# Report of 29 February 2012

| <b>Wrotham</b><br>Wrotham | 559902 160887  | 4 November 2011   | T <b>M</b> /11/03055/FL  |
|---------------------------|--|---|--|
| Proposal:                 | TM/01/01069/FL<br>round basis with<br>remaining in force<br>caravans (TM/01)<br>planning permiss | ation to vary the conditi<br>to allow the use of touri<br>the original condition 4<br>e in respect of the 30 ap<br>/01069/FL being Variat<br>ion TM/81/886 to allow<br>avans, and winter storag | ing units on a year<br>of TM/01/01069/FL<br>oproved static<br>tion to condition (v) of |
| Location:                 |  | an And Camping Park I<br>aks Kent TN15 7PB  | Plaxdale Green Road  |
| Applicant:                | Thriftwood Holida  | ıy Park   |  |

#### 1. Description:

1.1 Planning permission is sought to vary the terms of condition 4 of TM/01/02373/FL. That application was itself a variation to condition (v) of planning permission TM/81/886 to allow siting of 150 touring and 30 static caravans, and winter storage of 50 touring and 30 static caravan. Condition 4 currently states:

"The number of pitches on the site shall be restricted to a maximum of 150 touring units and 30 static units, with the 30 static units being located only in the positions detailed on drawing BB/THRIFTWOOD/01/01 dated September 2001. Consistent with the provisions of condition 2 of planning permission TM/81/0886, the use of the site for camping and caravanning shall be restricted to the months of January and from March to December inclusive in any one calendar year, with the static units similarly not being occupied for any purpose during the month of February. Winter storage shall be limited to a maximum of 80 units (including the 30 static units hereby permitted), with any such units being stored only in the approved locations detailed in drawing no. BB/THRIFTWOOD/01/01 dated September 2001. Occupation of the static units shall be limited to holiday and tourist purposes only and there shall be no permanent residential use of the site."

Reason: In the interests of safeguarding the visual amenities of the site, which falls within the open countryside, the Metropolitan Green Belt and the Kent Downs Area of Outstanding Natural Beauty and because an overintensive use of the site could give rise to additional undue highway hazards'.

- 1.2 The applicant originally stated in their submission that they have a high number of visitors from abroad visiting the site, visiting to see Kent and London. The applicant states that they have received a number of enquiries for the 2012 Olympic Games. The applicant suggests that the restriction preventing the use of the site in February is out of date because modern caravans are 'winterised' and capable of occupation in February, which do not differ necessarily from conditions in other winter months.
- 1.3 However, following the agent noting concerns expressed by local residents and the Parish Council, they amended the application to year round occupation by the touring units only. This has been the subject of renotification and any further responses will be included in a supplementary report.

## 2. Reason for reporting to Committee:

2.1 The application was called in by Cllr Balfour due to the locally controversial nature of the application.

#### 3. The Site:

- 3.1 It is an established camping park, featuring both static caravans and pitches for touring caravans and tents. It is set in an elevated position above Plaxdale Green Road, and surrounded by open farmland on all four sides. The site includes some trees. There is a wooded area to the western side and also features tree screening along its boundaries subject to an Area TPO. The eastern side of the site is designated as ancient woodland.
- 3.2 The site is in the MGB. It abuts the AONB but is not within it.
- 3.3 A Public Footpath runs through the site. The site lies on a Water Gathering Area.

## 4. Planning History (selected):

TM/56/10814/OLD Refuse 30 July 1956

Outline application for residential development.

TM/57/10532/OLD Refuse 29 March 1957

Outline application for one dwelling, outbuildings on small holding.

TM/63/10718/OLD Refuse 21 February 1963

The formation of holiday camping site.

TM/70/10503/OLD Refuse 23 November 1970

Extension of camping site.

TM/81/10549/FUL grant with conditions 7 December 1981

Use of land for camping site including trailer tents, dormobiles, touring caravans, and winter storage incorporating site with existing permission for tented camping.

