



Park Homes in Scotland: Planning for Retirement Living

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1.1 Introduction

Newcastle University was commissioned by the Morris Leslie Group to explore the potential of Park Homes for retirement living in Scotland, with a particular focus on the planning system. Whilst there has been some research completed on the experiences of Park Home owners, there is a dearth of work investigating the planning aspects of Park Home development. Research on Park Homes provides an opportunity to explore a broader range of quality options that answers two of the big questions of our time: how do we deliver more homes more quickly?; and how do we respond imaginatively to the needs of an ageing population?

1.2 Research Questions

- How do planning officers in Scotland consider Park Homes?
- What are the experiences of Park Home developers of the planning system?
- Where are the opportunities for reform in relation to Park Homes and planning?

1.3 Methods

The study involved:

- A workshop with people in later life to capture their views and questions on Park Homes
- Analysis of a small dataset on park locations and facilities in Scotland
- Analysis of specific policies on Park Home development across the 34 planning authorities
- Interviews and focus groups with planning officers, manufacturers, park operators, occupational therapists, residents and other relevant professionals
- Case study analysis of applications for Certificates of Lawful Use and Development and planning permission relating to Park Homes

1.4 Key Findings

1. There are a number of potential advantages to Park Home living in retirement. These include: the potential for equity release; access to accommodation which may otherwise be unaffordable due to location and design; reduced maintenance; bespoke designs; access to outside space; a safe, scenic and peaceful environment; and access to a community of a similar age.
2. There may also be advantages to local authorities of Park Home developments including: the relatively quick delivery of accommodation; providing downsizing options to older residents; providing greater accessibility benefits; and the indirect impact of freeing up larger homes to which other people can relocate. They also have the potential to meet the policy goal of increasing the range of homes available in Scotland.
3. Very little research has been completed on Park Homes in the past. There is a critical lack of research exploring Park Homes in relation to: planning; impacts on health and wellbeing, quality of life and service use; accessibility and adaptability; energy efficiency; people who leave parks; and identifying circumstances where they would be more appropriate than traditional housing.
4. The number of parks and Park Homes varies dramatically across Scotland. The little data available suggests Perth and Kinross, Argyll and Bute and Dumfries and Galloway have a relatively large number of parks and Midlothian, Moray and Perth and Kinross have a relatively large number of Park Homes.
5. There is no perfect retirement option and there are potential disadvantages to Park Home living. However, some perceived disadvantages, such as a lack of adaptability and poor energy efficiency, may be

more applicable to much older models rather than new Park Homes. Others, such as concerns over needing to replace the Park Home periodically, are based on misunderstandings.

6. The market for Park Homes may have been slower to develop in Scotland than in other parts of the UK but there are reports of increasing demand in some areas and a perception that there may be greater untapped potential for the future here than elsewhere.
 7. The majority of planning authorities in Scotland do not have a specific policy which relates to future general Park Home development. The significant minority which do have such a policy are all unsupportive. The reasons cited include the local climate, Park Home construction/design, and their visual impact. Of the 11 planning authorities with proposed plans available, just one had a (potentially) supportive policy toward Park Homes.
 8. There are broadly five ways that land can lawfully have Park Homes sited upon it in planning terms. These include historical planning permission and continuous use for 10 years or more, which are both recognised through issue of a Certificate for Lawful Use or Development. This is a legal test and does not involve accordance with planning policies. Land may also see Park Home development because of changes of use from holiday caravanning, expansion of existing parks or, hypothetically, completely new development. These developments would require planning permission.
 9. Planning issues raised by officers in relation to Park Home development include: their construction, energy efficiency, performance in harsh climates, and adaptability; sustainable locations and access to services; their appearance; park layout; park management; and the resident mix. However, these perceptions may be explained by a lack of awareness among some planning officers as to the nature of Park Homes, especially new models, with knowledge and experience sometimes found to be based on vague perceptions and older parks and units.
 10. Inconsistencies in how to treat Park Home developments from a planning perspective were identified. There appears to be confusion over whether Park Home development proposals should be treated as caravans or a Class 9 dwelling use. This often differed based on whether applications are for converting a holiday site, expansion of an existing residential park or completely new development. There may also be confusion as to the respective roles of planning and licensing and their relationship in Park Home developments as well as in relation to developer contributions and affordable housing provision.
- 1.5 Recommendations
1. The Scottish Government should commit to producing national planning policy on retirement accommodation which details how future needs can be met and includes consideration of the potential of Park Homes.
 2. Planning authorities should be open to the possibility of Park Home developments in meeting the needs of an ageing population. Prohibitive policies, potentially based on vague and dated perceptions of Park Homes, should be reconsidered to allow development proposals to be considered on their own merits.
 3. The Scottish Government and the Royal Town Planning Institute (RTPI) Scotland should provide planning officers with information on the nature of Park Homes and guidance on how developments should

be considered. A planning delivery advice note should be provided after extensive consultation with all stakeholders, including the RTPI Scotland and the BH&HPA. This advice should include the following (see Appendix 2 for further details):

- a. Background information on relevant legislation, the construction and appearance of new Park Homes and the potential advantages of this retirement option.
 - b. Clarity that Park Homes are legally residential caravans and should be considered as such in planning terms, rather than a Class 9 housing use, and do not have permitted development rights. Park Homes should be treated as residential caravans regardless of whether planning applications are for conversions from holiday sites, expansions of existing residential parks or entirely new developments. This would be consistent with the fact that Park Homes are not legally houses.
 - c. Guidance on the locations which would be more appropriate for Park Home development. Park Home developments would generally take place on land suitable for residential development but would not have to fulfil all residential/housing policies of planning authorities. Redevelopment of sites for housing would require a planning application. This would ordinarily be on land designated for residential development. However, Park Home development might also take place on land not designated for residential use in limited circumstances where there is demonstrable proximity to everyday life amenities.
 - d. Implications of considering Park Homes as a retirement option for density, open space, landscaping and traffic generation issues.
 - e. As an affordable option for people in or nearing retirement, the appropriateness of developer contributions for affordable housing and education should be detailed.
 - f. The relationship between planning and licensing in Park Home developments and their respective responsibilities.
4. The Scottish Government should monitor the impact of increased funding of planning authorities through higher planning fees introduced in 2017. Achieving the policy goal of a greater range of types of homes will require openness to innovative new forms of accommodation to meet growing demand from an ageing population. This necessitates sufficient resources to explore, learn and understand the potential of niche options, such as Park Homes.
 5. The Scottish Government should monitor the impact of the new licensing system introduced in 2017 and its success in preventing poor management practices on parks. New regulations should be considered if some parks continue to be managed poorly.
 6. The Royal College of Occupational Therapists in Scotland should work with Park Home manufacturers to understand the potential adaptability of units. The Scottish Government should allow Park Home residents to access home adaptation grants available to people living in mainstream housing, as is the case in England and Wales. The government should also review eligibility for other grants and benefits for Park Home residents.
 7. Further research should be conducted to provide a fuller understanding of the potential of Park Home developments in meeting needs in later life, including:
 - a. evaluations of impact on new resident health and wellbeing and service use

- b. adaptability and future-proofing
- c. in-situ energy performance
- d. the investment potential of Park Home purchases
- e. Park Home leavers and their destinations
- f. circumstances where Park Homes may be more appropriate than traditional dwellings
- g. exploration of prohibiting park operator re-purchase of homes and its potential impacts on management behaviour and future investment
- h. the impact of the new licensing system on Park Home management practices and how local authorities enact their new interim management powers

The findings of such research should be disseminated widely to counter outdated perceptions.



Image taken in Deanland Wood Park in Hailsham, West Sussex, provided by BH&HPA

The Office for National Statistics has recently estimated that in June 2017 18.2 per cent of the UK population was aged 65 and over (ONS, 2018). The Scottish population has a slightly larger share of people aged 65 and over than the UK generally (18.7 per cent) (NRS, 2018). Of Scotland's 2,483,102 households, 34 per cent are headed by a person aged 60 or older (NRS, 2016). It is predicted that the median age in Scotland is set to be 45.2 years by 2039, in contrast to 42.9 years for the UK as a whole (SSAC, 2018). Lower fertility and increases in life expectancy in recent decades are contributing to this growth.

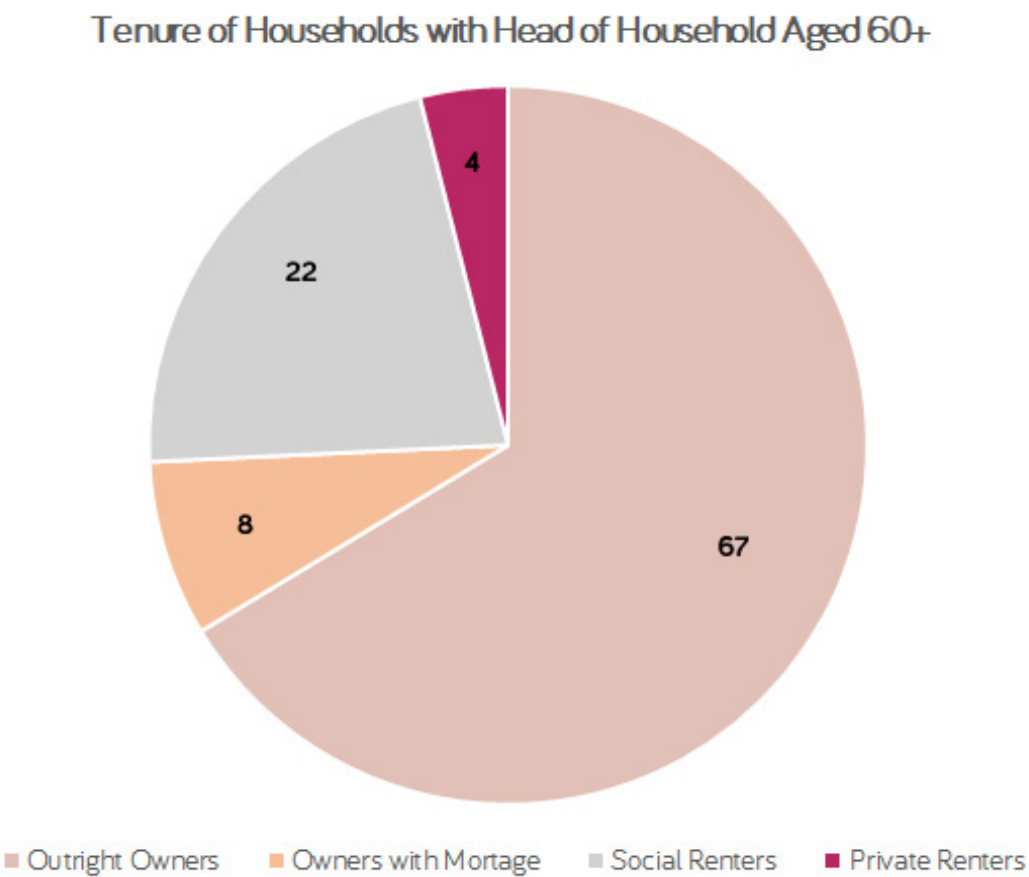
Whilst increases in life expectancy are to be celebrated, the social and economic consequences of this phenomena need to be carefully considered. Ensuring sufficient affordable housing options is critical. Previous research completed for the Scottish Government has argued:

Work is needed to explore the barriers to delivery and potential incentives for encouraging the development of housing and support for older adults that fulfil the desire for lifetime homes in neighbourhoods of choice.
(Mullan and Woolrych, 2016)

Home environments can make a critical contribution to positive health and wellbeing outcomes. Repeated tranches of research suggest that our relationship with our home becomes more critical as we grow older with poor quality housing creating health concerns and adding to the costs of the NHS (Garrett and Burris, 2015). Nicol et al. (2015) have estimated that the cost of poor housing to the NHS in the UK totals £2.5bn. For others it is the lack of fit with their family size or changing physical needs. As Helen Hayes MP (2018, p.IX) asserts “housing must be at the centre of our collective conversation about ageing”.

Too many people move home in a crisis situation with no time to give to the fit of the new dwelling with their lifestyle choices as well as to their physical needs. It is clear that giving time to consider the options promotes better outcomes. However determining what is available is not easy. The Elderly Accommodation Counsel (EAC) suggests that there are 1,940 retirement properties mainly in grouped accommodation settings in Scotland embracing cottages, bungalows, apartments and all with varying levels of support, from the care packages offered by extra care through to linked alarm systems (EAC, 2018). The majority of accommodation targeted at older people is for rental which is out of step with older people who are largely home owners, though not necessarily rich in equity (Figure 2.1).

Figure 2.1



Source: NRS, 2016

Extrapolating the survey results of Claudia Wood's work (2013) to Scotland's 565,650 older outright home owners suggests that 58 per cent of older home owners would consider moving (a total of 328,077 households) and 25 per cent would consider a retirement property (141,412 households) suggesting a large unmet need. Indeed, Savills (2016) have identified limited supply in retirement accommodation in Scotland and argue that there is untapped potential in this sector. As in England there is limited guidance at the central government level that considers the role of housing in maintaining independent living nor any clear direction for planners on land allocations for retirement living. The potential advantages of expanding options for people in later life are not limited to the people who relocate, however. The prospect of new housing development freeing up family housing has been discussed for some time (Wood, 2013; Wood and Vibert 2017).

Park Homes are a form of accommodation which are especially popular with people in later life (Riseborough, 2014). They are legally considered caravans and are constructed in factories before being transported to parks where they are sited upon concrete bases. Their wheeled chassis is often hidden by brickwork and modern Park Homes are generally more similar in appearance to bungalows. Many parks are marketed as retirement accommodation, restricting occupation to people over a certain age.

Newcastle University was commissioned by the Morris Leslie Group to explore the potential for Park Homes as an option for retirement living in Scotland, with a particular focus on the planning system. Whilst there has been some research completed on the experiences of Park Home owners, there is a dearth of work investigating the planning aspects of Park Home development. This report presents the findings of the research, drawing upon interviews and focus groups with relevant professionals, analysis of planning policies and examples of previous development.



Image provided by Richmond Lodge and Park Homes

3.1 Introduction

This section briefly sets out the background and context to Park Homes. It begins with a fuller explanation of what Park Homes are and how they differ from other forms of accommodation. The second subsection details the key pieces of legislation which are relevant to Park Homes in Scotland. The final subsection provides a brief review of relevant research on Park Homes in the recent past.

3.2 What is a Park Home?

Park Homes are also known as residential mobile homes and residential caravans. In construction they are essentially timber framed bungalows with a wheeled chassis which is often hidden. They are constructed in factories and transported to parks, often in two sections which are joined together. Park Home residents have an agreement with a park owner which sets out their respective rights and responsibilities. Residents pay a pitch fee to the park owner and on many sites may also purchase their supply of electricity, water and gas through them. Whilst Park Homes are technically mobile, they are very rarely relocated to other parks. Park owners can only re-site Park Homes on their land in exceptional circumstances. Park Homes are not constructed to building standards but are instead built to the British Standard BS 3632, the most recent version of which was published in 2015.

Park Homes differ from holiday caravans in several key ways. Holiday caravans are not intended for year round occupation and are built to the lower standard BS EN 1647. Secondly, all caravan sites must be licensed and the licensing differs between residential parks and holiday parks. Holiday park licenses might mandate that parks close for a period of the year or, more commonly, that residents do not occupy the caravans for longer than a certain length of time. There is evidence that some people live in holiday caravans as their main residence (Bevan, 2007). However, this affords them little security of tenure and no official permanent address, potentially making it difficult to access various services (Riseborough, 2014). Thirdly, residential parks often have fewer facilities than holiday parks.

3.3 Legislation

There are five key pieces of legislation which are relevant to Park Homes in Scotland and these are briefly considered in turn below.

3.3.1 Caravan Sites and Control of Development Act 1960

This is the fundamental piece of legislation relating to caravans in Scotland and the rest of the UK. The following definition of caravans is provided in the Act:

“caravan” means any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer) and any motor vehicle so designed or adapted, but does not include –

- (a) Any railway rolling stock which is for the time being on rails forming part of a railway system, or*
- (b) Any tent;*

(Caravan Sites and Control of Development Act 1960)

It sets out requirements for licenses for the use of land as a caravan site and covers holiday, residential and gypsy and traveller sites (Scottish Government, 2017a). It sets out how local authorities, which issue licenses, can impose conditions relating to density, spacing and amenities and the Secretary of State was provided with a power to specify ‘Model Standards’ in this regard. The Act has been amended in important ways but remains a key piece of legislation (Scottish Government, 2017a).

3.3.2 Caravan Sites Act 1968

In this Act the definition of a caravan was amended slightly to include twin-unit caravans:

A structure designed or adapted for human habitation which –

- (a) Is composed of not more than two sections separately constructed and designed to be assembled on a site by means of bolts, clamps or other devices; and*
- (b) Is, when assembled, physically capable of being moved by road from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer),*

shall not be treated as not being (or as not having been) a caravan within the meaning of Part I of the Caravan Sites and Control of Development Act 1960 by reason only that it cannot lawfully be so moved on a highway when assembled.

(Caravan Sites Act 1968)

However, the legislation set upper size limits for this definition: a length of 60 feet by a width of 20 feet and a height of 10 feet¹. The Act primarily sought to protect mobile home occupiers who live on what were termed ‘protected sites’, defined as “land for which the owner has planning permission and is entitled to obtain a site licence” (Wilson, 2017, p5). The Act limits the process by which occupiers with residential contracts can be evicted, mandating the acquisition of a court order (Scottish Government, 2017a).

3.3.3 Mobile Homes Act 1983

This legislation again sought protections for residents of Park Homes, providing them with security of tenure on protected sites where they reside and pay pitch fees. One of the most important features of this Act was the introduction of the requirement for the park owner to set out the express and implied terms of their agreement with occupiers in a ‘written statement’ (Wilson, 2017). The implied terms cover the minimum rights and obligations of Park Home residents, covering the duration of the agreement, how it can be terminated by each party, recovery of overpayments, gifting and sale of the home – “to a person approved of by the owner” (Mobiles Homes Act 1983) – and re-siting of the mobile home. The express terms are specific to the park and usually cover obligations around maintenance of the home and park for the occupier and park owner, respectively. The Act also set out the entitlement of the park owner to receive a commission on the sale of homes on their park (Scottish Government, 2017a). This is capped by the Secretary of State and was set at 10 per cent by the Mobile Homes (Commissions) Order 1983.

3.3.4 Mobile Homes Act 1983 (Amendment of Schedule 1) (Scotland) Order 2013

This legislation made significant amendments to the implied terms of residential agreements in Scotland. These included: the removal of the requirement for a Park Home owner who is selling to seek approval of their purchaser by the site owner; the need for the seller to provide the buyer with the park rules; the entitlement for occupiers to market their homes for sale via an agent and advertise this on signs in or on the home; the specification that re-siting of homes can only occur at the satisfaction of a court or for essential repair or emergency works; and the entitlement of the occupier to “undisturbed possession of the mobile home together with the pitch during the continuance of the agreement.” (Mobile Homes Act 1983 (Amendment of Schedule 1) (Scotland) Order 2013). The Mobile Homes (Written Statement) Scotland Regulations 2013 set out the new version of the written statement.

3.3.5 Housing (Scotland) Act 2014

Part 5 of this Act set out a new licensing system for residential (and mixed) parks in Scotland, with more details following in the Licensing of Relevant Permanent Sites (Scotland) Regulations 2016 (Scottish Government, 2017a). The new system provided local authorities with new powers in granting, managing and revoking licenses. This included the introduction of a ‘fit and proper person’ test and a new five-year license period. If a site license is revoked the local authority can appoint an ‘interim manager’. The new system came into force on 1 May 2017 and existing parks have until 1 May 2019 to apply for a new license. It is therefore too early to know the impact of these reforms.

¹ The upper size limits differ in England.

3.4 Literature Review

There has been very little research completed on Park Homes in the UK, with only a handful of studies published in the last 20 years. This subsection explores the little work completed in the past and highlights the gaps which remain. It is organised around six themes: attractions of relocating to a Park Home; life on the park; adaptability; fuel poverty and energy efficiency; leaving Park Homes; and Park Homes and planning.

3.4.1 Attractions of Relocating to a Park Home

Some previous research has explored the reasons why people are attracted to relocate to Park Homes, including the work of Mark Bevan in both England (2009, 2010, 2011) and Scotland (2007). He has previously conceptualised two groups of Park Home occupiers by their motivations for relocation. The “constrained choice” residents, described their move as being linked to limited other housing options stemming from affordability concerns (Bevan, 2009). Some residents have spoken of difficulty making mortgage repayments in retirement while others recalled relationship breakdown or loss of employment (Bevan, 2007, 2009). These residents may be associated with shorter geographical moves and often found the only other accommodation choice available to them were flats, which did not have the advantages of larger internal space and gardens offered by Park Homes (Bevan, 2009). Some residents have discussed how they preferred Park Home ownership to renting, which was their only other choice of tenure, and several also commented on how Park Homes were the only way they could afford the style of accommodation they desired in the, often picturesque, location they wanted to live (Bevan, 2007, 2009). Separate research completed in the Borough of Wyre in North West England found similar reasons cited by Park Home selling agents, also drawing attention to potentially low utility bills and maintenance costs (North Star Consulting & Research, 2016).

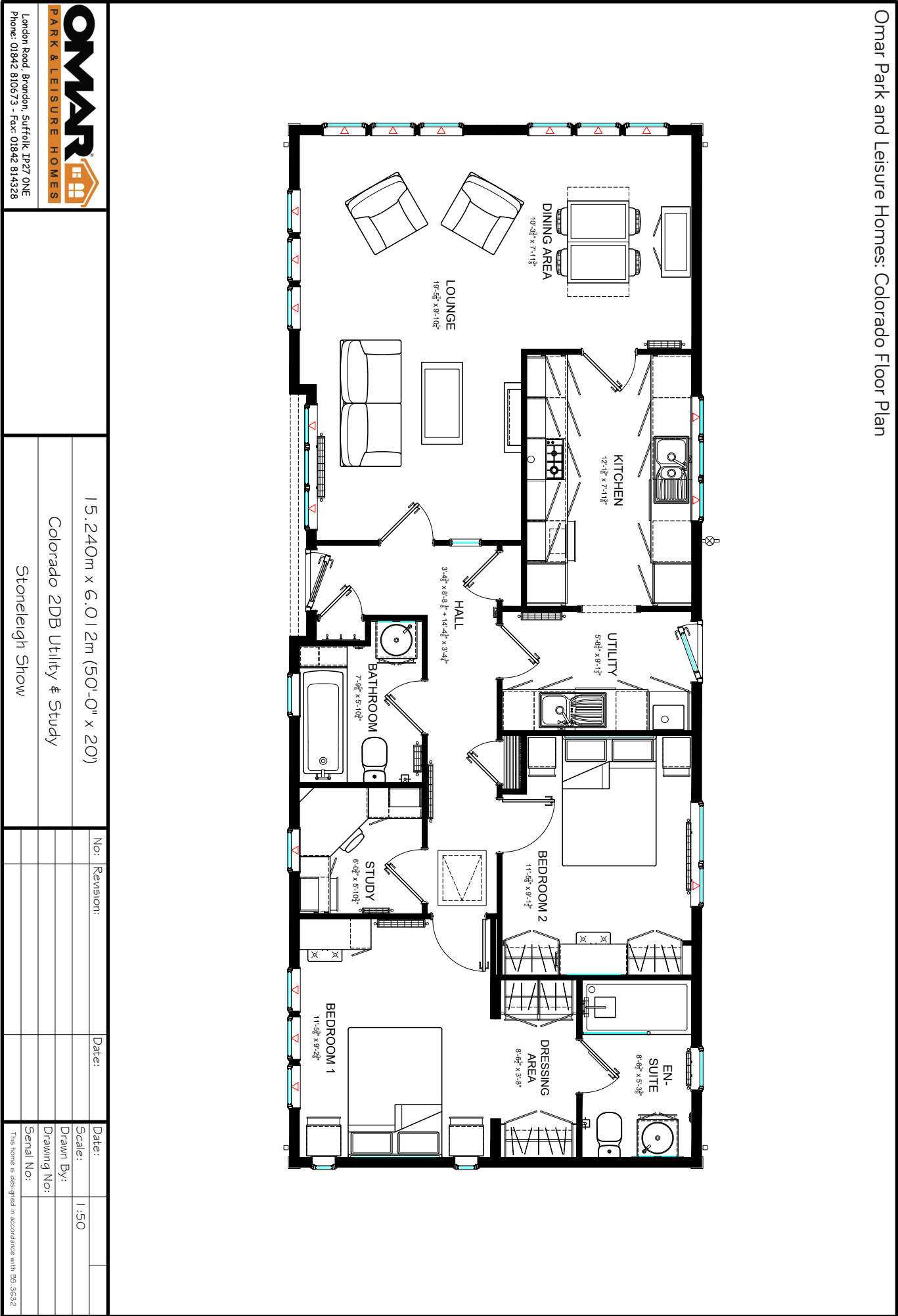
The second group Bevan (2009) has previously identified were the “retirement lifestyle” residents. These Park Home residents were positively attracted to the particular environment that parks offered. Such residents discussed the peaceful and secure environment that parks could provide. In Scotland Bevan (2007) found that some residents had wanted to leave their previous homes because of crime and poor relations with neighbours and were attracted to the quieter environment of a mobile home park. Previous research has also identified residents who emphasise the ability to ‘downsize’ and free up equity which could fund leisure pursuits and trips abroad (Bevan, 2007, 2009). This group of residents were more likely to have actively planned for their retirement and many had made far larger geographical moves (Bevan, 2009). The ability for some residents to stay on parks before purchasing a home has been highlighted by other research in the past (North Star Consulting & Research, 2016).

