SOUTH DOWNS NATIONAL PARK



Camping and Glamping Technical Advice Note (TAN)

Consultation Statement

July 2021

- 1.1 The purpose of the Camping and Glamping Technical Advice Note (TAN) (hereafter referred to as the Camping and Glamping TAN) is to help guide applicants and agents when applying for planning permission for camping and glamping tourism accommodation. Upon adoption, the TAN will be a material consideration that will be taken into account by decision makers at the Authority and the host authorities when determining planning applications for camping and glamping.
- 1.2 This Consultation Statement has been prepared in accordance with Regulation 12(a) and (b) of the Town and Country (Local Development) (England) Regulations 2004. Although technical advice notes are not bound by the same regulations as supplementary planning documents (SPD), we have prepared this note for information purposes and clarity for those who responded to the consultation.
- 1.3 This statement sets out details of the consultation, which has informed and refined the TAN. It sets out details of how, when and with whom the initial consultations with interested parties and organisations took place and how this has informed the TAN.
- 1.4 Following the preparation of the draft TAN, the South Downs National Park Authority (SDNPA) resolved at Planning Committee to undertake a six week consultation between 2 February 16 March 2021. As part of the consultation, the SDNPA:
 - Published the draft TAN on the SDNPA website.
 - Sent emails and letters to our Statutory Consultees (including town and parish Councils), host authorities, tourism specialists including the National Trust, our farm clusters and members of our Agents' Forum.
- 1.5 Consultation responses were received from 52 individuals and organisations. The comments received are summarised in Appendix 1.

 Officer comments relating to the responses received and how the TAN has been amended in response to these are also set out in Appendix 1.

¹ Host Authorities: Winchester District Council, East Hampshire District Council, Chichester District Council, Horsham District Council and Lewes District Council

Respondent List

CGT01 – Waverley Borough Council	CGT22 – Buriton Parish Council	CGT43 – Hampshire County Council
		(Landscape planning, Environmental Initiatives,
		Environmental Department)
CGT02 – Surrey County Council	CGT23 – Individual	CGT44 - Polegate Town Council
CGT03 – Individual	CGT24 – Rogate Parish Council	CGT45 – Marine Management Organisation
CGT04 – Midhurst District Councillor	CGT25 – Individual	CGT46 – CPRE Sussex
CGT05 – Harting Parish Council	CGT26 – Individual	CGT47 – Seaford Town Council
CGT06 - Natural England	CGT27 - Elsted and Treyford Parish Council	CGT48 – Sutton and Barlavington Parish
		Council
CGT07 – Individual	CGT28 – Individual	CGT49 – Murray Planning Associates
CGT08 – Findon Parish Council	CGT29 – The Alice Holt Community Forum	CGT50 – Individual
CGT09 – Holden Farm	CGT30 – Appleton Town Planning	CGT51 – Ditchling Parish Council
CGT10 - Storrington and Sullington Parish	CGT31 – Individual	CGT52 – Individual
Council		
CGTII – Ferring Conservation Group	CGT32 – Cedar Valley	
CGT12 – East Marden Parish Council	CGT33 – West Sussex County Council	
CGT13 – Arundel Town Council	CGT34 – East Marden Parish Council	
CGT14 – Individual	CGT35 – Environmental Agency	
CGT15 – Historic England	CGT36 – Fittleworth Parish Council	
CGT16 - Greatham Parish Council	CGT37 – Patching Parish Council	
CGT17 – Cocking Parish Council	CGT38 – Chichester District Council	
	(Environmental Protection)	
CGT18 – Friends of the South Downs	CGT39 – Individual	
CGT19 – Liss Parish Council	CGT40 – Sompting Estate	
CGT20 – South Downs Land Managers (SDLM),	CGT41 – Bignor Parish Council	
National Farmers Union (NFU) & Country Land		
and Business Association (CLA)		
CGT21 – Bignor Park Estate	CGT42 – Alciston Parish Council	

Appendix I

Draft Camping and Glamping TAN: Summary of comments received February-March 2021:

Individual or	Issue raised	SDNPA response	Proposed action
Organisation			
making the			
Representation			
(Rep Number)			
Waverley Borough Council (CGT01)	No comments to make	N/A	N/A
Surrey County Council (CGT02)	No comments to make	N/A	N/A
Individual (CGT03)	 To include camping/glamping sites have suitable access for emergency services (ambulance, fire, police). Need suitable and non-time consuming vehicular access. Insertion of the above words on page 19. 	Appreciate the suggestion of this wording and will add some words regarding emergency service vehicles.	Add wording and explanation regarding emergency service vehicle access.
Midhurst District Councillor (CGT04)	 No adverse comments to make. Need more access to affordable holiday accommodation, particularly with Covid and overseas holidays are less desirable. Well organised, and well equipped sites sensitively placed are to be commended. 	 Welcome the comments made by the Councillor. Agreed that the extra increase in 'staycations' due to Covid, something that the SDNP will need to closely monitor. 	We will look at the text around accessible affordable holiday accommodation, particularly in relation to Covid.
Harting Parish Council (CGT05)	Support the content of the consultation document	N/A	N/A
Natural England (CGT06)	No comments to make	N/A	N/A
Individual (CGT07)	It is clear that further detailed guidance is required as the current planning system is conflicted.	We welcome the comments that have been put forward. Tourism	Will review the TAN in line with all other comments put forward, to make

