

# Design and Access / Design Statement

V1.0

## Masterplan Restructuring of Facilities at Ladycross Plantation Holiday Park

Egton,  
Whitby,  
North Yorkshire,  
YO21 1UA



**Lambe Planning & Design**  
Consultants for Planning, Design and Landscape

**Client:** Mr Kieran Robinson, Ladycross Plantation Holiday Park, Egton, Whitby, North Yorkshire, YO21 1UA

### **Proposal Description:**

#### **Masterplan restructuring of existing / previously consented Holiday Lodges and Caravans at Ladycross Plantation Holiday Park.**

This *Design and Access Statement* covers the following aspects :- Context, Involvement, Design, Layout, Scale, Landscape, Landscaping, Appearance, Access, Use, Amount, Tourism and Benefits to the Local Economy - and supporting information regarding, Local Development Plan, Central Government and Tourist Board Policies and Guidance etc. This Statement has been prepared and set out in accordance with guidance relating to Design and Access Statements.

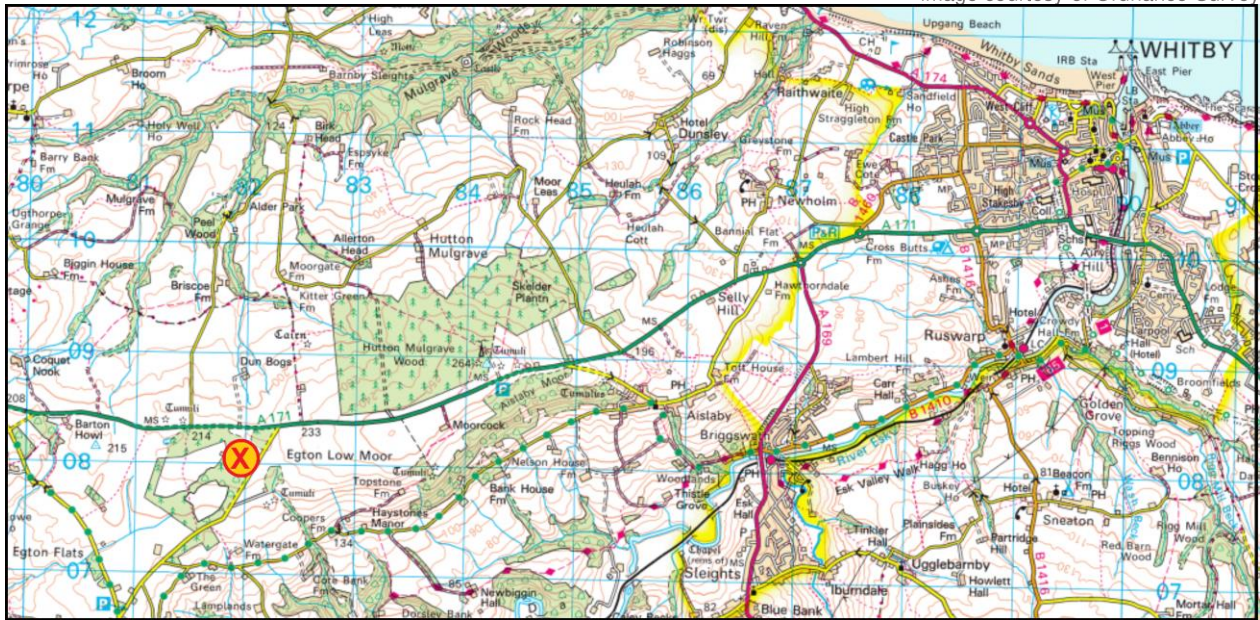
#### **1.00. Introduction and background to the proposals.**

- 1.01.** Ladycross Plantation Holiday Park is an existing and well established Holiday Park and Tourism & Leisure enterprise [www.ladycrossplantation.co.uk](http://www.ladycrossplantation.co.uk) which has been operational for many years. The Park has Planning Consent and a Site Licence. This proposal is merely the upgrading and restructuring of an existing Rural Business.
- 1.02.** This proposal relates to several elements which in summary involve the restructuring of existing / previously consented pitches and are to enhance and diversify the existing portfolio of Holiday Accommodation available at the Holiday Park. This is to provide a restructured and improved facility for Premium Holiday Lodges and Holiday Caravans.
- 1.03.** For simplicity, the Masterplan Proposals have been split into separate areas which are identified at Figure 2.
- 1.04.** Ladycross Plantation Holiday Park is a family owned and operated enterprise which is located within mature woodland which extends to approximately 95 acres. As the site is in family ownership, there is a long term interest and undertaking for the ongoing sympathetic development and improvement of the Park for future generations. Whilst the site is located within the National Park, this document demonstrates that the proposal is not in conflict with policies within the Local Development Plan.
- 1.05.** This scheme for a high quality 5\* holiday proposal would generate significant spends into the local economy. A recent report published in February 2019 found that Holiday Parks generate £9.3bn in visitor expenditure equating to £5.3bn Gross Value Added (GVA) to the UK economy and that the holiday park sector supports 171,448 FTE jobs in the UK, with Visitors who stayed in Lodges / Caravans / Chalets, spending on average £557 per visit (£101 per day).
- 1.06.** From figures contained within industry statistics, it is anticipated that this scheme for premium Holiday Caravans and Woodland Lodges would generate additional spends into the local economy of approximately £1.6m on an annual basis, for a 30 week season - please see Appendix 1. This provides Industry Statistics demonstrating the level of spends & employment generation to the local rural economy.
- 1.07.** The Application Site benefits from the following features:
- 1).** Its location fully enveloped within mature woodland ensures that it cannot be seen from without, and is visually unobtrusive and attractive for the proposed purpose
  - 2).** With good road access and links to the main highway network

- 3). In an area where there is demand for such a facility.
- 4). The site is appropriate to the rural area, and related to other existing development
- 5). it does not impact adversely upon the area or neighbouring properties.

**Figure 1.** Site location in the context of the wider area – Ladycross Plantation Holiday Park X

image courtesy of Ordnance Survey



- 1.08. The proposed Holiday Lodge and Caravan upgraded layouts are of a very low density with the units located informally with significant additional belts of new landscaping and planting in native species of trees and shrubs. The essence of the scheme being to continue with the development of an exclusive 5 star holiday facility.
- 1.09. The proposals relate to the creation of an upmarket tourism product and are exactly in line with Central Government Policies, Tourist Board Policies and Policies contained within the Local Development Plan. These directly encourage the creation of such facilities and accommodation.
- 1.10. The quality of facility proposed would significantly help raise the standards of holiday accommodation offered in the region. Schemes of this nature encourage tourism usage in the “off-season” shoulder months – which is in line with current policies and guidance as this spreads the demand and impact on infrastructure and avoids the in-continuity of seasonal jobs and income to the tourism market. This ultimately results in the creation of quality year round jobs, and supports the local rural economy.
- 1.11. There is a very strong local and national trend towards higher quality holidays, especially for more spacious and better equipped holiday accommodation. Holidaymaker’s demands and aspirations have risen rapidly over the last 20 years. The applicant wishes to attract these holidaymakers with higher disposable incomes who appreciate the qualities of the area.
- 1.12. A report prepared by Tourism Solutions – Self-Catering Shortage Study, advised that *“Trends in product development have pointed towards the development of higher quality units; people have increasingly experienced quality self-catering apartments & villas*

*abroad and living standards generally have risen in the UK over the past 10 years. People continue to expect - and demand, quality that is at least as good as their own homes, and preferably better".*

## Amount (and type of Development)

**Figure 2.** extract Site Location Plan below identifies the two areas subject of this planning application. Please note that the entire site and area of the proposals is totally enveloped in mature woodland ensuring the site is unseen from without.



