

An aerial photograph of a residential development, likely a holiday camp, during sunset. The scene is filled with numerous small, light-colored buildings, possibly chalets or cottages, arranged in rows and interspersed with lush green trees. The sky is a mix of deep blues, oranges, and yellows, with the sun low on the horizon. In the background, there are rolling hills and a body of water. The overall atmosphere is peaceful and scenic.

laister

PARTNERS IN PLANNING

Grandular Living Limited

Planning Application at
Land at disused Children's Holiday Camp
Main Road, Rolston, HU18 1XP

Supporting Planning Statement

Full Planning Application made under The Town and
Country Planning Act 1990 (as amended)

for

"Change of use of land for the siting of 50 holiday lodges,
with associated ancillary development including,
amenities lodge, landscaping and improved access"

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1. Introduction

- 1.1. This statement has been prepared by Laister Planning Ltd on behalf of the Applicant, Grandular Living Limited, to support a planning application submitted to East Riding of Yorkshire Council (the Council or Local Planning Authority/LPA) for the following proposal on land at disused Children’s Holiday Camp, Main Road, Rolston, HU18 1XP:

“Change of use of land for the siting of 50 holiday lodges, with associated ancillary development including, amenities lodge, landscaping and improved access.”

- 1.2. This Planning Statement supports a full planning application made under The Town and Country Planning Act 1990 (as amended), submitted via the Planning Portal ref. PP-11965234. It should be read in conjunction with other documents and drawings accompanying the application submission, which comprises of the following documents that form part of the planning application:

- Completed Application Form
- Completed Form 1: CIL Additional Information Form
- Site Location Plan Dwg. No. 1431-0001-01
- Illustrative Site Layout Plan Dwg. No. 3831-0012-001 Rev. D
- Topographical Survey Dwg. No. 20-216-01
- Costal Erosion Plan
- Flood Risk Assessment (incorporating a Conceptual Surface Water Drainage Strategy) prepared by RPS ref. HLEF84829
- Transport Assessment prepared by RPS ref. JNY10694-01A
- Landscape & Visual Assessment by RPS ref. JSL3831
- Ecological Appraisal prepared by Wold Ecology

- 1.3. Within this statement we set out the planning considerations relevant to the proposed development in the context of relevant planning policies and other material considerations. Section 2 describes the site and its relationship to the wider area and any relevant planning history, including pre-application discussion held with the LPA. Section 3 contains a brief description of the proposed development. Section 4 outlines the relevant adopted planning policy context and the proposal is assessed in Section 5; with conclusions drawn in support of the proposal in section 6. This will show that the proposal complies with the relevant policies in the statutory development plan and there are no material considerations that would prevent planning permission being granted.



2. Site Description and Context

The Site

- 2.1. The application site comprises of an area of land (former children's holiday camp) of some 2.1 hectares in open countryside abutting the North Sea on the east, and the B1242 to the west. The site is bounded by agricultural land to the south and north. The B1242 provides access to Hornsea which is approximately 1.8km to the north, and Aldbrough approximately 7km to the south.



Figure 1: Application Site Aerial Photograph. Image Source: Google Maps

- 2.2. The site was previously a World War II army camp, which occupied a number of huts. After the war, it was used as a children's holiday camp, with the children staying in buildings that had remained post war. It appears as though the site was last used in the 1980's. Presently, there are some remnants of the previous use of the site, such as a building, some hardstandings and tracks, and the original layout is still visible.
- 2.3. A proportion of the camp has been lost to coastal erosion, with approximately 40m being lost since 2003, however Google Maps aerial imagery suggests that there hasn't been any significant loss of the site area in the preceding 5 years to date.
- 2.4. A further detailed description on the site and the surrounding context is contained within the accompanying Landscape and Visual Appraisal accompanying the application and which should be read in conjunction with this planning statement.



- 2.5. A desktop examination of the East Riding of Yorkshire Councils public access planning facility and its search tools reveals no planning history. The Council have conducted a planning history search at our request and advise that they are unable to locate any planning applications relating to the site.
- 2.6. The site is located within Flood Risk Zone 1, which has the lowest level of risk. Rolston Sands, located to the east of the site, is shown to be located within Flood Zone 3 associated with tidal flooding. The site is raised significantly above Rolston Sands and is therefore considered to not be at risk from tidal flooding. The site does not appear to contain any heritage features.
- 2.7. The Councils planning policy map illustrates that the site is in a Coastal Change Management Area. However, the site is not located within any Green Belt or Area of Outstanding Natural Beauty designations, and there are no other historic or natural strategic or environmental constraints which affect the site.

Planning History Summary

- 2.8. The Council have carried out a full planning history search of the site, however they have not uncovered any existing or historic planning permissions. The only file that has been sourced is reference 'N4632' which contains a series of M.O.D files. We have not yet attended the Council Offices to view these files, however it is likely, given the information above, records of previous use or operation are held by the Council.
- 2.9. However, despite the cease of operation for a period of time, any planning permission or accrued rights remain extant. In support of this position there is case law which supports the point that a use of a site cannot be abandoned once the permission has been granted providing that it has been implemented and no other permission has been granted nor has another use taken place, which would supersede the original planning permission.
- 2.10. The Stockton on Tees case relates to a caravan park that was originally granted planning permission in 1961, and then ceased to be in operation for many years. When it sought to restart its use in 2009, the Local Planning Authority indicated that a fresh planning permission was required. On 27th July 2009, a Planning Inspector decided in Paragraph 18 in relation to a refused LDC application, the following:

"In this case, the use permitted by the 1961 permission has simply dwindled away such that it is now very many years since there was any appreciable use as a caravan site. Nevertheless, the 1961 planning permission was implemented, it has not been revoked and it has not been superseded by the use of the site for a different permitted or lawful purpose. The permission may therefore be

relied upon for the use of the land as a caravan site for up to 80 caravans, subject to the use being undertaken in accordance with the 1971 (sic – 1961) permission.”

- 2.11. The Planning Inspector granted the LDC on the Stockton case. The Council then proceeded to appeal the decision to the High Court. The High Court ruled alongside the principle of the rule established by Pioneer Aggregates (a well-known House of Lords case), where it stated in Paragraph 35:

“It follows that in this case, bearing in mind that it is a case in which there has been no use of the land other than that permitted by the planning permission first granted for use as a caravan site, I consider that the planning inspector was correct in law to come to the decision which he did. It follows that this appeal must be dismissed.”

- 2.12. With regards to this site, there is evidence that the site has been in use for some purpose, including as a children’s holiday camp, since the Second World War, and by the definition provided in the NPPF, should be considered previously developed land.

