



# Landford Parish Council: Planning Schedule

15 December 2021

New Forest National Park Authority (NFNPA) applications: can be viewed on their website, or at their Planning Dept in Lymington.  
Wiltshire Council (WC) applications: can be viewed on their website, or at their Planning Dept in Salisbury.

Application no.	Site address	Proposal	Decision
21/00991 (NFNPA)	Whitegates, Forest Road, Nomansland, Salisbury, SP5 2BW	Timber framed covered seating area	The Parish Council unanimously recommend PERMISSION, for the reasons listed below, but would accept the decision reached by the National Park Authority's Officers under their delegated powers. <ul style="list-style-type: none"> <li>The new covered seating area does not appear to have any detrimental effects on the locality.</li> <li>A condition should be added to the planning approval, requiring any additional external lighting outside of the new structure, to be approved before installation.</li> </ul>
21/01028 (NFNPA)	7 Brookside, Landford, Salisbury, SP5 2AD	Single storey extension; 1no. additional window; widen 1no. window	The Parish Council unanimously recommend PERMISSION, for the reasons listed below, but would accept the decision reached by the National Park Authority's Officers under their delegated powers.  The proposals will have little impact on neighbouring properties and the street scene. However, the above recommendation is subject to the following: <ul style="list-style-type: none"> <li>If the proposed additional accommodation requires extra parking facilities, the highway authority or Wiltshire Council should assess whether the existing communal parking arrangements are adequate.</li> <li>No external lighting should be installed without specific permission from the planning authority.</li> </ul>
21/01016 and 21/01017 (NFNPA)	Landford Lodge, Barrows Lane, Landford, SP5 2EH	Repair and refurbishment of listed stables building; external and internal alterations including conversion of first floor to Estate offices; replacement lean-to to rear of the stable building; coach house building consisting of garaging, equestrian and machine storage on the ground floor with flat above; 2no. dwellings; landscaped courtyard; restoration of staddle stone granary and adjacent machine store; cladding; demolition of existing lean-to structure to rear of stable building, 2no. stable buildings  Including application for Listed Building Consent  Observation date 04 January 2022: The case officer has granted an extension so this application will be considered at the Parish Council's meeting 12 January 2022.	
21/00928 (NFNPA)	Camping And Caravan Site, Green Hill Farm, New Road, Landford, Salisbury, SP5 2AZ	Use of land for the siting of 174 holiday lodges (static caravans), which includes the existing 60 holiday lodges on site and 114 in place of the 130 existing touring and camping pitches; 16 Glamping units consisting of 8 safari tents, 4 glamping pods and 4 shepherd huts; central amenities building; greenhouse; 2no tipis; play village; 2no. classroom buildings; cycle hire; fishing hut; petting area; trim trail; pond; extension of existing lake; operational development, including the laying of bases, access roads, parking spaces, paths; recreational areas, including re-wilding project; landscaping.	

Numerous members of the public addressed the Councillors detailing reasons why they object to the planning application; urging the Parish Council to recommend refusal to NFNPA.

On behalf of Green Hill, Raoul Fraser responded to issues raised by members of the public.

Steve Avery (Director of NFNPA Planning) and David Williams (NFNPA Planning Enforcement Manager) clarified points relating to planning law and material considerations given the history of the site and existing consents for Lawful Development

NB abstained from voting; forfeiting her vote.

The Parish Council unanimously recommend REFUSAL for the reasons listed on the subsequent pages.

**Landford Parish Council Consultee Response to Planning Application**  
**21/00928 Camping and Caravan Site, Green Hill Farm, New Road, Landford**

**4. We recommend REFUSAL, for the reasons listed below.**

Due to the expansion of the site area, the proposed structures, accompanying infrastructure, and the use of all the site for all year round accommodation, the application proposals fail to comply with many of the policies within the NFPN Local Plan 2016-2036, as set out below.

**Policy SP1: Supporting sustainable development**

**PC Comments**

The application proposals fail to *'conserve and enhance the natural beauty, wildlife .....of the National Park and its special qualities'*.

The proposals do not;

*'c) enhance the landscape of the New Forest through high quality design and responding to the local distinctiveness of the area'*.

*'d) contribute positively to the built and historic environment of the New Forest'*.

