

Design & Access / Planning Statement

V1.1

Proposed Small Scale Exclusive Holiday Fishing Accommodation of Pods and Lodges

at

Commonwood Fishery

Buck Road
Commonwood
Holt Wrexham
LL13 9TF



Client :-

Mr and Mrs Paul Dunn, Horseshoe Barn, Borrass Road, Wrexham LL13 9TL

Proposal Description :-

Proposed Small Scale Development for Holiday Fishing Accommodation at Commonwood Fishery, Buck Road, Commonwood, Holt, Wrexham LL13 9TF

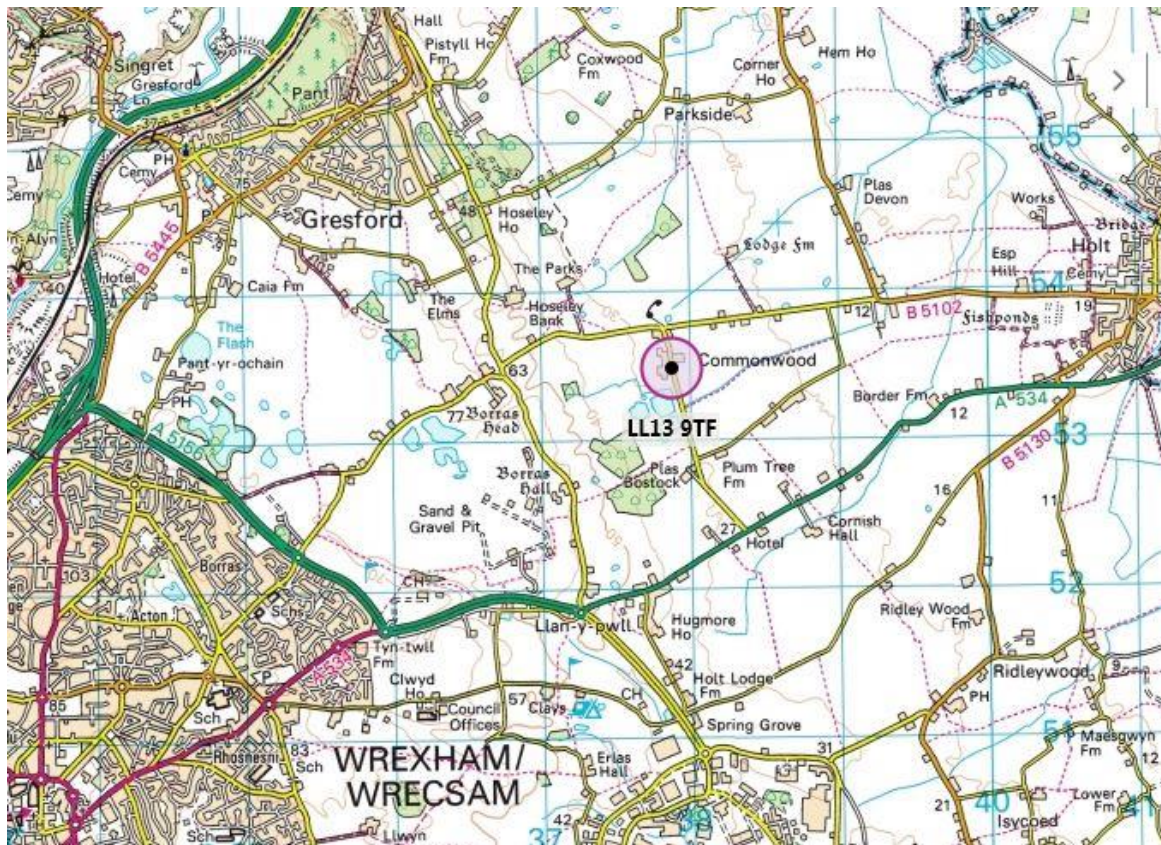
This *Design & Access / Planning Statement* covers the following aspects :- Context, Involvement, Design, Layout, Scale, Landscape, Landscaping, Appearance, Access, Use, Amount, Tourism and Benefits to the Local Economy - and supporting information regarding, Local Development Plan, Central Government 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.** Commonwood Fishery is an existing Tourism and Leisure Fishing Attraction located at, Commonwood, near Holt, Wrexham. The site is immediately adjacent to Buck Road. The Fishery is located within a recognised holiday area, approximately 2.4kms from Wrexham
- 1.02.** Commonwood Fishery has 8 challenging fishing lakes fully stocked with a variety of Course Fish. The type of stock being aimed at the family fisherman, women and children, together with additional associated facilities including full disabled access to most of the lakes / swims. The attraction is aimed specifically at the family market with children where demand has been identified – this has lead onto a natural progression where there is significant demand from families for on-site Holiday Fishing Accommodation.
- 1.03.** The operators / owners of the Fishery receive requests on a daily basis from customers who wish to come and enjoy overnight fishing breaks with their close families – particularly from fathers and their children. The Applicants do not wish to develop a conventional holiday development, but merely to offer peaceful family fishing breaks, where families can enjoy peace and tranquillity and stay on site whilst enjoying the angling facilities.
- 1.04.** The site is undulating, and is exceptionally well screened due to the significant planting and landscaping which has been undertaken on site in connection with the existing leisure use of the fishery. It is surrounded by expanded hedgerows and mature trees. The nearest residential properties are farms which are approx. 400 metres from the southern boundary.
- 1.05.** In planning terms the site forms part of the operational extent of the Fishery / Planning Unit. The proposed holiday fishing accommodation would be Ancillary to the existing Fishery and would provide the necessary support to the primary activities and operation of this existing enterprise.
- 1.06.** The subject of this planning application relates to a small area within Commonwood Fishery, where it is proposed to site Holiday Fishing Lodges and Pods, for the use of existing Visitors to the attraction - it is identified on the aerial image at Figure 2.

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

(Image courtesy of Ordnance Survey)

**Figure 2.** Commonwood Fishery is identified below. The extent of the Fishery and Ownership is identified outlined in red.

