

Environment and Sustainability Committee
Inquiry into Energy Policy and Planning in Wales
EPP 103 – Montgomeryshire Against Pylons

Environment and Sustainability Committee
Cardiff Bay
Cardiff
CF99 1NA

21st September 2011

Dear Sirs,

In response to your letter dated 2nd August 2011, this submission is on behalf of a community group called Montgomeryshire Against Pylons (MAP). As the group name suggests, this group was initially formed as a response to National Grid (NG) and Scottish Power (SP) proposals, however as the campaign has evolved the issue surrounding on shore wind energy has become a focal point. MAP has been fundamental in keeping the local communities informed on Government, Powys County Council (PCC), NG, SP and wind farm industry proposals.

The strength of public opinion in Montgomeryshire and surrounding areas is unprecedented.

The energy policy and planning in Wales is an extensive subject and this submission is by no means exhaustive.

The contents of this submission are

1. On Shore Wind Energy Production
 2. Devolution and Democratic Deficit
 3. Policy
 4. TAN 8
 5. Infrastructure & Transport Issues
 6. Socio Economic Impact on the Local Communities
 7. Carbon Reduction
- Conclusion

Members from MAP intend to give oral evidence if invited.

How can saving the planet mean the destruction of our local environment?

A confirmation of receipt would be appreciated, as would a date for the publication of the committee findings.

Yours faithfully,

On behalf of Montgomeryshire Against Pylons

[REDACTED] [REDACTED]

1. On Shore Wind Energy Production

1.1 The efficiency and cost effectiveness of on shore wind energy production is the subject of much debate. Dependent on your source of information, wind turbines can be clean green energy generators or that wind turbines are neither, clean, green nor generate a reliable source of energy. Following this extensive research, MAP has come to the conclusion that the difficulties and costs associated with on shore wind energy production greatly outweigh the benefits.

1.2 Stuart Young Consulting studied wind power generation over a 3 year period in Scotland. (It should be noted that the wind resource in Scotland is greater than that of Wales).

During the study period, wind generation was:

Below 20% of capacity more than half the time.

Below 10% of capacity over one third of the time.

Below 2.5% capacity for the equivalent of one day in twelve.

Below 1.25% capacity for the equivalent of just under one day a month.

The discovery that for one third of the time wind output was less than 10% of capacity, and often significantly less than 10%, was an unexpected result of the analysis. (Stuart Young Consulting, Analysis of UK Wind Power Generation, March 2011).

This low level of power generation cannot justify the expense to the economy and local environment.

1.3 In order to provide any substantial amount of power, wind turbines would have to be built over the entire land surface of the UK (Professor MacKay, *Sustainable Energy – without the hot air*, 2008).

1.4 In the UK we require around 60Gw of power at peak demand times. 35Gw is the base load, this is the load on the system that is always required.

Wind generation is unable to provide this base load because of its intermittent nature. The remaining 25-30Gw of power we require at peak times cannot be provided reliably by wind as the peak demand may occur when there is a low output from wind generation.

It will be seen therefore that wind power **cannot** provide any energy security for Wales or the UK (http://www.bmreports.com/bsp/bsp_home.htm)

1.5 The ROC subsidy was introduced to encourage renewable deployment; as a consequence, a wind turbine generates more in subsidies than in actual energy produced.

We believe that renewable deployment should be encouraged but the ROC should be adjusted so the payments are based not solely on the power produced but an emphasis given to when the power is produced.

This would encourage renewables that provide security of supply and power when it is required. This view is endorsed by Low Carbon Revolution, Welsh Assembly Government Energy Policy Statement, Annex 5:

‘Energy security of supply – since without this our civilisation is at risk’

1.6 Meeting the energy needs of Wales will require all wind power generation to have a back up supply, such as gas, coal or nuclear power generation. (S. Laidlaw, <http://www.thisismoney.co.uk/money/article-2008055/Energy-giants-want-billions-windfarms.html#ixzz1XuNiQ88M>)

This back up power, which is constantly being switched on and off, represents a highly inefficient use of resources.

Back-up will be required to be running all the time, Combined Cycle Gas Turbines (CCGT) are at least 60% efficient and produce 340 - 400kg CO² / Mwh.

Open Cycle Gas Turbines (OCGT) can be switched on and off but they produce around 575kgCO² / Mwh and are 35% efficient and therefore cost twice as much to run. (www.etsap.org)

The NG has noted that the gas piping system supplying gas power stations will be unable to cope with the constant pressure fluctuations arising from back up requirements to wind energy generation. (*Professor Michael Laughton, Wind Farm Conference, Cheshire 2011*)

It ultimately needs to be remembered that the wind turbines will not turn if there is no wind; no improvements in technology can alter this fact.

