

Application No: 21/00129/FULL Full Application

Site: Lower Lepe Camping, Lepe Road, Lepe, Exbury, SO45 1AD

Proposal: Access track to serve campsite and agricultural land

Applicant: Ms Christie, The Cadland Estate

Case Officer: Carly Cochrane

Parish: FAWLEY

1. REASON FOR COMMITTEE CONSIDERATION

Contrary to Parish Council view

2. DEVELOPMENT PLAN DESIGNATION

No specific designation

3. PRINCIPAL DEVELOPMENT PLAN POLICIES

DP2 General development principles
DP47 Extensions to holiday parks and camp sites
SP7 Landscape character
SP17 Local distinctiveness
SP48 The land-based economy

4. SUPPLEMENTARY PLANNING GUIDANCE

Not applicable

5. NATIONAL PLANNING POLICY FRAMEWORK

Sec 12 - Achieving well-designed places
Sec 15 - Conserving and enhancing the natural environment

6. MEMBER COMMENTS

None received

7. PARISH COUNCIL COMMENTS

Fawley Parish Council: Recommend permission

8. CONSULTEES

No consultations required

9. REPRESENTATIONS

9.1 None received

10. RELEVANT HISTORY

10.1 Retention of access track to serve campsite and agricultural land (19/00251) refused on 29 May 2019. Subsequent appeal dismissed on 25 March 2020

11. ASSESSMENT

11.1 The wider application site comprises a large agricultural field, primarily enclosed by hedgerow, with undulating ground levels, rising in the middle and sloping down towards the coastline. Lepe Road, from which the site is accessed, also rises, and therefore views of the site are possible from the highway. The surrounding land to the east, north and west is agricultural in character, comprising large field enclosures, and Lepe Country Park is located immediately to the south. For clarification, at the time of the officer's site visit, there was no physical or other boundary separating the application site from the rest of the agricultural field within which it is located, and the site was read as one planning unit. There were also no agricultural or other structures at the site.

11.2 This application seeks planning permission for the installation of a 610 metre long 'Ecogrid' grass reinforcement system, running from the vehicular access point on Lepe Road, along the southern site boundary, and turning North to adjoin an existing track at the east of the site which links Stanswood Road with Lepe Beach. The proposed track is to serve the temporary campsite use and for agricultural purposes. The width of the track ranges between 2.5 and 9.5 metres.

11.3 The campsite which operates at the site during the summer months benefits from an exemption certificate issued by Natural England under Section 269 of the Public Health Act 1936. This allows camping up to 60 days in a year, however this cannot be for more than 42 days consecutively. The exemption certificate also covers Lepe Meadow (formerly known as Whitefield Meadow), located approximately 1.4km to the north of the application site. The Natural England 60 day license therefore negates the need for planning permission for the temporary campsite.

11.4 By way of background, planning permission was refused in 2019 (19/00251) for a 329 metre long crushed stone/gravelled track. The reasons for refusal were as follows:

"The access track, by virtue of its design, size, layout and

materials, appears as an incongruous and visually intrusive feature within the field which detracts from the agricultural character and pastoral nature of the field, failing to conserve or enhance the surrounding landscape and having a suburbanising and detrimental impact upon the special character of the New Forest National Park. It is a permanent feature within the landscape which serves a temporary campsite and represents an unacceptable and unnecessary development which has an adverse impact upon the character and appearance of the area. The development is therefore contrary to policies DP1, CP8 and CP16 of the New Forest National Park Core Strategy and Development Management Policies DPD (December 2010), the National Planning Policy Framework and the New Forest National Park Landscape Character Assessment."

