

# Planning Statement for Siting of Ten Holiday Lodges

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# 1. Introduction

- 1.1. The Applicant, Cotswold Hills Country Park Limited, has commissioned Laister Planning Limited (LPL) to produce this Planning Statement to accompany the planning application for the use of land for the siting of 10 additional holiday lodges (static caravans) and associated infrastructure, to replace touring caravans that are capable of being stationed on a permanent basis.
- 1.2. The proposal will enable the holiday park to provide accommodation that more closely meets their customers' expectations, as well as the significantly increased demand post-Covid, for staying in self-catering holiday accommodation. It will also help fund other environmental upgrades and improvements within the wider site.
- 1.3. It is the Applicant's view that the use of the application site for holiday lodges would be acceptable in planning and landscape terms, given that this would be sited immediately adjacent to and extend, internally towards the central facilities, an area that is currently being developed for 6 similar lodge units. It will also utilise land within which touring caravans can already be sited, to a comparatively higher density, thereby resulting in a reduction in the total number of caravan units.
- 1.4. In addition to this planning statement, the planning application is accompanied by the following documents:
  - Completed planning application form;
  - Completed copy of Council's Validation Criteria form;
  - Site Location Plan;
  - Landscape Masterplan.
- 1.5. We cross-refer to these drawings where applicable as part of our overall planning case set on in this Planning Statement.
- 1.6. Section 2 briefly describes the characteristics of the application site and surrounding area, as well as relevant planning history. Section 3 describes the application proposal, definition of caravans under the 1960 Caravans Act, and economic justification for the new (replacement) static caravans envisaged. Section 4 briefly assesses our proposal for statics against relevant planning policies. Section 5 contains our main assessment of the proposal judged against planning policies and other material considerations. Our main conclusions are contained in Section 6.

## 2. Site Context & Planning History

### Site and Surroundings

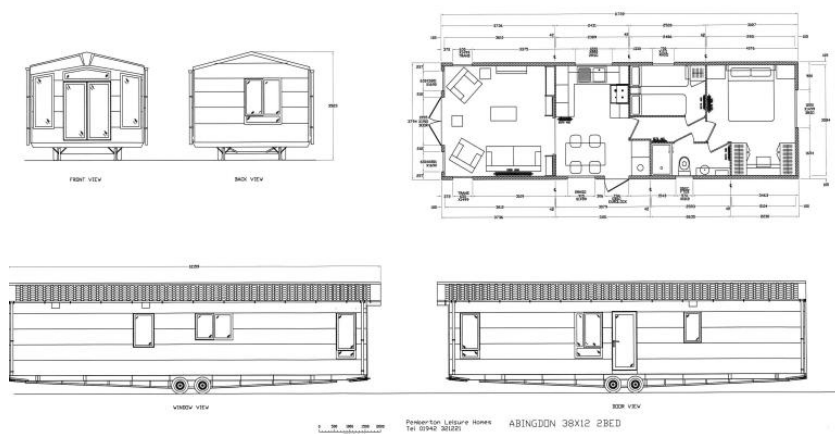
- 2.1. Cotswold Hills Country Park constitutes an established touring caravan and holiday lodge park, including an existing on-site caravan storage facility, that is situated approximately one mile to the north-east of Chipping Norton. It accommodates up to approximately 63 touring caravans/motorhomes, as well as 6 holiday lodges. Vehicular access is obtained off Hook Norton Road (close to its junction with the A361), that runs parallel with the park's south-eastern boundary. The Park is open 12 months a year.
- 2.2. The application site comprises a square-shaped parcel of land, comprising part of a larger rectangular field that is primarily used and laid out to accommodate touring caravans and motorhomes.
- 2.3. The application site itself is able to station up to 15 touring units at present. If the Applicant is unable to secure planning permission for the 10 lodges currently proposed, to cater for a substantially increased demand for holiday lets, he is considering stationing touring caravans permanently here (as opposed to bringing touring caravans on site for a short period). This would either involve customers stationing their touring caravans permanently on the land and using as holiday homes, or the park itself stationing touring caravans for customers to let for short holidays. This substantially changes the baseline as a material planning consideration.
- 2.4. The north-western end of the rectangular field, immediately abutting and accessed via our current application site, has recently been developed for 6 holiday lodges (also static caravans), in accordance with a planning permission granted in December 2018, that we refer to below.
- 2.5. The rectangular field as a whole is bounded by mature tree and hedge planting along its north-eastern, south-western and north-western boundaries; its south-eastern end connects into other serving/parking/facilities areas within the wider park.
- 2.6. Further afield, a small number of residential properties are situated towards the south and east of the caravan park; a commercial/industrial unit is situated opposite the site's main entrance. Land towards the north and west is generally rural (agricultural) in character.