However, Bevan (2009) found that one motivation for relocating to a Park Home was true of some people in both groups: health concerns. These residents were particularly attracted to the one-level design of Park Homes:

We were living in a house, but my wife has Parkinson's disease. She also has severe arthritis. And she couldn't get up the stairs, so we had to sell the house and try and get a bungalow. But down here they're about £500,000, for a decent one. So, well, we'll go for a Park Home
(Male resident quoted by Bevan, 2009)

Some of these residents acknowledged that Park Homes may offer advantages should their health deteriorate further. The potential for Park Homes to offer independent living for a longer period was also identified by the Wyre Council study (North Star Consulting & Research, 2016). In Scotland, the interrupted employment and lost income resulting from poor health was also discussed and the ability to become more financially secure through purchase of a Park Home was identified as an advantage (Bevan, 2007).

Omar Park and Leisure Homes: Colorado Floor Plan



3.4.2 Life on the Park

A major survey into Park Home living in England and Wales previously found that 76 per cent of residents were satisfied or very satisfied with life on their park, compared to 94 per cent of owner occupiers, 81 per cent for social renters and 82 per cent for private renters (Berkeley Hanover Consulting, 2002). The research found that 18 per cent of park residents were dissatisfied or very dissatisfied.

An advantage of Park Home living repeatedly identified is the sense of community on parks and the shared outlook among residents (Bevan, 2007, 2009; BH&HPA, 2017a, 2017b). This has been connected with the feelings of safety and security associated with Park Homes, which not only develops from the design of parks and their rules, but also because of the informal social surveillance conducted among residents (Bevan, 2010).

Bevan (2011) has also written of the extent to which the Park Home lifestyle is connected to a sense of being on holiday. He found that some residents discover Park Homes through previous holidays while others develop a sense of “home as holiday” because of the lifestyle on the park:

They're very, very quiet. There are no children allowed to live here. It's just the whole atmosphere which we still experience, after over, nearly 11 years. And you feel semi-permanent, as you do when you're on holiday. I think that's the best way I can put it. You don't feel as if you're in a fixed situation, although of course you are. The atmosphere pervading is one of relaxation

(Male resident quoted by Bevan, 2011)

Disadvantages of life in a Park Home have also been identified, often focussing on the potential for poor relations with park owners. UK and Scottish Government consultations and previous research have identified

issues such as: sales blocking and/or pressure to sell; poor maintenance of parks, including lighting, sewerage and landscaping; issues with provision or charges for utilities; excessive increases in pitch fees; commission rates higher than 10 per cent on sales; allegations of harassment, bullying and intimidation; and damage to personal property (Bevan, 2007, 2009; Riseborough 2014).

There are different figures on the prevalence of such experiences. Berkeley Hanover Consulting (2002) found that in England and Wales:

- 93 per cent of residents said that they had not experienced undue pressure to leave or sell their home
- 71 per cent of residents reported that they had ‘never’ been aware of undue pressure to leave being placed on others on their park
- 57 per cent of residents reported that they had ‘never’ been aware of undue pressure to sell to the operator being placed on others on their park

Consumer Focus Scotland (2013), who spoke to 151 Park Home residents in Scotland, found that:

- 42 per cent reported problems related to electricity, mostly connected to billing and costs but also the supply and access to their meter. 97 per cent of those to report these problems purchased their electricity through the park owner
- 40 per cent reported at least one problem related to maintenance, security or safety standards – 84 per cent of those identifying issues raised concerns related to roads or pathways and 69 per cent to street/road lighting. However, 28 per cent said that this was having very little or no impact on their quality of life
- 27 per cent reported a problem with their written statement or pitch fee
- 18 per cent reported problems with a park owner or manager, including intimidation, abuse, violence and pressure to leave
- 16 per cent reported problems with gas or fuel supply, cost or billing
- 14 per cent reported problems with water supply, cost or billing
- 3 per cent reported a problem with sale blocking

Some studies have also drawn attention to how management styles can deteriorate when a new operator takes over (Bevan, 2010). Previous research has also demonstrated the impact poor owner-resident relations can have on feelings of security, belonging and health, and how they can create a fear of speaking out (Bevan 2010). Such problems can undermine the ‘sanctuary’ benefits of the Park Home experience sought by residents (Bevan, 2011). Bevan (2009) notes how rogue operators also damage the concept of Park Homes more widely.

However, it should be noted that significant reforms have been introduced in Scotland since all of this research has been completed. These include major changes to written statements, including the abolition of the requirement for park owners to approve buyers of Park Homes being resold on their sites, as well as the introduction of the new licensing system, including a fit and proper persons’ test. It is unknown at this time to what extent these initiatives have been successful in reducing some of the problems highlighted above.

Other potential problems identified with Park Home living include accessibility to shops and services; fire concerns around the storage of oxygen for people with breathing difficulties (perhaps an issue in any form of accommodation); the impact of harsh Scottish climates; and ambulance accessibility issues on some sites (Bevan, 2007, 2009; Riseborough, 2014).

Whilst the qualitative and survey data discussed above provides a partial snapshot into the benefits and disadvantages of Park Homes, there appears to have been no holistic evaluation of this choice of retirement living, as is starting to be conducted for sheltered housing and extra care developments (see Kneale and Smith, 2013; Holland et al., 2015). Research which explored the impact on quality of life, mental and physical health and service use of new residents over time would contribute greatly to our understanding of the role Park Homes can play.



Image taken in Homelands Park, Bridgnorth, Shropshire - provided by BH & HPA

3.4.3 Adaptability

Given the popularity of Park Homes among some older people it is perhaps surprising that there appears to have been no comprehensive research conducted on the accessibility and adaptability of the units. The potential advantages of being able to tailor a Park Home to one’s own requirements has been identified previously:

We sold the house and what we made on the house allowed us to buy this and do it up the way we wanted it. We bought it as a shell and converted inside to suit me - no problem adapting it. It's brilliant inside. I've got it the way I want it. The floors are on one level. As far as I'm concerned I couldn't get anything better anywhere else, because it's been done as I want it. The house itself, I wouldn't change it, it suits exactly what I need.
(Participant quoted by Bevan, 2007)

Bevan (2009, p20) comments that “there is certainly an issue in how far the design of Park Homes can move towards an incorporation of the key features of lifetime homes standards”. Riseborough (2014) cites the work of occupational therapist Barbara Hobbs who highlights how Park Homes can be designed to provide good accessibility and support high levels of independent living. There is clearly a need for significantly more research in this area.

3.4.4 Fuel Poverty and Energy Efficiency

Fuel poverty and energy efficiency have also been discussed as a problem in relation to Park Homes in the past. Consumer Focus Scotland (2013) found that 20 per cent of survey respondents reported finding it difficult to pay for their energy bills and 24 per cent found it difficult to heat their home in the winter. Research completed by Marches Energy Action, cited by Preston and Jones (2004), found that “Park Homes exhibit very low standards of energy efficiency and as such residents are at higher risk from fuel poverty” (p4). There have been various initiatives which have sought to upgrade the energy efficiency of Park Homes in the past (Preston and Jones, 2004; Alba Building Sciences Ltd, 2011).

However, it should be noted that much of this research was completed some time ago. Table 1 demonstrates the notable improvements in the standards set for thermal transfer for Park Homes over the years and the considerable difference between BS 3632 and the BS EN 1647 standard used for holiday caravans². It is also notable the extent to which Park Homes standards are approaching those expected of mainstream dwellings by building regulations. In addition, some manufacturers claim the U-values for their Park Homes are even lower than those mandated by BS 3632 (see Omar, 2018, for example).

² U-value is a measure of thermal transfer. The lower the value, the better insulation provided.

Table 3.1

	Maximum average U-value of Construction Element (W/m²K)				
Standard	External Wall	Floor	Roof	Windows & doors	All elements
BS EN 1647 Grade 1					1.7
BS EN 1647 Grade 2					1.7
BS EN 1647 Grade 3					1.2
BS 3632: 1970	1.7	1.7	1.7	-	-
BS 3632: 1981 and 1989	1	1	0.6	Overall external wall U-value (including windows and doors) 1.8	-
BS 3632: 1995	0.6	0.6	0.35	Overall external wall U-value (including windows and doors) 1.8	-
BS 3632: 2005	0.5	0.5	0.3	Overall external wall U-value (including windows and doors) 1.0	-
BS 3632: 2015	0.35	0.35	0.2	1.6	-
2017 Scottish Energy Building Regulations	0.22	0.18	0.15	1.6	-

Sources: Johnston and Miles-Shenton, 2018; Scottish Government Building Standards Division, 2017.

Unfortunately there is little empirical data on the thermal performance of Park Homes outside of the factory setting:

“It is...clear from the available literature that there is a distinct lack of empirical evidence available on the in situ energy performance of holiday or Park Homes. Although some data are available on Park Homes, this tends to present the overall reductions in energy use that have been achieved by applying specific solutions, such as external wall insulation or higher performance windows...Very few published studies are available that have measured the in situ performance of the building fabric in any detail either prior to or post refurbishment.”

(Johnston et al. 2017, p211-12)

Indeed, it is the in situ performance which is most important to understand. Johnston et al. (2017) investigated the energy performance of five holiday caravans in situ and found that all five performed less well than expected. However, the authors note that the so-called ‘performance gap’ was found to be lower than for some new build dwellings, potentially attributable to the factory controlled construction methods used. Notably, the study also found that performance of the caravans was comparable to the new-build dwellings, many of which were built to exceed the most recent building regulations at the time. However, it should be noted that this comparison is not area-weighted and the caravans are significantly smaller than the new build dwellings (Johnston, 2018). It should also be borne in mind that the study only used a small sample of caravans.

One study identified by Johnston et al. (2017) as having measured in-situ performance was completed by Alba Building Sciences Ltd (2011) using 100 Park Homes in locations around the UK. Whilst the study itself focused on the potential improvements to the energy performance of Park Homes, it provides some useful data on the age of a home and its performance. These data are plotted in Figures 3.1 to 3.6. Leaving aside the data for glazing, the data shows a positive correlation between age of the Park Home and poorer performance, suggesting that the performance of Park Homes has improved as the BS standards have become higher. This is a basic analysis and caveats should be borne in mind: statistical significance of the correlations has not been tested; outliers have not been removed; the data was collected during a project which took place between 2008 and 2011; the correlations depicted do not control for other factors such as the homes’ location; and a sample of just 100 homes were used. More research is needed in this area which compares the in situ energy performance of Park Homes to that expected in BS 3632: 2015 and to new build bricks and mortar dwellings.



Figure 3.1 Wall U-Value by Age of Park Home

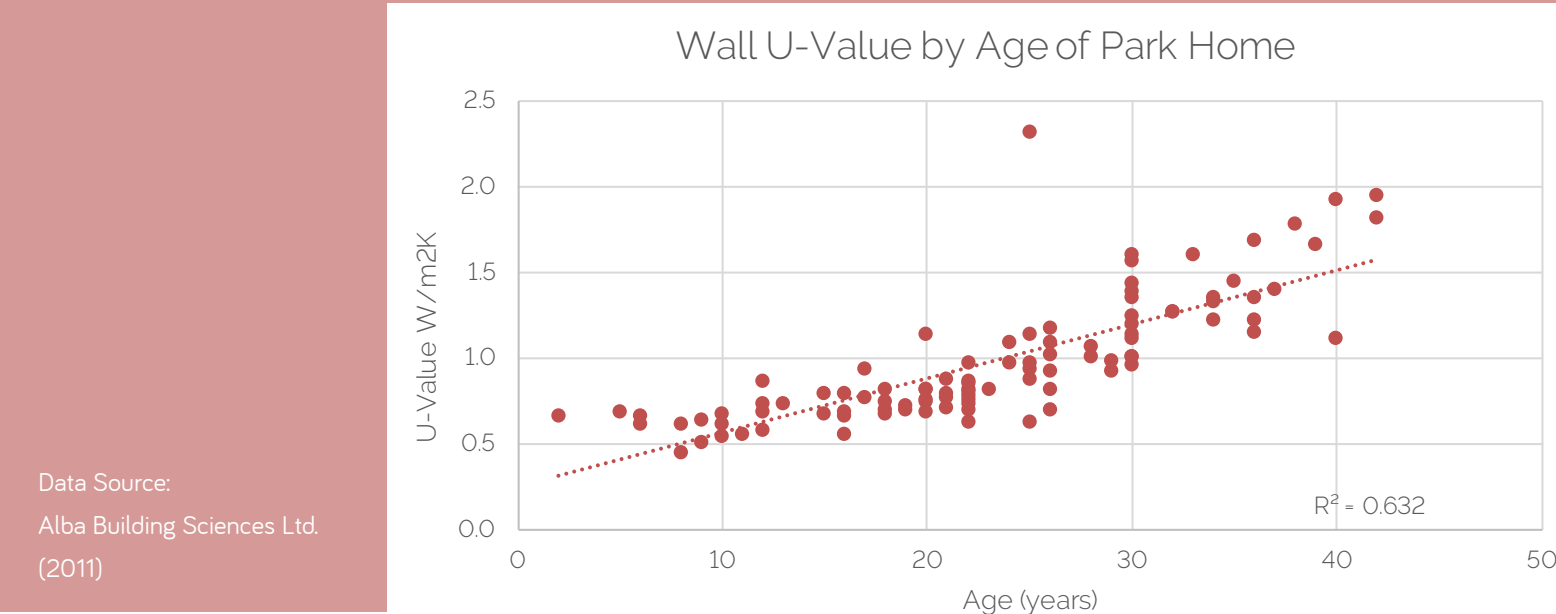


Figure 3.2 Roof U-Value by Age of Park Home

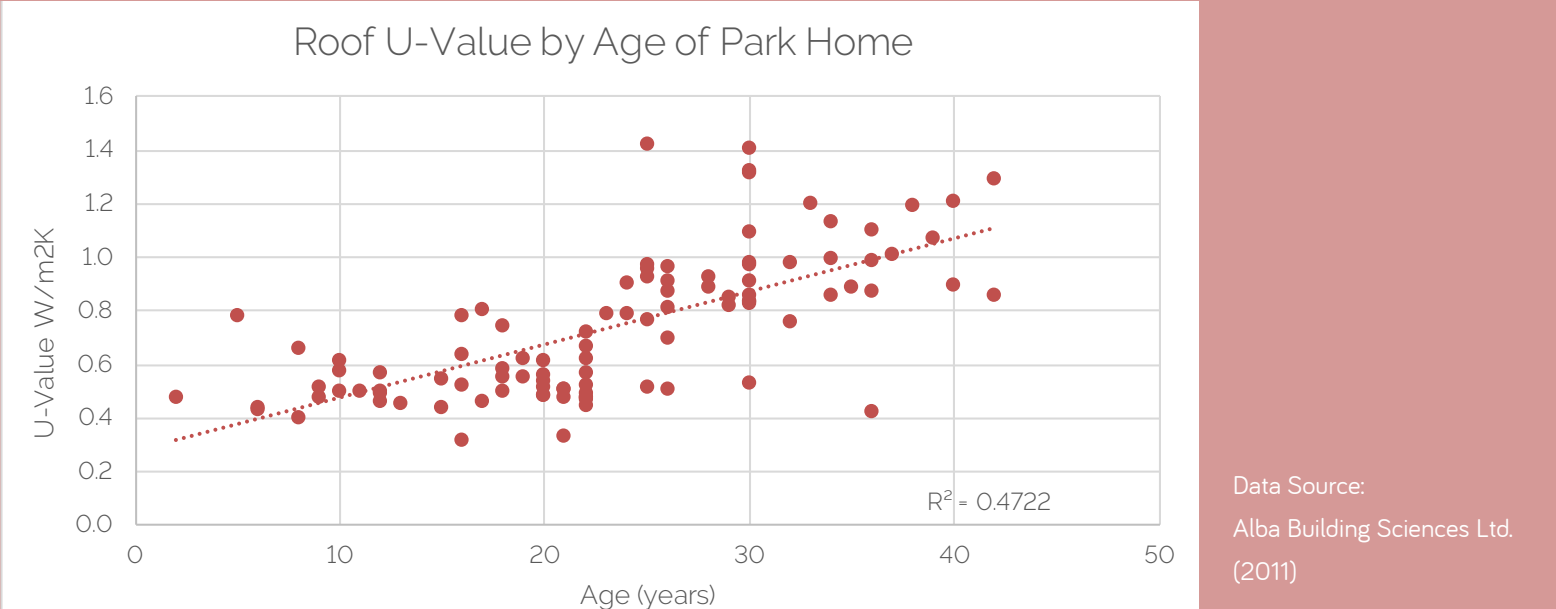
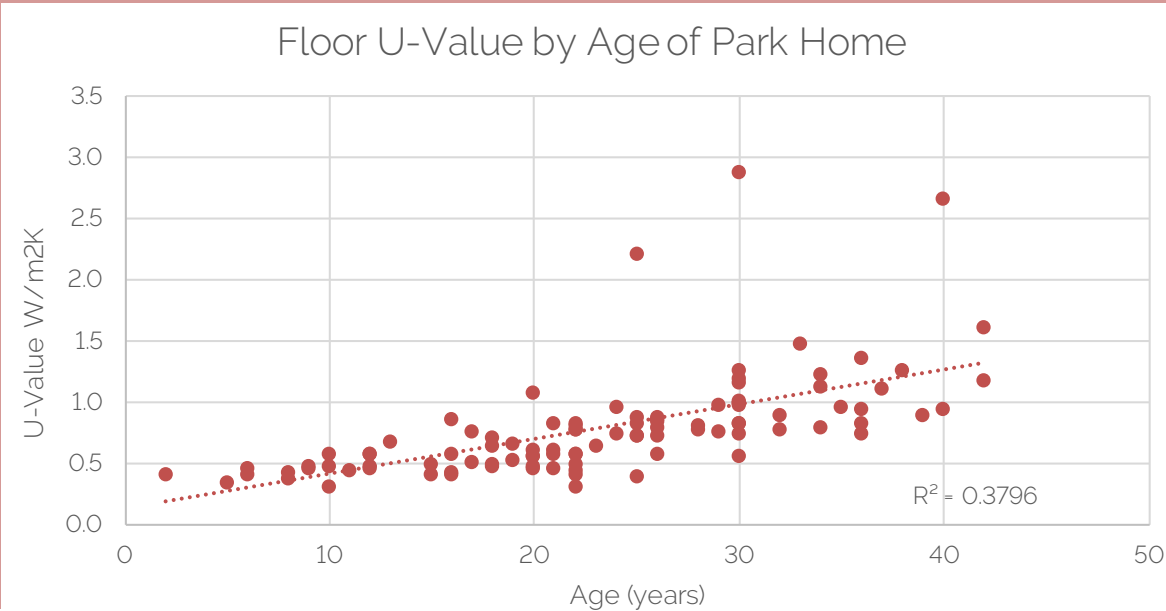
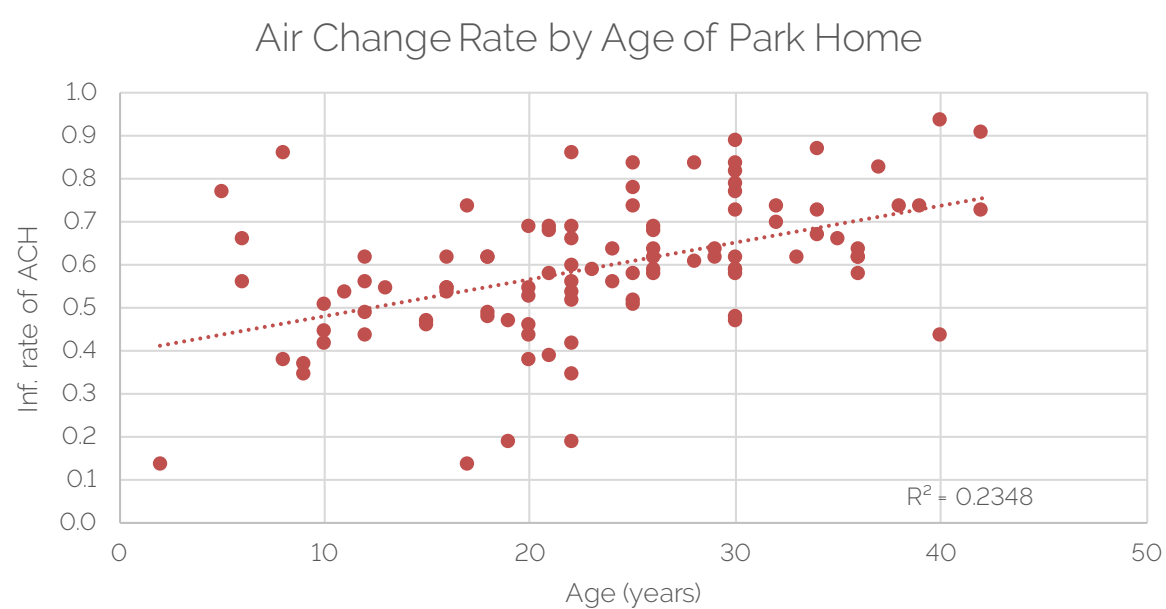


Figure 3.3 Floor U-Value by Age of Park Home



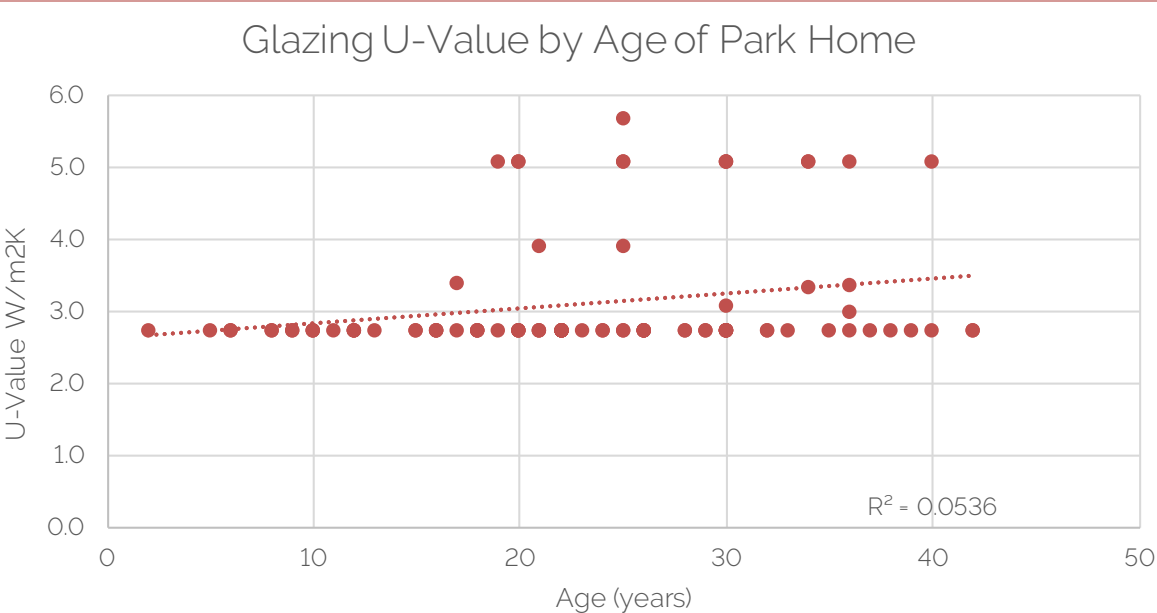
Data Source:
Alba Building Sciences Ltd.
(2011)

Figure 3.5 Air Change Rate by Age of Park Home



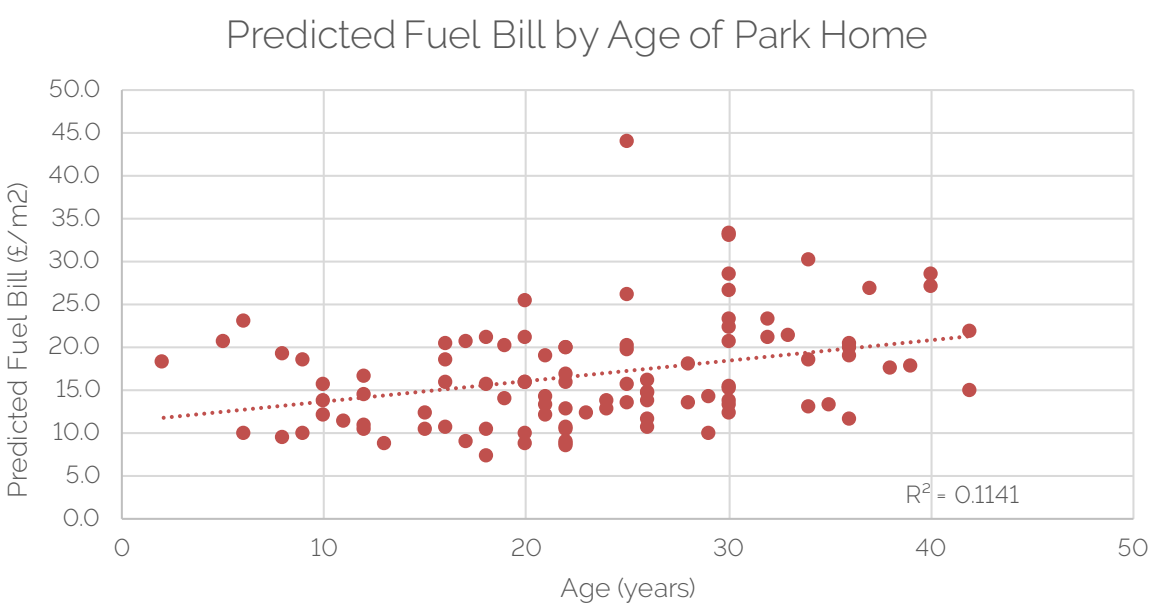
Data Source:
Alba Building Sciences Ltd.
(2011)

Figure 3.4 Glazing U-Value by Age of Park Home



Data Source:
Alba Building Sciences Ltd.
(2011)

Figure 3.6 Predicted Fuel Bill by Age of Park Home



Data Source:
Alba Building Sciences Ltd.
(2011)

3.4.5 Leaving Park Homes

There appears to have been no comprehensive research into why people leave Park Homes and the nature of their destination. North Star Consulting and Research (2016) found that of respondents to its small study in the Borough of Wyre, 40 per cent of Park Home residents reported not needing to move within the next five years, while 30 per cent said they did need to move. Motivations varied, from desiring smaller accommodation, greater proximity to shops or amenities, cheaper accommodation, or because of the condition of their property. Common issues identified were the desire for specialist or supported accommodation and all those seeking relocation were looking for socially managed rented solutions which may be indicative of the income of this group.