2. Devolution and Democratic Deficit

2.1 Following the referendum in 2011, it is now beyond doubt that the people of Wales wish further powers to be devolved to the Welsh Government. Energy policy is currently somewhat of a political football with decisions on energy matters being made both in Cardiff and in Westminster.

MAP has no position on where these decisions should be made but it is essential that the voices of local people are heard with regard to the future of their own communities.

It is a matter of grave concern that a situation may arise where the Westminster government localism agenda might protect communities in Shropshire from the blight associated with large scale electricity infrastructure whilst no such protection was available to residents of mid Wales.

The petitions presented to the Welsh Government relating to TAN8 and transport issue arising from wind farm development show the strength of local feeling. It is important for the gulf between people and policy makers to be bridged.

2.2 A comment from Dyfed Powys Police in relation to the proposed wind farm development at Dyfnant forest states:

Two other areas which we cannot ignore are the potential for an increase in crime levels in the area, and the risk of disorder and disquiet amongst residents of the areas where the farm will be sited, as well as those persons who live along or who use the anticipated access routes. The potential for public protest is growing; we are already seeing emerging themes and this should not be underestimated. (IPC Dyfnant Forest Scoping Opinion, June 2011).

In this atmosphere it is very urgent to resolve this uncertainty and to provide clarity on the decision making process.

The excuses of Westminster blaming Cardiff and visa versa, has caused nothing but despondency and cynicism amongst local constituents.

If the politicians in London and Cardiff cannot decide on who is accountable then the local communities are willing to assist.

3. Policy

3.1 Energy policy in Wales, as elsewhere in the EU is driven by the need to reduce carbon emissions. The question arises as to how these challenging targets are best achieved.

3.2 Too much government support is focused on expensive and still experimental, clean energy technologies which cannot provide large quantities of scaleable, secure, predictable and dispatchable power ó in particular on shore wind.

In comparison, more secure sources such as large hydro, Severn tidal barrage / tidal lagoons, geo-thermal etc. have been underfunded.

3.3 There has been very little emphasis on community energy generation projects, local energy for local needs.

Current onshore wind development plans in Wales are arousing wide spread and intense local opposition. The lack of local input in to power generation schemes renders these schemes unacceptable

Planning policy Wales states 3.1.8 "When determining planning applications local planning authorities must take into account any relevant view on planning matters expressed by neighbouring occupiers, local residents and any other third parties. While the substance of local views must be considered, the duty is to decide each case on its planning merits. The Courts have held that perceived fears of the public are a material planning consideration that should be taken into account in determining whether a proposed development would affect the amenity of an area and could amount to a good reason for a refusal of planning permission."

3.4 Research forming a major new independent report ó the UK National Ecosystem Assessment (UK NEA), reveals that nature is worth billions of pounds to the UK economy. The report strengthens the arguments for protecting and enhancing the environment and will be used by the government to direct policy in future.

- The benefits that inland wetlands bring to water quality are worth up to £1.5billion per year to the UK;
- Pollinators are worth £430million per year to British agriculture;
- The amenity benefits of living close to rivers, coasts and other wetlands is worth up to £1.3billion per year to the UK; and
- The health benefits of living with a view of a green space are worth up to £300 per person per year.

Source <http://www.defra.gov.uk/news/2011/06/02/hidden-value-of-nature-revealed>

4. TAN 8

TAN 8 impacts hugely on local communities and overrides established planning policy. Local opinion is ignored.

4.1 TAN 8 was issued in July 2005 with the stated aim of increasing renewable energy production whilst preserving the beauty of the Welsh landscape. To this end, Strategic Search Areas (SSA) were designated across Wales where it was deemed suitable for onshore wind farm development.

4.2 At this early stage, however, it was noted that concentration of turbines would effectively create turbine landscapes. This was based on the assumption that the turbines would be 110m tall. Current plans include 184m high turbines, totally out of scale to the landscapes of mid Wales.

4.3 TAN 8 was also issued when it was assumed that wind would be a much more efficient energy source than has proved to be the case, (see section 1 above).

4.4 Large scale infrastructure development (transformers and pylons) in mid Wales was not anticipated but with 3 out of the 7 SSA's in being concentrated in this area, such an industrial scale development is inevitable.

4.5 TAN 8 has not been subject to an environmental impact assessment which contradicts many EU and government policies, for example:

EU Directive on the Assessment of the Effects of Certain Plans and Programmes on the Environment (2001/42/EC) (the Strategic Environmental Assessment (SEA) Directive).

It was stated in the document 'One Wales 2007' that such assessments would be undertaken.

4.6 There is no mention in TAN8 of the fire risk imposed by wind turbines. This could equally be applied to forestry areas and dry moorland. Wind turbines have on occasion ignited, risking surrounding areas. (See Exhibit 1, attached).

