# SOUTH DOWNS NATIONAL PARK



**South Downs National Park Authority** 

Camping and Glamping Technical Advice Note Published July 2021



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#### I. Introduction

- 1.1 This Technical Advice Note (TAN) has been produced to help guide applicants and agents when applying for planning permission for camping and glamping tourism accommodation. This document should be read alongside policies in the South Downs Local Plan (SDLP)<sup>1</sup> and the Partnership Management Plan (PMP)<sup>2</sup>.
- 1.2 The TAN is a material consideration that will be taken into account by decision makers at the Authority and the host authorities<sup>3</sup> when determining planning applications for camping and glamping.
- 1.3 This guidance covers pitch up camping (bring your own tent) and glamping style yurts and domes, eco pods, 'luxury' style canvas tents and treehouses.

## 1.4 The objectives of this TAN are:

- Explain the special qualities of the National Park that attract campers and glampers to the area
- Explain how to make an appropriate planning application for camping or glamping within the sensitive landscape of the National Park
- Explain how to meet Local Plan Policies especially Policy SD23: Sustainable Tourism
- Provide information on permitted development and other planning matters
- Provide further information on sustainable tourism in the National Park

South Downs National Park Authority, 2019, South Downs Local Plan: <a href="https://www.southdowns.gov.uk/wp-content/uploads/2019/07/SD\_LocalPlan\_2019\_17Wb.pdf">https://www.southdowns.gov.uk/wp-content/uploads/2019/07/SD\_LocalPlan\_2019\_17Wb.pdf</a>

<sup>&</sup>lt;sup>2</sup> South Downs National Park Authority, 2020, Partnership Management Plan: <a href="https://www.southdowns.gov.uk/wp-content/uploads/2020/04/SDNP\_PMP\_20-25\_F\_21-FINAL.pdf">https://www.southdowns.gov.uk/wp-content/uploads/2020/04/SDNP\_PMP\_20-25\_F\_21-FINAL.pdf</a>

<sup>&</sup>lt;sup>3</sup> Host Authorities; Winchester District Council, East Hampshire District Council, Chichester District Council, Horsham District Council and Lewes District Council

## 2. Camping and Glamping in the National Park

2.1 Tourism is a vital part of the economy of the National Park. It attracts over 19 million visitors annually, with 46 million visitor days and 641,900 people staying overnight. These visitors spend £464 million in the National Park each year.<sup>4</sup>. The most popular activity in the National Park is walking, followed by visiting a pub/tea room/café and then shopping. Visiting a historic house or garden and wildlife watching are also popular activities. Camping and glamping have risen in popularity recently both nationally and in the National Park, and

evidence shows that glamping businesses, which have opened in the National Park have quickly found a

strong market.

2.2 Day visitors from outside the National Park make up the largest proportion of visitors (39% in both 2018 and 2015) and overnight visitors staying within the park the smallest.

Couples were the most common party type (37%) particularly among staying visitors (47%). Families accounted for 28% of visitors – but they were less likely to be staying visitors (23% of staying visitors described themselves as families). The right application for camping and glamping will help us increase the amount of low cost overnight accommodation in the National Park.

## 2.3 Purposes and Duty

The National Park purposes are:

- 1. To conserve and enhance the natural beauty, wildlife and cultural heritage of the area
- 2. To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public
- 2.4 The SDNPA also has a duty when carrying out the purposes: To seek to foster the economic and social well-being of the local communities within the National Park.
- 2.5 The statutory purposes and duty for national parks are specified in the National Parks and Access to Countryside Act 1949, as amended by the Environment Act 1995. The DEFRA Vision and Circular on English



Thrive

<sup>&</sup>lt;sup>4</sup> Cited from page 31 of the SDNPA Tourism Strategy (2015-2020) from the Tourism Economic Survey (2012/2013): <a href="https://www.southdowns.gov.uk/wp-content/uploads/2020/09/Sustainable-Tourism-Strategy-2015-20.html">https://www.southdowns.gov.uk/wp-content/uploads/2020/09/Sustainable-Tourism-Strategy-2015-20.html</a>

- National Parks and the Broads provides guidance to national park authorities on how to achieve their purposes and duty. The purposes and duty are set out in Figure I as illustrated in the Partnership Management Plan.
- 2.6 The first purpose of the National Park will be given greater weight in a case where there is a significant conflict between the two purposes. This TAN will explain how camping and glamping applications can meet both purposes by providing great places for people to camp or glamp and enjoy the special qualities of the National Park whilst conserving and enhancing its landscape, wildlife and cultural heritage. Camping and glamping development should contribute to the National Park's first purpose. This TAN is especially important now with people choosing 'staycations' over travelling abroad resulting in higher levels of campsite applications.

#### 2.7 The Glover Review

"We want our national landscapes to work together with big ambitions, so they are happier, healthier, greener, more beautiful and open to everyone." – Julian Glover, front page of the Landscapes Review

- 2.8 Published in September 2019, the Landscapes review<sup>5</sup> (also known as the Glover Review) written by Julian Glover was a comprehensive look at protected landscapes. There are 27 proposals listed in the Review. Tourism will play a part in this, as set out in Proposal 14: National landscapes supported to become leaders in sustainable tourism and Proposal 23: Stronger purposes in law for our national landscapes.
- 2.9 National Parks were created in part to provide an open healing space. As our country is "changing fast. It is becoming more diverse. More Urban. Much busier. New forms of farming, carbon emission, the sprawl of housing, new technology and social shifts have changed the relationship between people and the countryside..." (page 7). New campsites in the National Park can provide low-cost and well-designed tourist accommodation. Glover noted the GROW<sup>6</sup> Project that was delivered by the SDNPA eastern area ranger team, on page 99 of his report. By enabling individuals to access the natural environment more regularly, 87% of participants reported a "significant or great benefit to their mental health." A further 63% reporting benefits to their physical health.

