

DELEGATED OFFICER REPORT

PROPOSAL	Installation of a permanent toilet facility on golf course.
LOCATION:	Hayling Island Golf Club, Links Lane, Hayling Island, PO11 0BX
REFERENCE NO:	APP/25/00484
APPLICANT:	Hayling Golf Club
APPLICATION TYPE:	Full planning permission
CONSULTATION EXPIRY DATE:	
APPLICATION EXPIRY DATE:	31/07/2025
WARD:	Hayling West
SUMMARY RECOMMENDATION: Approve with Conditions	

1. Site Description

- 1.1 The site lies within Hayling Golf course which is located in the South-West of Hayling Island. The golf course comprises areas of grassed fairways and greens within larger areas of more natural landscape including areas of gorse, native plants and coastal vegetation together with areas of wetland and marsh.
- 1.2 The golf course is within an area designated as a Site of Special Scientific Interest (SSSI) and within a Solent Waders and Brent Goose Strategy Primary Support Area.

2. Planning History

Is there any planning history relevant to the current application?

Yes

APP/17/00275 Construction of a facilities building on the course to provide separate male and female toilets along with a refreshment/shelter area (Approved 09.06.2017). Request to Discharge Conditions 4, 5, 6 and 7 (02.05.2018). Permitted 09/06/2017

Officer Comment: *This planning application is understood to have not been implemented and has now expired. The current application is an alternative more limited provision of the toilet facilities.*

3. Proposal

Installation of a permanent toilet facility on golf course.

4. **Policy Considerations**

In accordance with Section 38 (6) of the Planning and Compulsory Purchase Act 2004, this decision has been taken having regard to the policies and proposals in the National Planning Policy Framework, the Development Plan, and all other material planning considerations identified in the Planning Considerations section of the report.

Havant Borough Council Borough Design Guide SPD December 2011
Havant Borough Council Parking SPD July 2016
Chichester Harbour Management Plan 2024-2025 N/A
Havant Borough Local Plan (Core Strategy) March 2011
Havant Borough Local Plan (Allocations) July 2014
Emsworth Neighbourhood Plan Post Examination Version 2020 N/A
Conservation of Habitats and Species Regulations 2017
Wildlife & Countryside Act 1981
NERC Act (2006)

Havant Borough Local Plan (Core Strategy) March 2011

CS5 Tourism
CS11 Protecting and Enhancing the Special Environment and Heritage of Havant Borough
CS16 High Quality Design
CS17 Concentration and Distribution of Development within the Urban Areas
DM1 Recreation and Open Space
DM10 Pollution
DM8 Conservation, Protection and Enhancement of Existing Natural Features
DM9 Development in the Coastal Zone

Havant Borough Local Plan (Allocations) July 2014

AL1 Presumption in Favour of Sustainable Development
AL2 Urban Area Boundaries and Undeveloped Gaps between Settlements

Listed Building Grade: N/A
Conservation Area: N/A

5. **Statutory and Non Statutory Consultations**

Natural England

Final Comments

Having looked at these proposals, I note that existing roadways will be used for access and screening would reduce visual disturbance impacts. Due to the nature and scale of these works, impacts to the SWBGS site and SSSI would be minimal. I advise that works over the key overwintering months of January and February are avoided if at all possible.

I hope this provides a way forwards with these proposals. If this raises any questions please do get in touch.

Original Comments

SUMMARY OF NATURAL ENGLAND'S ADVICE NO OBJECTION - SUBJECT TO APPROPRIATE MITIGATION BEING SECURED

Natural England considers that without appropriate mitigation the application would:

- damage or destroy the interest features for which Sinah Common Site of Special Scientific Interest has been notified.

In order to mitigate these adverse effects and make the development acceptable, the following mitigation measures are required / or the following mitigation options should be secured:

- Mitigation measures as set out in the Ecological Impact Assessment dated May 2025.
- A Construction Environmental Management Plan should be produced and approved by the district ecologist/biodiversity officer.
- A management and maintenance plan for the proposed septic tank.