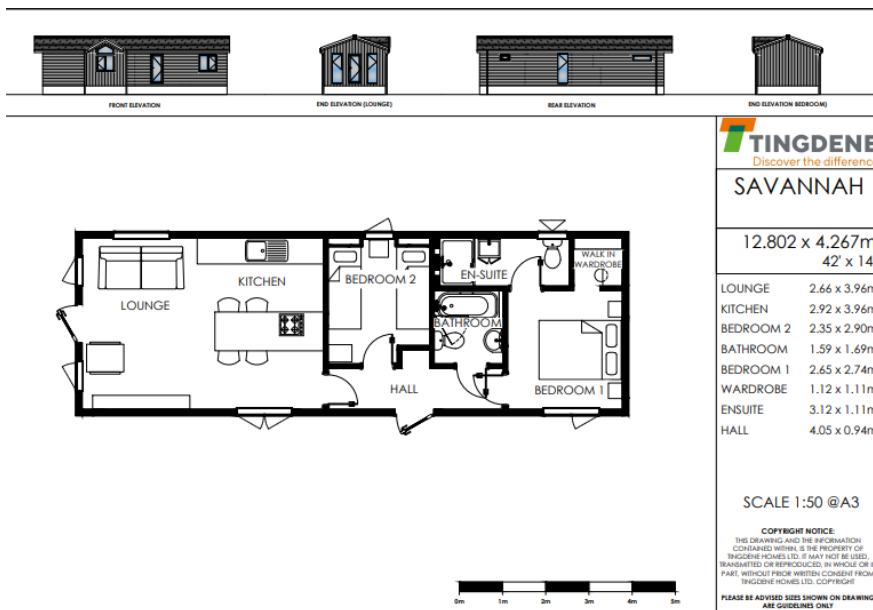
### Planning History

- 2.7. There is extensive planning history relating to the caravan park as a whole.
- 2.8. In particular, planning permission was granted in December 2009 (LPA Ref. 09/1268/P/FP) for 'change of use of part of site to touring caravan park and farm workshop to workshop for the service and repair of caravans and motor homes,

erection of building to form garages, office and shop/information centre'. The touring caravan park element applies to the south-eastern portion of the main rectangular field, towards the south-east of the current application site area. Planning Condition 6 stated that a maximum of 30 touring caravans should be occupied on the site at any one time; Condition 9 stated that no individual touring caravan should be pitched on site for a period in excess of 8 weeks.

- 2.9. Planning permission was granted in April 2011 (Ref. 11/0432/P/FP) for 'change of use of land to provide 35 additional touring caravan pitches'. This applied to the remaining north-western portion of the rectangular field, including the application site the subject of this current planning application. Condition 3 stated that the number of caravans on site should not exceed 35 at any one time. Condition 4 stated **"That the occupancy of any caravan shall be limited to a maximum of eight weeks (in each case) and no person shall occupy the caravan in consecutive tenancy periods"**. This latter condition restricts the nature of occupation of individual caravans; it does not actually prevent them being permanently stationed in this location throughout the year.
- 2.10. More recently, in December 2018, permission was granted for 'siting of six holiday lodges' (Ref. 18/03199/FUL). This applies to the parcel of land adjoining the north-western side of the current application site, that has recently been developed pursuant to this permission. This granted consent, under Condition 2, for a range of lodge units (technically static caravans, both single and twin-units), as varied through a formal non-material amendment approved on the 21 December 2021 (Ref. 21/03998/NMA) to include additional specifications for the type of holiday lodge to be stationed; examples of some these lodge/static types are inserted below for information.





