

Breamore Estate Camp Site, Breamore

Planning Statement



Client: Breamore Estate Company Ltd.

Date of first Issue: June 2022

Document control

Document:	Planning Statement
Project:	Breamore Estate Camp site
Client:	Breamore Estate Company Ltd.
Job Number:	784-B038761
File Origin:	W:\Projects\784-B038761_Breamore_Camp_Site

Revision:	1	Status:	First Draft
Date:	01/06/22		
Prepared by: DHB	Checked by: NB	Approved By:	
Description of revision: First draft			

Revision:	2	Status:	Second draft
Date:	14/6/22		
Prepared by: DHB	Checked by: AW	Approved By:	
Description of revision: Second draft			

Revision:	3	Status:	Final
Date:	16/6/22		
Prepared by: DHB	Checked by: AW	Approved By: AW	
Description of revision: Final version for issue			

Contents

1.0	Introduction	1
2.0	The Site and locality.....	2
3.0	Proposed Development.....	4
4.0	Key Planning Considerations	6
5.0	Summary	9

Appendices:

Appendix A: Planning Policy

1.0 INTRODUCTION

- 1.1 Tetra Tech Planning has been instructed by the applicant to prepare a Planning Statement to support a full planning application to New Forest District Council (hereafter referred to as NFDC). Full planning permission is sought for the use of one of the fields belonging to Breamore Estate, the 'Rally Field' (415321 Easting / 118715 Northing), as a seasonal camp site for tents, caravans and campervans; over an annual time period of up to 120 days.
- 1.2 The Estate has historically used this field for rallies with various camping and caravan clubs but for a limited number of days per year.
- 1.3 This Planning Statement analyses the application site and surrounding area, sets out the planning policy context and explains why the proposed development is appropriate having regard to the key planning policy, technical and environmental considerations. National and regional policies, relevant to the proposed development are noted in Appendix A.
- 1.4 Having regard for the site context, site constraints, and local validation requirements, the application is supported by the following documentation:
 - Covering Letter
 - Application Form
 - OS scale Location Plan
 - Planning Statement prepared by Tetra Tech
 - Ecological Appraisal prepared by Tetra Tech
 - Calculation of Phosphorus Outputs prepared by Tetra Tech
- 1.5 This statement should be read in conjunction with the accompanying technical reports noted above.

2.0 THE SITE AND LOCALITY

- 2.1 The site falls within a single local planning authority, New Forest District Council, and sits within the parish of Breamore. Hampshire County Council are the relevant Highway Authority.

Site Description

- 2.2 The overall site is approx. 3.5ha in size and is located within the wider Breamore Estate of c. 1265ha and the registered Breamore Park and Gardens (Historic England registered number: 1000329). It is also situated within an Area of National Beauty, the Cranbourne Chase and West Wiltshire Downs. Position of field shown in **Fig. 1** below.



Figure 1 showing position of field

- 2.3 The principal building on the working estate is the Grade II* listed Breamore House, which is set within a Registered Park and Garden comprising woodland to the northwest and formal gardens and parkland to the southeast. The proposed site is approx. 239m southwest of Breamore House.
- 2.4 The Breamore Estate has recently submitted a pre-application for advice relating to the development of a number of sites within the Estate. The intention of this proposal is to assist in raising additional income to support future development and maintenance of the historic buildings and structures under ownership of the Estate.
- 2.5 The site is accessed via the A338, Salisbury Road and North Street or alternatively via the Breamore House Road. There is a public right of way extending north to southeast through the field.

- 2.6 It is expected that there will be a potential slight increase in traffic accessing the site across the proposed 120 day per year usage, but the impact should be minimal.
- 2.7 There are four listed buildings in the vicinity; to the northeast are Church Cottage (Grade II listed) and Breamore Cottage (Grade II listed) and a Barn, 10m west of Breamore Cottage (Grade II listed); to the west is Museum Cottage (Grade II listed). The potential heritage impacts on these buildings will be minimal as all of the buildings have screening in the form of hedging and trees between them and the proposed site.
- 2.8 To the north of the site is St. Mary's Church (Grade I listed); to the east is open parkland; south of the site is agricultural fields and to the west is the museum buildings, tea rooms, toilets and farm shop.
- 2.9 The area is in flood zone 1 which means that it has a low probability of flooding from rivers and seas; there is very low risk of flooding from surface water, as shown in **Fig. 2** below.