	 It is the objective of the SDNPA to increase access to the park. The newly adopted SDLP broadly states that the Park is lacking in a visitor accommodation. Also implies support for farm diversification but has a poor history of approving camping/glamping applications. It is widely considered that the SDNPA is hostile towards this development (even on a small scale). Considerable demand for this type of accommodation will grow after Covid pandemic. In addition, will increase in appeal in the future. Additional visitors would benefit all different areas of the community (shops, pubs, tourist attractions). TANs created must help facilitate good development in line with the visitor and accessibility objectives of the SDNP/SDLP. 	is an area that the National Park Authority is constantly reviewing, and will continue to do so due to the Covid pandemic and subsequent rise in demand for camping accommodation. • We do appreciate the importance of camping/glamping developments being well located in terms of services and facilities. • The intention is that the TAN will aid the facilitation of good camping and glamping development in line with the SDLP and SDNP Partnership Management Plan (PMP).	sure the information is in line with the SDLP, PMP and written to a high standard. • Will review the section on the Covid-19 pandemic to make sure the content is portraying the situation effectively. • Will review the wording on nearby services and tourism having a beneficial impact on the local economy.
Findon Parish Council (CGT08)	Support and welcomes the straight forward content in the TAN	N/A	N/A
Holden Farm (CGT09)	 Well thought out document, all major issues have been covered. Concerns over the 28 day pop up campsites which do not require a license or planning permission. These are gaining in popularity and are detrimental to the SDNP landscape. Other issues including waste and noise can give campsites a bad name. 	 Pleased that respondent believes all main issues have been covered. We appreciate the feedback on the 28 day rule and 'pop up campsites'. We will review the planning information on waste and noise. 	 Will review and add some information and text to the 28 day rule/pop up campsites section. Will also review and add some text to waste and noise.
Storrington and Sullington Parish Council (CGT10)	 Page 9(b) preferred locations near public transport seems difficult to achieve. The suggestion of yurts for extending the season is at odds with policies of using local materials. 	We appreciate that it may not always be possible to locate campsites nearby to public transport, but as an Authority it	We will add further clarity to the section about temporary structures and the 28 day rule.

	 Page 17, the 28 day rule, pop-up sites and temporary structures – more clarity is needed on the applications of the guidance in terms of access, service provision, temp vs permanent structures. Page 20, wild camping is illegal. Didn't notice any comment about support for hostels. Will long term pitch occupation be permitted? TAN says the right things, but unconvinced it will be enforced. TAN notes "well designed" accommodation and protecting natural beauty, wildlife and dark night skies – but surely development in the countryside cannot comply with this. 	 is preferred and located nearby where possible. We will review the section on the 28 day rule, as it has come up frequently in the responses. Thank you for providing some examples. This document is not covering hostels or other types of tourist accommodation, only camping and glamping. However, will take these comments into consideration for the future. We consider that landscape led, well designed and well located accommodation can be located without having a detrimental impact on the special qualities of the SDNP. 	
Ferring	Find the TAN a good balance of encouragement to	N/A	N/A
Conservation	enjoy the National Park responsibly and explanation of		
Group (CGTII)	what is required to do so.		NACH Land B. Land
East Marden Parish	The link on page 16 'do I need planning permission' doesn't work: http://www.southdowns.gov.uk/wp-	Appreciate the information on the	Will update the link to:
Council (CGT12)	content/uploads/2015/01/DINPP-pro-forma.doc	broken link.	https://www.southdowns.gov.uk/planning- applications/do-i-need-planning-permission/
Arundel Town	The Town Council Committee discussed the TAN, and	N/A	N/A
Council (CGT13)	concluded they are in full support of this document.	INA	IVA
Individual (CGT14)	Read document, but confused over where the	This document does not allocate	Will add in/review the section on Car
marviduai (CG114)	environmentally sustainable camping areas are. E.g.,	camping/glamping sites, but to	parking and add a link to the adopted
	what is the size of the accommodation, how will	offer technical advice.	parking and add a link to the adopted

	 they be looked after and will a warden check them regularly? No objection as the landscape is to share. Concerns about increased traffic and parking issues. Local facilities may be put under strain. Good example of where the environmental impact of visitors has been considered. Such as only letting walkers go in one direction, limit the volume. 	 We appreciate the concerns regarding the traffic and parking issues, and will review the text written about this as there is now an adopted Car Parking SPD. We appreciate the comments in regards to 'honey pot' sites and environmental impacts of visitors. It is something to consider but may not be appropriate for this document. 	Car Parking SPD and Roads in the South Downs document.
Historic England (CGT15)	 Welcome the TAN and support its intention to allow for well designed camping and glamping facilities to support the tourism economy of the National Park. Understand such benefits such development may bring, the historic environment and heritage assets are sensitive to change, especially their setting. It may also affect upon the significance of cultural heritage. The TAN should consider the inter-relationship of the objectives for the historic environment with those for the provision of camping and glamping facilities. It could signpost towards historic environment in the SDLP i.e. SD12: Historic Environment. 	 We welcome the comments from Historic England. Appreciate that the TAN does not comment, or give much detail on the historic environment when it should be included especially referencing the SDNP cultural heritage. It was an omission to not include Policy SD12 in the planning policy section. 	We will add in more context around the historic environment, heritage assets and cultural heritage in particular the inter relationship between the historic environment and camping and glamping facilities. In particular by signposting SDLP Policy SD12: Historic Environment.
Greatham Parish Council (CGT16)	The TAN should consider setting a maximum of pitches to avoid overcrowding and adversely impacting biodiversity.	We agree that overcrowding can adversely affect biodiversity. Our development management and	We will add some text to explain what kind of camping and glamping

	 The term 'camping and glamping' includes tents and temporary structures, such as pods etc. Roadgoing caravans, campervans, mobile homes are not mentioned in the document. The document should be explicit on this point. Would welcome a stronger approach to SD48, perhaps stipulating that new sites should be entirely carbon neutral? Reference the Sustainable construction SPD. Description of SD8 could be expanded to make it clearer that different areas are afforded different levels. 	specialist officers are looking at the capacity of the landscape as a first test with a planning application. • We agree that it could be useful to say in the introduction what type of structures are included under the term 'camping and glamping.' • The TAN provides additional guidance on the implementation of Local Plan policies, but cannot set any new policy. That can only be done through a review of the Local Plan. Agree that further clarity could be added in regard to SD8: Dark Night Skies.	 accommodation is covered within the document. This will help with clarity. We will review SD48, and add any further text where relevant. We will review and add further text to the SD8 Policy section, and link the recently published update to the Dark Night Skies TAN.
Cocking Parish Council (CGT17)	No comments to make	N/A	N/A
Friends of the South Downs (CGT18)	 Supports the creation of the TAN and various provisions contained therein. Welcome the requirement that campsites should be, as much as possible, readily accessible by public transport rather than private motor vehicle. As access roads and entrances are sometimes restricted, we would request that access to sites is sufficient to accommodate emergency surface vehicles. 	The representation highlights an important point about emergency vehicle access. This has been raised by other consultees, and we appreciate the importance of this.	We will add in additional text around access in the established access section, or create a new sub section in regards to the importance of emergency services access.
Liss Parish Council (CGT19)	Support the proposed TAN, though we wish to clarify proper planning process and the role of	We appreciate the comments from the Parish Council. We	We will look at adding in some text either in the TAN itself, or on the

