About you		
•	First name:	Michael
•	Surname:	Shaw
•	Address:	
•	I am completing this form as:	A business
•	If other, please specify:	•
•	Job title:	Director
•	Organisation:	•
•	On behalf of:	•
•	Email address:	
•	Did you submit comments on the Regulation 18 (First Draft) Local Plan?:	No
•	Local Plan Consultee List:	I would like to be added to the Local Plan consultee list
Share your comments		
•	Does your comment relate to a paragraph, policy or policies map?:	Policy
•	Please tell us which paragraph/policy your comment relates to:	Proposed Policy 5.6 (2) 'Camping and touring caravan sites'
•	Do you consider the Local Plan to be legally compliant?:	Yes
•	Do you consider the Local Plan to be sound?:	No
•	Do you consider the Local Plan to be compliant with the duty to co-operate?:	Yes

 Please tell us why you have answered yes and/or no to

the questions above:

Proposed Policy 5.6 (2) 'Camping and touring caravan sites' The proposed draft Policy relates only to new touring caravan and camping sites and makes no provision for upgrading and aesthetic or environmental improvements to existing sites. This is not consistent with the National Planning Policy Framework and therefore this policy is unsound. Existing touring and holiday caravan sites are occupied, almost exclusively, by white gloss painted metal clad caravan units which stand out significantly in the landscape. The DNPA have no control over the aesthetic appearance of caravan units sited on existing sites and they can vary in size, colour and appearance without control. To this day, the Caravan Acts of 1960 & 1968 set out the definition of a caravan and as long as a unit meets the legal definition of a caravan, a LPA cannot restrict or control the appearance or size of caravans on existing sites. Whilst any new grant of planning consent for a caravan site can impose conditions relating to the external appearance of the units, the only way to facilitate this control over an existing site is by encouraging the site owner to upgrade the site. Where a site owner can upgrade the caravan units to a higher quality and therefore value, and is encouraged by a policy facilitating this, the opportunity arises for the LPA to make a planning gain in terms of the aesthetic and environmental improvements. Aside from their negative aesthetic impact, touring caravans also create constant traffic movements on the main roads and lanes, often at the busiest times of the week, adding to congestion. Touring caravans are particularly ill suited to the narrow lanes and tight bends of Dartmoor roads. The draft Policy should include provision to permit and encourage the upgrading of both existing touring and holiday caravan sites where it facilitates the removal of unsightly and highly visible units and replaces them with new caravan units. The new caravan units would need to provide a significant aesthetic improvement such as natural timber cladding, slate or green / living roofs, as well as improvements to landscaping. Whilst this will involve a more permanent use of a touring pitch, it must be remembered that the existing pitch is never going to disappear and that the aesthetic, environmental and congestion benefits far outweigh this negative. This will not create any proliferation of development in rural areas and will not result in any increase in the number of caravan units. It will solely result in r

 What modifications do you consider necessary to make

Suggested additional clause to the policy: Existing touring caravan and holiday caravan parks will be permitted to replace existing pitches with new holiday

the Local Plan legally compliant and/or sound?:

caravan pitches only where this will result in the removal of existing traditional metal clad caravans and their replacement with caravans which have a significant aesthetic improvement, specifically that they have unpainted timber cladding and natural slate roofs, or green living roofs. It is will also be a requirement for natural landscaping to be planted to screen the development in order to reduce its impact on the countryside. Planning conditions will be imposed to ensure that any future replacement caravan on a pitch will adhere to the approved design and materials

Do you wish to participate in hearing session(s)?:

No, I do not wish to participate in hearing session(s)

 If you answered yes to the hearing session(s), please tell us why you consider this to be necessary:

•