Pre-application Discussions

East Riding of Yorkshire Council – 19/11567/PREP Pre-application

- 2.13. A formal pre-application advice enquiry was submitted to the Council on 19th December 2019, which included the layout enclosed at Appendix 1. Following a meeting with Joanne Marshall on 9th March 2020, the case was reallocated to Amy Barrett due to COVID-19 pressures, before being returned to Joanne Marshall before a formal response (attached Appendix 2) was eventually received on 17th August 2020. It appears as though the details discussed at the pre-application meeting with Joanna Marshall were lost during the enquiry process. On this, the preapplication advice inaccurately refers to the Councils adopted policy, resulting in a negative pre-application response built on misunderstood planning policy. The main issue is identified as being that *“given the relatively short life span of the proposal being only for a possible 11 years, it is considered that the proposal would not comply with the guidance as set in policy ENV6 of the ERLP SD”*. We clarify those matters below.

Meeting Summary

- 2.14. At the meeting, it was confirmed that the site is not within one of the defined villages set out on the Policies Map of the adopted Development Plan. ‘Policy S4: Supporting Development in Villages and the Countryside’ of the East Riding Plan (2016) is clear that, outside of a development limit land will be regarded as the Countryside, meaning only certain types of development will be



supported. Development proposals for tourism are supported where they respect the intrinsic character of their surroundings.

- 2.15. Tourism developments, including accommodation, are encouraged to help strengthen and broaden the tourism offer across the East area in compliance with 'Policy EC2: Developing and Diversifying the Visitor Economy'. In the Countryside, proposals for tourism development will be supported where their scale and cumulative impact is appropriate for the location and, among others, involve new, expanded, upgraded or rolled back/re-located static caravan sites.
- 2.16. Because the site has been designated as a Coastal Change Management Area (CCMA), the relevance of 'Policy ENV6: Managing Environmental Hazards' and 'Table 11' with the policies supporting text, were explored, and it was clarified that coastal erosion presents a hazard that would need to be managed to ensure that development does not result in unacceptable consequences to its users, the wider community, and the environment.
- 2.17. It was discussed that the site is on a coastline at greatest risk of erosion in Europe. The case officer explained the Council will expect a Coastal Erosion Constraints Plan to inform a 'Roll-back' strategy to comply with Table 11. This means that, when cliff erosion reaches a pre-determined point, we must show that a number of lodges can be relocated away from the site, onto another park that has capacity to accommodate the units. It was put forward that the applicant owns existing and established sites with spare capacity at Little Eden (Bridlington), Applegrove (Scarborough) and Riverside Village (Lincoln). They would be able to accommodate the units subject to a 'Roll-back' scheme.

Pre-Application Response Summary

- 2.18. The Council's written response was received on 17 August 2020 (Appendix 2). The pre-application response correctly notes at page 2 paragraph 1 that Policy S4 and EC2 are of particular relevance, as they support tourism use (including accommodation) in countryside locations.
- 2.19. At page 2 paragraph 2, the site is recognised as being located within the designated Coastal Change Management Area (CCMA) where policy ENV6 applies. The Case Officer wrongly advises that policy ENV6 states that, "*within the CCMA proposals will be supported where the development is for a temporary use such as touring pitches, temporary car parking [...]*". The Case Officer advises that, '*This proposal would be for more permanent static caravan structures with associated decking and hot tubs and as such would not necessarily be temporary in their nature*'.
- 2.20. There are two key mistakes with these statements. The first is that Policy ENV6



does not state “where the development is for a temporary use such as touring pitches”. The second is that caravan sites are not distinguished in planning terminology as temporary touring pitches or permanent static caravans. These matters are explored in turn.

2.21. Policy ENV6, instead of stating that there is support for a temporary use such as touring pitches, states in part ‘F’ that proposals “Within the CCMA, will be supported where it

1) *Can be demonstrated that an appropriate temporary development, such as those included in Table 11, will contribute to the local economy and/or help to improve the East Riding's tourism offer”.*

2.22. Table 11 (reproduced in Appendix 3) provides a ‘Guide to appropriate development in the CCMA’ and divides development sites into three timescales for erosion to the cliff edge: present to 2025; 2025 to 2055 (30 years); and, 2055 to 2105 (50 years). Considering that the Strategy Document was adopted April 2016 (over four years ago) one may assume that ‘present to 2025 refers to 2016 to 2025, a period of nine years. In interpreting Table 11 one would expect the timeframes to be reflect timeframes of nine, 30 and 50 years from the present day.

2.23. Within the timeframe category of ‘present to 2025’, Table 11 advises that:

“Development within this zone will be strictly limited and temporary uses. Parts of this zone may be considered suitable for use for new and existing caravan parks, however, this should be linked to an agreed planned approach for adapting to coastal change in the future”.

2.24. Within the timescale of 2025 to 2055 Table 11 sets out “In addition to the development allowed in the present to 2025 zone, the only development allowed will be replacement, relocation and adaption of facilities and infrastructure deemed to be essential to support the continued operation of existing commercial/business uses”. Examples of suitable uses lists include, “Changes of use from permanent residential to other strictly limited temporary uses, including change of use to agricultural or tourism uses”.

2.25. Policy ENV6 and Table 11 are therefore supportive of new caravan parks within the CCMA where a planned approach for adapting to coastal change in the future is agreed. The policy does not restrict development to touring caravan use.

2.26. The pre-application response has set out on page 2 paragraph 4 that, “should a formal planning application be submitted, the provision of only 11 years for the site to be developed as a caravan site would not be supportable from a planning perspective as it would not comply with the uses highlighted in the



policy and would not constitute a sustainable form of development in accordance with policy ENV6 of the ERLP SD". However, it is not clear where the 11-year-lifetime of the proposal has been founded and the Council has provided no justification for this opinion. Nevertheless, the Applicant has therefore prepared a Coastal Erosion Constraints Plan which illustrate the site would have up to 8 years of full capacity use, before gradually falling back over a further 30-year period.

- 2.27. The pre-application response also seeks to distinguish between temporary touring caravans and permanent static caravans on page 2 paragraph 2. It is not appropriate to distinguish between touring caravans and static caravans. For planning purposes, both the Town and Country Planning Act 1990, and the Town and Country Planning (General Permitted Development) Order 2015 both adopt a singular definition. The definition within the 1960 Act provides that touring and static caravans are interchangeable. A touring caravan site is to all intents and purposes the same as a static caravan.
- 2.28. Had the pre-application advice accounted for this information, then it would have recognised that the proposal does comply with policy ENV6 and may have set out that a formal application could gain the support of officers.
- 2.29. The advice has confirmed any subsequent application would be assessed against the statutory development plan which comprises the adopted East Riding Local Plan. The Tourism Accommodation Study for the East Riding of Yorkshire Council (2016) and the National Planning Policy Framework 2021 are identified as other relevant documents that would bear weight in the determination of a planning application.



