

AT/LWJ/2659-13/LPA

14 December, 2016

Please reply to our office in: **Kendal**

Transmission by email only to: developmentplans@southlakeland.gov.uk

Development Plans Team
South Lakeland District Council
South Lakeland House
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Dear Sirs

Arnside Silverdale AONB Development Plan Document Draft for Consultation November 2016

I am writing on behalf of Holgates Caravan Parks who, as you will be aware, have very significant facilities within the Arnside & Silverdale AONB at Far Arnside in particular and employ approximately 135.

The key business interests are the camping and caravanning site at Far Arnside, Hollins Farm and also the larger Holgates site on Cove Road at Silverdale. Both are significant facilities and the Cove Road facility has been subject to considerable investment in recent years, including additions to the accommodation at the site as well as a new swimming pool, alterations to the reception and the addition of a bowling alley. All the work has been carried out in a very sympathetic manner and has added significantly to the economic and employment opportunities within the AONB.

With regard to the facilities I would also point out that they are increasingly being used and enjoyed by local people who live within the AONB, so they are providing a service to the local community that would not otherwise be provided without the gravity of scale that visitors to the area add to enable these facilities to be viable in economic terms.

My client has a particular concern regarding section 4.8 of the plan which relates to "Camping, Caravan and Visitor Accommodation". It is known that there have been concerns about caravan and camping development within the AONB and it is noted at the first part of the proposed policy AS12 it is stated that caravan and visitor accommodation will not be permitted for new static or touring caravan sites, wooden chalets, cabins or lodges or the expansion of existing sites in order to conserve the landscape character, scenic beauty and special qualities of the AONB. With regard to this it is argued that each case should be dealt with on its merits and, as set out above, my client's

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sites have assimilated well into the landscape and the quality of the surrounding landscape is something that is emphasised in all of the proposals put forward by Holgates. This ensures that the sites are attractive to visitors. It appears that in effect the policy is a ban on static caravans, chalets, cabins or lodges within the AONB.

The second criteria considers that small scale proposals for tented camping and other low impact visitor accommodation such as pods, huts and yurts may be supported within in existing caravan and camping sites. The policy goes on to note that proposals should be within the screened footprint of the existing site. This part of the policy provides a safeguard to enable each proposal to be assessed on its merits. It is argued that this should also be the case for the first part of the policy in that not allowing anything within the first criteria severely limits my client's ability to grow what is one of the largest employers within the AONB.

The NPPF urges that planning policy should support economic growth in rural areas in order to create jobs and promote prosperity by taking a positive approach to sustainable new development. It is argued that it would be entirely sustainable for additional proposals within additional sites and these could be dealt with on a case by case basis in terms of how they affect the landscape.

The NPPF under paragraph 28 goes on to state that support should be given to the sustainable growth and expansion of all types of business and enterprise in rural areas and further points out that sustainable rural tourism and leisure developments that benefit businesses in rural areas should be supported. This makes the connection between communities and visitors so long as proposals respect the character of the countryside. It is argued that this is exactly the way in which my client's business has operated and expanded over the years, while still protecting the special qualities of the AONB.

In summary it is argued that policy AS12 at criteria (I) is too restrictive and it should read more like criteria (II), allowing some new development of static touring caravans, wooden chalets, cabins or lodges within existing sites where this causes no harm to the landscape because this is something that it has been proven can be done successfully by my client's previous proposals at his sites.

The justification for the policy admits to it being more restrictive towards the use of land for static caravans because of their unsuitable appearance within the landscape. However, the unsuitable appearance in the landscape can only be considered on a case by case basis and there are ample policies within the DPD as a whole to ensure that unsuitable schemes are rejected.

I trust that you will take this representation into account in your consideration of policy AS12.

Yours faithfully



Andrew Tait - BA (Hons) MA MRTPI

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