



Planning,
Statement

65 Gresham Street
London
EC2V 7NQ

T: +44 (0)20 7911 2468
F: +44 (0)20 7911 2560

Mill Rythe Holiday Village

**16 Havant Road, Hayling Island,
PO11 0PB**

Proposed redevelopment to create
a modern new family holiday park

November 2016

Prepared for:



Contents

1. Introduction.....3

2. Site Description and Context.....6

3. Planning History 9

4. The Proposal..... 11

5. Policy Context and Considerations..... 14

6. Summary & Justification for the Proposal.....22

Prepared By: Andrew Dowell
Status: Planner
Draft Date: November 2016

Reviewed By: Martin Taylor
Status: Director
Review Date: November 2016

For and on behalf of GVA Grimley Limited

1. Introduction

- 1.1 This Planning Statement is in support of a planning application on behalf of our client, Away Resorts Ltd. who own and manage Mill Rythe Holiday Village. The holiday park is located along the east coast of Hayling Island, just off Havant Road and is an extensive holiday park with 260 holiday chalets, permission for 31 static holiday caravans, a very large central facilities complex, outdoor pool, extensive parking area, cafes and various recreation facilities.
- 1.2 The park is extremely out of date, retaining the form of an old-style post-war catered 'holiday camp'. The family holiday market deserted this type of facility in the 1970s; however, it struggled on providing catered holidays to the older generation. However, that generation is now gone and this type of facility no longer has a market. Away Resorts, who took over the site a few years ago, are seeking to completely overhaul the site and turn it into a flagship family holiday resort.
- 1.3 Modern family holidays are a mixture of self-catering and using pub-restaurants and restaurants both on-site and off-site. This is good for the local economy as families venture out to use local pubs and restaurants rather than being forced to eat on site due to all inclusive catered holidays. This means reducing the six of the central facilities buildings which are too large to be economically run and no longer fit for purpose. It also means removing many of the old style chalets that are too small, poorly insulated and no longer acceptable in the modern market. Those that are more robust will be combined and refurbished to create a modern chalet unit with bedroom, bathroom, and kitchen/diner/lounge areas. Those that are not retrievable will be replaced by modern static holiday caravans.
- 1.4 There will be no increase in the permitted number of holiday units at the site. They will be larger with better facilities, but they will not accommodate any increase in the number of people staying at the site. Therefore, there will be no increase in the number of people staying at the site and therefore no impact on the nearby areas of nature conservations. There will also be increase in the number of vehicles generated by the site and permitted at the site and no traffic implications. The size and extent of permanent buildings on the site, many of which are two storey, will be reduced to be replaced by single storey caravans. The buildings that remain will be restyled and re-clad in more attractive materials. New landscaping will improve the screening of the site from views such that it will appear as an area of woodland.
- 1.5 These proposals represent a major investment in the park in accordance with Away Resorts' aspirations to provide improved guest facilities and accommodation within a high quality holiday park that matches the high expectations of modern families looking for a great holiday.

GVA Hotels & Leisure

- 1.6 GVA Hotels & Leisure is the specialist tourism advisory arm of GVA, one of the UK's top property consultancies. With twelve offices covering the whole of the UK, the team has the capability to provide the full range of property advisory services to leisure businesses across the regions.
- 1.7 Our specialist planning and consultancy services team has extensive experience of providing viability, regeneration and development consultancy, planning advice, applications, appeals and expert witness evidence of planning inquiries for development in the tourism and leisure sector. We are retained as national planning advisors to the British Holiday and Home Parks Association, the representative body for the caravan parks industry.

Other Supporting Information

- 1.8 In addition to this Planning Statement, the planning application is accompanied by the following documents:

- Application Form and Ownership Certificates
- 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)
- Visuals by A&M:
 - Visual 1- Proposed Caravan Development Area
 - Visual 2- Proposed Central Area Development
 - Visual 3- Proposed Chalet Refurbishment
- Landscape and Visual Impact Assessment by EBLA (Ref: 16030)
- Landscape Plan by EBLA (Ref: 16030-CO-LP-0-01-REV-2)
- Preliminary Ecological Appraisal by Middlemarch Environmental (Ref: RT-MME-123420-01)
- Preliminary Roost Assessment by Middlemarch Environmental (Ref: RT-MME-123420-02)
- Habitat Regulations Assessment by Middlemarch Environmental (Ref RT-MME-123420-03)
(To be submitted separately)
- Tree Survey, Arboricultural Impact Assessment, Tree Protection Plan & Heads of Terms for the Arboricultural Method Statement by MJC Tress Services Ltd. (Ref: MJC-16-0182)
- Flood Risk Assessment and Outline Drainage Strategy by H20K (Ref: J-10847)

2. Site Description and Context

Site Location

- 2.1 Mill Rythe Holiday Village is located along the east coast of Hayling Island just off Havant Road. The site is directly adjacent to the coastline of Chichester Harbour along the Mill Rythe estuary. Mill Rythe Holiday village comprises an irregular shaped parcel of land which measures 13.9 hectares (34.4 acres) and has been in use as a holiday park since at least the 1940's and is laid out as an old fashioned catered holiday camp.
- 2.2 The holiday village is accessed from the A203, which is the main arterial link between the A27 and Hayling Island Seafront. The site is located at the east of Gable Head which is identified as District Centre. Gable Head has a number of retail uses and is anchored by a Co-Op supermarket.



