

**THE ROLLBACK OF
CARAVAN AND
HOLIDAY HOME PARKS
FROM THE ERODING
EAST YORKSHIRE COASTLINE**

FINAL REPORT

TO

THE EAST RIDING OF YORKSHIRE COUNCIL

BY

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Summary

- S.1 This study seeks to assist in achieving some of the aims of the East Riding of Yorkshire's Integrated Coastal Zone Management Plan (ICZMP). Together, aims CP3, TO6 and LA2 encourage:
- “rollback” and relocation as a response to the threat of coastal erosion;
 - opportunities for providing assistance; and
 - the development of planning policies to facilitate this.
- S.2 **Chapter 2** of the report sets out the project method and programme. The first task was to identify those sites at risk, and assess them. Sites at risk are, for the purposes of this study, those which are under threat from erosion within the next 100 years. Site assessment included interviews with the owners / operators, or questionnaires where necessary. **Site Profiles can be found in Appendix A.**
- S.3 **Chapter 3** provides some context of the area's constraints and characteristics, including:
- a) **Coastal Erosion** – Rates of erosion vary from year to year and from place to place. Periods of rapid erosion (over 5m per year) can span several years, but may be followed by much slower spells (0.5 – 1.0m per year). Single events, often linked to storms, may result in a cliff retreat of 6 – 9m. Other factors producing localised variations include proximity and relationship to coastal defences. Whilst these local factors are important, it is important to appreciate the broad picture over a longer timescale. Overall, over the next 100 years, the length of coast from Barmston down to Atwick is likely to erode at an average annual rate of approximately 1.0m per year. To the south of Hornsea, down to Kilnsea, the average annual erosion rate over the same 100 years is likely to be somewhat higher, at approximately 1.5m per year.
 - b) **Landscape** – The landscape of the majority of the East Riding coast (the Holderness Plain) is distinctive, though relatively uniform and heavily influenced by intensive agriculture. The main change occurs where this gives way to the landscape of the Humber Estuary in the south, including the Spurn Heritage Coast area. The main finding of this study for landscape issues is that, in general terms, there is considerable potential to absorb tourism development, in the form of caravan and holiday home park rollback and relocation without a major deterioration and effect on character. Whilst landscape issues are important considerations, the area lends itself well to effective screening, and there are often potential benefits to be gained from replacing cliff-top sites with newer, better designed schemes a little further inland.
 - c) **Biodiversity** – There are a number of designated nature conservation sites on the East Riding coast, some of which are of international importance. It is fair to say that in between these sites, relatively little is recorded about habitats and species occurrence, though there is a recognised need to restore biodiversity.
 - d) Other important factors include water quality and the protection of cultural resources of the area, such as archaeological remains.
- S.4 **The general characteristics of the caravan and holiday home park industry** on the East Riding coast are also described in Chapter 3, informed by the initial Site Profiles and interviews. The main points are:
- i) The industry is very important in economic terms to the area;

- ii) Most units are privately owned, with very few available for weekly rent;
- iii) There is considerable variation in the characteristics of the sites studied, and the markets they serve.

S.5 Some sites are very small, with few services, whilst others are very large and contain substantial infrastructure and facilities provided for visitors. Individual sites differ in the amount and standard of landscaping, services and entertainment; the size of the pitches; and in the age and condition of the caravan units themselves. Site owner investment levels vary greatly, as do the sums paid by caravan owners for their units.

S.6 The study has identified the following **as the main financial considerations** associated with the rollback of caravan sites on Holderness:

- **New site acquisition** – There may be problems of land acquisition for current ‘at risk’ site owners. Suitable land simply may not be available for sale; and in other cases owners may seek prohibitively high prices based on hope value, notwithstanding that it often be arable farmland with little potential in planning terms for alternative development. Land purchase issues are likely to be a particular problem for smaller operators.
- **New pitch and Infrastructure provision** – Today’s visitors to the East Riding coast are more demanding in terms of quality than used to be the case, purchasing bigger units which require larger pitches. Many visitors also expect greater distances between units, internal site landscaping, and the provision of a range of services as a matter of course. This is likely to require substantial investment, and in turn, often leads to the need for additional land just to accommodate the same number of units – which can exacerbate the land acquisition problems identified earlier.
- **Marketing of new pitches to new or retained tenants, and loss of rental income during periods of site transition** – Improved sites and the investment required will often mean that rents have to be raised. Also, older units may not move without deterioration, requiring further expenditure by their owners, which some may not be willing to make. On top of this, some customers will not be prepared to experience the disruption caused by relocation or rollback – both the change of surroundings and factors such as construction activity. As a consequence, owners are likely to experience a drop in income, and have to put significant effort into marketing the new site to a fresh clientele.
- **Removal of coastal defences and reinstatement of the vacated ‘at risk’ sites** – Removing concrete bases and services, demolishing redundant service buildings, and reinstating land so as to provide even a basic level restoration is a significant additional cost of relocation which is likely to be incurred. Where a vacated site has been previously protected by private coastal defence works, any requirement for their removal is likely to substantially raise these costs.
- **Professional assistance** – Owners may need professional advice related to land purchase, planning, site restoration and engineering to remove sea defences. These may form a significant percentage of the overall costs of rollback and relocation.

S.7 Closely linked to the financial implications of rollback and relocation are **phasing** and **multipliers**. Allowing an extended period for a site rollback or relocation project can sometimes soften the financial burden and risk incurred by site owners. At the same time there is a need to ensure that there is not an unreasonable or harmful length of time from the start of a project to its completion and the securing of benefits. Careful **phasing** should address both. It is also important to consider whether there is a need to expand the site, involving **multipliers for area and pitch numbers**. A greater area of land may be needed to accommodate larger pitches, more extensive landscaping and achieve other quality improvements. At the same time, the total number of pitches on the new site may need to be greater – otherwise it may not be possible to generate new income to repay the capital

investment required, especially if significant infrastructure is involved. The precise combination of multipliers and phasing which is justified and acceptable is likely to site-specific. For some sites significant multipliers would be needed to achieve rollback; for others, merely an extended relocation period would suffice.

- S.8 **Chapter 4** reviews the current policy framework for the consideration of rollback and relocation of caravan and holiday home parks. Support for this study can be found in a variety of policy documents. These include strategies for sustainable development such as the UK Government's Strategy, and the Regional Sustainable Development Framework, as well as the ICZMP which has provided the impetus for this project. They also include national and regional planning guidance (in PPG20, PPG21 and RPG12), the regional and local economic development strategies, and the East Riding of Yorkshire Community Strategy. The national and local Biodiversity Action Plans are particularly important in relation to the restoration of vacated sites. Together, this body of advice stresses the need to integrate the different economic, social and environmental strands of sustainable development when seeking to accommodate the requirements of tourism development affected by coastal erosion.
- S.9 Policies in the two statutory adopted local plans for the coastal zone do seek to address issues for tourism development in general, caravan parks in particular, and development affected by coastal erosion. Some encouragement is given to rollback, especially in the East Yorkshire Plan. However, as the ICZMP has recognised, these policies are in places inconsistent between the two areas. They could be made more flexible, effective and pro-active in seeking sustainable development gains. This will require subtle but important changes in wording and emphasis if significant rollback is to actually occur.
- S.10 **Chapter 5** recommends a new **policy** with separate **guidance** as a framework for making planning decisions related to caravan park relocation and rollback. A number of options for introducing this into the statutory town and country planning system are discussed, in the context of the current development plan review timetable. The recommendation is to publish the policy as an **alteration to both of the local plans**; and at the same time consult on the guidance as **formal Supplementary Planning Guidance**.
- S.11 In terms of the overall approach of the new policy framework, the main recommendation is that it should use a "**balance sheet**" approach to sustainable development gains and losses – if the balance sheet is positive, and net benefits would be accrued, then the development should be allowed to go ahead. This is because the decision to be positive and pro-active towards rollback has already been taken, and the next task is to ensure that sustainable proposals can find a way through the planning system. Where there is a positive balance sheet, refusal on a single issue should only occur where there are very clear reasons for doing so.
- S.12 The **suggested policy in section 5.3** attempts to take on board the information and analysis from the preceding chapters. It is designed to be consistent with the generally **restrictive stance towards development in the open countryside and the coastal zone** already in the development plan – the policy will only apply to sites at risk from coastal erosion. At the same time, the policy is **positive towards helping those sites to roll back or relocate**. It uses a **timescale of 100 years** for the assessment of risk, and requires that none of the resultant new site (existing and extended) would be at risk within that period when permitted.
- S.13 Other important criteria for obtaining planning permission include:

- a) **Removing coastal protection works** – though the guidance makes it clear that this may not be feasible where those works also protect other development or assets
 - b) **Site clearance and restoration**, with an emphasis on nature conservation and public access enhancements
 - c) **Phasing of proposals** over an acceptable timescale
- S.14 **Rollback and relocation** (including a form of **pitch-banking**) are allowed for by the policy, and the terms are distinguished and defined in the guidance. Further, the policy indicates that **pitch and area multipliers** may be acceptable, as long as they can be justified; and indicates the other issues which proposals should seek to address: landscape character, improvements in quality and design, traffic, and effects on settlements and residential amenity. **Flexibility** is important if schemes are not to be prevented by the use of rigid policy limits which ignore wider considerations. For this reason, no such limits are recommended in policy.
- S.15 The **suggested guidance in section 5.4** builds on the “bare bones” of the policy, to explain the line which the Council is likely to take with development proposals. It sets the context for the positive approach (including the ICZMP) and coastal erosion, and broadly explains the planning background. Different wordings are suggested, in case the Council wishes to pursue a different option to the plan alteration route.
- S.16 The positive approach is carried through into the sustainable development factors likely to be considered, seeking to encourage developers to grasp opportunities for gains and enhancements, and incorporate them into their schemes. At the same time, where appropriate, the guidance expresses caution regarding the potential harm of new or extended sites. This is carried through into guidance on limits and multipliers; a range of figures are quoted as “**benchmarks**” against which proposals will be judged, rather than as strict and rigid thresholds.
- S.17 **Chapter 6** advises where the focus for **grant assistance** might help to implement the policy framework recommended in Chapter 5. Whilst grants will inevitably assist private businesses to deal with coastal erosion, at the same time it can help to secure wider public benefits – including the maintenance of the economic contribution of the site. In reality, the **size of grant aid is very unlikely to facilitate the relocation or rollback of all 24 sites** identified as being at risk by this study. Indeed, it is **likely to be a major financial consideration for only a minority**, due to the scale of sums involved; and it would be unwise to seek to subsidise otherwise unviable projects. **Positive use of policy, especially phasing and multipliers, is more effective** as a way to help businesses to improve quality and maintain viability.
- S.18 The recommended approach is to direct grant assistance towards those aspects of rollback and relocation schemes which would realise the greatest level of tangible, “**value added**” public benefits. Candidates for this include the removal of sea defences; securing public access; biodiversity gains through site restoration and management; improvements in the standard of landscaping to new sites. Grant aid should be given as a proportion of those costs – normally 50%.
- S.19 Finally, **Chapter 7** takes three case studies, and examines these sites in more detail, in the context of the suggested policy framework. Potential solutions are explored.
- S.20 **Case Study 1** involves the relocation of the Beach Bank cliff-top site at Ulrome (total 90 pitches) as an extension to Top View Caravan Park (currently 92 pitches) nearby, with a 10% (1.1) pitch multiplier to compensate for the loss of site buildings at Beach Bank. This

has substantial potential sustainable development benefits, in addition to removing one of a group of cliff-top sites whilst keeping the business viable. These include the removal of some coastal protection works which are in a relatively poor state of repair; moving pitches to a site with lower densities and well established advanced screen planting; upgrading of units; fewer touring caravans on the local road network.

- S.21 A planning application was supported by officers, but elected members deferred a decision, pending to the completion of a legal agreement relating to the phasing of the scheme, relating mainly to site reinstatement and concerns over the period of construction activity and associated traffic. Members sought a reduction in the timescale for the works, but this raises financial difficulties for the site owner if he is to complete the works in a compressed period without losing business in the meantime, especially with relatively little by way of a pitch multiplier. Due to this, and awaiting the findings of this Study, the application has not been determined at the time of writing.
- S.22 On examination of the case, this study concludes that concerns over the proposed phasing programme and timescale appear to be outweighed by the potential sustainable development gains from a well-designed scheme. It is recommended that prompt action is taken to complete the legal agreement, grant planning permission, and possibly offer of grant assistance towards the restoration of the Beach Bank site and removal of coastal protection works. An additional recommendation is that a comprehensive strategy is drawn up for the managed rollback / relocation of the concentration of sites at Skipsea / Ulrome, without which the policy aims of the ICZMP will not be fully realised in this area.
- S.23 **Case Study 2** involves Sand le Mere, close to the hamlet of Tunstall, a relatively long-standing and large site of 467 static and 20 touring caravans. Largely due to its age, the site has a rather regimented layout with relatively small pitches, without major structural landscaping, and is fairly prominent in views from the south. Substantial infrastructure exists, much of which is likely to be threatened by coastal erosion in the medium term. These include a sewage treatment plant - which benefits from a recent planning permission for operations including coastal protection works – swimming pool, entertainment and shopping facilities. Seaside Road which leads to the site is also under threat; and there is a beach access, connecting to public footpaths which cross the site. Another important factor is the adjacent Tunstall Drain, which is currently protected by the Environment Agency from coastal erosion, but may be a subject to a managed retreat in the future.
- S.24 The site owner has not ruled out rollback, but favours a whole-site relocation as being likely to create the best balance of costs associated with infrastructure relocation, land purchase, borrowing and transition of business, when set against potential income from a new site. Even then, the owner estimates a need for a pitch multiplier of 1.4 – 1.5; which together with larger pitches and space for improved landscaping and other improvements gives rise to a site area multiplier of 1.75.
- S.25 On the plus side, there are substantial potential benefits to be gained from a new site, including biodiversity and landscape gains from site reinstatement, linked to public access enhancements, removal of coastal protection works, and integration with retreat of the Tunstall Drain. Some of these aspects could give rise to the sort of wider public benefits suitable for grant assistance. These could be combined with a relatively rapid turnaround, as the owner aims to construct a new site over one year, and relocate in a single off-season period.
- S.26 There is also some potential to create a new higher quality site with better screening. However, whilst a new site with overall benefits may be feasible, the nature of the topography within 1.5km of the current site is such that satisfactorily accommodating this

into the landscape may prove challenging. It is recommended that early talks between the owner, planning officers from East Riding of Yorkshire Council and the Environment Agency explore options nearby; but move rapidly to focus attention on potential sites further afield if major obstacles arise at an early stage.

- S.27 **Case Study 3** involves the Sandy Beaches site at Kilnsea, which occupies a former military camp at the northern end of the Spurn peninsular. It is likely that all of the current site - which currently accommodates 160 static and 20 touring caravans – will be lost to coastal erosion over the next 100 years, including some buildings and a water treatment plant at a relatively early stage.
- S.28 The key constraint here is the Spurn Heritage Coast status, which demands that any development must be accommodated in accordance with the aims, purposes and management strategy for the designation. If any proposal for rollback and relocation is to be successful, it must not only minimise adverse effects on the landscape character, settlement, biodiversity and cultural resources of the locality; but should actively seek to integrate with and provide benefits for those factors. In practice, this means that careful site selection, phasing, design and screen planting would be needed, with an attention to detail and close co-operation with other stakeholders to gain as much support and consensus behind a scheme as possible. Multipliers are likely to be low, given these sensitivities.
- S.29 Despite these sensitivities and potential obstacles, the study has identified a number of sustainable development benefits which could be achieved. These include biodiversity gains in progressively restoring the coastal site, linking in with the existing wildlife-rich area at the northern end. Public access could be improved and formalised, providing connections with other biodiversity sites in the Heritage Coast; and the visitor experience could be further enhanced if a new site reception could be combined with a public information facility. Removal of some of the unsightly buildings on the site – following recording of their historical interest features where necessary – could also improve the appearance of the area. Finally, the water treatment provision – which currently discharges on to the beach - might be improved.
- S.30 Accommodating a new site or a rollback area would not be a straightforward task. However, although options are likely to be limited, they do exist. Well thought out screening proposals, enhancing existing landscape features, limiting caravans to lower ground, and creating a buffer from Kilnsea hamlet are all factors which could create an acceptable site with net gains over the existing one.
- S.31 The site owner favours a progressive rollback process, minimising disruption and financial risk. Given low multipliers and the need to provide high quality landscape screening, this approach appears well suited to this site.

1. Introduction and Background to the Study

- 1.1 This study stems from the Integrated Coastal Zone Management (ICZM) Plan. That document seeks to bring together a range of issues, other plans and strategies in a set of policy aims. The brief for the project specifically referred to policy aim CP3:

“To encourage “rollback” as a response to erosion for all forms of development, where appropriate.”

- 1.2 It is the case that the ICZM clarifies that managing coastal change, presenting alternatives to protecting assets through hard defences, is perhaps the best way forward. However, there are many other policies which are relevant, most notably TO6:

“To encourage businesses at risk from erosion to relocate where appropriate, and to investigate opportunities for providing assistance in this.”

and LA2:

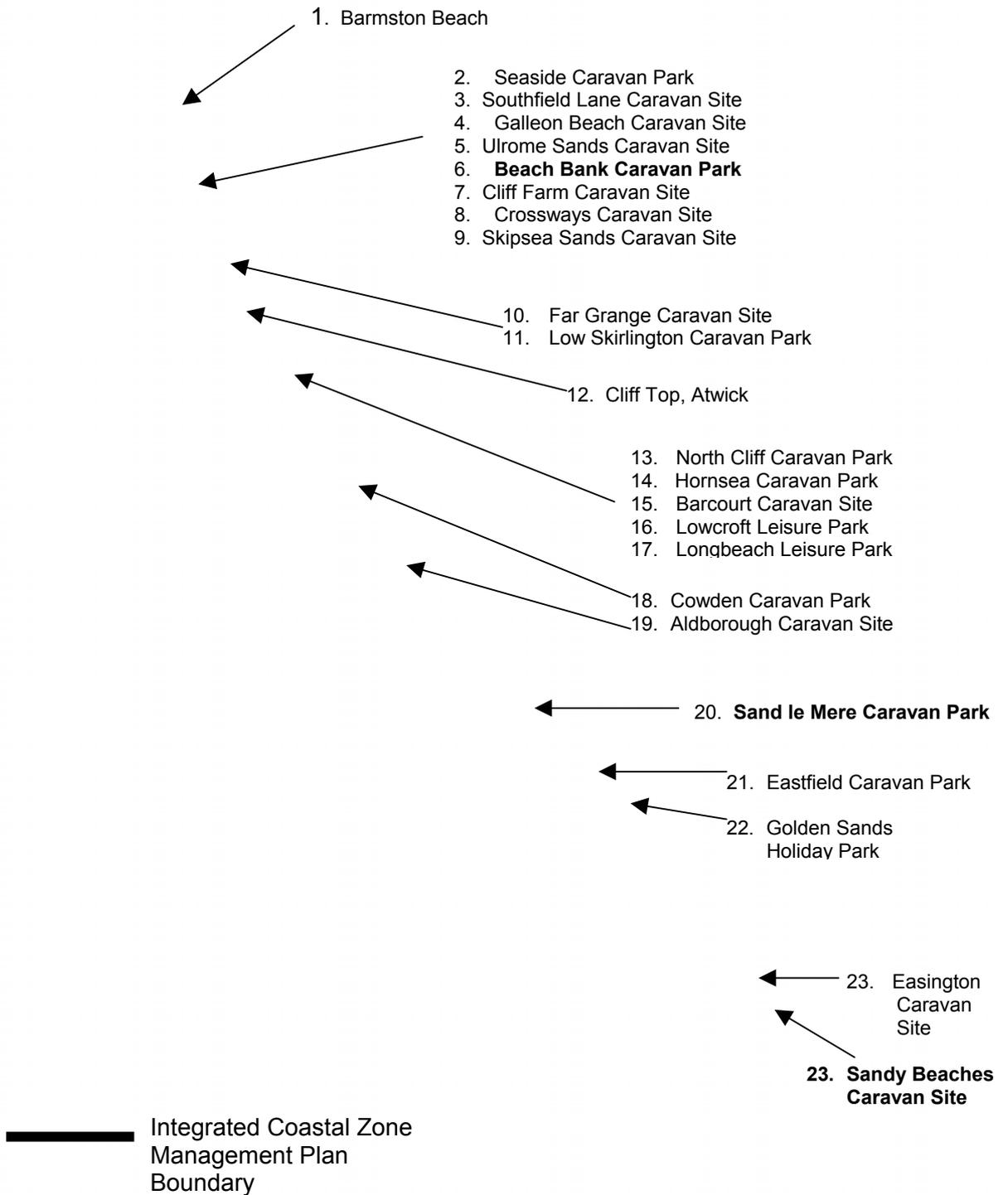
“To ensure that the development plan review properly considers the need for clear and consistent policies to enable relocation of infrastructure and property at risk from erosion, where appropriate.”

- 1.3 The study seeks to assist in achieving those policy aims, and others in the ICZMP, by
- examining the main issues for the caravan industry, in the context of the East Riding coast (Chapter 3);
 - broadly assessing the caravan and holiday home park sites affected (Site Profiles in Appendix A);
 - examining the existing policy framework within which the caravan and holiday home park industry operates (Chapter 4);
 - suggesting new policy and guidance (Chapter 5);
 - advising where the focus for public grant assistance might help to implement those policies (Chapter 6);
 - studying some sites in more detail in the context of the suggested policy to explore the potential for solutions.

2. Project Method and Programme

- 2.1.1 The proposal accepted by the Council for this study is contained in Appendix D. As the study has progressed the authors have reported to a Steering Group organised by the Council. Essentially, the study has comprised a number of elements.
- 2.1.2 Following an initial meeting with Planning and Sustainable Development officers from the Council, a list of caravan and holiday home park sites potentially at risk was prepared, from a much longer list of caravan sites in the Coastal Zone. All sites behind coastal protection works at Hornsea and Withernsea were discounted. Next, all sites clearly not at risk from coastal erosion – usually in excess of 300m from the cliff edge – were also discounted. Finally, some sites were not investigated further because, although within 300m of the cliff, they are located in an area immediately north of hard defences, where the erosion rate has been stable and relatively low for some time.
- 2.1.3 The remaining sites, shown on Figure 1, have been visited, and discussions held with the owners or site managers. Only six out of the 24 sites could not be dealt with in this way, and were contacted with a questionnaire, to which 5 responded.
- 2.1.4 Initial site profiles have been prepared, providing an overall information base and context for the study, and are set out in Appendix A. Six of these were also shortlisted as potential subjects for the Case Studies, and put to the second Steering Group meeting.
- 2.1.5 Further investigation and extensive meetings with the owners of the Case Study sites and relevant Council Officers, have led to the material presented in Chapter 7.
- 2.1.6 In parallel with these elements of the study, and indeed informed by them, the main issues facing the caravan site industry on the East Riding coast have been identified and put into context (see Chapter 3); and the current planning policy and other strategies have been analysed (Chapter 4).
- 2.1.7 All of the above contextual information has informed the conclusions and recommendations for policy and guidance in Chapter 5, and for the principles offered on the possible use of grant assistance in Chapter 6.
- 2.1.8 All of the assessments of risk for current sites and potential rollback or relocation sites are based on a broad judgement of whether there is a threat from erosion over a 100 year period. That length of time has been chosen because:
- it is long term – an important element of sustainable development is to be forward looking, and
 - it is not so long term that individuals cannot envisage it affecting successive generations, such as grandchildren.
- 2.1.9 The timetable for the study has since altered from that set out in Appendix D. The first meeting with officers of the Council took place on 16th April 2003, and on the same day a presentation was made to the Coastal Forum, to inform a wider audience that the study was taking place.

**Figure 1 : Location of the 24 sites
identified as being at risk within the
next 100 years**



- 2.1.10 The first meeting of the Steering Group was set back until 20th May 2003, which delayed, but did not entirely postpone, initial fieldwork. The second Steering Group meeting was held on 9th June 2003, at which it was decided to pursue three, rather than two case studies; but to approach them a modified way.
- 2.1.11 The original deadline for the final report became the deadline for submission of the draft report, 30th June 2003. This was circulated to Steering Group members, and comments invited. A third, originally unscheduled meeting of the Steering Group was then held on 14th July 2003, which discussed amendments to the report, and agreed that the final version would be submitted by 31st July 2003.