3. The Proposal

- 3.1. The applicant, Grandular Living Limited, are an established Holiday Park business with over extensive experience in the tourism sector, that operate a number of successful Luxury Holiday Park sites across the UK. Grandular Living Limited are committed to creating luxury design led, lodge retreats with emphasis on 'rest and relaxation', one where family and friends join together to reconnect, relax and unwind and also brings like-minded people together to create a community that exchanges not only ideas but also encourages a relaxed and tranquil environment which appeals to the family demographic.
- 3.2. The Applicant's vision in respect of the current proposals is to assist with the policy objective of increasing tourism accommodation and generating more staying visitors in the East Riding area, by developing a luxury holiday lodge site in a scenic location.
- 3.3. The proposed development consists of 50no. high quality holiday lodges that would be fabricated off-site and brought to site in one or two parts and would therefore fall under the definition of a 'caravan' in Section 29 (1) of the Caravan Sites and Control of Development Act 1960.
- 3.4. Unlike most other areas of planning, a dual control system exists between the 1990 Act and the 1960 Act which can cause some confusion. The conventional differentiation applied is that planning permissions should be issued mainly on the basis of the principle of the use and its external effects, and that site licences should be concerned with internal arrangements which affect only the users of the site and are primarily concerned with health and safety. The licensing process, using model standards, would dictate the precise layout and spacing of individual units, the requirement for ancillary development and other features of the caravan site.
- 3.5. These are sophisticated units manufactured in a factory-controlled environment. The units are designed in accordance with their own legislation and constructed to British Standards 3632: Specification for Residential Park Homes. It must be stressed that the proposed units are not for residential occupation – this is simply the standard they are designed to. BS3632 determines that products must meet the legal definition of a caravan as prescribed by the Caravan Sites Act 1968, which was amended in 2006, along with numerous other cross-referenced standards together with design and manufacturing criteria. All units have high specifications for insulation and energy efficiency which can be equivalent to or better than traditional build methods for dwellings. Units must achieve u-values of 0.35 W/m K for the walls and floor, and 0.2 W/m K for the roof. Doors and windows must not have u-values greater than 1.6 W/m K. The National Caravan Council operates an



energy rating scheme for which each unit must be assessed.

- 3.6. The units can be sited, serviced and occupied much more quickly than traditional built-on-site developments. They require limited groundworks, and the noise and general disturbance during the implementation/construction phase is much less because a large proportion of the construction work is undertaken off-site. This means significantly fewer journeys for construction traffic which reduces the impact of construction on an area. Because they are built in a factory environment, the controls over fabrication are more controlled resulting in much better performance against environmental considerations than traditional built development. This includes selection and consumption of raw materials, the use of energy efficient appliances and fittings, right through to waste management. The units have a lifespan of 70+ years, and the units require much less maintenance than a traditional building.
- 3.7. Each holiday lodge would be accompanied with provision of one parking space. Vehicle access to the site is proposed to continue from the B1242 with the existing access undergoing improvements.
- 3.8. A bespoke lodge unit would be located in the northwestern corner of the site providing reception and amenities facilities for users of the park.
- 3.9. On all of this, the units would utilise a material and colour palette that is sympathetic and complementary to the surroundings. Internally, the roads and hardstandings will be constructed with free draining materials.
- 3.10. Extensive new planting of native species rich hedgerows, trees and shrubs will support the sites appearance in the wider countryside, particularly along the northern, western and southern boundaries of the site, softening its appearance within the existing wider landscape.
- 3.11. The site has been generously laid out in terms of densities and open space that reflects the applicant's aspirations to deliver a quality tourism scheme in a picturesque surrounding. The units in the holiday park have been positioned to ensure they get the best of the sun and views. The proposals also include a pond, which is an important feature not only in terms of the site's drainage, but also for enhancing the site's aesthetics and providing support for wildlife and an uplift in the site's general biodiversity opportunities.
- 3.12. To ensure the site remains open for tourism accommodation, the Applicant would operate strict rules to mitigate any risk of people living there full time. This is achieved by performing annual checks on council tax and electoral roll, as well as keeping an up-to-date register of the names of all owners/occupiers of individual caravans on the site, and of their main home addresses.



- 3.13. To reflect this, the applicant respectfully requests that the following be applied as a planning condition:

“The holiday units hereby permitted shall be used as holiday accommodation only and shall not be occupied as a person’s sole or main place of residence. The owners/operators shall maintain an up-to-date register of the names of all owners/occupiers of each individual unit on the site, and of their main home addresses, and shall make this information available at all reasonable times to the Local Planning Authority.”.

Need For Development

- 3.14. The application site benefits from a location which would be convenient for occupants to access popular tourist destinations within the East Riding area such as the resort towns of Hornsea, Bridlington and Withernsea. These settlements provide many traditional seaside attractions and activities for tourists, and many historical buildings and heritage sites. Tourism is an important industry in the region and makes a significant contribution to the economy through the creation of jobs and the financial support it provides to local services and industry.
- 3.15. This section takes a closer look at the specific trends affecting tourism in the area and identifies the opportunity for the current proposal to address these matters in a manner that will ensure that the development contributes to the growth of sustainable tourism in the county.

Tourism Trends and Contribution to the Economy

- 3.16. The adopted local plan rightly identifies tourism as a key contributor to the economic success of the district. Research carried out by the Office for National Statistics (ONS) further highlights the continuing importance of the tourism sector to the national economy, but also the impacts that the Coronavirus has had on the sector. The travel and tourism industries contributed 6.7% of all gross value added (GVA) in the UK in 2018 (ONS; Coronavirus and the impact on the UK travel and tourism industry 2021¹).
- 3.17. On a regional basis, figures released in 2019 by “Welcome to Yorkshire” - Tourism Data Report (Appendix 4) indicated that tourism was worth £9bn to

¹Office for National Statistics (ONS) Coronavirus and the impact on the UK travel and tourism industry, last accessed on 06/06/2022 online at <https://www.ons.gov.uk/businessindustryandtrade/tourismindustry/articles/coronavirusandtheimpactontheuktravelandtourismindustry/2021-02-15#:~:text=The%20travel%20and%20tourism%20industries,for%20large%20periods%20of%20time>.



the Yorkshire economy. Since then, the coronavirus (COVID-19) pandemic has impacted the sector heavily in 2020 and into 2021, with government restrictions both in the UK and worldwide preventing tourism for large periods of time.

