

Application Number: 23/10941 Full Planning Permission

Site: SHOREFIELD COUNTRY PARK, SHOREFIELD ROAD,
DOWNTON, MILFORD SO41 0LH

Development: The upgrading & improvement of central facilities at Shorefield Country Park including an extended staff car park totalling 38 car parking spaces; remodelled arrivals car parking with 65 car parking spaces; refurbished multi-use games area (MUGA); new splash pad/waterpark and associated changing facilities; new activity lawn including a nine hole mini-golf course and activity control hut and storage area; new bike rack; boules court; repositioned caravan showground and sales office; reception extension; laundrette; recreational play area including wooden climbing structures; terrace & seating areas; vehicle barrier & control point; revised access provision & road layouts including new paths and walkways, delivery & drop off points

Applicant: Shorefield Holidays Ltd

Agent: Avison Young

Target Date: 24/11/2023

Case Officer: Robert Thain

Officer Recommendation: Grant subject to conditions

Reason for Referral to Committee: Contrary Parish Council view

1 SUMMARY OF THE MAIN ISSUES

The key issues are:

- a) Principle of Development and South West Hampshire Green Belt
- b) Design and Impact on Amenity
- c) Ecology and Biodiversity Net Gain
- d) Highways and Access
- e) Other Matters
- f) Planning Balance and Conclusions

2 SITE DESCRIPTION

Shorefield Country Park is located in the settlement of Downton, approximately one mile north-west of the centre of Milford-on-Sea. Shorefield Country Park covers approximately 29 hectares between Downton Lane to the west, the Downton Manor Farm mineral extraction site to the east, Blackbush Lane and Studland Common Local Nature Reserve to the east and south-east. To the south is West Road and

farmland north of the B3058. Shorefield Country Park primarily provides holiday accommodation through static caravans, bungalows and lodges.

The application site comprises a small portion (1.37 hectares) of Shorefield Country Park located in the north-west of the wider site. The application site includes central facilities which serves all of the holiday park. These includes a health and fitness club, pub and shop in the main building, car parking, internal access routes, static caravans and existing tennis court and multi-use games area.

Vehicular access to the application site is from Shorefield Road which has private residential dwellings on its southern side. There is an existing road barrier before the second vehicular access point. To the south of the Shorefield Road dwellings is an area of mature woodland.

3 PROPOSED DEVELOPMENT

The application is for:

The upgrading and Improvement of the Central Facilities at Shorefield Country Park including:

- Extended Staff Car Park totalling 38 Car Parking Spaces;
- Remodelled Arrivals Car Parking with 65 Car Parking Spaces;
- Refurbished Multi-Use Games Area (MUGA);
- New Splash Pad/Waterpark and associated WC's Changing Facilities;
- New Activity Lawn, nine hole Mini-Golf Course, Activity Control Hut, Seating Area and Storage Area;
- Provision of a new Bike Rack, repositioned Caravan Showground and Sales Office, Reception extension, new Laundrette, recreational play area including wooden climbing structures, boules court and landscaped area;
- Extension to existing bar's external terrace;
- Vehicle barrier and control point;
- Revised access provision and internal road layouts including new paths and walkways, delivery and drop off points.

4 PLANNING HISTORY

Shorefield Country Park has an extensive planning history in the post-war period.

XX/LYB/01140/1	Extension of office and shop	Granted	11.09.52
XX/LYB/01140/2	Temporary permission for use as office and shop, and extension of office and shop.	Granted	19.01.53
XX/LYB/05861	Erection of wash house	Granted	13.08.59
XX/LYB/06993	Erection of two recreation halls	Granted	15.01.62
XX/LYB/10005	Addition to clubroom	Granted	23.08.65
XX/LYB/11030	Reception office	Granted	25.07.67
XX/LYB/00018/1/C	Erection of new shower block to replace existing	Granted	25.07.69
75/NFDC/03385	Additional uses of part of the existing social club for sale of snacks	Granted	26.09.75
78/NFDC/10091	Construction of a swimming pool and erection of ancillary buildings	Granted	13.06.78

78/NFDC/11014	Construction of a swimming pool and erection of ancillary buildings	Granted	05.09.78
79/NFDC/14732	Alterations and additions to club premises and construction of car parking area.	Granted	09.11.79
79/NFDC/14764	Erection of a double garage for storage purposes.	Granted	12.11.79
81/NFDC/20752	Alterations and extensions to form club room and additional storage area.	Granted	04.12.81
83/NFDC/25199	Alterations and addition of a shop and store.	Granted	08.11.83
85/NFDC/28423	Construction of raised terrace with pergola and erection of entrance porch.	Granted	15.03.85
86/NFDC/33070	Alterations to reception area and addition of office accommodation on first floor.	Granted	28.10.86
NFDC/87/33823	Covered swimming pool and leisure facilities	Granted	04.07.88
NFDC/88/40490	Addition of children's game room with snooker room and club bar	Granted	02.08.90
91/NFDC/48163	Addition of a laundry store, dry store and covered ways.	Granted	10.09.91
92/NFDC/50483	Single storey office addition.	Granted	09.09.92
92/NFDC/51219	Extension to offices at first floor level	Granted	25.01.93
94/NFDC/54887	Alterations to access and roof of existing club premises	Granted	14.09.94
95/NFDC/57936	Single storey extension including take-away facility	Granted	02.01.96
95/NFDC/58139	Glazed terrace canopy and terrace for seating	Granted	17.04.96
97/NFDC/62933	Ground floor extension to reception area (retrospective)	Granted	06.02.98
99/67305	Extension to Cheers Bar and form additional leisure club office.	Granted	24.01.00
99/68169	Ground floor extension of office and extension of pergola.	Granted	03.03.00
00/69996	Single storey addition to Cheers Bar and re-siting of existing offices.	Granted	19.10.00
01/70968	Single storey addition to Cheers Bar, Roof alterations and re-siting of existing offices.	Granted	08.05.01
16/11116	Alterations and extension to access road, gates, bund	Granted	12.04.17
19/11354	Changes to Caravan Showground hard-standing area, Car Park and Landscaping.	Granted	17.12.19
21/11393	New external raised deck with timber pergola and dining pavilions with fenestration changes to existing restaurant; new on-site road layout and associated landscaping.	Granted	30.11.21

22/11463	Revised staff car park totalling 41 car parking spaces; remodelled arrivals car parking with 50 car parking spaces; refurbished MUGA; new splash pad/waterpark and associated changing facilities; new village green activity area including outdoor stage; new nine hole mini-golf course; provision of a new bike rack; relocation and extension to existing caravan show ground and sales office; relocation of existing laundrette; outdoor bar; play area including wooden climbing structures; terrace and seating areas; vehicle barrier and control point; revised access provision and road layouts including covered paths and walkways; delivery and drop off points	Withdrawn 16.06.23
----------	---	--------------------

5 PLANNING POLICY AND GUIDANCE

Core Strategy 2009 (Saved Policy)

CS19: Tourism

Local Plan Part 2 2014 Sites and Development Management Development Plan Document (Saved Policies)

DM1: Heritage and Conservation

DM2: Nature conservation, biodiversity and geodiversity

Local Plan Review 2016-2036 Part One: Planning Strategy

STR9: Development within a mineral safeguard area

ENV3: Design quality and local distinctiveness

ENV4: Landscape character and quality

CCC1: Safe and Healthy Communities

CCC2: Safe and Sustainable Travel

Supplementary Planning Guidance and other Documents

Milford-on-Sea including Keyhaven, Downton and Lymore Village Design Statement (16.12.2002) Supplementary Planning Guidance

6 PARISH / TOWN COUNCIL COMMENTS

Milford On Sea Parish Council

Application 23/10941 (Shorefield Country Park, Shorefield Road, Downton, Milford-on-Sea) was on the agenda for the Milford-on-Sea Parish Council Planning Committee meeting held on Tuesday, 2nd October. Milford-on-Sea Parish Council would deem it appropriate for Shorefield Country Park to engage in a public consultation with Milford-on-Sea residents and holiday homeowners prior to submitting a planning application of this magnitude.

Milford-on-Sea Parish Council strongly object to the proposals within this planning application and believe it to be overdevelopment in a rural location. The committee unanimously agree to submit a PAR 4: We recommend REFUSAL

Unspecified usage of activities lawn and noise pollution

This application is mirror-like to the previous application submitted by Shorefield Country Park earlier this year (22/11463). Within this application there is a very large "activity lawn" with its usage unspecified. The conclusion is the "activity lawn" is a new title to replace the previous "outdoor stage" and the "controls room" is replacing the "bar" in withdrawn application 22/11463. The "activity lawn" would provide Shorefield Country Park facilities to host large-scale outdoor events, such as concerts or discos, which is of great concern to the planning committee. This would inevitably lead to a significant increase in noise levels, both to and from and at the site. This is unacceptable. The parish council is vehemently opposed to increased noise levels and disturbance from probable unspecified events on the "activity lawn", day and night.

