



Appeal Decision

Inquiry (Virtual) held on 13 September 2023

Site visit made on 14 September 2023

by Andy Harwood CMS MSc MRTPI

an Inspector appointed by the Secretary of State

Decision date: 6 October 2023

Appeal Ref: APP/P1133/X/23/3320991

Park Hill Caravan Park, Moor Road, Ipplepen, Newton Abbot TQ12 5TT

- The appeal is made under section 195 of the Town and Country Planning Act 1990 as amended (the Act) against a refusal to grant a certificate of lawful use or development (LDC).
 - The appeal is made by Ross Park Homes Ltd against the decision of Teignbridge District Council.
 - The application ref 23/00126/CLDP, dated 23 January 2023, was refused by notice dated 16 March 2023.
 - The application was made under section 192(1)(a) of the Town and Country Planning Act 1990 as amended.
 - The use for which a certificate of lawful use or development is sought is described as: "Alteration to part of caravan site to alter the existing use of caravan site with 110 touring and 40 static caravans, amenity areas and ancillary facilities to a caravan site with 110 touring and 55 static caravans, amenity areas and ancillary facilities' would be lawful."
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Decision

1. The appeal is allowed and attached to this decision is a certificate of lawful use or development describing the extent of the proposed use which is found to be lawful.

Applications for costs

2. An application for costs was made by Ross Park Homes Ltd against Teignbridge District Council. This application is the subject of a separate Decision.

Preliminary Matters

3. I issued a pre-inquiry note on 9 August, approximately a week before the main parties were due to complete and exchange proofs of evidence. I had prepared this note following consideration of the written submissions made to that point and reached some preliminary views on the matters that the inquiry would need to cover, without prejudice to my consideration of the evidence and visiting the appeal site.
4. The virtual public inquiry was held on 13 September with the site visit the following day. However, because of time constraints of both parties' advocates, I could not hear closing submissions on the day. I therefore kept the inquiry open to allow for closing submissions and costs applications in writing. The inquiry was closed in writing on 5 October following a period to allow for comment on those written submissions.

5. The description of the proposal as set out above is taken from the section of the application form which asks why applicants consider that a LDC should be granted. It is repeated on the appellant's documentation including their supporting statement and the application description used by the Council on the decision. My understanding of the case is that the appellant's description of the existing use is that based upon what has been subject to previous LDCs which I will go onto explain in detail below. Briefly however, whilst the description used above refers to 40 "static" caravans there is no dispute that the relevant LDC description was for "up to 40 caravans".

Main Issue

6. It was agreed by the main parties that the main issue is whether the Council's decision to refuse the LDC was well founded with particular regard to whether the proposal would involve the making of a material change of use of the appeal site.
7. A draft Statement of Common Ground (dSOCG) was submitted shortly before I opened the inquiry and whilst this was not entirely agreed, I did seek confirmation of what appeared to be some agreed matters. It was agreed that in considering the main issue the following are relevant to take into account:
- the status of the recreational amenity areas (which were the subject of another LDC in 2019 ref 19/01975 which I will refer to as 'the 2019 LDC') and whether those are the only activities that can take place in those areas;
 - whether the proposed alteration to the caravan site would result in a change of use; and
 - whether, if there is a change of use of the caravan site, whether that change would be a material change of use.
8. Another important matter to consider in the context of the main issue, is that I have to consider lawfulness of what is proposed on the date of the application and on the balance of probabilities. For the avoidance of any doubt, it is worth emphasising that the planning merits of what is proposed is not directly relevant to my considerations of this appeal.

Reasons

9. The appeal site incorporates a tract of land on the northern part of that owned by the appellant company, which stretches from Moor Road to the west and the A381 to the east, on the outskirts of Ipplepen. Within the Council's submissions leading to the appeal and at the inquiry, a plan has been used to explain the different parts of the land within the appellant company's ownership. This was particularly useful in building up a picture of the site and referencing various parts of the site. A further iteration of that plan was included in the dSOCG to refer to another field also in the same ownership. Given that this plan is a helpful reference, I have appended it to this decision to assist my reasoning and will refer to fields 1 – 5 as shown on that plan.