- 1.07.** The Fishery needs to diversify and react to market demands to enable it to compete with other local attractions and offer the Tourism Product which is now sought by discerning customers. The proposals would create employment and contribute a significant amount to the local rural economy which is heavily dependent on the tourist's trade – and helps to support the local economy, other local attractions, public houses, restaurants and convenience stores in the locality.
- 1.08.** It is anticipated that this scheme would generate in excess of £387,536 in spends into the local economy on an annual basis. Please see **Appendix 2.** regarding Industry Statistics demonstrating the level of spends & employment generation of benefit to the local rural economy.
- 1.09.** A structured site selection process has been adopted for the choice of a site appropriate for a small scale and exclusive 5* Holiday Fishing Accommodation allied to the existing Attraction - all as advocated by current Guidance and Development Plan Policy.
- 1.10.** 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 proposed location had to be visually unobtrusive and attractive for the proposed purpose
 - 2).** With good road access and links to the main motorway networks
 - 3).** In an area where there was demand for such a facility.
 - 4).** The chosen site had to be appropriate to the rural area, and related to other existing development and
 - 5).** not impact adversely upon the area or neighbouring properties.
- 1.11.** The proposed layout for the Fishing Lodges and Pods is of a very low density with the units located informally with significant belts of new landscaping and planting in indigenous species. The essence of the scheme being to create an exclusive 5 star facility - totally unlike any other Leisure or Holiday product currently being offered in the North Wales area.
- 1.12.** The proposals are solely related to the ongoing creation of an upmarket tourism attraction and are exactly in line with Central Government Policies, Tourist Board Policies and Policies contained within the Local Development Plans. These directly encourage the creation of such facilities and accommodation.
- 1.13.** Please see **Appendix 2.** Industry Statistics demonstrating the level of spends & employment generation of benefit to the local rural economy.
- 1.14.** The high quality of accommodation proposed would significantly help raise the standards of holiday accommodation 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. 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.

- 1.15.** There is a very strong local and national trend towards more upmarket holidays, especially for more spacious and better equipped holiday accommodation. 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.
- 1.16.** 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"*.

Amount (and type of Development)

- 1.17.** The proposals are related to the demand identified for an exclusive facility of this nature in this location. The elements to the proposal comprise :-
- 8 Holiday Fishing Lodges
 - 12 Holiday Fishing Pods
 - New Lake
 - Central Facilities Building
 - Combined Reception / Office / Manager's Lodge
 - Ecological sound and Sustainable manufactured units
 - extremely high quality low density layout
 - units located in small groups and clusters
 - a hierarchy of Accommodation to cater for different budgets
 - landscaping and planting in broadly indigenous species of trees and shrubs
 - Units available with all Inclusive Access
- 1.18.** The Lodges and Pods would be constructed from timber and stained in a range of muted environmental colours to blend into the natural environment – colours to be agreed with the LPA.
- 1.19.** The proposals would be fully landscaped to ensure that they blend seamlessly into the natural environment. The opportunity for additional tree belts and internal landscaping in indigenous species of trees and shrubs would create wildlife corridors & habitats around the site. Please see the layout plan prepared by Lambe Planning & Design Ltd which accompanies the Application.
- 1.20.** The Fishing Lodges and Pods would be serviced via the existing access from the public highway and the existing drive within the Fishery. Mains services are already available on site, and due to the nature of the proposals the ground works would be minimal. The Lodges and Pods are prefabricated timber units manufactured off site and delivered by lorry and sited in a matter of hours.
- 1.21.** It is envisaged the siting of the Fishing Lodges would be undertaken in a phased way over potentially 1 to 2 years, as demand grew and funds from the development were generated. The Landscaping would be undertaken immediately to ensure that maximum time is available to establish the landscaping.

- 1.22. Lake Construction.** The proposed Lake dimensions are 70 x 45 metres in a north / south orientation. The Depth at the lake centre is to average 1.50 metres. The lake will have shallows around the lake edge - gently shelving 0.00 to 500mm deep at 0-3 metres into the lake.
- 1.23.** The ground conditions are natural clay, therefore no linings will be required. The lake will be formed by excavating into the surface, and no materials will be imported or exported from the site. The excavated material will be utilised to create landscaped berms on site.
- 1.24.** The lake will be self filling via natural means, i.e. rain, ground water, surface water and run-off - all as per the existing lakes at Commonwood Fishery. There is no requirement to impound any existing water courses, and no water abstraction is required.
- 1.25.** Extra Habitats will be created around the lake edge which will be of significant benefit to wildlife. This will be undertaken by allowing some long grass and other vegetation to grow / colonise in certain areas, and placing stones, logs and tall plants in spots around the lake edges.
- 1.26.** The general form of the lake will be created with scalloped edges rather than straight formal edges - these will provided many different micro / ecological conditions with variations in shade, depth and temperature.
- 1.27. Lake Stocking.** Commonwood Fishery is an existing Fishery, the Applicants are aware of all stocking requirements. The Lake will be stocked in full accordance with current legislation.

Figure 3. example photograph illustrating the typical design, style and appearance of a Lodge which can be stained in environmental colours to blend into the natural environment.



Figure 4. image illustrating the typical design, style and appearance of a Camping Pod, which can be stained in environmental colours to blend into the natural environment. These units are usually assessed against Touring Caravan and Tenting Policies due to their impermanence.



Figure 5. image illustrating the typical design, style and appearance of a Holiday Pod.



Figure 6. image illustrating the typical design, style and appearance of a Holiday Pod.



Figure 7. example photograph illustrating the typical design, style and appearance of a Lodge which can be stained in environmental colours to blend into the natural environment.



Figure 8. photograph illustrating the typical internal appearance of a Holiday Lodge, and the high standard of accommodation provided by such units.



Figure 9. photograph illustrating the typical quality and internal appearance of a Holiday Lodge



Figure 10. photograph illustrating the typical quality and internal appearance of a Holiday Lodge



Figure 11. photograph illustrating the typical quality and internal appearance of a Holiday Lodge



Figure 12. photograph illustrating the typical internal appearance & facilities of a Holiday Lodge



Figure 13. photograph illustrating the typical internal quality & appearance of a Holiday Lodge



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

- 2.01.** The site lies on and to the immediate west of Buck Road, and is a 10 minute drive from the M53 / M56 Motorway. The existing access is in ownership and is not shared with any other users.
- 2.02.** The sites location gives excellent access to the main motorway networks and links up with many major conurbations within a mere 1.00 to 2.5 hour drive. e.g. Chester, Manchester, Liverpool, Preston, Birmingham etc.
- 2.03.** The convenience of this location to the vast majority of major conurbations within the UK that are within a “weekend break” drive time, would ensure a continuous and steady demand for such an exclusive Holiday Fishing Facility – even during off season periods when Guy Fawkes, Christmas, New Year and Valentine breaks are becoming increasingly popular.