**1.13.** The elements to the proposal comprise :-

### 1). Holiday Lodges.

Currently out of the “existing” 41 Holiday Lodges permitted, 12 of these are sited / implemented. The 12 comprise of :

- 7 Lodges have been sited,
- 2 bases have been constructed,
- 3 are implemented / allocated and in the process of being prepared

This element of the restructuring relates to an updated and amended layout to improve the layout, spacing, setting and aspect of the previously consented Lodges in this area, and make them more attractive to holidaymakers and improve the holiday product.

Accompanying Layout Plan LC-2021-V5 Rev5 refers. This layout plan is for 36 Holiday Lodges, it also illustrates the 12 Lodge locations which have already been sited / allocated.

There is therefore a minor increase in 7 Lodges. This area falls within the Planning Unit / operational extent of the existing holiday park, is already consented for Holiday Lodges and is surrounded by mature woodland, well hidden within the landscape and cannot be seen from without.

## 2). Holiday Caravans.

Ladycross Holiday Park has planning consent for 10 Static caravans and 5 pods, this element of the proposals relates to the restructuring and relocation of these consented pitches together with a modest increase in numbers. This proposal is for a restructured layout of 27 units - a modest increase of 12 units.

## 3). New Highways Access

As part of these proposals a new highways access point would be created onto Egton Road.

- 1.14. The Holiday Lodges would be constructed from timber and stained in a palette of muted environmental colours to blend fully into the natural environment. These units would be set within a fully landscaped setting of broadly indigenous species of trees and shrubs.
- 1.15. The units would be accessed from the existing park drive which leads to the public highway onto Egton Road and the A171. An additional access route is also proposed. A detailed Transport Assessment has been undertaken by specialist Transport Consultants. The Statement concludes that [“the development proposals will generate a negligible amount of additional traffic, with only a marginal increase compared to the previously consented development. The impact of the proposed development on both the local and wider highway network will be negligible”](#).
- 1.16. Mains services would be provided, and due to the nature of the proposals the ground works would be minimal.
- 1.17. An enquiry has been undertaken with the Environment Agency which identifies that the site and surrounding area falls within Flood Zone 1 which is classified as being at the lowest risk of flooding.

**Figure 3.** example photograph illustrating the typical design, style and appearance of Holiday Lodges which can be stained in environmental colours to blend into the natural environment.



**Figure 4.**



**Figure 5.** example photographs illustrating typical bespoke Holiday Lodges which would be manufactured in muted environmental colours.



**Figure 6.**



**Figure 7.**



**Figure 8.** example photographs illustrating the typical design, style and appearance of a Lodge which would be stained in muted environmental colours to blend into the natural environment.



**Figure 9.**





**Figure 10.** photographs illustrating the typical internal facilities of Holiday Lodges & modern Holiday Caravans and the high standard of accommodation provided by such units.



**Figure 11.**



Figure 12. images illustrating the typical internal facilities and quality of a Lodge / Caravan



Figure 13.



Figure 14. images illustrating the typical internal facilities and quality of a Lodge / Caravan



Figure 15.



Figure 16. images illustrating the typical internal facilities and quality of a Lodge / Caravan



Figure 17.



Figure 18. images illustrating the typical internal facilities and quality of a Lodge / Caravan



Figure 19.



## 2.00. Accessibility / Access and Movement to and From the Development

- 2.01.** The site benefits from an existing access onto Egton Road and the main A171 Whitby Guisborough Road. A new additional access is proposed onto Egton Road.
- 2.02.** Harrogate, Leeds and York are approximately 1 to 1.5 hours drive away together with the M1, A1M, M62 and the remaining motorway network. Many other major conurbations are within a mere 2 hours drive.
- 2.03.** The sites location within a popular holiday area and its convenience to many major conurbations with minimal drive times, would ensure a continuous and steady demand for the Holiday Caravans and Woodland Lodges which are proposed.
- 2.04.** The Park has the benefit of direct access to public transport via a bus stop located on the main A171 and has a woodland trail which runs all the way down the side of Egton Road.

**Figure 20.** image illustrating the existing Woodland Trails within the site.



**Figure 21 and 22.** Woodland Trails within the site which provide pedestrian access to the A171 Bus stop.



**Figure 22.**



**2.05.** The supervision, management and control of the highway access points would be undertaken from the parks main reception and would also be supervised and controlled via CCTV and automated barriers.

**Figures 23.** Image below illustrating the existing entrance to Ladycross Plantation Holiday Park and the good visibility splay looking south towards Egton



**Figures 24.** Image below illustrating the existing entrance to Ladycross Plantation Holiday Park and the good visibility splay looking north towards the A171.





**Figures 25.** Image below illustrating an existing access point off Egton Road, which is proposed as the additional alternative access. This is located on a straight stretch of road enabling the necessary visibility splays to be provided.



**Figures 26.** Image looking north up Egton road towards the A171 illustrating the good visibility splays which can be achieved in this location.



**Figures 27.** Image looking south down Egton road towards Egton illustrating the good visibility splays which can be achieved in this location.



#### **2.06. Disabled Access**

**2.07.** Policies relating to access by people with disabilities have been fully considered for this scheme and facilities will be available for all-inclusive access. Every consideration is being given towards holidaymakers with disabilities and the scheme will be fully compliant with current legislation.

#### **2.08. Community Safety**

**2.09.** The design of the layouts together with the proactive supervision and management of the owners, the proximity of the parks existing reception and the owners dwelling would ensure that supervision of the holiday facility and holidaymakers can be readily achieved.