Figure 1: A map showing the location of the park in surrounding context

- 2.3 Havant Train Station is easily accessible by bus or taxi being 7.2 km (4.5 miles) from Mill Rythe Holiday Village. The nearest bus stop is located just outside of the train station on Kings Road approximately 600 meters from the application site. This is serviced by bus numbers 30 and 31 which connect to Havant Town Centre rail station and other bus services 30 and 31 which connect to Havant Town Centre Rail Station and other bus services. A ferry runs from Portsmouth

to Hayling and carries passengers, cycles and motorcycles. Hayling ferry runs regular services from the south western tip of Hayling Island over to Eastney in Portsmouth.

- 2.4 The site is in close proximity to a number of public houses, the Maypole (1.5 km) and the Yew Tree Inn (1.8 km). There is also a Post Office located 1.5 km from the site and a Sainsbury's supermarket 2.2 km from the site. In addition to the pubs, there are a range of eateries such as the Newton House Hotel and Restaurant and Spice Island Indian Restaurant are located approximately 1.5 km from the application site.
- 2.5 The site is also close to a number of tourist attractions including Hayling Island's Beaches and seafront attractions. In addition, the island is a good base for visiting the sub regions wider attractions such as Portsmouth Historic Dockyard, Southsea, Funland, Goodwood Racecourse, historic Chichester, Fishbourne Palace, and Staunton Country Park.

Site Description & Surroundings

- 2.6 It should be noted that Mill Rythe provides an extensive range of facilities for guests. The holiday park consists of the following buildings, land use, and facilities:
- 260 holiday chalets, with implemented permission for 31 additional static holiday caravans
 - Central facilities complex with offices, reception, ballroom, restaurant bar, indoor pool and hair/beauty salon
 - Separate 'Hudsons' pub-restaurant
 - Boating lake and playground
 - Outdoor pool with kiosk
 - Separate café
 - Extensive car and coach parking
 - Former Pitch & Putt Golf Course

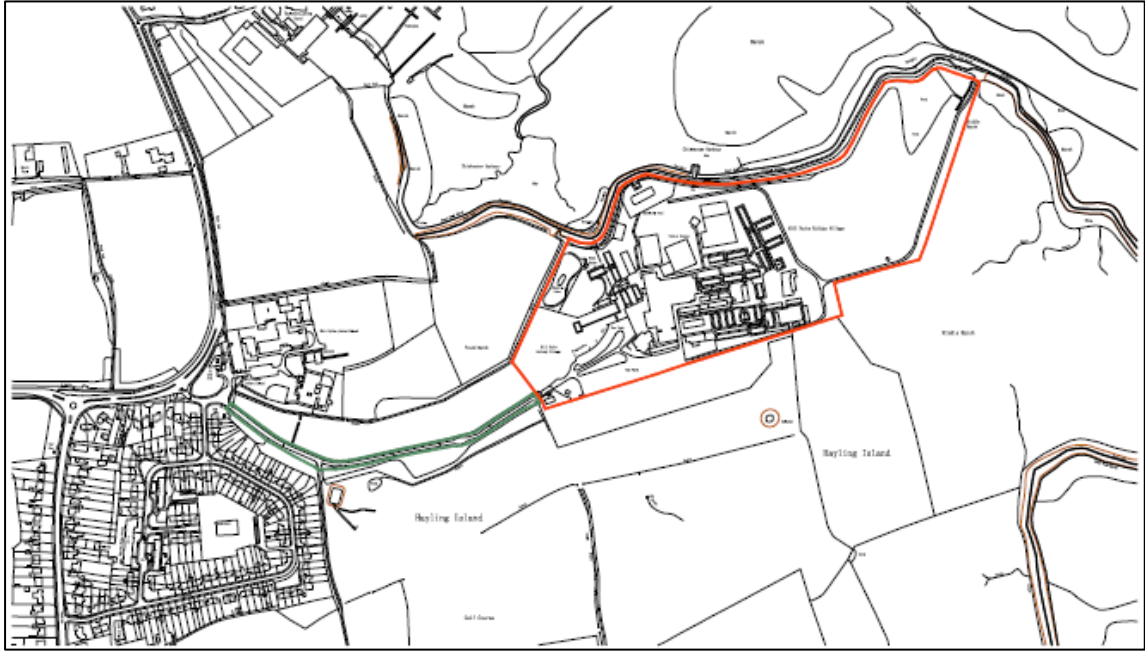


Figure 2: Site Location Plan (Ref: 3877-300)

2.7 In terms of the surrounding uses, the north of the park is bound by the Rythe forming part of Chichester Harbour. To the east and west of the park is surrounded by open fields with the 9 hole Tournerbury Golf Course lying to the south. There is residential development further to the west of the site which abuts the A3020 Havant Road. The aerial image in Figure 3 show the site appears from the air.



Figure 3: Aerial image showing the site in context

3. Planning History

- 3.1 The full planning history for Mill Rythe Holiday Village is attached as Appendix 1. It demonstrates gradual development of the site with chalets from the 1950's and through the 1960's, followed by the redevelopment and replacement of chalet blocks in the 1970's, including the provision of staff accommodation, and refurbishment and extensions in the 1980's. Throughout this time there were a number of applications to build, rebuild, refurbish and expand the central facilities, pub-restaurant and other amenity buildings at the site.
- 3.2 There has been several permission for staff accommodation including 98/54406/019 which allowed for the siting of new mobile home for additional staff dwelling to the south east of the holiday village. 97/54406/017 permitted the renewal of temporary planning permission 92/54406/4 for the siting of 4 staff caravans. A new general manager's house and car port was permitted in 1991 under permission 91/54406/002.
- 3.3 Permission 22567/12 was approved in 1975 for the redevelopment with new staff toilet block/boiler room and 8 staff cabins (ref: 22567/12). The demolition of substandard wooden staff chalets and erection of 14 staff chalets was previously approved in 1974 for (ref: 22567/9).
- 3.4 Latterly, permission has been given to site 31 static holiday caravans in the central north area of the park in 2013 (ref: APP/11/01080). This permission has been implemented by the discharge of prior-commencement conditions in 2016 and the development of a number of two pitches in Spring 2016 which is currently ongoing this Winter.
- 3.5 We have not come across any restrictions on the length of season for the operation of the site, either in the description of the development permitted, or attached with (the few) conditions we have been able to view.

