

Use of Land for Caravan Storage

St Ives, Gainsborough Road, Sturton le Steeple,
Retford, Notts DN22 9HT

PLANNING STATEMENT

October 2023

South View, 16 Hounsfield Way, Sutton on Trent, Newark, Nottinghamshire, NG23 6PX

Tel: 01636 822528; Mobile: 07521 731789; Email: mail@town-planning.co.uk

Executive Director - Anthony Northcote *HNCert LA(P), Dip TP, PgDip URP, MA, FGS, ICIOB, MIoL, MCMI, MRTPI*

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This planning statement has been produced to support this individual planning application and the conclusions it reaches are based upon due diligence investigations of public records and the information provided to the company by the client and/or their representatives.

The author of this supporting planning report is Anthony Bryan Northcote, Executive Director of TOWN-PLANNING.CO.UK. He holds a Higher National Certificate in Land Administration (Planning) with Distinction; Diploma with Distinction in Town Planning; Post-Graduate Diploma with Distinction in Urban and Regional Planning together with a Master of Arts Degree in Urban and Regional Planning. He was elected to the Royal Town Planning Institute in 1996 and now has over 33 years planning experience within the public and private sectors involving a full range of planning issues. In addition, he is also a Member of the Institute of Leadership; a Member of the Chartered Institute of Management; a Member of the Town and Country Planning Association; a Member of the United Kingdom Environmental Law Association; a Fellow of the Geological Society; and an Incorporate of the Chartered Institute of Building.

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Project: 24.85

Planning Consultant: Anthony Northcote *HNCert LA(P), Dip TP, PgDip URP, MA, FGS, ICIQB, MIoL, MCMI, MRTPI*

Applicant: Mrs Christine Warren



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The Proposal

The proposal involves the use of land at the property known as St Ives for caravan storage. The caravan storage facility is for use by clients to self-store their own touring caravans. Caravan storage is a B8 storage and distribution use.

Existing Planning Permission

The site benefits from an extant planning permission 46/08/00012 dated 22nd December 2008 for change of Use of Land to Store Metals and Timber. That consent was implemented by a previous owner, it involved a B8 storage and distribution use.



Site in Use for Storage under Extant Consent Previously

That consent is subject to some conditions, under condition no.2 materials shall not be stored more than 2m in height and condition 3 prevents burning of materials on site. In terms of use condition 4 says that the 'premises shall be used only for the storage of materials and timber and for no other purpose including any other purpose in Class B8 of the Schedule to the Town and Country Planning (Use Classes) Order 1987'.

Condition 4 may have been intended to refer to storage of metals and timber but in fact it reads storage of materials and timber. Consequently, notwithstanding what condition 4 says the extant planning permission in fact allows for the storage of anything on the site. This is an important fall-back planning position.

As such the current planning permission would allow the site to operate for caravan storage already provided that no storage higher than 2m in height took place. Only specialist small types of caravans can be obtained that are no higher than 2m. Typically most touring caravans are around 2.6m in height, to be a caravan it cannot exceed 3.05m in height. We could pursue a s73 planning application to vary the height restriction to allow storage up to 3m in height, however, it was considered more suitable to submit a new planning application.

The Site and Surroundings

The formal address for St Ives is Gainsborough Road, however, it is actually on Sandhill Lane which is the alignment of Gainsborough Road before it was realigned to cross the railway line with a bridge rather than the previous level crossing. Sandhill Lane only serves St Ives and provides access to the nearby local wildlife site.

The site is dominated by the adjacent West Burton Power Station complex, the main access and gatehouse to the complex is located immediately to the north of the site, although at a higher level than the site.

The bungalow, St Ives has a separate garden curtilage, the storage yard area has its own entrance which is already gated with metal security gates. The storage yard is already hard surfaced and has a hedgerow along its eastern side boundary. Trees within the Power Station complex prevent views into the site from the north and west.

The mature trees and field hedgerows along Gainsborough Road prevent views into the site from the site and west. The noise attenuating fence installed along the quarry access road to the south of the site can be seen.

