



These responses have been prepared on behalf of the South Downs Land Managers (SDLM), in conjunction with the National Farmers Union (NFU) and Country Land and Business Association (CLA). The consultations were circulated to all SDLM contacts including NFU and CLA members within the South Downs National Park area and their responses have been included along with SDLM, NFU and CLA Officer comments.

### **South Downs National Park Camping and Glamping Technical Advisory Note**

#### **SDNPA Policies and Strategies**

We appreciate that the Camping and Glamping TAN has been produced to help applicants and agents through the process of making a planning application for camping or glamping facilities within the SDNP and tries to provide more clarity as to how to meet Local Plan Policy SD23 Sustainable Tourism as well as identifying other relevant policies and strategies. It is reasonably comprehensive without being overly long. However, we are concerned at the ever-increasing number of Policy documents and Technical Advisory Notes that applicants are being asked to cross reference (at least 11) or additional evidence produced such as WEP, Travel Plans, Parking Capacity Survey, all these add to the bureaucratic burden. There is a danger that the SDNPA is creating more barriers that can only be overcome by expensive consultants who have the time to comb through each point to find "solutions". The key point, that farmers need to find alternative sources of income, is barely acknowledged and the additional requirements will make what is likely to be a marginal project, untenable.

#### **Tourism Strategy**

We note that the document refers to the Tourism Strategy (2015-2020) and provides a link which is helpful. However, on opening this document it has DRAFT across it. Does this mean that it has never been adopted, and as dated 2015-2020 presumably, is it due for review? I would suggest that in the light of COVID and the impact that it has had on the tourism and hospitality businesses that it needs to be reviewed urgently. The tourism and hospitality sectors have probably been hardest hit by Covid restrictions. The Tourism Strategy needs reflect changes in visitor behaviour, take into account the current circumstances and make plans to assist the sector back to full health. In particular, the stated desired to encourage modal shift from private cars to public transport is now unlikely.

#### **Camping and Glamping in the National Park**

The South Downs are a highly valued lowland landscape of national importance, they receive a large number of day visitors (18.4m annually). These landscapes have been created by farmers and landowners over centuries and to whom it falls to maintain and enhance the landscape, wildlife and recreational opportunities that these visitors come to enjoy. Only a small proportion of these visitors stay overnight 641.900 in the National Park, however, their economic contribution is significantly larger than that of day visitors. The provision of camping facilities can unlock the potential to increase visitor spend within the National Park. This does not come through clearly in the document.

## Purposes and Duty

The National Park Authority has a duty to foster the social and economic well-being of communities within the National Park. The Landscape Review published in September 2019 written by Julian Glover made a number of proposals two of which are relevant to this TAN. Proposal 14: National landscapes supported to become leaders in sustainable tourism and Proposal 23: Stronger purposes in law for national landscapes, in particular making the duty to foster social and economic well-being, a third statutory purpose. This second proposal is not mentioned in the Camping and Glamping TAN although Proposal 14 is. This appears to be a significant omission, particularly in the current economic climate. Glover also recommends that National Parks should 'actively connect with all parts of society'. Camping is an ideal way of providing access to the countryside for lower income families. Providing a more positive policy framework which enables landowners to diversify into camping and glamping will assist the SDNPA in delivering its duty and to implement recommendations from the Glover Review.

## The South Downs as a Tourist Attraction

The tourism industry has been hit very hard by COVID restrictions. With the potential lifting of restrictions in the coming months, it is very likely that there will be a significantly increased demand for domestic tourism (staycations) and in particular holidays and short breaks where people can meet outside. Camping and glamping facilities are therefore likely to be in much higher demand than pre-COVID. The incidence of wild-camping after the easing of restrictions after the first lockdown significantly increased, with resultant problems for landowners having to deal with litter left by wild campers and habitat damage from wildfires. No recognition is made of this in the document.

Added to this, as a result of Brexit, landowners have been hit hard by uncertainty over export markets especially of lamb. Sheep grazing is essential in maintaining the high wildlife diversity of chalk downland and similarly cattle in maintaining heathland sites, many of which are Sites of Special Scientific Interest. In order to maintain grazing of these sites, farmers need to be able to diversify their income streams in order to remain commercially viable.

The document does not seem to take into account either of these significant pressures on landowners and their ability to remain commercially viable. Farmers and landowners in the South Downs are resourceful and have always responded quickly to the economic changes, in order that they are able to take advantage of the lifting of restrictions and provide extra camping capacity the planning process needs to be simple and flexible enough to accommodate this. However, the TAN requires significant additional information on top of the planning application, which may be disproportionate to the size of an application for camp site, which are usually by their nature low key and small scale.

