the windows and the use of a brise-soleil. Again we would prefer to see the use of natural cladding on the building and the use of non-contrasting or darker colour window frames on this elevation to enable the building to fit its planted context for the reasons described above.

Light Pollution

We accept that no overall increase in the number of permitted holiday units is proposed, there is the potential for greater recreational disturbance and for more light pollution at night time. There is no assessment of light pollution as part of this application. The Conservancy would recommend the applicant provide a statement outlining where the light will shine, when the light will shine, how much light will shine in accordance with its Planning Principle PP09.

The CHC Ecologist concurs with the comments made by the Senior Ecologist at Hampshire County Council and the Strategy Lead for Planning and Development at Hampshire and the Isle of Wight Wildlife Trust:

The issue of wintering birds are particularly relevant during the demolition/construction phase. Once completed, consideration of visitor usage of the paths adjacent to the water should be made, to mitigate or reduce impacts on wintering birds.

Monthly WeBS (Wetland Bird Surveys) of the sector immediately adjacent to the site (Tournurbury to Mill Rythe 20435) from winter of 2015-16 showed that average monthly counts of wintering birds were 2,052 (peak of 3,885), with peaks of 2,000 Dark-Bellied Brent Geese, 1,510 Wigeon and 530 Lapwing.

Records from www.solentbirds.org.uk also indicate that Brent Geese use the grassland between the existing caravans and the pond to the north east.

The CHC AONB Manager is concerned that insufficient ecological consideration has been given to the close proximity of the adjacent Site of Importance for Nature Conservation (SINC) and Special Protection Area (SPA), therefore the LPA may not be sufficiently informed enough to make a determination.

Recreational disturbance is a significant concern at Chichester Harbour AONB. It is understood that this development would be exempt from the Solent Recreation and Mitigation Partnership (SRMP) payments despite potentially resulting with an influx of people to the area. With sufficient mitigation in place, it can be assumed that the development is likely to lead to increased instances of disturbance.

There is scope for further protected species surveys (inc. Bats, vegetation and habitats)

so as to better understand the likely impacts of the development.

The local planning authority is advised that Chichester Harbour Conservancy recommends refusal of this application.

Response to amended plans -

The PCC resolved to maintain the Conservancy's **objection** and were not persuaded by the submitted LVIA and assertion that no harm would result to the setting of the AONB, contrary to adopted Policy CS12.

The PCC were also concerned that the intensification of use and potential for greater numbers to be present at the site, all year round (not in compliance with the principles of adopted Policy DM4), in terms of greater recreational disturbance at the harbour shoreline and greater strain placed on sewerage infrastructure.

Coastal Engineering

The site is shown to lie within the Environment Agency's Flood Zone 3, and is therefore considered to be at high risk of experiencing a 1:200 year extreme tidal flood event (0.5% annual probability). For your information the present day 1:200 year extreme tide level for Chichester Harbour is 3.3mAODN, increasing to a predicted 4.5mAODN by the year 2115 due to the effects of climate change.

The applicant has submitted a Flood Risk Assessment (FRA) compiled by Nijhuis H2OK Ltd, the details of which outline how the residual flood risk at the site will be mitigated. It is worth noting that the FRA states that the Park owners are the riparian owner of the existing defences and that the SMP policy states 'Hold the line' for the next 100 years. The SMP policy does not guarantee that defences will be in place for the lifetime of the development and it is the responsibility of the owner to maintain the defences and upgrade the defence crest heights, as required, to ensure that the 1/200 year standard is sustained.

County Archaeologist

Hayling Island is particularly rich in previously recorded archaeological activity and it is entirely possible that as yet unrecorded archaeological features and/or deposits exist within the site which is located just off the high ground on the eastern coast, with evidence for Bronze Age and later medieval activity immediately to the south. The site itself has been previously used as an Army camp before being developed into the currently holiday centre. From the aerial photographic evidence we hold it seems clear that large areas of the site have been impacted by this 20th century development which is likely to have included some landscaping work. Although this later development is likely to have removed or heavily truncated archaeological features, it is possible however that as yet unrecorded archaeology may survive within areas of open ground, particularly in the western quarter of the site. What is required at this stage is to establish the extent to which these areas of open ground have been disturbed during 20th century development and what, if any, archaeological potential survives. Therefore while there is no indication that archaeology presents an overriding concern I would advise that the assessment, recording and reporting of any archaeological deposits affected by construction be secured through the attachment of a suitable condition to any planning consent that might be granted.

Council's Ecologist

Thank you for consulting me on this application. I consider that ecological matters are now resolved, subject to conditions.

The application is now accompanied by a Habitats Regulations Assessment Screening Report Revision C (Middlemarch, April 2017) which provides further details on the proposed avoidance and mitigation of potential impacts to adjacent internationally-designated sites. I welcome the steps made by the applicant team in addressing my previous concerns. I note that the latest consultation response from Natural England dated 10th April is positive and concludes that, subject to certain conditions, the proposals would not result in impacts to the European sites.

The potential disturbance impacts to dark-bellied brent geese using SWBGS Site H43 (the pitch-and-putt to the east) are to be essentially avoided by the restriction of access during the period 1st October to 31st March. This will effectively remove any potential disturbance issues to SPA supporting habitat and are welcomed. A similar restriction is proposed for the section of sea wall immediately north of the site. Again, this is welcomed.

Overall, the proposed avoidance and mitigation measures are agreeable and therefore, if you are minded to grant permission, can I suggest that these are secured by condition alongside a Construction Environment Management Plan (CEMP) and a Landscape and Ecological Management Plan (LEMP).

Development shall proceed in strict accordance with the ecological avoidance and mitigation measures detailed within the Habitats Regulations Assessment Screening Report Revision C (Middlemarch, April 2017) unless otherwise agreed in writing by the Local Planning Authority. All avoidance and mitigation features shall be permanently retained and maintained in accordance with the agreed details. Reason: to protect biodiversity in accordance with the Conservation Regulations 2010, Wildlife & Countryside Act 1981, the NERC Act (2006), NPPF and Policy CS 11 of the Havant Borough Core Strategy March 2011.

Prior to the commencement of development activities a detailed Landscape and Ecological Management Plan (LEMP) shall be submitted to and agreed in writing by the Local Planning Authority. This shall include, but not be restricted to: details of all avoidance and mitigation measures in relation to SPA bird species; details of habitat management measures for the SINC; details of ecological enhancement measures for the remainder of the application site. All mitigation and enhancement features shall be permanently retained and maintained. Reason: to protect biodiversity in accordance with the Conservation Regulations 2010, Wildlife & Countryside Act 1981, the NERC Act (2006), NPPF and Policy CS 11 of the Havant Borough Core Strategy March 2011.

Crime Prevention -Major Apps

Having considered the application I have the following comments to make with reference to crime prevention.

To provide for the safety and security of residents and visitors lighting should conform to the relevant sections of BS 5489:2013.

I would remind the developer that the relevant sections of approved document Q may

apply to the staff caravans and possibly the holiday caravans.

Environment Agency

We can confirm that the Environment Agency has no objection in principle to the proposed development as submitted.

Advice to Local Planning Authority (LPA) / Applicant:

The vulnerability and flood risk to the site and surrounding area will not increase as a result of the proposed development as the number of units will not increase.

As the proposed development comprises the same number of holiday units, the proposed development can be considered as 'like for like' and so there is no increase in vulnerability to the site.

The submitted flood risk assessment (FRA) produced by nijhuis H20K in September 2016 (reference number J-10847) confirms that the present day flood risk from extreme sea levels to the site is 3.3mAOD, rising to 4.5mAOD in 2115.

Finished floor levels are proposed to be no lower than 1.115mAOD. Therefore, over its lifetime the proposed development is subject to internal flood depths of approximately 3.3m. The local planning authority will need to determine if this risk is acceptable.

The applicant proposes to mitigate this risk with a flood evacuation plan. The Environment Agency does not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network.

The Planning Practice Guidance to the National Planning Policy Framework (NPPF) for Flood Risk and Coastal Change states that those proposing developments should take advice from the emergency services when producing an evacuation plan for the development as part of the flood risk assessment.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions.

The applicant acknowledges that the existing defences near the proposed development will only provide a 1 in 200 year standard of protection until 2041. Whilst the FRA acknowledges that the holiday park are the riparian owners of the defence and recommend maintenance at a minimum of every 5 years, it is not clear if agreements are in place to ensure that this maintenance will take place, or if there are any plans to raise the wall in the future.