The Site

St Ives Bungalow

Sandhill Lane



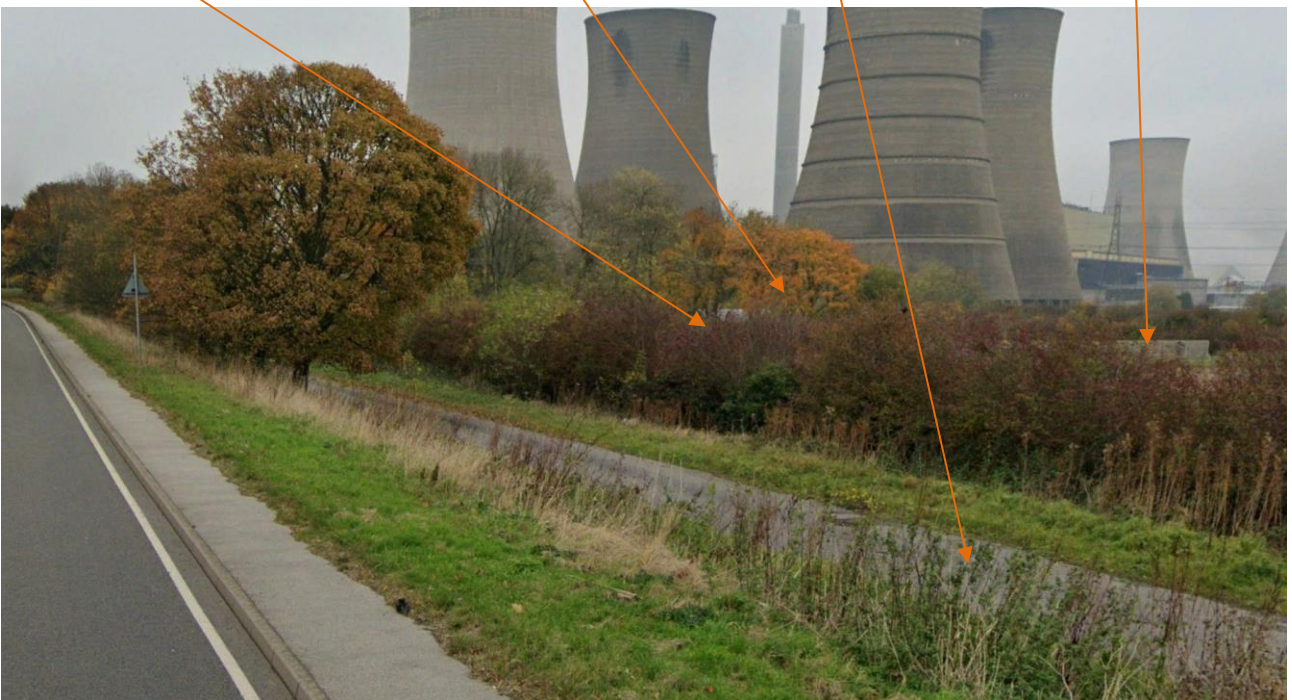
View from Gainsborough Road by West Burton Power Station Access

St Ives Bungalow

The Site

Sandhill Lane

Quarry Access
Noise Fence



View from Gainsborough Road by Sandhill Lane Entrance

The Development Plan

The Core Strategy & Development Management Policies DPD provides the vision, objectives and strategic policies for Bassetlaw District for the period from 2011 to 2028. The adopted Development Plan most relevant to the determination of this application are:

- Policy CS1: Settlement Hierarchy
- Policy CS8: Rural Service Centres
- Policy DM1: Economic Development in the Countryside
- Policy DM2: Conversion of Rural Buildings
- Policy DM3: General Development in the Countryside
- Policy DM7: Securing Economic Development

Material Planning Considerations

Other relevant material planning considerations include:

- National Planning Policy Framework
- Planning Practice Guidance

Existing Use

The site already benefits from a B8 storage use, consequently the proposed application is no different in overall nature but looks to secure the continued use of this previously developed site.

The existing consent form an important ‘fall-back’ consideration in this case and is a very important material planning consideration that must be taken into account in the decision making on this proposal.

Scale and Layout

This proposed development involves use of land. Typically, touring caravans are between 2.6m and 3m in height, the maximum legal width for any towed caravan is 2.55m. The maximum length of a touring caravan is 7m. The illustrative layout shows how up to 45 caravans could be stored on site, this is based on a maximum length of 7m, with each caravan occupying a ‘space’ of 3m in width to allow gaps between the stored caravans.