2.11. According to the Delegated Report associated with the determination process, in relation to design, scale and siting, Planning Officers stated:

***“The lodges would be sited within the existing caravan park which comprises residential and commercial hub. Whilst the proposed lodges would be larger than conventional caravans, the proposed lodges would not necessarily appear to be more prominent by virtue of its increased length and would not appear incongruous within its setting and would not detract from the landscape character and setting and scenic beauty of the Cotswolds AONB.”***

2.12. Planning Condition 3 of Ref. 18/03199/FUL required a schedule of materials associated with the construction of the lodge units to be agreed with the LPA

before they were brought to site. Condition 4 stated that a landscaping scheme should be submitted and approved by the LPA prior to commencement. These conditions were later formally discharged in February 2019 (Ref. 19/00147/CND).

- 2.13. Condition 5 of Ref. 18/03199/FUL sought to preclude continuous residential occupation, and stated:

***“The occupation of the accommodation hereby permitted shall be limited to holiday purposes only. None of the holiday lodges are to be used at any time as permanent accommodation or as a primary place of residence. The owner shall provide upon request by the District Council a list of all persons who in the twelve (12) month period leading up to the date of such a request have occupied one or all of the apartments (such list is not to be unreasonably withheld or delayed).”***

- 2.14. Our proposal for an additional 10 holiday lodges/statics will comprise similar or identical accommodation units to the 6 lodge units originally granted permission in 2018, and will serve to extend that scheme internally into the wider established caravan park (utilising land already used for touring caravans), fitting into and complementing the wider landscape setting, including the scheme approved under Condition 4 of the 2018 permission.



## 3. Nature of Proposal

### The Proposed Development & Definition of Caravans

- 3.1. Planning permission is sought for the use of land for the siting of 10 additional holiday lodges (static caravans) and associated infrastructure, to replace touring caravans. The fact that touring caravans may currently be physically sited within the application site on a permanent basis, with a planning condition only restricting the period of individual occupation (to prevent permanent residential use), as the (future) baseline position, is an important material consideration for planning assessment purposes.
- 3.2. The proposed scheme has been conceived as a sustainable extension to the existing holiday lodges within the park, that will help bring environmental improvements to the park as a whole. It will meet the increasing expectations of visitors for good quality accommodation in beautifully kept grounds sympathetic to the natural environment. It will help also provide a more successful tourism business that will be financially sustainable, to the benefit of the business, visitors and the local economy.
- 3.3. Whilst the accommodation units will have the external character and appearance of timber lodges, as with the 6 lodges recently granted planning permission, the units will technically be static caravans for the purposes of the Caravan and Control of Development Act, 1960, and will need to be licensed by the Council prior to occupation. The units themselves comprise a use of land only in planning terms.
- 3.4. In this context, 'caravans' are defined in the 1960 Caravans Act, as amended. The original definition of a caravan in the 1960 Act includes **"any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer) and any motor vehicle so designed or adapted, but does not include any railway rolling-stock or any tent"**. This definition was amended by the Caravan Sites Act 1968 to cover twin-unit mobile homes, and this states that twin-units are composed of not more than two sections, constructed or designed to be assembled on site by means of bolts, clamps or other devices, and should not exceed 60 feet (18.3m) in length, 20 feet (6.1m) in width and 10 feet (3m) in height overall. The Mobile Homes Act (2013) confirms that the new dimensions are: length 20m, width 6.8m and overall height (measured internally from the floor at the lowest level to the ceiling at the highest level) 3.05m. For planning purposes both the Town and Country Planning Act 1990, and The Town and Country Planning (General Permitted Development) Order 2015 both adopt this definition.
- 3.5. Under normal circumstances the internal arrangements of the site - the roads, paths, hardstandings and other necessary infrastructure - are covered by the site

licence (that the Council is required to issue once planning permission is granted for the use) and would be permitted development under Class B, Part 5, of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 applicable to caravan sites. In this instance, for the avoidance of any doubt, we have specifically included these elements as 'infrastructure' as part of the proposed description of development for the planning application, where the layout and density is also compatible with 'model standards' prescribed under the licencing process. It should be noted, however, that the internal access road itself has already been granted planning permission as part of part of the earlier planning permissions associated with the wider development of the rectangular field.