TM/89/11188/FUL grant with conditions 3 May 1989

The stationing of one residential mobile home to be occupied by warden.

TM/89/11189/FUL Grant 20 March 1989

Variation of condition (iv) of permission TM/81/886 to permit winter storage of 50 touring caravans (instead of 30).

TM/90/11605/FUL grant with conditions 13 June 1990

Application to vary condition (v) of permission TM/81/886 (use of land as camping site) to extend season from 1st March to 31 January of the ensuing year.

TM/91/10191/FUL grant with conditions 15 April 1991

Renewal of permission TM/89/0006 for the stationing of one residential mobile home to be occupied by warden.

TM/94/01118/FL grant with conditions 8 February 1995

Formation of hardstanding, variation of condition (ii) of TM/90/0073 to allow for siting of 150 touring units and 10 static holiday caravans, and variation of condition (iv) TM/81/886 to allow for the winter storage of 50 touring units and 10 static holiday caravans

TM/95/51651/FL Grant With Conditions 15 February 1996

construction of covered swimming pool

TM/95/51654/FL Application Withdrawn 4 February 1997

variation of condition 02 of planning permission TM/94/1581FL to allow caravan park to operate throughout the year

TM/96/00034/FL Grant With Conditions 2 April 1996

provision of a wooden chalet for use as a shop

| TM/96/01345/FL | Grant With Conditions | 14 November 1996 |
|----------------|-----------------------|------------------|
|                |                       |                  |

change of use from garage to licensed club

TM/98/01268/FL Grant With Conditions 15 October 1998

variation of cond. (ii) of TM/90/0073 to allow for siting of 150 touring units and 20 static holiday caravans and variation of cond. (iv) of TM/81/886 to allow winter storage of 50 touring and 20 static caravans

TM/99/02471/FL Grant With Conditions 29 December 1999

extension to club room and new reception area

TM/01/02373/FL Grant With Conditions 14 December 2001

Variation to condition (v) of planning permission TM/81/886 to allow siting of 150 touring and 30 static caravans, and winter storage of 50 touring and 30 static caravans

TM/01/02400/FL Grant With Conditions 14 December 2001

New clubhouse

TM/02/03166/FL Grant With Conditions 2 January 2003

Demolition of ex-manager's house and construction of new manager's house on the same site

TM/07/02572/FL Application Not 26 February 2008 Proceeded With 10no. lighting columns and 3no. bulkhead floodlights

TM/10/01069/FL Refuse 18 June 2010

Variation of Condition 4 of planning consent TM/01/02373/FL (variation to condition (v) of planning permission TM/81/886 to allow siting of 150 touring and 30 static caravans, and winter storage of 50 touring and 30 static caravans)

4.1 The site has been the subject of a number of enforcement investigations. Currently my enforcement officers are negotiating on the external lighting of the site. The owner has undertaken a programme of replacing inappropriate floodlights with

lamp columns with the light angled downwards in an attempt to strike a balance between the need for some lighting for safety purposes and more general light pollution.

There is still floodlighting of the caravan store which is necessary for security. The owner has agreed to investigate making that movement sensitive to minimize the time of the glare to the surrounding rural area.

