

6. FULL APPLICATION – PROPOSED SITING OF 35 STATIC HOLIDAY CARAVANS IN LIEU OF 60 TOURING CARAVAN PITCHES AT NEWHAVEN CARAVAN PARK, UNNAMED SECTION OF A5012 FROM A515 TO NEWHAVEN CROSSING, NEWHAVEN (NP/DDD/1225/1259) GG

APPLICANT: M PURDOM

Summary

1. This application seeks full planning permission for the changing the use of land within the existing holiday park from touring caravan pitches to the stationing of static caravans.
2. The proposal is an exception to the policy presumption against static caravans and represents a potential departure from the Development Plan.
3. The site is well-established and this part of the site is screened in the wider surroundings. The proposals present an opportunity to provide for landscape and biodiversity enhancement.
4. The application is recommended for approval.

Site and Surroundings

5. Newhaven Holiday Park is situated at the junction of the A515 and the A5012, opposite the former Newhaven Hotel. The site is bounded on two sides by the A roads, and by open fields to the south and east. Much of the site is largely screened from public vantage points because a 2m high earth embankment runs along the northern and most of the western side, which together with a wide belt of mature trees restricts views from the two nearby A roads. The approved access to the site is from the A5102 at the north east corner of the caravan park, although there is also access directly onto the A515 to the west.

Proposals

6. Full planning permission is sought for the siting of 35 static holiday caravans in lieu of 60 touring caravan pitches.

RECOMMENDATION:

That the application be APPROVED subject to the following conditions:

1. **Statutory 3 year time limit for implementation**
2. **In accordance with submitted and amended plans**
3. **28-day holiday occupancy restriction**
4. **Colour range of units to be approved and implemented**
5. **In accordance with the Tree Protection drawing prepared by Barrell Tree Consultancy (drawing number 25062-TPP-01)**
6. **Programme of monitoring and site supervision of arboricultural measures to be approved**

7. **Tree planting to be carried out in accordance with the Landscape Proposals (Phase 2) and retained**
8. **All recommendations/mitigation detailed within Section 6 of the Preliminary Ecological Appraisal implemented**
9. **Biodiversity Net Gain plan to be implemented**
10. **Parking plan to be approved**
11. **Travel Plan to be approved if approved parking plan includes provision of more than 35 spaces**
12. **Electric vehicle charging facilities**

Key Issues

- The principle of development
- Impact on the landscape character and special qualities of the National Park
- Tree impacts
- Ecological impacts
- Travel and transport

History

7. The site has been in operation since the 1960's and has a complex planning history. However, permission granted under NP/DDD/1009/0860 consolidated and rationalised the previous permissions and lawful use certificate into one single over-arching permission that provides clarity on the 'lawful' use of the site in terms of planning controls.
8. Subsequently, conditions 2 and 7 on NP/DDD/1009/0860 were formally discharged under Planning Application NP/DIS/0212/0143.
9. In 2015, a section 73 application was approved which sought to remove condition no. 6 from planning application ref NP/DDD/1009/0860. That condition stated that 'No touring caravan or tent shall be placed or retained at the site (other than in the designated winter storage area) for a continuous period exceeding 28 days.'
10. In 2017, a section 73 application was approved which sought to vary the same conditions no's 6 and 10 from planning approval ref NP/DDD/1009/0860. The application was approved but a additional condition was re- appended to limit touring caravans to no more than 28 days occupancy in order to prevent touring caravans from becoming permanent dwellings.
11. In 2019, permission was granted for the relocation of 16 static caravans to the central area of the site, together with the siting of a further 10 static caravans within this area. This is the area immediately to the north and west of the access road circling the current application site.
12. In 2025, planning permission was granted for the siting of 24 static holiday caravans, with additional landscaping, in lieu of 28 touring caravans and two tented camping areas in the northern part of the caravan park (NP/DDD/1024/1137)

Consultations

13. Highway Authority – recommend that the application is deferred pending additional information.
14. District Council – no response.
15. Parish Council – no response.
16. PDNPA Policy – no response.
17. Environment Agency - no objection but draw the Applicant's attention to informatives.
18. Natural England – no objection.
19. PDNPA Ecologist – no objection subject to conditions and the attachment of informatives to any grant of planning permission.
20. PDNPA Tree Conservation Officer – no objection subject to conditions.
21. PDNPA Landscape Architect - given the existing permission, don't have significant concerns from a landscape point of view but would like to see, if possible, additional tree planting (to break up the mass of proposed statics) and additional understorey planting (to increase screening).