## Planning Policy

### SD23 Sustainable Tourism

The reinterpretation of the criterion of Policy SD23 raises some concerns. The Policy itself states that 'Development proposals for visitor accommodation, visitor attractions and recreational facilities **will** be permitted where it is demonstrated that...' However, whilst we would not dispute the desire for well-located and well-designed campsites that are ecologically friendly and sustainable, the wording of the explanations is somewhat less positive and unrealistic in its requirements.

By their nature farms are outside of development areas and in rural locations. Whilst some may be associated with farm buildings others will not be and therefore the provision of electric car hook ups is likely to be prohibitively expensive. Concerns were also raised that applications could be refused for not being located near public transport. Large parts of the National Park have no public

transport. Whilst we appreciate the desire to encourage visitors to leave the car at home, it is probably unrealistic to think that the majority of people who go camping will use public transport to get there. The idea that a family will get on a train or a bus with tents, bikes and all the other camping paraphernalia is totally unpractical. We would like assurances that this reason (no public transport) cannot be used as a sole reason to reject an application.

From the way it is written criterion c) of SD23 and its explanation appear to give the SDNPA carte blanche to refuse any planning application for camping, on the grounds of loss of tranquillity or landscape impact. We would like to see a more positive interpretation. Concerns were also raised by members that some parts of the National Park have severe issues with traffic noise, in particular from motorbikes along the A272 and A32, which make the ability of landowners to set up a campsite untenable. Whilst this may not be something that can be addressed in this TAN, it is something that we would like to see the National Park Authority tackle.

There appears to be a tension between the criteria and within the Tourism Strategy between wanting a camp site to be situated in close proximity to public rights of way and the potential visual impact of development from the rights of way and the desire to locate campsites close to visitor attractions and the need to divert people away from hot spots.

Unsurprisingly the Camping TAN pushes Whole Estate Plans. However, it should not be a requirement of the planning process for the application to be accompanied by a WEP. These are primarily aimed at large estates, whereas farm diversification is frequently carried out by smaller farmers, where margins are much tighter, where a WEP may not be proportionate.

#### Other Local Plan Policies

There appears to be a conflict between policy SD23 and SD40. Under SD23 criterion g iii) is not a requirement if the application satisfies g i) and ii). However, under SD40 Farm and Forestry Diversification it states that a diversification plan must be submitted. For smaller applications and farms this seems excessive.

We would argue that SD34 Sustaining the Local Economy is also relevant and that applications that help to maintain the commercial viability of farms in order to ensure that they can continue to maintain the landscape and which support local supply chains and key to ensuring the continued value of the area.

The camping document refers to the parking document for guidance on provision of car parking and hard standing – however, on reading the parking document, I can find no relevant information in that document other than for hotels. It would be useful to be more specific as to how this SPD is relevant. The LP Policy SD23 makes a point of suggesting electric car hook-up but and cycle storage but makes no mention of e-bike charging facilities, which are a feature in the Parking consultation.

#### CIL

Is the CIL worked out on the area of tents/ glamping pods plus any ancillary buildings or is it worked out on the area of the campsite itself? If the latter this may make any application prohibitively expensive.

#### **Guidance on Parking for Residential and Non-Residential Development SPD –**

Much of this SPD seems irrelevant to rural non-residential development applications, particularly for low key applications such as camping sites. As stated above apart from hotels and hospitality outlets no reference seems to be made in Table 2 to camping or glamping, nor does it seem to cover tourist attractions.

Particular concern was raised about the requirement in 4.2 for electric vehicle hook ups and the applicant having to 'justify with robust evidence' where this is not feasible. The power network needed to lay on facilities in a field suitable for camping are unlikely to exist. The cost of providing EV charging to such sites is very likely to be prohibitively expensive.

It is unclear from footnote 2 in point 4.8 which refers to the definition of Major Development in the Sustainable Construction SPD whether an application for a campsite would be classed as a major development. Whilst it may well be under 1000sqm in terms of tent area and ancillary buildings, it may well as a whole be larger than 0.5ha.

There is a short section at the end, section 10, that deals with public parking but it does not specifically deal with parking at rural beauty spots. In light of Covid and the number of people using rural areas for outdoor exercise and (when not in lockdown) meeting up, the pressure on rural car parks is increasing substantially. If a car park is full, visitors simply park in gateways or on roadside verges, and potentially make agricultural operations difficult. More should be explicitly mentioned about provision of parking at rural beauty spots. We would like to see mention of the ability of landowners being allowed to use the 28 day Permitted Development rules to provide additional car parking to relieve the bottlenecks at tourist hotspots.

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