## 5. Consultees:

- 5.1 EA: No comments.
- 5.2 PROW: No objections in principle.
- 5.3 Stansted PC: Unanimously objects. We do not believe that the application has shown sufficient need as required under "The Good Practice Guide on Planning for Tourism". In addition, it is contrary to Green Belt policies, as described in the previous refusal TM/01/02373/FL.
- 5.3.1 There is significant disquiet about this application. The Parish Council has had a site visit with the owners to understand their reasons for wanting to extend the existing period. Following this meeting, we do not believe that the owners could provide evidence that there is sufficient demand for year round occupancy. Thus, as per our previous rejection, we believe that the extension to year round usage would be tantamount to creating residential usage which would overwhelm a small parish community of just over 200 houses compared to Thriftwood's current scale of 30 statics and 150 touring caravans!
- 5.3.2 However, we are sensitive to Thriftwood's closed period which is for the month of February and which means they cannot make use of the February half term. As a Parish we would be supportive if they were to request a change of closure month from February to January. This would have the benefit of Thriftwood being closed during the darkest period (giving some relief from light pollution to the site's neighbours) and allowing the owners to benefit from the February half term revenue.
- 5.3.3 The Good Practice Guide on Planning and Tourism states that "Developers can help their proposals to be determined quickly, and achieve a positive outcome, if they provide adequate and appropriate information in support of their application". We do not believe that the applicant has provided any proof to show that tourism and the associated benefits would increase to anywhere near a level that would outweigh the disadvantage to a small Parish inflicted by a year round licence. Indeed when asked at the site visit how many extra visitors the owner anticipated coming to Thriftwood as a result of the year round licence, the owner replied: "I have no idea".

5.3.4 As the owner has no idea of the extra demand, as a Parish we have tried to ascertain whether there is in fact a case to be made for tourism demand as required under the Good Practice Guide. To do this we have looked at campsites within a 25 mile radius of Thriftwood that can be stayed in by the general public in a static, a touring caravan or a tent.

|                   |           | Distance   | Nie of  |                  |
|-------------------|-----------|------------|---------|------------------|
|                   |           | from       | No of   |                  |
| Name              | Post code | Thriftwood | pitches | Open Dates       |
|                   | TN15      |            |         |                  |
| Thriftwood        | 7PB       | 0          | 180     | 1 Mar - 31 Jan   |
| Speedgate         | DA3 8NJ   | 4          | 5       | All year         |
| Gate House        | TN15      |            |         |                  |
| Wood              | 7SD       | 4          | 56      | 1 Mar - 31 Oct   |
|                   | TN15      |            |         |                  |
| East Hill         | 6YD       | 4          | 60      | 9 Apr - 16 Oct   |
|                   | DA13      |            |         |                  |
| The Conifers      | 9HR       | 5          | 5       | All year         |
| Oldbury Hill      | TN15 0ET  | 8          | 60      | 1 Apr - 31 Oct   |
| Braeside          | DA2 7QS   | 9          | 5       | All year         |
| Hop Farm          | TN12 6PY  | 12         | 300+    | 1 Mar - 31 Oct   |
| Wildwood          | BR6 7NY   | 15         | 10      | 1 April - 31 Oct |
| Gabriels Fishery  | TN8 5PP   | 21         | 5       | 1 Mar - 31 Sep   |
| All Hallows Place | ME3 9PD   | 22         | N/A     | All year         |
|                   | TN12      |            |         | ž                |
| Tanner Farm       | 9ND       | 24         | 100     | All year         |

5.3.5 The details can be summarised as follows:-

- 5.3.6 In addition to the sites listed above, Bourne Leisure (Haven Holidays) has currently applied to Medway Council for planning consent to add a 70 caravan touring site to their existing static caravan site at Allhallows Leisure Park. This application is at the consultation stage. The site has a closed season of December and January.
- 5.3.7 As so few sites close to Thriftwood are open in the winter months, it is difficult to get an accurate picture of actual demand. But the lack of sites being open (especially the big ones such as the Hop Farm which is a tourist destination in its own right) would seem to confirm the view that there is little or no demand. Indeed, one of the closest sites to Thriftwood advised that although their site is open year round, during the months of January and February they have no more than 1-2 caravans on site at any one time.
- 5.3.8 If Thriftwood were to be open all year round it would not create the "level playing field" argued in the application. A 12 month opening period would put Thriftwood in a monopolistic position and suck up what little camping tourism there is in North

Kent. Gatehouse Wood, East Hill and Oldbury Hill are one third the size of Thriftwood and all close for a period each year. Allowing Thriftwood to have a year round licence would be anti-competitive on the small local operators with year round licences - Speedgate, The Conifers and Braeside - who do not have Thriftwood's scale and alternative income streams.

