

LAND SOUTH OF HERON ORCHARD HOLIDAY PARK

Planning Supporting Statement

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Land South of Heron Orchard
Holiday Park
fv
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1 INTRODUCTION

- 1.1 This report has been prepared by RPS on behalf of Mr John Connors in support of a planning application for the change of use of land at to the south of Heron Orchard Holiday Park, Frostley Gate, Holbeach as an extension to the existing caravan site.

RPS Experience

- 1.2 RPS is one of the UK's leading providers of planning and environmental consultancy services to operators and developers of holiday accommodation providers, including hotels, self-catering apartments, lodges, caravans, glamping and camping. We are members of the trade body for Camping & Caravanning, the BH&HPA. From our work in this sector for 25 years, we have developed a good understanding of how councils and inspectors deal with occupancy issues and we also have a good understanding of the needs of operators and the need to be able to offer a flexible range options.

Site Location and Description

- 1.3 The site is situated 11km to the east of Spalding. The application site comprises the northern section of the open field directly to the south of the existing Heron Orchard Holiday Park on the west side of Frostley Gate, to the north of the B1165 Raven's Bank. The field is flat and enclosed to the north by existing hedgerow, and to the east and west by post and wire fencing. There is a farm immediately to the west, and another caravans site, Heron Cottage Camping and Caravanning, to the east. The remainder of the field to the south is in agricultural use, as is the land to the south of Raven's Bank.

Planning History

- 1.4 Planning permission was granted for the change of use of Heron Orchard Holiday Park from touring, camping and caravan park to a static holiday caravan park and touring caravan rally area on 31 March 2004 (H05-1126-03 refers)(the area outlined in blue on the accompanying Site Location Plan). Planning permission was granted for the provision of an additional 7 holiday homes on the existing site by notice dated 3 December 2010 (H05-0847-10 refers).
- 1.5 Application reference number H05-0622-18 dated 23 August 2018 permitted a new site layout showing a total of 28 no. static caravans. Under H05-0943-18, a further 10 caravans were introduced on to the site.
- 1.6 An application to vary condition 3 of H05-0847-10, 2 of H05-0622-18 and 3 of H05-0943-18 to allow all-year round occupation of the caravans was approved by notice dated 19 July 2019 (H05-0412-19). Condition 3 limits the static caravans to holiday accommodation only, and condition 5 states that no more than 38 static caravans shall be allowed on the whole of the holiday park at any one time.
- 1.7 RPS submitted a request for pre-application advice on 15 June 2020 (PE-00161-20). The comments raised by the Officer in his response dated 4 August 2020 by reducing the site area.

Proposed Development

- 1.8 It is proposed to change the use of the land from agriculture to an extension of the existing caravan site. It is proposed to use it on a seasonal basis for touring caravans. Access will be obtained through the existing site to the north.
- 1.9 The application does not include operational development, such as roads and caravan bases, as these are implemented by a separate process of licensing. The form and layout of caravans and related infrastructure is controlled by a separate licensing process under the Caravan and Control of Development Act 1960 ('the 1960 Act'). The 1960 Act describes the relationship of the licensing process with planning control. The licensing process effectively determines and controls the form and layout of the internal site, such as caravan density and road infrastructure. This is a separate and distinct process to planning which addresses the principle of use only. Part 5 of the Town and Country Planning (General Permitted Development) Order 1995 (as amended), confirms that development required by the conditions of a site licence under the 1960 Act constitutes permitted development. Planning considerations should therefore only relate to the use of the land for the intended purpose (in this case, being the siting of caravans), and not make any assessment of any operational development that would accompany the development.