- 3.6. There would be no landscape harm to replace touring caravans (which are capable of being sited permanently, without any restriction on siting under planning) with caravans/lodges, situated adjacent to the previously permitted 6 lodges, as the site would continue to have the appearance of a caravan site. Whilst the footprint of the lodges would be larger than the touring units, combined with the other landscape enhancements and provision for open amenity space, this would have the effect of reducing the number of caravans that could be accommodated within the application site. The net effect remains a caravan site with caravans stationed all year round.
- 3.7. The design and appearance of the individual lodge units will be similar or identical to the 6 adjacent lodges, and the layout and landscaping scheme (as shown on the accompanying Landscape Masterplan) would also complement that approved as part of the permission for those lodges. If deemed necessary, as with the 2018 planning permission, a suitably worded planning condition, or conditions, could be imposed to control the detail of the landscaping as well as the character and appearance of the lodges.

## **Need for the Development & Benefits**

- 3.8. The ongoing Covid-19 pandemic has forced the owners to evaluate the current business and consider how to strengthen their financial base and better meet the changing requirements of their customers.
- 3.9. In general, demand from visitors is for a much higher standard of self-catering accommodation, as opposed to a pitch for a touring caravan. It is essential for the site to offer an extended range of high quality, modern, self-catering static caravan units to meet customer and remain competitive. This would also help to boost occupation during the out-of-season months, having regards to the nature and design specification of such units, which have better insulation qualities than touring caravans.
- 3.10. Covid-19 has had seen a significant shift in demand for holidays. Because most people in the UK are choosing a 'staycation' instead of holidaying abroad, the demand is for good quality self-catering accommodation, of the type that can be provided in a modern static caravan. These people in general do not have touring

caravans, so the park needs to provide the accommodation. This situation is expected to last for several years, as the barriers to foreign holidays (largely based around uncertainty, risk of losing money, cost and availability of hotels and flights) are not going to be all removed in the short term. Expectations are that the process could take 5 years.

- 3.11. Statistics for 2022 pre-bookings remain positive, showing the trend towards staycations has not subsided. Independent Cottages said interest was up 25% year-on-year. Research from financial services website Square says 45% of Brits are planning a staycation this summer.
- 3.12. New data released by Hoseasons, one of the biggest sellers of self-catering caravan holidays, in September 2021 showed that 830 out of 1,001 people polled (83%) who holidayed in the UK in 2021 said they would book a domestic break again this year. Bookings are up by 82% compared to 2019 for this summer and up 62% for the whole of 2022. Supply of self-catering accommodation is not meeting demand, which is why 2022 holidays have been booked far in advance.
- 3.13. It is understood that, on average, tourer demand is shrinking by between 3 to 5% a year, and so is unsustainable in the longer term. This reduced demand is also reflected through trends in the supply chain where, based on market intelligence obtained from the Applicant via the British Holiday & Home Parks Association (BH&HPA), manufacturers are planning to reduce touring caravan and motor home production by 10% for the year 2021 and 2022.
- 3.14. It is therefore essential that the Applicant provides for this changing demand and tries to offer a product that will keep visitors returning in the long-term.
- 3.15. This application is to allow the holiday accommodation offer at Cotswold Hills Country Park to be balanced towards the current, and likely future, need for self-catering accommodation.
- 3.16. With the siting of additional holiday lodges, the park will become much more focussed on current customer requirements and trends, and it will enable the owner to continue to operate and invest in other environmental upgrades and improvements within the wider site.
- 3.17. The business currently employs four full-time staff. As well as safeguarding these jobs, and ensuring that a greater proportion of them can be year-round, it is estimated that the development will generate an additional four full-time jobs both during the construction and operational phases of development. It will also help to boost tourism spend within the wider local economy, especially during the out-of-season months.

## 4. Planning Policy Review

- 4.1. Any proposed development must be judged against the relevant Development Plan and other government planning policy and guidance. Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 together require that planning applications should be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise. For the purposes of this Planning Statement, the Development Plan comprises the West Oxfordshire Local Plan (September 2018). We briefly review relevant policies in this section below, before returning to these where applicable as part of our main assessment contained in Section 5.