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

A lack of objection does not mean that there are no significant environmental impacts. Natural England advises that all environmental impacts and opportunities are fully considered and relevant local bodies are consulted.

Natural England's further advice on designated sites/landscapes and advice on other natural environment issues is set out below.

Further advice on mitigation

Construction Environmental Management Plan (CEMP):

Natural England advises a Construction Environmental Management Plan (CEMP) should be submitted to, and approved in writing by, the district ecologist/biodiversity officer that identifies the steps and procedures that will be implemented to avoid or mitigate constructional impacts on species and habitats. The CEMP should particularly address the following impacts:

- Storage of construction materials, chemicals, vehicles and equipment,
- Waste storage and disposal,
- Noise, visual and vibrational impacts,
- Timings of works to avoid the core wintering period of local bird populations (October-March inclusive),
- Lighting measures to ensure boundary habitats are not luminated,

The approved CEMP should be secured via an appropriately worded condition attached to any planning consent and shall be adhered to at all times, unless otherwise first agreed in writing with the Local Planning Authority.

Septic Tank Waste Management Plan:

The management and maintenance of the proposed septic tank should be produced to mitigate any potential impacts on species and habitats. The plan should be secured via an appropriately worded condition attached to any planning

consent and shall be adhered to at all times, unless otherwise first agreed in writing with the Local Planning Authority.

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 28I (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

HBC Ecologist

Final Comments

This is fine with me – the risk to overwintering birds is negligible given the scale of works and the location.

Officer Comment: *These comments relate to amended condition proposed by planning agent.*

Original Comments

The application is accompanied by an Ecological Impact Assessment (ECOSA, May 2025) which concludes that the application site comprises an existing toilet facility containing concrete paving slabs, a portable WC, and timber screening alongside areas of trampled grassland (this will be acid grassland in this location) and low Gorse scrub. The application form states that the total area of habitat affected by the proposal is less than 25m² and is therefore exempt from mandatory Biodiversity Net Gain (BNG). My review of the proposed site area using GIS mapping confirms that this is correct.

Overall, I am content that ecological impacts will be very limited. It is for the applicant to ensure that they obtain the relevant permission to undertake activities within Sinah Common Site of Special Scientific Interest (SSSI). The ecological assessment includes a series of recommendations for ensuring that any ecological impacts are avoided or mitigated. I am content that these are proportionate.

If you are minded to grant permission, can I suggest that the following condition is added to any permission.

Prior to the commencement of any development activities, a Construction Environment Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The CEMP shall be guided by and incorporate the outline avoidance and mitigation measures within Ecological Impact Assessment (ECOSA, May 2025) with roles, responsibilities and methods clearly detailed. Reason: to protect biodiversity in accordance with the Environment Act 2021, Conservation Regulations 2017, Wildlife & Countryside Act 1981, NPPF, NERC Act 2006 and Policy CS 11 of the Havant Borough Core Strategy March 2011.

Environment Agency

Environment Agency Position

We have no objection to the proposal as submitted.

Advice to applicant The applicant/occupants should phone Floodline on 0345 988 1188 to register for a flood warning, or visit https://www.gov.uk/sign-up-for-flood-warnings. It's a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by telephone, email or text message. Anyone can sign up. Flood warnings can give people valuable time to prepare for flooding – time that allows them to move themselves, their families and precious items to safety. Flood warnings can also save lives and enable the emergency services to prepare and help communities. For practical advice on preparing for a flood, visit https://www.gov.uk/prepare-for-flooding. To get help during a flood, visit https://www.gov.uk/help-during-flood. For advice on what do after a flood, visit https://www.gov.uk/after-flood.
Costal Partners Response: Thank you for consulting with Coastal Partners on the above application, we have no objection in principle to the proposed development and concur with the comments and advice provided by the Environment Agency.
Langstone Harbour Board I refer to the detailed drawings and documents viewed on the Havant Borough Council website concerning the above planning application. The Board's Planning Sub Committee has considered this application and offers NO OBJECTION to the proposal.

6. **Publicity and 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: 5

Number of site notices: 2

Statutory advertisement: Not applicable.