<sup>&</sup>lt;sup>5</sup> Julian Glover, 2019, Landscapes Review: National Parks and AONBs:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/833726/landscapes-review-final-report.pdf

<sup>&</sup>lt;sup>6</sup> South Downs National Park Authority, GROW Project: <a href="https://www.southdowns.gov.uk/grow-project-importance-connecting-nature/">https://www.southdowns.gov.uk/grow-project-importance-connecting-nature/</a>

#### 3. The South Downs as a Tourist Attraction

- 3.1 The South Downs National Park is an extraordinarily beautiful part of the country and offers a unique experience for visitors. The National Park covers over 1,600km2 of England's most valued lowland landscapes shaped over millennia by people who lived and worked here. It stretches from the historic city of Winchester to the west, through to Butser Hill and Petersfield, over to the historic county town of Lewes and the iconic Seven Sisters in the east.
- 3.2 The South Downs was designated as a National Park in recognition of its exceptional natural beauty. The special qualities of the National Park can be seen in figure 2, figure 3 provides a snapshot of the National Park with key facts and figures and figure 4 explains that it is an international dark night sky reserve.
- 3.3 In May 2016 the South Downs National Park became the world's newest International Dark Sky Reserve (IDSR). We think our star-studded skies overhead are as valuable as our beautiful rolling landscapes and, with properly dark skies in the South East of England under threat, this is a statement that the skies of the South Downs are worth protecting.
- 3.4 Dark Night Skies are a special quality of the South Downs and benefit both people and wildlife. 'Dark Skies' are generally defined as skies relatively free of light pollution where people can see a clear starry sky and Milky Way. However, the impact of light pollution is not confined to the visibility of stars and a nuisance to humans. Evidence is showing that light can be very disruptive to many species, some mentioned earlier such as bats and birds. In terms of migration, body clocks and ecosystem integrity. Some species need a dark habitat and although the SDNPA wants as many people as possible to enjoy the special qualities but not at the cost of our natural environment.

Figure 4 Dark Night Skies





Figure 3 PMP Info Graphic

#### 4. The Covid-19 Pandemic

- 4.1 We recognise that the Covid-19 pandemic has had an impact on all of our lives. The importance of access to green and natural spaces has never been so important to our communities and visitors to the National Park. Furthermore, we recognise the pressures that this can put on communities, the infrastructure and services. The pandemic has changed the way we live, with restrictions on travel currently<sup>7</sup> decreasing the need and desire to go abroad for our holidays. For many, the SDNP has offered a place of tranquillity and a mental break from living through a pandemic. The desire for staycations has put extra pressure on areas such as the SDNP. Finding the correct balance between our purposes when looking to accommodate visitors has never been more critical and something we want to help with in this TAN.
- 4.2 For further, general information on what the SDNPA is doing in light of the Covid-19 pandemic, please see our website: https://www.southdowns.gov.uk/national-park-authority/our-work/coronavirus-covid-19-update/

<sup>7</sup> This was written in July 2021, when this was the 'current' situation in terms of travel restrictions due to Covid-19.

## 5. SDNPA Policies and Strategies

5.1 This section sets out the policy and guidance that applicants should be aware of when making a planning application.

# 5.2 The Partnership Management Plan (PMP)8

- The PMP sets out the over-arching five-year strategy for the management of the National Park. The Plan sets out strategic themes and 10 outcomes, which set where the National Park would like to be by 2050. Outcomes 5 and 10 relate to camping and glamping:
- Outcome 5: Outstanding Experiences which relate to the National Park for all, improving accessibility and encouraging sustainable transport.
- Outcome 10: Great Places to work which are relevant to strengthening enterprise, increasing destination awareness and promoting sustainable tourism.

## 5.3 South Downs Local Plan (SDLP)9

• The SDLP is the first local plan to cover the National Park in its entirety and establishes the strategic planning policy framework. It is a landscapeled plan that seeks to deliver multiple ecosystem services and sets out how the Authority will manage development over the next 15 years.

#### 5.4 Neighbourhood Development Plans (NDP)

• At a local level, neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community. When an NDP is 'made' (adopted), it becomes part of the development plan for the National Park, and its policies will be used to determine planning applications within the relevant parish alongside the Local Plan and mineral and waste plans. When making a planning application you should check on our website whether there is an NDP for the area: <a href="https://www.southdowns.gov.uk/planning-policy/neighbourhood-planning/neighbourhood-development-plans/">https://www.southdowns.gov.uk/planning-policy/neighbourhood-planning/neighbourhood-development-plans/</a>

## 5.5 Tourism Strategy (2015-2020)<sup>10</sup>

• The Strategy promotes a sustainable approach to the development of tourism, so that visitors can enjoy more of the National Park without compromising its special qualities. It will be reviewed shortly for the next 5-year period. The Strategy identifies four different visitor themes: Adventure, Cultural, Natural and Working Lands.

<sup>&</sup>lt;sup>8</sup> South Downs National Park Authority, Partnership Management Plan: <a href="https://www.southdowns.gov.uk/wp-content/uploads/2020/04/SD">https://www.southdowns.gov.uk/wp-content/uploads/2020/04/SD</a> PMP 2019 F 22-FINAL.pdf

<sup>&</sup>lt;sup>9</sup> South Downs National Park Authority, South Downs Local Plan: <a href="https://www.southdowns.gov.uk/wp-content/uploads/2019/07/SD">https://www.southdowns.gov.uk/wp-content/uploads/2019/07/SD</a> LocalPlan 2019 17Wb.pdf

<sup>&</sup>lt;sup>10</sup> South Downs National Park Authority, Tourism Strategy (2015-2020): <a href="https://www.southdowns.gov.uk/wp-content/uploads/2020/09/Sustainable-Tourism-Strategy-2015-20.html">https://www.southdowns.gov.uk/wp-content/uploads/2020/09/Sustainable-Tourism-Strategy-2015-20.html</a>

# 6. Planning Policy

- 6.1 Strategic Policy SD23: Sustainable Tourism is the main Local Plan policy with which applications for camping and glamping need to comply with, albeit all policies should be read together and attention paid to all relevant ones especially SD2 on ecosystem services. We set out below and explain the criteria of the policy that are relevant to camping and glamping.
- The SDLP is landscape led and sets out a balance between development and the landscape itself. This section of the TAN is to explain how camping may be able to take place in the National Park, in a sustainable way. In the National Park, landscape plays a key role in how a development's location, layout and design should evolve. As part of the evidence for the Local Plan and for planning applications, all applicants should refer to the South Downs Integrated Landscape Character Assessment (SDILCA) I I at the first instance. This tool can be used by communities, and potential developers, to assess the condition of their landscape and attribute value to certain aspects. The update in 2020 provides new descriptive content, assessments of landscape sensitivities, ecosystem services and image based mapping to help people better understand the key characteristics. The distinct character of a site within that landscape can then be understood. The Viewshed Study may also be useful. This document takes 120 of the most widely known views and landmarks in the National Park and maps them using computer modelling to a 35 kilometre distance. These plots of views are called Zones of Theoretical Visibility (ZTVs), which are used to help assess and understand the impact of visible change in the views.
- 6.3 Camping may be able to provide low cost, overnight stays within the beauty of the natural landscape but without harming the beauty and tranquillity for other users. Have in mind the type of visitor you may attract, due to location, for example, nearby long distant pathways for ramblers, or a particular yearly event. It may also be helpful within a proposal to state your target audience, along with seasonality.
- 6.4 Please note that throughout this section the term 'campsite' is used to reflect all tenures and types of camping and glamping. This is used for simplicity but is meant to encompass all types of camping/glamping development.

