Application Ref: NP/14/0637

Case Officer	Andrew Richards
Applicant	Mr W Staniland
Agent	
Proposal	Diversification of Brumwells Garden Machinery with the provision of 12 sustainable wigwam lodges with car parking on adjacent land. Link the existing dwelling of Badgers Holt as a live-work dwelling for the two businesses.
Site Location	Brumwell Garden Machinery, Badgers Holt, Jameston, Tenby, Pembrokeshire, SA70 8QB
Grid Ref	SS05589920
Date Valid	20-Nov-2014 **Target Date** 14-Jan-2015

Following initial consideration of this application at its meeting of 21 January 2015, the committee decided to undertake a site visit and also requested additional information.

Background to the policy on Camping, Touring Caravans, Statics and Chalet sites.

The currently adopted local plan policy provides a clear explanation for the strategy. Extract from the local plan reads:

Visitor Accommodation, Attractions, Leisure Activities and Recreation

4.152 The strategy for visitors is to attract an optimal number, origin, type, duration of stay and spend of visitors all year round while ensuring that National Park environment continues to hold its attraction as a landscape of national and international importance. This is best achieved in land use terms by not adding substantively to the overall provision of visitor accommodation, as this could encourage further 'peaking' and cause damage to the National Park landscape and special qualities, both in terms of the impacts of the additional development and increased activity in some 'hot spot' locations.

4.153 Instead, the future for the National Park in this Local Development Plan is one where by the end of the Plan period a range of quality holiday accommodation, similar to the level and distribution of provision at the beginning of the Local Development Plan period, is retained to suit a range of pockets. Within the Local Development Plan's Centres upgrading is allowed so that more accommodation can be made suitable for the off peak season and the quality of the offer for the visitor is also improved. Hotels and guesthouses that can provide accommodation and employment all year round are safeguarded unless they are no longer viable. Some additional self catering is allowed to cater for all year round needs but this is restricted to instances where there isn't a priority to meet affordable housing needs.

Policy 38 Camping, Touring Caravans, Statics and Chalet Sites

New camping, caravanning, static caravan or chalet sites or the extension of existing sites either by an increase in the number of pitches or enlargement of the approved site area will not be permitted. Exceptionally, static caravan and chalet site areas may be enlarged where this would achieve an overall environmental improvement, both for the site and its setting in the surrounding landscape.

4.167 This policy seeks to control the further provision of caravan, camping and chalet sites.

4.168 The majority of caravan and camping sites in Pembrokeshire are concentrated within the National Park which occupies only 37% of the total land area of the County. The occupancy of pitches on static caravan sites within the National Park is also far greater than those outside the National Park.

Background statistics which support policy stance of limited growth in numbers

Prior to suggesting any policy, especially one which provides a limited growth strategy (but one of improving quality) there was substantial investigation into existing provision. The policy is supported by an evidence paper – the Enjoyment Background paper to the Local Plan.

Tourist Accommodation

Pembrokeshire has 65% (93,966) of the bed spaces within the south west wales region.

Holiday parks (caravan parks) account for the majority of these bed spaces with 66% of the total regional bed spaces, with self-catering 22% and serviced accommodation just over 12%. There has been a growth of about 2% since the previous survey in 1995.

The serviced accommodation sector is made up mainly of independently owned enterprises which are mainly very small (over half have less than 10 rooms).

On average occupancy rates of these bed spaces are low.

Visit Wales: Tourism to South West Wales 2005

Accommodation type	**Trips %**	**Nights %**	**Spend %**
Hotel and guest house	18	17	27
B&B/Farmhouse	5	3	10

Self Catering	12	17	17
Friends/relatives	21	17	13
Camping	11	10	8
Caravan			
Towed	12	23	12
Static	13	11	10
Other	8	2	3

The National Park Authority Caravan Survey of 2002 indicated that The National Park occupies 38% of the land area of Pembrokeshire, but accommodates 56% of caravan sites.

Caravan site pitch occupancy (rather than bed space occupancy) has increased significantly since 2000. Authorised sites for static and/or touring caravans show an overall increased use of 14%. The data is collected by means of aerial photographs and therefore the number of touring caravans is likely to vary greatly depending on when the photographs were taken. The highest recorded increases are touring caravans in the southern areas of the National Park (38% increase). Static caravan sites show much smaller increases in the number of pitches occupied within the National Park – the increase being about 4% overall. This has, however brought the pitch occupancy on static caravan sites in the National Park to over 90%, although approximately 400 pitches remain empty.

The sites within the National Park and coastal areas generally have always been more popular than the sites further inland. To gain a fuller picture the numbers of caravans using sites within the Pembrokeshire County Council planning area were also surveyed. This shows that there are 20% more static caravan pitches and 13% more touring caravan pitches occupied within that area. The largest increases are seen in the southern parts of the County Council area. In the northern area outside the National Park 35% of static pitches and 56% of touring pitches remain unoccupied.

Statistics on occupancy of caravan parks undertaken by Visit Wales in 2005 indicate an increase in the number of visitors using caravan and camping accommodation.