2.04. Disabled Access

- 2.05.** Whilst holiday Lodges and Pods do not fall within the same criteria as conventional buildings for disabled access - every consideration is being given towards holidaymakers with disabilities.
- 2.06.** Policies relating to access by people with disabilities have been fully considered for this scheme and units will be available for all inclusive access. The scheme will be fully compliant with current legislation.

2.07. Community Safety

- 2.08.** The design of the layout together with the proactive existing management of the owners of the Development would ensure that supervision of the Fishing Lodges and Pods, their occupants and contents can be readily achieved.
- 2.09.** Part of these proposals includes a Reception / Office / Managerial Lodge. The location of this unit is immediately adjacent to the entrance which would enable the 24 hour supervision and security of the Fishery and its Entrance to be undertaken. This location also enables the assistance of late arrivals and departures out of normal office hours.

2.10. Movement within the development and Car Parking

- 2.11.** Car Parking would be adjacent to the Lodges and Pods with direct access off the drive. There is also an existing additional parking area adjacent to the Fishery Shop and Café.

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

- 3.01.** The site is enveloped and fully screened by high expanded hedgerows and mature tree cover. Due to the topography and mature landscaping, there are no views into the site from without which would be damaged by this proposal. The low density informal layout of timber units in muted environmental colours and additional landscaping would ensure that there is no detrimental impact on visual amenity, or neighbouring properties.
- 3.02.** There are no Public Footpaths or Rights of Way which cross the site and no offsite public rights of way which would be hindered by the proposed development.

Figure 14. Photograph illustrating the site and the mature tree cover which even during the winter months ensures that the site is unseen from without.



Figure 15. Photograph illustrating the site and the mature tree cover which even during the winter months ensures that the site is unseen from without.



Figure 16. Photograph illustrating the site and the mature tree cover which even during the winter months ensures that the site is unseen from without.



Figure 17. Photograph taken illustrating the site and the mature tree cover which ensures that the site is unseen from without.



Figure 18. Image illustrating the site and the mature tree cover which surrounds the site which ensures that the proposed Lodges and Pods would be unseen from without.



Figure 19. Image illustrating the site and the mature tree cover which surrounds the site which ensures that the proposed Lodges and Pods would be unseen from without.

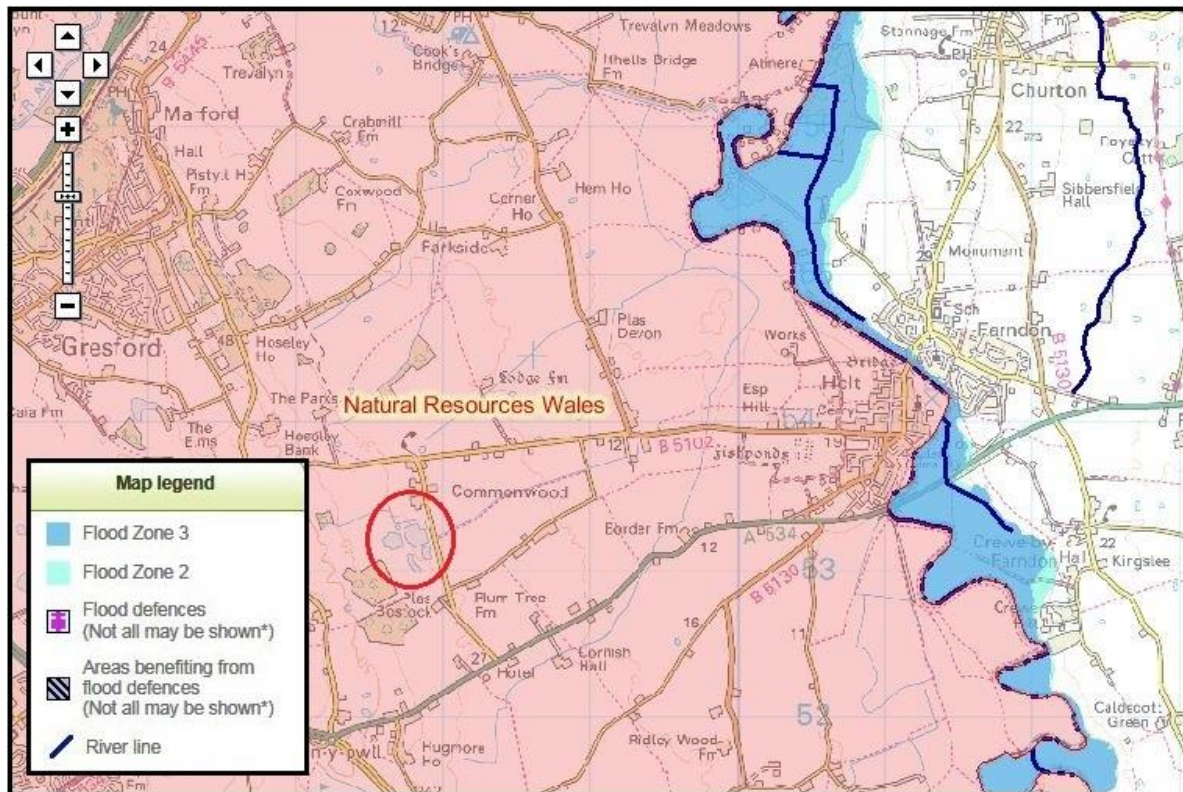


Figure 20. Specimen caught at Commonwood Fishery



4.00. Flood Zone

- 4.01.** An enquiry has been undertaken with Natural Resources Wales which identifies from their Flood Plain Maps that the whole of the site and 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.
- 4.02.** 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.

Figure 21. Natural Resources Wales enquiry - Flood Plain Map – site location ○

4.03. Foul Sewer, Electricity and Mains Water

4.04. Commonwood Fishery and the proposed site has the benefit of mains electricity on site. Foul sewage disposal would be undertaken via self contained package treatment plant. Pre-Application Consultations have been undertaken with both Dwr Cymru and also Natural Resources Wales. These consultations have identified that there is no viable option to connect into the Foul Sewer.

4.05. We are advised by Dwr Cymru Developer Services that the nearest Foul Sewer Connection is 1.19kms as the “crow flies” to the south, and via road this distance would be approx 2.0 to 2.5 kms. The grid reference points are 337 674X and 351 743Y the Manhole Reference is SJ 37516702 (Hugmore Lane).