- 11.5 The Inspector dismissed the appeal on the basis that not only did the access track result in a harmful landscape and visual impact, but also considered the track to be unnecessary for the purposes of agriculture, and inappropriate development in relation to the camping use, and noted that it would be superfluous outside of the 60-day camping license period (and for the period for which the 'Ag bag' was to be used; this has not been mentioned as part of the current application).
- 11.6 The applicant has submitted a copy of the Inspector's decision in relation to 'Norwood House', in East Riding of Yorkshire Council, in support of this application. The Norwood House appeal relates to the change of use of a Listed Building for B1 Office purposes, and the applicant has identified paragraph 34 of the appeal decision as being pertinent to this application; specifically, as it states that "*such systems are commonly used in sensitive setting with success*", "*such systems*" being "*the use of plastic, metal or concrete grids to provide a running surface with grass planted within them to maintain the greenery*", the use of which was suggested by the Inspector in order to significantly reduce the impact of other hard landscaping in order to "*permit the visual continuity of the lawn to a greater degree*". The suggestion to use such a system (being a grass reinforcement system) was to provide the appearance of a lawned area, in order to have a more visually sympathetic appearance within the setting of the Listed Building. The context of the Inspector's comments in relation to the Norwood House appeal are not transferable or applicable to this application, which is an agricultural field within a National Park, and therefore it is considered that this decision holds little weight in the determination of this application.
- 11.7 The National Planning Policy Framework states that great weight should be given to conserving and enhancing the landscape and scenic beauty in National Parks which have the highest status of protection in relation to these issues. The Environment Act 1995 sets out the statutory purposes of a National Park, the first of these purposes is to conserve and enhance the natural beauty,

wildlife and cultural heritage of the National Park. The New Forest National Park Landscape Character Assessment (2015) identifies the site as lying within Landscape Character 15. The key landscape characteristics of the area are identified as enclosed, well managed agricultural landscape of large regular parliamentary field and large arable fields close to the coast from which there are views over the Solent. Key positive landscape attributes include the strong mosaic of mixed agricultural fields of parliamentary enclosure, with small areas of irregular assarted fields in place (areas of land that have been cleared for agricultural purposes). This document sets out the future landscape management guidelines and stipulates that the landscape's strong field patterns (including irregular assarts) and the landscapes traditional pastoral character are protected.

- 11.8 As with the previous application, it is stated that the need for a permanent track is principally to serve the camping site, and then for the remainder of the year (circa 300 days), it would be used "to provide a better surface for agricultural vehicles traversing the site", although it is evident from the location of the track that the primary purpose is to facilitate easier access for, and make the site more desirable to, the users of the campsite, by also providing access to the existing track to the east, which links directly with Lepe Country Park.
- 11.9 Policy SP46 of the Local Plan states that tourism development will be supported where it provides opportunities for the understanding and enjoyment of the special qualities of the National Park in a way that either enhances, or does not damage, the special qualities. Exempted campsites are exempt from planning control because they are administered by an organisation as low-key sites which have minimal impact on the character and appearance of the locality. The siting of tents for a limited period (no more than 60 days in a year) does not permanently develop the land, or significantly alter its character. This 'light touch' would not be achievable or maintained if permanent structures associated with the use were to be permitted. The principle therefore of permanent features and/or facilities associated with exempted sites, such as the track the subject of this application, is unacceptable. There are many such exempted sites across the New Forest National Park, including another within close proximity to the application site (Lepe Meadows) operated by the same organisation which could make similar arguments in favour of providing permanent facilities, leading to the proliferation of buildings and the cumulative suburbanisation and erosion of the special qualities of the New Forest National Park.
- 11.10 Policy DP47 of the Local Plan places restrictions on when new campsites and extensions to existing campsites would be supported. Paragraph 8.27 of the supporting text recognises that the New Forest National Park is already under considerable

recreational pressure, and has a higher proportion of unserviced accommodation (such as the exempted campsites) versus serviced accommodation than most other English National Parks. Paragraph 8.28 identifies that although many sites, such as that at Lower Lepe for which this application is related, are seasonal, they can have a significant impact on the New Forest Environment, and proposals for ancillary developments to support seasonal campsites, such as hardstandings and toilets, will not be viewed favourably. It is also noted that in the long term, it would be of benefit to reduce the overall number of camping and caravan pitches in the most sensitive areas. The Inspector considered a permanent access track to be an example of such ancillary development which, as it would only have a temporary use with a short-lived existence during the calendar year, is not supported by policy, whilst also having an enduring physical impact on the field when the campsite is not in use.