#### **2.10. Movement within the development and Car Parking**

**2.11.** Car Parking would be adjacent to each individual Holiday Unit with direct access off the drive.

#### **3.00. Visual Amenity / Neighbouring Properties / Public Rights of Way**

Ladycross Plantation Holiday Park is located within a 95 acre block of land all within the Applicants Ownership. The Park sits within and is surrounded and enveloped in its entirety in mature woodland. The woodland comprises of a plantation of broadly coniferous trees planted within the last 30/40 years for recreation purposes. The site is broadly flat, and is not visible nor prominent on any sky line. In simplistic terms the site is

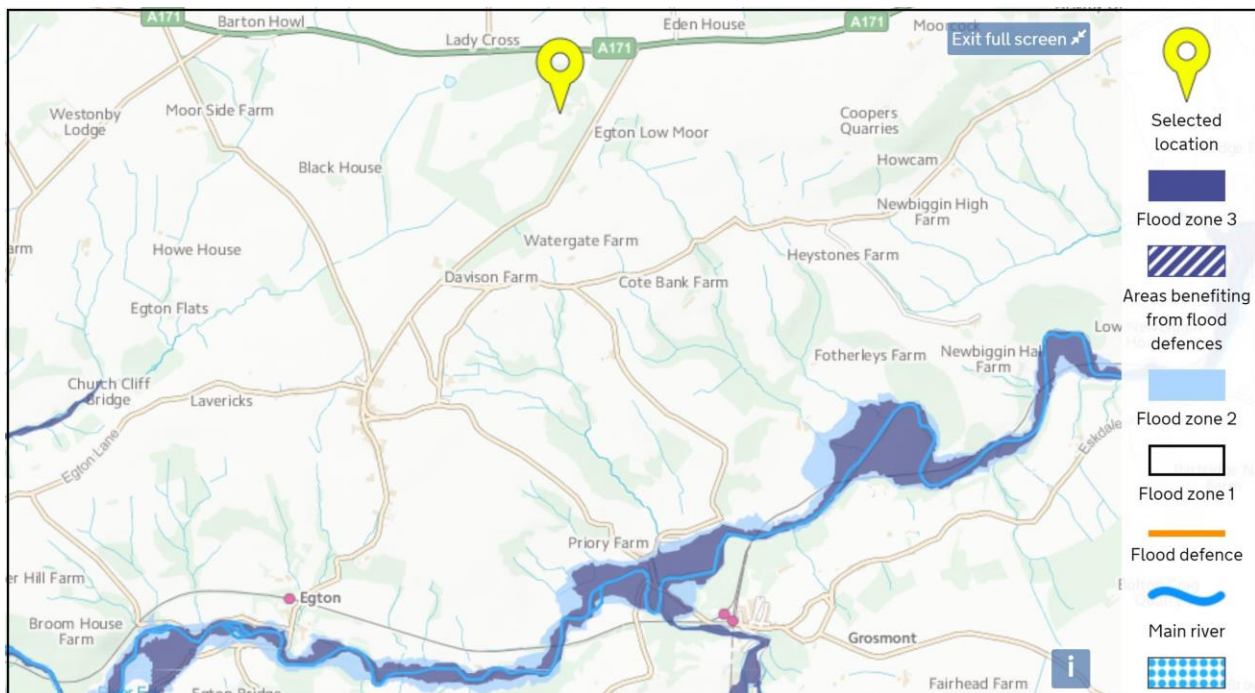
fully screened and cannot be seen from without, this ensures that there will be no detrimental impact upon visual amenity.

- 3.01.** All Areas are fully enveloped and screened by existing mature woodland. The Holiday Lodges and Holiday Caravans are not conventional bricks and mortar development and would all be sited in fully screened locations. When these features are combined with units in muted environmental colours, low density informal layouts with units in small groups and clusters - and significant additional landscaping, set within a fully screened location - this would all ensure that there is no detrimental impact on the National Park, visual amenity, or any neighbouring properties.
- 3.02.** There are no Public Footpaths or Rights of Way which would be interrupted or hindered by the proposed development.

#### 4.00. Flood Zone

- 4.01.** An enquiry has been undertaken with The Environment Agency which identifies from their Flood Plain Maps that the site and surrounding area fall within Flood Zone 1 which is classified as being at the lowest risk of flooding.
- 4.02.** The proposals therefore comply with Local Development Plan Policy and National Planning Policy Guidance in that the site is classified as being at the lowest risk of Flooding.

**Figure 28.** Below Environment Agency Flood Plain Map – identifying the location of Ladycross Plantation Holiday Park which is categorised as being at the lowest risk of flooding.



#### 4.03. Foul Sewer, Electricity and Mains Water

- 4.04.** The site has the benefit of mains electricity, water and existing access to the foul sewer.
- 4.05.** General Household Waste - full recycling facilities for the management, storage and separation of household waste generated by the holiday makers would be provided.

**4.06. Environmental Sustainability / Sustainable Development**

- 4.07.** The proposal is environmentally sustainable, makes the best use of resources and meets with Policies which relate to Sustainability. The site is appropriately located in a Holiday Area, which is considered to be a Tourism Regeneration Area. It has easy access, and has the benefit of accessibility to public footpaths and public transport being available.
- 4.08.** Day to day facilities and attractions are located within a short travelling distance. No land is being utilised which has been allocated for other land uses.
- 4.09.** The application comprises of a particular type of desirable and exclusive Holiday Accommodation, comprising of 5\* Holiday Lodges and Holiday Caravans for which a rural location is essential. The site is an existing Tourism and Leisure Enterprise, and this proposal merely seeks a restructured layout for previously consented pitches together with a modest increase in numbers to fund the improvements.
- 4.10.** The proposal will have no adverse impact upon existing wildlife habitats and the additional planting and screening will enhance the rural character of the area.

**5.00. General Development Control Guidance**

The proposal satisfies General Development Control Guidance in that :-

1. THE DEVELOPMENT PAYS DUE REGARD TO ITS SURROUNDINGS IN TERMS OF SCALE, SITING, DESIGN AND MATERIALS,
2. THE DEVELOPMENT DOES NOT HAVE AN ADVERSE VISUAL IMPACT ON THE STREET SCENE OR LANDSCAPE,
3. THE DEVELOPMENT DOES NOT HAVE AN ADVERSE EFFECT ON NATURE CONSERVATION INTERESTS,
4. THE DEVELOPMENT PAYS DUE REGARD TO THE AMENITY OF OCCUPIERS OF ADJOINING PROPERTY
5. PROVISION IS MADE FOR SATISFACTORY ACCESS AND CAR PARKING
6. THE DEVELOPMENT PAYS DUE REGARD TO THE EXISTING PUBLIC RIGHTS OF WAY NETWORK,
7. THE REQUIRED INFRASTRUCTURE IS EITHER EXISTING, AVAILABLE AND/OR CAPABLE OF CONSTRUCTION TO SERV THE PROPOSED DEVELOPMENT,
8. THE DEVELOPMENT RESPECTS THE CHARACTER AND SETTING OF THE AREA
9. THE DEVELOPMENT WILL NOT CAUSE OR EXACERBATE THE RISK OF FLOODING

**6.00. The Scheme (including Character & Design etc)**

- 6.01.** A Location Plan based on Ordnance Survey data has been prepared illustrating the respective areas.
- 6.02.** The proposed designs are to create very attractive low density layouts with the units in small groups and clusters with open areas and large belts of new landscaping. This will have wildlife, habitat, amenity and landscape benefits and further aid screening. The aim

being to create an extremely high quality and exclusive 5 star premium holiday facility. The Lodges would be manufactured in timber and stained in muted environmental colours.

