

## Item 5 - Report on Planning Applications

**Application Ref: NP/15/0131/FUL**

<b>Case Officer</b>	Caroline Bowen		
<b>Applicant</b>	Mr D Brown		
<b>Agent</b>	Mr G Blain		
<b>Proposal</b>	Change of use of land to winter storage of 35 caravans from 10th January to 28th February in any future year (in retrospect)		
<b>Site Location</b>	Buttyland Touring & Tent Park, Station Road, Manorbier, Pembrokeshire, SA70 7SN		
<b>Grid Ref</b>	SS06859906		
<b>Date Valid</b>	03-Mar-2015	<b>Target Date</b>	27-Apr-2015

**Summary**

Planning permission is sought for the storage of 35 touring caravans at Buttyland Touring and Tent Site during the closed period which runs between the 10th January and 28th February in each calendar year. The application is retrospective, and has been submitted in order to remedy a breach of condition 3 of the planning permission reference NP/464/93, which states that 'There shall be no use of the site for touring caravans or tents during the period 10th January to 28th February in any year'. This application is a re-submission, following the withdrawal of a planning application, made in 2014, for the storage of 50 touring caravans.

Following consultation, the Community Council has recommended refusal of the application, reiterating it's earlier reason for refusal on the previous submission NP/14/0693 on the grounds that the retention of the touring caravans would have an impact on the visual amenity and special (environmental) qualities of the National Park, and that approval of this application would also set a precedent for year round touring caravans that would impact (including on visual amenity) on may other sites in the PCNP area. A letter of concern has been received from a neighbouring, who has raised issues in respect of the breach of the original condition, the impact on the landscape of the National Park, the visual impact on neighbours and on-going unauthorised works.

The application site is a long established caravan and tent site, located in Manorbier Station, and the touring caravans are located to the south and east of the main entrance and reception building. A planning application was submitted in 2014 for the storage of 50 touring caravan, however, this was withdrawn as officers expressed concern that the additional caravans would not be removed from the site once the site re-opened. This proposal seeks consent for the winter storage of 35 caravans, which relates to the same number of caravans allowed on the site at any one time.

The caravans to the south of the site fall within the settlement limits for Manorbier Station, but the caravans extending to the east fall within the countryside. It is clear from aerial photographs dating from 2000, however, that these caravans have historically been located on this part of the site. The

## Item 5 - Report on Planning Applications

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concerns raised by the Community Council and the neighbour have been considered, however, these concerns have to be balanced with the existing site characteristics. The existing touring caravans are already able to stay on site for ten months of the year, and there is no restriction on the length of stay by any one unit. The winter storage would not be considered to have a harmful effect on the existing landscape setting – the appearance of the site as an tourist facility is established; and whilst the storage of caravans in rural areas where there would be a clear visual conflict with an undeveloped landscape setting would not be supported, in this instance, there would be no significant change in the character of the site, where caravans would be stored on exactly the same pitches.

In light of this, the proposal would not be considered harmful to its setting, nor would harm the special qualities of the National Park setting. The application can be supported by officers, and the recommendation is, therefore, of approval, subject to conditions.

### **Consultee Response**

**Natural Resources Wales:** No objection

**PCNPA - Park Direction:** No adverse comments - The majority of the site is contained within an area allocated in the Local Development Plan for housing development (with a possible extension of the school grounds to the south). The assessment of the site for the Local development Plan concludes: The site is generally well related to existing development, and could be developed without significant intrusion into the countryside.

The reason for the condition on the previous application is linked to visual amenity. However, the site has been found to be acceptable for residential development and the visual impact contained within the locality. This does not however, include the line of caravans in the field to the east of the buildings within the site and which extends into the countryside beyond the Centre Boundary defined in the Local Development Plan.

**PCNPA - Ecologist:** No adverse comments.

**Manorbier Community Council:** Recommend Refusal - Full Council reiterated its earlier reasons for recommending refusal (under NP/14/0693)'...in practice, touring caravans (now up to 50 and not 35) never move from the site during the prohibition period and have never moved for a number of years. These caravans are now covered in green covers. As a result, there is an impact on the visual amenity and special (environmental) qualities of the National Park, and is contrary to the aims of policies 8 (criterion c), 15 (criterion a, c, d and e) and 38 of the PCNP Development Plan. The applicant is in breach of the condition notice... ..Approval of this application would also set a precedent for year round touring caravans that would impact (including on visual amenity) on many other sites in the PCNP area ('open the floodgates')

## Item 5 - Report on Planning Applications

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### **Public Response**

A site notice was posted in accordance with statutory requirements, and neighbouring properties notified by letter.