Advice to Applicant:

Environmental Permit

This development may require a permit under the Environmental Permitting (England and Wales) Regulations 2010 from the Environment Agency for any proposed works or structures, within 16m of a sea defence. This was formerly called a Flood Defence Consent. Some activities are also now excluded or exempt. A permit is separate to and in addition to any planning permission granted. Further details and guidance are available on the GOV.UK web

Environmental Health Manager, Community Group

We can advise that I have no adverse comments to make with regard to the proposed demolition of existing structures and the replacement of these with a substantial number of static caravans, etc for holiday accommodation.

I can advise however that Jonathan Driver of this office, will in all likelihood have comment to make with regard to possible pollution and contamination issues (specific sources identified which may need further appraisal)

Environmental Health Manager, Community Group

No Objection subject to conditions: I have read the supporting documentation for this application, and have reviewed the site context against the available spatial information & other anecdotal information resources. The planning history is of particular interest, and is considered to be indicative of the potential presence of a number of contaminants at the site - potentially representing both point sources, and widespread contamination.

It is understood from historic mapping that the holiday park was likely to have been constructed in 1932 (one map issue shows the site, the other not - indicating a narrow date range). Since this date, a significant number of planning applications have been submitted / approved. I have not been able to undertake a comprehensive search of our archives to determine locations of features of interest, but the points below briefly pick out relevant applications;

conversion of air raid shelters to sanitary blocks. Assume above ground - potential for below ground elements, potential for partial fill for purposes of level amendment - Asbestos Containing Materials (ACM) & other general Made Ground remains possibility (Clinker etc.)

4756/1 - store & swimming pool infiltration plant house. The term "Infiltration" in this context is ambiguous, unclear whether representing disposal of pool water to land (inc. chlorine & other chemical agents - e.g. flocculants, often metals), or simply to house 'filtration plant'.

„h 14643/4 - demolition of existing wooden chalets. Indicative of the structure of original chalets at the site. Likely finished in lead paint, likely that regular maintenance would have been undertaken during the period of use - this often leads to significant lead concentrations around the footprint of such structures. (also see 14643/8, .../17, 7456/7, 22567/9)

14643/09 - petrol filling station & wash-down area. Whether tanks were above or below ground, this use represents a localised hydrocarbon contamination risk through tank, leakage, spillage from filling, and from leakage from associated interceptor chambers or distribution pipework. tanks may represent a structural hazard if not currently in use, and not 'made safe' (tanks at elevated risk of corrosion when largely empty)

14643 - boathouse adjacent to the lake. Depending on type of craft housed - potential for contamination from fuel / engine maintenance, and for all craft (given dates), physical maintenance & repair of hull / internals - paint, lead, resins, oils, varnishes & solvents (localised)

14643/27 & ...31 - ...boiler house, tank room. Oils/solid fuel & combustion residues.
22467/1 - new flue to kitchen boiler house. May represent different boiler house than those mentioned in 14643/27 & .../31

22567/7 - ...stillroom. This term can be used to reference a number of different uses -

given the date, unlikely to carry the same meaning as the historic - but could in theory refer to activity where potentially contaminating materials would have been stored and used, especially is used as a distillery, or in the local production of soaps and cosmetics for use at the site.

87/22567/34 - 2" narrow gauge railway. Given the year, not likely to represent a significant risk (e.g. may be electric); however there remains some risk of contamination impact similar to those for the boathouse - fuel, oils/lubes/metals/solvents (maintenance), especially where the locomotive and carriages were housed. Beyond the above, there are numerous applications relating to the demolition, construction, and alteration of chalets and service buildings at the site. Simply given the number of phases of work, and the respective construction dates, there is a substantial risk of asbestos containing materials being present within the buildings demolished to date. Similarly, given the coastal location, and number of wooden structures, lead is likely to have been released to the site, and could be significantly elevated within made ground consisting of construction & demolition wastes (disposal to land would not have been uncommon practice during some of the periods of activity, whether as used in construction, or for the purpose of disposal. I recognise that the exposure profile of a holiday park is less sensitive than residential, however whilst the frequency &/period of exposure may be low, young children can be expected to be present & to have relatively high exposure risk when on site (due to focus on play & recreation).

The application represents a substantial redevelopment, and it is therefore considered both appropriate and proportionate to require that these risks are quantified, and if necessary, appropriately addressed. Given the scale of the site, the desk based elements are considered to be especially important, and should aim to draw upon information resources beyond the standard environmental search providers (i.e. should draw upon site specific records). I also note that consent no. 518 refers to conversion of air raid shelters. These are likely to have been necessary as the site lies on the main Luftwaffe flightpath to the Royal Navy Dockyards, and Fort Cumberland at Portsmouth. Further, a number of bombing decoys were known to be located within Langstone harbour, the closest recorded being less than 2km due east, but mobile decoys were also likely to have been utilised at the island. For this reason, Hayling island received a relatively heavy bombardment in comparison to sites further inland.

Whilst it appears that at least part of the site was in use before the war (reducing the risk of UXB being dropped at the site without being recorded), it's presence does remain a possibility. I would recommend that the desk-based assessment of the site consider UXO/UXB.

I have no objection to the proposals, subject to conditions to secure the appropriate assessment of contamination risk for the protection of future occupants, and sensitive environmental receptors (e.g. Chichester Harbour SSSI / SPA / SAC / RAMSAR).

Mr P Marshall, Development Engineer

At pre planning stage I expressed concerns with regard to traffic generation and these have been satisfactorily addressed in paragraph 3.11 and 3.12 of the developer's Planning Statement.

Paragraph 1.3 of the Planning Statement makes the point that modern holiday customers do not stay in a holiday village but use local facilities including pubs and restaurant. I would like a commitment from the owners of the site to encourage their residents to use other means of travel other than the motor car during their stay by means of a document agreed with the Planning Authority. This document could include onsite cycle hire and a dedicated information displaying taxi and bus information is

along with traffic and weather information.

Planning Policy, PPUD

The Core Strategy vision recognises that Hayling Island continues to be at the heart of the important tourism industry and recreational activity in the borough. Hayling Island is separated from the mainland by Chichester and Langstone Harbours and is surrounded by a variety of national and international designations which contribute to the attractiveness of its environment. However, the tourism of Hayling Island is very seasonal, and the Core Strategy policies support the retention and enhancement of tourism and tourist facilities accordingly. These are considered in detail below. The site is located outside of the urban area boundary as defined by Policies CS17 and AL2.

Policy CS17 seeks to concentrate development within the urban areas of the borough, and priorities development on previously developed land provided it is within the urban area. The policy states that development in the non-urban areas will only be permitted if it is consistent with the policies for the countryside set out in national policy. Though the site is within the non-urban area, the NPPF encourages the effective use of land by reusing land that has been previously developed provided that it is not of high environmental value.

Paragraph 28 of the NPPF also indicates that 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 should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations. In this respect, Policy CS5 states that appropriate development proposals that safeguard and improve existing tourist facilities, hotels, holiday centres and caravan parks will be supported. As the proposals retain the site for tourism purposes and would result in improved tourism accommodation/facilities, the proposals accord with Policies CS5 and DM3.

As the proposals involve the use of land for the siting of holiday caravans, it is also of relevance to consider Policy DM4. The purpose of the policy is to ensure that static holiday caravans do not become permanent residential accommodation owing to their location away from local services or owing to their form and setting. The policy therefore only supports caravan development where it is to be used for holiday purposes and has a limited period of occupancy for a maximum of ten months per calendar year.

Whilst the caravans are unlikely to become used for permanent accommodation, the applicant's agent suggests that such a restriction is unjustified. Paragraphs 5.26-27 of the Planning Statement refer to the "Tourism Planning Guidance" on the Visit Britain website which does not form part of the National Planning Practice Guidance. The agent suggests that the imposition of a condition would deny the applicant's "existing right to provide holiday accommodation during the winter months and thereby undermine the viability of the project and discourage the modernisation of the site." However, there appears to be an absence of any detail regarding the viability of the proposals or the business plan for the modernisation of the site.

Additionally, the site is located adjacent to Chichester Harbour, an area recognised for its wildlife interests and susceptibility to flood risk particularly during the winter months. Paragraph 10.16 of the supporting text indicates "where a limited occupancy condition or agreement is entered into, it is expected that the vacant months will be during the winter (between November and February) when protected birds and wildlife are most

susceptible to noise and activity. The potential impacts on the landscape and nature conservation designations and the flood risk areas around the coastal zone will be particularly important in determining proposals related to this policy.”

The site is adjacent to the AONB, SPA, SAC, SSSI and SPA, and therefore any development should avoid any adverse impacts on these designations. The AONB also abuts the site to the north, east and west, and the design of any development should be sensitive to this designation. The Council’s Ecologist and Landscape Team have been consulted on these matters accordingly, and may be able to offer further advice on whether it is appropriate to limit occupancy accordingly.