Representations

22. None received at time of writing.

Main Policies

23. Relevant Core Strategy policies: GSP1, GSP2, GSP3, GSP4, DS1, L1, RT3, T1, T2, T7 & CC1
24. Relevant Local Plan policies: DMC3, DMC12 & DMC13

National Planning Policy Framework

25. The National Planning Policy Framework (NPPF) is a material consideration. Development plan policies relevant to this application are up-to-date and in accordance with the NPPF and therefore should be given full weight in the determination of this application.
26. Paragraph 189 of the NPPF states: Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks.

Assessment

Principle of development

27. The proposed development would result in the loss of 60 touring caravan pitches and their replacement with 35 static caravan pitches which would be on site all year round. They would be permanent structures, with their own facilities, although they would also have access to the wider site facilities.

28. Policy RT3 B of the Core Strategy explicitly states that static caravans, chalets or lodges will not be permitted. However, the supporting text says that, exceptionally, static caravans, chalets or lodges may be acceptable in locations where they are not intrusive in the landscape. Policy RT3 therefore makes a general and strong presumption against this type of development. However, there is acknowledgement in the supporting text to this policy that there may be sites suitable for such development in exceptional circumstances. The proposal is therefore in conflict with policy RT3 unless it can be demonstrated that there are exceptional reasons for approval. The exceptional reasons for approval in this case are:

- the site is well screened from wider views by mature planting
- the site is a well-established caravan park with an existing mixture of static and touring caravans and tents.
- additional planting and landscaping, and securing of existing screening provide an opportunity to materially reduce the whole site landscape impact.

For these reasons, the application is not considered to be a major departure from the development plan.

29. The application does not propose a 28 day occupancy restriction. Instead the proposal is to restrict occupancy of the static units to the extent that each cannot be a permanent residence for any single person. Whilst the submission suggests a further planning condition that allows occupation “for holiday purposes only”, ‘holiday purposes’ is undefined and in practice the conditions proposed by the Applicant would allow occupation of the units by any one person for up to 11 months a year. This would be tantamount to a permanent dwelling or second home and wholly contrary to housing policy in the National Park.

30. The proposed occupancy conditions would not comply with current adopted planning policy. Policy DMR2 of the Development Management Policies addresses occupancy for touring caravans rather than statics (because there is a presumption against support for such development in the first place), but the supporting text does more broadly, and very clearly, define what the Authority consider to represent holiday occupancy:

“The National Park Authority defines holiday use as occupation for no more than 28 days per calendar year by any one person. Anything over 28 days occupation by any one person is classed as full-time residential use and will be prevented where necessary by the enforcement of conditions or legal agreements.”

31. In the absence of a precise and enforceable holiday occupancy condition the proposed development would not be acceptable in principle. As such, the proposed occupancy conditions would not make the development policy compliant. It is therefore recommended that a 28-day occupancy restriction is imposed on the units in accordance with policy DMR2 and to prevent occupancy as permanent dwellings contrary to adopted housing policy. This matter has been discussed with the Applicant who has advised that they would, without prejudicing their right to appeal, accept this planning condition for the benefit of securing a permission overall.

Landscape

32. As this report sets out above, the site is well established and set in a wooded environment. The Landscape Officer advises of no significant concerns from a landscape point of view, but would like to see, if possible, additional tree planting, to break up the mass of the proposed static caravans, and additional understorey planting to increase screening. Some additional planting is detailed on the Landscape Proposals Plan (Phase 2) to permeate the site but the Landscape Officer has requested that this be increased.

33. The Applicant contends that additional planting within the site itself will not have a significant bearing on screening, as the massing of the caravans would not be perceptible beyond the park boundaries as detailed in the submitted visual survey. Furthermore, the Applicant is concerned about increased maintenance requirements and potential risks that, as trees mature, they may impact on the caravans, including loss of light and the potential to impact on services/utilities; this is considered a reasonable concern. The Applicant's preference would therefore be to retain the current level of internal planting. Nevertheless, it is considered reasonable to attach a condition that the landscaping detailed on the submitted landscaping plan be provided in the first planting season after the static caravans first being brought into use.
34. In respect of the understorey planting, the Applicant has already proposed a strip of native hedgerow as well as structure planting to the eastern edge of the development to mitigate views, as well as another row of structure planting along the easternmost boundary of the site. It is noted that the Landscape Officer focuses the understorey planting towards the existing trees. However, it is the Applicant's view that the layers of planting already proposed will achieve the same goal, and Officers consider that is confirmed within the visual survey.
35. The Applicant also makes the same point with regard to the southern boundary of the application site, and that the provision of additional planting there will not have an impact on screening as it will not be perceptible beyond the park boundaries. To this end, it is considered reasonable to address further landscaping being in accordance with the Landscape Proposals (Phase 2) drawing and in accordance with Biodiversity Net Gain requirements for the site in lieu of the proposed extent of development. There is also scope to control the colour of the proposed units; a control that the Authority does not currently have in relation to the use of this field by touring caravans and tents.
36. Taking these matters into account, and the specific circumstances of this site, it is concluded that the replacement of the seasonal touring units on this part of the site with static caravans with a holiday occupancy condition, is acceptable, subject to conditions to secure additional planting and the colour of new units brought to site as part of the development. With those safeguards, the development would conserve and enhance the landscape of the locality as required by policies GSP1, GSP3, L1, RT3, of the Core Strategy and policy DMC3 of the Development Management Policies.