5.3.9 To try to understand demand levels by month, we have looked at the UK national statistics for room occupancy and this shows the following:-

|        | UK Holiday nights | % of   |
|--------|-------------------|--------|
|        | (millions)        | total  |
| Jan-10 | 2.6               | 1.7%   |
| Feb-10 | 5.1               | 3.3%   |
| Mar-10 | 8.1               | 5.3%   |
| Apr-10 | 13.8              | 9.0%   |
| May-10 | 16.1              | 10.5%  |
| Jun-10 | 16.2              | 10.6%  |
| Jul-10 | 25.7              | 16.8%  |
| Aug-10 | 30.4              | 19.8%  |
| Sep-10 | 13.9              | 9.1%   |
| Oct-10 | 11.8              | 7.7%   |
| Nov-10 | 4.7               | 3.1%   |
| Dec-10 | 4.8               | 3.1%   |
| Total  | 153.2             | 100.0% |

Of which, caravans (static and touring) and camping represent the following:-

| Caravan and camping - holiday nights |      |     |
|--------------------------------------|------|-----|
| Touring caravan                      | 14.8 | 10% |
| Static (not owned)                   | 13.6 | 9%  |
| Static (owned)                       | 7.8  | 5%  |
| Camping                              | 11   | 7%  |
| Total                                | 47.2 | 31% |

The data from Visit Britain shows the following:-

|                       | 2008 – 2010 |         |
|-----------------------|-------------|---------|
|                       | Thousands   | As a %  |
| Total UK tourism      |             |         |
| nights                | 154,017     | 100.00% |
| Kent                  | 3,241       | 2.10%   |
| Tonbridge and Malling | 101         | 0.07%   |
| Sevenoaks             | 96          | 0.06%   |
| Gravesham             | 37          | 0.02%   |

- 5.3.10 The month of February only represents 3.3% of all holiday nights away in a calendar year and camping and caravanning represent 31% of all holiday nights. The three boroughs adjoining the Parish represent only 0.15% of total tourism nights in the UK over a two year period.
- 5.3.11 By using local data showing advertised campsites and government statistics, we do not believe that there is any significant demand for camping facilities in North Kent during January and February to justify the increase the application requests. If there is no significant need, then the only rationale for year round usage is to encourage residential use which the parish does not have the resources to support.
- 5.3.12 The applicant advises that "Policy EC7c specifically supports "extensions" to existing tourism accommodation where **a scale** appropriate to its location and where it **may help ensure** the future viability of such business". The applicant has failed to show that the future viability of the site is at risk by not being open during February.
- 5.3.13 At the site visit the owner advised that he is investing significant sums to upgrade the property and that it employed his two sons full time. The owner agreed that opening for an extra month would not increase the amount of full time employment on the site because during the closed period an employee could spend two weeks on maintenance and two weeks on holiday (avoiding the need to take a holiday during a busier period).
- 5.3.14 We do not believe the application has demonstrated that the "extension is simply one of the season use that will help benefit the future viability of the business, in accordance with PPS4".
- 5.3.15 The site was given permission to store up to 50 static caravans specifically to provide an income for the site during the quiet winter months. We do not believe that sufficient new income would be generated either to provide extra full time employment or to help improve the viability of the site.
- 5.3.16 We would like to correct the application's assertion that in February "there is an issue with potential holiday visitors turning up at the site entrance and having to manoeuvre back out when finding the site closed, which is both frustrating for visitors and leads to problems in terms of the safe and free flow of traffic." At no time has the Parish Council been made aware of vehicles reversing out of the campsite causing problems with traffic flow. Furthermore, when the owner was asked about this problem during the site visit, he advised that on the rare occasion a caravan appeared in February, they would let them into the park to turn round.
- 5.4 Wrotham PC: The applicant alleges that a precedent was set by a Planning Inquiry held in the Lake District that allowed holiday caravan parks to remain open throughout the year. WPC is of the opinion that the two cases are significantly

different. In the Lake District there was a shortfall in provision of this type of holiday accommodation such that continual opening served to alleviate the situation. This site however is within a mile of Butts Hill Caravan Park where there is little uptake of caravan accommodation. Opening this site all year round will serve to exacerbate the problem of local over provision.

