
NORTH AYRSHIRE COUNCIL

4 September 2019

Local Review Body

Title:	Notice of Review: 19/00135/PP – Westbourne Caravan Park, West Bay Road, Millport, Isle of Cumbrae KA28 0HA
Purpose:	To submit, for consideration of the Local Review Body, a Notice of Review by the applicant in respect of a planning application refused by officers under delegated powers.
Recommendation:	That the Local Review Body considers the Notice of Review.

1. Executive Summary

- 1.1 The Town and Country Planning (Scotland) Act 1997, as amended by the Planning (Scotland) Act 2006, provides for certain categories of planning application for "local" developments to be determined by appointed officers under delegated powers. Where such an application is refused, granted subject to conditions or not determined within the prescribed period of 2 months, the applicant may submit a Notice of Review to require the Planning Authority to review the case. Notices of Review in relation to refusals must be submitted within 3 months of the date of the Decision Notice.

2. Background

- 2.1 A Notice of Review was submitted in respect of Planning Application 19/00135/PP – extension to existing caravan park to provide a further 18 stances together with alterations to the existing internal driveway, provision of bin stores and visitor car parking at Westbourne Caravan Park, West Bay Road, Millport, Isle of Cumbrae.
- 2.2 The application was refused by officers for the reasons detailed in the Decision Notice.
- 2.3 The following related documents are set out in the appendices to the report:-

- Appendix 1 - Notice of Review documentation;
- Appendix 2 - Report of Handling;
- Appendix 3 - Location Plan;
- Appendix 4 - Planning Decision Notice;
- Appendix 5 - Further representations from interested parties; and
- Appendix 6 - Applicants response to further representations.

3. Proposals

- 3.1 The Local Review Body is invited to consider the Notice of Review.

4. Implications/Socio-economic Duty

Financial

4.1 None.

Human Resources

4.2 None.

Legal

4.3 The Notice of Review requires to be considered in terms of the Town and Country Planning (Scotland) Act 1997, as amended by the Planning (Scotland) Act 2006, and the Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013.

Equality/Socio-economic

4.4 None.

Environmental and Sustainability

4.5 None.

Key Priorities

4.6 None.

Community Benefits

4.7 None.

5. Consultation

5.1 Interested parties (both objectors to the planning application and statutory consultees) were invited to submit representations in terms of the Notice of Review and these are attached at Appendix 5 to the report.

5.2 The applicant has had an opportunity to respond to the further representations and their response is set out in Appendix 6 to the report.

Craig Hatton
Chief Executive

For further information please contact **Hayley Clancy, Committee Services Officer**, on **01294 324136**.

Background Papers

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Cunninghame House Friars Croft Irvine KA12 8EE Tel: 01294 324 319 Fax: 01294 324 372 Email: eplanning@north-ayrshire.gov.uk

Applications cannot be validated until all the necessary documentation has been submitted and the required fee has been paid.

Thank you for completing this application form:

ONLINE REFERENCE 100168749-001

The online reference is the unique reference for your online form only. The Planning Authority will allocate an Application Number when your form is validated. Please quote this reference if you need to contact the planning Authority about this application.

Applicant or Agent Details

Are you an applicant or an agent? * (An agent is an architect, consultant or someone else acting on behalf of the applicant in connection with this application)

☐ Applicant ☒ Agent

Agent Details

Please enter Agent details

Company/Organisation:	<input type="text" value="Robertson Design Practice"/>		
Ref. Number:	<input type="text"/>	You must enter a Building Name or Number, or both: *	
First Name: *	<input type="text" value="Peter Kenneth"/>	Building Name:	<input type="text" value="REDACTED"/>
Last Name: *	<input type="text" value="Robertson"/>	Building Number:	<input type="text"/>
Telephone Number: *	<input type="text" value="REDACTED"/>	Address 1 (Street): *	<input type="text" value="REDACTED"/>
Extension Number:	<input type="text"/>	Address 2:	<input type="text"/>
Mobile Number:	<input type="text"/>	Town/City: *	<input type="text" value="REDACTED"/>
Fax Number:	<input type="text"/>	Country: *	<input type="text" value="REDACTED"/>
		Postcode: *	<input type="text" value="REDACTED"/>
Email Address: *	<input type="text" value="REDACTED"/>		

Is the applicant an individual or an organisation/corporate entity? *

☒ Individual ☐ Organisation/Corporate entity

Applicant Details

Please enter Applicant details

Title:

You must enter a Building Name or Number, or both: *

Other Title:

Building Name:

First Name: *

Building Number:

Last Name: *

Address 1
(Street): *

Company/Organisation

Address 2:

Telephone Number: *

Town/City: *

Extension Number:

Country: *

Mobile Number:

Postcode: *

Fax Number:

Email Address: *

Site Address Details

Planning Authority:

North Ayrshire Council

Full postal address of the site (including postcode where available):

Address 1:

WESTBOURNE CARAVAN PARK

Address 2:

WEST BAY ROAD

Address 3:

Address 4:

Address 5:

Town/City/Settlement:

MILLPORT

Post Code:

KA28 0HA

Please identify/describe the location of the site or sites

Northing

654450

Easting

215159

Description of Proposal

Please provide a description of your proposal to which your review relates. The description should be the same as given in the application form, or as amended with the agreement of the planning authority: *
(Max 500 characters)

Extension to existing caravan park to provide a further 18 stances together with alterations to the existing internal driveway, provision of bin stores and visitor parking.

Type of Application

What type of application did you submit to the planning authority? *

- ☒ Application for planning permission (including householder application but excluding application to work minerals).
- ☐ Application for planning permission in principle.
- ☐ Further application.
- ☐ Application for approval of matters specified in conditions.

What does your review relate to? *

- ☒ Refusal Notice.
- ☐ Grant of permission with Conditions imposed.
- ☐ No decision reached within the prescribed period (two months after validation date or any agreed extension) – deemed refusal.

Statement of reasons for seeking review

You must state in full, why you are seeking a review of the planning authority's decision (or failure to make a decision). Your statement must set out all matters you consider require to be taken into account in determining your review. If necessary this can be provided as a separate document in the 'Supporting Documents' section: * (Max 500 characters)

Note: you are unlikely to have a further opportunity to add to your statement of appeal at a later date, so it is essential that you produce all of the information you want the decision-maker to take into account.

You should not however raise any new matter which was not before the planning authority at the time it decided your application (or at the time expiry of the period of determination), unless you can demonstrate that the new matter could not have been raised before that time or that it not being raised before that time is a consequence of exceptional circumstances.

Appeal document attached.

Have you raised any matters which were not before the appointed officer at the time the Determination on your application was made? *

☒ Yes ☐ No

If yes, you should explain in the box below, why you are raising the new matter, why it was not raised with the appointed officer before your application was determined and why you consider it should be considered in your review: * (Max 500 characters)

Further economic and social justification together with precedent information.

Please provide a list of all supporting documents, materials and evidence which you wish to submit with your notice of review and intend to rely on in support of your review. You can attach these documents electronically later in the process: * (Max 500 characters)

Appeal report together with supporting letters and emails.

Application Details

Please provide details of the application and decision.

What is the application reference number? *

N/19/00135/PP

What date was the application submitted to the planning authority? *

21/02/2019

What date was the decision issued by the planning authority? *

02/04/2019

Review Procedure

The Local Review Body will decide on the procedure to be used to determine your review and may at any time during the review process require that further information or representations be made to enable them to determine the review. Further information may be required by one or a combination of procedures, such as: written submissions; the holding of one or more hearing sessions and/or inspecting the land which is the subject of the review case.

Can this review continue to a conclusion, in your opinion, based on a review of the relevant information provided by yourself and other parties only, without any further procedures? For example, written submission, hearing session, site inspection. *

☐ Yes ☒ No

Please indicate what procedure (or combination of procedures) you think is most appropriate for the handling of your review. You may select more than one option if you wish the review to be a combination of procedures.

Please select a further procedure *

By means of inspection of the land to which the review relates

Please explain in detail in your own words why this further procedure is required and the matters set out in your statement of appeal it will deal with? (Max 500 characters)

Site inspection will better inform the review body of the proposals and their impact on the landscape and adjacent dwellings.

In the event that the Local Review Body appointed to consider your application decides to inspect the site, in your opinion:

Can the site be clearly seen from a road or public land? *

☒ Yes ☐ No

Is it possible for the site to be accessed safely and without barriers to entry? *

☒ Yes ☐ No

Checklist – Application for Notice of Review

Please complete the following checklist to make sure you have provided all the necessary information in support of your appeal. Failure to submit all this information may result in your appeal being deemed invalid.

Have you provided the name and address of the applicant?. *

☒ Yes ☐ No

Have you provided the date and reference number of the application which is the subject of this review? *

☒ Yes ☐ No

If you are the agent, acting on behalf of the applicant, have you provided details of your name and address and indicated whether any notice or correspondence required in connection with the review should be sent to you or the applicant? *

☒ Yes ☐ No ☐ N/A

Have you provided a statement setting out your reasons for requiring a review and by what procedure (or combination of procedures) you wish the review to be conducted? *

☒ Yes ☐ No

Note: You must state, in full, why you are seeking a review on your application. Your statement must set out all matters you consider require to be taken into account in determining your review. You may not have a further opportunity to add to your statement of review at a later date. It is therefore essential that you submit with your notice of review, all necessary information and evidence that you rely on and wish the Local Review Body to consider as part of your review.

Please attach a copy of all documents, material and evidence which you intend to rely on (e.g. plans and Drawings) which are now the subject of this review *

☒ Yes ☐ No

Note: Where the review relates to a further application e.g. renewal of planning permission or modification, variation or removal of a planning condition or where it relates to an application for approval of matters specified in conditions, it is advisable to provide the application reference number, approved plans and decision notice (if any) from the earlier consent.

Declare – Notice of Review

I/We the applicant/agent certify that this is an application for review on the grounds stated.

Declaration Name: Mr Peter Kenneth Robertson

Declaration Date: 11/06/2019

ROBERTSON DESIGN PRACTICE

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

**APPEAL AGAINST REFUSAL OF PLANNING APPLICATION 19/00135/PP
EXTENSION TO EXISTING CARAVAN PARK TO PROVIDE A FURTHER 18 STANCES TOGETHER
WITH ALTERATIONS TO THE INTERNAL DRIVEWAY, POSITION OF BIN STORES AND VISITOR
PARKING,
WESTBOURNE CARAVAN PARK, WEST BAY ROAD, MILLPORT, ISLE OF CUMBRAE KA28 0HA.**

INTRODUCTION.

This appeal is against the decision by North Ayrshire Council to refuse consent to extend the existing caravan park at Westbourne, Millport, Isle of Cumbrae.

HISTORY.

The current owners, Mr. and Mrs. Parry-Mellor purchased Westbourne Caravan Park in November 2003 and have operated it successfully since then. At the time of their acquisition the caravan park consisted of 31 holiday caravans although the original caravan park also encompassed the adjacent lodges, 8 in total, which were sold off prior to them taking possession of the business.

The owners then spent some time improving the existing site, upgrading the caravan stock and generally bringing the site up to a standard with which they were happy. Having completed the upgrading the owners considered the opportunity to extend the park and, after discussions with the planning officers at North Ayrshire Council, an application was submitted for an extension to the park, in the adjacent field, to increase the numbers by 40 which was approved in 2016.

This extension was intended to take 5 years to complete and be fully operational however, such was its popularity, the demand and uptake of units meant that the works had to be accelerated and the development was almost complete within 3 years with the last of the caravans expected to be sold by the end of the current year.

Given the demand, the owners again approached the planning officer at North Ayrshire Council, with whom they had previous dialogue, and who had dealt with the previous application. They discussed a further extension within the remaining portion of the field and received a positive response, although they were advised to leave a small area between the existing houses in West Bay and the first caravans in the new development.

On the strength of this advice the owners entered into a contract to purchase the remaining section of field and instructed the preparation and submission of a planning application to reflect the conclusions of the earlier discussions.

This planning application was prepared and consisted of a further 34 caravans with increased space between each and set in such a way as to reduce the impact on the adjacent houses. A small area was left undeveloped adjacent to the houses and a new vehicle entrance proposed off the main road to serve the new section of the caravan park.

The application was submitted in November 2018 and during this period, the officer with whom the client had had discussions, Mr. R. Middleton, left the authority and the application was allocated to another officer unfamiliar with the site and to a great extent, the economy of the island.

It became apparent during the course of this application's consideration that the planning officer was unlikely to recommend approval. There followed some discussion but no agreement could be reached which would allow the planning officer to reverse his opinion and the application was refused.

The reasons for refusal were;

1. the proposed scheme would lead to coalescence with the town of Millport.
2. there was no economic justification for the development.
3. that the development would lead to the loss of agricultural land.

Subsequent to this refusal there were further discussions with the planning officer who confirmed that a smaller extension to the caravan park could be acceptable if a significant gap was left between the existing housing and the proposed caravans. Sketch layouts were prepared and presented for consideration but the planning officer eventually indicated that even the reduction of over 50% of the previous proposal was unlikely to receive support from the planning authority. In his opinion, there was little point in submitting a revised application as the number of additional caravans which he could consider acceptable was likely to be so few as to be un-acceptable to the client.

The client commissioned an economic study of a reduced scheme and on the strength of this and the earlier discussions instructed that a revised application be submitted.

In addition, subsequent to the first refusal, the client received considerable support from local business's which also encouraged him to submit this application. It is fair to say that there was considerable surprise amongst residents and business's that the original application was refused.

The reduced scheme consisted of a significantly reduced area, 18 caravan stances rather than 34 and retained a large, undeveloped area between the extended site and the housing at West Bay. This area was then available for the client to landscape, if deemed necessary, to improve the setting of both the adjacent housing and extension to the caravan park. This revised scheme also removed the necessity to create an additional vehicle access into the site, utilising the current access and extending the internal driveways.

The revised application was submitted on 21 February 2019 accompanied by the economic study and a justification for the development. A significant number of letters of support were received by NAC including support from Community groups and a large number of business owners and individuals on the island.

During the course of the application a number of objections were submitted, primarily from adjacent, local residents.

This revised application was again refused but this time on lesser grounds, namely;

1. The proposed development would be contrary to Policies TOU 1, ENV 7 and criteria (a), (b), and (c) of the General Policy of the Local Development Plan in that it would result in visual coalescence between the settlement of Millport and the caravan parks in the form of ribbon development along West Bay Road. The combined scale of the existing caravan parks with the proposed development would have a significant negative impact on both the designated Special Landscape Area, and the wider special landscape character and appearance of Great Cumbrae.

JUSTIFICATION FOR PROPOSALS.

The current proposal is to extend the existing caravan park at Westbourne into the adjacent field to the south west of the park. This field has been used for rough grazing for a number of years and is poor quality agricultural land with poor quality soil and bad drainage. The development would consist of 18 static pitches together with visitor parking. The client felt the proximity of the playing fields and play area at West Bay negated the need to provide the same facilities on the extended site and also felt that this could introduce a noisy and obtrusive element to the development to the detriment of the current and proposed residents.

The nearest property to the extended site is the first/last house in West Bay Road and would be 130 metres from the nearest caravan.

The design takes cognisance of the views from this house and the caravan stances have been set to ensure that these views are protected.

The client is anxious to respect the existing ground profiles and the arrangement of the caravan stances responds to the existing contours whilst allowing more space between each and maximising their views. This layout is more spacious than the previously approved extension and seeks to reduce its visual impact.

Given the orientation of the nearest house, as noted above, there would be little visual impact on this dwelling and visual impact assessment should be viewed from the standpoint of the road/footpath and cycle users.

The site can only be viewed in two directions, from the south west, when approached from West Bay Road, and the north east, when approached from the top end of the island. The view from the north east is totally obscured by the existing Westbourne House and caravan park leaving only the view from south west being relevant.

The existing contours, which will be retained and enhanced by additional earth mounding and planting, obscure the view of the existing caravan park as you approach the site immediately adjacent to the first/last house. In addition the proposed caravan layout sets the first pitches further back from the road/footpath thus reducing their initial impact. As one progresses along the face of the proposed caravan park the pitches become gradually closer until they merge with the existing layout creating a seamless transition between existing and proposed caravans.

GROUND'S FOR APPEAL.

Taking each of the grounds for refusal in turn;

TOU 1: TOURIST ACCOMMODATION AND FACILITIES

Policy TOU 1 states that development in the Countryside accords with the LDP subject to certain criteria. It should be noted that this policy has a presumption in favour of tourist accommodation, recognising its value to the local economy and job creation.