Highway Safety

The location on Downton Lane, a country lane that links onto the A337, has several narrow points allowing use by one vehicle at a time. Any increase in traffic along this lane is problematic. The lane leads to difficult, even dangerous turnings, on to the main A337 road would incur increased risk of serious accidents. These roads are also used widely by both pedestrians and cyclists.

Lighting and Environmental Impact

The proposed significant introduction and increase in artificial lighting would cause pollution for the surrounding community and serious detriment to the neighbouring properties, resulting in loss of privacy. The location of Shorefield Country Park is rural, and the proposed lighting plan will have a damaging impact on nesting birds and local wildlife. Overall, the parish council deem the lighting to be excessive and invasive.

Noise Impact and Assessment

Noise levels will significantly increase with the MUGA, splash park and activities lawn. As part of the application, a noise report should incorporate noise levels during the busiest seasons in the park, assessing noise in February is not portraying an accurate and true reading. Therefore, the parish council believe the Venta noise study unsatisfactory.

Proposed External Terrace and Play Area

The proposed terrace on the southern aspect of the site is deemed excessive in size and its locality extremely imposing on near-by properties and holiday homes within the site. In addition, the proposed play areas proximity to the road sparks safety concerns.

7 COUNCILLOR COMMENTS

No comments received

8 CONSULTEE COMMENTS

Comments have been received from the following consultees:

NFDC Ecologist

I do not have any material concerns on this application from an ecological

perspective.

The ECS Ltd Bat Impact report (October 2022) did not raise any significant concerns with respect to impacts on roosting bats as a result of the proposals. The report focused on looking at 5 portable buildings to be relocated. I note that the proposals include an extension of the existing reception building. I would welcome feedback on whether this building has been considered with respect to impacts on roosting bats or not.

Updated Comments (following receipt of Preliminary Roost Assessment, October 2023)

I am happy with the preliminary roost report, and this satisfactorily addresses my concerns / outstanding queries.

NFDC Environmental Health (Pollution)

NFDC Environmental Health does not object to the application, providing suitable planning conditions are attached to any granted permission.

Having reviewed the Noise Impact Assessment (Ref: VA4516.230807NIA.2 (8 August 2023), Venta Acoustics) I am satisfied that the report has considered appropriate and current guidance to assess potential noise sources introduced by the proposed development and that the methodology and findings are reliable.

NFDC Environmental Health (pollution) therefore has no objection to the proposal based on noise concerns. I note the proposal includes the installation of external lighting I therefore recommend a condition (as set out) is included with any future permission granted.

NFDC Environmental Health (Commercial), Appletree Court

No comment.

NFDC Conservation Officer

The proposed development will not have any impacts on heritage assets.

NFDC Tree Team

The submitted Arboricultural Impact Assessment Method Statement & Tree Protection Plan (6/8/23) (Trevor Heaps Arboricultural Consultancy Ref TH3580 B) sets out that 16 trees have been identified to be removed in order to facilitate this development.

The majority of these trees are small stature crab apples/ornamental trees or are holm oaks and a beech that have been pruned/managed to constrain the size and spread of the crowns and have no public amenity outside of the site. The only trees that are visible to the public outside of this site are T1 & T3 Lombardy Poplars and T2 Monterey Cypress. These trees are close to each other and have suppressed crowns. The form of these trees makes them unsuitable for protection by a Tree Preservation Order and therefore they are not considered a constraint to development. The loss of the trees can be mitigated through replacement planting and landscaping of the site. The amenity Pine trees T10, T11, T12, T19, T20 & T21 are shown to be retained and sufficiently protected by the measures set out in the above report. I have no objection on tree grounds to this proposal subject to the conditions (as set out) below.

HCC Minerals and Waste Planning

The proposed development lies within the mineral and waste consultation area (MWCA) - Sites section. It lies adjacent to the safeguarded site Downton Manor Farm operated by New Milton Sand & Ballast. This area is informed by the safeguarded sites list as defined through Policy 16: Safeguarding - mineral infrastructure of the adopted Hampshire Minerals and Waste Plan (2013) (HMWP).

It is often the case that appropriate buffers and mitigation measures can make potential nearby development compatible. Any mitigation measures would need to be undertaken by the proposed non-minerals or waste development and reduce potential impacts to and from the safeguarded site to levels that would ensure the safeguarded site could continue its intended minerals or waste use. Usually, the mitigation measures would need to focus on impacts such as noise, dust, visual impact, odour and traffic movements. They can take a variety of forms, including landscape design, tree planting, barriers, building design and orientation and use of different building materials (such as double glazing for windows). In order to discharge the requirements of the safeguarding policy, HCC would expect to see how the nearby safeguarded site was considered, how operator comments were taken into account and what impacts that had on the proposed development design.

HCC Highways

As this is for the redevelopment of the existing facilities within the site, and will only be used by the Holiday Park, there will be no additional trips associated with this development. Therefore, the Highway Authority has no objections to this application.

Scottish and Southern Electric

Comment Only

9 REPRESENTATIONS RECEIVED

75 letters of objection raising the following grounds and 1 letter of support. Note - the actual number of households objecting is less than the headline number as in some cases their multiple objections from some address. The objections are grouped into subject areas for convenience.

Principle of Development

- General over development in a rural area
- Application site in the South West Hampshire Green Belt
- There is no place for a holiday camp type facility in Downton/Milford-on-Sea
- Shorefields has outgrown the site.
- No need for additional play facilities.

Highways and Access

- Traffic generation on the narrow Downton Lane
- Poor visibility splays at the northern end of Downton Lane at junction with A337
- Increased congestion and fumes
- Needs access improvements on Downton Lane
- Proposal will impact on ability of local farmers to use local roads

Noise

- Noise from splash park and MUGA
- Noise survey done in February (out of season)
- Planning restrictions should be put in place regarding the use and opening hours of these facilities (Bar/Control Hut and Festival Area/Activity Green) to ensure that all residents are not adversely affected by these latest amended proposals.
- There is a potential for additional events such as pop concerts and parties.
- Activity Lawn - it is likely that this area will again be used to stage events, bringing in removable seating and staging.
- The previous proposal encompassed amplified sound from 9:00 until 18:00 every day with regular evening events planned until 21:30 and later events on a temporary basis during the summer months. In the current application Shorefield Country Park has simply omitted its proposed use for the area. There are no time limits and no amplified sound limits as the "activities" are not specified.
- The building which served this area was previously correctly labelled a "bar" but has now been relabelled a "control hut" However, its purpose remains the same - a "control hut" does not need a serving hatch, 13 tables and 52 chairs on a patio.
- No acknowledgement of crowd noise in this area although hundreds of people pursuing "activities", drinking, and congregating in one place will generate significant amounts of noise which has not been addressed by Shorefield or their noise consultants.
- There is no information on the form of entertainment that will take place on the "activity lawn" and no indication of spectator/participant numbers.
- No account has been taken of the accumulation of noise from Downton Manor Farm gravel extraction and the new proposal.
- Applicant has not suggested any form of mitigation or noise reduction.
- Clear restrictions should be placed on activities that could drive significant increases in noise levels, in terms of hours of operation, number of people gathered together, no external bar and especially on no external amplified sound.
- Amplified sound - live events, festivals or outdoor movie nights.

Light Pollution

- Light pollution from proposed floodlights.
- Nearby Downton Lakes is beginning to establish itself as an alternative site to nesting birds due to the loss of habitat in New Lane Milford and Mount Lake. The proposed floodlighting will serve to provide a beacon of light over the Park, deterring all wildlife including invertebrates.
- The quantity, strength and height of light bulbs to be strung around the proposed seating area, and the very tall street lights to the south of the building in what is currently the car park will shine directly into our house.

Local Amenity

- This is a quiet rural area with little or no light or noise pollution and any increase in the levels of the stated pollutants would detrimentally affect the lives of local residents and the value of properties.
- According to the International Association of Event Hosts it is estimated that people seated on the ground require 1.5 square metres and people standing require 0.5 square metres to comfortably enjoy events. The proposed "activity lawn" is approximately 1000 square metres which would generate a crowd capacity of over 600 seated or 2,000 standing. This is in addition to the 52-place table seating by the bar.
- Dramatic increase in the amount of litter in and around these protected sites.

- Application fails to specify precisely what activities will be carried out in the MUGA.
- Increase in anti-social behaviour.
- Potentially noisy activities should be located more centrally within the park.

Ecology and Trees

- Impact on protected species including bats and owls.
- Impact on the adjacent nature reserve.
- Loss of trees.

Local Economy and Infrastructure

- Once built, this will be a long-term addition to the park, contributing to the creeping development of the site, drawing trade away from local businesses, amenities, and community events, so negatively impacting our local economy.
- Extra strain on infrastructure and resources such as water, sewer, power, roads.
- While housing can be seen as a necessity, holiday parks aren't. The village does not benefit financially from the proposal and instead will suffer loss to both built and natural resources.