Tree impacts

37. The PDNPA Tree Conservation Officer advises that application concerns trees which are not within a Conservation Area and are not covered by any existing tree preservation order (TPO). The submitted Tree Protection drawing is advised to be thorough and addresses all necessary aspects. The Landscape Proposals (Phase 2) drawing is also advised to be thorough and has a particularly good mix of species suitable to the landscape character and to the specific site conditions.
38. Conditions have been suggested, which include a condition for monitoring/supervision at appropriate points, as this is a clear recommendation of the Tree Protection document and also with regard to the provision of protective fencing and ground protection during the installation of the static caravans and that any new trees shall be planted as shown on the Landscape Proposals (Phase 2) no later than in the first planting season after the completion of the development. With those safeguards, the development would conserve and enhance the landscape of the locality as required by policies GSP1, GSP3, L1, RT3 of the Core Strategy and policies DMC3 and DMC13 of the Development Management Policies.

Biodiversity

39. The proposals are subject to statutory Biodiversity Net Gain (BNG) requirements and the completed metric and design report have been submitted. The Authority's Ecologist advises that the proposals will create an uplift of 0.21 habitat units and achieve a 13.23% net gain and, therefore, the minimum requirement for Biodiversity Net Gain (10%) can be met. It is advised that the habitat creation, to achieve a 10% net gain, can be secured by a planning condition. Final details of how the biodiversity net gain measures will be achieved (i.e. the habitat creation and management), as detailed within the BNG Report, will also need to be subject to a condition that the details need to be submitted to the Authority for approval, along with the statutorily required BNG Plan.
40. Construction activities have been highlighted as causing potential negative impact (temporary disturbance) to legally protected species including badgers, foraging bats and breeding birds but valuable habitat for species such as birds, bats and badgers appear to be limited to adjacent habitats (such as woodland). The Authority's Ecologist advises that all surveys have been undertaken in line with the relevant guidelines and an appropriate impact assessment has been undertaken along with details for appropriate mitigation/compensatory methods for all surveyed species/habitats; all recommendations made in Section 6 of the submitted Preliminary Ecological Appraisal (PEA) are welcomed. Informatives are required to be attached to any grant of planning permission with regard to great crested newt and bird protection and a lighting advisory regarding bats.
41. On this basis, the proposals comply with policy L2 of the Core Strategy and policy DMC12 of the Development Management Policies, which require the ecological interests of the site to be protected.

Highway Safety, Parking, and Transport impacts

42. A Transport Statement (TS) has been submitted and provides a brief overview of Personal Injury Collisions (PIC) with basic details provided such as location, date of collision and vehicle involved. The PIC data shows there has been one serious accident directly adjacent to the site access and eight PIC at the junction of A515/A5012. An up to date review of Crashmap shows there are now a total of 9 PIC at the junction of A515/A5012 with an additional collision with a severity of serious. No details of causation factor, time, weather, road surfacing, vehicle movements, etc has been provided.
43. A plan of the revised layout of Phase 2 is provided in the TS, with a reconfigured one-way loop. Although dimensions of width of access road and parking bays have not been provided, this is considered acceptable. With regard to servicing and refuse collection the TS states existing refuse collection strategy serving the wider site will continue to be acceptable and remains unchanged.
44. From review of the TS report, the trip generation is based on the net difference between the current (60 touring caravan pitches and 6 static caravans) and proposed quantum (35 static caravans) of development. Although this methodology is acceptable in principle, no details of the total current and proposed schedule of the site has been provided. Additionally, the Local Highway Authority consider that the trip generation for a static caravan site is generally higher than a touring caravan site.
45. However, it should be appreciated that the Local Highway Authority raised no objection to the proposals submitted in the Phase 1 planning permission and Officers consider that the differences in the potential comings and goings associated with 60 touring caravans, as opposed to 35 static caravans, is marginal. In addition, the proposals would mean that towed caravans would not be entering/leaving the site and it is considered that, whilst

the Local Highway Authority have requested further analysis, that this is not reasonably necessary in this case.