Pre-Application Advice

- 3.6 We wrote to Havant Borough Council on 25 July 2016 requesting pre-application advice regarding a similar proposal to demolish parts of the central facilities building and refurbish the remainder, to demolish chalets that were 'beyond redemption' and replace them with 183 static caravans and to refurbish the remaining chalets as 74 chalet suites.
- 3.7 We received a formal written response from Mrs H. Lealan on 8 September 2016. At this stage, the Planning Officer was still awaiting a number of consultee's comments including Natural England, Environment Agency, and Chichester Harbour Conservancy and intended providing an updated response on receipt of these comments which we never received.

- 3.8 The Officer agreed that the proposals would enhance the tourism offer on the island, making valuable contribution to the local economy. The Officer also agreed that that the proposal complies with the general requirements of Policy CS5, which seeks to safeguard and improve tourism facilities in the Borough
- 3.9 The Officer considered that the site is a highly sensitive location in terms of potential ecological impact but did not have sufficient information to consider any possible impact on neighbouring wildlife areas. That information is enclosed with this application in the form of three Ecological Reports dealing with different aspects.
- 3.10 The officer expressed concerns with regard to the proposal to refurbish some of the chalets in what she perceived to be 'bright colours' and at a two storey height adjacent to the site's boundary with the AONB. We hope that we have resolved this by the more muted colour template detailed in the Design & Access Statement which may be secured by condition. We are happy to discuss any changes to the proposed template, provided that the development does not end up looking too drab. After all, it is, and has long been a holiday park.
- 3.11 The officer reported on comments received from the Highway Engineer in that he considered that in principle the replacement of holiday chalet with static caravans is acceptable and that a transport statement will not be needed. He has requested confirmation that we are comparing like with like, for example assurance that the static caravans would not be capable of taking two families and therefore produce additional car journeys. We are happy to confirm that each caravan (and refurbished chalet) is designed to accommodate one family only, and will not be let or sold to more than one family staying at a time.
- 3.12 The Highway Engineer also raised concern that the development will require the delivery of a large number of caravans and the application should include a method statement of how the development of the site will be phased. It is too early to predict the phasing of the development which will depend upon the economic situation prevailing at the time of permission (which is currently in a state of flux ahead of 'Brexit' negotiations) and therefore the customer demand and funding available. Our clients have put a lot of investment into this application and are determined to carry through this long over due regeneration of the site, nevertheless, the redevelopment will not happen overnight, it will happen in phases, it is very unlikely that more than 25-40 caravan will be brought onto the site in any year, and these movements will mainly take place from November to March (inclusive), outside the main holiday season, when the roads are less busy with less holiday traffic.
- 3.13 Other matters raised by the officer have been dealt with in the policy section of this statement.

4. The Proposal

4.1 The application is submitted with the following description of development:

'Change of use of land for the siting of 204 holiday caravans including 5 caravans for use as staff accommodation, refurbishment of single and two storey holiday chalets to form 87 units of holiday accommodation, retain managers bungalow, sales area for 5 caravans, refurbishment 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. Retaining existing pitch and putt golf course to the east of the site.'

4.2 The proposed layout plan Ref: 3877-410 Rev D (extract in Figure 4 below) show the improved site will be laid out in attractive crescents with a mixture of single storey self-catered chalets, two storey self-catered chalets, caravans and landscaping. This will allow the park to provide a variety of sizes of accommodation.



Figure 4: Layout Plan Ref: 3877-410 Rev D

- 4.6 More detail on the development of the layout and the refurbishment of the chalets and central facilities is provided in the Design and Access Statement.

5. Policy Context and Considerations

- 5.1 This section of the Planning Statement identifies the local and national planning policy context of the site and in particular those policies which have a direct bearing over the proposed improvements to the park.

National Planning Policy

National Planning Policy Framework (27 March 2012)

- 5.2 The National Planning Policy Framework (NPPF) addresses the Government's vision of achieving sustainable development. Two key objectives are the need to deliver sustainable development and support a prosperous rural economy. The NPPF states that there are three different dimensions to sustainable development, namely the economic role, social role and environmental role (**paragraph 7**). In terms of this proposal, I consider that these roles are met as follows.

1. **An economic role** - the holiday park use generates local employment both directly at the site and indirectly through the off-site spending of visitors at other local service providers on the Island and in the rest of the District. The redevelopment of the site to provide modern quality holiday accommodation and modern holiday facilities will bring higher spending families back to the Island supporting and creating new local jobs and services. This is therefore an important consideration in this application which will improve the performance of the business at the site.
2. **A social role** - The holiday park provides the opportunity for recreation in the countryside, particularly walking, cycling and swimming, promoting good health and social interaction. In social terms, some of the spending will be spent directly (by visitors), and indirectly (by local workers in receipt of wages from visitor spending), in local pubs and restaurants helping to maintain their viability as local social facilities. Again, this use will be enhanced and these are important considerations in any application to improve the working of the business.
3. **An environmental role** – the proposals will not have any detrimental effect on the biodiversity, landscape, or character of the countryside. Indeed through the careful positioning of the caravans, retention of existing trees and proposed landscaping this use will enhance the biodiversity and appearance of the application site. The holiday park is sustainably located with access to a choice of means of transport.

