

## Introduction

- 1.1 These comments are made by **GVA** to the questions raised by the Inspectors with regard to Matter 12.8 – Sustainable Tourism – in the Examination of the Draft New Forest National Park Local Plan (NFNPLP). The comments are made behalf of **Away Resorts Ltd**, who operate **Sandy Balls Holiday Village**, and **Hoburne Ltd**, who operate **Bashley Holiday Park** within the New Forest National Park.

### Do policies SP46 and DP47 provide a justifiable and effective approach for the support of sustainable tourism?

- 1.2 Draft policy SP46 seeks to restrict the development of tourist facilities and accommodation to within the four Defined Villages, and to prevent the development and expansion of such accommodation outside those villages unless it is in connection with farm diversification. The same policy states that extensions to existing tourism developments will be considered in accordance with Policies DP45 and DP47.
- 1.3 Draft policy DP47 states that extensions to existing holiday parks, caravan and camping sites will only be permitted to enable the removal of pitches from sensitive areas. This policy is similar to the existing adopted policy DP18, which was justified, some ten years ago. Three reasons are given in justification for policy DP47 which are found in paragraph 8.27.
- 1.4 Firstly, this paragraph states that the New Forest National Park contains over three times the average number of camping and touring caravan bedspaces per square kilometre found in any other English National Park. This is the same justification given for existing policy DP18 which was adopted in 2009. The research upon which this justification was based must therefore now be more than ten year's old, and given the restraint upon new caravan park development, the conversion of camping and touring pitches to fewer static caravan and holiday lodge pitches, and caravan developments permitted in other parks, it is unlikely that the New Forest still has three times as many camping and touring caravan pitches as other National Parks. Therefore, the research used to justify this policy is out of date and therefore the policy cannot be considered sound.
- 1.5 Moreover, this out of date research was based on an audit of camping and touring caravan bedspaces, and did not consider the comparative supply of static caravans and holiday lodges (if it had, it may have found that there were less of these than the average at longer established National Parks), and yet, this supply information has

been used to justify a policy that extends restrictions to static caravan and holiday lodge proposals at existing holiday parks and holiday villages, even though we do not know if that supply is greater than at other National Parks. Therefore, the research that has been used to justify policy DP47 has not considered the supply of the full range of holiday park accommodation and therefore it cannot be considered sound to extend the policy restrictions to a type of accommodation which it has not considered.

- 1.6 In any event, an assessment of comparative supply is not relevant without an assessment of comparative demand. It is not a great surprise that the New Forest has more camping and caravan sites than other National Parks as the demand is likely to be greater due to the immediate proximity of the conurbations of Poole/Bournemouth, Southampton and Portsmouth, together with the relative proximity of Greater London. Other National Parks (excluding the South Downs) are more remote and do not have the same proximity to demand generators in Greater London, which is Britain's largest conurbation by far. Therefore, the research upon which policy DP47 is based is out of date, does not consider the supply of all the types of accommodation it seeks to restrict, nor does it consider the relative demand for any of the tourist accommodation it seeks to restrict. The research is incomplete and therefore provides inadequate justification for the proposed policy.
- 1.5 Secondly, paragraph 8.27 states that the Habitats Regulation Assessment (HRA) of the Local Plan does not rule out a likely significant effect of recreation visits on the integrity of the internationally designated nature conservation sites, which make up over half of the total area of the National Park. This relates to the 56% of the National Park that is internationally designated as Special Protection Area (SPA), Special Area of Conservation (SAC) and RAMSAR sites. However, this does not then justify the restrictions proposed for the whole of the National Park in policies SP46 and DP47. On the contrary, the correct use of this information would be to direct development away from these very sensitive areas to less sensitive areas outside of these international designations. Indeed, the SPA, SAC and RAMSAR designations surround or adjoin the four defined Villages in policy SP46, so a correct interpretation of this information would be to discourage tourism development at these villages. It is certainly not a justification for a policy that prevents the extension of any holiday park or holiday village in the National Park outside the ecologically sensitive areas. Therefore, the HRA is not a sound justification for the constraint on the expansion of holiday parks found in policy DP47.

