

PARK HOMES & TOWN PLANNING

THEIR FUTURE CONTRIBUTION TO HOUSING



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SUMMARY

Park Homes play a valuable but generally unrecognized role in the wider housing market. Where they are acknowledged at all, they tend to be vilified or misrepresented; whether by design or simple ignorance.

There are nearly ¼ million people living in some 100,000 Park Homes on approximately 2,000 licensed Park Home Estates in Britain. Approximately 2,000 Park Homes are manufactured each year according to National Caravan Council statistics; mostly for replacement purposes rather than as additions to the overall stock.

Park Home Estates offer a secure, community-focused, environment that satisfies the needs of an increasingly large proportion of the UK population. In particular the semi-retired, retired and elderly.

There are multiple control measures, exercisable at local level, which ensure developmental and operational consistency and safety that are unmatched in traditional forms of housing development.

Legal tenure controls under the Mobile Homes Act 1983 ensure appropriate means of redress for both Park Home owner/occupier and the Park Home Estate operator.

Flexibility of design, consistency of construction, adaptability to energy saving measures and special needs, as well as their speed of siting and occupation is unmatched in the general housing market.

Moreover in comparison with that for bricks and mortar housing the 'cost' to the public purse from Park Homes is lower, yet the revenue stream contributed through Council Tax is at comparable levels; i.e. more for less.

They are poorly understood in the planning process and have been increasingly 'planned-out' of existence; despite being recognised as a valuable contributor to housing supply.

Without specific encouragement and support from Government – including guidance concerning their contribution to wider housing market provision - the legacy of past development control attitudes and policy constraints over Park Homes will continue to deny any further contribution from a very valuable element of the housing market.

To this end a draft supplementary planning guidance document is set out in the Annex to this statement as a starting point for Government and local authorities in their consideration of future policy within LDF's.

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1. WHAT IS A PARK HOME?

"Park Home" is now the industry name for a caravan¹ which is used for residential purposes. Although sometimes located singly (often as agricultural workers' dwellings on small holdings), the majority of Park Homes are located within a "caravan park", which may be solely devoted to residential purposes or sometimes mixed with holiday caravans. The development of bespoke 'Park Home Estates' has been a feature of the caravan industry over the last 30 years.

Park Homes are sophisticated manufactured dwellings akin to a bungalow, a world away from the traditional perception of residential caravans. They are designed and constructed to exacting standards under British Standard (BS3632).



Meeting modern environmental construction standards, new homes are typically double-glazed, centrally heated with intelligent management controls and insulated pitched tiled roofs. Solar assisted water heating, LED lighting as standard, green roofs aiding SUDS systems, water harvesters, bio-mass boilers, eco-showers and triple-glazing are all available features. A variety of external treatments can be applied to suit individual tastes and specific locations.

Although manufacturers offer a wide range of standard layouts, one of the biggest attractions for purchasers is the opportunity to 'design' their Park Home to suit their own requirements. Internally a Park Home can be arranged in almost limitless ways. Some of the larger homes can accommodate up to three (sometimes even four) bedrooms, two bathrooms (which may be en-suite), together with separate dining and lounge areas, study, utility room and even sauna's and wet rooms. Equally, homes can be designed for flexible disabled access.

Homes are generally provided complete with furniture and furnishings and fully fitted kitchens, including standard equipment. Here again the range and choice can be selected to suit the individual tastes of the purchaser.

The maximum overall size of a Park Home is limited to no more than 20m long by 6.8m wide (for a twin-unit) and no more than 3.05m from the floor to the ceiling at its highest level. A wide range of single and twin-unit homes are available from a variety of specialist Park Home manufacturers.

¹ Originally known as Residential Caravans and then Mobile Homes, Park Homes comply with the definition of a caravan in the Caravan Sites & Control of Development Act 1960, and the Caravan Sites Act 1968

2. THE PARK HOME MARKET

Park Homes have been providing alternative housing provision in the UK since the 2nd World War, but have gone largely unnoticed by authorities and Governments alike.