### Development Plan

#### West Oxfordshire Local Plan (September 2018)

- 4.2. A Core Objective of the Local Plan is: **“to enable a prosperous and sustainable tourism economy”** (Policy CO8). The proposed development is consistent with this aim, in catering for an increased demand for the type of self-catering accommodation proposed, associated with the operation on an existing caravan site business, that will increase occupation during the out-of-season holiday seasons and generate additional spend within the wider local economy.
- 4.3. Policy OS2, ‘Locating development in the right places’, states that development in the open countryside will be limited to that which requires and is appropriate for a rural location and which respects the intrinsic character of the area. Proposals for non-residential development that is regarded as appropriate will include, for example, **“proposals to support the effectiveness of existing businesses and sustainable tourism”**. The proposed development complies wholly with this part of the policy. There is an established need for the additional holiday lodges/caravans in this location linked to the operation of the caravan site, as explained in the previous section of this planning statement. The application site itself already forms part of the established caravan park, within which touring caravans may be physically sited on a permanent basis.
- 4.4. Policy OS2 also includes a number of ‘general principles’; in particular, all development should:
- Be of a proportionate and appropriate scale to its context having regard to the potential cumulative impact of development in the locality;
  - Form a logical complement to the existing scale and pattern of development and/or the character of the area;
  - Be compatible with adjoining uses and not have a harmful impact on the amenity of existing occupants;

- Be provided with safe vehicular access and safe and convenient pedestrian access to supporting services and facilities;
  - Not be at risk of flooding or likely to increase the risk of flooding elsewhere;
  - Be supported by all necessary infrastructure.
- 4.5. In relation to the first and second points, the scale of the development is proportionate in relation to the wider caravan park site, since it will be sited on land in place of touring caravans, and form a modest, inwards, extension to an area that has recently been developed for 6 holiday lodges (which the current proposal will complement in terms of layout, character and type of individual caravan/lodge unit). Similarly, regarding the third point, it will be compatible with the caravan park function of the main site, and not harm the amenity of any existing occupants.
- 4.6. Dealing with the fourth point listed above, safe vehicular access will be afforded via the existing caravan site. If anything, highway safety will be improved as a result of the existing 15 touring pitches being replaced by 10 holiday lodges, whereby fewer touring caravans would be towed into the park, and there would be a net reduction in the overall level of traffic generated on the highway, particularly during the peak holiday season.
- 4.7. The site is not at risk from flooding, and the proposal will not increase the risk of flooding elsewhere bearing in mind that the internal roads already benefit from planning permission and 15 touring caravan may be stationed in a permanent basis (fifth point). On the final point, it will be supported by the infrastructure that is already in place for the existing caravan site.
- 4.8. Policy OS4, 'High quality design', states that new development should respect the historic, architectural and landscape character of the locality, contribute to local distinctiveness and, where possible, enhance the character and quality of the surroundings. As stated previously, the proposed caravans will have the character and appearance of lodges which, together with the landscape scheme incorporated, will complement the layout of the adjacent 6 holiday lodges that were granted planning permission in December 2018. The layout will also comply with model standards prescribed through the separate caravan licensing process.
- 4.9. Policy E4, 'Sustainable tourism', states that in the open countryside, new tourism and visitor facilities may be justified in particular circumstances, including where there is a functional linkage with a particular countryside attraction; or, the nature of the tourist and visitor facility is such that it could not reasonably be located within or close to Service Centres and Villages. In this instance, the additional holiday lodges are linked to the function of the main caravan site business, situated in this rural location.
- 4.10. Policy T2, 'Highway Improvement Schemes', states that all development will be required to demonstrate safe access and an acceptable degree of impact on the local highway network. As stated in relation to Policy OS2 above, arguably the

development will have benefit in highway safety and traffic terms having regards to the baseline use of the application site.