- 5.3 Therefore, this proposal is sustainable development. **Paragraph 14** of the NPPF states that *'at the heart of the National Planning Policy Framework is a presumption in favour of sustainable development'*, which should be seen as a golden thread running through both plan making and decision taking'. It follows that if the proposals meet the three roles of sustainable development as outlined above, then there should be a presumption in favour of the development.
- 5.4 In order to deliver sustainable development one of the key objectives is to build a strong and competitive economy. In this context, **Paragraph 18** states that *'the Government is committed to securing economic growth in order to create jobs and prosperity'*. Paragraph 19 states that *'planning should operate to encourage economic growth and should not act as an impediment to sustainable growth. Therefore, significant weight should be placed on the need to support economic growth through the planning system'* (my emphasis). Meanwhile, **paragraph 20** states that *'local planning policies should plan proactively to meet the development needs of business and support an economy for the 21st Century'*.
- 5.5 Objective 3 is to support a prosperous rural economy in order to create jobs and prosperity by taking a positive approach to sustainable new development. **Paragraph 28** states that plans should:
- '.....support sustainable rural tourism and leisure development 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 where identified needs are not met by existing facilities in rural service centres'*.
- 5.6 The proposals accord with the national policy in these paragraphs in that the out-dated catered holiday camp style of accommodation and facilities no longer meets the demand of the modern holiday market and the proposed new and refurbished accommodation and facilities will provide higher quality accommodation which will reconnect the site with the family holiday market and attract higher spending visitors to support local economic growth. Accordingly the Council should give these proposals significant weight.
- 5.7 **Paragraph 114** states that *'local planning authorities should maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes particularly in areas defined as Heritage Coast, and improve public access to and enjoyment of the coast'*. **Paragraph 115** also places great weight on conserving the landscape and scenic beauty of the Areas of Outstanding Natural Beauty.
- 5.8 The development proposals have gone to great lengths to reduce and minimise the impact of the site on the adjoining coastal areas and when viewed from the AONB: the large central building complex has been sensitively reduced in size, with more attractive fenestration, brick slips

and weatherboard cladding; many of the older and poorly insulated single and two story chalets will be removed to be replaced by single storey caravans; the remaining chalets will be refurbished with new fenestration and weatherboard cladding in a mixture of subtle colours that can be subject to condition; existing trees are retained and the proposed tree planting will improve the screening of the site from sensitive landscapes.

- 5.9 Objective 4 deals with promoting sustainable transport and **paragraph 29** states the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. The site is located within a sustainable location. The site is close to a number of amenities such as Public Houses, a Post Office and a Sainsbury's supermarket. The site is also close to a number of tourist attraction including Hayling Island's beaches and seafront attractions. Havant Train Station is easily accessible by bus or taxi being 7.2 km (4.5 mile) from Mill Rythe Holiday Village. The nearest bus stop is located just outside of the site on Kings Road, approximately 600 m from the application site. Various other modes of transport available to customers without becoming reliant on private car use. There will be no increase in the amount of accommodation at the site and therefore we have not considered a Transport Statement necessary in support of the application.

National Planning Practice Guidance (27 March 2014)

- 5.10 The recently published National Planning Practice Guidance (NPPG) provides detail on flood risk. The site is already located within flood zone 3. A Flood Risk Assessment is submitted with the application which confirms that the site is protected by an embankment that provides tidal flood protection. The main danger of flooding therefore comes from the overtopping or breaching of sea defences in a 1 in 200 year event. A Flood Warning and Evacuation Plan is provided for such circumstances.
- 5.11 The proposal therefore accords with the NPPG which states that 'more vulnerable' uses (such as holiday caravans and chalets) may be acceptable at the subject site subject to a sequential and exception test and provision of a Flood Warning and Evacuation Plan.
- 5.12 With regard to the sequential and exception tests there is little of the site that is outside this zone at risk of flooding. There will be no increase in the number of units of holiday or staff accommodation or the number of families that can be accommodated at the site. The occupants of the proposed caravans and refurbish chalets will therefore be no more at risk of flooding than the current visitors. Indeed, the occupants of the caravans will be at a lesser risk as caravan floor levels are 500-600mm above ground level. The proposed development will result in the long overdue regeneration of the site. The sequential and exception tests are therefore directly passed.
- 5.13 When planning for tourism, the NPPG states that local planning authorities should:

- Consider the specific needs of tourist industry, including particular locational and operational requirements;
- Engage with representatives of the tourism industry;
- Examine the broader, social, economic, and environmental impacts of tourism;
- Analyse the opportunities for tourism to support local services, vibrancy and enhance the built environment; and
- Have regard to non-planning guidance produced by the other Government Departments.

5.14 With regard to the latter, it states that local planning authorities may want to consider guidance and best practice produced by the tourism sector pointing the reader to Tourism and Planning Guidance hosted on the Visit England website.

5.15 With regard to accommodating tourism in rural areas this national tourism planning guidance states: *'There may be circumstances where a traditional market has changed and the local tourism provision needs to restructure; in some areas long standing changes in visitor numbers may have left a considerable surplus of hotel, guest house, pub and bed & breakfast accommodation. This can leave many businesses struggling on very low turnover, unable to reinvest in improving their facilities. In such circumstances, owners and developers will need to work collaboratively with local planning authorities and others to provide where appropriate a productive alternative use for premises'*.

5.16 This is the case with this application where the post-war family market has completely changed and the more recent older persons coach market is in terminal decline. Our clients are therefore seeking to revive the site to create a fantastic holiday destination that meets and exceeds modern family market expectations. This will be a tremendous boost for Hayling Island and the District's local economy and should be accorded great weight in considering the application.