The proposals do;

*'e) .....impact on the integrity of the protected habitats of the New Forest.....'*

**Policy DP2: General development principles**

**PC Comments**

The application proposals fail to *'..... demonstrate high quality design and construction which enhances local character and distinctiveness'*.

The proposals are not;

*'a) ..... appropriate and sympathetic in terms of scale, appearance, form, siting and layout'* and do not;

*'b) ..... respect the natural, built and historic environment, landscape character and biodiversity'*

The proposals do not comply;

*'d) materials ..... are appropriate to the site and its setting'*

The increased activity on the enlarged site would;

*'f)..... result in unacceptable adverse impacts associated with traffic or pollution (including air, soil, water, noise and light pollution)'*

**Policy SP3: Major development in the National Park**

**PC Comments**

It was suggested, at the parish council meeting, that the proposals would be classed as major development, in which case;

*'a) .....the development is not 'needed'*.

*'b) .....the proposals could easily be located outside of the national park.*

*'c) ..... any detrimental effect on the environment and the landscape could be moderated by using the existing site boundaries, the existing number of pitches and the existing time limitations.*

'd)'.....similarly, the detrimental impact on the special qualities of the New Forest National Park could be mitigated by keeping the existing lawful restraints on the site boundaries, number of pitches and time limitations.

'e)'..... the cumulative impact of the development when viewed with other proposals is clearly stated in paragraph 8.27 '..... **the New Forest has a higher proportion of unserved versus serviced visitor accommodation than most other English national parks.**'

#### **Policy SP4: Spatial strategy**

##### **PC Comments**

The proposed site is not within the settlement boundaries of a Defined Village and the application proposals do not fall within any of the a) to e) exceptions to the policy.

#### **Policy SP5: Nature conservation sites of national importance**

##### **PC Comments**

The application site is immediately adjacent to international conservation SPA and SAC areas. With a large increase in activity for the proposed application site and direct access to the sites of international importance, the proposals will not comply with the above policy, which states; ***'Development which may affect the integrity of an internationally important site for nature conservation will not be permitted unless there are imperative reasons of overriding public interest for the development, and there are no alternatives.'***

#### **Policy SP6: The natural environment**

##### **PC Comments**

As described in the **Landford Village Design Statement**, Section 3 The Local Landscape, paragraph 3.10 Landford Common, an undeveloped area is required to link Landford Bog (SSSI and SAC site) to other similar designated sites, in order to retain the vital wildlife corridor.

**Landford VDS - 'GOAL 3.10.1 – Retain the open space across New Road and protect and enhance this vital wildlife corridor to the New Forest.'**

The application proposals fail to accommodate this important feature due to the area of the camping and caravanning site being extended beyond its previous permitted limits.

If, as the application suggests, all pitches for tents and touring caravans can be legitimately changed to a use for static caravans or lodges, the increase in floor areas of each unit will inevitably result in a greater number of holiday makers that can be accommodated. This is contrary to the applicant's claims that the proposals will result in no net increase in visitor numbers residing on site. Add to this the all year round use of all static caravans that is being applied for, and the visitor increase will be significant. As a result of increased visitor numbers, there will be an impact, through greater use, on nearby features of the natural environment, including habitats and species of biodiversity importance.

A tributary of the River Blackwater runs through the site. This joins the main River Blackwater, which then flows into the River Test. This, in turn, flows into Southampton Water and into the Solent. Any pollution from this site, which is partly within a surface water flood zone, would be a disaster for the water environment.

### **Policy SP7: Landscape character**

#### **PC Comments**

The application proposals, by virtue of the site expansion into existing agricultural areas, will clearly not be '*conserving the landscape and scenic beauty of the National Park and to its wildlife and cultural heritage.*' To illustrate the potential harm to the landscape character, an Article 4 direction was made on six hectare plot of land, on another site on Landford Common, which had been divided into 115 separate plots. It was considered that the permitted development rules, allowing plots to be fenced and/or the plots to be used to site caravans for 28 days per year, would seriously harm the landscape character and visual amenities of this part of the National Park.

'a)' The site is located within the Heath Associated Smallholdings and Dwellings area in the 'West Wellow Heaths and Commons' designation of the New Forest National Park Landscape Character Assessment. One of the Overall Landscape Strategies for this area is '*Protect areas of wood pasture and ancient commons, particularly through grazing by commoners' stock. Protect the edge of commons from settlement encroachment .....*'. This will not be achieved by extending the location of static caravans to the edge of Plaitford Common.