Background

10. The appeal site is subject to a number of planning applications and appeals, including some other LDCs and it is useful to set out some of the most

pertinent history. Much of the history is not disputed between the main parties. It is also relevant to consider an area of land broader than the current appeal site in order to assess significance of various decisions as well as the planning unit for the present case.

1990s

11. Planning permission was given in 1991 for an area of land to the south of the current appeal site (*ref 91/01031/COU, part of Field 4*) for "use of land as site for touring caravans". The planning conditions attached to that planning permission included a restriction that the site shall be used solely for "touring caravans and camping" (condition 2) and another restricting use to only between "Easter and 30th September in each calendar year" (condition 3).
12. A submission in 1993 (*ref 93/01485/FUL*) relating again to land within Field 4, sought the "removal of condition 3" of 91/1031 and was approved with a condition stating that "no touring caravan shall remain on site for more than three months in any one calendar year".
13. Permission (*ref 93/02752/FUL*) again relating to part of Field 4, was then given for the variation of condition 2 of 93/1485 and a new condition No 2, was imposed stating that "other than during the period from 1 April to 30 September, no caravan shall remain on the licensed site for a period in excess of one month."
14. Permission was then approved (*ref 96/02562/COU*) for "Change of use of land to form part of caravan park and removal of Condition 7 of 91/1031/15/4 relating to the restricting of numbers." The application site covered a sub-area of field 4. This was approved with a number of conditions including No 2 stating "the site shall be used for touring caravans and camping and for no other use without prior permission" and No 3 "other than during the period from 1 April to 30 September, no caravan shall remain on the licensed site for a period in excess of one month."

2000s

15. In 2018, an application for planning permission (*ref 18/00889/FUL*) sought the use of land for the "siting of 8 holiday lodges (caravans) with associated works and decking, access, parking and sewage treatment plant". This relates to an area to west of Field 4. It was approved with conditions including (No 3) stating that the lodges shall be for "holiday purposes only and for no more than 4 consecutive weeks". Little emphasis was given to this permission which was approved on 19 November 2018 with a standard time limiting condition stating that it should be begun within 3 years. The appellants refer to "holiday statics (not yet installed)" and consider that this permission extant but I heard no evidence about that.
16. In 2019, an application for an LDC was submitted (*ref 19/01975/CLDE – 'the 2019 LDC'*) which relates to the land incorporating Fields 1, 2 and 3. The LDC was granted which confirmed "the use of the site as recreational and amenity areas ancillary to Ross Park Caravan Park".
17. Another LDC was then granted in 2020 (*ref 20/00445/CLDP – 'the 2020 LDC'*) relating to the middle of the northern fields, Field 2. The LDC was given for the "proposed use of land for stationing of up to 40 caravans". Within the reason for granting the LDC, the decision notice states: "*Planning permission exists for*

the use of the land edged in blue on the plan attached to this Certificate as a holiday caravan site;...” (Field 4) “.. a Certificate of Lawfulness was granted which included the area edged in red on the plan,...” (Field 2) “... as a leisure field ancillary to the Caravan Park, in effect incorporates this area of land into the Caravan Park, thereby forming one planning unit. The number of caravans proposed to be sited in this area is not considered to intensify the use or change the character of the site such that a material change of use will have occurred.”

18. A LDC was also issued following an appeal in 2022, which related to the part of Field 4 which is used for touring caravan pitches (ref APP/P1133/X/21/3288187 ‘the 2022 LDC’). The description of what was sought is “the existing use of the land for the siting of caravans without complying with condition 2 of planning permission 93/2752/15/3 and condition 3 of planning permission 96/2562/15/4.” The Inspector’s reason for issuing the LDC was due to the conditions having been breached for 10 years or more and that they were therefore immune from enforcement action.
19. There have been other applications to the Council. There is also an appeal which is awaiting determination for “for siting of touring caravans sited throughout the year and used as main place of residence.” That appeal relates to the touring caravan area which is a part of Field 4.