**6.03.** Developments of this nature are the exact opposite and in stark contrast to conventional holiday park layouts with the units located very closely together in regimented rows which have a huge impact on visual amenity and are significantly less desirable in the tourism market.

**Figure 29.** Holiday Lodge Layout Plan illustrating the restructured layout for 36 Holiday Lodges. The plan also illustrates the 12 Lodge locations which have already been sited / implemented.



**Figure 30.** Holiday Caravan Layout Plan, this is a restructured layout for 27 units.

- 6.04.** A significant amount of consideration has been taken with the preparation of the layout plans. The proposals would be totally screened and together with the landscaping proposed and due to the site being totally enveloped in mature woodland would ensure absolutely no intrusion on the National Park, locality or neighbouring property. Part of the scheme would be to establish supplemental indigenous planting belts within the Holiday Park, which would internally fully screen the proposals and create an attractive and desirable holiday environment.
- 6.05.** The type, style and quality of the holiday units proposed would not impinge upon the current market of existing tourism accommodation in the locality, but would significantly help raise standards of the type and style of tourist facility and accommodation offered. This will have significant beneficial impacts on rural employment and spends within the local economy.
- 6.06.** Schemes of this nature encourage tourism usage in the “off-season” shoulder months - Current Government and Tourist Board Policies being to encourage tourism in the shoulder months - to not only spread the demand and impact on infrastructure but also to get away from the in-continuity of seasonal jobs and income to the tourism market. This ultimately results in the creation of quality year round jobs.
- 6.07. Pre-Application Planning Enquiry.** Two detailed pre-application planning enquiries have been undertaken with the North York Moors Nation Park, reference NYM\2020\ENQ\17027 19<sup>th</sup> November 2020, and 29 November 2021 with Mrs Hilary Saunders. The Consultation Responses and advice received were valuable and this has been used to inform and design a significantly amended scheme, which addresses all the observations received.

**6.08.** In brief summary the changes to the final scheme have:

- avoided development of any open fields,
- avoided encroachment into the area classified as Heathland,
- the touring pitches and caravan storage area have been omitted from the proposals and,
- the area of woodland encroached upon has upon the advice received, been further reduced by bringing the units back in significantly from the edges of the site.

**6.09.** The Pre-Application advice kindly advised that in terms of Policy UE2, it is acknowledged that the existing site at Ladycross does not meet the criteria of small scale and consequently there would be no objection to some reorganisation of the site and possibly an increase in numbers if well-hidden.

**6.10.** On the basis of the advice received the scheme has progressed and has been amended and re-designed to address all the observations – and the Applicant is now pursuing a much smaller proposal. On the basis of the advice received the following Reports and Surveys have been undertaken to support the Planning Application

**6.11. Reports and Surveys**

**6.12. Arboricultural Survey, Arboricultural Impact Assessment & Tree Protection Plan**

**6.13. Flood Risk Assessment and Drainage Strategy.** The FRA concludes that the risk of fluvial flooding, surface water flooding and sewer flooding is very low, and that the risk of flooding from all sources has been assessed and the flood risk to the site is considered to be very low. Therefore, no flood risk mitigation measures are necessary. Regarding the Drainage Strategy, this is via a SUDS system. Yorkshire Water have confirmed that foul flows can discharge to the 150mm public foul sewer.

**6.14. Preliminary Ecological Appraisal** has been undertaken. No trace of Badgers were found on site. The woodland habitats within the survey area are generally unsuitable habitats for hazel dormouse and no hazel dormouse field signs were found. Surveys of the water courses were also undertaken and concluded that the proposed works will have no negative impact on great crested newts.

**6.15. Ecological Impact Assessment EclA.** This document identifies that the proposed works will have no impact on any of the moorland habitats, and any impacts to other habitats in the area will be mitigated for. The Biodiversity Enhancement Measures and mitigation planting proposed includes the creation of large areas of Habitat Creation and Scrub Planting.

**6.16. Transport Statement.** This document concludes that “the development proposals will generate a negligible amount of additional traffic, with only a marginal increase compared to the previously consented development, and that the impact of the proposed development on both the local and wider highway network will be negligible”.

**6.17. Lighting Impact Assessment** has been undertaken by specialist lighting consultants / engineers. The report assessed, artificial lighting, the likely effects of the proposed development. The lighting assessment included information on the baseline lighting conditions within the area, to quantitatively assess the potential effects of the proposed lighting on surrounding sensitive receptors and if required considered possible mitigation

measures to reduce potential light spill onto ecological receptors and upward light (which can create sky glow).

**6.18.** The Lighting solutions were selected to:-

- Reduce light pollution.
- With specifically, designed luminaires to be selected to minimise upward spread of light.
- The optics in the lanterns will control the distribution of light to avoid overspill, sky glow and glare.
- Restrict lighting to the task area using horizontal cut-off optics and zero tilts.
- Operate a curfew and minimise the duration of any lighting (switch off or part-night dimming).

**6.19.** The Assessment report concludes that Lux levels along the woodland surrounding the holiday units will be below 1 lux, therefore lighting is not anticipated to have a significant impact on any light-sensitive species using this space.

**6.20. Topographical Survey.** Was undertaken upon which the Layout Plans are based.

### **7.01. Policy context and General Supporting Information**

**7.02.** The Local Development Plan consists of the very recently adopted North York Moors National Park Local Plan which was Adopted in July 2020. Planning Policy is fully supportive of Tourism and Leisure and the expansion and improvement of existing facilities.

**7.03. Strategic Policy J - Tourism and Recreation**, specifically advises that Proposals for Tourism and Recreation will be supported. These proposals fully comply with the Policy criteria in that :-

1. It is consistent with the principles of sustainable tourism,
2. It is located within a fully screened setting and does not lead to unacceptable harm to the local landscape character or an ecological or archaeological asset;
3. It provides and protects opportunities for all people to increase their awareness, understanding and enjoyment of the special qualities of the National Park in a manner that will not undermine the enjoyment of those qualities by other visitors or the quality of life of residents;
4. It is of a quality, scale and design that takes into account and reflects the sensitivity of the local landscape;
5. the holiday accommodation would be used for short term holiday stays;
6. It does not compromise the enjoyment of existing tourism and recreational facilities or Public Rights of Way; and
7. It does not lead to unacceptable harm in terms of noise and activity to the immediate neighbourhood.



**7.04.** The Scheme complies with **Policy UE1 - Location of Tourism and Recreation Development** as

- a) The proposal is for the expansion and diversification of an existing tourism business
- b) The proposed development is functionally dependent and subservient in scale to the existing business, and
- c) It has been demonstrated that by the very nature of the type of holiday accommodation proposed, the proposed development cannot be accommodated in an existing building

**7.05.** The Scheme complies with **Policy UE2 - Camping, Glamping, Caravans and Cabins** due to:

- 1). It would form part of and not be isolated from an existing business
- 2). The accommodation avoids extensive alteration to ground levels and has a low environmental impact through limited foundations to enable the accommodation to be removed without harm to the landscape
- 3). It does not lead to unacceptable harm in terms of noise and activity on the immediate area
- 4). Ladycross Plantation Holiday Park is existing and the proposal does not, in combination with existing development detract from the character, tranquillity or visual attractiveness of the area; and
- 5). The accommodation is of a high quality design which would blend fully into the setting and complements its surroundings.

