

Design & Access / Planning Statement

V3.6

Proposed Small Scale Exclusive Eco Holiday Park with Fishing Lake

at

Little Densole Farm

Densole

Folkestone

Kent CT18 7BJ



Lambe Planning & Design
Consultants for Planning, Design and Landscape

Applicant:-

Mr and Mrs David Westgarth, The Farmhouse, Little Densole Farm, Densole, Folkestone, Kent CT18 7BJ

Proposal Description :-**Proposed Small Scale Exclusive Holiday Park with Fishing Lake Development on Land adjacent to Little Densole Farm.**

This *Design & Access / Planning Statement* covers the following aspects :- Context, Involvement, Design, Layout, Scale, Landscape, Landscaping, Appearance, Access, Use, Amount, Tourism and Benefits to the Local Economy - and supporting information regarding, Local Development Plan, Central Government and Tourist Board Policies and Guidance etc. This Statement has been prepared and set out in accordance with guidance relating to Design and Access Statements.

1.00. Introduction and background to the proposals

1.01. The site comprises of approximately 13.5 acres of Agricultural Land and lies approximately 265 metres to the east of the village of Densole. Whilst the site lies within the North Downs AONB and the local designation as a Special Landscape Area, the landscape character of the area is influenced by the close proximity of the adjacent settlement & housing development of Densole.

1.02. The site falls to the south-east of the main A260 Canterbury Road and is bordered by agricultural land on the west, and southern boundaries. The northern and eastern boundary comprises of a large block of mature woodland – Reinden Wood.

1.03. The site is therefore exceptionally well screened with virtually no views into the site from without – with the additional planting proposed, this would ensure that there would be no detrimental impact upon visual amenity or the AONB.

1.04. There are no public rights of way across the application site. There are two public rights of way in the vicinity, one lies to the north-west of the site approximately 210 metres from the most northern boundary, the other lies within Reinden Wood. The topography and existing mature hedgerow screening, and additional woodland planting would ensure that the proposals would be unseen from any public rights of way.

1.05. Access to the site is readily achievable from the main motorway network via the M20 and the rest of Europe via the Channel Tunnel and the Port of Dover.

1.06. The site is related to other development in the immediate vicinity and has the benefit of being able to provide a suitable facility with almost immediate access to the AONB, without having any detrimental impact upon the more sensitive areas within the AONB if such a proposal were to be sited elsewhere within it.

1.07. The scheme would create employment and contribute a significant amount to the local rural economy which is heavily dependent on the tourist trade – and would help to support other local attractions, public houses, restaurants and convenience stores in the locality.

1.08. The area is reliant on the Tourism Industry, and there is a need for exclusive, upmarket high quality accommodation – these factors are encouraged within the local development plans, Tourist Board Policy, and Regional & Central Government Policy. Such accommodation needs to be provided in the region, yet there is an extreme shortage of sites where such

accommodation and development can take place – particularly within the AONB due to the stringent planning policies – which were prepared to protect the more vulnerable areas within the AONB.

1.09. This site has extremely good access and all the benefits of being able to provide such a facility, in a totally screened environment, without any of the detrimental impacts that could occur should such a facility be located within the more sensitive areas of the AONB.

1.10. In summary, there is an acknowledged need for additional high quality tourist accommodation, and such proposals need to be accommodated in the area, and located in reasonable proximity to the more sensitive areas of the AONB - but without impacting adversely upon it. This site meets these criteria.

Figure 1. Site Location X in relation to the wider area.

Image courtesy of Ordnance Survey & the Microsoft Corporation



Figure 2. Site Location X in relation to the immediate surrounding area CT18 7BJ



Figure 3. The Application Site is identified below outlined in red. The close proximity of the Settlement of Densole and the surrounding woodland which together with the additional landscaping proposed would ensure a totally screened site with no detrimental impact upon visual amenity.



Image courtesy of Microsoft Corporation and Getmapping

1.11. A structured site selection process has been adopted for the choice of a site appropriate for the creation of an upmarket and exclusive Small Scale 5* Holiday Development. This will enable the proposed Holiday Park to meet demand and evolve into a modern upmarket and exclusive Holiday Park – all as advocated by current Development Plan Policy.

1.12. The site selection process covered many elements which have been carefully considered to ensure that the applicant had adopted the correct selection of an appropriate site.

The main elements being :-

- 1).** The Holiday Park location had to be visually unobtrusive, with good road access, centrally located and in an area where there was demand for such a holiday facility.
- 2).** The potential development site was particularly considered in relation to the locality and also the extensive screening which the site offered, and which could be supplemented with additional planting. Thus avoiding any negative visual impact upon the area.
- 3).** The chosen site had to be appropriate to the local area, and in close proximity to the AONB and other Attractions and Facilities.

4). and not impact adversely upon the area or neighbouring properties.

5). Due to the extensive existing mature woodland surrounding the site, undulating topography and supplementation with additional planting, the site of the proposals would be unseen from without. Thus affording total seclusion and ensuring that the Lodges in muted environmental colours would blend seamlessly and fully into the natural environment.

6). The site had to be outside of any designated flood plain / flood zone as holiday parks are classified as more vulnerable development.

7). The South Downs AONB economy is reliant upon the tourism industry and the chosen location for this proposal will diversity and build upon the standard of existing tourism accommodation and product offered. This will lengthen the tourism season into the shoulder months and create year round employment which will also support and bolster existing tourism enterprises in the area including, tourism attractions, shops, Inns, restaurants and café's etc.

1.13. The proposals are solely related to the creation of an upmarket and exclusive tourism attraction and are exactly in line with Central Government Policies, Tourist Board Policies and Policies contained within all the Local Development Plans. These directly encourage the creation of such high quality facilities and accommodation.

1.14. The high quality Holiday Units and Tourism Product proposed would significantly help raise the standards of accommodation and attraction offered in the region. The implications on continued and expanded local employment as well as the impact on spends within the local economy deserve significant consideration.