- 5.5 Private Reps (21/9R/0X/0S) + Departure and PROW Press and site adverts. Nine objections have been received although 3 are anonymous. The 6 letters can be summarised as follows:
  - The applicant alleges that a precedent was set by a planning inquiry held in the Lake District that allowed holiday caravan parks to remain open throughout the year. The two cases are significantly different. In the Lake District there was a shortfall in provision of this type of holiday accommodation such that continual opening served to alleviate the situation. This site however is within a mile of Butts Hill Caravan Park where there is little uptake of caravan accommodation. Opening this site all year round will serve to exacerbate the problem of local over provision.
  - The site in question has caused grave, and increasing, concern to those I represent over the years. The site is NOT 'particularly well screened and generally unobtrusive' as claimed by the applicant. The screening is now poor as the original low-level screening has grown taller and the enhanced lighting is very obtrusive, looking more like a town car park than a rural village without street lighting. Trees have been cut down.
  - The site is now far larger than it was, is large by any standards and inappropriate in such a rural, Green Belt area. There is already considerable impact on the small community of Stansted in terms of vehicles (some large) parking on the narrow village lanes (as well as encountering difficulties in winter weather conditions) and visitors on foot not respecting footpaths.
  - There is considerable local concern that this application is the first step to permanent residential use (there is anecdotal evidence that some vehicles are already used year round) and the difficulty of enforcing a non-residential condition. The facilities and nature of the local community are totally unsuitable for a residential expansion on the scale that could occur if this permission is granted. This would double the size of Stansted.
  - The applicant argues that there is demand for use of the site during the February half term and therefore wishes the February restriction to be lifted. I suggest that the closed period could be changed to last from the first day of the January school term until the first day of the February half term. The site would

therefore be open during school holidays but would have a closed period for maintenance and for viable enforcement of non-residential conditions.

- Generally only 10% of campers and caravaners in the UK are from outside the country. There are plenty of empty pitches open all year throughout the country. Occupancy at the nearest year round campsite in February is described as "zero".
- As for vehicles arriving during the 'closed' period, surely they could enter the site, turn round and exit without the need to turn on the lane, by condition. Or the driveway could be re-designed. It seems very unlikely that the access component would be a potential issue for Thriftwood if they advertised their closure in February well in advance (which they do not on the website <u>www.ukcampsite.co.uk</u>.) Most holiday makers are very proficient at checking whether camp sites are indeed open before venturing to a previously unknown site and very likely to check by phone or on line in advance. It therefore seems unlikely that an influx of holiday makers will turn up unannounced and create traffic chaos in the village as they are unaware of the February closure terms.
- There is already inconvenience to locals when coaches block the lane to collect for day trips.
- To further increase the number of residents on the site and allow visitors all year round residency will inevitably have an increased negative, health and safety and security impact for local residents. My main concern relates to the health and safety and security issues that are inevitable for village residents with an increase in traffic and visitors and the possible increase of permanent residents on the site all year round
- Most industries employ staff to meet their opening times throughout the year and staff would have accepted these terms when taking on the job. The staff at Thriftwood would therefore be fully aware and accept that the site will be closed during February each year.
- I can also appreciate that Thriftwood want the site to remain open in February to keep abreast with other sites and accommodate the interests and requests from overseas visitors. Loyal holiday makers will ensure they schedule their holidays outside February and return to Thriftwood during their opening months. However, if this is not possible there are over eighty sites in Kent and at least ten of these sites are less than half an hour away from Thriftwood, if holiday makers still wish to visit Kent in February.
- I fully support the facilities and amenities provided by Thriftwood for holiday makers' world- wide for eleven months of the year but also wish to maintain the outstanding beauty and uniqueness of our small village.