**7.06.** Whilst it is acknowledged that this proposal does include a small element of Static Holiday Caravans, these are already consented and this proposal merely seeks a restructuring of that facility. The notes accompanying Policy UE2 advises that additional units of this nature would be acceptable where existing static sites are being remodelled in order to bring about environmental improvements.

**7.07.** The fundamental basis of this scheme is to restructure and upgrade the existing park, improve the tourism product and provide environmental improvements.

**7.08. Policy Summary.** The Development Plan specifically encourages the enhancement and improvement in the standards of accommodation and improvement to visual amenity, environmental impacts and landscaping.

**7.09.** This site is an existing Tourism and Leisure Enterprise and the scheme comprises of many unique exceptional and special circumstances :-

- 1). The proposal falls within the Operational Extent of Ladycross Plantation Holiday Park.
- 2). The Holiday Caravans and Woodland Lodges proposed would be located in an informal low density layout, and extensively landscaped in native species of trees and shrubs. The Lodges are manufactured from timber and both the Lodges and Holiday Caravans would be in muted environmental colours.

- 3). All areas of the proposals are in unobtrusive locations, and fully surrounded and screened by mature woodland.
- 4). There are significant sound economic and employment reasons that justify the scheme.
- 5). The proposals are high quality in terms of design, layout, appearance and the accommodation product
- 6). The proposal would significantly improve the quality of holiday accommodation in the region and at the Holiday Park.
- 7). The site is an existing tourism and leisure enterprise located close to the main highway network, access is existing and can be provided without any detrimental impact.
- 7.10. The Development Plan recognises the need that land of the right type and in the right locations needs to be made available via planning permissions to support economic growth, employment and the provision of facilities in areas where they are needed and of benefit.
- 7.11. Rural economies are reliant on two major industries, these being Agriculture and Tourism. The support of these industries is critical to ensure that diversification can take place, which leads to the safeguarding of existing tourism and leisure enterprises.
- 7.12. The Development Plan specifically supports the development and provision of modern desirable tourism accommodation and supports the provision of land to be made available in the right places and at the right time to support growth, innovation and improved productivity.
- 7.13. This proposal is for the restructuring of previously consented units into a premium 5\* development of Holiday Caravans and bespoke Woodland Lodges on an existing holiday park enterprise within a recognised Holiday Area. It is therefore considered that a low impact development is an appropriate use for this site.
- 7.14. Policy Conclusion**
- 7.15. For all the reasons set out above, this proposal is sustainable development, and would not have a detrimental impact upon the Visual Amenities of the area, Highways or Residential Amenity.
- 7.16. As such it should benefit from the presumption that planning permission should be granted as set out in the National Planning Policy Framework and within the Development Plan, where no material adverse impacts arise and, even if there were, they are not such as to clearly and demonstrably outweigh the very significant benefits that would arise.
- 7.17. There are no adverse impacts arising from this proposal that would carry sufficient weight to outweigh the benefits. This proposal therefore accords with the key objective of achieving sustainable development.
- 7.18. This proposal therefore accords with the three dimensions of sustainable development, and as shown above, the application, being the expansion of an existing rural business, not resulting in the loss of valuable agricultural land or the fragmentation of an agricultural holding, makes no adverse impact on levels of

existing biodiversity, and will make no adverse impact upon highway safety or levels of adjacent residential amenity.

### 8.01. Economic and Employment Benefits

8.02. A groundbreaking report published in February 2019 reveals that Holiday Parks generate £9.3billion in Visitor Spending

8.03. These are Headline statistics for the first-ever UK-wide holiday park and campsite sector economic report, 'Pitching the Value' which identified that:

- Holiday parks and campsites generate £9.3bn in visitor expenditure equating to £5.3bn Gross Value Added (GVA) to the UK economy
- The sector's GVA accounts for 8% of the tourism sector's overall GVA of £64.7bn
- The holiday park and campsite sector supports 171,448 FTE jobs in the UK
- Visitors who stayed in rented or touring accommodation, such as Caravans / Lodges / Chalets, spent on average £557 per visit (£101 per day)
- Visitors to holiday parks and campsites stay longer and spend more than the average tourist

8.04. The British Holiday & Home Parks Association (BH&HPA) have also published information on the financial contributions that the "Parks Industry" and Tourism Industry made to the economy. The article "The Contribution of the Holiday Parks Industry" advised :-

*"Those drafting local authorities planning policies, and councillors and planning officials charged with making planning decisions, should be left in no doubt about the value of holiday and touring parks. This is absolutely vital to offset some of the prejudice that all too often stands in the way of parks legitimate plans. Too often members find the planning system presents a formidable obstacle to any proposals for new or expanded holiday, touring and camping parks that could help sustain rural economies."*

8.05. One key relevant fact was that - Every two caravan holiday home (or Lodge) pitches account for one tourism job *(source BH&HPA Journal)*

8.06. The BH&HPA published the following figures that the UK Holiday Parks Industry Accounted for :-

#### UK economic impact

The total turnover and visitor expenditure of the UK holiday and touring parks industry is approximately £4 billion per annum. The total economic impact to the UK has been calculated as a Gross Value Added (GVA) contribution of £1.4 billion per annum, supporting a total of 53,000 direct and indirect jobs in the UK. Generated by 19.5 million visitors and 168 million visitor days.

#### Visitor numbers

The UK holiday and touring park industry attracts approximately 19.5 million visitors per annum, who spend a total of 168 million visitor days on parks. Of these 19.5 million

visitors, 11.7 million stay in privately-owned caravan holiday homes, 4 million stay in letting units and 3.8 million stay in tourers. Of the 168 million visitor days, 100.5 million are spent staying in privately-owned caravan holiday homes, 35 million in letting units and 32.5 million in touring caravans and tents.

### **Direct staff numbers**

The UK holiday park industry supports 26,500 Full Time Equivalent (FTE) direct jobs at an average wage per FTE job of £18,500.

### **8.07. Catalytic impacts**

**8.08.** The holiday park sector is a very important part of the UK visitor economy due to its size and its apparent resilience in the recent economic downturn. The sector impacts on other parts of economies local to individual parks – for example many local shops, garages, visitor attractions etc. survive only because of trade from visitors staying at holiday parks.

**8.09.** Parks typically contribute about 20% of the income to rural economies in popular tourism areas, and sustain around 15% of full-time and seasonal jobs which the tourist board estimates are tourism-dependent.