Community Engagement

- Why can there not be an open forum with local residents and Shorefield owners to agree a way forward and to have an open and transparent dialogue with someone from Planning, the local MP/Parish Councillors, and why not invite a highly regarded conservationist such as Chris Packham?
- Total disregard for the Milford on Sea Design Statement.
- Do not understand why the opinions of householders in the local area are not considered by Shorefield before they go ahead and commission and submit detailed plans to the planning office (NFDC).

10 PLANNING ASSESSMENT

A. Principle of Development and South West Hampshire Green Belt

i. Principle of Development

Saved Local Plan Policy CS19 Tourism sets out:

The strategy is to support the local tourism industry by:

(a) encouraging tourism and provision for visitors which is appropriate to the District's settlements and countryside and consistent with environmental objectives;

(b) retaining and enhancing existing serviced accommodation and supporting the provision of new serviced accommodation in towns and villages;

(c) maintaining and enhancing existing tourist and visitor facilities;

(d) supporting new tourist provision and initiatives in towns and villages, and in the countryside through the reuse of existing buildings or as part of farm diversification, particularly where these would also benefit local communities and support the local economy;

(e) supporting measures within the Plan Area which would relieve tourist pressures on the most sensitive areas of the New Forest National Park, and which would protect and enhance vulnerable habitats and landscapes;

(f) enhancing the visitor appeal of coastal environments and the coastal settlements of Barton, Milford, Lymington, Hythe and Eling. Improve the quality of recreational opportunities and managed access to the coast where this would be consistent with the protection of nature conservation interests;

(g) continuing to support the development and promotion of New Forest Marque produce;

(h) supporting car-free tourism initiatives that benefit tourists and local communities.

The supporting text for Policy CS19 Tourism (Paragraph 7.6.1) sets out that (emphasis added):

The New Forest National Park, the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty, the coast and the character of the rural market towns and villages, all attract visitors to the area. Employment related to tourism in such areas as hotels, leisure facilities, shops, restaurants, camp sites, holiday parks, and sailing is one of the largest employment sectors in the district. Tourism also supports facilities and amenities which benefit local communities, while the maintenance of high quality and diverse environments contribute to the general quality of life for all.

Paragraph 7.6.2 goes on to set out (emphasis added):

The main focus for tourism in the Plan Area includes the historic towns and villages of Lymington, Hythe, Ringwood, Fordingbridge and Milford-on-Sea, and the coast. These areas can provide facilities and amenities which will complement and relieve visitor pressures on the National Park, as well as being visitor destinations in their own right.

As such, the Local Plan supports in principle (Policy CS19 criterion c) maintaining and enhancing existing tourist and visitor facilities. The supporting text confirms that this relates to holiday parks and that Milford-on-Sea, and the coast is identified as one of the main areas of focus for tourism development. For reference, the proposal does not include any additional guest accommodation in the form of caravans or chalets.

Therefore, the proposed enhancements to Shorefield Country Park are acceptable in principle.

ii. Impact on South West Hampshire Green Belt

Local Plan Policy ENV2 (The South West Hampshire Green Belt) sets out that the openness and permanence of the South West Hampshire Green Belt will be preserved with particular regard to its stated purposes and those of national policy for the Green Belt. Development proposals in the Green Belt will be determined in accordance with national planning policy.

The National Planning Policy Framework (NPPF) paragraphs 147 to 151 sets out guidance on proposals affecting the Green Belt. The national Planning Practice Guidance (PPG) sets out further advice on considering proposals in the Green Belt

NPPF paragraph 147 sets out that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. NPPF paragraph 148 sets out that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

NPPF paragraph 149 sets out that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this include:

- (criterion b) 'the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- (criterion c) 'the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- (criterion d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces; and
- (criterion g) 'limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: – not have a greater impact on the openness of the Green Belt than the existing development; or – not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority'.

The national Planning Practice Guidance (PPG) which provides additional detail to the NPPF (what factors can be taken into account when considering the potential impact of development on the openness of the Green Belt. Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

- openness is capable of having both spatial and visual aspects - in other words, the visual impact of the proposal may be relevant, as could its volume;
- the duration of the development, and its remediability - taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
- the degree of activity likely to be generated, such as traffic generation.

The site lies within the South-East Hampshire Green Belt. The designation washes over all the application site. The submitted material includes a Green Belt Openness Statement (Avison Young, July 2023). Each element of the proposal will be considered in turn with regard to the potential impact on the South West Hampshire Green Belt.

The following elements of the proposal are considered to fall under NPPF paragraph 149 criterion (b) given the use is for outdoor recreation: bike rack, recreational area, splash pad and their ancillary facilities (WC's and Changing Rooms), activity lawn,

mini-golf, landscaped area for large board games and recreational kids play area and boules court. As such, the provision of these facilities, which are in connection with the existing use of land (holiday park) and of a recreational nature are appropriate in the Green Belt line with NPPF paragraph 149.

The following elements of the proposal are considered to fall under NPPF paragraph 149 criterion (c): reception extension, shopfront extension and extended external terrace given that they each comprise either an extension or alteration of a building that does not result in a disproportionate addition over and above the size of the original (host) building. It is also considered that cumulatively the three elements would also not comprise a disproportionate addition to the host building given its significant existing scale and massing. As such, the provision of these facilities, which are in connection with the existing use of land (holiday park) are appropriate in the Green Belt line with NPPF paragraph 149.

The following element of the proposal is considered to fall under NPPF paragraph 149 (criterion d): laundrette given that it is the proposed replacement of an existing building, is in the same use and is not materially larger than the one it replaces. The submitted Green Belt Openness Statement confirms that the volume of the proposed laundrette is the same (40m²) as the existing laundrette.

The residual elements of the proposal is considered to fall under NPPF paragraph 149 (criterion g): staff car park, repositioned caravan showground, caravan sales office, deliveries entrance and access, lodge showground, caravan layby and security bollards which comprise 'limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings)' subject to not having a greater impact on the openness of the Green Belt than the existing development.

The supporting Green Belt Openness Statement (November 2023) sets out with regard to openness and volume that:

With regard to the visual impact of our proposal, as demonstrated in our Planning, Design and Access Statement, despite the application only being visible from one road which provides access to the Park from the west, the remainder of the core section of the site is well screened which is proposed to be retained. The proposed layout is considered an improvement to the park with regards to the impact on the units as the pitches which are located in close proximity to the core central facilities area.

It should be highlighted that the site in its current state includes a large amount of hardstanding which is generally utilised for car parking purposes. The proposed scheme seeks a considerable reduction in the amount of hardstanding with the car parking concentrated into two main areas and an increase in the amount of amenity areas proposed which in turn soften the landscape of this central facilities area.

Although the majority of the buildings located within the central facilities area are not permanent buildings and therefore their volumetric impact on the openness of the Green Belt should be relevant to the subject application, it is worth noting that the proposed footprint of the area will be reduced by 32 square metres, as demonstrated by the table below. We therefore considered that the proposal will improve the openness of the site in spatial terms.

In terms of the degree of activity generated, the Green Belt Openness Statement also sets out that:

The proposal for the site does not seek to increase the number of holiday caravans provided by the site and consequently, it is not considered that the scheme will generate any significant level of additional activity and/or traffic generation. On this basis, it is considered that the proposal will not have any adverse visual or volumetric impact and will improve the openness.

The application site comprises a comparatively modest portion of the wider holiday park site located in the centre of the northernmost area. The character of the application site is typical of a holiday park with a mix of caravans, hardstanding, ancillary facilities and recreational facilities and it is considered that the proposals would not change this fundamental character. The Block Plan (Ref: 3228.5.03 D, Dec. 2022, Leisure Concepts) clearly illustrates that the application site is located a significant distance from the existing mature boundary treatments at the edge of the wider holiday park on Downton Lane (west), and at fields to the north and west associated with the existing mineral extraction site and vehicular access. The application site has an open boundary with Shorefield Road immediately to the south which is characterised on the southern side of the road by a mix of detached houses and chalet bungalows in good sized plots. Beyond this is a backdrop of mature woodland and further parts of the wider holiday park site.

The point that the applicant makes in the Green Belt Openness Statement that the application site is well-screened is accepted given their predominantly mature character and the lack of inter-visibility given the significant separation distances.

The Green Belt Openness Statement sets out that the actual increase in the overall volume of the buildings in the proposal is approximately 655m³. Essentially, it is considered that this is an acceptable given the scope of the proposal and the location of the application site within the wider holiday site and the mature screening identified.

The Green Belt Openness Statement (Paragraph 3.7) sets out with regard to openness that:

As set out in our Planning, Design and Access Statement, the redevelopment of the central facilities area seeks to reduce the existing footprint of the area, as demonstrated by Figures 2 and 3 show below. This clearly demonstrates that the development is seeking to increase the openness of this section of the park, which in turn is in accordance with Paragraph 137 of the NPPF as well as ENV2 of the Local Policy which sets out that development proposal will be determined in accordance with national planning policy.