- 11.12 It is not disputed that the proposed use of an Ecogrid system would have a softer appearance than that of the previous gravel track, on the basis that it would not appear as incongruous or visually intrusive within the context of an agricultural field. The level of harm in comparison to a gravel track is therefore lessened. However, it would still result in a permanent development. The purpose of the track is to formalise part of a large parliamentary field with a feature that would not normally exist, and would therefore appear out of character. The track would therefore represent an incongruous feature which not only constitutes inappropriate ancillary development in relation to an exempted campsite, but detracts from the agricultural character and identified historic field pattern. The principle of any form of hardstanding to serve the campsite is therefore not supported, irrespective of the proposed material, scale or siting.
- 11.13 The applicant sets out that the Ecogrid system can "easily be removed at any time, and the ground restored to its previous condition", which infers a more temporary arrangement. However, a temporary permission has not been applied for, and notwithstanding this, it is not considered that any development in association with an exempted campsite which requires planning permission would be appropriate as it would still be considered as an 'ancillary development' which is not supported by policy. Further, Policy SP7 of the Local Plan confirms the importance of protecting the landscape and scenic beauty of the National Park, requiring development to be informed by the New Forest National Park Landscape Character Assessment and ensuring that they are compatible with the distinct features and type of landscape in which the development is located.
- 11.14 Whilst it is stated by the applicant that for the remainder of the calendar year (outside the 60 days when the site would be used as an exempted campsite), the track would be used to provide a better access for agricultural vehicles, no further detail is provided

as to the essential agricultural need for the track, and why agricultural activity cannot take place without it. The Inspector in the appeal decision noted that whilst the previous track would "be a harder and smoother surface that will likely assist vehicle manoeuvres, modern farm machinery and vehicles are designed to travel across fields and often over more challenging terrain than the appeal site, and as such I see no reason why a dedicated hard surfaced track will be required for the loading and unloading of the stored crop within the Ag-Bag (temporary storage system for cut crops). Although rutting may occur on a grass track, the field has shown it can regenerate from vehicle movements, while alternative or temporary, less harmful access arrangements could be put in place to reduce the impact on the soil." It is noted that the 'Ag-Bag' was not in-situ at the time of the officer's site visit (early March). The Inspector did not consider that the camping and Ag-Bag (agricultural) use would fail to function without the access track, nor would the absence of a track affect the local employment and produce benefits associated with these activities. It was also noted that "failing to provide a dedicated access track would suggest that similar tourism and farming practices would not succeed without one". It is not therefore considered the track would be reasonably required for agricultural purposes.

- 11.15 To conclude, the principle of the provision of a permanent access track to serve the temporary use of the campsite is not considered necessary or appropriate. Further, insufficient evidence has been submitted to demonstrate the need for such a track for genuine agricultural purposes. The track, despite its grassed appearance, would remain a permanent feature within an agricultural field, which would be visible from outside the site and serve to highlight the presence of the temporary campsite use, outside of the exempted period. It would therefore appear as an incongruous feature, unrelated to the wider character and appearance of the agricultural field.