- 4.11. The Local Plan confirms that the site is situated on the inside edge of the Cotswold Area of Outstanding Natural Beauty (AONB). Here, Policy EH1 states that great weight will be given to conserving and enhancing the area's natural beauty, landscape and countryside, including its wildlife and heritage. This will include consideration of any harm to the contribution that the settlement makes to the scenic beauty of the AONB.
- 4.12. The proposed development, in relating to a relatively small parcel of a field within the existing caravan site where touring caravans may be permanently stationed, with dense tree and hedge planting situated along the outer boundaries of the wider rectangular field (as supplemented through the additional planting proposed), will both conserve and enhance the landscape characteristics of the AONB in this location, judged against this part of the policy. In the immediate term, it will be barely visible itself from any public vantage points outside of the site (we note there that there are no other public rights-of-way located within immediate proximity to the site). From the limited number of distant viewpoints where it might be possible to obtain glimpses of the caravans, they would be seen in the context of other caravans situated within the wider caravan site, including the adjacent 6 holiday lodges.
- 4.13. The proposed mitigation hedge planting along the boundaries, particularly the north-eastern boundary (as shown on the Landscape Masterplan), will, over the short-to-medium term once it has matured, serve to screen any residual views of the development from further away. As stated earlier, if deemed necessary, a planning condition can be imposed to control the detail of the landscaping, including both the height and retention of these additional hedges.
- 4.14. Policy EH1 also states that the Cotswolds Conservation Board's Management Plan and guidance documents are material considerations in decision making relevant to the AONB. We refer briefly to this management plan as a material policy consideration below.
- 4.15. Furthermore, Policy EH1 states that proposals that support the economy and social wellbeing of communities located in the AONB will be **"supported"**, provided they are consistent with the great weight that must be given to conserving and enhancing the landscape and natural scenic beauty of the area. The proposed development, in providing for the business needs of the caravan park, as well as the needs of holidaymakers, complies with the aims of this part of the policy.
- 4.16. Policy EH2, 'Landscape character', states that new development should conserve and, where possible, enhance the intrinsic character, quality and distinctive natural and man-made features of the local landscape. Furthermore, development should avoid causing pollution, especially noise and light. In this case, there are no existing landscape features that would be directly harmed or affected by the proposed development, and the proposed hedgerow planting will serve to enhance the wider landscaping setting over time, once it has matured. It will have no adverse impact in terms of any noise or light pollution.

## Other Material Considerations

### National Planning Policy Framework (NPPF) (2021)

- 4.17. Paragraph 11 states that plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay; or, where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless: i) the application of policies in the Framework that protect areas or assets of particular importance (including AONBs) provides a clear reason for refusing the development proposed; or ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. In this case, the proposed development complies with relevant development plan policies, particularly Policies OS2 and E4.
- 4.18. Paragraph 8 states that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways: economic, social and environmental. The proposed development will be economically, socially and environmentally sustainable taking into account the economic benefits, opportunities created for tourism and leisure, and by causing minimum harm to the countryside. In terms of accessibility, users of the development will have access to a range of services and facilities located within the caravan park, as well as access to facilities located within nearby settlements.
- 4.19. Paragraph 81 states: ***“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development”***.
- 4.20. Paragraph 84 states planning decisions should ‘enable’ sustainable rural tourism and leisure developments which respect the character of the countryside. This has positive implications for the proposed development, that will utilise land established for caravans within a wider caravan site.
- 4.21. Paragraph 176 states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The scale and extent of development within all these designated areas should be limited. In this case, the scale and extent of the proposed development is limited, for reasons given elsewhere in this statement.
- 4.22. When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest (Paragraph 177). The

proposed development cannot reasonably be deemed as ‘major development’ in this context.

#### **Cotswold AONB Management Plan, 2018 to 2023 (September 2018)**

- 4.23. The Management Plan sets out the vision, outcomes, ambitions and policies to guide the management of the AONB for the period 2018–2023.
- 4.24. In providing a portrait of the Cotswold AONB (Chapter 3), it states that the main economic activities that influence the landscape of the AONB are farming and forestry, tourism, quarrying and house building, and that tourism is of major importance to the economy of the AONB.

Policy CE12 states: ***“Development in the Cotswolds AONB should be based on robust evidence of local need arising from within the AONB. Priority should be given to the provision of affordable housing, maintaining and enhancing local community amenities and services, and improving access to these amenities and services.”*** As established previously, there is clearly a need for the proposed development in this instance.



