



Appeal Decision

Site visit made on 16 July 2018

by **S M Holden BSc MSc CEng MICE TPP FCIHT MRTPI**

an Inspector appointed by the Secretary of State

Decision date: 24 August 2018

Appeal Ref: APP/B9506/W/18/3196556

Hoburne Bashley, Sway Road, New Milton BH25 5QR

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Hoburne Ltd against the decision of New Forest National Park Authority.
 - The application Ref 17/00522, dated 31 May 2017, was refused by notice dated 23 October 2017.
 - The development proposed is described as "use of land for siting 41 holiday lodges with a 12 month season".
-

Decision

1. The appeal is dismissed.

Procedural Matters

2. The Council's decision notice and the appeal form describe the development as: "change of use of land for stationing 41 No. holiday lodges; creation of new car parking; new access." I have determined the appeal on the same basis.
3. The Government has published its revised National Planning Policy Framework (revised Framework). I gave the parties an opportunity to comment on the revisions and have taken their responses into account in reaching my decision.

Main Issues

4. The main issues are:
 - a) Whether or not the proposal is a suitable location for static caravans having regard to national and local planning policy for the delivery of sustainable rural tourism;
 - b) the effect of the proposal on the character and appearance of the New Forest National Park.

Reasons

Location of development

5. Hoburne Bashley is a holiday park licensed for the siting of 607 static holiday caravans. It occupies a large site comprising several fields of caravans, along with a wide range of other indoor and outdoor facilities. The holiday park is approached by an access road which divides the site into two distinct parts. Most of the buildings within the central entertainment complex and all the caravans are sited in the area to the north of the access road and a large open area, including a nine-hole golf course, occupies the site's southern part. The

- approach road is lined with mature trees, but gaps between them give glimpses of the open area to the south. The caravans are not visible on approaching the central complex as they are well screened by vegetation.
6. The appeal site is an area of 1.9 hectares adjacent to the access road and central complex occupying almost the full width of the holiday park. It is currently used as a football field, an enclosed dog exercise area and a section of the golf course. A tennis court, which would be retained, divides the site into two.
 7. The holiday park lies within the New Forest National Park. The statutory purposes of the National Park Authority are firstly, to conserve the natural beauty, wildlife and cultural heritage of the New Forest and secondly, to promote opportunities for the understanding and enjoyment of the special qualities of the area by the public. The New Forest National Park is the smallest of all the English National Parks and is already under severe visitor pressure. The Authority's spatial strategy is for development to be concentrated within four defined villages.
 8. Policy CP16 of the New Forest National Park Core Strategy and Development Management Policies DPD 2010 (Core Strategy) supports tourism development where it would not detract from the National Park's special qualities. The New Forest has more holiday parks and camp sites per square kilometre than other National Parks. The Authority has therefore adopted a restrictive approach to extensions of existing sites in order to provide an appropriate balance between the national park purposes. Policy DP18 of the Core Strategy states that extensions to existing holiday parks will only be permitted to enable the removal of pitches from sensitive areas by relocation of part of a site to a less sensitive area adjoining an existing site. Even then, any extension is subject to it complying with a series of criteria.
 9. The appellant considers that Policies CP16 and DP18 are contrary to the revised Framework and therefore conflict with them should be given little weight. It considers the policies are fundamentally flawed because of the restrictive approach they take to holiday parks throughout the National Park, regardless of their location. The most sensitive areas of the New Forest have international designations as a Special Protection Area (SPA), a Special Area of Conservation (SAC) and as a Ramsar site.
 10. However, it is not the purpose of a Section 78 appeal to revisit the basis of a policy within an adopted local plan. My role is confined to a consideration of whether or not the policies are consistent with the revised Framework, as required by paragraph 213. According to Paragraph 83 of the revised Framework, planning decisions should support sustainable rural tourism which respects the character of the countryside. Paragraph 172 states that great weight should be given to conserving and enhancing landscape and scenic beauty, wildlife and cultural heritage. It goes on to advise that the scale and extent of development within these designated areas should be limited.
 11. I am therefore satisfied that the Core Strategy's policies are consistent with the revised Framework's approach to the protection of National Parks. I also consider they are consistent with the revised Framework's approach to the rural economy, as they have been subject to examination, and it was concluded that they represent an appropriate balance between National Park purposes.