The illustrative layout assumes that owners would park their caravans away from the boundaries but this still allows a central area measuring 13m in length which is more than sufficient space for manoeuvring a caravan in and out of a space. Some owners are able to reverse their caravans into

spaces, whereas others unhitch and either manhandle the caravan or use a motorised system to reverse their caravans into spaces.

Generally, caravan storage facilities do not require on-site administration facilities. The site will be controlled via access through locked security gates for which each renter will be provided an access code. Each unit will be locked allowing access only to the renter.

No alteration will be undertaken to the existing areas of hardstanding, the overall hardstanding provides a highly suitable level surface for the continued use. The existing hardstanding on site enables vehicles to circulate including allowing vehicle to turn within the site, thus allowing them to enter and exit onto Sandhill Lane in a forward gear.

The entrance already exists in the south-east corner. Within the site space for turning will be provided. Customers generally only visit to collect and drop off their caravans. It is unlikely that more than one customer will need to attend the site at any one time

Having regard to case law including in Cardiff Rating Authority v Guest Keen 1949; Measor v SSE etc and Tunbridge Wells BC 1998; Elitestone Limited v Morris 1997; and Massingham v SSE 2002; then where the structure is capable of movement and will remain so because that is how it was designed then a caravan will be a chattel rather than a building. The important feature is mobility or potential mobility.

The site is already hard surfaced so there is no site preparation required, there are not for example any concrete pads required. The caravans will be parked on the land there will be no physical attachment. The number and type of caravans on site at any point will depend upon customer demand and their frequency of using their caravans which can be subject to seasonal fluctuations. The illustrative layout demonstrates the maximum number of touring caravans that could be put around the edge of the site whilst still leaving plenty of opportunity for turning and manoeuvring in the middle. However, for example if customer demand is only for say 20 caravans, then only that number would be sited. Any caravan storage facility has to be responsive to the level and type of customer demand, so the number and type of caravans on site at any point will always vary.

In addition, caravans are not permanent structures, they will be taken on and off site as customers want for them to use for holidays and other breaks. The parking and collection of caravans is a

process which takes only a matter of minutes, typically a caravan can be delivered or collected by a single person.

Access

The existing vehicular and pedestrian access to the site via Sandhill Lane will be retained with no alterations proposed. Access to the application site will be via the existing gateway entrance that was designed previously to allow HGV use during the timber and metal storage activity.

The existing access gates are already set back sufficiently from Sandhill Lane to allow those entering or exiting to wait off the lane itself whilst opening or closing the gates.

No HGV's would need to access the site. The number of caravans on site at any one time will depend upon customer demand, again dependent upon customer demand the size of the caravans will differ. The illustrative layout shows space for a caravan 7m in length which would be a large 6-berth caravan.

The site has previously been accessible for HGV vehicles, the nature of the previous B8 use demonstrated that there is adequate highway access for larger vehicles.

In terms of caravan storage uses to assess vehicle movements, the TRICS database has very limited information on caravan uses. We have other clients who operate existing caravan storage facilities in Nottinghamshire.

In terms of activity every caravan would generate 2 vehicle movements each time caravans are collected and 2 vehicle movements when returned (i.e. vehicle arrives to tow the caravan/return the caravan).

Based on experience of the other sites we know that some caravans are only used twice per year, i.e. 8 movements per caravan bay per year; whereas others are used more often perhaps 4 or 6 times per year, i.e. 16 or 24 movements per caravan bay per year. Based on our experience of other existing facilities, it would appear that generally those people who make the most intensive use of their caravans tend to store them at their home rather than in storage.

If we assume that a third use them twice per year, a third use them four times per year and a third use them six times per year, this would give an annual total of 612 vehicle movements. The majority of these trips would be likely to occur between mid-march and late October. The main

season is from Easter to the end of Autumn half-term. This is a season of around 7 months c.230 days resulting in an average of roughly 2.7 (rounded up to 3) trips per day in the spring, summer and autumn months.