- 3.18. ONS Travel Trends 2019 (Appendix 5) indicates there was a 1% increase when compared to 2018 on visitors to the UK from overseas residents (40.9 million visits). Visitor expenditure was a total of £28.4 billion, an increase of 7% compared with 2018 and overseas visitors spending more than in 2018 (increasing from £91 in 2018 to £98 in 2019); with an overall average spend per visit increasing from £658 in 2018 to £696 in 2019.
- 3.19. More recent figures release by ONS in June 2022, (ONS Travel Trends 2021 attached at Appendix 6) highlight the impacts of COVID with main points from the research highlighting:
- Overseas residents made 6.4 million visits to the UK in 2021; this was 43% less than in 2020 as travel continued to be reduced because of the coronavirus (COVID-19) pandemic.
 - Overseas residents spent £5.6 billion on their visits to the UK in 2021; this was 9% less than in 2020.
 - UK residents made 19.1 million visits abroad in 2021, which was 20% less than the previous year and was because of the continued travel restrictions.
 - UK residents spent £15.5 billion on visits abroad in 2021; this was a 13% increase on 2020.
 - The average length of stay for both overseas residents' and UK residents' visits was much longer than in previous years and resulted in a higher spend per visit.
- 3.20. According to Visit England² in 2019, tourism in England contributed £106bn to the British economy (GDP) when direct and indirect impacts are taken into account, supporting 2.6 million jobs. When only direct impacts were considered (i.e. excluding aspects such as the supply chain), the contribution was £48bn, with 1.4 million jobs directly supported.
- 3.21. Research carried out on behalf of the UK Caravan and Camping Alliance (UKCCA) in 2019 - "2019 Economic Benefit Report: Holiday Parks and Campsites UK" (Appendix (7)) highlights that UK holiday park and campsite sector makes a substantial contribution to the UK tourism economy, generating £9.3bn in visitor expenditure, equivalent to £5.3bn GVA and supporting 171,448 FTE jobs.

² Visit England - 'The Value of Tourism in England'; last accessed on 24/02/2023 online at: <https://www.visitbritain.org/value-tourism-england>



- 3.22. In 2019 the UK holiday park and campsite sector accounted for 8% of the tourism sector's GVA. Visitors to UK holiday parks and campsites stayed up to 74% longer and spent up to 60% more than the national tourism average.
- 3.23. ONS data, via the International Passenger Survey (Appendix 8), highlighted that UK tourism was recovering following the pandemic and that January through September 2022 saw continued growth in inbound visits and that the UK welcomed 21.2 million inbound visitors. Holidays accounted for 39% of all inbound visits. For 2023, Visit Britain³ forecasts 35.1 million visits in 2023 (86% of the 2019 level and 18% higher than in 2022) and £29.5 billion spend (104% of the 2019 level and 14% higher than in 2022). This highlights the confidence in the UK tourism industry and the demand for 'staycation accommodation'.
- 3.24. Statistics show that UK holidays saw year-over-year growth of over 500 percent in 2020 compared to 2019. While travel trends are starting to recover, it remains uncertain how quickly international travel will recover following COVID-19 as there are many other significant factors influencing decisions to travel including rising costs and the current cost of living crisis. As evidence by the forecasts above 'Staycations' within the UK remain a likely popular option until these factors are met, and the expectation is that UK holidays will remain more popular than they were pre-Covid. International unrest will also not help in the recovery of overseas holidays, and high-profile problems at UK airports and significant rises in cost of living also continue to dominate national news.
- 3.25. Media reports suggest that four in five UK residents planned/took a staycation in 2021, and that further consumer research suggests it will continue beyond that as Brits settle into new holiday habits post-pandemic.
- 3.26. A Visit England All Trip Purposes 2019 Report (Appendix 9) identifies that in 2019, 29% of domestic trips were accommodated in self-catering units such as camping and caravans.
- 3.27. A report prepared by Schofields Insurance - "The Rise of Staycations – UK Travel in 2020/21"⁴ identified that there had been an increasing trend for domestic travel, partly as a result of changes in consumer preference, such as the impact of flying on climate change which might account for an increase in domestic travel and expenditure for the rest of the year.
- 3.28. The report also identifies that consumers are worried about the financial futures of travel companies as well as their own finances, and therefore UK

³ Visit Britain 2023 Tourism Forecast; last accessed on 24/02/2023 online at: <https://www.visitbritain.org/2023-tourism-forecast>

⁴ Schofields Insurance - The Rise of Staycations – UK Travel in 2020/21; last accessed on 24/02/2023 online at: <https://www.schofields.ltd.uk/blog/5980/staycations-uk-travel-2020-21/>.



offers a more financially safe option for holidays.

3.29. More recent research carried out by Sykes Holiday Cottages⁵ (one of the country's leading holiday accommodation agencies) in July 2022, again highlights the growing demand for staycation accommodation. The report notes a number of key statistics taken from their survey results:

- On average Brits will take 3 UK breaks - up from 2 in 2021
- 77% of Brits will holiday in the UK at some point in 2022 versus 75% last year
- 35% will holiday at home this year because of budget pressures

The Supply of Tourism Accommodation

3.30. Given the site's location, the land at Rolston Camp is very well placed to provide holiday accommodation to support tourism in the East Riding area, particularly as the proposal site provides an ideal location for tranquil holidaying.

3.31. Holiday accommodation statistics are available on a regional basis from Visit England. The Occupancy Survey for July 2022 (see Appendix 10) indicates that room occupancy rates were at 84% for the Yorkshire & Humberside region in 2022, representing a 12% increase to the rate of occupancy for the same period in the preceding year. This high level of occupancy is generally indicative of the region's strong domestic tourism performance.

3.32. We now turn our attention to the wider economic benefits of the development.

Benefits to the Local Economy

3.33. Tourism-based projects generate economic impacts in a number of ways. These include:

- The impact of any construction activity, including direct employment arising on and off site, and indirectly in suppliers of materials and services.
- The impact of the project during its operational phase. The operation will employ people directly on site, but it will also generate indirect employment in suppliers of goods and services used by the establishment during its operation.
- External impacts arising from the activities of visitors to the project when they are away from the site itself. These activities will have direct impacts in other establishments benefiting from visitor expenditure, and also indirect impacts as those establishments in turn purchase goods

⁵ The Sykes Staycation Index for 2022; last accessed on 24/02/2023 online at: <https://www.sykescottages.co.uk/blog/staycation-index-2022/>



and services from suppliers.

- Additional income impacts also arise as employees whose jobs are directly or indirectly supported by visitor spending themselves spend money on leisure and other activities.

3.34. Holiday parks are a key contributor to the income of rural economies in popular tourism areas and sustain both full-time and seasonal jobs. It would be expected that a development on this scale would bring about substantial additional economic benefit for the local community as a result of direct spending by the owner of the park and by the spending of visitors to the holiday park.

3.35. The development will increase demand as well as revenue and also help to secure the long-term sustainability and viability of the applicant's wider holiday accommodation business, including providing and maintaining the range of ancillary services and facilities, as well as delivering environmental improvements and mitigation across the site.

3.36. Based on a review of existing holiday parks in the local area and our own market intelligence, it would not be unreasonable to expect an income of at least £700 per unit per week for the holiday units, in high season. The effect of this additional income flow would be passed through to the locality in the normal course of business, through the purchase of products and services from local suppliers, and also through the payment of utility bills and business rates to the Council and from the spending of visitors.

