



The countryside charity
North and East Yorkshire

PO Box 189
York
YO7 9BL

www.cpreney.org.uk

Tel: 07983 088120
Email: info@cpreney.org.uk

Branch Chair
Mrs Jan Arger

Authority: Yorkshire Dales National Park Authority

Type of consultation: Planning Consultation

Full details of application/consultation: R/54/7X - Full planning permission for siting of 17 glamping pods comprising - (Area A) relocation of petting farm and siting of 11 glamping pods and associated development; and (Area B) removal of 2 holiday lodges, siting of 6 glamping pods and associated works

At land at: Aysgarth Lodge Holidays, Westholme Bank, Aysgarth, DL8 3SP

Type of response: Objection

Date of Submission: 18th April 2022

Please note, CPRE North Yorkshire has merged with CPRE East Yorkshire, please update your contact details to the correct email address on your databases as set out above. The registered postal address and phone number for the charity remain as previously for CPRE North Yorkshire.

All responses or queries relating to this submission should be directed to the Secretary for the Trustees at the contact details shown above on this frontispiece.

All CPRE North and East Yorkshire comments are prepared by the charity using professional planners whose research and recommendations form the basis of this response in line with national CPRE policies.

External planning consultant used in this response:



KVA Planning Consultancy
Katie Atkinson, BA (Hons), Dip TP, MA
MRTPI
www.kvapanning.co.uk

Comment

CPRE North and East Yorkshire ('CPRENEY') welcomes the opportunity to comment on this detailed application for 17 new glamping pods, the relocation of petting farm and removal of 2 holiday lodges and associated works, at land at Aysgarth Lodge Holidays, Westholme Bank, Aysgarth, submitted to the Yorkshire Dales National Park Authority ('the NPA') on behalf of Leisure Resorts Ltd ('the applicant').

The applicant proposes two areas of development within the existing holiday lodge site. Area A is located to the west of the existing park and currently consists of the park entrance and access road, office/reception building, parking area, open space and play area and petting farm. The area comprises approximately 1.08Ha however, the proposed developable area is circa 0.53Ha due to the topography of the land sloping away to the south of the main entrance. It is proposed to insert 11 'hobbit holes' into the hillside in a semi-submerged position. Land excavated for the creation of the hole will be placed around and over the hobbit pod and planted to create the appearance of a 'hummocky wildflower meadow' when viewed from Westholme Bank. Each pod is to have a small outdoor seating area and a 2.5m path for access. The existing petting farm will be relocated to the south of the access track. The existing parking area will be extended to provide 18 spaces of communal parking for Area A and new footways will be provided to enable pedestrian access to each pod. These proposed developments will require the removal of 3 trees.

Area B is located at the north-western boundary of the existing holiday park and extends to 0.21Ha. It currently comprises the existing access route and two existing holiday lodges at the highest part of the plateau. It is bounded by existing holiday development to the east, south and west with undeveloped grass fields to the north. The proposed development would include the removal of the two existing lodges in this location and siting of 6 new glamping pods to be sited on concrete bases adjacent to the existing internal roadway. 8 trees would be required to be felled to allow the development to occur.

The applicant sets out that the site is in Flood Zone 1 of the Environment Agency's Flood Risk Maps however, as the proposal extends beyond 1Ha a Flood Risk Assessment ('FRA') is required to be submitted with the proposals. The applicant's FRA submitted in support of the proposals is limited in scope and does not provide information setting out where soakaways/filtration trenches will be located or constructed to deal with run-off from the increased area of impermeable surfaces as a result of the proposal amounting to 950.55m² (gross) across the site. The calculation within the applicant's FRA shows a 668m² total at paragraph 6.5.11, which when calculating the total increase of impermeable surfaces across both Area A and Area B appears to be incorrect as the total net increase is 781.55m² (when factoring in the existing area of impermeable bases associated with the removal of the existing 2x holiday lodges).

Furthermore, no details have been submitted in support of the proposals setting out how the risk of pollution to surface/ground water has been mitigated by showing how surface water run-off from construction or other activities as well as from foul sewage will be disposed of. Differing information has been presented in the Planning, Design and Access Statement ('PDAS') and the application form in relation to sewage discharges. A drainage plan has not been provided illustrating the location, capacity or design of a treatment system either new or existing or how and when they will be emptied. It is necessary to ensure that whatever system is used it is capable of taking waste from the existing and proposed site or whether additional measures are required. This is especially important given the proximity of the site to Bishopdale Beck, eventually joining the River Ure, and recent evidence highlighting the number of pollution and sewage discharge events into North Yorkshire's waterways.

Paragraph 174 of the National Planning Policy Framework ('NPPF') states planning should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of

water pollution, amongst other things. Policy SP4 of the Yorkshire Dales National Park Local Plan ('LP') reaffirms this position. Therefore, CPRENEY feel the proposal should be refused as being contrary to policy.

There does not appear to be any information submitted to detail what the more traditional glamping pods in Area B will be constructed from or a detailed elevational drawing to show what these may look like in the landscape on the highest part of the Park, or where the Indian stone outdoor seating area will be located adjacent to the hobbit hole pods in Area A. The 'design' element of the proposals is very vague and therefore, it is not apparent whether this will be in-keeping with the surrounding environment – particularly in Area A which seems to have been designed to ensure minimal impact on the hillside.