Essentially, Officers do not agree with the conclusion drawn by the applicants that the proposal could increase the openness of the application site given the scope of the proposal. The proposal seek to regenerate the site through new landscaping, facilities and the reconfiguration of existing buildings and temporary accommodation including caravans and lodges. The existing mature boundaries of the wider holiday park are outside the application site and remain unchanged. As such, it is considered that there is no overall impact on openness by virtue of the proposal i.e., its net affect is essentially neutral.

The Green Belt Openness Statement (Paragraph 3.8) sets out that the proposal does not seek to increase the number of holiday caravans provided by the site and consequently, it is considered that the scheme will not generate any significant level of additional activity and/or traffic generation. Essentially, Officers agree with this conclusion on the basis that there will be no net increase in visiting patrons and that the proposed uses are for the current levels of use.

Therefore, on the balance of considerations, the proposal would not have a greater impact on the openness of the Green Belt than the existing development despite the overall modest increase in the total volume of buildings within the application site. There would be no change in the character of the existing mature screening, traffic movements would not be significantly increase given that the proposal does not increase accommodation levels and the net impact on openness is neutral.

As such, the proposal accords with Local Plan Policy ENV2 (The South West Hampshire Green Belt), NPPF paragraphs 147 to 151 and PPG.

B. Design and Impacts on Amenity

Local Plan Policy ENV3 (Design Quality and Local Distinctiveness) sets out that all development should achieve high quality design that contributes positively to local distinctiveness, quality of life and enhances the character and identity of the locality by creating buildings, streets, places and spaces that are (as defined) functional, appropriate and attractive. New development will be required to, inter alia, avoid unacceptable effects by reason of visual intrusion or overbearing impact, overlooking, shading, noise and light pollution or other adverse impacts on local character or residential amenity.

The submitted masterplan for the site sets out five distinct parcels of land within which all the proposed elements will be sited. There are seventeen (17) different elements in the application.

- a) Reception Extension
- b) Shopfront Extension
- c) Laundrette
- d) Bike Rack
- e) Staff Car Park (38 Spaces)
- f) Repositioned Caravan Showground
- g) Caravan Sales Office and Deliveries Entrance and Access
- h) Lodge Showground
- i) Caravan Layby
- j) Security Bollards and Control Barrier
- k) Recreational Area
- l) Splash Pad Water Play Area and WC's and Changing Rooms
- m) Activities Lawn, Activity Control Hut, Seating area and Storage Yard
- n) Refurbished Multi Use Games Area (MUGA)
- o) 9-hole Mini Golf
- p) Extended External Terrace
- q) Recreational Kids Play Area and Boules Court

Each element of the proposal will be considered in turn with regard to the design and the impact on local amenity. The cumulative impacts of the proposal are then considered.

a) Reception Extension

The details for the proposed reception extension are set out in the combined plan Existing and Proposed Reception Extension Details (Drawing No: 3228.5.113D, December 2022). The proposed extension would cover an area of 65m². The depth of the projection is a maximum of 4.25m and width of projection is 17.185m. The height of the extension would remain well below the existing roof ridgeline. The proposed materials are weatherboard cladding and glazing. The glazed element comprises a small atrium with an apex roof.

Essentially, it is considered that the proposed design is modest in scope and comprised of suitable materials for the modern host building. As such, this element of the proposal accords with Local Plan Policy ENV3 (Design Quality and local distinctiveness).

The reception extension is located on the east facing elevation of the host building with views towards the centre of the application site. The nearest residential dwellings are approximately 118m to the north-west (on Downton Lane) and 105m to the south on Shorefield Road.

Essentially, it is considered that this element of the proposal would not give rise to any significant impact on the amenity on the occupiers of dwellings in the local area by virtue of overlooking, overbearing impact, loss of light or any other adverse impact. As such, this element of the proposal accords with Local Plan Policy ENV3 (Design Quality and local distinctiveness) criterion (ii).

b) Shopfront Extension

The details for the proposed shopfront extension are set out in the combined plan Existing and Proposed Shop Details (Drawing No: 3228.5.111C December 2022). The proposed alterations to the existing shopfront do not affect the existing footprint, roof or eaves heights. The extension would be limited to changes to the shop fenestration through the introduction of bi-fold doors.

Essentially, it is considered that the proposed design is modest in scope and comprised of suitable materials for the modern host building. As such, this element of the proposal accords with Local Plan Policy ENV3 (Design Quality and local distinctiveness).

Essentially, it is considered that this element of the proposal would not give rise to any significant impact on the amenity on the occupiers of dwellings in the local area by virtue of overlooking, overbearing impact, loss of light or any other adverse impact. As such, this element of the proposal accords with Local Plan Policy ENV3 (Design Quality and local distinctiveness) criterion (ii).

c) Laundrette

The details for the proposed new Laundrette building are set out in the combined plan Proposed Laundrette (Drawing No: 3228.5.103C December 2022).

The proposed Laundrette would cover an area of 51.6². The maximum dimensions of the Laundrette are depth (8.6m), width (6.0m) and height (4.66m). The proposed materials are weatherboard cladding and clay roof tiles.

Essentially, it is considered that the proposed design is modest in scope and comprised of suitable materials. As such, this element of the proposal accords with Local Plan Policy ENV3 (Design Quality and local distinctiveness).

The nearest residential dwellings are at least 70m to the west (on Downton Lane) and as such it is considered that this element of the proposal would not give rise to any significant impact on the amenity on the occupiers of dwellings in the local area by virtue of overlooking, overbearing impact, loss of light or any other adverse impact.

The submitted Noise Impact Assessment (Venta Acoustics, 8 August 2023) does not identify any substantial noise impacts arising from the use of the laundrette facilities.

However, the proposed laundrette is sited close to existing caravans within the Shorefield site, and their amenity should also be considered. As such, it is considered reasonable to condition the hours of use of the proposed laundrette to between 07.30 and 21.00 rather than to rely on the general hours of use set out in the Application Form (06:30 to 00:30). This could have the benefit of reducing the potential for disturbance to site patrons in nearby caravans in the later evening and early morning.

Therefore, subject to a suitable condition, this element of the proposal accords with Local Plan Policy ENV3 (Design Quality and local distinctiveness) criterion (ii).

d) Bike Rack

No design or amenity issues arising given the very modest scale of the proposed covered bike rack.

e) Staff Car Park (38 Spaces)

The proposed 38 vehicular parking spaces in this area would in part utilise an existing area of hardstanding. No design or amenity issues arise from this parking which is intended for staff use only.

f) Repositioned Caravan Showground

The proposed repositioning of the caravan showground involves siting caravans immediately south of the proposed staff car park. Given the context of a large holiday park, this element raises no design or amenity concerns.

g) Caravan Sales Office and Deliveries Entrance and Access

A replacement Caravan Sales Office is proposed closer to the main building and will be accessed by a new pathway. Given the context of a large holiday park, this element raises no design or amenity concerns. The Deliveries entrance and access is a new hard surface route sited between the caravan sales office and main building. Again, this element raises no design or amenity concerns.

h) Lodge Showground

The proposed lodge showground involves siting holiday lodges immediately east of the proposed family mini-golf area. Given the context of a large holiday park, this element raises no design or amenity concerns.

i) Caravan Layby

For larger vehicles utilising the site, a new pull-in/layby is proposed on the eastern edge of the site boundary adjacent to the proposed lodge showground. This comprises a lozenge-shaped area of hardstanding. Given the context of a large holiday park, this element raises no design or amenity concerns.

j) Security Bollards and Control Barrier

The proposed security bollards are to be sited in two locations within the existing car park. A line of security bollards divides the easternmost third of the car park from the

remaining areas to the west. A second line of security bollards separates the car park from the pedestrian route at the north-west corner of the car park. Given the context of a large holiday park, this element raises no design or amenity concerns. A new control barrier to replace the existing one can be secured through a suitable condition.

k) Recreational Area

The proposed recreational area is adjacent to the visitor car parking area. The location of the proposed recreational area is currently used for car parking. Essentially, it is considered that there would be some minor visual improvement to this area through the removal of these parking spaces and the introduction of a new landscaped area focused on providing large format outdoor board games (chess, draughts etc). This can be secured through a suitable condition.

l) Splash Pad Water Play Area and WC's and Changing Rooms

The supporting Planning Statement (p. 24) sets out that:

The existing tennis court is to be replaced with the proposed splash pad/water park and outdoor toilets and changing facilities, providing users of the area with sufficient space to utilise for recreational purposes.

The proposed splash pad would comprise a water-focused facility for younger children comprising a set of slides and tipping bucket in a fenced off area. The facility is set out in the Combined Plan 'Proposed Splash Pad Details' (Ref: 3228.5.1080, Dec. 2022). The maximum height of the slides is 6.66m and the fenced-off area has a maximum depth of 24.953m and maximum width of 13.961m. The slides are comprised of plastic and the floor of the fenced off area is rubber crumb.