5.17 The national Tourism Planning Guidance also advises local planning authorities to encourage all year opening of holiday facilities and that the provision of on-site staff accommodation is often essential to deliver quality service to the customer, security for the property, and to meet the obligations of health and safety regulations. The existing holiday village benefit from all year use and permission for a manager's bungalow, 22 staff chalets and 4 staff caravans. We therefore do not consider that there will be any policy issue in continuing to allow the all-year holiday use of the park with up to 5 staff caravans.

Local Planning Policy

- 5.18 Planning applications are subject to policies of the adopted Core Strategy (March 2011) and Local Plan (Allocations) 2014.

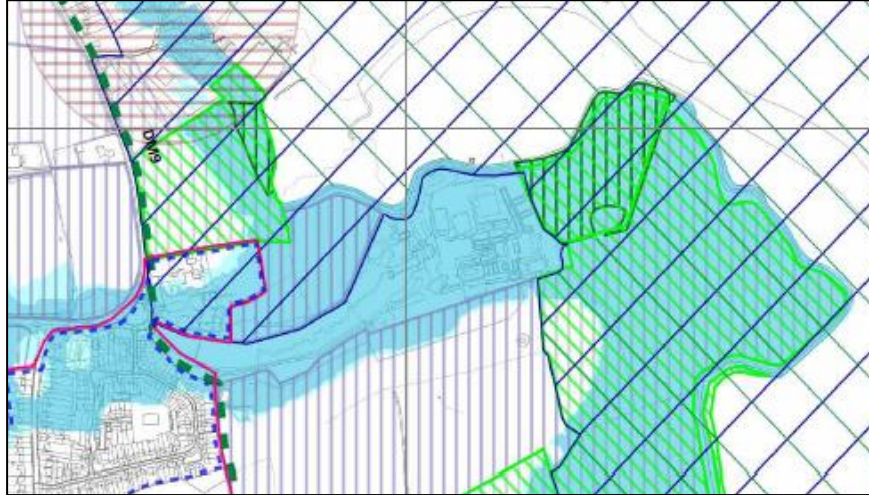


Figure 6: Core Strategy Policies Map

- 5.19 The Policies Map identifies the whole site as lying within Flood Zone 3 subject to policy CS15 (light blue). The estuary to the north is designated as part of the Chichester Harbour Area of Outstanding Natural Beauty (purple hatch) that also adjoins the rest of the site to the north (CS12) and as a Site of Special Scientific Interest, Special Protection Area and Special Area of Conservation subject to policy CS11.3 (green hatch).
- 5.20 The Pitch and Putt course on the north eastern part of the site is classed as an important site for Brent Geese and/or waders subject to policies CS11 & DM23 (bright green hatch), a Site of Importance for Nature Conservation subject to policy CS11.3 (vertical dark green hatch), and also included within the above mentioned AONB.
- 5.21 There is no particular designation relating to the tourism use of the holiday park itself.
- 5.22 The main local policy guiding holiday accommodation and facilities is Policy **CS5- Tourism** which states:

Planning permission will be granted for appropriate development proposals around the borough that:

- 1. Provide sustainable and small scale recreational opportunities.*
- 2. Provide hotel and other types of tourist accommodation*
- 3. Safeguard existing tourist facilities, hotels, holiday centres and caravan parks.*
- 4. Improve existing tourist facilities, hotels, holiday centres and caravan parks.*

5.23 The proposed redevelopment fully accords with this policy in safeguarding and improving an established holiday centre through investment in the improvement of the central facilities and holiday accommodation.

5.24 **Policy DM3** seeks to protect existing tourism sites from a change of use to alternative uses. It states that the change of use of site to non-tourism purposes will only be permitted where it can be demonstrated that the premises are not fit for purpose and financially unviable. That is the case with Mill Rythe, where the out of date nature of holiday accommodation and facilities meant that the former holiday village fell into administration. Away Resorts purchased the site out of administration and have been slowly investing in the recovery of the site since. However, they have found that the fundamental flaws of the site extremely poor and out of date accommodation and too large a facilities building can no longer be overcome by tinkering and that a more radical demolition, refurbishment and redevelopment programme is required to keep a tourism use at the site. Therefore, the proposed development fully accords with policy DM3.

5.25 **Policy DM4** deals with Static Caravan Development and states:

Development involving the provision, continued location or improvement of static holiday caravan sites will only be permitted where both of the following criteria are met:

- 1. The development would have a close physical relationship to existing caravan sites.*
- 2. The caravan is to be used for holiday purposes only and has a limited period of occupancy for a maximum of ten months occupancy for ten months per calendar year.*

5.26 The site already has an implemented permission for 31 static holiday caravans. The proposed siting of caravans will lead to the improvement of an existing holiday park with a mixture of out-of date holiday chalets and some more recent static caravans. The proposed redevelopment of the site to refurbish existing holiday chalets and replace others with static caravans fully accords with Part 1 of policy DM4 (and Policy CS5).

5.27 The existing holiday park has no restriction on the holiday season and already has permission for all year holiday use. There is no justification for introducing such a restriction now, restricting this use to 10 months of the year, which would deny my client's existing right to provide holiday accommodation in the winter months and thereby undermine the viability of the project and discourage the proposed modernisation of the site. This (second) part of policy DM4 does not accord with national Tourism Planning Guidance referred to in the NPPG, which states: '*As tourism is an all-year business, conditions restricting tourist accommodation to seasonal use should only be used where it is clear that the condition can be justified as being necessary, and meeting the other tests of lawful conditions laid out in Paragraph 206 of the NPPF*'; nor does it accord with paragraph 28 of the NPPF as it may prevent sustainable rural tourism development.