Existing primary lawful use of the appeal site

20. The above planning history along with other evidence including that given to the inquiry enables some conclusions to be drawn about the lawful primary use of the appeal site. That is my starting point for considering what is proposed.
21. There is no dispute that field 4 is where, in 1991, the caravan site was started following the approval as a touring caravan site. That caravan site appears to have evolved including by the incorporation of other adjoining land although it was at that time only a site for touring caravans and for camping.
22. The 2019 LDC is significant in that it confirms that by the date of that application, fields 1, 2 and 3 were collectively used as “recreational and amenity areas” stating that this was “ancillary” to the caravan park.
23. The 2020 LDC confirms that the stationing of an additional 40 caravans would not be a material change of use as field 2 is part of the holiday caravan site. This did not specifically refer to any particular type of caravan (hence my reference in the preliminary matters to the description of the current proposal).
24. There is no dispute that static units as proposed in the present case fall within the statutory definition of caravans¹. “Caravan” within the definition of the 1960 Act means any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer) and any motor vehicle so designed or adapted. The 1968 Act provides further definition of the maximum size for twin-units which gives the only size limitation for caravans.
25. These LDCs are significant for what they confirm was considered lawful at those points in time based upon the evidence submitted at that time. Section 191(6) (for existing use or development) and s192(4) (for proposed use or

¹ s29 Caravan Sites and Control of Development Act 1960 and s13 Caravan Sites Act 1968

development) of the Act state that the lawfulness of any use, operations or other matter for which a certificate is in force under this section shall "conclusively be presumed". This is consistent with the Breckland² legal authority, and others, that have been referred to me.

26. I will return to the concept of 'planning unit' again below, but from these documents I consider that it can be conclusively presumed that the whole of the Ross Park site including fields 1, 2, 3 and 4 were, as at the time of the 2020 LDC a single planning unit in use as a holiday caravan site, that being the primary use and with ancillary activities taking place across that unit.

Terms of this appeal

27. Some static units have already been positioned within field 2 and are occupied as permanent park-homes and not on a holiday occupancy basis. Whether or not that has involved a material change of use already or any other breach of planning control has occurred, is not before me.
28. As I set out above in the preliminary matters, the description of the existing use of the site as set out on the application form and decision notice refers to 40 "static" caravans. However, it would be fairer to refer to the existing use of the site, as being for 110 touring and 40 caravans. I drew attention to this when Mr Rudd was cross-examining Mr Crawford.
29. The layout of the static caravans within field 2 that I saw is however similar to that shown only in 2 dimensions on the 'Proposed Phase II Sketch Layout' (referred to in submissions as the 'block plan') submitted with the refused application. It appears that a substantial amount of ground works have taken place to enable this in terms of levelling, laying of hardsurfaces for the static units as well as vehicle parking and also the laying of the internal road which are not apparent just from that plan.
30. It is proposed in this case for 40 static units to be positioned within field 2. In addition, 9 static units are shown on the block plan to be positioned within field 3 and 6 within field 1. There is no request for confirmation of the lawfulness of any specific type of occupation of those caravans. I am therefore considering whether they would be lawful if occupied within the scope of the use of the land as a holiday caravan site.

Planning unit

31. Given the terms of the 2020 LDC, it can be presumed that the lawful primary use of the land is as a holiday caravan site. Although that LDC included field 2 and field 4, given the context of the previous 2019 LDC, it clearly relies upon use of fields 1, 2, 3 and 4. All of the fields are within the same freehold ownership.
32. At the entrance to the 'static' units in field 2 there have been signs erected stating "Private Area – Access for residents of Haytor View only". Haytor View is the name of what has started to become the permanent residents' area. However, the occupants of that site still have to gain access via the main site entrance and drive through field 4 where touring caravans, camping and caravan storage takes place. The residents of the static units also still have

² Breckland DC v SSHLG & Plum Tree Country Park [2020] EWHC 292 (Admin)

access to the amenity and entertainment areas which are an integral part of the site as a holiday park.