12. Over the last 18 years Hoburne Bashley has replaced 384 pitches for touring caravans with 226 static caravans. This loss of capacity has been offset by improvements to the quality of the accommodation. The business has been supported by allowing static caravans to be occupied throughout the year. These changes have not resulted in encroachment into the holiday park's open space. The proposal would not restore the site's overall capacity, although it would provide an additional 41 lodges available for use at any time. However, it would introduce new lodges on permanent concrete bases, along with lighting, vehicular access ways and areas of hardstanding for vehicles, into an area of the holiday park that is currently undeveloped. I consider that the use of the land for these purposes would adversely affect the openness of this area, which currently makes a positive contribution to the special qualities of the New Forest, even though it is not subject to any international nature conservation designation.
13. A landscaping scheme for the southern boundary of the appeal site could improve biodiversity and visually separate the proposed development from the remaining open space. However, with the exception of the tennis courts and dog exercise area (previously used as a children's play area), the access road and trees already provide a high degree of separation between the developed and open areas of the holiday park. In any event, landscaping should be used to integrate development into its surroundings rather than simply obscure it from view. In my view, the benefits of any additional landscaping and tree planting would be significantly outweighed by the loss of open space. Consequently, the proposal would not comply with the criteria set out in Policy DP18.
14. I note the appellant's intention to invest in alternative outdoor facilities to replace the football field and improve the range and quality of activities available to visitors. However, other than an aspiration to cluster new play facilities around the central complex, there was no other information to show this could be achieved on the site. In any event, facilities such as archery and a new multi-use games area do not need to be located in a National Park.
15. Provision of additional overnight accommodation would increase the range of facilities available for tourists and servicing the lodges would generate employment. The Core Strategy recognises the importance of sustainable tourism to the local economy. Policy CP16 therefore supports tourism development where it provides opportunities for the understanding and enjoyment of the special qualities of the National Park, subject to a series of criteria. However, as the appeal site is outside one of the four defined villages and occupies 1.9 hectares, the proposal would not be small scale. Neither would it use any existing buildings. Although it would attract overnight visitors, there was no evidence to suggest that it would relieve pressure on more sensitive sites elsewhere. It would therefore fail to comply with Policy CP16.
16. I therefore conclude that the appeal site would not be a suitable location for the siting of static caravans. The proposal would be contrary to Policies CP16 and DP18 of the Core Strategy and the advice of the revised Framework. It would also conflict with the statutory purposes of the New Forest National Park which state that, where there is a conflict between the conservation aims of the first purpose and the recreation aims of the second, greater weight should be given to the first.

Character and appearance

17. The appeal site lies within the Sway Pasture and Residential Settlements Area (Area 18) identified within the New Forest National Park: Landscape Character Assessment (LCA). The area is described as a traditional forest-edge landscape which retains its visual and working links with the nearby Open Forest. Bashley Park is identified as an historic landscape whose condition has already been adversely affected by the holiday park and golf course. Although no assessment of the historic landscape character was provided, the appeal site is part of a larger open area which positively contributes to the character and appearance of this part of the New Forest.
18. The appellant's Landscape and Visual Impact Assessment (LVIA) considers the visual effect of the proposal from various viewpoints beyond the site's boundaries. This assessment demonstrated that the proposal would be well screened and of limited visibility from outside the site. The LVIA therefore suggested that it would not be materially harmful to the wider landscape of the New Forest. However, the primary value of this area is as open space within the holiday park. This would be permanently lost through the development which would encroach into this space, seriously eroding its value as open space, regardless of how the area is used.
19. I therefore conclude that the proposal would be harmful to the open character and appearance of this part of the New Forest National Park. It would conflict with Policies CP2 and DP1 of the Core Strategy which, amongst other things, require development to respect the landscape character.

Other Matter

20. Policies that have been adopted in other National Parks regarding holiday parks and camp sites may be less restrictive and may have been revised since the publication of the Framework in 2012. However, they will have been examined and found to be appropriate in those particular circumstances. They are not relevant to this case.

Planning Balance and Conclusions

21. In view of the nature, scale and setting of the proposal, I consider the proposal would be a major development in terms of Footnote 55 of the revised Framework. However, even if it was not, I have found that the proposal would be contrary to the development plan, arising from its location beyond the existing development within Hoburne Bashley. It would also result in significant and harmful erosion of the open space within the holiday park which contributes to the special qualities of the New Forest.
22. I accept that the Authority has a duty to foster the economic and social well-being of the local community. However, this duty would have been considered alongside other statutory duties as part of the examination of the Core Strategy. This is reflected in Policy CP14 which sets out a balanced approach to supporting the local economy. I acknowledge that there would be economic benefits arising from the development, including additional on-site employment both during and after any period of implementation. It could also encourage additional spending in the local area by visitors. However, I am not persuaded that these limited economic benefits would outweigh the harms I have identified.

23. I therefore conclude that there are no material considerations that outweigh the conflict with the development plan. For this reason, and having regard to all other relevant matters raised, I conclude that the appeal should be dismissed.

Sheila Holden

INSPECTOR