For 2012 the comparable STEAAM figures indicated that similar comparison of touring pitches from May-October showed an average occupancy for Pembrokeshire as 38% and Wales 24%. This would appear to indicate that the touring site occupancy in Pembrokeshire has remained fairly consistent from 2002 to 2012, and that the Wales' figure has dropped off.

Other trends which are fairly anecdotal at present, is the trend towards larger towed caravans – double axle models with significant awnings to increase floorspace. These caravans tend to be being towed onto sites and remain in situ not only for the holiday season, but also are left on their pitches rather than being towed home or stored for the winter off-site.

What is happening in Pembrokeshire County Council planning area?

The evidence provided by PCC for its recently adopted Local Plan paints a similar picture to that provided within PCNPA area. There is a surplus of pitches.

In 2008 the Tourism industry was worth a total of £521.4 million to the Pembrokeshire economy as a whole, employing a total of 16,222 people, 9,576 of those within the tourism accommodation sector. (STEEAM report 2008).

The County of Pembrokeshire has 160 caravan and camp sites in total (excluding Caravan Club sites). Of this total, the majority (82) are entirely within the Pembrokeshire Coast National Park (PCNPA). 74 are entirely within the area under the planning jurisdiction of Pembrokeshire County Council (PCC) and three are in locations split between the two authorities.

The occupancy of static caravans is, as may be expected, highest on sites within the National Park. This is largely due to the popularity of caravan sites in a coastal location and within the National Park. The Pembrokeshire Tourism occupancy survey of static caravan pitches for January – July 2009 across Pembrokeshire, based on small sample sizes, shows an average static pitch occupancy of 48.6% for the months March to July. The highest static pitch occupancy rate was recorded in July 2009, at 72.7% occupied.
This indicates that static caravans are a popular accommodation choice for those visiting or holidaying in Pembrokeshire.

However, there is still surplus capacity in terms of occupancy rates of situated static caravans at present. Moreover, there is capacity under existing consents for a further 365 static caravans (13% of total permitted static caravans) to be added to existing sites.

These figures merely provide a snapshot of change, but on this basis the additional 365 static pitches available under existing consents represent significant surplus capacity during the LDP plan period.

It should emphasised that these statistics only take into account sites which require planning permission and do not include small caravan and camping sites provided by the Caravan and Camping club which enable sites of up to 5 caravan pitches and 10 tent pitches being provided as 'certified sites'. A recent search of the Caravan and Camping Website revealed about 65 certified sites within Pembrokeshire amounting to no fewer than 325 towed caravan pitches and 650 tent pitches.

What about future trends – are our policies able to accommodate these market requirements?

The Roger Tym and Partners 2011 Wales Holiday Parks Economic Impact Assessment commissioned by the The British Holiday & Home Parks Association considered future trends in holiday parks.

Trends were anticipated that there would be a growth in the supply and use of camping pods (wooden tents) and 'glamping'. Another felt that challenges in generating significant revenues from camping pitch fees might see site owners switch from tents to caravans. It was felt that increasing customer expectations would continue to drive changes to parks. For instance, several interviewees felt that were likely to be continued moves away from high density layout of parks;

"Eventually, sites with high densities will move over to radial designs. They will realise when demand drops off that they need to do something."

One or two respondents also thought there would be a demand for larger pitches on sites.

"People want to bring along more stuff- touring caravans are bringing awnings with them. It all requires more space."

Technological advances were also highlighted by some as a possible stimulus for change, with increased use of electric cars possibly leading to the need for electric charging points on sites.

Several respondents felt that rising fuel prices would impact on the touring sector. However, views on the nature of this impact differed. Some felt that levels of touring would reduce overall whilst others thought that numbers would hold up but the distances travelled by those towing caravans would reduce. This, they felt, would have adverse effect on parts of the UK located a long way from origin markets such as Scotland and the South West.

Trends in Pembrokeshire

It would be appear that the applications for planning permission for chalets, lodges and pods is growing, and that this trend away from the traditional tourers and statics is here to stay. Site owners are also requesting the change over from tents to touring pitches, and from touring pitches to static caravan pitches. There is a growth in 'permanency' of the product and the demand for more on-site facilities too eg. hard-standing, electric hook-ups.

Variations on the traditional tent, touring and static caravans are becoming increasingly popular, with yurts, pods, shepherds huts offering a more attractive 'escape to the country'. There is also a move away from the site toilet and wash block as more caravans have their own inbuilt facilities.

Since 2010 there has been a significant number of permissions granted for caravan, camping and chalet type holiday accommodation (see table below). It should be noted that many of these are derived from certificate of lawfulness applications, whereby the applicant is claiming that the development has been there for 10 years and hence is lawful with no reasonable prospect of enforcement action. These developments all add to the surplus of pitches throughout Pembrokeshire.

LPA area	Number of planning permissions granted from 1.4.2010 to 1.1.15 for caravans camping and chalets types of tourism accommodation	Approximate net gain in bed spaces provided
PCC	18	680
PCNPA	20	1260

Evidence would suggest that the caravan and chalet sector of the tourist accommodation industry is very important to Pembrokeshire. That this accommodation sector appears to have been rejuvenated with the advent of the 'stay-cation'. The upgrading of site facilities and the expectation of occupiers will drive the need for site owners to improve their environment quality, their out-of-season offer and their on-site creature comforts. This will result in the need for providers to modify and improve their sites. Existing adopted policies are designed to accommodate this trend and also encourage existing site owners to adapt to these market trends.

