Change of use of land for the site extension to accommodate 27 additional holiday caravans

Todber Valley Holiday Park, Burnley Road, Gisburn, BB7 4JJ

August 2015
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Status: Associate
Draft Date: April 2015

For and on behalf of GVA Grimley Ltd
1. **Introduction**

1.1 This Planning Statement has been prepared and submitted by GVA on behalf of our client, South Lakeland Parks Ltd, operator of Todber Valley Holiday Park, for an extension of the park to accommodate an additional 27 holiday caravans.

**South Lakeland Parks Ltd**

1.2 Todber Valley is one of several holiday parks owned by South Lakeland Parks across the UK. Todber Valley is located in an area where demand is high for static caravans and lodge pitches with the most recent lodge development on site looking to sell out this season. Our client is therefore seeking to assist in meeting this demand by proposing an additional 27 lodges in this scheme.

**Bilfinger GVA**

1.3 Bilfinger GVA is one of the UK’s top five property consultancies. With twelve offices covering the whole of the UK, it has the capability to provide the full range of property advisory services to the leisure business across the regions.

1.4 Retail, Hotels and Leisure is the specialist tourism and leisure advisory arm of Bilfinger GVA. Our specialist planning team has extensive experience of providing viability, regeneration and development consultancy, planning advice, applications, appeals and expert witness evidence at planning inquiries for development in the tourism and leisure sectors.

**Other Supporting Information**

1.5 The planning application is accompanied by the following documents:

- Site Location Plan;
- Existing and Proposed Site Layout Plans;
- Detailed landscaping scheme;
- Phase 1 Habitat Survey Report (Ecology Report);
2. **Site Description and Context**

**Site Location**

2.1 The site is located in the countryside 2 miles south of Gisburn on the A682, approximately midway between Skipton to the north and Burnley to the south. The closest settlements include Clitheroe (9.7 miles / 15.6 km to the south-west), Barnoldswick (4.8 miles / 7.7 km to the south east) and Skipton (12.9 miles / 20.8 km to the north-east).

2.2 The site has good road access from the A65 and A59 and the motorway network (including the M6, M65 and also the M60 route from the Manchester area). To the west is Blackburn and Preston; to the east is Bradford and Leeds. The Forest of Bowland AONB and Yorkshire Dales National Park are less than half and hour’s drive away. The road map below shows the location of the site in this context.
Site Context and Description

2.2 The park is accessed directly off the A682 and bounded to the west by that road. The surrounding land use is agriculture and there is another caravan park less than 2 miles away near Rimington on the other side of the A682. The application site is a field immediately adjacent the exiting caravan park, currently used as informal recreation for the park. The aerial photograph shows the site in this context.
2.3 There are a number of public rights of way in the vicinity of the site including a footpath immediately to the south and also crossing the top part of the application site. Fig. 3 below shows the public rights of way network.
2.4 The site is licensed for over 300 holiday static caravans with some privately owned and some hire fleet, including a new development of 33 timber-clad lodges. Facilities on site include a shop, pub/restaurant and children’s playground and multi-use games area. The local bus service stops at the park.
Planning History

2.3 Planning permission 3/2005/0289 was approved 26 July 2005 for the ‘proposed extension to operating period to allow for the use of the site for 10 and a half months each year running from 1 March to 15 January by modification of BO1318, BO1609, BO1806 and 3/99/0662/P (Re-submission of 3/2004/0287).

2.4 Planning permission 3/2006/0620/P was approved 15 September 2006 for the utilisation of a previously un-used area of Todber Caravan Park to accommodate 22no. timber clad twin units whilst maintaining the approved maximum of 306 units on the site.

2.5 Advertisement consent 3/2007/0072 was granted on 4 May 2007 for replacement entrance signs (non-illuminated)

2.6 Planning permission 3/2007/0377P was granted on 12 June 2007 for installation of lpg bulk storage tanks and additional water storage tank.

2.7 Planning permission 3/2009/0960/P was approved 18 December 2009 for the modification of condition 2 on planning consent 3/2006/0620 to read ‘the chalets shall be used for the purpose of holiday accommodation only and not as a permanent residence’. This permitted 12 month holiday use of the 22 timber clad twin units.

2.8 Planning permission 3/2010/0775 was approved 14 January 2011 for the utilisation of a previously unused area of Todber Caravan Park to accommodate 11 timber clad lodge units whilst maintaining the approved maximum of 306 on the site.