Criteria (a), the development is an existing building suitable for conversion, is not applicable.

Criteria (b), development can demonstrate a site specific locational need.

The site is located immediately adjacent to the applicant's current caravan site which has existed and increased in size since the 1960's. The development would have direct access from within the current caravan park and share existing amenities in terms of drainage, power supplies and maintenance. Whilst the suggestion is that there are other sites which could be suitable this would, in turn, lead to sporadic development on the island which would be more detrimental to the character of the island. Sporadic developments would also require significant alterations and improvements to the existing infrastructure.

Criteria (c), there is a social and/or economic benefit to the area.

An economic study of the extension to the caravan park was submitted which more than adequately sets out the economic benefits to the island. Not only would additional owners lead to increased spending on the island but there was support for the equivalent of an additional 3 full time jobs or 5 of a part time nature.

The previously approved extension has already provided employment. As an example a local gas engineer whose contract with Scottish Gas was reduced to a 3 day week has been able, after re-registering for LPG, to fill the other 2 days with gas fitting and maintenance at the site and, in addition, provide emergency cover on the island where previously this service had to be provided by gas engineers from the mainland.

It should be noted that tourism and tourism related business are the only significant private employers on the island and the very fragile economy of the island depends entirely on tourism. In this regard any reasonable potential development which can increase tourism should be supported and at times this economic benefit should outweigh other, lesser important criteria.

Criteria (d), it is of a scale and character which is not detrimental to the amenity and landscape of the area.

The revised scheme is much reduced from the previous application and retains a large undeveloped area between the caravan park and the nearest housing. The scale is much reduced and even the cumulative capacity of the existing and proposed numbers would be significantly less than the capacity of the main caravan park on the island.

The character of the proposed scheme is an improvement on the previously approved and constructed extension in that the space between caravans is increased and, by utilising the existing contours, the setting of both the caravans and adjacent housing have been more considered.

Whilst the reasons for refusal state that this would be a standard caravan park it has been noted that the proposed layout is less dense and more responsive to the existing landscape than before. The previous extension was approved despite being more dense and being a more significant

increase in numbers (100%) over the original park. This current proposal seeks to increase the numbers by 20% and, as stated, in a less dense arrangement than before.

Comment has been made on the detrimental impact on marine tourism which would result if the increased caravan park were approved. This is based on the presumption that the sailing community would be put off sailing in this channel by the sight of the increased caravan numbers. This, I would contend, is both groundless and far-fetched as there are far more unsightly developments within the Firth of Clyde which have a greater visual impact than the proposed caravan park extension. Indeed, it should be noted, there are members of the sailing community who are caravan owners on this site and, in one case, it was when they viewed the site from their yacht that they decided to purchase a caravan at Westbourne.

There is a significant foreshore and agricultural area with mature hedgerows between the river and the site which foreshortens and obscures the views and reduces the impact of the caravan park when viewed from the shore or within the Firth of Clyde itself. The other caravan park on the island sits on the crest of the hills adjacent to the golf course and is much more visible from the water and further afield.

ENV7

Special Landscape Areas

This policy seeks to safeguard or enhance the character or appearance of the landscape within Identified Special Landscape Areas unless it meets certain criteria and in the case of this application the most relevant criteria is

(b) is a recreation, leisure or tourism proposal which will bring a level of social and economic benefit to the area which outweighs the need to protect the area from development.

In respect of the application site, it may well be the case that the site is within the Special Landscape Area of Great Cumbrae Island, however I would contend that this designation has been placed as a blanket over the island without consideration of the character of all of the areas so covered.

This site, as noted earlier, is a low quality, poorly drained, agricultural field which provides only rough grazing for cattle. There is no record of endangered species of flora and fauna nor invertebrates or any other significant wild life. Were this site situated anywhere else I would contend it would not be considered a site of Special Landscape.

It has been proven, and accepted, that the proposals will bring an economic benefit to the island and there is clear social benefit in a) meeting the growing demand for this type of holiday accommodation b) bringing further visitors to the island making use of the leisure facilities available to their benefit and long term sustainability.

There is a contention that the development of this site is in essence a "ribbon development" forming coalescence with Millport but it should be noted that the development of the housing in West Bay was, in itself, a ribbon development from the more defined town and this ribbon development continued into the 1950/60s until the last house was constructed.

Further reference to the impact of ribbon development will be addressed in the precedent which is discussed later and direct comparisons can be drawn between the two applications and the differing conclusions drawn.

There is a suggestion that consent to this proposal would make it difficult to resist pressure on the remaining land, I would contend that the planning authority have the ability to resist such pressure and my client is clear that they have no intention of seeking a further consent at a later date if this appeal were upheld.

CONTEXT PHOTOS



View of site from boundary with first/last house on West Bay Road, development area not visible due to existing contours.



View of site from further along West Bay Road with existing caravan park in distance.



View of existing caravan park with caravan stances sitting on existing contours.



View from proposed site boundary back to first/last house on West Bay Road showing extent of green buffer area being retained.



View of site from foreshore with visibility reduced due to existing contours and hedgerows.



View into edge of existing site and view of proposed site from other side of West Bay Road. Landscaped mound to be moved to new boundary and new screen planting to be cultivated.

PRECEDENT.

In further support of this appeal I would refer to a similar development for the extension of a caravan park with North Ayrshire Council.

The site in question is Seaview Caravan Park, Seamill where an application, reference number 18/00315/PP, was submitted in April 2018 and approved in June 2018

This caravan park applied unsuccessfully on several earlier occasions to extend their site and increase their numbers, this most recent application to increase the numbers by 120%.

This application was dealt with by the planning officer who previously dealt with Westbourne Caravan Park, Mr. R. Middleton.

The same criteria for consideration were used in relation to this application and almost all of the same issues were encountered. The application was approved having taken account of all relevant matters in relation to Policy TOU1, ENV8 and ENV9.

In particular the issue of coalescence was considered in respect of this site, which, combined with the approved housing developments on the southern edge of Seamill and the ongoing development of the Waterside Inn, have resulted in a significant reduction in the space between the town of Seamill and the extended caravan park.

In addition, whilst this site is not part of a Special Landscape Area, I would contend that it is equally, if not more significant, in that it is on the undeveloped foreshore immediately adjacent to the beach, highly visible from both a main coastal road, the A78(T), and the Firth of Clyde. It was considered that the scale and character of the development would not be detrimental to the amenity and landscape of the area despite the fact that it increased the numbers of caravans by 120%. There was no suggestion that this, more than doubling of the size of the caravan park, would impact on marine or any other form of tourism in the area despite being in a far more prominent landscape position.

Whilst, as noted above, this site is not in a Special Landscape Area, it is in an equally sensitive area being part of the Ardrossan-Seamill Shore Local Nature Conservation Site which is considered an important habitat for both vegetation and birdlife and is important to ecological interests. In this regard the officer felt that the development had the potential to improve the quality of the site and that the proximity to the road combined with the limited quality of the habitat meant that there was not a significant detrimental effect on the Local Nature Conservation Site.

I would contend that a similar approach should be taken in respect of the site now under appeal in that it is again of poor quality and does little to provide either habitats or an attractive landscape setting and the proposed development, by condition, could address both issues.

In further considering this application, the planning officer made particular reference to LDP2 which, having limited influence, does propose to support tourism where they promote economic activity, particularly where they develop coastal tourism. Additional referencing North Ayrshire Councils Tourism Action Plan 2018-2022 which focusses on capitalising on the North Ayrshire coastline and states that tourism has the potential to make massive difference to local economic revival. This plan outlines 4 key actions, one of which is 'Driving Growth'.

It was concluded that the economic benefit of this application outweighed the other factors and I would contend that the positive economic impact on Millport would be more significant than that to the local area of Seamill and the adjacent towns where there are far more business and work opportunities than in Millport and the Isle of Cumbrae where tourism is virtually the only 'industry'.

CONCLUSION.

The above appeal has firstly responded to the limited reasons for refusal, providing justification and support for this appeal and, by referencing a recently approved and similar development, has illustrated a more thoughtful consideration of the significant factors which must be considered and which resulted in approval.

The very fragile nature of the economy of Millport is far more significant than almost anywhere else in North Ayrshire, the island relying solely on tourism, and the council should fully support any sensible and reasonable development which further bolsters this activity.

My client has been the single largest investor in tourism on the island and this current proposal will further increase this investment to the benefit of not only his business but to the wider business community on the island whilst also providing employment.

I would ask that this appeal be upheld.

Firth View Caravan Park, Isle of Cumbrae

Proposed Park Extension - Economic Impact Analysis

Prepared by
Talk Associates

February 2019

Firth View Caravan Park, Isle of Cumbrae

Proposed Extension – Economic Impact Analysis

1. Introduction

- 1.1 Firth View Caravan Park is located on the island of Great Cumbrae, just to the south-west of the island's main settlement, Millport. The Caravan Park is part of a family-owned company which also operates the nearby Westbourne House Caravan Park and self-catering properties.
- 1.2 Firth View Caravan Park at present offers 40 pitches for caravan holiday homes. 34 of these are currently occupied and it is anticipated that the remaining six will be occupied during 2019. No touring caravans/motorhomes/tents are permitted. All of the caravan holiday homes are privately owned, with the vans being sold by the Park operators. The Park is open for ten months of the year (1 March to 6 January i.e. 312 days per annum).
- 1.3 As part of its ongoing development, Firth View is currently keen to expand its operations, and is planning to submit a planning application to North Ayrshire Council which sets out proposals to extend the park, creating a further 18 pitches for accommodation units, each of which would sleep up to six people.
- 1.4 One of the factors which will be taken into account when assessing the planning application is the degree of local economic benefit which would be created by the extension. Tourism consultancy firm Talk Associates was therefore commissioned in February 2019 to carry out this independent economic impact analysis of the proposed Park extension. Talk Associates specialises in the caravan sector, having carried out similar analyses across the country including Angus, Dumfries and Galloway, Dundee, Fife, Perthshire, West Sussex and indeed other parts of Ayrshire.

Our Approach

- 1.5 We have approached this work as follows:
 - We begin with a brief overview of the caravan sector in Scottish tourism, highlighting its special importance to Ayrshire.
 - We then provide a general definition of 'economic benefit' with particular reference to what this means in the context of Firth View Caravan Park.
 - We then describe the robust methodology we have used for quantifying the economic impact which would result from an extension to the Park.
 - We then proceed to calculate the most important element in economic impact – the direct expenditure which would be created by the Park's extension. In doing so, we draw on highly-relevant data sourced from several studies undertaken in different parts of Britain.
 - We then go on to calculate the **total** economic impact for Cumbrae/North Ayrshire which would be created by the Park's extension.

2. Caravan Tourism in Scotland and North Ayrshire

2.1 The value of caravan holidays to Scottish tourism has been greatly under-acknowledged in the past; caravanning has arguably been viewed as something of a Cinderella sector by many, and yet it is hugely important to the national tourism economy – and particularly so to Ayrshire.

2.2 However, there are encouraging signs that this perception is changing. Most notably, the Tourism Development Framework for Scotland, published in 2013 to support the National Tourism Strategy, stated:

“Holiday parks are important largely for the domestic tourism market in terms of the volume of rural tourism bed spaces they provide and the economic benefits that flow from this scale of tourism activity.”

2.3 In late 2014, the Scottish Caravan and Camping Forum published an extensive report *“Economic Impact of the Holiday Park Sector in Scotland”* - the most comprehensive independent study of the sector ever undertaken. Data was collected from holiday park operators across Scotland (including several in Ayrshire) and from a survey of 7,034 people who had taken a caravan holiday in 2014. This large sample size makes the findings very robust. The research found that:

- In the year to October 2014, visitors to Scotland’s holiday parks spent just over £700 million, supporting almost 13,000 FTE jobs in Scotland and contributing £356.3 million of Gross Value Added to the Scottish economy.
- **Caravan tourism is disproportionately important to Ayrshire and Arran.** The area has 14% of all the caravan pitches in Scotland and 20% of all the “owner-occupied” caravan pitches in Scotland (there are, by some distance, more owned caravan holiday homes in Ayrshire and Arran than in any other part of Scotland).
- In the twelve months to October 2014, visitors to holiday parks in Ayrshire and Arran spent an estimated £98.6 million and supported 1,826 full-time equivalent jobs. These figures mean that Ayrshire and Arran is the third-most-important area of Scotland in terms of caravan tourism (the others being Highlands and Dumfries and Galloway).
- Almost three-quarters of this £98.6 million (£72.5 million) was spent by caravan holiday home private owners – the exact market sector in which Firth View operates.
- The stereotypical view of caravanners being low-spending visitors is both inaccurate and outmoded: in 2014, visitors who owned their holiday home spent, on average, £89.68 per day locally (this includes both on-site and off-site expenditure).

2.4 In the four years since the above report was published, the caravan holiday home market has continued to flourish across Scotland, but from anecdotal reports, it would seem that this is especially so on the Clyde Coast. Holiday parks in the area, including Firth View itself, report high levels of interest from prospective new caravan owners. Factors such as the weaker pound and ‘Brexit’ are encouraging more stay-at-home holidays, and caravan tourism is proving to be something of a boom sector for the Ayrshire economy.

3. Economic Impact Assessment

- 3.1 In this, the main section of our report, we calculate the additional economic benefits which an extended Firth View Caravan Park would bring to the North Ayrshire economy.
- 3.2 The caravan owners who use the Park at present are virtually all Scottish (mostly living in west central Scotland) and use their caravans often. During spring and autumn, their visits tend to be at weekends (Friday night to Sunday afternoon), with longer stays being more common in summer and around Easter. There are increasing numbers of visits in the cooler months, helped by the modern generation of caravan holiday homes which come with central heating, insulation and double glazing as standard. Anecdotal evidence from around Scotland suggests that all over the country, caravan holiday home owners are seeking to maximise their investment by using their vans more frequently than once might have been the case. If this is indeed so, it will be good news for the local economy.
- 3.3 For the purposes of this report, we have assumed that the profile of owners purchasing caravans in any future Park extension will be the same as for the rest of the Park currently.

Definition of "Economic Benefit"

- 3.4 It is important at the outset to define what is meant by "economic benefit". In this report - as is customary of studies of this type - economic benefit is taken to refer to positive impacts within the local economy arising as a result of expenditure on goods and services by those coming to stay at Firth View. Such expenditure would also have a positive effect on employment locally.
- 3.5 Economists normally identify three specific types of economic impact, as set out in the table shown overleaf.
- 3.6 The normal method of calculating economic impact, totalling up the three types of impact described in the table, is Multiplier Analysis. The injection of visitor spending into the local economy will stimulate an increase in the level of economic activity that, in turn, will generate further income and employment locally; in other words, the initial direct impact is multiplied through the economy by the further transactions it generates.
- 3.7 Theoretical economists have defined several different types of economic multiplier; however, the type considered in this report is by far the most commonly used and widely understood, the so-called 'Keynesian' model. This is based on identifying streams of income and employment which are generated in 'rounds'; these streams diminish at each successive round because of leakages to the wider economy.

Type of Economic Impact	What it means (in the context of Firth View Caravan Park)	What affects it (in the context of Firth View Caravan Park)
Direct	The value of purchases from businesses on Cumbrae (or elsewhere in North Ayrshire) made by Firth View's customers (for example, spending on meals, drinks, shopping and activities).	How many customers are attracted. Length of stay by customers. Average per capita spend by customers. Where Firth View's customers spend their money – is it at locally, nationally or overseas-owned businesses?
Supply Linkage (also known as Indirect Impact)	The knock-on effects when the business (and other local businesses used by Firth View customers) then purchase further goods from local suppliers. For example, a restaurant in Millport buying meat from the local butcher.	Whether Firth View and other businesses buy everything they need from local suppliers or the extent to which they use suppliers from further afield.
Income (also known as Induced Impact)	Those supplying goods and services to Firth View's customers then spend part of their extra income within the local economy, generating further impacts. For example, the Millport restaurant owner buys a new car from a dealer in Ardrossan.	How much extra personal income is earned. Whether local business owners and their employees spend their extra income locally or further afield.

Quantifying The Economic Impact

3.8 Clearly, when attempting to quantify the economic impact of a business such as Firth View Caravan Park, the most important measure will be direct expenditure - how much money do Firth View's visitors currently spend, both on-site and in the local economy? That question is addressed in paragraphs 3.19 to 3.22 below.

3.9 Having estimated the direct expenditure, establishing the size of the multiplier coefficient which will apply is then critical to the process of estimating the economic benefits which might flow to the local area. But first, account must be taken of additionality.