33. Previously, as an amenity area, field 2 would have been accessible by people staying anywhere on the site. They would also have been able to access other amenity areas for instance in field 1 by walking through field 2. There is no physical barrier to them doing so now but the signage and the clearly more private appearance of the area now laid out for the small number of statics in field 2 that have already been positioned, provides a more unfriendly context for people other than those staying or specifically visiting people living in the static units. This in my view makes it less likely to be an area that holiday makers would walk or drive through. There remain other ways in which all of the site can be accessed by any of the occupants staying anywhere within it.
34. Another entrance has been created to the western part of the site onto Moor Road which Mr Eiser stated had been used for construction traffic in laying out the static units within field 2. That entrance has large timber gates that were closed when I visited and it accesses field 5 which is not part of the application site. Confusingly field 5 is shown as owned by the applicants in the 2019 LDC but not the 2020 LDC. Whether or not there is an intention to use that entrance in the future for any residents on the site, I have no evidence that it has been or was used for occupants of the existing static units in field by the date of the application. The rough, hard-core covering of field 5, does not suggest to me that it has been used to any significant extent by occupants or visitors to the existing static units or that it is conducive to such use or use by occupants of the wider site. Similarly, part of field 1 has a rough, informal surface rather than the more manicured, well-maintained appearance of the areas where there is more activity. The few static units in field 2 are currently let to their occupants with the appellant company owning the freehold.
35. Fields 1, 2, 3 and 4 are in single ownership and freehold occupation and are not physically or functionally separated from one another. They therefore comprise, as a matter of fact and degree, a single planning unit.

Whether a material change in the use is proposed

36. Mr Rudd spent some time in cross-examining Mr Crawford about the terms of the 2020 LDC and the lack of reference to holiday use within what had been applied for at that time. It seemed to me that Mr Rudd was suggesting that if there had been any ambiguity with the 2020 LDC, that could be appropriate to look behind at the application documents. I do not consider, however, that there is any ambiguity with the 2020 LDC as its terms are clearly set out and I have quoted them above.
37. The 55 static caravans now proposed would be positioned on land which was formally certified by the 2019 LDC as recreation and amenity land. The stationing of caravans on land is not in itself development within the meaning of s55 of the Act and it is the purpose of the caravans which relates to what use the land is being put to that is relevant to consider. The purpose of the caravans is for people to occupy them with no type of occupation specified.
38. I have been referred to the Cotswold Grange³ authority in support of the appellant's case. That case related to a grant of planning permission where the

³ Cotswold Grange Country Park LLP v SSCLG & Tewkesbury DC [2014] EWHC 1138 (Admin); [2014] JPL 981

description of the number of caravans was insufficient to control those numbers in the absence of a condition to that effect. I accept that point and that an application for a LDC can be viewed in a similar manner as a planning permission. In this case, there are no limitations over the number of caravans that can be positioned on the site overall. I also accept that the description in the previous planning history including the LDCs identifies what can be done, what is permitted rather than the alternative of a planning condition which can identify what cannot be done.

39. The appellant also refers to the Breckland judgement in stating that changing the type of caravan amongst other things would not amount to development on a caravan site. In the present case, there is no proposed change in type of caravan from touring to static or a change in the type of occupation proposed, The change in this case would be from ancillary activities in the form recreational and general amenity areas to the positioning of static caravans.
40. In this case, the 2020 LDC describes the use as holiday caravan site but does not qualify that as being only, for example, for touring caravans or for seasonal occupancy but does include a limitation of up to 40 units. The caravan site was established in 1991. The planning permission relating to part of field 4 explicitly, by way of planning conditions, limited the use for touring caravans and camping. The 2019 LDC described the certified use of fields 1, 2 and 3 as recreational and amenity areas. These are therefore functional limitations which define the way in which the use has been operated and the way it is lawful to operate it.
41. In the absence of any functional limitation regarding the type of caravans that have already been certified as being lawful within field 2 via the 2020 LDC, I accept that there is no absolute control over this. With reference to the Hertfordshire⁴ judgment, the change proposed would only result in a material change of the use of the land if it brought about a definable change in the character of the use.
42. The 2020 LDC certified 40 caravans and not 40 static caravans. Both parties had started to assume otherwise. Given this, it is clearer to me that I have to consider whether 55 static caravans would be lawful rather than just the 15 additional caravans.
43. I have set out above my logic for considering that the single planning unit can lawfully be used as a caravan site along with ancillary activities which are undertaken in open areas across the site as well as within buildings. That caravan site has been established on the basis of holiday use. I saw that the large part of the central part of the site within field 4 has an open, communal and informal feel. The touring pitches are separated by informal yet substantial, mature planting including some large trees. The surfacing of the pitches in the most part are informally covered in gravel although the circulatory road is hard-surfaced. There is a variety to the type of caravans and also motor-homes that I saw positioned within field 4.
44. The main open-space recreational area within field 3 is also characterised by an informality with the landscaping not being regimented. It is clearly subject to ongoing maintenance with the grass being kept cut and tidy. Other areas such as within the western part of the appeal site, also have areas of substantial