2.9 Planning permission 3/2011/0791 was approved 19 December 2011 for the variation of condition no.1 of planning consent 3/2005/0289P to allow plots N1 – N25 to be available for 12 months, only for the purpose of holiday lets and not as a permanent residence.

2.10 Planning permission 3/2013/0045 was approved on 27 February 2013 for demolition of existing agricultural buildings to provide indoor leisure complex incorporating swimming pool, sauna, steam room and Jacuzzi with café and display shop.

2.5 Planning permission 3/2013/1007 was granted on 12 December 2013 for removal of condition on previous permissions to allow a 12 month holiday season across the whole park.
3  Proposed Use

3.1  The proposed development is for the siting of 34 holiday lodges, extending the park to the south. The development will be accessed from the existing internal access road and the existing field access from the A682 will be closed off.

3.2  An attractive spacious layout is proposed with substantial planting both within the pitches and around the site boundaries. A portion of open space will be retained for informal recreation.

3.3  A hardstanding base and parking space alongside each caravan will be provided, as well as an internal access road within the new layout, as shown in the proposed layout drawing (Drawing No. 3579-250 D).

3.4  Details of the proposed landscaping are shown on submitted drawing ref. 15003-DD-PP-0-01 Planting Plan.

3.5  The external appearance of the caravans would be in sympathy with the surrounding landscape, comprising muted colours such as green/beige, or timber-clad with dark green/grey tiled pitched roofs.

3.6  It is intended that the lodges would operate with a 12 month holiday season in accordance with the rest of the holiday park.
4 Market Need and Economic Impact

4.1 Our client is experiencing high demand for holiday lodge accommodation on this site with the recent lodge development already close to selling out. The park is very popular with private owners looking for a quieter location away from the coastal fringe and is currently nearing capacity in terms of pitch occupancy.

4.2 The company owned hire fleet achieved 78% occupancy early in the season meaning many holidaymakers have to go elsewhere. Holiday bookings are up over 60% compared to the previous year.

Market need

4.3 The site is located within a 2 hour drive of a number of major urban conurbations. It is likely that the core market for the proposed holiday accommodation (in terms of private holiday home owners) will be from within such a catchment. Those renting accommodation for an annual holiday may travel from farther afield. The site is well connected to the motorway network so remains a viable option for those travelling from farther afield.
<table>
<thead>
<tr>
<th>Destination</th>
<th>Approximate distance (miles)</th>
<th>Approximate journey time by car</th>
</tr>
</thead>
<tbody>
<tr>
<td>Manchester</td>
<td>38</td>
<td>0hr 54</td>
</tr>
<tr>
<td>Liverpool</td>
<td>62</td>
<td>1hr 12</td>
</tr>
<tr>
<td>Sheffield</td>
<td>66</td>
<td>1hr 36</td>
</tr>
<tr>
<td>Middlesborough</td>
<td>85</td>
<td>1hr 52</td>
</tr>
<tr>
<td>Leeds</td>
<td>40</td>
<td>1hr 02</td>
</tr>
<tr>
<td>York</td>
<td>55</td>
<td>1hr 20</td>
</tr>
<tr>
<td>Chester</td>
<td>82</td>
<td>1hr 30</td>
</tr>
<tr>
<td>Stoke-on-Trent</td>
<td>60</td>
<td>1hr 10</td>
</tr>
</tbody>
</table>

Fig.4 – Distance to key towns and cities from Todber Valley Caravan Park (courtesy of AA)

4.4 In the early years of the last recession the British holiday market witnessed an upsurge in domestic holidays and Britons sought to reduce their holiday costs by holidaying at home (see fig. 5 below). This ‘staycation’ effect has led to a significant increase in UK expenditure on tourism (see fig. 6 below).
Fig 5 – increase in holiday trips by UK residents 2006 - 2013 - source: Visit England

Fig 6 – increase in tourism expenditure by UK residents 2006 - 2013 - source: Visit England
4.5 Although visitor numbers have receded from this 2009 peak, interest in domestic holidays has remained higher than the years before the recession as British holidaymakers have rediscovered the attractions of a holiday in Britain. In addition, as the country has come out of recession, holidaymakers are demanding and prepared to pay for higher quality accommodation.

