1.1 These comments are made on behalf of Hoburne Ltd in response to the Environment, Food and Rural Affairs Committee inquiry into the role of tourism in supporting rural growth in England.

1.2 Established in 1912, Hoburne Ltd is a family run business that own and operate a portfolio of 7 holiday parks across the south of England. The businesses' contribution to the local tourism industry has been recognised by several awards in recent years. In July 2015, Hoburne Holiday Parks won the coveted South West Family Business of the Year award and came runner up in the Hotel and Leisure Family Business category. The awards, run by Family Business United (FBU), saw 98 family firms from across the UK represented. In the same year, five of Hoburne's seven parks were awarded TripAdvisor Certificates of Excellence, given to the top 10% of establishments worldwide that consistently achieve outstanding reviews on the site. Individual parks have also achieved awards in their localities. In 2013 Hoburne Bashley was named the top Caravan Holiday Park and Holiday Village of the Year at the beautiful awards for excellence. In the previous year, Hoburne Naish was awarded the silver prize for the same award. Hoburne Park was awarded silver in the Dorset Tourism Awards in both 2014 and 2015 and Devon Bay was awarded silver at the South Devon Tourism and Hospitality awards in 2015.

1.3 Building on this reputation, Hoburne are currently putting significant investment into their holiday parks, upgrading their entertainment and facility buildings and improving the quality of existing holiday accommodation on parks by shifting away from regimented layouts and communal parking areas to more spacious layouts with on-pitch parking as well as replacing out-dated, and undesirable holiday chalets built between the 1960s and 1980s with up-to-date larger modern static holiday caravans.

1.4 Hoburne have recent experience of a number of different rural planning authorities, including one National Park Authority, as they are currently progressing their redevelopment proposals through the planning system. This has informed much of their representations, combined with their industry knowledge of other planning authority approaches towards issues which are of relevance to Hoburne projects. What is particularly apparent is that whilst the NPPF and NPPG support sustainable rural tourism, this principle is not interpreted consistently across different rural planning authorities in their emerging plans. National Parks in particular offer little flexibility to support proposals that would be of benefit to their economy whilst having no significant adverse impact.

Section 2 – Planning Restrictions

2.1 The committee has posed two questions in relation to planning:-
Planning and regulation: What, if any, change are needed to planning and other regulations covering rural areas of special character, such as National Parks, to encourage sustainable tourism?

Local environment and character: How can national and local policies get the right balance between growing tourism and enhancing the local environment and character?

2.2 These two questions are fairly well inter-related, so we deal with them together below, with reference to individual parks and local planning authorities to provide examples of the issues raised and make the following suggestions for changes to the planning system:

Local planning authorities should be required to plan positively for replacement of older style holiday accommodation

2.3 The Isle of Sheppey has a significant number of holiday parks with many in need of upgrading. Swale Council’s adopted and proposed Local Plans carry extremely negative planning policies that prevent the expansion of any holiday park on the island either in terms of the area it covers or the number of units of accommodation. The net result has been continued underinvestment in the island’s parks for several decades. As a result of this underinvestment, the parks have become less popular with holiday-makers who are able to choose better sites around the country.

2.4 What is the point of replacing out-dated 1960’s chalets with larger modern caravans if that will bring you half as much accommodation as the council will not allow you to expand onto the adjoining land to recover those numbers and therefore you will end up with half as many customers.? What business plan could you put together to persuade the bank to finance the re-layout of the park in this way?

2.5 Many of Hoburne’s parks include areas of older chalets which are due to be replaced, or the replacement of touring pitches with statics. It is frustrating (time consuming and costly) having to demonstrate through extensive flood risk, drainage and ecology reports, that siting of static caravans in their place would be acceptable. Given these schemes will usually involve a reduction in pitch numbers overall, and are simply replacing one type of self-catering holiday accommodation with another (so the site is already occupied, with drainage connections and external lighting already in place) it should be evident there will be no greater impact on local wildlife, services and infrastructure, or on visual amenity.

Local planning authorities should be required to plan positively for development of new and extended holiday parks and provide evidence of alleged harm to the landscape
2.6 Naturally the visual impact of such development on the special qualities of protected landscapes such as National Park /AONB is an important material consideration, as well as issues such as direct impact and further pressure from visitors on its important environmental qualities.

2.7 All of Hoburne’s holiday parks are in attractive, rural locations and they have experience of working with a number of different local planning authorities. Hoburne Bashley is located within the New Forest National Park where policy seems unduly restrictive towards their proposals for extension and improvement.