The site is located within Flood Zone 3 and whilst there will be no overall change in vulnerability classification, the proposals will need to comply with national planning practice guidance. Hampshire County Council as the Lead Local Flood Authority and the Environment Agency have been consulted in this regard.

The proposal will need to comply with all aspects of policies CS20, DM11 and DM12. The Development Engineer and Hampshire County Council as Highways Authority have been consulted in this regard.

Recommendation

Though the site is located outside the urban area, the proposals would involve the redevelopment of a large brownfield site, and retain the site in tourism uses and deliver improved facilities. Furthermore, the development proposals would make a positive contribution to the importance of tourism industry to the island, and generally support the Core Strategy vision and objectives in contributing to the retention and enhancement of tourism provision on the island. On this basis, there is no objection in principle provided it can be demonstrated that the development proposals are acceptable in environmental terms.

Hampshire Highways

This application would be dealt with by the Local Authority own Highway Engineer

Hampshire Wildlife Trust, Beechcroft House

Thank you for consulting the Wildlife Trust with regard to the submission of additional information by the applicant in support of the development proposals. We note that the information provided seeks to address issues raised by the Havant Borough Council landscape officers and Chichester Harbour Conservancy in relation to the AONB. Natural England (NE), Havant Borough Council, via HCC Ecology and Chichester Harbour Conservancy (CHC) comments in relation ecological issues are responded to via an amended HRA Stage 1 Screening Report. Given that issues we raised relating to the adjacent designated Natura 2000 sites are broadly similar to those raised by NE, HCC Ecology and CHC, there is sufficient information for us to comment further. Otherwise, our comments relating to protected species and habitats appear to have been ignored and no additional information is provided, provided; therefore we are unable to remove our objection.

Designated Sites

With regard to potential impacts on the nearby designated sites we are pleased to see the detailed work that has been carried out in order to address concerns raised by the statutory and non-statutory consultees. However, whilst the desktop study is very detailed it is important to consider the resolution of the background data used and in particular the gaps in it. It is for this reason that the Solent Wader and Brent Goose

Strategy is currently being revised and intensive survey work being carried out in order to update the strategy.

Supporting text (paragraph 9.21) to Policy DM23 (Sites for Brent Geese and waders) of Havant Borough Council's Local Plan states that 'Where data on sites of 'important' or 'uncertain' value is limited or out of date, site surveys should be undertaken to determine level of importance. It goes on to say that 'The authority recommends that the survey methodology set out in the Solent Wader and Brent Geese Strategy (2010) is followed. Appropriate methodologies should be approved by a professional ecologist and prepared in conjunction with Natural England. For surveys to be considered valid, reasonable measures should be taken not to reduce the sites suitability for Brent Geese and waders during the survey period. In all cases [our emphasis], three consecutive years of recent survey data should ideally be carried out across the overwintering seasons and a record of any sightings on or adjacent to the application site will be required.'

Whilst the applicant's ecologist has carried out a detailed desktop study, the level of survey work carried out is significantly less than what would normally be required, with survey visits on 8th and 14th February 2016 and a further observation during a planning visit on 16th February 2017. Based on the desktop study and field surveys the site is assessed as being of negligible importance for brent geese and waders. It appears that this assessment is based on the fact that only a small number of geese were recorded using the site, nonetheless they were recorded on both survey dates and also during a planning visit, therefore on all three dates that the site was visited. Had further surveys been carried out, it is probable that more usage of the site would have been recorded, and this would likely demonstrate that the site is actually more important for geese than is currently being suggested as such the potential impacts could be greater than current being suggested in the HRA. We note that data included in the interim update of the SWBGS, which was recently published, holds a record for 36 and 103 brent geese in December 2015 and January 2016, respectively. There is also a December 2015 record of 4 oystercatchers feeding on the site.

During surveys across the eastern Solent over the winter of 2016/17 as part of the SWBGS surveys, geese were regularly recorded using fields where there was standing fresh water, and where puddles had formed after heavy rain these were quickly sought out and used by geese for drinking and bathing. It therefore would appear that the presence of freshwater in close proximity to a feeding resource maybe an important component. As such it may be the case that geese do not visit a site in large numbers, but visit it regularly in smaller numbers in order to drink and bathe, and therefore an increase in disturbance could have a significant impact,; this has not been considered. We acknowledge that a mutually agreeable solution was identified by the key stakeholders attending the planning meeting, but question that an assessment that impacts associated with recreational disturbance will be negligible, can be made with any certainty based on two surveys. We therefore recommend that further surveys are carried out across a winter period in order to inform a robust mitigation strategy that can be delivered with certainty.

We support measures aimed at informing visitors to the holiday camp of the special qualities of the area, and these could be enhanced by the owners inviting stakeholders, such as the Solent Recreation Mitigation Partnership (SRMP) to provide talks/presentations to guests visiting the camp during the winter months. In addition, a contribution could be made to the SRMP since this an additional disturbance which falls outside of a new residential development.

Landscape Team

No landscape objection to this application in principle. However we have some concerns with the initial design which need to be addressed;

- The proposed increase of caravan density causes a significant loss of open space. There is concern this will place unacceptable pressure on the ecological value of the existing SINC (which is identified as amenity grassland within the submitted plans). It would be preferable for additional areas of connected open space to be introduced through the site layout for the benefit of the site users and as linking habitat.

- The proximity of caravans close to the site boundary will have an adverse effect on the local landscape character. This is of particular concern given the proximity of Chichester Harbour AONB. It would be preferable to reduce caravans where there are key vistas on to the AONB.

- The LVIA does not sufficiently demonstrate an appraisal of the proposed development – the assessment relies on photos of the baseline only. Given the demonstrated loss of open space, we do not agree with the magnitude of change to the landscape character, being judged negligible. The mitigation requirements are not sufficiently demonstrated or explained.

- Further details of species, size or density of planting will be required. A continuous woodland screening belt to the east (separating the caravan park and the adjacent SINC) is not deemed appropriate to the existing landscape character- it would be more appropriate to consider a more natural layout/form. The indicated high number of specimen trees through the site layout are not deemed appropriate – It would be preferable to focus on smaller number of quality, larger legacy trees within an appropriate allowance of open space.

- We observed a number of existing good quality trees, that have been well maintained. It will be important that these are sufficiently protected during the construction process and by sufficient provision of associated open space to ensure future site activity does not place pressure to fell or excessively prune these trees.

- We note the concerns raised in regard to ecology and would recommend that a landscape management plan is to be provided, which demonstrates how the different landscape habitats will be protected and enhanced - we suggest this could be broadened to an education strategy with information boards placed on site. It may be appropriate for defined footpaths to be created within the SINC to manage footfall and protect vulnerable areas.

Additionally we recommend the following conditions:

- A landscape strategy to afford more detail regarding hard and soft landscape proposals and how these fit within the local landscape character. Given the site proximity to Chichester harbour AONB, we suggest there is an emphasis on native plant species and that any proposed tree planting is carefully specified and placed to contribute viable legacy specimens for the future.

- A landscape management plan for the whole site that identifies the differing habitats and landscape types (within and adjoining the site)

- To help mitigate the visual impact of the proposals, the submission of any proposed materials (colour and specification) will be particularly important.

Response to amended plans.

The revised plans have largely addressed the concerns that were raised, however suitable conditions are required in order to ensure the development provides an adequate landscaping framework with regard to implementation and maintenance

Local Lead Flood Authority HCC

We have reviewed the following documents in relation the drainage strategy of the

proposed development.

Flood Risk Assessment (including appendices)

The FRA document fails to propose details of a drainage strategy and no illustration of such a strategy has been provided. In addition, the FRA report would not provide key information of the site and proposed development in order to be able to provide a valid response. Until the provision of a surface water strategy and required information to the Lead Local Flood Authority we cannot comment on the application submitted.

We recommend the applicant to consider the following elements:

The existing flow paths and drainage regime of the existing site and likely areas that might be affected if the existing drainage regime fails (i.e. tidal lock occurrence)

Total permeable and impermeable area before and after development crest level of flood defence along the proposed site. Finished floor level has been based on the maximum surface water flooding following the tidal lock of outfall(s). No details of the calculations have been provided. More importantly, where the tidal flooding with sewer implications is the main flood risk, how could it be justified to use the flood level associated with the surface water flooding as a base for setting finished floor level?