46. As part of the Phase 1 application approval, the submission of a Travel Plan was conditioned. The Travel Plan submitted in response to the condition has been briefly reviewed which, in conclusion, states a Travel Information Pack (TIP) was prepared and given to patrons of the campsite. No details of this have been submitted with the current application, but this can be attached as a condition to any grant of planning permission.
47. The proposed development includes two parking spaces per unit. In their consultation response on the previous planning application, the Authority's policy team stated:

The number of parking spaces is contrary to the Peak District National Park Parking Standards, which set a maximum of 1 space per plot. This approach is aimed at providing sufficient parking whilst not providing an oversupply. Our approach is based on an emphasis in encouraging sustainable transport as set out within Core Strategy Policy T1: Reducing the general need to travel and encouraging sustainable transport. This approach focusses on making best use of the limited amount of land available for any development within the National Park.... There may be justification for the provision of additional visitor parking to serve the units. There may also be scope to justify the need for the 10 twin lodge units to have two parking spaces. However, these are holiday accommodations rather than permanent residencies. Therefore, any deviation from the maximum parking standards will require robust and detailed justification.

48. No justification has been put forward to deviate from adopted parking standards. It is therefore recommended that, if permission is granted, a condition be imposed for final levels of parking provision to agreed, notwithstanding the approved plans, as required with the previous planning permission for the site to the north.
49. The policy team response also notes that the provision of 2 parking spaces per unit challenges the assumptions around traffic movements. The current 60 touring pitches (including tents) would typically be expected to attract a single vehicle. If each of the 35 proposed static units was to attract two vehicles, then this would result in some 70 vehicles in total. As such, an increase of 10 vehicles at the site would arise during peak occupancy.
50. On this basis, given the nature and scale of development, it would be appropriate to secure a Travel Plan by condition to ensure accordance with policy T2, which seeks to reduce traffic movements and promote sustainable travel. Whilst the recommendation of the PDNPA Policy team on the previous application was to apply to the site as a whole, and it might be that this is a logical approach that the Applicant adopts, a Travel Plan could only be reasonably required by condition insofar as it relates to the proposed development, given that the remainder of the site would be unaffected in terms of traffic generation. This would amount to updating the travel Plan required under the previously approved Phase 1 development.
51. Should the application be approved and the outcome of the condition regarding the amount of parking provision result in the development not giving rise to an increased level of parking provision, it would not then be reasonable or necessary to require a Travel Plan. Therefore, any condition requiring the submission and approval of a Travel Plan should be framed with that caveat.

Climate Change Mitigation

52. The nature of the development limits the extent of measures that can be incorporated in to the development. Tree planting is the only measure beneficial to carbon reduction that

is proposed but a condition can be attached that the facilities for the charging of electric vehicles be provided at the site. Given the nature of development proposed, it is concluded that further measures could not be reasonably required to further compliance with policy CC1.

Amenity

53. The site is sufficiently removed from any neighbouring property that the development would have no bearing on residential amenity; and in any case, noise disturbance from occupation and vehicle movements would be reduced by the development, whilst the overall screening around the site edges would be increased. As such, the development would comply with policy DMC3 of the Development Management Policies insofar as it relates to protecting the amenity of other properties.

Other Matters

54. In terms of continuing to provide access for a range of visitor types to the National Park, the site would now have limited potential to offer touring caravan and camping pitches on the site. However, whilst this is regrettable, it is not considered a reason that would substantiate a refusal of planning permission.

Conclusion

55. The proposals represent a departure from Development Plan policy and there is a risk that, despite the exceptional circumstances in this case, long-standing policy that seeks to prevent static caravans, because of their potential to cause harm to landscape and special qualities, is undermined. However it is considered that this risk is low, taking into account the operation of strategic policies that must be read in combination and give greatest weight to the conservation and enhancement of valued landscape character.
56. This part of the site is well screened from wider view by mature planting. The application site is already in use for the siting of touring caravans and the Authority has no control over the colour, which is often a bright white, or the more general appearance of the caravans. On this basis, it is concluded that the development would not be so intrusive in the landscape. The site is relatively large and this part of it is generally well screened. There would be a more limited range of accommodation, by essentially removing the touring caravan provision, but there would be a range of static caravans across the site which would nevertheless continue to contribute to facilities to allow for the enjoyment of the National Park.
57. The approval of this application would not set a precedent for further approvals on the site, because this part of the site already has a lawful use for a long season for touring units, and its further development would not impact the landscape. The recommendation also takes account of, and gives weight to, the related landscape and biodiversity enhancements that the development would deliver, if secured by condition. As such, given the consideration of the details of the scheme, it is concluded that the proposal is acceptable as an exception to the normal presumption in policy RT3B of the Core Strategy against permanent static caravans and lodges.

Human Rights

Any human rights issues have been considered and addressed in the preparation of this report.

List of Background Papers (not previously published)

58. Nil

Report Author and Job Title

59. Gareth Griffiths – Planner - South