4.06. The advice received from both the Environment Agency and Dwr Cymru (ref Meryl Read and Henry Jones-Hughes 25th April 2017) is that based upon the excessive distances involved to the nearest Foul Sewer Connection that we can therefore rule out Foul Sewer Disposal / Connection for the scheme.

4.07. The Applicant is aware of the requirement for a Package Treatment Plant NRW discharge permit. This will be applied for in due course once planning permission is granted.

4.08. Sustainability

4.09. A Sustainability Appraisal was undertaken as part of the The Transport Statement, its findings advise that :-

“there is the opportunity to access facilities and amenities further afield by way of public

transport, local cycle routes or PRoWs” and that “Whilst the proposals are for holiday accommodation, it will not necessarily be the same as general holiday accommodation sites, as the proposals are intended to provide accommodation for people who already visit the site to take part in the activities available. It is therefore likely that visitors will remain within the site for the majority of the time.”

Therefore with all of the benefits and features incorporated within the scheme, this would ensure that the scheme is sustainable and isn't reliant on motorcar travel for the arrival and departure of guests or visits to other attractions and facilities in the locality.

- 4.10.** It is proposed that the scheme will incorporate sustainable drainage, Solar PV Panels / photovoltaic Cells and Grey Water Harvesting Systems – subject to LPA agreement.
- 4.11.** The Lodges and Pods are manufactured from sustainable resources and are Ecological sound and Sustainable.
- 4.12.** 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, and which is considered to be a Tourism Regeneration Area. It has easy access, and has the benefit of accessibility to public footpaths and public transport being available.
- 4.13.** 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.
- 4.14. Additional documents & reports**

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

- 1:500 scale layout drawing
- 1:250 scale Lake cross sectional drawing
- Design and Access Statement / Planning Statement
- Location Plan
- Ecology Survey
- Arboricultural Appraisal / Tree Survey
- Transport Statement and Sustainability Statement
- Public Consultation and Community Involvement / PAC Report

The Transport and Sustainability Statement concludes that :-

“there are no highways or transportation reasons why the proposed development should not be granted planning permission”.

The Arboricultural / Tree Survey and Report were purposely undertaken prior to the proposals being finalised. The findings of the Report have been used to inform the layout and design of the scheme. The final plans have been prepared to accord with these recommendations, and the layout has therefore been prepared to allow for the retention of all trees and to avoid their Tree Root Protection Zones.

The Ecological Survey and Appraisal concludes that:-

“The recommendations of the Appraisal will enable the proposals to meet the requirements of national and local guidance and legislation including the NPPF and policies EC4 and EC6 within the Wrexham Unitary Development Plan.
and

“It is considered that there would be very limited impact on the local ecology as a result of the proposals.”

Pre-Application Consultation, Public Consultation & Community Involvement

As part of the Planning process, a Public Meeting, Consultation and Verbal Presentation including a Question and Answer Session was undertaken at Commonwood Fishery on Friday 31st March 2017. Notices were placed at the Fishery Entrance and invitations were extended to everyone. Nobody was excluded, and we have operated an open door policy and total transparency with this scheme.

As this scheme is classified as a “Major Development” due to the Application Site Area, a Pre-Application Consultation was also held not only with the general public / local residents , but also with Community Consultees and Specialist Consultees. Formal Notices was served and the Consultees included:- Holt Community Council, Natural Resources Wales, Dwr Cymru, Wrexham Highways, Councillors:- Cllr. Hugh Jones, Cllr. Michael Morris, Cllr. Ron Prince, Cllr. Keith Gregory, and the Neighbours and Occupiers of Adjoining Land.

The Planning Application Documents were made available to be inspected at Commonwood Fishery in the reception / café / shop and were available for the full duration of the publicity period.

In addition to the above a News Item was also posted upon the Holt Village Website <http://www.holtvillage.co.uk> together with a note on the Holt Village Facebook Page.

In excess of 8 weeks have been given for the receipt of any comments or Objections prior to the Planning Application being submitted – this significantly exceeds the statutory 4 week / 28 day Requirement.

No Objections or any detrimental comments have been received from any Consultee, neighbour, member of the public, local residents or Councillors. Several Letters of Support have been received and these accompany the Planning Application within the supporting documents.

5.00. 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

Please see section 7.00 for specific policies in support of the proposal

6.00. The Scheme (including Appearance Character, Design & Landscape Strategy etc)

- 6.01.** A Layout Drawing has been prepared illustrating the proposals - 1:500 scale CWF/2.1. This is based upon the latest available Ordnance Survey Data.

6.02. Landscaping

- 6.03.** The design is to create a very attractive low density curvilinear layout for the Lodges and Pods, located in informal groups and 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 and exclusive 5 star Holiday Fishing facility.

- 6.04.** 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.

- 6.05.** The holiday Fishing Lodges and Pods will be serviced from the existing access drive that leads off the public highway. Mains services will be provided to the site and construction would be undertaken over a short period to ensure minimal intrusion. Due to the nature of the proposals the ground works would be minimal and the Lodges are prefabricated timber units manufactured off site and delivered by lorry and sited in a matter of hours.

- 6.06.** The timber Pods and Lodges would be environmentally coloured in a range of muted colours to blend in with the natural environment. The Landscaping would be undertaken immediately to ensure that maximum time is available to establish the landscaping.

6.07. Layout

- 6.08.** A significant amount of for-thought and consideration has gone into the preparation of the layout plan. The units are all totally screened and together with the landscaping proposed would ensure absolutely no intrusion on the locality or neighbouring property. Part of the proposals is to establish supplemental indigenous planting belts within the new areas, which screens the proposals and creates an attractive and desirable environment.

6.09. Scale

- 6.10.** The type, style and quality of the Lodges and Pods 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.

- 6.11.** 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.

Figure 22. Proposed Layout Plan (please see accompanying larger scale A3 Plan).



7.00. Policy context and General Supporting Information.

- 7.01.** Below are reproduced the principal Policies and Guidance which are relevant and relate to such a development. A summary and how the proposals accord with these Policies is provided at para 7.24 within the Planning Policy Summary :

Government Policies and Guidance in support.