4.7 Of particular concern are the cumulative impacts of **ALL** the proposed developments, (wind turbines, substations and pylons as a collective).

The effects of

- Draining upland moorland on flooding
- Regional displacements of populations of birds and bats
- Noise impacts in the form of resonance between wind farms
- Overall visual impact and effect on visual amenity
- Overall Impact on ecology - this view is echoed by Montgomeryshire Wildlife Trust (MWT) -Trusts have long been concerned about the cumulative effect of large-scale wind farm development and with many upland areas of Mid-Wales already covered with wind farms, the impact of hundreds more turbines is likely to be significant. To date, there has also been widespread failure of the mitigation measures connected with large-scale wind farms to compensate for the loss of key species and habitats (MWT, Position statement 2011, <http://www.montwt.co.uk/images/user/Position%20statement%20-%20Large%20windfarms.pdf>)

The MWT is also concerned about the implications of TAN8.

The Trusts question the wisdom of:

Éconcentrating wind farms into defined areas that are remote from sources of demand
Élocating large-scale wind farms in areas not served by, or in proximity to, existing infrastructure

Éso great an emphasis being placed on wind power as the primary form of renewable energy

4.8 It would appear that TAN8, 2.5 is open to misinterpretation by developers allowing over development in SSAø and surrounding areas.

‘There may be practical, technical and or environmental reasons why the capacity may be more or less than that indicated’

4.9 TAN8 2.10 *‘The de-commissioning of wind farm development and the restoration of the site at the end of its life and ensuring that sufficient finance is available to implement these requirements’* is part of policy. Please could the committee ensure that the same requirements cover the infrastructure and detail how this would be enforced.

In light of the above points, it will be seen that this policy of concentrating industrial scale turbine development in certain areas of Wales has failed and TAN8 should therefore be urgently reviewed.

5. Infrastructure and Transport Issues

5.1 To facilitate the proposed wind farm developments, a network of high voltage lines, pylons and substations, some 20 acres in size will have to be built. The construction of this infrastructure would materially alter the fabric of the mid Wales landscape.

5.2 The value of this landscape to the economy of the area will be discussed in the following section; there is wide-spread local discontent at the prospect of so far-reaching a change taking place without local consent.

5.3 With regards to the transport issues, the current road network is incapable of accommodating the traffic associated with the proposed developments. A study commissioned by PCC stated an increase of 401,633 HGV movements plus over 3,000 abnormal loads (Capita Symonds, Powys Wind Farms, Construction and Use HGVø Study, 2011).

Although the initial phase of development would create the greatest disruption, maintenance, repowering and decommissioning would have implications for traffic flow over a greater period of time.

Restrictions in the local road network due to the various works arising from the wind farm developments would seriously impede local businesses. Again this is referred to in the following section.

6. Socio Economic Impact on the Local Communities

6.1 The economy of mid Wales contains few large employers and is heavily dependent on tourism.

Mid Wales is unique because it is located between two national parks, this situation has led to the development of a thriving holiday and touring park sector in mid Wales. Tourism generates £615 million per year, employing 6300 people, 10% of the population (Powys County Council, 2009).

The fragile but sustainable economy of mid Wales is heavily reliant on tourism.

Tourism is a key provider of local jobs for local people, therefore helping to sustain local services, such as schools within rural communities.

Some wind farm developers are keen to promote 'turbine tourism' however the main asset of mid Wales is the unspoiled countryside. Industrialization of mid Wales with pylons, substations and large scale wind turbine developments would damage the natural beauty of the area resulting in damage to the local economy.

6.2 The British Holiday & Home Parks Association are extremely concerned regarding the scale and intensity of the proposed development;

'Intensive development of an industrial nature in countryside that is attractive to holidaymakers will impact on the economic, social and environmental contribution of Holiday and Touring Parks. This contribution may not be fully recognised and it is important that the detrimental impact is taken into consideration alongside any benefit anticipated from a development proposal.'

'The attractions of the countryside are the single most important driver in bringing park customers to any area. 81% of park customers enjoy walking, 61% spending

time in the countryside, 29% watching wildlife. Any development of an intense, industrial nature, which blights the very rural aspect of the countryside, will therefore greatly reduce the attractiveness of a park and a region to tourists. Therefore, any impact assessment considering proposals for development needs to take account of the loss of parks' very real contribution to the local economy and community.'
(Full report Attached, see Appendix A)

6.3 Visit Wales celebrates in 'Explore mid Wales and the Brecon Beacons' long distance paths through out mid Wales, including Glyndwr's Way and Offa's Dyke. These popular walks will be littered with pylons and turbines.

6.4 Some of the proposed wind farms are very close to the National Parks and their visual impact also needs to be considered, (see Snowdonia National Park Authority Contribution to IPC Scoping Opinion 2011).