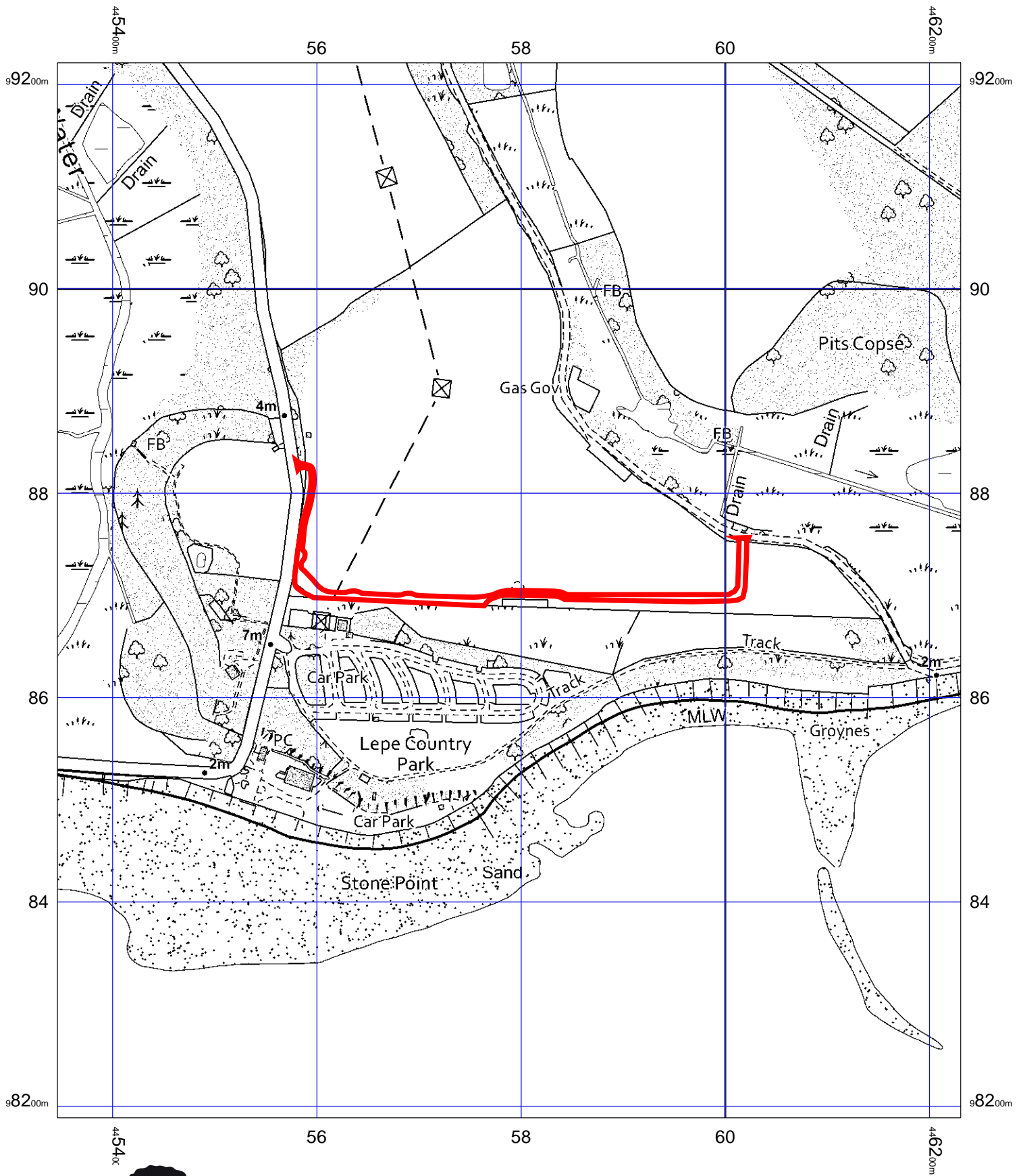
12. RECOMMENDATION

Refuse

Reason(s)

- 1 The principle of an access track, which represents a permanent ancillary development associated with a seasonal campsite, is not considered acceptable or appropriate. The track is also unjustified in relation to agricultural activity. Further, the size of the track, which traverses the breadth of the agricultural land, dissects and detracts from the historical landscape character, and notwithstanding the use of a grass reinforcement system, would appear as an incongruous feature outside of the exempted camping use. The development is therefore contrary to policies DP2, DP47, SP7 and SP46 of the New Forest National Local Plan

2016-2036 (August 2019); the National Planning Policy Framework, and; the New Forest National Park Landscape Character Assessment.



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