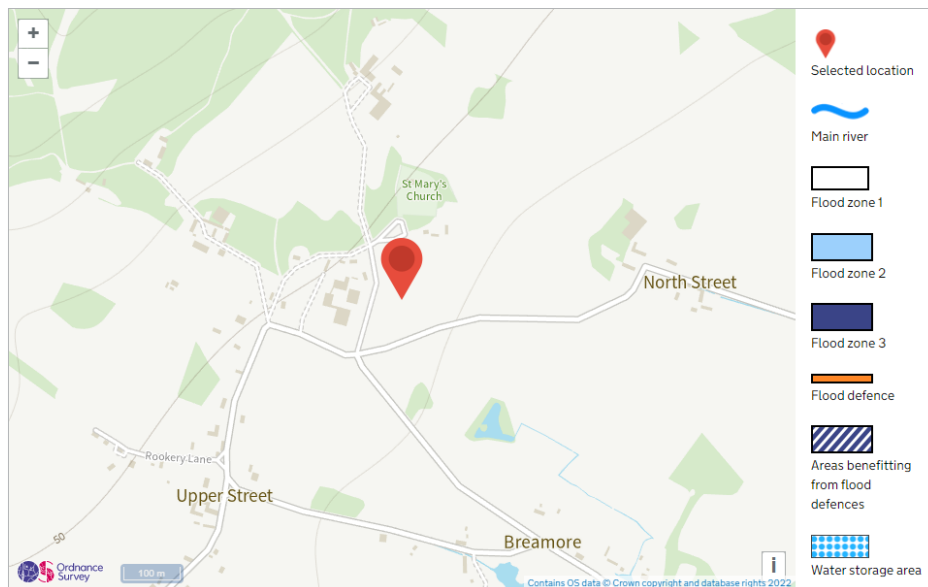


Fig. 2 - Image courtesy of flood map for planning – Gov.uk

3.0 PROPOSED DEVELOPMENT

- 3.1 The Town and Country Planning (General Permitted Development) Order (England) 2015 (the 'GDPO') at Part 4 Class B allows for the Temporary Use of Land, for activities such as camping, for no more than 28 days a year. Our clients are applying for full planning permission to be able to use the site for camping and caravanning for up to 120 days of the year, for approximately 50 pitches, as this exceeds the allowance given by Part 4, Class B GPDO regulations. A full planning application is therefore being submitted.
- 3.2 The campsite currently has no fixed buildings on site; it has previously been used for portable accommodation, such as campervans, caravans and tents only. Permanent toilet and welfare facilities are located nearby on the Estate adjacent to the tea rooms and farm shop, as shown in **Fig. 3** below. The toilet block is a mid-late 19th century building which accommodates male and female toilets and disabled facilities. This level of provision has been beneficial in the past in alleviating the need for any additional permanent structures being built on the proposed field. It is not expected that there will be any significant increase in the use of the current facilities.