Given the specific use of the site, based on our experience of other existing permitted sites in Nottinghamshire the trip generation shown above is expected to be realistic. The site will not employ any on-site members of staff, and people visiting their caravan to collect or to return the caravan will visit with no set pattern to times of day. Experience demonstrates that arrivals and departures are spread through the week as customers generally need to take their caravans home to load/unload before and after use. In addition, because many caravan users start early or finish late when travelling, many caravans tend to be collected and return a day each side of their trip.

The vehicle movements associated with the storage of metals and timber is unknown, but it is known that it involved HGV use and on-site employees together with visitor movements. This use intensively used the entire site and in fact aerial photographs showed that storage spilled out along Sandhill Lane itself. The previous storage of timber and metals occupied an area around 3,800m², as such it is likely that the number of vehicle movements it generated would have been significantly greater than the proposed caravan storage use.

Landscaping

The proposal will not have an adverse visual impact on the street scene. The surrounding Power Station site dominates the landscape. Given the nature of the caravans, the land levels and existing mature trees and hedgerows the site will not be overly prominent from wider viewpoints. The hedging and trees on the site boundaries provide substantial visual screening. The application site is not overlooked by any adjoining properties. The proposed caravan storage use will not present a greater impact on the visual amenity of the surrounding area.

Heritage

There are no designated heritage assets within 400m of the site, there are no entries on Bassetlaw heritage mapping within 400m of the site.

Flood Risk

As defined by the Environment Agency's Flood Map for Planning, the site is located within a Flood Zone 1 and is subsequently not considered to be at a risk of flooding. The site is also not at risk of surface water flooding.

Noise

It is proposed that there will be no detrimental noise impacts as a result of the caravan storage use as there would be no material difference in vehicles or the nature of use proposed to the existing permitted use of the site for B8 use. The applicant lives at St Ives, there are no other properties near to the site.

Planning Considerations

The proposal does not involve any changes to the proposed access, it involves no operational development, it purely relates to the use of the site including siting/parking of caravans.

Paragraph 12 of the NPPF is clear that the starting point when assessing the principle of development is the development plan. The Bassetlaw Development Plan comprises the Bassetlaw Core Strategy 2011. Policy CS1 of the Core Strategy shows that there is a settlement hierarchy in which development should be directed within the district. Sturton le Steeple is identified as a Rural Service Centre in Policies CS1 and CS8. These policies, however, are given reduced weight due to the fact that they are time expired and are not fully consistent with the NPPF.

It is noted that the NPPF is clear at paragraph 81 that planning decisions should help create conditions in which businesses can invest, expand and adapt and significant weight should be placed on the need to support economic growth and productivity.

The NPPF states that a presumption in favour of sustainable development is at the heart of the national planning policy. This should be viewed as a golden thread running through both plan-making and development management decision taking.

Importantly with regards to development management decision taking this means approving development proposals that accord with the development plan without delay; and where the development plan is absent, silent or relevant policies are out of date, granting planning permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the framework.

When taking the NPPF as a whole it is clear that the Government expects decisions taken by LPAs to proactively support sustainable economic development to deliver business, industry and economic development which meets the needs of the business community. Support for the conversion of existing buildings is also set out.

The NPPF also offers advice on economic development in rural areas in paragraph 84, it identifies that planning policies and decisions should enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings.

Strategic Objective 3 of the Core Strategy clearly outlines that to ensure the viability of Bassetlaw's rural settlements, local services and facilities should be protected and enhanced, with support for enterprises requiring rural locations duly supported.

Policy CS1 outlines that the settlement of Sturton le Steeple is categorised within the settlement hierarchy as a 'Rural Service Centre'. They are defined as *"Rural settlements that offer a range of services and facilities, and the access to public transport, that makes them suitable locations for limited rural growth"*

Policy CS8 outlines that: *"Any future development within a Rural Service Centre will be of a scale appropriate to the current size and role of that settlement and limited to that which will sustain local employment, community services and facilities."*

In relation to employment development Policy CS8 goes on to state: *"Proposals that deliver rural employment opportunities, of a scale and type appropriate to the settlement and surrounding land uses, will be supported in line with other material considerations and planning policy requirements. Economic development proposals will be supported within Development Boundaries, in line with other material considerations and planning policy requirements."*

Policy CS8 provides general support for economic development in Sturton le Steeple, as the site lies outside the current settlement boundary as defined in Policy CS1, the site is considered to be the countryside in planning terms.