⁴ Hertfordshire CC v SSCLG & Metal and Waste Recycling Ltd [2012] EWCA Civ 1473; [2013] JPL 560

- hedge planting. I was visiting towards the end of the summer, on a sunny day and the site at that time had a very verdant character.
45. The static units that have already been positioned within field 2 along with the layout of the pitches that are not yet occupied, at the moment contrast substantially with this verdant, informal character of other parts of the site. I have little evidence about what this area looked like before the current redevelopment took place although some aerial photographs have been provided. I am mindful that the landscaping that I saw between the new pitches is recently planted, that it will grow if left to do so and that the site may well 'green-up' as well. Those units that have been positioned on the site already are, it is not disputed by the appellant, occupied on a residential basis and that appears to have resulted in a number of items being placed around them such as large domestic wheely-bins and also more permanent features such as small sheds, stores and other domestic paraphernalia.
46. Caravans come in various shapes and sizes and the statutory definitions provide maximum limitations. In my experience, touring caravans can be very large but generally speaking are brought onto site by a vehicle or sometimes stored and brought out onto their respective pitches by site staff. Static units generally speaking have a greater degree of permanence than touring caravans. They arrive on site at one time on specialist vehicles and stay in position. Touring units are generally ephemeral. The difference in type of caravan may also alter the make-up of the traffic to and from the site. It seems logical that static units may cause less vehicle related implications for roads within and outside of the site. People driving to stay in a static caravan are less likely to be towing anything behind them, for example.
47. The physical presence continuously of the 40 static units would have more of a constant visual impact, particularly at close quarters, even when they are not occupied. It was agreed however by the Council in the inquiry that there are no strict seasonal limitations. A holiday caravan is most likely to be occupied during the holiday seasons. This can vary according to the personal circumstances of visitors, how the site is managed as well as weather conditions.
48. When the Council accepted that the stationing of up to 40 caravans in field 2 would not require planning permission, I must assume however that they took into account that 40 caravan pitches for any type of caravan would have had similar impacts upon the character of this field and through off site impacts. They confirm on the face of that LDC that it would not intensify the use or change the character of the site. Many of the changes to the characteristics of the holiday caravan site would be expected whether they have occurred due to 40 touring caravans being stationed and used on field 2 or whether they are 40 static caravans, or even a mix of types.
49. With respect to the remaining 15 static units proposed, the crucial test established from Sage⁵ is whether there would be a change in character of the use, in this case, to expand the number of static caravans from 40 to 55. The environmental impact can be relevant as evidence of a material change of use due to an intensification and this is a matter of fact and degree. Childs⁶ also related to a caravan site for 4 caravans that had been confirmed as lawful via a

⁵ Sage v SSHCLG & LB of Bromley [2021] EWHC 2885 (Admin)

⁶ R (oao Childs) v FSS & Test Valley BC [2005] EWHC 2368 (Admin)

s192 LDC. A Planning Inspector's conclusion that 8 caravans would be a material change in the character of the use, taking into account the impact on the immediate surroundings was, the court decided, a decision they were entitled to make.