When taking into account sea level rise associated with 100 years of climate change the flood depth along the evacuation route could be up to 2.42m in a 1 in 200-year (plus climate change) flood. No Safe haven has been considered on the site. Given that some flooding events (breaching or overtopping) might occur in a short period of time without sufficient time for proper alerts, risk to people and assets (e.g. cars) would be high if there is no safe access/egress route and safe havens on the proposed site

Existing and proposed run-off rate calculations should be provided, along with evidence that these calculations have been completed according to a suitable method (e.g. IH124 or FEH available from UK Sustainable Drainage: Guidance and Tools). These calculations should demonstrate that the proposed run off rate for a one in one year event and a one in one hundred year event plus climate change do not exceed the existing run-off rates

Whilst the FRA acknowledges that the holiday park are the riparian owners of the defence and recommend its maintenance regularly, it is not clear if agreements are in place to ensure that this maintenance will take place, or if there are any plans to raise the wall in the future

Evidence that exceedance flows and runoff in excess of design criteria have been considered - calculations and plans should be provided to show where above ground flooding might occur and where this would pool and flow.

Information on general maintenance regimes of the surface water management train including SuDS features, and who is going to be undertaking evidence that those maintaining the drainage system are in discussion with the developer.

Ordinary Watercourse

Where the proposals include works to an ordinary watercourse, under the Land drainage Act 1991, as amended by the Flood and Water Management Act 2010, a prior consent of the Lead Local Flood Authority is required for this work. This consent is required as a separate permission to planning.

Information on consenting can be found at the following link
<http://www3.hants.gov.uk/flooding/hampshireflooding/watercourses.htm>
It is strongly recommended that this information is reviewed before Land Drainage consent application is made.

Please note, surface water drainage proposals will need to be assessed in relation to the impacts of climate change. The appropriate allowances are detailed in the latest advice from the Environment Agency Flood risk assessments: climate change allowances. This updates previous climate change allowances to support NPPF. The proposed system should be tested for the peak rainfall intensity for the central and upper band in relation to the relevant development lifetime.

We would also expect to see a suitable allowance for urban creep, this factor reflects the future predicted increase of urban development, and with it, the increase of the impervious area. An allowance of 10% on impermeable areas is suitable in relation to confirming that the proposed system is acceptable.

Where the proposals are connecting to an existing drainage system it is likely that the authorities responsible for maintaining those systems will have their own design requirements. These requirements will need to be reviewed and agreed as part of any surface water drainage scheme.

Please note that the mechanism for securing long-term maintenance will need to be considered and agreed between the applicant and the Local Planning Authority. This may involve discussions with those adopting and/or maintaining the proposed systems, which could include the Highway Authority, Planning Authority, Parish Councils, Water Companies and private management companies.

Economic Development - Commercial and Housing

Support - This proposal will upgrade the tourism offer on the island thus benefiting the local economy

Natural England Government Team

NO OBJECTION - SUBJECT TO APPROPRIATE MITIGATION BEING SECURED

The application site is adjacent to Chichester and Langstone Harbour Ramsar, Chichester and Langstone Harbour SPA and Solent Maritime SAC. The application site includes an area identified as 'important' in the Solent Waders and Brent Goose Strategy (2010 update) (site H43) and is used as a high tide roost by Brent Geese and waders, which are qualifying features of the Chichester and Langstone Harbour SPA. As submitted the application would have an adverse effect on the integrity of the qualifying features of the Chichester and Langstone Harbour Special Protection Area. In order to mitigate these adverse effects and make the development acceptable, the following mitigation measures are required:

- 1) Prior to the commencement of the development, a Construction Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority. The Construction Environmental Management Plan shall identify the steps and procedures that will avoid or mitigate impacts of the designated sites and their qualifying features. Once approved, the CEMP shall be adhered to at all times, unless otherwise first agreed in writing with the Local Planning Authority. Further advice is included below.
- 2) An ornithological watching brief shall be undertaken for the duration of the demolition and construction works carried out during the sensitive period (01 October to 31 March).
- 3) No dogs shall be permitted on the Mill Rythe Site of Nature Conservation Interest

(SINC) / pitch and putt golf course from 01 October to 31 March inclusive.

4) Access from the Holiday Village to the sea wall shall be closed from 01 October to 31 March inclusive.

Reason: To ensure the disturbance to birds is minimised during the construction and operation of the Mill Hythe Holiday Village.

We advise that an appropriate planning condition or obligation is attached to any planning permission to secure these measures.

Further advice on mitigation

In particular, the CEMP will include a methodology for the demolition of the existing holiday chalets and the installation of the mixed accommodation and associated dining and leisure facilities. This should include details of:

- The access route of construction vehicles to and from the site.
- Location of construction compound and car parking.
- Storage and location of equipment and materials.
- Potential for run-off from the site and waste disposal resulting from site preparation, groundwork and the construction phase of the development and appropriate mitigation measures.
- Measures to minimise creation and impact of dust.
- Consideration of how certain activities will be limited in time, location or noise level to minimise the risk of disturbance to SPA birds (i.e. October to March inclusive). Details of noise monitoring of the construction and demolition work at sensitive locations.
- Any percussive piling or works with heavy machinery (i.e. plant resulting in a noise level in excess of 69dbAmax jV measured at the sensitive receptor which is the nearest point of the SPA or SPA supporting habitat jV high tide roost sites) should not be undertaken during the bird overwintering period (i.e. October to March inclusive).
- Measures to visually screen the construction works from the sensitive areas.
- Details of the ornithological watching brief necessary for any demolition and construction works during October to March.
- During construction, access onto the sea wall from the development site should be restricted.

Other advice

It is noted that the eastern section of the site is designated as the Mill Rytte Holiday Village SINC and will be retained in situ and subject to management to increase its value as a nature conservation resource. Natural England welcomes this approach. Natural England welcomes the provision of ecological information to guests and the provision of interpretation boards around the site. Ecological information should be verified by a suitably qualified ecologist and should include recommendations to minimise disturbance; including keeping dogs on leads in sensitive areas and at sensitive times, and preventing access to the intertidal area during the winter months and details of the sensitive habitats and species around the site.

It would be useful to review how much the pitch and putt golf course is currently used during the winter months and whether it is possible to prevent access between November and March. As the site looks quite wet, the restriction of access may help prevent damage to the pitch and putt course during these winter months. This approach would be welcomed by Natural England.

Open Space Society

No response

Public Spaces

No response

Royal Society for the Protection of Birds

No response

Southern Water

The results of an initial desk top study indicates that Southern Water currently cannot accommodate the needs of this application without the development providing additional local infrastructure. The proposed development would increase flows into the wastewater sewerage system and as a result increase the risk of flooding in and around the existing area, contrary to paragraph 109 of the National Planning Policy Framework. Alternatively, the developer can discharge foul flow no greater than existing levels if proven to be connected and it is ensured that there is no overall increase in flows into the foul system.

You will be required to provide a topographical site survey and/or a CCTV survey showing the existing connection points, pipe sizes, gradients and calculations confirming the proposed foul flow will be no greater than the existing contributing flows. Should the Local Planning Authority be minded to approve the application, Southern Water would like the following condition to be attached to any permission.

“Development shall not commence until a drainage strategy detailing the proposed means of foul disposal and a implementation timetable, has been submitted to and approved in writing by, the local planning authority in consultation with the sewerage undertaker. The development shall be carried out in accordance with the approved scheme and timetable.”

We suggest the following informative: ‘The applicant/developer should enter into a formal agreement with Southern Water to provide the necessary sewerage infrastructure required to service this development. The applicant/developer should contact Southern Water, Sparrowgrove House, Sparrowgrove, Otterbourne, Hampshire SO21 2SW (Tel: 0330 303 0119) or www.southernwater.co.uk’ in order to progress the required infrastructure. The planning application form makes reference to drainage using Sustainable Urban Drainage Systems (SUDS).

Under current legislation and guidance SUDS rely upon facilities which are not adoptable by sewerage undertakers. Therefore, the applicant will need to ensure that arrangements exist for the long term maintenance of the SUDS facilities. It is critical that the effectiveness of these systems is maintained in perpetuity. Good management will avoid flooding from the proposed surface water system, which may result in the inundation of the foul sewerage system.

Thus, where a SUDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should:

- Specify the responsibilities of each party for the implementation of the SUDS scheme
- Specify a timetable for implementation
- Provide a management and maintenance plan for the lifetime of the development.

This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

The application contains a proposal for a swimming pool for commercial/public use. If the pool produces filter backwash water this would need to be discharged to the public foul sewer. The rate and times of discharge of this water to the sewer, and of the contents of the pool, if these need to be drained to the sewer, would have to be agreed with Southern Water. The applicant is advised to discuss the matter further with

Southern Water's Trade Effluent Inspectors. Please see <https://www.southernwater.co.uk/BusinessCustomers/wasteServices/tradeEffluent/> for further information.

The applicant should be advised that a wastewater grease trap should be provided on the kitchen waste pipe or drain installed and maintained by the owner or operator of the premises.