4.6 The North West is one of the most popular regions amongst domestic staying visitors (according to most recent UK 2013 annual figs – see fig.5 below) generating one of the highest levels of tourism spend per region outside of London. This highlights the importance of the visitor economy in this region. This trend continues with the most recent 2014 quarterly update (Q3 – upto September 2014) showing for the 12 month period October 2013 - September 2014 that the North West region has the highest average spend per night (£70) outside of London (£113) with other regions ranging from £54 - £67 average spend per night.
4.7 The latest market summary (source – Bilfinger GVA Winter/Spring update 2015) confirms the confidence in the market and evidence of growth. Most larger trading parks have increased their profitability and caravan sales. Many smaller and medium-sized parks have also seen some recovery of sales. On holiday letting parks, whilst bookings in the early part of the 2014 season were affected by floods, most operators have reported to date an increase in occupancy during the summer months with good levels of late bookings, making 2014 a good trading year overall.
4.8 The UK Parks website (ukparks.com) provides the following information on holiday parks within the area providing lodges and static caravans.

<table>
<thead>
<tr>
<th>Park address</th>
<th>Distance from Todber</th>
<th>Lodges</th>
<th>Statics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ribble Valley View, Old Langho, BB6 8AW</td>
<td>15 miles</td>
<td>19</td>
<td>-</td>
</tr>
<tr>
<td>Ribblesdale Park, Mill Lane, Clitheroe, BB7 4LP</td>
<td>2 miles</td>
<td>61</td>
<td>-</td>
</tr>
<tr>
<td>Shirebourne Park, Edisford Road, Waddington, BB7 3LB</td>
<td>12 miles</td>
<td>2</td>
<td>15 owned; 2 for hire</td>
</tr>
<tr>
<td>Three Rivers , Eaves Hall Lane, West Bradford, BB7 2JG</td>
<td>10 miles</td>
<td>20</td>
<td>100 owned; 8 for hire</td>
</tr>
<tr>
<td>Todber Valley, Burnley Road, Gisburn, BB7 4J</td>
<td>-</td>
<td>35</td>
<td>209 owned; 7 for hire</td>
</tr>
<tr>
<td>Bridge Heywood, Dunkirk Farm, Read, BB12 7RR</td>
<td>14 miles</td>
<td>-</td>
<td>89 owned</td>
</tr>
<tr>
<td>Hackings Caravan Park, Potterord Farm, Billington, BB7 9HZ</td>
<td>14 miles</td>
<td>-</td>
<td>128 owned</td>
</tr>
<tr>
<td>Rimington Caravan Park, Rimington, Gisburn, BB7 4EE</td>
<td>1 mile</td>
<td>-</td>
<td>125 owned</td>
</tr>
</tbody>
</table>
4.9 On making enquiries to these individual parks, our research confirms there is a shortage of hire fleet available at peak holiday periods (with no holidays available for late booking during the Spring Bank Holiday) and only a limited number of holiday caravan pitches available for sale.

4.10 Looking at the Ribble Valley Council website there is only a limited number of additional holiday static/lodge pitches generated by planning permissions granted in the past two years. Relevant applications include 3/2015/0074 for creation of 21 touring vans on land at Petre Arms, Langho (not yet determined); 3/2014/0876 for siting static caravans at Three Rivers Caravan Park (not yet determined) – this is primarily for reorganization of the existing park, including possible relocation of residential units; 3/2014/0132 for 12 static caravans/lodges at Higher House; 3/2012/0910 for 15 new static caravans at Bridge Heywood Caravan Park. An application at Rimington Caravan Park (3/2013/0975) was for variation of condition to maximise use of the site and did not result in an increase of permitted caravan numbers overall. So there is no latent supply of additional static caravans/lodges likely to come forward to meet the anticipated demand.

4.11 If anticipating a reasonable sales rate of 10 holiday caravans per year then the proposed development of 27 static caravans at Todber Valley would be able to deliver a steady supply of new holiday caravan accommodation over the next 2-3 years, whilst also creating additional hire fleet opportunity for the market.
Economic impact

4.13 The proposed development of 27 lodges will be of significant benefit to the local economy though increased visitor spend. Evidence of the contribution holiday caravan pitches make to the local economy can be found in a report produced on behalf of the British Home and Holiday Parks Association (BH&HPA) specifically to look at the contribution made by holiday parks to the economy in terms of visitor spend and also spending by the park operators on goods and services in their local area. The report (“UK Holiday Parks Economic Summary- January 2012”) looked at the different levels of spend per park and per visitor for privately owned static holiday caravans, holiday caravans for let and touring caravans.