2.8 Whilst general policy is supportive of tourism development and retention of existing visitor accommodation, the policy dealing specifically with holiday parks states that extensions will only be permitted to enable the removal of pitches from sensitive areas by the relocation of part of a site to a less sensitive area adjoining an existing site. In addition schemes must demonstrate there would be overall environmental benefits; there must be no increase in the overall site area or capacity; and the remaining area would be fully restored to an appropriate New Forest landscape, and any existing use rights are relinquished.

2.9 The Lake District National Park will allow some increase in caravan numbers but only within existing site boundaries; the Yorkshire Dales National Park will allow some modest extension (where environmental enhancement can be demonstrated) but no increase in numbers.

2.10 The thrust of all these policies means there is no scope for proposals to be considered on their own merits. If a small-scale caravan site of, say, 15 – 20 pitches could be accommodated within the landscape and be completely screened from view then at present it remains contrary to policy and is refused. In other cases it may be perfectly possible to develop a small site extension, or even increase the permitted caravan numbers through infill development within the existing approved boundary, without causing any visual harm or other adverse effects and yet such a scheme would be refused under policy on the grounds it did not result in significant environmental or visual enhancements as part of a comprehensive re-modelling scheme. This policy approach particularly disadvantages sites which are already well-screened which seems perverse in that a site that is totally screened from view and where additional pitches would have no visual impact whatsoever, would be refused additional pitches simply on the principle of the wording of this policy.

2.11 The ethos of this policy approach seems to be that the National Park authorities do not wish to see holiday caravan development in spite of the economic benefits, rather than welcoming the economic benefits and seeking to support appropriate development in suitable locations considering each case on its own merits.
2.12 We are pleased to see amendments are being proposed in some emerging Local Plan policies (e.g. both Yorkshire Dales National Park Authority and Scarborough Borough Council (who had similarly restrictive policies) are now looking to support modest extensions where the site is already well screened.

2.13 This more flexible approach allowing proposals to be considered on their merits should be encouraged across all local planning authorities and policies maintaining this restrictive approach should be dismissed as unsound at Local Plan examination stage.

2.14 Hoburne Blue Anchor is in West Somerset District Council where touring caravans are supported either as new sites or extensions but static caravans are again restricted to extensions only being permitted where the proposal is part of a comprehensive plan for upgrading. Emerging policy is more broadly supportive of tourism development with specific mention of caravan parks. Whilst at first this seems more flexible, it introduces a requirement to demonstrate that location is essential to the business and the proposal cannot be located elsewhere.

2.15 Hoburne Doublebois is in Cornwall Council. Current adopted policy will not support new sites and again extensions will only be permitted where they are to facilitate lower density layout and increased landscaping. So again, no opportunity for acceptable schemes to be supported in principle where they involve an increase in numbers. Whilst enhanced layout and reduced visual impact is to be welcomed, particularly in sensitive landscape areas, these policies are preventing economic growth as they will only support schemes which reduce or maintain existing numbers. Such schemes will not generate additional visitor spending or create new jobs.

2.16 Emerging policy is said to be more supportive by lack of specific mention of caravan parks but this lack of mention is not always helpful, particularly when reverting to the NPPF provides little additional detail, indeed no mention of holiday parks. This means that any inherent resistance of planners towards holiday caravan parks based on previous planning policies tends to carry through as there is no clear criteria in new planning policy to consider the principle of holiday park developments in the countryside.

2.17 Hoburne’s own experience of developing within other rural planning authorities has been much more positive. Hoburne Devon Bay is in Torbay Council and Hoburne Cotswold in Cotswold District Council. These authorities recognise the needs of holiday park operators and the benefit to their own tourism economy of allowing improvements to take place. There has been no resistance to proposals for
changing touring pitches to statics; replacing chalets with new static caravans and lodges; or with increasing the number of caravans within the park where space allows.

2.18 The Cotswolds is very much a “honeypot” tourist area facing similar pressures to that of the National Parks yet planning applications where there is genuinely no evidence of harm have been allowed in a very straightforward manner.

2.19 Hoburne Park is in Christchurch Borough Council. By comparison, their policy states that proposals which seek to increase the provision of holiday accommodation in Christchurch will generally be supported. Such proposals are recognised as benefitting the local economy and Christchurch as a tourism centre. The change of use or redevelopment of holiday accommodation to other uses will also be resisted.

2.20 Hoburne Naish is in New Forest District Council. Here policy will support extensions and improvements to holiday parks in the countryside provided they have no greater impact than the existing park.