Additionality

3.10 “Additionality” refers to the net added value to the local economy which would result from Firth View Caravan Park's extension. It must be considered whether there would be a likelihood of additional economic benefits accruing to the area if the business did **not** expand. In our view, in the foreseeable future, there is no realistic prospect of generating any meaningful economic returns from other types of activity on the land being proposed for the park extension (it is currently rough grazing land). **The additionality factor for Firth View is therefore assessed to be 100%.**

3.11 Given that the additionality factor is assessed to be 100%, it is relatively simple to calculate Firth View's net additional impact, using the formula below:

$$AI = [GI \times (1 - D) \times (1 - L) \times M]$$

Where AI = net additional impact

GI = gross economic impact

D = displacement

L = leakage

M = multiplier

Source: Adapted from English Partnerships Additionality Guide, A Standard Approach to Assessing the Additional Impacts of Projects, Method Statement, Second Edition, London, 2005

Displacement

- 3.12 'Displacement' is an assessment of the extent to which an extension of the Holiday Park would cause spending to be shifted from one part of the North Ayrshire economy to another. The only two possible types of displacement would be if (a) caravan holiday homes in the Park extension were purchased by owners currently using another Cumbrae/North Ayrshire caravan park; or (b) caravan holiday homes in the new extension were purchased by North Ayrshire residents (because such owners would not be bringing in any new money to the local economy).
- 3.13 In respect of (a), Firth View's proprietors are of the view – based upon their recent experience - that all of the caravans in the extended Park would be purchased by completely new customers, who do not currently own caravans on other parks on Cumbrae or on the mainland; however, even if customers **did** move from another park to Firth View, the demand for sites in Ayrshire holiday parks is very healthy, and this would almost certainly mean that their vacated space in their original park would be filled, thus negating any displacement factor. We have therefore estimated this future displacement factor as being a minimal **5%**.
- 3.14 In respect of (b), we understand that none of the caravans on the existing Firth View Park is owned by North Ayrshire residents. It would therefore seem reasonable to assume that the same ratio would apply for the Park extension, and so we have estimated the displacement factor as being **0%**. **The total future displacement factor is therefore (a) + (b) = 5%.**

Establishing the size of the Multiplier and Leakages

- 3.15 Various factors affect the size of the multiplier: the most important is the definition of "the local economy". The more narrowly the local economy is defined, the higher will be the leakages from it and the lower the multiplier. So in this case, if "the local economy" was to be defined as the immediate area (i.e. the Isle of Cumbrae) the multiplier will be lower than if "the local economy" is defined as meaning the whole of North Ayrshire. Clearly, most of Firth View's customers' expenditure will be on Cumbrae itself, but given that all of them travel on the ferry to and from Largs, it seems appropriate in these circumstances to extend the definition of "the local economy" to take in all of North Ayrshire.
- 3.16 So, how big will the multiplier coefficient be for Firth View? The most accurate answer would be obtained through primary data collection which would try to establish the level of economic leakage from the area by monitoring the spending patterns of individuals and businesses locally. Unfortunately, that

information is not available to us, and therefore the best way of estimating the multiplier will be to look at those used in similar studies elsewhere in the UK.

- 3.17 The seminal work on tourism multipliers in the UK was carried out forty years ago in Tayside Region and established a coefficient of 1.34 – that is, for every £1 spent by a visitor, an additional £0.34 of indirect and induced expenditure is generated. A review of UK tourism multiplier studies undertaken for the RSPB in 1995 found a range of multipliers between 1.24 and 1.45, pointing further to the likely accuracy of the 1.34 figure.
- 3.18 In Scotland, the multipliers that are now almost always used by bodies such as Scottish Enterprise and local authorities are those originally produced by the Scottish Tourism Multiplier Study 1993 (STMS), and it is these which we will use in this report. These multipliers differ depending on the characteristics of the local economy in question. In the case of Firth View Caravan Park, there are two STMS multipliers which would apply:
- (a) money spent on site (i.e. on fees paid direct to the site owners) would be classed as being “spending in a rural area”, and **both an indirect multiplier of 1.10 and an induced multiplier of 1.15 would apply.**
 - (b) money spent by guests on Cumbrae (or elsewhere in North Ayrshire, including ferry fares) would be classed as being “off-site spending in a rural area” and **a combined multiplier of 1.32 would apply.**
- 3.19 To illustrate how these figures will be used below:
- (a) Every £10 spent on site by Firth View customers will be multiplied by 0.95 to take account of displacement, then multiplied by 1.10 and multiplied again by 1.15. This amount would then be multiplied by 1.00 to take account of additionality, giving a total output generated locally of £12.02.
 - (b) Every £10 spent off site by Firth View customers – for example, on eating out, shopping or golf green fees – will be multiplied by 0.95 to take account of displacement, then multiplied by 1.32. This amount would then be multiplied by 1.00 to take account of additionality, giving a total output generated locally of £12.54.
- 3.20 In terms of employment generation, the most-often cited relevant research was carried out (in England and Wales) by the Countryside Agency in 2000. It specifically looked at the economic impacts of recreation and tourism and indicated that one full-time equivalent job (FTE) was created for every £34,000 of visitor expenditure (£56,780 at 2019 prices). The RSPB review of multipliers mentioned above found there to be a lower figure of £25,000 per job (£47,750 at 2019 prices). Another ratio also often used is one derived in 1996 for Scottish Enterprise, which cited £33,500 per job (£62,310 at 2019 prices) Given this fairly wide disparity, **a “middle ground” figure of £55,613 expenditure per FTE is therefore used in this report.**

Calculating Direct Expenditure

3.21 In this section, we calculate the direct expenditure which would be injected into the local economy by the owners of accommodation units in the proposed holiday park extension. In making these calculations, we have worked from the following assumptions:

(a) The extension would be comprised of 18 pitches to house accommodation units each sleeping up to six people.

(b) All of the units would be available for occupancy throughout the Park's opening period (312 days per annum).

(c) Occupancy rates - though precise occupancy rates are not captured, the Park's owners advise that weekend and school holiday occupancy rates are high, whereas weekday occupancy rates at other times of the year are markedly lower. For the purposes of this report, we have assumed that each unit will be occupied for an average of 99 days per year (9 weeks of full occupancy, mainly during school holiday periods, and 18 x 2-day weekends/short breaks at other time of year).

(d) Expenditure – for on-site expenditure, we have assumed that all owners on the extended park will pay the same annual pitch fee which applies to the current park i.e. £2,400. There is no other net on-site expenditure (gas consumption is re-charged to caravan owners at cost). For off-site expenditure, we have used data from the study referenced in Para 2.3 above which indicated average daily off-site spend per caravan holiday home was £44.98 (£49.93 at 2019 prices).

3.22 Putting all of these figures together, the following emerges:

Each unit on the Park extension would be occupied for an average 99 days annually, with each unit spending £2,400 on annual pitch fees, and £49.93 per day off-site. Each new unit would therefore generate £2,400 of on-site and £4,943 of off-site direct expenditure per year. Collectively, the 18 proposed new units would therefore generate £43,200 of on-site and £88,974 of off-site direct expenditure per year.

Calculating Total Economic Impact

3.23 To calculate the total annual economic impact of the proposed Park extension, we take the direct expenditure figures shown above and multiply them by the coefficients described in Paras 3.19 and 3.20 above.

3.24 The results are as follows:

- On-site expenditure is $£43,200 \times 0.95 \times 1.10 \times 1.15 \times 1.00 = \textbf{£51,915}$
- Off-site expenditure is $£88,974 \times 0.95 \times 1.32 \times 1.00 = \textbf{£111,573}$
- **Grand total economic impact in the local area annually = £163,488**
- **Grand total full-time equivalent jobs created and permanently sustained in the local area = 3**

- 3.25 It should be noted that the **actual** number of jobs created and sustained by the park extension would be more than this, given that most jobs in the tourism and hospitality sector are part-time and to some degree seasonal. **It is likely that the number of actual jobs created and sustained locally would be around 5.**
- 3.26 There would be further economic benefits generated during the construction phase, and also a significant one-off boost due to the profit generated by the sales of 18 units on the newly-extended park. The total value of these elements, as estimated by the proprietors, would be £435,000. Using the multipliers described in Para 3.18(a) (NB there would be no displacement effect for this type of expenditure), demonstrates an actual gross benefit of £550,275 – **equivalent to 10 FTE jobs being created temporarily during the construction and sales period.**
- 3.27 Furthermore, there would be an ongoing benefit to the local authority in terms of increased business rates levied on an extended Firth View Caravan Park. These additional benefits have not been quantified at this stage.
- 3.28 All of the above figures are scalable, should the completed Park extension have more or fewer than 18 accommodation units – each new unit would generate an annual local economic impact of £9,082 (0.16 FTE jobs).

4. Concluding Remarks

- 4.1 We have carried out this evaluation and assessment in an independent and detached manner. Our findings as outlined in the previous sections are presented as objectively as possible and not in a manner intended to sway judgement one way or another.
- 4.2 We believe that the methodology we have used to calculate economic benefit is robust, and that the statistical data we have drawn upon is the best and most up-to-date of its kind available.
- 4.3 Although we have been commissioned to undertake this study by the owners of Firth View Caravan Park, we have been placed under no pressure whatsoever by them, or any other party, to artificially inflate, alter or suppress any of our findings. Accordingly, we are confident that our findings are entirely impartial and capable of standing up to close statistical scrutiny.
- 4.4 Finally, we acknowledge with thanks the authors of the various research studies quoted herein.

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"Tourism and Leisure Knowledge"

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Consultancy & Project Management

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Fwd: Proposed extension to Firth View Caravan Park

① You replied on Mon 18/02/2019 15:21

SP

Mon 18/02/2019 15:16

You ↵

Hi Ken

This is the Gold Club.

It's our final letter.

Regards Stuart

Sent from my iPhone

Begin forwarded message:

From: [REDACTED]
Date: 18 February 2019 at 15:12:31 GMT
To: [REDACTED]
Subject: Proposed extension to Firth View Caravan Park

Dear Stuart,

I am writing on behalf of Mr Captain and his Committee to advise you that Millport Golf Club are most disappointed to be made aware of the planning refusal for the proposed expansion of Firth View Caravan.

Like so many other businesses on the Island we are very reliant on the Holiday Home Owners, Caravan owners and holiday makers for our business and our viability.

We work very hard at keeping the offering of Millport Golf Club available to local residents, holiday home owners and visitors alike and cannot over emphasize how important such developments as Firth View Park help reinforce our survival, To give you an idea in 2018 we had some 200 social members join us from the local caravan sites - important business indeed. We had over 1200 holiday makers/ visitors play the course in 2018 and our full membership consists of 80% second home / caravan owners. To be able to continue to provide a consistent and improved offering we need to increase this membership and clearly Firth View Caravan Park would help us greatly.

In the past month I am aware of two local golf clubs closing, diminishing even further this type of recreational tourism with the Ayrshire areas. The closures mainly due to lack of members.

High quality accommodation is just what Millport needs for all its businesses to survive and flourish - this unwillingness to allow more visitors to our Island seems outwith any economic sense.

I sincerely hope you are successful in an appeal process.

Please let me know if we can be of any assistance.

Yours sincerely,

[REDACTED]
[REDACTED]



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Fwd: Firth View Caravan Park extension

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Mon 18/02/2019 08:27

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Sent from my iPhone

Begin forwarded message:

From: [REDACTED]
Date: 17 February 2019 at 23:39:08 GMT
To: [REDACTED]
Subject: Firth View Caravan Park extension

To whom it may concern

I would like to show my support for the latest planning application submitted by Stuart Mellor.

As an owner of numerous businesses in Millport, I can easily say that the additional caravans which have already been opened at Firth View have been good for my convenience store, with a number of caravan owners also making use of the delivery service which we offer locally on the island. As well as my convenience store, I am a partner in the island's taxi firm, who often has calls for trips to/from Firth View.

My wife also owns a hairdressing business on the island and she too has seen an upturn in business from Firth View caravan owners and some of these have even become regular customers.

Any increase to the number of accommodation units available in the island can only be a good thing and help sustain our already fragile economy, especially in the quieter winter months. Firth View's extended season certainly helps on this front.

Regards

[REDACTED]

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Fraser's letter of support

WH Westbourne House <[REDACTED]>
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Sun 17/02/2019 16:26

You ↕

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From: [REDACTED]

Date: 17 February 2019 at 15:43:18 GMT

To: [REDACTED]

Subject: Letter of support

[REDACTED]

[REDACTED]

To whom it may concern;

I am writing this letter in support of the proposed extension of the Firth View Caravan Park on Cumbrae. I know the Westbourne caravan park well, over many years and many owners. The current owners have run a well organised and much respected business in the years since they first purchased Westbourne. I welcomed the first extension, Firth View, and believe it has been a great success adding to their business and also bringing benefits to the other businesses on the island. Personally in regards to our own business we welcome a great number of Westbourne and Firth Views customers throughout the year and enjoy the business that the site brings. With extended opening hours throughout the year and more modern and comfortable accommodation, what is a relatively short season for the town has been extended bringing economic benefits to the island whilst also providing a vast improvement in the quality and mix of accommodation available on the Cumbrae.

Yours faithfully,

[REDACTED]



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Fwd: More beds in Millport.

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Mon 11/02/2019 14:53
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Sent from my iPhone

Begin forwarded message:

From: [redacted]
Date: 11 February 2019 at 14:51:27 GMT
To: [redacted]
Subject: Fwd: More beds in Millport.

Sent from my iPhone

Begin forwarded message:

From: [redacted]
Date: 11 February 2019 at 07:47:18 GMT-5
To: [redacted]
Subject: More beds in Millport.

To whom it may concern.

I write as a landlord in Millport and know first hand the shortage of good holiday accommodation in the town.
 More caravans more beds more tourists brings much needed customers into the shops cafes pubs etc on the Island.
 I do hope the the extension to the Firth view Caravan site goes ahead and the sooner the better.

Yours sincerely

[redacted signature]

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Fwd: Caravan Park Extension

SP

Mon 11/02/2019 11:38

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Sent from my iPhone

Begin forwarded message:

From: [REDACTED]
Date: 4 Februarv 2019 at 11:48:31 GMT
To: [REDACTED]
Subject: Caravan Park Extension

Hi Stuart & Jane,

I was disappointed to learn that your planning application has been rejected.

Having more holiday makers on the island is a huge benefit to the majority of business on the island - from newsagents, gift shops, cycle shops, restaurants to electricians/plumbers etc.

It would certainly have increased the footfall into my own shop where I supply goods for mostly £1 (cleaning/stationery/hardware etc) and where I also stock, and earn commission from, local craft and postcards.

I really hope that you are able to successfully appeal this decision.

Kind regards,


[REDACTED]



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To whom it may concern

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Mon 11/02/2019 11:29

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Hi Ken

This letter is from [REDACTED] at the beauty salon.

Regards Stuart

To whom it may concern

I wish to confirm that I would welcome and support the proposed extension to Westbourne Caravan Park. These owners and visitors will almost certainly spend in the local shops, businesses and amenities. This will bring much needed income to our island's fragile economy, especially in the winter months now Firth View has a ten month licence.

[REDACTED]

Sent from my iPhone



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[REDACTED]

To Whom It May Concern,

I would like to raise my concern not only as a business owner, but as local resident of 29 years on the Island, regarding a recent decision to reject planning permission to expand a local caravan park, Westbourne Caravan Park.

To my understanding one of the reasons for your decision was that it would not be beneficial to the businesses on the Island?

As previously mention I have been a local business owner for many years now and have witnessed (not to mention been directly effected by) a steady decline of the tourist trade year on year and I truly believe the lack of suitable accommodation is one of key contributing factors to this unwanted trend.

I have no doubt, that majority of business on the Island share my view as many have commented over the years, the decrease in local business still trading is further evidence still of the negative impact, which needs to be addressed and any support from our local council would be welcomed by all.

With this in mind, I am astonished to hear and cannot see any justification why this was one of the factors to reject the Westbourne Caravan Parks application.

The proposed plan by the Westbourne Caravan Park to increase its available accommodation capacity could only bring positive change to the Island and its tourist trade and find it hard to believe that this would not be beneficial to both residents and business alike.

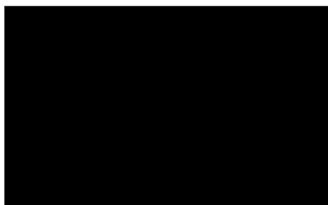
Thank you for your time and I hope that my concern can be addressed.

If you would like to discuss my concern further I would be more than happy to and can be contacted on the number above.