	Parish Councils within planning to approve camping & glamping sites. Confusion arises from TAN focus on SDNPA goals of conservation/enhancement of the special qualities. It seems some factors that will sway any permission, rather than if a parish council deems the applicant has complied with NDPs or Local Plans like normal applications.	understand concerns regarding the role of the PC and will look further into adding some context in the document and/or website. • We believe it is indeed possible to incorporate tourist accommodation within the SDNP. It is the role of the TAN to aid the planning application process for these types of developments. If the application is policy compliant then permission will be granted.	website to clarify the role of the Parish and Town Councils.
South Downs Land Managers (SDLM), National Farmers Union (NFU) and Country Land and Business Association (CLA) (CGT20)	 Appreciate that the TAN has been produced to help applicants and agents. With clarity how to meet Policy SD23, as well as other policies and strategies. Concerned that ever-increasing number of Policy documents and TANs that applicants need to cross reference creates a bureaucratic burden. Danger SDNPA is creating more barriers. Key point; farmers need to find alternative sources of income, is barely acknowledged and additional requirements will make it untenable. Note the Tourism Strategy (2015-20) – linked document still has 'draft' written across it. Due to COVID needs to be urgently reviewed. The strategy needs to reflect changes in visitor behaviour. The states desire to encourage shift from private cars to public is now unlikely. 	 We appreciate the detailed response from the SDELM, NFU and CLA. We do appreciate and realise that this is an extra document for applicants to reference. However, this has been done to aid applicants and does not have the statutory weight of the Local Plan and is only a guidance document. We acknowledge that farmers may need alternative income, and the SDNPA are supportive of diversification as is defined in the SDLP. 	 We will speak to colleagues in the Thrive team, and add extra information on the update to the Tourism Strategy if possible. We will review the section on the Glover Review, and add in text to do with Proposal 23. We will review the section on wild camping to make sure it is fit for purpose. We will add extra information for clarity if necessary. We will review the Policy section, in particular SD23 interpretation. The representation comments that SD23giii and SD40 contradict one another, we will review the interpretation in the TAN.

- The highly valued lowland landscape is nationally important and created by farmers.
- Glover Review is mentioned in TAN references Proposal 14 but not 23; "Stronger purposes in law for national landscapes, in particular making the duty to foster social and economic well-being, a third statutory purpose." Should be mentioned in document.
- No recognition in document of problems of wild camping (and the damages) caused after the first Lockdown due to increased demand for staycations. Brexit has also caused uncertainty on export markets.
- Farmers respond quickly to economic changes, so they are able to take advantage of the lifting of restrictions to provide extra camping capacity – the planning system needs to be flexible in order to accommodate this.
- TAN requires extra information on top of the planning application, which may be disproportionate to the size of an application for camp site. Which by nature are small scale.
- SD23 reinterpretation raises some concerns. Agree with sites being ecologically friendly and sustainable, the wording is somewhat less positive and unrealistic in its requirements.
- Comments on the connection between the TAN and WEPs.
- Policy SD23 giii and Policy SD40 contradict one another.

- We also acknowledge the dates of the Tourism Strategy.
- We appreciate the references to the Glover Review Proposals, which will be amended in the TAN.
- Wild Camping is referenced in the document as we understand the importance of acknowledging this within the TAN.
- The TAN does not ask for extra information on top of the Local Plan, but simply expands upon information within the SDLP and PMP.
- We thank the representation for pointing out discrepancies in the Policy section.

- We will review and add in Policy SD34 to the policy section.
- We will review the section on CIL.

Bignor Park Estate	 Policy SD34 also a relevant policy to add. CIL – is CIL worked out on the area of tent plus ancillary buildings, or on the area of the campsite itself? Concerns that the primary purpose of the SDNPA 	We appreciate the comments	We will review the overall document to
(CGT2I)	 Concerns that the primary purpose of the SDNPA should not be forgotten: To protect and enhance the natural beauty and character of the National Park. A proliferation of camping and glamping should not be to its detriment. In favour of limited and controlled camping/glamping but do not want the National Park to become overcrowded with sprawling campsites. Permanent campsites have limited access to public transport and likely to increase traffic flow. Understood that sites may be useful opportunity for rural businesses to diversify. 	 We appreciate the comments from the Estate. We understand the concerns that have been put forward, however it is set out in the TAN that where the two Purposes conflict that Purpose One takes precedent. It is a principle within the SDLP Policy SD23 to promote sustainable transport. It is also an outcome in the PMP. Rural enterprise and farm diversification is something the SDNPA want to help foster. 	 We will review the overall document to double check that the Purposes of the SDNP are made clear throughout. We will review the section on car parking, and add in links to the recently adopted Car Parking SPD.
Buriton Parish Council (CGT22)	 The draft TAN contains some important messages in terms of tranquillity, materials, location, visual impacts, diversification, biodiversity gains, ecosystem services, light pollution and dark night skies, campfires, waste and car parking. Some of these messages are lost in the dense policy section (page 7-13). The importance of this range of issues should be explained in a brief intro paragraph (page 4). TAN felt to over-encourage camping without planning permission, which could lead to issues. 	 We appreciate the comments put forward by the Parish Council. The TAN is targeted at those putting in a planning applications; it is not possible to write a document for every possible target audience. The Authority does seek added value through the planning system particularly in regard to Ecosystem Services. 	 We will review the whole document to make sure that the overall tone of the TAN is suitable and fit for purpose. We will review the TAN in relation to noise and light. We will review the sections on low cost accommodation, and review how the TAN is balanced. We will review the section on Car Parking and add in the link to the recently adopted Car Parking SPD.