6.5 Statements from One Wales document include:

'Through our Sustainable Tourism Framework, we will ensure that tourism maintains and strengthens the quality of life in local communities, through engaging and empowering local communities in planning and decision-making. We will aim to maximize the contribution of tourism to the sustainable economic prosperity of the host destination, including the proportion of visitor spending that is retained locally'
(One Wales p 64)

*'We wish to see the historic environment well protected, enjoyed and valued by the people of Wales. We want to see fewer historic buildings and sites 'at risk', with more heritage assets in stable or improving condition. We will continue to consider heritage assets for protection and promote the historic environment as a strand of regeneration and sustainable development, by promoting best practice in urban and landscape characterization and the reuse of redundant historic buildings. We will also expand our advice and policy guidance and target grants to promote sustainable conservation and heritage-led regeneration.
Through our Strategic Capital Investment Fund, we will fund improved access and presentation of historic sites to stimulate local pride and cultural tourism, as part of our Welsh Cultural Heritage Initiative.'* (Page 71 One Wales).

Planning Policy Wales 11.1.7

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

How will industrial scale development contribute towards these aspirations?

6.6 The threat of high voltage overhead lines has broader implications than just tourism. For example, small village schools will struggle to remain open if they are in close proximity to 400Kv lines due to the perceived health risks associated with them. Many of these small village schools are strongholds of the Welsh language: their closure would have a seriously detrimental impact on the traditional culture.

6.7 Children with Leukaemia Society argues that there should be a minimum distance from high voltage lines: The Draper Report of 2005 shows a 69% increase in childhood leukaemia within 200m of high voltage lines. (G. Draper et al., BMJ, 2005, 'Childhood cancer in relation to distance from high voltage power lines in England and Wales: a case-control study')

6.8 Recently, the Council of Europe produced a report into the health aspects of electromagnetic radiation:

'The potential health effects of the very low frequency of electromagnetic fields surrounding power lines and electrical devices are the subject of ongoing research and a significant amount of public debate. According to the World Health Organisation, electromagnetic fields of all frequencies represent one of the most common and fastest growing environmental influences, about which anxiety and speculation are spreading.'

'The Assembly regrets that, despite calls for the respect of the precautionary principle and despite all the recommendations, declarations and a number of statutory and legislative advances, there is still a lack of reaction to known or emerging environmental and health risks and virtually systematic delays in adopting and implementing effective preventive measures'.

<http://assembly.coe.int/main.asp?Link=/documents/workingdocs/doc11/edoc12608.htm>

6.9 Another consideration for the local communities is noise. The only assessment of wind turbine generated noise is based on a 14year old study (ETSU-R 1997) that requires the turbine manufactures to supply their own data for the environmental impact assessment and when wind turbines were significantly smaller than today.

6.10 TAN8 recommends a distance of 500m between wind turbines and homes but then advises that this could altered, i.e. lowered. The House of Lords are currently trying to pass a Bill to resolve this issue which would lead to turbines in mid Wales being sited over 3km from a dwelling.

6.11 There will also be devaluation of domestic and business properties which will leave many residents in a negative equity situation. This will have a knock-on effect on the wider business sector as asset devaluation decreases capital available for investment.

6.12 The suggested employment benefits from large scale wind farm development in mid Wales are very uncertain.

A study last year by the Juan Carlos University came to the conclusion that for every 'green' job that was created there would be a net loss of at least 2.2 jobs, i.e. for every 4 jobs created there would be a loss of 9 jobs in the general economy.
(<http://www.juandemariana.org/pdf/090327-employment-public-aid-renewable.pdf>)

Similarly, Dr G Hughes, Professor of Economics at Edinburgh University has demonstrated that the inability of this sector to create jobs.
(http://www.thegwpf.org/images/stories/gwpcf-reports/hughes-green_jobs.pdf)

6.13 Increased fuel poverty seems to be inevitable when heavily subsidizing on shore wind energy generation.

Wind Power stations have the net effect of transferring money from the poor to the rich. (<http://www.telegraph.co.uk/earth/energy/windpower/8713128/The-aristocrats-cashing-in-on-Britains-wind-farm-subsidies.html>).

A few landowners and international power companies benefit from the installation of wind farms, whereas the vast majority of the population pay. There is no community benefit for the people who have to suffer the intrusion of huge steel pylons or substations.

The cost of the electricity generated by the wind power stations is an extra 4.8p/Kwh on top of the normal unit price. This renewable policy is estimated to cost the UK £6.5 - 9 billion per year by 2020. (*ROC subsidy DECC passim*)

This is the money paid by the consumer to the landowners and power companies. By forcing up electricity prices and fuelling inflation, it will also reduce the amount of disposable income in the average household, resulting in less spending in the general economy.