Kind Regards

[REDACTED]

Isle of Cumbrae Tourist Association



Mr Stuart Parry Mellor



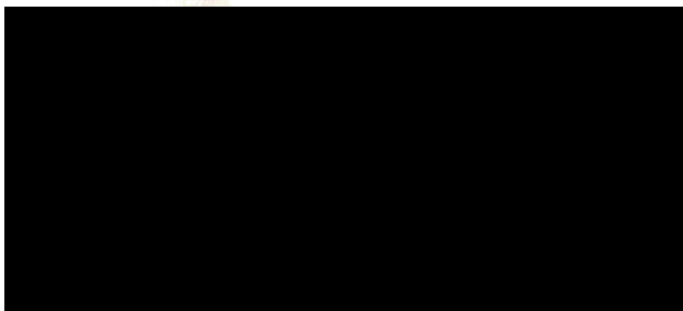
13th February, 2019.

Dear Mr Parry Mellor,

It has been brought to the Committee's attention that Planning Permission for the proposed extension to your site has been refused by North Ayrshire Council. We at the Tourist Association are extremely disappointed by the council's decision. Our association strive to increase the facilities on the island to encourage tourism and boost our struggling economy.

The Tourist Association feels that the decision to restrict the number of high quality caravans on your site is short sighted and detrimental to the island. We would wholeheartedly support your application and if we can be of any assistance please do not hesitate to contact us.

Yours sincerely



The Millport Gallery



Mr Stuart Mellor



17th February, 2019


Dear Mr Stuart Mellor,

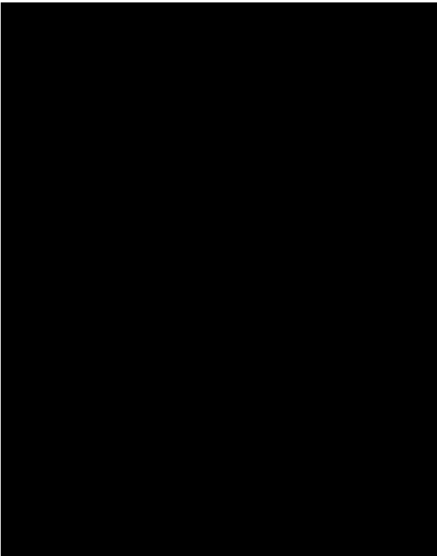
As a local business in Millport and an active committee member on both the Isle of Cumbrae Tourist Association and the Millport Golf Club Committee, I was shocked to learn that planning permission for the proposed extension to your site has been refused by North Ayrshire Council. We at the Tourist Association and the Golf Club are extremely disappointed by the council's decision at a time that NAC are pushing for more tourists and golfers to our island and are about to spend lots of money on our flood defence, and possibly a new Marina, yet you are rejected at the early drawing stages when you attempt to offer high quality accommodation and more beds on the island to encourage tourism and boost our struggling economy.

I just feel that the decision to restrict the number of high quality chalets and caravans on your site is short sighted and detrimental to encourage any new owners to the island, I'm also gobsmacked because as one drives from the Fintry end, Phase One of your holiday park looks stunning and freshly landscaped then the ground between the last caravans and the old bungalows looks unappealing and tired to the eye. And I have visual proof of this as I sell new droned aerial photographs of this view in my Gallery. I would happily let you have one to show to the Planners. I just wonder if the bungalow owners run up against this problem with the planning and owners of the Classic Victorian Sandstone Villas in Westbay Road when they wanted to build.

I would wholeheartedly support your application to enhance that corner strip of land and bring more people and money to our island, if I can be of any assistance please do not hesitate to contact me.

Yours sincerely






7 February 2019

To whom it may concern,

I was disappointed to see that the planning application for the extension to Firth View Caravan Park had been refused. The economy of the Isle of Cumbrae has been identified as “fragile” relying on tourism. Extending the caravan park would bring more, much needed, visitors to the island boosting sales for the local businesses. Sadly over the time that I have been a resident on the island, I have seen shops and café’s close and their buildings been converted into residential properties due to lack of sustainable business.

Having read the objections to the application, it would appear that a very small number of residents in the immediate vicinity to the proposed development have grouped together to raise objections, whilst not taking in to account the benefits of having additional visitors to island would have for the greater good of the local economy and businesses alike. The Firth View Caravan Park is kept immaculately clean and tidy. The caravan owners take pride in their caravan and site and keep it that way. These are the type of people that we want visiting the Island, more so than the day trippers that have no vested interest in keeping the island clean and tidy. Whilst it is true that the caravan owners do bring the majority of supplies with them from the mainland, they have little choice, we have no supermarket on the island. Recent applications from the Co-op which would have brought some much needed competition to the island and possibly a greater product range had its application blocked for an alcohol license, making it a non-viable option. However, daily fresh goods such as bread, milk, fresh baked rolls and pies are available on the island and would be attractive to the residents. Local tradesmen would also benefit from the caravan park, as I have done myself. The pubs and restaurants rely on visitors to the island as do the residents that are employed by them. Without the demand are we to see more business premises being turned into residential property and the town slowly die? I hope not. I hope that the decision to deny planning permission will be reconsidered and the greater good of the community taken into account.



Yours Sincerely





Wednesday 30th January 2019

To whom it may concern

I am writing in regards to the planning application submitted by Mr Stuart Mellor at 
 for a caravan park in a field that is an eyesore at the moment being refused.

As a local businessman selling window blinds to houses and caravans, I fail to understand how increasing a caravan park could not benefit most, if not all businesses on the Isle of Cumbrae and Largs town for that matter.

The increase in revenue to all businesses would help greatly on a small island where shops struggle. It may even help secure jobs and might even encourage other types of businesses to open, creating more job opportunities.

The fact that the caravan park is planned for basically a small field that is of no use to anyone else, which would enhance the area without spoiling any views at the end of Millport town, in nobody's way, not benefitting the island, beggars belief.

I sincerely hope someone sees sense soon.

Yours faithfully



REPORT OF HANDLING



North Ayrshire Council
Comhairle Siorrachd Àir a Tuath

Reference No:	19/00135/PP
Proposal:	Extension to existing caravan park to provide a further 18 stances together with alterations to the existing internal driveway, provision of bin stores and visitor car parking
Location:	Westbourne Caravan Park, West Bay Road, Millport, Isle Of Cumbrae KA28 0HA
LDP Allocation:	Countryside/Rural Community
LDP Policies:	TOU1 / ENV7 / General Policy /
Consultations:	Yes
Neighbour Notification:	Neighbour Notification carried out on 21.02.2019 Neighbour Notification expired on 14.03.2019
Advert:	Regulation 20 (1) Advert Published on:- 06.03.2019 Expired on:- 27.03.2019
Previous Applications:	None

Appeal History Of Site:

Relevant Development Plan Policies

TOU1

POLICY TOU 1: TOURIST ACCOMMODATION AND FACILITIES

Proposals to create or extend tourist facilities, hotels, boarding houses, bed and breakfast facilities and guesthouses, within Class 7, and managed units (see glossary) shall generally accord with the LDP where the proposed site is within a settlement boundary.

Proposals for such development in the Countryside shall accord with the LDP provided:

- (a) the development is an existing building suitable for conversion; OR
- (b) development can demonstrate a site specific locational need; AND

(c) there is a social and/or economic benefit to the area; AND

(d) it is of a scale and character which is not detrimental to the amenity and landscape of the area.

Where the proposal is for an individual tourism accommodation unit and the unit is not clearly allied to a tourist facility, the proposal is unlikely to be supported. The proposal must be compatible with the underlying land use and appropriate in design and scale to surrounding uses.

Restrictions to retain tourism use are likely to be required where this has formed the justification for development in the countryside - this may be secured via legal agreement if appropriate. Proposals for staff accommodation will only be acceptable where an operational need for staff to be located on site has been demonstrated (and is not merely for convenience) and this will be secured via legal agreement (see Policy ENV 2 for further details).

ENV7

POLICY ENV 7: SPECIAL LANDSCAPE AREAS

Within the identified Special Landscape Area, which includes the National Scenic Area in

North and Central Arran and Clyde Muirshiel Regional Park, as defined on the LDP Map,

the Council shall pay special attention to the desirability of safeguarding or enhancing the

character or appearance of the landscape in the determination of proposals.

Development

should be sited so as to avoid adverse impacts upon wild land. There is a presumption

against development in these areas unless it can be demonstrated that the proposal:

(a) meets the needs of agriculture or forestry; OR

(b) is a recreation, leisure or tourism proposal which will bring a level of social and economic benefit to the area which outweighs the need to protect the area from development; OR

(c) is a renewable energy generation development; AND

(d) is appropriate in design and scale to its surroundings; AND

(e) has no unacceptable direct, indirect or cumulative impacts on the landscape character

and/or the natural and built heritage resource; AND

(f) has no unacceptable impacts on the visual amenity of the area; AND

(g) has taken cognisance of the Council's Rural Design Guidance, where applicable.

In addition to the above criteria, proposals for development which would affect the National

Scenic Area, as identified on the LDP Map, shall not accord with the LDP unless:

(h) the objectives of designation and the overall integrity of the National Scenic Area will

not be compromised; OR

(i) any significant adverse impacts on the qualities for which the National Scenic Area has

been designated are clearly outweighed by social or economic benefits of national importance.

General Policy GENERAL POLICY

(a) Siting, Design and External Appearance:

- Siting of development should have regard to the relationship of the development to existing buildings and the visual effects of the development on the surrounding area and landscape.
- Design should have regard to existing townscape and consideration should be given to size, scale, form, massing, height, and density.
- External appearance should have regard to the locality in terms of style, fenestration, materials and colours.
- Development will require to incorporate the principles of 'Designing Streets' and 'Designing Places'.
- The particularly unique setting of North Ayrshire's rural, coastal, neighbourhood and town centre areas, and those with similar characteristics, necessitates that all development proposals reflect specific design principles unique to these areas. Coastal, Rural, Neighbourhood and Town Centre Design Guidance (four separate documents) are Supplementary Guidance to the Plan and contain further details.
- Consideration should be given to proper planning of the area and the avoidance of piecemeal and backland development.
- Design should have regard to the need to reduce carbon emissions within new buildings.

(b) Amenity:

Development should have regard to the character of the area in which it is located.

Regard should be given to the impact on amenity of:

- Lighting;
- Levels and effects of noise and vibration;
- Smell or fumes;
- Levels and effects of emissions including smoke, soot, ash, dust and grit or any other environmental pollution;
- Disturbance by reason of vehicular or pedestrian traffic.

Development should avoid significant adverse impact on biodiversity and upon natural heritage resources, including those outwith designated sites and within the wider countryside. Development proposals should further have regard to the preservation and

planting of trees and hedgerows, and should also have regard to their potential to contribute to national and local green network objectives.

In relation to neighbouring properties regard should be taken of privacy, sunlight and daylight.

(c) Landscape Character:

In the case of development on edge of settlement sites, substantial structure planting will generally be required to ensure an appropriate boundary between town and country is provided. Such proposals should include native tree planting, retain natural features where possible and make provision for future maintenance. Development should seek to protect the landscape character from insensitive development and the Ayrshire Landscape Character Assessment shall be used to assist assessment of significant proposals.

(d) Access, Road Layout, Parking Provision:

Access on foot, by cycle, by public transport and other forms of transport should be an integral part of any significant development proposal. Development should have regard to North Ayrshire Council's Roads Development Guidelines and meet access, internal road layout and parking requirements.

(e) Safeguarding Zones:

Pipelines, airports and certain other sites have designated safeguarding areas associated with them where specific consultation is required in assessing planning applications. The objective is to ensure that no development takes place which is incompatible from a safety viewpoint. The need for consultation within Safeguarding Zones is identified when an application is submitted. Supporting Information Paper No. 7 provides further information on Safeguarding Zones.

(f) The Precautionary Principle

The precautionary principle may be adopted where there are good scientific, engineering, health or other grounds for judging that a development could cause significant irreversible damage to the environment, existing development or any proposed development, including the application itself.

g) Infrastructure and Developer Contributions

For development proposals which create a need for new or improved public services, facilities or infrastructure, and where it is proposed that planning permission be granted, the Council will seek from the developer a fair and reasonable contribution in cash or kind towards these additional costs or requirements. Developer contributions, where required,
19/00135/PP

will be sought through planning conditions or, where this is not feasible, planning or other legal agreements where the tests in Circular 3/2012 are met. Other potential adverse

impacts of any development proposal will normally be addressed by planning condition(s)

but may also require a contribution secured by agreement.

This will emerge from assessment of the impact of development proposals upon:

- Education;
- Healthcare facilities;
- Transportation and Access;
- Infrastructure;
- Strategic landscaping; and,
- Play facilities.

Further to analysis of infrastructure, indicative requirements for housing land allocations

are set out within the Action Programme. Developer contributions will be further established by Supplementary Guidance (timing, costs etc.).

In addition to the above, Mixed Use Employment Areas are identified within the LDP. These sites are allocated for a mix of uses, subject to an element of employment space

creation or improvement being provided. This will be informed by a business plan and

masterplan. In these specific cases, contributions to the above (and affordable housing

requirements as set out in Section 5) will also be required.

h) 'Natura 2000' Sites

Any development likely to have an adverse effect on the integrity of a 'Natura 2000' site

will only be approved if it can be demonstrated, by means of an 'appropriate assessment',

that the integrity of the 'Natura 2000' site will not be significantly adversely affected.

i) Waste Management

Applications for development which constitutes "national" or "major" development under

the terms of the Planning Etc. (Scotland) Act 2006 will require the preparation of a Site

Waste Management Plan (SWMP), which will be secured by a condition of the planning consent.

Description

This application seeks planning permission for an extension to an existing caravan park at Westbourne, West Bay Road, Millport, to create a further 18 caravan stances. The existing caravan park comprises of two elements; Westbourne Caravan Park, the original facility based around Westbourne House, and Firth View Caravan Park, an extension to Westbourne Caravan Park which was granted planning permission in 2016 (ref. 15/00699/PP). The site is to the southeast of the Firth View Caravan Park on the landward side of West Bay Road and relates to agricultural land which covers an area of approximately 0.56 ha. The site occupies part of the field which currently separates the caravan park from the edge of the settlement of Millport.

The proposed extension would join onto the southeast side of the existing park and would require the relocation of the existing screening mound. This would be re-formed on the southern and western boundaries of the proposed extended site. The mound would be planted with Hawthorn and Escalonia. Access to the extended site would be taken from the existing internal road within the caravan park and would extend the existing loop road layout. Likewise, the existing site layout comprising of three rows of caravans would also be replicated in the new extension. The site would also contain a bin store and ten visitor parking spaces.

The application site is within an area of countryside as identified within the adopted Local Development Plan (LDP). Policy TOU 1 of the LDP relates to Tourist Accommodation and Facilities, which states that proposals to create or extend tourist facilities, hotels, boarding houses, bed and breakfast facilities and guesthouses, within Class 7, and managed units shall generally accord with the LDP where the proposed site is within a settlement boundary. Proposals for such development in the countryside shall accord with the LDP provided:

- (a) the development is an existing building suitable for conversion; or
- (b) development can demonstrate a site specific locational need; and
- (c) there is a social and/or economic benefit to the area; and
- (d) it is of a scale and character which is not detrimental to the amenity and landscape of the area.

Proposals shall be compatible with the underlying land use and appropriate in design and scale to surrounding uses.

The application site is located within a Special Landscape Area (SLA), therefore the proposal requires to be assessed against Policy ENV 7 of the LDP that relates to Special Landscape Areas. The proposal also requires to be assessed against the General Policy of the LDP.

In January 2019 an application for an extension to the caravan park comprising of 34 new stances was refused (18/00984/PP). This application related to a larger site than the current application and would have occupied the entire field which currently separates the caravans from the edge of the settlement of Millport. That application was refused as it would have resulted in coalescence between the settlement of Millport and the caravan parks in the form of ribbon development along West Bay Road. No economic or social justification was provided demonstrating the need for

an additional static caravan park or for the need for it to be located on this specific site. The combined scale of the existing caravan parks combined with the extension would have been excessive and would have had a negative impact on the special landscape character and on the appearance of Great Cumbrae.

Following this refusal, the applicant sought pre-application advice in relation to a smaller expansion of the caravan park comprising of 18 stances (19/00046/PREAPP). The applicant was advised that the reduced scheme would still be unlikely to comply with the relevant policies as it would have similar issues that the larger scheme would have had in terms of coalescence, ribbon development, excessive combined scale and impact on the special landscape area.