Members of the public can traverse through the site (Area A) following a right of way (PROW no: 20.83/13/1) along the north bank of the Bishopdale Beck along the south-eastern boundary of the site. The nearest proposed pod would be within 75m of the path and 45m from the extended parking area and relocated petting farm. The path follows the Beck through the existing park but by developing this western area of the site it is introducing development into a much wider part of the countryside and the National Park.

Whilst the holiday park is already in existence, the introduction of development in Area A will alter the character of the landscape, despite the pods being located within the hillside and covered with earth. The potential for the seating area and furniture alongside human activity associated with the proposal will alter the character of this part of the site and overall landscape. Paragraph 176 of the NPPF places great weight on '*conserving and enhancing the landscape and scenic beauty of National Parks which have the highest status of protection in relation to these issues.*' It goes on to say, '*the scale and extent of development within all these designated areas should be limited.*' As such the applicant does not provide any evidence as to what this will actually look like on the ground and it does not appear to have been assessed as part of the applicant's Landscape and Visual Impact Assessment ('LVIA') in both landscape and visual terms from the wider landscape setting to users of the footpath, rather, just an assessment of the hobbit hole entrance.

The application documents also do not evidence a lighting assessment or provide a lighting plan, nor has this been seemingly assessed in the applicants LVIA. No consideration appears to have been given to whether the new developments will be lit or positioned to avoid light spill. It is assumed that if the new proposed Areas are intended for use over a 12-month period (as per the 2010 permission on the rest of the site), lighting will be required along footpaths for safety at the very least and presumably in Area A given the downward slope of the land that the hobbit holes will be constructed within. Members of the charity have contacted CPRENEY to detail concerns regarding light spill from the existing positioning of lodges and lack of provision of landscaping which was conditioned to mitigate light pollution via a previous planning permission and as such, this application causes concern.

The Yorkshire Dales National Park was designated as an International Dark Skies Reserve, in 2020 and CPRENEY were supportive of the bid. The National Park was designated in 1954 (and extended into Cumbria and Lancashire in 2016) in recognition of its extraordinary natural beauty, the diversity of its wildlife habitats, its rich cultural heritage and its fantastic opportunities for outdoor recreation. One of the special qualities of the National Park was its Dark Night Skies '*as it suffers little from light pollution, the moon, night sky and atmospheric effects can be fully appreciated*' (appendix 2 Local Plan 2015-2030), therefore, it has always been recognised for such skies. As part of the recent designation, a Yorkshire Dales, Lighting Management Plan has been created which designates a core area. The proposed site is just outside the core area, however, table 2.6 clearly states that '*the remainder of the National Park makes up the buffer zone*' the supporting text to this explaining that there is a general '*recommendation that all Core Zones require an area of protection surrounding the very strict limit of no, or very little, artificial light with one of less severe limitations*' and goes on to state that '*the remainder of the Park is a general Buffer Zone limit of many miles distant round the core zone.*'

CPRENEY consider that the impact of lighting is a material consideration that has not been taken into account by the applicant. The reserve designation was granted following the development of the existing holiday park, however, just because the site exists, does not mean that it will necessarily be appropriate to extend the park further into the buffer zone which may impact the Core Area. Without a lighting assessment – of the proposed extension and cumulatively with the existing site, it is impossible to determine that the proposals will not detrimentally impact on the surrounding environment and special qualities of the National Park. As such, it is considered the proposal is contrary to NPPF paragraph 176 and 185d which seeks to *'limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.'* Furthermore, the proposal appears to be contrary to Local Plan policy SP1f and SP2 which both specifically relate to the enhancement, protection, and enjoyment of the special qualities of the National Park. Policy SP4 specifically details the requirement to safeguard *'the darkness of the night sky'*. As such, CPRENEY believe the proposal should be refused.

The applicant proposes to fell 11 trees across the site to allow the proposals to occur, however, do not seem to have offered any areas of the site for compensatory planting.

Local Plan Policy T3 deals specifically with sustainable self-catering visitor accommodation. Within section 7 of the PDAS, the applicant sets out that the applicant is intending to provide a new wildflower meadow (in and around the hobbit holes), provision of electric vehicles charging points and an extension to existing waste recycling facilities. No information has been provided elsewhere in the application documents to support this, bar the wildflower meadow. There does not appear to have been consideration given to the provision of energy saving technologies or use of renewable energy. CPRENEY are thus concerned that the applicant is providing lip service to this element of the policy. Equally, what measures are to be put in place should the wildflower meadow not succeed due to human activities on the site? Furthermore, whilst the policy provides some support for the siting of glamping type units it states clearly that this will only be permitted where *'the site is capable of such a change without a harmful impact on the special qualities of the National Park.'* As set out above, it is not considered sufficient information has been provided to assure the NPA that the special qualities will not be impacted detrimentally.

In conclusion, CPRENEY do not object to appropriately sited and well-designed holiday accommodation sites per se, however, in this case, it is considered that there has not been sufficient evidence to rule out detrimental harm to the designated landscape, waterways and International Dark Sky Reserve. As such, CPRENEY would urge the NPA to refuse the proposal in its current guise as being contrary to several national and local planning policies.

CPRENEY reserve the right to comment further should additional information be submitted in support of the proposals.