Tourism South East

No response

Traffic Management, HBC

No details of provision for parking has been submitted with the application
Adequate parking provision will need to be provided for this development

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: 50

Number of site notices: 3.

Statutory advertisement: 23/12/2016

Number of representations received: 8

Comment	Officer Comment
1. Concerns regarding traffic movement , due to the increased volumes of residents at the Holiday village, there is already congestion during school hours and the increased risk to children accessing the school with vehicular movement on and of the Holiday village during school terms. 2. Increased vehicular traffic during peak holiday periods. On / off site and onto Havant road junction.	See section 7.1 (viii)
3. Noise and light pollution levels from the development.	See section 7.1 (iii)
4. Issues with access and the state of the current road surface as this is not a public highway.	The existing access road is considered acceptable and the development would be similar in terms of numbers
5. Security concerns to the rear of the properties on Kings Roads adjacent to	The number of units proposed on the site is the same as the existing situation

the access road.	
1 The applicant has a number of other facilities and the general approach is to offer all the units (mobile homes or chalets) for sale (with a ground rent and service charge added.) Normally, these are available for sub-letting and the company will handle this for the owner. This is basically like a timeshare business. Not too much of a problem there until you add the applicant's request for 12-month occupancy. They say that a requirement for the owner to present a Local Tax bill to prove their main residence is elsewhere is a control to prevent permanent residence but this is only on the owner - it does not legislate for other family members, friends or sub-let tenants - so permanent residency is possible and likely to happen. The 10-month residency limit which applies to the other sites must not be rescinded.	See section 7.1 (ii)
2 The Harbour Conservancy are against the development for visual, light and sound pollution, and its proximity to the Harbour.	See section 7.1 (iii)
3 There is talk (not verified - more lack of detail and specificity) that they are intending to look at a SUDS system (you may well ask!) It's basically a private foul drainage system. These systems are not approved by the Harbour Conservancy or the Environment Agency as they do not guarantee long-term sustainability, and in the event of failure will discharge into Chichester Harbour. I believe that these questions at least need to be answered before the residents of Hayling Island could reasonably be asked to comment on the proposal.	See section 7.1 (vi)

The plans submitted are over-intensive exploitation of a special site that like others on Hayling Island requires protection. Protection that seems to be provided less and less by Havant Borough Council in its attempt to appease Central Government. When will our elected officers regain control over the salaried officers of this borough and start delivering planning controls that also reflect the hopes and needs of existing council tax paying residents? What impact will 204 caravans with their own transport have on the existing congested main Havant Road? Historically coaches have delivered holiday makers to Mill Rythe on a weekly basis. We will need to instead live with 204 (potentially far more, even double that number) additional cars on the Roads of Hayling Island. I would encourage Havant Borough Council to reject this application and start protecting sensitive sites around the Island. How does this application move forward given the oft quoted but lesser spotted infrastructure review?	See sections 7.1 (i)(ii)(iii) See section 7.1 (viii)

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 on tourism facilities
- (iii) Impact upon the character and appearance of the area and on the setting of the adjacent AONB
- (iv) Impact upon residential amenity
- (v) Flood risk
- (vi) Drainage
- (vii) Impact of protected species
- (viii) Impact on highways
- (ix) Impact on archaeology
- (i) Principle of development

Mill Rythe Holiday Village is an established holiday centre. Policy CS5 of the Core Strategy indicates that the council will protect all existing tourist facilities and accommodation that are fit for purpose, whilst recognising the need for flexibility in order to respond to an evolving tourist and day visitor market. The Core Strategy vision recognises that Hayling Island continues to be at the heart of the important tourism industry and recreational activity in the borough. Hayling Island is separated from the mainland by Chichester and Langstone Harbours and is surrounded by a variety of national and international designations which contribute to the attractiveness of its environment.

However, the tourism of Hayling Island is very seasonal, and the Core Strategy policies support the retention and enhancement of tourism and tourist facilities accordingly. These are considered in detail below. The site is located outside of the urban area boundary as defined by Policies CS17 and AL2. Policy CS17 seeks to concentrate development within the urban areas of the borough, and prioritises development on previously developed land provided it is within the urban area. The policy states that development in the non-urban areas will only be permitted if it is consistent with the policies for the countryside set out in national policy. Though the site is within the non-urban area, the NPPF encourages the effective use of land by reusing land that has been previously developed provided that it is not of high environmental value.

Paragraph 28 of the NPPF also indicates that 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 should include supporting the provision and expansion of existing tourist and visitor facilities in appropriate locations. In this respect, Policy CS5 states that appropriate development proposals that safeguard and improve existing tourist facilities, hotels, holiday centres and caravan parks will be supported. The applicant Away Resorts purchased Mill Rythe Holiday Village out of administration and continue to make the site a more viable holiday business. The Holiday Village had become unviable due to the number of staff required to run the extensive entertainment and leisure facilities at the village, and the quality of accommodation is now no longer fit for purpose in the current tourism market, having been based on the 'holiday camp' experience of the 1950's and 1960's. As such the applicant has undertaken to reorganising the site to provide more and more attractive, viable and lower maintenance accommodation, in combination with enhanced leisure facilities, in order to make the site attractive and desirable holiday environment for the current leisure market. Therefore the proposals would retain the site for tourism purposes and would result in improved tourism accommodation/facilities, which would have a positive economic benefit to the wider economy of the district through attracting more visitors to the area and therefore the proposals accord with Policies CS5 and DM3. This positive impact needs to be balanced against the impacts on the wider area, which is sensitive given its position in relation to the AONB and other designations, this is considered in detail below.

(ii) Impact on tourism facilities

As the proposals involves the use of land for the siting of holiday caravans, it is also of relevance to consider Policy DM4. The purpose of the policy is to ensure that static holiday caravans do not become permanent residential accommodation owing to their location away from local services or owing to their form and setting. The policy therefore only supports caravan development where it is to be used for holiday purposes and has a limited period of occupancy for a maximum of ten months per

calendar year. The applicant has raised concerns that by applying a ten month occupancy condition this would adversely effect the viability of the holiday village, although no actual financial information is submitted to support this concern. However the agent for this application has submitted that if suitable holiday parks in the District are not allowed to extend their season to meet customer demand in this way, those customers will take their holidays in those holiday locations that do allow holiday use during the winter period, putting the district at a competitive disadvantage.

Furthermore the agent has also identified a number of appeal decisions regarding 12 month occupancy, which have been allowed given the specific circumstances for each site. It is therefore considered necessary to assess this information given the changing trends within the tourism sector, against the reasons why the LPA would seek to apply such a restriction, which as outlined above, is to prevent the caravans becoming permanent residential accommodation. The former Good Practice Guide on Planning for Tourism (GPGPT), now withdrawn and replaced by the NPPF, which provides similar advice, recommended conditions to allow all year holiday use and prevent residential use of holiday caravans, subject to appropriate controls. An appeal at Highfield Grange Holiday Park in Tendring District Council (Planning Inspectorate Ref: APP/P1560/A/12/2182590) was allowed on 25 February 2013 for use of the caravan site all year round.

The former Guide, records that tourism is increasingly a year-round activity and that such a spread of demand for self catering accommodation is advantageous to local economies but recognises that occupancy conditions are reasonable to preclude permanent residential use. It is therefore considered that given the evolving nature of the tourism market flexibility is required to respond to an evolving tourist and day visitor market. As such it is considered that in this instance given the background to the Holiday Village, that subject to suitable conditions, which would limit the number of caravans permitted on the site and prohibiting their permanent occupancy, that this development would therefore not result in the creation of permanent residential dwellings and therefore address the reasons for such controls in the policy.

The supporting text of policy DM4 also justifies the restriction on occupancy by balancing the impact on sensitive areas such as on the AONB and achieving high quality living accommodation, this is considered in detail below.

(iii) Impact upon the character and appearance of the area and on the setting of the adjacent AONB

The existing built area of the holiday village is immediately adjacent to the Chichester Harbour Area of Outstanding Natural Beauty (AONB). The eastern area of the site which is currently a mini golf course is within the AONB. The majority of the existing buildings on the site are plain and utilitarian with no aesthetic or architectural merit, in which respect they are typical of many holiday style buildings of that time. The site is largely screened from the surrounding landscape by the mature boundaries around the site. However some of the buildings are visible from the public footpath, which is located to the north of the site on the opposite side of Mill Rythe estuary. The views from this point are mainly the top of the existing facilities buildings and two storey chalet buildings, any buildings that are single storey are largely screened by the extensive sea wall on the northern boundary. However, the complex is not considered to be unacceptably prominent, being set against the backdrop of the mature tree belts on the southern boundary of the site, and the wider sporadic development to the west, which consists of both residential development and Mill Rythe Junior and Primary

Schools.