Consultations and Representations

The application was published in a local newspaper for publicity purposes. Nineteen letters of objection have been received, with the points raised summarised below:

1. The proposed development would result in coalescence of Millport and the caravan park and would be ribbon development along West Bay Road.

Response: Agreed - this matter is addressed in full in the Analysis section of this report.

2. The proposal would lead to the loss of open space and farmland within a Special Landscape Area. There is a concern that if this application is permitted, there would soon be another planning application for a further expansion into the rest of the field resulting in a similar number of stances to what was previously refused.

Response: It is agreed that this will lead to a loss of open space - this matter is addressed in full in the Analysis section of this report. Further loss of open space between the site and Millport could be difficult to resist if the space was eroded to an unsustainable size.

3. Caravan residents do not pay Council tax but use council services.

Response: This matter is not a material planning consideration.

4. The scale and appearance of the development would be out of character and would be detrimental to the appearance of the area.

Response: Agreed - this matter is addressed in full in the Analysis section of this report.

5. The additional residents would put pressure on the ferries which already struggle at certain times with the volume of traffic.

Response: It is not considered that the proposal would have a significant impact on the capacity of the ferries during peak hours.

6. No site specific locational need has been demonstrated and there are plenty of other available sites on the island which would have a lesser impact.

Response: It is agreed that no site specific location need has been demonstrated - this matter is addressed in full in the Analysis section of this report.

7. The proposed development would have a negative impact on tourism to the island.

Response: One of the reasons for the popularity of Great Cumbrae as a tourist destination is because of its natural beauty and relatively rural and wild landscape in relation to its proximity to Glasgow. The proposed development would have a negative effect on the natural appearance of the island because it would erode the separation between town and countryside.

8. The proposed development would affect the privacy of its neighbours. The location of the bin store would harm the amenity of existing caravans.

Response: There are no immediate neighbours to the site other than other caravan stances at Firthview where a lesser degree of privacy would be expected than would be for a dwellinghouse. It is not considered that the bin store is located too close to the surrounding caravans. Planning conditions could be used to ensure a suitably designed bin store which would not be detrimental to the amenity of surrounding caravans.

9. No facilities have been provided (public toilets, playparks, shops, street lighting). There is a lack of detail in the application with regards to drainage, sewerage treatment, lighting, etc. Insufficient screening is proposed. Archaeological works should be carried out prior to the development of the site.

Response: It is agreed that for a caravan park of the size proposed there is a lack of facilities, although its proximity to Millport could mean fewer facilities would be required. Some of these issues could be addressed including details of landscaping/screening via condition if the proposal were otherwise acceptable. The West of Scotland Archaeology Service raised no objections subject to conditions.

10. The proposal would negatively affect the property market in Millport and would have no economic benefit.

Response: The impact on the local property market is not a material planning consideration. The potential economic benefit is considered in the Analysis section.

11. Views from existing caravans would be compromised.

Response: Loss of view is not a material planning consideration.

12. The proposal would lead to road safety issues.

Response: No new access is proposed and there would be no significant road safety issues associated with the proposed development.

13. One objector objects to not receiving neighbour notification.

Response: The standard neighbour notification process was undertaken, and additionally objectors to the previous application were notified.

The applicant has provided ten letters of support in support of the application. The points raised in the letters of support are summarised below:

1. The park extension would have an economic benefit because the residents would spend money in the local area and support local businesses.

Response: The applicant has provided an Economic Impact Analysis which suggests that the proposed extension would have an economic benefit to the local area, however, the economic benefit would not outweigh the other considerations with regards to coalescence, ribbon development, excessive combined scale and impact on the special landscape area. It is also considered that the effect that the proposed development would have on the natural beauty of Great Cumbrae may discourage tourism (particularly day tourists/cyclists) which may have a negative economic impact on the island.

2. There is a shortage of holiday accommodation in Millport; the proposed extension would improve the quality and mix of accommodation available on Cumbrae.

Response: Any shortage of holiday accommodation has not been demonstrated. There are extensive existing facilities for static caravans on Cumbrae (72 on site and 170 at Millport Holiday Park). The proposed caravan park extension would not significantly improve upon the quality or mix of the accommodation available on Great Cumbrae.

3. The existing caravan park looks appealing and well landscaped and the extension would enhance the appearance of the area.

Response: It is not considered that the proposed extension to the caravan park would enhance the appearance of the area because of the issues of coalescence, ribbon development, excessive combined scale and impact on the special landscape area, and it is not considered that these impacts could be mitigated through landscaping.

4. The park extension would be located on a small field which is not of any use.

Response: While the field may not be in active agricultural use it functions as a buffer between the settlement of Millport and the caravan park. It also contributes to the appearance of the special landscape area due to its open and semi-natural character.

Consultations:

West of Scotland Archaeology Service: No objections subject to conditions.

Cumbrae Community Council: The application should be determined against the relevant policies of the LDP as explained in the report of the previous application (18/00984/PP).

Analysis

The application site is located within an area of countryside that is also a Special Landscape Area of Great Cumbrae Island as identified in the adopted LDP. The main determining issues are whether the proposal complies with Policies TOU 1, ENV 7 and the relevant criteria of the General Policy of the LDP.

Holiday static caravans meet the LDP glossary definition of 'managed units' and therefore the principle of such development in the countryside requires to be
19/00135/PP

considered under Policy TOU 1 of the LDP, which relates to Tourist Accommodation and Facilities. This policy has a presumption in favour of tourist accommodation, recognising its value to the local economy and job creation.

Criterion (a) of Policy TOU 1 is not applicable as it relates to the conversion of existing buildings, however criteria (b), (c) and (d) of the policy are applicable. With regard to criteria (b) (site specific locational need), the Westbourne Caravan Park has operated for many years. It has recently been expanded significantly, with the extension being named Firth View Caravan Park. This proposal would see another significant expansion. The applicant has not provided any information to demonstrate a site specific locational need. Given the extensive existing facilities for static caravans on Cumbrae (72 on site and 170 at Millport Holiday Park), and the availability of other sites, it is not considered that there is any site specific locational need for the proposed development. The proposal would not therefore accord with criterion (b).

Criterion (c) states that new tourist accommodation in the countryside must have a social and/or economic benefit to the area. The applicant has provided an Economic Impact Analysis which suggests that up to five part time or seasonal jobs could be created in the local area because of the proposed expansion. In addition, the extension would create a short term economic boost during construction and would benefit the local authority in terms of increased business rates levied on the park. No information has been provided to demonstrate a social benefit to the area. The applicant has demonstrated that the proposed park extension would have an economic benefit, albeit limited, to the island and so the proposal complies with criterion (c).

Criterion (d) states that development should be of a scale and character which is not detrimental to the amenity and landscape of the area. In terms of scale, the proposal is for an additional 18 caravan stances and it would occupy a site area of 0.56ha. The field which currently separates the caravan park from the edge of Millport measures 1.2ha and so the extension would occupy just under half of this field. The previous extension (Firth View) was a site of 0.89ha for 40 caravans while the original park (Westbourne) was on a site of approximately 1.3ha for 32 caravans and 8 chalets. The previous extension therefore roughly doubled the size and capacity of the original park and the proposed extension would result in another significant expansion within a short period of time. In terms of the character of the development, it would be a standard caravan park of a similar style to the existing. Therefore, in terms of landscape and amenity impacts, the combination of the original park and two extensions would be of unacceptable scale in the context of a small island. The proposal would therefore be contrary to criterion (d).

In conclusion, criterion (a) of policy TOU 1 does not apply to the proposal, and it is contrary to criteria (b) and (d). Although the policy does comply with criterion (c), the economic benefit would not outweigh the other considerations with regards to the lack of a site specific locational need and the negative impact of the scale of the development on the amenity and landscape of the area and so the proposal is contrary to policy TOU 1.

Policy ENV 7 displays a presumption against development in Special Landscape areas unless it can be demonstrated that the proposal:

(a) Meets the needs of agriculture or forestry; or

- (b) Is a recreation, leisure or tourism proposal which will bring a level of social and economic benefit to the area which outweighs the need to protect the area from development; or
- (c) Is a renewable energy generation development.

The proposal is a tourism proposal and therefore criteria (b) applies. While the proposal would have an economic benefit, it is not considered that this would outweigh the need to protect the area from development; furthermore, it is not expected that there would be any social benefit. The proposed development site is on the southwest coast of the island, just beyond the edge of Millport in an area of particular natural beauty. The agricultural land currently acts as a green 'buffer' between the edge of Millport and the existing caravan parks. The edge of the settlement of Millport is currently clearly defined, and the application site lies outwith in a countryside allocation.

While the size of the proposed park extension has been reduced from the previous refused application to retain an area of open space between Millport and the caravan park, it is not considered that the size of the area of field left undeveloped would be large enough to act as an effective buffer. The area of field left undeveloped would be read as a gap site rather than an area of open countryside and it could be difficult to protect it against further development. Development of this site would lead to a visual coalescence of Millport and the existing caravan parks and would remove what is currently a well-defined boundary between town and countryside on Great Cumbrae. For the above reasons the proposal would be contrary to policy ENV 7.

In terms of the General Policy, criterion (a) refers to siting, design and external appearance. The siting would be inappropriate because of the aforementioned issue of visual coalescence between Millport and the existing caravan park. The resultant scale of the combined caravan parks would be excessive within the small island context of Great Cumbrae. The external appearance would be significantly detrimental when leaving Millport along West Bay Road with an undesirable form of ribbon development along West Bay Road, which would detract from the appearance of the area, specifically the visitor experience of cycling or walking around the island. The scale of the combined park would also be particularly noticeable when viewed from the Firth of Clyde as the site is highly visible to boats entering the straights between Great Cumbrae and Bute. The applicant has proposed a planted mound to the south and west as screening, however, the degree to which such mitigation would potentially impact on landscape character would not resolve the main issue of coalescence. The proposal is therefore contrary to criterion (a).

In regard to criterion (b), there would be no issues of overlooking or overshadowing of neighbours as there are no nearby dwellinghouses. In terms of the wider amenity impacts, i.e. the effects of ribbon development and visual impact on the Special Landscape Area, the proposal would not accord with criterion (b).

In regard to criterion (c), and as discussed above, the proposed development would be on the edge of the settlement and would through its scale, siting and design disrupt the clearly defined separation between town and countryside which currently exists. It would not be possible to mitigate this effect through planting or any other method. The proposal is therefore contrary to criterion (c).

The proposed park extension would take its access from the existing internal loop road of Firth View Caravan Park. This is an improvement on the refused scheme which proposed a separate access for the extension. The proposal is considered to accord with criterion (d).

The proposed development would be contrary to Policies TOU 1, ENV 7 and criteria (a), (b), and (c) of the General Policy of the Local Development Plan. Therefore, it is recommended that planning permission is refused.


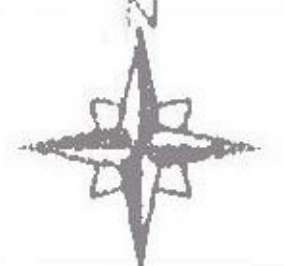
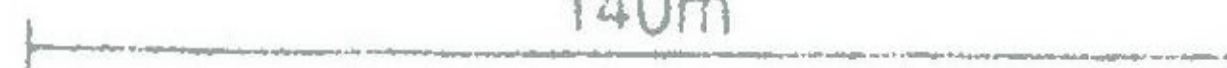
Decision

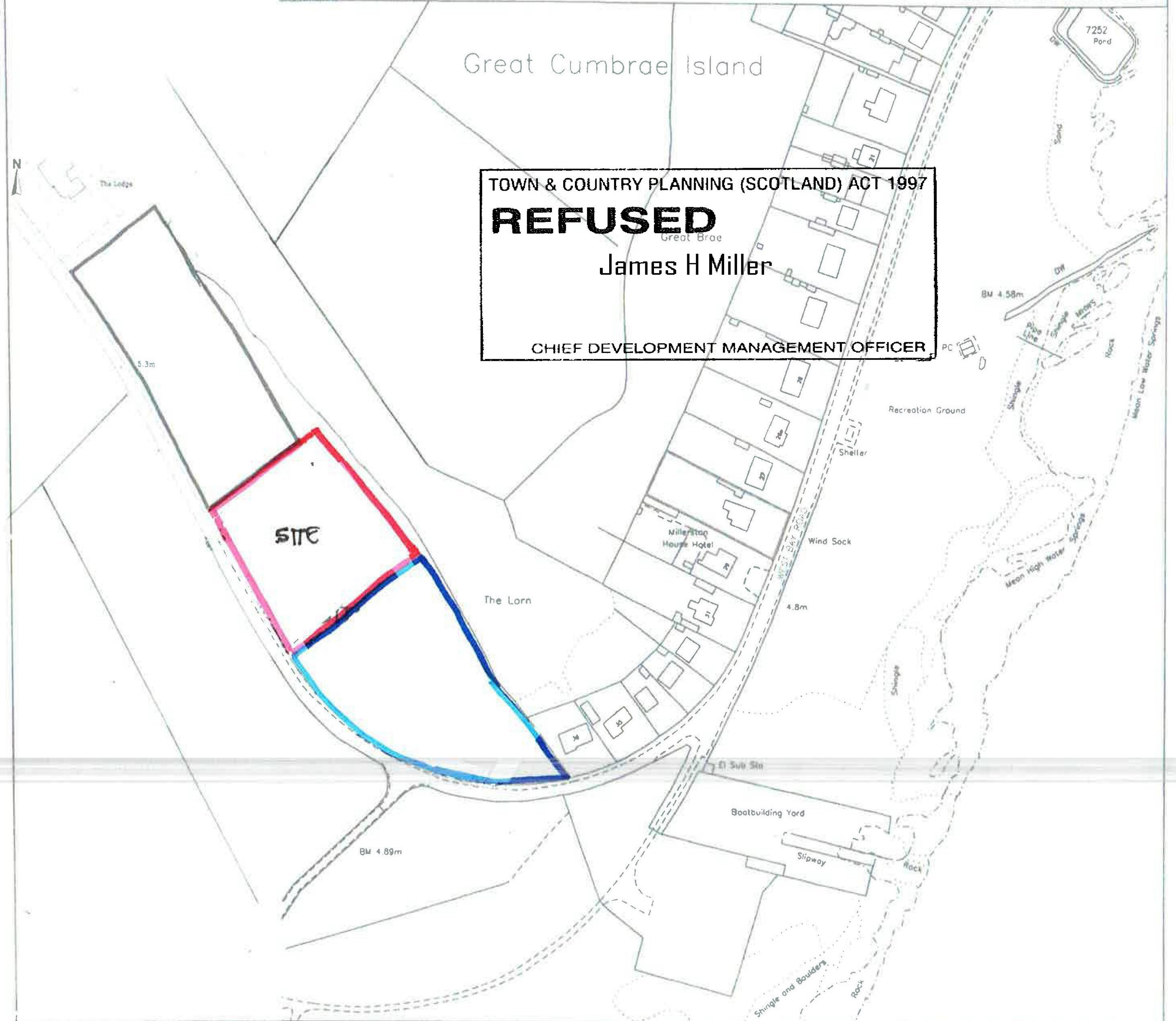
Refused

Case Officer - Mr John Mack

Appendix 1 - Drawings relating to decision

Drawing Title	Drawing Reference (if applicable)	Drawing Version (if applicable)
Block Plan / Site Plan	001	
Location Plan	003	
Block Plan / Site Plan	002	

 LAND REGISTER OF SCOTLAND	Officer's ID / Date	TITLE NUMBER
	9995 13/7/2010	BUT1507
 ORDNANCE SURVEY NATIONAL GRID REFERENCE	 140m	
NS1554	Survey Scale	
1/2500		
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robertson design practice,
 st. vincent's lodge, middlepenny road, langbank.
 tel. 01475 540554 e-mail robertsondesign@hotmail.com

client: Westbourne Caravan Park, Millport

project: Extension to caravan park.

title: Location plan.

job no. 1829 drg. no. 003 scale: 1:2500 drawn: PKR date: 01/11/18



North Ayrshire Council
Comhairle Siorrachd Àir a Tuath

KAREN YEOMANS : Executive Director (Economy & Communities)

No N/19/00135/PP

(Original Application No. N/100154285-001)

Type of Application: Local Application

REFUSAL OF PLANNING PERMISSION

**TOWN AND COUNTRY PLANNING (SCOTLAND) ACT, 1997,
AS AMENDED BY THE PLANNING ETC (SCOTLAND) ACT 2006.
TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (SCOTLAND)
REGULATIONS 2013**

To : Mr Stuart Parry-Mellor
c/o Robertson Design Practice Fao Peter K Robertson
St Vincents Lodge
Middlepenny Road
Langbank
PA14 6XB

With reference to your application received on 21 February 2019 for planning permission under the above mentioned Acts and Orders for :-

Extension to existing caravan park to provide a further 18 stances together with alterations to the existing internal driveway, provision of bin stores and visitor car parking

at Westbourne Caravan Park
West Bay Road
Millport
Isle Of Cumbrae
KA28 0HA

North Ayrshire Council in exercise of their powers under the above-mentioned Acts and Orders hereby refuse planning permission on the following grounds :-

1. The proposed development would be contrary to Policies TOU 1, ENV 7 and criteria (a), (b), and (c) of the General Policy of the Local Development Plan in that it would result in visual coalescence between the settlement of Millport and the caravan parks in the form of ribbon development along West Bay Road. The combined scale of the existing caravan parks with the proposed development would have a significant negative impact on both the designated Special Landscape Area, and the wider special landscape character and appearance of Great Cumbrae.