It is considered that the proposed design is a suitably scaled children's facility in a holiday park and comprised of suitable materials. As such, this element of the proposal accords with Local Plan Policy ENV3 (Design Quality and local distinctiveness).

A number of representations have objected on the basis of the noise arising from this proposed children's facility. The supporting material does not suggest suitable conditions for the hours of use of the proposed splash pad facility. Clearly, for this facility, the hours of use are driven to a large extent by the age of the users and the time of year and daily weather conditions. Children will not be playing in the facility when it is cold or dark or the weather inclement.

As such, it is considered reasonable for the splash pad park to have a suitable condition stipulating the hours of use between 10am and 7pm between 1 May and 30 September and 10am and 4pm between 1 October and 30 April. Essentially, it is considered that the condition strikes a reasonable balance between providing children with the opportunity to play in the facility and reducing the impact on the amenity of both other site occupiers and permanent local residents in terms of noise arising in the early morning and evening periods.

The proposed w/c and changing rooms are not considered to give rise to any significant amenity impact on the occupiers of both accommodation within the site and permanent neighbouring residents.

The applicant originally included floodlighting for the proposed splash park. However, following discussions with Officers, the applicant has submitted a revised

Lighting Plan (Ref: 3228.5.102E, Dec 2022) which removes all the proposed floodlighting. No additional lighting is proposed at the splash park.

As such, it is considered that this element of the proposal would not give rise to any significant impact on the amenity on the occupiers of both accommodation within the site and permanent neighbouring residents by virtue of noise and/or light pollution subject to the proposed conditions as set out. Additionally, there would not be an impact on local general amenity by virtue of overlooking, overbearing impact or any other adverse impact.

Therefore, subject to suitable conditions, this element of the proposal accords with Local Plan Policy ENV3 (Design Quality and local distinctiveness) criterion (ii).

m) Activities Lawn, Activity Control Hut and Storage Yard

The proposed activities lawn is sited in the centre of the application site adjacent to the mini-golf. The applicant has confirmed in writing the following details for the proposed activities lawn:

Please find attached a copy of a sample programme of lawn activities which details the activities that would be run on the lawn area. These include:

- *Family Pottery*
- *Panna Soccer (10-16 years old)*
- *Slime School*
- *Robin Hood & Pirates activities*
- *Tie Dye*
- *Body Zorbs (8-14 years old)*
- *Disc Golf (8-15 years old)*
- *Nerf Warz (8-15 years old)*
- *Kwik Cricket*
- *Welly Wanging*
- *Family Water Warz*
- *Rounders*
- *Balloon Olympics*
- *Character Photos*

These activities will be run by the Entertainment team so will be fully controlled. As my Clients run a family Holiday Park, they will be focussing the use of the are on family led entertainment in this activity lawn.

My Clients will NOT be offering any form of adult entertainment i.e., alcohol fuelled live music events. The activity lawn will be manned from 09:00 – 17:00 in the off peak and 09:00 – 19:00 during peak times and non-operational outside of these times.

It is considered that these types of supervised daytime activities for youngsters and families are suitable for the proposed activity lawn subject to the proposed hours of use as set out, which can be controlled through a suitable condition.

Representations received have questioned the scope of activities which could potentially be held on the Activity Lawn which may it is perceived give rise to significant amenity issues. As such, it is considered appropriate to add a suitable condition which stipulates the activities which are not permissible on the Activity Lawn. These include:

- Organised adult team sports, shooting and field archery
- Equestrian activities and gymkhanas
- Circuses, funfairs, carnivals
- Weddings and other religious or civil ceremonies
- Firework displays
- Outdoor commercial exhibitions and auctions
- Car boot sales & markets
- Live music event including concerts and discos.
- Amplified recorded music

Some representations received have also objected on the basis of the potential of the activity lawn to host 'large scale events' including musical festivals or concerts which could have attendees numbering in the hundreds or more. The original application (Ref: 22/11463), which was withdrawn in June 2023, included a proposed outdoor stage.

The proposed stage, which was objected to in a numerous representations submitted in relation to the previous application (Ref: 22/11463) has been removed from this application.

As such, it is considered appropriate to also condition the use of the Activity Lawn to specifically exclude musical performances, other evening entertainment shows and amplified music, and the use of removable seating and/or staging.

Notwithstanding that, it is considered that the Activity Lawn by virtue of its modest size alone is clearly not capable of hosting events which could accommodate hundreds or more of patrons.

The activity lawn is located at least 60m from the nearest permanent residential dwellings on the southern side of Shorefield Road. Given this separation distance and the proposed conditioned hours of use it is considered that this element of the proposal would not give rise to any significant amenity impacts on the occupiers of permanent residential dwellings on Shorefield Road by virtue of excessive noise.

The applicant has submitted a revised Lighting Plan (Ref: 3228.5.102E, Dec 2022). The only additional lighting arising at the boundary of the Activity Lawn comprises bollard lighting.

The proposed Activity Control Hut and Storage Yard is sited in the centre of the application site adjacent to the mini-golf. The applicant has confirmed that the purpose of the Control Hut is to control access to the splash pad area and to manage the mini-golf (giving out clubs, balls etc). The Control Hut would be open between 9am and 7pm in peak periods and 9am and 8pm in off-peak periods. The equipment storage would be located behind the Control Hut.

As such, the proposed use of the Activity Hut is not to operate as an auxiliary drinks bar. A suitable condition has been added stipulating the proposed uses and hours of use for the Control Hut.

The proposed design of the Activity Hut is that of a modestly scaled weatherboard outbuilding with a clay tiled pitched roof. The storage yard would be fenced off.

It is considered that the proposed design is a suitable for an Activity Control Hut in a holiday park and comprised of suitably durable materials. As such, this element of the proposal accords with Local Plan Policy ENV3 (Design Quality and local distinctiveness).

As such, it is considered that this element of the proposal would not give rise to any significant impact on the amenity on the occupiers of both accommodation within the site and permanent neighbouring residents by virtue of noise and/or light pollution subject to the proposed conditions as set out. Additionally, there would not be an impact on local general amenity by virtue of overlooking, overbearing impact or any other adverse impact.

Therefore, this element of the proposal accords with Local Plan Policy ENV3 (Design Quality and local distinctiveness).

n) Refurbished Multi Use Games Area (MUGA)

The application site has an existing MUGA with two floodlights. The proposal is to refurbish the MUGA with a new surface, lockable gate and chainlink fencing. It is considered that the proposed design is a suitable for a MUGA in a holiday park and comprised of suitably durable materials. As such, this element of the proposal accords with Local Plan Policy ENV3 (Design Quality and local distinctiveness).

Regarding the provision of additional floodlights for the MUGA have been removed from the scheme, as demonstrated by the revised Lighting Plan.

The applicant has confirmed that there are two existing floodlights on the right-hand side of the MUGA which are only operational in the winter months when local leisure members use the sports pitch between the hours of 17:00 to 20:00. Outside of the above, two other existing lights where the Splash Pad and Changing Rooms are proposed have been omitted.

It is considered that the impact on local general amenity arising from noise associated with the use of MUGA can be controlled through a suitable condition stipulating use between during the peak season (1 May to 30 September) between 10am and 9pm (Monday to Sunday inclusive) and during the off season (1 October to 30 April) between 10am and 8pm (Monday to Saturday only and not on public holidays during that period).

As such, it is considered that this element of the proposal would not give rise to any significant impact on the amenity on the occupiers of both accommodation within the site and permanent neighbouring residents by virtue of noise subject to the proposed conditions as set out. Additionally, there would not be an impact on local general amenity by virtue of overlooking, overbearing impact or any other adverse impact including additional light pollution in the absence of any significant additional lighting.

o) 9-hole Mini Golf

The intention of this proposed facility is to provide an additional family activity. The proposed layout is set out in the Combined Plan Proposed Mini Golf Details (Ref: 3228.5.112C, December 2022). The design includes astroturf playing surface, timber sleeper walkways, water feature and rocks and coastal style planting. Essentially, it is considered that the proposed design is a suitably scaled family friendly facility in a holiday park and comprised of suitable materials.

It is considered that this element of the proposal would not give rise to any significant amenity impacts by virtue of excessive noise subject to a condition for hours of use to be limited to between 10am and 9pm between 1 May and 30 September and 10am and 5pm between 1 October and 30 April.

The revised Lighting Plan (Ref: 3228.5.102E, Dec 2022) sets out that the lighting for

the mini golf would comprise only bollard lights to illuminate walkways. It is considered that this lighting would not give rise to any significant impact on the amenity of the occupiers of both accommodation within the site and permanent neighbouring residents by virtue of light pollution.