**8.10.** Tourism is highly seasonal, it is widely acknowledged by tourist boards that "Britain must seek to attract less seasonal and higher yielding tourism business in the six month shoulder period October - March when the industry operates well below capacity. Tourism must be supported through the growth of sustainable means i.e. the extending of the season and improving the business yield... also spreading the volume and value of tourism throughout the year... almost 60% of all holiday expenditure occurs in the three months of June, July, and August. This seasonal pattern has contributed to low profitability, higher than average seasonal variations on employment and has led to environmental pressures".

### **9.01. Summary and Conclusion**

**9.02.** The above Policies and Guidance are all particularly relevant to this proposal and demonstrate that the proposal is an acceptable form of development that has taken account of, and meets the criteria of the above policies in that :-

**1).** The proposals respects the site and its surroundings in that the sites are already fully screened and capable of being suitably screened, that it is sited within and adjacent to an existing tourism and leisure development.

**2).** The size and scale of the proposed units are low single storey units and subordinate in size and scale to the existing buildings and dwellings in the area.

**3).** The form, character, design, nature of materials, and muted environmental colours of the proposed units will blend seamlessly into the natural environment.

**4).** The proposal would not unacceptably affect any prominent public views into, out of, or across any settlement or area of open countryside.

**5).** The proposal takes full account of its location, contours and any minor changes in levels. The site is not prominent and not visible on any skylines.

- 6). The development would not affect the amenity of local residents, other land and property users or characteristics of the locality.
- 7). It provides safe and convenient access for vehicular traffic, pedestrians, cyclists, and emergency vehicles together with adequate parking, services and manoeuvring space. There are no impacts on the wider Rights of Way network surrounding the site.
- 8). The proposal is unlikely to have any material effect or unacceptable effect on the highway network.
- 9). This proposal does not prejudice land or buildings safeguarded for other uses, or impair the development and use of adjoining land – agricultural or otherwise.
- 10). The proposal satisfies physical or natural environmental considerations in that all services required including Mains Water, Electricity, Telephone and Foul Sewer Disposal are either existing services and available on site or can be provided. Internet / Wifi access will be provided to all the holiday units. Any Refuse generated will be of a Household nature and full recycling facilities will be provided.
- 11). The proposal is to continue to create an exclusive 5\* Tourism and Leisure business.
- 12). The proposal is sustainable and accessible to all means of Transport including access by walking and cycling, and it will support and extend the range of facilities on offer within the County.
- 9.03. From the above it has therefore been demonstrated that the proposal is in accordance with the relevant Policies within the Local Development Plans and National Policies and Guidance.
- 9.04. There are no adverse impacts arising from this proposal that would carry sufficient weight to outweigh the benefits. This proposal therefore accords with the key objective Policies and Guidance of achieving sustainable development.
- 9.05. We therefore consider that the development should be supported as it meets Policy and due to the Unique Special Reasons & significant material benefits proposed not only to the holiday product but also to the rural local economy and employment.

The scheme does deserve to be considered for Approval, and we would be grateful for the National Parks considered support for this scheme.

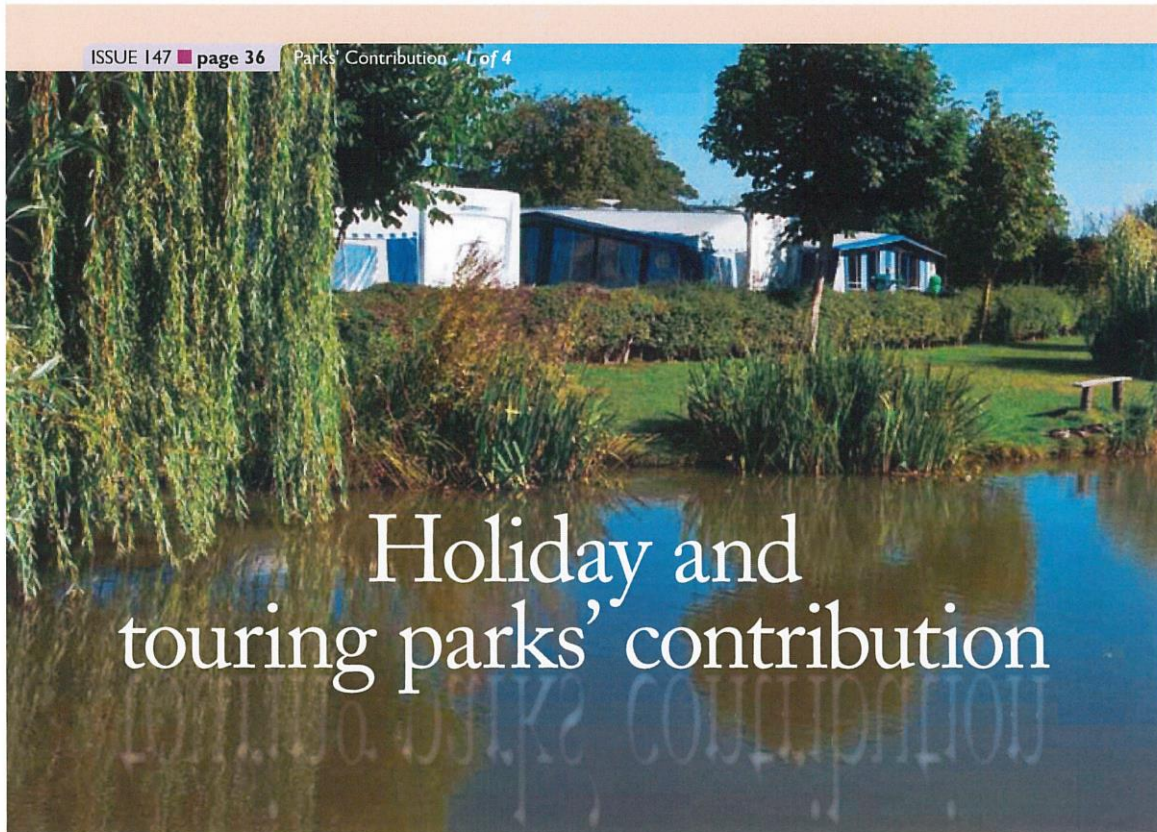
Jonathan Moore Lambe 21<sup>st</sup> July 2022 ©copyright

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**PTO Appendix**

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## Appendix 1. Industry Statistics demonstrating the level of spends & employment generation of benefit to the local rural economy – article extract BH&HPA Journal



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# Holiday and touring parks' contribution

**Councillors and officials drafting local authority policies and making planning decisions, and all politicians who decide the regulation of park business, should be left in no doubt as to the contribution of holiday and touring parks.**

The Coalition Government's policies of 'localism' and 'Big Society' are devolving power to the local level. Local authorities are to be given a 'general power of competence', a wide mandate to do what they consider 'the right thing' for their local area. Going forwards, there will be far fewer targets and requirements from central government, local authorities are to be freed up to govern their local area as they see fit.