	 The representation goes on to list the times that the TAN 'over-encourages' i.e. Page 4, 6, 17, 20. Not clear what control exists in terms of creep from noise, light etc. The TAN seems targeted at potential developers, rather than all interested parties including parish councils and communities. Low cost accommodation is appreciated; it is felt that more balance is required in the TAN. No suggestions that 'added value' should be obtained from camping/glamping sites. Car parking needs greater consideration, and needs to ensure screening from public views. Consider a framework that defines an application category. Each category could include the anticipated impact on landscape, local community etc and link to a SDLP Policy. 	The framework concept put forward by the PC is interesting, and it is something we will take forward and consider in the future.	
Individual (CGT23)	 Hope the work was done in house and not external consultants. Many areas of the National Park have experienced increased demand on the downs and landscape. Impacts on biodiversity, soils and access to PROW. SDNPA needs to consider before expanding tourism as increasing exposure could lead to the degrading of the landscape. 	 The work was done in house by officers from the SDNPA. We understand concerns that the National Park has had an increase in demand, and these are areas that we will continue to monitor. The landscape is at the forefront of all decision making. 	No text amendments.
Rogate Parish Council (CGT24)	TAN is fundamentally flawed. It sets relevant policies and states the conflict between Purpose one and two, but then suggests means of	We appreciate the comments from the Parish Council.	We will review the wording in regards to what is written in the policy section.

- ameliorating the effects of camping/glamping. Location, screening etc. will not detract from the fact development will have a negative impact. The impact also depends on the longevity of the site (temporary or permanent).
- Can the SDNPA justify playing down the fundamental policies of landscape and increasing numbers of visitors with no evidence. It may benefit some but disadvantage others such as hotels/B&Bs.
- Feasibility plans should be submitted along with an application to justify loss of resources/natural beauty.
- Questioning how the SDNPA will control visitor numbers. Staycations due to Covid.
- Notes the difference in tourism policies in the different English National Parks.
- Should there be a link between where sites are located and the SDILCA, identify 'target areas'.
 What is the maximum size developments should be. Believe there is also an overdependence on tourism that could damage the special qualities.
- TAN should distinguish between normal camping (temporary, less overall impact), as compared with 'glamping' (more permanent). Do not agree that the Policy doesn't make a distinction. Also require clarification how camping can positively contribute to the landscape, views and tranquillity.
- "Your application for camping and glamping will help us increase the amount of low-cost overnight

- The SDLP sets out the need for low cost holiday accommodation within the National Park.
- We are not playing down the policies of landscape which are based on national legislation and policy. The purpose of the TAN is to provide additional technical guidance for applicants.
- Officers do look at the SDILCA as a first point of call when dealing with planning applications. However, we will review what is written in the TAN this to make sure it is fit for purpose and properly referenced.
- As this is a TAN we cannot amend or add Policy in the SDLP in regards to distinguishing between camping and glamping.
- We will rethink the section that has been referenced to as a blanket term. We agree further nuance should be added.

- We will review the section in regards to landscape to ensure that it is correctly referenced in the TAN.
- We will review the section which comments on the SDILCA.
- We will add context to the section regarding "low-cost overnight accommodation" does come across as 'blanket terminology.'

Individual (CGT25)	 accommodation in the National Park" – blanket term that should be addressed. Local roads are sometimes single-track rural lanes, with poorly maintained passing places. They continue to be damaged by farm traffic, water erosion. Can be treacherous in places, especially at night. Increased amount of pop up campsites, especially due to Covid pandemic, are in higher demand and encroach on the unspoilt nature of the SDNP. Visitors typically arrive by private transport, which leads to further road degradation/infrastructure issues. Unsure why there are not more restrictions on proposed locations of these sites, more guidance and control over who can provide campsites. Should be near amenities, not intrusive. There are several successful, fit for purpose campsites nearby to amenities, but not on the doorstep of the community. 	 We appreciate the concerns over the rural lanes in the South Downs. Within Policy SD23, there are criteria in regards to sustainable transport that we believe are reflected in the TAN. 	 We will check that 'Roads in the South Downs', is referenced within the TAN. We will also review if the Covid-19 pandemic and increase in visitors has been covered within the TAN. We will review the section on sustainable transport.
Individual (CGT26)	 Concerns over pop up campsites permitted under 28 day rule. These campsites have little rules governing their location to the surrounding area. Jill's campsite diagram shows an idyllic scenario, when not all campsites are like that. Campsites are contentious. Visual impact from campsites are generally not aesthetically pleasing and noticeable, especially in a rural setting. 	 We appreciate the comments in regards to the 28 day, it has been something that has been raised throughout this consultation, and will be an area we add context to. We appreciate the concerns around noise and tranquillity, and it is something we have raised in the TAN. 	 We will review and expand upon the 28 day rule section. We will review and expand upon the Policy section on Tranquillity. We will review and expand upon the Policy section on Dark Night Skies. We will also add in a link to the recently adopted Dark Night Skies TAN (update) May 2021.