1.15. Schemes of this nature encourage tourism usage in the "off-season" shoulder months - Current Government and Tourist Board Policies being to encourage tourism in the shoulder months - to not only spread the demand and impact on infrastructure but also to get away from the in-continuity of seasonal jobs and income to the tourism market. This ultimately results in the creation of quality year round jobs.

1.16. There is a very strong local and national trend towards more upmarket holidays, especially for more spacious and better equipped Holiday Lodges. Holidaymaker's demands and aspirations have risen rapidly over the last 20 years. The applicant wishes to attract these holidaymakers with higher disposable incomes who appreciate the qualities of the area.

1.17. A report prepared by Tourism Solutions - Self catering Shortage Study - advised that "Trends in product development have pointed towards the development of higher quality units; people have increasingly experienced quality self-catering apartments/villas abroad and living standards generally have risen in the UK over the past 10 years. People continue to expect - and demand - quality that is at least as good as their own homes, and preferably better".

1.18. The Lodges would be constructed from timber and stained in environmental colours to blend into the natural environment – palette of colours to be agreed with LPA.

2.00. Amount (and type of Development)

2.01. The proposals are for an exclusive 5 star scheme, and are related to the demand identified for an exclusive facility of this nature in this location.

The elements to the proposal comprise :-

- 12 no. high specification Holiday Lodges
- combined Amenity & Reception Block
- the creation of a purpose built Fishing lake
- Tennis Courts, Putting Green and Children's Adventure Play Area
- significant supplementary landscaping and planting in broadly indigenous species of trees and shrubs

2.02. The "Angling Facility" would utilise the new lake on site. Demand for Angling is proven, it is our 6th biggest and fastest growing sport, and generates £3.5bn and employs 37,000 people. The recreation / amenity area would be located immediately adjacent to the Reception and Amenity Building enabling supervision and control of these facilities.

2.03. The area for the proposals is exceptionally well screened from any properties in the area, and would be totally unseen from without due to the nature of the proposals and the sites location adjacent to mature woodland. The opportunity for internal landscaping in indigenous species of trees and shrubs would create wildlife corridors & habitats around the site

2.04. The Lodges will be in muted environmental colours and fully landscaped to ensure that they blend seamlessly into the natural environment. Please see the presentation plan and drawings prepared by Paul Westrup Architectural Illustration and Design which accompanies the Planning Application.

3.00. Economic Contributions and Impact on The local Economy

3.01. Rural economies are heavily dependent on the tourist trade, which due to the nature of much of the accommodation and facilities offered is subject to significant seasonal variations. This has historically led to the in-continuity of seasonal jobs, the closing of facilities and attractions throughout the winter months, staff being laid off, and the migration of younger workers in search of permanent employment.

3.02. This scheme is a 5 star Holiday Development and incorporates elements which will boost demand for a 12 month season, and provide facilities of a quality currently unavailable in the area. Its location giving immediate access to the highway network and motorway network will ensure year round demand. The scheme will create employment and contribute a significant amount to the local rural economy, which will in turn support other local attractions, public houses, restaurants and convenience stores in the locality.

3.03. Recent recognised Statistics demonstrate that the Annual Economic Contribution per Holiday Lodge is £25,708 per unit into the local economy per annum for a 30 Week Season. *

3.04. This scheme therefore equates to a total of approximately £308,496 into the local economy on an annual basis for only a 30 week Season. A 12 month season would be significantly more. In addition to this statistics demonstrate that every two units accounts for one tourism job.*

*Source - Page 37 and 38 of Issue 147 of the BH&HPA Journal Jan / Feb 2011 (The British Holiday and Home Parks Association) – Regarding Research into Holiday Parks Economic Contribution into the Local Economy and a Study into impacts on Indirect Employment.

3.05. Employment Figure Calculations based upon a 52 week season demonstrate that this scheme would create **11 Full Time Equivalent Jobs** comprising of 6 Full Time Jobs & 10 Part Time Jobs = a Full Time Equivalent of 11 Jobs. Please see Appendix 2.

Figures 4 & 5. concept sketches illustrating the typical design, style and appearance of the proposed Lodges which can be stained in environmental colours to blend into the natural environment.



Figure 5.



Figure 6. concept sketches illustrating the typical design, style and appearance of the proposed Lodges which can be stained in environmental colours to blend into the natural environment.



Figure 7. Site Layout Plan



Figure 8. sketch impression illustrating the typical design, style and appearance of a Lodge which can be stained in environmental colours to blend into the natural environment.



Lodge 09 set within wooded enclosure

Figure 9. sketch impression illustrating the typical design, style and appearance of the proposed Lodge layout in a low density informal layout in a lake side setting.



Figure 10. Concept examples of the proposed Lodges illustrating the design, style and appearance of the proposed Lodges which can be stained in environmental colours to blend into the natural environment.





4.00. Area of the Proposals and Visual Impact

4.01. The proposed holiday Park layout is of a very low density with the units located informally with significant belts of new landscaping and planting in indigenous species of trees and shrubs. These will in turn create wildlife corridors around the site. The essence of the scheme being to create an extremely exclusive 5 star facility - totally unlike any other Holiday or leisure product currently being offered in the region or in the area or the North Downs AONB. Please see separate accompanying document for Visual Impact Assessment.

4.02. Due to AONB's being predominantly holiday areas, many other Holiday Parks are also located successfully within them, without having any detrimental impact upon them. Below are examples of other Holiday Lodge Parks within AONB's :

www.coastallodges.co.uk Coastal Lodges, Gara Mill, South Devon AONB

www.crowhurstpark.co.uk Crowhurst Park Holiday Village Telham Lane, Battle. Sussex AONB

www.bluewoodlodges.com Bluewood Lodges, Kingham, Oxfordshire. Cotswolds AONB

www.parkdeanholidays.co.uk West Bay Holiday Park, Bridport, Dorset and Ruda Holiday Park, Devon.

www.lakeviewmanor.co.uk Lakeview Manor Lodges, Dunkeswell, Honiton, Devon.

www.blackhalllodges.co.uk Black Hall Lodges, Llanfair Waterdine, Knighton, Powys. Shropshire Hills AONB

www.otterfalls.co.uk Otter Falls, Upottery, Devon

www.highlandsendholidaypark.co.uk Highlands End Holiday Park, West Dorset.

www.parmontleylodges.co.uk Parmontley Hall Country Lodges, Whitfield, Hexham. North Pennines AONB

www.woodovis.com Woodovis Park, Woodovis House, Gulworthy, Tavistock. Tamar Valley AONB

www.nottermill.co.uk Notter Mill Country Park, Notter Bridge, Saltash, Cornwall.