'b)' Contrary to this paragraph, the design, layout, massing and scale of proposals does not conserve and enhance existing landscape but it does detract from the natural beauty of the National Park.

'c)' Again, contrary to this paragraph, the character of largely open and undeveloped landscapes between and within settlements will be eroded and have their setting harmed.

### **Policy DP8: Safeguarding and improving water resources**

#### **PC Comments**

As mentioned in the comments to Policy SP6, a tributary of the River Blackwater runs through the site. Unless each pitch is connected individually to the foul drainage system, pollution is likely and this policy must be strictly adhered to.

### **Policy SP9: Green infrastructure**

#### **PC Comments**

'c)' As discussed in comments to Policy SP6, the proposals will result in increased numbers of holiday makers, and these will create more recreational pressure on the adjoining Plaitford Common, which has SSSI, SAC, SPA and Ramsar designations.

### **Policy SP15: Tranquillity**

#### **PC Comments**

The existing site, with the structures that currently exist, has already created levels of noise disturbance to nearby properties. With more man-made structures proposed, the noise and visual intrusion will only increase.

The current, significant light pollution of the existing site has already been experienced from a number of viewpoints. This detrimental impact on the dark night skies can only become worse as more static caravans, roadways, communal structures, etc. are added to the existing.

### **Policy SP17: Local distinctiveness**

#### **PC Comments**

174 static caravans, together with the proposed infrastructure, on a site which, for centuries, was part of Landford Common, but later became just agricultural land, will certainly be considered as eroding the Park's local character. And the suburbanising effect will not be gradual.

### **Policy DP18: Design principles**

#### **PC Comments**

'e)' The proposals are not appropriate for the landscape features in which they are set i.e. agricultural land bordering common land owned by the National Trust.

### **Policy SP19: New residential development in the National Park**

#### **PC Comments**

The application for the proposed static caravans will not contribute to any of the residential dwellings listed in the above policy.

### **Policy SP21: The size of new dwellings**

#### **PC Comments**

Whilst new houses within the National Park are limited to a maximum of 100 square metres floor area (a modest three bedroom property), the maximum size of caravans is 136 square metres. In the absence of conditions restricting floor areas, any or all of the static caravans could be increased in size, up to the maximum 136 square metres, without the need for further planning permission.

### **Policy SP28: Rural exception sites**

#### **PC Comments**

Although the proposed static caravans are not 'housing' in the strict definition of the word, they do provide all the normal residential facilities for families, for 365 days a year. With the recent Rural Housing Needs Survey for Landford Parish establishing a local need for ten affordable homes, no provision has been made to include any of these as part of the proposed development. As a result, tourists needs are catered for in preference to local residents needs.

### **Policy SP42: Business and employment development**

#### **PC Comments**

The applicants claim that more employment will be provided as a result of the proposals while also claiming that the numbers of visitors to the site are being reduced. Reduced site activity resulting in a greater number of jobs is a difficult concept to understand or accept. In terms of the local community, it is more likely that, with the additional holiday homes being added to the site, and the site's holiday season extended, the existing local hotel, holiday lets, and bed and breakfast establishments will suffer a reduction in the use of their facilities, together with the other long established caravan and camp sites in the local area.

## **Policy SP46: Sustainable tourism development**

### **PC Comments**

'a)' The application proposals are not in any of the four Defined Villages. There will be no farming activities on the proposed site, so the development cannot be considered as part of a farm diversification scheme.

'b)' This paragraph refers to '*retaining existing serviced visitor accommodation*' not extending it.

'c)' By virtue of the proximity and direct access to Plaitford Common, the application proposals would not relieve visitor pressures on this internationally and nationally designated nature conservation site.

## **Policy DP47: Holiday parks and campsites**

### **PC Comments**

Without the removal or relocation of existing pitches, extensions to existing holiday parks, caravan or camping sites will not be permitted. An increase in the overall site area is specifically rejected in 'b)'.