Economic developments which deliver rural employment opportunities, of a scale and type appropriate to the settlement and surrounding land uses that are in line with policies DM1 - DM3 and other material considerations, will be supported.

Policy DM1 states:

"Proposals for standalone economic development (e.g. tourist attractions; equine enterprises; rural business) in rural areas will be supported where they can demonstrate that:

- i. any necessary built facilities will be provided by the re-use of existing buildings or, where the re-use of existing buildings is not feasible, new buildings are located and designed to minimise their impact upon the character and appearance of the countryside;*
- ii. the development requires the specific location proposed and there are no other suitable sites in, or close to, settlements covered by policies CS2-CS8 or on brownfield land;*
- iii. they are viable as a long-term business;*
- iv. the scale, design and form of the proposal, in terms of both buildings and operation, will be appropriate for its location and setting and be compatible with surrounding land uses;*
- v. where the proposal includes a retail use, it is demonstrated that this will not have an adverse impact on the vitality or viability of local centres; rural service centres; and shops and services in surrounding villages; and*
- vi. they will not create significant or exacerbate existing environmental or highway safety problems.”*

This proposal will continue to use a site that has an established B8 employment use, and it provides an important previously developed site in Sturton le Steeple. The nature of the use and the scale of activity on this site has been deemed acceptable on previously by the LPA. The level of traffic movements on Sandhill Lane has also been judged to be acceptable previously but will be reduced by the proposed caravan storage use.

Policy DM3 deals with General Development in the Countryside, it provides explicit support for proposals which seek to re-use previously developed land and buildings such as the site. It states:

“B. Re-use of Previously Developed Land in Rural Areas

Proposals for the re-use of previously developed land outside Development Boundaries will be supported, other than where the site has naturally regenerated to the extent that it is of biodiversity value (see Policy DM9), where they result in:

- i. the redevelopment of the site for the existing permitted use (other than where this is clearly no longer appropriate in the context of e.g. nearby residential amenity or wider sustainability issues); or*
- ii. the redevelopment of the site for a use requiring a rural location; or*
- iii. the redevelopment of the site for affordable housing or community services and facilities (where this is in line with the Spatial Strategy policies); or*
- iv. the restoration or natural regeneration of the site either in line with the Council’s Green Infrastructure aims or to become a functional part of the open countryside (e.g. sustainable wetlands); and*

- v. *development that will not create significant or exacerbate existing environmental or highway safety problems.*

Where the redevelopment of a site for the existing permitted use is clearly no longer appropriate, consideration will be given to other uses in line with the approach set out in the Spatial Strategy policies and where explicit community support is demonstrated.”

The application seeks to achieve a beneficial continued use of this previously developed site, it will help to provide contribution to the local economy and will provide caravan storage which is a continuing important type of service to homeowners that do not have the storage space available at their home for caravans or have covenants that prevent the parking of caravans.

This will benefit both the local and wider community with the provision of this facility and is appropriate in form, appearance, scale and location to its context.

Given the proposals are a continued B8 use of an existing B8 employment site it is considered that the proposals are of a type and scale appropriate to Sturton le Steeple, thereby the proposals accord with Core Strategy Policies CS8, DM1, DM2 and DM3.

The proposals do not give rise to any adverse impact upon the character and appearance of the countryside. Neither will they create significant or exacerbate existing environmental or highway safety problems. Consequently, the application accords with relevant policies of the Development Plan.

In addition to the Bassetlaw Core Strategy and Development Management Policies DPD, in Sturton le Steeple the Development Plan also includes the ‘made’ Sturton Ward Neighbourhood Plan. Planning applications are required to be determined in accordance with the provisions of the overall Development Plan, the main relevant policies of the Neighbourhood Plan include Policy 8: Supporting the Local Economy. However, this policy is silent on B8 uses, as such the Neighbourhood Plan contains no policy context relating to the principle of development.

Conclusion

The proposal will continue to use the site for the extant B8 use. Taking all matters into account we consider that planning permission should be granted.