3. Main Issues

3.1 Introduction

- 3.1.1 The context for this study is a recognition that the caravan industry on the East Yorkshire coast is of significant importance to the sub-regional economy; and that the loss of business income through coastal erosion and a restrictive planning regime is an issue of some concern.
- 3.1.2 However to enable a full appreciation of the multiplicity of factors and characteristics at play on the Holderness coast and within the caravan industry itself, the following contextual assessment of the current situation is offered.
- 3.1.3 Roll-back of caravan sites and holiday parks from the zone at risk from coastal erosion could have a range of sustainability benefits. These should include increased security for businesses, improved quality of tourist provision (leading to greater competitiveness), and a reduction in the likelihood of future demands for coastal protection works. Also, it may be possible to reduce the impact of these sites on the sensitive coastal fringe, with associated restoration of vacated sites leading to biodiversity, access and recreation enhancement opportunities.

3.2 Coastal Processes

- 3.2.1 Erosion on the East Yorkshire coast is an important part of the nation's wider coastal processes. It is land-hungry, occasionally dramatic and above all inevitable. The picture from Barmston down to Kilnsea in the south is one of rapid erosion, and most of the shoreline is retreating inland. The overall rate of erosion is among the highest for any stretch of coast in Europe, and evidence suggests that it has been going on since at least Roman times, and indeed since the last Ice Age. Many settlements have been lost to the sea over that time.
- 3.2.2 In general, there appears to be little relationship between erosion rates on the one hand, and cliff height or variations in the particular composition of glacial material making up the cliffs on the other. Of more importance appear to be the influence of man-made coastal defences placed along the shore. These tend to achieve their objective of slowing or ceasing erosion along a particular stretch of coast. This may also lead to the formation of a bay on the northern side, where the beach extends a little, and both cliff erosion and sediment transport are slowed. This may contrast with the situation immediately to the south of the protected area, where increased rates of erosion can occur. In addition, the overall supply of sediment from protected stretches of coast to important tourist beaches and natural features 'down stream' may be diminished. Thus there is a complex pattern of impacts due to coastal protection works on nearby land - a very local sustainability issue, whereby development seeking to protect one asset may have detrimental effects on adjacent assets. This affects the "level playing field" on which natural processes would otherwise act along the coast.
- 3.2.3 Rates of coastal erosion can vary greatly between different locations, over successive years, and in relation to particular storm events. Individual records of 6m – 9m retreat following a single event have been made.
- 3.2.4 However, it is possible to make some generalisations and predictions for the future, even given the uncertain effects of variables such as sea level rise and other effects as a result of global warming. The following figures have been obtained through discussions with coastal engineers in the East Riding of Yorkshire Council Operational Services Department. Over the next 100 years, the length of coast from Barmston down to Atwick is likely to erode at an

average annual rate of approximately 1.0m – 1.5m per year. To the south of Hornsea, down to Kilnsea, the average annual erosion rate over the same 100 years is likely to be somewhat higher, at approximately 1.5m – 2.0m per year. This gives a general guide to assessing the rates of erosion at the sites in this study, depending on their location.

- 3.2.5 In the ICZM, the general principle seems to have been widely accepted that for a rapidly eroding coastline such as Holderness, the most sustainable approaches to development will tend to be those which work with, rather than resisting natural coastal processes.

3.3 Environmental and Cultural Assets

Landscape character of Holderness

- 3.3.1 Holderness is an intensively farmed, low lying landscape, forming a broad, flat or gently undulating plain running south to Hull, and bounded by the North Sea to the east, the Humber Estuary to the south and the dip slope of the Wolds to the north and west.
- 3.3.2 The gentle terrain relates to its glacial history. The deposits of glacial till and alluvium, which cloak the underlying Chalk strata, create generally rich soils which support intensive arable cultivation. Fields are generally large to medium, and tree and woodland cover relatively sparse. As a result the landscape is open with long views where the sky is a dominant feature in any view.
- 3.3.3 The inland, agricultural landscape is separated from the North Sea by a line of soft clay cliffs and as a result the proximity of the sea is scarcely apparent except along the coastal fringe above the cliffs.
- 3.3.4 Although the character of the landscape is broadly uniform, there are variations which result from modest changes in topography, in the level of tree cover and in the nature of settlement and land use. The strip of coastal farmland running from Withernsea to Bridlington is perhaps the most clearly distinct area. It is gently undulating land, rising up towards the sea, and is predominantly in arable cultivation. Holiday homes, caravan parks, wind-pruned trees and evidence of coastal erosion are key characteristics of this coastal zone.
- 3.3.5 The rest of the Holderness landscape consists of open arable fields on flat or gently undulating land with large, hedged fields, some hedgerow trees and copses and scattered settlement. In the southern part field boundaries are often drainage dykes.
- 3.3.6 There is evidence to suggest that when the first settlers arrived in Holderness, in Neolithic times, the plain was generally very wet and probably consisted of a mix of lakes, islands, marshes and woodland. The land became drier as sea level changed, trees were progressively cleared, and land was drained, helping to make the area more suited to settlement. The land remained relatively enclosed, with a pattern of dispersed farmsteads set apart from the villages, and areas of large to medium sized regular rectangular fields enclosed by thorn hedges.
- 3.3.7 Settlement in Holderness is usually on higher ground and is often surrounded by smaller fields than those in the more distant agricultural areas. Hamlets and villages are widely dispersed, with some being closely knit and nucleated while others are more linear and strung out along roads. Many have a particularly attractive character with a variety of buildings grouped around ponds and village greens. Church spires in villages are prominent landmarks. Farmsteads are usually large and widely dispersed, combining old brick farmhouses (brick making in England began in this area) with large modern farm buildings. Near the coast the distinctive 'cobbles'

of Holderness appear, particularly in churches where boulders from the coastal boulder clay has been combined with brick. Modern buildings in the area often have little in common with the local vernacular.

- 3.3.8 Semi-natural vegetation has largely been lost as a result of agricultural intensification, and now only small fragments remain. Marshland and meres were historically very common but now Hornsea Mere, Yorkshire's largest natural lake, is the only sizeable surviving example. Some unimproved neutral grassland still occurs on the boulder clays and a number of quarries and sand and gravel pits are of ecological importance.

Landscape character of the Humber Estuary

- 3.3.9 Between the landscape of Holderness to the south of Withensea and the River Humber lies the landscapes of the Humber Estuary. The waters of the estuary itself provide the focal point of the landscape, and around it is a terrestrial landscape of very low lying, flat agricultural farmland, urban and industrial development and some notable natural habitats.
- 3.3.10 Kilnsea lies at the northern end of the Spurn peninsula where the enclosed farmed fields contrast sharply with the exposed, wind blown dunes and sand and shingle beaches along the spit, and the coastal mudflats and other wetland and coastland habitats.
- 3.3.11 Most of the flat farmland is artificial, formed by the draining and reclamation of salt marshes from the sea. It is fertile arable land, generally open and exposed with large, expansive, regular rectilinear fields with boundaries formed by dykes, drains and embankments.
- 3.3.12 Evidence suggests that in the Bronze Age the land surrounding the estuary was an area of extensive reed swamp edged with a wooded fringe of lime, oak and alder carr. Those living in the drier settlements were able to exploit the surrounding rivers, creeks and meres and gradually clear woodland to allow summer grazing of the marshes.
- 3.3.13 Parliamentary enclosure produced the regular, geometric fields enclosed by hedges as well as dykes, and also introduced some of the same type of brick built isolated farms found to the north in Holderness. Settlement has traditionally been restricted to drier land at a slightly higher altitude and villages and hamlets lie mainly in the adjacent area of Holderness. Where more traditional buildings do occur the pattern of red brick and occasionally cobbles in buildings near to the coast continue the pattern in Holderness.

General Points about Landscape Impact

- 3.3.14 In general, the authors of this study consider that there is considerable potential to absorb tourism development, in the form of caravan and holiday home park rollback and relocation, into the landscape without a major deterioration and effect on character. This is not to say that landscape issues are not important; nor that poorly designed proposals would not be rejected on those grounds. Rather, the nature of the landscape, in general terms, lends itself well to effective screening; and that there are benefits to be accrued through replacing some cliff-top sites with newer, better designed schemes a little further inland. This is an important general point.

Water quality

- 3.3.15 Water related issues are relevant to this study. Most land drains to the west, and there are low-lying areas of land, which may need to be protected from flooding by the sea.
- 3.3.16 In addition, infrastructure such as sewerage outfalls from settlements and caravan sites need

to be of a high standard, and may need works to protect them from the sea. There are eleven EC Designated Bathing Beaches along the coast from Flamborough to Withernsea, which are an important element of the local environment which supports the tourist industry. Additionally, there is a local inshore fishing industry, as well as off-shore fishing.

Biodiversity

3.3.17 English Nature has identified Natural Areas for England which present coherent units of land with similar distributions of wildlife, natural features and land use patterns. These Natural Areas do not respect administrative boundaries, but are closely linked to the character of the landscape and its history of human interference. In the Study Area, there are three natural areas:

- The Humber Estuary Natural Area;
- The Holderness Natural Area; and
- the Bridlington to Skegness Maritime Natural Area.

3.3.18 There are a number of important nature conservation sites in the parts of the Coastal Zone covered by this Study which receive statutory protection under UK law. These are:

- Hornsea Mere - SPA
- Humber Flats, Marshes and Coast SPA and Ramsar site (including Spurn Head and the Lagoons SSSI); and
- the Humber Estuary pSAC - and the Lagoons pSPA/Ramsar site)

3.3.19 All of the above international sites are also SSSIs, and the national designated area in some cases extends beyond the international boundary. Additionally, there are the following SSSIs:

- Dimlington Cliff (Geological)
- Withow Gap SSSI (Geological)
- Skipsea Bail Mere SSSI (Geological)

3.3.20 Spurn Head is also a National Nature Reserve (NNR).

3.3.21 In addition, there are locally designated areas which, although not benefitting from statutory protection, have been identified as possessing significant nature conservation interest, worthy of protection from development in most circumstances.

3.3.22 Beyond identified sites, the study area contains other biodiversity interest - including habitats and features of the landscape which are important for wildlife, especially those which act as corridors for movement and dispersal, connecting different areas. These make the value of the whole greater than the sum of its parts, helping a wide range of species to survive, including species protected by the Wildlife and Countryside Act 1981 as amended by the Countryside and Rights of Way Act 2000. Habitats such as hedgerows, unimproved grassland etc can be found in a variety of places within the study area, and so might be affected by development.

3.3.23 At present it is fair to say that relatively little is recorded about these more general features, habitats and species occurrence, compared to some other parts of the country. However, it is equally fair to say that the need to restore and enhance the biodiversity resources of the area, much of which has been affected by intensive agriculture, is widely recognised.

Cultural Heritage

- 3.3.24 The study area contains important historic buildings, but we are not aware of any which are likely to be affected by caravan rollback or relocation. The Shoreline Management Plan identified which of these need to be considered in terms of the implications for coastal protection works - ie if not protected, they will be lost to the sea. However, heritage guidance refers to their study before loss, rather than employing protection measures.
- 3.3.25 A second tier of non-statutory cultural heritage features exists in the form of archaeological resources on the Sites and Monuments Record, and identified locally important buildings. This is addition to the value placed on the more general character of local villages and countryside, reflecting the settlement pattern and local vernacular.

3.4 The Characteristics of the Industry

- 3.4.1 As acknowledged above, the caravan site industry on the Holderness coast is particularly significant to the sub-regional economy. It creates directly many jobs in an otherwise remote rural area, attracts visitor expenditure within the area, and helps support indirectly other local industries such as the caravan construction industry which is concentrated in the East Yorkshire area.
- 3.4.2 Within the sector the scale and standards of the constituent caravan site businesses varies enormously. This study has concentrated on 24 sites which are at significant risk from coastal erosion processes, and within that sample the characteristics of the industry are diverse (see appendix A, site profiles).
- 3.4.3 The great majority of the many thousands of caravans sited in the Holderness area are privately owned units which occupy a 'pitch' (connected to a varying level of mains services) on a park owned and maintained by a business receiving a ground rent. A very small proportion of the overall number of units are available for holiday rental. Many sites bar owners from sub-letting. In effect, most units act as a second, or holiday home, visited by the owners for long periods or on many occasions throughout the year. Many owners take pride and care in the condition and immediate environs of their unit.
- 3.4.4 There are a number of sites which have clearly been subject to lower levels of investment and maintenance than others. Generally there is a correlation between poorer standard sites and size vis-à-vis the number of units; but this is not always the case. The smallest site within this study has less than 10 pitches and very low levels of amenity on the site. However at the upper end of the scale, some sites accommodate many hundreds of units and provide extensive and modern entertainment, recreation and convenience services in heavily landscaped settings. In between the extremes there is a great variation in the service levels and pitch standard provided by the parks, and likewise a variation in the age and condition of the units sited thereon.
- 3.4.5 There are clearly niches within the market which different businesses have focused on. Highly serviced sites with 'intensive' recreational facilities such as bars, function areas, swimming pools and amusement arcades tend to attract tenants with families. Other sites however, and this is not necessarily correspondent to size, have developed a more relaxing and low key ambience which tends to attract older people.
- 3.4.6 Some sites will stipulate in their terms of rental that units beyond a certain age must be replaced or removed, although this is not applied elsewhere. Modern units at the top of the range are over 30' by 12' in size and can cost well in excess of £25,000. Elsewhere there is clear evidence that much older and smaller units are in poor states of repair. The coastal

climate and exposure by cliff edge units to salt spray means that the life span of units can be radically reduced if not constantly maintained. This can also have a bearing on site relocation, as older caravans may be relatively water-tight when left in place; but tend to deteriorate and leak when moved.

3.5 Economic Issues

- 3.5.1 This study is, in part, stimulated by a realisation of the significant importance of the caravan industry to the East Yorkshire economy. In the light of such an acknowledgement it is also essential that the economic realities of businesses within the industry are understood and appreciated as being the primary drivers for action or otherwise by the site owners.
- 3.5.2 In seeking to realise the objectives of the ICZMP, the economic implications of a planned retreat of cliff top caravan sites will have to be factored into the equation which also covers environmental and community issues, and the way in which the planning policy framework evolves to be able to assimilate these considerations.
- 3.5.3 The study has identified the following as the main areas of expense associated with the rollback of caravan sites on Holderness. They are:
- New site acquisition
 - New pitch and Infrastructure provision
 - Marketing of new pitches to new or retained tenants
 - Loss of rental income during periods of site transition
 - Reinstatement of the vacated 'at risk' sites.
 - Professional Assistance

Site Acquisition.

- 3.5.4 Anecdotal evidence from discussions with 'at risk' site owners has established that a degree of 'land banking' has occurred across Holderness on sites obviously appropriate for site expansion or relocation. Elsewhere, the phenomena of 'hope value' by existing owners has been experienced when site acquisition interest is muted, inflating the prices attached, normally to arable farmland otherwise with little potential for development in planning terms. To smaller operators the feasibility of purchasing such sites is seen as being unrealistic given the potential viability of the scale of their operation. As such, some site owners are of the opinion that they have, quite literally, 'nowhere to go'.
- 3.5.5 This study does not attempt to expand in any detail on the complexities of land valuations associated with new or expanded caravan site identification. However, it is clear that site acquisition for current 'at risk' site owners may be financially prohibitive in many cases.
- 3.5.6 To compound this problem, as standards of caravan sites are being raised (see below), and the dimensions of individual modern mobile homes have grown significantly since many of the at risk sites were originally licensed, and the density at which they are laid out is significantly less than the 25/acre maximum as determined by the Control of Caravans Act 1960. Likewise, modern landscaping schemes are also land hungry. The implication of these factors is clearly that more land is required to site the same number of caravans than on the existing at risk pitches, further increasing the cost demands of new site acquisition.

New Pitch and Infrastructure Provision

- 3.5.7 One of the objectives of the economic strategy for the Holderness coastline is to bring up the quality standards associated with caravan site relocations. This seeks to achieve an enhanced perception of the industry as a quality service provider and professionally run industry, with the aim of raising the level of visitor spend and investment in the area by site tenants.
- 3.5.8 This is manifested in many ways, but has specific ramifications for the density of sites, the size of caravan pitches and the level of other entertainment and convenience facilities available on site. The implications of this are clear. Firstly the size and service connections to individual pitches, the internal road layout, site lighting and quality landscaping have increased their cost to the developer to between £3,000 at the basic level, up to £9,000 at the very top of the market. Clearly, even for a very small site relocation of say 30 pitches, would cost at the very least £90,000, but more typically twice as much, just in site creation.
- 3.5.9 For larger, more intensively provisioned operations, the cost of facilities such as swimming pools, bars and convenience facilities would be on top of those basic costs.

Marketing of New Pitches to New or Retained Tenants

- 3.5.10 Relocation in particular, but also roll-back of pitches is likely to involve the significant upgrading in the standard, of the new site in comparison to the vacated one, and hence be reflected in increases in ground rents. Such upgrades will be likely to result in a loss of some of the exiting tenants of the caravan sites who are currently occupying older units on smaller pitches, in more dense layouts and are unwilling or unable to locate on the new sites. There are a number of sites characterised by older units in higher density layouts where this could be an issue.
- 3.5.11 As a consequence, it cannot be assumed that the creation new sites at a higher standard than the vacated ones will be immediately rented by the existing clientele. It is probable that a large proportion of such developments would be taken by completely new custom. At the time of this study the market for higher quality pitches on Holderness is strong, but this may not always be the case. New or rolled back site owners must therefore actively market their product.
- 3.5.12 This has cost implications for the site owners as well as reduced rental incomes during times when not all pitches are generating income.

Loss of Rental Income During Periods of Site Transition

- 3.5.13 Similar to the loss of income through vacant new pitches before they are let, site owners will be likely to experience a period of transition between creation of new pitches on the sustainable site, and the removal and restoration of old pitches on the cliff top, when there is a net drop in the number of pitches generating rental income.
- 3.5.14 Unless sites are moved wholesale, or the clearance and restoration of the old site does not commence until the new site is fully operational, this will result in a drop in site income during a period of substantial capital outlay.

Reinstatement of the Vacated 'At Risk' Sites

- 3.5.15 This aspect of the rollback project is perhaps the most obvious aspect of how there will be a net sustainable benefit achieved through rollback and relocation. The restoration to developed, often degraded cliff top land to a semi-natural condition, which brings landscape, biodiversity and natural coastal process benefits, does however come at a price.

- 3.5.16 Most static pitches constitute a concrete base with some level of mains services attached. These will normally include waste/sewer pipes, mains water supply and electricity supply. Upper end quality pitches may also have mains gas connections. All such services and bases would need to be removed from the site without further damage to the cliff and beach condition in order to meet with appropriate reinstatement conditions or Section 106 Agreements. Whilst there is the potential for the reuse of crushed bases as secondary aggregates for the new sites, this will probably only be economic for larger sites where many pitches are to be removed, offering economies of scale which afford the heavy plant hire necessary.
- 3.5.17 In most cases there are at least service buildings or entertainment facilities located on sites at risk. Removal of such substantial buildings will incur further costs to site owners. The most substantial costs however are likely to be incurred through the removal of sea defences where these have been built and maintained privately. In addition to their very scale and bulk, extra care must be exercised in their removal to ensure proper protection of the beach itself and the earth against which they have been constructed.
- 3.5.18 Whilst yet to be seen in practice, smaller levels of financial out-goings may be associated with the aftercare of vacated sites, which may be controlled by conditions of a planning consent or legal agreement.

Professional Assistance

- 3.5.19 From the outset, any proposal for significant financial and land use planning proposals such as a caravan site relocation project would be likely to involve the use of professional assistance to facilitate the process, particularly through the formal planning application stage. Other areas where a site manager or owner may benefit from professional advice would be with regard to specialist restoration works, such as sea wall removal, habitat restoration or the marketing of new pitches. Whilst perhaps less onerous than other aspects of site relocation expense, in combination the payment of professional fees can be nevertheless significant, and disproportionately so for small schemes where lower numbers of pitches are to be relocated, but where similar levels of professional involvement are required.

Overall Cost Implications for Rollback and Relocation

- 3.5.20 Therefore, despite potential long term public and private interest advantages, it can be clearly seen that the process of a planned retreat of caravan sites from the Holderness coast can only occur at significant financial costs in the short term.
- 3.5.21 For each site undertaking rollback or relocation, there will be a very large capital outlay and loss of income to be incurred over the transitional period. Without question, the economics of such proposals are prohibitive to small sites operating at the lower end of the market. Nevertheless, these are still sites in need of removal or relocation if ICZMP objectives such as the avoidance of significant cliff and beach degradation are to be realised.
- 3.5.22 Notwithstanding land acquisition costs, the relative costs to the larger, higher quality sites where rollback (in its purest sense) is proposed, are perhaps less prohibitive given their economies of scale, but the actual sums involved will be very significant indeed.
- 3.5.23 This study's investigations have revealed that within the industry two main business driven approaches which seek to address problems of the viability of relocation and rollback schemes have emerged.

Phasing of Proposals

- 3.5.24 'Phasing' of the relocation to new sites seeks to soften the financial burden and risk incurred by site owners who undertake a site relocation project. By extending the period of creation

of the new site (construction of the new pitches, site infrastructure, landscaping), and implementing a rolling programme for the removal of units from the cliff top pitches, the financial costs of the operation are spread and effectively lessened. This allows for the loss of income in the period between there being units removed from the old site and establishing tenants within the new site to be absorbed over a longer time, and for capital investment within the new site and restoration of the old to be supplemented by continuing income from both old and new units. To remove all the old units and create the infrastructure of the new site in one short period is both financially onerous, and results in a real net drop in pitch income until all new units are established and let. Likewise, the construction of a new site in a single season would require a much more intensive and disruptive programme of works, probably carried out by larger contractors with such capacity, where as a phased construction can be carried out most within the close seasons (avoiding disturbance to other tenants) and be carried out by site operators and their established staff, at a more cost effective rate.

Multiplier Factor

- 3.5.25 This approach involves the application of a 'multiplier factor' on the number of new pitches provided vis-à-vis the vacated pitches. Here, the economies of scale of pitch provision are improved, and the potential revenue generated thereafter increased. This of course, would result in a net increase in the number of caravans located on the Holderness coast, and a greater area of land required to do so.
- 3.5.26 Whilst strongly promoted by some site owners, this technique has not been seen as being essential to other operators, including those who have carefully looked into the feasibility of site relocation. Elsewhere the size of the multiplier deemed necessary to make the scheme viable varies considerably with examples muted as low as 3:2, but up to to 4:1! This variation may reflect the different scale and standards of operation present across the Holderness coast, but may also indicate the difference in profit margins expected across the range of businesses studied.
- 3.5.27 There are however, examples of where such techniques are not proposed or expected to be necessary. However, in these cases, such as a proposal with a very short a phasing period, or with a very low ratio multiplier can be seen to have particular individual circumstances demanding or allowing a slightly different approach. For example, where essential infrastructure serving the whole site is threatened by coastal erosion it may be economically essential that a shortened time scale be taken to relocate the whole site in one tranche. Similarly, where the availability of land for rollback has been acquired without significant inflation in land values, possibly through existing ownership by the operator, the economic demand for increased number of pitches vis-à-vis the old site may be reduced.
- 3.5.28 However, it is very likely that some degree of multiplier *and* phasing will be an economic necessity of any successful proposal to relocate an at risk caravan site on Holderness. This economic reality will need to be embraced by the planning policy framework which will be developed to addresses the issue of rollback.

4. Policy Background

4.1 Introduction

- 4.2.1 The analysis in this section concentrates on the current national, regional and local planning policy framework. However, as that framework (and the guidance proposed as a result of this study) evolves, it has to integrate effectively with other relevant plans and

strategies. These other plans and strategies deal with a range of issues such as sustainability, economic development and biodiversity; and are also at the national, regional and local scale.

4.2 Sustainable Development

4.2.1 In 1987 the World Commission on Environment and Development, chaired by Mrs Gro Harlem Brundtland, published a report, *Our Common Future*, provided a definition of sustainable development which is probably the one which is most widely accepted to this day.:

"development that meets the needs of the present without compromising the ability of future generations to meet their own needs."

4.2.2 Other parts of the Brundtland Commission Report provide explanation of this wide-ranging definition, suggesting that there is:

"the possibility of a new era of economic growth, based on policies that sustain and expand the environmental resource base"

4.2.3 The principles of sustainable development underpin international, national and regional policy, right down to the local level in documents such as the Integrated Coastal Zone Management Plan. The approach to and policies for caravan rollback in this study are being developed in accordance with the principles of sustainable development.