3.4.6 Park Homes and Planning

There is relatively little discussion of Park Homes in relation to land use planning in previous research. Beckwith (1998) discusses planning in relation to residential caravan parks in Western Australia with regard their low density and the need for potential protections from redevelopment given the lack of security of tenure afforded to such residents at that time. Bevan (2009) similarly mentions how the challenge of meeting sufficient densities to fulfil planning requirements may be holding back new Park Home developments. He also writes:

A further challenge in terms of new developments is in relation to raising awareness of the Park Home sector, and overcoming the perceived antipathy of statutory agencies towards Park Homes which belies the contribution that Park Homes can make within local housing markets.

(Bevan, 2009, p18)

The vulnerability of Park Home residents living on sites without planning permission in Scotland has also been mentioned in previous work (Bevan, 2007).

Whilst still not the primary focus of their study, one of the most significant reflections on planning and Park Homes is presented in an older piece of research completed by Niner and Hedges (1992). They found that park owners generally thought that planning officers were ignorant of mobile homes, which they may associate with sites for gypsies, and that they possessed a “hatred” toward such developments. The authors found that planning constraints did exist for new park development but that these often related to their location, falling down against policies connected to the countryside and greenbelt. The study found that in three of the four areas studied, planning authorities treated Park Homes as a type of residential development and would have mainstream housing policies applied to them. It was thought that Park Homes may struggle to demonstrate that their design complimented their surroundings. Niner and Hedges (1992) reported that park owners were supportive of a loosening of planning policies towards future development, whereas planners were frustrated by guidance which allowed the development of gypsy sites in greenbelt areas under certain conditions.

More recently, planning consultant Ian Butter (2012) completed a report on planning and Park Homes for the BH&HPA. He similarly argues that planning authorities in the UK increasingly require Park Homes to meet mainstream housing policies and are generally unsupportive of their development, quoting planning policies which demonstrate concerns surrounding the design and appearance of Park Homes. Butter (2012) provides draft supplementary planning guidance for Park Home development. As well as highlighting the benefits of Park Homes, it argues that developments should be given weight equal to that of other types of residential development by planners, who should not make prima face objections. Butter (2012) contends that planning should have influence over the use of land, access and some landscaping issues, with other areas remaining in the hands of licensing officers. In addition, the guidance suggests that the visual impact of Park Homes is muted by planning conditions which restrict the colours used for external elevations and roofs. It is also argued that decision notices make clear that Park Homes do not enjoy the same permitted development rights as mainstream housing.



Images provided by Omar Park and Leisure Homes

4.1 Introduction

This section details the methods used to complete the research. There were five strands to the study: a workshop with older people; analysis of a secondary dataset on parks and Park Homes in Scotland; identifying and analysing Park Home planning policies; gathering and analysing perspectives on planning in relation to Park Homes; and the identification and discussion of specific instances of Park Home development in relation to planning. Each of these strands is detailed below.

4.2 Workshop

A workshop was organised for people in later life considering relocation. The aim of the workshop was to present the concept of Park Homes and capture their views and questions. Recruitment was managed by VOICE at Newcastle University. Eligibility criteria for participation was: being retired or close to retirement; and having moved recently or considering relocation currently. Participants were provided with shopping vouchers to compensate them for their time.

The workshop took place in February 2018 in Newcastle upon Tyne over around four hours. It was facilitated by Moyra Riseborough, who is an independent housing consultant and has completed previous work on older people's choices and on Park Homes (Riseborough, 2014). Nine individuals participated.

The workshop began with a presentation which outlined the background to the research and provided information on the concept of Park Homes, with particular reference to Scotland. Participants were asked to complete two exercises in small groups. In the first exercise they were asked to build their own residential park, making choices such as the amenities they would be seeking on site and nearby and identifying locations they thought would be attractive for such a development. In the second exercise participants were asked to consider Park Home development from a planning perspective by engaging in a "SWOT" analysis, detailing the potential strengths, weaknesses, opportunities and threats.

The exercises served to facilitate general discussion around the concept of Park Homes. The session was not audio-recorded. Instead notes were taken of the discussions which occurred and the questions raised by participants.

4.3 Data on Parks and Park Homes

A dataset was sought which could provide an overview of the number, location and features of residential parks and Park Homes in Scotland. Bevan (2007) had previously used census data to explore the number of households residing in a caravan or other mobile or temporary structure. The data from the 2011 census allowed us to provide an update on this statistic. However, this data is quite crude in relation to Park Homes, as it includes households who reside in holiday caravans and house boats.

The *Residential Parks Guide 2017/18* was identified as a suitable data source to provide more accurate information for this element of the research. The guide is compiled annually. From correspondence with the editor it was gleaned that a database of parks has been built up over 15 years by mailshotting site owners and soliciting free entries. For each new edition of the guide a letter is sent to the parks on the database asking for corrections to the information held. The data is updated with further information provided. Without an update the information already held is republished. The majority of listings are provided free of charge with a small number paid for by parks (indicated by a different font colour). The guide is divided by UK region, with a specific section for Scotland. Data are provided on the park location within Scotland, the number of residential, as opposed to holiday, caravans on the park, and various park features, rules and memberships.

The data provided in the guide were entered into an electronic database to aid analysis. The guide is focussed on residential parks but does list some which the guide indicates have no residential units. These were removed from the database before analysis began. The postcode data was used to locate the local authority within which the park sits. Various pieces of analysis of the data were then conducted, such as counts of the number

of parks and Park Homes in different local authority areas, the range and average number of residential units on parks, and the proportion with various features.

There are obviously considerable limitations to this approach. The focus of the research was on planning and this strand of the study was only intended to present a broad snapshot as background. It is possible that some parks published in the guide are no longer active. However, previous research by Consumer Focus Scotland (2013) identified 92 parks. It is therefore likely that the 62 identified in the present research represents an underestimate of the number of parks (and hence Park Homes) in Scotland.

4.4 Park Home Planning Policies

This element of the study sought to identify and gather data on planning policies related to future Park Home development. The aim was to identify whether planning authorities were supportive or unsupportive of future development and their reasoning. The process of identifying policies began by locating a planning authority's Local Plan or Local Development Plan (LDP). This was downloaded and the search function was used to identify potentially relevant policies. The following search terms were used: "Park Home"; "mobile home"; "caravan"; "temporary"; and "permanent". Supplementary Planning Guidance (SPGs) was also considered. SPGs with relevant titles were downloaded and searched in the same way.

Inclusion criteria was drawn up to facilitate the positive identification of relevant policies. In addition to being clearly relevant to Park Homes, policies needed to relate to future development, rather than existing sites, and needed to highlight a broad principle in relation general development, rather than specific contexts. The following were excluded from identification:

- Policies which cover protection/redevelopment of existing sites
- Policies on development in the countryside which mention the (un)acceptability of residential caravans
- Policies which did not allow residential caravans where this was discussed within a tourism context
- Policies relating to development in conservation areas
- Policies regarding gypsies and travellers
- Policies regarding specific sites

This process was repeated for all 34 planning authorities in Scotland – the 32 local authorities and the two national parks. For Highland, the Highland-wide LDP was searched as well as the LDPs or Local Plans for the areas within Highland.

Following this process, each planning authority was categorised in one of four groups in relation to future Park Home development

- No relevant policy
- Directly unsupportive
- De facto unsupportive
- Supportive with conditions

De facto unsupportive planning authorities were those where a specific policy on general Park Home development was supportive in cases which would actually rule out sites in the way they are being considered in this study. Shapefiles for the 34 planning authorities were downloaded and the unsupportive and no policy planning authorities were mapped using QGIS software. After identification and categorisation of a policy, it was analysed further to determine its rationale and to detect any other notable features.

The above process was then repeated for planning authorities which had made a draft LDP available on their website. Changes between current and prospective positions on Park Homes were analysed.

4.5 Perspectives on Planning and Park Homes

This strand of the project aimed to capture and explore perspectives on Park Homes, particularly in relation to

planning. It involved the collection of qualitative data. There were broadly two groups of professionals whose opinions were sought: those working within planning authorities and those involved in the development of parks.

Planning authorities with higher numbers of parks or Park Homes in their area were targeted for involvement. Web searches using terms such as “new Park Home development” were also conducted to identify areas which may have seen new development recently. Weight was also given to the policy stance of the planning authority, with a mix sought between those without a Park Homes policy and those unsupportive of future development.

Twelve planning authorities were contacted and invited to participate in the research. Generally a phone call was made to the planning department to provide background to the project and ask the most relevant person to whom further details about the research should be sent. It was requested that either a development management officer or a policy officer participate in the study, or if possible, both. One planning authority declined, four did not respond and seven agreed to participate (Table 4.1).

Table 4.1 Policy Position of Planning Authorities Involved

Planning Authority	Policy Position
PA1	Directly Unsupportive
PA2	Directly Unsupportive
PA3	No policy
PA4	Directly Unsupportive
PA5	Directly Unsupportive
PA6	No policy
PA7	No Policy

There are a relatively small number of Park Home manufacturers in the UK, with 16 identified in this study through web searches and from publications such as Park Home and Holiday Caravan magazine and the Residential Parks Guide. Companies which had been identified as supplying units to Scottish parks through web searches were targeted. Eight manufacturers were invited to participate. One declined, four failed to respond or to arrange an interview, and three participated.

Park operators were identified for potential involvement in the research by the Scottish parks data acquired and recommendations by representatives of the BH&HPA, with some targeted due to apparently recent development taking place. Six operators were invited to participate. One declined, three did not respond or failed to arrange an interview, and two participated.

In addition to the above, a number of other individuals were invited to participate in the research. These included occupational therapists, a planning consultant, a housing strategy officer and Park Home residents. These were suggested by other participants or members of the steering group for the research and served to provide further opportunities to explore perspectives on Park Homes.

Interviews with the Minister for Local Government, Housing and Planning and the Chief Planner were requested. It was agreed that a relevant Scottish Government official would provide a response to a list of written questions, which were subsequently submitted. It was then confirmed that the Sottish Government’s response would take

the form of a factual statement on current policy. It was explained that this had been delayed due to annual leave over the summer period and the fact that the topic impacts on a number of areas across the Scottish Government. Unfortunately, no written statement had been received at the time this report went to print.

In total, 27 individuals participated in the research (see Table 4.2). Data was captured via focus groups or interviews with participants. These were semi-structured in nature, allowing flexibility with regard the number and type of questions asked. Separate interview guides were drawn up for different participant types, developed based on the aims of the research, previous literature and questions raised during the workshop element. Three focus groups were held, two in-person and one via telephone. One of the interviews was conducted in-person, the remainder via telephone.

All participants were provided with an information sheet which detailed the background to the research and what participation entailed before taking part. They also completed a consent form indicating that they understood what was involved and that they agreed to participate. All data was treated confidentially and all identifying details were removed to respect participant anonymity³. All interviews and focus groups were audio-recorded and transcribed. The transcripts were analysed thematically which was facilitated by NVivo computer software.



Image provided by Richmond Lodge and Park Homes

3 It should be noted that no inference should be drawn from the manufacturers who provided images for this report, as these companies did not necessarily participate in the research.

Table 4.2 Policy Position of Planning Authorities Involved

Patricipant	Pseudonyms	Method of Data Collection	Planning Authority
Development Management Planning Officer	Development Management 1 (DM1)	Focus Group	PA1
	Development Management 2 (DM2)		
	Development Management 3 (DM3)		
	Development Management 4 (DM4)	Interview	PA2
	Development Management 5 (DM5)	Interview	PA4
	Development Management 6 (DM6)	Interview	PA6
	Development Management 7 (DM7)	Interview	PA5
Planning Policy Officer	Planning Policy 1 (PP1)	Focus Group	PA1
	Planning Policy 2 (PP2)	Interview	PA3
	Planning Policy 3 (PP3)	Interview	PA4
	Planning Policy 4 (PP4)	Interview	PA5
	Planning Policy 5 (PP5)	Interview	PA6
	Planning Policy 6 (PP6)	Focus Group	PA7
	Planning Policy 7 (PP7)		
	Planning Policy 8 (PP8)		
Manufacturer	Manufacturer 1	Interview	-
	Manufacturer 2	Interview	-
	Manufacturer 3	Interview	-
Occupational Therapist	Occupational Therapist 1 (OT1)	Focus Group	PA1
	Occupational Therapist 2 (OT2)		
	Occupational Therapist 3 (OT3)		
Park Operator	Park Operator 1	Interview	-
	Park Operator 2	Interview	-
Park Home Resident	Resident 1	Interview	-
	Resident 2	Interview	-
Housing Strategy Officer	Housing Strategy Officer	Interview	PA1
Planning Consultant	Planning Consultant	Interview	-

4.6 Park Home Planning Case Studies

This element of the project sought to supplement the data captured from professionals on planning processes for Park Homes with the planning history of previous developments. One case study was sought for each of the five ways in which Park Home development can legally take place. Potential cases were identified through analysis of interview and focus group transcripts and through web searches. Examples were sought from approximately the last ten years. The relevant documents were accessed via the planning portal of the relevant planning authorities.



Images provided by Stately-Albion

5 Views of Older People

5.1 Introduction

This section provides an overview of the findings from the workshop held with people in or nearing retirement who had either moved recently or were looking to move in the near future. The workshop explored participants' views and preferences in relation to Park Homes. This section also presents some of the perspectives of Park Home manufacturers and park operators on the questions and issues raised by older people.

5.2 General Views

There was generally only a low level of awareness of Park Homes as an option in retirement. Some participants believed that "Park Homes" was a brand rather than a form of accommodation. Two participants had previously thought about this option and were interested in exploring it further. Some were struck by what they viewed as the sizeable and attractive layouts of Park Homes displayed in the presentation, with comments on how the style of living is aspirational rather than a more typical downsizing option. There was discussion around the process of deciding to relocate generally and how one decides what they can and cannot accept losing from their current home environment. Participants expressed attraction toward Park Homes in Scotland due to the new licensing system adopted.

5.3 Planning 'SWOT' Responses

Participants contributed their views from a planning perspective on the strengths, weakness, opportunities and threats of a large Park Home development taking place on the site of a piggery and stables in a rural location close to a former open cast coal mine near a small market town.

5.3.1 Strengths

Participants considered that the development could:

- Improve or maintain local services such as local traders and GP surgeries
- Attract local business to the town
- Improve local facilities, also attracting businesses and services nearby
- Provide opportunities for new Park Homes residents to enjoy the countryside
- Support the existing farm through diversification of income streams
- Increase income to the local authority
- Encourage the use of the formerly industrial locality as a destination, attracting families and tourists.

5.3.2 Weaknesses

Participants also identified a number of weaknesses of such a development:

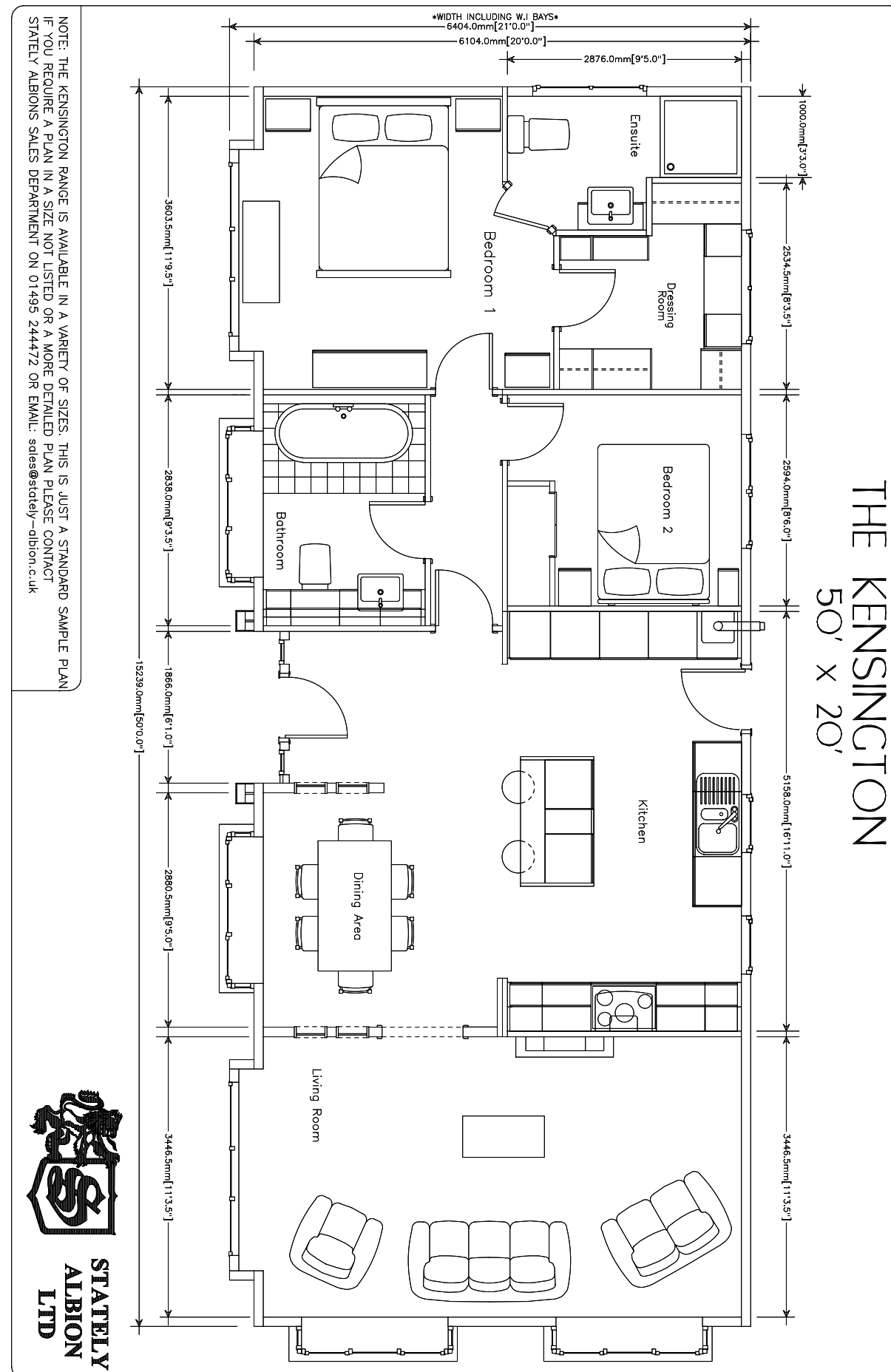
- Increase in traffic, potentially reducing walkers and cyclists
- Lack of services to serve new residents, including those used more frequently by older people, in addition to refuse services and broadband availability
- Landscaping concerns
- Hazards relating to proximity to former open cast mine, such as flooding
- Loss of a greenfield land
- The impact and objections from the market town
- Negative impact on tourism

5.3.3 Opportunities

The perceived opportunities presented by the development included:

- Improving the quality of life for residents moving to the park
- Business opportunities for local firms and traders

Stately-Albion: Kensington Floor Plan



- New residents bringing talent, skills and services to the local area and community
- Demonstrating the local authority's proactive vision in acknowledging the ageing population and how to best support them, supporting future grant applications
- Demonstrating renewable energy opportunities, with the park experimenting with alternative energy supplies

5.3.4 Threats

Finally a number of threats were identified by participants:

- Negatively impacting on the appearance of the local area and placing a rural and appealing natural area at risk
- Setting a precedent which encourages further development of Park Homes and mainstream housing
- Increasing pollution as a result of more traffic, waste, light and residents
- Changing the local electorate and the existing political balance
- Placing a burden on local social care services and budgets
- Negatively impacting the local housing market
- Negatively impacting on the reputation of the area
- Increasing the number of English people living in Scotland

5.4 Desires

Several participants discussed their desire for a park to be located close to a village or market town. They highlighted the need for facilities and services which enable convenient travel to such settlements, such as disabled parking spaces, a regular bus service and a railway station. Some participants suggested that parks would be attractive if they were less than an hour by rail from a larger city. The importance of a GP surgery and hospital being present nearby was also highlighted. Regarding scenery of the location, several participants expressed an attraction toward the coastline or countryside.

Several desirable features of parks were highlighted. These included good broadband and mobile phone connections, secure storage for bicycles and mobility scooters, a mains gas supply, and a basic shop on site. Some participants also raised more distinct facilities that they would find attractive. A flexible community hall or social centre on site was discussed, which participants thought could be useful for having breakfast together, watching films and for celebrating special occasions. One participant opined on the usefulness of a clubhouse for guests of residents to stay over, potentially removing the need for larger Park Homes to accommodate them. The potential for a laundry room with a washing and ironing service was also raised, while some also discussed the provision of care services on site. Safety and security of parks was seen as important, with some attracted to gated access at the front of parks. Participants also spoke of how they would be attracted to parks with units which had good levels of insulation.

Regarding the management of parks, participants were attracted to rules which allowed children to visit and sites with good maintenance standards. One participant spoke of how family run parks might be especially attractive, arguing that they may be better for achieving timely repairs and maintenance. Some participants also expressed an interest in renting and shared ownership models for Park Homes.

Finally, the workshop discussion highlighted the importance of the ethos of a park and the relationships with other residents. Several spoke of how they would be attracted to a park which was mainly occupied by retired people who they felt would be more likely to have similar ideas and be like-minded people. Some also commented on the attractiveness of a good “community feel” but also expressed a desire to avoid an “enforced community” where one feels compelled to engage with others.

5.5 Questions and Issues Raised

During the workshop participants raised a number of questions and issues which they stated would be important if they were to pursue relocation to a Park Home. Several of these related to the layout and operation of parks. They included the presence, nature and quality of: visitor parking; parking for disabled residents; footpaths, street-lighting; and utilities. Participants also asked whether Park Homes included furniture, whether they could be rented out, how families were restricted from sites, whether residents can take pets and whether council tax needed to be paid on top of pitch fees.