Therefore, subject to an hours of use condition, this element of the proposal accords with Local Plan Policy ENV3 (Design Quality and local distinctiveness) criterion (ii).

p) Extended External Terrace

The holiday park already has an external seating area which is located to the south of the main building where guests can sit outside to eat and/or drink. The proposal includes the creation of an extended seating area at this location. This is set out in the submitted Combined Plan 'Proposed External Terrace Details', Leisure Concepts, January 2023 (Ref: 3228.5.116E). The plan sets out that the extended terrace could accommodate approximately 94 extra seats over and above the existing provision. The existing vehicular parking sited to the south of the main building would be removed and used instead for a mix of the proposed extended terrace, a boules and landscaped children's play area. The latter elements are considered separately below.

The application is supported by a Noise Impact Assessment (NIA) (Venta Acoustics, 8 August 2023). The NIA (p. 4) sets out that it is proposed that the external seating area could be used until 21:30 from Whitsun week through to the start of September. The NIA (Section 7.1, p.5) sets out that the external seating area has been modelled to have a sound level of 75dB(A) which would equate to a lively external seating area. The extended external seating area is not proposed to have any amplified external music or similar. Noise levels from the current seating area are predicted to be 51dB(A) at Cherry Tree House to the south.

NFDC Environmental Health has provided the following comment:

Having reviewed the document entitled 'Shorefield Country Park, Shorefield Road, Milford on Sea | Noise Impact Assessment | Report: VA4516.230807NIA.2' (dated 08 August 2023) [prepared by Venta Acoustics] I am satisfied that the report has considered appropriate and current guidance to assess potential noise sources introduced by the proposed development and that the methodology and findings are reliable. Environmental Health (pollution) therefore has no objection to the proposal based on noise concerns.

NFDC Environmental Health did not recommend any noise related conditions for the proposed extended seating area taking into account the technical analysis set out in the document.

As such, it is considered appropriate to condition the use of the proposed additional external seating area from 10.00 hours to 21:30 hours between the last Friday before the late May Bank Holiday and 1 September only.

Therefore, subject to an hours of use condition, this element of the proposal accords with Local Plan Policy ENV3 (Design Quality and local distinctiveness) criterion (ii).

q) Recreational kids play area and Boules Court

The intention of this proposed facility is to provide additional family activities. The use of the Boules court and the children's play area can be conditioned for those specific uses so that the space does not become host to alternative activities which could rise to significant amenity impacts.

Essentially, given the proximity of residential dwellings on Shorefield Road, it is considered that this element of the proposal would not give rise to any significant amenity impacts by virtue of excessive noise subject to a condition for hours of use to be limited to between 10am and 9.30pm between 1 May and 30 September and 10am and 5pm between 1 October and 30 April.

Cumulative Impacts

Lighting

The applicants have provided an updated Lighting Planning Report (November 2023) and an external lighting layout (Ref: 3228.5.102 Revision E).

The revised layout sets out an application site lighting scheme significantly reduced in scope from that originally submitted in the application. The originally proposed feature lighting including festoon lighting and tree lighting has been removed from the revised lighting layout.

The applicants have confirmed that the aim of the revised lighting strategy is:

The projects aim is to support the proposed new development and to supplement the existing lighting to the site. A shortfall of lighting exists to certain areas of the pedestrian causeway. The existing lighting is mainly inefficient. The proposed lighting would be more energy -efficient and the colour temperatures of the lighting be in keeping with recent guidance on nature.

The lighting scheme now comprises four different elements: bollard luminaries, car parking lighting column, replacement MUGA sports lighting floodlights and directional lamppost to creational area. The updated Lighting Planning Report confirms that each element would have managed lighting control to suit environmental conditions.

It is considered that the proposed lighting strategy is appropriate for the application site and subject to suitable conditions, would not have a significant harmful impact on local amenity. The relationship between lighting and ecology is addressed separately in the Ecology section of this report.

Noise

The submitted material includes a Noise Impact Assessment (Venta Acoustics, August 2023).

NFDC Environmental Health has been consulted and provided the following comment with regard to noise impacts:

Having reviewed the document entitled 'Shorefield Country Park, Shorefield Road, Milford on Sea | Noise Impact Assessment | Report: VA4516.230807NIA.2' (dated 08 August 2023) [prepared by Venta Acoustics] I am satisfied that the report has considered appropriate and current guidance to assess potential noise sources introduced by the proposed development and that the methodology and findings are reliable. Environmental Health (pollution) therefore has no objection to the proposal based on noise concerns.

The submitted Noise Assessment Survey was undertaken in February rather than a time during peak period in the summer months. Notwithstanding this, it is considered that given the existing use of the site, the proposed conditions limiting times of use

and the type of activities on some land parcels would reduce noise levels to acceptable level in line with the response from NFDC Environmental Health.

Other Design Matters

Representations from the public include comment about the Milford-on-Sea Village Design Statement (MSVDS) and the proposal. Essentially, the MSVDS is silent about the possible renewal of Shorefield County Park and the form that this could take. As such, it is considered that the proposal is not contrary to the guidance in the MSVDS.

Summary

As such, subject to suitable conditions limiting the hours of use and the uses within specific land parcels, the proposal accords with Local Plan Policy ENV3.

C. Ecology and Biodiversity Net Gain

The Wildlife and Countryside Act 1981 protects wildlife on development sites and confirms it is an offence to injure, kill or disturb wildlife species and their nests or habitats.

Local Plan Policy DM2 (Nature conservation, biodiversity and geodiversity) sets out inter alia that development proposals will be expected to incorporate features to encourage biodiversity and retain and, where possible, enhance existing features of nature conservation value within the site. Development will not be permitted which would adversely affect species of fauna or flora that are protected under law or their habitats unless their protection can be adequately secured through conditions and/or planning obligations.

The supporting information includes a Bat Survey Report (Ecological Consultancy Services Ltd, October 2022), Preliminary Roost Assessment (Arbtech, October 2023), BNG File Note and Biodiversity Metric (Arbtech 2023).

The NFDC Ecologist has commented that all the outstanding concerns have been addressed through the updated bat assessment. The NFDC Ecologist has also stated that he has no appreciable concerns for ecological impacts as a result of the proposed lighting.

The Preliminary Roost Assessment recommends a condition stipulating precautionary working methods during construction. This recommended condition has been included accordingly.

The Biodiversity Net Gain Assessment (BNG) has undertaken an evaluation of the existing and proposed development of the site to assess whether the scheme is able to come forward with a net gain. The recommended amount of habitat area proposed as part of the development will ensure that the scheme is able to come forward with a 65% net gain based on the biodiversity metrics. This indicates that the scheme well exceeds the required 10% and in turn, is considered to be acceptable.

As such, subject to suitable conditions, the proposal accords with Local Plan Policy DM2.

D. Highways and Access

Local Plan Policy CCC2 (Safe and Sustainable Travel) sets out that new

development will be required to address specific highways and access criteria.

The Highway Authority (Hampshire County Council) has no objections to this application

A Transport Statement (TS) (Patrick Parsons, August 2023) has been submitted. The TS sets out that the vehicular access into the Shorefield Country Park will remain the same, that the proposals are for the re-development of the existing facilities only and that facilities will continue to be used by the holiday park visitors only. As such, there are no additional trips / visitors expected and therefore there will be no highway impact.

However, as part of the proposals the internal access roads will be modified slightly. Delivery vehicles will still be able to access the site via the car park in the southwest and a swept path analysis showing delivery vehicles is provided.

As such, the proposal accords with Local Plan Policy CCC2.

E. Other Matters

Trees

Local Plan Policy ENV4 (Landscape character and quality) sets out that trees should be retained and enhanced as appropriate.

The NFDC Tree Officer had no objection on tree grounds to this proposal subject to suitable conditions as set out.

As such, subject to suitable conditions, the proposal accords with Local Plan Policy ENV4

Flood Risk

Local Plan Policy CCC1 (Safe and Healthy Communities) sets out criteria relating to flood risk. The National Planning Policy Framework (2023) and national Planning Practice Guidance also set out comprehensive planning policy guidance on all aspects of flood risk and development.

The application is supported by a Flood Risk Assessment (FRA), Avison Young, July 2023 by virtue of the application site area.

The FRA confirms that with regard to fluvial (rivers and watercourses) flooding the application site is within the Environment Agency (EA) flood zone 1 (area of lowest flood risk).

The FRA also confirms that with regard to surface water flooding the application site is within the EA 'very low' surface water risk category.

As such, given that the site is previously developed land, it is considered that there will be no significant flood risk, including surface water flooding, and as such the proposal broadly accords with Local Plan Policy CCC1 and the NPPF.

Heritage Assets

The NFDC Conservation Officer has confirmed the proposal would not impact any local heritage assets.

Minerals Planning

The HCC Minerals and Waste consultation response confirms that the proposed development lies within the mineral and waste consultation area (MWCA) - Sites section. It lies adjacent to the safeguarded site Downton Manor Farm operated by New Milton Sand & Ballast.