	 Noise is an issue, especially that the SDNP is extremely tranquil in nature. Tourism will increase noise that goes through the night and affect wildlife. Increased traffic. Hard to mitigate these issues. Understand the attraction of visitors, but are unaware of local communities. Light pollution is especially obvious in the Dark Sky Core. Main concern is the lack of legislation on pop up campsites. 	We appreciate that light pollution can be a cause of concern, and it is something we are constantly raising awareness about.	
Elsted and Treyford Parish Council (CGT27)	 Pleased to see the inclusion of the term 'Wild camping.' The only mention in the TAN of the need to take proper account of communities and local people who might be adversely affected by the impact of Camping and Glamping site is stated in the text of the Countryside code. Believe there must be adequate text for addressing this important issue in the context of the National Park, The TAN should address and possibly include reference to SD23, and the impact on local people. Suggest that the TAN note it would be useful to clarify the need or otherwise of licenses and permissions that might have to be issued by other bodies before a site can be used e.g. concerning the storage and disposal of effluent. Some sites may attract many visitors, the need for site rules but adequate supervision should be made clear. 	 We have been made aware of permits and licenses from the Environment Agency and we will be adding references to the TAN. We will see if there is any specific guidance to the Countryside Code and National Parks. Although we appreciate the comment in regards to site rules, this may be outside of Policy control. However, it may be something that we add into the TAN as an advisory note. 	 We will conduct further research into the Countryside Code, and amend/add text where necessary. Particularly in regards to the SDNP. We will review the Policy context around SD23 and the impact on local people. We will research the other licenses that may be needed, although these may be referred to in decision notices.

Individual (CGT28)	 Understand that the SDNP wants to provide greater access to visitors, and enable them to stay overnight. Expansion of tourist accommodation is central to this objective, but needs to be done in a way that doesn't damage the SDNP. Camping/Glamping has a role but must be measured and impacts be considered fully. Aware of local sites that are inappropriate. Appreciate the guidelines, and that they have been designed to minimise the impact on the Park. Three different types of tourism that should be looked at differently; camping accessed by foot or bike, camping accessed by car and Glamping in semi-permanent or seasonal structures. The representations goes on to list what could be included in these different types. To maintain integrity of the SDNP, it is essential the Authority encourage the right type of development. 	 We appreciate the comments, and agree that tourism accommodation done correctly can be beneficial to visitors in the SDNP. The TAN (along with the SDLP/PMP) will provide a robust mechanism for all applications to be judged against. We appreciate the comments in regards to the proposed guidelines put forward by the consultee. Although the TAN cannot create any new Policy, we will take forward all comments for consideration when reviewing the SDLP in the future. 	No text amendments required.
The Alice Holt Community Forum (CGT29)	 Forum consists of representatives from each parish councils, communities and villages. Forum has experience in camping proposal for Yurts in Alice Holt Forest that was withdrawn as a result of opposition from the Forum and local community. Several points were put forward for consideration, such as; siting of campsite in ancient woodland, damaging to the biodiversity including wildlife, necessary to consider related infrastructure 	We believe that the points raised by the forum, in regards to a recent planning application, have been included within the document.	No text amendments required.

	(toilets, washing facilities, car parking), false claims of environmental improvements.		
Appleton Town Planning (CGT30)	 The TAN does not include the exemption for camping under Section 169 of the Public Health 1936. Where the use of land as a campsite for more than 42 days consecutively or 60 days in total in any 12 consecutive months can take place by members of recreational organisations which hold a camping exemption certificate. As the TAN references the 28 day rule, then it would be reasonable for completeness to refer to camping exemption certificates. 	We appreciate the information in regards to Section 169. Further research will be required to check how and if this is applicable for the National Park.	We will look into adding some text/footnote around Section 169 of the Public Health 1936.
Individual (CGT31)	 Suggest that the TAN positively identifies a requirement for the applicant to provide on-site information and directions to local shops pubs/restaurants, local transport. That this also includes for the provision of wi-fi facilities as a service. 	 As this is a Technical Advice Note, it cannot create any Policy requirements. However, these are positive points to raise that may be taken forward. In Policy comments to planning applications, we do comment on sites that provide on site information to guests. This helps foster a sense of guardianship for those visiting the SDNP. 	We will look into collaborating the views put forward into the TAN.
Cedar Valley (CGT32)	 Overall satisfied with the document, it contains the correct information with good indications of what is required. Respondent owns and runs a glamping business for over 10 years, with a large amount of guests supporting the local businesses, pubs, village stores, market towns and seaside day trips. 	 We appreciate the detailed feedback from the consultee. We understand the concerns around the Community Infrastructure Levy (CIL), but they cannot be addressed through this TAN 	We will view the content of the CIL section to make sure it is fit for purpose and provides adequate information.

	 Representation goes onto explain how they have organised walks, pub trips for guests, and how it all has a positive impact. Look to source materials, products and employment for the business all from the local areas. Put in bespoke safari style tents, similar size/footprint with a timber frame, thicker, which meant they could be used more months of the year. The tents were CIL liable (£15,000 each) which made the tents unviable. Concerns over the CIL liability, and that similar style accommodation has not been charged with CIL. 	We agree that locally sourced materials and products, also helps other local businesses and the economy.	
West Sussex	No officer level comments being made to the	N/A	N/A
County Council	consultation.		
(CGT33)			
East Marden Parish Council (CGT34)	 The TAN gives insufficient weight to Policy SD7 Tranquillity and SD8 Dark Night Skies. Experience of 3 temporary campsites create significant noise from amplified music, excessive flood lighting. The sites relied on private cars in order to gain access, TAN should explore what outside settlement policy boundaries sustainability actually means. Explanation for permitted development 'pop up campsites' needs more detail, including that the 28 day rule includes setting up and removal of all campsite equipment. 	 We appreciate the detailed comments from the Parish Council. We will be adding extra references to SD7 and SD8. We will also be sending all Parish and Town Councils a link to the updated Dark Night Skies TAN (update). 	 We will add in more context to Policy SD7 and SD8. We will also cite the recently published Dark Night Skies TAN update 2021. We will review the wording and clarity around temporary campsites. Adding extra clarity to the rules of the 28 day rule. We will look into adding some guidance on advertising/promotional signs regarding campsites. If necessary, we will add in the SDLP Policy, or National Park guidance.