<sup>&</sup>lt;sup>11</sup> South Downs National Park Authority, South Downs Integrated Landscape Character Assessment 2020: https://www.southdowns.gov.uk/landscape-design-conservation/south-downs-landscape-character-assessment-2020/south-downs-landscape-character-assessment-2020-technical-papers/

<sup>&</sup>lt;sup>12</sup> South Downs National Park Authority, Viewshed Study: <a href="https://www.southdowns.gov.uk/wp-content/uploads/2015/10/Viewshed-Study-Report.pdf">https://www.southdowns.gov.uk/wp-content/uploads/2015/10/Viewshed-Study-Report.pdf</a>

#### 6.4 SD23: Sustainable Tourism

- I. Development proposals for visitor accommodation, visitor attractions and recreation facilities will be permitted where it is demonstrated that:
- a) The proposals will provide opportunities for visitors to increase their awareness, understanding and enjoyment of the special qualities;
- 6.5 The principle of well-designed and thoughtfully located accommodation can help people enjoy the special qualities of the National Park. Campsite owners can provide an informal education to their visitors about the National Park, increasing their sense of guardianship and pride. Campsites could provide activities for children that involve them in the countryside such as wildflower walks, information boards about local public transport, pubs/restaurants, local habitats and the animals that live there, maps of the night sky and stars, local orchards and treasure trails.
  - b) The design and location of the development minimises the need for travel by private car and encourages access and/or subsequent travel by sustainable means, including public transport, walking, cycling or horse riding;
- 6.6 Campsites that are situated close to public transport can reduce the need to drive. Minimising the use of the private car can enhance tranquillity and wider climate change mitigation. Sites that are well linked to Public Rights of Way encourage visitors to walk instead of taking a car to nearby facilities. Sustainable transport should be incorporated into the overall design. Applicants should consider provision of cycle parking, links to Public Rights of Way and electric car hook ups.
- 6.7 However, we do recognise the importance of sites having suitable access, especially for emergency services vehicles. We would encourage applicants to submit information on emergency access as part of a location plan.
  - c) Development proposals will not detract from the experience of visitors or adversely affect the character, historical significance, appearance or amenity of the area;
- New camp sites should not detract from the special qualities of the National park, for example, by significantly lessening tranquillity or appearing prominent in views. Development should enhance the experience for visitors but should take into consideration the wider amenity and character beyond the development boundary. Any development should be sensitively designed, following a landscape-led approach (see Policy SD5: Design). We would also recommend referencing the 2020 SDICLA, and using the typography to guide the development of the site, for example, locating pitches on the lowest parts of the site.
  - d) Development proposals make use of existing buildings, and, if no suitable existing buildings are available, the design of any new buildings are sensitive to the character and setting;

- 6.9 Developments that can make use of or redevelop existing buildings, such as redundant barns will be supported, and reference should be made to Policy SD41: Conversion of Redundant Agricultural or Forestry Buildings. When there are no suitable buildings available for conversion, the design of any new buildings should be sensitive to the overall character and setting of the local vicinity, following a landscape-led approach. More information on what is required can be found in Figure 5.2 of the SDLP (page 45), Policy SD4: Landscape Character and Policy SD5: Design. The Authority is currently preparing a Design Supplementary Planning Document and reference should be made to that once it is adopted.
  - e) Ancillary facilities are not disproportionately large in relation to the rest of the visitor facilities;
- 6.10 Ancillary facilities, 13 such as campsite shops or cafes, should not overtake the development in terms of scale and should be proportionate to the overall development size. Any ancillary facilities especially if permanent should be sited discreetly. Screening or planting may be required to limit any impact and a proliferation of facilities should not occur
  - f) Any proposal does not have an adverse impact on the vitality and viability of town or village centres or assets of community value; and
- 6.11 This is linked to the previous point. Ancillary facilities such as shops and cafes should not compete with shops and cafes in neighbouring town and village centres. Instead, campers and glampers should be encouraged to visit local shops and pubs.
  - g) Where proposals are located outside settlement policy boundaries as defined on the Policies Map, they:
  - i. Positively contribute to the natural beauty, wildlife and cultural heritage of the National Park; and

Policy SD25: Development Strategy identifies a number of settlements across the National Park where the principle of development will be supported and the boundaries of these settlements are shown on the Policies Map. If a site is located outside of the Settlement Policy boundaries, It is deemed as being in the open countryside. Camping and glamping developments out with settlement boundaries must make positive contributions and enhancements to the natural beauty, cultural heritage and wildlife of the National Park in line with its first purpose.

## ii. Are closely associated with other attractions/established tourism uses, including the public rights of way network; or

Part ii relates to the general locality of a proposed site. A site being close to sustainable links such as Public Rights of Way and bridleways is positive, minimising the use of private travel such as cars. Sites that are near to other tourism facilities and attractions means there will probably be increased interest in the site.

<sup>&</sup>lt;sup>13</sup> Ancillary facilities are building(s) that support the function of the primary development. They are not the primary purpose of the site, but are required so the primary purpose can function.

## iii. Are part of farm diversification schemes or endorsed Whole Estate Plans.

#### Farm diversification

- 6.12 The history of the South Downs is linked closely to farming, with centuries of cultivation and management, which have shaped the landscape of the National Park. Medieval sheep farmers grazed the chalk grasslands, creating the conditions for fauna and flora to flourish and delivering multiple Ecosystem Services. Today, 85% of the South Downs is farmed, and farmers have diversified into other enterprises such as tourism, vineyards and producing high quality local produce.
- 6.13 A camping or glamping application that is part of a farm diversification scheme must explain how the proposal fits within the wider agricultural business. Policy SD40: Farm and Forestry Diversification sets out what would be expected from a farm diversification plan, and how the enterprise will contribute to the first purpose of the National Park. It must also explain what the applicant thinks will be the expected gains from diversifying into tourism. Farming is diversifying, and the National Park Authority wants to support farmers in undertaking suitable tourist enterprises. Campsites as part of a wider diversification scheme can work well, by the natural incorporation of education into the daily on-site activities. Farmers have a lot of local knowledge and expertise that can be passed on to visitors, a long with local sourced produce.