4.14 Table 2 of the report provides figures on the typical spending by the park operator and by the visitor per pitch. The typical combined spend per pitch is £2800 for touring pitch; £7525 per privately owned holiday static; £15,300 per rented holiday static. This would give a range of £203,175 to £413,100 spending in the local economy generated by 27 static caravan pitches. The applicant intends to have a mixture of privately owned and hire fleet as the market demands.

4.15 This report is an up-to-date study commissioned by BH&HPA which is the national trade organisation for the holiday and home park industry in the UK. The findings are based on extensive survey research with data collected from holiday park operators and holidaymakers. A copy of the report is provided in Appendix 1 to this Appeal Statement.

5 Visual Impact

5.1 A full Landscape and Visual Impact Assessment is submitted with the application which considers the impact of the proposed development on public views and makes recommendations for appropriate mitigation which have been incorporated into the detailed landscaping scheme. The proposed layout includes generous buffer spaces for additional landscape planting between the lodges and around the site boundaries.

5.2 The site is not visible from most public roads. There are some glimpsed views from the A682 where it passes the site but these are limited by existing hedgerows.
5.3 The proposal is an extension to an existing caravan park and will be heavily screened. As the planting matures there will be no appreciable increase in the size or change in the type of development in the local landscape. The landscape impact would be felt at the site its immediate setting not in the wider landscape. Further away from the site changes would be imperceptible.

5.4 Full details, including photographs, of the public viewpoints are included in the submitted LVIA statement. Impact on these public viewpoints is generally negligible or no change. Some slight adverse impact is recorded on closer range viewpoints but as the proposed planting matures this is judged to reduce to neutral.

5.4 In terms of mitigating the proposal, a combination of planting and earth mounding would be placed to the site boundaries to the south and west. The mounding would not be allowed near the roots of existing trees to be retained as it could compact the tree roots. The gaps in the existing hedgerow to the west should be reinforced with additional planting. Planting within the centre and eastern boundaries of the site will also visually break up the rooflines of the lodges in distant views.

5.5 The LVIA concludes that due to the moderate sensitivity of the landscape (the site is not within or adjacent a designated landscape) and the magnitude of change being negligible to no change (due to limited views and the screening effect of existing and proposed landscape planting) that the landscape impact of the development proposals is neutral.
6 Planning Policy Context and Considerations

6.1 This section of the appraisal identifies the local and national planning policy context of the site and in particular those policies which have a direct bearing / influence over the proposed change of use.

Local Policy Context

6.2 The Council’s Core Strategy 2008 – 2028: A Local Plan for Ribble Valley was adopted in December 2014. The former district-wide local plan no longer forms part of the statutory development plan for the Borough.

6.3 Key Statement EC3 on the Visitor Economy supports the proposal in principle stating that,

Proposals that contribute to and strengthen the visitor economy of Ribble Valley will be encouraged, including the creation of new accommodation and tourism facilities.

6.4 Paragraph 7.14 also states ‘a gap analysis is required in order to encourage new investment within hotel accommodation, self-catering, conference venues, eating out and visitor attractions’.

6.5 This emphasises that the Borough are looking to approve appropriate visitor accommodation developments that will help to stimulate economic growth and therefore improve the local economy. It is noted that investment in self-catering accommodation (which includes caravans) is to be encouraged.

6.6 Policy DMB3 deals with Recreation and Tourism Development and states that

Planning permission will be granted for development proposals that extend the range of tourism and visitor facilities in the Borough. This is subject to the following criteria being met:

i) The proposal must not conflict with other policies of this Plan;
ii) The proposal must be physically well related to an existing main settlement or village or to an existing group of buildings, except where the proposed facilities are required in conjunction with a particular countryside attraction and there are no suitable existing buildings or developed sited available;

iii) The development should not undermine the character, quality or visual amenities of the plan area by virtue of its scale, siting, materials or design;

iv) The proposals should be well related to the existing highway network. It should not generate additional traffic movements of a scale and type likely to cause undue problems or disturbance. Where possible the proposals should be well related to the public transport network.

v) The site should be large enough to accommodate the necessary car parking, service areas and appropriate landscaped areas; and

vi) The proposal must take into account any nature conservation impacts using suitable survey information and where possible seek to incorporate any important existing associations within the development. Failing this then adequate mitigation will be sought.

6.7 The principle of the development for additional holiday lodges is supported by Policy DMB3 as it will extend the range of tourism and visitor facilities in the Borough. We have demonstrated there is a high demand for high quality holiday lodge accommodation in this location which is not currently met by the existing available supply.