Park Homes are a unique type of tenure covered by specific legislation. Homes are normally owned by the occupier, who rents a 'pitch' from a 'park operator'. There are also a number of parks which offer Park Homes solely for rent.

There are nearly ¼ million people living in some 100,000 Park Homes on approximately 2,000 licensed Park Home Estates in Britain. Approximately 2,000 Park Homes are manufactured each year according to National Caravan Council statistics; mostly for replacement purposes, rather than as additions to the overall stock of Park Homes.

Government research in the early 1990's² established that:

- Households living in mobile homes were, on average much smaller than the British norm
- About a third of households were made up of a couple, one or both of whom were aged 60 or over; a further quarter were single people of 60 or over. About a fifth of households were childless couples aged under 60 and just over a tenth were single people aged under 60.
- Families with children were very much the exception. Only one household in ten included a child, and only about one household in twenty included more than one child
- As a consequence of the age structure, more than half of the people interviewed in the survey were fully retired
- There was a spread of incomes and savings, with a significant proportion of households, especially elderly ones, with low income levels
- About a third of mobile home residents were new households living together for the first time, or were continuing households who had previously been in shared accommodation of some sort. Half had previously owned a bricks and mortar home, often owning it outright. The remaining fifth of residents had previously rented a bricks and mortar home, usually from a private landlord
- Just over half the residents interviewed would stay in their mobile homes even if they had a chance to move to a bricks and mortar home
- Financial reasons were most important in choosing to live in a mobile home. Some respondents could afford to buy a mobile home when they could afford nothing else. Others - former owner/occupiers - could buy a mobile home and retain a capital sum for income supplement without the need for a mortgage.
- Retirement, ill-health and family change provided the spur for many to move from a bricks and mortar house too large or unsuitable for their needs and too big or expensive to keep clean and maintained.

Despite being 20 years old, the findings identified by this Research remain the same today.

² DOE Mobile Home Survey 1992

3. THE BENEFITS OF PARK HOME LIVING

These can be summed up as:

- a) Park Homes are well designed and compact, ideal for first-time buyers and more particularly attractive to the semi-retired, retired and the elderly
- b) Park Home Estates provide a secure, managed environment
- c) The homes provide good value for money and come fully furnished and equipped to individual taste
- d) Mortgage facilities are available
- e) They can appreciate in value akin to traditional property
- f) Park Homes can be designed and adapted to suit almost any personal choices and are readily adaptable for disabled occupation
- g) The environmental standards in new homes is very high, resulting in modest running costs, and sound sustainability credentials
- h) Maintenance costs are also generally much lower than bricks and mortar
- i) Homes are sold with 10 Year Gold Shield Warranty akin to NHBC cover
- j) Security of tenure is considerable, by virtue of the Mobile Homes Act 1983
- k) Park Home Estates are also controlled by virtue of their own park rules
- l) Town Planning, Site Licencing and Fire Safety regulations help ensure well regulated development and consistent day to day operation



4. TRIPLE CONTROL THROUGH PLANNING, SITE LICENCING & FIRE SAFETY

The Caravan Sites & Control of Development Act 1960 establishes a licensing requirement for caravan parks which runs in parallel with - but is separate from - the town planning process. You cannot lawfully operate a Park Home Estate without both a planning permission and a site licence.

In some respects the two means of control overlap, but the fundamental distinction is that planning deals with whether or not the use of land for the purpose of a caravan site is acceptable - having regard to material planning considerations - whilst the licensing system imposes a wide range of developmental and operation controls over the layout and format of the site and its day to day management and operation.

These licensing requirements are set out by the Secretary of State in Model Standards which "*.. represent those standards normally to be expected as a matter of good practice on caravan sites. They should be applied with due regard to the particular circumstances of the relevant site, including its physical character, any relevant services, facilities or other amenities that are available within or in the locality of the site and other applicable conditions*". These are guides which can be varied by the authority, depending upon individual circumstances, but cannot be varied away from the Model Standards to a point where they are considered 'unduly burdensome'.