However, there is a significant separation distance between the edge of the application site and the boundary of the current mineral extraction site of approximately 310 metres.

Given this separation distance it is considered that there would clearly be no substantive impacts arising on the operation of the mineral site by virtue of material considerations such as noise, dust, visual impact, odour and traffic movements that may arise from the proposal. As such, there is no identified requirement for additional mitigation to specifically address any relationship between the proposal and the mineral extraction site to the east.

Community Engagement

Several representations have highlighted the lack of prior community engagement by the applicants. Essentially, it is considered that the application could have benefitted from prior community engagement before submission of the application. Likewise, the application could also have benefitted from undertaking a pre-app before submission.

Local Infrastructure

There is no evidence to demonstrate that there is insufficient service infrastructure (utilities, water etc) which would preclude the proposed development.

11 OTHER MATTERS

The proposal does not fall within any of the development types for which the Community Infrastructure Levy (CIL) applies.

12 CONCLUSION / PLANNING BALANCE

In principle, the proposal is in accordance with Local Plan Policy CS19 (Tourism) which takes a positive approach to supporting the local tourism industry including the renewal of facilities in existing holiday parks. The proposed facilities are typical of those one might expect to find in a modern holiday park facility. As such, the overall impact on the local economy, for example through the possible retention of existing employment on the site, would be positive.

The proposal would not give rise to any additional vehicular movements in the local road network – there is no additional accommodation proposed. The proposed facilities are to serve the current number of patrons undertaking overnight visits. As such, there is no need for off-site highways improvements.

The impact on local general amenity from any additional noise and light pollution arising from the proposal can be suitably mitigated through the recommended conditions relating to hours of use which take account of the time of year and restrictions on certain uses.

There would be no significant impact on trees and ecology subject to suitable conditions. There is no identified need for any mitigation to address possible impacts on the operation of the nearby mineral extraction site. The proposal accords with

Local Plan Policy ENV2 (Green Belt) and national planning guidance with regard to the impact on the South West Hampshire Green Belt. There is no overall impact on openness by virtue of the proposal i.e., its net affect is essentially neutral.

It is considered that the application could have benefitted from both prior community engagement and undertaking a pre-app with the local planning authority but that this does not comprise a suitable reason for refusal.

Therefore, taking all matters into account including the objections and concerns expressed by local representations and Milford-on-Sea Parish Council the planning balance in this case is one of approval, subject to suitable conditions, as set out in the recommendation below.

13. RECOMMENDATION

Grant Subject to Condition

Proposed Conditions:

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development permitted shall be carried out in accordance with the following approved plans: (insert plan numbers).

1. Proposed Block Plan, Ref: 3228.5.03D, Leisure Concepts, December 2022

2. Proposed General Arrangement (GA) Plan, Ref: 3228.5.100C, Leisure Concepts, December 2022

3. Proposed Finishing Plan, Ref: 3228.5.101C, Leisure Concepts, December 2022

4. Proposed Lighting Plan, Ref: 3228.5.102 E, Leisure Concepts, December 2022

5. Proposed Laundrette Details, Ref: 3228.5.103C, Leisure Concepts, December 2022

6. Proposed Control Hut Details, Ref: 3228.5.106C, Leisure Concepts, December 2022

7. Proposed MUGA Details, Ref: 3228.5.107D, Leisure Concepts, December 2022

8. Proposed Splash Pad Details, Ref: 3228.5.108D, Leisure Concepts, December 2022

9. Proposed Changing Building Details, Ref: 3228.5.109C, Leisure Concepts, December 2022
10. Proposed Caravan Sales Building Details, Ref: 3228.5.110E, Leisure Concepts, December 2022
11. Existing and Proposed Shop Building Details, Ref: 3228.5.111C, Leisure Concepts, December 2022
12. Proposed Mini Golf Details, Ref: 3228.5.112C, Leisure Concepts, December 2022
13. Existing and Proposed Reception Extension Details, Ref: 3228.113.D, Leisure Concepts, December 2022
14. Proposed Play Area Details, Ref: 3228.5.115C, Leisure Concepts, January 2023
15. Proposed External Terrace Details, Ref: 3228.5.116E, Leisure Concepts, January 2023
16. Proposed Bike Rack Details, Ref: 3228.5.117C, Leisure Concepts, January 2023
17. Proposed Activity Area Details, Ref: 3228.5.122, Leisure Concepts, December 2022

Reason: To ensure satisfactory provision of the development.

3. Trees

The trees on the site which are shown to be retained on the approved plans shall be protected during all site clearance, demolition and building works in accordance with the measures set out in the submitted the Trevor Heaps Arboricultural Consultancy Arboricultural Impact Assessment Method Statement & Tree Protection Plan dated 6th August 2023 Ref TH3580 b.

Reason: To safeguard trees and natural features which are important to the visual amenities of the area.

4. Trees and Visual Amenity

No development shall take place until a scheme of landscaping of the site shall be submitted to and approved in writing by the Local Planning Authority. This scheme shall include: (a) the existing trees and shrubs which have been agreed to be retained; (b) a specification for new planting (species, size, spacing and location); (c) areas for hard surfacing and the materials to be used; (d) other means of enclosure; (e) a method and programme for its implementation and the means to provide for its future maintenance. No development shall take place unless these details have been approved and then only in accordance with those approved details.

Reason: To ensure that the development takes place in an appropriate way and to safeguard trees and natural features which are important to the visual amenities of the area

5. Artificial Lighting

The following external artificial lighting installed at the hereby approved development (Proposed Lighting Plan, Ref: 3228.5.102E, Leisure Concepts, December 2022):

- A. Lampposts to illuminate Car Parks, Approx. 5m high; and
- B. Directional Lamppost to Recreational Area, Approx. 4m high

shall all be installed and fitted with shields such that the lamps (commonly known as the 'bulb') shall not be visible from any residential premises. The shielding shall thereafter be retained and maintained.

Reason: To protect the amenity of residents.

6. Reception Extension Works

Works to the reception extension (Existing and Proposed Reception Extension Details, Ref: 3228.113.D, Leisure Concepts, December 2022) will be scheduled during the winter months (November to March) when bats are least likely to be present, insofar as is possible. No work is to take place to the flat-roof structure with the hanging clay tiles to the south, or the lower roof to the north where features had been identified

In the unlikely event that a bat or evidence of bats is discovered during the development all work must stop and a bat licensed ecologist contacted for further advice.

Reason: In the interests of Protected Species.

7. Biodiversity

The following biodiversity measures shall be completed prior to the commencement of the use of the proposed activity lawn, splash pad and mini-golf.

- C. The installation of a minimum of two bird boxes on mature trees around the site boundaries will provide additional nesting habitat for birds e.g., Woodstone Nest Box (buildings or trees). Tree boxes should be positioned approximately 3m above ground level where they will be sheltered from prevailing wind, rain and strong sunlight. Small-hole boxes are best placed approximately 1- 3m above ground on an area of the tree trunk where foliage will not obscure the entrance hole.
- D. The installation of 3 bat boxes at the site to provide additional roosting habitat for bats. The bat boxes will be installed on mature trees around the site. These are better situated at trees of the site edges where these will be less disturbed compared to central areas and furthers away from most lights. Bat boxes should be positioned 3-5m above ground level facing in a south or south-westerly direction with a clear flight path to and from the entrance, away from artificial light. The bat boxes will be a

specification suitable for pipistrelles and long-eared bats (such as woodstone low profile or a similar alternative brand).

Reason: In the interests of Protected Species and Biodiversity.

8. Laundrette Hours of Use

No activity shall take place on the site in connection with the approved Laundrette other than between the hours of [07:30] and [21:00] Monday to Sundays.

Reason: To safeguard the amenities of nearby residential properties and the occupiers of on-site accommodation in accordance with Policy CS2 of the Local Plan for the New Forest District outside the National Park (Core Strategy).

9. Activity Area Hours of Use

No activity shall take place on the site in connection with the approved Activity Area Details (as set out in the Proposed Activity Area Details, Ref: 3228.5.122, Leisure Concepts, December 2022) other than between the hours of [10:00] and [21:00] Monday to Sundays.

Reason: To safeguard the amenities of nearby residential properties in accordance with Policy CS2 of the Local Plan for the New Forest District outside the National Park (Core Strategy).

10. Splash Pad Water Play Area and W/Cs and Changing Rooms Hours of Use

No activity shall take place on the site in connection with the approved splash pad, wc's and changing rooms (as set out in the Proposed Splash Pad Details, Ref: 3228.5.108D, Leisure Concepts, December 2022) other than between the hours of [10:00] and [19:00] Monday to Sundays between 1 May and 30 September, and other than between the hours of [10:00] and [16:00] between 1 October and 30 April.

Reason: To safeguard the amenities of nearby residential properties and the occupiers of on-site accommodation in accordance with Policy CS2 of the Local Plan for the New Forest District outside the National Park (Core Strategy).