- 5.28 The site currently lies in the non-urban area, as defined by policy AL2 of the Havant Borough Local Plan (Allocations). **Policy AL2** allows for development within the undeveloped gaps, subject to three tests:
1. Relates to small scale householder development.
 2. Meets an overriding public need e.g. for community or recreation use, that cannot be accommodated elsewhere in the Borough.
 3. Meets the policies for exceptional development in 'rural areas', set out in the NPPF.
- 5.29 Additional guidance is provided by the supporting text to Policy AL2 at paragraph 2.10. The text recognizes the importance of established holiday centres on Hayling Island and in particular, their contribution to the tourism offer and the local economy. *'Proposals that would enhance these facilities will be encouraged providing that they comply with all other Local Plan policies particularly with regard to flood risk and nature conservation'.*
- 5.30 The proposed development addresses this policy in that it provides for the regeneration and revival of this important established holiday centre on Hayling Island in accordance with paragraph 28 of the NPPF.
- 5.31 **Policy CS11** deals with Protecting and Enhancing the Special Environment and Heritage of Havant Borough. The proposal addresses this policy as the proposed boundary, amenity space and internal planting will strengthen the existing boundary planting and further enhance biodiversity in the area whilst improving the visual setting of the site within the surrounding landscape.
- 5.32 **Policy CS12** deals with the Chichester Harbour AONB. It states that development will be permitted where it carefully assesses its impact on the AONB, and its setting, is appropriate to the well being and understanding of the area, conserves and enhances the quality of the AONB, meets the policy aims of the AONB Management Plan and mitigates any damaging effects. The application is submitted with a full Landscape and Visual Impact Assessment which carefully assesses the proposed redevelopment of the park finds that, together with the proposed landscape planting, it will improve the appearance and setting of the site from the AONB.
- 5.33 **Policy CS15** identifies area of flood and coastal erosion risk in which this proposal sits. Development in these areas that are identified at risk of flooding will only be permitted where:
1. *It meets the sequential and exception test (where required) in relation to PPS25.*
 2. *The site is located in a low hazard area as defined in Strategic Flood Risk Assessment.*

3. *A site-specific flood risk assessment demonstrates that the development will be safe, including the access, without increasing the flood risk elsewhere, and, where possible, will reduce flood risk overall.*
4. *The scheme incorporates flood protection, flood resilience and resistance measures appropriate to the character and biodiversity of the area and the specific requirements of the site.*
5. *Appropriate flood warning and evacuation plans are in place.*
6. *New site drainage systems are designed taking account of events which exceed the normal design standard.*

5.34 Although the site is within an area at risk of flooding, it is well defended by sea defences and directly adjoins higher ground outside the zone at risk of flooding affording easy evacuation in the event of an extreme event. As there will be no increase in the number of accommodation units permitted at the site there will be no increase in risk to people or property at the site. A Flood Risk Assessment is submitted with the application which recommends a Flood Warning and Evacuation Plan to ensure the safety of people visiting the site. These can be secured as a condition of approval.

5.35 **Policy DM23** deals with sites for Brent Geese and Waders. This states that planning permission will be granted for developments that avoid important sites for Brent Geese or Waders. Where this cannot be avoided development proposals on or adjacent to such areas will need to demonstrate that there is no net loss of habitat. A Habitat Regulations Assessment has been prepared by Middlemarch Environmental, and is submitted with this application. The HRA concludes that since there is no increase in the number of holiday accommodation units there is unlikely to be any significant effect on protected species. However, as a precautionary approach the Assessment recommends a number of measures including a Construction Ecological Management Plan and Ecological Information for Holiday Guests. These can both be secured by condition.

6. Summary & Justification for the Proposal

- 6.1 Away Resorts are seeking to regenerate this important, long established, but very out of date holiday park and bring it up to much higher standards now expected by families looking for a memorable holiday. By allowing our client to modernise and expand their holiday park will strengthen the business, allowing it to take advantage of increased demand for domestic holidays as well as increasing the positive impact on the local economy through increased visitor spending at local pubs, restaurants, shops and transport providers.
- 6.2 The proposal is to demolish parts of the over-large central facilities building and refurbish it with more attractive fenestration, brick slips and weatherboard cladding. Many of the older and poorly insulated single and two story chalets that are 'beyond redemption' will be removed to be replaced by 204 single storey caravans. The remaining single and two storey chalets will be refurbished as 87 units of holiday accommodation with new fenestration and weatherboard cladding in a mixture of subtle colours that can be subject to condition. The layout has been worked around existing trees which are mostly retained while substantial tree and shrub planting is proposed that will provide wildlife corridors and improve the screening of the site from sensitive landscapes.
- 6.3 In conclusion, we consider our client's proposals for the redevelopment of the site are acceptable for the following reasons:
- a) The restoration of the site will **support the local economy and existing community services** through additional spending at local pubs, cafes, restaurants, shops, visitor attractions, taxis and bus services without any detrimental effect on the biodiversity, landscape, or character of the countryside. The site is also in a sustainable located with access to a choice of means of transport. The proposals are therefore **sustainable development** that should be approved in accordance with paragraphs 7, 14, 18, 19 and 28 of the NPPF and local plan policies CS5, DM3, DM4 and AL2.
 - b) The reduction in the size and recladding of the two plus storey central facilities building, the recladding of existing chalets that remain, the demolition of two storey chalet buildings to be replaced by single storey caravans, and the retention of trees combined with extensive tree and shrub planting proposals, means that the existing impact of the holiday site on views from the AONB and coast will be diminished immediately and enhanced over time in accordance with paragraphs 114 and 115 of the NPPF and local plan policy CS11 and CS12.
 - c) There will be no increase in the number of units of holiday or staff accommodation or the number of families that can be accommodated at the site. Indeed, average family size

has declined a lot since the heyday of the 'holiday camp' and continues to decline today. Therefore, there will be no net impact on the adjoining sites and areas of nature conservation. The existing pitch & putt course has been left and therefore its role as a site for Brent Geese and Waders is unharmed. The proposals therefore accord with local plan policy DM23