With the current surplus of pitches, (and the number of pitches that do not require planning permission being also available), there is clearly current capacity which exceeds current demand. Granting planning permission to new sites, especially in areas where there is already a high volume of pitches (ie south and south-east) will only reinforce over provision, poor return on investment and lead to hot-spots and environmental detriment in certain areas of the Park.

Existing site owners need the confidence that policy will be applied consistently and fairly if they are to be encouraged to put considerable re-investment into the current sites.

At the similar application at St Ishmaels the minutes of the meeting:

'The Head of Development Management reiterated at the meeting that the granting of this application represented a risk to the Authority that the principles of the development plan in respect of the location of new self-catering accommodation in the countryside would be compromised and might set an undesirable precedent for similar applications in the future, the combined effect of which could undermine the strategy of the development plan and cause an adverse effect on the special qualities of the National

Park. Members were therefore requested to provide very clear, evidence based reasons for any approval of this application.'

Definitions

Members requested that they be reminded of definitions of certain planning considerations.

Brownfield Site

Planning Policy Wales (Edition 7) states at its figure 4.3:

Definition of Previously Developed Land

Previously developed land is that which is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated fixed surface infrastructure. The curtilage (see note 1 below) of the development is included, as are defence buildings, and land used for mineral extraction and waste disposal (see note 2 below) where provision for restoration has not been made through development management procedures. Excluded from the definition are: • land and buildings currently in use for agricultural or forestry purposes; • land in built-up areas which has not been developed previously, for example parks, recreation grounds and allotments, even though these areas may contain certain urban features such as paths, pavilions and other buildings; • land where the remains of any structure or activity have blended into the landscape over time so that they can reasonably be considered part of the natural surroundings; • previously developed land the nature conservation value of which could outweigh the re-use of the site; and • previously developed land subsequently put to an amenity use.

Notes:
1. The curtilage is defined as the area of land attached to a building. All of the land within the curtilage of the site will also be defined as previously-developed. However this does not mean that the whole area of the curtilage should therefore be redeveloped. For example, where the footprint of a building only occupies a proportion of a site of which the remainder is open land (such as a hospital) the whole site should not normally be developed to the boundary of the curtilage. The local planning authority should make a judgement about site layout in this context, bearing in mind other planning considerations such as policies for the protection of open space, playing fields or development in the countryside. They should consider such factors as how the site relates to the surrounding area and requirements for on-site open space, buffer strips and landscaped areas. 2. This relates to minerals and waste sites which would otherwise remain unrestored after use because the planning permission allowing them did not include a restoration condition. All other such sites will be restored to greenfield status, by virtue of the planning condition.

Curtilage

Curtilage is a legal definition and should not be confused with land-ownership although often the two will be identical.

In law, the **curtilage** of a house or dwelling is the land immediately surrounding it, including any closely associated buildings and structures, but excluding any associated "open fields beyond", and also excluding any closely associated buildings, structures, or divisions that contain the separate intimate activities of its own respective occupants with those occupying residents being persons other than those residents of the house or dwelling of which the building is associated. It delineates the boundary within which a home owner can have a reasonable expectation of privacy and where "intimate home activities" take place. It is an important legal concept in certain jurisdictions for the understanding of search and seizure, conveyancing of real property, burglary, trespass, and land use planning.

In urban properties, the location of the curtilage may be evident from the position of fences, wall and similar; within larger properties it may be a matter of some legal debate as to where the private area ends and the 'open fields' start.

Our tree and landscape officer provided the following summary of an orchard.

An Orchard can be designated as:

- A piece of enclosed land planted with fruit trees
- Intentionally planted trees and/or shrubs that are maintained for fruit and/or nut production
- Usually managed through activities such as grafting and pruning
- Distinguished from other wooded habitats based on the preponderance of domestic fruit and nut species such as:
  - Apple
  - Plum
  - Pear
  - Damson
  - Cherry
  - Walnut
  - Cobnut
- Generally at least 50% of the trees would be domestic fruit or nut species (although this percentage would not be invoked for distinguishing orchards from wood pasture/ parkland)
- An Orchard can also comprise ponds and other wetland features
- Sometimes they are a feature of large gardens where they serve an aesthetic as well as a productive purpose.
- Most temperate-zone orchards are:
  - Laid out in a regular grid, with a grazed or mown grass or bare soil base that makes maintenance and fruit gathering easier

- On a wide range of soil types from slightly acid, relatively infertile soils to fertile river floodplain soils and lime-rich soils.
- Found on slopes ranging from steep to level
- Found on any aspect

Recommendation

The recommendation of refusal as set out in your previous committee report paper (p166 21.1.2015 DM) still stands. The additional information relating to existing number of pitches and the spare capacity which is already identified in this sector of tourism accommodation confirms the need for a policy which focuses the provision of new pitches on existing sites within certain areas as expressed in our adopted policy 38.