Planning Policy Wales (Edition 8, January 2016)

Chapter 7 Economic Development – relevant sections highlighted :

7.3.1 Many commercial and light manufacturing activities *can be located in rural areas without causing unacceptable disturbance or other adverse effects. Small-scale enterprises have a vital role in promoting healthy economic activity in rural areas, which can contribute to both local and national competitiveness. New businesses in rural areas are essential to sustain and improve rural communities...Local authorities should*

encourage the growth of self employment and micro businesses in rural areas by adopting a supportive and flexible approach to home working.

Chapter 7 also acknowledges that businesses in rural areas are essential to sustain and improve rural communities.

7.3.2 The expansion of existing businesses located in the open countryside should be supported provided there are no unacceptable impacts on local amenity.

7.6.1 Local planning authorities should adopt a positive and constructive approach to applications for economic development.

Chapter 11 Tourism, Sport and Recreation

11.1.1 Tourism is vital to economic prosperity and job creation in many parts of Wales. It is a significant and growing source of employment and investment, based on the country's cultural and environmental diversity. Tourism can be a catalyst for environmental protection, regeneration and improvement in both rural and urban areas.

11.1.4 Tourism involves a wide range of activities, facilities and types of development throughout Wales. The planning system should encourage sustainable tourism in ways which enable it to contribute to economic development, conservation, rural diversification, urban regeneration and social inclusion, recognising the needs of visitors and those of local communities. In addition to supporting the continued success of existing tourist areas, appropriate tourist-related commercial development in new destinations, including existing urban and industrial heritage areas, should be encouraged.

11.1.7 In rural areas, tourism-related development is an essential element in providing for a healthy, diverse, local and national economy.

11.2.1 Development plans should establish a strategic framework for the provision and enhancement of well designed tourism, sport, recreation and leisure facilities in the areas they cover. They should consider the scale and broad distribution of existing facilities and activities and provide for the accommodation and management of future needs

TAN 13 Wales - Tourism (Technical Advice Note – Wales - 13 October 1997)

4. Tourism comprises a range of different, but interdependent activities and operations which overlap with sport, entertainment, the arts and other recreation and leisure activities. It makes a major contribution to the Welsh economy, provides employment in a wide variety of occupations and can bring benefits to local economies and communities in urban and rural areas.

TAN 12 Wales - Design (Technical Advice Note – Wales - 13 October 1997)

It is considered that this proposal accords with the general thrust of the guidance contained within this document – please see **Policy Summary 7.24.**

The Wrexham Unitary Development Plan 1996 - 2011

7.02. The current Local Development Plan Policy principally consists of The Wrexham Unitary Development Plan 1996 - 2011

- 7.03.** This scheme relates to the Diversification of an existing Tourism and Leisure Attraction to provide Holiday Fishing Accommodation allied to the existing use of the site.
- 7.04.** The general thrust of the UDP Plan is that new development will, in principle, be supported provided that it meets the criteria of other policies in the Local Development Plan and material planning considerations.
- 7.05.** Below are reproduced the principal UDP Policies and Guidance which are relevant and relate to such a development. A summary and how the proposals accord with these Policies is provided at para 7.24 :

UDP extracts :

9.9 Good quality overnight visitor accommodation can provide opportunities for local jobs and benefits for local service suppliers and, in rural areas aid economic diversification. There is a general shortfall in accommodation locally.

9.10 Holiday and touring caravan and camping sites are an important part of the self-catering holiday sector, and can make a useful contribution to the rural economy.

Policy CLF7 advises that the development of the countryside for informal recreation will be permitted provided that it does not harm visual amenity or nature conservation interests. Built development (e.g. information centres, toilets and car parking) should be small scale and directly related to the use of the resource.

Policy CLF10 is permissive towards new touring caravan and camping sites provided that the site is unobtrusive and well screened without the need for additional strategic landscaping and the site is used for holiday purposes.

- 7.06.** This proposal at Commonwood Fishery has identified a Demand and the potential for an exclusive mixed use tourism attraction and holiday facility in this location. This will in turn boost the Local Rural Economy and enable the attraction to Diversify and enhance this existing family enterprise.
- 7.07. The Visitor Economy.** The Wrexham UDP recognises that The Visitor Economy encompasses a variety of elements that contribute to making a successful visitor destination, and specifically acknowledges the value that it provides to the Local Rural Economy, Employment and other visitor attractions.
- 7.08.** Historically, the failure to adapt has resulted in the tourism season being short and a high proportion of employment being seasonal and poorly paid. This is further justification for this scheme to proceed in that the Applicants have identified a specific niche within the Tourism Industry in this area which will expand upon and enhance the existing attraction and the product offered.
- 7.09.** In September 2009 the 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 :-
- 7.10.** *“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.”*

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

7.12. UK economic impact

7.13. 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

7.14. 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.

7.15. Visitor numbers

7.16. 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.

7.17. Direct staff numbers

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

7.19. Catalytic impacts

7.20. 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.

7.21. 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.

7.22. A recent study found that each holiday caravan (or Lodge) can produce annual spending in the local economy of more than £25,708 per unit and Holiday Pods / Touring can generate £15,156 per unit annually. On this basis this scheme would generate £387,536 for the local economy annually. Please see Appendix 2.

7.23. 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"

7.24. Planning Policy and Guidance Summary

7.25. The above Policies and Guidance are all particularly relevant to this proposal and demonstrate that the proposal is an acceptable form of development as it has taken account of, and meets the criteria of the above policies in that :-

- 1).** The proposals respects the site and its surroundings in that the proposed Fishing Lodges and Pods would be sited within an existing Tourism Attraction and in close proximity to existing settlements in the region and other built development. It is therefore visually related to the other development.
- 2).** The size and scale of the proposed Lodges and Pods are single storey units and subordinate in size and scale to the existing buildings and dwellings in the locality.
- 3).** The form, character, design, nature of materials, and muted colours of the proposed Lodges and Pods will compliment the existing Fishery / adjacent development and blend seamlessly into the natural environment.
- 4).** The units would not unacceptably affect any prominent public views into, out of, or across any settlement or area of open countryside.
- 5).** The proposed location of the Lodges and Pods takes full account of their location, contours and any minor changes in levels. The site is adjacent to existing buildings and structures within the fishery and adjacent farm buildings, and it is not prominent and not visible on any skylines.
- 6).** The proposed development would not affect the amenity of local residents, other land and property users or characteristics of the locality.
- 7).** It provides safe and convenient access for vehicular traffic, pedestrians, cyclists, and emergency vehicles together with adequate parking, services and manoeuvring space. There are no impacts on the wider Rights of Way network surrounding the site.
- 8).** The proposal is unlikely to have any material effect or unacceptable effect on the highway network.
- 9).** This proposal does not prejudice land or buildings safeguarded for other uses, or impair the development and use of adjoining land – agricultural or otherwise.
- 10).** The proposal satisfies physical or natural environmental considerations in that all services required including Mains Water, Electricity, Telephone and Foul Sewer Disposal are either existing services and available on site or can be provided. Any Refuse generated will be of a Household nature and full recycling facilities will be provided.
- 11).** Due to the proximity of the proposed Reception, Office and Manager's Lodge to the development and the access, the scheme therefore takes account of safety and security both on a personal level and community safety and security.