2.21 If other rural planning authorities, including National Parks, could adopt this more positive and flexible approach then not only would park operators experience less frustration with the planning process but the local economies would benefit from the additional revenue from tourism and avoid the pitfall of many National Parks where it is difficult to obtain overnight accommodation within them and therefore they become the preserve of local residents and day visitors.

Local planning authorities should not impose additional restrictions on holiday seasons of how accommodation is managed and let

2.22 It has long been established that use of standard holiday occupancy conditions preventing use of the accommodation as a person’s sole or main residence and requiring the operator to keep a register of main home addresses is the appropriate way to control occupancy and that additional controls are unnecessary and unduly burdensome on applicants. Local planning authorities should be discouraged from imposing additional controls and policies proposing to do this should be dismissed as unsound at Local Plan examination stage.

2.23 Whilst Hoburne has so far not experienced any difficulty in extending holiday seasons on their parks, some local planning authorities still seek to limit the length of season with no justification, simply due to concerns over residential use. This prevents operators being able to develop the high quality holiday accommodation that policy purports to support.

2.24 A number of local planning authorities seek to control holiday occupancy by limiting it to short stay only, for example imposing a maximum stay of 28 days per calendar year to
any individual or group (Yorkshire Dales National Park Authority), or requiring the accommodation to be made available for letting for a minimum of 140 days each year and no let to exceed 31 days (Ryedale District Council).

2.25 This does not fit the business model of many holiday parks as it prevents the caravans being sold as private holiday homes with owners free to come and go as they choose.

Permitted development rights should be extended to cover more ancillary developments on holiday parks

2.26 There are a number of fairly routine developments which operators undertake on their parks which rarely face any objection yet due to delays in the planning system it can take an unnecessarily long time for applications to be approved. This causes problems for operators in programming their works to ensure that facilities are ready in time for the main season and that disruption on site is avoid during this period. We consider the following types of development could reasonably be carried out as permitted development, or at least through a prior notification procedure whereby local planning authorities have 28 days to identify any reason why full planning permission should be required.

2.27 External alterations and modest extension of central facilities buildings within certain limits and parameters, i.e. single storey, no more than 25% increase in gross floorspace. Many parks are seeking to update their central facilities to keep in touch with changing trends. Minor works such as insertion of additional doors/windows; conservatory extensions, enclosure of pools etc. have no impact beyond the holiday park itself and could be dealt with much more simply.

2.28 Provision of play areas within certain limits and parameters, i.e. up to five pieces of equipment no more than 3m high, per park. It is reasonable to assume that a holiday park operator will provide play equipment. Whilst larger scale facilities with outdoor lighting may require more rigorous assessment, standard play equipment is rarely contentious in the centre of a holiday park so allowing this as permitted development would save both operators and local planning authorities a lot of time in administration. A prior notification system would allow for any significant issues such as impact on trees to be identified and assessed beforehand.

2.29 Replacement of holiday chalets with up to the same number of holiday caravans within the same application area as originally permitted for holiday chalets. As noted in point 1), many of operators have an ongoing programme to buy in and replace out dated chalets built between the 1960s and 1980s with new static caravans and lodges. As full planning permission is needed to change from built accommodation to use of land for siting caravans, all manner of supporting documents and subsequent delays with planning applications make a simple replacement of one form of holiday accommodation for another, unnecessarily complicated and time consuming.
Government guidance on planning for tourism should be incorporated into the
NPPG

2.30 Hoburne feel that tourism is not given enough consideration and weight in the
planning system. As noted in point 2), policies are still unduly restrictive and
emerging policy, whilst said to be more flexible, rarely makes specific mention of
holiday caravan parks and circumstances where development can be acceptable.

2.31 Formerly, the Good Practice Guide on Planning for Tourism, helped operators in
bring forward applications to develop, improve and expand holiday parks in rural
areas. However, this guidance was removed with the introduction of national
Planning Practice Guidance which says nothing about planning for tourism in
rural areas or about planning for holiday parks themselves. The only reference to
tourism is 'hidden' within the section on 'Ensuring the vitality of town centres'
and this does not deal with planning for tourism or holiday parks in rural areas. It
does refer to additional guidance on the Visit England website and this is much
more useful and direct with regard to planning for tourism, including holiday
parks, in rural areas; however, the guidance is extremely difficult to find on the
website and very easily missed (it is at the bottom of a tab that would not show
up on most computer screens). We recommend this simple and concise guidance
of no more than a page is incorporated into the national Planning Practice
Guidance so that it is properly used by planning decision makers.

2.32 We hope that our representations will be taken into account. Please contact us if
we can provide additional information.

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