## Whole Estate Plans (WEP)

6.14 Policy SD25: Development Strategy says that positive regard will be given to development proposals that are part of a Whole Estate Plan (WEP) that has been endorsed by the Authority. WEPs are documents prepared by individual landowning organisations. They set out the assets of the organisation and the opportunities and threats the organisation may encounter and describe their plans for the future. WEPs may decide to include information on identified opportunities for camping or glamping. A guidance note has been prepared by the Authority on WEPs<sup>14</sup>.

<sup>&</sup>lt;sup>14</sup> South Downs National Park Authority, Whole Estate Plans (WEPs): <a href="https://www.southdowns.gov.uk/planning-policy/whole-estate-plans/">https://www.southdowns.gov.uk/planning-policy/whole-estate-plans/</a>

## Other Local Plan policies

6.15 It is important to note, that although SD23 is a key SDLP policy against which camping and glamping proposals will be assessed, the Local Plan needs to be read as a whole, as there will be other policies that relate to your development proposal. It is not possible to produce an exhaustive list as every location, landscape and site will be different. However, we suggest the following policies alongside SD23 are a good starting point.

## 6.16 SD2: Ecosystem Services

Ecosystem Services are the goods and services that people and society get from the natural environment. Figure 5 highlights some small steps that can be taken to implement and utilise Ecosystem Services. Examples include restoring grassland and using sustainable and locally sourced wood and materials; Reducing and sensitively managing water usage in terms of climate change and wastewater; Looking at what can be done to protect our soils from erosion and degradation and implementation of composting toilets; Avoiding areas of hard standing to increase water infiltration; Small scale, sensitively designed energy production such as solar panels. Hedgerows make an important contribution to landscape character, the historic environment, and ecosystem services. They have an important role, by providing connections between habitats, and need to be managed and maintained. Restoring hedgerows that may have previously been removed to widen fields can enhance heritage assets and provide appropriate natural screening of a campsite. More information on Ecosystem Services can be found in Policy SD2 of the SDLP, the Ecosystem Services Technical Advice Note<sup>15</sup> and, on our website.

# 6.17 SD4: Landscape Character and SD5: Design

These policies set out the requirement for development proposals to adopt a landscape-led approach. This means development should enhance, respect and reinforce the landscape informed by contextual analysis of the local landscape character and built character. Paragraph 5.13 of the SDLP says that the design and layout of proposals should be consistent with local landscape character. Proposals should consider and respond to landscape features and elements, including contours. They should be sited well in the first instance to avoid the need for screening, which could appear incongruous in the landscape. Visual impacts should be considered from relevant vantage points. Design should consider how it can avoid and minimise any urbanising/suburbanising impacts, how it can contribute to connections for people and wildlife, and have regard to functionality and ensure a high quality and sustainable design.

# 6.18 <u>Construction Materials</u>

Glamping applications need to consider carefully materials and design, and how the proposed pods and other structures will fit into the landscape. The National Park Authority favours the use of natural and preferably locally sourced materials wherever possible. We do understand that a wide

<sup>&</sup>lt;sup>15</sup> South Downs National Park Authority, Ecosystem Services Householder TAN: <a href="https://www.southdowns.gov.uk/wp-content/uploads/2018/04/Core-06-Ecosystem-Services-Technical-Advice-Note-householder.pdf">https://www.southdowns.gov.uk/wp-content/uploads/2018/04/Core-06-Ecosystem-Services-Technical-Advice-Note-householder.pdf</a>

variety of cost effective pre-fabricated structures are available and officers would welcome discussions on material and design at the pre-application stages.

## 6.19 SD6: Safeguarding Views

Views are an important aspect of the landscape led approach to design. Policy SD6 seeks to ensure that development does not harm views or landmarks, to encourage conservation and enhancement, the visual integrity, identity and quality. These are all intrinsically important to the Special Qualities and are a part of local character and cultural heritage. The Viewshed Analysis Study<sup>16</sup>, maps 120 of the most widely known views and landmarks across the SDNP. It is important to note that these are not the only important views.

#### 6.20 SD7: Relative Tranquillity

Tranquillity is one of the Special Qualities of the SDNP and is highlighted as a Cultural Service under Ecosystem Services. Tranquillity is considered to be the state of calm, quietude and is associated with a feeling of people. It can have positive impacts (and is sometimes required) for wildlife and habitats. Tranquillity is most prominent in areas of the Western Downs, along with some of the Darkest Night Skies. We understand that certain areas of the SDNP will have a varying degree of Tranquillity. Levels of Tranquillity can be found on this map: <a href="https://www.southdowns.gov.uk/shhh-national-quiet-day/tranquility-map/">https://www.southdowns.gov.uk/shhh-national-quiet-day/tranquility-map/</a>

We would also like to make applicants aware of the NPPF Paragraph 182 "Agents of Change" Principle (redrafted for to Paragraph 186). Noise can have a big impact on the tranquillity of the area, and can affect not only local residents and communities, but wildlife too. As set out in part a of SD23, we would welcome applicants who are granted permission, to set out some guidelines to visitors in regards to lighting and noise.