2 PLANNING POLICY CONTEXT

Development Plan

- 2.1 The South East Lincolnshire Joint Strategic Planning Committee adopted the South East Lincolnshire Local Plan 2011-2036 (SELLP) on 8th March 2019. Policies 1 and 9 are relevant to the consideration of this application.
- 2.2 Policy 1 is the spatial strategy of the plan and states that in the countryside (where Heron Orchard is located) development will be permitted that is necessary to such a location and/or where it can be demonstrated that it meets the sustainable development needs of the area in terms of economic, community or environmental benefits.
- 2.3 Policy 9 states:
- "Proposals for tourism and visitor development which utilise and enrich the natural and built environment and existing attractions of South East Lincolnshire to the benefit of the local economy, visitors and local communities will be supported within the boundaries of settlements identified in Policy 1.*
- Outside these settlements, small-scale development to support the visitor economy, including farm diversification, equine development and fishing lakes, will be supported provided that proposals:*
- 1. do not conflict with neighbouring land uses;*
 - 2. are in keeping with the character of the locality; and*
 - 3. demonstrate a functional link with an existing rural attraction or farm enterprise.*
- Larger developments will only be supported outside settlement boundaries in exceptional circumstances, for instance to proportionally support or enhance the enjoyment of an established visitor attraction where this cannot reasonably be achieved from a town or village location."*

National Planning Policy Framework

- 2.4 Paragraphs 83 and 84 set out policies for supporting a prosperous rural economy. Paragraph 83 states that planning policies and decisions should, among other things, enable the sustainable growth and expansion of all types of business in rural and sustainable rural tourism and leisure developments which respect the character of the countryside. Paragraph 84 states that planning policies and 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.

3 ASSESSMENT

Principal of Development

- 3.1 In terms of Policy 1 of the SELLP, the development comprises a further modest extension to a well-established camping and caravan park. As noted in paragraph 4.4.1, Tourism is an important part of South East Lincolnshire's economy, generating £136.7million in 2012.
- 3.2 Paragraph 4.4.3 goes on to acknowledge that tourist facilities can offer benefits to local communities directly through employment, and indirectly, such as by supporting local food producers, local shops, pubs and restaurants. Given the importance of tourism to the local economy, and given the wider social benefits of the proposal, it is considered that the development of additional static caravans broadly complies with Policy 1.
- 3.2 In terms of SELLP Policy 9 (which is in itself compliant with the NPPFs policies on supporting a prosperous rural economy), this relates specifically to Tourism and, as paragraph 4.4.2 notes, seeks to ensure that a clearly differentiated tourism offer is established, to enable the area to compete better as a tourist destination. The development of approximately 10 additional caravans is considered to be small-scale and thus coming under the scope of the second paragraph of Policy 9. As far as the three criteria of this policy are concerned, the development would not conflict with neighbouring land uses. The site is adjoined by agricultural land to the south and west, and would continue to be so as a result of this development (criterion 1). There are a number of static caravans on the existing site, and so the general character of the site would remain unchanged. Wider views of the site from the north are limited, and any views that are possible will be seen against the backdrop of the existing Caravan Park (criterion 2). While the existing site is neither a rural attraction nor a farm enterprise, there will nevertheless be a clear functional link with the existing caravan park with a single point of access from the highway network (criterion 3). The development therefore broadly complies with Policy 9 of the SELLP.

Flood Risk

- 3.2 The application site is situated in Flood Zone 3. As such the application is supported by a Flood Risk Assessment (FRA).
- 3.3 Data provided by the EA identifies that the site is at risk of flooding in the event of a breach of tidal defences along the east coast. The site is not shown to be at risk of flooding from Main Rivers. Breach mapping provided by the EA indicates that the site would largely remain free from flooding during a 1 in 200 year 2115 breach event, however, parts of the eastern area of the site are shown to be potentially impacted by flooding up to a depth of 0.25 m. A linear area along the southern boundary of the site is shown to be impacted by flooding up to a depth of 0.5 m. The overall hazard rating for the site is largely classified as a very low to low albeit a small area in the south eastern area of the site has a hazard rating of Danger to Some.
- 3.4 The site is shown to have a low risk of flooding from all other sources.
- 3.5 A Flood Warning Evacuation Plan has been prepared separately to this FRA. The aim of the Flood Warning and Evacuation Plan is to ensure the safe evacuation of the site prior to the onset of flooding. It is recommended that the site is registered with the EA Flood Warning Service.
- 3.6 The FRA demonstrates that the development meets the Sequential and Exception Tests imposed under the NPPF.
- 3.7 Overall, it has been demonstrated that the development would be safe, without increasing flood risk elsewhere.