6.8 The application site is well related to the existing caravan park which has a number of buildings near the roadside, including a pub, and the new lodges will be seen in this context. The supporting text to Policy DMB3 notes that recreation and tourism development is often well suited to rural areas. Holiday parks of this nature require a rural location as that is their attraction to visitors.

6.9 Criteria 2 of the policy is therefore met and the location of the development also accords with Policy DM2 - Strategic Considerations as it is for small-scale tourism development appropriate to the rural area (criterion 4) and can also be considered
essential to the local economy (criterion1) due to the impact of increased visitor spending and job creation.

6.10 The detailed siting, scale and design of the proposal has been carefully considered to respect the character and appearance of the surrounding landscape. The submitted LVIA report and detailed landscaping proposal demonstrates that any adverse impact on the landscape is limited and can be suitably mitigated with landscape planting.

6.11 Impact on public viewpoints is generally negligible or no change. Some slight adverse impact is recorded on closer range viewpoints but as the proposed planting matures this is judged to reduce to neutral.

6.12 Criterion 3 of Policy DMB3 is therefore met and the scale and design of the proposal also accords with Policy DME2 - Landscape Protection as the proposals will not result in significant harm to important landscape features including hedgerows and trees. Existing hedgerow and boundary planting will be retained an additional planting proposed within the site boundaries.

6.13 The application site is well related to the highway network and has access to public transport with the local bus service stopping at the park entrance. The submitted Transport Statement demonstrates that the proposal is acceptable in terms of traffic generation and highways impact.

6.14 Existing visibility splays meet the desirable minimum standards and there is no record of personal injury accidents associated with the site access. Trip generation associated with holiday parks is low. Traffic surveys carried out over Bank Holiday weekend indicate that the development could generate an additional 3-4 two-way movements in peak hours. This will have minimal impact on the safety and convenience of road users.

6.15 Notwithstanding this the applicant proposes a financial contribution towards traffic calming measures to reduce speeds along this stretch of the A682 in the interests of all road users.

6.16 Criterion 4 of Policy DMB3 is therefore met and the development proposals also accord with the requirements of Policy DMG3 - Transport and Mobility.
6.15 As shown on the submitted drawings, the application site is large enough to accommodate the required car parking and access areas, as well as incorporating additional landscaping. Criterion 5 of Policy DMB3 is therefore met.

6.16 An Ecology Report has been prepared and submitted with this application. This confirms that there is no adverse impact on protected species or priority habitats. The reed bed on site is a redundant sewage filtration bed which is now drying out following installation of a new waste water treatment plant on the park. Development of the site would be timed to avoid the main bird breeding season. Biodiversity of the site will be enhanced through the planting of native species within the landscaping installation of bird and bat boxes around the site. Criterion 6 of Policy DMB3 is therefore met and the proposal also accords with the requirements of Policy DME 3 - site and species protection and conservation.

6.17 The proposed lodges are designed to a high standard in terms of visual appearance and sustainability measures. The external finish is Canexel which is a sustainable product made from compressed wood chip and resin. It has the appearance of timber but is more durable and can finished in a range of muted colours. Other features of the caravans include double glazing and thermal cavity insulation to minimise heat loss and so reduce energy consumption; low level lighting and energy saving bulbs to reduce light pollution; all radiators fitted with TRVs; compression taps and showers to reduce water consumption. There is an option for rainwater storage collection tanks to provide recycled water for car washing, window cleaning and watering etc. The development proposal accords with the general criteria of Policy DMG1 - General Considerations in this regard.
National Policy Context

National Planning Policy Framework (27 March 2012)

6.18 The NPPF sets out the Government’s economic, environmental and social planning policies for England. Taken together, these policies articulate the Government’s vision of achieving sustainable development, which should be interpreted and applied locally to meet local aspirations.

6.19 Paragraph 14 states that

At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

6.20 The proposal will assist in generating economic benefits throughout the local economy through the employment of local staff, general maintenance and cleaning, construction of the site etc. This coupled with the increased spend from visitors to the park will help to generate economic growth within the local economy.
6.21 In order to deliver sustainable development one of the key objectives is to build a strong and competitive economy. Paragraph 18 states

The Government is committed to securing economic growth in order to create jobs and prosperity, building on the country’s inherent strengths, and to meet the twin challenges of global competition and of a low carbon future.