- 12).** The proposals are ancillary to an existing Tourism and Leisure Enterprise, and does not compromise or injury any Agricultural Land.
- 13).** The proposal is to continue to create an exclusive 5* Leisure Attraction with Accommodation.
- 14).** The proposal is sustainable and accessible to all means of Transport including access by walking and cycling, and it will support and extend the range of facilities on offer within the County.
- 15).** The scheme also accords with Policies relating to car parking in that Parking is available on site and it is sustainable in that it also enables access to public modes of transport.
- 7.26.** From the above it has therefore been demonstrated that the proposed Fishing Lodge and Pod accommodation at this existing Tourism and Leisure Attraction is in accordance with relevant Policies within the Local Development Plan and Regional / Government Policies and Guidance. Furthermore, it should be noted that innovative projects and facilities can significantly enhance the visitor economy and offer wide reaching benefits throughout the County.
- 7.27.** 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 Policies and Guidance of achieving sustainable development.

8.0. Summary of specific Special Reasons / Significant Benefits :-

- 1).** There is a significant and identified demand for quality, modern, exclusive Fishing Holiday accommodation in the locality and nationally - the proposal contributes to the lengthening of the tourist season.
- 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. (Please see **Appendix 2.** Industry Statistics demonstrating the level of spends & employment generation of benefit to the local rural economy).
- 3).** Other tourist attractions in the area would benefit from the proposals, and the proposal will be a major boost to Tourism Regeneration in the area.
- 4).** Schemes of this nature and in this location need to be encouraged.
- 5).** The proposed Holiday Fishing Accommodation will enable the existing Fishery to Diversify.
- 6).** The sites proximity to the main road network, footpaths and available public transport, encourages alternative modes of transport.
- 7).** 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 benefits proposed, the scheme does deserve to be considered for Approval.

Jonathan Moore Lambe 16th May 2017



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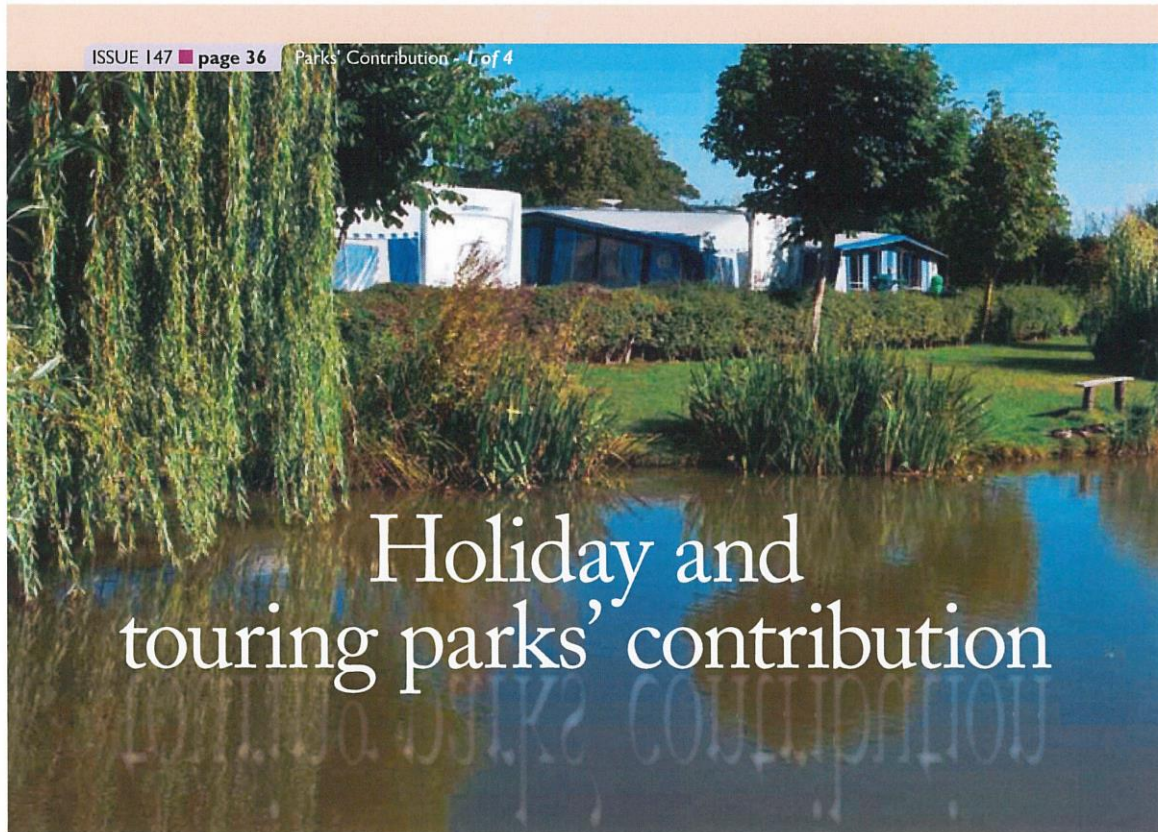
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Appendices :-

Appendix 1. A3 Layout Plan of the proposals – attached.

Appendix 2. Industry Statistics demonstrating the level of spends & employment generation of benefit to the local rural economy.

Appendix 2. Industry Statistics demonstrating the level of spends & employment generation of benefit to the local rural economy – article extract BH&HPA Journal



Councillors and officials drafting local authority policies and making planning decisions, and all politicians who decide the regulation of park business, should be left in no doubt as to the contribution of holiday and touring parks.

The Coalition Government's policies of 'localism' and 'Big Society' are devolving power to the local level. Local authorities are to be given a 'general power of competence', a wide mandate to do what they consider 'the right thing' for their local area. Going forwards, there will be far fewer targets and requirements from central government, local authorities are to be freed up to govern their local area as they see fit.