# 6.21 SD8: Dark Night Skies

In May 2016 the SDNP became the world's newest International Dark Sky Reserve (IDSR)<sup>18</sup>. It means that the SDNPA will seek to protect the dark skies about the National Park as well as the landscape on the ground. Dark Skies are one of the Special Qualities of the SDNP, and Policy SD8 seeks to ensure that that development does not harm the quality of the dark skies. It also encourages enhancement, for the benefit of people and wildlife. Where any application will implement outdoor lighting, all applications must submit a Lighting Assessment<sup>19</sup>. The SDNPA has recently

<sup>&</sup>lt;sup>16</sup> South Downs National Park Authority, Viewshed Study: <a href="https://www.southdowns.gov.uk/planning-policy/south-downs-local-plan/local-plan-evidence-base/evidence-and-supporting-documents/viewshed-analysis/">https://www.southdowns.gov.uk/planning-policy/south-downs-local-plan/local-plan-evidence-base/evidence-and-supporting-documents/viewshed-analysis/</a>

<sup>&</sup>lt;sup>17</sup> Ministry of Housing, Communities & Local Government, National Planning Policy Framework (draft text for consultation): https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/961769/Draft\_NPPF\_for\_consultation.pdf

<sup>&</sup>lt;sup>18</sup> South Downs National Park Authority, International Dark Sky Reserve: <a href="https://www.southdowns.gov.uk/dark-night-skies/what-does-international-dark-sky-reserve-status-mean/">https://www.southdowns.gov.uk/dark-night-skies/what-does-international-dark-sky-reserve-status-mean/</a>

<sup>&</sup>lt;sup>19</sup> Lighting Assessments (SDLP Paragraph 5.63): Where a proposal involves outdoor lighting, a statement will be required to justify why the proposed lighting is required for its intended use and that shows every reasonable effort has been made to mitigate skyglow and light intrusions. This should be accompanied by a computer calculation

updated the Dark Skies Technical Advice Note<sup>20</sup>. The Dark Skies TAN sets out guidance that expands upon Policy SD8 to help applicants submit and assess lighting schemes appropriate to the landscape.

## 6.22 SD9: Biodiversity and Geodiversity

Conserving and enhancing wildlife is part of the National Park's first purpose. Opportunities to achieve net gains in biodiversity should be identified and incorporated into the development proposal. The landscape context is helpful to identify opportunities for net gain, for example restoration of a hedgerow. Consideration should be given to opportunities to conserve and enhance habitat connections, opportunities to restore or create priority habitats and opportunities to protect and support the recovery of protected species. Adverse impacts to biodiversity as a direct or indirect result of development must be considered in the first instance, followed by consideration of robust mitigation for any impacts which cannot be avoided. Information should be provided on how the biodiversity of the site will be managed on an ongoing basis.

#### 6.23 SDII: Trees, woodland and hedgerows

The South Downs is the most wooded national park in England and Wales. The trees and woodland are significant features of the landscape, with a high proportion of ancient and veteran trees. Trees and woodland are a significant asset with regard to ecosystem services, contributing to many supporting, provisioning, regulating, and cultural ecosystem services, including for example carbon storage, biodiversity, air quality, and tranquillity. New planting should be appropriate and contribute to the character of the location. If used correctly trees can offer many ecosystem services and local climate change mitigation.

#### 6.24 SD12: Historic Environment

The Historic Environment and Cultural Heritage are aspects of the landscape that make the SDNP special. Camping and Glamping can provide benefits to visitors and the local economy, but the historic environment and heritage assets are sensitive to change. In some areas relatively small developments may have a significant impact on the cultural heritage. Applicants should seek to explore the relationships between these heritage assets, and the camping and glamping accommodation. Please also see Policy 13: Listed Buildings and Policy 15: Conservation Areas.

## 6.25 SD40: Farm and forestry diversification

As part of an overall diversification scheme, a diversification plan must be submitted that sets out the overall proposed development for the site and how it will positively contribute to Purpose One.

indicating task luminance, uniformity, horizontal values of overspill beyond the property line and vertical luminance values of light intrusion on adjacent property windows. Any statement should be proportionate to the size and likely impacts of the scheme.

<sup>&</sup>lt;sup>20</sup> South Downs National Park Authority, Dark Skies Technical Advice Note (May 2021 Update): <a href="https://www.southdowns.gov.uk/wp-content/uploads/2018/04/TLL-10-SDNPA-Dark-Skies-Technical-Advice-Note-2018.pdf">https://www.southdowns.gov.uk/wp-content/uploads/2018/04/TLL-10-SDNPA-Dark-Skies-Technical-Advice-Note-2018.pdf</a>

#### 6.26 SD48: Climate change and sustainable use of resources

Applicants are strongly encouraged to consider what measures could be incorporated into their proposals. For example, it can be the case that the most sustainable building materials to use are those sourced locally. As suggested in Jill's Campsite on page 12, applicants should think about on-site energy, would the site be on or off grid, water use, retrofitting and having regard to sustainable construction and technologies. We would also like to refer applicants to the recently adopted <u>Sustainable Construction SPD</u>.

In March 2020, the SDNPA adopted a new Climate Change Strategy<sup>21</sup> and Action Plan<sup>22</sup>. The Strategy and Plan confirms the Authority's commitment to address the climate and nature emergencies. We would welcome all applicants to be aware of the Strategy and Plan. Along with these documents, we would welcome reference (if applicable) to the People and Nature Network (PANN)<sup>23</sup>.

#### 6.27 SD53: Advertisements

Advertisements and signage for campsites may be suitable in some locations, however, advertisements must not adversely detract from the location they are sited. Depending on the location, overall size, height, content and lettering, some advertisements do not require a planning application.

<sup>&</sup>lt;sup>21</sup> South Downs National Park Authority, 2020, Climate Change Strategy: <a href="https://www.southdowns.gov.uk/wp-content/uploads/2020/09/SDNPA-Climate-Change-Adaptation-Strategy.pdf">https://www.southdowns.gov.uk/wp-content/uploads/2020/09/SDNPA-Climate-Change-Adaptation-Strategy.pdf</a>

<sup>&</sup>lt;sup>22</sup> South Downs National Park Authority, 2020, Climate Change Action Plan: <a href="https://www.southdowns.gov.uk/wp-content/uploads/2020/09/SDNPA-Climate-Change-Action-Plan.pdf">https://www.southdowns.gov.uk/wp-content/uploads/2020/09/SDNPA-Climate-Change-Action-Plan.pdf</a>

<sup>&</sup>lt;sup>23</sup> South Downs National Park Authority, People and Nature Network: <a href="https://www.southdowns.gov.uk/national-park-authority/our-work/partnership-management/people-and-nature-network-pann/the-people-and-nature-network-a-summary-guide/">https://www.southdowns.gov.uk/national-park-authority/our-work/partnership-management/people-and-nature-network-a-summary-guide/</a>

A. Restored hedgerows to provide ecosystems services, do not interfere with established views and safeguard routes for wildlife and protected species

B. The use of natural and preferably locally sourced materials wherever possible.

C. Sensitive, downward facing, sensor timed lighting

D. Information boards to increase awareness, understanding and enjoyment of the National Park

E. Tree cover of a type which contributes to the landscape character of the area. Supports biodiversity, offers natural shading and a barrier (where appropriate), whilst providing local climate change mitigation.