This scheme has been amended following concerns that the development would have adverse impact on the landscape. The amendments, particularly with regard to the revised landscaping and layout of caravans, which proposes additional footpaths which would create a more cohesive flow around the park, are considered to be an improvement. These enhancements are provided by having less manicured and formal appearance of the proposed landscaping, resulting in a more natural arrangement in terms of layout, rather than providing the original regimented form of landscaping, which did not respect the natural field boundaries around the area. Furthermore the removal of 1 caravan and subsequent amended layout has allowed the additional areas of open space to be created to give users designated areas for informal play.

Concerns have been raised from the Chichester Harbour Conservancy regarding the impact of the development on the AONB. Particular concern was raised regarding the spread of development across the site, together with concern about the proposed materials to be used providing significant glare to the surrounding area. The development is a reconfiguration to an existing holiday village and not a completely new development, and will be largely screened by planting; as the additional planting matures existing buildings which are currently perceptible from the adjacent AONB will become largely screened. The screen planting within and around the site as it matures would improve landscape character over time. The geographical extent over which the landscape effects would be visible would be at the level of the site and the immediate setting of the site.

To the north of the site, from the Public Right of Way, the changes would be glimpsed, due to the type and limited heights of the development. At this point the use of materials on the development is key, to ensure that the colour of materials is suitable. Chichester Harbour AONB planning guidelines sets out suitable colours to be used which are considered acceptable in the local rural context. The applicant has agreed to the use of the approved colours within this document, and therefore a condition is proposed in order to control the colours of the caravans, associated decking areas and any other paraphernalia involved in this development.

Whilst it is acknowledged that the landscape impact is better in the longer term, there are still concerns regarding its wider visual impact from the north from the Chichester Harbour AONB. However given the existing built form, more sensitive design, layout and scale, retention and enhancement of an existing tourism use and its subsequent contribution towards the wider economy of the district, it is considered that on balance the landscape impact, whilst altered, is not so detrimental when weighed up against the other elements outlined in the report as to warrant a refusal of this application.

It is acknowledged that there is a need for control over night sky pollution and that no lighting should be there unless necessary and justified accordingly. A condition would control external lighting on the site and would be subject to the agreement of the LPA.

(iv) Impact upon residential amenity

Given the layout and distances to neighbouring properties it is not considered that the development would have a significant adverse impact on the amenities of neighbouring properties.

(v) Flood Risk

The whole of the holiday village including the application site falls within Flood Zone 3. The applicant's agents advise that there is no other land in the holiday village which would cater for this development, and it would not be appropriate to seek land outside the holiday village for such use as this would leave users separated from the facilities.

To justify the use of this land the applicant's agent points out that:

- i) the proposal will safeguard the future of the holiday village and therefore provides a wider sustainability benefit;
- ii) it is on previously developed land, being part of the holiday village; and
- iii) the development can be made safe.

The vulnerability and flood risk to the site and surrounding area would not increase as a result of the proposed development as the number of units will not increase. As the proposed development comprises the same number of holiday units, the proposed development can be considered as 'like for like' and so there is no increase in vulnerability to the site.

The submitted flood risk assessment (FRA) confirms that the present day flood risk from extreme sea levels to the site is 3.3mAOD, rising to 4.5mAOD in 2115. The application site is anticipated to flood to a level of 0.4 metres which would allow for emergency vehicles to access the site in the event of a flood. The internal floor levels of the caravans would be 0.8 metres above ground level and thus above the anticipated level of flood water. The existing chalets by comparison are more vulnerable to flooding due to their lower floor levels. It should be noted that any flooding is anticipated to affect only a small part of the application site within the next 25 years. The owners would introduce a flood warning and evacuation plan, which would apply equally to both those using the static caravans as well as those in the chalets, this requirement is covered by appropriate conditions, which is an approach which is supported by both the Environment Agency and Eastern Solent Coastal Partnership who raise no objection to this application.

(vi) Drainage

As indicated above as the proposed development comprises the same number of holiday units, the proposed development can be considered as 'like for like' and so there is no increase in vulnerability to the site. As such no more people are at risk of flooding than are currently able to use the site, therefore discharge foul flow would be no greater than existing levels and this is therefore a significant fall back position. Southern Water and the Local Lead Flood Authority (LLFA), have requested that details are secured through conditions regarding the a drainage strategy. These details would include the proposed means of foul disposal and a implementation timetable. Furthermore details regarding Sustainable Urban Drainage Systems (SUDS) are required, this would specify the responsibilities of each party for the implementation of the SUDS scheme and would include details for implementation, management and maintenance plan for the lifetime of the development and any other arrangements to secure the operation of the scheme throughout its lifetime. It is considered that in this instance the imposition of relevant, reasonable and enforceable conditions to deal with the drainage matters is an acceptable approach, given that the development is a 'like for like' replacement, this is also an approach which has been agreed with the agent.

(vii) Impact on ecology

The application is now accompanied by a Habitats Regulations Assessment Screening Report Revision B (Middlemarch, March 2017) which provides further details on the

status of bird species associated with the adjacent internationally-designated sites.

Impacts to European designated sites

Given the proximity of SPA features (whether the SPA proper to the north or the surrounding supporting habitat) there is clearly potential for impacts arising from both the demolition/construction phase and the operational phase. The proposed works would be relatively limited in terms of construction noise and it is not expected that significant disturbance would occur. There is still potential for disturbance (this site is after all relatively quiet throughout much of winter) to result in impacts and this would need to be monitored during 'construction': novel noise levels in excess of c.68-70db have been proven to result in responses from bird species depending on distance to noise source and the category of noise itself. As such a Construction Environment Management Plan (CEMP) is required, which includes details which proposes measures for minimising noise disturbance during the sensitive winter period, this is to be secured through an appropriate condition.

The pitch and putt site is designated a Site of Importance for Nature Conservation (SINC). The site is known to be used by brent geese in reasonable numbers and is listed as an 'important' site for brent geese in the latest Solent Water Brent Geese Strategy. The evidence for the SINC highlights the potential issue of recreational disturbance to bird species. With minimal open/informal greenspace available (either within the Holiday Village or on the restricted length of seawall to the north) there is an obvious risk of occupants spilling out onto the SINC and disturbing any birds. The existing Holiday Village is, not usually over-occupied during the week (it may be more so at weekends, even in winter) but the proposed refurbishment would be likely to substantially increase the site's attractiveness to visitors throughout the year: the area is attractive even in winter. With minimal informal greenspace within the site itself, the obvious 'spill-out' area is the SINC. The efforts to provide a section of shielded informal greenspace on the western edge of the SINC are noted and the recommendation for ongoing management of the SINC for its wildlife value are welcome additions and enhancement.

The SINC currently functions as a small pitch-and-putt course and during the winter period this is not used to any great extent. As such it has been agreed that a closure of the pitch-and-putt during winter would be a reasonable option to secure the SINC for undisturbed use by geese, which would therefore address any potential for disturbance. Furthermore the Holiday Village users and local community would benefit from finding out about the SINC and how the ecological management measures proposed at the Holiday Village would help to support the nature conservation interest of the site and the surrounding area. This would be a useful way to enhance links with the local community in the surrounding area. It is considered that this is an acceptable approach, subject to appropriate conditions, and would lead to an enhancement in terms of the impact on this SPA/Ramsar supporting habitat.

As highlighted above the area is a haven for a number of protected species, with regard to impact of the development on bats appropriate surveys have been undertaken and no evidence of the presence of bats was found, although a precautionary recommendation has been made associated with the supervised removal of wooden cladding and flashing during the active period for bats.

The area of grassland within the east of the site appears suitable for supporting common reptile species and there may be potential for impacts arising from any future use of the site. This can be controlled through management proposals secured through condition, which would include measures specific to reptiles.

(viii) Impact on highways

As has been outlined in the application the development would not result in an increase in number of units on the site. As such given this position it is not considered that the development would result in significant traffic generation over and above the existing use and the development therefore is not considered to have a significant adverse impact on the safety or free flow of the highway network. The Highway Engineer has identified that modern holiday customers do not stay in a holiday village but use local facilities including pubs and restaurant. The applicant has outlined in the Planning Statement that they would encourage residents to use other means of travel other than the motor car during their stay.