1.6 Thirdly, paragraph 8.27 states that the New Forest has a higher proportion of unserviced versus serviced visitor accommodation than most other English National Parks. Again, the research behind this assertion at least ten years old and out of date. Traditional hotels have been in decline for many years and many will have closed in National Parks over the last ten years. By contrast there has been a growth in self-catered holiday lodges, particularly in inland rural areas. Even if the New Forest still has a high proportion of unserviced accommodation than other National Parks, this should not be seen as a problem, but rather as a benefit in putting the New Forest more in line with the long term trend away from catered towards self-catered accommodation. In any event, the distinction between serviced and unserviced accommodation is extremely dated and unhelpful. Just because someone stays in 'unserviced' accommodation, such as a holiday lodge, it does not mean that the unit will not need to be serviced by cleaners in the same way as a hotel bedroom. Just because the lodge has its own kitchen, it does not mean that those staying there will eat in all or most of the time. They are just as likely to dine at local pubs and restaurants as anyone staying in 'serviced' accommodation. Therefore, there is no justification for restricting the expansion of holiday parks based on this arbitrary and out of date piece of research and it does not provide a sound justification for policy DP47.

Is the approach consistent with national policy?

1.7 Paragraph 214 of the National Planning Policy Framework published in July 2018 (new NPPF) states that policies in the previous Framework (old NPPF) will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019. The NFNPLP was submitted for examination in May 2018 and therefore the policies of the old NPPF apply. We explained how we considered that draft policy DP47 did not accord with the policies of the old NPPF (and the National Planning Practice Guidance that remains) in our representation on behalf of Away Resorts and Hoburne dated February 2018 which should be available for the Inspectors to review.

1.8 In so far as the policies of the new NPPF may be considered relevant, new NPPF paragraph 80 states that to build a strong competitive economy: "*Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development*". The significant weight that should be

accorded to economic growth is the same as that contained in paragraph 19 of the old NPPF.

- 1.9 Draft Policy DP47 states that extensions to holiday parks will only be permitted to enable the removal of pitches from sensitive areas by the relocation of part of a site to a less sensitive area adjoining an existing site and there must be no increase in the overall site area or capacity. Therefore, any expansion of a holiday park is strictly prevented by this policy, so there is actually no incentive for any operator to carry the costs of relocating pitches from a sensitive area to a less sensitive area. Therefore, not only does policy out of accordance with paragraph 80 or the new NPPF and paragraph 19 of the old, it cannot even achieve its aim of removing pitches from more sensitive areas. This means there is no scope for a proposed holiday park extension to be considered on its own merits. How can it be a sound policy for a hotel in Brockenhurst or Lymington to add additional beds that will bring more visitors to the most sensitive areas of the Forest, but not for a holiday park lying outside such market towns and away from the most sensitive areas.
- 1.10 New NPPF policy 83 states that to support a prosperous rural economy, planning policies should enable: "*sustainable rural tourism and leisure developments which respect the character of the countryside*". This is similar to paragraph 28 of the old NPPF.
- 1.11 There is no flexibility within policy DP47 to support proposals for holiday park developments that would be of benefit to the local economy whilst having no significant adverse impact on the character of the countryside. It is just assumed that all extensions to existing holiday parks will be detrimental to the countryside, landscape and natural environment of the National Park, and that is not necessarily the case.
- 1.12 New NPPF paragraph 84 states that: "*Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements*". This is also similar to paragraph 28 of the old NPPF.
- 1.13 Draft policies SP46 and DP47 seek to restrict holiday accommodation within the tightly drawn boundaries of the existing market towns and to prevent any growth of holiday parks, even if they are in a less sensitive part of the Park, and irrespective of whether the proposal will have any adverse impact on the park. The policies do not accord with paragraph 84 of the new NPPF or paragraphs 28 of the old NPPF.

Summary

- 1.14 In our representations of February 2018 we have suggested amendments to paragraphs 8.27, 8.28 and 8.29, and to Policy DP47 that would make this part of the draft Local Plan justified, sound and in accordance with the old and new NPPF.