F. Increasing biodiversity by leaving areas of grass to grow, or grass restoration. Improves tranquillity, connections to nature and carbon storage.

G. Integrating sustainable transport options

H. Using locally and sustainably sourced wood for fire pit

I. Wildflowers contribute to biodiversity and tranquillity

J. Composting toilets with a discreet, sensitively designed solar panel to produce green energy

K. Bird/Bat boxes for local wildlife/biodiversity mitigation

L. Water management; reed beds help filter water before returning to the wider environment. Incorporation of rain gardens or SuDS<sup>24</sup>.

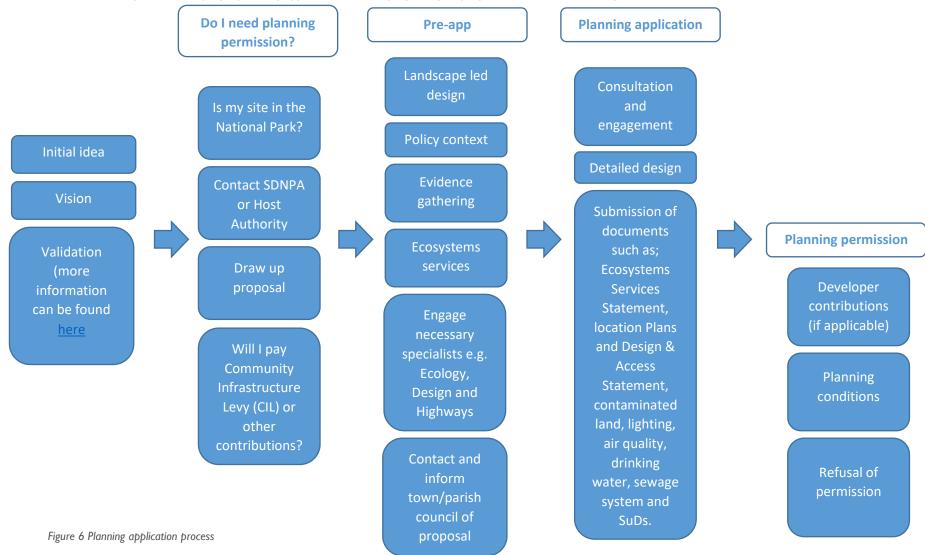


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<sup>&</sup>lt;sup>24</sup> SuDS – Sustainable drainage systems

# 7. The planning application process

7.1 There are various stages in developing a planning application for camping and glamping. These are shown in Figure 6 and discussed further below;



## Do I need planning permission?

- 7.2 Not all camping and glamping schemes will require planning permission, so it is advisable to seek advice from us (or relevant Host Authority) at the earliest opportunity. We would also advise to speak to your local town or parish council.
- 7.3 The SDNPA offers a free service that helps applicants know if their proposal will require a planning application. Please note that this is not pre-application advice that is referred to in the next section. More information on whether you need planning permission can be found here: <a href="https://www.southdowns.gov.uk/planning-applications/do-i-need-planning-permission/">https://www.southdowns.gov.uk/planning-applications/do-i-need-planning-permission/</a>

#### Pre application advice

- 7.4 We would always advise anyone who is thinking of making a planning application for camping or glamping to seek pre-application advice. It is an opportunity for an applicant to receive a professional opinion from the local planning authority on a potential application, and highlight from a planning perspective, any opportunities and concerns the application may bring up. We will also suggest how an application can add value to the National Park.
- 7.5 The website has further useful information on pre-application advice, such as information on benefits, steps and fees.
- 7.6 If you are intending to carry out development work, it is important to contact planning officers and/or to check on the SDNPA website. The best way to submit a planning application in the National Park is online through the Planning Portal Website. Applications will be automatically forwarded to the correct authority. The planning portal website has both interactive forms that can be completed online and forms that can be printed and posted in. Our website does cover aspects of applications such as cost, how applications are decided and how long it will take to decide an application: <a href="https://www.southdowns.gov.uk/planning-applications/apply/">https://www.southdowns.gov.uk/planning-applications/apply/</a>
- 7.7 The correct information should be provided up front so that we can make well informed decisions. As well as mandatory national requirements, the Authority has a set of local requirements, that can be found on the <u>local validation list.</u>

# Permitted development

- Permitted Development (PD) rights refer to work that can be carried out without the need for planning permission. Information on what constitutes PD can be found on the Planning Portal website:

  https://www.planningportal.co.uk/info/200187/your responsibilities/37/planning permission/2
- 7.9 It is the applicant's responsibility to check that a development can be undertaken under PD rights. PD rights are different in national parks to elsewhere in the country so it is always a good idea to check. If you are unsure whether you need planning permission, it is recommended that you submit a 'Do I Need Planning Permission' request in the first instance, or apply for a Lawful Development Proposal for a formal determination as to whether the proposed camping use is lawful without planning permission for a change of use of the land.

In some instances, activities can be carried out for a set number of days a year as explained in the following section.

## 28-day rule (56 day rule until 31 Dec 2021)25

- 7.10 Some minor development can be carried out without the need for planning permission and within the confines of planning law. Even within the National Park, landowners are allowed to use land for camping for up to 28 days within a year, without the need for planning permission. These may be referred to as 'pop-up campsites' where applicants are able to test the concept for a campsite, without seeking permanent use. This option may be more suitable for basic campsites as it would be harder for glamping development to be established in just 28 days. We would always welcome discussions with applicants to discuss temporary use sites. Due to the sensitive nature of the SDNP, small alterations in the landscape can have big impacts on local communities, wildlife and biodiversity and the landscape as a whole.
- 7.11 If indeed planning permission is not required, it is still advisable to contact the relevant Parish or Town Council and neighbours to make them aware of any possible increase in activity on the site. It is important to add, that any landowner exceeding the 28 days in a year may be liable to planning enforcement action or be required to apply for retrospective planning permission. Furthermore, the 28 days will start from when any type of construction starts on site. It is also important to remember that any type of site that requires building, engineering or other operations planning permission will be required.

