

# No Exceptional Case for a Large Scale Tourist Site

## Objection: Visitor Accommodation Need and Policy Compliance

### 1. Misrepresentation of the Chichester Hotel Market Assessment Study

The applicant relies heavily on the *Chichester Hotel Market Assessment Study (March 2025)* to assert a district-wide need for additional visitor accommodation. This reliance is misplaced and materially misleading.

The Study was **explicitly commissioned to assess hotel demand in Chichester city centre**, not the wider rural district. This is made clear repeatedly throughout the report, including in the Executive Summary and Introduction, which state that the purpose of the Study is to assess unmet demand **within Chichester city centre** and to inform regeneration opportunities within that defined urban area.

While the Study includes contextual data for the wider district and a 5-mile radius, this is expressly for **background comparison only** and does not amount to a conclusion that additional hotel or visitor accommodation is required in the countryside or outside settlement boundaries. The Study's own recommendations focus on:

- A shortfall of rooms **within the city centre**
- The need for a **hotel of scale in a central, accessible location**
- Integration with the **Chichester Regeneration Strategy** and identified urban sites.

At no point does the Study conclude that:

- There is an unmet need for large-scale visitor accommodation in rural locations.
- Countryside sites remote from the city or key attractions are suitable or necessary to meet identified demand.
- Demand cannot be met within or adjacent to existing settlements.

The applicant has therefore **extrapolated beyond the Study's findings**, presenting a city-centre-focused assessment as justification for a countryside development. This is not supported by the evidence.

### 2. Failure to Meet the “Exceptional Circumstances” Test in Policy E8

The applicant seeks to rely on Policy E8 (Built Tourism and Leisure Development), which allows large-scale tourism development outside settlements **only in exceptional circumstances**, where there is:

- *An overriding and compelling justification, and*
- *A clear link to a specific feature or location of significant recreation or leisure interest, and*
- *Demonstrated requirement for and compatibility with a countryside location.*

The proposal fails on all three limbs.

**First**, no exceptional circumstances have been demonstrated. A general assertion of visitor growth, or a city-centre hotel shortfall, does not amount to an exceptional case for countryside

development. Such circumstances are neither rare nor unique and are precisely why the Local Plan directs development to settlements and regeneration areas.

**Second**, there is no overriding or compelling justification linked to this site. The application does not identify any unique attraction, heritage asset, landscape feature, or recreational facility on or adjacent to the site that requires accommodation to be physically located here. The site is not integral to any destination in the way required by Policy E8.

**Third**, the applicant has failed to demonstrate why this development must be in the countryside rather than:

- Within Chichester city centre
- On allocated or regeneration sites
- Within or adjacent to existing settlements with services and public transport

The absence of alternative site analysis further undermines any claim of necessity.

Policy E8 sets a deliberately high bar. The proposal does not come close to meeting it.

### **3. Conflict with Countryside Protection Policy (NE11)**

Policy NE11 establishes a strong presumption against inappropriate development in the countryside, allowing only limited forms of development that are genuinely countryside-dependent and compatible with landscape character.

A large-scale hotel and holiday accommodation complex is **not countryside dependent**. The proposal would:

- Introduce an urbanising form of development into a rural landscape.
- Conflict with the intrinsic character, tranquillity, and openness of the countryside
- Set a precedent for further erosion of countryside policy controls.

The applicant has not demonstrated compliance with NE11, nor reconciled the clear tension between NE11 and their reliance on E8.

### **4. Conclusion**

In summary:

- The applicant has **misinterpreted and overstated** the conclusions of the Chichester Hotel Market Assessment Study, which supports additional hotel provision in **Chichester city centre**, not the wider countryside.
- The proposal fails to demonstrate **exceptional circumstances**, an **overriding and compelling justification**, or a **specific locational need**, as required by Policy E8.
- The development is contrary to Policy NE11 and the fundamental spatial strategy of the Local Plan, which seeks to protect the countryside from unjustified large-scale development.

On this basis, the proposal represents a clear departure from the Development Plan and should be refused.