- Where does the onus of responsibility lie to prove or disprove residency? What faith can local residents have in effectiveness of suggested conditions if there is already year round residency on the site?
- The impact on wildlife and light pollution has changed the area forever. Trees and woods have been cut down with no thought at to the impact on birds, animals or neighbours. The Council seems to have turned a blind eye.
- If this is permitted, the next application will be for houses. The local community cannot manage the extra families, traffic or noise.
- They say the application will bring local employment but contradict by saying they do not expect many additional visitors.
- Will the Council keep strict control over the people becoming residents?
- This will encourage Forest Hill Park to apply for year round use as well.
- The 90 degree access road is not suitable for the larger camper vans from Europe. This is dangerous for other road users and pedestrians as there is no footpath.
- There is no undue local competition for winter opening to Thriftwood from Oldbury Hill, Gate House Wood and Wild Woodland.
- A large number of trees have been cut down, the site is more of an eyesore
- There is more noise and music and fireworks.
- 5.6 The 3 anonymous objections are similar to the above with a point made that the private only static caravans are use as a first home with they leave for a month to holiday or to "bide their time" and a claim that the local economy would not benefit from the extra occupation.

# 6. Determining Issues:

- 6.1 The planning policy which needs to be taken into account in the consideration of this application includes:
  - National planning guidance: The draft National Planning Policy Framework was subject to a period of consultation from 25 July 2011 – 17 October 2011. It is for the decision making authority to determine how much weight to be attached to the draft Framework. The national planning guidance relevant to this application is considered to be that contained in PPG2 (Green Belts), PPS7 (Sustainable Development in Rural Areas) and the Good Practice Guide on Tourism.

- SEP: The Localism Bill has been granted Royal Assent, and consultation recently ended on a report which assesses the implications of the abolition or revocation of the SEP, after which orders will be prepared to formally abolish it, which is likely to take effect in Spring 2012. The Courts have held that the intention to revoke the RSSs (including the SEP) is a material consideration in the determination of applications. Notwithstanding this, due to the strategic nature of the SEP it is not considered that there are policies of direct relevance to the proposal;
- TMBCS: Policies CP1, CP2, CP3, CP14, CP24;
- MDE DPD: Policy NE4; DC5
- 6.2 The main determining issues associated with an application are whether the variation of the condition would potentially encourage owners to permanently occupy the caravans for 12 months, which would place a greater burden on local services, whether such a proposal would create what would be tantamount to a conventional residential estate in the Green Belt and outside established settlement boundaries. This would be contrary to PPG2 and PPS7 and the related TMBCS policies of CP3, CP14. The other consideration is whether such a proposal would reduce the number of pitches available for holiday purposes, which in turn would affect the holiday industry and increase pressure on health and education facilities.
- 6.3 The sustainability of the location is a consideration under policies CP1 and CP2 of the TMBCS. However, provided the use remains as site with a holiday/tourism use that is not contrary to policies that require new residential uses to be in environmentally sustainable locations.
- 6.4 Policy NE4 of the MDE DPD relates to the need to safeguard trees and woodlands including ancient woodlands.
- 6.5 Policy DC5 of the MDE DPD is a criteria- based policy for tourism and leisure uses. Key criteria are that dev should not detract form the character of the area, they will support the local economy, there is adequate highway access, no hazard to road safety, no adverse impact from lighting, traffic, activity at unsocial hours or noise. CP24 is a general policy on development that requires amenity to be protected.
- 6.6 The Good Practice Guide on Planning for Tourism recognises that the extension of season has its advantages. However, it also recognises the importance of ensuring tourism use for such sites and that the demand for this accommodation may occur in areas in which the provision of permanent housing would be contrary to national or local policies which seek to restrict development in order to safeguard the countryside. It suggests that to control permanent residential occupation, the following condition should be imposed:

- (i) the caravans (or cabins/chalets) are occupied for holiday purposes only;
- (ii) the caravans (or cabins/chalets) shall not be occupied as a person's sole, or main place of residence;
- (iii) the owners/operators shall maintain an up-to-date register of the names of all owners/occupiers of individual caravans/log cabins/chalets on the site, and of their main home addresses, and shall make this information available at all reasonable times to the local planning authority.
- 6.7 The Guide goes on to advise that 'seasonal occupancy' conditions should be used in certain circumstances only, for example, when the use of the premises or the site might affect an important species of bird during its breeding season or when it is winter feeding. It advises that Local planning authorities will need to balance the need to impose seasonal occupancy conditions with the wish to avoid exacerbating the seasonal nature of tourism in the locality and its possible adverse effects upon local businesses and jobs.
- 6.8 In the refusal of the similar application in 2010, the applicant sought permanent occupation of the site year round, but there was no offer to accept alternative controls as suggested in the Good Practice Guide. This year round use proposed then was for both the static **and** the touring units.
- 6.9 The proposal as amended would mean that the site would be used for by touring caravans and camping during the month of February and thus enable the majority of the park to be open for business all year round. However, in this current application, the applicant has accepted the need for conditional controls as suggested in the Good Practice Guide and detailed above and he has removed the 30 static caravans from the application (and these will remain subject to control over occupation). The applicant has submitted a number of appeal decisions which indicate that Inspectors are imposing the requirements of the Good Practice Guide in the manner applied for. I have carried out some research on this matter and it does appear to be the case that the appeal examples given by the applicant in support of the application do appear to represent the current norm in dealing with such matters.
- 6.10 The original proposals for the use of the site as a caravan site and for additional pitches/ caravans had been justified on the basis that it would be used for tourism for 11 months of the year. Any proposal for year round *residential* use of a caravan within the MGB would be contrary to policy and should normally be refused (save for some exceptions such as agricultural/horticultural worker's accommodation). Members will be aware that in refusing the application in 2010, it was considered that the use of the site as a holiday park for 11 months of the year meant that a clear distinction could be retained between a permanent residential use and a tourist use. However, the use of the suggested conditions in the Good Practice Guide is now accepted by the applicant. The Council has

granted year round occupation on other caravan sites in the Borough subject to the Government's suggested conditions and to do so at Thriftwood would not be inconsistent.

- 6.11 It should be made clear that without conditional control on the nature of the occupation, the proposal would be contrary to PPG2 and Policy CP3 of the Tonbridge and Malling Borough Core Strategy 2007. In the light of the evidence that the Planning Inspectorate is, unsurprisingly, supporting the approach set out in national guidance to impose the log book style of restriction, that is a material consideration with significant weight in the Council's decision making.
- 6.12 I recognise the concerns expressed by the 2 local PCs and residents that if the condition were to be relaxed, potentially owners would allow caravans to be occupied for 12 months each year, and the fears that this would place a greater burden on local services and create what would be tantamount to a conventional residential estate outside established settlement boundaries. There are also concerns that there may be a reduction in the number of statics and pitches available for holiday purposes, which would adversely affect the local tourist industry, and would potentially increase pressure on health and education services. However, for the reasons given above, I am of the view that a refusal of the application could no longer be justified in terms of the occupancy condition and the retention of the 11 month occupation restriction for the 30 static units provided that the controls now habitually applied by Planning Inspectors are also applied in this case.
- 6.13 It is accepted that the concerns of the objectors are genuinely felt in terms of amenity, noise and traffic impacts of the existing site. However, the existing situation represents the benchmark position and this application to vary the time of occupation must be viewed in that context. The extra month occupation as sought by the owner for the touring units, does not, in itself, worsen any of the considerations mentioned by the objectors in any way that would warrant refusal or deviation from the approach now adopted by Planning Inspectors in light of Government Guidance.
- 6.14 As mentioned above, the issue of the external lights is an important matter because of the impact in the wider countryside and is under investigation and a negotiated approach has been adopted. The allegation of the incursion of the site into the woodlands has been raised with the applicant who has advised that the trees removed have been dangerously leaning and that the felled timber is retained on the site for nature conservation purposes. No incursion of caravans into the woods has been observed during staff site inspections and it is the case that there is much windblown timber which could potentially be viewed as hazardous around a site for holidaymakers. However, I suggest the attachment of an informative encouraging additional peripheral planting.
- 6.15 In light of the above considerations I consider the proposal to be acceptable.