	The TAN should give guidance about the use of advertising/promotional signage indicating the presence of a campsite. To ensure all signage is in line with the SDLP.		
Environment Agency (CGT35)	 Environmental Permits (Foul Drainage) – advise that the section about service provision is strengthened. Should be made clear that any environmental permits are required. Info can be found at: https://www.gov.uk/guidance/check-if-you-need-an-environmental-permit. If there are no mains connection for foul drainage, then the environmental permit under the Environmental Permitting (England & Wales) Regulations 2016, may be required, unless exemption applies. Additional permitting guidance can be found here: https://www.gov.uk/environmental-permit-check-if-you-need-one. It can also take up to 4 months whether a position on a permit can be decided. I3 weeks to decide whether to vary a permit. Some development may be subject to General Binding Rules. More information can be found here: https://www.gov.uk/permits-you-need-for-septic-tanks 	 We appreciate the additional information on Environmental Permits, and think it is important guidance for applicants. We also appreciate the additional information on the Regulations and Government Guidance. 	 We will add in a section in regards to Environmental Permits to strengthen the section, and add clarity for applicants. We will add in a footnote in regards to the Regulations for clarity. We will add in some text in regards to how long permits may take to be resolved. We will add in a footnote in regards to the General Binding Rules for clarity.
Fittleworth Parish Council (CGT36)	 At present do not have any major campsites within Fittleworth Parish. Residents' concerns come from adverse effects on views over the Rother Valley. In light of the climate emergency one might expect more to be made of possibly wind, flooding and 	 We appreciate the concerns from residents about the views of Rother Valley. We welcome that the Parish Council is aware of the climate 	We will review the information on the climate emergency, and what is written in the TAN.

	duction and control of the control of		1
	drainage concerns and steps to mitigate them.	emergency, and how there can	
	Trees should not only be viewed as 'screening' but also wind breaks.	be natural solutions.	
	Drainage and flooding generally has been major consideration for residents in recent years.		
	The PC do also wish to promote the right kind of memorable tourism in the National Park.		
Patching Parish Council (CGT37)	 The PC welcomes the SDNPA recognition that Neighbourhood Plan policies are a material consideration. The response then goes onto list policies within the Patching NDP that the PC wanted to highlight when referring to tourism accommodation. Policy SD23c; notes that tourism is important, however considering from the perspective of visitors is not helpful to the local community. The SDNPA should consider residents alongside visitors. Would like to request that the SDNPA ensure that planning applications are presented to statutory consultees at the earliest possible stage, and consider PC limited resources. 	 We appreciate the comments from the Parish Council. We note the comments in regards to the Patching NDP policies. We also note the reference to Policy SD23, and although we note the concerns as to how this is worded the TAN cannot amend or add Policy. Pre-applications are available on the website. We would urge the Parish Council to check the weekly list, and check the planning applications map for applications. 	
Chichester District Council	The TAN is very informative with relevant	We appreciate and welcome the We will add in further context in reg	
	background information and description of the	detailed comments from CDC. to the planning application process flor	
(Environmental	planning process.	We welcome the feedback on diagram. Taking into account the three diagram.	ee
Protection)	Particular comments were made in regards to the	the planning application flow main areas put forward by CDC.	
(CGT38)	flow chart, with specific comments made to the	diagram, and appreciate the extra • Also putting in footnotes and links to	
	planning application process. To summarise, this	information that can go into this Paragraph 182 of the NPPF, in regard	ls to
	included; the information that needed to be submitted for validation stage, that the diagram	to be as useful as possible for 'Agents of Change' principle. applicants.	

	should highlight the possibility of refusal of planning permission and to make reference to Paragraph 182 of the NPPF 'Agents of Change' principle. • Further comments were made in regards to the submission documents, to summarise these were; contaminated land, lighting, noise, air quality, drinking water, sewage system and sustainable drainage system (SuDs). Further consideration may be given to food preparation and sale and premises licenses. • CDC fully supports that any applicant should make contact with the LPA at as early a stage as possible. Also for a small charge, the environmental protection team can feed into any pre-application advice. • The team at CDC advocates the prior approval of a Site Management Plan (SMP) by way of condition for campsite planning applications. The effectiveness of a SMP that is specific to a particular site's needs and can evolve and adapt to a changing business. It may be that the TAN could have a template for a SMP as an appendix to the document. The representation goes on to provide a useful example of a SMP.	 We welcome the information on the additional services available from the Environmental protection team at CDC. We will look into the concept of Site Management Plans as we think they could be a useful addition to the TAN. 	 We will consider and where applicable add in the comments to; contaminated land, lighting, noise, air quality, drinking water, sewage system and sustainable drainage system (SuDs). We will review add where necessary a reference to contacting the LPA as soon as possible. We will explore the concept of adding in an example Site Management Plan as an appendix to the document. We will add in reference to the SMPs as part of the planning application stage.
Individual (CGT39)	 Well-considered and thoughtful document, in particular the need for any camping site to be visually obtrusive has been clearly addressed. Insufficient weight has been given in the document to the risk of unsupervised/wild camping. Such as; risk of fire, unsupervised dogs, rubbish/waste and 	 We appreciate the comments in regards to Wild Camping, and carefully considered the wording for this section. However, we will review this ahead of the final document. 	 We will add more context and wording around wild camping for clarity. We will review the wording around car parking, and will reference the adopted Car parking SPD.