In July 2011 DECC survey showed 5.5million homes currently are suffering fuel poverty.

6.14 Ironically constraint payments for switching off wind turbines when they produce too much electricity will only add additional costs to electric bills. (<http://www.telegraph.co.uk/earth/energy/windpower/8770937/Wind-farm-paid-1.2-million-to-produce-no-electricity.html>).

6.15 The subsidy in the year April 2009 to March 2010 amounted to £57,000 per wind power employee, which is greatly in excess of the average earnings in the public (£29,000) or private (£25,000) sectors. (*Constable, The Green Mirage, 2011*)

6.16 Further costs are incurred by the consumer due to the installation of new infrastructure in remote areas far from the point of use.

6.17 Wales has less than 5% of population of the UK but produces nearly 17% of the UK power needs we have installed capacity of 10,2GW (Welsh Assembly Government Energy Policy Statement-Technical annex 1). It would seem reasonable to say that there is an unfair burden on Wales for power generation.

6.18 Local truly community based power generation would elevate the need for additional infrastructure and therefore reduce costs to the consumer

7. Carbon Reduction

7.1 The driver behind renewable energy sources is carbon reduction which begs the question how effective is large scale on shore wind farm development in reducing carbon emissions?

7.2 The felling of large areas of woodland to site turbines would seem to be counter productive in this aim as trees absorb carbon from the atmosphere.

7.3 The new generation of larger wind turbines present particular problems when located in upland areas. In order to remain upright on boggy sites, extensive draining is required leading to wide spread degradation of carbon storing peat and dark soils.

7.4 Wind turbines are currently part of a global trading system with material and components travelling 1000's of miles to reach erection sites. This is clearly carbon intensive.

7.5 The figures relating to CO² emission reduction using wind turbines have been provided by Renewable UK. These figures, however, have been halved from their initial estimates. The amount of carbon they save has been downgraded from 0.86tonne CO²/Mwh to 0.43tonne CO²/Mwh.

7.6 The UK currently produces around 500 million tonnes per annum from a global 30 Billion tonnes (DECC).

Wales's reduction of CO² gases was 23% in 2009. Emissions totalled 42.6Mt of CO² (WAG).

This is 8.2% of the UK emissions and 0.14% of the worlds CO².

A reduction of 3% of CO² per year over the next 10years would reduce the CO² savings to 6.2% of the UK emissions and 0.12% of the worlds CO².

7.7 As wind turbines only generate electricity for 75-80% of the time the remaining 20% of the time they are consuming electricity around 70Kw for a 3Mw machine (General Specification, Vestas V90 3MW pdf., p34 9.11) this must be taken into account when assessing possible CO₂ savings. In fact the central range of 13Gw of onshore wind by 2020

(UK renewable energy roadmap,

http://www.decc.gov.uk/en/content/cms/meeting_energy/renewable_ener/re_roadmap/re_roadmap.aspx) would suggest a power consumption for the whole on shore fleet at around 300Mw- the size of a small gas fired power station. This fact must be taken into account when deciding how much CO₂ is saved by Wind Turbines.

Conclusion

The people of Montgomeryshire do not accept the large scale industrialisation of their landscape for no good purpose, recognising the following deleterious consequences of such policies:

- Destruction of a beautiful landscape which is an economic asset
- Generation of small amounts of unreliable energy
- Massive cost both to the general economy and to consumers ó more fuel poverty
- UK government subsidies going to large international companies and wealthy British land owners
- Negligible carbon savings
- Deleterious impact on local flora and fauna, especially birds and bats
- Increased flooding risks
- Devaluation of property and businesses
- Unacceptable impact on rural communities, including schools and Welsh language
- Reduction in the visual amenity leading to reduction in tourism visitors to the area
- Widespread disruption to the local transport network leading to disinvestment, economic stagnation and unemployment

Exhibit 1







*The representative body of the parks industry including
caravans, chalets, lodges, park homes, tents and
all types of self catering accommodation.*



**BRITISH HOLIDAY
& HOME PARKS
ASSOCIATION LTD**

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19 August 2011

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Dear Richard,

**Rural Development
Contribution of Holiday and Touring Parks**

The BH&HPA Board of Directors was concerned by your report of the proposals for intensive wind farm development in Montgomeryshire, to include not only turbines, but also pylons, overhead cables and sub-stations to distribute the energy generated.

Intensive development of an industrial nature in countryside that is attractive to holidaymakers will impact on the economic, social and environmental contribution of Holiday and Touring Parks. This contribution may not be fully recognised and it is important that the detrimental impact is taken into consideration alongside any benefit anticipated from a development proposal.