4.2.4 The UK Government's own approach and interpretation of sustainable development is contained in "**A better quality of life: A strategy for sustainable development for the United Kingdom**" (1999). The strategy has four main aims:

- social progress which recognises the needs of everyone;
- effective protection of the environment;
- prudent use of natural resources; and
- maintenance of high and stable levels of economic growth and employment.

4.2.5 The core message is that there is a need to integrate the three main elements of sustainability into our decision-making: social, economic and environmental considerations.

4.2.6 At the regional level, "**Advancing Together: Towards a Sustainable Region - The Regional Sustainable Development Framework for Yorkshire and Humberside**" (February 2001) provides an overarching framework for the Regional Planning Guidance and the Regional Economic Strategy, as well as providing the context for more local strategies and initiatives.

4.2.7 Connections between economic development and environmental assets are highlighted, including those relating to the tourist industry. Aim 14 (out of a total of 15 in the framework) identifies the need for land use policy to develop:

"... strategies and responses to inter alia managing increased rates of cliff erosion...."

4.2.8 The "**East Riding of Yorkshire Local Agenda 21 Plan**" (January 2001) does not specifically address issues related to coastal erosion, but does:

"encourage and promote the sustainable use and management of land" (aim 6); and

"promote sustainable economic growth, which increases employment opportunities and supports the local economy" (aim 11).

4.2.9 Highly relevant to an analysis of policy for sustainable development along the East Riding coastline is the Council's "**Towards a Sustainable Coast**" – the **East Riding Integrated Coastal Zone Management Plan** (June 2002). This has been the trigger for this study, and has already been discussed in Chapter 1.

4.3 National Planning Guidance

- 4.3.1 In terms of this study, the two most important items of national planning guidance published by the UK Government are "**PPG20: Coastal Planning**" (1992) and "**PPG21: Tourism**" (1992). Other PPGs (eg PPG9: Nature conservation and PPG14: Development involving Unstable Land) are relevant to some extent, but often cross-refer to these two when addressing coastal and tourism issues.
- 4.3.2 As a basis for reconciling economic development requirements with the need to protect, conserve and improve the environment of coastal areas, **PPG20** identifies four broad types of coast (para 2.1), three of which are relevant to this study: undeveloped coast of landscape value and nature conservation interest; other undeveloped or part developed coast; and developed coast.
- 4.3.3 Relatively small lengths of the East Riding coastline fall into the category of "developed coast" – the major settlements of Bridlington, Hornsea and Withernsea, together with the nationally important gas terminal at Easington. It is no coincidence that most of the frontages of these lengths of coastline have hard sea defences.
- 4.3.4 PPG20 advises that, as a general rule, development which does not require a coastal location should not be located on the undeveloped coast (2.10). Clearly, the coastal caravan sites which are the subject of this study satisfy the "*require a coastal location*" test. The developed coast will normally be seen as the preferred location for development, even where a coastal location is required. However, whilst the undeveloped coast "*...will seldom be the most appropriate location*", it is not ruled out; and for the caravan and holiday home parks in this Study, the developed coast is rarely an option.
- 4.3.5 Of the remainder, the vast majority of the East Riding coast comes under the category of "other undeveloped or part developed coast".
- 4.3.6 Connections between environmental issues and socio-economic concerns, including the tourist industry, are highlighted at several points.
- 4.3.7 The guidance emphasises that special policies apply to specifically designated areas, including those which exist on the East Riding coast: the Spurn Heritage Coast, SPAs, NNR and SSSIs. PPG20 deals with Heritage Coasts in paragraphs 1.16 – 1.17; and 4.15 – 4.16. It emphasises that they are locally defined, non-statutory designations, with an emphasis on balancing access and conservation requirements. Conservation and heritage in this context covers natural beauty, biodiversity, architectural, historical and archaeological interest where they occur and are important in any particular area. PPG20 identifies the conservation, protection and enhancement of the coast as the first of four main objectives for Heritage Coasts, in so far as that is consistent with the recreational, sporting, tourism and educational needs and opportunities of the area; and with the environmental health of beaches and inshore waters. All of this must promote sustainable development, by taking account of social and economic needs of coastal communities,

businesses and activities such as agriculture. Clear policies for Heritage Coasts in development plans are advised.

- 4.3.8 Heritage Coast designation is seen in PPG20 as “...a flexible management tool for balancing the requirements of conservation and access in the coastal zone” (para 1.16). There is a reliance on designations to protect particular areas (2.4), but PPG20 does warn against a tendency to concentrate development in the remainder, to the detriment of the environment (2.6). Emphasis is also placed on the need to consider the cumulative effect of smaller developments, as well as large proposals; and indirect environmental effects or areas more remote from the development in question (2.5; 4.1, 4.3).
- 4.3.9 PPG20 is clear on the issues of locating new development in areas at risk from coastal erosion, and a precautionary approach to policy making is advised:
- “The policy in these areas should be to avoid putting further development at risk.”* (para 2.13).
- 4.3.10 Paragraphs 2.22 – 2.25 deal with the potential for environmental improvement, including through removal of eyesores, access and interpretation provisions, and restorative measures. These appear relevant to situations on the East Riding Coast where improvements to the environmental quality of caravan and holiday home parks can be achieved through rollback or relocation.
- 4.3.11 **PPG21** takes the guidance for tourism development in coastal areas on from PPG20. It stresses four main issues (see paragraphs 1.1 - 1.5 and 2.4 - 2.6), all of which are relevant to the objectives of this study:
- Tourism makes a major contribution to the economy of both the UK as a whole, and in local areas in particular (also see paras 3.1 – 3.9);
 - Tourism is often heavily dependent on a high quality environment, which the tourist industry therefore needs to maintain and where possible enhance (also see paras 2.5 and 5.26);
 - The need to have a flexible approach to new tourist development;
 - The need to tackle the adverse effects of existing attractions and activity
- 4.3.12 Future priorities include “balancing the needs of visitors, host communities and the environment”; and “improving quality and value for money” (para 3.10; also see para 3.11). Of particular relevance is the guidance on holiday and touring caravans in Annex B, which stresses their economic importance. Advice on new sites includes guidance that they “... should not as a rule be allowed immediately by the sea, but should be set back a short distance inland” Although this is for landscape and visual impact reasons, it is also relevant to coastal protection and process considerations (para 7). A flexible approach is also a strong theme in para 8.
- 4.3.13 Supplementary Planning Guidance is encouraged to address specific aspects of tourist development; but it is stressed that this still needs to be in the context of a proper development plan policy framework (para 4.16).

4.4 Regional Planning Guidance

- 4.4.1 **Planning Policy Guidance Note 11: Regional Planning** contains a specific chapter on The Coast. Chapter 11 promotes the:

"....sustainable and environmentally sensitive land use planning of the region's coast as a whole and of sub-regions along it ..., with an emphasis on protecting the biodiversity, natural character, built environment, and landscape quality of the coast" (para 11.04).

- 4.4.2 PPG11 goes on to propose the use of monitoring targets and indicators, which for the coast include enhancing biodiversity; natural character and landscape quality; and minimising development along the undeveloped coast. Policies for rollback could assist in meeting the some of these, but clearly care would have to be taken to ensure that new caravan and holiday home park development did not impair the others.
- 4.4.3 RPG 12 ("**Regional Planning Guidance for Yorkshire and Humberside**", October 2001) is the broad scale, strategic planning document which all development plans (structure, local and unitary) for the region should accord with. The RPG seeks to integrate the main themes of sustainable development. There is a high priority on regeneration in the EC Objective 2 area, including support for tourism. However, this is only in the context of maintaining the environment for which people visit the area.
- 4.4.4 In connection with the management of the East Coast and Humber Estuary, Coastal policy R1 states that:

"In preparing their development plans, local authorities should ensure that their policies are consistent across and around the Humber Estuary for managing the estuary and its flood plain, for enhancing natural and historic environmental assets, and reducing flood risks.

Strategies should be prepared by the Environment Agency and others for responding appropriately to natural coastal and estuarine processes in the expectation of rising sea level, including the possibility of managed realignment and the identification of protection works in selected cases utilising input from the Humber Estuary Shoreline Management Plan.

Co-ordinated management mechanisms should be established between national conservation agencies, local authorities and others to inform development plans and gain effective integrated management of the coastal and estuarine zone."

- 4.4.5 Although issues surrounding coastal erosion are contained within this policy, it is difficult to relate this specifically to caravan rollback and relocation.

4.5 The Shoreline Management Plan

- 4.5.1 The Humber Estuary Coastal Authorities Group published the Shoreline Management Plan (SMP) in April 1998. It sets out preferred options for coastal defence along the stretch of coast which includes the Study area. These can be described as follows:
- an overall approach of 'do-nothing' in areas which are not currently protected - allowing coastal erosion to continue to cause retreat of the shoreline; and
 - 'hold the line' where there are important existing protection works at the settlements of Bridlington, Withernsea, Hornsea, Mappleton, as well as the nationally important and Easington Gas Terminal – thereby maintaining the current position of the coast.
- 4.5.2 Concerns surrounding these preferred options have meant that the SMP has not been

formally adopted by the Council, though other bodies have accepted its findings and used it as working guidance tool. The main concerns relate to the cost benefit analysis (the former MAFF Flood and Coastal Defence Project Appraisal Guidance) and selection procedures, which were felt in some quarters to be inequitable, did not incorporate issues of socio-economic importance adequately, and may not have struck the correct balance to assist sustainable development. The SMP review has recently commenced.

- 4.5.3 The relevance of the SMP to this study is that, even if the document is changed as a result of the review, it appears unlikely that the preferred options will alter the situation significantly in respect of the majority of the caravan and holiday home parks examined. For sites behind existing hard defences at Hornsea and Withernsea, protection will remain and it is not necessary to consider rollback in the foreseeable future. For the remainder, it is assumed that the policy will remain one of no new hard defences against coastal erosion (“do nothing”). The possible exceptions to this may be where sites are currently on the margins of hard defences, which might be included in extensions.

4.6 The Development Plan

- 4.6.1 The East Riding of Yorkshire Council is a unitary authority. Prior to its formation in 1996, a two-tier system operated in the area. The Council has therefore inherited an adopted statutory development plan which in the coastal zone consists of:

- a Structure Plan (covering the former Humberside County Council area), providing strategic policies; and
- two local plans – the Holderness District-Wide Local Plan (“HDLP”, April 1999) in the south, and the East Yorkshire Borough-wide Local Plan (“EYBLP”, June 1997) in the north.

- 4.6.2 The Council is in the process of producing a new Structure Plan for the area, jointly with Kingston upon Hull, and has recently published a Deposit Draft (April 2003). In due course, the local plans will be replaced by a Local Development Document, rather than a single local plan, assuming that the Government’s proposed reforms of the development plan system contained in the Planning and Compulsory Purchase Bill become law.

- 4.6.3 **The Humberside Structure Plan Replacement** was adopted in 1987, and seeks to provide strategic guidance to the year 2011. In general terms, the strategy has been for economic development to emphasise regeneration and diversification, including in rural areas, focusing this in and around existing settlements (see policy E2).

- 4.6.4 Policy for coastal tourism development is contained in E10. This is encouraging to tourism development which can demonstrate additional economic activity, generation of income to the area, and benefits to the local community as well as tourists. The Structure Plan cross-references to policy En21, which encourages the provision of informal recreation developments such as picnic sites, footpaths and cycle routes, including those in coastal locations. The need to maintain open stretches of coastline is seen as particularly important.

The Local Plans

- 4.6.5 In the coastal areas, the local plans seek to concentrate new development in the towns of Hornsea, Withernsea and Bridlington. The main issues for the coastline as a whole are

highlighted as the need to accommodate tourism development – recognised as vital to the local economy - in a sustainable way. The relevant policies for the two plans are set out in Appendix B, side by side where equivalents exist.

- 4.6.6 In line with PPG20, the local plans describe categories of coast within a defined Coastal Zone. These are the conserved coastline (the Flamborough Head Heritage Coast and the Spurn Heritage Coast); developed coast (Bridlington, Hornsea and Withernsea); and the undeveloped coast (the greater part of the coastline – referred to as the Holderness Plain in the EYBLP). All of these categories are relevant to caravan and holiday home parks within the coastal zone; but only policies relating to the undeveloped coast and the Spurn Heritage Coast are relevant to the sites at risk from erosion covered by this study.
- 4.6.7 Both plans have a series of policies which set up a framework for dealing with caravan and holiday home parks at risk, with a number of “layers”. These start with general policies for all types of development in the countryside or the coastal zone as a whole, and for tourism development in general. More specific policies deal with all caravan parks, whatever their location; and with all types of development in the undeveloped coastal areas. Then there are policies which address caravan sites within the specific coastal areas.
- 4.6.8 In addition there are policies which deal with other issues which may be relevant to the rollback and relocation of caravan and holiday home parks, but on a site-specific basis. These include, for instance, policy R13 of the HDLP, which promotes the maintenance and improvement of the public rights of way network. A site rollback proposal could seek to provide new access for the public, and thereby demonstrate a sustainable development benefit in line with this policy, as a way of partly offsetting less beneficial aspects of the proposals in other respects.
- 4.6.9 For both plans, policies for caravan site development cannot be divorced from policies related to coastal erosion and protection works.

Holderness District Local Plan

- 4.6.10 This plan has no overall countryside policy, but does contain general policies such as G3 – G6 to set the scene for environmental protection. Policy Env5 addresses all types of development in all parts of the coastal zone, with six criteria, mostly related to coastal erosion, flooding, natural processes and protection.
- 4.6.11 There is a more specific policy to protect the undeveloped coast - Env8 – which prohibits all built development within 30m of the cliff edge; and most between 30m and 200m, though “temporary” development would be allowed. Even beyond 200m, Env8 endorses the approach of PPG20 in requiring proposals to be justified by the need for a coastal location. Cross-reference to the need to comply with Env5 is contained within the policy. Only extensions and conversions of existing buildings, plus open land uses would be allowed (also see policy Env9).
- 4.6.12 The limits in Env8 are quite prescriptive. The basis for the 200m figure is argued in the text as stemming from an average rate of erosion along the coast of 1.5m – 2.0m per year, giving 100 years of security. This is clearly consistent with the approach of this study.
- 4.6.13 There is a further suite of policies in the tourism chapter. Tm1 sets the overall tone, encouraging new and improved tourist facilities in settlements. A more guarded approach is taken outside of those areas, and the policy sets out the Council’s stall in respect of what it would have regard to: namely transport and accessibility; nature conservation, residential amenity, and settlement and landscape character; impacts on agriculture; and access to

the coast and countryside.

- 4.6.14 It is policies Tm4 to Tm7 which deal specifically with caravan and holiday parks. Tm4 lists a set of criteria against which new sites or extensions would be judged, similar to Tm1. Cross reference is also made to Env policies. Tm5 goes on to deal with extensions in particular, and sets out detailed, prescriptive limits – 1ha or 25% increase in area, or 150 additional pitches, whichever is the greater. It is not clear how these limits have been derived. Tm6 and Tm7 deal with holiday occupancy restrictions and touring sites respectively.
- 4.6.15 Also relevant to the site at Kilnsea, and perhaps to the site at Easington, is policy Env10 for the Spurn Heritage Coast. This is discussed in more detail in the Sandy Beaches Case Study (Chapter 7).

The East Yorkshire Borough Local Plan

- 4.6.16 This plan has an overall policy, EN2, for development in the open countryside. This is not actually very restrictive, but seeks to ensure general protection for the best and most versatile agricultural land, local character and nature conservation interests.
- 4.6.17 Policy T1 sets out the general approach towards tourism development. Priority appears to be given to development within development limits, allocated and existing sites, but the second half of the policy does deal with situations where this might not be possible. Cross reference is made to the more detailed environmental and coastal policies of the plan.
- 4.6.18 Policy T3 is where five specific criteria are set out for new or extended holiday parks. The criteria relate to visual appearance and character impacts; residential amenity and land use conflicts; and highway issues, though no specific limits are set out. Again, cross reference is made to relevant coastal policies. What is perhaps more important is that the main body of the policy refers to siting, design, operational characteristics, visitor pressure and cumulative effects with other sites. The accompanying text reinforces the potential landscape impacts. Policy T4 is specifically to restrict occupancy of caravans and holiday homes.
- 4.6.19 Chapter 13 of the EYBLP contains a suite of CZ policies for the coastal zone. CZ3 generally discourages coastal defence works along the (undeveloped) Holderness Plain. Paragraph 13.43 then sets the scene for the succeeding policies which are designed to enable properties and businesses at risk to relocate.
- 4.6.20 The text supporting policy CZ4 reiterates concerns elsewhere in the plan that caravan site development can be detrimental to the very quality of the environment for which tourists visit the area – particularly in terms of visual intrusion, landscape character and the dominant effect which they can have on small settlements, especially when there is a concentration of sites. These factors are perhaps more prominent in this plan than the HDLP because of the greater numbers of pitches and sites, often closely grouped (particularly at Skipsea / Ulrome) in this part of the East Riding coast. CZ4 therefore sets the tone by being restrictive in its approach towards new sites, except within the terms of the next three policies.
- 4.6.21 Policies CZ6 and CZ7 are relevant to sites at risk in this study. CZ6 allows for new caravan sites to replace existing ones at risk, though “At risk of loss” is not defined in the plan. The supporting text refers to the Council’s preference for sites at risk to be relocated in their entirety, and a distance of more than 400m from the cliff edge (contrasting with

200m in the HDLP) is specified. However, some flexibility is given to permit replacement extensions on the landward side of existing sites. This would imply more of a progressive rollback rather than single relocation in the form of a “replacement” or “new” site described elsewhere in the policy. The supporting text in paragraph 13.54 makes it clear that such extensions should address the long term problem, suggesting a 75 year time period for the purposes of this type of development. There is a requirement to remove and restore the existing site, though afteruses and the form of restoration are not detailed. It also considers the implications for drainage and sewage disposal over that period.

- 4.6.22 Policy CZ7 deals with improvements to caravan sites, which the Council recognises are needed to maintain competitiveness in the tourism sector. It acknowledges that additional land may need to be used; but requires advanced landscape planting to be established, and puts a bar on increases in caravan pitch numbers.

Conclusions on the Local Plan policies

- 4.6.23 Overall, the range of policies in the two plans give some encouragement to the rollback / relocation of caravan and holiday home parks at risk of erosion. This is more clearly expressed in the East Yorkshire Borough Local Plan, with an explicit link between erosion effects and caravan pitch loss. At the same time “behind” the policies in the EYBLP there appears to be a somewhat restrictive approach due to concerns about caravan proliferation and landscape issues there. The defined distance of 400m from the cliff for new sites could potentially rule out sustainable relocations a little nearer; and “no increase in caravan numbers” in relation to extensions is also of concern. Detailed limits and restrictions relating to site pitch numbers also crop up, and may be hard to justify, in the HBLP, in relation to extensions.
- 4.6.24 The Plans could be made more flexible, effective and pro-active in seeking sustainable development gains. This will require subtle but important changes in wording and emphasis if significant rollback is to actually occur.

4.7 Other Plans and Strategies

- 4.7.1 **The Yorkshire and Humberside Regional Economic Development Strategy** (published by Yorkshire Forward) identifies seven priorities for action. Of greatest relevance to this Study is the need to:

"develop a better product and a strong positive image and devising a strategy to boost our cultural assets, particularly tourism".

- 4.7.2 Other key objectives include overcoming tensions by producing "win-win" outcomes, such as creating jobs with environmental benefits (3.36).
- 4.7.3 Successive versions of the **East Riding of Yorkshire Council Economic Development Strategy** have referred to the heavy dependence of the area on agriculture, and to coastal areas having relatively high levels of deprivation.
- 4.7.4 The East Riding of Yorkshire Council's **Biodiversity in the East Riding of Yorkshire - Species and Habitat Action Plans** have the potential to act as a 'template' for measuring the impact of development on biodiversity. - possibly in a positive way through proposals

which can provide biodiversity enhancements. It mentions tourism and leisure pressures on coastal habitats, but does not identify development in the Coastal Zone as something requiring action.

4.7.5 The **East Riding of Yorkshire Community Strategy (2003)** aims grouped under 5 headings:

- **Improved Health** – improved quality of life
- **Greater Prosperity** – higher living standards
- **Reduced Crime** – reduced fear of crime
- **Lifelong Learning** – improved educational achievement
- **Healthy Environment** – for future generations

4.7.6 Encouragement for rollback could be seen as assisting to achieve aims under all of these headings, but particularly the first, second and third (despite there being no specific reference to the coast or coastal issues).

4.8 Conclusions

4.8.1 The policy framework for the area lends considerable support to the aims of the ICZM in seeking new policies and approaches to caravan and holiday home park rollback and relocation to deal with coastal erosion. This is not just contained in planning policy, but also in other relevant strategies.

4.8.2 However, the analysis highlights the inconsistencies between the two local plan areas. Both sets of local plan policies have good elements, but reconsideration of the detailed wording might yield some small, but important changes; and perhaps give a more flexible approach rather than setting out precise limits which have to be adhered to. Also, neither plan seems to cater for extensions to existing sites specifically to relocate pitches at a different, erosion-threatened site elsewhere – a potential form of pitch-banking.

4.8.3 Lastly, we do not support the EYBLP preference for relocated, new sites as opposed to progressive rollback of existing sites. There is no clear reason which we are aware of which means that one method of dealing with coastal erosion threats is preferable in principal, to the other. Either method may be acceptable and sustainable, depending on the particular circumstances of the case.

5. Recommended Policy Guidance

5.1 Main Points

5.1.1 Our overriding recommendation for any new policy framework is that it be based on an assessment of the sustainable development gains and losses – if the balance sheet is positive, and net benefits would be accrued, then the development should be allowed to go ahead. This is because the decision to be positive and pro-active towards rollback has already been taken, and the next task is to ensure that sustainable proposals can find a way through the planning system.

5.1.2 In connection with this, our advice is that whilst it is important to ensure that individual planning factors are carefully considered - eg effects on residential amenity or landscape impact due to a new site - it is equally important not to lose sight of the bigger picture. It

would be unfortunate if proposals with potential overall benefits do not proceed because of a single issue, unless the Council can be sure that this really does cross a threshold which makes it unacceptable. Therefore, policy and guidance should state what issues are important, but should be wary of imposing absolute limits and thresholds will be applied in all situations. There is a need to build in flexibility to cater for site-specific circumstances. We recommend that in most respects, guidance gives an indication of standards, but treats these as "benchmarks" rather than absolute limits. For instance, it may be desirable to maintain a buffer from settlement edges, and in many cases this should be at least 100m deep. However, in some circumstances a much smaller buffer - say 50m or less - may be adequate, especially if screening or existing features enhance its effectiveness. Therefore a dogmatic adherence to a 100m would be inappropriate in that case.

- 5.1.3 The policy stance is to start from a restrictive position, whereby new caravan sites or extensions to existing sites in the Coastal Zone will not be granted. However, this can be phrased in a way which is at the same time positive towards extensions or new sites where this is to rollback or relocate pitches at risk from coastal erosion. Up to this point, this is essentially the approach of policy CZ6 of the East Yorkshire Local Plan. The timescale for "at risk" in this sense can be defined within the policy as 100 years. Where this is the case, rollback and relocation will be granted, as long as certain criteria are met and tests passed.
- 5.1.4 Policy and guidance can make it clear what form development might take - in terms of rollback extensions to sites at risk, entirely new relocated sites, or pitch-banking extensions to sites elsewhere. It can then go on to say what the criteria and tests are.
- 5.1.5 A number of different approaches might be available to the Council to develop an improved policy framework for rollback. The principles of these approaches are set out below, before suggested ways forward are detailed in the next chapter.

Procedure, Law, Development Plan Policies and Guidance

- 5.1.6 There is an important distinction to be made between plan policies themselves, and guidance, which together make up the policy framework.
- 5.1.7 Because of the statutory requirement to follow S.54A of the Town and Country Planning Act 1990, compliance with the policies of the development plan is usually the main issue when determining applications for planning permission. Departing from the plan requires a clear indication of overriding "other material considerations". This means that, where the existing policies do not entirely accord with emerging views and policy approaches, care has to be taken to ensure that the law is not contravened.
- 5.1.8 Where emerging policy guidance seeks merely to interpret existing policies in a particular way, there is not an issue of principal and law. However, where new policy approaches lead to clear and direct conflict with existing statutory development plan policies, then decisions made in line with those new policies may be open to legal challenge in certain circumstances.
- 5.1.9 This might be the case, for instance, in relation to the prescriptive limits in EYBLP policy CZ6 and in HDLP policy Tm5. If the new policy approach were to accept extensions of 50% in area, the Tm5 adopted plan policy would not be complied with. The Council might find itself accused of making policy rather on the hoof, rather than going through the proper course of development plan preparation and adoption; and indeed even subject to judicial review. If it was argued that other material considerations had now overruled the plan policies, that argument might stand up to scrutiny; but again it might not.

