Our Ref: PPS1470

Date: 31 August 2021

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South Holland District Council
Council Offices
Priory Road
Spalding
Lincolnshire
PE11 2XE

Dear Sir/Madam

Town and Country Planning Act 1990.
Heron Cottage Camping & Caravanning, Frostley Gate, Holbeach, Spalding, PE12 8SR
Change of use of land for an extension to existing caravan site.

I hereby submit an application to change of use of land adjacent to Heron Cottage Camping & Caravanning, Frostley Gate, Holbeach.

The application comprises:

- Application form and Certificate of Ownership duly signed and dated;
- Site Location Plan 1470-0002-01;
- Block Plan 1470-0004-01;
- This letter;
- Flood Risk Assessment.

RPS Experience

RPS is one of the UK's leading providers of planning and environmental consultancy services to operators and developers of holiday accommodation providers, including hotels, self-catering apartments, lodges, caravans, glamping and camping. We are members of the trade body for Camping & Caravannings, the BH&HPA. From our work in this sector for 25 years, we have developed a good understanding of how councils and inspectors deal with occupancy issues and we also have a good understanding of the needs of operators and the need to be able to offer a flexible range of holiday options.

Planning History

Planning permission was granted for the use of land at Heron Cottage for a campsite for a maximum of nine caravans/tents for recreational purposes only in 1992 under H05/0546/92. Condition 4 limited the development to 9 caravans/tents on site at any one time.

In 1996, permission was granted for alterations/extension to the existing touring caravan/camping site and erection of an amenity block (H05/1107/96). Condition 4 limited the development to 28 caravans on site at any one time.

Permission was granted in 2008 for a further extension to the site and the creation of an additional 18 pitches (H05//0397/08). Condition 2 limited the development to 63 touring caravans/tents on site at any one

time. Condition 3 states that the touring caravans on site shall be used for holiday purposes only, and shall not be used as a person's sole or main residence. Condition 4 required the owner/operator to maintain an up to date register of the names of all owners/occupiers of individual caravans on site, together with their main home address and length of stay at any one time. No resections were placed on the period for which caravans could be occupied.

In 2010, permission was granted to replace aa caravans on site with 9 static caravans (H05/0612/10). This related to the caravans currently towards the northern tip of the Park. Condition 3 limited the development to no more than 9 static caravans on site at any one time. Condition 4 restricted the period of use to 1 April and 30 April in any one year and to holiday use only. Condition 5 required the keeping of a register of visitors, as previously.

Permission was then granted in 2013 of the proposed replacement of 19 touring/camping pitches to 16 static caravan pitches (H05/0862/13). This related to the caravans currently located towards the southern edge of the site. This was a full application which covered the whole of the caravan site. Condition 4 limited the development to 25 static caravans on site at any one time. Condition 5 restricted the use as holiday accommodation only not be occupied during the period 1 February to 28 February in any one year. Again, condition 6 required the owner/operator to keep a register of names and addresses of occupiers.

In 2015, permission was granted under Section 73 of the 1990 Act to vary condition 2 and 5 of H05-0862-13 (H05/0612/15) to allow a further 16 static caravan pitches, and was subject to the same conditions relating to holiday use only and period of occupancy.

A further application for static caravans along the north eastern boundary was approved in 2018 (H05-0852-18) and a Section 73 application to allow addition statics further to the north west along that boundary is currently pending (PP-08447454).

An application to vary conditions to allow all-year round occupation of the caravans on site is also currently awaiting determination (H05-1200-19).

Proposed Development

It is proposed to site 10 additional static caravans on land to the north/north east of the current site (as shown on daring no. 1470-0004-01). The caravans will be provided in linear form to broadly mirror the line of caravans approved as an extension to the Park in 2008. The further extended area will be laid out to model standards with scope for additional landscaping.

Planning Policy Context

Development Plan

The South East Lincolnshire Joint Strategic Planning Committee adopted the South East Lincolnshire Local Plan 2011-2036 (SELLP) on 8th March 2019. Policies 1 and 9 are relevant to the consideration of this application.