A Holiday or Touring Park's contribution will be economic, social and environmental. It will include:

- jobs that are sustained, both directly in the park business and indirectly in the locality
- the market created for local goods and services thereby supporting local businesses (shops, pub houses, attractions. ... even bus services) which remain viable through the patronage of park customers
- trade (and employment) for local businesses that work on parks (tradesmen, suppliers, plumbers and electricians: all who trade with the park)
- on-park facilities, such as a shop or swimming pool, which are available for local users and whose absence would be sorely missed
- conservation and biodiversity work on the park and in its surroundings
- involvement in local causes and educational projects
- the wellbeing of park customers and its important role in reinforcing family life
- maintenance of environmental assets, such as footpaths and beaches.

Park owners have a proven track record of protecting and enhancing the natural environment and, equally importantly, they provide a market for local goods and services and facilities that are often extended to their host communities. Parks create jobs in rural communities and their customers' patronage is often fundamental to the viability of marginal local businesses.



INVESTOR IN PEOPLE

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Member, European Federation
of Campsite Organisations
& Holiday Park Association

Registered Office - as above. Registered No 713398 England.

It is important that these essential contributions are taken into consideration by the planning authorities. The following pages provide some facts and figures (and their sources) which it is important that BH&HPA Mid Wales members whose park businesses will be blighted communicate in the consultation on the proposed development.

The attractions of the countryside are the single most important driver in bringing park customers to any area¹. 81% of park customers enjoy walking, 61% spending time in the countryside, 29% watching wildlife. Any development of an intense, industrial nature which blights the very rural aspect of the countryside will therefore greatly reduce the attractiveness of a park and a region to tourists. Therefore, any impact assessment considering proposals for development needs to take account of the loss of parks' very real contribution to the local economy and community.

With every good wish,



Ros Pritchard OBE
Director General

Contribution of Holiday and Touring Parks

Tourist Statistics

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

Tourism data are gathered by the United Kingdom Tourism Survey (UKTSⁱⁱⁱ) which recorded that in 2010, the parks industry accounted for:

- 15% of all UK tourism trips (18.1m)
- 21% of all UK tourism nights (77.2m)
- 13% of all tourist spend (£2.674b).

Economic Contribution

Caravan Holiday Homes

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

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

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

	Annual economic contribution per caravan holiday home pitch	
Annual pitch occupancy	From £	To £
20 weeks	£11,007	£17,138
25 weeks	£13,759	£21,424
30 weeks	£16,510	£25,708

Touring Caravans

The Camping & Caravanning Club places the average daily spend in the local community per touring pitch, **excluding** site fees, as £31.91^{vi}.

2010 research^{vii} amongst touring consumers who participate in the BH&HPA rate-this-park consumer panel indicates that the average spend per night for an occupied touring pitch is £72.17. (The study asked holidaymakers about their spend on items such as accommodation, travel, car parking, groceries, eating and drinking out, activities, attractions, capital items and other shopping.) The annual economic contribution can be calculated if pitch occupancy is considered.

	Annual economic contribution per touring pitch
Pitch occupancy	£
20 weeks	£10,104
25 weeks	£12,630
30 weeks	£15,156

Direct Employment

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

Two statistical classifications are particularly relevant to the parks industry:

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

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

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

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

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

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

Indirect Employment

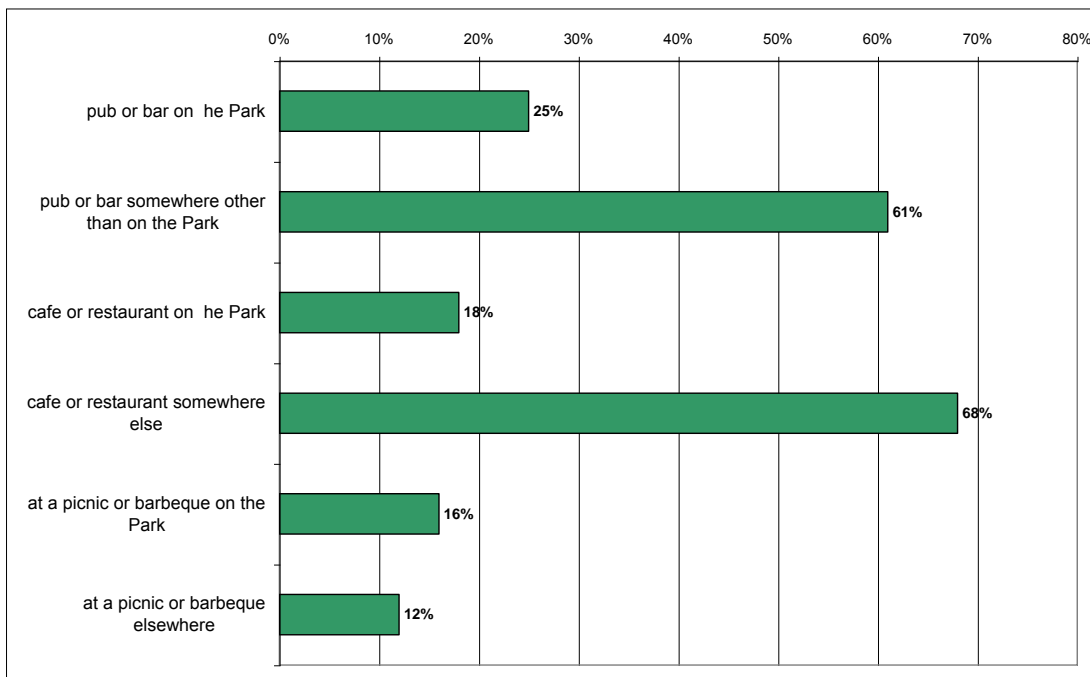
A 2001 study reported that every two caravan holiday home pitches account for one tourism job^x.

