

5789/2155/S1

Ack

From: Ruth Bryan r.bryan@mtcp.com
Sent: 27 April 2015 16:45
To: Local Plan Review
Subject: Local Plan Review Representation
Attachments: Example Camping Pod.jpg; Representation Letter.pdf; Site Location Plan.pdf; Site Plan.pdf; ATT00001.txt

Dear Sirs,

Please find attached our representation to the Local Plan Review on behalf of the Caravan Club.

Should you have any queries please do not to hesitate to contact me.

Kind Regards

Ruth

Ruth Bryan MTCP
Graduate
Planning

5789 / 2156 / S14
 5789 / 2157 / DM1
 5789 / 2158 / DM18
 5789 / 2159 / DM22



27 April 2015



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Dear Sirs

Representation to the Mid Devon Local Plan Review Consultation on behalf of the Caravan Club

This letter accompanies our representation to the Local Plan Review with regard to Exebridge Lakeside Caravan Club, Higher Grants, Exebridge, Dulverton, Somerset, TA22 9BE. This representation is accompanied by a site location plan, site plan and example of "camping pod" design.

Exebridge Lakeside Caravan Club Site is located south of the settlement of Exebridge and to the west of the A396. The site has an area of approximately 4.3ha and currently has a total of 80 pitches, 30 of which are hardstanding and also further space for the storage of 20 caravans. The site also incorporates a site shop, information room, games room, toilet and shower block and laundry. The site is connected by a number of internal tarmac roads and is surrounded by mature hedgerows and trees.

National Planning Policy

The National Planning Policy Framework was published in 2012 and sets out overarching planning guidance. The key message of the NPPF is the **presumption in favour of sustainable development** which should be seen as a "golden thread" running through both plan making and decision taking. There are three elements of sustainable development which should not be considered in isolation which are:

- **Economic Role** – contributing to building a strong, responsive and competitive economy by ensuring sufficient land of the right type is available in the right places and at the right time to support growth and innovation;
- **Social Role** – supporting strong, vibrant and healthy communities;
- **Environmental Role** – contributing to protecting and enhancing our natural, built and historic environment.

The NPPF sets out 12 core planning principles including:

- Proactively drive and support sustainable economic development to deliver the homes, businesses, industrial units, infrastructure and thriving local places that the country needs;
- Take account of the different roles and character of different area...recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it
- Contribute to conserving and enhancing the natural environment and reducing pollution;

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- Actively manage patterns of growth to make fullest possible use of public transport, walking and cycling.

Section 3 of the NPPF relates to **Supporting a Prosperous Rural Economy** and sets out that “planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development”. In order to achieve this local and neighbourhood plans should:

- Support the sustainable growth and expansion of all types of businesses and enterprises in rural areas;
- Promote the development and diversification of agricultural land other land based rural businesses;
- Support sustainable rural tourism development that benefits businesses in rural areas, communities and visitors and which respects the character of the countryside, This should include supporting the provision and expansion of tourist and visitor facilities where identified needs are not met by existing facilities in rural service centres;
- Promote the retention and development of local services and community facilities in villages such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.

Local Plan Review Policies

Policy S1 – Sustainable Development Priorities

This policy sets out a number of strategic priorities which will need to be achieved to deliver the vision for the District and to address key issues. Of key relevance to this site are:

- Building a strong competitive economy through access to education, training and jobs, infrastructure, the creation of new enterprise, economic regeneration and flexibility of uses to respond to changing circumstances;
- Supporting a prosperous rural economy through the conversion of suitable existing buildings and well designed new buildings in suitable locations, diversification of agricultural and other land based businesses, support for equestrian activities, retention and development of local services and community facilities in villages and the promotion of sustainable rural tourism and leisure development;
- Promoting sustainable transport by delivering appropriate infrastructure, reducing the need to travel by car, integrating public transport and other forms of sustainable travel such as walking and cycling and providing safe environments while recognising Mid Devon's rural locality;
- Requiring good sustainable design that respects local character, heritage, surroundings and materials, creates safe and accessible environments, designs out crime and establishes a strong sense of place.

Policy S14 – Countryside

Development outside the settlements defined, will preserve and where possible enhance the character, appearance and biodiversity of the countryside while promoting sustainable diversification of the rural economy. Detailed development management policies will permit agricultural and other appropriate rural uses, subject to the following relevant criteria:

- Appropriately scaled retail, employment, farm diversification, tourism and leisure related development (including appropriate conversion of existing buildings);

Policy DM1 – High Quality Design

Designs of new development must be of high quality, based upon and demonstrating the following principles:

- Clear understanding of the characteristics of the site, its wider context and the surrounding area;
- Efficient and effective use of the site;

- Positive contribution to local character including any heritage or biodiversity assets and the setting of heritage assets;
- Creation of safe and accessible places that also encourage sustainable modes of travel such as walking and cycling;
- Visually attractive spaces that are well integrated with surrounding buildings, streets and landscapes and do not have an unacceptably adverse effect on the privacy and amenity of the proposed or neighbouring properties and uses, taking account of:
 - Architecture;
 - Siting, layout, scale and massing;
 - Orientation and fenestration;
 - Materials, landscaping and green infrastructure;
- Appropriate drainage including sustainable drainage systems.