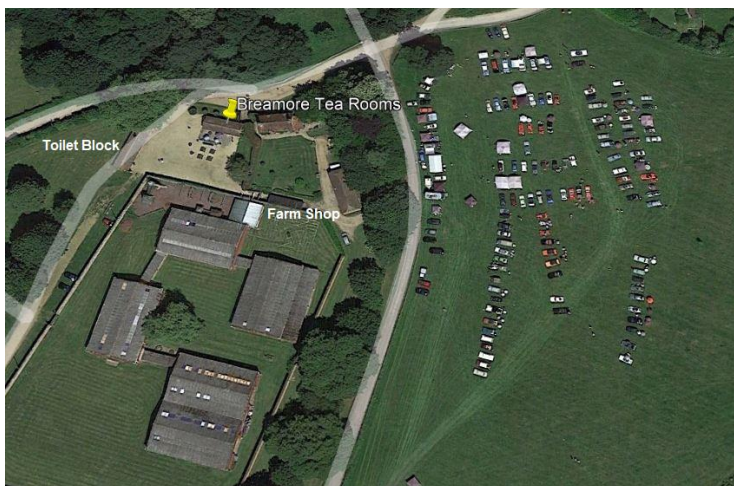


Fig. 3 showing camp site in relation to on-site facilities

- 3.3 The Farm Shop stands adjacent to the Breamore Estate Museum buildings and is within easy walking distance of the proposed site, it provides local day to day provisions.
- 3.4 The current tea rooms are located to the north of the Farm Shop and are also within easy walking distance of the proposed site. Both the Tea Rooms and the Farm Shop date from the 20th Century and have little heritage interest.
- 3.5 Breamore Estate have recently submitted a pre-application to NFDC for advice on redeveloping both buildings to provide greater functionality and services in an improved and sustainable way.
- 3.6 Appropriate measures to ensure that the campsite's use can achieve nutrient neutrality, will be put in place as detailed below and in the accompanying ecological appraisals.

- 3.7 The proposal has no relevant impact on any residential amenity as the site is self-contained, with no lighting on site. There is no visual intrusion into, or overlooking on, nearby residential properties.

4.0 KEY PLANNING CONSIDERATIONS

Principle of Development

- 4.1 The site is situated in a location that is within the Cranbourne Chase Area of Outstanding Natural Beauty (AONB).
- 4.2 The proposal will conserve the special qualities of the AONB and has been designed to minimise adverse impacts on the designated areas, in accordance with Paragraph 176 of the NPPF. This is not a proposal for a 'major' development within the AONB as per paragraph 177 and footnote 60; it will not have a significant adverse impact on the purposes for which the area has been designated or defined.
- 4.3 In accordance with Policy STR2 (of the New Forest Local Plan 2020) the proposal will not have an unacceptable impact on the special qualities and purposes of the Cranborne Chase Area of Outstanding Natural Beauty or on the adjoining New Forest National Park and their settings. The site will be contained within the Estate grounds with significant facilities already available and local walks and recreational facilities on site, therefore reducing the need to travel out into the New Forest National Park or wider area.
- 4.4 Increasing the number of opening days will assist with relieving harmful pressures on any sensitive parts of the New Forest National Park and will help to meet local recreational needs, in line with Local Plan Part 2 Saved Policy DM25. It will also allow Breamore Estate to diversify by enabling adaptation and change within the Estates facilities in line with Saved Policy DM13.
- 4.5 Policy SRC4 of the Cranborne Chase Partnership Plan 2019 - 2024: The proposal supports tourism facilities in the Cranbourne Chase AONB and supports a sustainable visitor economy, whilst promoting and enhancing the special qualities of the AONB.
- 4.6 The landscape quality of the site would be retained as part of the proposal to comply with Policy ENV4 of the New Forest Local Plan and Policy LAN4 of the Cranborne Chase Partnership Plan 2019 - 2024.
- Neighbourhood Planning
- 4.7 Neighbourhood planning forms part of the planning system under provisions in the Localism Act 2011. The site does not lie within a Neighbourhood Plan area.

Ecology Appraisal

- 4.8 An Ecological appraisal was carried out on behalf of the client by Tetra Tech in May 2022. The full report, as attached to this application, should be read in conjunction with the summary points below.
- 4.9 The proposals for the site are to extend the number of days the existing campsite can be in operation. The proposed number of days the campsite will be open will be 120 days, with a maximum of 50 pitches across the site. Due to the fact the number of opening days exceeds the pop-up camp site regulations, a planning application will be required. The facilities currently used by the existing campsite will accommodate for the increased number of visitors and therefore no additional facilities will be built.