Access

- 3.3 As noted above, the site will be accessed via the existing site. The development will not require a new access from Frostley Gate or Raven's Bank. The existing access has excellent visibility in both directions, and it is not considered the development will be prejudicial to highway safety.

Landscape Impact

- 3.4 While the field the subject of this application is flat and relatively open, it is proposed to landscape the site to screen the site. It is worth noting however that it is only proposed to use the site on a seasonal basis, and so the site will be vacant during the winter months. Any views that there will be of the site will be against the backdrop of the existing static caravan site to the north, and to a lesser extent, the existing caravan site to the west (Heron Cottage).

Heritage

- 3.5 Bloodfold House is Grade II listed building fronting Raven's Bank situated 60m to the south west of the site. Given the close proximity of the existing caravans site to the heritage asset and given the proposed landscaping to further screen the development, it is not considered that the development would unduly harm the setting of Bloodfold House. The development will not impact on any other designated or non-designated heritage assets.

Sustainable development

- 3.5 In accordance with the NPPF, the proposal should be seen in the context of sustainable development. In this respect, the proposal is assessed against the three dimensions indicated in NPPF Paragraph 8.

Social Role

- 3.6 The proposal would provide significant social benefits, in improving access to the countryside and helping to maintain and enhance the vitality of critical local services and facilities, including public transport operations.

Economic Role

- 3.7 From an economic perspective, the proposal would increase the local spend, supporting local businesses and services. It would also create some employment during the implementation phase, and a limited amount of local employment (cleaning, maintenance etc.) once operational, and will support the existing Holiday Park business.

Environmental Role

- 3.8 In terms of environmental role, the proposal will introduce new landscaping which would create new and enhanced wildlife habitats.
- 3.9 The proposed development can therefore be considered to represent a form of sustainable development

Planning Balance

- 3.5 As noted above, planning law requires that applications for planning permission be determined in accordance with the development plan. Overall, it is considered that the development complies with the development plan, and indeed the emerging development plan. Any perceived conflict with policies would be limited and outweighed taking into account the significant overall economic and community benefits the holiday lets would generate, meeting an identified need. In addition to the local importance of tourism described above, clearly domestic tourism has a key role to play in the post Covid-19 economic recovery, and is an important consideration which carries great weight. Announcing a £10 million package for small businesses, Minister for Regional Growth and Local Government Simon Clarke MP said on 3 July 2020:

"Kick-starting domestic tourism will be key to our economic recovery."

- 3.6 On the same day, Tourism Minister Nigel Huddleston MP said:

"Our tourism sector is hugely important - creating jobs, supporting businesses and driving local economies in villages, towns and cities across the country. It is vital that we help the sector bounce back and give it the platform to recover when it reopens from tomorrow."

4 SUMMARY AND CONCLUSION

- 4.1 Planning permission is sought for the use of land to the south of Heron orchard Holiday Park as an extension to the existing caravan site. It is proposed to use the site on a seasonal basis for the siting of touring caravans. The application does not include operational development as this is a matter for the site licence issued under the Caravan and Control of Development Act 1960.
- 4.2 Landscaping is proposed around the boundary of the site to screen the development. Access is proposed through the existing holiday park development to the north. The development would be safe, and will not increase flood risk elsewhere.
- 4.2 The development complies with the development plan, and indeed the emerging development plan. Any perceived conflict with policies would be limited and outweighed taking into account the significant overall economic and community benefits the extended holiday park would generate, meeting an identified need. In addition to the local importance of tourism described above, clearly domestic tourism has a key role to play in the post Covid-19 economic recovery, and is an important consideration which carries great weight in the determination of this application.