

LAND NORTH OF GOLDRING CLOSE AND MY LORDS LANE, EAST OF ST MARGARETS ROAD AND SOUTH OF BEECH GROVE AND HAWTHORNE GROVE, HAYLING ISLAND

OUTLINE APPLICATION FOR 131 OPEN MARKET AND AFFORDABLE DWELLINGS COMPRISING 10 NO. 1-BED FLATS, 1 NO. 2-BED FLATS, 48 NO. 2-BED HOUSES, 49 NO. 3-BED HOUSES, 20 NO. 4-BED HOUSES; PUBLIC OPEN SPACE; CAR PARKING; NEW VEHICULAR ACCESS FROM BEECH GROVE/HAWTHORNE GROVE INCLUDING DEMOLITION OF 1 HAWTHORNE GROVE; NEW PEDESTRIAN AND CYCLE ACCESS FROM ST MARGARETS ROAD INCLUDING DEMOLITION OF 23 ST MARGARETS ROAD.

PLANNING POLICY FRAMEWORK

NPPF paragraphs 14 and 115; CS11, CS12, CS16, CS17, DM8, DM9: Havant Core Strategy 2011. Chichester Harbour AONB Management Plan 2004-2009: BD1: Appendix 3: Policies B1, B2 B3. Chichester Harbour AONB Design Guidelines for New Dwellings and Extensions.

CHICHESTER HARBOUR CONSERVANCY'S COMMENTS

The application seeks outline permission for the erection of 131 dwellings on 2 fields immediately adjacent to the AONB on Hayling Island, some 200 metres west of the Mengham Rytte inlet of Chichester Harbour.

The boundary of the AONB runs along the eastern boundary of the site (this is a public footpath, which also cuts across the middle and part of the west boundary of the site). The site is currently used as pony paddocks and is bounded by hedgerows. It forms part of an undeveloped gap between Goldring Close and Beech Grove which contributes to the rural setting of the AONB by limiting the impact of the built settlement in views from the AONB. The site lies outside the identified development boundary (urban area) and its development is therefore contrary to the principles of Core Strategy Policy CS17. However, the southern field of the two fields the subject of this application was identified as a 'reserve housing site' in the previous Local Plan (2005), to accommodate some 85 dwellings. This policy stated that *'the existing tree cover and the hedge along the northern and eastern boundaries of the site, respectively, would need to be strengthened to prevent the development having an unacceptable effect on the setting of the Chichester Harbour Area of Outstanding Natural Beauty.'*

The application site was included in the Informal Allocations Consultation in June 2012, under one out of the three options for housing sites on Hayling Island. It was labelled as site 'UE16' and objections to its inclusion were made on various grounds by the Conservancy, Natural England, and the RSPB. It was also voted as one of the 'least favourite' options by the local community.

We consider that such a large housing site, which is substantially larger than the site put forward under the previous Local Plan, should continue to be considered through the Council's Allocations Consultation process, which is still running and we understand is due for a further round of consultation next month. This would accord with the Council's 'Planning Policy Position on Speculative Planning Proposals' which states that *'As progress towards the Council's Allocations Plan is well underway with a commitment to embracing local views and involvement, it would be inappropriate to prematurely consider proposals which would thereby remove the opportunity for local input in the decision-making process. Granting planning permission on an ad-hoc basis as opposed to development properly being planned through the Local Plan/LDF system would also fail to consider accurately the cumulative impacts of sites and would make it difficult to secure appropriate development contributions and/or highway improvements. Whilst the draft NPPF advocates a presumption in favour of sustainable development, allowing unallocated sites on an ad-hoc basis could result in less sustainable or locally supported sites being permitted. Importantly it will also result in the credibility of the plan-led system being undermined contrary to the first core planning principle of the draft NPPF that 'planning should be genuinely plan led'.'*

The proposed development would clearly have a significant impact on the landscape in this sensitive location on the edge of the AONB and in close proximity to Chichester Harbour. The Chichester Harbour

AONB Landscape Character Assessment (2005) identifies key issues and sensitivity to change for character area F1 'South Hayling.' It identifies the sensitivity of the landscape as moderate to high and points out that the most sensitive parts are the edges to the minor inlets of Cockle Creek and Mengham Rythe. The Councils 'Landscape Character Assessment Sensitivity Report' (2007) classifies Landscape Character Area (LCA) 31 (Central Hayling Plain), within which site UE16 is located, as having medium-high sensitivity. It points out that this area provides a strong rural hinterland to the north of the settlement and limits the urban influence of the settlement on both harbours. It notes the strong level of intervisibility with the harbours and the wider landscape beyond and therefore concludes that the area has high sensitivity in terms of the wider landscape.