Dated this : 2 April 2019

.....
for the North Ayrshire Council

(See accompanying notes)



North Ayrshire Council
Comhairle Siorrachd Àir a Tuath

TOWN AND COUNTRY PLANNING (SCOTLAND) ACT 1997
AS AMENDED BY THE PLANNING ETC (SCOTLAND) ACT 2006.
TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (SCOTLAND)
REGULATIONS 2013 – REGULATION 28

KAREN YEOMANS : Executive Director (Economy & Communities)

FORM 2

1. If the applicant is aggrieved by the decision to refuse permission for or approval required by a condition in respect of the proposed development, or to grant permission or approval subject to conditions, the applicant may require the planning authority to review the case under section 43A of the Town and Country Planning (Scotland) Act 1997 within three months from the date of this notice. The notice of review should be addressed to Committee Services, Chief Executive's Department, Cunninghame House, Irvine, North Ayrshire, KA12 8EE.
2. If permission to develop land is refused or granted subject to conditions and the owner of the land claims that the land has become incapable of reasonably beneficial use in its existing state and cannot be rendered capable of reasonably beneficial use by the carrying out of any development which has been or would be permitted, the owner of the land may serve on the planning authority a purchase notice requiring the purchase of the owner of the land's interest in the land in accordance with Part 5 of the Town and Country Planning (Scotland) Act 1997.

Euan Gray (Committee Services Officer / C'tee & Member Services)

From: [REDACTED]
Sent: 18 June 2019 17:20
To: Euan Gray (Committee Services Officer / C'tee & Member Services)
Subject: Planning Application:19/00135/PP Caravan Park

Dear Sir

I received the Notice of Review for the above planning application and would like the following comments, in addition to those I have already registered with the Planning Department, to be noted:

- The Applicant, by requesting a Review of the planning decision, is calling into question the professional judgement of the planning staff. The Planning staff have a job to do and if their judgement and recommendations are overturned it makes a mockery of their decisions and qualifications. Their decisions are based on statutory / legal requirements / factual information and objector comments.
- There is over provision of caravans (for sale or rent/hire) already in Millport. There are still some caravans for sale on the original plot suggesting there's little or no appetite for purchase of these remaining caravans. Having more caravans would only exacerbate the issue of over provision.
- Previous comment from another objector, whom I believe is an owner of one of these caravans, stated the applicant has misled them as to his intentions of increasing the numbers of caravans on the site. The applicant has still to honour some of the existing conditions of the first phase of the planning approval. The applicant is "having a laugh" at the Council's expense. In addition to the extra work this Notice of Review is generating the applicant is mocking the planning process and the professional staff recommendations. My Council Tax monies should be spent on far better things than paying Council staff to re do their work especially when the occupants of the caravans pay no Council Tax!
- Finally the grounds for refusal as noted in the Refusal of Planning Decision letter dated 2 April 2019 remains:
i.e. the proposed development would be contrary to Policies TOU 1, ENV 7 and criteria (a), (b), and (c) of the General Policy of the Local Development Plan in that it would result in visual coalescence between the settlement of Millport and the caravan parks in the form of ribbon development along West Bay Road. The combined scale of the existing caravan parks with the proposed development would have a significant negative impact on both the designated Special Landscape Area, and the wider special landscape character and appearance of Great Cumbrae.

Regards
[REDACTED]

Sent from [Mail](#) for Windows 10

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18 June 2019

Euan Gray
Committee Services Officer
North Ayrshire Council
Cunninghame House
Irvine
KA12 8EE

Dear Mr Gray,

Planning Application: 19/00135/PP: Westbourne Caravan Park

Further to your letter of 12th June advising of the submission of a Notice of Review I have the following comments that I wish to be considered.

In line with previous decisions taken by the Council, I trust that a further sensible decision to refuse permission for 18 more caravans will be upheld.

This strip of rural landscape has already been desecrated by the unsightly rows of existing caravans, which are almost on the pavement. The road is used by young cyclists and walkers who enjoy the scenery without the worry of even more cars streaming out of an extended caravan site. To allow a continuation to the site would be disastrous to the character of the green area.

The application still does not address the negative impact on the Special Landscape Area and the appearance of Great Cumbrae. The prime objective of the application, in my view, is to generate profits for the owner and not to create something of benefit for the community.

The applicant's continual refusal to accept Council's decision is causing undue stress and upset for the nearby residents. There now has to be acknowledgement that the site is not suitable, nor wanted, for an extended caravan park.

Yours sincerely,



BUSINESS

24 JUN 2019

SUPPORT

FAD

MR. JOHN MACK.

PLANNING DEPT.

NORTH Ayrshire Council

CUNNINGHAME HOUSE

IRVINE KA12 8EE

21-6-2019.

Dear Sir,

Once again my husband and I wish to object to the planning application No. N/19/00135/PP. at Westbourne caravan park, West bay Road, Millport Isle of Arran KA 28 0HA.

As stated in all other correspondence to your department regarding the above application, it has been brought to our notice this applicant has since encouraged to further set up a camping area in extremely close proximity to our dwelling house, and to which the fire services have been called to deal with regarding the setting up of wild fire area.

Once again for environmental reasons, inadequate infrastructure of this proposal, disregard for this green belt area, also the beauty and preservation of nature, we would ask that you further to - accept our objection regarding the above, for all who wish to visit or live in and on this beautiful island for the present and future,

Yours faithfully

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

24 June 2019

Dear Sir / Madam

My objections to planning application N/19/00135/PP Extension to Firth View Caravan site were submitted in my letter to you dated 6 March 2019. In response to the appeal made by the applicant, I would now like to add the following points:

1. It is my understanding that Local Authorities are obliged by law to decide planning applications in accordance with the development plan for the area. Coming to a reasoned judgement on these matters lies at the heart of the planning authority's discretionary power to approve, refuse or modify applications under the law and within a framework of national policy guidance. This process was duly followed and the application to refuse planning permission to extend Firth View caravan site was refused on the grounds of, *'The proposed development would be contrary to policies TOU1, ENV 7 and criteria a, b and c of the General Policy of the Local Development Plan in that it would result in visual coalescence between the settlement of Millport and the caravan parks in the form of ribbon development along West Bay Road. The combined scale of the existing caravan parks with the proposed development would have a significant negative impact on both the designated Special Landscape Area, and the wider special landscape character and appearance of Great Cumbrae.'*

Although within the right to appeal there is an opportunity to submit additional evidence in support of an application, it appears that the supporting evidence submitted in this appeal is identical to the evidence and letters of support submitted with the original application which was refused. The size and character of the proposed extension remains the same and therefore the reasons for refusal stated above remain. I would therefore deem this appeal a waste of the LRB's time, and the decision to refuse permission made under delegated powers, should be upheld.

2. I also note that the reason for an appeal states *'Further economic and social justification with precedent information.'*

In re- reading the Economic Impact Analysis prepared by Talk Associates (used as evidence with original application and not additional evidence) I would like to highlight the fact that this report is, with very small amendments, identical to the Economic Report submitted in support of an extension to Seaview Caravan site in Seamill in February 2018! Given that this report is published by a company whose sole reason for existence is to promote and support the caravan industry, and uses data published by the Scottish Caravan and Camping Forum, I would question its impartiality!

I notice that the applicant is claiming that the planning officer who made this decision was unfamiliar with the site and to a great extent, the economy of the island yet he puts great faith in a report written by a company based in Fife!

Regarding the reference to precedence information my non-expert view is that Policy over-rides Precedence! It appears that the first rule in town planning is – there is no precedence! Each planning application must be considered on its own merits, facts and circumstances. This has been done and has been found to contravene the LDP and therefore planning permission refused.

The applicant claims that *‘.....the site is within the Special Landscape Area of Great Cumbrae, I would contend that this designation has been placed as a blanket over the island without consideration of the character of all the areas so covered.’* This challenge shows an ignorant selfish disregard for a policy put in place to protect places of natural beauty. The site of this proposal is on the outer road around the perimeter of the island which is one of the main attractions of the island and enjoyed by residents and hundreds of thousands of visitors and the reason that it was assessed as being within a special landscape area!

If, as the applicant would like us to believe, that there is precedence in planning, then the whole of road round the island is in danger of being developed which would be the ruination of Cumbrae – or is this exception only to be made for this applicant?

The applicant states that his revised scheme is of a scale and character which is not detrimental to the amenity and landscape of the area and that *‘the cumulative capacity of the existing and proposed numbers would be significantly less than the capacity of the main caravan park on the island.’*

The main caravan site is in Golf Road and is not visible from the main road round the island. As you will see from the aerial photograph below, copied from the Firth View FB profile page, the cumulative effect of the existing developments around Westbourne is vast. Although the proposed site is less dense than the original Firth View Site it has greater length and, together with Westbourne caravan site and the chalets, has become a major out-of-town development. To extend it even further is most certainly detrimental to the amenity and landscape of the area, to the island and the town of Millport itself.



4. In the appeal statement it is stated that *'Given the demand, the owners again approached the planning officer at North Ayrshire Council, with whom they had previous dialogue, and who had dealt with the previous application. They discussed a further extension within the remaining portion of the field and received a positive response, although they were advised to leave a small area between the existing houses in West Bay and the first caravans of the new development.'*

On the strength of this advice the owners entered into a contract to purchase the remaining section of the field and instructed the preparation and submission of a planning application to reflect the conclusions of the earlier discussions.'

Although this application was submitted in November 2018, and the current application under review submitted in February 2019, it was stated in both planning application forms that the owner of the land was Mr McIntyre, Breakough Farm and the sale was not completed until after the refusal of the February application. It can only therefore be assumed that the sale was completed in the applicant's belief that being the landowner would give greater weight in his forcing through this appeal.

5. It is claimed that this extension would bring economic benefit to the island but in considering economic impacts the potential negative impact should also be taken into account such as flats not selling within the defined town, pressure and additional cost of local services and resources. If the countryside of Millport is to be filled with ever larger caravan parks this will have a negative impact not only on a special landscape area but on the sale of flats / houses within the town which in turn will lead to a downward spiral and potential dereliction of buildings within a conservation area as can be seen in other town centres. This in turn could affect the number of tourists visiting and have a longer-term detrimental effect on the island's economy.

The person with most financial gain from this development is the applicant, and a few retail businesses gaining as a result of an ever-increasing number of caravans on Cumbrae, will not lead to improvements in the town for the resident community.

6. Finally it is stated in the Report of Handling that if this development goes ahead then *'the area of field left undeveloped would be read as a gap site rather than an area of open countryside and it could be difficult to protect it against further development.'*

In response to the above statement, written by a qualified planner, the applicant states that *'the planning authority have the ability to resist such pressure and that there is no intention of seeking a further consent at a later date if this appeal were to be upheld.'*

Given that the applicant stated to near-by residents, when the initial application for Firth View was made in 2016, that he had no intention of ever increasing the proposed site I have difficulty in believing his claim. We are reasonable people and understood the reasons for this first extension and, given his assurances to us, and later I believe to some purchasers of caravans, we did not object to this application. It is to our regret that we did not do so at the time as we took him at his word which was obviously not the truth.

I sincerely hope that the above information enables the Local Review Body to uphold the earlier decision by North Ayrshire's Planning Department of refusing planning permission and that this appeal is also refused.

Regards

[REDACTED]



North Ayrshire Council
Democratic Services
Committee Services
Cunninghame House
Irvine
KA12 8EE

25 June 2019

Dear Sir

Notice of Review

Planning Application 19/00135/PP: Westbourne Caravan Park, Isle of Cumbrae

I refer to the Notice of Review submitted in respect of the above application and would submit the following comments:

1. I would refer you to my letter of objection (copy attached) and the many other lodged objections by letter and comment submitted by the community in respect of the original application which I would request be re-submitted in respect of the current Review. (It should be noted that no new letters of support have been provided by the applicant and that those included with the Supporting Report are those submitted at the time of the original application).
2. This is the third attempt by the applicant to gain planning consent to develop agricultural land at this location. On each occasion that an application was to be made the applicant entered into discussions with the Planning Authority and each time it was confirmed to the applicant that the application was likely to be refused on valid planning grounds. Despite this, and the resulting two failed applications, the applicant continues to pursue the development of this land whilst disregarding the planning policies and the Local Development Plan etc. which have been put in place by the statutory powers to protect sites that are of great importance for the wider benefit of the community rather than the business interests/profit motive of the individual.
3. It appears nothing has changed and no relevant fresh evidence has been submitted in the Supporting Report since the above application was considered and refused for the reasons stated and detailed in the Report of Handling – namely that the proposal did not/does not meet the planning policy or the criteria as stipulated in the statutory Local Development Plan and that any limited economic gain would not outweigh the negative effects of the proposed development.
4. There are certain inaccuracies and misleading statements in the information provided by the applicant in respect of the original application/s and the Supporting Report papers.
5. There are flaws in the Economic Impact Assessment submitted which is basically the same as that submitted for the Seaview caravan site at Seamill.
6. The applicant has claimed precedent as the mainstay of the appeal citing the Seaview Caravan Site extension for this purpose but there are major and fundamental differences between these two cases which will be explained below.

Comments on the applicant's Supporting Report

The applicant states that during his ownership of Westbourne Caravan Site between 2003 and 2016 it comprised 31 static caravans situated around Westbourne House within the walled, landscaped gardens of the house which served to effectively screen the caravans from the road, the shore and when viewed from the sea. Since then planning consent has been granted for the new 40 caravan Firth View Caravan Site subject to suitable landscaping being carried out as determined by the Planning Authority.

This extension comprised a **130% increase in the number of caravans (not 100% as stated in the Supporting Report)** – and an even greater percentage increase in the agricultural land area being taken to be developed as

a caravan site. It is regretted that the landscape and screening works promised for this site by the owner and the Planning Authority to lessen its impact on the important Special Landscape Area within which it sits were never implemented.

The latest application, if consented, would represent an increase of 190% in the number of caravans at this locus over a period of just 3 years – and an even greater area of agricultural land being subject to development. It would also effectively further erode the buffer between the caravan site and the town of Millport and any remaining ground would inevitably be subject of future applications for development (whether by the current owner or a future owner) as per the earlier refused application lodged by the applicant in 2018 to develop the whole site (with an additional 34 caravans) up to the town boundary.

It is to be noted that when this 2018 (Ref 18/00984/PP) application by the applicant to develop the whole site up to the town boundary with a further 34 caravans was refused by the Planning Authority much of the justification within the Report of Handling was the same as for the current refusal for the additional 18 caravan extension. This refusal to grant consent was not appealed by the applicant as presumably it was accepted that the economic gain from the development (which would have been calculated as being almost double the current claimed economic gain) would not outweigh the negative impacts of the development. The economic gain claimed now is presumably approx. half the former amount (due to the reduction in the number of caravans) and yet the scale of the negative impacts of the proposed development in terms of the LDP and associated policy documents remain.

The applicant states that a contract to purchase the ground was entered into in 2018 however it was not until after both Planning Application Ref. 18/00984/PP and Planning Application Ref. 19/00135/PP had been refused that the applicant completed the purchase of the land, including the land up to the town boundary, presumably with the intention of using this ownership to put greater pressure on the Council to grant the current appeal and for future development of the remainder of the site to maximise the profit from this existing agricultural land. (Both of the above applications state that the site was not owned by the applicant.)

The applicant refers to discussions with the Planning Authority. Whilst pre-application discussions can be entered into they do not in any way guarantee the outcome of a formal planning application. No evidence has been provided to support the outcomes of these discussions which are stated as having been held in the Supporting Report.

I certainly do not support the contention that the Planning Authority did not have the necessary skills or knowledge to determine this application in the best interests of the community and in accordance with the planning regulations etc.