Number of representations received: 1

6.1 One third party supporting comment has been received in relation to the proposal:

I support the application

In accordance with one of the four Strategic Aims of Hampshire County Council – active, healthy lifestyle.

I am confident that the Hayling Island Golf Club will manage the toilet in accordance with the environmental plan submitted.

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 upon the character and appearance of the area
- (iii) Impact upon SSSI/ecology
- (iv) Drainage/Flood risk

(i) Principle of development

7.2 The application site is situated outside the urban area where new development needs to justify its location. In this case the proposal relates to the provision of facilities for members of the existing Hayling Island Golf Club. The development would improve recreational/sporting facilities for the golf club and can be supported and justifies the proposed development outside the built up area.

(ii) Impact upon the character and appearance of the area

7.3 The proposal is to provide a portable style cabin/container for two toilets finished with walls and roof of Vinyl Faced Plasterboard with a white finish. There would also be a cesspit to the front of the unit. The cabin/container would be approximately 2.7m high.

7.4 The site for the proposed development is currently an area surrounded by approximately 2m high fencing which currently encloses two individual portable toilets. The site is relatively well screened and is not visible from beyond the golf course from public viewpoints. The site is surrounded on three sides by gorse bushes and the land rises slightly to the rear of the area. The existing fencing runs to four sides with a gap to either side to provide access to the existing toilets. The top section of the toilet would project approximately 0.7m above the fence screening, however, it is considered that the limited extent of the projection, together with the existing gorse screening to three sides reduce any visual impact to an acceptable level.

(iii) Impact upon SSSI/ecology/BNG

7.5 The site lies within an SSSI and also is within a Solent Waders and Brent Goose Strategy (SWBGS) Primary Support Area. The application has been considered in consultation with Natural England and the Council's Ecologist.

7.6 Natural England have stated that it considers that the development without appropriate mitigation would, *damage or destroy the interest features for which Sinah Common Site of Special Scientific Interest has been notified*. In order to mitigate these adverse effects and make development acceptable Natural England have stated that the following mitigation options should be secured:

- *Mitigation measures as set out in the Ecological Impact Assessment dated May 2025.*

- *A Construction Environmental Management Plan should be produced and approved by the district ecologist/biodiversity officer.*
- *A management and maintenance plan for the proposed septic tank.*

- 7.7 The Council's Ecologist also recommends the imposition of a condition to secure the mitigation measures set out in the Ecological Impact Assessment. The conditions recommended are considered critical to ensure that the SSSI is protected during the works and on an ongoing basis.
- 7.8 With regards to the impacts on the SWBGS Primary Support Area, following a check with the Council's Ecologist the limited scale of the works is not considered to impact the Primary Support Area.
- 7.9 The application form states that the total area of habitat affected by the proposal is less than 25m² and is therefore exempt from mandatory Biodiversity Net Gain (BNG).
- 7.10 Subject to the imposition of appropriate planning conditions it is considered that the development would have a limited and acceptable impact on the SSSI and on site ecology/habitats.

(iv) Drainage/Flood risk

- 7.11 The site is located in Flood Zone 3 and the application is submitted with a Flood Risk Assessment. Appendix 3 of the NPPF provides Flood risk vulnerability classifications and it is noted that *outdoor sports and recreation and essential facilities such as changing rooms* are classed as Water-compatible development. Given that the facilities are linked to an existing golf course, that the site is well screened, ecological impacts are minimised by utilising an existing facility site it is considered that the proposal is appropriately located from a sequential point of view. The site is in an area of sand and gravel and provides suitable infiltration drainage. The proposal includes a cesspit and it is important to ensure that this is maintained and managed to avoid any harmful impacts on the environment / SSSI. A condition is recommended to ensure that this is the case.

8 Conclusions

- 8.1 In conclusion, the principle of development and the provision of toilet facilities to serve the users of the golf course is considered acceptable.
- 8.2 The proposal is considered to have a limited and acceptable impact on the character and appearance of the area.
- 8.3 The site is sensitive ecologically and designated as an SSSI and SWBGS Primary Support Area. Subject to appropriate conditions as recommended by Natural England and the Council's Ecologist the impact on ecology/habitats is considered acceptable. Finally, the proposal can be suitably drained with good infiltration for any run off.
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9. RECOMMENDATION:

That the Development Manager be authorised to Approve with Conditions application APP/25/00484.