- 4.10 The Ecology team were asked to undertake a desk study to obtain existing information on statutory and non-statutory sites of nature conservation interest and relevant records of protected/notable species within the site and its zone of influence. An extended Phase 1 Habitat Survey was also undertaken, involving a walkover of the site to record habitat types and dominant vegetation, including any invasive species, and evidence of protected fauna or habitats capable of supporting such species. Potential ecological receptors on site and within the zone of influence were evaluated and any constraints to the proposed development were identified.
- 4.11 The site is also within the impact risk zone for the New Forest Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar. As a result, there is the potential for the proposals to impact the integrity of these designated sites and further assessment is required. The Mitigation for Recreational Impacts Supplementary Planning Document (SPD), May 2021, provides a set of measures that are designed to mitigate the recreational impacts on designated nature conservation sites (in accordance with Local Plan Part 2 Policy ENV1). The SPD explains (in paragraph 2.33) that ‘additional visitor accommodation within the Plan Area will have a similar recreational impact on the designated nature conservation sites in the New Forest as residential development. It will therefore be necessary for developments which will increase overnight stays within the plan area to mitigate their impacts.’
- 4.12 Mitigation is made in the form a financial contribution towards off-site projects. The full contribution level is reduced for visitor accommodation based on the maximum occupancy during the year, and this principle will apply to campsites.
- 4.13 Therefore, if a proposed campsite was open for 120 days a year, the contribution should only reflect the duration that the campsite is open and therefore only $x / 365$ of the full contribution to the Habitat Mitigation Scheme will be payable.
- 4.14 The results of the Ecology Appraisal indicate that most of the habitats on site are of low value or are common and widespread throughout the local landscape. The proposal to extend the existing camp site permission is not anticipated to impact habitats recorded on site.
- 4.15 The area of improved grassland is a widespread common habitat type, but it does have potential to support protected and notable species, including foraging birds and badgers. The boundary habitats which consisted of species poor hedgerows and dense scrub, provide an important commuting corridor for foraging and commuting bats, GCN, dormice and nesting birds. The linear habitats connect to a network of offsite habitat across the Breamore Estate. No further survey work is recommended as the proposals for the site do not include habitat clearance or increased lighting levels. If the scope of the works changes then further survey work may be required.

Phosphate Balancing Assessment

- 4.16 Tetra Tech Ecology was appointed by Breamore Estate Ltd. in April 2022 to calculate the change in phosphorus outputs from existing to future use, associated with a proposed extension to the existing

campsite at Breamore. The points below should be read in conjunction with the report attached to this application.

- 4.17 In previous years the site has been used as a campsite for 28 days per year (falling into the Temporary 'pop-up' Campsites Regulations). The Breamore Estate Company Ltd. proposes to extend the number of days the campsite is open for from 28 days to 120 days with approximately 50 pitches.
- 4.18 The proposals for the campsite do not include the construction of any additional facilities, with the existing toilet block, farm shop and tea rooms capable of supporting an increase in users. The wastewater generated by the campsite users will continue to be stored on site and then removed by tanker out of the catchment area to be treated.
- 4.19 Due to the uncertainty over whether new overnight accommodation including camp sites can be accommodated by existing wastewater treatment infrastructure without causing harm to Habitats Sites, Natural England advise that all development resulting in an increase in overnight accommodation should achieve nutrient neutrality. As the site lies within the catchment of the River Avon SAC (and Avon Valley SPA), the key nutrient is phosphorus.
- 4.20 For the calculations an occupancy rate of 1 person per pitch based on a total rate for a 1-bedroom dwelling for each pitch has been assumed. This has given an increased TP budget of 10.17kg/TP/yr.
- 4.21 The site does not make a connection to the public sewer network. The wastewater generated from the camp site users will be stored in large tanks which will be removed from site regularly by a tanker. The wastewater will subsequently be taken to a Wastewater Treatment Works (WwTW) for treatment outside the catchment of the River Avon SAC (e.g., Cranborne Sewerage Treatment Works which discharges to the Moors River in the Dorset Stour catchment). Therefore, although a net increase in total phosphorus will result from the proposals, there will be no increase in total phosphorus within the River Avon catchment.
- 4.22 This protocol for wastewater removal can be secured through an appropriate planning or legal obligation, therefore there will be no potential for a likely significant effect upon the River Avon SAC or Avon Valley SPA to occur.
- 4.23 To conform with Policy ENV1 of the Local Plan and the Mitigation for Recreational Impacts Supplementary Planning Document – in order to address any perceived harm arising from the campsite, the applicant is agreeable to signing a unilateral undertaking which will enable the Council to invoice the campsite every year for a payment to cover the Habitat Mitigation costs, calculated on the number of pitches in operation each day over the permitted season. This should address any potential recreational impact.