A level of support from some of the local businesses based on the potential for the additional turnover they will generate from 18 caravans was expressed at the time the application was submitted however an even greater number of objections to the development were received from the community based on planning policy in place and the requirements of the statutory LDP and associated documents at the same time. It appears that the only community group that wrote in support of the proposal was the Isle of Cumbrae Tourist Association.

The development site and the caravans are, and will be, clearly visible from Bute, from the sea, the road & pavement, the footpath on Portachur Point and the walk along the shoreline and will have as a result have a major negative impact on the landscape and scenic views. These features are, and have been over many years, the reason for many hundreds of thousands of visitors coming to Cumbrae to enjoy the unspoilt countryside and the walking and cycling opportunities it presents. The same features have also served to attract people to come to the island to and to buy houses and become residents of the island over the years.

The existing contours do not obscure the existing site – quite the opposite as explained later. (Photos attached)

The local economy certainly does not solely rely on tourism – far from it. The main basis of the economy depends on the year round resident community and nothing should be done which will deter people from moving to the island, living permanently on the island and investing in flats and houses. A growing resident population would also lead to an increase in revenue for the Council (for the provision of essential local services etc.) through an

increase in Council Tax payments. Owners of second homes and primary homes all now already pay full Council Tax.

The Economic Impact Assessment

This Assessment is based on figures produced in a report published by the SCCF which consists of the British Holiday & Home Parks Association (BH&HPA), The Caravan Club, The Camping & Caravanning Club, the National Caravan Council Ltd (NCC), Thistle Holiday Parks and VisitScotland. Its purpose is to provide a collective voice for the whole of the holiday park sector in Scotland. and cannot therefore be deemed totally independent.

The Assessment contains a lot of statements which are identified as anecdotal.

The estimate of the number of days of occupancy of every caravan at 99 days (12 full weeks) per year is very optimistic and the source of this assumption is not clear.

The estimate of the job creation is very high for 18 caravans in use for 99 days per year in the island setting and particularly when evidenced by the minimal impact on job creation on the island of the existing 40 caravan extension.

The estimated daily spend presented is also high. It is recognised that there will be expenditure on the mainland and on ferry fares etc. however this brings little or no direct benefit to the island and it is the island that will be impacted upon by the development, not the mainland. Therefore special account should be taken of the island situation in calculating the daily spend and job creation estimates and impacts.

The daily spend figures in the SCCF Report that were used are as follows however they are overstated in many cases for the Cumbrae situation and should be adjusted. Based on a quick analysis of the figures in the report the following adjustments could be readily made which represents a large reduction in the estimated economic benefit presented.

Table 4.4: Visitor spend per day

<u>Area of expenditure</u>	<u>Owners</u>
<i>Accommodation costs (includes pitch fees and loan repayment)</i>	<i>£23.78</i>
Transport to destination (including petrol)	£9.83
Eating out/drinking out in the area	£12.32
other shopping (e.g. gifts, clothes, souvenirs etc)	£10.82 – v. high daily rate - take @ £5
<i>Eating in/drinking in holiday accommodation</i>	<i>£10.27</i>
Visitor attractions (e.g. heritage sites, gardens, museums)	£4.11 – v. few charges in Millport
<i>Eating in/drinking on the Park</i>	£7.04 – none exists
Outdoor recreation off-site (e.g. cycling, golf, tennis)	£3.07
<i>Outdoor recreation on-site (e.g. cycling, golf, tennis)</i>	£1.60 – none exists
Entertainment in the area	£2.96
<i>Entertainment on the park</i>	£2.00 – none exists
Other	£1.87
<i>Total – on site</i>	<i>£44.70 – Revised estimate £34.05</i>
Total – off site	£44.98 – Revised estimate £35.05
Total – both on and off site	£89.68 – Revised total £79.10

Another factor which impacts negatively on the economic impact of the development is that no contribution to Council Tax is made by the owners of caravans and there is therefore no corresponding contribution to the upkeep of the island's infrastructure or services. This is not a criticism of the caravan owners but it is a fact resulting from current policy. Factors such as these must be taken into account when considering any economic impact on the island of further caravan site developments.

Further, the Westbourne Caravan Site, as far as can be ascertained, does not pay any rates to NAC. This is also the case for most of the shops and businesses on the island (the hotel/pubs being the main exception in that

they do pay rates) and therefore once again the additional negative pressures and costs on the island's infrastructure/provision of services brought about by increasing the numbers of people staying in owned caravans should be reflected in the economic assessment. Again this is not a criticism of the owners of these businesses but it is a relevant fact that should be taken into account.

It is recognised in the application that the caravans will remain empty for 2/3rds of each year and surely everything should be done to encourage greater numbers of full-time residents in houses and flats which will bring a much greater gain to the island.

It is perhaps slightly arrogant of the applicant to suggest that North Ayrshire Council should put his interest in developing this further area of agricultural land ahead of "lesser important criteria" - such as the statutory LDP and associated policy documents etc. - in determining this application.

The applicant refers to the reduced scale of the proposal and refers to the cumulative capacity being less than that of the Kirkton Caravan site. The relevance of this comment is difficult to work out as there are no proposals to extend Kirkton known of at present. By the same token **the Westbourne Site has already increased by 130% in numbers/size in the last 3 years and it is proposed that the capacity be increased by 190% (i.e. 3 times the original size of development) within the same 3 year period.** This represents over development and development of inappropriate scale and location particularly for a small island such as Cumbrae.

As the issue of cumulative impact has been raised it is worth pointing out to the Local Review Body that Cumbrae already has more static caravans on the island than Arran and Bute put together and it appears more than any other island on the west coast of Scotland.

Whilst it is difficult to obtain accurate figures it appears that the table below shows, for comparison purposes, the relative size/population/no. of static caravans on other islands:

Location	Land Area (km ²)	Population	Static Caravans in Parks
Cumbrae	11	1400	Approx. 265
Bute	122	6500	< 100
Arran	432	4600	Approx. 150
Skye	1656	10000	< 100 ?
Islay	619	3228	< 100 ?
Mull	875	2990	< 100 ?

Cumbrae for its size and population already has a totally disproportionate number of caravans and if occupancy is taken at 4 per caravan this represents an almost doubling of the population of the island during potentially 10 months of the year living in temporary, moveable holiday caravans.

The applicant recognises the shortcomings of the existing extension to the Westbourne caravan site and claims the subject of the appeal would address some of the failings. However by "utilising the existing contours", which serves to raise the caravans well above road level, it serves to increase the caravans dominance of the landscape and to exaggerate their location through highlighting them against the raised beach cliff/tree lined backdrop. It is also apparent that yet again the proposal is to place the caravans very close to the pavement which destroys the countryside experience for walkers and cyclists as well as drivers.

The applicant cites Seaview Caravan Site extension as a precedent – the ruling there was that the caravans **must be set back 18 metres from the road** – and that is on a flat level site that was formerly a football pitch situated at the edge of a very busy main road - rather than a prominent green agricultural land on a sloping hillside at a key scenic location.

The applicant refers to the prominence of the caravan site as viewed from the sea (and presumably also the road and shore walks etc) being obscured by the fields and mature hedgerows. This is not the case. The hedges are low and sporadic and when walking along the shore path the caravans are in full view and totally dominate the

view of the area (photos attached) particularly as they are sited at increasingly higher levels on the hillside. There is no effective screening of the existing or the proposed development from the road or from the shore.



View of existing caravan site from the mid channel between Bute and Cumbrae.



View of existing caravan site extension from shore at Portachur Point

It would again appear arrogant for the applicant to suggest that North Ayrshire Council and its associated partner organisations put no thought or professional acumen into designating areas on Cumbrae as an SLA. The reasons for this designation are well thought out and explained in various planning and planning related documents – it is a formal designation that cannot be ignored or pushed to the side because it does not suit one person. It is ironic that Cumbrae's success as a tourist destination, and equally importantly as a desirable place to live, over the last 100 years and more has heavily depended on the very features of the island that this designation is so important in protecting and maintaining and which could so easily be destroyed if this development, which quotes increasing tourism as its only rationale, goes ahead.

The issues concerning coalescence and ribbon development have been well covered in the Report of Handling.

The relevance of referring to permanent detached dwelling houses being developed in West Bay within the town boundary and equating it to the development of a site for temporary moveable structures (i.e. caravans) outwith the town boundary is not clear. Caravans by definition are *"... any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer) and any motor vehicle so designed or adapted"* which is clearly very different from a permanent dwelling house built within the defined urban area as is recognised in the relevant legislation for each type of development.

There is reference in the Supporting Report to *"bringing further visitors to the island making use of the leisure facilities available to their benefit and long term sustainability"* – this fully reinforces the reasons why this development **should not** be allowed to proceed – the natural assets and beauty of the island are, and have been for generations, the major leisure facility that has attracted residents and visitors to the island. Any continuing diminution of this will have a severely negative effect the future of the island.

The Supporting Report states *"There is a suggestion that consent to this proposal would make it difficult to resist pressure on the remaining land, I would contend that the planning authority have the ability to resist such pressure and my client is clear that they have no intention of seeking a further consent at a later date if this appeal is upheld."* It is interesting to note that the client made the same statement when he lodged the application for the first 40 caravan extension to the Westbourne Caravan Site. The Council, as the statutory planning authority is I am sure more than capable of resisting such applications, and indeed multiple applications, and this could be readily confirmed by resisting the pressure being put on it to approve this application.

Precedent

It appears that there is confusion in the minds of the consultants and the applicant about whether or not precedent should be applied.

The applicant promotes the Seaview case as a precedent for why the decision on this site should be made in his favour. It is interesting to note that the same consultants were employed in each case and that the following statement was made in justification of the Seaview appeal:

"In terms of the 'setting of precedent' it is unreasonable for the Council to cite 'precedence' as a reason for refusal. The proposal, this or any other on any site should be judged on its own planning merits in the light of the development plan and other material considerations."

Therefore it appears that the applicant claims that precedent **can** be used to promote the overturning of a refusal decision but **not** to justify a refusal decision being made in the first place

In response to claims by the applicant that precedent had been set by other developments being granted consent in the vicinity of the Seaview site it was stated by in the planners report to the Committee that:

"Planning permission has been approved for development in the immediate locality but there is no precedent in Planning with each planning application considered on its own merits."

It was also emphasised in the Seaview case that the much larger housing developments and further development of the Waterside Hotel would serve to diminish the impact of the caravan site extension on the area. No such additional large-scale developments exist at the Westbourne location to detract from the over development of

the caravan site. The Council stated in its report that the Seaview Caravan Site was modest in size – when compared to other developments in the immediate area. No such “other developments” exist at this location on Cumbrae to detract from the large-scale caravan site proposal.

Seaview was deemed a modest development by the Council when taken in the context of the adjacent large-scale developments of housing/hotel/conference centre/car parking etc.

The existing capacity of Seaview prior to the extension application was 23 caravans. The extension site, which is situated on an unused and abandoned football pitch on flat and undistinguished shoreline adjacent to a very busy main road, was for only 29 caravans. This represented an increase to a total of only 52 caravans.

Dealing on a like for like basis (which one has to if considering whether precedent can be applied) Westbourne Caravan Site started with 31 caravans and extended by 40 caravans within the last 2 years. Therefore an increase to a total of 71 caravans has already taken place – far more than the site total for Seaview – and that is before the current application is taken into account.

If the **current appeal in respect of a further additional 18 caravans is granted** at Westbourne the increase will be from an original 31 caravans to a total of 89 caravans within 2 – 3 years (190% increase in numbers) - way beyond what was approved on appeal at Seaview and without any of the other mitigating circumstances of adjacent large scale developments to detract from the scale of the caravan site or which would serve to lessen its dominance of the landscape – which in itself is much more scenic and of far greater landscape importance on Cumbrae than the flat shore side on the edge of a busy main road at Seaview.

Despite the major differences between the two cases as detailed above, which serve to negate any claims for consideration of precedent in this case, on the basis of the statements made by the Westbourne consultant when advising the Seaview applicant, and on the basis of the Planning statement on precedent provided to the NAC Committee when considering the Seaview case (both of which are quoted above) it would appear that the arguments presented for consideration of precedent are not competent.

Conclusion

To dismiss the only income generation and economic activity taking place in Millport as coming from tourism alone is totally misleading. Due to the vastly improved ferry services many people working at various locations on the mainland now choose to live in Millport and travel on a daily basis. Largs and other North Ayrshire towns are within easy reach and Glasgow can be reached in slightly over one hour door to door. These residents bring their income to the island and boost the economic activity and, unlike many tourism related jobs which are often part time, seasonable and minimum wage based, many of these jobs are at higher paid levels.

More needs to be done to attract residents of all ages to live in Millport but building large scale caravan sites for occasional visitors (estimated at a maximum of 99 days per year by the applicant) in the most prominent areas of natural beauty which are the island’s main attraction will not serve to increase the economy of the island and will deter full time residents from moving to the island.

There is no site-specific justification for developing this site.

At the time the application was made it was not owned by the applicant.

It was previously pointed out in the letters of objection and the Report of Handling that there are other sites on the island which would be more suitable for this type of development and which may well assist other struggling businesses on the island.

It would be foolish to take the best that the island has to offer for the many for the sake of the gain of very few.

Yours faithfully



Planning application 19/00/135/PP – extension of caravan site's extension.

Dear Sir.

I should like you to note my continuing objection to the above planning application. My comments made to the original application stand, and I feel the Planning Officer has handled the previous two applications from the developer in a correct manner which appears to fully comply with the planning regulations currently applicable to this area.

I note the applicants' economic assessment. This is copied from one issued by a caravan site owners association and is mostly incorrect here. The full original document shows that the guestimated daily spend, quoted by the developer, includes spend on on-site facilities such as restaurants, bars and play areas. There are none in this case. It also includes spend by touring caravans and motorhomes – including fuel. There are no sites proposed for this type of caravaner and even if there were there is no petrol station on the island and the ferry profits go to an offshore based company, they don't even come to Britain let alone Cumbrae. For the last 2 weekends every single layby on the west side of the island has had a motorhome, a touring caravan, or a tent parked in it.

The assessment mentions a "fragile island economy". Many of the business's are dependent upon tourism but a lot of them make sufficient money in summer to enable them to totally close for the majority of the year. Many of them also have great difficulty finding staff in summer; everyone on the island that wants a job has one (or two, or three). Every winter we are treated, on a Wednesday morning, to the site of a coach full of tourists chugging around the island. They only stay for one and a half hours as there is no-one open to sell them a cup of coffee – apart from a machine in a local newsagent.

It is only some business's that are dependant on tourists, the majority of the community are not – and they have to contend with all the summer difficulties in parking and travelling to and from the mainland. They also keep the winter shops in business.

For further details please see my original letter of objection.

Since RET we regularly have 2-3 hours wait for the ferry, both to and from the island. This makes many visitors choose not to come and if they do there is nowhere to park.

There are currently 248 static caravan stances on the island, 1 for every 4.8 members of the population. This is more stances, and far more per head, than any other island in the West of Scotland. Firth View is also the most poorly shielded site in the Clyde. Each of the 3 main sites has vacancies.

I have difficulty making the jump between a caravan site at Seamill – the only caravan site at Seamill, with fewer than 25 stances expanding and a 70 strong site on an already heavily subscribed island expanding – no matter how you try and lose it in percentages.

I also have difficulty in relating how anecdotal "evidence" about what will and will not be allowed from over a decade ago (as far back as the 1960's) relates to the planning regulations and intentions today.

It is claimed that the land involved is "poorly drained, poor quality grazing land". If the developer had taken the trouble to dig the assessment trenches required by WoSAS in his first extension, he would be aware that it is highly fertile maerl mixed with rich topsoil. It is well drained. The road adjacent to it has been susceptible to flooding since the Scottish Water new sewage pipe was put in, but the land simply is well drained. As the developer has now purchased the land it will almost certainly be poorly maintained, but it is of high quality.

The views as photographed are interesting and obviously taken by a very short person. The totally unshielded site is visible from Arran. Pointing out there are worse areas does not make it right.

The only holiday accommodation that is in short supply on the island is hotel accommodation – and the Westbourne used to be a hotel. On the vast majority of weekends/weeks there is vacant self catering accommodation available on the island (ranging from caravans to flats, to houses).

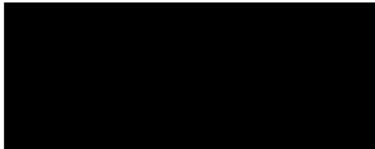
I would hope that the Review Board will pay cognisance to the diligence of their well-trained, qualified, Planning Officer and uphold his decision.

