

20 April 2015



Investment and Policy
Carlisle City Council
Civic Centre
Carlisle
Cumbria
CA3 8QG

Duncan Parr BA DUPI Dip TP FRGS MRTPI Cgeog
MEWI
E: dparr@savills.com
DL: +44 (0) 1732 789730
F: +44 (0) 1732 789777

74 High Street
Sevenoaks TN13 1JR
T: +44 (0) 1732 789 700
savills.com

Dear Sirs

Representation to the Carlisle District Local Plan 2015-2030 on behalf of the Caravan Club.

This letter accompanies our representation to the Carlisle District Local Plan, specifically relating to policy **EC10 – Caravan, Camping and Chalet Sites**. This representation is made on behalf of the Caravan Club with regard to Englethwaite Hall Caravan Club, Armathwaite, Carlisle, Cumbria, CA4 9SY. Included in this representation is a site location plan, site plan, completed representation form and example lodge and camping pods.

Englethwaite Hall Caravan Club is located approximately 2km east of the settlement of Cotehill and is situated within a wooded area. The site provides 68 pitches in total, 62 of which are hardstanding pitches for touring caravans, the site also provides 6 pitches for storage of caravans. The site includes a site shop and information room and a number of internal roads.

This site is in a rural location with the nearest bus stop located in Cotehill which provides services to Wetheral, Carlisle and Dalston. The site is well connected to an extensive walking route network including footpaths and national trails and also a number of cycle trails.

Due to the site being situated within a wooded area the site is very well screened and is not visible from the surrounding landscape.

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;
- 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.

Emerging Local Plan

The Carlisle District Local Plan 2015 acknowledges the “major importance” of tourism to Carlisle and its significant contribution to the districts economy and employment. The plan states that “*it is essential that the tourism potential of the District is promoted and exploited to maximise benefits it can bring to the area including a large number of jobs*” (paragraph 2.31).

Policy SP2 – Strategic Growth and Distribution, sets out the overall principles for meeting the assessed development needs in the most sustainable manner and includes the provision that “*within the open countryside development will be assessed against the need to be in the location specified*”.

Policy EC9 – Arts, Culture, Tourism and Leisure Development, sets out that “*proposal will be supported where they contribute towards the development and/or protection of the arts, culture, tourism and leisure offer of the District and support the economy of the area*”. All proposals for this type of development must accord with the following criteria:

- The scale and design of the development is compatible with the character of the surrounding area;
- Adequate access by a choice of transport including sustainable modes of travel and appropriate car parking should be provided;

The plan further reinforces the important of these economic sectors as economic generators and how essential these sectors are to economic prosperity, employment and enjoyment. The potential of these sectors much be promoted and support to ensure continued growth of the economy (paragraph 4.39).

Policy EC 10 – Caravan, Camping and Chalet Sites sets out that the development of and extension to caravan, camping and chalet sites will be supported where:

- Clear and reasoned justification has been provided as to why the development needs to be in the location specified;
- The siting, scale or appearance of the proposal does not have an unacceptable adverse effect on the character of the local landscape or upon heritage assets or their settings;

- The site is contained within existing landscape features and if necessary and appropriate is supplemented with additional landscaping;
- Adequate access and appropriate parking arrangements are provided; and
- The potential implications of flood risk have been taken into account where necessary.

Recommendations

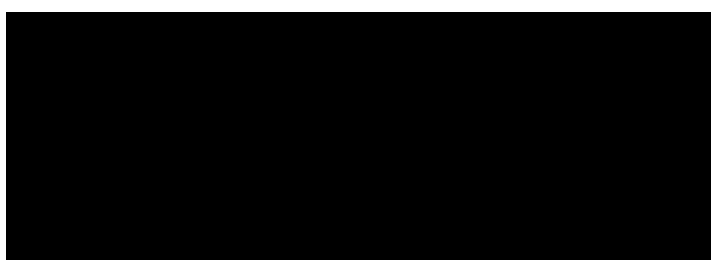
The Caravan Club support the emerging Local Plan 2015-2030, the policies and justifications throughout the plan document support the tourism industry and the provision of a specific policy relating to the development of Caravan, Camping and Chalet Sites is welcomed. The emerging policies will help to ensure that the tourism industry and specifically this form of tourism accommodation continues to thrive in Carlisle.

Emerging Policy EC10, is very clear on the criteria that must be met for the “development of and extension to” caravan, camping and chalet sites however it is unclear as to whether the diversification of existing sites would be acceptable. For example Englethwaite Caravan Club which is currently predominantly used by touring caravans may wish in the future to diversify their accommodation in the form of lodges or camping pods. This change in accommodation would allow the Caravan Club to ensure that the changing needs of the visitor economy are being taken into account and to ensure the economic viability of the site.

The change in accommodation from touring caravans to lodges or camping pods would have some impact on the site due to the nature of this type of accommodation being of a more permanent nature. However given this site has a large amount of existing hardstanding and is very well screened from the surrounding area the impact of this type of development would be minimal. Any impact on the surrounding area would be outweighed by the significant benefits to the tourism economy and employment in the local area.

Therefore it is requested that this policy clarifies that this type of development between the different types of tourism accommodation on existing sites is acceptable and will be supported in the right locations. This will ensure that local tourism businesses such as the Caravan Club can continue to be economically viable and support the rural tourism economy of the District.

Yours faithfully,



Duncan Parr BA DUPI Dip TP FRGS MRTPI Cgeog MEWI
Director