The planning consent cannot fetter the implementation of licence conditions. Equally site licence conditions cannot be used to impose constraints upon or vary the planning permission.

Compliance with site licence conditions is mandatory and failure to comply with the condition of a site licence is an offence and liable to prosecution. Development that is required by the site licence has permitted development rights by virtue of Schedule 2 Part 5 Class B of the GPDO.

The various Model Standard conditions define everything from the required density, form of layout, spacing requirements, dimension of site roads etc through to fire safety, electrical wiring, gas compounds, litter etc. There are distinct standards for Park Home Estates³.

Therefore to operate a caravan park you need planning permission for the use of land as a caravan site and then a site licence issued by the Environmental Health Department, which establishes the form of the development within that permitted area.

The planning permission can limit the mode and period of use of the land, whilst the site licence will be issued commensurate with the most appropriate Model Standards for the particular type of caravan site consented.

Whereas the Council can enforce against any breach of planning control under the provisions of the Town & Country Planning Act 1990 (as amended), they can also take a Park Operator directly to Court for breach of Site Licence conditions. This dual means of control is very effective in delivering and maintaining appropriate standards and park operation for the benefit of park residents.

Changes to the Fire Safety Order 2005 now mean that Home Park Estates are further checked and controlled under these regulations.

³ The most recent Model Standards appropriate for residential caravans are "*Model Standards 2008 for Caravan Sites in England*" (April 2008)

5. THE SOCIAL AND ECONOMIC BENEFITS OF PARK HOME DEVELOPMENT

At a time when the traditional bricks and mortar housing sector remains in a parlous state as far as construction is concerned, there is a significant latent demand for new Park Home development that cannot be satisfied for want of new development pitches.

The vast majority of Existing Park Home Estates have done all they can to extract additional pitches from within their existing planning permissions, or as minor extensions. However this apparent increase in development activity has been countered and exceeded by the reduction in overall density on existing parks; due in no small part to growth in unit size from those original sited, and changes in Model Standard requirements. Therefore, as the sector upgrades and improves, its overall scale in terms of unit numbers reduces.

By virtue of the seriously constrained planning policy environment (see Section. 6), wholly new development is not occurring and therefore the price of existing Park Homes is forced up through scarcity and sustained demand. Whilst this may superficially appear beneficial to Park Operators, a proportion of their trading income is derived from new and replacement Park Homes and as Park Home Estates reach full development their business income begins to fall.

Being private estates, Park Home developments do not place as great a financial burden upon local authorities as traditional forms of housing. For example, internal site roads are not made up and adopted and service runs are installed and maintained by the site operator. Yet the same level of income is derived from Park Home residents through Council Tax payments as would be the case for the equivalent house.

From an environmental standpoint, being single story, they can often be absorbed into the wider urban environment in a discreet manner. They are also well suited to sites with development constraints for bricks and mortar property, as their ground loadings are lower and foundations much shallower, amounting to no more than a reinforced concrete pad.

Park Home estates are also leaders in environmental sustainability. David Bellamy and The Conservation Foundation pioneered a scheme⁴ in the 1990's in conjunction with the British Holiday & Home Parks Association (BHHPA) which awards those parks that have shown support and commitment to improving the environment and have encouraged further conservation initiatives. These awards are issued annually, thereby encouraging continued sustainability and improvement on an award park. This is a valuable selling feature for the park operator too.



From a social perspective Park Home estates are heavily weighted towards providing for the semi and fully retired. Park Homes appeal to those who seek a smaller and more easily managed property, adapted to their needs, at a lower relative purchase cost, that often allows release of capital tied up in bricks and mortar. It is a recognised feature that Park Home occupiers enjoy the 'community' environment created on parks and the added feeling of security afforded by on-site management. These facets also assist Park Home owners to live independently in their own homes far longer than would otherwise be the case, so that they do not become a burden on the State earlier than is absolutely necessary.