50. I describe field 3 above. It is a large area with some open grassland and which has a wooded feel. This is therefore a pleasant informal area which is used for dog walking and for general open recreation. It adjoins a shelter that includes a dog shower and also a place for emptying chemical toilets. Around the western and southern parts of this field, 9 static units are proposed, being shown on the submitted block plan in a more spacious, informal manner than those within field 2.
51. Field 1 is largely split into 2 separate parcels by a substantial row of trees. These separate out what is shown as a "conservation and amenity field" on the submitted block plan and which had a patchy covering of rough grass when I visited. On the eastern side of the line of trees is a narrower strip of land which at the time of my visit had a rough surface with various equipment and items informally stored on it including a shipping container and a portable unit. The block plan shows a row of 6 static units within this eastern part of field 1.
52. These additional caravans would result in some more traffic movements, more people on the site using the facilities. The 9 static units in field 3 would be informally laid out if the block plan is adhered to with room for grass and landscaping in-between. There would be space for residents at the site to continue to walk their dogs, possibly play ball games and other recreational activities requiring an open space. Those units proposed in field 1 are shown to be more formally laid out. All of the additional 15 static units would also have a visual effect upon those fields but this would be very limited and localised in impact in my view. However, in both instances, the use of the fields for recreation and general amenity by all occupants on the site would still be possible. Although use of field 2 for anything other than the positioning of those 40 static caravans would be very limited, that would be the case whether the caravans installed are static units or touring caravans.
53. As a matter of fact and degree, I therefore consider that the proposed 55 static caravans would not cause a material change in the definable character of the land if occupied for holiday purposes on the holiday caravan site. As such, use of the site overall for 110 touring and 55 static caravans would not involve a material change of use of the appeal site and would be lawful.

Conclusion

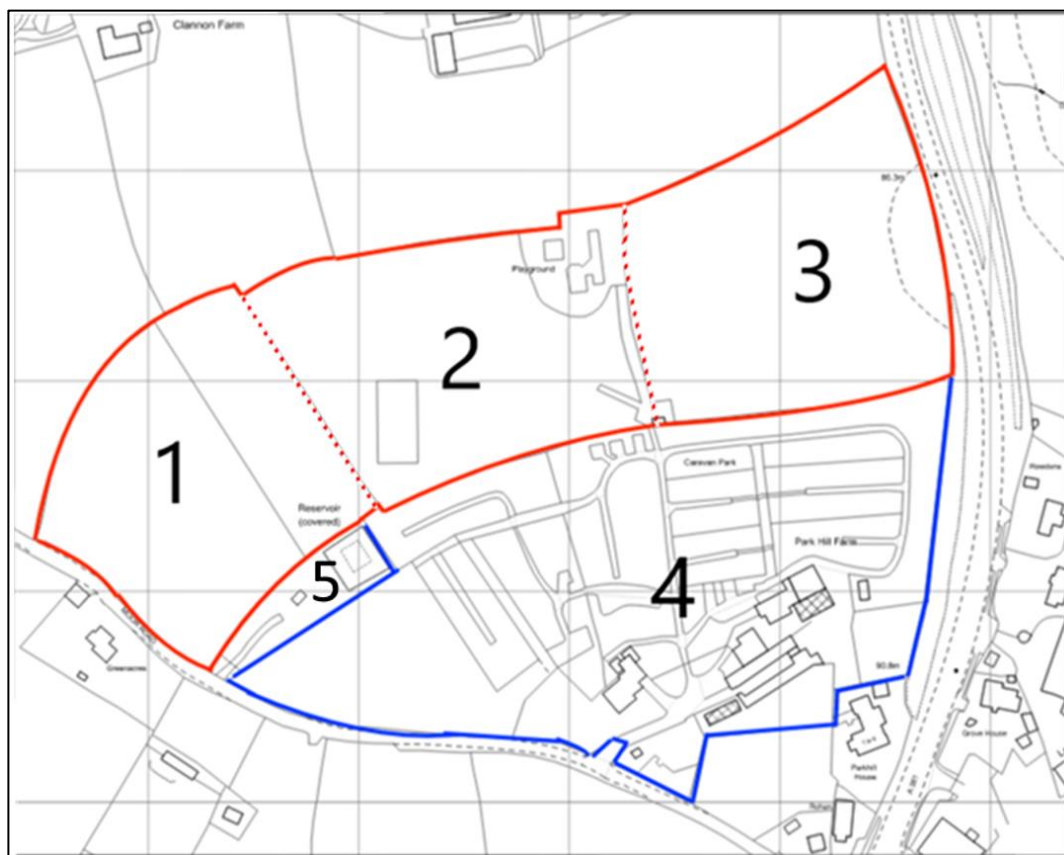
54. For the reasons given above I conclude that the Council's refusal to grant a certificate of lawful use or development in respect to alteration to part of caravan site to alter the existing use of caravan site with 110 touring and 40 static caravans, amenity areas and ancillary facilities to a caravan site with 110 touring and 55 static caravans, amenity areas and ancillary facilities' would be lawful, was not well founded and that the appeal should succeed. I will exercise accordingly the powers transferred to me in section 195(3) of the 1990 Act as amended.