Such wide discretion may be a double-edged sword for park business, depending on the attitudes of the local authority and the local electorate. Recognition of the value of local parks could bring benefits, whilst ignorance or prejudice could achieve the opposite. It is essential BH&HPA members communicate their business contribution at every opportunity.

If the community does not recognise what they receive from their local park business, they can hardly be expected to support it. It is therefore essential that this contribution is communicated at every opportunity.

A park's contribution will be economic, social and environmental. **It will include:**

- the number of jobs that are sustained, both directly in the park business and indirectly in the locality
- the market created for local goods and services thereby supporting local businesses (shops, pubs, attractions. ... even bus services) which remain viable through the patronage of park customers
- trade (and employment) for local businesses that work on the park (tradesmen, suppliers, plumbers and electricians: all who trade with the park)

- on-park facilities, such as a shop or swimming pool, which are available for local users and whose absence would be sorely missed

- conservation and biodiversity work on the park and in its surroundings

- involvement in local causes and educational projects

- maintenance of environmental assets, such as footpaths and beaches.

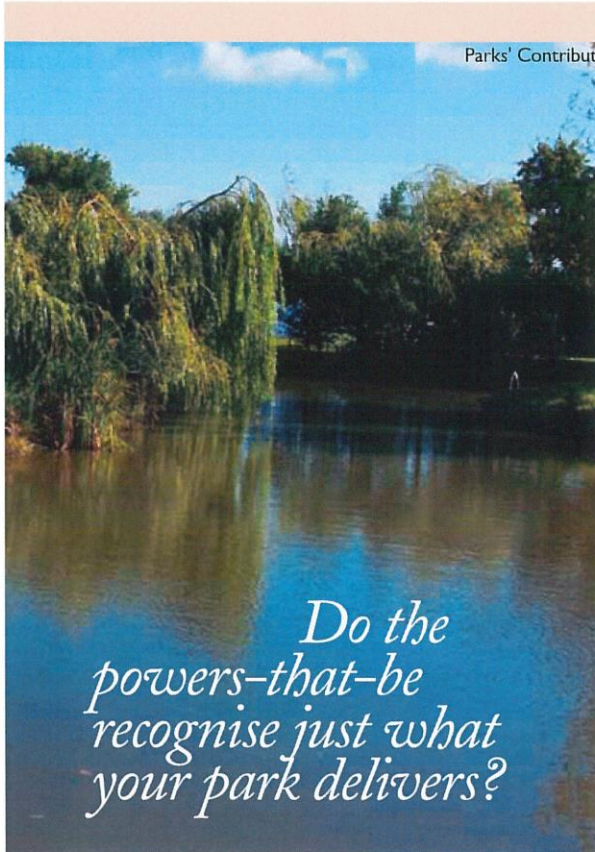
### Making (and repeating) the case

It is important that park owners themselves recognise the changing political arena and create opportunities to engage with policymakers at the local level.

If business fails to engage at the local level, the vacuum that they leave will be filled by those with more time and perhaps some particular axe to grind. Single issue lobby groups can wield disproportionate influence if their fervour for an issue is not tempered with good common - and business - sense.

Local authorities' economic development departments will appreciate data to support their plans for the area, while local Destination Management Organisations and Local Economic Partnerships may need evidence of the integral role played by parks in defining tourism destinations and sustaining the local economy.

The case put for the industry by BH&HPA members will be more compelling if backed up by data from credible sources. The following pages provide some facts and figures regarding the holiday and touring parks industry which BH&HPA members can use to demonstrate the contribution of their parks, and tourism in general, to the sustainability of communities.



*Do the powers-that-be recognise just what your park delivers?*

### Tourist spend<sup>ii</sup>

Park accommodation	2009 Tourist spend	% of UK total
Caravan holiday homes - let	£875,240,000	4%
Caravan holiday homes - privately-owned	£437,620,000	2%
Touring caravans	£656,430,000	3%
Camping	£656,430,000	3%
Holiday camp	£437,620,000	2%
<b>Total parks industry</b>	<b>£3,063,340,000</b>	<b>14%</b>

### Economic contribution

Several studies have been undertaken.

#### Caravan holiday homes

A study in Wales indicates that each caravan holiday home generates spending of between £6,721 and £19,138 each year into the local economy<sup>iii</sup>.

2010 research<sup>iv</sup> amongst caravan holiday home consumers who participate in the BH&HPA Rate This Park consumer panel indicates that the average spend per night for an occupied caravan holiday home pitch is between £78.62 and £122.42. (The study asked consumers about their spend on items such as accommodation, travel, car parking, groceries, eating and drinking out, activities, attractions, capital items and other shopping.)

The annual economic contribution can be calculated if pitch occupancy is considered:

Annual economic contribution per caravan holiday home pitch

Annual pitch occupancy	From £	To £
20 weeks	£11,007	£17,138
25 weeks	£13,759	£21,424
30 weeks	£16,510	£25,708

#### Touring caravans

The Camping and Caravanning Club places the average daily spend in the local community per touring pitch, excluding site fees, as £31.91<sup>v</sup>.

2010 research<sup>vi</sup> amongst touring consumers who participate in the BH&HPA Rate This Park consumer panel indicates that the average spend per night for an occupied touring pitch is £72.17. (The study asked holidaymakers about their spend on items such as accommodation, travel, car parking, groceries, eating and drinking out, activities, attractions, capital items and other shopping.)

The annual economic contribution can be calculated if pitch occupancy is considered.

Annual economic contribution per touring pitch

Pitch occupancy	£
20 weeks	£10,104
25 weeks	£12,630
30 weeks	£15,156

continued...

### Holiday and touring parks' contribution

#### Tourist statistics

Over 50% of the British population take a park holiday in their lifetime<sup>i</sup>.

Tourism data are gathered by the United Kingdom Tourism Survey (UKTS) which recorded that in 2009, the parks industry accounted for:

#### Tourist nights<sup>ii</sup>

Park accommodation	Tourist bed nights	% of UK total
Caravan holiday homes - let	19,935,000	5%
Caravan holiday homes - privately-owned	15,948,000	4%
Touring caravans	23,922,000	6%
Camping	19,935,000	5%
Holiday camp	7,974,000	2%
<b>Total parks industry</b>	<b>87,714,000</b>	<b>22%</b>



### Direct employment

Considering employment across the industry, a 2010 report prepared by Oxford Economics for the British Hospitality Association, 'Economic contribution of UK hospitality industry'<sup>viii</sup>, provided an assessment of the economic contribution of the core UK hospitality industry to the country's wider economy.

Two statistical classifications are particularly relevant to the parks industry:

**SIC 2007 – 5530 - Camping grounds, recreational vehicle parks and trailer parks** – defined as: 'Provision of accommodation in campgrounds, trailer parks, recreational camps and fishing and hunting camps for short-stay visitors, provision of space and facilities for recreational vehicles and accommodation provided by protective shelters or plain bivouac facilities for placing tents and/or sleeping bags'.