- d) As there will be no increase in the number of units of holiday or staff accommodation or therefore the number of families that can visit the site there will be no net impact on the local highway infrastructure. The site is also sustainably located with a choice of means of transport to local pubs, restaurants, shops, beaches and tourist attractions. The proposals therefore accord with paragraph 29 of the NPPF.
- e) The site is already located within flood zone 3 Although the site is within an area at risk of flooding, it is well defended by sea defences and directly adjoins higher ground outside the zone at risk of flooding affording easy evacuation in the event of an extreme event. As there will be no increase in the number of accommodation units permitted at the site there will be no increase in risk to people or property at the site. A Flood Risk Assessment is submitted with the application which recommends a Flood Warning and Evacuation Plan to ensure the safety of people visiting the site. The proposals therefore accord with the NPPG and Policy CS15.

Appendices

Appendix 1 – Planning History

The table below sets out the complete planning history for Mill Rythe Holiday Village as far as we have been able to ascertain from Havant Borough Council's planning search papers and a review of planning applications at the site listed on the Council's own website.

Applications on the Council's website between 1990 and 1995 are often recorded as 'not yet determined', sometimes alongside a reference to a decision to grant or refuse. This is because the Council did not record decisions on their database at that time. Equally, decisions from the late 1970's and 80's were not on the website, and have no decision recorded on the planning search.

Application Reference	Details of Proposal	Decision	Date of Decision
11/01080	was granted change of use of land for the siting of 31 static caravans in the northern area of the park.	Granted	7.6.13
08/54406/024	Internal alterations and external refurbishment of 'Dover' block. Replacement of 24 one bed short stay units with 8 one and two bed medium stay flats	Granted with conditions	15.5.09
00/54406/23	Chalet alterations and extension including Dover, Nutley, Norfolk, Windsor, Seaton, Solent, Ryde and Tenby	Not proceeded with?	
99/54406/22	Infill extension under roof canopy to both sides of chalet block Norfolk and Nutley with smaller extension to one side	Withdrawn	
99/54406/21	Infill extension to east elevation of staff chalet block (south east main building)	Granted (no conditions)	14.5.99
98/54406/20	For siting of new mobile home for additional staff dwelling to south of holiday village	Refused	26.11.98
98/54406/19	For siting of new mobile home for additional staff dwelling to south east of holiday village	Refused	26.11.98
97/54406/18	Infill extension under existing roof canopy to one side of chalet block	Granted (no conditions)	3.2.98
97/54406/17	Renewal of temporary planning permission 92/54406/4 for the siting of 4 staff caravans	Granted (temporary)	16.10.97
95/54406/16	Two floodlights attached to piers of entrance archway to illuminate archway sign	Not yet decided	
95/54406/15	Outdoor all weather 4 lane bowls rink including floodlighting	Granted (no conditions)	26.10.95
94/54406/14	New bedroom accommodation; enlarged restaurant; improved indoor pool; sports hall; outdoor sports facilities; floodlights; car parking; landscaping	Not yet decided	
94/54406/12	Extensions to York and Wells chalet blocks	Granted/not yet decided	
94/54406/11	Two halogen floodlights mounted on columns to illuminate existing entrance sign	Refuse/not yet decided	
93/54406/10	Arched entrance sign letters on wrought ironwork	Granted (no conditions)	7.3.94
93/54406/08	Extensions to provide glazed reception area concourse, ballroom extension and children's amusement building	Granted/not yet decided	

93/54406/06	Retention of existing abseiling tower in Northwest area of site	Not yet decided	
93/54406/05	Double car park at General Managers house	Not yet decided	
92/54406/04	Renewal of temporary planning permission 88/50376/2 for the siting of 4 staff caravans	Not yet decided	
92/54406/02	New general managers house and car port in south western corner of site	Granted (no conditions)	23.4.92
88/50376/02	Provision of 4 temporary caravans for staff accommodation for a limited period only terminating 1 st March 1993		
88/50376/1	Advt for nine externally illuminated signs for a limited period of 5 years		
88/50376	External alterations to pub		
88/22567/35	Extensions to Wagtails playgroup building		
87/22567/34	Laying and operating a 2" narrow gauge railway carrying passengers		
86/22567/30	For new housing for cold water storage tanks on roof of hotel block and alterations to windows on side elevations		
86/22567/29	New reception area, small indoor pool and other attendant facilities		
82/22567/28	Replacement single storey administrative building		
82/22567/27	Proposed alterations to cabaret bar building		
81/22567/26	Extension and alteration to existing shop to form a new coffee lounge to the cabaret bar		
79/22567/24	Upgrading of 4 existing chalet blocks with ensuite bathrooms and erection of 2 additional blocks of 8 units		
79/22567/23	Construction of earth bank to protect holiday centre from tidal flooding, and lake		
78/22567/22	<i>Can't read</i>		
77/22567/21	Upgrading of 4 existing chalet blocks and erection of 2 additional blocks each comprising 8 units		
77/22567/19	New block of 10 chalets and alterations to existing 3 blocks of chalets		
77/22567/18	Portakabin for additional office space for limited period terminating 31.10.80		
77/22567/17	Extension to existing restaurant		
22567/16	For Bar Annexe Extension	Approved	6.9.76
22567/15	For alterations and extension to 3 existing blocks of chalets and erection of one new block of 8 chalets with integral bathrooms to form luxury accommodation.	Approved	11.10.76
22567/14	For alterations and extensions to clubroom	Approved	16.2.76
22567/13	For demolition of existing camp shop and erection of new shop and store with staff toilet	Approved	2.11.75
22567/12	For redevelopment with new staff toilet block/ boiler room and 8 staff cabins	Approved	27/8.75
22567/11	For extension to form entrance lobby and enlargement of existing bay window	Approved	24.2.75
22567/9	For demolition of substandard wooden staff chalets	Approved	16.9.74