Such wide discretion may be a double-edged sword for park business, depending on the attitudes of the local authority and the local electorate. Recognition of the value of local parks could bring benefits, whilst ignorance or prejudice could achieve the opposite. It is essential BH&HPA members communicate their business contribution at every opportunity.

If the community does not recognise what they receive from their local park business, they can hardly be expected to support it. It is therefore essential that this contribution is communicated at every opportunity.

A park's contribution will be economic, social and environmental. **It will include:**

- the number of jobs that are sustained, both directly in the park business and indirectly in the locality
- the market created for local goods and services thereby supporting local businesses (shops, pubs, attractions. ... even bus services) which remain viable through the patronage of park customers
- trade (and employment) for local businesses that work on the park (tradesmen, suppliers, plumbers and electricians: all who trade with the park)

- on-park facilities, such as a shop or swimming pool, which are available for local users and whose absence would be sorely missed

- conservation and biodiversity work on the park and in its surroundings

- involvement in local causes and educational projects

- maintenance of environmental assets, such as footpaths and beaches.

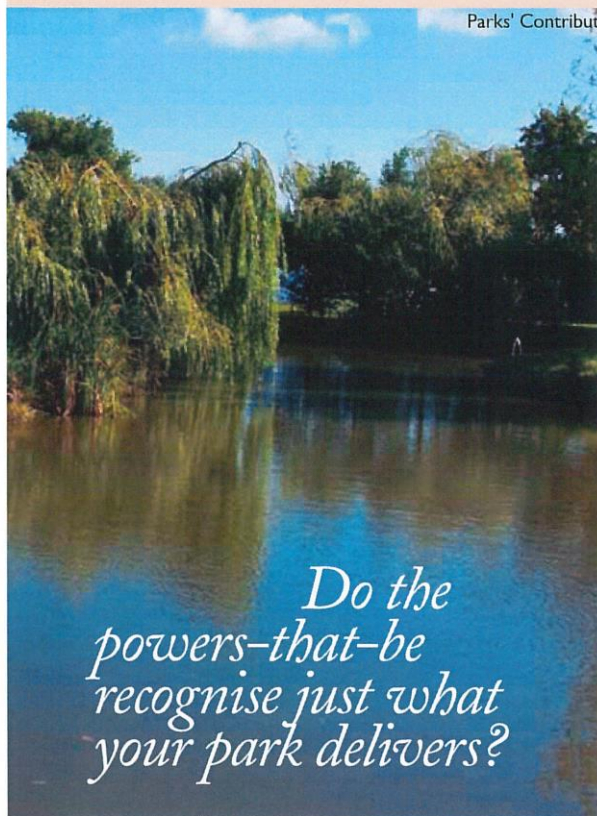
Making (and repeating) the case

It is important that park owners themselves recognise the changing political arena and create opportunities to engage with policymakers at the local level.

If business fails to engage at the local level, the vacuum that they leave will be filled by those with more time and perhaps some particular axe to grind. Single issue lobby groups can wield disproportionate influence if their fervour for an issue is not tempered with good common - and business - sense.

Local authorities' economic development departments will appreciate data to support their plans for the area, while local Destination Management Organisations and Local Economic Partnerships may need evidence of the integral role played by parks in defining tourism destinations and sustaining the local economy.

The case put for the industry by BH&HPA members will be more compelling if backed up by data from credible sources. The following pages provide some facts and figures regarding the holiday and touring parks industry which BH&HPA members can use to demonstrate the contribution of their parks, and tourism in general, to the sustainability of communities.



*Do the
powers-that-be
recognise just what
your park delivers?*

Holiday and touring parks' contribution

Tourist statistics

Over 50% of the British population take a park holiday in their lifetimeⁱ.

Tourism data are gathered by the United Kingdom Tourism Survey (UKTS) which recorded that in 2009, the parks industry accounted for:

Tourist nightsⁱⁱ

Park accommodation	Tourist bed nights	% of UK total
Caravan holiday homes - let	19,935,000	5%
Caravan holiday homes - privately-owned	15,948,000	4%
Touring caravans	23,922,000	6%
Camping	19,935,000	5%
Holiday camp	7,974,000	2%
Total parks industry	87,714, 000	22%

Tourist spendⁱⁱ

Park accommodation	2009 Tourist spend	% of UK total
Caravan holiday homes - let	£875,240,000	4%
Caravan holiday homes - privately-owned	£437,620,000	2%
Touring caravans	£656,430,000	3%
Camping	£656,430,000	3%
Holiday camp	£437,620,000	2%
Total parks industry	£3,063,340,000	14%

Economic contribution

Several studies have been undertaken.

Caravan holiday homes

A study in Wales indicates that each caravan holiday home generates spending of between £6,721 and £19,138 each year into the local economyⁱⁱⁱ.

2010 research^{iv} amongst caravan holiday home consumers who participate in the BH&HPA Rate This Park consumer panel indicates that the average spend per night for an occupied caravan holiday home pitch is between £78.62 and £122.42. (The study asked consumers about their spend on items such as accommodation, travel, car parking, groceries, eating and drinking out, activities, attractions, capital items and other shopping.)

The annual economic contribution can be calculated if pitch occupancy is considered:

Annual economic contribution per caravan holiday home pitch

Annual pitch occupancy	From £	To £
20 weeks	£11,007	£17,138
25 weeks	£13,759	£21,424
30 weeks	£16,510	£25,708

Touring caravans

The Camping and Caravanning Club places the average daily spend in the local community per touring pitch, excluding site fees, as £31.91^v.

2010 research^{vi} amongst touring consumers who participate in the BH&HPA Rate This Park consumer panel indicates that the average spend per night for an occupied touring pitch is £72.17. (The study asked holidaymakers about their spend on items such as accommodation, travel, car parking, groceries, eating and drinking out, activities, attractions, capital items and other shopping.)

The annual economic contribution can be calculated if pitch occupancy is considered.

Annual economic contribution per touring pitch

Pitch occupancy	£
20 weeks	£10,104
25 weeks	£12,630
30 weeks	£15,156

continued...



Direct employment

Considering employment across the industry, a 2010 report prepared by Oxford Economics for the British Hospitality Association, 'Economic contribution of UK hospitality industry'^{vii}, provided an assessment of the economic contribution of the core UK hospitality industry to the country's wider economy.