Policy DM18 – Rural Employment Development

In countryside locations, planning permission will be granted for new build employment development or expansion of existing businesses, provided that the development is of an appropriate use and scale for its location. Proposal must demonstrate that:

- The development would not lead to an unacceptable impact on the local road network;
- There would not be an unacceptable adverse impact to the character and appearance of the countryside; and
- There are insufficient suitable sites or premises in the immediate area to meet the needs of the proposal.

Policy DM22 – Tourism and Leisure Development

Proposal for new or expanded tourism, visitor or leisure facilities will be supported within or adjacent to defined settlements. Elsewhere the nature of the proposed development must justify a countryside location and minimise environmental impact, avoiding an unacceptable traffic impact on the local road network. Development proposal must:

- Respect the character and appearance of the location;
- Where possible involve conversion or replacement of existing buildings; and
- Demonstrate that the need is not met by existing provision within nearby settlements

Recommendations

It is positive that the Local Plan Review acknowledges the importance of tourism in the District, and its contribution to the rural economy. Maintaining and enhancing a prosperous rural economy and the *"promotion of sustainable rural tourism"* is a strategic priority set out in Policy S1. As part of Policy DM18 the Council states that they *"recognise the importance of retaining and providing rural employment opportunities outside settlement limits as a means of ensuring a diverse and healthy rural economy"*. Tourism is identified as an employment activity that can be accommodated in countryside locations without *"any adverse effects upon the character of Mid Devon's rural areas or existing development"* (para 4.56).

Policy DM22 which relates specifically to Tourism Development and further acknowledges the important role tourism has in generating incomes for local residents (para 4.66). The policy aims to ensure that tourism development, which is generally welcomed, does not have a negative impact on the surrounding area and so seeks to locate development within or close to defined settlements where local shops and facilities are more accessible and stand to benefit from the tourism development (para 4.67).

The Council have set out that all development of this type in the countryside will need to be justified requiring a marketing strategy, business plan and evidence that the need is not being met by existing provision. It must be demonstrated that a developments benefits outweigh any harm and that they do not impact on the local

road network (para 4.68). The policy goes on to say that the evidence needed to support countryside location should be *"proportionate to the scale and nature of the tourism proposal being considered"*.

The acknowledgement of the importance of the tourism economy in rural areas and the Local Plan Review's general support of appropriate sustainable tourism development is supported by the Caravan Club. However Policy DM22 is overly restrictive on development of existing tourist sites and also sets no guidance of the Council's position on conversion of accommodation type.

The policy is particularly restrictive on the extension of existing caravan sites which are located in the countryside and are not directly adjacent to an identified settlement. The justification for this restriction is that tourism development should be located in a sustainable location next to a settlement which can benefit from the tourism trade. It is felt that this policy does not allow sufficient flexibility and does not consider site specific circumstances that may be present. Notably the appropriate evolution of existing sites to meet modern standards.

Exebridge Lakeside Caravan Club is a sustainable location for tourism development and the potential further extension and diversification in accommodation on the site would be beneficial to the tourism industry in the area. The Caravan Club wish to extend the site to the west, an area which is currently used for dog walking and this would include extension of existing internal roads and providing new areas of hardstanding. Given the changing nature of customer needs in the tourism industry the Caravan Club also want to provide "camping pods" on this site, these are small typically wooden structures which incorporate a small bedroom, bathroom and cooking area (please refer to image provided).

Under policy DM22 it is unclear whether this extension to the site and the diversification in accommodation type would be acceptable. This site is considered to be appropriate for this type of development given as the site has good public transport connections with a bus stop 300m from the site entrance which provides services to Tiverton, Bampton, Morebath, Dulverton, Minehead Hospital, Minehead Railway Station. The site also has excellent walking and cycling facilities so visitors have a wide ranging choice of sustainable transport modes. The site is 3.5km from Bampton, 4km from Dulverton and 14km from Tiverton and all of these settlements can be reached using sustainable transport.

The site is very well screened from the surrounding area being bounded by substantial mature hedgerows and trees. This minimises the impact of any future development on the surrounding properties and the environment. Given the amount of development currently on the site including existing buildings and hardstanding the site is considered to be previously developed and therefore development on a site such as this should be prioritised. The extension of this site including and provision "camping pods" would not have an unacceptable impact on the local road network, would not have a negative impact on the environment however would increase employment and visitor spending in the local area.

The extension and diversification of this site will allow for the Caravan Club to remain economically viable and meet the changing needs of visitors. If Local Plan policies are overly restrictive this may lead to this and other caravan and camping sites to no longer be viable, which could have a severe impact on the wider rural tourism economy. The requirement of policy DM22 to in some cases provide a Business Plan and Marketing Strategy is considered to be overly demanding on businesses particularly for existing businesses where an establish use and demand is already present. We consider greater flexibility in the process is required.