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

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

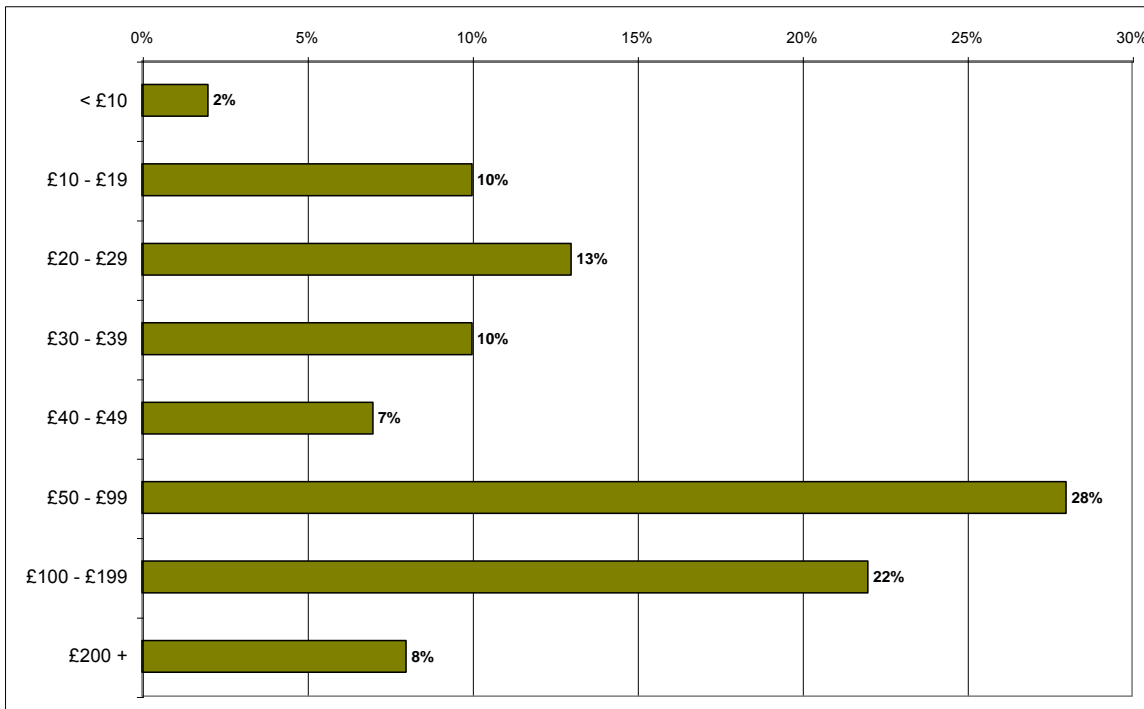
Park customers eating out

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

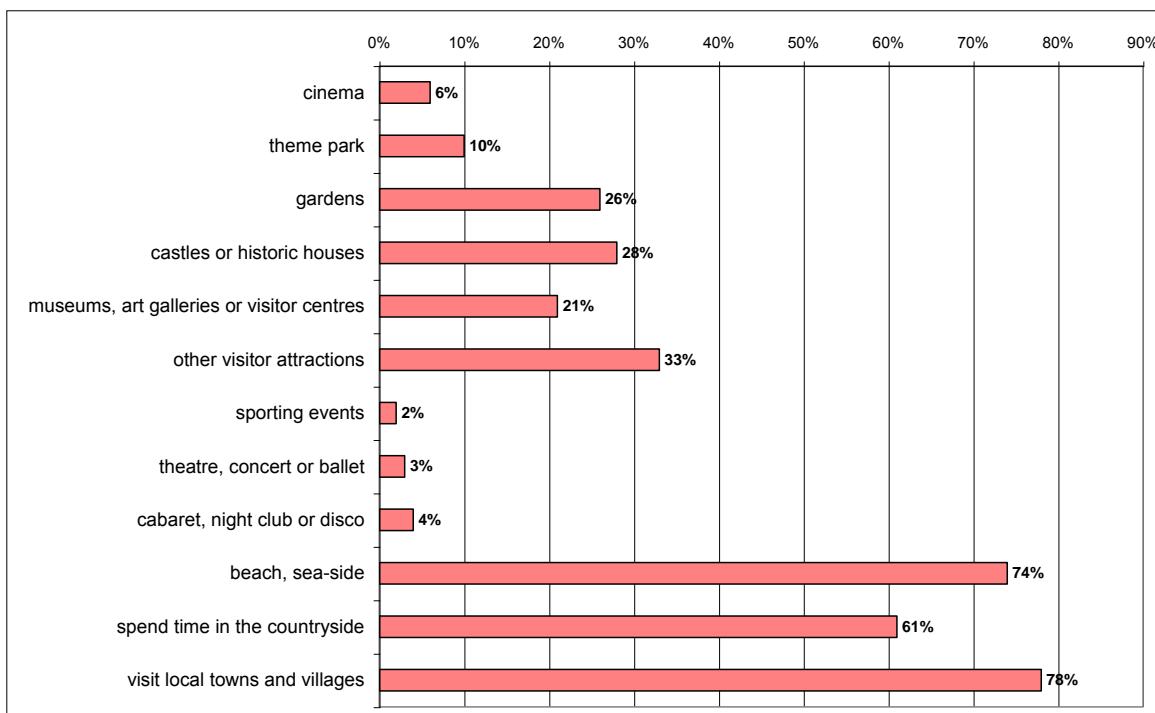


Spend by park customers on non-food shopping

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



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



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

Caravans: a UK manufacturing industry

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

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

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

UK touring caravan sales

2008-2009	20,992
2009-2010	24,464
2010-2011	24,548

UK caravan holiday home sales

2008-2009	13,064
2009-2010	17,063
2010-2011	16,319

UK motorhome registrations

2008-2009	8,533
2009-2010	7,163
2010-2011	7,630

Sources

ⁱ 'Economic Contribution' December 2010, BH&HPA Research Report for the Rate-this-park consumer panel

ⁱⁱ 59.5% of the UK population stated that they had 'ever spent' a camping/caravanning holiday. 'Camping & Caravanning' research conducted for the European Commission by GFK Marktforschung GMBH & Co.kg (1989)

ⁱⁱⁱ United Kingdom Tourist Statistics 2010. www.visitengland.org

TRIPS		
	%	No.
Holiday camp/village self-catering	1.24	1,480,000
Camping	3.91	4,670,000
Touring caravan/motorhome	3.98	4,750,000
CHH Letting	3.21	3,830,000
CHH privately owned	2.83	3,380,000
TOTAL	15.16	18,110,000

NIGHTS		
	%	No.
Holiday camp/village self-catering	1.70	6,350,000
Camping	4.26	15,900,000