5.2 Options

Plan Review

- 5.2.1 For these reasons, it appears that in an ideal world it would be desirable to promote and formally adopt a revised Local Plan policy to give a more up to date, consistent approach in the area. It would overcome the policy inconsistencies between the two local plans. Also, this would ideally be backed up by detailed Supplementary Planning Guidance for caravan and holiday home parks at risk from coastal erosion.
- 5.2.2 The main difficulties with this concern timescales and procedures. The Structure Plan review is the current forward planning priority of the Council. Consultation on the Deposit draft ended in May 2003, and it is intended to “save” the plan in 2004. Planning at the more detailed local scale will then be affected by proposals in the Planning and Compulsory Purchase Bill, the outcome of which is unclear. However, it is likely that the first local development framework document will not be published in draft form before early 2005, with adoption some time hence following extensive consultation and a Public Inquiry. A wholly revised local plan (in whatever form) is therefore very unlikely to emerge within the next two to three years.

Plan Policy Alteration

- 5.2.3 An alternative to whole plan review is to publish an alteration, dealing with a small number of specific policies. This would restrict the scope of revisions, publicity and consultation, and probably the extent of (and possibly even the need for) a Public Inquiry. This may be the case if policy changes to encourage rollback receive general support. Timescales would probably be reduced, with adoption well before a full plan review could be completed. It would overcome the policy inconsistencies between the two local plans.

Supplementary Planning Guidance – in relation to a new policy

- 5.2.4 If a plan alteration is pursued, then formal Supplementary Planning Guidance (SPG) for interpretation of that new policy could be published and dealt with in parallel. PPG12 advises that SPG should be subject to consultation before adoption by the Council, in order to carry substantial weight in development control decisions. Again, given the relatively narrow scope of the new policy approach and the general support for rollback which is anticipated, the whole consultation process could be compressed in time.

Supplementary Planning Guidance – in relation to the existing policies

- 5.2.5 A variation on this would be to publish SPG relating to the existing local plan policies, which would have the advantage of not altering the adopted development plan itself. Again, the process for consultation might be relatively short. It would not address the policy inconsistencies between the two local plans.

Interim Policy Statement

- 5.2.6 As an alternative to formal policy revisions and SPG, it might be possible to prepare an interim policy statement and guidance. This could be presented to the Council for adoption as a development control tool, pending more formal action in the future in connection with the review / replacement of the Local Plans. Such a tool could be subject to some form of publicity and consultation (though not legally binding) in order to increase its validity, but would not carry the same weight in decision-making as formally adopted policy or SPG. It

would also not alter or entirely overcome the policy inconsistencies between the two local plans.

Choices and Recommendations

- 5.2.7 Choosing between the above options is largely a matter for the Council. It depends partly on the considerations of timescale related to the effectiveness and weight new policy and guidance might carry. In turn, this is effected by the Council's views on likely opposition to a new policy framework for the rollback of caravan sites, on which the Council is likely to be a better judge than DTA.
- 5.2.8 If opposition is thought to be low, we would recommend publishing an alteration together with formal SPG. If it likely to be high, then significant delays would be likely, and we would recommend putting forward an Interim Policy Statement for adoption by the Council.
- 5.2.9 Below, we set out suggested policy and guidance which could be used by the Council as the basis for pursuing the options described above. The guidance is written in an "SPG" style to be read by a wide variety of bodies and individuals.

5.3 New Policy

5.3.1 It is suggested here that an amended policy is drawn up along the lines set out below:

Replacement provision for caravan sites at risk from coastal erosion within the next 100 years (see table) will be permitted where:

- a) **it can be established that the proposals would present net sustainable development benefits beyond the present situation; and**
- b) **the whole of the resultant site would no longer be at risk within 100 years ; and**
- c) **any current coastal protection works associated with the existing site are removed; and**
- d) **proposals provide for the appropriate clearance and restoration of vacated areas, with enhancements to nature conservation resources, and provision of public access to the coast where appropriate; and**
- e) **the development is undertaken according to a programme and timescale which does not unduly prolong construction impacts or delay the realisation of sustainable benefits.**

Replacement provision in the Coastal Zone may be in the form of:

- i) **An entirely new site to replace the whole of the site at risk; or**
- ii) **An inland extension to the site at risk; or**
- iii) **An extension to another existing site beyond the area of risk.**

Increases in site area and / or the number of pitches will be permitted, where it can be demonstrated that these are necessary to secure the relocation or replacement of the site at risk and an improvement in its provision.

Proposals at the new site should seek to:

- Ensure a net reduction in the impact on the character and landscape of the area;**
- Achieve improvements in accommodation provision, layout, design and landscaping**
- Not result in a significant worsening of traffic congestion or highway safety on the local network**
- Have an acceptable relationship with existing settlements with regard to their character, setting, residential amenity and local services**
- Safeguard any existing nature conservation resources.**

Planning conditions and obligations will be used to secure any or all of these factors, as appropriate.

5.4 Guidance

- 5.4.1 It is suggested that the following guidance would assist in the interpretation of the above policy, for the benefit of applicants and developers, planning officers, elected members and the general public.

A. Introduction

- A.1 This guidance addresses the issues associated with caravan and holiday home parks which are threatened by coastal erosion, and how the planning system can help them to deal with this. There are two main ways of addressing the problem. **Rollback** is where the parts of a site which are risk from erosion are replaced by an extension to the same site, but on the landward side where it would not be at risk. **Relocation** is where all or part of a site at risk from erosion is moved inland to a separate location which is not at risk. Relocation can itself occur in one of two ways: either by constructing an entirely new site, or as an extension to a different existing site (sometimes known as pitch banking).

- A.2 One of the main drivers for a positive approach to rollback and relocation is that in most situations, the provision of hard engineered coastal protection works is not seen as a sustainable way of maintaining caravan sites. There is a need to shift the debate away from defences to finding alternative solutions.

- A.3 Recognising these difficulties, the East Riding Integrated Coastal Zone Management Plan contains the following policy aims:

CP3: “To encourage “rollback” as a response to erosion for all forms of development, where appropriate”.

TO6: “To encourage (tourism) businesses at risk from erosion to relocate where appropriate, and to investigate opportunities for providing assistance in this”.

- A.4 This guidance seeks to contribute towards achieving those aims by helping caravan and holiday home parks which are at risk from coastal erosion to rollback or relocate to areas where risk is low for the foreseeable future.

B. Sites at Risk

- B.1 The East Riding Coastline is one of the fastest eroding in Europe. Rates of erosion vary along the coast and over time. Localised variations can occur, sometimes around hard points, such as near to coastal protection works or other hard obstacles. Sometimes a period of rapid erosion and retreat of the cliff can span several years, though equally this can be followed by a period of slower erosion. Predicting future rates of erosion at a particular locality is a difficult exercise to carry out with any precision.

- B.2 The East Riding Council has been monitoring erosion rates along the coast for many years. The Council is therefore a good source of information when attempting to assess how much of a site might be at risk from coastal erosion over a given period. As a general guide, over the long term, most parts of the coast between Barmston and Atwick are eroding at an average rate of approximately 1.0m – 1.5m per year; and those from Hornsea down to Kilnsea at approximately 1.5m – 2.0m per year.

- B.3 On this basis, this Guidance applies to those sites which are judged to be at risk (partly or in total) from coastal erosion within the next 100 years.**

- B.4 A list of those sites on the East Riding Coast which fall into that category is given in Appendix A. Should erosion information and analysis indicate in the future that other sites are at risk, they would also fall under the scope of this Guidance.

C. The Need for Planning Permission

- C.1 It may be possible to cope with loss of site area and pitches to coastal erosion by reorganising within the site, changing the layout, and using land more efficiently. However, there is usually a limit to which this can help before the quality of the site, its space standards and appearance begin to suffer. If the site is to retain its current level of provision, it will normally be necessary to resite all or some of the pitches and infrastructure on to land which has not been previously used as a caravan and holiday home park.
- C.2 In most cases, that change of use will require planning permission, which must be obtained from East Riding of Yorkshire Council. Planning permission is also likely to be needed to carry out any building works – for instance to construct offices and amenity buildings – and for other engineering activities such as making roadways.
- C.3 S.54A of the Town and Country Planning Act 1990 dictates that when considering applications in relation to a development plan:

“..... the determination shall be made in accordance with the plan unless material considerations indicate otherwise.”

- C.4 Therefore the Council must look at the planning policies for the area, and at all other relevant “material considerations”. Material considerations are often factors which are site-specific, such as the need for a particular standard of access road and entrance on to the local highway. The planning policy framework for the area includes broad scale national and regional strategic guidance; and most importantly the more local Development Plan.

Either (in relation to the existing local plan policies):

D. The Policy Framework

- D.1 At the national level, the Government publishes Planning Policy Guidance notes (PPGs), which set out general principals for planning topics across the country. Of most relevance to the issues surrounding caravan rollback are PPG20 (Coastal Planning) and PPG21 (Tourism). Regional Planning Guidance for Yorkshire and the Humber (RPG12) provides further guidance at the regional level.
- D.2 At the local level, the development plan for the East Riding currently comprises the strategic Structure Plan, and the detailed Local Plans. Currently, the statutory structure plan is the Humberside Structure Plan of 1987. Two local plans are in force in the coastal area – the East Yorkshire Borough Wide Local Plan (1997) in the north, and the Holderness District Wide Local Plan (1999) in the south. Relevant policy extracts are contained in Appendix B.
- D.3 There are differences in the wording and policy content of the two local plans, and it has not always been clear to applicants what is required to obtain planning permission for rollback proposals. Whilst there is a clear need to provide safeguards and require high standards of development, there is a danger that the policies could be interpreted and applied in such a way as to inhibit applications for sustainable development from being made and implemented. This guidance seeks to show how the Council intends to treat applications in a positive, constructive manner.
- D.4 The Structure Plan is currently in the process of review, and a joint document has been prepared between the East Riding and the city of Hull. In due course, this will replace the current document, probably some time in 2004. Following that, a single district wide, local development document will be produced to replace the two current Local Plans, in accordance with legislation presently before Parliament. The aim will be to improve the policy approach to rollback, but the timescale for that process is not known. In the meantime, the current local plans cannot be ignored when making decisions on planning applications.
- D.5 This document seeks to provide further guidance on how the Council views proposals for the rollback and relocation of caravan and holiday home parks, in the light of the current local plan policies, and in the light of the ICZM Plan. It seeks to be positive towards rollback, recognising the substantial contribution which the industry makes to the local economy. Where there are constraints and potential adverse effects of development, it tries to show how solutions might be found to overcome these difficulties. Where there are potential social, economic and environmental benefits to be gained from development, it indicates how these might weigh in favour of a proposal.

Or (in relation to a new policy):

D. The Policy Framework

- D.1 At the national level, the Government publishes Planning Policy Guidance notes (PPGs), which set out general principals for planning topics across the country. Of most relevance to the issues surrounding caravan rollback are PPG20 (Coastal Planning) and PPG21 (Tourism). Regional Planning Guidance for Yorkshire and the Humber (RPG12) provides further guidance at the regional level.
- D.2 At the local level, the development plan for the East Riding area currently comprises the strategic Structure Plan, and the detailed Local Plans. Currently, the statutory structure plan is the Humberside Structure Plan of 1987. Two local plans are in force in the coastal area – the East Yorkshire Borough Wide Local Plan (1997) in the north, and the Holderness District Wide Local Plan (1999) in the south.
- D.3 In due course, it is anticipated that the current local plans will be replaced by a new style Local Development Document, in accordance with legislation presently before Parliament. In the meantime, the current local plans cannot be ignored when making decisions on planning applications.
- D.4 The policies of most relevance to the rollback of caravan and holiday home parks are policy ??? of the East Yorkshire Local Plan, which is identical to policy ??? of the Holderness Local Plan (see Appendix B). This policy was produced as an alteration to the local plans, in order to remove differences and inconsistencies between the wording and policy content of the two local plans. The policy seeks to encourage rollback and relocation proposals and secure sustainable development benefits. At the same time, the policy retains safeguards and requires high standards of development.
- D.5 This document seeks to provide further guidance on how the Council views proposals for the rollback and relocation of caravan and holiday home parks, in the light of the current planning policy framework, and in the light of the ICZM Plan. It seeks to be positive towards rollback, recognising the substantial contribution which the industry makes to the local economy. Where there are constraints and potential adverse effects of development, it tries to show how solutions might be found to overcome these difficulties. Where there are potential social, economic and environmental benefits to be gained from development, it indicates how these might weigh in favour of a proposal.

Or (in relation to an interim policy):

D. The Policy Framework

- D.1 At the national level, the Government publishes Planning Policy Guidance notes (PPGs), which set out general principals for planning topics across the country. Of most relevance to the issues surrounding caravan rollback are PPG20 (Coastal Planning) and PPG21 (Tourism). Regional Planning Guidance for Yorkshire and the Humber (RPG12) provides further guidance at the regional level.
- D.2 At the local level, the development plan for the East Riding area currently comprises the strategic Structure Plan, and the detailed Local Plans. Currently, the statutory structure plan is the Humberside Structure Plan of 1987. Two local plans are in force in the coastal area – the East Yorkshire Borough Wide Local Plan (1997) in the north, and the Holderness District Wide Local Plan (1999) in the south.
- D.3 The Structure Plan is currently in the process of review, and a joint document has been prepared between the East Riding and the city of Hull. In due course, this will replace the current document, probably some time in 2004. Following that, a single district wide, local development document will be produced to replace the two current Local Plans, in accordance with legislation presently before Parliament. The aim will be to improve the policy approach to rollback, but the timescale for that process is not known. In the meantime, the current local plans cannot be ignored when making decisions on planning applications.
- D.4 There are differences in the wording and policy content of the two local plans, and it has not always been clear to applicants what is required to obtain planning permission for rollback proposals. Whilst there is a clear need to provide safeguards and require high standards of development, there is a danger that the policies could be interpreted and applied in such a way as to inhibit applications for sustainable development from being made and implemented. For that reason, the Council has adopted Interim Policy???, contained in Appendix B. Whilst the Interim Policy is not a part of the statutory development plan, ???, it will carry considerable weight for development control purposes.
- D.5** This document seeks to provide further guidance on how the Council views proposals for the rollback and relocation of caravan and holiday home parks, in the light of the Interim Policy, and in the light of the ICZM Plan. It seeks to be positive towards rollback, recognising the substantial contribution which the industry makes to the local economy. Where there are constraints and potential adverse effects of development, it tries to show how solutions might be found to overcome these difficulties. Where there are potential social, economic and environmental benefits to be gained from development, it indicates how these might weigh in favour of a proposal.

E. Net Sustainable Development

- E.1 In determining applications for rollback and relocation, the Council will seek to answer the following overarching question:

are there overall sustainable development benefits to be gained from a proposal for rollback?

- E.2 This is not an exact science, and will require complex judgements to be made, often weighing many competing factors against each other. In considering these factors, the size of site or number of pitches will be one aspect, but may not necessarily decide the issue. As a general rule, larger site changes have the potential to provide larger benefits; but by the same token larger proposals have the potential to have greater adverse impacts. Each site, whether it is large or small, will need to be examined individually to see where the balance lies.

Maintaining the Economic Contribution of the Site

- E.3 Tourism in general, and the caravan and holiday home park industry in particular, is a very important part of the local economy. It generates income, both to the sites themselves, and to local businesses which service the sites and visitors to the area. The industry provides local employment, both year-round and seasonal.
- E.4 Other, indirect economic benefits are relevant. For instance, rollback and relocation can often lead to the need and stimulate demand for newer and better caravan units. The fabrication of caravans and terraces is an important industry in the local and slightly wider area.
- E.5 Maintaining these sites, enabling the businesses and jobs to continue or to be transferred, is therefore an important economic and social consideration. Information about the employment aspects of a rollback or relocation proposal should be supplied by applicants.

Reducing the Need and Demand for Coastal Protection Works

- E.6 This underpins the positive approach to rollback. Rollback and relocation proposals can present opportunities to:

Dismantle existing sea defences where these exist, in a controlled manner. This can remove their interference with natural coastal processes, both in the immediate and wider sea environment. Also, some defences may be in a poor state of repair, becoming increasingly hazardous and expensive to maintain over time. In some cases it will not be possible to remove protection works, where these provide protection for other assets or development.

Reduce the demand for future protection works and their maintenance, so that efforts and resources can be concentrated on seeking more sustainable solutions.

- E.7 The degree to which these factors weigh in favour of a proposal will depend on what is already there, the length of cliff frontage involved, and how urgent calls for protection works would be. Particular emphasis will be placed on proposals to address existing and predicted future problems associated with current coastal protection works.

Improvements in Site Quality

- E.8 Rollback and relocation can often provide an opportunity to improve the standards of

pitches, caravan units, internal landscaping, services and facilities. Public expectations and demand for improvements in site quality are gradually but continually rising over time. Visitors to the area now demand larger pitches, often with better landscaping and amenities, to go with the larger and more modern caravans the public is investing in. This has a wider benefit in improving the image of the area for all visitors, not just those staying on these sites.

- E.9 Improvements to site quality are seen as an essential element of any successful site relocation or rollback proposal.

Improvements in Site Appearance

- E.10 Similarly, the image of the area would be improved by sites which are incorporated better into the landscape of the area. Some older sites are in prominent locations, with an adverse effect on landscape character, and are visually intrusive. This can be harmful to one of the main environmental and tourist assets of the area – the extensive views along the coast and cliffs.
- E.11 Clearly, care has to be taken to ensure that new sites are not detrimental to the landscape character of the area. However, external landscape planting to screen and enhance caravan and holiday home parks can be extremely effective, especially if introduced some years in advance of an extension or new site being occupied. If an unattractive cliff-edge site is removed and restored, there is the potential for a substantial net improvement in this respect.
- E.12 The Council will expect high quality landscaping proposals, often in the form of advanced planting.

Nature Conservation Gains

- E.13 Any development in the countryside has the potential to adversely affect nature conservation interests, and new caravan and holiday home parks as a result of rollback or relocation are no exception. Site assessment would be needed to ensure this can be taken into account.
- E.14 At the same time, cliff-edge sites which are vacated have considerable potential to provide nature conservation enhancements. Clearance of pitches and infrastructure can be extended to a more considered restoration, with careful seeding, planting and longer term management where appropriate. Advice from bodies such as the Yorkshire Wildlife Trust and English Nature can assist with the design and possibly implementation of such schemes, using native local species. This can have wider public benefit than simply sowing the land with standard amenity grass mixes and a regular mowing regime.

Access and Open Space Improvements

- E.15 There are relatively few public rights of way to the East Riding coastal edge, and even fewer running along it. The provision of public access to restored sites, and possibly the beach itself, whether by dedicating a statutory right of way or providing more informal paths, would be seen as a significant benefit to visitors and local people alike. This would be enhanced if access would provide connections and links with other paths, where possible, to enhance the network as a whole.

Provision of Tourist and Community Facilities

- E.16 New provision for tourist facilities can provide benefits. Small scale visitor centres, information and interpretation boards can significantly enhance the tourism experience, and can sometimes link the new site with visits to the restored former site at the cliff edge. It may be possible to integrate this with any biodiversity and access provisions.
- E.17 Clubs and recreational provision can sometimes be used by the local community as well as tourist visitors to the area, thereby contributing to the social dimension of sustainable development.

SUDS

- E.18 Pollution issues, particularly drainage and water quality, are important considerations. Sustainable Urban Drainage Systems (SUDS) have the potential to introduce improved methods of sewage treatment on to sites than may have been the case in the past. Relocation and rollback proposals may provide the opportunity for this to occur, with potential benefits for reduced pollution.

Highways, traffic and access

- E.19 The use of local roads by caravan site traffic can cause congestion and safety problems, especially in summer. This can have an impact on the amenity of local residents and communities.
- E.20 The situation with regard to the use of local roads needs to be examined carefully with respect to both the existing site, and any new site. Where an existing site has presented problems in the past, it may be possible to improve the situation through creation of a better access at a new site. Similarly, if rollback is achieved through extension to a different, existing site which already has a satisfactory approach and entrance, a net benefit may occur.

Relationships to Settlements

- E.21 In some parts of the East Riding Coast, there are a large number of caravan sites, with many pitches. Where these are close to settlements and individual houses, this can have an adverse impact on residential amenity, through noise and disturbance, particularly in peak periods; and also in terms of visual impact. When sites are constructed, there is also potential for noise, disturbance and traffic problems for the duration of the works. Also, it is sometimes felt that caravan parks can become dominant in a local area, adversely affecting the character of a village.
- E.22 Judgements concerning these issues can be particularly difficult to make, and each case is likely to need careful examination. However, as a rule of thumb, a buffer of approximately 100m should normally be maintained between new or extended caravan parks and settlement boundaries. Where a smaller distance is proposed, the Council will expect this to be justified, and any potential adverse impacts to be mitigated – possibly by additional landscaping.

F. The Scale and Costs of proposals

Costs

- F.1 The Council recognises that moving all or part of a site can have profound implications for the financial structure of the business, both in terms of capital expenditure, operational

costs and income. Land purchase, pitch and building construction and service installation are among the major cost items. The construction of main buildings may be a particularly large expense to bear before fresh revenue is generated. Other areas which are likely to incur substantial costs include:

- **Restoration:** the Council will require the clearance and restoration of vacated sites. Consideration may also need to be given to the long term management and control of those areas
- **Landscaping:** planting, and in some cases earth mounding, may be required in and around the site.
- **Removal of existing coastal protection works:** this is important both as a benefit of the proposal, and in order to avoid later deterioration requiring emergency action for safety reasons.
- **Highway and entrance works:** normally required to be in place before the new site opens.

F.2 It is also recognised that the relocation of existing tenants and general disruption can lead to a loss of business, even when a higher quality pitch and site is offered. Although this may be temporary, it could be significant.

Phasing

F.3 The phasing and timing of rollback or relocation can be critical to the success of a rollback or relocation scheme. For practical, operational reasons, a rollback or relocation may have to be spread over an extended period of time. This can have implications for local communities – for instance because it leads to a longer period of disruptive construction traffic and disturbance. Also, it would delay the delivery of some sustainable development benefits, such as site restoration and access improvements. For these reasons, the Council seeks to minimise the period of changeover, and in some cases this will be possible to complete schemes in a short period of time.

F.4 At the same time, the Council recognises that an extended period of time may be needed to help absorb the costs identified above, and the potential loss of business before the new area is fully established. In general terms, cost implications are likely to be less for proposals involving extensions to existing sites, and where there is no major infrastructure being moved.

F.5 Therefore the Council will use the following guidelines as “benchmarks” for phasing of relocations and rollbacks:

- | | |
|---|----------------------|
| <input type="checkbox"/> 15 pitches or less: | 1 year |
| <input type="checkbox"/> 16 to 30 pitches: | 2 years |
| <input type="checkbox"/> More than 30 pitches: | Up to 4 years |

F.6 Longer than 4 years may be allowed for major site relocations, and when substantial infrastructure is involved. However, the case for this would need to be clearly made, and it should not lead to excessive delay in the delivery of site restoration and other sustainability benefits, especially where these provide the justification for the scheme.

Pitch Numbers and Site Area

F.7 There is a concern that the numbers of caravan and holiday home pitches and the area which parks occupy could expand so much that it would dominate the undeveloped coast

in the East Riding. The Council is not prepared to let this happen.

F.8 However, the Council also recognises that, in order to generate the additional income required to absorb the investment and disruption costs of rollback and relocation, an increase in the numbers of caravan pitches may be needed, compared to those which would be lost to erosion. Additionally, the increasing expectations and standards of visitors means that the size of pitches and caravans, and the space needed to accommodate landscaping and other features, has risen considerably since many of the older sites were originally constructed.

F.9 A balance therefore has to be reached, and an allowance may be made for rollback and relocation proposals to include a “pitch multiplier” factor in appropriate instances.

F.10 Therefore the Council will use a figure of the following guidelines as “benchmarks” for pitch multipliers and area increases in relocations and rollbacks:

Pitches:	1.1 – 1.5
Area:	1.2 – 1.7

F.11 The Council will expect straightforward extensions only involving pitches to be towards the bottom end of both ranges. Similarly, where rollback or relocation involves touring caravans, area multipliers will be less, as they can be accommodated within generally smaller pitches.

F.12 Relocation of site infrastructure may push a proposal higher up the area range. Sites which are at the top end of the pitch range are likely to also be towards the top end of the area range. In all cases, applicants should make a clear case for any multiplier, and proposals above these benchmarks are likely to be resisted.