6.22 Paragraph 19 states that ‘significant weight should be placed on the need to support economic growth through the planning system’.

6.23 Paragraph 20 states ‘to achieve economic growth local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st Century’.

6.24 Paragraph 21 states that ‘policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances’.

6.25 Objective 3 is to support a prosperous rural economy in order to create jobs and prosperity by taking a positive approach to sustainable new development. Paragraph 28 states that plans should:

...support sustainable rural tourism and leisure development that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres.

6.26 Objective 4 deals with promoting sustainable transport and paragraph 29 states

The transport system needs to be balanced in favour of sustainable transport mode, giving people a real choice about how they travel.

6.27 It should be noted that the paragraph goes on to state ‘the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas’.
In terms of economic role, the proposal will enhance the quality of visitor accommodation in the borough, which is likely to attract higher spending visitors which should generate additional income in the local economy through increased visitor spending in local shops and services. Further jobs would be created through the preparation of new pitches (local contractors) and general maintenance of the site (gardener and cleaners). In social terms, this spending will help to retain important social facilities such as local shops and services, including the local bus service. In environmental terms, the lodges are designed be sympathetic to their rural setting and also to incorporate a number of sustainable features. It has been demonstrated that the development will not result in any significant harm to the landscape or protected species/ecological features on site.

**National Planning Practice Guidance (NPPG, March 2014)**

Intended as additional guidance to assist in interpreting the NPPF, the new National Planning Practice Guidance provides further comment on consideration of tourism proposals in the countryside, replacing the guidance previously found in the Good Practice Guide on Planning for Tourism (2006).

The Guidance states when planning for tourism, local planning authorities should:

- Consider the specific needs of the tourist industry, including particular locational or operational requirement;
- Examine the broader social, economic and environmental impacts of tourism;
- Analyse the opportunities for tourism to support local services, vibrancy and enhance the built environment.

The Guidance carries on to state that further guidance on tourism can be found on the Visit England website.

This further guidance requires that ‘Local Plan’s approach to tourism will need to be based upon a robust understanding of business needs within the tourism industry including a quantitative and qualitative assessment of future tourist accommodation, including hotels and holiday parks’.

It is evident that tourism and in particular holiday parks play an important role for the local economy. We have demonstrated there is a high demand for holiday lodge accommodation in this area which is not being met by the existing available supply.
6.34 The guidance carries on to state

In rural areas the market for a rural tourism facility may often be in attractive countryside locations designated to protect their landscape beauty which may be distant from main service settlements.

In order to be commercially successful, tourism sites must be accessible to their target market for visitors. New tourism developments should, where reasonable, facilitate the use of sustainable modes of transport.

6.35 The guidance offers support for rural based schemes including those offering holiday accommodation such as touring caravans, static caravans or holiday lodges. The proposal for additional holiday lodges is acceptable as we have demonstrated the sustainability of the location, with good access to public transport and local amenity stores, shops and pubs. The economic benefits of the proposal are significant in terms of increased visitor spend and job creation.

6.36 Taking the detailed advice in the Practice Guidance along with the policies in the NPPF it is evident that the site at Todber Valley Holiday Park can be considered a suitable and sustainable location for tourism development in the countryside.
7 Summary and justification for proposal

7.18 We consider that our clients' proposal for an additional 27 holiday lodges is acceptable and in accordance with relevant local and national planning policy for the following reasons:

- There is a need for additional holiday lodge accommodation in the area which is not being met by existing available supply. The development will deliver significant economic benefit to the area retaining overnight visitor spend within the borough.

- The principle of holiday lodge accommodation in this location is supported in principle by Policies EC3, DMB3 and DM2, as well as the NPPF.

- The development as designed will not result in significant harm to the character and appearance of the countryside and any visual impact identified can be suitably mitigated with the proposed landscape screening. The proposal therefore accords with policies DMB3 and DME2.

- The proposed development is acceptable in terms of traffic generation and highways impact, with adequate provision for parking and servicing. The proposal therefore accords with Policies DMB3 and DMG3.

- The development will not result in any harm to protected species or priority habitats and the scheme includes measures to enhance the biodiversity of the site. The proposal therefore accords with Policies DMB3 and DME3.

- The site is in a suitable and sustainable location for a rural holiday park and will deliver significant economic benefits to the area. As there is no evidence of significant or demonstrable harm arising from the development, it should be approved as sustainable economic development in accordance with the NPPF and NPPG.