Policy 1 is the spatial strategy of the plan and states that in the countryside (where Heron Cottage is located) development will be permitted that is necessary to such a location and/or where it can be demonstrated that it meets the sustainable development needs of the area in terms of economic, community or environmental benefits.

Policy 9 states:

"Proposals for tourism and visitor development which utilise and enrich the natural and built environment and existing attractions of South East Lincolnshire to the benefit of the local economy, visitors and local communities will be supported within the boundaries of settlements identified in Policy 1.

Outside these settlements, small-scale development to support the visitor economy, including farm diversification, equine development and fishing lakes, will be supported provided that proposals:

1. do not conflict with neighbouring land uses;

2. are in keeping with the character of the locality; and

3. demonstrate a functional link with an existing rural attraction or farm enterprise.

Larger developments will only be supported outside settlement boundaries in

exceptional circumstances, for instance to proportionally support or enhance the enjoyment of an established visitor attraction where this cannot reasonably be achieved from a town or village location."

National Planning Policy Framework

Paragraphs 83 and 84 set out policies for supporting a prosperous rural economy. Paragraph 83 states that Planning policies and decisions should, among other things, enable the sustainable growth and expansion of all types of business in rural and sustainable rural tourism and leisure developments which respect the character of the countryside. Paragraph 84 states that planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.

Compliance with the development plan

In terms of Policy 1 of the SELLP, the development comprises a further modest extension to a well-established camping and caravan park. As noted in paragraph 4.4.1, Tourism is an important part of South East Lincolnshire's economy, generating £136.7million in 2012. Paragraph 4.4.3 goes on to acknowledge that tourist facilities can offer benefits to local communities directly through employment, and indirectly, such as by supporting local food producers, local shops, pubs and restaurants. Given the importance of tourism to the local economy, and given the wider social benefits of the proposal, it is considered that the development of additional static caravans broadly complies with Policy 1.

In terms of SELLP Policy 9 (which is in itself compliant with the NPPFs polices on supporting a prosperous rural economy), this relates specifically to Tourism and as paragraph 4.4.2 notes, seeks to ensure that a clearly differentiated tourism offer is established, to enable the area to compete better as a tourist destination. The development of 10 additional caravans is considered to be small-scale and thus coming under the scope of the second paragraph of Policy 9. As far as the three criteria of this policy are concerned, the development would not conflict with neighbouring land uses. The site is adjoined by agricultural land along the north/north eastern boundary and would continue to be so as a result of this development (criterion 1). There are a number of other static caravans on the site, and so the general character of the site would remain unchanged. Wider views of the site from the north are limited, and any views that are possible will be seen against the backdrop of the existing Caravan Park. It is proposed to further screen the site with a line of willow trees (criterion 2). While the existing site is neither a rural attraction or a farm enterprise, there will nevertheless be a clear functional link with the existing Caravan Park with a single point of access from the highway net work (criterion 3). The development therefore broadly complies with Policy 9 of the SELLP.

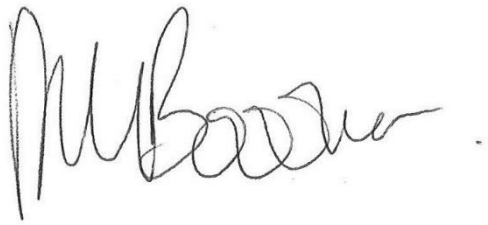
The application is accompanied by a Flood Risk Assessment. This concludes that the risk of flooding is lowered further due to the South Holland IDB high priority watercourses incorporating a significant freeboard. This provides storage during events greater than 2% annual probability (1 in 50 chance each year).

Conclusion

In overall conclusion, there is no need for the period of occupancy of the individual self-catering apartments at Heron Cottage to be restricted, as stipulated under the vacancy condition. Restricting it on this basis is contrary to the key policy and its supporting text in the Development Plan, and unnecessary and unreasonable judged against the tests in PPG, as the amended conditions will clearly state that the caravans can be used for holiday purposes only, along with a requirement to maintain a register of occupiers, will achieve the aim stated in the reasons given for the conditions. We have drawn attention to a number of appeal cases where the approach proposed by the Applicant has been tested by Inspectors and found to be reasonable.

Yours sincerely,

for RPS Consulting Services Ltd



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