Two statistical classifications are particularly relevant to the parks industry:

SIC 2007 – 5530 – Camping grounds, recreational vehicle parks and trailer parks – defined as: 'Provision of accommodation in campgrounds, trailer parks, recreational camps and fishing and hunting camps for short-stay visitors, provision of space and facilities for recreational vehicles and accommodation provided by protective shelters or plain bivouac facilities for placing tents and/or sleeping bags'.

SIC 2007 – 5520 – Holiday and other short-stay accommodation – defined as: 'This includes the provision of accommodation, typically on a daily or weekly basis, principally for short stays by visitors, in self-contained space consisting of complete furnished rooms or areas for living/dining and sleeping, with cooking facilities or fully equipped kitchens. This may take the form of apartments or flats in small free-standing multi-storey buildings or clusters of buildings, or single storey bungalows, chalets, cottages and cabins. Very minimal complementary services, if any, are provided.'

'Economic contribution of UK hospitality industry' reported direct UK employment in these classifications as follows:

	Direct employment 1998	Direct employment 2010	% change 1998 to 2010
Camping grounds, recreational vehicle parks and trailer parks	19,000	29,000	+53%
Holiday and other short-stay accommodation	45,000	50,000	+11%

Of particular note is the 53% rise in direct employment on holiday parks over the 12 years to 2010.

Research carried out in Wales^{viii} has resonance across the UK. Key findings of this research included that average number of staff employed on parks was 20 in low season, with this figure more than doubling in high season.

Indirect employment

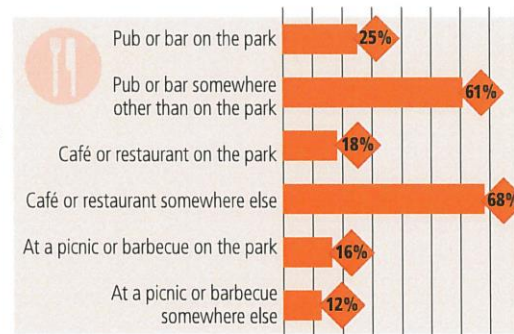
A 2001 study reported that every two caravan holiday home pitches account for one tourism job^{ix}.

The Camping and Caravanning Club research^x confirmed the wide range of activities pursued by visitors surveyed. These included:

- visiting the local pub (58%)
- eating in local restaurants (52%)
- visiting other tourist attractions (68%).

Park customers eating out

Park consumers who participated in the BH&HPA consumer panel in 2010^{xi} were asked if they ate out during their park holiday; the majority (68%) had purchased meals from restaurants in the area local to the park.

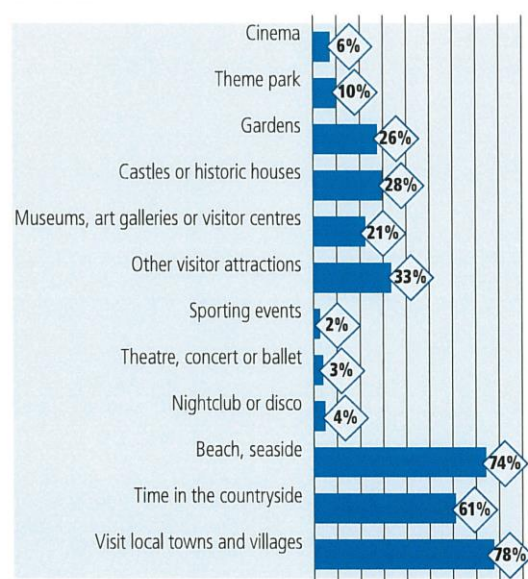


Nearly two-thirds of park holidaymakers who participated in the BH&HPA consumer panel said that they spent money buying clothes, gifts or other shopping during their holiday. Items such as clothes or gifts accounted on average for nearly £45 of each park holiday group's expenditure.

Spend by park customers on non-food shopping



The same study highlighted park customers' support of local attractions.



In addition to park customers' support of local attractions, hospitality and retail businesses, parks employ numerous tradesmen and local businesses to support their work, from plumbers and electricians to construction and horticultural companies, waste contractors to accountants and IT providers.

Caravans: a UK manufacturing industry

It is not only direct and indirect tourist spend that sustains local economies; caravan holiday home and touring caravan manufacturing businesses, their suppliers and service providers are also important job and wealth creators.

With so few manufacturing industries having survived the economic tribulations of the last 50 years, it is important to emphasise that the parks industry sustains this important manufacturing sector. The overwhelming majority of lodges, caravan holiday homes, touring caravans and motorhomes sold on the domestic market are of UK manufacture.

The National Caravan Council publishes industry production figures from manufacturers' data, confirming production totals for the last three years as follows^{xii}:

UK touring caravan sales

2007-2008	29,266
2008-2009	20,135
2009-2010	25,114

UK caravan holiday home sales

2007-2008	20,153
2008-2009	12,931
2009-2010	17,308

Sources

- i 59.5% of the UK population stated that they had 'ever spent' a camping/caravanning holiday. 'Camping & Caravanning' research conducted for the European Commission by GfK Marktforschung GmbH & Co.KG (1989)
- ii United Kingdom Tourist Statistics 2009. www.tourismtrade.org.uk
- iii RPI from October 2003 to October 2009 applied to figures derived from 'Caravan Holiday Homes in Wales', The Tourism Company 2003, Wales Tourist Board and BH&HPA
- iv December 2010, BH&HPA research amongst the Rate This Park consumer panel
- v RPI from October 2007 to October 2009 applied to figures derived from 'Spend in the Local Community Summary Report', Camping and Caravanning Club - Easter and Summer Results 2007
- vi December 2010, BH&HPA research amongst the Rate This Park consumer panel
- vii 'Economic contribution of UK hospitality industry', Oxford Economics, September 2010. www.bba.org.uk/wp-content/uploads/2010/10/BHA-Economic-Contribution-of-UK-Hospitality-Industry-Final-.pdf
- viii 'Caravan Holiday Homes in Wales', The Tourism Company 2003, Wales Tourist Board and BH&HPA
- ix 'Holiday Parks - Your value to the local community', Ian Butter, BH&HPA Journal, March-April 2001
- x 'Spend in the Local Community - Summary Report', Camping and Caravanning Club - Easter and Summer Results 2007
- xi 'Economic Contribution', December 2010, BH&HPA Research Report for the Rate This Park consumer panel
- xii 'The Business', National Caravan Council, Winter 2010