

Gemma Clark , Programme Officer
C/O Planning Policy Team

East Lindsey District Council
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Date: 21 June 2017

Our ref: 04051/12/NT/SFU/14216061v1

Dear Ms Clark

East Lindsey District Council: Inspectors' Matters, Issues and Questions Stage 1 - Local Plan Core Strategy, May 2017

On behalf of our client, Bourne Leisure Ltd. ("Bourne Leisure"), we set out below a statement in response to the Inspectors' question no. 8 in relation to Matter 15: Coastal East Lindsey (Policies SP18-21).

The 'Main issue' for Matter 15 is:

"Will Policies SP19, SP20 and SP21 achieve the aims set out on page 81 of the Core Strategy to give the Coast a strong, diverse, growing economy and business sector; and to enable all year round tourism?"

Question no. 8 is pursuant to Draft Policy SP19 (Holiday Accommodation); it states:

- i "Is the proposed restricted occupancy period for the relevant development of between 15 March and 31 October justified by a robust analysis of flood risk vs. the economic objective to extend the length of the holiday season?"*
- ii Has adequate account been taken of the protection offered by flood defences, early warning systems and evacuation plans?*
- iii Will it be difficult for newer businesses subject to the condition to compete with older ones without it?*
- iv Is the occupancy limit consistent with national policy which indicates that holiday caravans for year round use are capable of passing the Exception Test?"*

Background

Within East Lindsey, Bourne Leisure operates Butlin's at Skegness, and Golden Sands Holiday Park near Mablethorpe. Both holiday parks currently have site licences for caravan occupancy from 1 March to 30 November of each year.

You will be aware that Bourne Leisure recently provided written representations (dated 19 January 2017) to the East Lindsey Draft Core Strategy, Pre-Submission publication stage. That representation objects to the proposed restricted caravan occupancy period of between 15 March and 31 October (or the following Sunday) of each year as outlined in draft policy SP19, bullet point 7. Bourne Leisure considers that the emerging East

Lindsey Local Plan should not include a detailed policy specifying a fixed occupation period and in the January 2017 representation explains why.

The company considers this previous representation to be sufficient to answer the Inspector's main issue of Matter 15 and points 'i', 'ii' and 'iv' of question 8 as listed above. The following section of this submission answers part 'iii' of question 8.

Matter 15: Question 8, Part 'iii'

In direct response to question 8 part 'iii'; Bourne Leisure considers that the restriction on the caravan occupancy period that is proposed at bullet point 7 of draft SP19 *would* make it difficult for new businesses to compete with older businesses which would not be limited by the Policy. Bullet point 7 would consequently discourage new tourism business from locating in the District. The restriction would also discourage existing businesses from improving their sites with modern, less dense layouts which make use of adjacent land. This conclusion supports the Company's view (as expanded on at question 3 of the January 2017 representation) that including a rigid and reduced occupancy period in development plan policy would fail to maximise the contribution of tourism to the local economy.

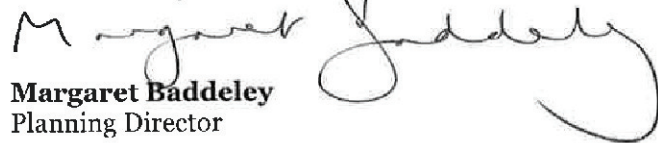
Consequently, Bourne Leisure has provided the changes that will be necessary to make Policy SP19 sound at question 4 of the January 2017 representations. This includes the alternative approach that, if a restriction on occupancy is considered to be necessary in development plan policy, the restriction should only be applied to small scale caravan sites. This approach would support the development of smaller caravan sites by making it easier for them to pass the exception test (the aim previously expressed by the Council) but would not discourage the expansion of existing, or the development of new larger caravan sites.

Summary

This Statement, along with the already submitted representation (dated 19 January 2017), has responded to the Inspector's Question no. 8 in relation to Matter 15. To ensure Policy SP19 is sound (positively prepared, justified, effective and consistent with National Policy) the suggested amendments to the policy should be considered.

Please keep us informed of any response by the Council or the Inspector to this Statement as the Examination progresses and in advance of the relevant Hearing in August.

Yours sincerely


Margaret Baddeley
Planning Director

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Bourne Leisure Ltd.