5.00. Pre Application Consultations and Community Involvement

5.01. A detailed written pre-application enquiry, followed by subsequent meetings and presentations have been undertaken with senior officers Mr Andy Jarrett (Head of Development Services), and Mr Paul Howson (Senior Planning Officer) from Shepway District Council Development Services and Regeneration & Planning Departments. Specific advice regarding the scheme was given – this scheme takes into full account all the observations, advice and input received from Shepway DC.

6.00. Additional documents & reports

6.01. Reports and documents which have been undertaken and accompany the application as supporting information comprise :-

- Visual Impact Assessment
- Business Plan
- Demand Statement
- Traffic Survey
- Transport Statement
- Ecological Assessment / Habitat Survey
- 1:1250 scale presentation layout drawing
- Block Plans and Elevational Drawings for Lodges, Reception, Bike Store & Mower Store
- Design and Access Statement / Planning Statement
- Location Plan
- Landscape Plan
- Information Flyer for the Eco Holiday Park

6.02. The findings of the Ecological Assessment / Habitat Survey :-

evaluates the site as having a low value, and concludes that sufficient consideration has been given to the potential presence of protected species, and confirms that there are no vulnerable or protected species at risk from these proposals.

6.03. The Visual Impact Assessment advises :-

"the landscape planting and management of trees and hedgerows will enhance the landscape character of the site and its surroundings within the East Kent Downs, strengthening its capacity to accommodate change and enhancing its landscape structure.

The mitigation planting and management will mean that the new Holiday Park with fishing lake will have negligible to slight positive landscape effects"

6.04. The Transport Statement finds that :-

"The traffic generation of the scheme is likely to be very light and fall outside the general existing highway network peak hour periods.

3.3 The existing access provides visibility commensurate with the recorded speed of traffic and could easily accommodate the proposal.

3.4 In accordance with NPPF there are no highway reasons why such a proposal could not be granted planning permission".

6.05. The Demand Statement demonstrates that there is Demand for this development in this location. The Business Plan and Financial Forecasts confirm that even with modest levels of occupancy and sales, the proposed Holiday Lodge Development will generate a substantial and viable profit.

7.00. Accessibility / Access and Movement To and From the Development

7.01. The site lies to the east of the main A260 Canterbury road. It has the benefit of an existing highway access with good Visibility Splays on a clear stretch of road. The location gives direct access to local bus routes and also enables ready access via the highway network to all the main conurbations and attractions in the area.

7.02. The location enables convenient and immediate access to the highway network and the main motorway networks which in turn give very acceptable travel times and accessibility to the majority of the major conurbations in Britain and Europe. The site is also located in close proximity to the Public Footpath networks.

Figure 12. photograph below taken looking north up the A260 illustrating the existing access to the site on the RHS and the clear visibility splays looking towards Swingfield.



Figure 13. photograph below taken looking south down the A260 illustrating the existing access to the site on the LHS and the clear visibility splays looking into the village of Densole.



Figure 14. photograph below taken looking east illustrating the existing private access drive which leads directly off the A260 Canterbury Road.



8.00. Disabled Access

8.01. Whilst holiday Lodges, do not fall within the same criteria as conventional buildings for disabled access - every consideration is being given towards holidaymakers with disabilities.

8.02. Policies relating to access by people with disabilities have been fully considered for this scheme and Lodges will be available for all inclusive access. The scheme will be fully compliant with current legislation.

9.00. Community Safety

9.01. The close proximity of the owners property at Little Densole Farm would enable 24 hour supervision, safety, control and security to be maintained. The design of the layout together with the proximity of the Lodges to each other, would ensure that supervision of the units and their occupants and contents can be readily achieved.

9.02. The location of the proposed Reception / Amenity Unit would also enable full supervision of the access and the holiday park.

10.00. Movement within the development and Car Parking

Car Parking is within a screened car park area adjacent to the Reception. Guests would be transported to the Lodges via adapted specialist Golf Buggies. Wheelchair adapted buggies will also be available for use via Holidaymakers with disabilities to ensure all inclusive access.

11.00. Visual Amenity / Neighbouring Properties / Public Rights of Way

11.01. The site comprises of an agricultural field and is enveloped on 2 sides by mature existing woodland, with a high, mature and expanded hedgerow on the north-western boundary. It is therefore exceptionally well screened with virtually no views into the site from without – this would ensure that there would be no detrimental impact upon visual amenity or the AONB

11.02. There are no Public Footpaths or Rights of Way which cross the Application Site or which would be impacted upon by the proposed development

11.03. The site is located almost immediately adjacent to the settlement of Densole with many residential properties closely related to the application site. Whilst the site lies within the North Downs AONB), the nature and landscape character of the area is influenced by the close proximity of the adjacent settlement and properties - and should not therefore be considered or assessed as per significantly more vulnerable sites elsewhere in the AONB or Special Landscape Area.

11.04. The site is related to other development in the immediate vicinity and has the benefit of being able to provide a suitable facility with almost immediate access to the AONB without having any detrimental impact upon the more sensitive areas within the AONB if such a proposal were to be sited elsewhere within it.

11.05. Due to the topography, surrounding existing mature woodland and expanded existing hedgerows which surround the site, and the significant additional landscaping proposed this ensures that the proposal would be unseen from without. Thus affording total seclusion and ensuring that the Lodges in muted environmental colours would blend seamlessly and fully into the natural environment.