(ix) Impact on archaeology

Hayling Island is particularly rich in previously recorded archaeological activity and it is entirely possible that as yet unrecorded archaeological features and/or deposits exist within the site which is located just off the high ground on the eastern coast, with evidence for Bronze Age and later medieval activity immediately to the south. The site itself has been previously used as an Army camp before being developed into the currently holiday centre. From the aerial photographic evidence held it seems clear that large areas of the site have been impacted by this 20th century development which is likely to have included some landscaping work. Although this later development is likely to have removed or heavily truncated archaeological features, it is possible however that as yet unrecorded archaeology may survive within areas of open ground, particularly in the western quarter of the site. What is required at this stage is to establish the extent to which these areas of open ground have been disturbed during 20th century development and what, if any, archaeological potential survives. Therefore while there is no indication that archaeology presents an overriding concern, it is appropriate that an assessment, recording and reporting of any archaeological deposits affected by construction be secured through a condition.

x) Contamination

It is understood from historic mapping that the holiday park was likely to have been constructed in 1932 (one map issue shows the site, the other not - indicating a narrow date range). Since this date, a significant number of planning applications have been submitted and approved.

Beyond the above, there are numerous applications relating to the demolition, construction, and alteration of chalets and service buildings at the site. Given the number of phases of work, and the respective construction dates, there is a substantial risk of asbestos containing materials being present within the buildings demolished to date. Similarly, given the coastal location, and number of wooden structures, lead is likely to have been released to the site, and could be significantly elevated within made ground consisting of construction & demolition wastes (disposal to land would not have been uncommon practice during some of the periods of activity, whether as used in construction, or for the purpose of disposal).

The application represents a substantial redevelopment, and it is therefore considered both appropriate and proportionate to require that these risks are quantified, and if necessary, appropriately addressed. Given the scale of the site, the desk based elements are considered to be especially important, and should aim to draw upon information resources beyond the standard environmental search providers (i.e. should draw upon site specific records).

It is noted that a previous consent no. 518 refers to conversion of air raid shelters.

These are likely to have been necessary as the site lies on the main Luftwaffe flightpath to the Royal Navy Dockyards, and Fort Cumberland at Portsmouth. Further, a number of bombing decoys were known to be located within Langstone harbour, the closest recorded being less than 2km due east, but mobile decoys were also likely to have been utilised at the island. For this reason, Hayling island received a relatively heavy bombardment in comparison to sites further inland.

The Environmental Health Officer has no objection to this application, subject to conditions to secure the appropriate assessment of contamination risk for the protection of future occupants, and sensitive environmental receptors (e.g. Chichester Harbour SSSI / SPA / SAC / RAMSAR).

8 **Conclusion**

It is recognised there is a balance to be taken in determining this proposal. The development would regenerate an existing outdated tourist facility, therefore revitalising the site and wider local area, and subsequently contributing to the social and economic well being of the community. In addition the development, by virtue of the amendments, would generally conserve the wider landscape character and special qualities of the adjacent AONB, and is not considered to have a significant adverse impact on neighbour amenity, highway safety or protected species. Whilst it is acknowledged that this is a large scale scheme, in a non urban location, it is a previously developed site which requires a significant level of investment to remain 'fit for purpose' in the modern holiday environment and can be justified for these reasons.

9 **RECOMMENDATION:**

That the Head of Planning be authorised to **GRANT PERMISSION** for application APP/16/01237 subject to the following conditions:

- 1 The development must be begun not later than three years beginning with the date of this permission.

Reason: To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

- 2 The development hereby permitted shall be carried out in accordance with the following approved plans:

PROPOSED SITE LAYOUT PLAN - 3877-410 REV K
HABITAT REGULATIONS ASSESSMENT: STAGE 1 SCREENING REPORT
Report No: RT-MME-123420-06-Rev C undertaken by Middlemarch
Environmental

Endoscope Bat Survey at Mill Rythe Holiday Village, Havant Road, Hayling
Island - RT-MME-124714-Rev A

Preliminary Roost Assessment by Middlemarch Environmental (Ref:
RT-MME-123420-02)

Preliminary Ecological Appraisal by Middlemarch Environmental (Ref:
RT-MME-123420-01)

Tree Survey, Arboicultural Impact Assessment, Tree Protection Plan & Heads
of Terms for the Arboicultural Method Statement by MJC Tress Services Ltd.
(Ref: MJC-16-0182)

MILL RYTHE HOLIDAY VILLAGE- LANDSCAPE PLAN -
16030-CO-LP-0-01-REV-3

Site Location and Ownership Plan by A & M (Ref: 3877-300)
 Existing Site Plan by A & M (Ref: 3877-110)
 Proposed Site Plan by A & M (Ref: 3877-410 Rev D)
 Existing Plans, Elevations and Sections as follows:
 Main Complex (3877-320 & 3877-321)
 Dover (3877-330)
 Harrow (3877-331)
 Ganton (3877-332)
 Ganton (3877-333)
 Ryde, Seaton & Solent (3877-334)
 Matlock (3877-335)
 Oxford, Nutley, Otley & Norfolk (3877-336)
 Windsor (3877-337)
 Section A-A (3877-340 Rev A)
 Existing Section B-B (3877-341 Rev A)
 Existing Section C-C (Ref: 3877-342 Rev B).
 Proposed Plans, Elevations and Sections as follows:
 Proposed Elevations Plan (3877-400)
 Main Complex Building (3877-420)
 Main Complex Building- Proposed Elevations (3877-421)
 Central Area (3877-422)
 Adventure Play (3877-423)
 Splash Play Area (3877-424)
 Adventure Golf Area (3877-425)
 Dover (3877-430)
 Harrow (3877-431)
 Ganton (3877-432)
 Tenby (3877-433)
 Ryde, Seaton & Solent (3877-434)
 Matlock (3877-435)
 Nutley, Otley and Norfolk (3877-436)
 Windsor (3877-437)
 Section A-A (3877-440 Rev A)
 Sections B-B (3877-441 Rev A)
 Section C-C (3877-442 Rev A)
 Design & Access Statement by A & M (Ref: 3877, Issue 1)
 Landscape and Visual Impact Assessment by EBLA (Ref: 16030)
 Flood Risk Assessment and Outline Drainage Strategy by H20K (Ref: J-10847)
 Further information Flood Risk Assessment and Surface Water Drainage Strategy J-10847-01-HS

Reason: - To ensure provision of a satisfactory development.

- 3 The holiday caravans and chalets shall be occupied for holiday purposes only and shall not be occupied as a person's sole or main place of residence. The operators of the holiday village shall maintain an up-to-date register of the names of all owners of caravans on the site and of their main home addresses and shall make this information available at all reasonable times to the Local Planning Authority.

Reason: To ensure that control over the development and that the caravans do not become separate residential dwellings in accordance with policy DM4 of the Havant Borough Local Plan (Core Strategy) 2011 and NPPF.

- 4 No more than 87 units of holiday accommodation and 203 static caravans shall be stationed on the site.
Reason: To ensure that control over the development and that level of development on the site, given its sensitive location in accordance with policies DM4, DM8 of the Havant Borough Local Plan (Core Strategy) 2011 and policies AL1 and AL2 of the Havant Borough Local Plan (Allocations) 2014.
- 5 Notwithstanding the details shown on the approved plans no development shall commence unless and until a schedule of materials and samples of such materials and finishes and colours to be used for external walls, windows, and roofs of the refurbished buildings and for all caravans, including external walls, roofing, window/door frames and ancillary access or decking elements surfacing and boundary treatments have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.
Reason: To enable the Local Planning Authority to control the development in detail in the interests of the character and appearance of the area, the adjacent AONB and the quality of the development, in accordance with policies CS12 and CS16 of the Havant Borough Local Plan (Core Strategy) 2011.
- 6 No development shall take place until a further detailed Scheme of Soft and Hard Landscape Works has been submitted to and approved in writing by the Local Planning Authority. These details shall include:
i) Written specifications (including cultivation and other operations associated with plant and grass establishment,
ii) Planting methods, tree pits & guying methods,
iii) schedules of plants, noting species, planting sizes and proposed numbers/densities where appropriate,
iv) Retained areas of grassland cover, scrub, hedgerow, trees and woodland,
v) Manner and treatment of watercourses, ditches and banks,
vi) A schedule of landscape maintenance for a minimum period of 5 years include details of the arrangements for its implementation,
vii) Details of all hard-surfaces, such as paths, access ways, seating areas and parking spaces, including their appearance, depth and permeability,
viii) Means of enclosure, in particular boundary walls and planting around properties and holiday caravans including their frontages, including any retaining structures,
ix) A timetable for implementation of the soft and hard landscaping works.
The scheme of Soft and Hard Landscaping Works shall be implemented in accordance with the approved timetable. Any plant which dies, becomes diseased or is removed within the first five years of planting, shall be replaced with another of similar type and size, unless otherwise agreed in writing by the Local Planning Authority.
Reason: To achieve an appropriate landscaping scheme to integrate the development into the landscape and mitigate any impact upon the amenities of neighbouring properties, in accordance with policies CS12 and CS16 of the Havant Borough Local Plan (Core Strategy) 2011 and the NPPF.
- 7 Details of external lighting to be installed at the site shall be submitted to, and

approved in writing by the Local Planning Authority prior to the commencement of the development. The lighting shall be installed, maintained and operated in accordance with the approved details unless otherwise approved in writing by the Local Planning Authority.