One letter of concern was received from a neighbouring property who, in summary, raised the following issues;

- Although this application is seemingly for a period of just than 2 months the consequences of permitting the application are far greater. What is happening in practice is that the touring caravans never move from the site. They do not tour, thereby, undermining the intended use of the site. Visually their impact adversely affects the National Park all year around and to a much greater extent than is the case with caravans which are touring.
- The visual impact on neighbouring property is unreasonable. Whilst neighbours would know that there is a caravan site there, they would reasonably expect the conditions under which the site should operate to be complied with and if necessary enforced.
- The precedent that would be created for allowing the winter storage of caravans in the National Park should be of sufficient concern to be a reason to refuse this proposal. To allow the application would also give the impression that the Authority does not enforce breach of planning conditions even when the breach has been recognised as being significant enough to serve a notice.

### **Policies considered**

Please note that these policies can be viewed on the Policies page Pembrokehire Coast National Park website - <http://www.pembrokeshirecoast.org.uk/default.asp?PID=549>

LDP Policy 01 - National Park Purposes and Duty  
 LDP Policy 06 - Rural Centres  
 LDP Policy 08 - Special Qualities  
 LDP Policy 15 - Conservation of the Pembrokehire Coast National Park  
 LDP Policy 16 - Open Space and Green Wedge  
 LDP Policy 35 - Visitor Economy  
 LDP Policy 40 - Site Facilities on Tent, Chalet and Caravan Sites  
 LDP Policy 53 - Impacts on traffic  
 PPW7 Chapter 03 - Making and Enforcing Planning Decisions  
 TAN 12 - Design

### **Constraints**

LDP Allocation  
 LDP Mineral Safeguard

## Item 5 - Report on Planning Applications

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LDP Open Space  
 Biodiversity Issue  
 Historic Landscape  
 Potential for surface water flooding  
 LDP Centre:50pc aff housing;30 units/ha  
 Recreation Character Areas

### Officer's Appraisal

#### **Background and site description**

The application site is a long-established caravan site located on the eastern flank of the Station Road running north toward Manorbier Station. The caravan site area straddles the Rural Centre Boundary, with the eastern part of the site falling in open countryside. The area of land, the subject of this application, falls within the existing curtilage of the caravan site.

The site is mainly flat in profile, and is screened from views from the adjacent road by close board fencing. The site comprises a modern bungalow, small clubhouse and a reception building, with the main body of the caravans located on the land to the south of these buildings. To the north, the site is bounded by residential properties, to the west is a garden centre and holiday park and to the south is Manorbier Primary School. To the east are open fields.

It was brought to the attention of the Authority during 2013-2014 that a condition attached to the agricultural planning permission, in relation to the site (Condition 3 of NP/464/93), was not being complied with, in that, caravans were being stored on the land during the winter period. The Authority served a Breach of Condition Notice on 28th February 2014 identifying this breach and requiring the owner to comply with the condition in future.

Discussions have since taken place between officers and the applicant's agent which has resulted in the submission of this application.

#### **Planning History**

- NP/14/0693 – C/U land to winter storage of up to 50 touring caravans from 10/1 to 28/2 in any year. Withdrawn. February 2015.
- NP/14/0442 – Variation of conditions 2 & 3 of NP/464/93 to change 50 tourer/tent pitches to 50 static caravan pitches. Cancelled.
- EC12/0007 – Breach of Condition Notice – Condition 3 of NP/464/93 dated 28th February 2014.
- NP/14/0088 - Laydown area comprising of a grasscrete parking/turning area and provision of a recycling area (in retrospect). Approved.