⁴ The David Bellamy Conservation Award Scheme

Creating Park Home pitches can therefore help to satisfy the aspirations of an ageing demographic profile, whilst also releasing existing property back into the wider housing market affording market churn.

Speed of development is also a critical feature. Combined With few significant ground works and relatively simple foundations these manufactured dwellings arrive on site in no more than two parts and fitted out. Once bolted together, the join weather sealed and services plugged in, they are ready to be occupied. From arrival on site to occupation can be a matter of a day or so rather than many months for traditional property.

A 10 Year Gold Shield Warranty Scheme on the homes and their foundations is akin to the NHBC Ten Year Warranty on bricks and mortar dwellings.



From a wider economic standpoint, it must also be appreciated that this housing sector also sustains Britain's manufacturing industry. There are 10 principle manufacturers of Park Homes in Britain, and a plethora of smaller companies that supply them. These businesses are wholly dependent upon the availability of Park Home pitches and/or a turnover in existing units. Most of these businesses are increasingly relying upon diversification into other market sectors because of the scarcity of demand for new Park Home units arising not only out of pitch scarcity, but also the increasing longevity of the units that are being manufactured.

Key Points

- There is a latent, unmet demand
- Appeal to key areas of the housing market demographic
- Sound developmental and legal controls provide security and safety
- Lower maintenance and cost of living
- Community environment
- Speed of development is rapid
- Supports important manufacturing jobs
- Sound sustainability credentials
- Park Home Estates are businesses that also employ people and derive support services and goods

6. PARK HOMES & THE PLANNING POLICY DILEMMA

Current planning policy guidance concerning housing development makes no specific provision for Park Homes. Whereas, at one time, Park Homes were assessed differently from bricks and mortar property, they are now required to fulfill the same planning criteria as any other type of housing. As a result, new Park Home development has effectively been planned-out of existence.

If a site is suitable for housing then – predictably – more valuable traditional housebuilding is the end result. Even where Park Home development is proposed for a site (all other things being equal) it is not uncommon to see local authorities objecting on design, streetscape and a plethora of environmental issues; in fact, anything to cause Park Home development not to happen.

Here are some policy examples:

"Proposals for the development of residential caravan sites should be treated in the same manner as permanent residential development and be subject to the same policies, except where visual appearance would make a site unacceptable".

Typical wording that can be seen in many Development Plans (and guess what their view is on visual appearance).

"Residential caravans and mobile homes require similar services to permanent housing and are, therefore, subject to the same considerations. However, owing to their design, form and materials, mobile homes will not necessarily be appropriate on land where housing development is acceptable".

Salisbury Local Plan

Therefore, if you can only develop for housing on land suitable for housing development, and mobile homes are not visually acceptable in principle and not necessarily appropriate for development on land suitable for housing, then no mobile home development will ever be allowed.

The general site specific criteria applicable to the location of new residential development is often applicable to proposals for residential mobile homes, although such proposals are normally temporary in nature and out of place in the middle of ordinary housing.

West Oxfordshire District Council Local Plan

"Many existing residential mobile homes provide a valuable source of affordable housing which should not be diminished by their replacement with permanent dwellings. However, in general, new residential caravan sites and mobile homes would not be in keeping with the environment of the District. Their form and appearance are incompatible with the character of rural areas, especially the countryside of the High Weald, and they constitute inappropriate, sporadic and unsustainable development. New development for this purpose will thus usually be unacceptable unless it would significantly improve the appearance of an existing mobile home site and would otherwise accord with Plan policies including Policy GD1. The Plan seeks to ensure that housing needs are met by the construction of permanent dwellings".