Yours sincerely,



TO
Chief Planning Officer
Irvine

From



Re Further Appeal for Provisional Planning Permission for Extension of Caravan Site at Westbourne Caravan Park Millport.

Dear Sir ,

During the four day Easter break the Isle of Cumbrae welcomed 28,000 visitors. Why? Most probably to enjoy the peace , scenic beauty and idyllic coastline views coupled with the joys of walking and cycling for all age groups. Certainly not to look at an extended caravan site which is determined to dominate completely the lovely and scenic south west exposure of our island.

I have read and studied the current application for a further 18 units and have been amazed at the assumptions and inaccuracies that have been made.

The photographs give a completely distorted view of the area with the use of wide angled lenses and selection of photographic positions which indicate the caravans will hardly be noticeable.

To get a fair picture of the proposed site one has only to walk past the boundary of west bay road and approach and pass it to appreciate just how much the beauty of the area will be affected.

Determination for their appeal to succeed is demonstrated by the length and depth of their financial probing and conclusions.

As the late George Bernard Shaw wrote, "There are lies, damned lies and statistics " , and this seems to apply to the so called benefits which the island would enjoy if this application were successful.

Approximately 20 years or so ago when the houses in Cardiff Street had deteriorated into a very poor condition, the insides were renovated whilst the external aspects were carefully restored to preserve the character of the building. Possibly this was more expensive than demolishing and replacing with modern buildings but how wise it was of the planners to retain the Victorian style and charm of the town. I am sure that lovers of tis island will unite and with one voice give a decisive refusal to this project to increase an already unwanted and ugly caravan site at a much admired side of the island.

In conclusion, if the application succeeds this will be to the great financial advantage of one particular party , if it fails, it will be to the advantage of the residents , visitors and environmental beauty of the Isle of Cumbrae.

Yours Faithfully





Dear Sir,

Planning Application: 19/00135/PP: Westbourne Caravan Park, West Bay Road, Millport, Isle of Cumbrae – Notice of Review

With reference to the above, I wish to register my continued objections to the above extension as stated in my letter of 20th March 2019. I feel that the planning department set out a measured and well-argued case for refusal of the original application for the reduced extension and hope that the committee will uphold the planning officer's original decision.

I would like to further comment on just some of the grounds for appeal:

- The adjacent field to the south west of the park is in fact highly fertile soil being on the raised beach which in this area is composed of broken maerl (calcified red algae which used to grow abundantly around the Tan Spit). Drainage of the field is good but the drains taking the water under the road to the seaward side were smashed when the new sewage pipe was laid and with subsequent resurfacing of the road.
- Rough grazing may to some be considered untidy but it can also provide useful habitat for wildlife. No in-depth survey of the biodiversity in this area has been undertaken but not far to the north of the proposed site, plans to site the sewage work there had to be abandoned as this was an area where the 'Cumbrae mouse', a distinct sub-species, had been recorded.
- 'The revised scheme....retains a large undeveloped area between the caravan park and the nearest housing'. This is not the case and there is genuine concern that should permission be given for this caravan extension that pressure would then be placed to allowed the development of this small area which will no longer be able to be classified as usable agricultural land. Assurances to the contrary from the Westbourne owners tend to have a somewhat hollow ring to them given that they gave assurances that the first development would be the ONLY one.
- It is true that there are many unsightly developments in the Clyde Sea Area. The North Ayrshire coast has been intensively developed; the views on the east side of Cumbrae tend to be of urbanisation and industrialisation on a large scale. This makes it all the more important in terms of the island to preserve the natural beauty on the west side of the island. The Firth View Caravan Park is highly visible from the Main Channel and from Bute, perhaps even further. The reason that this point was made in previous objections was because this may deter yachts, pleasure craft from coming to land on Cumbrae.
- I would argue that the designation of Special Landscape Area is not a blanket cover over the whole island (the point made above is relevant to this). Everyone travelling on the west side of the island appreciates the vistas presented to them of Little Cumbrae, Bute, and Arran. The views from the southwest corner are particularly stunning.
- In terms of the economic impact assessment presented, I would argue that it is both biased and highly optimistic.

- I would argue that the development at Seamill does not provide a strong enough precedent to overturn the application on Cumbrae as the two sites are not even vaguely similar in size or location. Both have views over the Clyde Sea Area towards Arran but there the comparison ends.

I still do not believe that a strong enough case has been made for the need for extra caravan provision at this site. Cumbrae is a small island but already we have a much higher number of caravans than on either of the other two main Clyde islands. They now dominate the south west corner of the island.

I sincerely hope that, on consideration, you uphold the decision of your officer.

Yours faithfully,



From: [REDACTED]

Sent: 28 June 2019 20:17

To: Euan Gray (Committee Services Officer / C'tee & Member Services) <euangray@north-ayrshire.gov.uk>

Subject: Planning application 19/00135/PP: westbourne caravan park, millport

Further to my previous objections, regarding the above planning application I would like to strongly object to any further extension to this site. In addition to the previously stated reasons,

I am also sorely disappointed in the conduct of the site owner who as good as named all the local residents who objected to this extension on social media site Face Book. This has made us feel quite threatened, when we were only exercising our right of free speech and protecting the environment immediate to our house and young children. Some of the older residents of west bay are really upset about being 'named and shamed' for speaking their mind. Unfortunately with our geography the site owners alluding to 'those bungalows and big houses on west bay' who objected means that everyone local knows exactly who objected. I attach screenshots of Face book conversations between the site owner.

I hope you make the right decision not just for the residents of West Bay, but for Millport, the Isle of Cumbrae and all the tens of thousands of visitors who come to experience our lovely green island.

Best regards

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



What a terrible decision and one supported by people who are meant to be doing all they can to improve our island. They should hang their head in shame.

5 d Like Reply



Ridiculous decision, the island needs as many tourists as it can get. Won't affect parking as you have a parking space at your van.

6 d Like Reply



I love to ask NAC to publish the names of the people who objected.

5 d Like Reply



[View 9 previous replies](#)

just...

Nimbys



6 d Like Reply

indeed!

Just nonsense



Write a comment...





Ridiculous decision! There seems to be a certain group who control the island. Shame on them! Will they be happy if it becomes a bird sanctuary?

5 d Like Reply



Ridiculous decision! There seems to be a certain group who control the island. Shame on them! Will they be happy if it becomes a bird sanctuary?

5 d Like Reply

That's a terrible decision. After such a successful first phase, on what is a lovely, well run site, it's disappointing to see it hasn't got the go ahead. Good luck with the appeal!

5 d Like Reply



I would have thought cumbrae needed much more accommodation to attract tourist, seems like a big fuss over what in reality is a quiet site round the side of the island in an area that remains quiet and peaceful as it is and a few more caravans won't affect that. Ridiculous decision

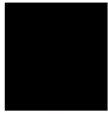


Write a comment...





Replies



I love to ask NAC to publish the names of the people who objected.

5 d Like Reply



You should ask



5 d Like Reply



well they publish details of objections to other projects like building control so why not this??

5 d Like Reply



we have all the addresses. One in Largs one up Golf Road. Mostly just the bungalows around the corner from us. Including a couple of houses.

5 d Like Reply



Thought as much Classic nimbyism.

5 d Like Reply



Write a reply...





Replies

Like Reply

Thought as much Classic
nimbyism.

5 d Like Reply



There were 29,000 visitors over the
four day Bank Holiday. Are 18 new
Caravans really going to have an
impact on the ferry queue ? This was
one of their main worries 😂

5 d Like Reply



CCC's lack of support
is staggering. It speaks volumes that
they towed the line of sitting on the
fence.

5 d Like Reply



You can see all the letters of
objection and support on the NAC
website, however confidential details
such as names and addresses have
been blackened out. One in particular
made me laugh about how the
businesses who were supporting the
venture had vested interests, and
how most of these businesses didn't



Write a reply...





Replies

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5 d Like Reply



They have upset a lot of our Caravan owners with their mean and nasty comments to planning about littering and noise. They are tourism snobs, as long as it has a hull, sail and anchor !!!

5 d Like Reply



one in Largs??? 🤣🤣🤣

5 d Like Reply

just to add, I may not live on the island anymore but



Write a reply...





Replies

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5 d Like Reply



one in Largs??? 😂😂😂

5 d Like Reply

just to add, I may not live on the island anymore but still have the island in my heart. As a holiday maker/tourist I am happy to write letters to support this if it goes to appeal.

5 d Like Reply



Write a reply...



[REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

**APPEAL AGAINST REFUSAL OF PLANNING APPLICATION 19/00135/PP
 EXTENSION TO EXISTING CARAVAN PARK TO PROVIDE A FURTHER 18 STANCES TOGETHER
 WITH ALTERATIONS TO THE INTERNAL DRIVEWAY, POSITION OF BIN STORES AND VISITOR
 PARKING,
 WESTBOURNE CARAVAN PARK, WEST BAY ROAD, MILLPORT, ISLE OF CUMBRAE KA28 0HA.**

SUPPLIMENTARY INFORMATION IN RESPONSE TO COMMENTS.

As a result of the appeal a number of comments/further representations have been submitted on behalf of interested parties.

This report is in response to these comments.

It is noted that a number of the letters are of a similar nature and content and it is not intended that this response will deal with each letter and point individually but respond to the main, salient and factual issues.

It is probable that the great majority of the letters are from residents adjacent to the application site and have therefore a particular desire to see the application refused. Given the population of Millport, the actual number of letters of opposition are a tiny proportion of the residents and a similar number of letters of support have been received.

Turning to the main points raised;

1. Overprovision and still unsold.

The contention is that there is an overprovision of caravans on the island and that my client, having not sold all on the site, does not require further expansion.

Turning first to overprovision, objectors have provided statistics of caravan numbers in comparison with population figures across various islands on the west coast. I do not intend to contest these figures but would provide explanation of the breakdown.

None of the other islands noted has the accessibility that the Isle of Cumbrae has which makes it an attractive island on which to locate a caravan. None of the other islands has such a frequent and short ferry service or is as accessible from the main population centres in Scotland and beyond.

It might be of more relevance to consider the number of caravans across adjacent local authorities, Argyll and Bute and South Ayrshire Councils, and compare these with North Ayrshire and in both cases I would contend that the ratio of caravans to head of population will exceed that of North Ayrshire, the numbers are a result of simple supply and demand.

In respect of the contention that not all caravans are sold and therefore no need for more I would confirm that as of the date of this response my client has only 3 spaces left on the entire site and has expressions of interest on these with prospective owners visiting over the course of the coming weeks which may result in the site being completely occupied.

When my client obtained consent for the previous expansion they did not anticipate that it would be as popular as it is and had considered that it would take a minimum of 5 years to reach full occupancy, it has taken 3 years. On the basis of this demand, and to provide for future interest, my client is seeking consent to extend the site and is willing to limit this to the area under this appeal.

It is interesting to note that when the original application to extend the site was submitted there was support from the residents of West Bay on the basis that they thought that the expansion of the caravan park would help prevent consent for the proposed holiday village that was being promoted for the land immediately opposite them.

Additionally, prior to the development of housing plots at Golf Road, the then owners of this site were approached by a number of residents on the island seeking building plots along this stretch of West Bay, obviously they would have been happy to see this area developed to suit their own aspirations.

In addition, the suggestion that additional caravans will impact the sale of property on the island is neither accurate nor a material consideration.

There are continuously a number of flats/properties for sale on the island and many are cheaper than a new caravan. From information provided by caravan purchasers the reason why they choose a caravan rather than “bricks and mortar” are that many of the flats are of poor quality, in a poor state of repair, have high maintenance costs, have communal gardens which require to be maintained and share significant maintenance costs for common repairs, to name but a few of the issues. Indeed a lot of flats in Millport have been handed down through families and are left unoccupied for very long periods, almost abandoned, leading to the situation that the properties become semi-derelict impacting on the other flats within the building. By purchasing a caravan the owners get the benefit of a modern, well equipped caravan on a site which is well maintained on their behalf as part of their purchase agreement. I would expect that everyone on the site would confirm their pleasure with the provisions, setting and maintenance of the site where landscaping is well maintained, there are no unsightly toilet blocks, gas bottles or bins.

Another suggestion is that additional caravans will increase pressure on the ferries and that there are regular 2/3 hour waiting times for ferries to and from Cumbrae. As someone who travels to and from the island on a weekly basis I would say that lengthy queues are infrequent and coincide with the main tourist events on the island, the Country Music Festival, September Weekend and possibly some holiday weekends when the weather is good, otherwise it is unlikely that one has to wait on a second ferry.

Finally, in this respect, comment has been made that caravan owners pay no council tax. This is something which is not relevant and it should be noted that neither do flats which are used for holiday lets, Airbnb etc, which comprise a large number of flats on the island.

2. Precedence.

In the appeal submission the site at Seamill was illustrated as a precedent. Much has been made that the sites are not comparable nor should precedence be used in support of any application/appeal.

This application was used to highlight the variance in handling of the applications which both had similar characteristics and issues. The different planning officers who handled each application took differing views as to the application of the various Local Plan conditions in reaching their conclusions, one recommending approval after previous refusals and the other refusal.

Whilst the objectors use statistics when it suits their arguments they are also selective in their use. For the record the increase in size of Seaview equates to an increase of 225% with the cumulative increase at Westbourne being a lower proportion.

It is entirely reasonable to use precedence as a means of supporting an appeal when that precedent has been set by the same local authority.

3. Economic analysis.

It is accepted that in the report there are sums of money which are allocated for expenditure on the caravan site which in this case would not happen as some of the facilities are not provided on site. The lack of these facilities has already been explained in that it encourages caravan owners to make use of the facilities in Millport to the benefit of the local economy. Rather than remove these sums entirely from the financial equation it would be more appropriate to re-allocate these expenses to the same provisions being part of the local business in Millport, thus further adding to their income.

The business owners on the island are best placed to comment on the benefit they gain from the caravan park and a significant number of them have written in support.

The fact that local residents work on the mainland and spend some of their earnings on the island is not a direct comparison with the creation of jobs and expenditure on the island. Indeed it is disingenuous of the objectors to suggest that they greatly benefit the local economy when the vast majority of island residents do their main shopping either in the supermarkets in Largs, Greenock or further afield near their place of work.

Having myself been a regular visitor to Millport since the 1950s and a part time resident on the island for the past 15 years I have witnessed the number of shops and businesses that have ceased to trade over the years. Even at the time of this appeal there are a number of businesses which are for sale or closed down on the island. The tourist trade is the livelihood of many of the local businesses and as such developments, which increase tourism, can only help keep them trading.

A repeated comment is that an extension to the caravan park would adversely impact on marine (yachting) tourism either travelling between Cumbrae and Bute or landing in Millport.

Firstly yachts-people coming ashore at Millport do so on foot and are extremely unlikely to venture beyond the local shops, pubs etc. and therefore an extension to the caravan park would have no impact on them and their enjoyment of the island.

Secondly, it beggars belief, the suggestion that an extension to the caravan park would make the sailing community boycott the channel between the islands. I would suggest that the large number of mobile homes and rough camping that takes place along the full west side of the island at every layby and flat area of shore has a more detrimental impact on the island's appearance and leads to more litter and deterioration of the shoreline than well laid out, landscaped caravan site extension.

4. Special Landscape Area of Greater Cumbrae.

It is accepted that the field is part of the Special Landscape Area of Greater Cumbrae but it is first of all a field, formerly owned by Messrs McIntyre who farm on the island.

Again, in this context, it has been suggested that it is valuable agricultural land of good quality. If this were the case I am sure that the previous owners would have cultivated the land to maximise its value to the farm. At no time in living memory, that I am aware of, has this land been cultivated providing only rough grazing for cattle unlike the fields opposite, on the shore side, which are annually cultivated. It would be unlike the farming community not to make the most of their land if it was suitable. Indeed had the land been cultivated, as would be accepted, there then would be no habitat for any of the suggested wildlife including the 'Cumbrae mouse'.

There has also been a comment made that the applicant has allowed the field to be used for wild camping leading to fires. For the record the applicant has never given permission for use of the field for camping and indeed it was the applicant who notified both the Police and Fire Services in respect of the fires, a fact that can be corroborated by any of these authorities.

5. Additional Support and/or Objection.

The objectors note that there are no new letters in support of the application and this is accepted, however there are equally no new letters of objection. At the same time there have been a number of comments noted on 'social media' and these have all been supportive.

Whilst only one Community Group has provided written support for this application none have objected and no one on the island, beyond the immediate residents in West Bay, as far as I am aware, has submitted an objection.