Andy Harwood

INSPECTOR

Appendix: Land ownership Plan

Extracted from the draft Statement of Common Ground



APPEARANCES

FOR THE APPELLANT:

Mr Rudd of Counsel

They called:

Mr Eiser Planning consultant

FOR THE LOCAL PLANNING AUTHORITY:

Mr Ward of Counsel

They called:

Mr Crawford Planning officer

INTERESTED PARTIES:

None who gave evidence

Lawful Development Certificate

TOWN AND COUNTRY PLANNING ACT 1990: SECTION 192
(as amended by Section 10 of the Planning and Compensation Act 1991)

TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND)
ORDER 2015: ARTICLE 39

IT IS HEREBY CERTIFIED that on 23 January 2023 the use described in the First Schedule hereto in respect of the land specified in the Second Schedule hereto and edged in red on the plan attached to this certificate, would have been lawful within the meaning of section 191 of the Town and Country Planning Act 1990 (as amended), for the following reason:

The proposed 55 static caravans within the appeal site as shown on 'plan 2' attached herewith, when occupied for holiday purposes consistent with the use of the land as a holiday caravan site (as outlined both in red and blue on 'plan 1') along with up to 110 touring caravans, amenity areas and ancillary facilities, would not involve a material change in the definable character of the land. As such, the proposal as specified would not therefore involve a material change of use of the holiday caravan site overall.

For the avoidance of doubt, 'plan 2' shows some land that is outside of the planning unit considered for the purposes of this certificate. The holiday caravan site as a whole is shown outlined both in red and blue on 'plan 1' as attached.

Signed

Andy Harwood

Inspector

Date: 6 October 2023

Reference: APP/P1133/X/23/3320991

First Schedule

Alteration to part of caravan site to alter the existing use of caravan site with 110 touring and 40 static caravans, amenity areas and ancillary facilities to a caravan site with 110 touring and 55 static caravans, amenity areas and ancillary facilities.

Second Schedule

Land at Park Hill Caravan Park, Moor Road, Ipplepen, Newton Abbot TQ12 5TT

IMPORTANT NOTES – SEE OVER

NOTES

This certificate is issued solely for the purpose of Section 192 of the Town and Country Planning Act 1990 (as amended).

It certifies that the use /operations described in the First Schedule taking place on the land specified in the Second Schedule would have been lawful, on the certified date and, thus, was /were not liable to enforcement action, under section 172 of the 1990 Act, on that date.

This certificate applies only to the extent of the use /operations described in the First Schedule and to the land specified in the Second Schedule and identified on the attached plan. Any use /operation which is materially different from that described, or which relates to any other land, may result in a breach of planning control which is liable to enforcement action by the local planning authority.

The effect of the certificate is subject to the provisions in section 192(4) of the 1990 Act, as amended, which state that the lawfulness of a specified use or operation is only conclusively presumed where there has been no material change, before the use is instituted or the operations begun, in any of the matters which were relevant to the decision about lawfulness.