#### Camping exemption certificates

7.12 A camping exemption certificate under section 269 of the 1936 Act permits the use of any camping ground owned by a recreational organisation (or provided or used by them) to be used for tented camping without the need for a site licence from the local authority. It also permits members of such an organisation to put up tents on any site. A certificate also allows members of the organisation to benefit from the permitted development right under the 1995 Order2 to use the land for the purposes of recreation or instruction, and to erect or place tents on the land for those purposes.

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<sup>&</sup>lt;sup>25</sup> The Government updated the Town and Country Planning General Permitted Development Order regulations, in light of the Covid-19 pandemic. At the start of the pandemic it noted that this was between the dates of 1 July – 31 Dec 2020 a site can be used for additional temporary use for 56 days.. This how now been extended to 31 December 2021. There are still certain circumstances where the 28 day rule may still apply, if a development is within a curtilage of a listed building or a scheduled ancient monument (Part 12A, paragraph A1 b/c).

- 7.13 National parks are named as exemptions for camping certificates. Any organisation that wishes to benefit from a camping exemption certificate need to follow specific guidelines set out in the Natural England guidance<sup>26</sup>. There is also further guidance on camping exemption certificates as set out by Defra<sup>27</sup>. An extract of that guidance can be found here:
- "Camping exemption certificates do not permit caravans to be involved in camping activities. The word "caravan" is defined in the 1960 Act and it includes motor homes and campervans but it excludes tents (and by implication, it also excludes trailer tents). Therefore, tents and trailer tents must be covered by a camping certificate. Organisations that hold camping exemption certificates have considerable freedom in arranging camping facilities for their members. They do not require express planning permission or a site licence from a local authority nor are they required to notify anyone that their members will be camping on a particular site for a particular period of time. We therefore expect holders of exemption certificates to acknowledge that the freedoms they enjoy implicitly carry certain responsibilities.

## **Temporary Permissions**

- 7.15 Temporary permission may be granted by the Authority in cases where the principle of development is on balance deemed acceptable but where there is uncertainty as to the actual effects. Temporary permission allows these impacts to be assessed over a limited period, and if proven to be acceptable, permanent permission may then be applied for.
- 7.16 The flexibility of temporary permission can mean that applicants can assess the viability of a campsite over a period of time, for example, three months of a summer season. We would expect that if the temporary permission was deemed successful by the applicant, permanent permission would be sought. If any issues arose during the period of temporary permission, it should be demonstrated that these are capable of being addressed and overcome.

## Operational months

7.17 Another aspect to consider is the time of year the campsite will be open. Policy SD23 states that the Authority supports a year-round visitor economy, however, camping and glamping is very much a seasonal activity. Applications can consider measures to extend the season, for example providing yurts and shepherd huts as well as camping pitches.

<sup>&</sup>lt;sup>26</sup> Natural England, 2013, Camping and Touring Caravan exemption certificates: A guide for applicants:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/336772/combined-guidance\_tcm6-9572.pdf

<sup>&</sup>lt;sup>27</sup> Defra, 2005, A guide to camping exemption certificates:

7.18 Operational months can affect the viability of a site. Opening a campsite under 28-day PD rights gives the applicant a chance to see if there is interest for extending the opening period. However, full planning permission must be sought for any camping development that will exit for more than 28 days.

## Community Infrastructure Levy<sup>28</sup>

- 7.19 The SDNPA is a 'CIL' (Community Infrastructure Levy) charging authority. Within the National Park you may need to pay the levy if you are undertaking development which creates new residential or retail floor space.
- 7.20 Within the National Park, residential development includes the creation of holidays lets, but not pitches for tents. For example, permanently sited pods and glamping tents may have to pay the levy, but small 'pitch up' style tents would not. Due to recent planning appeal decisions, the SDNPA has taken the view that the 'structure' has to have a greater degree of permanence to be a building that is liable for CIL. Anything that has wheels (whether they are useable or not), or something that could be moved, or is a similar in size to a caravan (as defined in the Caravan Act<sup>29</sup>) will not be counted as a building and therefore not CIL liable.
- 7.21 The charge associated with CIL is, as laid out by Government, non-negotiable and is charged on £ per metres squared. This information is set out in the SDNPA Charging Schedule. For residential within the National Park, there are two geographical 'zones' associated, zone one £150.00 and zone two £200.00 (plus indexation) per square metre. In some cases, these charges may be relevant for tourism/glamping accommodation. Zone one covers the settlements of Liss, Petersfield, Midhurst, Petworth and Lewes. Zone two covers the rest of the National Park. The maps associated with these charges can be found in the SDNPA CIL Charging Schedule.
- 7.22 For more information about CIL, please visit the SDNPA website or the government's website or email cil@southdowns.gov.uk.

<sup>28</sup> South Downs National Park Authority, Community Infrastructure Levy (CIL): <a href="https://www.southdowns.gov.uk/community-infrastructure-levy/">https://www.southdowns.gov.uk/community-infrastructure-levy/</a>

<sup>&</sup>lt;sup>29</sup> UK legislation, The Caravan Sites Act 1968 (Section 29) states: states that the structure must be physically capable of being moved from one place to another by road and that the twin unit must be no more than 20 metres long, 6.80 metres wide and the living accommodation no more than 3.096 metres high.

## **Campsite Provisions**

## Waste Disposal and Campfires

- 7.23 On site facilities will enhance the visitor experience. It is important to take a holistic view and ideally incorporate multifunctional benefits when choosing the layout of a campsite in regards to on-site facilities such as waste disposal, campfires and service provisions. Typically, campsites will be off-grid. Re-using or re-developing established buildings for mixed use purposes, such as for toilet, waste/rubbish facilities are in line with criterion d of Policy SD23 of the Local Plan.
- 7.24 There will be an opportunity to educate visitors on the effects improper waste disposal on surrounding communities and habitats. Waste and litter can do damage to habitats, and animals around the site. Sustainable solutions to waste would be welcomed within an application in line with reduce, re-use, recycle. Bin storage needs to be carefully considered and align with what the local Waste Authority collection service provides. The design and materials of bin storage areas and structures and pick up locations should avoid clutter, be well integrated with and be consistent with the design concept for the site/development.
- 7.25 Campfires in a natural landscape can be a safety hazard if not properly planned or supervised, however, they are intrinsically part of the camping/glamping experience. It would be worthwhile to locate on a map or plan exactly where any fire pits or campfires would be allowed, and explain the mitigations put in place. There is an opportunity to support local farmers/businesses by sourcing firewood and charcoal from sustainable sources. Light of any kind can be harmful to biodiversity, habitats and the integrity of the Dark Night Sky. Light pollution even from smaller sources, placed in the wrong location, can cause disruption for migration and flying routes for bats.
- 7.26 Applicants should also consider where and how waste from campfires, toilets, litter, food waste, petrol/fuel etc. This may also require an Environmental Permit, more information can be found in the last section of the TAN.