Rother District Council Local Plan

The 'Rother' stance effectively takes the cake and eats it. The Plan acknowledges how useful Park Homes are in meeting housing need, but then says they're inappropriate and unsustainable and, by the way, only bricks and mortar will do.

There is also a common confusion with provision for Gypsies and persons of nomadic habit where - up to now - separate legislation and policy considerations have applied. They are now often treated in the same breath.

Notwithstanding the requirement to fulfill the needs of all sectors of the housing market, Park Homes are rarely if ever given consideration in housing needs surveys; yet local authorities are quite content to regularly use their existing Park Home numbers to reduce housing land supply requirements.

It is essential therefore that the Government lends support and guidance to this particular housing market sector in the same way that it does for other types of dwelling: such as houseboats⁵ and self-builders⁶.

Without specific encouragement and support from Government – including guidance concerning their contribution to wider housing market provision - the legacy of past development control attitudes and policy constraints over Park Homes will continue to deny any further contribution from a very valuable element of the housing market.

To this end a draft supplementary planning guidance document is set out in the Annex A to this statement as a starting point for Government and local authorities in their consideration of future policy within LDF's.

⁵ Grant Shapps MP statement, " ... houseboats could allow people to live in areas that otherwise might be out of their financial reach". "Around 15,000 people live on our waterways and many more would like to do so. The government's commitment to localism could be an opportunity for living on boats to be given a new lease of life." August 2011

⁶ Grant Shapps has today welcomed a new action plan for the self build industry that he says could be the turning point that takes it to the masses [<http://www.communities.gov.uk/news/corporate/1949749>]

DRAFT SUPPLEMENTARY PLANNING GUIDANCE FOR PARK HOME DEVELOPMENT

- 1 The Government believes that it is important to help create mixed and inclusive communities, which offer a choice of housing and lifestyle. It does not accept that different types of housing or tenure make bad neighbours. Moreover, it is important to encourage a better social mix and avoid the creation of large areas of housing of similar characteristics. Park Homes are a longstanding, important and distinct element of the housing market that should not be overlooked, or denied planning permission by virtue of their particular appearance and land use requirements.
- 2 "Park Home" is the Caravan Industry name for a caravan⁷ which is used for residential purposes. Although sometimes located singly (often as agricultural workers' dwellings on small holdings), the majority of Park Homes are located within a "caravan park", which may be solely devoted to residential purposes or sometimes mixed with holiday caravans.
- 3 These 'Park Home Estates' are privately owned and run housing developments that are subject to a variety of legislative controls. There are nearly ¼ million people living in some 100,000 Park Homes on approximately 2,000 licensed Park Home Estates in Britain.
- 4 For the avoidance of doubt, the Government considers Park Homes to be a sustainable form of development that fulfills a valuable role within the housing market and should therefore be given equal weight in planning considerations as for any other form of housing development.
- 5 Whilst there may be limited instances in which Park Homes could be considered out of place (perhaps in some Conservation Areas or a World Heritage site) there should be no prima face objection to their development based solely upon design, physical appearance or distinct form of layout. They are a type of manufactured housing with discrete requirements that must be allowed for in the same manner as discrete provision are made for houseboats and sites for travellers.

As a result of historic planning legislation⁸ many Park Home Estates are located in the countryside beyond defined settlement boundaries. Whilst it is not the Government's intention to encourage sporadic residential development in the countryside, Local authorities should consider whether, in addressing Park Home demand, this can be met through extensions to existing developments as well as wholly new developments. The needs of the rural community for a diverse range of housing provision should not be overlooked.

- 6 Although suitable for the young, individuals, couples or even families, they have become particularly attractive to the retired and elderly who tend to 'down-size' from bricks and mortar; both to realize capital to support their pensions, but also for the additional flexibility, security and community environment offered within Park Home Estates. Such 'churn' brought about in the housing market is valuable in helping to redistribute dwellings to those elsewhere on the housing ladder, and helps support people in their own home for longer than might otherwise be the case.