12.00. Foul Sewer, Electricity and Mains Water

12.01. Mains electricity, water and foul sewage are all available in close proximity to the site. Should mains Sewage disposal not be a feasible option, disposal would be undertaken via a self contained package treatment plant.

13.00. Flood Zone

13.01. An enquiry has been undertaken with the Environment Agency which identifies from their Flood Plain Maps that the whole of the site, and the surrounding area falls in its entirety within Flood Zone 1 (1 in 1000 chance of occurring each year). This is classified as being at the lowest risk of flooding by the Environment Agency.

13.02. The Site is not in Flood Plain and is not at Risk of Flooding, the proposals therefore comply with Local Development Plan Policy and the NPPF in that the site is classified as Flood Zone 1 and is therefore at the lowest risk of Flooding.

14.00. Environmental Sustainability / Sustainable Development

14.01. The proposal is environmentally sustainable, makes the best use of resources and meets with Policies which relate to Sustainability. The site is appropriately located in a Holiday Area, in which Tourism Regeneration is actively supported and encouraged. It has easy access, and has the benefit of accessibility to public footpaths and public transport being available. Day to day facilities and attractions are located within a short travelling distance. No land is being utilised which has been allocated for other land uses.

14.02. It is anticipated that the scheme will incorporate sustainable drainage, Solar PV Panels / photovoltaic Cells, Grey Water Harvesting Systems, Log Burning Stoves and Ground / Air Source Heat Pumps. Lighting would be via minimal low level ambient lighting, with the emphasis on background lighting rather than full illumination.

15.00. General Development Control Guidance.

The proposal satisfies General Development Control Guidance in that :-

1. THE DEVELOPMENT PAYS DUE REGARD TO ITS SURROUNDINGS IN TERMS OF SCALE, SITING, DESIGN AND MATERIALS,
2. THE DEVELOPMENT DOES NOT HAVE AN ADVERSE VISUAL IMPACT ON THE STREET SCENE OR LANDSCAPE,
3. THE DEVELOPMENT DOES NOT HAVE AN ADVERSE EFFECT ON NATURE CONSERVATION INTERESTS,
4. THE DEVELOPMENT PAYS DUE REGARD TO THE AMENITY OF OCCUPIERS OF ADJOINING PROPERTY
5. PROVISION IS MADE FOR SATISFACTORY ACCESS AND CAR PARKING
6. THE DEVELOPMENT PAYS DUE REGARD TO THE EXISTING PUBLIC RIGHTS OF WAY NETWORK,
7. THE REQUIRED INFRASTRUCTURE IS EITHER EXISTING, AVAILABLE AND/OR CAPABLE OF CONSTRUCTION TO SERV THE PROPOSED DEVELOPMENT,
8. THE DEVELOPMENT RESPECTS THE CHARACTER AND SETTING OF THE AREA
9. THE DEVELOPMENT WILL NOT CAUSE OR EXACERBATE THE RISK OF FLOODING.

16.00. The Scheme (Including Appearance Character, Design & Landscape Strategy etc)

A detailed 1:1250 scale presentation drawing has been prepared illustrating the proposals and layout of the scheme.

16.01. The design is to create a very attractive low density curvilinear layout with the Lodges, located in informal clusters, with open areas and large belts of new landscaping, which have wildlife, habitat, amenity and landscape benefits and to further aid screening. The aim being to create an extremely high quality upmarket, exclusive 5 star holiday park facility.

16.02. Developments of this nature are the exact opposite and in stark contrast to conventional holiday park layouts with the units located very closely together in regimented rows which have a huge impact on visual amenity and are significantly less desirable in the tourism market.

16.03. The traffic arriving to the holiday park would be serviced from the existing access drive that leads off the A260 Canterbury Road. Mains services will be provided to the site and construction would be undertaken over a short period to ensure minimal intrusion.

16.04. The timber "Lodges" would be environmentally coloured in a range of muted colours to blend in with the natural environment – colours to be agreed with the LPA. The Landscaping would be undertaken immediately to ensure that maximum time is available to establish the landscaping.

16.05. Development would be undertaken in two phases over 2 years as demand allows – thus ensuring that it is a scheme that is constructed in line with demand, and is deliverable, which would ensure that there would be no unnecessary risk to the developer or local authority.

17.00. Layout

A significant amount of for-thought and consideration has gone into the preparation of the layout plan. The Lodges are all totally screened and together with the landscaping proposed would ensure absolutely no intrusion on the locality or neighbouring property.

18.00. Landscaping

Part of the proposals is to establish supplemental indigenous planting belts within the site, which in addition to the existing mature woodland which surrounds the site fully screens the proposals and creates an attractive and desirable holiday environment.

19.00. Scale

19.01. The type, style and quality of the Holiday Lodges proposed would not impinge upon the current market of existing tourism accommodation in the locality, but would significantly help raise standards of the type and style of tourist accommodation offered. The implications on continued and expanded rural employment also deserve significant consideration, as well as the impact on spends within the local economy.

19.02. Schemes of this nature encourage tourism usage in the "off-season" shoulder months - Current Government and Tourist Board Policies being to encourage tourism in the shoulder months - to not only spread the demand and impact on infrastructure but also to get away from the in-continuity of seasonal jobs and income to the tourism market. This ultimately results in the creation of quality year round jobs.

19.03. The applicants are seeking a conventional 12 month holiday season which is in line with many other holiday parks.

20.00. Policy Context, Appraisal and General Supporting Information.

20.01. Current Local Development Plan Policy principally consists of The Shepway Core Strategy 2013 and The Shepway District Local Plan Review – Saved Policies 2013.

20.02. It cannot be overemphasised that each scheme should be judged upon its own merits and benefits. Given the sites location within the AONB, planning policy for development is restrictive. Where a scheme may be considered that it could potentially be against planning policy, if it is deemed that there are enough significant benefits or special circumstances to a scheme to outbalance the general presumption against development, then this enables the LPA to support a scheme as a Departure from The Development Plan Policy.