## 5. Main Assessment

- 5.1. Taking into account relevant national and local planning policies, as well as the baseline position as an important material consideration (i.e. the ability to site touring caravans across the application site on a permanent basis, an arrangement that is not uncommon at some other holiday parks), we consider that the main considerations for determining the acceptability of the proposed development in this case relate to: the principle of development; sustainability; landscape and ecology; transport and access. We address each of these in turn below.

### Principle of Development

- 5.2. The principle of siting touring caravans within the application site has already been established through the 2011 planning permission (Ref. 11/0432/P/FP), which has been implemented and does not prevent such units being stationed on permanent basis through the year (which, as stated previously, the Applicant is considering as a fallback if he is unable to secure permission for the 10 holiday lodges currently proposed).
- 5.3. The proposed holiday lodges will replace these touring pitches and provide a form of holiday accommodation which meets the increasing expectations of visitors for a higher standard of accommodation within an established caravan park. It will increase occupation during the out-of-season months, and generate additional revenue to enable the Applicant to continue to operate and invest in other environmental upgrades and improvements within the wider site. As such, it will comply with Local Plan Policies CO8, OS2 and E4.
- 5.4. As regards wider design and layout objects, the relatively modest scale of the development will be proportionate in relation to the wider caravan park site, and will serve to extend inwards - towards the central part of the caravan site containing other services and facilities - the adjoining area of land that has recently been developed for 6 holiday lodges/caravans. The pattern, layout and character of the additional holiday lodges, including the type and specification of the units themselves (that will have the appearance of lodges), will be compatible with the pattern of these 6 existing holiday lodges. At the same time, the layout will comply with model standards prescribed through the separate caravan licensing process. Consequently, the development complies with Policies OS2 and OS4 where applicable.
- 5.5. The 2018 planning permission for the 6 holiday lodges (Ref. 18/03199/FUL) contained a reasonably worded planning condition (Condition 5) to restrict the use of those lodges for holiday purposes only, and to preclude permanent residential use. We suggest that this same, identical, condition could be imposed for the additional 10 lodges currently proposed.
- 5.6. In a wider economic context, Paragraph 84 of the NPPF states that planning decisions should enable sustainable rural tourism and leisure developments

which respect the character of the countryside, which similarly our proposal complies with.

## Sustainability

- 5.7. As mentioned in the previous section of this report, Paragraph 8 of the NPPF refers to three overarching objectives associated with achieving sustainable development: economic, social and environmental.
- 5.8. Economically, as established, it will enable the business to adapt to meet ever-changing customer demands and spread occupation rates more evenly across any given year (given the type of accommodation, which compared with touring units would be more appealing to visitors during winter months). It is also anticipated that individual lengths of stay will increase due to the high-quality nature of the proposed accommodation. This will be of benefit to the business as well as the wider local economy. The development will help to safeguard existing jobs, provide better quality jobs (i.e. less seasonal) and create additional full-time jobs. Paragraph 81 of the NPPF states **“significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development”**. The proposed development meets this aim, as well as responding to wider changes in the need for different types of holiday accommodation.
- 5.9. In terms of social benefits, the projected increased revenue stream will help to maintain the existing facilities within the site. COVID-19 has shown the fragility of the tourism industry and boosting the trading period of the park outside of the main holiday seasons will increase the sustainability of these facilities, for both the community and visitors where applicable. The maintenance of these facilities will also contribute to the health and wellbeing of visitors. There also social benefits to the improvement in the quality of jobs on offer as well as the additional jobs. We have also set out in more detail the economic and socio-economic benefits in Section 3 of this report, as well as the overall need for the development.
- 5.10. Environmentally, the development will utilise an established caravan park site and associated infrastructure, cause minimum harm to the countryside, and additional landscape planting can be incorporated to secure environmental benefits, that can be controlled via planning conditions. The static caravans/lodges will incorporate as many energy saving measures as possible. As largely pre-fabricated units, they will be delivered to the site ready for siting, which will help to reduce vehicle movements as part of the construction process, leading to less environmental pollution due to reduced vehicle mileage. In addition to this, goods will continue to be sourced from local suppliers wherever possible.
- 5.11. For all these reasons, we consider that the development is a well-balanced mix of economic, social and environmental benefits, judged against the NPPF and other relevant planning policies, including Local Plan Policies CO8 and E4.