⁷ Originally known as Residential Caravans and then Mobile Homes, Park Homes comply with the definition of a caravan in the Caravan Sites & Control of Development Act 1960, and the Caravan Sites Act 1968

⁸ Development Control Policy Note 8: Caravan Sites

- 7 Unlike bricks and mortar schemes, Park Home development and park operation is controlled directly through both the Town Planning and Environmental Health legislation; added to which are provisions under the Fire Safety Order 2005. The planning system should normally identify and determines the use of land, access and certain landscaping issues, whilst the final form of development and operational requirements are subject to the various Model Standards⁹ issued from time to time by the Secretary of State and as set out in a Site Licence.
- 8 Following the grant of planning permission it is incumbent upon the local authority to issue an appropriate Site Licence¹⁰. It will be important therefore for the planning department to consult with and be aware of the up to date Model Standards in their consideration of any development proposals. The Model Standards are those normally to be expected as a matter of good practice and cover a wide variety of development aspects that might usually be the province of planning conditions. It will not be necessary or appropriate for the planning permission to recite or replicate these Standards.
- 9 Modern Park Homes are visually similar to bungalows and can be provided with a variety of external finishes. In order to better integrate Park Home development with other forms of housing nearby and to reduce any visual impact on its surroundings, planning conditions may be appropriate that control certain aspects of Park Home development. These may extend to landscaping and boundary screening, developing a limited palette of colours for external elevations¹¹ and roofs and ensuring that access onto the public highway is satisfactory. However, internal site layout and design should accord with Model Standard requirements.
- 10 As a result of their particular form of structure and land use, Park Homes do not benefit from the same domestic permitted development rights as bricks and mortar property. It will be important to ensure that this is clear on the face of any decision notice so that occupiers and operators alike are made aware of this fact¹². Where garages and outbuildings are proposed their type and location should have due regard to the relevant Model Standards concerning fire safety.
- 11 Decking areas are also an increasingly common feature around Park Homes. Whilst planning permission is required, local authorities should consult with the Park Operator and Environmental Health department to ensure any proposal properly meets Site Licence fire safety requirements.
- 12 Building Regulations do not apply to caravans, but may apply to certain elements of caravan park development which are not covered by the provisions of a Site Licence.

⁹ Model Standards 2008 for Caravan Sites in England (April 2008)

¹⁰ Section 3 (4) Caravan Sites & Control of Development Act 1960

¹¹ See BS:6770 1988 'Guide for External Colours for Park Homes, Holiday Caravans and Transportable Accommodation Units'

¹² Requirements specified in a Site Licence do have permitted development rights under Part 5 Class B of the GPDO 1995.

About the Author:

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Ian is a Chartered Planning & Development Surveyor and Chartered Town Planner who has worked in private practice for over 30 years. He has been a specialist advisor to the Caravan Industry throughout his professional career and continues to advise the industry today.

Involved in all aspects of town planning consultancy for both private and public sector clients, Ian is one of a handful of consultants with recognised expertise in matters relating to the planning for and site licencing of caravan sites. Over the years he has acted for all the corporate park operators and hundreds of other private operators on planning and site licencing issues.

Ian has written articles, lectured and addressed conferences on a range of caravan, planning, tourism, leisure and development topics. During the 1990's he produced a detailed report on the Economic Value of Holiday Caravan Parks¹³ which was an important contributor to the consideration of development plan policy for local authorities across the country. Ian was also a co-author of a widely circulated publication for the Countryside Commission¹⁴ which is now highlighted in the Government's 'Good Practice Guide on Planning for Tourism' (2006).

In 2009 he was commissioned by the Royal Institution of Chartered Surveyors to write a book on the Town Planning System. *The New Planning System – Questions and Answers* RICS Books June 2009
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¹³ "Do You Value Your Holiday Caravan Parks?" (updated 1997)

¹⁴ "Holiday Caravan Parks: Caring for the Environment – A Guide to Good Practice (1990)