	 additional lighting being brought onto site. Visitors may be unaware of appropriate conduct in this special environment. The applicant thought that tents on the development site should be cited as close as possible to the homes of site owners. Any large sites should be discouraged within the Park. Any large sites should be cited near but outside the boundaries of the Park. Should also have an on site supervisor. Car parking should be as unobtrusive as possible. Noticeable damage to lane verges due to additional visitors. The extra dislodged mud is being swept away in heavy rainfall. In the quest to make the park more accessible, it would be a shame to lose the special qualities. 	 The TAN can only provide additional technical advice and not create new policy, such as citing the tents close to the homes of site owners. However, it is something we will take forward as feedback. We are the local planning authority within the SDNP, and cannot comment on locating sites outside of the boundary. 	We will review the wording regarding the Roads in the South Downs document.
Sompting Estate (CGT40)	 The Estate has been running for 250 years, and has been an active farm since 1980. The Estate expects environmentally sensitive management by tenant farmers although it limited their productivity. Tourism related activities are essential, due to resource limitations and Covid pandemic, it is not clear when the Estate may be in a position to submit a Whole Estate Plan (WEP). However, they can progress small scale tourism. By 2030, the Estate would like to have net income from the vineyard, in hand farming and local food supply. There is nothing in the TAN that does not harmonise with our own aspirations and we 	 We apologise that Sompting Estate was not added to the consultation list, and it was an error on our behalf that they were not notified. We do appreciate the detailed comments from Sompting Estate. We understand that diversification key for estates and farmers. If the Estate would like to pursue a WEP, then please contact the Planning team. 	 We will review the section on the Purposes, and cross reference what was put forward by the Estate. We will review the sections on Page 9c, Page 10f and Page 10 giii. To add further context for clarity. We will review the section on CIL, and amend and/or add where applicable.

	 develop tourism enterprises. However, as a relatively small Estate, a large administrative burden in the TAN which requires preparation or referencing. The Estate was not notified of the consultation, even though they are a part of a farm cluster and a member farmer. The representation goes on to comment on the analysis of the two purposes, and their interaction with camping and glamping. Whether the TAN envisages a contribution to Purpose I through enhancement or conserving the landscape. To give farms and Estates confidence that this important contribution aspect will be recognised by the planning officers evaluating the application. The representation also comments on amendments to Page 9c in terms of tranquillity. Page 10f in terms of ancillary facilities and Page 10gii. Lastly, comments were made in regards to CIL, and that it would be helpful to clarify that the liable square metre area is the footprint of permanent structures. It does not include the 'grounds'. 	Some of the changes put forward are amendments to Policy wording of the SDLP, which cannot be changed in the TAN.	
Bignor Parish Council (CGT41)	 Very careful consideration needs to be taken when considering locations for campsites within SDNP. Great risk of destroying the views of the Park, which the Authority are required to protect and preserve. People choose to live/work in the Park particularly for beauty and tranquillity and it should not suffer. 	 We appreciate the comments from the Parish Council. We agree that careful consideration is needed when considering locations for campsites within the SDNP. We agree that consideration is needed for noise, light, dark night 	 We will review and add where necessary, information on Roads in the South Downs as well as the importance of sustainable transport and siting campsites near to transport hubs where feasible. We will add in a link to the recently published Dark Night Skies TAN

	 Insufficient public transport and facilities – does not support the influx and exodus of campers. Infrastructure is a single-track road and would need their own private transport. Camping/glamping produces additional noise and light, damaging Dark Night Skies and disturbing wildlife. Not against camping and glamping, but it is essential that the lifestyle of communities should not be damaged. 	skies and wildlife. More information on the importance of this will be considered. • We agree that the lifestyle of our communities should not be detrimentally impacted.	(update) May 2021. We would also urge our Parish and Town Councils to share this document with their parishioners.
Alciston Parish Council (CGT42)	 Unique nature of the SDNP, urge considerable caution in opening areas to new campsites. Tranquillity in the countryside is increasingly under pressure for human activity. Unless a campsite is well run then there are a number of attendant risks, which may diminish the quality of the area and the enjoyment of visitors. For example, the risk of fire (particularly given the very dry summers). Litter is also another concern, along with additional light which affects the Dark Night Skies and tranquillity. There will inevitably be many more cars for longer periods which will need more car parking areas. Over the past year because of increased visitor numbers, grass verges have been ruined. Siting any new campsites near public transport is important. Limiting visitors to stay in existing buildings with proper facilities would avoid these potential problems. 	 We appreciate the comments from Alciston Parish Council. We understand that, especially due to the Covid 19 pandemic, areas such as the SDNP are under more recreational pressure. We also understand that risks of fire, litter, light pollution and tranquillity and we have given these areas special importance in the TAN. Within Policy SD23, it does reference in part e. 	 We will review the section on risks, such as linking to the recently published update to the Dark Night Skies TAN. We will review the section on car parking, and add a link to the recently published Car Parking SPD.

Hampshire Count
Council
(Landscape
Planning,
Environmental
Initiatives,
Environment
Department)
(CGT43)

- Both the layout of the campsite and the way it operates have the potential to profoundly affect the landscape both visually and experimental. The TAN is very much welcomed. HCC looks at applications that are sensitive sites in rural or edge of settlement locations. Or where they can have impacts on landscape views, character and tranquillity.
- HCC have put forward some additional points for consideration.
- Shared facilitates should be placed in the best locations to avoid disturbance and impacting views.
 Consider keeping them away from pitches and splitting them up to make screening easier.
- Guidance on provision of services to pitches/cabins and what will (and won't) be acceptable. A sensitive site may perhaps have no main services/individual hook ups to avoid issues with noise and light.
- Place parking in best location to avoid disturbance, impacting views and light spillage.
- Ensure pods/shepherds huts do not become permanent buildings: <u>PodsPG_21Jan13.pdf</u> (<u>lakedistrict.gov.uk</u>)
- Work associated with services should be carefully designed for getting power and water. Rural sites can mean extensive trenching and potential damage to existing vegetation.
- Existing vegetation needs to be carefully considered
 as it can be an asset to the site in terms of play opportunities, shade, shelter as well as potential

- We appreciate the detailed comments submitted by HCC.
- We agree that vegetation can be a huge asset to a site, in terms of Ecosystem Services and services that can be found in nature.
- We think that the comments from HCC can be easily incorporated into the TAN, and will add clarity.
- We will review the section on shared facilities and amenity provision. With possible amendments to the text regarding 'splitting up' amenities.
- We will review the section on car parking, and add in a link to the recently adopted Car Parking SPD.
- We will review the Lake District document in regards to pods/shepherds huts becoming permanent.
- We will add in a reference to the recently published Dark Night Skies TAN (update) May 2021.
- We will review the section in regards to landscape and typography, and the location of tents.
- We will review and possible add in sections to do with accessibility, and link it to the Outcomes in the PMP.
- We will review and expand the advice on the 28 day rule/temporary advice.
- We will also review the sections on Page 18 and 19.

