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Branch Chair
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Authority: North York Moors National Park Authority

Type of consultation: Planning Consultation

Full details of application/consultation: 22/2022/0568 – application for reorganization of northern section of the existing caravan site to allow for 48 lodges (increase of seven) and associated access arrangement together with southwestern extension to site to allow for the siting of 27 static caravans in lieu of ten static caravans and five camping pods

At land: Lady Cross Plantation Caravan Park, Egton, YO21 1UA

Type of response: Comment

Date of Submission: 8th August 2022

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:



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Comment

CPRE North and East Yorkshire ('CPRENEY') welcomes the opportunity to comment on this application for full planning permission relating to tourism accommodation at an existing holiday park at Egton. The site consists of 95 acres and is located mostly within mature woodland within the National Park ('NP'). The application was submitted to North York Moors National Park Authority ('the NPA') on behalf of Mr Robinson the landowner and applicant ('the applicant') by Lambe Planning and Design.

The Ladycross Plantation Holiday Park is a family-owned rural enterprise, and the current proposals relates to three different elements which involve the restructuring of existing and previously approved layouts to 'enhance and diversify' the existing holiday accommodation offer at the holiday park. In summary, the three elements consist of:

1. Holiday lodges – Currently 41 holiday lodges permitted within the site (12 implemented), proposal to restructure the site within the extant approved holiday park and to increase the overall number of units to 48 (increase of seven) within the same approved footprint.
2. Holiday Caravans – Currently has consent for 10 static caravans and 5 pods, proposal to restructure and relocate existing pitches alongside an increase of 12 units to total 27 units.
3. New Highway Access – to create a new and second access to Egton Road (A171).

Having had the opportunity to consider the additional documents submitted on behalf of the applicant, CPRENEY neither support nor object to the proposals per se, however, do have some comments to make which they hope will be taken into account in the determination process.

The NPA Local Plan was adopted in July 2020 and Strategic Policy J deals specifically with tourism and recreation. It seeks to encourage appropriate tourism development within the NP that is sensitively located and will not detract from the special qualities of the NP. Policy UE1 recognises that existing tourism businesses in the open countryside may wish to expand but requires any new development to be subservient in scale of the existing development. It also clearly sets out that the proposal must comply with Policy UE2 - camping, glamping, caravans, and cabins which seeks to protect the landscape character of the NP by supporting small scale development proposals which are screened by existing topography, buildings or adequate well-established vegetation within the applicant's control. Further, the policy specifically sets out that proposals for *'conversion of existing camping or caravanning sites to statics will not be permitted. Exceptions will be considered where the proposal will reduce the visual impact of the site in the wider landscape.'*

The supporting text sets out at paragraph 5.14 that the policy *'does not allow for the provision of new static sites except where the sites are being remodeled in order to bring about environmental improvement.'* The site in question is an existing holiday site and is for an expansion of static caravans, therefore technically there is no policy support for that. However, turning to the latter part of the quoted policy above – exceptions will be made where visual impact is reduced. The site is currently well screened within existing mature woodland and the two areas to be restructured will remain screened from external viewpoints. It is therefore acknowledged that as a result, there may not be any reduction in visual impact of the site in the wider landscape and thus the significance of the proposal on that wider landscape is negligible.

However, the site is certainly not 'small scale' which the LP defines as being *'no more than 12 units'* and when considered cumulatively with any existing development (paragraph 5.12), the wider site permits circa amenity buildings, The proposal is to remodel the site and increase the number of units across the site by 19. The wider site is consented for a mix of camping pods, motorhomes, lodges, statics and tourers, therefore the current proposal does not supplant one particular type of accommodation, ensuring that the NP retains a valued offer. It is understood that the specific sites subject to these proposals are already consented for this

type of development and as such the principal usage is established with the same footprint being utilised. From this aspect CPRENEY has no objection.

However, the loss of mature trees to facilitate the two proposals is a concern, especially when other parts of the NP are to be re-planted and to become part of the Northern Forest to assist in the mitigation of the climate emergency, alongside the added benefits to biodiversity. It is understood from the application documents that the applicant has relocated the units further 'inside' the wooded areas to ensure that the units remain hidden as a result of pre-application advice which is welcomed. However, it is also understood that the site has a long history of planning applications including several 'remodeling' operations. CPRENEY consider that the whole site is large, and whilst self-contained and visually unintrusive at present, would not wish for the site to get any larger or eat away further at the woodland areas in line with policy ENV1 of the LP.

CPRENEY are also concerned about the applicants submitted biodiversity matrix assessment. Paragraph 174d of the National Planning Policy Framework ('NPPF') states clearly that planning decisions should provide '*net gains for biodiversity.*' The adopted LP also requires developments to '*not cause a detrimental impact on our habitats and wildlife*', i.e., no net loss to biodiversity, including Strategic Policy A - Strategic Policy E Strategic Policy H – which requires all developments to '*maximise opportunities to strengthen the integrity and resilience of habitats and species within the national Park and provide a net gain in biodiversity; [...]*'. The applicant's Biodiversity Net Gain ('BNG') calculation appears to show a 20.36% loss in biodiversity due to the proposed development when taking off-site compensation into account (without off-site provision the actual figure is shown to be a loss of 52.20%). CPRENEY does not believe that the proposed off-site provision is acceptable in this instance as no explanatory information has been submitted with the BNG calculations to explain the how these results have been reached or are indeed justified. Furthermore, no management plan has been submitted to ensure the delivery and management of enhanced habitats over a 30-year period as required by the Environment Act and in line with paragraph 4.27 of the LP which states '*agreed mitigation measures may include arrangements for the long-term management of biodiversity enhancements which would be secured through a planning condition.*'

Prior to determination, CPRENEY consider that the applicant should provide further information in relation to BNG and a long-term habitat management plan for these specific areas and attempt to consider ways of reducing the onsite loss of biodiversity habitats. Subsequently, it is thought that the applicant should consider a further site-wide habitat management plan which would help formalise arrangements across the whole holiday park and land within the applicant's ownership - in the interests of clarity.

It is understood that the applicant is in control of the woodland and 95acre wider site having planted much of the coniferous woodland himself for recreational purposes. It is hoped that should this proposal be permitted, the NPA would be able to ensure that further expansion or remodeling into other areas of woodland would not be allowed to occur incrementally by placing maximum number of units on the site by way of condition and firmly controlling the red line boundary of the site – the overall size of the site and developed area is potentially schedule 2 development in terms of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and therefore a screening opinion may be required, especially if the site was to expand further.

Finally, CPRENEY acknowledge the need for rural businesses to adapt to current uncertainties and challenging times, however, the special qualities of the designated landscape are required to be preserved and protected, thus take precedence when necessary. CPRENEY reserves the right to comment further should any additional information be submitted in support of the proposal. At this stage we neither object nor support the proposals but consider further information necessary prior to determination in the interests of preserving the special qualities of the National Park.