3.37. Research by the BH&HPA in 2012 (Appendix 11) found that holiday parks generate average visitor spending of £11.25 per person per day. Using this figure, it can be estimated that the proposed new units (with the park occupied at 44% capacity, for 23 weeks a year – an industry recognised figure, with each unit sleeping 3.49 people on average) would generate approximately £139K (£6,321 per unit) per year of spend in the community. This figure is based on averages, and is subject to a significant scope for improvement, where the park achieves greater than 44% occupancy. This can be reasonably expected given the indication of high demand for holiday accommodation already discussed in this report, and that the type of accommodation and range of on-site facilities would appeal to holidaymakers across much of the year, irrespective of the season.

3.38. The 2012 research, while a good baseline, is clearly now somewhat out-of-date. To provide some context with regards to potential current day figures using Consumer Price Index (CPI) inflation data from the Office for National Statistics, through the Bank of England's 'Inflation Calculator', goods and services costing £11.00 in 2012 would now cost £14.48 in January 2023, representing a 31.6% increase. Applying inflation the increase and using the



above calculations the proposals would in today's economic climate generate approximately £183K (£8,319 per unit) per year of spend in the community.

3.39. This information indicates that the proposed development will contribute significantly to the wider local economy, as a result of increased spend associated with holidaymakers visiting and using such services, facilities and attractions elsewhere.

3.40. Taking into account the substantial economic benefits that are in line with relevant national and local planning policies (reviewed in Section 4 of this report), we consider that the proposed development will be in the public interest, noting also Paragraph 81 of the NPPF which states that ***“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. Relevant Planning Policy Context

- 4.1. This section summarises key Development Plan policies as well as other material planning policies, which we consider to be of relevance in the assessment of the current application. 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.
- 4.2. For the purposes of this planning application the Development Plan of East Riding of Yorkshire Council currently consists of:
 - The East Riding Local Plan 2012–2029 Strategy Document (ERLP SD)
 - Allocations Document adopted in 2016
 - Adopted Policies Map.
- 4.3. The authority also has a number of adopted Supplementary Planning Documents (SPD), including the Sustainable Transport SPD (2016) and which are relevant to consideration of development of the site.
- 4.4. The following policies of the Development Plan are regarded as being relevant to consideration of the development proposals in this instance.

Development Plan

East Riding Local Plan 2012–2029 Strategy Document (ERLP SD) (2016)

- 4.5. Policy S1 (Presumption in favour of sustainable development) reflects the NPPF's presumption in favour of sustainable development. It also sets out that the Council will adopt a positive and proactive approach in looking to secure development that improves the economic, social and environmental conditions in the East Riding area.
- 4.6. Policy S4 (Supporting development in Villages and the Countryside): Within the countryside this policy identifies tourism development (inter alia) as being appropriate and indicates support where proposals respect the intrinsic character of their surroundings.
- 4.7. Policy S8 (Connecting people and places) looks to secure new development that should ensure that people and places are well connected. Further, that proposals which facilitate integration between different modes of travel, especially walking, cycling and public transport, will be encouraged.
- 4.8. Policy EC1 (Supporting the growth and diversification of the East Riding



economy) looks to support development proposals, including tourism, to strengthen, diversify and encourage growth of the East Riding economy.

- 4.9. Policy EC2 (Developing and diversifying the visitor economy) looks to encourage tourism developments including attractions, facilities and accommodation, particularly those helping to meet existing deficiencies, and which help strengthen and broaden the tourism offer across the East Riding area. In the countryside, the policy offers support for proposals for tourism development, including inter alia new static and touring caravan sites, where their scale and cumulative impact is appropriate for the location.
- 4.10. Policy EC4 (Enhancing sustainable transport) seeks to ensure that new development is accessible and embraces sustainable forms of transport.
- 4.11. Policy ENV1 (Integrating high quality design) seeks to secure high-quality design and development which contribute to safeguarding and respecting the diverse character and appearance of the area through their design, layout, construction and use; and further reduce carbon emission through effective and efficient use of natural resources.
- 4.12. Policy ENV2 (Promoting a high-quality landscape) seeks to ensure that new development can be sensitively integrated into the existing landscape, and to protect and enhance landscape characteristics and features.
- 4.13. Policy ENV4 (Conserving and enhancing biodiversity and geodiversity) looks to ensure that new developments optimise opportunities to safeguard biodiversity and geodiversity, and where possible, deliver enhancements that result in a net gain in biodiversity.
- 4.14. Policy ENV6 (Managing environmental hazards) looks to ensure that environmental hazards, such as flood risk, coastal change, groundwater pollution and other forms of pollution, are appropriately managed to ensure that development does not result in unacceptable consequences to its users, the wider community, and the environment.
- 4.15. In respect of Policy ENV6 the site falls within an area designated as a Coastal Change Management Area (CCMA). Within the CCMA, proposals will be supported where it can be demonstrated that an appropriate temporary development (set out in Table 11 of the plan) will contribute to the local economy, and/or help to improve the East Riding's tourism offer. The table sets out that, where cliff edges are receding at their quickest (Present to 2025), development is strictly limited and restricted to temporary uses. Parts of this zone may be considered suitable for use for new and existing caravan parks, however this should be linked to an agreed planning approach for adapting to coastal change in future. The most seaward portion of this zone would exclude all development and temporary uses to provide a safe buffer from



the impacts of coastal erosion. The extent of the exclusion buffer would be based on coastal monitoring data and advice on proposals should be sought from the Council's Flood and Coastal Erosion Risk Management Team.

- 4.16. It must be ensured that the development is safe from the risks associated with coastal change for its intended lifespan. The development must not have an unacceptable impact on nature conservation, heritage and/or landscape designation. It must be ensured that the site can be vacated as a result of relocation/roll back or expiry of a temporary permission, will be cleared and restored to a natural state, with net sustainability benefits and, where appropriate, public access to the coast; and the development must have an acceptable relationship with coastal settlements in relation to character, setting, residential amenity and local services.

Other Material Considerations

Tourism Accommodation Study (2016)

- 4.17. The Tourism Accommodation Study produced in September 2016 seeks to inform the preparation of a 'Tourism Accommodation Supplementary Planning Document (SPD) for East Riding. The SPD has not yet been prepared, however there are findings in the Tourism Accommodation Study that bear relevance.
- 4.18. The report sets out that, fundamentally, there is confidence and optimism in the tourism accommodation sector. Businesses believe tourism will be a growth sector and are investing accordingly. It is likely that this optimism will act as a catalyst for further expansion and improvement throughout the tourism accommodation industry.
- 4.19. From the perspective of tourism development, the study suggests that applications for tourism accommodation should show they can enhance the local character and engage new visitor audiences. Meanwhile, there is an onus on providing new tourism accommodation development. Such development should continue to be subject to holiday occupancy conditions to control the development, and to ensure unsustainable locations are not used for permanent residential purposes.

National Planning Policy Framework (July 2021)

- 4.20. At the national level planning guidance is contained in the NPPF and the Planning Practice Guidance (NPPG). In July 2021, the Government issued a revised National Planning Policy Framework (NPPF), which sets out the Government's planning policies for England and how these should be applied. The NPPF is a significant material consideration in planning decisions.
- 4.21. A presumption in favour of sustainable development is at the heart of the NPPF



and is to be seen as the golden thread running through both plan making and decision-taking (paragraph 11). For application decisions this means *“approving development proposals that accord with an up-to-date development plan without delay”*.