	and erection of 14 staff chalets in one block		
22567/8	For stillroom adjacent to kitchen after demolition of building known as 'Plateau Express'	Approved	20.11.73
22567/7	For stillroom and waitress reception and cloakroom	Approved	20.11.73
22567/6	For portakabin for staff accommodation	Approved	20.11.73
22567/5	For alterations and extensions to administrative reception building	Approved	18.9.73
22567/4	For single storey horticultural and estate store	Approved	20.8.73
22567/3	For entrance foyer and canopy to east end of restaurant	Approved	20.8.73
22567/2	For waitress reception and cloak room adjoining restaurant	Approved	21.3.73
22567/1	For alterations and construction of new flue to central kitchen boiler house	Approved	22.8.72
22567	For the demolition of 30 sub standard chalets and erection of 30 luxury chalet units with ensuite accommodation in a two storey block.	Approved	1.9.72
14643/31	For demolition of 16 no. chalets and erection of 36 luxury chalet units with ensuite toilet accommodation in 3 two storey blocks of 12 together with detached boiler house/tank room/drying room block	Approved	21.7.71
14643/30	For extensions and alterations to 16 chalets	Approved	19.10.70
14643/29	For rebuilding of ballroom (phase three)	Approved	25.8.70
14643/28	For redesign of two storey block of 40 staff cabins	Approved	25.8.70
14643/27	For the demolition of 46 substandard chalets and the erection of 60 new chalet units complete with toilet accommodation, boiler house, tank room and drying room, in total comprising 4 blocks in two storey and single storey construction	Approved	30.4.70
14643/26	For rebuilding of ballroom	Approved	25.8.69
14643/25	For extension to lounge	Approved	17.2.69
14643/24	For a new west façade to dining room	Approved	26.8.68
14643/23	For a single storey block of 30 chalets	Approved	26.8.68
14643/22	For 2-storey block of chalets	Approved	24.9.68
14643/21	For the addition of a canopy to the dining hall	Approved	20.11.67
14643/20	For the revised design of a sun lounge	Approved	20.11.67
14643/19	For the extension to the clubroom	Approved	14.7.67
14643/18	For the erection of a sun lounge	Approved	14.7.67
14643/17	For the demolition of existing timber nursery and erection of children's nursery block	Approved	12.5.67
14643/16	For the extension to filtration house of swimming pool	Approved	21.11.66
14643/15	For children's playroom	Approved	18.10.66
14643/14	For the alterations to access gates and erection of gate keeper accommodation	Approved	2.6.66
14643/13	For a boathouse adjacent to the lake	Approved	2.6.66
14643/12	For a cycle shed and crate store	Approved	3.5.66
14643/11	For the demolition of 10 single chalets and erection of 23 chalets and cloakroom accommodation	Approved	6.5.66
14643/10	For extension of storage accommodation for a limited	Approved	28.1.66

	period only terminating 31.10.69		
14643/09	For a petrol filling station with wash down area	Approved	21.12.64
14643/8	For the continued siting of the cedar and clad timber building for a limited period only terminating 31.10.69	Approved	19.10.64
14643/7	For the demolition of 16 chalets and erection of 1 block of 28 chalets with toilet accommodation	Approved	4.9.64
14643/6	For demolition of 20 chalets and erection of 1 block of 28 chalets with toilet accommodation	Approved	4.9.64
14643/5	For the alterations to the dining hall	Approved	24.9.63
14643/4	For the demolition of the existing wooden chalets and erection of 30 chalets in 2 blocks with toilet accommodation on the site	Approved	24.5.63
14643/3	For the extension to the dining hall	Approved	23.11.62
14643/2	For 14 chalets and toilet accommodation	Approved	31.8.62
14643/1	For a block of staff cubicle	Approved	31.8.62
14643	For one chalet block	Approved	17.7.62
12621/4	For 20 chalets	Approved	11.5.61
12621/3	For the demolition of existing chalets and erection of 50 new chalets and ablution block	Approved	11.5.61
12621/1	For a clubroom and bar	Approved	24.2.61
12621	For additions to form a ballroom and bar	Approved	4.8.60
4756/9	For 5 blocks, each of ten chalets and an ablution block to replace existing sub-standard chalets	Approved	20.7.60
4756/8	For 40 chalets and an ablution block	Approved	9.10.56
4756/7	For a sectional timber building for a limited period only terminating 30.6.64	Approved	13.7.59
4756/6	For a new ablution block	Approved	3.11.58
4756/5	For a billiards, television and rest room	Approved	3.11.58
4756/4	for four blocks of chalets	Approved	3.11.58
4756/3	For a buffet and sun terrace	Approved	31.10.58
4756/2	For a shop	Approved	17.4.58
4756/1	For a store and swimming pool infiltration plant house	Approved	5.3.58
4756	For the rebuilding of catering block (kitchen and ancillary offices)	Approved	5.3.58
2669	For 15 chalets	Approved	9.11.53
518	For conversion of 5 air raid shelters into sanitary blocks	Approved	28.2.49
207	For additions and alterations	Approved	31.12.48