Policy DM22 should be more flexible in allowing existing tourism accommodation sites to diversify, extend and adapt to changing economic circumstances and demands. This will allow for this type of tourist development to continue to thrive in the District and support the rural economy in line with both national and local planning policy including emerging policy S1 of the Local Plan Review.



Yours faithfully



Duncan Parr BA DUPI Dip TP FRGS MRTPI Cgeog MEWI
Director



Exebridge Lakeside Caravan Club Site, Higher Grants, Exebridge, TA22 9BE

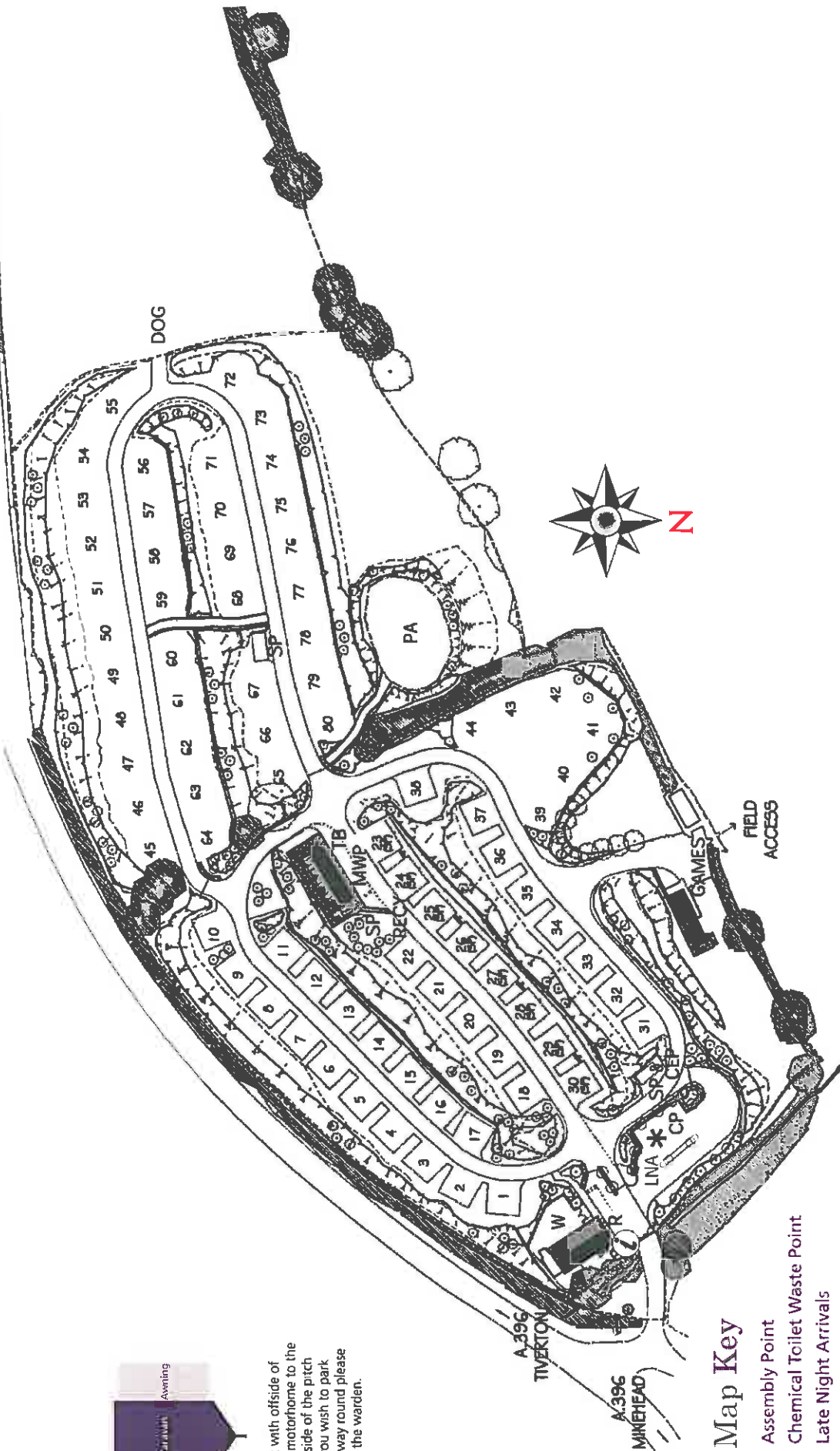


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Exebridge Lakeside Caravan Club Site



Please park with offside of caravan or motorhome to the numbered side of the pitch marker. If you wish to park a different way round please check with the warden.

Site Map Key

- * Assembly Point
- CEP Chemical Toilet Waste Point
- LNA Late Night Arrivals
- MWP Motorhome Waste Point
- PA Play Area
- R Reception
- RECY Recycling Area
- Information Room
- DOG Dog Walk

Pitch Guide

Service Point	Pitch type	Peg colour	Pitch numbers
SP	Standard with awning	White	1 - 22, 31 - 80
(SP)	Super/Service	Red	23 - 30
TB			
W			

