



An Addendum to the
Design & Access
Statement

This report has been prepared to supplement the original submission documents, and therefore focuses in upon the possible issue of a “loss of tourism”. As such, it makes reference both to Policy TSR5 of The South East Plan, and to Policy DEV37 of the Arun District Local Plan (which are referred to, from here on in, simply as TSR5 and DEV37).

The policies are relevant to the consideration of this application, as the site is currently in use as a holiday park. As such, and dealing with the policies in order of hierarchy, the following text seeks to show why we believe our scheme to be acceptable.

Policy TSR5 states that **In formulating planning policies and making decisions local planning authorities should:....include policies to protect the accommodation stock where there is evidence of market demand.**

Clearly such a policy is particularly relevant to the retention of holiday park's, such as that currently sat upon the application site, but only where there is evidence to show that there is a “market demand” for it. The Lillies Caravan Park is, however, a failing business, and the level of accommodation has dropped in both numbers, and in quality, over the past 2 years to reflect this market downturn.

The existing site facilities are sub-standard with no modern toilets or showers, coupled with the lack of an onsite shop and permanent site manager, leaves little attraction for today's holidaymaker. Current caravan and lodge accommodation is old and tired, with the recent addition of secondhand holiday lodges adding little to the overall quality of accommodation. The development of the site has further been hampered by ADC's refusal to grant permission for onsite accommodation for a permanent site warden or manager.

The simple fact of the matter is that unless an alternative use is found, this business will fail, and the site will stand empty (which, in itself, will have a detrimental impact upon the character of the site, and its surroundings). Indeed, and if it would be beneficial to the council for us to do so, we would be willing to share the accounts for this site, but would wish to do so on a confidential basis (for obvious reasons), thereby adding credence to this statement. As such, and in light of the site's declining popularity and usage, we fervently believe that our proposal is not in conflict with TSR5.

Moving on to look at DEV37, we find that it states that **Unless the site is allocated for other development within the Local Plan, the change of use of holiday caravan sites**

to other uses, including permanent residential use, will not be permitted. The policy is then supplemented by a ‘Reason’, which states that **The District is a highly popular area for caravan holidays. The District Council wishes to retain an adequate supply of this type of accommodation to meet the need in the area.**

As such, this is a key policy in the determination of this proposal; however, we would contend that its blanket-coverage approach is less-than-ideal, as it bears no relationship to issues such as viability and competition, and makes no allowance whatsoever for failing a business. Indeed, it’s also interesting to note that the council have done little to help businesses such as that at The Lillies, as, on it’s own web-site, it openly promotes the use of competitor’s sites and facilities (<http://www.sussexbythesea.com/site/where-to-stay/holiday-villages-caravan-and-campsites> - which is found from Arun’s own A-Z) – see extract below:

- **Brookside Caravan Park**



Brookside is an excellent centre for exploring the South Coast. Open for families from March to the...

- **Copthorne Caravans**



Copthorne Caravans is a small, family-owned holiday park with Rose Award holiday static caravans...

- **Church Farm Holiday Village**



Location: Pagham

Church Farm Holiday Village is a wonderfully relaxing landscaped Park with its own nature reserve...

As such, it is little wonder that our client's site is struggling to survive in a market place whereby its competitor's are actively promoted by its own local council.

It is also a strong tenet of the planning function that whilst policies should generally be adhered to, there is always scope available for them to be set aside where it can be proven that there is a sufficiently strong *material consideration* in existence for doing so. And, in this instance, we would contend that there are several such *material considerations*: firstly, the site is already failing - and will soon completely fail - as a viable holiday destination, and unless its use is changed, it will rapidly become an eyesore within its village setting; secondly, no allowance seems to have been made for *competition* (even though our client's site is not on a level footing with its competitor's, as shown above), and it seems almost foolhardy to insist upon a use without consideration of alternatives; and, thirdly, the council has a shortfall of housing land – as demonstrated in-depth in our original D&A Statement – coupled with this over-supply of caravan site land, and it is this latter element that we believe lends most strength to our case. As such, the *material consideration's* that have been demonstrated above, ought therefore to allow for the quite proper setting-aside of DEV37, thereby allowing for this site to take up the shortfall in an area where a consistent demand still exists; that being for housing.

We would therefore contend that our scheme conflicts with neither TSR5, nor with DEV37, and that because of this, these 2 policies should not be seen as a stumbling-block in the determination of this outline planning application.

Jacobs-Foreman Ltd.

March 2010