6 The Use of Public Finance to Support Policy Implementation

6.1 The Basic Principles

- 6.1.1 Yorkshire Forward have appropriated a fund to assist in the realisation of schemes which meet the objectives of the ICZMP with regard to relocation of caravan sites susceptible to coastal erosion. This fund is to be managed by the East Riding of Yorkshire Council.
- 6.1.2 As established by this study, the financial implications of such rollback or relocation projects are significant, and can be onerous - if not completely prohibitive to smaller operators.
- 6.1.3 Given the wider appreciation and acceptance that the economic contribution which the caravan industry on Holderness makes is of sub-regional importance, and that there are wider public benefits to be enjoyed through the rollback of threatened sites, the principle of the use of public funds to help facilitate this is supported by this study. There is, however, a significant point of principle which must first be appreciated and acknowledged if appropriation of grant aid to assist with rollback schemes is to be agreed.
- 6.1.4 The caravan industry on Holderness is now entirely under the ownership and management of private businesses, the majority of which are locally based, two of which are part of larger national holiday park chains. The implications of this are that any public funding could be seen to be directly benefiting private business interests. However, as established by this study, the economic realities of rollback and relocation are such that the public benefits expected to accrue from such projects may not be realised without *at least* a more favourable planning policy context, and then probably some level of financial assistance in order to swing the balance towards improved viability of those proposals.
- 6.1.5 **It is therefore proposed that there should be an acceptance that the use of public monies will inevitably assist or benefit private interests, but in doing so wider public benefits can be secured.**
- 6.1.6 Without the prospect of utilising public financial aid such schemes and associated benefits may not come forward, and there is the real possibility that expense to the public purse will inevitably occur in the restoration of sites or private sea defences that will otherwise deteriorate and crumble on to the beaches of Holderness, in the process becoming the liability of the Council. It could be argued that such a situation may be considered to discourage the proper maintenance and care of such structures where the costs of such action begin to outweigh the commercial value of the site it protects.
- 6.1.7 **It is also proposed that it is made clear that use of public funds will be dependent on obtaining planning permission for any works involved in the rollback or relocation wherever necessary.**

6.2 Scale of Assistance

- 6.2.1 On accepting the principle of public grant aid to the rollback programme, a further consideration is that of the *scale* of financial assistance necessary for any one individual proposal to become viable. Such amounts may be very significant, requiring a substantial sum of grant aid to be forwarded to the business if it is to have any influence at all in facilitating the scheme. Small scale grant aid of, for example, less than £10,000 would be very unlikely to facilitate even the smallest of sites relocating, given the cost of land acquisition, construction of pitches and the reinstatement of the vacated sites. Clearly the implications for wholesale relocations of medium to large scaled sites could involve very significant amounts of money,

as enlarged upon in the three case studies (chapter 7).

- 6.2.2 In reality, the availability of such amounts of grant aid is very unlikely to be available to facilitate the relocation or rollback of all 24 sites identified as being at risk by this study.

Equity

- 6.2.3 Issues of fairness and equity also need to be entered into the consideration of appropriating public monies into private business proposals. Clearly the viability of some of the smaller, perhaps less well catered for sites along the East Yorkshire coast might be considered to be less able to stand the costs or raise the finance necessary to relocate away from at risk areas. Here financial grant aid might be a more powerful tool in achieving the ICZMP aims. However, should such sites be more eligible to grant aid than larger and more intensively or effectively managed sites where the owners previous business acumen and investment has now resulted in greater financial flexibility in the face of coastal erosion?
- 6.2.4 In order to address this issue it is proposed that the economic well-being of the site business which is applying for grant aid should not be a restrictive factor in the consideration of its appropriateness. Instead, the factors for assessing eligibility should be restricted to the securing tangible public benefits, but which in doing so, reduce the overall burden of the proposal on the site manager, and improve the economic viability.

6.3 Preferred Approach for the Use of Public Grant Aid

- 6.3.1 It is therefore necessary to examine and identify where grant aid would be most appropriately and fairly directed. The most obvious approach would be to appropriate monies to schemes which would then realise the greatest level of tangible public benefit. Whilst difficult to quantify in financial terms, such gains could be in the form of the removal of sea defences which interrupt natural processes or constitute health and safety risks, securing public access and biodiversity gains to vacated sites, improvements in the standard of landscaping to new sites, or where the scheme would result in an advantageous situation on the local highway network. Such benefits can be enjoyed indefinitely on their implementation, and in the case of the natural coastal process and biodiversity enhancements, serve to stimulate wider benefits across Holderness.
- 6.3.2 Whilst of more obvious public benefit and likely to demand smaller sums of grant aid, the monies required to facilitate these aspects of any given scheme, with the notable exception of removal of sea defences, would nevertheless be quite unlikely to on their own change an uneconomic scheme into a viable one.
- 6.3.3 However, it is suggested, that on balance, the realities of the economics of site relocation cannot be significantly altered without very significant amounts of aid, the availability of which is unlikely over a longer period, and for which the fairness in comparison to other sub-regional sectors of the economy, such as hotels, is questionable. Each business and each site relocation proposal will have its own particular circumstances which would not easily allow for an equitable system for the granting of aid dependant on certain factors to be developed or applied. Furthermore, detailed assessment will be necessary to establish the true financial capability of each business to cover expected costs of rollback proposals, in order to assess the need for, and level of, grant aid. This in itself would be an onerous and intrusive task and require specialist skills.
- 6.3.4 Therefore it is proposed that the allocation of funds available are not used to subsidise otherwise unviable projects. The level of funding expected to become available would not be sufficient to address this issue, which instead is addressed by the more favourable planning

policy framework put forward. It is believed that the application of sensitive phasing and multiplier factors that business proposals will be facilitated.

6.3.5 The use of public grant aid should therefore be most effectively, and properly, awarded to 'value added' aspects of proposal which secure public benefits as set out above. In doing so, indirect assistance to ease the overall financial burden of the proposal will nevertheless be enjoyed by the site owner.

6.3.6 The level of the grant aid to be directed at each of these value added aspects of a scheme is also to be considered, as is the availability of other sources of grant aid, perhaps as a match fund. It can be argued that the full range of environmental and public access requirements of a proposal will be required as a result of the suggested new policy basis in any case. The site owner would therefore normally be liable to such costs. It is therefore reasonable that some of this liability is retained by the business interest, and therefore grant aid should be on a partial cost basis.

6.3.7 It is proposed therefore that the following guiding principles for the allocation of public funds be adopted by the Council in respect of the rollback of caravan parks:

- a) **Grant aid should not be made available specifically to improve the economic viability of a proposal.**
- b) **Grant aid will be made available to assist in the realisation specific aspects of rollback proposals which facilitate tangible public benefits. Such benefits may consist of:**
 - i) The removal of sea defences in order to help restore natural coastal processes and landscape enhancements.
 - ii) Restoration of the vacated site to a condition suitable for habitat creation and biodiversity enhancements
 - iii) Management arrangements to ensure such gains are established and maintained, and interpretation facilities to enhance public understanding of local environmental issues.
 - iv) The establishment of safe public access to the cliff top, and enhanced linkages to existing or proposed coastal rights of way.
 - v) Enhanced screening landscaping to rolled back sites, either within the site boundary, or as off-site planting.
 - vi) Improvements to the public road network which facilitates the rollback of a cliff top site, but where specific highway improvements are required by the Highway Authority.
- c) **Grant aid should be offered as a proportion of the total cost of such works to ensure that the developer maintains a contribution appropriate to his or her environmental responsibilities.**
- d) **Grant aid should normally be offered at a rate of 50% of total costs, except for sea defence removal where the council will consider the grant aiding of higher**

proportions to ensure essential works are fully and appropriately carried out.

7 Case Studies

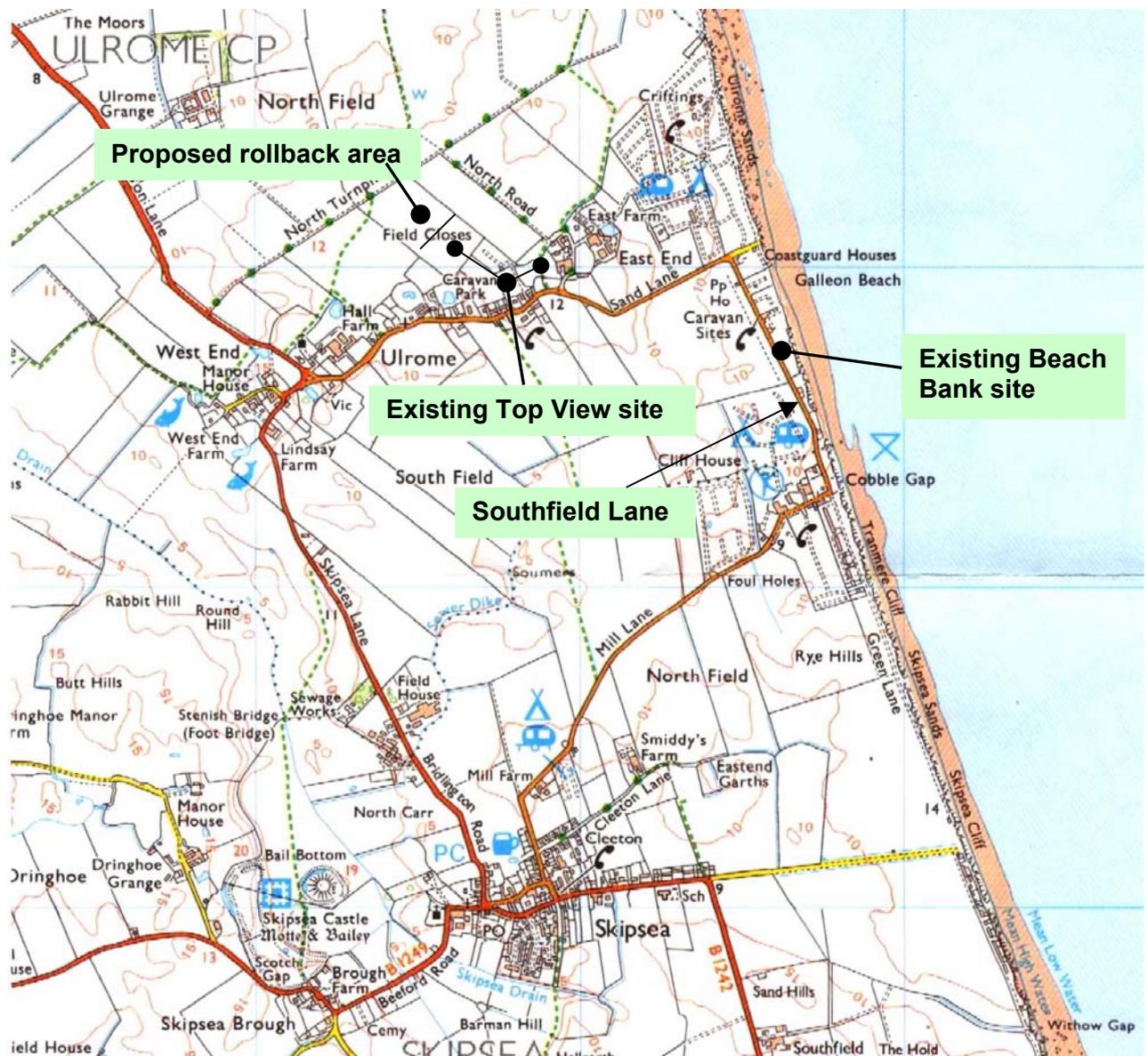
7.1 Choice of sites

- 7.1.1 The sites for more detailed examination were selected following suggestions to the Steering Group second meeting. It was decided that the original proposal to examine two sites should be expanded. This would look at three sites, representing different issues and locations, and potentially difficult problems to address. It was recognised that this might mean that slightly less detail might be generated, but that this disadvantage would be outweighed by the greater range.
- 7.1.2 It has been possible to use these case studies to highlight general points which can be applied to other sites. At the same time, there was a realisation that all sites have their particular and unique characteristics; and that no site-specific study can hope to be truly “typical” across the board.
- 7.1.3 The following sections of this chapter look at the three sites. The first is a site where relocation proposals have already come to an advanced stage in the planning process, but have reached an impasse. The case study seeks to set out the history of this process, and indicate how the impasse might be overcome in the light of the suggested new planning policy framework and guidance.
- 7.1.4 The second case study looks at a large site which may come forward for a whole site relocation. It raises issues of scale and large costs, movement of infrastructure as well as pitches, and of the potential landscape effects of a new site. Possible new sites are explored in terms of broad blocks of land fairly close to the existing site.
- 7.1.5 The third case study looks at a smaller site, but one which is in a sensitive designated area. The main theme here is how rollback might be carried out so as to promote, rather than conflict with the purposes and aims of the designation. Possible new site areas are examined on a field-by-field basis.
- 7.1.6 Each of these case studies has required a slightly different approach, which is reflected in the way they are presented in this report.

7.2 Case Study 1 : Beach Bank Caravan Site, Ulrome – Relocation to Top View Caravan Park, Ulrome.

Introduction

7.2.1 This case study sets out in detail how a privately instigated proposal to relocate seriously at risk, lower quality static pitches to a safe site at a significantly higher standard has faltered during the consideration of the scheme by the planning authority despite many positive attributes. The study has been compiled following detailed discussions with the site owner, his agent, and the development control manager responsible for the overseeing of the application to relocate 90 pitches from Beach Bank to Top View Caravan Park (see Figure2).



Not to scale

Figure 2 – The location of the Beach Bank and Top View sites

The Existing Site

- 7.2.2 This relatively small site, owned by is Mr B. Woodcock, has, 30 static caravan pitches and 60 'static' tourers (touring caravans left on site all year round). The site has a low level of facility provision, comprising of toilet / shower block, warden's bungalow, store building and amusement arcade, and currently has an air of being slightly run-down. The site is linear in character, with all pitches spread along the coast within 40 metres of the cliff top. The site is protected along its northern half by a privately maintained concrete sea defence. To the centre of the site is a slipway to the beach suitable for launching small craft.
- 7.2.3 The site lies within the concentration of small sites along the coastal side of Southfield Lane between Ulrome and Skipsea. The site is experiencing coastal erosion at the point where the sea defences end, an area now given over to the static tourers. All the pitches are at risk from coastal erosion over the next twenty years, with the actual rate of erosion dependant on the maintenance of the sea defences. Since 2000, seventeen touring caravan pitches have been lost to coastal erosion.
- 7.2.4 The site owner has also owned Top View Caravan Park at Ulrome since 1996, a site around 800m back from the cliff top at Southfield Lane and well beyond the 100 year risk zone. Despite being under the same management this site differs considerably from Beachbank in scale and quality. Top View currently is licensed for 92 privately owned static pitches. There are no tourers on the site, and it is managed in such a way as to provide a very peaceful, low density and heavily landscaped site with an informal recreation area, but no entertainment facilities. All the units on site are of a high standard and are relatively new. As such it is a site proving very attractive to middle-aged and older tenants. It is particularly well screened from the village of Ulrome, despite it being located on the fringe of the settlement itself. Within the site there are considerable amounts of mature landscaping, and it is apparent that many of the tenants actively 'garden' in the areas around their pitch.
- 7.2.5 The site owner takes considerable pride in the standard and management of the Top View site.

Context to the Relocation Proposal.

- 7.2.6 The current owner purchased Beachbank Caravan Park in 1999, ostensibly in its current condition. The site at one time previous to this had been known as 8 Acre Field and accommodated between 200 and 300 touring caravans at peak times. During this period of ownership the site has gradually lost pitches to the sea. This has been viewed as both an environmental concern and serious business cost to the owner. Mr Woodcock has for many years taken professional advice regarding caravan park design and planning issues from Mr Howard Acklam M.B.I.A.T., an agent based in Scarborough. In response to the worsening situation, and given the significant costs likely to be incurred through the long term up-keep of the private coastal defences at Beachbank, (Figures 3 and 4) Mr Woodcock and Mr Acklam devised a strategy for the transfer of the Beachbank pitches to a field adjoining the rear of the existing Top View site.
- 7.2.7 In effect, this project constituted a hybrid of both relocation of an existing site, and 'pitch banking' from one site to another. The field to be developed had been purchased previously through an auction of an agricultural holding rather than as a result of a direct approach from Mr Woodcock to the land owner. Within economically reasonable limits, Mr Woodcock set about establishing advanced landscaping through bund-walling and planting in advance of making a potential planning application for the change of use of the land. Considerable experience in establishing effective screening of caravans through planting has been amassed

between the applicant and agent on this and other sites on the east coast of England, and this particular site lends itself to being very well assimilated into the landscape.

- 7.2.8 There are, therefore, some very site-specific circumstances regarding the feasibility of this scheme, in that there is common ownership of both sites, they are in close proximity to one another and the acquisition of land for the expansion of Top View was not subject to inflated values as a result of any 'hope value' on the land by the previous owner.

The Relocation Proposal

- 7.2.9 Proposed therefore was the submission of a planning application for the change of use of the 'new field' from agricultural use to extension of Top View Caravan Park. This proposal was very carefully considered, and made very much in the context of the development plan policy context for the area, in particular local plan policy CZ6 'Replacement Caravan Sites on the Holderness Plain'. The proposal was rehearsed with officers of East Riding Council who informally viewed the scheme favourably. The subsequent formal application for planning permission was made in October 2001, and accompanied by a detailed case for the proposal, including extensive details of the scheme and its phasing.
- 7.2.10 The proposal was for an equivalent number of pitches from Beachbank to be relocated within the new site. The proposal did, however, also propose an additional 10 pitches to be accommodated on the new site to compensate for the loss of the wardens bungalow, amusement arcade and toilet block from Beachbank, a figure supported in principle by the Council planning offers. This may be viewed as a multiplier factor being applied, although it was not considered as such at the time by the applicant, and merely reflected and compensated for the space taken at Beachbank by permanent structures.
- 7.2.11 Whilst the pitches were in effect to be transferred, in practice it is likely that only a small number of the caravan units from Beachbank would be re-sited at Top View. None of the static touring caravans would be accommodated within the new development, as all the new pitches are to serve modern standard static units. It is anticipated that new customers to Top View, or relocating clients from Beachbank would purchase new caravans for the new site to fill capacity.
- 7.2.12 The proposed layout of the new field at Top View was also proposed to be at a lower density than the existing site, reflecting the upward trend in standards of layout, design and landscaping which is becoming increasingly apparent amongst some of the other East Yorkshire coastal caravan sites. Surrounded by extensive block landscaping, the scheme as proposed consists essentially of 6 cul-de-sacs of approximately 12 caravans, serviced from a central drive, with amenity space and parking for each pitch.
- 7.2.13 Construction plant and delivery access to the proposed development site was to be from the North Turnpike Road to the north of Ulrome, facilitating an absolute minimum of heavy traffic to Top View through the village during the construction. On completion of the development, access to the site for residents would be from the existing entrance from Southfield Lane. Therefore no 'short cut' through the site from the main entrance to North Turnpike Road would be available.

Figure 3 -: Looking North towards Beach Bank Caravan Site – the coastal protection works can be seen to the right hand side, with the Barmston Beach site in the distance.

Figure 4 -: Coast protection works at Ulrome - with an unprotected area with caravans at risk beyond.

- 7.2.14 Given officer support, particularly in the latter stages of the preparation of the application, and the favourable planning policy context, the proposal to relocate the Beachbank pitches to Top View was expected to meet with formal approval. The applicant was conscious that there were wider benefits to be secured from this action, beyond the commercial attractiveness to his business at that time. Those wider benefits included the removal of touring caravan traffic from the local road network given that all new pitches would be for static caravans, the removal of a prominent site on the cliff top, and a relocation of a site in accordance with the aspirations of the emerging Shoreline Management Plan and the Integrated Coastal Zone Management Study. There would be only a very small net increase in the number of pitches as a compensatory measure for the loss of the Beachbank services.
- 7.2.15 The application package did not propose any specific details of the cliff top site reinstatement on completion of the transfer of pitches. The application documentation did however acknowledge that the site would be restored in accordance with the requirements of East Riding Council. Careful control over this operation by the council was fully expected by the applicant, as was the likelihood that this would be through a legally binding Section 106 Agreement.
- 7.2.16 As part of the application package, a detailed phasing schedule was proposed for the gradual clearance of Beachbank, and provision of new pitches at Top View. This rolling programme was proposed over seven years, although the first two, and final year of these were included to cover the establishment and completion of the landscaping which Mr Woodcock had previously undertaken. The phasing of the proposal from start to finish was set out as:
- a) Advance landscaping commenced.
 - b) Planning application submitted.
 - i. Further landscaping carried out.
 - c) Subject to planning permission, general works commence on site.
 - i) 25% of units from Beachbank removed.
 - ii) Equivalent number of pitches provided at Top View.
 - iii) Phase 1 reinstatement work at Beachbank.
 - d) Further 25% units removed from Beachbank and reallocated to Top View.
 - i) Phase 2 internal landscaping commence within Top View.
 - ii) Phase 2 reinstatement works at Beachbank.
 - e) Further 25% units removed from Beachbank and reallocated within Top View
 - i) Phase 3 internal landscaping works at Top View
 - ii) Phase 3 reinstatement works at Beachbank
 - f) Final 25% units removed from Beachbank and reallocated within Top View
 - i) Phase 4 internal landscaping works at Top View
 - ii) Phase 4 reinstatement works at Beachbank
 - g) Additional landscaping at Top View
 - i) Phase 1 sea wall removal
 - ii) Phase 5 reinstatement at Beachbank
 - h) Additional landscaping at Top View
 - i) Phase 2 sea wall removal
 - ii) Final reinstatement at Beachbank

7.2.17 The purpose of the phasing was primarily driven by commercial considerations. Whilst potentially a profitable exercise in the long term, the relocation of the pitches from Beachbank to Top View would entail considerable cost, which are to be initially covered by through a loan, the repayments of which are to be serviced through on-going site income. These costs can be broken down as follows.

Creation of new pitches and landscaping.

7.2.18 The establishment of the new part of Top View Caravan Site entails the laying down of new access roads, extensive mains services, concrete pitches and heavy internal and screening landscaping. It is estimated that this equates to around £6,000 per pitch at the proposed standard on the new site. 100 new pitches are to be created, 80 of which are within the 'new field'. The remaining 20 pitches being accommodated within existing established parts of the Top View site. A rolling programme of pitch creation also reduces the scale and impact of the engineering operations on the site at any one time, reflected in lower levels of constructional traffic and plant operation within the environs of Ulrome over the works period.

Loss of Income from Beach Bank.

7.2.19 Sites on Beachbank were proposed to be removed over four yearly phases. Whilst this reduces ground rent income from that site, there is no market certainty that the same number of pitches will be taken up by transferred, or new trade at Top View over the same season, or even the next season beyond that. Similarly, the remaining incomes received from Beachbank rents over the phased scheme continue to contribute to servicing the costs of the capital investment at Top View.

Reinstatement Costs at Beachbank.

7.2.20 Considerable outlay will be required to cover the reinstatement of Beachbank to the satisfaction of the Council. Unlike many other sites along the Holderness Coast, this entails the removal of the concrete sea wall defences to the northern half of the site. Genuine estimates for such work are in the region of £100, 000 as of the time of this study.

7.2.21 In the light of these economic characteristics of the project, Mr Woodcock is of the firm opinion that to concertina the transfer project over a shortened period would have the effect of raising the financial risk and burden to such an extent as to question the sensibility of the scheme vis-à-vis maintaining the Beachbank site as long as is reasonably possible.

7.2.22 The details of the phasing scheme were to become the critical aspect with regard to the acceptability of this proposal to the Local Planning Authority.

The Council Response.

7.2.23 The planning application for the transfer of pitches from Beachbank to Top View was submitted to the East Riding of Yorkshire in October 2001. In the view of this study the submission of plans and supporting statement was of an exemplary standard.

7.2.24 The application was handled by Mr Turner, reporting directly to the Development Control Manager, Mr Cook. Both officers had been actively involved in pre-application discussions with the applicant. Officers were supportive of the proposals, and in July 2002, 9 months after the submission of the application, the scheme was placed before the Northern Area Planning Sub-Committee of East Riding of Yorkshire Borough Council. The report to members made a recommendation of deferral with delegated authorisation of approval, subject to reaching

phasing and reinstatement agreement, secured through a Section 106 agreement, and subject to conditions.