There were a particular set of questions or concerns around the longevity of this retirement option. Several of these related to security of tenure, the nature of the five-year licensing system in Scotland and the impact on residents when ownership of a park is transferred to a new operator who manages the site differently. Some also questioned the nature of Park Homes as an asset, seeing it as a depreciating good like a car rather than an investment like a bricks and mortar home. There was reflection upon striking a balance between enjoying later life and leaving an inheritance for loved ones. Participants also asked how one goes about selling a Park Home and whether park operators mandate that residents replace units.

5.6 Responses to Questions and Issues

Manufacturers and operators were invited to comment on some of the issues the workshop participants had raised. They explained that security of tenure for Park Home owners was strong and that some of the confusion in this area stems from the difference with holiday caravans:

Generally, the security of tenure is very, very good in a mobile home park. That security of tenure has no lifetime, it will go on forever...where people get easily confused... on a [holiday] caravan park you have what they call a site licence and the owner of a holiday caravan park can move those units as and when he pleases. They have very, very little legislation on a caravan park and many people in the UK have owned a caravan at some stage and think it's very similar to a residential caravan park when in fact it's not...it is very difficult, near on impossible to move a mobile home on a park without the owner's consent.

(Manufacturer 1)

One of the operators commented that the legislation around security of tenure was so strong that the worry is reversed, with park owners concerned as to who occupies their pitches. In relation to changes in park ownership, another manufacturer explained that this was not that different from a mainstream leasehold arrangement in England and perhaps better:

You can't guarantee [a consistent operator], so that's a risk. If you were to buy a flat, you buy a leasehold, obviously. You pay a ground rent to someone. That's a bit more faceless. Someone else actually owns the land. It's the same sort of scenario really. At least with the park owners, they're a bit more visible. You can speak to them and see them, visibly see them. Whereas, if you are buying a flat [in England], you wouldn't know who it is, to be honest with you.

(Manufacturer 3)

On the issue of a license being revoked, one manufacturer commented on how the interim manager appointed would not be able to evict residents due to their security of tenure.

Manufacturers also explained how selling a Park Home would have few differences with selling a mainstream home. Indeed, the changes to legislation in Scotland in 2013 allow Park Home owners to list their home with an agent.

Another area of confusion highlighted by manufacturers and operators is the perceived requirement to replace Park Homes periodically. Participants clarified that this relates to holiday caravans and not Park Homes. Whilst there is an expectation that the external appearance of units is maintained to a reasonable standard, there is no stipulation on their replacement.

People have experience of caravans. It's not the case with Park Homes. There is no period of the end of the contract. Most of the homes, in fact, all of the homes in the village are of more than an acceptable standard. I've never had to go to someone and tell them to do their home up. They've done it themselves. Because they are in a community they don't want to be left out. They paint their homes every three to five years. They keep them in tremendous condition.

(Park Operator 1)



Image provided by Tingdene Park Homes

6 Data on Parks in Scotland

6.1 Introduction

This section provides a brief overview of data relating to Park Homes in Scotland. It is divided into two subsections, first covering non-permanent accommodation more broadly and then considering Park Homes specifically.

6.2 Non-Permanent Accommodation

The 2011 Census counted 3,775 households residing in a caravan or other mobile or temporary structure (COMOTS). This represented just 0.16 per cent of all households in Scotland. The number of households residing in Park Homes will be lower than this figure, given that the census category includes households living in other structures such as holiday caravans and house boats.

As shown in Table 6.1 the number of households in non-permanent accommodation has been shrinking since 1991. The proportion of households living in this type of accommodation has also fallen, calculated as 0.21 per cent in 2001 (Bevan 2007). Bevan (2007) suggested that the fall between 1991 and 2001 may have been due to the restrictions put in place surrounding the Foot and Mouth outbreak which may have affected the 2001 count. The further fall in the 2011 data appears to show that the reduction may actually be part of a trend. However, it is impossible to know the numbers and proportions of households in Park Homes specifically.

Table 6.1 Number of households in non-permanent accommodation 1971-2011

Year	Households in Non-permanent Accommodation
1971	5,250
1981	6,356
1991	6,429
2001	4,547
2011	3,775

Source: NRS, 2013 and 1971-2001 Censuses cited by Bevan (2007)

There was considerable variation in the number of households and people in COMOTS across local authorities in Scotland recorded in 2011. The five local authorities with the highest proportion of households in COMOTS were: Midlothian; Argyll & Bute; Highland; Dumfries & Galloway; and Shetland Islands. There has been relatively little change in the local authorities with the ten highest proportions between 2001 and 2011 (Bevan 2007). Nine of those with the ten highest proportions in 2011 were also in the top ten in 2001. The five local authorities with the highest proportion of people in households in COMOTS were Midlothian; Highland; Argyll & Bute; Dumfries & Galloway; and Moray. The five local authorities with the highest absolute number of households in COMOTS in 2011 were: Highland; Glasgow City; Midlothian; Fife; and Aberdeenshire. The same five had the highest absolute number of people in households in COMOTS.

6.3 Parks and Park Homes in Scotland

Consumer Focus Scotland (2013) previously identified 92 parks in Scotland, with sites concentrated in Perth and Kinross, Dumfries and Galloway, Fife, Angus, Argyll and Bute, and Aberdeen. The present study draws on data compiled by the Residential Parks Guide 2017/18, built up over 15 years of mailshots and offering free entries. 62 parks were identified. Over half of these were in just six local authority areas (Table 6.2). The number of residential homes on parks varied dramatically. The smallest number of residential homes was two, with many hybrid sites providing only small numbers. The largest site housed 202 Park Homes. The mean and median were 42.2 and 30 Park Homes respectively.

Table 6.2 10 Local Authorities with the Highest Number of Parks

Local Authority Council	Count within LA area
Perth and Kincross	7
Argyll and Bute	6
Dumfries and Galloway	6
The Highland	5
Aberdeen City	4
Fife	4
Aberdeenshire	3
Stirling	3
Angus	3
Moidlothian	3

Source: Residential Parks Guide 2017/18

Moidlothian had by far the largest number of Park Homes, located across just three sites (Table 6.3). There are especially large numbers in Moray, Perth and Kinross, Dumfries and Galloway and the Scottish Borders.

Table 6.3 Ten Local Authorities with the Highest Number of Park Homes

Local Authority Council	Number of Park Homes
Midlothian	392
Moray	228
Perth and Kinross	216
Dumfries and Galloway	184
Scottish Borders	180
East Renfrewshire	145
Aberdeen City	145
The Highland	136
North Ayrshire	134
Fife	130

Source: Residential Parks Guide 2017/18

According to the data analysed, the median distance from a park to the nearest town or village was 2 miles. 28 have a shop on site or “close by” (45 per cent). 39 of the parks were listed as members of the BH&HPA (62 per cent). Only 18 per cent specify that they allow children. Over half have a resident manager (56 per cent) and 32 per cent use liquid petroleum gas (LPG) for fuel. Just eight were listed as having a clubhouse (13 per cent).

7 The Market for Park Homes and Park Home Life

7.1 Introduction

This section details perceptions of the market for Park Homes both in the UK and in Scotland specifically and includes an overview of how purchases and sales are completed. It also explores the perceived advantages and disadvantages of Park Homes as a retirement option among participants and some discussion of why people leave parks.

7.2 Purchases and Sales

The process by which a new Park Home is purchased often begins with the selection of a park which has a spare plot on which the home can be sited. Prospective buyers will then consider different manufacturers of Park Homes who offer a variety of standard models which can have their designs altered to meet any particular needs. It is important to note that once the selection has been agreed between the prospective resident, the manufacturer and the park owner, it is the park owner who actually purchases the home. The prospective resident then purchases the Park Home from the park owner. The park owner will sell the home on at a higher cost than the original purchase price, partly to cover their investment in the land, and it is these sales which create the largest potential for profit from the park’s perspective. However, it should be noted that the rate of sales on new parks can be below what might be expected for a mainstream housing developer. One participant stated that they sold 80 over 15 years. However, this included a recession and took place several decades ago.

It is also important to note that the purchase of a Park Home does not usually require the involvement of a solicitor as the home is not considered real estate in a legal sense, but is instead considered a chattel. Similarly, there is no recording of purchases and sales by the Registers of Scotland. Due to this designation and the fact that the land is not purchased, it is often not possible to purchase a Park Home with a mortgage. However, one participant explained that it is sometimes possible to take out a special loan to fund the purchase.

If a resident decides to sell on their Park Home, historically the park owner would need to approve the prospective buyer. However, since 2013 Park Home owners in Scotland can sell their home without the site owner’s involvement. The changes to legislation in 2013 also allowed Park Home owners to market their homes for sale via agents. When a Park Home sale takes place, the site owner takes commission equal to 10 per cent of the sale price:

That ten percent encourages us to really spend a bit more on the place and keep the place going more... From a developer's point of view that's a very big equation because you have to look for an income stream in the future...I think politicians, they don't like that. I can see why, because they've got a fear attitude to it. But if you don't incentivise the person who's taking on their job for them, for the roads and street lights etc, they won't have the impetus to do it right.

(Park Operator 1)

Some park operators will buy back Park Homes from residents themselves. If it is an older Park Home this allows them the opportunity to remove it from the site and free up a new pitch for a more modern design.

There were a mixture of views as to whether the purchase of a Park Home could be considered an investment in the way mainstream housing is often seen. One of the park residents who participated in the research did not expect their home to rise in value commenting:

“No, I don't expect it to go up...it wasn't important to us...It's more important for us to stay in somewhere where we're happy.”

(Resident 1)

The other resident participant was more ambivalent:

Obviously, as they get older, they do depreciate in value, whereas bricks and mortar either increase or at least maintain the value, but of course, when you get to...old age, then capital investment is...one of the last

things you think about. The main thing is that you've got a home over your head, and it's your home, and it's going to last your lifetime. After that it doesn't really matter whether the homes appreciate or depreciate or not. In actual fact, on a good Park Home site like this, the value does in fact keep along with the inflation. The asking prices are a little above what we paid out initially for the home anyway...

(Resident 2)

One of the manufacturers acknowledged that Park Homes could sometimes depreciate and this was why this form of accommodation was more popular with people in later life⁴. One of the operators recognised that they were generally seen as a depreciating asset, though they argued that the continuation of this view allows it to become a self-fulfilling prophecy. As suggested by the resident above, several other participants suggested that their future value was very much dependent upon the park where they were sited and one operator also recognised the potential influence of demographic changes as well:

I've been selling them for fifteen years. I never, ever promised anyone that it would be worth more than they paid for it...I always said that the market would decide what it was worth at the time...Virtually every single home that I've sold is now worth more than I sold it for. If you get the development and the ethos right the value isn't a great problem. Looking back at the time now, certainly, they're going to live in a society with more older people proportionate to the number of people in the country. So, the demand for these by that very virtue is going to go up. So, you've got a limited supply, increased demand. I don't think you need to worry.

(Park Operator 1)

7.3 Perceptions of the Market for Park Homes in the UK and Scotland

It is difficult to develop an objective perspective on the market for Park Homes since there is no recording of sales by the Land Registry or the Registers of Scotland. There were a variety of views on the market for Park Homes among the research participants.

7.3.1 Awareness and Perceptions

There was a general consensus among the research participants that awareness of Park Homes among the general population is low. Many participants suggested that stories of rogue operators in the press had created a negative image in the minds of some prospective buyers:

I think any of us when we've been in this industry...all we think about is the rogue stories. But...95 percent of the parks I visit are actually very well run, very well liked and there are 250,000 residents in Park Homes throughout Great Britain and I think 97 percent of those residents are absolutely over the moon with it. I [formerly] managed parks...[and] I would walk around the parks and the residents would come out and thank me for selling them the home, they love living there...I think all of us manufacturers, park owners have tendency to talk about the rogue operators because it's what's interesting, but actually, overall, it's a very, very good option for people and we don't highlight that enough in the local press, in the national news, in local government.

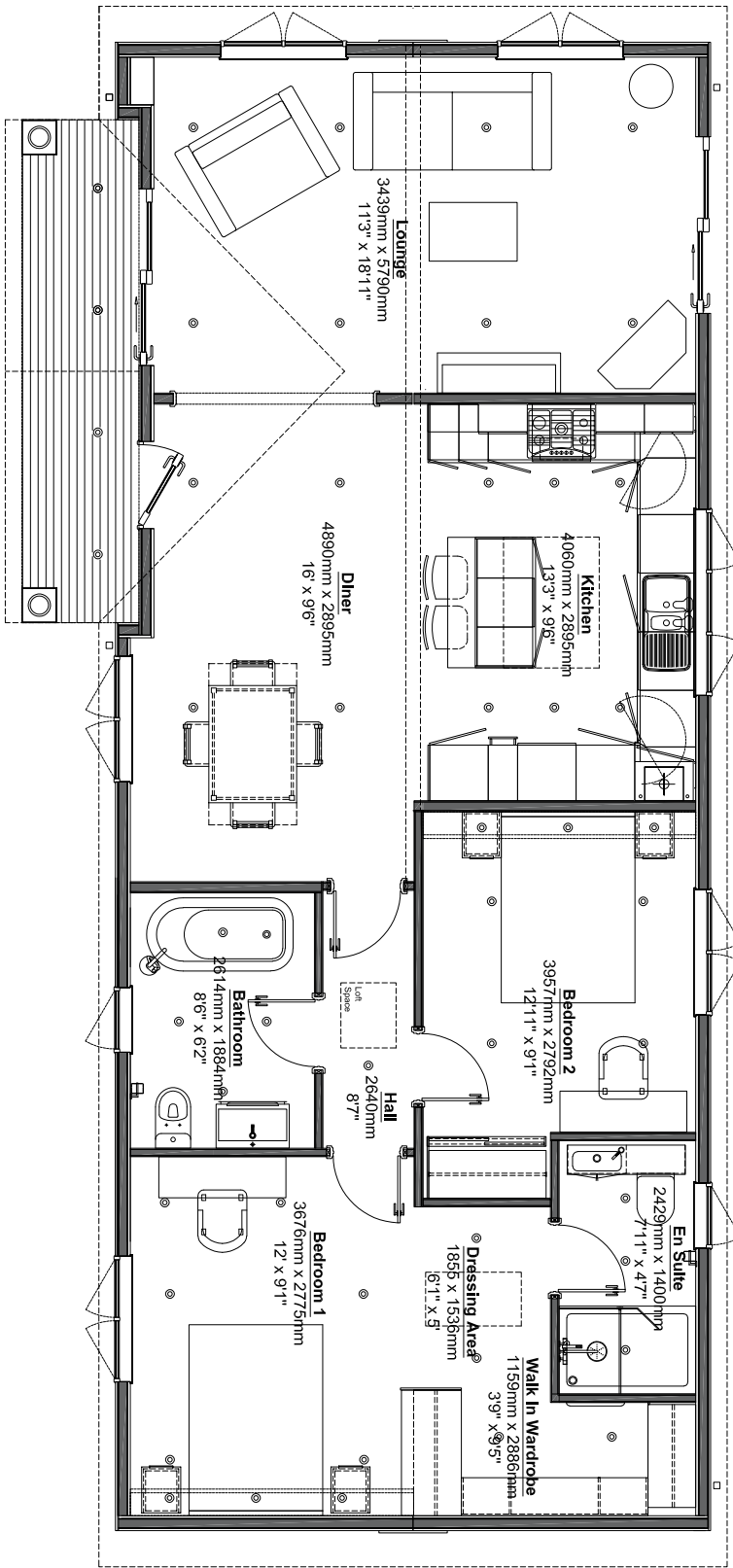
(Manufacturer 1)

It was also suggested that the legal definition of Park Homes as “caravans” could dissuade some people from considering the option and that there may also be some ethnic discrimination against operators if they come from a gypsy or traveller background.

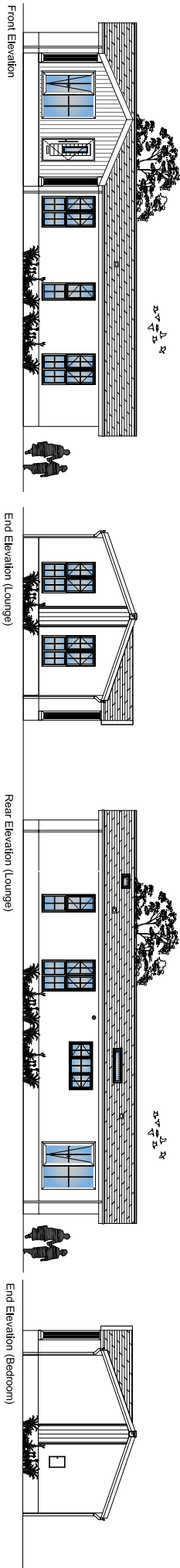
Some participants commented that awareness of Park Homes may be lower in Scotland than other parts of the UK. One participant suggested there may be a cultural issue around Park Homes in Scotland:

...the people that live on [Scottish park], are very offended by the fact that it's called a mobile home park.

4 This may be common across new build retirement homes more broadly (Bonsignore 2017).



Tingdene Park Homes: Addington Floor Plan



They feel it's almost derogatory to say that it's a mobile home park and they like to consider it as being a residential development, to the point that they don't call it [name], they call it...[a residential village] and this really is born out of the idea that they feel like they're second class citizens and I think that is born out of a lack of understanding within the community in general, of what really a mobile home park is all about. In England, it's not quite the same, the understanding of what a mobile home park is, is far greater and there's almost a pride in living on a mobile home park, that there isn't in Scotland.

(Park Operator 2)

Some participants reported that awareness of Park Homes is growing. One participant commented that there was now more knowledge of the concept outside of the traditional groups of people who used to be called “anoraks” and people who “didn’t have enough money for a house” (Park Operator 1). One of the planning authority professionals who participated suggested that it was increasingly easy for older people to find information about this option online.

7.3.2 Strength of the Market

There was generally consensus among operators and manufacturers that the market for Park Homes across the UK is currently strong, with one participant commenting that, “it’s a progressive market. We’ve been increasing production year on year for the last five or six years” (Manufacturer 2). According to one park operator the market was also strong for second-hand sales on their park. Another participant observed the growth in larger operators who owned multiple sites over the last ten years. It was suggested by several participants that the reason for the growth in the market may be driven by an increasing number of people looking to downsize and free up their equity:

...what we're finding now is Park Home sites are becoming increasingly popular for all aspects of the population...a lot of Park Home buyers can be fairly well off and they are perhaps looking to sell their family home and downsize to a Park Home and could use part of their pension plan. So, consequently Park Home sites, and Park Homes themselves, have become [a] much better quality standard in terms of the environment these Park Homes are in; the actual quality of the Park Homes themselves and the general amenity of the Park Home sites. And tend to be getting a bit bigger I would suggest as well.

(Planning Consultant)

Another participant commented on how they had observed that this decision to downsize had become associated with a slightly younger generation with popularity shifting from those in their mid to late sixties to individuals in their mid-fifties.

Views of the strength of the market were more varied among local authority professionals. Several did comment on how they were receiving increasing interest from holiday parks considering conversion or the addition of a residential element. Other local authorities were far less confident about the market in their area, commenting on how they were unaware of any proposals or even interest in Park Homes from developers. For some this was explained by developer disinterest in developing homes in their area more generally while others suggested that tourist accommodation could have a higher rate of return in their area and offer greater tax advantages as opposed to one-off sales. Poor climates were also cited as a reason why the Park Home market had not developed in some areas.

Several participants commented on how the Park Homes market in Scotland was weaker or less developed than in other areas of the UK, potentially linked to lower awareness of the concept, as described above. However, there was a recognition by some that the Scottish market may be weaker than other areas because the prices of mainstream housing are closer to the sales prices of Park Homes, reducing the potential for equity release. This may explain the sales experience of one of the operators:

We spent quite a lot of time showcasing things down south because our customer base in the new sales

was down south...So, these customers were paying what seems like incredible amounts of money to us. We couldn't get the locals to pay that normally. When they came up for sale second-hand, it's the locals that bought them. Now they've established they do pay good money as well.

(Park Operator 1)

It was suggested that the lack of previous Park Home development in Scotland may mean there are fresh opportunities:

I have just employed somebody...based in Glasgow to work for me in Scotland...to work the marketplace and to understand it a little bit more...So, we are trying to hit the ultimate Scottish market. Our focus for next year is to push that...there are probably more opportunities for the development of parks in Scotland because...they probably haven't been neutralised as much as they probably would have been in say, England or Wales...

(Manufacturer 2)

Some participants, including both the planning and developer side, did question the market for the development of completely new parks, suggesting that it was difficult to envisage this:

...you're not going to go and buy a plot of land and get planning consent as a mobile home park, where you could get planning consent for housing...because it's a lot more lucrative to put housing on, than it is...to put mobile homes on...there's a limited market in terms of planning for new mobile home parks

(Park Operator 2)

Based on these assumptions, another participant discussed the potential for land ownership by traditional housebuilders to explain the absence for any entirely new Park Home applications in their area. One planning officer questioned whether there was any particular niche regarding sites that Park Homes may be able to fulfil that mainstream housing developers could not, asking whether Park Homes may be a more suitable form of development on land with poorer ground conditions.

7.3.3 Market Drivers

There was generally consensus among the manufacturers and operators that the market for Park Homes is directly related to the mainstream housing market. Views on the relationship between Park Homes and the retirement housing market were slightly more mixed. One manufacturer clearly articulated the overlap and differences:

Park Homes generally don't offer care facilities and that's one thing that we make people aware of when we are working with parks, that these are not care options. Some parks do but that is very, very few. Most people who are buying a Park Home are the same people who would buy a McCarthy and Stone flat, a retirement flat or such, but instead of it being a flat where you're attached to your neighbours below you, above you: you are detached.

(Manufacturer 1)

However, another manufacturer made clear their company’s expansion away from Park Homes as an option for later life, looking to increasingly target their product at people lower down the age range.

Participants were agreed on the centrality of the park in determining the market for Park Homes, both new and second hand:

If it's a good site... if it's a good quality site, there's never a spare pitch on them. Never a spare pitch on them. Word gets around and again what we tend to find – just anecdotally speaking to clients – is that if it's a good site...then friends of friends want to join their friends on the site

(Planning Consultant)

In addition to the number and condition of other homes on the park, participants also identified the maintenance of the park, its operational reputation and the community spirit among other residents as key determinants of the local market. The location of the park and its proximity to a large city or even a nearby village or town was also generally seen as important.

While equity release has already been discussed as one of the drivers of the market, participants identified other reasons for recent Park Home sales. For some residents, Park Homes are simply a more affordable option and increasing house prices in some cities, such as Edinburgh, may have increased interest in this option. One of the operators spoke of how they think more re-sales are taking place of newer model Park Homes than those from twenty years ago in their parks, keeping better pace with the more general market and allowing people to move if they wished. One of the planning officers who participated explained that a market in (unlawful) residential occupation of holiday caravans had developed potentially due to weaknesses in the tourism market.

Perceived Attractions and Advantages of Park Home Living

Manufacturers, park operators, residents and local authority officers were all able to identify a number of potential advantages of Park Home living in retirement. These were related to two broad aspects of Park Home living: the Park Home and the wider environment.

7.3.4 The Park Home

As has been discussed, one of the primary perceived advantages of a Park Home purchase is the potential for people in or nearing retirement to move to a cheaper property and release their equity and this was recognised by residents, manufacturers and local government officers alike. However, the affordability advantage of Park Homes was not solely recognised as an opportunity to release capital. Some participants also acknowledged that buyers were attracted to purchasing a home which would otherwise be unaffordable due to its design, location or age:

...bungalows are dying out now, property developers have realised that you can put more property on two floors, than you can on one floor...so it's an opportunity to effectively buy a bungalow for cheaper than you can buy a house at the moment if you're struggling to get on that property ladder.

(Park Operator 2)

The so-called “downsizing” attraction was not only financial, with other participants commenting on how some Park Home buyers were living in “family houses that are just too big for them now” (Planning Consultant) and that this option may be easier to maintain, “I think the perception is it's a simpler form of accommodation without all of the burdens that come with owning a property” (DM6, PA6). One of the residents spoke of how the one-level nature of Park Homes meant that “there's a lot of saving in housework” (Resident 1). Several participants drew particular attention to the smaller gardens available with some Park Homes in this respect, commenting on how older people can often struggle to maintain larger outside spaces. Gardens were also discussed as an advantage for Park Home buyers in and of themselves, especially when compared to retirement housing options:

I think part of it [the advantage] is that the individual will have their own space. They still have their own garden...in sheltered accommodation, or whatever, you're still very much more – say, for instance a flat or something – you don't really have much of a garden. So, a lot of [buyers] it's one of the things that they still do...it gives people customs that they're used to...So, things haven't changed much for them. Whereas, you could potentially lose all that if you moved to a flat or something like that.