- 4.22. In this instance, we consider that the proposal complies with the Development Plan, for reasons set out elsewhere.
- 4.23. Paragraph 8 states that there are three overarching objectives to achieving sustainable development: an economic objective; social objective; environmental objective. The proposal development is sustainable judged against these objectives (for reasons that we expand upon in the subsequent section).
- 4.24. Paragraph 84 states that decisions should ‘enable’ sustainable rural tourism and leisure developments which respect the character of the countryside. Similarly, this supports the principle of the type of development proposed.
- 4.25. Paragraph 92 states that planning decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles; for example, through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
- 4.26. Paragraph 98 stresses the importance of high-quality open spaces and opportunities for sport and physical activity in terms of the health and wellbeing of communities; and further that such can deliver wider benefits for nature and support efforts to address climate change.
- 4.27. In terms of promoting sustainable transport objectives the NPPF (Para. 105) states that the planning system should actively manage patterns of growth in support of the achievement of promoting sustainable transport. However, notes that opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.
- 4.28. The NPPF (Para. 110) advises that in assessing specific applications for development, it should be ensured that:
 - a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
 - b) safe and suitable access to the site can be achieved for all users;
 - c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design



Code; and

- d) and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

4.29. Further at para. 111 that: *'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe'*.

4.30. Section 14 of the NPPF relates to meeting the challenge of climate change, flooding and coastal change. Having particular regard to Flood-Risk requires appropriate assessment of potential impacts arising from new development; adopting a risk based sequential approach to flood risk, to avoid high risk areas and steer development to areas at lower risk. As well as minimising risk to the development itself, development should not increase flood risk elsewhere.

4.31. Section 15 of the NPPF relates to conserving and enhancing the natural environment. Para. 174 states that planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity. Para. 180 further states that opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.



5. Planning Assessment

5.1. Having regard to the above planning history and planning policy context, the following key planning issues are considered of most relevance to this proposal:

- The Principle of Development
- Design and Impact on Landscape
- Highway safety and accessibility
- Sustainability
- Ecology and Biodiversity
- Flood Risk and Coastal Erosion

5.2. We address each in turn below.

Principle of Development

5.3. The NPPF contains policy guidance for achieving sustainable development for a number of themes and topics, including sustainable transport, building a strong, competitive economy; supporting a prosperous rural economy; protecting Green Belt land; conserving and enhancing the natural environment.

5.4. In terms of promoting a sustainable economic environment the NPPF (para. 81) states that: *‘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** [LPL emphasis]. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future’.*

5.5. Further, that decisions should enable sustainable rural tourism and leisure developments which respect the character of the countryside (para. 84). The NPPF further notes that decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements and in locations that are not well served by public transport (para. 85) .

5.6. The East Riding adopted Local Plan explains the area’s proximity to popular destinations makes it an attractive place for visits, and a popular destination for overnight stays. Policy S4 is explicit that development will be supported to help maintain the vibrancy of the Countryside subject to criteria. Criteria 11 allows for tourism development in the countryside where it respects the



intrinsic character of its surroundings. The development of new tourist attractions, including the provision of new accommodation to facilitate the opportunity for overnight stays, is therefore supported.

- 5.7. Tourism in rural areas, which benefits business communities and visitors and respects the character of the countryside is supported. In an effort to ensure the proposal respects the intrinsic character of the site which has a historic tourism use, and its surroundings, a landscaping assessment and mitigation scheme has been prepared, and the layout has been developed to have a minimal impact. The proposal therefore accords with the policy.
- 5.8. The supporting text for Policy EC2 sets out in Section 7.17 that tourism is an important part of the East Riding's economy. The challenge for East Riding is to develop and diversify the tourism offer by capitalising on the rural landscapes, among other areas. Specifically, new static caravan sites are supported by the local plan where their scale is appropriate for the location. The scale of the proposed development is small, contained, and well screened through the proposed landscaping scheme, and the proposal accords with the policy.
- 5.9. The proposed development is expected to promote physical activity and encourage people to venture out into the countryside on foot or by bicycle. The site is within approximately 190m of a public right of way which provides access to the countryside and linkages to other public rights of way. As such, while the development would not be car free, it is anticipated that people will drive to the holiday park and then walk or cycle to enjoy their surroundings. As a result, we do not anticipate this development to have a significant impact on the car movements within the area, other than those created by visitors arriving and departing the site and taking part in tourist activities further from the site. This means the development proposal ensures, insofar as is possible given its location, that people and places are well connected in accordance with Policy S8.
- 5.10. We consider that the proposed development fully accords with the development plan and NPPF by providing a tourism asset in an area which has potential to be a successful tourism site for many years. The proposal seeks to strike a balance between visitor numbers and biodiversity, landscape, and amenity.

Design and Impact on Landscape

- 5.11. The Government attaches great importance to the design of the built environment within the NPPF. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.



- 5.12. These aims are also echoed within Policies ENV1 and ENV2 of the ERLP SD which seeks to secure high-quality design and development which are sympathetic and contribute to safeguarding and respecting the diverse landscape character and appearance of the area.
- 5.13. The application is supported by Landscape and Visual Appraisal by RPS, which should be read in conjunction with this planning statement. The report concludes that the national and regional character, night-time and visual effects would suffer minor or negligible adverse impacts as a result of the development, however, these would not be significant. Overall, the report concludes that with the introduction of the proposed new planting, the development proposal would maintain the character and quality of the wider landscape, be sympathetic to the local coastal farmland character of the area and could be phased back in scale and the site restored to grassland within 50 years and would not result in significant harm to the views and visual amenity within the area.
- 5.14. Caravan parks are not an uncommon feature of the landscape of the area which is assessed to have no extraordinary overall quality but of high value to the tourist industry of the East Riding area. The development proposal has been designed with a robust landscaping scheme so that it sensitively integrates into the existing landscape and demonstrates an understanding of the intrinsic qualities of the landscape setting.
- 5.15. The site layout would enable the retention and reinforcement of the existing boundary trees and scrub, with significant new planting incorporated throughout the site as part of a robust landscaping scheme. Existing site boundary vegetation would be extended and infilled as required using native species tree and shrub planting. Areas of wildflower grassland and wetland species are proposed at locations within the site and with appropriate management would enhance grassland diversity.
- 5.16. The landscape proposals seek to reflect the character of the Application Site and the surrounding landscape by establishing vegetation using native species appropriate to the local area, which would provide connectivity to the surrounding area, reinforce screening and as an enhancement to the existing site conditions.
- 5.17. Overall, it is considered that the application submission demonstrates that an appropriate form of development will be delivered which respects the intrinsic character and appearance of the area and that such can be successfully and sympathetically integrated into the landscape, in accordance with policies ENV1 and ENV2. of the development plan and national policy guidance within the NPPF.