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:

Location Plan Drawing No. LOC-01

Site Plan P-01

General Arrangement Drawing Ref 100 Rev P02

Flood Risk Assessment and Drainage Strategy Aqua Callidus Consulting Issue 1 dated 24/06/2024

Ecological Impact Assessment ECOSA Final Document May 2025

Planning Statement Pegasus Group Ref: P24-0476 May 2025

Reason: - To ensure provision of a satisfactory development.

3. Prior to the commencement of any development activities, a Construction Environmental Management Plan (CEMP) that identifies the steps and procedures that will be implemented to avoid or mitigate constructional impacts on species and habitats shall be submitted to and approved in writing by the Local Planning Authority. The CEMP shall be guided by and incorporate the outline avoidance and mitigation measures within Ecological Impact Assessment (ECOSA, May 2025) with roles, responsibilities and methods clearly detailed. The CEMP should particularly address the following impacts:

- Storage of construction materials, chemicals, vehicles and equipment,
- Waste storage and disposal,
- Noise, visual and vibrational impacts,
- Appropriate mitigation measures if works are to take place during the core wintering period of local bird populations (October-March inclusive) with no works to take place during January and February,
- Lighting measures to ensure boundary habitats are not luminated.

The approved details shall be adhered to at all times during the construction/installation period.

Reason: to protect biodiversity in accordance with the Environment Act 2021, Conservation Regulations 2017, Wildlife & Countryside Act 1981, NPPF, NERC Act 2006 and Policy CS 11 of the Havant Borough Local Plan (Core Strategy) 2011.

4. The proposed development shall be carried out in full accordance with the ecological mitigation methods set out in the Ecological Impact Assessment (ECOSA, May 2025).

Reason: to protect biodiversity in accordance with the Environment Act 2021, Conservation Regulations 2017, Wildlife & Countryside Act 1981, NPPF, NERC Act 2006 and Policy CS 11 of the Havant Borough Local Plan (Core Strategy) 2011.

5. Prior to the first use of the Cesspit/Septic Tank to be used in association with the toilet facilities hereby approved a management and maintenance plan for the Cesspit/Septic Tank shall be submitted to and approved in writing by the Local Planning Authority. The Cesspit/Septic Tank shall thereafter be managed and maintained in full accordance with the approved details unless otherwise agreed in writing by the Local Planning Authority.

Reason: to protect biodiversity in accordance with the Environment Act 2021, Conservation Regulations 2017, Wildlife & Countryside Act 1981, NPPF, NERC Act 2006 and Policy CS 11 of the Havant Borough Local Plan (Core Strategy) 2011.

Informatives:

1. The applicant is advised that the proposed work will need to receive SSSI assent from Natural England following the granting of planning permission and prior to the commencement of works.
2. In accordance with paragraphs 186 and 187 of the NPPF Havant Borough Council (HBC) takes a positive and proactive approach and works with applicants/agents on development proposals in a manner focused on solutions by:

- Offering a pre-application advice service, and
- Updating you of any issues that may arise in the processing of your application and where possible suggesting solutions, and,

In this instance:

- Your application was acceptable as submitted and no further assistance was required.

3. The applicant is advised of the following advice received from the Environment Agency:

The applicant/occupants should phone Floodline on 0345 988 1188 to register for a flood warning, or visit <https://www.gov.uk/sign-up-for-flood-warnings>. It's a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by telephone, email or text message. Anyone can sign up.

Flood warnings can give people valuable time to prepare for flooding – time that allows them to move themselves, their families and precious items to safety. Flood warnings can also save lives and enable the emergency services to prepare and help communities.

For practical advice on preparing for a flood, visit <https://www.gov.uk/prepare-for-flooding>.

To get help during a flood, visit <https://www.gov.uk/help-during-flood>.

For advice on what do after a flood, visit <https://www.gov.uk/after-flood>.