## Landscape and Ecology Impact

- 5.12. As regards impact on the landscape, as highlighted throughout this Planning Statement as a significant material consideration, the holiday lodges/static caravans will be situated within part of the caravan park where up to 15 touring caravans may currently be sited on a permanent basis throughout the year pursuant to the 2011 planning permission, and where planning permission has already been granted for the internal roads connecting through the application site.
- 5.13. As set out in the previous section with respect to Policy EH1, we consider that the proposed development for 10 holiday lodges will both conserve and enhance the landscape characteristics of the AONB in this location. In the immediate term, having regards to the tree/hedge planted situated along the outer boundaries, it will be barely visible itself from any public viewpoints outside of the site, and it would be seen in the context of other caravans situated within the wider caravan site, including the adjacent 6 holiday lodges.
- 5.14. Over the short-to-medium term, the proposed additional mitigation planting along the boundaries will help to screen any limited views of the development from further away. Here, a planning condition can be imposed to control the detail of the landscaping, including both the height and retention of additional hedges.
- 5.15. Policy EH1 states that proposals that support the economy and social wellbeing of communities located in the AONB will be supported, provided they are consistent with the great weight that must be given to conserving and enhancing the landscape and natural scenic beauty of the area. The proposed development meets both of these objectives.
- 5.16. Similarly, the development will conserve and enhance the intrinsic landscape character, in keeping with Policy EH2. No existing landscape features would be directly affected, and the proposed hedgerow planting will serve to enhance the wider landscaping setting over time.
- 5.17. In terms of ecology judged against Policy EH1, in utilising an established caravan site where touring caravan are currently sited, and where there are not any known ecological constraints or sensitive or protected habitats/species, there would be no adverse ecological impacts. The landscaping scheme provides an opportunity to enhance biodiversity and ecology within the site.

## Highway/Traffic Safety Impact

- 5.18. Policy OS2 states that development should be provided with safe vehicular access and safe and convenient pedestrian access to supporting services and facilities. Similarly, Policy T2 states that all development will be required to demonstrate safe access and an acceptable degree of impact on the local highway network.
- 5.19. As stated previously, safe vehicular access will be achieved via the existing caravan site. Highway safety will actually be improved as a result of the existing 15

touring pitches being replaced by 10 holiday lodges, whereby fewer touring caravans would be towed into the park, and there would be a net reduction in the overall level of traffic generated on the highway, particularly during the peak holiday season. As such, the proposal complies with Policies OS2 and T2.

## 6. Conclusions

- 6.1. Planning permission is sought for the use of land for the siting of 10 additional holiday lodges (static caravans) and associated infrastructure, to replace 15 touring caravan pitches. The potential for the application site to accommodate touring caravans on a permanent basis at present under current permissions is a significant material consideration in this instance, regarding the baseline position.
- 6.2. The principle of the proposed development is acceptable judged against relevant planning policies, as means of meeting a demand for the type of self-catering accommodation proposed, that will increase holiday occupation during the out-of-season months and help enable a prosperous and sustainable tourism economy.
- 6.3. The modest scale of the development will be proportionate in relation to the wider caravan park site, and will extend, inwards, the adjoining area of land that has recently been developed for 6 holiday lodges/caravans. The design and layout will also comply with these 6 existing units.
- 6.4. The development will provide a well-balanced mix of economic, social and environmental benefits, for reasons stated in our main report, judged against the NPPF and other relevant planning policies.
- 6.5. The site and wider park will remain as a caravan site in overall character. Having regards to the baseline position, the development will both conserve and enhance the landscape characteristics of the AONB in this location. It will be barely visible itself from any public viewpoints outside of the site, and it would be seen in the context of other caravans situated within the wider caravan site. Over time, mitigation planting (to supplement existing boundary planting) will help to screen any limited views of the development from further away.
- 6.6. Notwithstanding the above, in the event that the development was considered to have an adverse impact environmentally, in landscape or other terms, any such harm caused would be minimal and outweighed by the wider tourism and economic benefits. Here, we would draw attention again to Paragraph 81 of the NPPF which states: ***“Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.”***