## Item 5 - Report on Planning Applications

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- NP/13/0260 - Certificate of Lawfulness for touring and camping field for upto 35 touring caravans or tents at any one time on a seasonal basis for holiday purposes only from 1st March up to 28th September in any one year. Appeal allowed.
- NP/09/544 – Buttyland Caravan and Camping Park, Manorbier – Garaging and new reception/booking office for caravan site and conservatory extension to bungalow within caravan park boundary – Approved – 14 February 2010
- NP/09/315 – Buttyland Caravan Park, Manorbier – Signage – Approved - 17 September 2009
- NP/09/170 - Buttyland Caravan Park, Manorbier – Signage – Withdrawn – 19 May 2009
- NP/07/549 – Buttyland Caravan Park, Manorbier – Residential Development (2 dwellings) (Outline) – Refused – 5 December 2007 – Appeal Dismissed – 23 September 2008
- NP/464/93 – Buttyland Tent & Caravan Park, Manorbier – Change of use of Caravan/Tent Park to Provide 35 touring unit pitches and 15 tent pitches – Approved – 6 July 1994
- NP/474/92 – Buttyland Touring Caravan and Tent Park, Manorbier – Change of use of caravan tent park to provide 110 touring unit pitches – Refused – 23 November 1992 – Appeal dismissed 20 April 1993
- NP/46/91 - Buttyland Caravan and Tent Park, Manorbier – Removal of Condition No. 4 of NP/478/90 – Refused – 23 April 1991
- NP/478/90 – Buttyland Caravan and Tent Park, Manorbier – Change of use of caravan/tent park to provide 20 touring caravan pitches and 30 tent pitches – Approved – 7 January 1991
- NP/139/90 – Buttyland Caravan and Tent Park, Manorbier - Application for Established Use Certificate for 100 tents – Refused – May 1990
- NP/629/88 – Buttyland Caravan and Tent Park, Manorbier - Application to increase number of touring caravans to 65 – Refused – December 1989
- PR/1006/T – Buttyland Caravan and Tent Park, Manorbier - Application for 10 touring caravans – Approved – June 1972
- PR/2000 – Buttyland Caravan and Tent Park, Manorbier - Application for 50 tents and 40 touring caravans – Refused – January 1967

## Item 5 - Report on Planning Applications

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### Constraints

- LDP Centre
- LDP Allocation – MA 895: Mixed Residential (15 units)/Education.
- LDP Mineral Safeguard
- LDP Open Space
- Biodiversity
- Historic Landscape
- Potential for Surface Water Flooding
- Recreation Character Area

### Current proposal

Planning permission is sought for the storage of 35 touring caravans at Buttyland Touring and Tent Site during the closed period which runs between the 10th January and 28th February in each calendar year. The application is retrospective, and has been submitted in order to remedy a breach of condition 3 of the planning permission reference NP/464/93, which states that 'There shall be no use of the site for touring caravans or tents during the period 10th January to 28th February in any year'.

### Key issues

- Policy and principle of development
- Amenity and privacy
- Biodiversity
- Other material considerations

#### *Policy and principle of development*

Policy 6(c) states that in Rural Centres, one of the land use priorities is to protect and enhance the Centre's range of facilities.

Policy 8 of the Pembrokeshire Coast National Park Local Development Plan (LDP) is a strategic policy which refers to the special qualities of the National Park and lists priorities to ensure that these special qualities will be protected and enhanced. This policy is supported by supplementary planning guidance on landscape assessment – the application site falls within LCA 4 – Manorbier/Freshwater East, which is identified as a large tract of rolling lowland, with an indented cliff coastline; and punctuated with small villages and farmsteads. The SPG notes that caravan parks have eroded the visual quality in places, particularly on the coastal edge, and recommends that tourism development be integrated better into the landscape, particularly with regard to the rural coastal landscape.

Policy 15 of the LDP seeks the conservation of the Pembrokeshire Coast National Park with criteria 'a' and 'b' resisting development that would cause significant visual intrusion and/or, that would be insensitively and unsympathetically sited within the landscape. It further resists development that would not be compatible with its location (criterion 'c'), fail to harmonise

## Item 5 - Report on Planning Applications

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with, or enhance the landform and landscape character of the National Park (criterion 'd'), and/or fail to incorporate important traditional features (criterion 'e'). In addition Policy 29 requires all development proposals to be well designed in terms of place and local distinctiveness (criterion 'a') and Policy 30 seeks to avoid development that is of an incompatible scale with its surroundings (criterion 'b') or is visually intrusive (criterion 'd').

It is proposed to store 35 touring caravan at the site for the closed period of the site, which runs between the 10th January and 28th February in any one calendar year. The caravans would be placed on the existing gravel pitches within the site, and would be covered with green tarpaulins. The caravans would relate to the existing setting of the caravan park, and would not be considered to be of any greater visual impact than would be experienced whilst the caravan site was in operation. Reservation has been expressed at the position of the caravans to the east of the main site, which fall just outside of the Rural Centre boundary, but, on checking aerial photograph records from 2000, there are caravans located along this belt, and these caravans still fall within the curtilage of the caravan park.