5.0 SUMMARY

- 5.2 Tetra Tech have prepared this statement to support a planning application to NFDC for Breamore Estate Company Ltd. Permission is sought to increase the number of days that the camp site can be used throughout each year from 28 days per year to up to 120 days per year, for up to 50 pitches.
- 5.3 It has been demonstrated that the scheme responds to the key objectives of the NPPF and accords with planning policy at both the national and local level.
- 5.4 The proposed development relates well to the surrounding area and is served by local services and facilities. Increasing the number of opening days will assist with relieving harmful pressures on any sensitive parts of the New Forest National Park and will help to meet local recreational needs.
- 5.5 The results of the Ecology Assessment indicate that most of the habitats on site are of low value or are common and widespread throughout the local landscape. The proposals to increase the number of days the existing camp site can be used is not anticipated to impact habitats recorded on site.
- 5.6 Although a net increase in total phosphorus will result from the proposals, there will be no increase in total phosphorus within the River Avon catchment. The protocol for wastewater removal can be secured through an appropriate planning or legal obligation, therefore there will be no potential for a likely significant effect upon the River Avon SAC or Avon Valley SPA to occur.
- 5.7 Taking into account all the data provided by this planning statement and the accompanying Ecological Appraisal, planning policy weighs in favour of this proposal.

APPENDICES

Appendix A - Planning Policy

This section assesses at a very high level, any key planning policy considerations for development on this site. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that, in the determination of planning applications, decisions are made in accordance with the Development Plan unless material considerations indicate otherwise.

This section will first note the national policies of relevance before focusing on the local policies considered of most relevance to the proposed development of the site.

National Planning Policy Framework

The most recent National Planning Policy Framework (NPPF) was published in July 2021 and establishes a presumption in favor of sustainable development. Paragraph 2 states that the NPPF is a material consideration in planning decisions. The following Policies are considered to be relevant to the assessment of this application:

NPPF2 Achieving Sustainable Development - Paragraph 11 stresses that plans and decisions should apply a presumption in favor of sustainable development. As part of this presumption the NPPF actively encourages development which secures economic, social and environmental objectives.

In terms of determining applications, **paragraph 38** states that it is a requirement for Local Planning Authorities to approach decisions in a positive and creative way. Planning Authorities should also work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area, whilst seeking to approve applications for sustainable development where possible.

Paragraph 47 states that planning law requires applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise. It encourages that decisions on applications should be made as quickly as possible.

Paragraph 55 of the NPPF states that conditions can be used to make a development acceptable, where it might otherwise be unacceptable, however, these should be kept to a minimum and only imposed if necessary.

NPPF6 – Building a strong, competitive economy – Section 6, Paragraph 81 states that significant weight should be placed on the need to support economic growth and productivity, taking into account local business needs and wider opportunities for development.

Paragraph 84– Supporting a prosperous rural economy goes on to state that planning policies and decisions should enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings along with the development and diversification of agricultural and other land-based rural businesses and sustainable rural tourism and leisure developments which respect the character of the countryside.