We are concerned that development of this site for 131 dwellings would erode the rural setting of the AONB given the open, rural hinterland character of the area and the views which are obtainable from the water and from the public footpath running along the boundary of the site. There would inevitably be some views of the development from the eastern boundary footpath (AONB boundary), particularly in the winter months given that the trees and hedgerow are deciduous, and clear views from the junction with the footpath running across the site. There are also views of the site from the head of Mengham Rythe itself. The Landscape and Visual Impact Assessment submitted with the application underplays the impacts on these views and relies heavily on the retention and supplementation of the eastern boundary planting. While this would help to limit impacts, it would not entirely shield views of the development as suggested. The submitted 'site sections' show an indicative appearance of the development from within the site, but ignore the proposed appearance as viewed from the AONB. The proposed development, due to its scale and density, would significantly change the character of the area by infilling an undeveloped gap between Gable Head and Mengham, which would inevitably erode the rural setting of the AONB. As such, it would fail to conserve and enhance the special qualities of the AONB as required by Core Strategy Policy CS12 and paragraph 115 of the National Planning Policy Framework. We therefore disagree with the conclusion that *'the development of the proposal site for residential use will compliment surrounding urban land use on three sides without detrimentally affecting the open countryside to the east' and that 'particularly sensitive receptors such as the Chichester Harbour AONB and the surrounding footpaths will not be affected.'*

The site is also only 210 metres away from the head of Mengham Rythe ('My Lords Pond') which is subject to various international nature conservation designations (SPA, SAC, Ramsar) and access to the harbour by foot could be easily achieved by future residents of the 131 proposed houses. Emerging evidence from the Solent Disturbance and Mitigation Project (SDMP) has identified that the majority of walkers using the Harbour footpaths have come from within 1 km. Therefore, evidence suggests that a development of this scale in this location is likely to lead to increased levels of recreational disturbance where residents of the proposed development are afforded easy access to sensitive areas for feeding and roosting birds within the intertidal areas. Given the close proximity to the designated sites, it is highly unlikely that a mitigation package will be effective. Phase III of the SDMP project outlining an avoidance and mitigation strategy will be published in early 2013. In the absence of this strategy, we would draw attention to recent comments on housing developments close to the harbour by Natural England, which stated that *'Research shows that the majority of walkers on the site have come from within 1km. Within this zone it may not be possible to mitigate for recreational impact.'*

Of further concern is the proximity of site UE16 to fields directly to the east which have recently been recorded as being used as refuge areas for Brent Geese. Therefore, development of site UE16 is likely to lead to a direct impact through increased disturbance of the refuge areas. There is also recorded use of the site itself by Brent Geese between 1980 and 2004, however, subdivision and use for horse grazing over the last 10-15 years has reduced its suitability. The application includes an assessment of impacts of Brent Geese and Waders, however, we would question some of the statements made and would disagree with the conclusion of "no likely significant effect". Furthermore, the proposed mitigation put forward, which includes on-site interpretation, a residents pack and a dog control order, is untested and unsecured. The results of Phase III of the Solent Disturbance and Mitigation Project will provide the evidence needed for effective mitigation measures. Without this evidence base, we consider that it would be too much of a risk to the designated sites to grant permission for this development based on the proposed mitigation measures, particularly given the scale and close proximity to the designated sites.

A further issue relates to waste water disposal from the development. We would seek confirmation that the

development would not place an unacceptable burden on the Waste Water Treatment Works and therefore that it would not have an impact on water quality of Chichester Harbour and the designated nature conservation sites due to insufficient capacity.

Overall, aside from the fact that this site should be considered properly through the Allocations Consultation and accompanying Sustainability Appraisal, this development would be detrimental to the rural setting of the AONB by in-filling one of the few remaining undeveloped gaps in South Hayling, and would be likely to be detrimental to nature conservation interests through increased recreational disturbance in Chichester Harbour, as well to nearby fields used by Brent Geese and Waders. Given the above impacts, we have no option but to object to the application.

For all of the above reasons, we recommend that this application is refused.

DATE CONSIDERED

15/10/12

CONSIDERED BY

Chichester Harbour Conservancy Planning Committee.

RECOMMENDATION

The Local Planning Authority is advised that the Conservancy recommends refusal of this application.