Polegate Town Council (CGT44) Marine Management Organisation (CGT45)	screening whilst respecting any trees and planted buffer. Limit pitches to relatively lower parts of the site. Include advice/references to disabled access. Expand advice on the 28 day rule and include references (which will be added in a following row). Pg18 campfires include guidance to limit use of imported wood from outside immediate area for biodiversity. Pg19 problems of possible oil/petrol leaks will apply to impermeable surfaces. Polegate Town Council Planning Committee had no comments to make in relation to the TAN. The MMO is responsible for the management of England's marine areas. Delivery functions are marine planning, marine and wildlife licensing and enforcement, marine protected area management, marine emergencies and issuing grants. All public authorities taking decisions that affect or might affect the UK marine area must have regard to section 58(3) of Marine and Coastal Access Act 2009. Local Authorities may also wish to refer to our online guidance, self-assessment checklist and guidance note. They submitted a marine plan areas map for England. In particular a link to the draft South East Inshore marine plan. They also submitted information on Marine licenses.	 N/A We appreciate the comments from the Marine Management Organisation. Although there is only a minimal amount of the SDNP that would be affected, it may be beneficial to add in links. 	 N/A We will add in footnotes and possible text to the TAN that covers the Marine and Coastal Access Act 2009. We will review the TAN and where applicable, will add in references to the online guidance, guidance note and self-assessment checklist. Along with the draft South East Inshore Marine Plan and Marine licenses.
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CPRE Sussex (CGT46)	 Recognise that the TAN has been produced to help guide applicants and agents when applying for planning permission. Recognise the economic and social importance of access to the SDNP and the significant benefits that a 'night in nature' can give to local communities. It is right that the SDNPA is supportive of camping and glamping, however this should not be at the expense of the natural beauty, wildlife and cultural heritage of the Park. Important that the tone of the document overall reflects the weighting of purpose one and two when they conflict. Welcome the reference to well located developments, that reduce the need of travel extensively by car, and linked to PRoW. Finally note that some of the links on Page 8 do not work. More information should be given to SD6, 7 and 8. Find Figure 5; Jill's campsite very useful. 	 We appreciate the comments by CPRE Sussex. We appreciate the understanding of how the TAN has been produced, and recognition of its target audience. We appreciate the references to the purposes, and how they should set the general tone of the document. We will review this as an action. We appreciate the feedback on Figure 5; Jill's campsite. 	 We will review the whole document to make sure that the overall tone of the TAN is suitable and fit for purpose. We will change the links on Page 8. We will add in further information to Policy 6, 7 and 8 so it is similar to the rest of the Policy section.
Seaford Town Council (CGT47)	Confirm that the Council's Planning and Highways Committee considered a report on the TAN and resolved to fully support.	N/A	N/A
Sutton and Barlavington Parish Council (CGT48)	 The Parish Council find the SDNP TAN supplement acceptable. The PC wish people, cyclists, horse riders, campers and glampers to come and enjoy the SDNP. However, unlike other National Parks the SDNP is virtually surrounded by medium sized towns and small towns in the centre. These already have 	 We appreciate the comments from the Parish Council. We agree with the comments made around facilities and the lack of facilities in the more rural areas of the SDNP. 	No text amendments required.

	facilitates and infrastructure that can accommodate additional visitors. These are also served by rail links. • The development of these sites needs to balance the supply of facilitates around the SDNP. There will need to be a reconciliation with the need for access.	Officers are aware of the careful balance that needs to be made between the landscape capacity, access and visitors.	
Murray Planning Associates (CGT49)	 The document is very well put together and a useful reference source. Can you please confirm however that the 28 day temporary opportunity for campsite sites is available in the NP for the extended period to 56 days through Class BA? The document only reference 28 days. 	 This comment was added in for clarity and transparency, but was also responded to directly on 9 March 2021. The TAN does make reference to 56 days in the footnote of the document and will be monitored. 	No text amendments required.
Individual (CGT50)	The document is merely an exercise to complete, and that SDNPA do not take notice of what anyone contributes, consequently it all being a pointless exercise.	This was a document that the SDNP was keen to produce, and was not simply an exercise to complete. We realise that we have our purposes, one of which is to promote opportunities for the understanding and enjoyment of the special qualities. As the document states, we were aware that more applications were being submitted for camping and glamping and that some of them were being refused.	No text amendments required.
Ditchling Parish Council (CGT51)	Advised that a link in the following section was broken:	We appreciate the information on the broken link and will update.	Will update the link to: https://www.southdowns.gov.uk/planning-

	"Not all camping and glamping schemes will require planning permission, so it is advisable to seek advice from us at the earliest opportunity. The SDNPA offers a free service that helps applicants know if their proposal will require a planning application. Please note that this is not preapplication advice that is referred to in the next section. More information on whether you need planning permission can be found here: http://www.southdowns.gov.uk/wp-content/uploads/2015/01/DINPP-pro-forma.doc "		applications/do-i-need-planning- permission/
Individual (CGT52)	 A comprehensive document. The general tone is one of being informative but also tends to encourage the promotion of glamping activates. Main concerns are that once a change of use or an established use is accepted, that the possibilities for further development is increased. I do however, appreciate the need to balance protection with suitable economic stimulus. I appreciate the focus of the consultation will be authorities within the SDNP, however with such an extensive boundary there are many other authorities that are equally affected. The situation is likely to be exasperated with the proposed new planning legislations. 	 We appreciate the opening remarks in regards to the tone and information in the document. We appreciate the concerns in regards to change of use, however, these will typically require a planning application that will be looked at by officers. It is not a legal requirement for LPAs to consult on TANs. The Authority decided that in this instance a limited consultation was appropriate. We do appreciate the interest from groups outside of the National Park and this does include all of the Local Planning Authorities bordering the SDNP. 	No text amendments required.