

# Review of SG SHN2: Residential Caravans

## 1. Introduction

- 1.1 The purpose of this paper is to examine SG Special Housing Needs 2: Residential Caravans in light of changes in the national policy and local context. It will consider whether it meets the requirements of Scottish Planning Policy and other national planning documents, and whether it forms a sound basis for a policy for making planning decisions on development on residential caravans in Aberdeenshire.

## 2. Approach

- 2.1 SG SHN 2 aims to protect the environment from unnecessary and inappropriate siting of residential caravans and residential caravan sites. Residential caravans will be supported if an applicant can demonstrate that there is an economic or social need for the temporary use of a caravan. It also must respect the character and amenity of the surrounding area and be satisfactorily serviced. Residential caravan parks or a residential caravan park extensions will not normally be approved.
- 2.2 Further clarity could be given in the reasoned justification about what an economic need might be and it may be advisable to suggest that a business plan or similar should be provided where an economic case is being suggested.
- 2.3 It should be made clear in the reasoned justification that overcrowding of an existing dwelling house would not constitute a “social” need. This would be undesirable as this would constitute a housing issue rather than planning issue, and would involve more permanent rather than temporary use of a caravan.
- 2.4 It should be clarified whether or not there is a presumption against intensification of a residential caravan park as there could be instances where there is room within existing site for more caravans without any extension of the site boundary.
- 2.5 The reasoned justification suggests the construction of a house is an acceptable example of when a temporary caravan may be used. It would need to be decided if renovation of an existing house or conversion of a building to a house would also be acceptable. However this situation is covered by the General Permitted Development Order as ‘operations’, so may already be permitted in some cases.

## 3. Background

### National context

- 3.1 Residential caravans are not specifically dealt with at the national level through Scottish Planning Policy, the National Planning Framework or other guidance or advice. However, there is an expectation across all Scottish Government policy of sustainable communities and that housing is built to a high standard so that it can be retained as a future resource. There is also a general presumption against development that would have a negative visual impact on the environment. SG SHN2 supports this approach as it protects the environment from visual intrusion from residential caravans and does not advocate the use of caravans for long term habitation.

The Town and Country Planning (General Permitted Development) (Scotland) Order 2011, Part 4 Temporary buildings and uses and Part 5 Caravan Sites

- 3.2 Under classes 14 and 16 temporary movable structures such as caravans are permitted on a temporary basis for the duration of operations to which they are connected to. Once the operations have been carried out the caravan shall be removed and the land reinstated within reason to its former condition.
- 3.3 There are therefore instances where a caravan site is permitted and the reference in SG SNH2 to 'occupation during the construction of a house' would not be required. There should be reference to the permitted development order in the reasoned justification to avoid unnecessary applications for planning permission.

#### Strategic/regional context

- 3.4 Residential Caravans are not addressed by the Aberdeen City and Shire Structure Plan 2009 or the current draft of the Aberdeen City and Shire Strategic Development Plan.

#### **4. Drivers of change**

- 4.1 Neither the national or strategic policy context necessitate a change in policy. It may be advisable to refer to the Permitted Development order to provide further clarity about the instances that may be considered permitted development.
- 4.2 Further clarification could be given in the reasoned justification and some examples could be given to what would constitute an 'economic' need for a temporary caravan and what evidence might be needed.
- 4.3 The reasoned justification could include further guidance about what social need is and clarify that overcrowding would not constitute social need.
- 4.4 SG SHN2 should refer to both caravan park extension and intensification.

#### **5. Recommendations**

- 5.1 The reasoned justification should include a reference to the General Permitted Development order Parts 4 and 5 classes 14-16 for further clarification of instances where siting a temporary caravan is permitted.
- 5.2 Further clarification should be given to both the social and economic circumstances which would mean siting a caravan on a temporary basis would be acceptable.
- 5.3 SG SHN2 should be corrected to read "We will not normally approve a residential caravan park or residential caravan park extension **or intensification**"

#### **6. Summary of main points**

- 6.1 No major changes to SG SHN2 are recommended apart from some further clarification. SG SHN2 is sufficiently robust that it will protect the environment from unnecessary and inappropriate siting of residential caravans and residential caravan sites.

#### **7. References**

Aberdeenshire Council (2012) *Aberdeenshire Local Development Plan 2012*

Scottish Government (2010) *Scottish Planning Policy*

Scottish Government (2009) *National Planning Framework 2*

Strategic Development Planning Authority (2009) *Aberdeen City and Shire Structure Plan*

Strategic Development Planning Authority (2012) *Proposed Aberdeen City and Shire Strategic Development Plan*

Aberdeenshire Council (2012) *Local Housing Strategy 2012-2017*