Touring caravan/motorhome	5.78	21,580,000
CHH Letting	5.18	19,350,000
CHH privately owned	3.76	14,040,000
TOTAL	20.68	77,220,000

SPEND		
	UK	
	%	£
Holiday camp/village self-catering	1.58	330,000,000
Camping	2.63	548,000,000
Touring caravan/motorhome	3.15	656,000,000
CHH Letting	3.87	806,000,000
CHH privately owned	1.60	334,000,000
TOTAL	12.83	2,674,000,000

^{iv} RPI from October 2003 to October 2009 applied to figures derived from 'Caravan Holiday Homes in Wales', The Tourism Company 2003, Wales Tourist Board and BH&HPA

^v December 2010, BH&HPA Research amongst the Rate-this-park consumer panel

^{vi} RPI from October 2007 to October 2009 applied to figures derived from 'Spend in the Local Community Summary Report', Camping and Caravanning Club - Easter and Summer Results 2007

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- vii December 2010, BH&HPA Research amongst the Rate-this-park consumer panel
- viii *'Economic Contribution of UK hospitality industry'*, Oxford Economics, September 2010 www.bha.org.uk/wp-content/uploads/2010/10/BHA-Economic-Contribution-of-UK-Hospitality-Industry-Final-.pdf
- ix *'Caravan Holiday Homes in Wales'*, The Tourism Company 2003, Wales Tourist Board and BH&HPA
- x *'Holiday Parks - Your value to the local community'*, Ian Butter, BH&HPA Journal, March-April 2001
- xi *'Spend in the Local Community - Summary Report'*, Camping and Caravanning Club - Easter and Summer Results 2007
- xii *'Economic Contribution'* December 2010, BH&HPA Research Report for the Rate-this-park consumer panel
- xiii *'The Business'*, National Caravan Council, Autumn 2011