20.03. For ease of reference the most relevant Policies and supporting information which relate to such an exclusive Holiday Park scheme are reproduced in the Appendix.

20.04. Policy Appraisal of the Proposal

20.05. We have considered the prevailing Planning policies that are likely to be the principle considerations in the determination of this application. It is understood that the main considerations will relate to :-

- the visual impact of the proposal in relation to the AONB
- impact on neighbour amenity
- impact on highways, and
- the economic and employment benefits that the proposal would bring

20.06. If we firstly consider the nature of the proposals against the prevailing policies that seek to protect the AONB and the Countryside. The proposed Lodges would be constructed from timber and stained in a palette of muted environmental colours. The units would be sited in a lakeside setting, in a low density informal layout, with expanded tree and woodland belts surrounding the site, creating wildlife corridors which link up with the adjacent mature Reinden wood – this existing woodland also creates a significant backdrop to the site on two sides.

20.07. The proposed Lodges will therefore sit comfortably within the new lakeside woodland setting and merge into the background of the existing trees and not be visually prominent.

20.08. As the proposed Lodges and landscaping have been designed to harmonise with the woodland setting, and given the design considerations set out above, the proposed units are not considered to be unsympathetic or visually harmful. Furthermore, the site sits well within the landscape being surrounded on two sides by mature woodland, with an existing high expanded hedgerow to the west. Once the planting has become established the units would not be visible in views from the wider landscape and would thus be unseen from views in the public domain.

The scheme therefore accords with Policy CSD4 which stipulates that Improvements in green infrastructure assets in the district will be actively encouraged and avoid a net loss of biodiversity. Such proposals are also supported by Policy CO1 which supports schemes which are of a high standard, can be assimilated into the natural environment and demonstrate that they require a countryside location, and cannot be located within an existing settlement.

20.09. Given the above, it is also considered that the development would not be detrimental to the designated countryside location, or harmful to Visual Amenity and would not detract from the

appearance of the AONB – thus fulfilling the requirements of Policies which seek to protect the Countryside and AONB.

20.10. As the development would not be highly prominent in the landscape and as it is set against the backdrop of the woodland, the development will have limited visual impact, and accordingly, the proposal also accords with the NPPF.

20.11. Furthermore, given the limited harm to the countryside and AONB, in this special and unique instance, the wider economic benefits to employment and the local economy would represent and result in additional revenue streams which would outweigh any limited harm. As such, given the support in local policy CSD3 and national planning guidance for sustainable rural tourism, it is considered that the limited harm would be outweighed by the economic benefits in policy terms. Therefore, whilst accepting the weight given to protecting the AONB landscape, it is considered that in this instance for the reasons set out above, the proposal does not warrant refusal on the grounds of the impact on the AONB - and that any impact of the development can be mitigated by the nature of the landscaping and appearance of the Lodges proposed. These factors can all be controlled by appropriate Conditions on any approval.

20.12. There are no neighbour amenity issues in relation to this proposal, the nearest neighbouring properties lying on average between 150 and 200 metres from the Holiday Park site itself. The proposal will be fully enveloped in expanded tree belts & extensive landscaping and also sited behind an existing high expanded hedgerow. Although the intensity of the use of the land would increase, it is considered there would be no significant loss of residential amenity for the occupiers in accordance with the saved policy SD1.

20.13. The site lies to the south-east of the main A260 Canterbury Road, holidaymaker access would be via the improved existing highway access. The Transport Statement establishes that given the scale of the proposal, the traffic generation of the scheme is likely to be very light and fall outside the general existing highway network peak hour periods. The existing access also provides visibility commensurate with the recorded speed of traffic and could easily accommodate the proposal.

20.14. It is therefore considered that the proposed development would not impact adversely on the public highway and is in accordance with NPPF as there are no highway reasons why such a proposal could not be granted planning permission.

20.15. The NPPF is supportive of economic growth in rural areas and encourages sustainable rural tourism developments 'that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside'.

20.16. Paragraph 28 of the NPPF also states that *'this should include 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'*. Policy CSD3 of the Shepway Core Strategy also supports new rural tourism developments in principle in locations outside the identified Settlement Hierarchy.

20.17. The small scale, nature and type of holiday park development proposed requires a rural, countryside location and cannot be practicably located within an existing settlement and essentially requires a countryside location. Such a scheme would therefore be unworkable, undesirable to holidaymakers and inappropriate if located within a developed settlement. The proposal therefore accords with the thrust of Policy CSD3 and Policy CO1 which advises that Subject to other Plan policies, development in the countryside will be permitted where proposals maintain or enhance the landscape, are of a high standard, sympathetic to the environment and

are acceptable in Highway Terms, any negative impacts are minimised and where sites are unavailable within settlements.

20.18. The Local Plan Review identifies that Tourism has changed significantly during the last thirty years, that there is growing demand for quality rural self-catering accommodation, and that New tourist development can contribute significantly and positively to the local economy and attract investment. The document also identifies that with the opening of the Channel Tunnel and associated improvements in transport links, the area has a key tourism role as a Gateway to and from Continental Europe.

20.19. The Plan sets out to secure the development and provision of new tourist facilities to benefit the District's tourism industry, visitors and residents and help broaden the products offered, and specifically to broaden the quality and nature of accommodation which will help to lengthen the tourist season. The Plan advises that it specifically encourages and supports such enterprise provided that it is carried out in a safe and environmentally acceptable way.

20.20. This scheme at Little Densole Farm is for a small scale unique and exclusive Holiday Park which accords with the criteria of all the prevailing policies, in that it provides a net gain of Green Infrastructure, Habitat Creation, reinstatement of historic field boundaries, woodland tree belts & copses and in addition also provides an outdoor fishing sport facility – together with the benefits of significant revenue generation to the benefit of the local economy and other attractions in the area.

20.21. For the reasons given above, it is considered that the type, nature, location and format of the scheme and the significant economic and employment benefits the proposal offers, that the proposal fully accords with Local Development Plan policies.