(Manufacturer 3)

Several participants, including some local government officers, recognised that part of the attraction of first-hand Park Homes was that they offered the opportunity to purchase a brand new home. The ability to alter the



Image provided by Richmond Lodge and Park Homes

designs of Park Homes was also seen as a major boon by some:

... unlike bricks and mortar, where you've got a set design, a set house, and that...you have to put up with what's there on paper, by ordering a Park Home, you can actually rearrange everything inside to your requirements, and that's the beauty of a Park Home...the second bedroom, although we could have had it fitted out with furniture, we decided not to. Instead, we decided that we'll have that as our study, so we put extra power-points in, extra windows in to give it light, and it's quite a sizable study...we think that's very important not only for us, but for other people who have retired and want to pursue...their indoor hobbies.

(Resident 1)

The bespoke nature of new Park Homes was also discussed in relation to meeting the needs of people with disabilities, both now and in the future. One manufacturer explained how features such as higher electric sockets, hoists, wet rooms and wider doorways could be included in the designs from the outset, with units meeting current needs and future proofed where prospective residents expect deterioration in their health. The energy efficiency of new Park Homes was also commented on by some participants as an advantage, with one drawing attention to how Park Homes are now constructed to a standard similar to mainstream building regulations.

7.3.5 The Wider Environment

One of the most widely discussed advantages of Park Home living was the potential to live in a community with people similar to oneself, both in terms of age profile and outlook:

...what people will report to me on a daily basis is the community you move in. When people buy a Park Home on a site, they're not just buying their home...they are buying the community. They're buying into the community spirit where people are looking out for each other. It's very friendly...They've made more friends in a mobile home park in twelve months than they made in their traditional bricks and mortar street in twelve years.

(Manufacturer 1)

As well as the social benefits within a park, some participants also commented on how some older people are attracted to Park Homes as an affordable method of moving closer to their existing family.

Participants also saw Park Home living as a good option from the perspective of safety and security, with some noting non-existent crime and the two residents both alluded to the safety advantages of living away from busy roads. Other participants commented on how the management of the parks, as well as the potential for equity release, could open up the opportunity to have a holiday home in another country for use in the winter months, in the knowledge that their Park Home is in a managed environment.

The scenic location of many parks was also identified as an attraction of Park Home living, with one resident commenting on the “network of paths throughout the estate, riverside walks as well as woodland walks, all within the estate, and we don't even have to cross a road to enjoy the facilities” (Resident 1). For several participants this linked to the holiday lifestyle that Park Homes can provide and how some people first learn of Park Homes through holiday caravanning:

There's undoubtedly...I think that desirability from the residents' point of view that you're retiring into a perpetual holiday by being on a holiday park. That is your life now, is that you are on holiday. You're living the holiday lifestyle.

(DM3, PA1)

The rural location of many parks was also discussed in relation to the potential for retirement to a Park Home to be quieter and more peaceful. In this regard several participants also commented on how children are often not allowed to reside on parks, providing a more relaxing environment. Several participants also drew attention to the space and privacy advantages of Park Homes over other options:

...you have to space [Park Homes] out six metres apart, from a spread of flame point of view. So, there's that...feeling a bit more space around the place. This solution wouldn't work in the city centre because obviously you need six metres apart. You are never going to be in terraced housing or something like that because, or even flats, because they think, 'Jam them in and pack them high.' Whereas, for this solution, you can't.

(Manufacturer 3)

7.4 Perceived Disadvantages of Park Home Living

In addition to the advantages explored above, participants also identified a number of disadvantages of Park Homes as an option in retirement. These have been grouped around three themes: construction; life on the park; and financial implications.

7.4.1 Construction

Several participants saw Park Homes as problematic in the way they are produced, “I think they're poorly constructed and they're not a suitable type of accommodation just because of the nature of them and the way

they're built.” (DM1, PA1). There were generally two implications of this view for participants: a weakened ability for Park Homes to protect people from the elements and provide sufficient warmth; and the inability to adapt them as residents' needs changed. These are discussed in turn below.

Ensuring Park Homes were warm enough was a primary concern for some participants because of the age range of the likely occupants:

I don't know how the modern Park Homes work, but certain examples in England have shown heating costs are quite high and obviously older people in general would have more of a heating need. I don't know whether the modern Park Homes compare well with new permanent homes. Or if the building regulations are the same or more relaxed in terms of the heating costs of a new Park Home compared to an affordable unit.

(PP2, PA3)

Some participants commented that for those splitting life between a Park Home and another property abroad in the winter months, they may only realise these perceived issues when they are no longer able to travel long distances. One planning officer discussed how they (incorrectly) thought that the homes would need to be replaced every ten years in line with their site agreement because of their poor construction.

Manufacturers and operators defended the ability to heat Park Homes. There was acknowledgement that older Park Homes do have issues around energy efficiency, but they also drew attention to how the standard of construction of Park Homes has improved dramatically in the last few decades and is relatively close to building regulations (as discussed in Section 3). One of the residents, who purchased their new home in the early 2000s, commented that they had added some further insulation to the roof but otherwise found the home economical to heat. One of the manufacturers acknowledged that the building standards are lower than building regulations, but that equalising them entirely would potentially affect the affordability benefits. There was agreement that the perception of needing to replace a caravan after a certain period is incorrect and a conflation with rules around holiday caravans, which are built to a considerably lower standard.

Aside from concerns around energy efficiency, several participants discussed their concern around the adaptability of Park Homes. The issues here were twofold. First, there were concerns that the nature of the construction rendered Park Homes difficult to adapt:

...ramping steps is horrendous. A lot of them are very high and built on stilts...Door widths within the properties ...Quite often we're asked to remove a bath and put a shower in. Well, we can't do that...I don't know that, structurally, that could be done.

(OT1, PA1)

Other occupational therapists and some planners commented on difficulties such as the perceived inability to move walls and fit grab rails externally.

The second concern was the inability to finance adaptations through government grants. OTs explained that unlike in England, where Disabled Facilities Grants are open to Park Home residents, grants for adaptations in Scotland are not available:

...some of these [cases] escalate to elected members...so, the local councillor, their MSP. So, each time, when it gets to myself, I've gone back to that elected member or to that MSP to say, “This is something that you need to address at a higher level.” Because it's within legislations and that's the reason we can't do anything about it. We try and find ways and means around it but we're restricted in terms of how much we can do from the budget that we have...

(OT3, PA1)

The OTs discussed the negative impact that this has on their clients, reducing their ability to leave their home and reducing their quality of life.

The adaptability of Park Homes was heavily disputed by manufacturers:

I would fully agree with their statement if it's a home that was maybe built before 1970s. Homes built prior to the 1970s weren't built as good as they are today...Any Park Home built after 1970, 1980s would absolutely be fine for most adaptations. The only issues I could see is just like some bungalows or some housing, it's not available because there's not the space...We have, and other companies have, a refurb section. We will often go to Park Homes and put in wet rooms, hoists, disabled equipment, anything. So I don't really agree with that statement that they can't be altered.

(Manufacturer 1)

Another manufacturer argued that it was probably easier to adapt a Park Home than a bricks and mortar dwelling. Both residents who participated in the study had replaced their original bath with a shower as their needs changed and reported that this was not a major challenge:

... we did it pretty quickly...we did that off our own bat and [using our] own capital...it was pretty straightforward, yeah. It's just the same as doing any alterations with brick and mortar. Yeah, no problem at all.

(Resident 1)

However, one of the manufacturers was in agreement regarding the inability for Park Home residents to access grants, not only related to adaptations but a variety of other benefits as well (see Section 7.4.3)

7.4.2 Life on the Park

Several participants, including manufacturers and developers, discussed poor management of some parks and the existence of rogue operators within the industry. There were four problematic areas identified: lack of full disclosure upon purchase; poor investment in, and management of, parks; the selling on of utilities; and the way that purchasing back Park Homes opens up opportunities for bad practice:

[there are] parks over the years that have been rundown, where there's been a complete lack of investment put into it. The roads are poor conditioned, the electrics, the infrastructure is poor where really, they've been siphoning all the money off..

(Park Operator 2)

I could [hypothetically] go and bully [a resident], to sell her home, turn her water off at night and turn her electric off and on and just be a bit nasty. But, one, my reputation is shot, and there's nothing to be gained from doing that [because] I don't sell homes on my own park. In an ideal world, park owners shouldn't be allowed to sell homes in their own park, only new ones. Then there's no incentives to bully someone to get a profit or a sale. That's where the bad habits come in.

(Park Operator 1)

Another participant commented that due to the nature of the tenure, which allows the land to be sold on, there is an uncertainty around the long term quality of the management provided. One of the manufacturers acknowledged that there is some poor practice in the industry but that it is rogue operators who get the media attention when the vast majority of park operators behave responsibly. It was also argued that poor park operators have been forced out of the industry in recent years.

The location and proximity to services was also cited as a disadvantage by some participants. One commented that Park Homes “tend to come forward in suboptimal areas in terms of access to services” (PP6, PA7), whilst

another said that residents may struggle to access amenities after they give up driving. It was also suggested that some parks do not provide services or spaces where people could meet and interact and which would engender a strong sense of community.

One of the park operators discussed how what they saw as particularly militant residents who complain about what they believe is poor management of parks can cause ructions between Park Home owners:

...highly aggressive militant people living on mobile home parks, making life miserable for people and it gets to the point that it isn't the nice environment that [other residents] thought it would be and they want to get out...you get certain people that create a climate of unrest or a climate of fear in the park to give them prominence and give them power to show that they're doing something...in some parks, it's quite dominant and the new people that are moving on, just don't want it and you sometimes wonder if they suffer in silence and then decide just to move a few years later and go, no I don't like it here, I'll move on

(Park Operator 2)

There were also perceived disadvantages true of retirement housing more broadly. One of the park operators acknowledged the age segregated environment might not be to everyone's taste and a local government officer commented similarly on whether some people may struggle when their neighbours pass away.

Another participant identified the common method of heating Park Homes via liquid petroleum gas (LPG) as potentially challenging for older people, especially for those with dementia, whilst one interviewee suggested that the exposed locations of parks and what they thought may be a lower standard of water supply raised the potential for them to be cut off in extreme weather.

7.4.3 Financial Implications

Several participants drew attention to disadvantages of Park Home living which had a financial dimension. The most fundamental issue was that it is not possible to take out a mortgage on a Park Home, as stated above, although participants did make clear that some special loans are available. Other participants drew attention to the ongoing pitch fees and the 10 per cent commission payable to the park owner on sale of the home and questioned whether buyers were fully aware of this at the outset.

The inability to access grants for adaptations was discussed above, but participants drew attention to other benefits, such as fuel subsidies, for which Park Home residents are ineligible, with one commenting, “it's like they don't exist. ...I feel sometimes that Park Homes are considered an underclass of housing” (Manufacturer 1). Related to the provision of utilities, there is also the potential disadvantage of not being able to switch provider and take advantage of lower tariffs.

...on mobile home parks, one of the big issues is mainly with water and electricity, there's no direct supply and that's actually due to the historic nature of mobile home parks that they came up as caravan parks, which had a mains supply to them and it was all metering and we are the electricity and water reseller on the vast majority of our parks...the Ofgem and Ofwat or Scottish Water rules...are completely different for reselling than they are for supply.

(Park Operator 2)

There was also a perception among some participants that a Park Home may be difficult to sell on because of the smaller pool of potential buyers compared to a bricks and mortar dwelling:

...there's the consideration of the resale afterwards. Because you are not selling a bricks and mortar home. You are probably limiting who you will sell to. The chances are that your children aren't going to want to live in or take it on. That's from the point of a view of a park, that's why they do quite well. They'll generally be the ones who will buy the home back off that person. That's how a lot of parks do it. Obviously, they'll get

it for a certain price because there aren't that many takers for the home...Then they'll redevelop. As I said, they'll either ship the home off, put a new one on and start again...Probably that's the biggest negative on the whole thing. Just the fact that it's not bricks and mortar.

(Manufacturer 3)

This participant also suggested that resale might be a particular issue on parks which still had spare pitches remaining, similar to the build out of a new traditional housing estate.

7.5 Advantages and Disadvantages of Park Homes for Local Authorities

In addition to identifying advantages and disadvantages of Park Homes for residents, several participants also drew attention to the potential benefits for local authorities. The potential for park developments to provide new homes with accessibility benefits in a timely manner were discussed. Several also spoke of how they could create downsizing opportunities for older people while also releasing larger family homes:

...properly managed Park Home sites could have a huge impact on Scottish housing. Very cheaply and very quickly. So, see if I was to build another Park Homes...that brings...groups of retired people, either single or as a couple. It brings that easy access. It leaves the bigger houses for people that need them.

(Park Operator 1)

Some participants also raised the potential benefits in the delivery of care to people living in Park Homes because of economies of scale:

...obviously, there's a lot of elderly people here and a lot of them do have care from the local authority, and it actually fits in pretty well...that helps the community, the care system...we're all in a nucleus of people, and the carers don't have the amount of travelling to do from one person to the other...We're all together, and it's easier for the care people to manage there.

(Resident 1)

Another participant drew attention to how, from a financial perspective, local authorities would receive council tax income from new Park Home residents but would not be responsible for the roads or street lighting within the development, unlike a bricks and mortar estate. One of the park operators also pointed out a potential disadvantage for local authorities, commenting on how councillors would understandably be concerned that the park would be poorly managed and cause issues for residents.

7.6 Leaving a Park

As noted earlier, there is a critical lack of research which has explored why residents leave Park Homes. Participants offered a variety of explanations. Both park operators reported that the most common reason for empty Park Homes is that the owner has passed away. Destinations cited for those leaving included sheltered housing and care homes. One participant commented on how some people had left their park only to return at a later point. One of the residents and one of the park operators acknowledged that some people leave because of disputes either with other residents or the park operator. Several participants commented on how residents left to move closer to their families, especially after the death of a spouse.

8 Planning Policies and Park Homes

8.1 Introduction

Planning authorities may take different views on the development of Park Homes. This section presents an analysis of planning policies throughout Scotland. The first subsection consider policies which were in force at the time of the research. The second subsection explores policies in proposed LDPs which had not yet been adopted. The third section explores the perspectives of planning officers on planning policies.

8.2 Analysis of Existing Policies

The analysis found that 22 of the 34 planning authorities in Scotland had no policy which specifically related to the general future development of Park Homes (see Figure 8.1)⁵. The remaining 12 planning authorities had policies which were unsupportive of Park Home developments (see Appendix 1). These were divided into two categories. Nine planning authorities were found to have a policy which was directly unsupportive of Park Home development. These were where the policy articulated clear opposition, such as in the case of Moray's Policy H10 on residential caravans and sites:

The Council will not permit caravans to become permanent residences, except
a) In emergency situations requiring urgent re-housing for a temporary period, or
b) Where a temporary consent is required in relation to the construction of a house for which planning consent has been granted

(Moray Council, 2015, p32)

The remaining three were considered to have de facto unsupportive policies. This was where a specific policy on general Park Home development was supportive in cases which would actually rule out sites in the way they are being considered in this study. This was where they were thought to be temporarily acceptable in relation to supporting the construction of a permanent dwelling, supporting a business or housing agricultural workers. One such example is Aberdeen City's supplementary planning guidance on temporary buildings:

'Portable buildings'...are typically used for short-term accommodation requirements...These are increasingly used at industrial premises. The Council consider that in most circumstances three years is a reasonable timescale for any permanent accommodation solution to be achieved, and therefore typically that will be the maximum initial period of time granted for portable buildings...Temporary buildings for residential use will only be considered appropriate when required to accommodate temporary workers for construction of a major infrastructure project.

(Aberdeen City Council, 2017, p3-4)

Five of the 12 planning authorities provide a justification for their opposition to Park Home developments. There are three rationales provided: the harsh climate of the local area; the construction/design of Park Homes; and the visual impact of such developments. Each of these were cited three times across the five planning authorities. The Western Isles combines all three justifications in its Supplementary Planning Guidance on Caravans and Temporary Buildings:

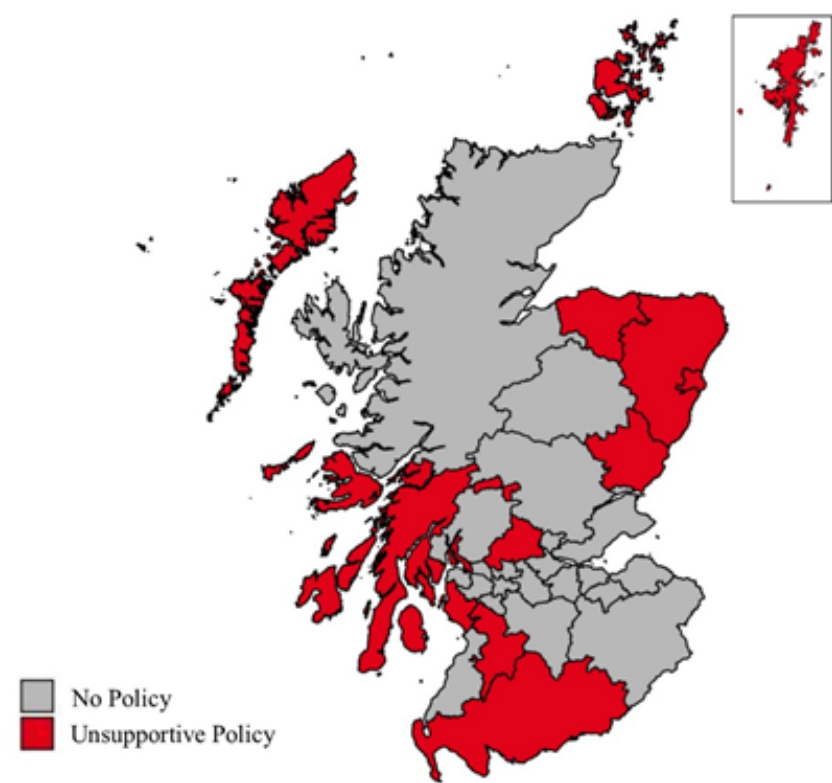
The design, materials, colour and finishes of residential caravans and mobile homes limit their potential for integration into open landscapes and due to the climate and exposure in the Outer Hebrides they typically deteriorate faster than their lifespan. This can detract from public and neighbour amenity and unless effectively managed, can lead to adverse landscape and visual impacts and to environmental dereliction.

(Comhairle nan Eilean Siar, 2012, p3)

Two planning authorities are notable for discussing Park Homes in relation to affordable or low cost housing. These are Midlothian and Moray. However, they have distinctively different outlooks. Midlothian does not have a policy on future development of Park Homes but instead sets out its intention to protect its existing sites in policy DEV 4 of its LDP:

⁵ In Highland no policy was identified which met the criteria in either the Highland-Wide LDP or any of the plans for areas within Highland.

Figure 8.1 Map of Planning Authorities to show presence of specific policy on Park Home Development



Residential Park Homes provide an affordable alternative lifestyle choice for a significant number of households in Midlothian, principally in the A701 Corridor at Nivensknowe Park and Pentland Park. The Council supports the continued use of these residential Park Homes sites for their current purpose.

Development proposals that would prejudice the continued use of Nivensknowe Park and Pentland Park for the siting and management of residential Park Homes will not be permitted. The Council will seek the long-term maintenance and enhancement of these sites for their current use as affordable homes.

(Midlothian Council, 2017, p14)

Moray on the other hand not only seeks to block all future development but actually encourages the redevelopment of its existing parks into regular housing:

Despite improvements in construction and design, caravans (and Park Homes/chalets which are still classed as “caravans”) are not regarded as providing suitable full time living accommodation. There continues to be a large number of caravans in Moray in residential use, and it is an objective to reduce the dependency on this for low cost housing. The policy therefore places an embargo on the creation of any new sites, and also encourages the development of existing residential sites for housing developments.

(Moray Council, 2015, p32)

8.3 Analysis of Proposed Policies

Ten planning authorities had a proposed plan currently accessible at the time the research was conducted and Highland had some of its draft documents available. (See Appendix 1). Seven of these 11 planning authorities had no policy which specifically related to the general future development of Park Homes. Of the four which did have such a policy two were classified as directly unsupportive; one was considered de facto unsupportive; and one was recognised as supportive with conditions. The latter planning authority was Perth and Kinross which had developed a new policy entitled “Caravan Sites, Chalets and Timeshare Developments” which states:

Proposals for new chalets or timeshare/fractional ownership developments which are intended as permanent residences will be required to be built to the same standards, particularly in terms of drainage and utility services, and make the same developer contributions as permanent housing developments. Proposals for such developments which are outwith a settlement boundary will be required to comply with Policy 19: Housing in the Countryside.

(Perth and Kinross, 2017, p28)

While the policy refers directly to chalets and timeshare developments, Perth & Kinross confirmed that the focus of the policy is on the permanent use of a development rather than its technical categorisation as a chalet, house or caravan. The policy therefore potentially incorporates Park Homes. Perth & Kinross stated that the policy may need to be tested through applications. No further details regarding “same standards” are provided in the policy.

If interpreted to mean construction standards then it may actually be considered a de facto prohibitive policy, as it’s unlikely that a Park Home could ever be built to exactly the same level as a bricks and mortar dwelling. Nevertheless, it represents the only policy which could be found which expresses that Park Home developments may generally be acceptable under certain conditions not related to rural businesses and dwelling construction.

The difference between current plans and proposed plans was also considered for the relevant 11 local authorities. There appeared to be no overall trend, with the status quo generally being retained (Table 8.1).

Table 8.1

Difference between Current and Proposed Plans	Count
No Policy to No Policy	5 (+ parts of Highland)
Unsupportive to Unsupportive	3
Unsupportive to No Policy	1 (may follow in SPG)
No Policy to Supportive with conditions	1

8.4 Planning Officer Perspectives on Policies

Planning officers at authorities without a specific policy on Park Homes suggested that it was not a live issue and that applications would be judged against other policies, such as those related to housing:

In terms of new ones though, I suppose our policies aren’t ideal. It would be a bit of a one off for us. Our policies aren’t written with more of these in mind. It would be a case of more general policies to do with protecting the character and amenity of the area and [other] various issues

(PP8, PA7)

The rationales for unsupportive policies provided by participants were similar to those discussed above:

...I think that all links back into that argument about design and [Scottish Planning Policy’s (SPP)] direction on six qualities of a successful place...SPP links into the need for development to be distinctive through complimenting local features, adaptable, resource-efficient, including the use durable materials. So, I mean, you could pick out Park Homes would be resource-efficient, possibly they could be adaptable, but I’m not sure how they could compliment local features. I don’t know enough about the designs and that issue of durable materials.

(PP3, PA4)

9 Lawful Use and Acquiring Planning Permission

Another participant explained that for their policy, “the rule here is that caravans belong in caravan parks and are seen really as holiday units rather than permanent homes.” (DM7, PA5).

One planner commented that they did not think this was the first time their unsupportive policy had been adopted in a plan and another participant suggested that their policy may actually be around thirty years old and based on experiences of Park Homes from the 1950s and 60s:

The policy has been in place, to my knowledge, since the late 1980s [here]. So, obviously, it's quite an old policy...we've never actually had any objections to that policy in terms of the various iterations of the local plan and the various sort of statutory consultation things that have gone on there. So, it's one that has just sort of basically continued on since then... I think that policy from the late '80s sort of possibly may well have actually come about because of [one] site...I think probably it's one of the earlier ones, and I think there was an issue, I think, in terms of the condition of the caravans...by the time they were sort of 20 or 30 years old, by that time, and were obviously deemed not really being suitable for people to live in permanently. (PP4, PA5)

Some participants at planning authorities with unsupportive policies made clear that it was still possible that Park Home developments would be accepted. The most obvious possibility would be if an application was referred to a planning committee where “the councillors will quite often look at the bigger picture and set aside policies if there's good reason to do so” (DM5, PA4). The vast majority of planning officer participants had no strong sense of what elected members' views of Park Homes might be but planners at one authority suggested that they would probably be reluctant to support such developments.

It was also suggested that a proposal might be accepted if, despite one prohibitive policy, it could meet another policy. Two examples of such policies were provided. First, the policy of encouraging the development of continuing care retirement facilities. One planner explained how a prospective Park Home development providing care may fall under this kind of policy rather than their policy which was unsupportive of Park Homes development. Secondly, the policy of meeting housing needs for older people. One planner suggested that in their area the case might be made that the development was contributing to accommodation for an ageing population, fulfilling a different planning policy goal, even if Park Home developments were discouraged.