## Service provision – Sewage, water and electricity

7.27 Existing underground or over ground utilities, such as sewers or power lines, represent site constraints which the layout needs to accommodate. New utility infrastructure should be located discreetly while maintaining operational integrity. Incorporation of these facilities needs to be mindful of the sensitive landscape of the National Park and of local habitats. Services can be routed along new or existing tracks and new overhead cables should be avoided.

## Car Parking and hard standing

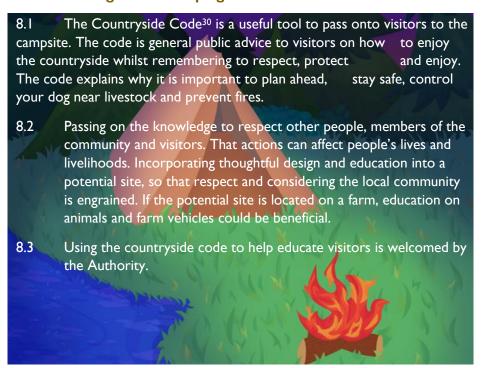
7.28 Car parking design should be well integrated, with good landscape treatment and should avoid a public realm dominated by cars. The use of tarmac and hard standing should be minimised and other options considered such as grasscrete and gravel. Any new tracks should be sensitively routed taking landscape evidence into consideration

- 7.29 If permeable paving is required, applicants should consider how to prevent vehicles from polluting the ground/water environment due to leaks of oil. In general, you should be mindful of ground water vulnerability on the site, and not situate parking in these areas unless it is only on a temporary basis. It is also useful to consider the locality of the site within the wider National Park, and if cars can be seen in long distance views due to glare from windscreens.
- 7.30 Proposals should also refer to the SDNPA Guidance on Parking for Residential and Non-Residential Development SPD.

#### Roads and Lanes

- 7.31 We would also encourage applicants to comply with the guidance document <u>Roads in the South Downs</u>. This document introduces and refines a series of core principles and best practise. We recognise that in 2012, 84% of visitors to the SDNP arrived by car. Furthermore, the Covid-19 pandemic has also had effect on visitors numbers and an effect on the rural roads of the SDNP. It may also effect the reasons why visitors use private transport instead of shared public transport.
- As noted in Part b of Policy SD23, we also recognise the importance of an established access for emergency services, which should be seen by applicants as a priority especially for those very intrinsically rural areas.

#### 8. Good guide to camping







## Wild Camping

- 8.4 Wild Camping is an overarching term, given to camping outside the confines of a campsite, in the open countryside. It is currently unlawful in England. Wild camping is pitching up a tent anywhere in the countryside, without asking consent of the landowner.
- 8.5 Wild camping is not a planning issue, as the person taking part in the activity does not seek planning permission to do so. A campsite cannot be referred to as "a wild camping campsite", because there will be certain rules for being on that site and so it does not fall into that definition of wild camping.

<sup>&</sup>lt;sup>30</sup> South Downs National Park Authority, Countryside Code: <a href="https://www.southdowns.gov.uk/enjoy/countryside-code/">https://www.southdowns.gov.uk/enjoy/countryside-code/</a>

Unsupervised camping can have detrimental impacts on the protected landscape of the National Park with risk of fire and fire damage, unsupervised pets, litter and additional intrusive temporary lighting. We encourage all visitors to follow the Countryside Code.

## **Economic Development Grants**

8.7 Information on Business and Economic Development can be found on our grants and funding page - <a href="https://www.southdowns.gov.uk/national-park-authority/our-communities/grants-and-funding/">https://www.southdowns.gov.uk/national-park-authority/our-communities/grants-and-funding/</a>. There are several links to the different available options and contact details for somebody to talk to at the National Park Authority.

#### **Permits**

- A permit may be required before opening up a camping or glamping site. This may be an Environmental Permit<sup>31</sup> for foul drainage or septic tanks<sup>32</sup>. We would advise that all applicants look at the Government website to check if applicants may need one: <a href="https://www.gov.uk/environmental-permit-check-if-you-need-one">https://www.gov.uk/environmental-permit-check-if-you-need-one</a>.
- 8.9 Applicants who are within the area covered by the draft South East Inshore Marine Plan<sup>33</sup> may need a Marine License. More information can be found here: <a href="https://www.gov.uk/topic/planning-development/marine-licences">https://www.gov.uk/topic/planning-development/marine-licences</a>

<sup>&</sup>lt;sup>31</sup> Government website (Gov UK), Environmental Permits: <a href="https://www.gov.uk/guidance/check-if-you-need-an-environmental-permit">https://www.gov.uk/guidance/check-if-you-need-an-environmental-permit</a>.

<sup>&</sup>lt;sup>32</sup> Government website (Gov UK), Septic tank Permits: https://www.gov.uk/permits-you-need-for-septic-tanks

<sup>&</sup>lt;sup>33</sup> Government website (Gov UK), South East Marine Plans: South East Marine Plans - GOV.UK (www.gov.uk)

#### **Further Information**

South Downs National Park Authority - https://www.southdowns.gov.uk/

Campsite in the South Downs - <a href="https://www.southdowns.gov.uk/where-to-stay/camping-glamping/">https://www.southdowns.gov.uk/where-to-stay/camping-glamping/</a>

NFU - https://www.nfuonline.com/about-us/our-offices/south-east/

Camping and Caravanning Club - https://www.campingandcaravanningclub.co.uk/

National Trust (SDNP) - https://www.nationaltrust.org.uk/days-out/regionlondonsoutheast/south-downs

South Downs Farmers - <a href="http://southdownsfarming.com/">http://southdownsfarming.com/</a>

Countryside Code - https://www.gov.uk/government/publications/the-countryside-code/countryside-code-full-online-version

# List of acronyms

South Downs National Park Authority: SDNPA

Partnership Management Plan: PMP

South Downs Local Plan: SDLP

Neighbourhood Development Plans: NDP

Whole Estate Plans: WEP

Habitats Regulation Assessment: HRA

Community Infrastructure Levy: CIL