Highway safety and accessibility

- 5.18. The application is accompanied by a Transport Statement (TS) prepared by RPS Transport Consultants which should be read in conjunction with this planning statement. This examines the existing context and assesses the potential impacts of the proposed development both in terms of impacts on the highway network and highway safety.
- 5.19. The site is accessed via an existing access on to the B1242, a single carriageway, lightly trafficked, road subject to a 50 mph speed limit with no street lighting or footways along its length within the vicinity of the site. There are no weight restrictions along the B1242.
- 5.20. Examination of highway safety records did not highlight any existing road safety issues that could potentially be exacerbated by the proposed development.
- 5.21. A survey of passing traffic speeds and the geometry of the proposed improved access arrangements detailed within the TS at appendix 4 demonstrate appropriate visibility at the access is achievable for vehicles travelling to the posted speed limit of 50 mph. The proposed new access arrangements have been designed so that the geometry of the access would not only accommodate both the day-to-day vehicle movements but also larger vehicles attending the site for installation of the units.
- 5.22. The proposals include appropriate on-plot parking of one space per unit, with 4 no. spaces provided to the front on the amenity building. Each parking space would be of permeable Grasscrete construction, with permeable block-paved turning heads incorporated into the wider layout to provide appropriate manoeuvrability within the site that vehicle can easily enter and leave the site in a forward manner.
- 5.23. The TS identifies that while there are likely to be modest increases in traffic flows associated with the proposal, in traffic levels on the adjoining local highway, such would be imperceptible and lie with the range of typical daily traffic variations and would not create any severe impacts on the highway network.
- 5.24. In terms of access for modes other than by motor vehicles, the B1242 does not provide bound footways or cycle lanes, however, given low levels of traffic would be suitable for cyclists. Sustrans and the Route You website promotes local cycle routes in the vicinity of the site, with routes leading into Hornsea in the north and Mappleton in the south. Further on-road cycle routes extend from these routes which provide a network of routes to the surrounding countryside.



- 5.25. While it is acknowledged that the likelihood is that visitors to the site would be largely dependent on the use of private vehicles, there are options for more sustainable forms of transport. The nearest bus stop to the proposed development is to the north, at the Rolston Main Road, approximately 260m from the access of the proposed development. This is served by the number 129 bus service (Withernsea to Hornsea, via Aldbrough) which provides 4 no. services per day that would provide access to both local and wider facilities and services and offer options for sustainable modes of transport.
- 5.26. Hornsea is to the north of the site. A variety of existing facilities are within the town. These include a co-op, post office, restaurants, bars, leisure facilities and transport facilities. Hornsea is within cycling distance of the site.
- 5.27. In terms of pedestrian movements to the north of the site are Mappleton footpath number 1 and 7, which provide access into the local countryside and connect to the wider PROW network.
- 5.28. The TS explored the accessibility and local transport options for the site, and found that overall, it is considered that the proposals can achieve a safe and suitable means of access, and the proposed development of holiday lodges will not have a severe impact on the road network or an unacceptable impact of road. In this regard, the proposal is considered to not conflict with Policy EC4 of Government guidance within the NPPF.

Sustainability

- 5.29. In terms of the strands of sustainable development identified under Paragraph 8 of the NPPF firstly, economically, the proposed development will secure economic benefits for jobs and the local economy. These include:
- The impact of any construction activity, including direct employment arising on and off site, and indirectly in suppliers of materials and services.
 - The impact of the project during its operational phase. The operation will employ people directly on site, but it will also generate indirect employment in suppliers of goods and services used by the establishment during its operation.
 - External impacts arising from the activities of visitors to the project when they are away from the site itself. These activities will have direct impacts in other establishments benefiting from visitor expenditure, and also indirect impacts as those establishments in turn purchase goods and services from suppliers.
 - Additional income impacts also arise as employees whose jobs are directly or indirectly supported by visitor spending themselves spend money on leisure and other activities.



- 5.30. In addition to the above, as we discuss previously, holiday parks are a popular form of tourist accommodation which is key contributor to both the local and nation economies.
- 5.31. The social aspect of sustainability is met, in that the proposal will result in the creation of a high-quality environment for people to stay and relax, away from the stresses of everyday life, and enjoy not only the immediate setting but also the wider area; and with easy access to the open countryside and opportunities for cycling and walking promoting a healthier lifestyle, to the significant benefit of general health and wellbeing.
- 5.32. Turning to the environmental aspect of sustainability, the site is not subject to any statutory ecological designations or heritage assets. The development area is not within an area of higher risk of flooding as defined by the Environment Agency flood map.
- 5.33. All the proposed holiday units are of high-quality design and the use of sustainable construction methods. Given the units are built in a factory environment, the controls over fabrication are more controlled resulting in much better performance against environmental considerations than typical bricks and mortar constructions. This includes selection and consumption of raw materials, the use of energy efficient appliances and fittings, right through to waste management. Reduced flow taps and showers and dual flush toilets would be employed minimising water consumption across the site.
- 5.34. The proposals include significant new landscape planting which will benefit not only the visual amenities of the site but also enhancing biodiversity at the site.
- 5.35. For all these reasons, the proposal contributes to the dimensions of sustainable development as set out in the NPPF.

Ecology & Biodiversity

- 5.36. With regard to the consideration of matters of ecology and biodiversity Policies Policy ENV4 (Conserving and enhancing biodiversity and geodiversity) provides the local policy context for consideration of such matters; and are largely reflective of national guidance within the NPPF. The policy seeks to conserve and enhance the natural environment, and further ensuring the protection habitats or species of importance to biodiversity and geodiversity, and that proposals should seek to incorporate measures for biodiversity enhancement delivery wherever possible.
- 5.37. The application is supported by a Preliminary Ecological Appraisal prepared by Wold Ecology, with a survey of the site being carried out in June 2021, and this document should be read in conjunction with this planning statement.



While the survey is now some 18 months old the context of the site has not significantly changed, and it is considered that the general findings of the report remain relevant. The applicant is committed to providing up to date survey information prior to the commencement of any development, through an additional walkover survey to update results, and would be willing for such to be conditioned as part of any subsequent approval.

- 5.38. The results of the survey identified habitats present on site as being comprised of semi-improved grassland, bare ground and buildings. No features or species significant ecological interest were identified as being present on the date the survey was taken.
- 5.39. No species or habitats of local or national importance were identified to be at risk from the proposals. While recommendations are made in respect of appropriate working during any such construction phase, no further surveys are recommended.
- 5.40. The report highlights opportunities for biodiversity enhancements that will be achieved through additional landscape planting, including areas of native deciduous trees and scrub, that will provide habitat for a range of species (representing an enhancement on the existing habitat) and further, the provision of bird and bat boxes installed within hedgerows or mature trees and buildings, to provide nesting/roosting opportunities.
- 5.41. Overall, there would be no harm in terms of ecology and that the proposals would significantly enhance biodiversity opportunities at the site. The proposals demonstrate no conflict with the provisions and aims of local and national guidance in respect of protecting and enhancing the natural environment and the proposals are therefore considered acceptable in this regard.