Image taken in Willow View Park, Whimble, Devon provided by Brixton HPA

9.1 Introduction

This section considers the process by which the siting of Park Homes on land can be considered lawful in planning terms. It is divided into two subsections. The first primarily sets out the five broad ways that sites can be considered lawful for Park Homes from a planning perspective, drawing on the interview and focus group data, as well as relevant documentation. It also presents five case studies of Park Home developments and details their attempts to gain recognition of a lawful use or planning permission. The second subsection explores research participants' experiences of the planning system.

9.2 Lawful Use of Land for Park Homes

In planning terms, Park Homes are considered residential caravans. In addition to permitted development in limited circumstances (see The Town and Country Planning (General Permitted Development) (Scotland) Order 1992), this study has identified five broad ways in which land can be considered to have a lawful use for siting residential caravans in planning terms. These are discussed in turn below. This is followed by some brief consideration of temporary permissions, planning enforcement and licensing.

9.2.1 Historical Approval

Perhaps the most obvious way in which land can be considered to have a lawful use for residential caravans is for it to have been previously provided with planning permission. However, it may not always be clear that this permission exists. There was a sense by some participants that planning permissions from several decades ago were vaguely worded regarding the occupancy conditions of the caravans approved.

The method by which the planning status of land can be established is through a 'Certificate of Lawful Use or Development' (CLUD). The use of these is set out in Section 150-153 of the Town and Country Planning (Scotland) Act 1997. Applications can be made for a use or operational development which has taken place (under Section 150(1)) or proposed (under Section 151(1) of the Act). They can also be used to determine the lawfulness of compliance with planning conditions. Guidance on the certificates is provided in Annex F of Planning Circular 10/2009. There are several notable features of the issuance of CLUDs:

- The onus of proof is on the applicant and their evidence does not need to be corroborated independently.
- The decision is a legal one, based on matters of “evidential fact and law” and is taken on the balance of probability, outside of planning policies (Scottish Government, 2009)
- The planning authority cannot refuse the application if it does not have any evidence which is contradictory to the applicant's or makes their “version of events less probable” (ibid.)
- Certificates can be required when applying for a caravan site license

One of the planning officers who participated in the study summarised their experiences of CLUDs:

The test for a certificate of lawfulness is relatively low compared to a matter of law that's determined in a court. So the test is the balance of probability. So if it appeared, on the balance of probability, that there had been a planning permission at that site, however many decades ago with no condition referring to occupancy on it and that in the intervening period that hasn't been abandoned or changed use at all for any substantial period of time, then you really have no option but to issue that certificate of lawfulness. (DM3, PA1)

The reference to the term “abandonment” can be critical here. Whilst there may indeed be a historical planning permission, it can be determined that the use has been abandoned in the interim. It is important to note that this concept has arisen from common law rather than statutes. It holds that for a use to be abandoned there must have been an intention to do so and it does not occur simply through lack of use (Dumfries & Galloway, 2018). One participant described their experience:

I have a site [where] the client...managed to convince...the council through a Certificate of Lawfulness application that the original planning permission from the '70s was so vague and ambiguous, that the council couldn't withhold the certificate which would allow the client to use the site for residential purposes because on the balance of probability, the planning permission, you could use it for holiday or residential use. So, we have used that before...perhaps a holiday site is still operating under, but the old planning permission is so vague that if another person acquired the site, it could be that they could change from holiday to residential use without the need for a further planning permission...

(Planning Consultant)

If the applicant is successful in their application for a CLUD, this provides them with legal recognition for the use or development of the land. See Case Study 1 for an example.



Image provided by Tingdene Park Homes

Case Study 1 - Dinwoodie Lodge Caravan Park

Planning Authority: Dumfries and Galloway

Period Concerned: 2015-2018

In 2015 a retrospective planning application was received for the formation of hardstanding for the siting of 11 static caravans and associated road and engineering works. This took place after Dumfries and Galloway had expressed concern when some ground works had commenced without permission. The site had historically been used for touring caravans and camping over a number of decades. Planning permission was granted in 2016 with a number of conditions relating to planting, car parking and visibility areas. However, the critical condition was the stipulation that “none of the caravans...shall be occupied as the sole or main residence of the occupant and they shall be used for holiday use only”. The reason provided was, “to accord with the council's policy on tourist accommodation which includes a presumption against use as permanent residence”.

In 2016 an appeal was submitted in respect of the holiday occupation condition. The appellant argued that the condition did not meet the necessary tests as it did not relate to the development which had been permitted – the creation of the bases – and instead related to the use of the land, which it argued already existed and is lawful. Later in 2016 the Local Review Body decided to uphold the original decision and that the condition should remain, arguing that the disputed condition had met the necessary tests for planning conditions and was reasonably related to the development proposed.

In 2017 Dumfries and Galloway received an application for a Certificate of Lawful Use for use of the land as a caravan site without occupancy conditions. In 2018 the case officer decided that based on the available evidence planning permission was granted in 1961 for use of the site as a caravan park without any occupancy conditions. The case officer further decided that this use had not been abandoned. This was based on the fact that whilst the site had fallen into disuse or little use for a period, there was no evidence of an alternative intervening use and that the intentions of the owner for it to remain a caravan site were clear from licensing records. It was therefore determined that the certificate be issued.

Sources: Dumfries & Galloway Council, 2016a, 2018; EJ Planning Ltd, 2016; Meahan, 2016.

9.2.2 Continuous Use

The use of land can be considered lawful if it has been used in that way for at least 10 years continuously. After this period has passed the use becomes immune from planning enforcement. Establishing legal recognition of this use is completed through application for a CLUD in the same way as described above. It is important to note that the use must apply to the same area of land continuously. For some planners this created confusion:

One of the difficulties arising - going back to the certificate of lawfulness as well - is if someone just chooses to occupy a caravan for a period of ten years and they can then demonstrate that they've done that, then again, they can apply for lawfulness and that again raises the issue of whether it's a dwelling house or whether it's a caravan, what it actually is.

(DM3, PA1)

It is important to note that it is not necessary for the use to have been lawful in licensing terms for the period of ten years. See Case Study 2 for an example of this kind.

Case Study 2 - Barry Downs Holiday Park

Planning Authority: Angus

Period Concerned: 2011-2017

In 2011 Angus received an application for the extension of an existing caravan park by up to 92 static caravans onto an adjacent site which contained timber huts. The application, decided by committee due to its size, was approved with a variety of conditions relating to access, drainage, sewage, vegetation, layout and lighting in 2012. However, the permission included a condition that the site shall only be used for holiday accommodation, specifying that “No caravan or other structure shall be occupied during the period of 1st February to 28th February in any given year or for any alternative period not less than four weeks in duration that may first be approved in writing by the Planning Authority.”. The permission explained that this was because “permanent residential accommodation on this site would not be compatible with the Council’s policies for housing in the countryside and would give rise to different impacts on infrastructure”. However, this planning permission was never officially implemented (by informing the planning authority) but caravans were installed on the site.

In 2013 an appeal against the occupancy condition was dismissed. The appellant had argued that the condition was unreasonable because there was no similar restriction on the existing caravan site and that there would be a loss of revenue to the holiday park and the local economy. The appellant instead suggested that permanent occupancy still be restricted, but without a period of non-occupancy, with the operator instead keeping a register of occupants’ permanent addresses. These arguments were rejected on the grounds that the occupancy would be difficult to monitor and enforce without a defined period of non-occupancy and that any lost revenue should be weighed against the need for monitoring.

In 2014 an application was submitted for a Certificate of Lawful Use for an existing Class 9 residential use. The applicant submitted evidence which sought to demonstrate that the (now removed) timber huts previously on the site had been in continuous residential use from 1968 until they were progressively replaced by residential caravans (Park Homes) which became occupants’ primary residence. The case officer agreed that some of the huts had previously had a Class 9 use. However, they argued that these did not cover the entire area relating to the application. They also argued that the siting of caravans represented an intensification of the use of the site and a material change in use, demonstrating that there had not been a continuous use for ten years. The application was rejected in 2015.

An appeal to this decision was rejected later in 2015. The appellant argued that as the Park Homes which replaced the timber huts were occupied permanently there was a continuation of the established residential use. The appeal was dismissed as it was decided that the Park Homes installed were caravans and therefore do not fall under a Class 9 use, and there was therefore no continuous residential use for the ten years preceding the application.

Later in 2015, an application was submitted (after being sought by the planning authority) for a retrospective change of use to principal or sole residence. The site now contained over 50 caravans. The application was refused in 2016 on the grounds that, “it seeks to establish a large-scale residential development in a countryside location and as it has not been demonstrated that occupants of the site would not experience adverse amenity impacts by virtue of the sites proximity to intensive livestock



buildings.” Furthermore, it was argued that a policy directly unsupportive of residential caravan developments within the Proposed Angus Local Development Plan of that time should be given weight as a material consideration.

A second application for a Certificate of Lawful Use was submitted in 2016, arguing that some of the huts which previously occupied the site were actually caravans that were timber clad, providing evidence of chassis and wheels displayed during demolition. They therefore argued that the use did not change when they were replaced with residential caravans. The application was refused by the planning authority, who argued that even though some of the huts may have been caravans, “The increase in density of the development, the loss of the undeveloped areas and the replacement of the huts with caravans has resulted in a material change in the character of the site and so a material change in its use.”. It was also argued that the huts did not cover the entire area relating to the application.

Finally, in 2017, the decision to refuse the second application for a Certificate of Lawful Use was appealed. The Reporter was persuaded that: half or more of the former huts were actually caravans and “shared the essential characteristics of Park Homes”; “occupation of at least some of the huts continued up to 2012 when they were progressively replaced by Park Homes.”; and “the progressive replacement of the huts (half or more of which were caravans) took place without an interruption in the use of the land”. The planning authority’s argument that the replacement of huts and intensification of use amounted to a material change was rejected. However, the reporter did agree that the continuous use only applied to part of the site and as such the certificate was issued for this area only. The other part of the site which contained caravans was therefore deemed unlawful. It is also notable that the Reporter acknowledged that, whilst the site had not benefitted from a residential license during the relevant period and was therefore unlawful in the wider sense of the word, this is not of consideration in determining lawful use in planning terms.

Sources: Angus Council, 2012, 2015, 2016a, 2016b; Edwards, 2013; Hickman, 2015; Smith, 2017.

9.2.3 Converting from Holiday to Residential

Sites which do not have either historical approval or ten years or more use as a site for residential caravans will need to apply for planning permission. Many residential sites have developed having previously been parks for holiday use, either for static caravans or touring caravans. Park operators might apply to planning for a change of use from holiday to residential or they may seek the removal of a condition for a previous permission which limited occupancy. Historically this may have mandated that the entire park close for a period of each year or, more commonly in recent times, that units would not be continually occupied over a certain number of weeks.

There appear to be different opinions among planners as to how conversions from holiday use to residential use should be treated, focussing on whether this now represents a Class 9 use of the land. One participant described how previous changes of use had been considered:

That then poses difficulties because again that would be making it a house, making it a Class 9 unit and with that as well, there’s requirements for developer obligations...we need to make sure that the impact of that are off-set...contributions for education to ensure school roll, there’s capacity in the school, same for healthcare, same for provision of sports and recreation.

(DM5, PA4)

This planning officer recalled how design and layout can also be an issue in conversions:

...the roads were maybe narrower, and they weren’t street-lit and obviously the temporary unit doesn’t have its own garden ground. When it becomes a permanent dwelling, it then needs to be properly serviced, both in terms of drainage and roads and parking and street lighting and pedestrian access, it needs to have its own garden ground and curtilage. We actually have one where the cost of all these things, the developer obligations, to get the road up to standard and so on is...is just making it all totally unviable for them.

(DM5, PA4)

The experiences of another participant appeared to be consistent with this view:

...if the planning policy for normal mainstream residential development doesn’t fit the site that the holiday caravan site is on, then they will just point-blank refuse to entertain the concept of Park Home sites in that particular area.

(Planning Consultant)

However, Case Study 3 (and Case Study 5, to some extent) shows how conversions can be treated quite differently by other planning authorities.



Image provided by Richmond Lodge and Park Homes

Case Study 3 - Cairnsmill Caravan Park

Planning Authority: Fife

Period Concerned: 2007-2010

In 2007 Cairnsmill Caravan Park was made up of 170 static mobile homes, 72 touring caravan sites and 12 residential caravans. An application was submitted for the change of use of six of the static holiday homes to residential and provision for two parking spaces. The application was approved on the basis of: the breakdown and numbers involved and the unproblematic impact on the tourist accommodation; that there would be no detriment to residential amenity; and that “the residential units would be considered to be compatible with the surrounding land uses”. In addition to conditions concerning pitches, roadways, planting and landscaping, a note to the applicant was included which stated, “For the avoidance of doubt the residential mobile homes approved have no permitted development rights under the provision of the Town and Country Planning (General Permitted Development) (Scotland) Order 1992 (or any order revoking and re-enacting that order). Therefore no development can be undertaken without the prior consent of this Planning Authority unless otherwise agreed in writing”.

A second application was submitted in 2009, for a change of use of four holiday static pitches to residential units. The decision was referred to committee on this occasion due to the objection received by Cameron Community Council, which argued that the “application is a means to circumvent local and structure plans for housing development”. It was determined that the application should not be assessed under the planning authority’s policies which relate to housing development in the countryside because it does not relate to an undeveloped countryside location, instead taking place within an established caravan park. It was decided that the loss of four holiday pitches would be acceptable with regard to impact on employment and tourism. It was also considered that there was to be no detrimental impact on the character of the park, given the similarity in appearance to the other units on the site, and that there would be minimal impact on road use.

The decision regarding residential amenity and garden ground is especially interesting. The report notes the standard plot ratio, garden space requirements and privacy expectations but then determines that, “In this case it is considered that since the units are located within a Caravan Park that the guidelines are not relevant in this instance. The nature of Caravan sites is that units are built in close proximity to each other and as such overlooking and overshadowing onto any adjacent properties already exists.”.

Whilst the education service was not consulted due to the application relating to less than 10 units, there was consultation on affordable housing. The report notes that whilst the housing service originally recommended “a financial contribution of £30,000 in lieu of on site provision” it was later decided that “this application does not constitute development [and] that there would be no requirement for affordable housing on this site.” Planning permission for the change of use was granted in 2010.

Sources: Fife Council, 2010; Roberts, 2007; Illingworth, 2010.

9.2.4 Expanding an Existing Park

Existing operators of residential caravan sites may also apply for permission to expand the number of Park Homes on their site. Case Study 4 provides an example of one such expansion, which again draws attention to the decision as to whether to treat residential caravans as Class 9 dwellings or caravans.

Case Study 4 - Annsmuir Caravan Park

Planning Authority: Fife

Period Concerned: 2009-2011

Fife received a planning application for the restructuring of Annsmuir Caravan Park in 2009. At the time the park had 107 pitches, broken down into 41 residential, 36 holiday statics and 30 touring. The proposal was to increase the total to 121 units, broken down as 49 residential and 72 holiday static, increasing the residential by 8, doubling the holiday static caravans and removing all the touring pitches. The application was seeking to formalise the current situation, which did not have a clear planning history, and upgrade the site to modern standards, including a new layout and new and replacement mobile homes. The applicant argued that increasing the number of residential plots would allow investment in the residential amenity.

The planning report begins by noting that, “the existing and proposed increase in the full time residential units part of the application falls to be considered under housing related policies while the holiday related aspects fall under tourist related policies”. It also acknowledges that relevant plans do not encourage this kind of residential development and states that if the normal residential amenity policies were applied the application would be substandard. However, it goes on to argue that, “while residential development of the type proposed should not be encouraged for reasons of residential amenity, there is a demand for this type of accommodation and given that there is a substantial established full time residential use on site a further 8 units could prove difficult to refuse.”.

The application was approved in 2011 with conditions relating to topics which included passing places, planting and land contamination and remediation. However, three conditions are especially notable:

- For the residential element, provision of private gardens, “window to window privacy” and car parking for each unit, but with acknowledgement that this had the potential to be lower than the standard normally required of residential development
- The provision of amenity space(s) equal to at least 10% of the area set out for both residential and holiday plots for residential amenity and to ensure open space(s).
- That the units on the site were to be considered caravans under the 1960 Act and do not have Class 9 residential status, justified due to the development’s inability to meet policy expectations regarding location and residential standards. The report makes clear that this therefore eliminates the need for affordable housing and education contributions.

Source: Fife Council, 2011; Stirling, 2011.

9.2.5 New Development

It is at least hypothetically possible that a planning application might be submitted for the development of a site which is not being used as a residential or holiday caravanning park or adjacent to one. However, this study could find no examples of this taking place in Scotland in recent decades. The closest example that could be found is described in Case Study 5, where a site which had historically been used for touring caravans, but which was no longer in use, was granted planning permission for residential caravans. One participant described a new development in England which took place on a brownfield site in a town centre and suggested

it may be easier to gain permission when in an urban area.

There was generally agreement among planners, at least where there is no prohibitive planning policy, that completely new development for residential caravans would be treated in the same way as mainstream housing:

I think there is a crucial difference here between effectively a change of use planning application and for a brand-new Park Homes development proposal. I think we would treat a brand-new Park Homes development like we would treat a mainstream planning application. Then we get into the detail of where these are actually proposed and because we would treat it as a mainstream housing application then we would want it on the allocated site...So, if a Park Homes developer approached us and said, "Where can I put my Park Homes?" Then we would direct them to the sites in our area local development plans zone for housing. So, those as you might imagine are within or on the edge of an existing town or village.

(PP2, PA3)

However, some participants did draw attention to how a new development would not necessarily need to provide affordable housing or make education contributions if it was considered retirement housing. One participant recalled how they had persuaded a local authority in England that the Park Homes could be considered affordable housing in their own right.

Case Study 5 - Spindrift Park Homes

Planning Authority: Highland

Period Concerned: 2009-2010

In 2009 a planning application was submitted to Highland for 15 residential caravans (reduced to 14 in an amended layout) on a former touring caravan site in the open countryside adjacent to a group of houses. The site had previously enjoyed provision for up to 16 larger static caravans although it was thought that due to a condition that these were removed each winter that it was only used for touring caravans. In addition, permission for residential redevelopment of the site with permanent dwellings had previously been approved but not implemented.

The planning report argues that the principle of redeveloping the site for residential use had already been accepted due to the previous permissions. Whilst it is admitted that the visual amenity impact may differ, it acknowledges the previous provision for static caravans and that any new consideration in this regard is therefore limited to the winter months. Considerable screening of the site by existing woodland is also noted.

The report recounts how a previously prohibitive policy for residential mobile homes in the 1991 Structure Plan was removed for the new plan in 2001. It notes problems with insulation and energy efficiency in older units but states, "the modern "Park Home" types of units developed by the industry over the years give a much improved degree of thermal efficiency albeit still not as good as the Technical Standard provide for permanent buildings". The report acknowledges that the space standards are lower than would be expected of residential development, but refers to Mark Bevan's work for the Scottish government which found that Park Homes were more likely to be occupied by single and retired people and could fulfil

a housing need which is otherwise hard to meet. Potential advantages in meeting the needs of different parts of the community, providing safe environments, and creating affordable housing in the countryside are all identified. Regarding energy use the report stated, "clearly, permanent construction can offer better compliance with the "maximise energy efficiency" test but that drives up capital cost so the equation is complicated by the cost of embedded energy in permanent construction and non-housing energy costs arising from car use to access services".

There is also an interesting technical note included in the report which recounts the time taken to resolve issues relating to land contamination, stating, "just because these structures are caravans and not permanent buildings it does not mean that contaminated land requirements would be significantly less onerous than would have been involved in the approved housing development. The survey stage proved lengthy and complicated but the eventual outcomes do represent less capital cost than would have been required for permanent building".

Planning permission was granted in 2010 with various conditions relating to road safety and the water supply. However, three other conditions are especially notable, mandating:

- the prohibition of installation of any street lighting or pole mounted lighting to protect the rural character of the area.
- screen tree planting and the clearing of materials in a designated area to create informal recreational space for residents
- that caravan construction will accord to BS3632 to achieve U values of 0.3 W/m²K and 0.5 W/m²K for roofs and walls respectively for residential amenity and energy efficiency.⁶

Source: McCracken, 2010.

⁶ This condition might be considered unnecessary as Park Homes are generally only ever constructed to at least the most recent BS3632 standard.



Image provided by: Omar Park and Leisure Homes

9.2.6 Temporary Consents

Whilst planning permissions granted for residential caravans may be permanent, one planning authority drew attention to the possibility of temporary consent:

they were given ten year consents on the basis that they, over time every renewal of the consent would seek to improve the amenity in some way or ensure that the park hadn't deteriorated too much, and as a result of that process every ten years I think the more recent efforts were to do with ensuring that the roads within the park were maintained well, ensuring that there was an area of open space within the park and in some cases reducing the number of units.

(PP7, PA7)

However, the officers suggested that this approach had not been successful, with significant concerns developing around the maintenance and investment on the park. In addition, such an approach raises significant issues as to the ramifications for residents if consent was not reissued.

9.2.7 Planning Breaches and Enforcement

If operational development or a change of use for residential caravans takes place without planning permission or if a condition on a previous planning application is broken, this represents a planning breach. In such situations a planning authority may seek a retrospective planning application or issue an enforcement notice. Some participants suggested that enforcement can be challenging for planning authorities because of a lack of resources, difficulty of monitoring occupancy and reliance on receiving intelligence from the community.

9.2.8 Licensing

Whilst this study focuses upon planning, it is important to note the relationship between planning and licensing in relation to Park Homes. There are two elements to this relationship. First, to gain a residential caravan license, applicants will need to demonstrate lawful use or planning permission for the site. One planning officer commented on how the recent changes to legislation requesting operators re-apply for licenses had resulted in a couple of applications for CLUDs. Some planners drew attention to how planning breaches and enforcement notices could affect their ability to gain a license.

Secondly, there are several elements relating to a site that might ordinarily be covered by planning for a residential development that are actually covered by licensing for residential caravans. Licensing authorities draw on the Model Standards for residential caravans in this regard, which were recently updated (Scottish Government, 2018). Standards on the following are included:

- o Number of mobile homes, site plans and boundaries
- o Amenity and privacy
- o Roads, gateways and traffic routes
- o Pedestrian routes
- o Bases and hard standings
- o Supply and storage of gas
- o Electrical installations
- o Oil storage tanks
- o Water supply
- o Drainage and sanitation
- o Flooding
- o Lighting
- o Domestic waste
- o Notices and information
- o Site maintenance
- o Additional structures and alterations to existing structures

- o Mobile homes let by the site license holder for permanent accommodation
- o Parking

One participant noted the specific difficulty of dealing with layout issues for Park Home developments compared to residential development, commenting on how the design of the site may need to change based on the size of the units buyers choose to purchase. The nature of Park Homes and the above responsibilities for licensing means that, in the view of one participant, planning authorities are sometimes more relaxed about such issues because they see Park Homes as a distinct type of development. This participant also recalled how in one case the licensing authority tried to consider the site in terms of planning issues:

...the planning authority were satisfied that the planning permission that was originally granted back in the '70s didn't preclude residential use of the site...reluctantly, accepted that our client, from a planning permission perspective, was quite entitled to develop the site for residential purposes...What the council then tried to do – basically it was the politicians – through the caravan site licence application, was to try and stop the residential element going ahead by citing things like lack of space in primary and secondary schools; lack of space for doctors' surgeries etc. So, we had to go to the Sheriff Court to argue these points out. We won the case and that was fine.

(Planning Consultant)

9.3 Acquiring Certificates of Lawful Use and Planning Permission

This subsection focuses primarily on the developer perspective of planning in relation to Park Home development. The views are organised around two themes: general perceptions of planning and local authorities; and experiences of planning.

9.3.1 General Perceptions of Planning and Local Authorities

When asked about their general perception of planning, one park operator simply responded, “planning hate us; planning hates mobile home parks.” (Park Operator 2). The general sense was that planning and local authorities more broadly were unsupportive of such developments. For some this was partly explained by a lack of awareness of the concept, with one commenting, “I think even council and planners probably don't get it half the time” (Manufacturer 3) and another stating, “I think they have very little understanding of it, with all due respect to them” (Manufacturer 1). The latter recounted a recent experience:

...the gentleman I spoke to in the planning department had no idea about mobile home parks and kept calling [them] holiday parks and static caravan parks. I was trying to explain that they were residential retirement villages and they didn't know what it was and how it would work.