- 7.2.25 The public consultation of the proposal solicited a number of objections from Ulrome Parish Council and local residents, essentially with regard to the overwhelming impact of caravan sites on the village of Ulrome, and other localised issues. However, the scheme was considered by officers to be in accordance with the development plan, subject to the application of conditions and the securing of a Section 106 Agreement covering the restoration of Beachbank.
- 7.2.26 On consideration of the proposal, members raised concerns over the phasing programme for the transfer of pitches and reinstatement of Beachbank. However, they were otherwise convinced that the proposal was in accordance with policy and was acceptable with regard to site specific impacts. Consequently, the application was deferred, pending the completion of a legal agreement covering various aspects of caravan removal and relocation, and the time scale for the reinstatement of Beachbank. On reaching such an agreement, the Director of Planning was authorised to grant permission on receipt of an acceptably revised phasing scheme, in consultation with Members.
- 7.2.27 Specifically, the concerns of Members over the phasing period appears to have been centred on an extended period of local disruption thought to be likely as a result of the constructional activities and movements around the settlement of Ulrome, and on Southfield Lane between the two sites. Concerns were also expressed over the ability to ensure a firm guarantee that at the end of such an agreed period, the reinstatement works would be satisfactorily completed at Beachbank.
- 7.2.28 Constructional disruption within the locality was not however anticipated as being a potential problem by the applicant or the officers. As previously noted, construction traffic would enter the site via a remote entrance away from the village, and the construction of new pitches within Top View would be further from the village than the existing pitches, already substantially screened by mature landscaping. With regard to a legal agreement for the reinstatement of Beachbank, the applicant had already offered his willingness to have to enter into such a commitment, not least by the fact that the relevant policies within the local plan indicated that this would be required.
- 7.2.29 The planning application, at the time of this study has remained in a state of suspension for 19 months, pending progress on the terms of a legal agreement.
- 7.2.30 Through discussions with the applicant and Mr Cook it would appear that the substantial delays have been caused by a number of separate issues, although these have been at the instigation of the Council. In his role as negotiator with the applicant, and representative of the members, the Development Control Manager has been conscious that there must be a tangible improvement to the relocation phasing period in order to convince members that improvements have been secured within the terms of the S106 agreement. There has therefore been a protracted period of discussions between the Council and the applicants.
- 7.2.31 These negotiations have taken place between Mr Cook, Mr Acklam and Mr Woodcock, and can be summarised as follows:
- In April 2002, Mr Acklam provided the council with detailed responses to a series of questions from Mr Turner regarding the phasing of the project, specifically with regard to sea wall removal and other detailed operational issues at Top View. The applicant forwarded a prompt and full response to all the council's queries, which, it would appear, did not raise further issues of concern.

- September 2002, Further discussions and exchange of details took place between the applicant and officers, with the purpose of discussing the terms of a legal agreement. Here, the commercial realities of phasing the transfer of pitches from Beachbank to Top View were fully set out before Mr Cook and Mr Turner, highlighting the financial implications of each part of the project. At this meeting the issue of the proposed Yorkshire Forward roll-back study first emerged, and was put to the applicant that such financial grant aid *may* potentially assist in this particular project.
- 3rd October 2002, letter from Mr Acklam to officers, offering a revised schedule for the engineering works at Top View with effect of reducing the phasing to 3 consecutive years as oppose to 4 as originally proposed within the planning application on the new field. The letter also made commitment to extremely stringent details of deliveries to Top View during said construction. This reduction in the phasing period was not taken lightly and was possible in part by the loss of further pitches to the sea.

7.2.32 As noted, during this latter stage of the protracted period of negotiation, the proposal for the Holderness Roll-Back study, under the commission of Yorkshire Forward emerged. This raised the prospect of potential awards of grant-aid to facilitate pilot projects of roll-back proposals, and to advise the council on the adequacy of the policy and guidance framework to enable such schemes to be realised. It was evident to Mr Cook that such grant aiding of roll-back schemes may possibly become available to Mr Woodcock. As a result of this, in anticipation of the outcomes of the Roll-Back project, the applicant agreed to remain patient, and to hold back on the revised schedule to members in the hope that the findings of the study may release some financial assistance to facilitate a further shortening of the phasing of proposals or the enhanced restoration of the Beachbank site. Mr Cook felt this would then constitute a persuasive enough case to convince Members to agree the terms of the new phasing programme

7.2.33 Unfortunately for both parties, the momentum for the launching of the Rollback study was subsequently checked through personnel changes within the Council, with the effect of delaying the award of the contract to consultants to carry out the study by several months.

7.2.34 At the time of this study (June 2003), this case has not yet been resolved, and the application remains in abeyance to the mounting frustration of the applicant, but also to the concern of the Development Control Manager. As a consequence of awaiting the outcome of this study, potential financial assistance or guidance which may be offered by its findings have now become critical considerations in how the application might be finally resolved.

Comment and Analysis

7.2.35 This case study illustrates a number of issues, but particularly how even superficially straight-forward cases of caravan site relocation may become complex and politically sensitive.

7.2.36 The Beachbank –Top View proposal on the surface has offered a simple and advantageous opportunity to realise the objectives of the ICMP with regard to the movement of cliff edge and at risk caravan sites being relocated away from the at risk zone, to more sustainable sites which are well assimilated in landscape terms. In many ways it is difficult to envisage a set of circumstances where the opportunity for such a move would be more straight-forward.

7.2.37 As set out in detail above, the scenario is one of a poor quality site with significant landscape impact and experiencing active erosion, having its pitches transferred to a nearby site of high quality, well screened and beyond the 100 year risk zone. Both sites are under the same ownership and management. The project was not initially dependent on public finance and

would have resulted in the removal of a privately owned concrete sea defence and restoration of the cliff top.

7.2.38 Pre-application discussion between officers of the Planning Authority and the proponents of the scheme were open and positive, and concluded with the submission of a high quality planning application. It was at the point of Member involvement that unforeseen complexities arose and which have since been further confused by the potential outcomes of this particular study.

7.2.39 Essentially, it can be seen that the obstruction to a positive outcome of this proposal has been due to two factors, the first of which has serious ramifications for the future handling of similar proposals by the East Riding of Yorkshire Borough Council, the second of which is unique to the timing of this proposal. These issues are expanded as follows:

Economic Realities and Phasing of Pitch Transfer.

7.2.40 Central to the viability of this project was the need for it to be spread over a number of years. 'Phasing' is considered necessary in order to soften the impact of meeting the large capital outlay required for the new pitches, to maintain a steady level of income from remaining pitches to help fund this, and to gradually secure new tenants to the new pitches.

7.2.41 The scale of the financial outlay for the project should not to be underestimated. The project entailed the creation of 100 new, well serviced pitches, mostly within an existing site extension, to be heavily landscaped and accommodated close to established pitches within Top View. The average cost of providing each pitch is claimed to be around £6,000, a figure consistent with the findings of this study elsewhere in Holderness for well serviced new sites. This alone suggests costs of well over half a million pounds. Thereafter, the cost of removing the pitches and buildings from Beachbank, along with the careful removal of the sea defences, and restoring the site to a semi-natural condition inflates the overall project costs to somewhere in the region of £750,000.

7.2.42 Compounding the capital costs of this work is the fact that during the phasing of the scheme, the income from the total number of pitches between the two sites will drop in the short term as a result of the lag between pitch removal at Beachbank, pitch creation at Top View, and the successful marketing and letting of the new pitches to existing or new tenants. With respect to the proportion of tenants moving from one site to the other, given the upward shift in quality, and subsequent increased ground rents from those existing at Beachbank, the likelihood is that new customers would take up the new pitches rather than the current Beachbank tenants.

7.2.43 It can be reasonably assumed that for a relatively small business (in caravan park terms), such as that run by Mr Woodcock at the two sites, that this scale of undertaking constitutes a significant financial commitment and risk. Whilst clearly a business based decision to commit to the project in the first place, there are nevertheless risks and uncertainties associated with it. Over the period of time which has seen the planning application flounder, such issues have become more significant.

7.2.44 Mr Woodcock is particularly conscious of the potential for changes in interest rates affecting the viability of his scheme, with potentially significant personal consequences. The funding of the project is to be through a loan, which he will service through the incomes from the new site. The favourable level of interest rates at the time of this study clearly is beneficial in two ways to the proposal. Firstly, repayments are affordable on estimated incomes from the new scheme. Secondly, and critical to the marketing of the new pitches, is the relative buoyancy in the market for good quality mobile home sites currently enjoyed on Holderness and elsewhere within the UK. An upward shift in interest rates will affect both his repayment

burden and reduce the attractiveness of borrowing by potential customers on the site, who might otherwise invest well over £20,000 for a new static caravan. In combination this could cause a very serious problem for the business.

- 7.2.45 Another consequence of the delay in processing this application is the impact of an upward shift in quality of static caravan sites elsewhere on Holderness over the recent past, which is creating greater competition within the market sector in which Top View would operate. This has further dented the confidence of the owner to continue with the proposal as first envisaged.
- 7.2.46 Given the financial scale of this proposal it is perhaps not surprising that the applicant would wish to spread both the risk and cost over a number of years. This was very carefully considered in the preparation of the planning application, but when placed before the Planning Committee was questioned, although it is unclear how thoroughly members scrutinised its detail.
- 7.2.47 Officers sought to gain the support in principle for the proposal, with a recommendation of deferral in order to negotiate an appropriate section 106 agreement, concern over the extent of the phasing was not expected. The details of the phasing of the project were not set out within an otherwise very comprehensive committee report, although an overall time scale of six years was noted. Nevertheless, members expressed that within the negotiations, officers should seek to secure a shrinking of the period over which the development should take place. Whilst the minute to the committee item does not reflect the debate, Mr Cook recalls that this was in order to reduce the impact of traffic on the road network around, but particularly between, the two sites, and to minimise disruption caused by construction on the site to the residents of Ulrome. Members were also concerned that the longer the period of transfer lasted, the greater the probability that the restoration of the site at Beachbank would *not* occur.
- 7.2.48 This raises the significant issue of whether or not there was or is an appreciation of the financial scale of the proposal or the implications of a phasing shrinkage by the membership, or whether it was not, in their opinion a relevant matter in land use planning terms. It also raises the issue of whether there was a political component to the decision to shrink the phasing period. Whilst the scheme was compatible with development plan policy, Member requirements may well have been stimulated to reflect sympathy to the concerns raised by local residents to the proposal.
- 7.2.49 What is not clear at this time is whether the Members were aware that the finer grain details of the phasing scheme actually incorporated a four year rolling programme of pitch removal and reinstatement, with the first and final years of the scheme being taken with continued landscaping of Top View and reinstatement at Beachbank. This clearly may have appeared less 'alarming' than the six year period of the project in its entirety.
- 7.2.50 Nevertheless this issue has clearly caused concern and subsequent delay in the realisation of the proposals aims.

Delay in Anticipation of this Study's Recommendations

- 7.2.51 The second significant factor in the failure of this application to proceed beyond the formal planning application stage is unique to this particular case, and highly unlikely to be relevant to other similar schemes.
- 7.2.52 The Development Control Manager found himself in a difficult position with regard to satisfying the wishes of members, whilst at the same time sympathising with the situation

of the applicant. He was conscious of the need to offer members some improvement on the phasing of the scheme before concluding the details of the scheme and its S106 agreement, and was aware that to do otherwise may place the approval agreed in principle in danger of being reversed.

7.2.53 In the negotiations between applicant and officers as noted above, an offer of reducing the phasing of the caravan relocation and site reinstatement was made by the applicant. It was during this negotiation however that the possibility of grant aid through Yorkshire Forward Funds for pilot relocation schemes emerged. In September of 2002 the application in effect was put 'on ice' pending the outcome of this study with regard to the use of public funds to facilitate the roll-back of threatened caravan sites on the Holderness coast. At that time the prospects for the commissioning of this study were imminent. However, unforeseen personnel changes within the Council's sustainable development office delayed the tendering process until April 2003. In effect the application has remained in a state of suspended animation since that point.

7.2.54 No lessons from this unique second factor of delay are likely to be relevant to the wider lessons to be carried forward for other rollback projects.

Conclusions and Recommendations

7.2.55 The delay in the processing of this planning application, and hence the realisation of a potential landmark proposal to remove a cliff top caravan site to a sustainable location in accordance with the objectives of the ICZMP can be seen to be attributed to:

- A breakdown in communication, understanding – or reluctance of the council planning control members to appreciate, or accept commercial and financial realities of caravan site relocation of this nature, and,
- Delays incurred through an expectation of access to future financial assistance to facilitate such projects.

7.2.56 Notwithstanding the merits of the latter point, this case study illustrates that the relocation of large scale relocations of static caravan pitches will inevitably entail a very large financial commitment on the part of the owner. For relatively small businesses without the backing of a larger parent company, this process will stand or fall by the ability to proceed over a period of carefully balanced investment and retention of income from existing pitches, extending over a number of years. This is more so the case where the project sets about to upgrade the standard of facility where the transfer of existing custom is far from guaranteed.

7.2.57 Therefore in the light of the policy recommendations of this study, and the principles for the use of public funds to facilitate a planned retreat of the caravan parks within the risk zone, the following recommendations are offered with regard to reaching a solution to the current hiatus at Top View and Beach Bank sites :

- a) The current phasing proposal as proposed to officers in October 2002 is reasonable and realistic, and a further shrinking of that period unreasonable without financial assistance at a scale or focus which would not be in accordance with the principles of allocating public funding, as offered by this study (see chapter 6.). Concerns of members may be valid in principle, but this study does not support the extent of those concerns or consider the use of planning conditions and S.106 Agreements to be insufficient to ensure a satisfactory implementation of this proposal. The study does not therefore recognise the need for any further shrinking of the phasing of the

proposal, or that to fail to do so should justify any further delay, or indeed a refusal of this proposal. It is suggested that a refusal would be difficult to defend with any degree of confidence at a subsequent appeal. The award of costs against the council for unreasonable behaviour in regard to such a scenario could not be discounted.

- b) Grant aid for the full and proper removal of the sea defences and restoration of the Beachbank site to a semi-natural condition, to an amount of half the actual cost, be made available to the applicant. The details of the restoration and timing of the stages of sea defence removal and restoration, in accordance with the offered phasing programme, be secured within a S.106 Agreement.
- c) Negotiations to finalise the terms of a S.106 Agreement should be started immediately to facilitate the earliest possible opportunity for the Director of Planning to authorise the approval of the planning application for the relocation of Beachbank pitches to Top View Caravan Site.

7.2.58 In addition to these specific recommendations, a general observation is also offered which proposes that a strategy for the managed rollback of the at risk sites within the Skipsea-Ulrome concentration is prepared.

7.2.59 The Beachbank case taken in isolation from its locational context, with regard to the other sites at risk in its vicinity and the existence of adjoining privately maintained sea defences, offers only a partial solution to the objectives of the ICZMP. Removal of the sea defences at Beachbank will have potentially significant consequences for the effectiveness of the neighbouring sea wall, with rates of erosion in the vicinity increasing as natural processes 'catch up'. The landscape, biodiversity and public access advantages of the reinstatement of Beachbank will therefore be offset by the retention of those other sites along the seaward side of Southfield Lane.

7.2.60 Nevertheless, the Beachbank case does offer a potentially significant opportunity for the demonstration of how ICZMP and economic objectives and can be achieved.

7.3 Case Study 2 : Sand le Mere, Tunstall

Location and Landscape Setting

- 7.3.1 Sand le Mere is a relatively isolated site, the nearest caravan parks being a group at the northern end of Withernsea, 2.5 miles south along the coast. The site at Aldborough is approximately 6 miles directly along the coast to the north.
- 7.3.2 Tunstall is described as a hamlet in the Holderness District Local Plan, with a tightly drawn development limit designed to protect the character of the settlement. The church is noted as a Grade 1 Listed building, for which preservation of its setting is likely to be an important consideration, though existing agricultural buildings on the north side of the village already have a significant impact in this respect. The plan refers to the caravan site, expressing the planning authority's preference for any further development to be contained within the existing boundaries, rather than by extension of its area.
- 7.3.3 In general terms, the landscape of this part of the East Riding coast is slightly more undulating than some others. Approaching from Withernsea to the south, the B1242 road passes over a relatively high point at Waxenholme. From this point Sand le Mere is prominent and unattractive, appearing as a rather alien feature on the cliff top with little to screen the ranks of pale coloured caravans close to the cliff. Travelling further north, the road passes through a series of hollows and the Tunstall Drain. The landscape to the east is characterised by a ridge of higher ground, with a series of large farmsteads set in large fields, and some woodland. The caravan site is less visible until off the B road and closer to Tunstall itself, but one of the most conspicuous features of the site is the line of flagpoles along the northern boundary near the entrance.
- 7.3.4 Sand le Mere is "brown signed", and the road to the site takes visitors through the hamlet at the southern end of Main Street. Seaside Lane then runs some 700m directly east from the edge of the settlement, before turning south-east by CoastGuard House. Gappy vegetation allows some views of the site across the large open arable fields, with the tops of vans forming a continuous line of development together with the large buildings of Cliff Farm just to the west. Seaside Lane passes another small group of residential properties as it runs parallel with the coast for the last 300m into the site. The road way effectively ends with the access down to the beach at the south-east end of the site. This beach access is perhaps the only one between Withernsea and Hornsea.
- 7.3.5 Seaside Lane has a fishing atmosphere due to the fishing boats, tractors which tow them to sea, and nets and pots lined up alongside the road. A compound towards the southern end of the cliff frontage is owned by the caravan site, but the boats it contains are privately owned. from close to the site, but in general it is inconspicuous and only noticed by those entering or leaving the site.
- 7.3.6 There are no obvious problems with the current use of these access approaches to the site, though an alternative route more direct to the Withernsea road might avoid nuisance and congestion through the middle of Tunstall in peak season. There was some local opposition to suggested alterations to Kilnhouse Lane (see planning history below), which turns south off Seaside Lane just outside the hamlet. This leads down to Cliff Farm and the rear of Tunstall Hall. As well as the residential buildings, there are a number of substantial agricultural buildings, including a large pig-rearing unit. Those attached to Cliff Farm and its yard effectively back on to the touring site (see below). The buildings at the rear of the Hall are set in a shallow dip, but are only a little over 100m from the edge of the main site.

- 7.3.7 The O.S. 1:25000 sheet shows a footpath leading from the nearby village of Roos to the west, passing through arable fields around Cliff Farm and Tunstall Hall, through to the site itself, and down to the beach. This links with others which run to Tunstall. There is also a footpath which runs alongside the Tunstall Drain, a little further to the south (see below).

Existing Size and Infrastructure

- 7.3.8 This is a relatively large site, approximately 14ha (35acres), and is licensed for 575 static caravans. Currently there are 440 private statics on the site, and an additional 27 which are rented out by a private holiday company. There are also 10 holiday chalets, and 20 touring caravans. The site is probably unique on the East Riding coast in having 16 units (part of the 467 total) which benefit from a licence for 12 month occupancy, located at the north eastern end of the site. The site has been in the ownership of one family for some 40 years, and the owner's dwelling house is also in the north eastern part of the site.
- 7.3.9 The current layout is largely regimented, and fairly uniform, with no current sectioning to create a sense of place in different parts (Figure 5). Although there is some landscape planting, both within and on the margins of the site; and there are well tended flower beds (much of which uses plant material grown on the site) in reality this does little to screen the site from external views, not does it break up the appearance of the rows of caravans when inside the site. Units are of varying age, but the site is tidy and well kept. The pitches themselves are relatively small by modern standards, and are probably too small to accommodate the size of caravan which today's customer demands. This means that when an existing caravan reaches the end of its life, it is difficult to redevelop the pitch unless there are a number together. Together, all of this gives the impression of a well run site, but with a somewhat old fashioned appearance.

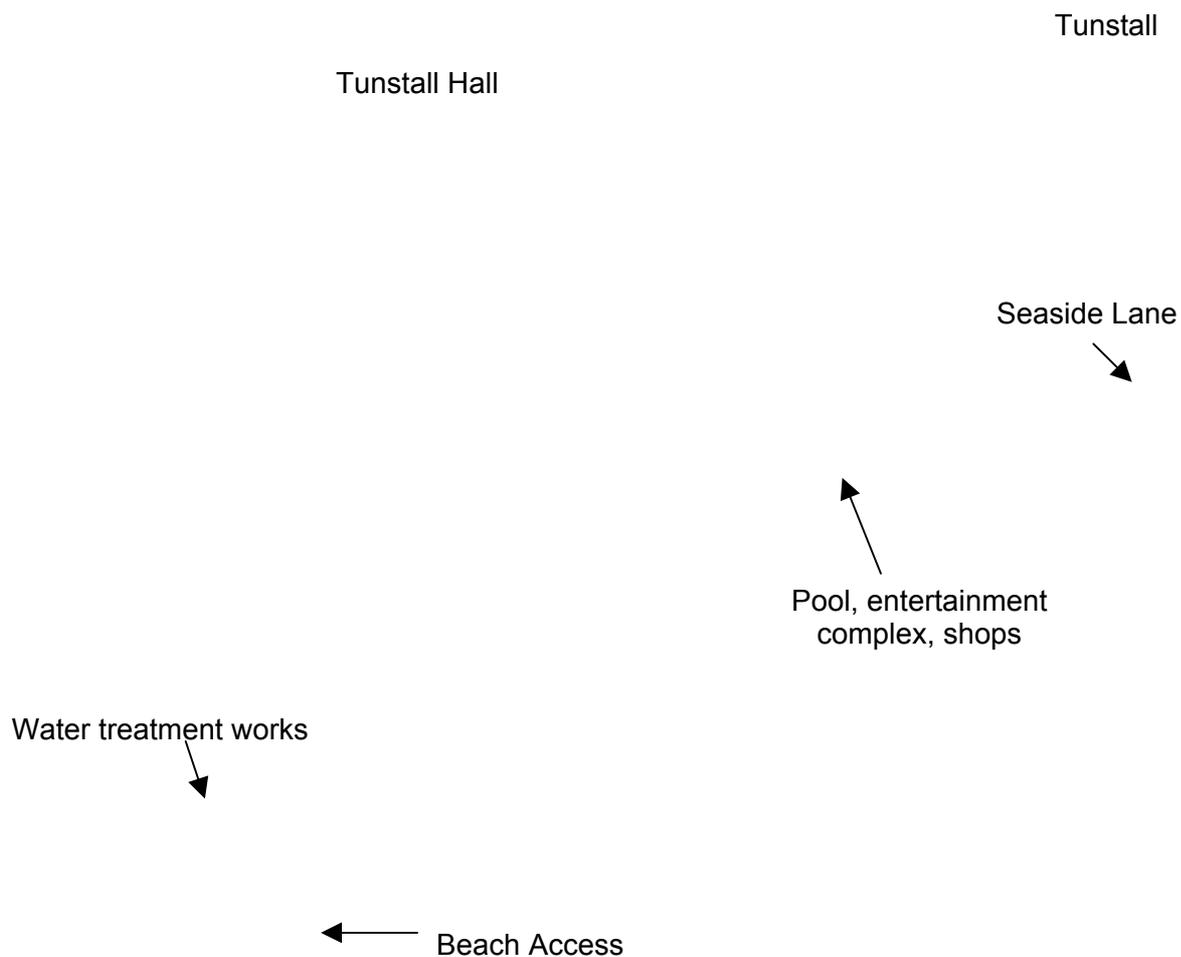


Figure 5 -: Sand le Mere from the air

7.3.10 The parts of the site nearest to the cliff include the water treatment plant and the boatyard; but also a hard-surfaced area used for marketing and display of vans for sale. Behind the road there is a large amount of infrastructure close to the entrance. This includes offices, reception and shop buildings. Beyond that there is a complex of leisure facilities, small and large bar areas, restaurant and entertainment hall, with a total capacity of approximately 400 people at any one time. An open air swimming pool is adjacent to a childrens' play area, with some exercise facilities, jacuzzi and sauna. Along the seaward side of this group is an amusement arcade, bingo room and café. Non-resident members of the public can use some of these facilities on a day ticket basis, as long as the site is not already full; and some from the village do so.