Paragraph 8.27 of the NFNPA Local Plan states '*Existing holiday parks and campsites provide significant opportunities to enjoy the special qualities of the National Park. They are well provided for in and around the New Forest and this means that no additional camping facilities (including all forms of self-catering camping and caravan accommodation) are needed.*'

## **Policy SP48: The land-based economy**

### **PC Comments**

The loss of farmland, by the proposed change of use to extend the holiday village, is in complete contrast to all the requirements of Policy SP48. Paragraph 8.30 of the NFNPA Local Plan states '*Whilst providing only a small proportion of local jobs, farming, commoning, forestry and woodland management remain vital in maintaining the land use management practices that help conserve the landscape character and cultural identity of the National Park.*'

With regard to farm diversification, paragraph 8.33 of the NFNPA Local Plan states '*Diversification of a scale or extent which is likely to provide an incentive to reduce the long-term agricultural operation of the land will not be supported.*'

### **Other PC reasons for REFUSAL**

#### **It would be wrong to give any preferential treatment to any business or individual submitting a planning application, no matter how complex**

- a) When a business or individual acquires property within the NFNP their legal advisers highlight any areas of non-compliance with local planning regulations. As an established developer of holiday parks and through legal advice Lovat Parks Ltd would have understood any areas of planning non-compliance and that enforcement action could be started at any time by the NFNPA. This would have been reflected in the price paid.
- b) Businesses and people based in the NFNP expect their planning applications to be judged against established criteria and principles set out within the NFNP Local Plan 2016-2036 (SPs and DPs referred to above) and statutory permitted development rights.

- c) **Criteria:** Property owners in the NFNP are clearly restricted to extending their dwelling to a maximum 30% quoted in DP36. 30.1% will be automatically refused. The benchmark is consistently applied.
- d) DP47 is equally clear that there should be “no increase in the overall site area or site capacity” amongst other criteria for extensions to existing holiday parks. It would be wrong to decline planning applications under DP36 but allow holiday park extensions under DP47 if both are equally measurable.
- e) It is incumbent upon the NFNPA to investigate and commence enforcement action where they are aware that property owners or businesses have either not obtained planning permission for a development or have not complied with the terms and conditions of planning permission granted. This process should be, and to the best of our knowledge has been applied consistently throughout the NFNP. It would therefore be wrong, now that the NFNPA and we are aware of a number of areas of non-compliance at Green Hill Farm to allow this to continue, especially when the NFNPA appear to have started enforcement actions against shepherd huts, infrastructure, etc elsewhere in the NFNP.
- f) It is also recommended that enforcement action be taken for any element of the current development that extends or does not comply with current lawful permissions. Any delay to this process increases the possibility of additional certificates of lawful use coming into force which could potentially restrict the NFNPA’s ability to protect the NFNP in the future.
- g) **Principles:** Other aspects and impacts of planning applications are not as always measurable e.g. pollution, be it light, noise, litter, etc, but the NFNP set out clear expectations in the NFNP Local Plan 2016-2036 and these have already been commented on.
- h) **Ecology first, people second.** In assessing this planning application it is clear the proposed development would have a significant negative impact on the ecology of the NFNP. If no further development were to be permitted over and above that already lawfully granted, it is difficult to see how the ecology (and secondly, the local parish community) would be losing out. So why proceed?
- i) **Commoners.** On a number of previous occasions, holiday visitors and their dogs have caused distress to commoners livestock on the adjacent 'commons'. A greater number of visitors, on an all year round basis as proposed, will only create more incidents of this nature. The physical expansion of the site into existing agricultural land will represent a permanent loss of valuable back-up grazing for commoners animals.

## CONCLUSIONS

The very first statutory duty of the New Forest National Park is '**To conserve and enhance the natural beauty, wildlife and cultural heritage of the area**'. If this conflicts with the second statutory duty - '**To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.**' - then the first duty takes precedence.



Although it can be argued that the number of holiday units has not increased from the current allowances, the proposed change from touring caravans to static caravans, especially with the maximum allowable floor area of 136 square metres, will greatly increase the ground area needed for these numbers. As a result, the previously permitted caravan and camping site is being extended in all directions into undeveloped land, some of which was recently used as agricultural land.

Some of the contradictions between the Green Hill planning application and the policies of the NFNPA Local Plan could, possibly, be dealt with by conditions of a planning permission. However, others have a distinct lack of compliance with the policies, to the extent that a planning refusal can be the only option.