(Manufacturer 1)

A number of other reasons to explain planning authorities' perceived hostility were suggested aside from material planning considerations. These include lower council tax income, low planning fees for changes of use, no developer contributions, and fears around their use as a site for travellers. Participants also drew attention to the negative publicity that Park Homes had received and how this had influenced both local and national government:

I also think they are fearful...there has been some very bad press over the years and even though the homes and the sites have improved vastly over 20 years, because the local governments, local councillors, MPs don't come out and see the parks, don't come and meet the manufacturers, they still live in a time of 20 or 30 years ago when Park Homes were sink estates.

(Manufacturer 1)

Several participants suggested that the industry has failed to promote itself adequately and had to do more to present itself accurately.

One participant suggested that planners' perceived opposition to Park Homes was because of the role of CLUDs and site licensing, reducing the ability of planning to influence development. Whilst it was thought that planners would probably be more encouraging of traditional housing development, the perceived negativity of planning toward Park Homes was not universal:

I've never got the impression – certainly in Scotland – that there is discrimination against Park Home sites... It's still another form of residential land use, so the council really can't be concerned about whether it's Park Homes that are developed for the site or mainstream housing. So, I think to be fair to councils, they're not prejudicial one way or the other.

(Planning Consultant)

9.3.2 Experiences of Planning

Participants set out a number of planning challenges for Park Home developments. Some commented on the lack of planning policies in LDPs:

Because they are caravans as such, again it's that we are not traditional housing. The councils have no policies around Park Home sites. They have policy for traveller sites and they will say we must have x amount of traveller sites, the gypsy community...But there is no policy for residential Park Home sites for the regular population. There is no policy that's actually set down that says we must have x of those...there is no policy to guide it at all

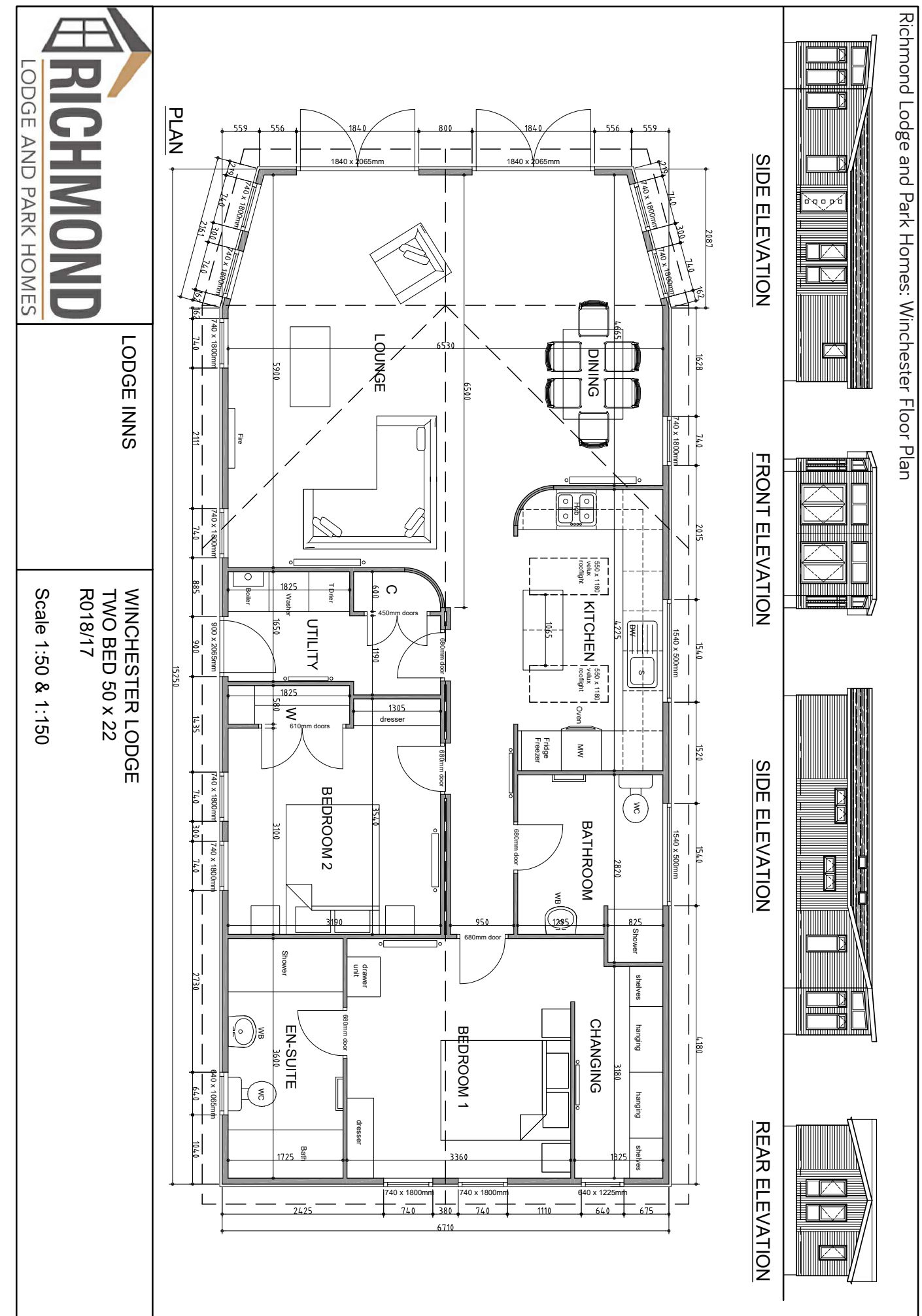
(Manufacturer 1)

The lack of guidance from Scottish government was also commented upon and an inconsistent approach by planning authorities was identified by some. One participant argued that planners today have little time to give proper attention to the Park Homes concept:

...when I first started 20 years ago, I could ring my local planning officer anywhere in the UK. I could meet them onsite within two weeks..Now what actually happens is we pay a fee. They don't come out and see you. You send them a letter...They just see the word again "we're applying for residential caravan park". They write back saying we don't think it's a good idea. You try and ring them to speak to them. You can't speak to anybody. You can't speak to the same person...It's very difficult to even get past that start line...the council planning departments, licencing departments are so busy because they are so under [resourced] that they don't get out and see mobile home parks generally...You can never convey in a letter how it may look. You're not meeting them on site and explaining to them. They don't know anybody that lives in a mobile home park so they're not going to meet any residents who have been there for ten/fifteen years and think it's the nicest place they've ever lived.

(Manufacturer 1)

Some participants also spoke of the opposition that they had faced from local communities at the planning stage, who may see developments as 'shanty towns' or are prejudiced against gypsy and traveller communities who they fear will be moving to the site. Challenges around what would ordinarily be permitted development rights for outbuildings were also discussed. One operator also recounted how the potential for future poor management had been raised with them in a planning meeting, with the local authority potentially fearful that the site would be sold on to a less scrupulous operator in the future.



10.1 Introduction

This section explores Park Home development from the perspective of planning officers. It is divided into two subsections. The first considers the general perspectives of planners on Park Homes, including their role in providing both retirement and affordable homes. The second subsection provides greater detail on the specific planning concerns raised around Park Home development.

10.2 Planners' General Perspectives

Several planning officers who participated in the research admitted that they only had a basic understanding of Park Homes, often because of a lack of interest by developers in bringing forward this type of accommodation.

...I mean I don't really know an awful lot about Park Homes I have to say but in my mind I have them as just being a bigger, fancier type of caravan. To my mind you go to a caravan for a holiday. You don't live in it all year round.

(PP1, PA1)

Others admitted that their knowledge of the concept may not be up to date, with one planner commenting, "our view of the matter might be coloured by the fact that we have got sites that are forty plus years old and some of them are not in a great state" (PP8, PA7).

Officers had a range of views on the suitability of Park Homes. For some, they were a completely inappropriate form of accommodation, with one commenting, "everything about them is unsustainable...I just think on every level it's a bad idea. It's socially unsustainable" (DM2, PA1). Some justified this view based on the need for planning to offer "broader policies in the public interest rather than just meeting private demand." (DM3, PA1). Many others, whilst still having concerns over some aspects of Park Home developments, were much more open to the concept:

Of themselves, it's not, I don't think it's necessarily a bad option, and it has benefits, I think, both in terms of maybe people might find it useful in terms of equity release. It can be quite a secure environment, I suppose, in the broad sense.

(DM6, PA6)

Another commented, "I think you would need the right type of conditions, and if it's the right site, then there is no reason why something like that couldn't work" (DM7, PA5) and a third said, "it's not something I would choose, but if other people like the sense of the community and being closer to the countryside and so forth then...why not?" (PP7, PA7).

Participants also discussed the potential for Park Homes to meet the needs of an ageing population. Several planners commented on how, from a planning perspective, the age of the occupant does not have much influence, "from a planning perspective, a dwelling house is a dwelling house. We're, generally speaking, not too interested in who occupies that." (DM3, PA1) Another commented similarly, but acknowledged that housing more suitable for older people was being actively encouraged through affordable housing policies.

As has been discussed in earlier sections, many planners did recognise the affordability benefits that Park Homes could offer. However, one planner dismissed this, remarking, "it is affordable because it's constructed to a cheaper standard." (DM3, PA1). Others were also fearful of meeting affordable housing needs through what could be a poorer standard of accommodation:

...my impression of Park Homes is this...tin shack type thing for want of a better term, but I suppose you could have a new generation of Park Homes that has the latest insulation values and has a more pleasing appearance, more like a second generation pre-fab almost, and that would offer people a bit of garden growing round about, might be more attractive than going into a block of flats with many people, for example. So, there might be something there, but it would have to look attractive and not in any way be seen as a second-class form of housing our affordable housing needs. It would have to meet all the latest standards in terms of insulation, easy to heat, noise insulation. You would need it to cool down as well... I wouldn't want to rule it out. There might be something there potentially, but I think our councillors ...would run a mile from any suggestion we were sort of [massing] trailer parks to house our council house waiting list.

(PP7, PA7)

There was also discussion around how Park Home development would actually arise to meet affordable housing needs given the apparent lack of interest from developers and the fact that planners do not specify building types in plans, "I can't think of a reason why we would ever find ourselves saying...to meet that particular need affordable housing here must be provided by Park Homes" (PP7, PA7).

This connects with a wider point identified in the interviews and focus groups with planners. Several participants suggested that traditional housing is the default and would be preferred. One planner commented, "if you've got a site good enough for a caravan [on] a permanent basis then it's good enough for a permanent home" (PP3, PA4) and another simply put it, "It's a house so why don't we just build a proper house and design it properly?" (DM1, PA1). This was also connected specifically to affordable housing provision by one planner, who argued that affordable housing requirements should be met through traditional development.

10.3 Planning Concerns

This subsection considers in greater detail the concerns that planning officers raised with parks homes for conversions, expansions and hypothetical brand new developments. These are grouped around four themes: construction; location and services; appearance, design and management; and resident mix.

10.3.1 Construction

As has already been partly discussed, some planners questioned the construction of Park Homes. Accessibility and adaptability was identified as an issue which would be raised with prospective developers, given their prospective occupation by people in later life. Many of the concerns, however, related to the impact of the climate in some areas of Scotland and how the structures would perform regarding energy efficiency:

I don't know how well they perform, energy wise. Energy is a big focus for us, particularly reducing decarbonisation of heat and that whole agenda. So actually, how energy efficient these are, and I imagine they will not be greatly energy efficient, compared to standard housing, so that's an issue, particularly given the nature of the residents who would be looking for warmer environments, they tend to need more heating

(PP5, PA6)

Another planner also suggested that this might not be the appropriate policy environment to make the argument for Park Homes as structures, given the increased attention on building regulations in the wake of the Grenfell tragedy. It was also suggested that design changes to typical Park Homes may need to be requested depending on their location by one planner, who raised the requirement for 45 degree roof pitches for homes in their area due to the wind and rain.

10.3.2 Location and Services

Several planners raised several issues regarding the potential location of Park Home development. For conversions and expansions this partly came down to the fact that the land is unlikely to be allocated for any kind of residential use. The specific conditions identified by one planner which might make such developments acceptable included development linked to a rural business, the one-off development of one house or the expansion of an existing small group of homes by one or two units, none of which would be met by Park Homes.

Several planning officers were also concerned that conversions from holiday sites could have a negative economic impact, with tourism impacts diluted. There has already been some discussion of participants' views of how rural Park Home developments may not allow residents adequate access to services because of poor local amenities and meagre or non-existent public transport. Planners argued that sustainable locations very close to or within a town with relevant facilities may be acceptable. One planner suggested that this was the critical issue:

We've got one at the moment which is a site where it had been given consent as holiday accommodation with some residential, and I think there's some there that have been used as residential, but don't have planning permission for use. But in essence, they're effectively within a town. And we would have no objection to them being sort of mainstream or Park Homes because of where they are...we wouldn't take enforcement action, [to] positively address the fact that they're unauthorised, because effectively the use would be acceptable.

(DM6, PA6)

The same planner also discussed another park which they explained would not cause planning concerns if they were to expand because of its location on a bus route and within walking distance of both a supermarket and hospital. Interestingly, they also suggested it was important to be mindful of the reverse issue which would apply to retirement housing developments more broadly, where local services, such as healthcare facilities, struggle to keep up with the new increase in demand.

10.3.3 Appearance, Design and Management

Concerns as to Park Homes' appearance were twofold. One planner was concerned of the design of Park Homes compared to permanent housing, fearful that they would have a "temporary appearance" (DM4, PA2). More generally, participants raised issue with the appearance of Park Homes in relation to their wider environment:

The issues I would have with that sort of thing...would be the fact that a residential caravan couldn't really bring that same quality of design that a house would bring to a site. It wouldn't reflect a local identity there. So, its design standards would be questionable.

(PP3, PA4)

Aside from the design and appearance of Park Homes, several planners had concerns about the design of the parks on which they would be sited. Participants cited the narrowness of the roads and footpaths and argued there could be higher densities of units than traditional developments, creating issues for privacy and reductions in garden space. Participants also mentioned potential problems around constrained access to the site and questioned how parks would be serviced, for example, by refuse vehicles. One participant suggested design expectations may be especially difficult to fulfil for parks looking to convert from holiday to residential use:

They have to have the parking requirement delivered, which before it was just communal, park where you can, near the chalet. The street lighting falls short of the required standard, the road width, the pavements are non-existent. Even the shared drainage system doesn't meet the standard and so on...to make the changes that then have to meet the standard required for housing, it just seems a nightmare, it's really problematic.

(DM5, PA4)

Another planner raised the issue of how expansions of existing parks lead to a loss of open space, reducing an integral element of the amenities provided on site.

Some planning officers also discussed their fears concerning the management of parks after development had taken place. Participants spoke of how they would want to explore how easily residents could be "turfed off the land on a whim" (PP8, PA7) and discussed their concerns around the maintenance of common areas without the use of a traditional factor arrangement and tensions between residents and the park owner. Some planners discussed their experiences of parks in their area which had suffered from a lack of investment creating tensions between residents and the owner. Another planner raised a distinct issue in the relationship between planning, licensing and park management:

...generally, we find site owners do not enforce the terms of the license conditions....they tend to let people just do what they would like to do...we have had [residents] apply for extensions to these buildings...you then end up with a kind of temporary caravan with a permanent extension which you get this conflict of the planning process...so we actively refuse those...People trying to build conservatories onto what is a caravan...it shouldn't really be the person that has a caravan applying, it should actually be the site owner because in most cases...they own the land the thing's actually been built onto, and they really should be much more overt and up front about saying to the owners of the caravan, "No, you can't do that."

(DM6, PA6)

10.3.4 Resident Mix

Finally, some planning officers also raised two issues around the mix of people on parks. First, there was concern around the age-segregated environment of many Park Home developments, as previously discussed, which would be applicable to any retirement development:

...from a planning perspective the overarching policy driver is to create mixed communities in terms of people together to create a sustainable community rather than ghettoising particular types or sectors of the community. Rather than seeing retiring folk move out to rural areas, perhaps we should be looking at that more sustainable model that's currently being experimented with where older folk are contributing to the care of young children and so on as well and exploring those sorts of options

(DM3, PA1)

Secondly, another planner questioned the appropriateness of mixing a holiday use with mainstream residential Park Homes on sites which have both types of accommodation.

11 Perspectives on Reform and Guidance

11.1 Introduction

This section focuses on perspectives on reform, primarily for planning but also with some discussion on licensing and wider aspects, drawing on interview and focus group data. The section is divided into four subsections.

11.2 Planning at the Local Level

Some participants spoke of how local authorities should be more open to the concept of Park Homes and recognise the benefits that they could bring: “In the right places – as long as they generally comply with the policy – [planners should] not...be close-minded about Park Home developments...there is a niche for them” (Planning Consultant). One manufacturer argued that benefits for older people such as affordability and one-level design need to be reflected in the way planning applications are considered, with Park Home applications treated as housing. This participant explained how they would like to see planning applications for Park Homes result in greater detailed discussion, “We don’t even get that far. This is the issue...we’re not even allowed to get to that point.” (Manufacturer 1). It was argued that the potentially positive role of Park Homes should also be recognised in local planning policies:

I would say that there should be a general recognition within...local development plans that Park Homes can...fulfil a certain function in terms of providing new affordable – in open, close brackets – housing and it's another housing and residential option that should be made available where the general principles of residential development are acceptable...there should be a positive recognition that Park Homes can provide part of a solution for housing needs. It shouldn't just be flats or houses...there is the Park Home option as well.

(Planning Consultant)

It was also suggested that there may be a need for planning authorities to reflect on enforcement issues around conditions limiting sites to a holiday use, given a potential increase in this “informal” practice.

11.3 Planning at the National Level

Interviews and focus groups captured discussions on the potential for reform at the national level. There were mixed views among planning officers as to whether new planning guidance on Park Homes would be welcome. A few were sceptical of whether there was a need and questioned whether it should be left for local authorities to determine their policy without the government’s influence on this matter. Others were more positive about the potential benefits of guidance, admitting that there may be a lack of skills in this area and recognising that Park Homes fell into a “grey area” or “black hole” in terms of how they were treated and the relevant legislation. It was suggested that national guidance could reduce some of the variation in how Park Homes are treated by planners in Scotland. One planner spoke of how there was increasing recognition of planning issues in this area:

In terms of the government and other organisations, from the discussions that I've had with colleagues...professionals, representatives...from all of the planning authorities and the national parks is that there is an awareness of the issues around caravan sites in general, and issues around Park Homes as well.

(DM6, PA6)

One participant commented that Scottish government guidance can create an “impetus” around an issue but questioned what difference it would make when it “hits reality” and the nature of the land market (PP8, PA7).

In relation to what changes might be welcomed, participants were asked about how Park Homes should



Image taken in deanland Wood Park, Hailsham, west Sussex and provided by BH & HPA



Image provided by Stately Albion

Image provided by Omar Park and Leisure Homes



Image provided by Richmond Lodge and Park Homes

be considered in the future. The potential for Park Homes to be treated under a new use class, neither as dwellings nor caravans, was considered attractive by some. Planners who were more opposed to Park Home development questioned why a new category would be needed, suggesting it would just be a “use class for substandard house” (DM1, PA1). Others suggested their default sui generis classification could be made clearer:

...I could see Park Homes being a different use class, I mean flats are a sui generis use class, even though they provide the same function as a dwelling house, just in a slightly different form, so perhaps a Park Home is no different...it could be a separate use class, or it could just be taken out of Class 9 and created sui generis. If guidance came out to that effect, it would help things.

(DM5, PA4)

However, this participant did recognise that in their area such a change would make converting from holiday parks to residential parks more difficult because of the inability to accept such developments under local ‘housing in the countryside’ policies. Other participants discussed the potential for Park Home developments to be considered a Class 8 land use if care provision was included.

Some participants also discussed the way Park Homes are considered potentially overlaps with other structures such as huts, modular buildings and innovative new residential experiments, such as those with shipping containers. Planners considered how the lines between some of these types of development were becoming blurred.

One of the manufacturers commented on how the restrictiveness of planning around Park Homes may actually encourage rogue park operators:

I think it's maybe the changes to the planning that need to make it easier to open and operate and that way it would drive out the rogue elements...I think because the planning is so difficult that it's geared towards the rogue elements of society who are taking over parks to make the income and it makes [it] very difficult for genuine operators to compete with them.

(Manufacturer 1)

11.4 Licensing

Several participants offered their views on how they thought the new licensing system which came into force in 2017 would work. There was a low opinion of its likely impact:

How can I say this politely? I think it's all a nonsense. A Fit and Proper Person's Act is very simple to get round...all the rogue operators will do is, and they do do, they put a front man in that business...everyone knows it's the worst kept secret in the world, the council know that actually it's owned by somebody else...I know from experience that in Scotland there are ten or fifteen parks that the council have given fit and proper licences to and we won't deal with them as a company because we know that those people are not fit and proper...

(Manufacturer 1)

The same participant also questioned the impact of the five year nature of the new licenses because of how Park Home sales work, suggesting that the owner might have sold a good number of homes and made their profit before its time to renew the license. One of the operators spoke of how they expected the legislation to make little difference but did recall how park owners with poor management practices had disliked the

proposals at a consultation event they attended and suggested it may “calm them down” to an extent (Park Operator 1).

However, this participant suggested that legislation was always going to be limited in what it can achieve and that the power of the market needs to work to weed out poor practices:

They need change. I know that's a big ask but I actually think that will happen. I actually think it will get to the point where it's not worth them behaving badly. I mean, we make far more money than they do on the parks because we keep to the rules...If we didn't keep to the rules we wouldn't have a local estate agent and solicitor selling our houses for us. They would run a mile. The whole integrity of our business would fall apart.

(Park Operator 1)

One local authority officer, who did not work on licensing, stated that the new system would have little impact on parks where holiday licenses were being broken as there were a lack of complaints about the issue and lack of impetus to prioritise the issue.

There was also little confidence in the new provision for a local authority to become an interim manager for a site if an operator lost their license, with one participant questioning whether this had happened at all and how it would work in practice. Indeed, one planning officer suggested that from their understanding this would be a “rare power to be used” (PP6, PA7). One of the manufacturers also questioned how the transferability of licenses when parks are bought and sold could be governed.

In contrast to the above, one manufacturer did suggest that the changes could be positive for the industry and one operator was doubtful that the new system would have any impact but argued that this was not necessarily a reason for it not to be introduced.

There was a suggestion by some that there was a lack of understanding on licensing and more guidance may be needed. One of the park operators recommended that a more consultative approach may be better, rather than what they saw as the unnecessarily heavy handed tactics used by some licensing authorities. Some participants suggested that the legislation and Model Standards for sites are out of date and require reform, with arguments put forward both that the standards are too restrictive and that they are too low. The new Model Standards have since been published.

One participant also made especially interesting points recognising the interplay between planning and licensing for Park Homes and a lack of understanding on the influence that planners and licensing officers could have on each other's work. The officer suggested that guidance was needed to recognise the relationship between the two areas:

...It's one of these areas where you're kind of having to use both bits of legislation to drive that owner to regularise activity in order to allow them to get the license. What we don't know at the moment is whether or not the license can actually be issued in terms of distances and model standards for caravans and all the rest of it...there's not really, the advice and proper holistic guidance issued in terms of the government, in terms of how both regimes interact properly, what the implications of one are for the other. I think in a lot of planning...professionals' heads, it's like, “Well licensing will deal with that.” The problem is from the licensing side of things, they are then obliged to follow the planning consent. So, there's this kind of real tight

symbiotic relationship between the two bits of legislation because if we approve something, it creates an issue maybe for the license.

(DM6, PA5)

11.5 Wider Changes

Several participants alluded to reform which was outside of planning and licensing. One participant made a general point about the need for greater policy attention towards this area overall, with more research into how many people are living on holiday sites permanently and the levels of demand for care services on site and how this changes with an ageing population.

As has been discussed earlier in the report, occupational therapists discussed potential changes to the rules around home adaptation grants for Park Home residents and their interest in Park Homes becoming more 'future proofed'. In addition, one of the operators recommended a rule for parks which prevented park owners re-purchasing residents' Park Homes, due to the temptation to pressure people into sales. This was the approach this park operator had taken. Whilst they recognised that this would prevent redevelopment of older parks, they argued it was worth considering for new developments:

I met the civil servants...their argument was...they could have that as a rule and that would pretty well cure it. But if you take the park that's started [years ago]...They've got to allow the owners to buy them to allow the redevelopment of the park. So, if you bear that in mind, I think, for new parks you always write the rules that you don't trade on your own park is a good idea...You would add a huge amount of protection. Whether anyone will be bright enough to see that we get that protection with that rule, I don't know. I can see it.