It is noted that the land immediately to the south of the reception building and bungalow is subject of a mixed allocation in the current Local Development Plan for 15 dwellings and education use. The assessment of the site for the Local Development Plan concluded that the site is generally well related to existing development and could be developed without significant intrusion into the countryside.

On balance, the storage of touring caravans over the winter period would not be considered to have significant visual harm, given the existing character of the caravan site setting, and the surrounding development. The storage of the touring caravans is of a level ancillary to the existing use of the site, and would naturally cease when the caravan re-opens. It is considered, therefore, that the proposal would not harm the character of the surrounding landscape, and relates appropriately to an existing caravan park, thereby not causing harm to the special qualities of this part of the National Park.

### *Amenity & Privacy*

In respect of amenity, the proposed winter storage would not be considered inappropriate to, or incompatible with, the existing site. It would not lead to an impact in traffic movements nor – for the reasons given above – would be visually harmful to the particular setting. The caravans would not be occupied over the winter therefore neighbouring amenity and privacy would not be significantly harmed.

The Authority has consulted with the Environmental Health Section of Pembrokeshire County Council and has received no response to this application.

## Item 5 - Report on Planning Applications

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### *Biodiversity*

The application site is within an area where biodiversity is a known constraint. The Authority's Planning ecologist has been consulted and has advised that there are no comments for this application.

### *Other material considerations*

- The concerns raised by the Community Council and neighbours.

Both the Community Council and the neighbour have expressed concern at the breach of the original planning permission, and at other works being carried out at the site which may not have had the benefit of planning permission. This planning application has been submitted in order to remedy the breach of condition, and the application has to be considered on its own merits. In respect of other works on site, officers have been investigating various alleged breaches of planning control at the property. Meetings held with the owner's agent resulted in this planning application and officers will be pursuing any unresolved matter. As such, concerns raised in relation to other works alleged could not form a reason for refusal of this planning application.

Concern has also been expressed at the fact that if the touring caravans were to be allowed to remain on-site over the winter period, this would be tantamount to the caravans being on-site permanently. It is recognised that this may well occur – the site operates between the 1st March and 9th January in any one year, and the original 1993 planning permission does not specify a maximum stay period, therefore a touring caravan could legitimately choose to stay for the whole period. However, it is considered that the storage of the caravans through the winter period is not harmful, as it is within an existing caravan park setting, as opposed to an undeveloped countryside landscape, where the visual impact would be more of a contrast and therefore of more visual harm.

### **Conclusion**

The winter storage of 35 touring caravans would not be considered to have a harmful effect on the existing landscape setting – the appearance of the site as a tourist facility is established; and whilst the storage of caravans in rural areas where there would be a clear visual conflict with an undeveloped landscape setting would not be supported, in this instance, there would be no significant change in the character of the established site, where caravans would be stored on exactly the same pitches.

In light of this, the proposal would not be considered harmful to its setting, nor would harm the special qualities of the National Park setting. The application can be supported by officers, and the recommendation is, therefore, of approval, subject to conditions.



Item 5 - Report on Planning Applications

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**Recommendation**

That the application be approved, subject to the following condition:

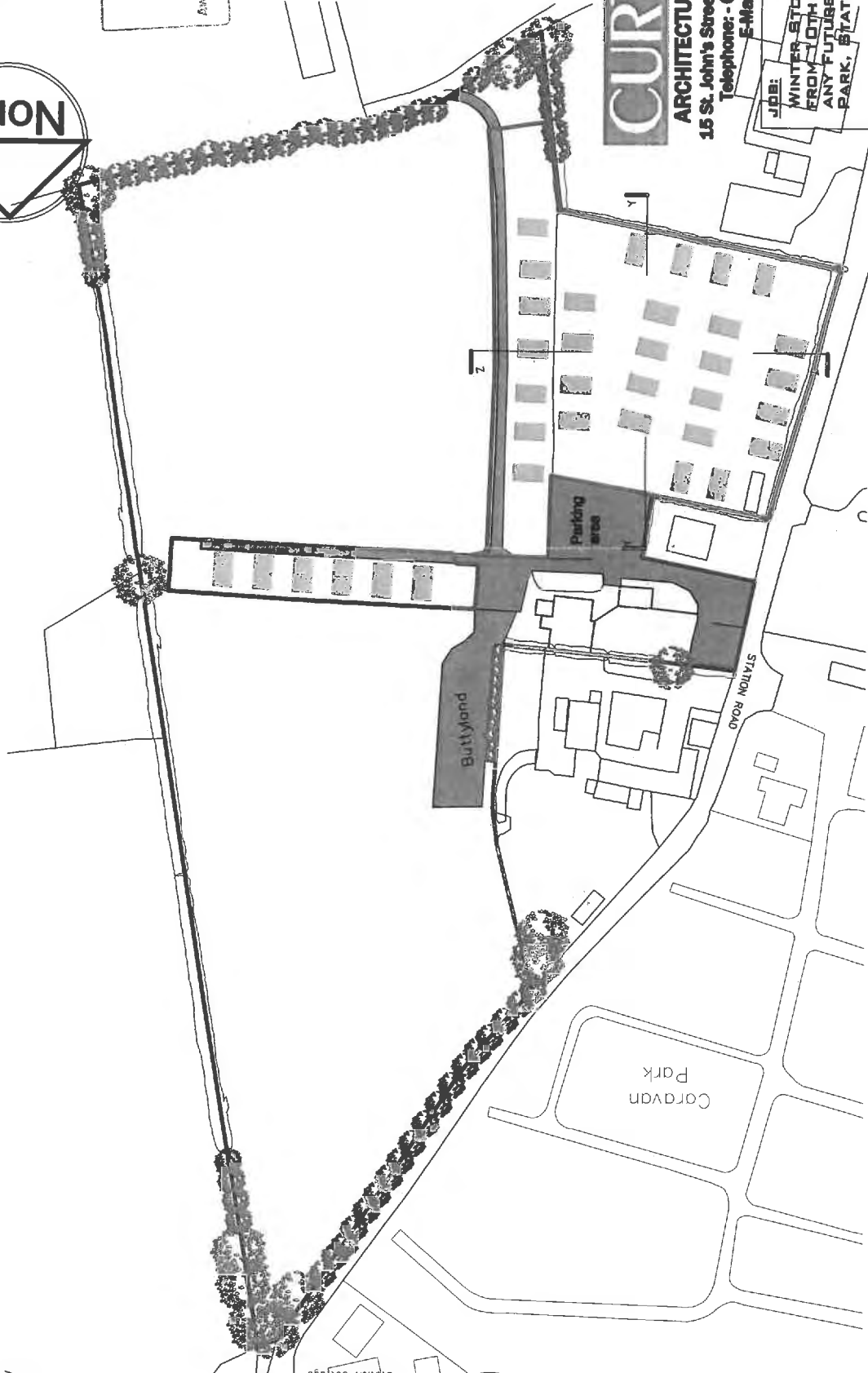
1. The development hereby permitted shall be carried out, in accordance with the deposited plans referenced 849.2/14/01 and 849.2/14/02 received on the 3rd March 2015.  
**Reason:** To ensure a proper standard of development and appearance in the interests of conserving the amenities of the area. Local Development Plan - Policies 1 - National Park Purposes and Duty, 8 - Special Qualities, 15 - Conservation of the Pembrokeshire Coast National Park, 29 - Sustainable Design and 30 - Amenity.