20.22. In conclusion, given the above and considering the strong economic arguments in favour of the application, we would be grateful if the proposal could be approved, with appropriate conditions.

20.23. Catalytic Impacts

20.24. The holiday park sector is a very important part of the UK visitor economy due to its size and its apparent resilience in the recent economic downturn. The sector impacts on other parts of economies local to individual parks – for example many local shops, garages, visitor attractions etc. survive only because of trade from visitors staying at holiday parks. Parks typically contribute about 20% of the income to rural economies in popular tourism areas, and sustain around 15% of full-time and seasonal jobs which the tourist board estimates are tourism-dependent.

20.25. Recent data available from the BH&HPA demonstrates that the Annual Economic Contribution per Holiday Unit / Lodge is almost £26,000 per annum.

20.26. Tourism is highly seasonal, it is widely acknowledged by tourist boards that "Britain must seek to attract less seasonal and higher yielding tourism business in the six month shoulder period October - March when the industry operates well below capacity... Tourism must be supported through the growth of sustainable means i.e. the extending of the season and improving the business yield... also spreading the volume and value of tourism throughout the year... almost 60% of all holiday expenditure occurs in the three months of June, July, and August. This seasonal pattern has contributed to low profitability, higher than average seasonal variations on employment and has led to environmental pressures"

22.00. Summary of specific Special Reasons / Significant Benefits

1). There is a significant demand for quality, modern, exclusive Holiday Lodge, and tourism accommodation in the locality and nationally - the proposal contributes to the lengthening of the tourist season.

This demand is significantly boosted in this location due to the accessibility to the main motorway network and the European Market due to the sites close proximity to the Channel Tunnel and Dover Ferry Terminals.

2). The scheme would be of significant economic benefit to the area and local economy and will result in the diversification of the local rural economy. It would create full and part time employment opportunities in the area.

3). Other tourist attractions in the area would benefit from the proposals.

4). Schemes of this nature and in this location need to be encouraged.

5). The proposal will be a major boost to Tourism Regeneration in the area.

6). The sites proximity to the main road network, footpaths and available public transport, encourages alternative modes of transport.

7). The scheme would enable the continued improvement, development and diversification of the tourism product and generate significant employment opportunities and the regeneration of the tourism product.

8). **Recognised statistics demonstrate that this scheme would generate circa £308,496 into the local economy on an annual basis.**

9). The above are very significant site specific circumstances which justify the proposed scheme. The proposals are in line with Local Development Plan Policy as well as Central Government and Tourist Board Policies.

We therefore consider that given the significant benefits proposed, not only to the local rural economy which is heavily reliant on the tourism, industry but also to the creation of a 5* Tourism Facility of a quality which is not available in the area that this scheme should be considered for Approval.

Jonathan Moore Lambe © 1st June 2016



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PTO : Appendices



Appendix 1. Policies (the most relevant sections are highlighted in red)

Core Strategy

Policy CSD3 Rural and Tourism Development of Shepway

Tourist, recreation and rural economic uses will be appropriately protected and new development allowed within defined settlements in the Settlement Network. **Where sites are unavailable within settlements – and development is proportionate in scale/impact and also accessible by a choice of means of transport – it may also be acceptable on the edge of Strategic Towns and Service Centres, and failing that, Rural Centres and Primary Villages.**

Policy CSD4 stipulates that :

Improvements in green infrastructure (GI) assets in the district will be actively encouraged.

- a. Development must **avoid a net loss of biodiversity.**
- e. Planning decisions will have close regard to the need for conservation and enhancement of natural beauty in the AONB and its setting.

Protecting and enhancing biodiversity and access to nature, particularly in green corridors

Identifying opportunities to expand the GI functions of greenspaces and their contribution to a positive sense of place (**including enhancements to public open spaces and outdoor sports facilities**).

The Shepway District Local Plan Review – Saved Policies 2013.

POLICY CO1

The District Planning Authority will protect the countryside for its own sake. **Subject to other Plan policies, development in the countryside will be permitted where proposals:**

- a) maintain or enhance features of landscape, wildlife, historic, geological and agricultural importance, and the particular quality and character of the countryside;
- b) demonstrate that they cannot be practicably located within an existing settlement and essentially require a countryside location;
- c) are of a high standard of design and, sympathetic in scale and appearance to their setting;
- d) are acceptable in highway and infrastructure terms and;
- e) preserve or enhance the amenity, character and functioning of rural towns and villages.

Development proposals that would significantly conflict with one or more of criteria a - e

above will only be permitted where it can be shown that:

- i) there is an overriding social or economic need;
- ii) negative impacts are minimised as far as possible and;
- iii) adequate measures will be taken to compensate for any the adverse environmental effect. Compensatory measures should, as a minimum, ensure that no net environmental loss occurs.

Note: For the purposes of Policy CO1, the Countryside is defined as the area outside of the settlement boundaries identified on the proposals map. Where land in the countryside is allocated on the proposals map for a specific development purpose, the associated policy will take precedence over Policy CO1.

20.04. The explanatory notes contained within the Tourism, Chapter buffer out the Tourism Policies and explain in detail the Council's approach and value of the Tourism Product. Relevant extracts are quoted below :-

6.1 The District has a well-established tourism industry with its origins in domestic long stay holidays at the seaside areas of Folkestone, Hythe and the Romney Marsh. The District is still extremely popular as a tourist destination and tourism provides valuable local employment and recreational facilities.

6.2 Tourism has changed significantly during the last thirty years with, for example, a strong growth in interest in the countryside and history. These trends present new opportunities for tourism development in the District which benefits from having an exceptionally attractive countryside and coastline, and a richly diverse built heritage of towns, villages and hamlets.

6.3 Recent trends in domestic tourism have shown a growth in short breaks and a decline in long holidays (except in camping and caravanning). There is a need for the district to respond to such trends in order to strengthen its position in domestic and overseas markets. With the opening of the Channel Tunnel in 1994 and the associated improvements in transport links the District will further strengthen its key tourism role as a Gateway to and from Continental Europe.