Reason: To protect the amenity of future residents, create an appropriate public realm, and conserve dark night skies of the AONB in accordance with policies CS12 and CS16 of the Havant Borough Local Plan (Core Strategy) 2011, and the NPPF.

- 8 Development shall proceed in strict accordance with the ecological avoidance and mitigation measures detailed within the Habitats Regulations Assessment Screening Report Revision C (Middlemarch, April 2017) unless otherwise agreed in writing by the Local Planning Authority. All avoidance and mitigation features shall be permanently retained and maintained in accordance with the agreed details.

Reason: To protect biodiversity in accordance with the Conservation Regulations 2010, Wildlife & Countryside Act 1981, the NERC Act (2006), NPPF and Policy CS 11 of the Havant Borough Local Plan (Core Strategy) 2011, in order to provide ecological protection and enhancement in accordance with the Wildlife & Countryside Act 1981, NERC Act 2006, NPPF, Policies DM23 and DM24, CS21 of the Havant Borough Local Plan (Allocations) 2014, and the NPPF.

- 9 No development shall commence until a detailed Landscape and Ecological Management Plan (LEMP) has been submitted to and agreed in writing by the Local Planning Authority. This shall include, but not be restricted to: details of all avoidance and mitigation measures in relation to SPA bird species; details of habitat management measures for the SINC; details of ecological enhancement measures for the remainder of the application site. All mitigation and enhancement features shall be permanently retained and maintained.

Reason: To protect biodiversity in accordance with the Conservation Regulations 2010, Wildlife & Countryside Act 1981, the NERC Act (2006), NPPF and Policy CS 11 of the Havant Borough Local Plan (Core Strategy) 2011.

- 10 No development shall take place, including any works or demolition, until a Construction Environmental Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the approved plan shall be implemented and adhered to throughout the entire construction period. The Plan shall provide details as appropriate but not necessarily be restricted to the following matters:

- i) The access route of construction vehicles to and from the site.
- ii) Location of construction compound and car parking.,
- iii) Storage and location of equipment and materials.,
- iv) Potential for run-off from the site and waste disposal resulting from site preparation, groundwork and the construction phase of the development and appropriate mitigation measures,
- v) Measures to minimise creation and impact of dust,
- vi) Consideration of how certain activities will be limited in time, location or noise level to minimise the risk of disturbance to SPA birds (i.e. October to March inclusive). Details of noise monitoring of the construction and demolition work at sensitive locations,

vii) Any percussive piling or works with heavy machinery (i.e. plant resulting in a noise level in excess of 69dbAmax - measured at the sensitive receptor which is the nearest point of the SPA or SPA supporting habitat - high tide roost sites) should not be undertaken during the bird overwintering period (i.e. October to March inclusive).

viii) Measures to visually screen the construction works from the sensitive areas;

ix) Details of the ornithological watching brief necessary for any demolition and construction works during October to March.

x) During construction, access onto the sea wall from the development site should be restricted.

Reason: To provide ecological protection and enhancement in accordance with the Wildlife & Countryside Act 1981, NERC Act 2006, NPPF, Policies DM23 and DM24 of the Havant Borough Local Plan (Allocations) 2014, and the NPPF.

- 11 The development hereby permitted shall be carried out in accordance with the approved Flood Risk Assessment (FRA) (Oct 2016) and the following mitigation measures detailed in section 6 the FRA:

i) The recommended improvement/protection and maintenance regime of existing flood defences will be provided.

ii) The EA's flood warning system is signed up to.

iii) The identified safe route(s) into and out of the site (Havant Road) to an appropriate safe haven (St Patricks Roman Catholic Church, Manor Road) are made available to staff and holiday makers.

iv) Finished floor levels are set no lower than 1.115 m above Ordnance Datum (AOD).

v) Static caravans should be securely anchored to the ground

The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, unless otherwise agreed in writing, by the Local Planning Authority.

Reason: The site is within flood zones 2 and 3 where development is sensitive to flood risk, as such without the protection measures outlined within the Flood Risk Assessment in accordance with policy CS15 of the Havant Borough Local Plan (Core Strategy) 2011.

- 12 Prior to the commencement of any specific phase of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), an assessment of the nature and extent of contamination at the site, whether originating from within or outside the curtilage, shall be submitted to and approved in writing by the Local Planning Authority. The assessment shall be undertaken by competent persons, and the findings presented as a written report.

The assessment may comprise separate reports as appropriate, but unless specifically excluded in writing by the Local Planning Authority, shall include;

1) A site walk-over survey &/or sufficient desk-based research to identify;

- All relevant previous uses of the site
- Potentially significant contaminants associated with those uses
- Uncertainties relating to previous use or associated potential contaminants
- A conceptual site model identifying all relevant sources, exposure pathways and receptors, and;
- A summary of potentially unacceptable risks arising from contamination at

the site.

- Presence of historic unexploded ordnance (UXO) or bombs (UXB)

2) Site investigation based on (1), to provide sufficient data and information to adequately identify & characterise any physical contamination on or affecting the site, and to inform an appropriate assessment of the risks to all receptors that may be affected, including those off site.

3) The results of an appropriate risk assessment based upon (1) & (2), and where unacceptable risks are identified, a Remediation Strategy that includes;

- appropriately considered remedial objectives,
- an appraisal of remedial &/or risk mitigation options, having due regard to sustainability, and;
- clearly defined proposals for mitigation of the identified risks.

4) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the Remediation Strategy (3) are complete, identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

All elements shall be adhered to unless agreed in writing by the Local Planning Authority

Reason: Having due regard to policies DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and DM17 of the Havant Borough Local Plan (Allocations) [2014], Contamination may be present at the site as a result of both previous & current land uses (&/or activities) that could pose a risk to future employees & guests at the site, and/or to adjacent sensitive environmental receptors.

- 13 Prior to the occupation of any relevant part of the permitted development, any verification report required in accordance with condition 12 shall be submitted to and approved in writing by the Local Planning Authority.

The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan, and must demonstrate that site remediation criteria have been met. Where longer-term monitoring of pollutant linkages is identified as being necessary, the report shall clearly set out plans for monitoring, provision for maintenance, relevant triggers and contingency actions (a "long-term monitoring and maintenance plan").

The long-term monitoring and maintenance plan shall be implemented in accordance with the approved details.

Reason: Having due regard to policies DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and DM17 of the Havant Borough Local Plan (Allocations) [2014], Contamination may be present at the site as a result of both previous & current land uses (&/or activities) that could pose a risk to future employees & guests at the site, and/or to adjacent sensitive environmental receptors.

- 14 No development shall commence on site until details of a scheme for foul and surface water drainage has been submitted to and approved in writing by the Local Planning Authority. Such details should include provision for all surface water drainage from parking areas and areas of hardstanding. Where a SUDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should:

- i) Specify the responsibilities of each party for the implementation of

the SUDS scheme

ii) Specify a timetable for implementation

iii) Provide a management and maintenance plan for the lifetime of the development. This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

The development shall be carried out in accordance with the approved details before any part of the development is occupied and shall be retained thereafter.

Reason: To ensure adequate provision for drainage in accordance with the NPPF and in accordance with policy CS15 of the Havant Borough Local Plan (Core Strategy) 2011.

- 15 Unless otherwise agreed in writing with the Local Planning Authority, the applicant shall secure all of the following matters in relation to potential archaeology on the site:

(1) No development shall take place until the applicant has secured the implementation of a programme of archaeological assessment in accordance with a Written Scheme of Investigation (WSI) that has been submitted to and approved in writing by the Local Planning Authority in order to recognise, characterise and record any archaeological features and deposits that may exist on the site. The assessment shall take the form of trial trenching within the open areas in the western quarter of the site.

(2) If the results of the evaluation are deemed significant by the Local Planning Authority, then a programme of archaeological mitigation of impact, based on the results of the trial trenching, shall be carried out in accordance with a further Written Scheme of Investigation that has been submitted to and approved in writing by the Local Planning Authority prior to development taking place.

(3) Following the completion of all archaeological fieldwork, a report shall be produced in accordance with an approved programme including, where appropriate, a post-excavation assessment consisting of specialist analysis and reports together with a programme of publication and public engagement.

Reason: To assess the extent, nature and date of any archaeological deposits that might be present and the impact of the development upon these heritage assets, in accordance with policy DM8 of the Havant Borough Local Plan (Core Strategy) 2011 and the NPPF.