7.3.11 The fishing lake at the southern end of the site is not open to non-residents.

Planning History and Policy Background

- 7.3.12 Use of the site for siting caravans began prior to the 1947 Town and Country Planning Act coming into effect. Records for the site are incomplete, but it has been accepted that in the main, the site has established use rights. Planning permissions have been granted for the erection of buildings over the years, but there do not appear to be any conditions on these requiring removal or restoration when no longer in use; and no conditions restricting the substantive use of the site. The main controls and limitations come from the licence.
- 7.3.13 In 2002, a planning permission was granted for a small extension to the rear of the site, adjacent to Cliff Farm, to accommodate some additional touring caravans. That permission has been implemented, and the field is in use. Significantly, it contains a requirement that if it is intended to use Kilnhouse Lane to access the land, a scheme of works to the lane must first be approved and implemented. At present, it is not clear what those works would entail, but probably involve widening, surfacing and possibly strengthening. However, at that point it would be necessary to obtain access for the site as a whole, not just the touring extension; and it is also not clear if works to access the touring site would be adequate for access for traffic to the main site.
- 7.3.14 Planning permission has also been granted in 2003 for operations which include both some flood defence (a small bank extending south) and an element of coastal protection works. These are discussed below.
- 7.3.15 The site falls to be considered under the policies of the Holderness Local Plan, and is in the undeveloped coast. Therefore policies Evv5, Env 9 – 11 and Tm1, and Tm3 – 7 are the most pertinent. There are no designations or other policy constraints particular to this site or stretch of coastline.

Employment and Market

- 7.3.16 Sand le Mere has developed a particular niche in the market. It is in a relatively remote location, compared with many other sites, but benefits from being immediately next to the sea. The owner reports that overwhelmingly the clientel is drawn from the Yorkshire conurbations, and is very much weekend and school holiday focussed. A large percentage of are families attracted by:
- The seaside location
 - a good range of facilities for children
 - relative peace and quiet which the isolated location provides
 - economical pricing of goods and services on the site.
- 7.3.17 However, within and in addition to the family market, sea and beach fishing (via the boats held in the compound) and fresh water angling in the lake constructed in the south of the site are important in the “shoulder seasons”. The fresh water lake is seen as particularly and increasingly important to the economic operation of the site.
- 7.3.18 The site has four crowns under the Yorkshire Tourist Board scheme. The owner considers that this gives them something of a marketing edge over sites not in the scheme. He considers that the facilities are up to five crowns standard, but recognises that the relatively mature age and condition of some of the units gives an overall score of four. The owner does not see this as an important issue, and indeed considers that many clients are happy with the situation, perceiving good value for money in that balance – ie they feel that they are getting a five crown site for the price of a four crown site.
- 7.3.19 Even though visitors enjoy the coastal location, the owner’s view is that for most families,

child visits to the beach need to be accompanied – they cannot stay at the caravans while children play there. The consequence is that most customers would probably be prepared to move one mile or so inland if necessary, as long as easy beach access was available.

- 7.3.20 In addition to the site owner, Sand le Mere provides full time employment for 10 people, a further 10 jobs on a part time basis all year round; and between 25 and 30 part time seasonal jobs. Many regular activities and construction projects are carried out “in-house”; others employ local firms.

Relationship to the Coast

- 7.3.21 On this stretch of the coast, erosion rates have experienced spells of rapid cliff retreat – for instance in the late 1980’s and early 1990’s annual rates (posts 39 – 41) sometimes exceeded 6m. More recently rates have been relatively low, but may be increasing once more, especially just to the north of the site. Overall, it is predicted that the coast in this area will erode at an average rate of approximately 1.5m per year over the long term. However, this could hide localised variations laterally, and over time, for the following reasons. Firstly, there are a number of former tank traps on the beach close to the access, which may be providing some limited temporary protection.
- 7.3.22 Secondly, the coastal protection works designed mainly to protect the water treatment facility would also protect vulnerable parts of the site – such as the freshwater fishing lake - from inundation by the sea. An application for consent under the Coast Protection Act of 1949 is currently being considered, and an appropriate assessment is being undertaken in accordance with the Conservation (Natural Habitats & c.) 1994. If the Coast Protection Act consent is granted, this aspect of the planning permission can be implemented.
- 7.3.23 Thirdly, a short distance to the south is the Tunstall Drain, leading westwards, and which takes water from, among other areas, the caravan site . The Environment Agency currently has coastal defences protecting this facility. These are inspected and erosion rates monitored closely; and remedial works are undertaken to carry out repairs. However, the Agency recognises that, in time, it is inevitable that the march of erosion will lead to the protection works being progressively “out flanked”, making them unsustainable over the long term. Therefore, the Agency has carried out preliminary investigations to assess potential retreats of the defences westwards, possibly as far as the Withernsea road, with areas inundated by the sea possibly becoming salt marsh.
- 7.3.24 These potential options are acknowledged in the Shoreline Management Plan, but the Agency does not currently have any plans to implement such a scheme within the next 10 years or so. That is not to say that this situation might not change if other factors come into play.
- 7.3.25 These hard points along the coast can create variations in the rates of erosion, and less predictable patterns in the short term and over short distances, especially if scour occurs to the south of each feature. However, over a period of 100 years, the prediction of an average of 1.5m cliff loss per year remains probably the best estimate.
- 7.3.26 All of these factors have a bearing on the investment decisions of the site owner. Most are discussed below, but at this point it is worth considering that the owner’s advisors consider that decisions of major lending bodies can sometimes be affected by short spells with high rates of erosion, even when there is good evidence that predicted long term averages would lead to cliff retreat an order of magnitude lower. This may mean that obtaining necessary finance could depend heavily on moving site areas back well beyond what is, in reality, likely to be the position of the cliff in 100 years time.

- 7.3.27 The site is relatively “square on” to the cliff, rather than being spread along the coast. In terms of what is likely to be threatened by erosion in the short, medium and long term, the most pressing issues relate to infrastructure. The approach road, water treatment plant, water main and boat compound would be the first to be threatened by erosion, the first three of these being essential. The continuation of Seaside Road within the site is approximately 30m - 40m from the cliff edge at present. At a rate of 1.5m per year this means that the cliff would reach the road in approximately 20 years, and would place it at risk long before then. Problems of maintaining the beach access and securing the future of the water treatment plant will come much sooner.
- 7.3.28 Again, taking an annual erosion rate of 1.5m per year, all of the infrastructure immediately behind the road would be threatened within 100 years, along with approximately 60 – 70 pitches. If a more precautionary approach is taken, then a risk zone 200m deep would cover a further 60 or so pitches.

Rollback and Relocation – General Approaches

- 7.3.29 There are a number of general factors which need to be considered before examining options for rollback or relocation of this site in more detail. These are reflected in the current views of the site owner and his advisors.
- 7.3.30 The need to relocate infrastructure is seen by the owners as fairly urgent, probably starting within the next three years. However, substantial redevelopment would require greater certainty than exists at present both in the planning system in general, and particularly with respect to site access – this uncertainty applies to the last section of Seaside Road being threatened in the foreseeable future. It also relates to what might be required for the upgrade of Kilnhouse Lane, whether this would be enough to service the whole site, not just the touring site; and whether there might be a more general objection to altering what is currently a quiet rural lane with long-standing features. Lenders may be more reluctant to supply funds in those uncertain circumstances.
- 7.3.31 If the planning permission for coastal protection works for the water treatment plant is not to be renewed in the future, relocation of that facility has to be considered. The costs associated with this would not only include the construction of a new plant itself. It would also include reconnecting the caravans, taking the drainage in a different direction to the new facility.
- 7.3.32 It has also to be borne in mind that at this site a rollback approach, as opposed to whole site relocation, would tend to require less borrowing; but at the same time would yield less increase in customer return to pay for that borrowing. This is because the first items of development which would have to be relocated would be infrastructure related, rather than pitches and caravans.
- 7.3.33 Another important consideration is that there might be some economy of scale in buying a whole farm unit for a new site, as opposed to a smaller area (part of a farm) for partial rollback.
- 7.3.34 The cost of reinstatement of vacated areas is recognised as potentially substantial, with pitch removal almost as expensive as making new ones; but to date relatively little detailed consideration has been given to this issue and that of future after-use.
- 7.3.35 Many of these factors, together with the need to minimise disruption to existing customers

(eg through construction noise), are linked to the issue of phasing. Additionally, there is a need to carefully consider the phasing of “decanting” parts of the site further away from the coast. This should include consideration of disruption and noise effects of construction, constraints on funding supply and the relationship to the size of the site.

- 7.3.36 The site owner has been exploring options for rollback and relocation for some time, including some discussions with forward planning and development control staff from the Council. However, although there is a good awareness of the scope of likely cost areas, no detailed assessment of costs and practical problems has been carried out in connection with potential sites and methods. Nevertheless, although the possibility of a progressive rollback has not been discounted by the site owner, in light of the above factors, the current view is that a whole site relocation is likely to be preferable. The owner’s “ball-park” estimate is that relocation would cost in the region of £5 million. Concerns over the access and the water treatment plant in particular mean that a substantial move may be sought within 3 years.
- 7.3.37 To achieve this, the owner would favour a rapid change over, keeping the existing site open while a new one is constructed in a single year; then transferring caravans where possible and bringing in additional new units over the winter period to reopen the following season

Multiplier

- 7.3.38 In order to relocate the entire site, the owner estimates that a pitch multiplier of approximately 1.4 – 1.5 would be needed to absorb costs and disruption to existing business before investment begins to produce some return. Some additional infrastructure may be needed, for instance the provision of an indoor pool as well as an outdoors one as at present. There is also the potential to create an improved layout, divided up into sections and enhanced internal landscaping; and much improved external, structural screen landscaping would also be needed. Because of these factors, and the need to provide larger pitches to accommodate larger caravans – a particularly important issue at this site – a site area multiplier of approximately 1.75 might be needed.
- 7.3.39 If these multipliers were applied, it would result in a new site area of approximately 25ha (61 acres) – increased from 14ha (35 acres); and approximately 700 pitches (up from 477, including chalets).
- 7.3.40 A not inconsiderable factor to consider would be the 16 units on the current site which have a 12 month residency licence. Some of these are relatively old, and may not transfer easily without deterioration. There is a legal obligation to provide accommodation of the same standard, as opposed to the mutually acceptable arrangements which tend to be reached with other pitch renters where possible. It is estimated that this obligation could lead to costs of between £400K and £500K. There might be the option to leave this part of the existing site in place, and not include it in the relocation. However, this might run counter to some of the potential sustainable development benefits identified for such a scheme.

Potential Sustainable development benefits and disbenefits

- 7.3.42 **Landscape** – The existing site has a poor visual quality, and is an alien feature on the cliff edge, especially in longer views from the south. A gradual rollback could be combined with improvements to the remainder of the site (by imposing planing conditions), but a significant multiplier would be needed, further increasing the potential for visual impact.

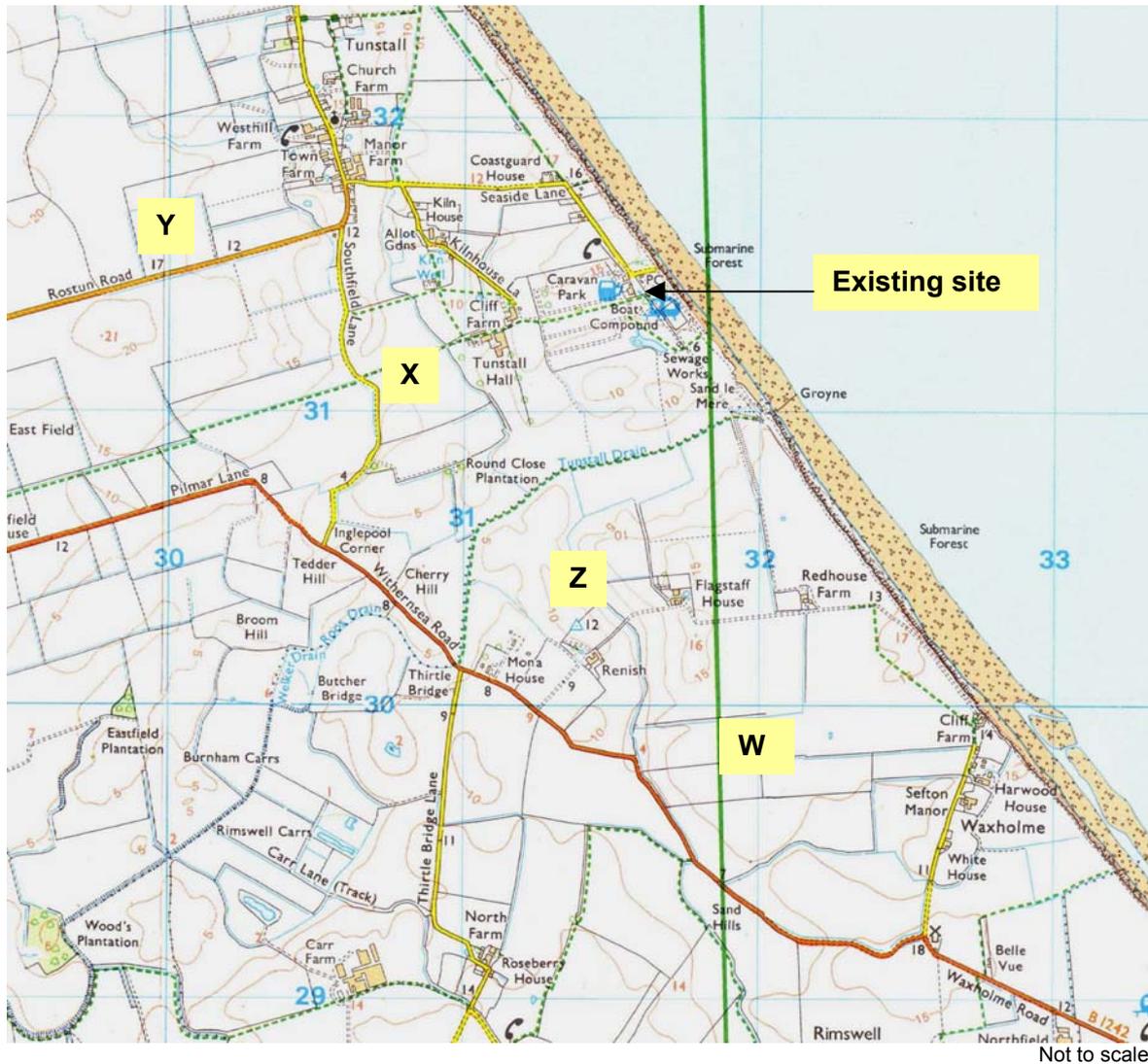
There is potential for a new site, coupled with removal of the existing one and sensitive restoration, to present a net benefit in those terms. However, finding a suitable and less intrusive location for a new site may in practice prove difficult. Although overall this Study has indicated that landscape issues are not so profound as to dictate against relocations in principle, the visual impact of an enlarged site may prove unacceptable in the particular circumstances of this case, should a suitable location not be available.

- 7.3.43 **Quality improvements** – As described above, the age of the site and its current layout indicate that a new site could present substantial improvements in the quality of the visitor experience. Not only could larger, better landscaped pitches with newer units be provided; but also modernised site facilities.
- 7.3.44 **Access** – Road access to the current site will at some point have to be altered as the cliff edge parts of Seaside Road become threatened. A new site presents the potential for a new access taking traffic away from Tunstall itself; and could avoid works to upgrade Kilnhouse Lane, currently a quiet rural lane whose character would be altered. However, it would have to be recognised that if the relocation site has more pitches, traffic on the surrounding roads (mainly the B road to Withernsea and through Roos) would increase a little.
- 7.3.45 In terms of **public access and rights of way**, a vacated and restored site could enhance what is already provided in the way of footpaths, exploring opportunities to link up with other paths in the area – such as the one alongside the Tunstall Drain. Consideration might be given to securing road access to the beach and the rights of way network for the benefit of the wider public – perhaps skirting a new site, and forming a modest parking facility at the coast.
- 7.3.46 **Biodiversity** – vacating such a large site would present a substantial opportunity to enhance the biodiversity interest of an area otherwise dominated by intensive agriculture.

Potential sites

- 7.3.47 In the context of the above, possible relocation and rollback areas have been examined as set out below, and as shown on Figure 6. A major constraint is the need to take into account possible Environment Agency proposals for the retreat of Tunstall Drain. Although this can also be seen as an opportunity with which development proposals could assist and integrate, the primary imperative is to avoid land which might be inundated – essentially all the low-lying areas below the 5m contour. Clearly, this will limit the ability to use the location to hide and screen development. This needs to be borne in mind when reading the brief assessments below.
- 7.3.48 The emphasis is largely on landscape and visual impact, and how this might compare with the existing site, as described above. Making a rollback or relocation site acceptable in those terms is likely to be the main difficulty in this case, in our opinion.

Figure 6 - : Sand le Mere Option Areas



7.3.49 **Area X** comprises land to the east of Southfield Lane, as far as Kilnhouse Lane, Cliff Farm and Tunstall Hall.

7.3.50 There is some potential to use this land, although the northern end would be too close to residential properties, and some forms a small ridge. Views across this area from the junction of Southfield Lane with Rostun Road already have something of a back-drop of development, with farm buildings and other properties, as well as the caravan site beyond. Further development close to the pig unit would run contrary to local plan policies (400m proximity limits), and there may be conflicts with maintaining viable agricultural unit unless the whole farm were to be purchased. Existing woodland could be used together with further advanced planting to provide effective screening to a large extent. Access off Southfield Lane (avoiding the centre of the hamlet entirely) would probably not be a problem, subject to overcoming conflicts with whatever agricultural enterprises remained; which again would depend on what could be purchased. It might be possible to screen parts of a development on the southern area from views from the B road.

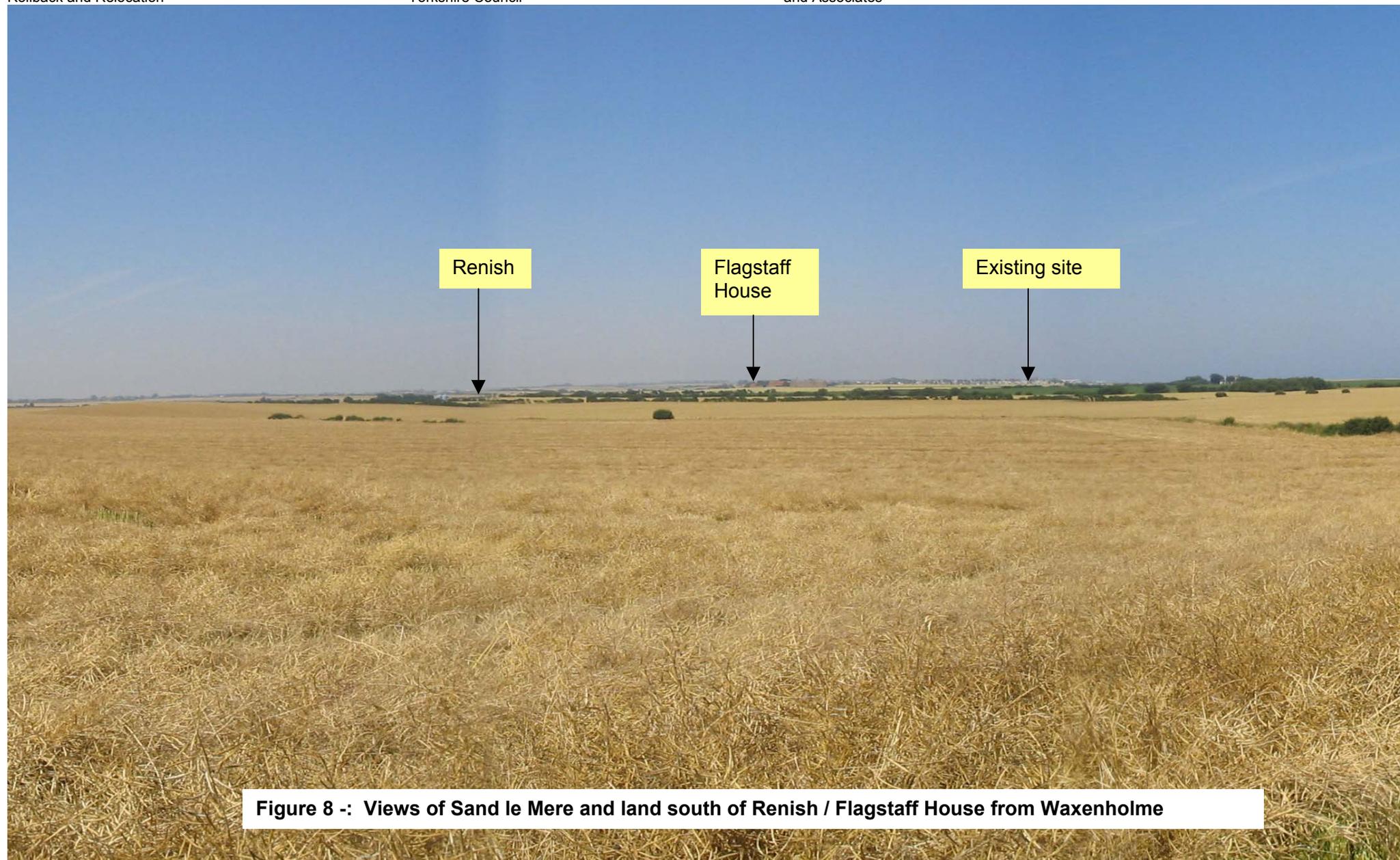
7.3.51 **Area Y** comprises the gently undulating open fields immediately to the west of Tunstall itself. Development here would be on higher ground, altering the character of approaches to the settlement significantly. To keep development in the lower areas, it would have to straddle Rostun Road. Larger belts of vegetation further south do help to shield this area when travelling on the B and minor roads from the Withernsea direction.

7.3.52 **Area Z** is land south of the Tunstall Drain, but on the north of the line between Mona House, Renish Farm, and Flagstaff House (Figure 7). These farms and buildings tend to be located on the higher points, but also have some substantial pockets of woodland, and could yield more than one potential site. The north-facing flanks would be highly visible from the B road, especially when turning the corner from Pilmar Lane into Withernsea Road. This area has potential, but would not be easy to screen with planting.



**Figure 7 -:
Area Z**

7.3.53 **Area W** comprises the south-facing flanks to the south of Renish and Flagstaff House (see Figure 8). When approaching from the Withernsea direction, particularly at Waxenholme, the current site is fairly prominent in the landscape. Although caravan site development in area W would be closer, there appears to be potential to keep it below the horizon, and to utilise and enhance current field boundaries and features to effectively screen new development.



Conclusions and Recommendations

- 7.3.54 There are a large number of factors and imponderables associated with this site as a case study which make it difficult to take conclusions and recommendations close to the implementation stage. It may prove to be one of the largest relocations to come forward, and that alone means that planning issues and cost implications dictate an element of caution. Decisions which fail to secure the best sustainable outcome for this site could leave a substantial mark on the area for many years to come.
- 7.3.55 Progressive rollback is not ruled out by the owner, but neither is it the favoured option. In our view, it does not raise the scope for securing the maximum sustainable development benefits, given the current position with respect to the quality, layout and appearance of the existing site. It also raises question marks regarding the adjacent agricultural units, especially the buildings for pig rearing.
- 7.3.56 In our view, there are areas in which an entirely new site could be located and achieve net sustainable benefits, notwithstanding possible landscape constraints. The Council may have to make difficult choices in this respect – deciding where the balance lies, particularly in relation to landscape and visual impacts. It is important to remember that the ICZM Plan policy aims will not be achieved unless new planning policies are developed and adopted which in turn enable businesses such as caravan sites at threat from erosion to survive. If a new site for relocation is rejected, the Council will have to be clear that this would be in line with new policy.
- 7.3.57 Whole site relocation also raises the possibility of vacating and restoring the existing site, with wider public benefits. Many of the issues discussed above could be integrated to provide an outcome where the benefits are greater than the sum of the parts. Public access, existing site landscape improvements, biodiversity and visitor information could be combined under a restoration and management strategy to achieve this. This may be the way in which the sustainable development balance could be shifted to yield an overall gain even if there are some drawbacks in landscape terms from a new site further inland.
- 7.3.58 An important factor in this, in our view, is integration with Environment Agency proposals for the Tunstall Drain. Even though there is currently no plan to retreat the drain defences, it is inevitable; and may be within 10 years. In terms of biodiversity, this is one of the very few opportunities for habitat creation by retreat along the East Riding coast. Relocation of the caravan site in areas X and Z would need to integrate even with such draft proposals as have already been examined. There is potential for a retreat scheme to be brought forward with mutual benefits and links appears to be substantial.
- 7.3.59 Our main recommendation for this case study is a simple one: that the site owner and advisers, the planning authority and the Environment Agency meet together at an early stage to discuss potential development sites and the related issues, in light of the policy approach recommended in this study. This would focus attention on the site areas with greatest potential benefits and fewest drawbacks in planning terms.
- 7.3.60 Site purchase possibilities would clearly further constrain opportunities for relocation, and discussion on the planning issues should, as far as possible, retain options, so as to avoid narrowing it down to one site, and thereby creating the potential for ransom. Such a situation could present substantial obstacles to implementation.
- 7.3.61 In terms of public financial assistance, the potential areas for directing funds are clear from Chapter 6. Enhancements to biodiversity, public access, visitor interpretation facilities and the removal of any coastal protection works are likely candidates.