NPPF12 – Achieving well-designed places – Paragraph 130 states that planning policies and decisions should ensure that developments will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping whilst being sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities). They establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; they optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks and that they create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

NPPF15 – Conserving and enhancing the natural environment – Paragraph 174 states that Planning policies and decisions should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; whilst minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Paragraph 176 states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection. However, footnote 53 confirms that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.

Section 85 of the Countryside and Rights of Way Act 2000 requires local authorities to have regard to ‘the purpose of conserving and enhancing the natural beauty of AONBs’ in making decisions that affect the designated area. The conservation of wildlife and cultural heritage are important considerations in all these areas.

Local Planning Policy

New Forest District (outside the National Park) Local Plan 2016-2036, Part One: Planning Strategy (Adopted July 2020)

Policy STR2: Protection of the countryside, Cranborne Chase Area of Outstanding Natural Beauty and the adjoining New Forest National Park. Development should not have an unacceptable impact on the special qualities and purposes of the Cranborne Chase Area of Outstanding Natural Beauty, or on the adjoining New Forest National Park and their settings. In the determination and implementation of development proposals including planned growth, great weight will be given to ensuring that the character, quality and scenic beauty of the Cranborne Chase Area of Outstanding Natural Beauty and adjoining New Forest National Park are protected and enhanced.

Policy ENV1 Mitigating the impacts of development on International Nature Conservation sites, sets out that all residential development in the district would give rise to recreational activities likely to have an adverse impact on the integrity of designated New Forest habitats, alone and in combination with other such residential development.

Policy ENV1 also recognises that overnight accommodation would give rise to waste-water discharges with potential to cause likely significant effects; for this site it would be the effects of Phosphates on the River Avon SAC.

Policy ENV4: Landscape character and quality- Where any development is proposed there is a requirement to retain and/or enhance landscape features and characteristics through sensitive design, mitigation and enhancement measures, to successfully integrate new development into the local landscape context. This includes the following:

- i) Features that contribute to a green infrastructure and distinctive character within settlements including the locally distinctive pattern and species composition of natural and historic features such as trees, hedgerows, woodlands, meadows, field boundaries, coastal margins, water courses and water bodies;
- ii) Features that screen existing development that would otherwise have an unacceptable visual impact;
- iii) Existing or potential wildlife corridors, footpath connections and other green links that do, or could, connect the site to form part of an integrated green infrastructure network;
- iv) The landscape setting of the settlement and the transition between the settlement fringe and open countryside or coast;
- v) Important or locally distinctive views, topographical features and skylines and
- vi) Areas of tranquillity and areas of intrinsically dark skies

New Forest District (outside the National Park) Local Plan Part Two: Sites and Development Management Adopted April 2014

Policy DM25: Recreational uses in the countryside – including horse-keeping/riding – states that development associated with recreational uses will be permitted where it:

- a) will help meet a local recreational need; and/or
- b) will assist in the diversification of an agricultural enterprise; and/or
- c) will assist in relieving harmful pressures on a sensitive part of the New Forest National Park;

provided that there will not be unacceptable impacts on the amenities of local residents, the rural character of the area, local roads or other environmental or agricultural interests (including nearby parts of the New Forest National Park and coast).

Policy DM13 Tourism and visitor facilities identifies the circumstances in which new tourist/visitor related developments may take place, but also enables existing businesses to adapt and change. It seeks to secure the continued contribution to the tourism economy of buildings in a tourist-related use. Development will be permitted where it is part of a farm diversification project; includes the enablement of environmental

improvements to be made at an existing holiday park, camping or caravan site; or the upgrade of ancillary facilities at an existing holiday park, camping or caravan site, or visitor attraction, provided this does not materially increase the overall impact of the development.

Cranborne Chase Partnership Plan 2019 - 2024

Policy LAN 4 - Ensure the conservation and enhancement of the landscape character, tranquility and special qualities of the AONB and its setting, particularly those that are sensitive to change.

Policy SRC 4 - Supports the development of appropriate recreation and tourism facilities, including a range of quality accommodation, that support a sustainable visitor economy whilst promoting and enhancing the special qualities of the AONB