6.4 With this combination of factors the opportunity exists for the continued growth of tourism within the District throughout the Plan period. A tourism strategy has been produced based on a number of marketing / product themes, namely capitalising on the rural hinterland and supporting the development of Folkestone seafront and harbour area with a maritime theme.

6.5 This chapter provides policies regarding the development of visitor accommodation, rural tourism, and major tourism opportunities.

Tourism aims and objectives

6.6 The broad tourism aims of the Plan are:-

1. To maximise the economic, environmental and social benefits that tourism has the potential to provide for the District.
2. To protect and support the development of tourism and in particular new tourist facilities in the District where there is no overriding conflict with environmental and economic objectives and where such facilities diversify the tourist attraction base of the District and will help to lengthen the tourist season.
3. To ensure that any new tourism development has the maximum benefit for local communities and to improve the quality and choice of transport accessibility to new tourism attractions, reducing the reliance on the private car.
4. To support policies for the protection, enhancement and promotion of the District's unique built and natural environment as its major tourism asset.
5. To exploit the District's role as a Gateway to and from Continental Europe.

6. The tourism objectives of the District Plan are:-

1. To secure the provision of new tourist facilities to benefit the District's tourism industry, visitors and residents and help broaden the products offered.
2. To facilitate rural tourism developments where these draw on and enhance the District's built and natural heritage in order to support the countryside's economy, social life and environment.
3. To identify sites suitable for new hotel development to encourage Eurotunnel users and other transit tourists to remain within the District.
4. To maintain the role of the area as a tourist destination by protecting the stock of hotel and guesthouses and other holiday accommodation from conversion to non tourist related uses and encourage improvements to this accommodation.
5. To prevent the establishment of environmentally detrimental caravan, camping and chalet sites areas and where sites are acceptable to provide firm guidelines for potential developers.
6. To encourage improvements in the standards of accommodation of caravan, chalet and camping sites.

New tourist development.

6.8 Tourism can contribute significantly and positively to the local economy, help to achieve environmental improvement objectives, provide socially desirable leisure facilities, and if developed appropriately help to attract investment by presenting a positive image of the District.

Tourism in rural areas

6.20 The district's high quality countryside is an important tourist asset and there is a great and growing interest in the countryside as a place to visit. One of the aims of the tourism strategy is to capitalise on the attractions of the rural hinterland and encourage holidays and short breaks, which are based on rural pursuits. At the same time farmers are under pressure to remove land from agricultural production so that many are seeking alternative sources of income.

6.21 Rural tourism can satisfy visitors' demands for leisure in the countryside while supporting rural economies and helping to maintain the countryside's attractiveness. The special qualities of the District's countryside provide opportunities for rural tourism and the District Plan supports such enterprise provided that it is carried out in a safe and environmentally acceptable way.

6.22 There is a growing demand for quality rural self-catering accommodation and the conversion and restoration of rural buildings for this use can help to satisfy demand. Due to this growing demand for rural accommodation, the loss of such facilities will be resisted. Proposals for the conversion or redevelopment to another use will be judged against Policy TM2.

POLICY SD 1

All development proposals should take account of the broad aim of **sustainable development** - ensuring that development contributes towards ensuring a better quality of life for everyone, now and for generations to come. This involves meeting economic and social objectives and helping people meet their personal aspirations through accommodating the district's need for commercial and industrial development, new homes and other land uses and improving quality of life for all members of society whilst respecting the following environmental criteria:

- a) Shape new development patterns in a way which reduces the need to travel, especially by car, and increases the attractiveness of walking, cycling and public transport;
- b) Preserve and enhance built and cultural heritage including Listed Buildings and their settings, conservation areas, sites and settings of nationally and locally important ancient monuments and archaeological sites, historic parks and gardens and, historic landscapes;
- c) Protect and enhance areas of countryside that are of special quality, particularly the Kent Downs Area of Outstanding Natural Beauty, Special Landscape Areas, Local Landscape Areas, Heritage Coast and undeveloped coast, ancient woodlands and, the best and most versatile agricultural land. Sustain the character and diversity of the wider countryside in general;
- d) Protect and enhance designated or proposed sites of international, national, countywide and local wildlife importance and plant or animal life protected by law. Maintain the District's overall stock of nature conservation resources;
- e) Locate new development within or around existing built-up areas, especially on previously developed land, in preference to 'greenfield' sites;
- f) Maintain and improve the character and vitality of the built environment, promote a high quality of design and ensure that development density is appropriate to its location;

- g) Encourage energy efficiency and conservation, re-use and recycling of materials and, the sensitive development of renewable energy resources;
- h) Maintain and enhance water, soil and air quality;
- i) Maintain and enhance the provision of recreational open space, amenity land and tree and hedgerow cover;
- j) Prevent negative impacts on coastal protection, flood defence, land drainage and groundwater resources.
- k) Safeguard and enhance the amenity of residents

Development proposals that would significantly conflict with one or more of environmental criteria **a) - k)** above will only be permitted where it can be shown that:

- i. there is an overriding economic or social need;
- ii. negative impacts are minimised as far as possible and;
- iii. measures will be taken to compensate for the adverse environmental effect. Compensatory measures should, as a minimum, ensure that no net environmental loss occurs.

POLICY BE1

A high standard of **layout, design and choice of materials** will be expected for all new development. Materials should be sympathetic to those predominating locally in type, colour and texture. Development should accord with existing development in the locality, where the site and surrounding development are physically and visually interrelated in respect of building form, mass, height, and elevational details.

Planning applications for development with an element of public use will be assessed as to their provision for access for disabled persons in respect of site layout and the relationship between buildings and their car parking areas and other public access points.

Development proposals must demonstrate that account is taken of opportunities to reduce the incidence of crime and the fear of crime against both property and the person.