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REGIONAL PLANNING DEPARTMENT  
- 3 MAR 2013  
AMENDED PLAN 15131

NP 15 1 31



# CURTIS BLAINE

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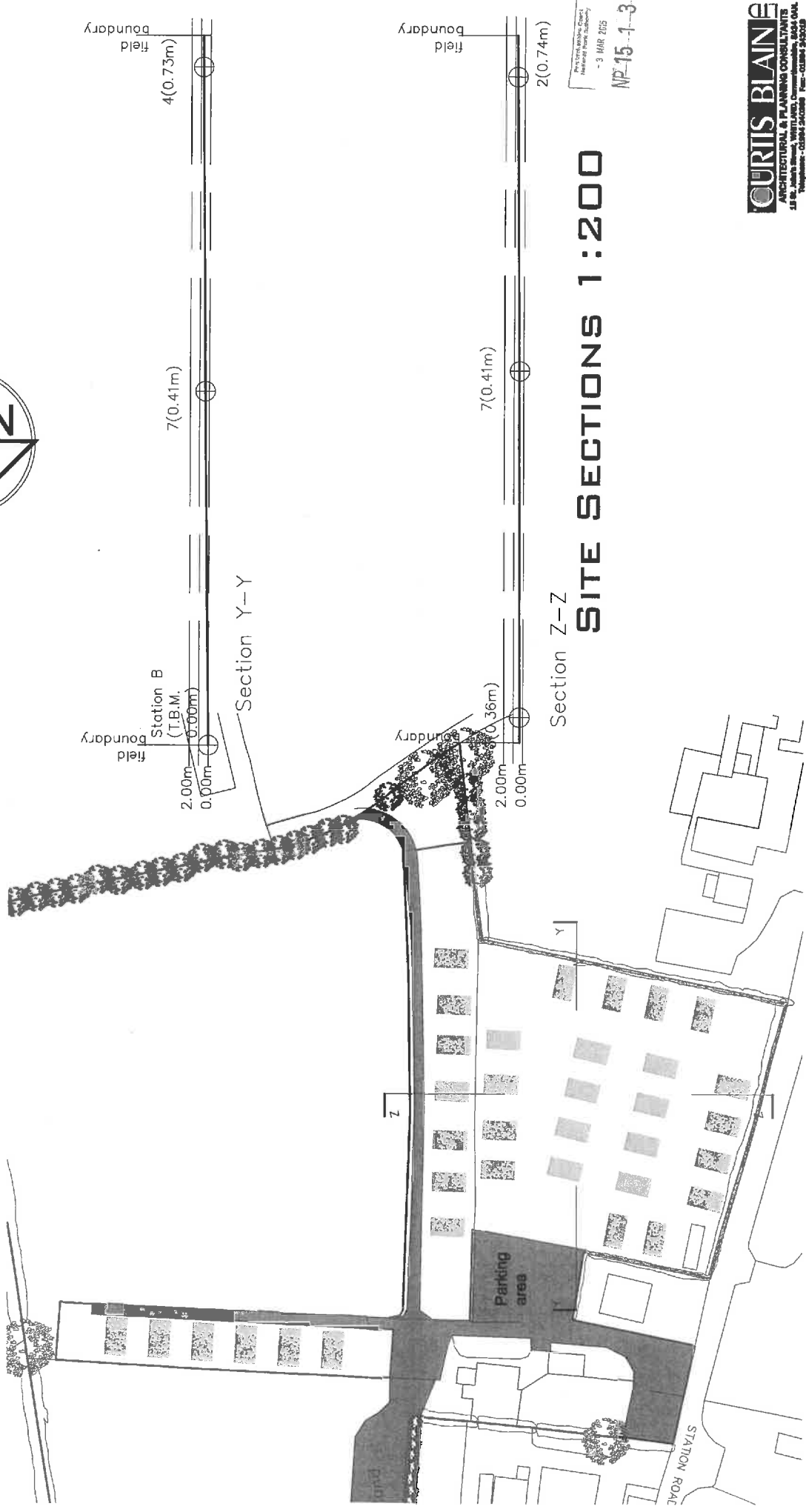
JOB:  
WINTER STORAGE OF 35 TOURING CARAVANS  
FROM 10TH JANUARY TO 28TH FEBRUARY IN  
ANY FUTURE YEAR AT BUTTLYLAND CARAVAN  
PARK, STATION RD, MANORBIER

DWB. TITLE: LOCATION PLAN AS EXISTING	
DRAWING-NO: B49.2/14/D2	DATE: MARCH 2014
DRAWN BY: S. PATEL	CHECKED BY:
CLIENT: MR. D. BROWN	SCALE: AS SHOWN A3

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## LOCATION PLAN 1/1250

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Prepared by: Robert Hayward  
 Checked by: Robert Hayward  
 Date: 03 MAR 2015  
 NP 15-1-3

**SITE SECTIONS 1:200**

**SITE PLAN 1/500**

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JOB: WINTERS STORAGE OF 25 TONS OF DAWKINS AND 10 TONS OF 20TH FEBRUARY IN AND FULLY EQUIPPED DAWKINS PARK, STATION RD, WIMBORNE	
DATE: 03 MAR 2015	SCALE: AS SHOWN (A)
DRAWN BY: R. BROWN	DATE: 03 MAR 2015
CHECKED BY: R. BROWN	SCALE: AS SHOWN (A)