## 7. Recommendation:

7.1 **Grant Planning Permission** as detailed by Design and Access Statement dated 04.11.2011, Supporting Information dated 04.11.2011, Location Plan 001 dated 04.11.2011, Email dated 11.01.2012 subject to the following:

## Conditions

1 The number of pitches on the site shall be restricted to a maximum of 150 touring caravan units and 30 static caravan units, with the 30 static caravan units being located only in the positions detailed on drawing BB/THRIFTWOOD/01/01 dated September 2001. The use of the site for caravanning in the static units shall be restricted to the months of January and from March to December inclusive in any one calendar year. Winter storage shall be limited to a maximum of 80 units (including the 30 static units hereby permitted), with any such units being stored only in the approved locations detailed in drawing no. BB/THRIFTWOOD/01/01 dated September 2001.

Reason: In the interests of safeguarding the visual amenities of the site, which falls within the open countryside, the Metropolitan Green Belt and because an over intensive use of the site could give rise to additional undue highway hazards.

2 (i) the caravans shall be occupied for holiday purposes only

(ii) the caravans shall not be occupied as a person's sole, or main place of residence;

(iii) the owners/operators shall maintain an up-to-date register of the names of all owners/occupiers of individual caravans on the site, and of their main home addresses, and shall make this information available at all reasonable times to the Local Planning Authority.

Reason: To ensure the site is not used for unauthorised permanent residential occupation which would be inappropriate in the Green Belt.

## Informative

1 It is suggested that additional peripheral planting be undertaken to screen the site's caravans and lights from the rural locality.

Contact: Marion Geary

### SUPPLEMENTARY REPORTS

#### AREA 2 PLANNING COMMITTEE

DATED 29 February 2012

| Wrotham | TM/11/03055/FL |
|---------|----------------|
| Wrotham |                |

Section 73 application to vary the conditions of TM/01/01069/FL to allow the use of touring units on a year round basis with the original condition 4 of TM/01/01069/FL remaining in force in respect of the 30 approved static caravans (TM/01/01069/FL being Variation to condition (v) of planning permission TM/81/886 to allow siting of 150 touring and 30 static caravans, and winter storage of 50 touring and 30 static caravans) at Thriftwood Caravan And Camping Park Plaxdale Green Road Stansted Sevenoaks Kent TN15 7PB for Thriftwood Holiday Park

Private Reps: 5 Additional objections have been received which state that:

- the amendments do not alter the objections of the Parish Council and local residents:
- to restrict the 30 static vans but not the touring vans would be impossible to enforce with all the comings and goings
- People in the statics could switch to the touring units for one month thereby being saved the inconvenience of vacating the site.
- The closure should be during December when people do not generally go camping
- The site appears to be in use during February.
- The 12 month occupation of touring vans would distort the character of the community and imbalance services and facilities needed.
- Thriftwood is a holiday park and should remain so, not used for workers accommodation or for owners to go to abroad for one month of the year.
- The site has changed recently- trees being removed and boundaries delineating plots.
- There is no evidence of demand for year round use by holiday makers- the motive is for permanent occupation and this is the thin edge of the wedge.

DPTL: As outlined in my main report, I understand the concerns of objectors but the national policy situation has been endorsed by Government Guidance and as applied by Planning Inspectors such that I do not consider that a refusal is warranted.

# **RECOMMENDATION UNCHANGED**