Plan 1

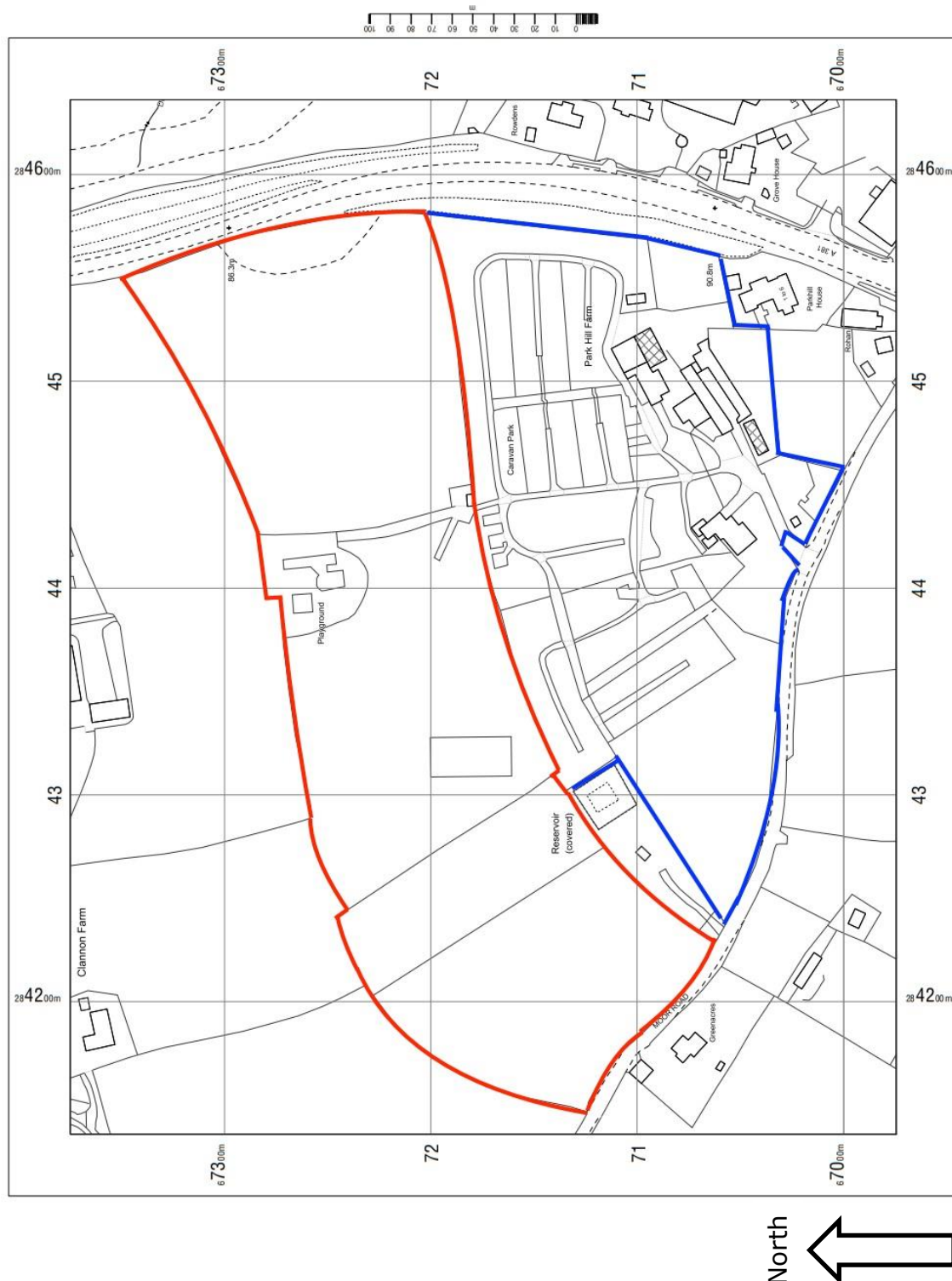
This is the plan referred to in the Lawful Development Certificate dated: 6 October 2023

by **Andy Harwood CMS MSc MRTPI**

**Land at: Land at Park Hill Caravan Park, Moor Road, Ipplepen,
Newton Abbot TQ12 5TT**

Reference: APP/P1133/X/23/3320991

Scale: Not to Scale



Plan 2

This is the plan referred to in the Lawful Development Certificate dated: 6 October 2023

by **Andy Harwood CMS MSc MRTPI**

**Land at: Land at Park Hill Caravan Park, Moor Road, Ipplepen,
Newton Abbot TQ12 5TT**

Reference: APP/P1133/X/23/3320991

Scale: Not to Scale