**SIC 2007 – 5520 - Holiday and other short-stay accommodation** – defined as: 'This includes the provision of accommodation, typically on a daily or weekly basis, principally for short stays by visitors, in self-contained space consisting of complete furnished rooms or areas for living/dining and sleeping, with cooking facilities or fully equipped kitchens. This may take the form of apartments or flats in small free-standing multi-storey buildings or clusters of buildings, or single storey bungalows, chalets, cottages and cabins. Very minimal complementary services, if any, are provided.'

'Economic contribution of UK hospitality industry' reported direct UK employment in these classifications as follows:

	Direct employment 1998	Direct employment 2010	change 1998 to 2010 %
Camping grounds, recreational vehicle parks and trailer parks	19,000	29,000	+53%
Holiday and other short-stay accommodation	45,000	50,000	+11%

Of particular note is the 53% rise in direct employment on holiday parks over the 12 years to 2010.

Research carried out in Wales<sup>viii</sup> has resonance across the UK. Key findings of this research included that average number of staff employed on parks was 20 in low season, with this figure more than doubling in high season.

### Indirect employment

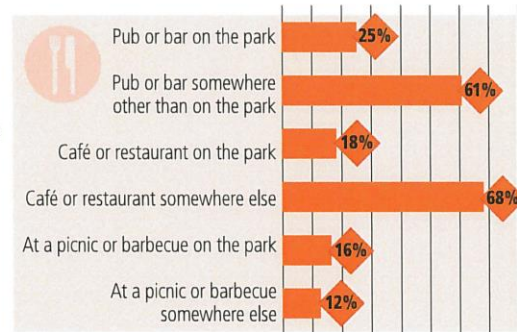
A 2001 study reported that every two caravan holiday home pitches account for one tourism job<sup>ix</sup>.

The Camping and Caravanning Club research<sup>x</sup> confirmed the wide range of activities pursued by visitors surveyed. These included:

- visiting the local pub (58%)
- eating in local restaurants (52%)
- visiting other tourist attractions (68%).

#### Park customers eating out

Park consumers who participated in the BH&HPA consumer panel in 2010<sup>xi</sup> were asked if they ate out during their park holiday; the majority (68%) had purchased meals from restaurants in the area local to the park.

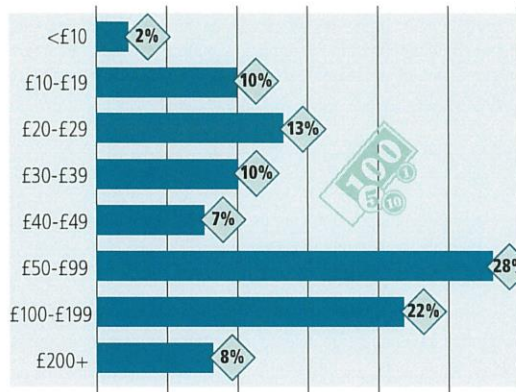




### Caravans: a UK manufacturing industry

Nearly two-thirds of park holidaymakers who participated in the BH&HPA consumer panel said that they spent money buying clothes, gifts or other shopping during their holiday. Items such as clothes or gifts accounted on average for nearly £45 of each park holiday group's expenditure.

#### Spend by park customers on non-food shopping



It is not only direct and indirect tourist spend that sustains local economies; caravan holiday home and touring caravan manufacturing businesses, their suppliers and service providers are also important job and wealth creators.

With so few manufacturing industries having survived the economic tribulations of the last 50 years, it is important to emphasise that the parks industry sustains this important manufacturing sector. The overwhelming majority of lodges, caravan holiday homes, touring caravans and motorhomes sold on the domestic market are of UK manufacture.

The National Caravan Council publishes industry production figures from manufacturers' data, confirming production totals for the last three years as follows<sup>xii</sup>:

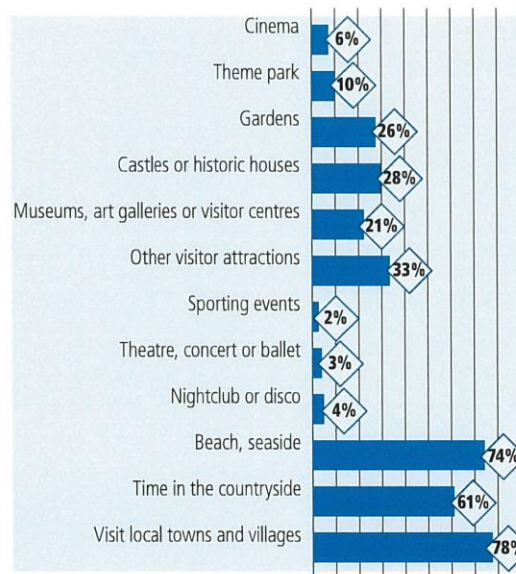
#### UK touring caravan sales

2007-2008	29,266
2008-2009	20,135
2009-2010	25,114

#### UK caravan holiday home sales

2007-2008	20,153
2008-2009	12,931
2009-2010	17,308

The same study highlighted park customers' support of local attractions.



In addition to park customers' support of local attractions, hospitality and retail businesses, parks employ numerous tradesmen and local businesses to support their work, from plumbers and electricians to construction and horticultural companies, waste contractors to accountants and IT providers.

#### Sources

- i 59.5% of the UK population stated that they had 'ever spent' a camping/caravanning holiday. 'Camping & Caravanning' research conducted for the European Commission by GfK Marktforschung GmbH & Co.KG (1989)
- ii United Kingdom Tourist Statistics 2009. [www.tourismtrade.org.uk](http://www.tourismtrade.org.uk)
- iii RPI from October 2003 to October 2009 applied to figures derived from 'Caravan Holiday Homes in Wales', The Tourism Company 2003, Wales Tourist Board and BH&HPA
- iv December 2010, BH&HPA research amongst the Rate This Park consumer panel
- v RPI from October 2007 to October 2009 applied to figures derived from 'Spend in the Local Community Summary Report', Camping and Caravanning Club - Easter and Summer Results 2007
- vi December 2010, BH&HPA research amongst the Rate This Park consumer panel
- vii 'Economic contribution of UK hospitality industry', Oxford Economics, September 2010. [www.bba.org.uk/wp-content/uploads/2010/10/BHA-Economic-Contribution-of-UK-Hospitality-Industry-Final-.pdf](http://www.bba.org.uk/wp-content/uploads/2010/10/BHA-Economic-Contribution-of-UK-Hospitality-Industry-Final-.pdf)
- viii 'Caravan Holiday Homes in Wales', The Tourism Company 2003, Wales Tourist Board and BH&HPA
- ix 'Holiday Parks - Your value to the local community', Ian Butter, BH&HPA Journal, March-April 2001
- x 'Spend in the Local Community - Summary Report', Camping and Caravanning Club - Easter and Summer Results 2007
- xi 'Economic Contribution', December 2010, BH&HPA Research Report for the Rate This Park consumer panel
- xii 'The Business', National Caravan Council, Winter 2010