(Park Operator 1)

The same participant did, however, suggest that abolishing the 10 per cent commission that Park Home owners receive on resales, which has been discussed in the past, could lead to a lack of investment in parks in the future.



Image provided by Richmond Lodge and Park Homes

12 Key Findings and Recommendations

12.1 Introduction

This section draws together the findings of the study and presents recommendations for policy and practice. The research has been completed at a particularly opportune time. The Scottish government has made clear its intention to engage in major reform of the planning system, with the introduction of the Planning (Scotland) Bill to parliament in 2017. The government has outlined 20 proposals for change, with improved delivery of homes central to several. These include plans for Simplified Development Zones, use of the National Planning Framework for identifying strategic housing land requirements and greater emphasis to be placed on the delivery of infrastructure. Proposal 11, which seeks to close the gap between planning consent and the delivery of homes, sets out the following commitment:

We will continue to work with others, including through the More Homes Scotland approach, to ensure that planning does all it can to enable the building of more high quality homes of a broader range of types, and in a way which strengthens places and quality of life

(Scottish Government, 2017c, emphasis added)

It is within this policy context of improving delivery through planning reform that the following findings and recommendations are presented.

12.2 Key Findings

1. There are a number of potential advantages to Park Home living in retirement. These include: the potential for equity release; access to accommodation which may otherwise be unaffordable due to location and design; reduced maintenance; bespoke designs; access to outside space; a safe, scenic and peaceful environment; and access to a community of a similar age (Figure 12.1).
2. There may also be advantages to local authorities of Park Home developments including: the relatively quick delivery of accommodation; providing downsizing options to older residents; providing greater accessibility benefits; and the indirect impact of freeing up larger homes to which other people can relocate. They also have the potential to meet the policy goal of increasing the range of homes available in Scotland (Figure 12.2).
3. Very little research has been completed on Park Homes in the past. There is a critical lack of research exploring Park Homes in relation to: planning; impacts on health and wellbeing, quality of life and service use; accessibility and adaptability; energy efficiency; people who leave parks; and identifying circumstances where they would be more appropriate than traditional housing.
4. The number of parks and Park Homes varies dramatically across Scotland. The little data available suggests Perth and Kinross, Argyll and Bute and Dumfries and Galloway have a relatively large number of parks and Midlothian, Moray and Perth and Kinross have a relatively large number of Park Homes.
5. There is no perfect retirement option and there are potential disadvantages to Park Home living. However, some perceived disadvantages, such as a lack of adaptability and poor energy efficiency, may be more applicable to much older models rather than new Park Homes. Others, such as concerns over needing to replace the Park Home periodically, are based on misunderstandings.
6. The market for Park Homes may have been slower to develop in Scotland than in other parts of the UK but there are reports of increasing demand in some areas and a perception that there may be greater untapped potential for the future here than elsewhere.

7. The majority of planning authorities in Scotland do not have a specific policy which relates to future general Park Home development. The significant minority which do have such a policy are all unsupportive. The reasons cited include the local climate, Park Home construction/design, and their visual impact. Of the 11 planning authorities with proposed plans available, just one had a (potentially) supportive policy toward Park Homes.

8. There are broadly five ways that land can lawfully have Park Homes sited upon it in planning terms. These include historical planning permission and continuous use for 10 years or more, which are both recognised through issue of a Certificate for Lawful Use or Development. This is a legal test and does not involve accordance with planning policies. Land may also see Park Home development because of changes of use from holiday caravanning, expansion of existing parks or, hypothetically, completely new development. These developments would require planning permission.

9. Planning issues raised by officers in relation to Park Home development include: their construction, energy efficiency, performance in harsh climates, and adaptability; sustainable locations and access to services; their appearance; park layout; park management; and the resident mix. However, these perceptions may be explained by a lack of awareness among some planning officers as to the nature of Park Homes, especially new models, with knowledge and experience sometimes found to be based on vague perceptions and older parks and units.

10. Inconsistencies in how to treat Park Home developments from a planning perspective were identified. There appears to be confusion over whether Park Home development proposals should be treated as caravans or a Class 9 dwelling use. This often differed based on whether applications are for converting a holiday site, expansion of an existing residential park or completely new development. There may also be confusion as to the respective roles of planning and licensing and their relationship in Park Home developments as well as in relation to developer contributions and affordable housing provision.



Image provided by Richmond Lodge and Park Homes

Figure 12.1: Attractions and Potential Benefits of Park Home Living

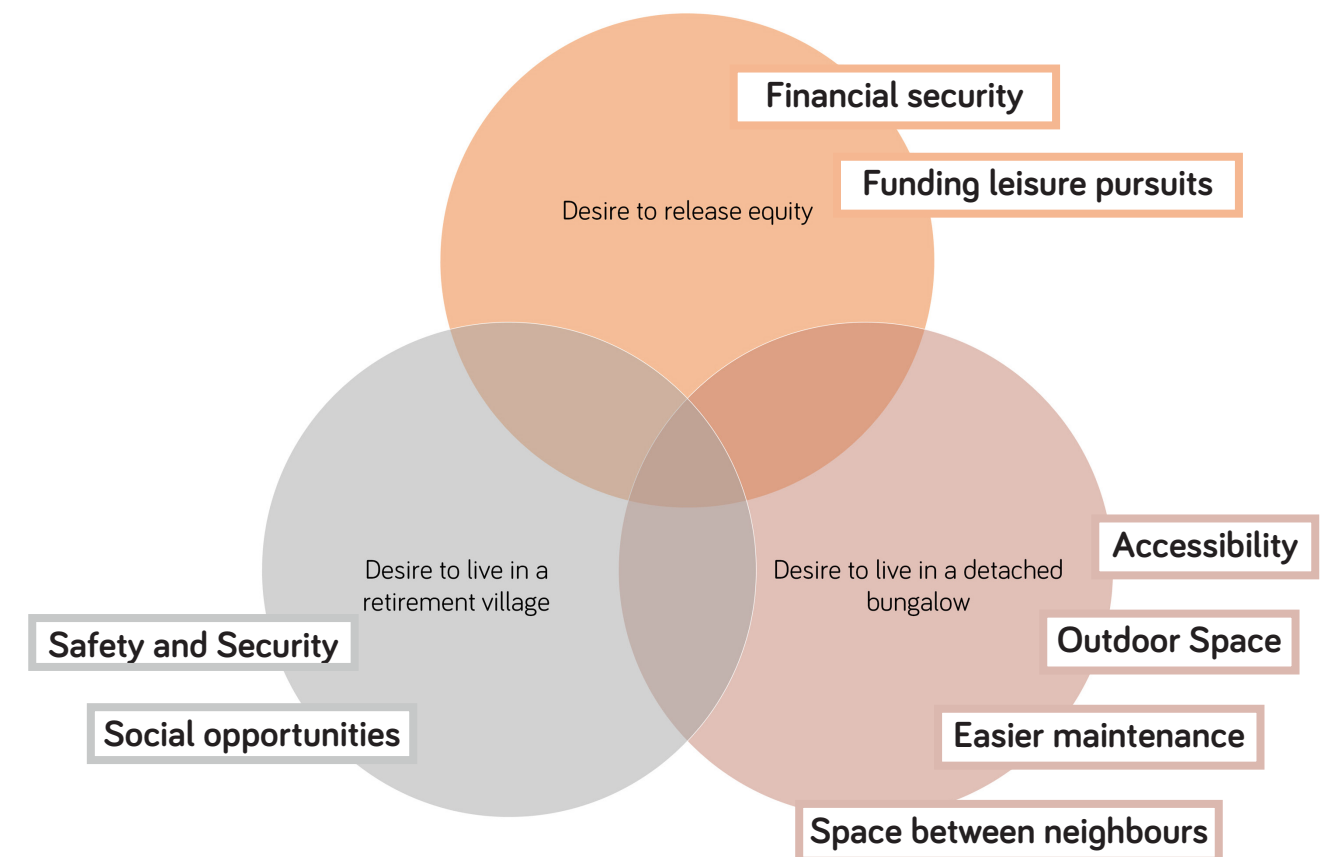
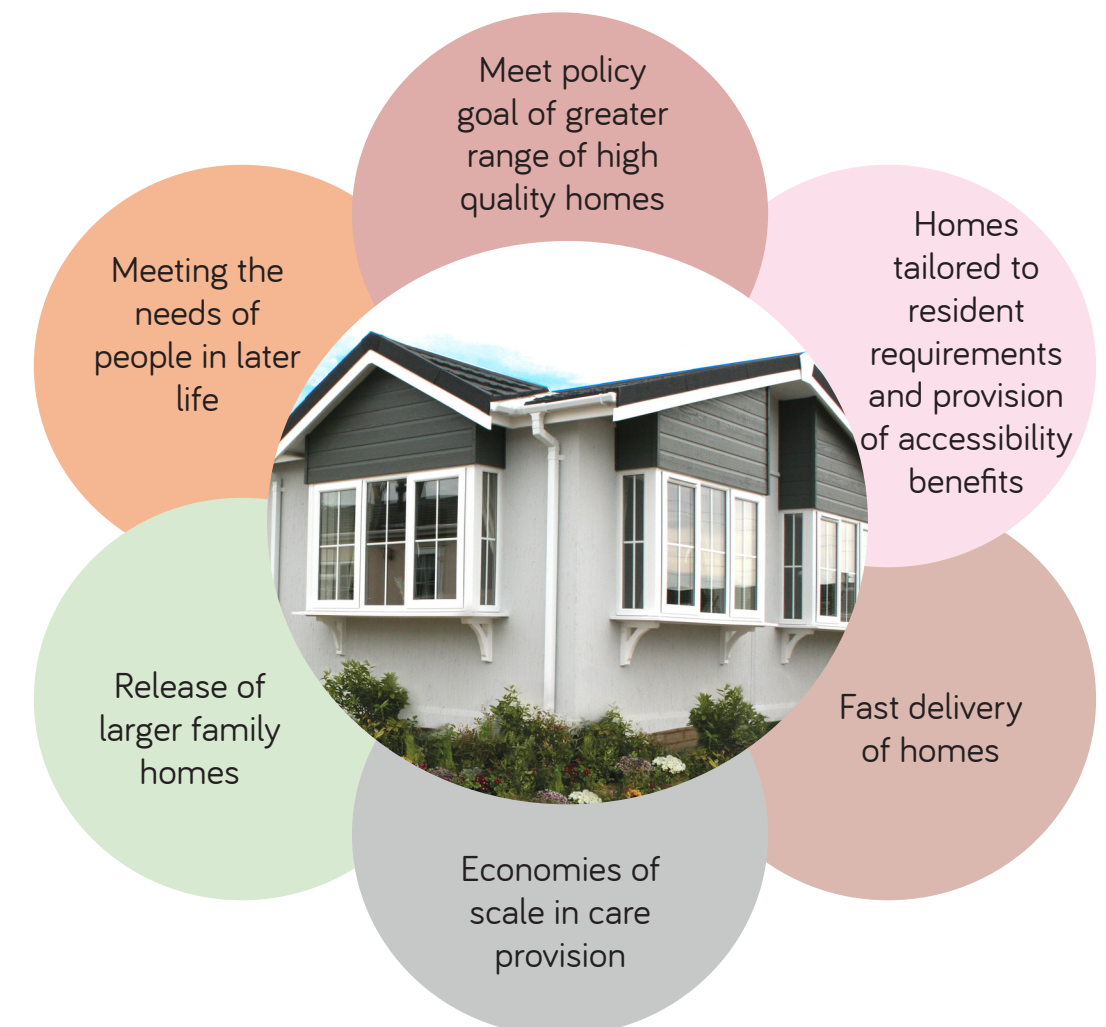


Figure 12.2 Potential Benefits of Park Home Developments to Local Authorities



12.3 Recommendations

1. The Scottish Government should commit to producing national planning policy on retirement accommodation which details how future needs can be met and includes consideration of the potential of Park Homes.
2. Planning authorities should be open to the possibility of Park Home developments in meeting the needs of an ageing population. Prohibitive policies, potentially based on vague and dated perceptions of Park Homes, should be reconsidered to allow development proposals to be considered on their own merits.
3. The Scottish Government and the Royal Town Planning Institute (RTPI) Scotland should provide planning officers with information on the nature of Park Homes and guidance on how developments should be considered. A planning delivery advice note should be provided after extensive consultation with all stakeholders, including the RTPI Scotland and the BH&HPA. This advice should include the following (see Appendix 2 for further details):
 - a. Background information on relevant legislation, the construction and appearance of new Park Homes and the potential advantages of this retirement option.
 - b. Clarity that Park Homes are legally residential caravans and should be considered as such in planning terms, rather than a Class 9 housing use, and do not have permitted development rights. Park Homes should be treated as residential caravans regardless of whether planning applications are for conversions from holiday sites, expansions of existing residential parks or entirely new developments. This would be consistent with the fact that Park Homes are not legally houses.
 - c. Guidance on the locations which would be more appropriate for Park Home development. Park Home developments would generally take place on land suitable for residential development but would not have to fulfil all residential/housing policies of planning authorities. Redevelopment of sites for housing would require a planning application. This would ordinarily be on land designated for residential development. However, Park Home development might also take place on land not designated for residential use in limited circumstances where there is demonstrable proximity to everyday life amenities.
 - d. Implications of considering Park Homes as a retirement option for density, open space, landscaping and traffic generation issues.
 - e. As an affordable option for people in or nearing retirement, the appropriateness of developer contributions for affordable housing and education should be detailed.
 - f. The relationship between planning and licensing in Park Home developments and their respective responsibilities.
4. The Scottish Government should monitor the impact of increased funding of planning authorities through higher planning fees introduced in 2017. Achieving the policy goal of a greater range of types of homes will require openness to innovative new forms of accommodation to meet growing demand from an ageing population. This necessitates sufficient resources to explore, learn and understand the potential of niche options, such as Park Homes.

5. The Scottish Government should monitor the impact of the new licensing system introduced in 2017 and its success in preventing poor management practices on parks. New regulations should be considered if some parks continue to be managed poorly.
6. The Royal College of Occupational Therapists in Scotland should work with Park Home manufacturers to understand the potential adaptability of units. The Scottish Government should allow Park Home residents to access home adaptation grants available to people living in mainstream housing, as is the case in England and Wales. The government should also review eligibility for other grants and benefits for Park Home residents.
7. Further research should be conducted to provide a fuller understanding of the potential of Park Home developments in meeting needs in later life, including:
 - a. evaluations of impact on new resident health and wellbeing and service use
 - b. adaptability and future-proofing
 - c. in-situ energy performance
 - d. the investment potential of Park Home purchases
 - e. Park Home leavers and their destinations
 - f. circumstances where Park Homes may be more appropriate than traditional dwellings
 - g. exploration of prohibiting park operator re-purchase of homes and its potential impacts on management behaviour and future investment
 - h. the impact of the new licensing system on Park Home management practices and how local authorities enact their new interim management powers

The findings of such research should be disseminated widely to counter outdated perceptions.



Image provided by Stately Albion

Table A1

Planning Authority	Policy Identified	Location of Policy	Classification	Justification Provided for Policy	Notes
Aberdeen City Council	Yes	Supplementary Planning Guidance 1.5 - Temporary Buildings; Part 5.1 Specific Guidance for Portable Buildings; Part 6 Residential Accommodation	De Facto Unsupportive of Park Home Development	-	
Aberdeenshire Council	Yes	Policy H4 Residential Caravans	Directly Unsupportive of Park Home Development	-	
Angus Council	Yes	Policy TC7 Residential Caravans and Mobile Homes	Directly Unsupportive of Park Home Development	-	
Argyll and Bute Council	Yes	Supplementary Guidance SG LDP HOU4 - Residential Caravans and Sites (for Permanent Homes)	Directly Unsupportive of Park Home Development	Climate; visually intrusive	
Cairngorms	No	N/A	No Policy	N/A	
City of Edinburgh Council	No	N/A	No Policy	N/A	
Clackmannanshire Council	No	N/A	No Policy	N/A	
Dumfries and Galloway Council	Yes	Policy H7 Temporary Residential Development	Directly Unsupportive of Park Home Development	-	
Dundee City Council	No	N/A	No Policy	N/A	
East Ayrshire Council	Yes	Policy RES 12: Non-permanent Dwellings	Directly Unsupportive of Park Home Development	-	
East Dunbartonshire Council	No	N/A	No Policy	N/A	
East Lothian Council	No	N/A	No Policy	N/A	Does have a policy relating to the redevelopment of a specific site
East Renfrewshire Council	No	N/A	No Policy	N/A	
Falkirk Council	No	N/A	No Policy	N/A	
Fife Council	No	N/A	No Policy	N/A	
Glasgow City Council	No	N/A	No Policy	N/A	
Highland Council	No	N/A	No Policy	N/A	
Loch Lomond and the Trossachs	No	N/A	No Policy	N/A	
Inverclyde Council	No	N/A	No Policy	N/A	
Midlothian Council	No	N/A	No Policy	N/A	There is a policy on maintaining current sites and there is recognition as affordable option
Moray Council	Yes	Policy H10 Residential Caravans and Sites (within Residential Development)	Directly Unsupportive of Park Home Development	Construction and design	Recognises existing Park Homes as low cost housing but encourages site redevelopment
Na h-Eileanan Siar (Western Isles)	Yes	"Policy 14 - Caravans and Temporary Buildings; Supplementary Planning Guidances on Caravans and Temporary Buildings"	Directly Unsupportive of Park Home Development	Difficult to assimilate into open landscapes; climate leads to deterioration which leads to visual impact which leads to environmental dereliction.	
North Ayrshire Council	Yes	Policy RES 7 - Residential Caravans	Directly Unsupportive of Park Home Development	Protection of amenity of locality; standard of accommodation	
North Lanarkshire Council	No	N/A	No Policy	N/A	
Orkney Islands Council	Yes	Policy 5 - Housing - Part D - Residential Caravans and Other Temporary Residential Structures	Directly Unsupportive of Park Home Development	-	
Perth and Kinross Council	No	N/A	No Policy	N/A	
Renfrewshire Council	No	N/A	No Policy	N/A	
Scottish Borders Council	No	N/A	No Policy	N/A	
Shetland Islands Council	Yes	Policy H7 - Residential Caravans and other Temporary Residential Structures	De Facto Unsupportive of Park Home Development	Climate; temporary structures have limited lifespan	
South Ayrshire Council	No	N/A	No Policy	N/A	
South Lanarkshire Council	No	N/A	No Policy	N/A	
Stirling Council	Yes	Policy 2.13 - Residential Caravans	De Facto Unsupportive of Park Home Development	-	
West Dunbartonshire Council	No	N/A	No Policy	N/A	
West Lothian Council	No	N/A	No Policy	N/A	

Planning Authority	Policy Identified	Location of Policy	Classification	Justification Provided for Policy	Notes
Aberdeen City Council	Yes	Supplementary Planning Guidance 1.5 - Temporary Buildings; Part 5.1 Specific Guidance for Portable Buildings; Part 6 Residential Accommodation	De Facto Unsupportive of Park Home Development	-	
Aberdeenshire Council	Yes	Policy H4 Residential Caravans	Directly Unsupportive of Park Home Development	-	
Angus Council	Yes	Policy TC7 Residential Caravans and Mobile Homes	Directly Unsupportive of Park Home Development	-	
Argyll and Bute Council	Yes	Supplementary Guidance SG LDP HOU4 - Residential Caravans and Sites (for Permanent Homes)	Directly Unsupportive of Park Home Development	Climate; visually intrusive	
Cairngorms	No	N/A	No Policy	N/A	
City of Edinburgh Council	No	N/A	No Policy	N/A	
Clackmannanshire Council	No	N/A	No Policy	N/A	
Dumfries and Galloway Council	Yes	Policy H7 Temporary Residential Development	Directly Unsupportive of Park Home Development	-	
Dundee City Council	No	N/A	No Policy	N/A	
East Ayrshire Council	Yes	Policy RES 12: Non-permanent Dwellings	Directly Unsupportive of Park Home Development	-	
East Dunbartonshire Council	No	N/A	No Policy	N/A	
East Lothian Council	No	N/A	No Policy	N/A	Does have a policy relating to the redevelopment of a specific site
East Renfrewshire Council	No	N/A	No Policy	N/A	
Falkirk Council	No	N/A	No Policy	N/A	
Fife Council	No	N/A	No Policy	N/A	
Glasgow City Council	No	N/A	No Policy	N/A	
Highland Council	No	N/A	No Policy	N/A	
Loch Lomond and the Trossachs	No	N/A	No Policy	N/A	

Table A2

Planning Authority with Proposed Policies	Policy Identified	Location of Policy	Classification
Dumfries and Galloway Council	Yes	Policy H7 Temporary Residential Development	Directly Unsupportive of Park Home Development
Dundee City Council	No	N/A	No Policy
East Lothian Council	No	N/A	No Policy
"Highland Council (some area's policies available)"	No	N/A	No Policy
Inverclyde Council	No	N/A	No Policy
Na h-Eileanan Siar (Western Isles)	Yes	Policy ED3 Caravans, Huts and Temporary Buildings	Directly Unsupportive of Park Home Development
North Ayrshire Council	No	N/A	No Policy
North Lanarkshire Council	No	N/A	No Policy
Perth and Kinross Council	Yes	Policy 9: Caravan Sites, Chalets and Timeshare Developments	Potentially Supportive of Park Home Development with Conditions
Stirling Council	Yes	Policy 2.13: Residential Caravans	De Facto Unsupportive of Park Home Development
West Lothian Council	No	N/A	No Policy

14 Appendix 2: Draft Planning Delivery Advice

The following serves to outline the topics which a planning delivery advice note on Park Homes might cover. This has been developed based on the research conducted and in light of the recently published model standards for licensing. Any planning delivery advice note developed should be consulted on fully, including with the RTPi Scotland and the BH&HPA.

Background

The planning delivery advice might begin by providing context on ageing populations as a global issue and the implications for Scotland, as well as recent research which has suggested an appetite for a broader range of retirement options. An overview of the legal history of residential caravans in the UK and Scotland specifically should be provided. Details should also be given on the appearance and construction standards of Park Homes and how they differ from holiday caravans, including improvements to BS 3632. Such details should include information on both the potential for bespoke design and future adaptability. Findings from relevant research including the current study and Mark Bevan’s work on perceptions and experiences of Park Home living should be included.

Planning Status

The planning status of Park Homes as residential caravans should be made clear, setting out how this effectively constitutes a default sui generis residential use of land and not a Class 9 housing use. Planning authorities should be advised to apply this consistently across conversions from holiday sites, expansions of existing residential parks and entirely new developments. It should be made clear that Park Homes do not have permitted development rights and therefore cannot be extended in the way housing can. Redevelopment of parks would require a planning application. Planning authorities should be advised to develop a bespoke planning policy or supplementary planning guidance on Park Homes which is distinct from housing policies, based on the planning delivery advice provided.

Suitable Locations

Park Homes provide for a residential use of the land and it would therefore be expected that guidance would advise development of parks to take place primarily on land designated for residential development. However, Park Home development might also take place on land not designated for residential use in limited circumstances. This might include conversions of holiday sites and expansions of existing residential parks in locations which have high connectivity to relevant local services. Details should be provided on the specific requirements of a location in this regard with reference to the likely age-range of Park Home residents. In addition, Park Home developments may be especially suited to sites with poor ground conditions where mainstream housebuilding is commercially challenging.

Density

The recent model standards suggest that planning consent conditions can state the density of a park but that this can be reduced in the site license. The model standard states that 50 Park Homes per hectare of usable area is a reasonable level of density.

Open Space and Landscaping

The guidance should recommend that a reasonable level of open space is provided on parks with attention paid to high quality landscaping and the creation of pro-health environments where possible. These are settings which can provide opportunities to increase activity levels and improve wellbeing. For example, consideration might be given to the provision of space for small-scale allotments and gardening opportunities. The planning

guidance might advise planning officers to consider an approach centred on quality of life which provides an enriched and attractive environment for older people.

Traffic Generation

The planning delivery advice should advise on how traffic generation concerns regarding development might be tempered given the likely demographics of Park Home residents and related car ownership and how this is unlikely to contribute to traffic at peak times.

Developer Contributions

Guidance should make clear the expectations regarding developer contributions toward education and affordable housing for Park Homes. It is recognised that Park Homes can offer an affordable retirement option due to lower construction costs and therefore contributions toward affordable housing should be deemed unnecessary. Given the intention for Park Homes to be retirement communities without the presence of school age children there is a clear case that an education contribution is unnecessary.

Licensing

The planning delivery advice should provide clear details on the role of licensing for Park Homes, with reference to the new model standards. Guidance should be provided on how the responsibilities of planners and licensing officers differ with regard to Park Home developments.

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