7.3.62 Finally, if discussions indicate that options relatively close to the existing site appear to have insurmountable problems – for instance landscape impact or land purchase difficulties – an early indication of this could quickly and usefully divert attention to potential sites further away. Although this study has looked only at nearby areas of land (up to about 1.5km away), there is no particular reason why the net should not be cast further afield, say 3km as a next stage of search.

7.4 Case Study 3 : Sandy Beaches, Kilnsea

Existing Settlement Pattern and Landscape

- 7.4.1 This site is located within the exposed open landscape of the Humber Estuary. The Kilnsea settlement is strung out along the road from Kilnsea Grange, to Southfield Farm and the Bluebell Spurn Heritage Visitor Centre by the sea.
- 7.4.2 Approaching Kilnsea on the road from Easington to the north, the existing caravan site is not visible. Looking south-eastwards, the landscape is one of large, open fields, with sparse hedge boundaries and only a few trees. The Long Bank flood defence feature forms an even, almost unbroken horizon, except for the Northfield Farm ridge at the southern end. This contrasts with views looking northwards, which are dominated by Easington village and church, substantial trees, the gas terminal structures, and wind turbines beyond – all of which are outside of and to the north of the Spurn Heritage Coast.
- 7.4.3 After crossing Long Bank, the Kilnsea road runs south-eastwards close to the estuary side past the Riverside Hotel and a number of residential properties on the landward side. The road to the sea then turns eastwards by the Crown and Anchor pub, and initially is lined by substantial hedges, with some trees. There are farm buildings with locally characteristic herring-bone pattern cobbled walls on the south side, and some open views looking south towards Spurn Point and the raised bank and walkway along the estuary side. There is more development, including a small touring caravan site and the St Helens church, on the north side of the road.
- 7.4.4 Further along, the hedgerows become more erratic – dense in places, sparse in others. At this point the caravan site comes into view, with the tops of some units and the site buildings visible above the hedgerow which runs northwards along the access road. However, these views are seen together with other buildings such as the modern residential property and the Heritage Coast Visitor Centre.
- 7.4.5 Once past the access road, opposite the public car park, views into the caravan park are very open, and little screening is afforded by the very sparse, windswept hedgerow. Particularly visually intrusive are the site amenity building group, with its row of high, grey roof ridges; together with the smaller but equally out of keeping appearance of the white-washed former military buildings in the central and eastern parts of the site. Figure 9 shows the site from the beach access.
- 7.4.6 At the very local, fine-grained level, there are three distinct areas around the village. Firstly, there are the large, very open fields around Kilnsea Grange and up to the Northfield Farm ridge. Secondly, there is the development towards the middle of the village, together with the somewhat smaller fields to the north of the road as it turns from the estuary towards the coast. These features and the more substantial hedgerows and trees give this band a more enclosed, intimate feel.
- 7.4.7 The road from the pub to the caravan site provides a clear break in the landscape pattern and character of Kilnsea, dividing it from the third area, to the south. In that area, hedgerows quickly peter out, and the landscape is much more open again, with very broad views over the narrowing Spurn Peninsular (see figure 10), with the sea on one side and the estuary on the other. Some of the fields in that area owned and managed by the Yorkshire Wildlife Trust as part of the on going management of the Spurn National Nature Reserve.

Figure 9 - : The existing Sandy Beaches site



**Figure 10 - : The open
landscape of the
Spurn Peninsular**

7.4.8 The pub serves food and has 4 rooms for bed and breakfast. There is another bed and breakfast facility nearby, and this, along with another property in the village, provide licensed pitches for touring caravans. It is not known how many rooms the Riverside Hotel offers.

Heritage Coast Designation

7.4.9 There are a total of 45 heritage coasts in England and Wales. The Spurn Heritage Coast is one of only seven which is not within either a national park or an Area of Outstanding Natural Beauty. It occupies 18km of coast (there are 550km of Heritage Coast) and 16.5km² to mean low water.

7.4.10 The heritage coast designation itself is not a statutory one. However, some parts of this coast are recognised by statutory nature conservation designations, which goes some way to demonstrating why the area has been chosen –

- two Special Protection Areas
- Ramsar site
- cSAC
- SSSI and NNR

7.4.11 The area, particularly the spit itself, is also interesting in geomorphological terms, and its more recent history in this respect is closely bound up with man's activities in and uses for the peninsular. The social and cultural history (for instance the long history of the lifeboat station and the Listed military and maritime structures) of the area are inter-twined with its natural features. Artificial defences have, since the 19th Century, sought to maintain the position of the spit, which may otherwise have fluctuated and moved over time.

7.4.12 The area is designated because it possesses a rich blend of natural and cultural resources, and this gives it a unique character – it could be said that the whole is greater than the sum of the parts. Within this, the landscape character of the area is highly distinctive – and cannot be entirely separated from the other aspects of the Heritage Coast – but it is not the primary reason for the designation.

Management Strategy

7.4.13 The Heritage Coast designation and its important features are comprehensively set out in a Management Strategy. The first version was published in 1996, but is currently under review (Draft Management Strategy, October 2002). This document recognises the importance of the local planning policies in helping to ensure that development is compatible with the Heritage Coast designation, but also provides further guidance on what needs to be done to ensure that the area moves towards meeting its objectives, all in the context of the ICZM Plan. In seeking to further develop planning guidance, and in examining the Sandy Beaches site as a case study, the aims and the policies for action in the Heritage Coast Management Strategy (part reproduced in Appendix C) are central to success. The extent to which a rollback of the Sandy Beaches site might comply with the Management Strategy are discussed below.

7.4.14 In connection with tourism, the management strategy highlights visitor pressure as a cause for concern. A great deal of this pressure relates to visitors congregating at Spurn Head itself, where numbers can be very high in peak periods.

Current Planning Policy Background

7.4.15 In addition to the national and regional planning policies which apply to the coast and caravan sites throughout the East Riding coastal zone (see section 4 of this report), this site is subject to the following policies of the current Holderness Local Plan:

- Environment policies Env2, Env5, Env10, Env15, Env17, Env24, Env29, Env30
- Recreation policies R13, R15
- Tourism policies Tm1, Tm3, Tm4, Tm5, Tm6, Tm7.

Heritage coast policy Env10 is a restrictive policy, but one which does not rule out development, as long as it is compatible with the conservation of the coast, its heritage features, natural coastal processes or access (see Appendix B). The current Management Strategy aims are reflected in the local plan text.

The existing caravan site

7.4.16 The existing caravan site was originally a military establishment known as Fort Godwin. It served a number of purposes over the years from the First World War onwards. In the 1950's, military use ceased, and the site became a caravan park, utilising a number of the military buildings, some of which remain in use today. Remains of the very substantial concrete gun emplacements which were on the site can be seen on the beach at present, having been undermined by coastal erosion in recent years.

7.4.17 The roadway to the site is privately owned, being shared with Northfield Farm.

7.4.18 The site area is currently approximately 9ha (22 acres), reported to have been substantially reduced by coastal erosion over the years. Records indicate that the original site was greatly extended in the early 1970s. The present licence was granted in 1989 for 400 static caravans and 100 tourers (8 month occupancy), but at present there are only 160 private statics, and between 12 and 20 tourers on site. The site can no longer accommodate the full licence numbers, but the southern touring area is currently under-utilised. There is no site restriction preventing owners from renting units out themselves, though only one has chosen to do so. There is also an area for tents at the northern end of the site, though there have been some problems with the behaviour on this area, and it is relatively little used.

7.4.19 The site has been purchased from long-standing previous owners within the last year. The current owner describes this as a very quiet, low-key site, attracting a variety of clientele – for instance people who simply want the peace and quiet which such a remote location gives; birdwatchers; anglers. However, at the same time there are facilities on site which provide entertainment and services to cater for more activity.

7.4.20 In connection with this, the main facility is a large clubhouse. This has a popular bar at one end, which is also used for entertainment at a fairly low-key level. In the centre of the building is a substantial concert/function room with stage. This is regularly used for approximately six weeks in the summer, but more erratically at other times. The fish and chip shop and the amusements area at the other end of the building provide a service for visitors, but are not heavily patronized. A launderette is an important facility.

7.4.21 To the south of the clubhouse, a former military building (barracks) is still used for storage and keeping maintenance equipment. A similar building, no longer used by the site, is currently on the very edge of the cliff.

7.4.22 At the southern end of the site, the sub-surface sewerage treatment facility has an inspection house on the surface. A three stage treatment process is carried out before effluent is discharged via a pipe extending approximately 20 - 30m seawards from the cliff (Figure 11).



Figure 11 -: Water treatment outfall

7.4.23 Many caravan owners have been on the site for several years. It has a mixture of unit types of varying ages, no policy of periodic renewal, and so their condition could be described as variable. The site is not a member of any accreditation scheme.

7.4.24 At the northern end of the site there is a substantial area which is not occupied by vans. It tapers out towards the Beacon Lagoons nature reserve, managed by the South Holderness Countryside Society. The area has been largely left to nature conservation, and has not required active management to date. The area has developed significant biodiversity interest, and it perhaps represents an example of what might be achieved in similar cliff edge areas with a sympathetic approach to restoration of previously occupied land. The site has a David Bellamy nature conservation caravan site award.

7.4.25 Although not a recognised public right of way, an informal path along the coastal edge is used by site tenants and other members of the public. It appears to link up well with both the Lagoons to the north, and to the informal path which continues south towards Spurn.

- 7.4.26 The site is characterised by the whitewashed former military buildings and the larger, grey clubhouse (also of military origin). Together with the earth bund which has been built along the eastern edge, these tend to give the site a somewhat neglected, untidy appearance. The relic gun emplacements, which concrete blocks on the beach add to this appearance.
- 7.4.27 In addition to five of the owners family who work on the site (possibly 3 full time equivalents), Sandy Beaches also employs 1 other person full time, and a total of 8 jobs for approximately 8 months of the year – bar staff, security, catering, grounds maintenance etc. The owner reports that all servicing and building works are contracted locally.

Planning History

- 7.4.28 Planning permission was granted for the caravan use in the 1950's.
- 7.4.29 In 1999, an application was made by the previous owners for permission to relocate the caravan site on to 6.6ha of land immediately to the north of the road to the sea, between the existing site and the village. This would have abutted the church land and another adjoining property, and just over 100m from other homes to the west.
- 7.4.30 The submitted plans proposed the retention of hedgerow features, and would not have located pitches and other development on the higher ground towards Northfield Farm. As a consequence of that layout, approximately 50 to 60 pitches would have been located in the field immediately to the west of the existing site, and a further 100 in the next field closer to the main part of the village.
- 7.4.31 The application was supported by the Parish Council and 17 local residents. English Nature did not object. However, there were objections from other local residents, the Countryside Commission (now the Countryside Agency) and the South Holderness Countryside Society. Landscape and visual impacts and proximity to the village were prominent in these objections, along with concerns over nature conservation and potential policy conflicts with PPG20. There was also some concern that the proposals did not put forward a new clubhouse – the existing one being used by the village. The application was refused on grounds of incompatibility with the Heritage Coast designation.

Relationship to the Coast

- 7.4.32 Previous coastal defences along the frontage of the site began to fall into disrepair from the 1960s onwards, were undermined and eventually washed away. Erosion measurements for this part of the coast indicate that at the northern end of the site (post 114) the cliff edge is moving westwards at an average rate of 1.59m each year. Within and at the southern end of the site average erosion rates are higher, at 4.34m per year. Even these figures may hide some very localized variations, eg where erosion may be temporarily slowed where hard points remain – mostly parts of former military structures, eg the collapsed gun emplacements on the beach – which are believed to afford some protection from coastal erosion. At the same time, it is possible that there is an element of scour on the south side of the military building on the cliff edge, resulting in a slightly more rapid rate of erosion in line with the clubhouse. This means that this facility could be threatened sooner than other infrastructure, and at the same time as some of the pitches further north.
- 7.4.33 The whole of the site is within 200m of the cliff. However, the owner considers that reorganising the site layout and more efficient use of areas such as the touring part will enable current numbers to be maintained for several years, without detriment to the amenity of the occupiers.

- 7.4.34 Of more fundamental concern is the threat to infrastructure, especially the clubhouse, and later on the sewage treatment. Although there is scope to reduce the scale of the clubhouse, and not all of the current facilities it currently provides are essential to the operation of the site, some form of bar and entertainment building will need to be provided to replace that which would be lost.
- 7.4.35 The owner reports that residents of both Kilnsea and Easington are members of the club on the site and use the facilities.
- 7.4.36 The site owner has begun to consider both reorganising the site layout in the short term, and is looking into rollback and relocation possibilities for the longer term. He is also aware of the planning constraints that the Heritage Coast designation is likely to bring to bear; and of the failure of a planning application for relocation made by the previous site owners.
- 7.4.37 Nevertheless, the owner is positive towards exploring options which could bring overall sustainable development benefits. He considers that there is a good general relationship with local residents, who recognise the economic benefits of the site; and local businesses and the Wildlife Trust work well together. Although there was some local opposition to the previous application, he believes there might be potential to put together a more acceptable and better designed proposal, possibly linking with the heritage/wildlife organisations in a positive, integrated way.
- 7.4.38 The site owner considers that his clientele would not object greatly to a move of, say 400m back from the cliff edge, especially if the amenity and standard of the site improved; but that a more remote location away from the beach could undermine his business.

Constraints

- 7.4.39 The sensitivity of the Heritage Coast and the relatively limited area of land within it mean that acceptable locations for the rollback or relocation of this site are always likely to be restricted. The views of the owner and the *raison d'être* of the site – ie its special location close by the sea in this highly distinctive part of the East Riding Coast – reinforce the idea that to move it over a kilometre away would not enable it to maintain its customer base and the same contribution to the local economy.
- 7.4.40 Even given the significance of the Heritage Coast for nature conservation (in statutory terms perhaps its most important aspect), it appears that there are opportunities for rollback and relocation which would be acceptable. Some areas – for instance the existing nature reserves – would be inappropriate. However, much of the land in the northern part of the area is intensively farmed, with relatively low biodiversity interest at present.
- 7.4.41 The existing buildings and structures related to the military history of the site may need to be demolished. Whilst this is not seen as an obstacle to the principle of rollback, it would require consultation with bodies such as the Fortress Study Group and careful recording of features.
- 7.4.42 The relationship to the settlement and inhabitants of Kilnsea, and impacts on the landscape are likely to be more critical. As indicated at an earlier stage in the project, even in the Heritage Coast there is scope to achieve a great deal to incorporate development into the landscape, especially through careful screening. At the same time, areas where existing wide and open views would be interrupted in a way which would be discordant with the landscape character of the area; or where screening would be largely ineffective and

possibly equally discordant, both need to be avoided. This probably rules out land to the north of Kilnsea Grange. It also rules out land to the south of the road to the seaside carpark which, as described above, provides a division from the sensitive landscape of the headland, which is so important to the character of the Heritage Coast.

- 7.4.43 Also important is the high point around North Field Farm. Development of these slopes, which currently help to reduce the impact of the existing site, would be highly detrimental in terms of their visual and landscape impact.
- 7.4.44 When considering the appropriateness and likely effectiveness of screening, it has to be borne in mind that the current regular “enclosure hedges” are “quickthorne”, with slightly limited screening capabilities in the winter months. Many other types of vegetation would probably be out of character with the area.
- 7.4.45 There may also be opposition from local residents to rollback or relocation of the caravan site if it were to result in an imposing, overwhelming effect on the village. Kilnsea is a small settlement, and there is significant potential for it to be swamped by the caravan site and its occupants, especially in the summer months. At present the impact on the character of Kilnsea is limited due to its distance from many of the houses, and even if it were to move closer, some degree of separation would need to be maintained. The issue of proximity also has implications for the size of any rollback site and the number of pitches it might contain; and on the nature and extent of the site facilities.
- 7.4.46 Together, these constraints indicate that options for rollback should focus on the lower parts of the land between Kilnsea Grange and north of the road to the sea. Proposals here could benefit from the already more enclosed nature of the area and the presence of existing built development; but would also need to take into account the need to buffer against the village. These constraints also indicate that a substantial multiplier, whereby the number of pitches might be greatly increased, should be avoided.

Sustainable development benefits

- 7.4.47 One alternative to rollback would be to defend the coast at this point. This would be contrary to a raft of policies, specifically those in the SMP, the ICZM, the adopted Local Plan and the Heritage Coast Strategy, and would not be acceptable.
- 7.4.48 At the other end of the spectrum, another alternative might be to allow the caravan site to continue to shrink in size, with a new site not permitted because of environmental or other concerns. Such an approach runs the risk of overlooking the reality that it is not an entirely new development proposal we are considering in the Heritage Coast. The site may eventually close, but possibly only after a long period of time, and even then the requirements on the owners to restore the land are minimal. This would not be conducive to maintaining the current contribution of the site to the economy of the local area, could lead to further deterioration in the quality of tourist provision at the site in the meantime, and could increase its visual impact.
- 7.4.49 At this point it is worthwhile reminding ourselves that purpose of this project, arising from the ICZM, is to seek policies, guidance and practical suggestions to enable these types of business to deal with the effects of erosion without recourse to hard defences. Rollback or relocation of the existing site would have the general potential benefits of maintaining current economic activity which is progressively threatened by coastal erosion. Other possible benefits are set out below.

7.4.50 The potential for biodiversity and access enhancements is considerable, building on what has already been achieved at the northern end of the site. If a coastal strip is vacated, the land could be restored and managed for biodiversity, and provide a connecting area between the Lagoons Nature Reserve to the north, and the Trust managed areas to the south. Combined with improved access and possibly protective ownership and/or control, this would provide a public benefit in accordance with the Heritage Coast Strategy.

7.4.51 This could be linked with provision of new visitor, information and educational facilities. A more constant presence on the site might enable such facilities to be open and serve the general public for longer periods than the current Bluebell visitor centre can provide for. This could, to some extent, assist in diverting a small number of visitors away from the pressure area of the Spurn Head.

7.4.52 On a detailed point, the current sewerage facilities are threatened by erosion, and release effluent on to the beach at times of low tide. There would appear to be the potential to provide a better facility, possibly incorporating sustainable drainage systems such as biological treatment, to improve the discharges.

Policy Analysis

7.4.53 There would appear to be considerable scope for positively meeting the aims and achieving several of the policy actions in the Heritage Coast Management Strategy (revised draft), as follows:

- Rollback or relocation of Sandy Beaches has the potential to maintain the contribution of the site to the local economy and meet the needs of the local community and visiting public - these contributions would otherwise be lost gradually to coastal erosion (aims pages 10 and 16; policies 3.1, 3.2).
- If some of the hard development along the cliff frontage at the site can be removed, this would help to return this length of coast to natural coastal processes (aim page 10; policy 1.1).
- Imaginative and positive reinstatement of the existing site following rollback, combined with sensitive long term management, and possibly also ownership transfer to a protective body (aim page 13; policies 2.1, 2.2, 2.3, 2.4).

7.4.54 There may also be opportunities to integrate any rollback of the site with proposals for enhanced visitor facilities (policy 4.4) educational provisions (4.6); and there would be a need to ensure that opportunities for archaeological recording and enhancement to provisions for pollution control are grasped.

Costs and Phasing

7.4.55 The site clubhouse is a very important element of the business. Together with the sewage plant, it is likely to be threatened by erosion in the short – medium term (10 – 15 years), and so would probably need to be relocated at an early stage. This would require substantial capital investment, though a building considerably smaller than the present one would be adequate, and could be combined with a visitor facility (see below).

7.4.56 In terms of the pitches, the owner's preference is for a phased rollback of the site, rather than a whole site relocation over a short period. Maintaining some links to the current site is seen by the owner as desirable, with a phased movement of units to the new areas over

time so as not to dislocate and alienate present customers entirely, and in recognition that some of the units are older, and are unlikely to transfer successfully. Although no costings have been prepared, it is envisaged that a period of about 5 years to relocate all 160 pitches could enable the necessary finances to be raised and at the same time keep sufficient income from a combination of the existing tenants and new customers.

- 7.4.57 To date, relatively little work has been undertaken to assess the costs of some elements of rollback –especially for relocating infrastructure and for reinstatement. The owner is aware of the general likely costs of pitch formation and costs/difficulties associated with moving and/or replacing caravans. He is also aware that some of areas of land referred to below may be available for sale, but the current asking price may be unrealistic in terms of the balance sheet for a rollback / relocation proposal.

Potential Rollback Sites and Approaches

- 7.4.58 The preceding analysis indicates that the sensitivities and constraints of the area, whilst they do not rule out relocation or rollback, do limit options more than might be the case in many other areas of the East Riding Coast. It appears that Fields A – E (Figure 12) offer the best opportunities, and are commented on below. Throughout this, there is an emphasis on seeking to make any new site or extension visually unobtrusive, keeping to lower ground. At the same time, it needs to be borne in mind that this same lower ground will be at greater risk of flooding. The advice in PPG25 (paragraph 70 and Appendix G) describes how to approach this question. Another general point to bear in mind is that new planting can be difficult to establish in these particularly exposed, windy locations. Special attention may need to be given to techniques such as wind sheltering to protect new planting.
- 7.4.59 Field A (Figure 13) is an obvious choice, for rollback, being immediately to the rear of the existing site, away from the village and accessed via the current roadway. It should not be developed for pitches and other development on the higher ground, perhaps above the 5m contour – as per the previous application - and could therefore only accommodate a limited amount of development; 50 or 60 pitches, less if the clubhouse were to be relocated here. The height and condition of existing substantial hedges should be maintained and enhanced where possible.
- 7.4.60 Field B may also be suitable, but consideration needs to be given to retaining a significant part nearest to the church and village as a buffer, with additional screening provided. The part of the field immediately to the north of the church is understood to be in the ownership and control of a nature conservation body, and is therefore unlikely to be available in any case.
- 7.4.61 Further to the north, most of field C is on higher ground, and so is unlikely to be suitable, with the possible exception of the south west corner. The OS map 1:25000 sheet indicates a hedgerow separating fields C and D, but this was not seen on site, and may have been removed. Opportunity therefore exists to replace this or a similar landscape feature. Field D presents better site development opportunities, and could be less overbearing on the village than progressing to the western-most end of field B. Further screen planting and landscaping in D could mitigate any potential impacts due to a new development here; and indeed break up the current view of the caravan site eastwards across this field.



Figure 12 :: Option fields A – E

7.4.62 Fields E (Figure 14) and F also have some potential, and development here could be said to take the caravan site away from the more sensitive land leading south to Spurn Head. However, the fields are currently very open, and more remote from the sea. They could probably only be developed as a discrete new site, not as part of a progressive rollback maintaining links with the existing site for a period.

7.4.63 It is considered that effective screen planting and careful site layout / design should be able to incorporate caravan site development on these parts of these fields into the landscape satisfactorily.



Figure 13 -: Field A



Figure 14 -: Field E

Conclusions and next steps

7.4.64 There do not appear to be any objections in principle which would make a rollback unacceptable in terms of:

- national, regional and local planning policy framework for the Heritage Coast;
- the Heritage Coast Management Strategy.

7.4.65 Central to this conclusion is the need to recognise that:

- a) we do not start with a blank sheet of paper – there is already a caravan site, with an input to the local economy, but with a number of detrimental effects;
- b) there are opportunities for enhancements on a number of fronts which could be realised through a relocation or rollback, but might otherwise be lost; and
- c) the alternative is for the site to continue, but gradually diminish over a considerable period of time, possibly with progressively greater impact time on the area.

7.4.66 What is equally clear is that this sensitive area demands a carefully designed proposal in order to meet those policy demands. On a “balance sheet” of sustainable development pros and cons, a rollback would require provision of demonstrable net benefits to set against any potential harm to the Heritage Coast designation.

7.4.67 A progressive rollback is favoured. In the short term, development in an area such as field A could be made acceptable, allowing some of the existing site closest to the cliff to be cleared and restored. The remainder of the current site could continue to operate. It would also enable further land to the west, possibly parts of fields B, C and D, to be appropriately planted in advance, in preparation for further relocation of parts of the existing site over time.

7.4.68 The main difficulties in achieving this are likely to relate to the costs associated with land purchase and probable early infrastructure capital outlay, when set against a low pitch “multiplier”, relocation impacts on customer base and modest rates of return.

7.4.69 If this site is to be moved towards rollback, the owner needs to carefully assess the cost implications of moving the infrastructure outlined above; followed by a more detailed appraisal of how many pitches a sensitive design might enable to be accommodated in the potential fields.

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