11. Activities Lawn Hours of Use

No approved activity shall take place on the site in connection with the Activities Lawn (as set out in the Proposed General Arrangement (GA) Plan, Ref: 3228.5.100C, Leisure Concepts, December 2022) other than between the hours of [10:00] and [19:00] Monday to Sundays between 1 May and 30 September, and other than between the hours of [10:00] and [17:00] between 1 October and 30 April.

Reason: To safeguard the amenities of nearby residential properties and the occupiers of on-site accommodation in accordance with Policy CS2 of the Local Plan for the New Forest District outside the National Park (Core Strategy).

12. Mini Golf, Control Hut and Storage Yard Area Details Hours of Use

No activity shall take place on the site in connection with the approved Mini Golf, Control Hut and Storage Yard (as set out in the Proposed Control Hut Details, Ref: 3228.5.106C, Leisure Concepts, December 2022 and Proposed Mini Golf Details, Ref: 3228.5.112C, Leisure Concepts, December 2022) other than between the hours of [10:00] and [21:00] Monday to Sundays between 1 May and 30 September, and between the hours of [10:00] and [17:00] between 1 October and 30 April.

Reason: To safeguard the amenities of nearby residential properties and the occupiers of on-site accommodation in accordance with Policy CS2 of the Local Plan for the New Forest District outside the National Park (Core Strategy).

13. Extended External Terrace Hours of Use

The approved extended external terrace shall only be used by customers between the hours of [10:30] and [21:30] Monday to Sundays between the last Friday before the late May Bank Holiday and 30 September only.

Reason: To safeguard the amenities of nearby residential properties and the occupiers of on-site accommodation in accordance with Policy CS2 of the Local Plan for the New Forest District outside the National Park (Core Strategy).

14. MUGA Hours of Use

No activity shall take place on the site in connection with the approved refurbished MUGA (as set out in the Proposed MUGA Details, Ref: 3228.5.107D, Leisure Concepts, December 2022) other than between the hours of [10:00] and [21:00] Monday to Sundays between 1 May to 30 September, and between [10:00] and [20:00] between 1 October and 30 April on Monday to Saturdays only and not on Public Holidays during that period.

Reason: To safeguard the amenities of nearby residential properties in accordance with Policy CS2 of the Local Plan for the New Forest District outside the National Park (Core Strategy).

15. Recreational Childrens Play Area and Boules Court Hours of Use

No activity shall take place on the site in connection with the approved external play area - Recreational Childrens Play Area and Boules Court - (as set out in Proposed Play Area Details, Ref: 3228.5.115C, Leisure Concepts, January 2023) other than between the hours of [10:00] and [21:00] Monday to Sundays between 1 May and 30 September, and between [10:00] and [17:00] between 1 October and 30 April.

Reason: To safeguard the amenities of nearby residential properties in accordance with Policy CS2 of the Local Plan for the New Forest District outside the National Park (Core Strategy).

16. Restriction of the Use of the Activities Lawn

The following activities are strictly prohibited on the Activities Lawn at all times:

- Organised adult team sports, shooting and field archery
- Equestrian activities and gymkhanas
- Circuses, funfairs, carnivals
- Weddings and other religious or civil ceremonies
- Firework displays
- Outdoor commercial exhibitions and auctions
- Car boot sales & markets
- Live music event including concerts and discos.
- Amplified recorded music
- Removable seating and/or staging

Reason: To safeguard the amenities of nearby residential properties in accordance with Policy CS2 of the Local Plan for the New Forest District outside the National Park (Core Strategy).

17. Restriction of the Use of the Control Hut and Storage Yard

The use of the approved Control Hut and Storage Yard is limited to the following activities only:

- O. Administration, including access, of the use of the splash pad and associated facilities (WC's, changing rooms) and mini-golf.
- P. Storage of equipment in the storage yard associated with the above uses.

Reason: To safeguard the amenities of nearby residential properties in accordance with Policy CS2 of the Local Plan for the New Forest District outside the National Park (Core Strategy).

18. Control Barrier

Prior to any works taking place a detailed specification of the proposed Control Barrier including any changes of levels shall be submitted for approval with the LPA and installed in accordance with the approved details.

Reason: To ensure a satisfactory form of development compliant with Local Plan policy ENV3

19. Details of play equipment

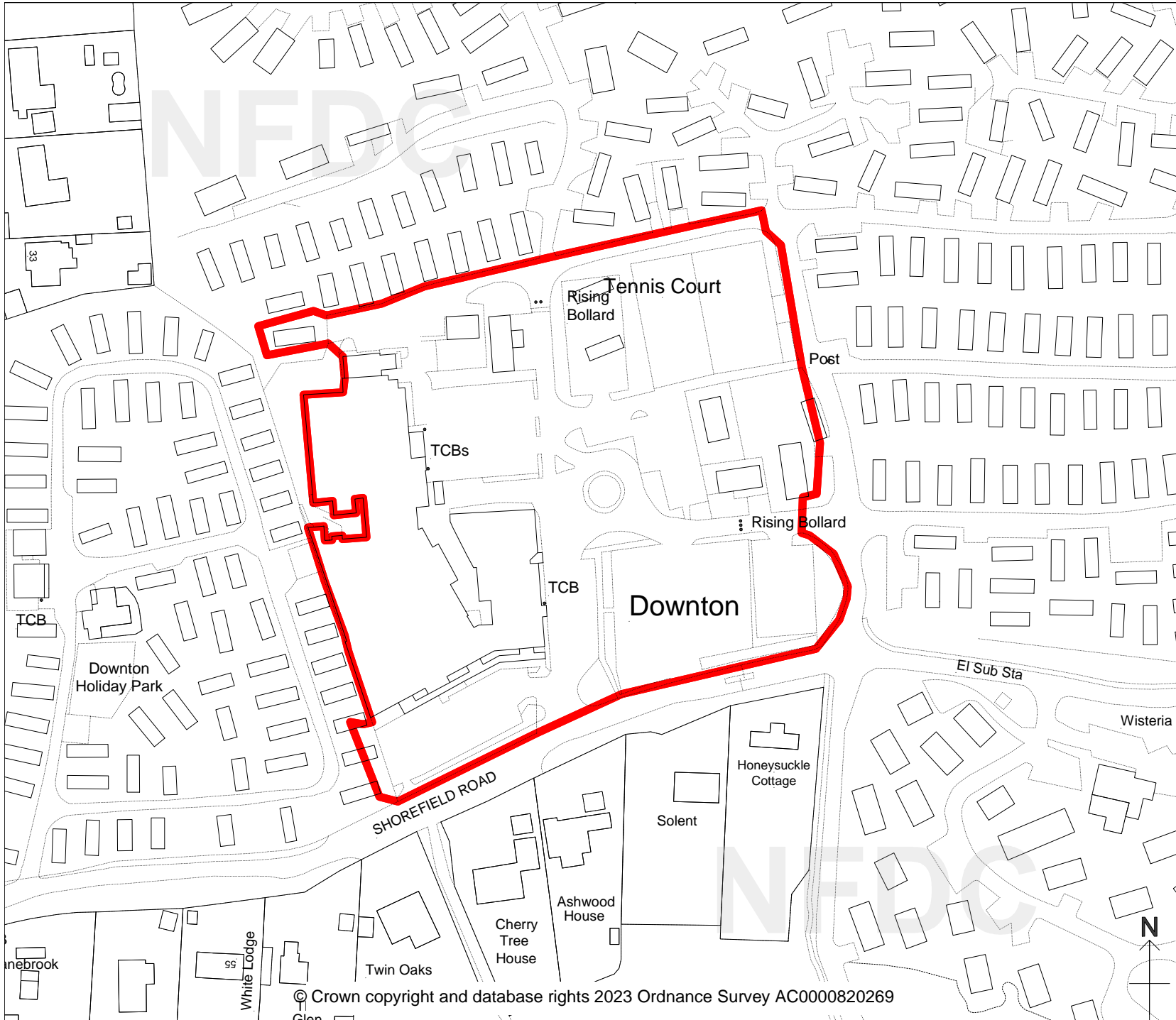
Prior to any works taking place a detailed specification of the play equipment (including any changes of levels) to be provided within the proposed external play area (Site Plan Ref: 3228.5.115C) and any other facilities such as benches and bins, shall be submitted for approval with the Local Planning Authority and installed in accordance with the approved details.

Reason: In the interests of local general amenity in accordance with Local Plan Policy ENV3.

Further Information:

Robert Thain

Telephone: 023 80 285116



New Forest

DISTRICT COUNCIL

Tel: 023 8028 5000
www.newforest.gov.uk

David Norris
 Service Manager
 Development Management
 New Forest District Council
 Appletree Court
 Lyndhurst
 SO43 7PA

PLANNING COMMITTEE

December 2023

Shorefield Country Park
 Shorefield Road
 Downton
 23/10941

Scale 1:1500

N.B. If printing this plan from the internet, it will not be to scale.