Flood-risk and Coastal Erosion

- 5.42. The application is accompanied by a Flood Risk Assessment (incorporating a Conceptual Surface Water Drainage Strategy), and Coastal Erosion Constraints Plan.
- 5.43. The site is located within Flood Zone 1 and is therefore considered to be at a low risk of fluvial and tidal flooding. The site is also considered to have a low risk of flooding from all other sources.
- 5.44. EA mapping indicates that the majority of the site is at very low risk of flooding from surface water sources. A localised area in the eastern extent is at low to high risk of surface water flooding to a depth of below 300mm. No significant risks were identified in relation to any other flood risk sources.
- 5.45. The proposed development will result in a hardstanding of 0.515 ha. At this



stage, a Conceptual Surface Water Drainage Strategy has been prepared to provide an indication of the surface water management strategy for the proposed development. It is proposed to convey surface water runoff generated by the proposed development to an attenuation pond located in the southwestern corner of the site. The attenuation pond will provide 256.1 m³ of storage in order to restrict runoff to 5 l/s for all events up to and including the 1 in 100 year plus 40% event. Detailed drainage design will be required at the detailed design stage.

- 5.46. Surface water runoff stored within the pond will discharge into Acre Dike via a Hydrobrake or similar flow control device subject to receipt of appropriate LLFA and third-party consent.
- 5.47. It has been demonstrated that the proposed development meets the requirements of the Sequential and Exception Tests imposed under the NPPF.
- 5.48. Overall, it has been demonstrated that the development would be safe, without increasing flood risk elsewhere, and that a positive reduction in flood risk would be achieved.
- 5.49. In relation to coastal erosion and compliance with Policy ENV6, the policy indicates that proposals will be supported where it can be demonstrated that an appropriate temporary development such as this development will contribute to the local economy, and/or help to improve the East Riding's tourism offer. The significant benefits to the local economy and East Riding of Yorkshire's tourism offering are discussed above.
- 5.50. The proposed development maintains the most seaward portion of the site to exclude all development and maintain a buffer. The Coastal Erosion Constraints Map illustrates the anticipated rate of erosion and prescribes the buffer zone that would need to be maintained. In accordance with policy ENV6, the extent of the exclusion buffer is based on coastal monitoring data and advice on the proposal has been from the Council's Flood and Coastal Erosion Risk Management Team.
- 5.51. The Council's Coastal Explorer mapping indicates that the site is an area identified whereby the cliff edge will erode at a rate of 2.12m/year. Modelling has been undertaken by the applicant on this basis and displayed in the application's accompanying Coastal Erosion Plan. However, it should be noted that aerial imagery available on Google Earth (Figure 2 below) between September 2018 and June 2022 (latest aerial imagery available) suggests that there hasn't been significant erosion of the coastline adjacent the site in the 5 years preceding this application; and that therefore the supporting Coastal Erosion Plan could be considered to be a worst case scenario for the purposes of the current proposals.





Figure 2: Historic Aerial Photograph with Indicative site area September 2018 (left) and June 2022 (right). Image Source: Google Earth Pro Mapping

- 5.52. Notwithstanding the above, it has been demonstrated that the development is safe from the risks associated with coastal change for its intended lifespan. The proposal should have uninterrupted use for approximately 7 or 8 years, before rolling back over a further period of around 30 years, for a usable period in the range of approximately 35-40 years.
- 5.53. The policy asserts it must be ensured that the site can be vacated as a result of relocation/roll back or expiry of a temporary permission, will be cleared and restored to a natural state, with net sustainability benefits and, where appropriate, public access to the coast; and the development must have an acceptable relationship with coastal settlements in relation to character, setting, residential amenity and local services. When the units require being rolled back, they may be sold to other operators, or relocated to other sites within the applicant's ownership. The applicant owns the following parks, Little Eden (Bridlington), Applegrove (Scarborough) and Riverside Village (Lincoln), which benefit from planning permissions and have capacity to accommodate any displaced units that form part of this application as required by any roll-back requirements.

6. Conclusion

- 6.1. Policy S1 of the East Riding Local Plan 2012-2029 and Paragraph 11 of the National Planning Policy Framework Section Plans identify that decisions should apply a presumption in favour of sustainable development, and development proposals that accord with an up-to-date development plan should be approved without delay.
- 6.2. The proposals are considered to represent a sustainable form of development that would be compliant with the Statutory Development Plan and other material considerations, including the NPPF, which requires the planning system to do everything to support sustainable tourism and economic growth.
- 6.3. The proposals would support the visions and aims of the East Riding Local Plan in maintaining a high quality of life which retains the district's distinct identity, with a diverse and thriving economy; and further supporting the expansion of the tourist economy and the ability of the district to act as a tourist destination which attracts high numbers of visitors for longer stays.
- 6.4. The proposals comprise of high-quality holiday lodge units on land which has a historic and previously established use as a children's holiday camp. There is an acknowledged need for new tourist facilities including high-quality self-catering holiday accommodation to boost visitor numbers and meet demand in East Riding of Yorkshire, and the visitor economy is a key source of income and growth for the local rural economy across the district.
- 6.5. The proposals will deliver a wide range of significant economic, social and environmental benefits and have been designed to be wholly appropriate and sympathetic to the context. The proposals would not be to the detriment of the visual amenities of the site, highway safety, matters of ecology and biodiversity, flood-risk and drainage or residential amenity, and would not have a significant detrimental impact on the openness or character of the surrounding landscape.
- 6.6. In conclusion, the development would not result in any significant environmental harm or conflict with Development Plan policies in this regard. The principle of development is considered acceptable providing additional visitor accommodation, that supports both economic growth and tourism opportunities for the area and the rural economy.
- 6.7. Accordingly having regard to the relevant development plan, the provisions in the NPPF and all other material considerations, we conclude that the proposed development should be granted planning permission.



Appendix 1: 19/11567/PREP Pre-App Layout Plan

Appendix 2: 19/11567/PREP Pre-App Written Response

Appendix 3: Local Plan Policy ENV6 supporting Table 11

**Appendix 4: “Welcome to Yorkshire” – Tourism Data
Report 2019**

Appendix 5: ONS Travel Trends: 2019 Report

Appendix 6: ONS Travel Trends: 2021 Report

**Appendix 7: BH & HPA 2019 Economic Benefit Report:
Holiday Parks and Campsites UK Report**

**Appendix 8: International Passenger Survey by the ONS,
September 2022**

Appendix 9: Visit England – All Trip Purposes 2019 Report

**Appendix 10: Visit England – Occupancy Survey for July
2022**

**Appendix 11: BH & HPA UK Holiday Parks – Economic Impact
Summary 2012**

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