POLICY BE16

The District Planning Authority will require development proposals to retain important **existing landscape features** and make appropriate provision for new planting using locally native species of plants wherever possible. All full or detailed development proposals should be accompanied by a landscaping plan identifying both existing and proposed landscaping detail. The District Planning Authority will, where necessary, make any permission conditional upon a satisfactory landscaping scheme being agreed and implemented within a specified period, where such a scheme does not accompany an application.

Policy DSD Delivering Sustainable Development

When considering development proposals Shepway District Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the council will grant permission unless material considerations indicate otherwise – taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or

- Specific policies in that Framework indicate that development should be restricted. Shepway District Council will implement the policies and proposals of the Core Strategy to meet milestones and seek to ensure that essential infrastructure to support regeneration is secured through Policy SS5 and by:

- a. Working with partner organisations on local plans delivery and in development management of planning applications;

- b. Producing further local plans with a focus on specific sites, delivery/funding arrangements and detailed planning policies;

- c. Preparing AMRs to review the effectiveness of policies and the collection of resources for infrastructure projects;

- d. Undertaking pre-application discussions with developers and involving partner organisations where appropriate;

- e. Negotiating legal agreements and obligations as suitable, utilising other powers and non-planning capabilities;

- f. Taking a corporate lead in place-shaping through aligning with Shepway District Council's own activities and internal strategies.

Shepway District Council will collaborate with partners on the sustainable development of the area in accordance with the statutory Duty to Co-operate

Government Policies and Guidance in support.

The National Planning Policy Framework

The policies and guidance contained within this document all contain significant advice which advocates support for schemes of this nature which are related to Tourism and Leisure and the Diversification of the Local Rural Economy.

The NPPF (Policy 3) supports sustainable rural tourism, and recognises that it is vital to many rural economies. Encouragement is given to development plans which support the provision and expansion of tourist and visitor facilities in appropriate locations.

The NPPF was formally adopted on 27 March 2012 it 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 needs and aspirations.

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".*

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.

Paragraph 19 states that :-

'significant weight should be placed on the need to support economic growth through the planning system'.

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'.

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'.

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”.

There are no adverse impacts arising from this proposal that would carry sufficient weight to outweigh the benefits. This proposal therefore accords with the key objective of the new NPPF of achieving sustainable development.

In September 2009 the British Holiday & Home Parks Association (BH&HPA) published information on the financial contributions that the “Parks Industry” and Tourism Industry made to the economy. The article “The Contribution of the Holiday Parks Industry” advised :-

“Those drafting local authorities planning policies, and councillors and planning officials charged with making planning decisions, should be left in no doubt about the value of holiday and touring parks. This is absolutely vital to offset some of the prejudice that all too often stands in the way of parks legitimate plans. Too often members find the planning system presents a formidable obstacle to any proposals for new or expanded holiday, touring and camping parks that could help sustain rural economies.”

One key relevant fact was that - Every two holiday home units accounted for one tourism job
(source BH&HPA Journal, March – April 2001)

In April 2012 the BH&HPA published the following figures that the UK Holiday Parks Industry Accounted for :-

UK economic impact

The total turnover and visitor expenditure of the UK holiday and touring parks industry is approximately £4 billion per annum. The total economic impact to the UK has been calculated as a Gross Value Added (GVA) contribution of £1.4 billion per annum, supporting a total of 53,000 direct and indirect jobs in the UK. Generated by 19.5 million visitors and 168 million visitor days.

Visitor numbers

The UK holiday and touring park industry attracts approximately 19.5 million visitors per annum, who spend a total of 168 million visitor days on parks. Of these 19.5 million visitors, 11.7 million stay in privately-owned caravan holiday homes, 4 million stay in letting units and 3.8 million stay in tourers. Of the 168 million visitor days, 100.5 million are spent staying in privately-owned caravan holiday homes, 35 million in letting units and 32.5 million in touring caravans and tents.

Direct staff numbers

The UK holiday park industry supports 26,500 Full Time Equivalent (FTE) direct jobs at an average wage per FTE job of £18,500.

Appendix 2. Employment

Employment Figure Calculations are based upon a 52 week season, these are based upon our experience within the industry (in excess of 35 years) and demonstrate that this scheme would create 11 Full Time Equivalent Jobs comprising of 6 Full Time & 10 Part Time Jobs = a Full Time Equivalent of 11 positions.

This comprises of the following positions :-

- 1). Manager x 1 no. Full Time
- 2). Reception Staff = 2 no. x Full Time and 1 no. x Part time and to cover holidays etc.

Reception cover requirement is based upon a mix of "short and long breaks" with three Change Over Days comprising :-

- a). Friday (for 3 night weekend breaks),
- b). Saturday (7 night breaks) and
- c). Mondays (4 night mid week breaks)

This covers weekly lets, weekend breaks and mid week breaks. Therefore Reception cover is required for the following days and to cover arrivals and departures :-

Reception Hours

Friday, Saturday, Monday 8 a.m. to 10 p.m. = 14 hrs per day x 3 days = 42 hours (note the late arrivals frequency is very high due to the proximity of the Channel Tunnel, outside these hours Arrivals can be dealt with via the manager).

Sunday, Tuesday, Wednesday, Thursday 8 a.m. to 6.p.m. = 10 hrs x 4 days = 40 hours
Total Reception = 82 hours per week = 2 no. x Full Time and 1 no. x Part Time and to cover Holidays, Time Off and Sick Leave etc.

- 3). Groundsmen x 2 no. Full Time (Lake and hard & soft landscaping areas)
- 4). Maintenance x 1 no. Full Time & 1 Part Time (Lodges, Tennis Courts, Reception, Store, Piers, Foot Bridge, Bike Stores, Bin Compounds etc.)
- 5). Fishing Instructor x 1 no. Part Time
- 6). Tennis Coach x 1 no. Part Time
- 7). Cleaners for 12 units = based upon Mid Week & Weekend Breaks = up to 24 change overs over 2 change over days = 6 no. x part time cleaners

Estimated employment = 6 Full Time and 10 Part Time with a Full Time Equivalent of 11.