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Branch Chair  
Mrs Jan Arger

**Authority:** East Riding of Yorkshire Council

**Type of consultation:** Planning Consultation

**Full details of application/consultation:** 22/02551/PLF - Change of use of land for the siting of 12 timber camping pods in connection with existing tourism business

**At land at:** Land East Of Sixpenny Hill Plantation Bempton Lane Flamborough East Riding Of Yorkshire YO15 1AT

**Type of response:** Objection

**Date of Submission:** 13<sup>th</sup> October 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 outline application for the Change of Use of land for the siting of 12 timber camping pods at Six Penny Hill, Flamborough submitted to East Riding of Yorkshire Council ('the Council') by Edwardson Associates on behalf of Angus Wielkopolski ('the applicant').

It is recognised from the documents submitted in support of the proposals that the applicant wishes this development proposal to be considered as an addition to that business and also as a diversification scheme.

The 2.56Hectare site is located within the Yorkshire Wolds, circa 1500m north of Flamborough and for planning purposes is open countryside. The site is not in a designated Conservation Area, however, the site is situated within the Flamborough Headland Heritage Coast.

## Planning Context

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that an application should be determined in accordance with the development plan unless material planning considerations indicate otherwise. The planning system should contribute to achieving sustainable development. The National Planning Policy Framework ('NPPF') (2021) aims to deliver sustainable development through the implementation of its policies. Paragraph 11 states that for decision making this means:

- c) *'approving development proposals that accord with an up-to-date development plan without delay;*  
*or*
- d) *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
  - I. The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
  - II. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'*

Paragraph 219 of the NPPF clarifies that existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of the Framework. Weight should be given to them according to their consistency with the NPPF. (The closer the policies in the plan to the policies in the Framework, the greater the weight that should be attributed).

The Development Plan relevant to this application consists of:

- Strategy Document (adopted April 2016); and
- Allocations Document (adopted July 2016).

It is understood that the Council are in the process of preparing a new Local Plan which will replace a number of existing adopted planning policy documents with a single policy document, with the next draft version being ready for consultation late 2022. As a result of the early stage in plan preparation, no weight can be attributed to the new Local Plan in the determination process and as such, full weight should be given to the saved Local Plan policies and other material considerations as necessary including the NPPF.

CPRENEY fundamentally disagree with the statement in the applicant's Design and Access Statement which

sets out at paragraph 6.1 *'the principle of the proposal is considered to be acceptable and in accordance with national and local Development Plan policies.'* The applicant's document appears to downplay the impact on the Heritage Coast and also the Yorkshire Wolds Important Landscape Area within which the proposed site is located and concentrates solely on the economic support offered through the Development Plan.

It is acknowledged that there is some policy support via the Local Plan Strategy Document ('SD') policy S3 and S4 for small scale tourist accommodation in the open countryside where account has been taken of the need to support sustainable patterns of development, the re-use of previously developed land and does not involve the loss of Best and Most Versatile agricultural land and further support via SD policy EC1 and EC2. However, CPRENEY do not consider that the area is deficient in camping pods or high-quality holiday accommodation in the area. Indeed Flamborough (village) and the Headland has a number of large and successful holiday accommodations including a mix of self-catering cabins, caravans, glamping pods (in Flamborough on Lighthouse Road), holiday cottages, guest houses and small hotels. There is known to be more tourist bed-space provision on the headland alone than there are permanent residents in the locality. Therefore, CPRENEY argue with the applicant's assertion that the area is deficient in mix.

Furthermore, the footprint of the site is 2.56Ha, whilst it is acknowledged that the proposal is for 12 cabins, the site could easily hold more due to the positioning of the units within the site. However, that being said, any development where a site is larger than 1Ha (not pertaining to dwelling houses) is considered to be major development in accordance with section 2, (1) (Major Development - E) of the Town and Country Planning (Development Management Procedure) (England) Order 2010 therefore this is not considered small scale. The NPPF is clear at paragraph 178 that *'major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.'*

The site is located on a sloping topography which whilst relatively well screened is viewed from the Public Footpath which runs along the eastern boundary. This area of countryside adjacent to Flamborough is undeveloped. Given the existing large-scale holiday sites which circumvent the 3 other sides of the settlement, it is considered that this undeveloped location and its wider context is especially important. Allowing 12 camping pods on this large site, would introduce development to the north of Flamborough and render boundaries indefensible for more sites in the future, be it separate sites or within this red line boundary. The undeveloped coastline (which extends inland to this area) should be preserved.

The applicant has located the site away from his other tourism enterprise, does not include the re-use of any other buildings and is not on previously developed land. CPRENEY consider that the proposal is not actually in conformity with local plan policies. SD Policy ENV2 promotes a high-quality landscape, part B2 requires proposals to protect and enhance existing landscape character as described in the East Riding Landscape Character Assessment in particular important landscape areas that includes the heritage coast designation.

The site is located circa 1500m from the village, however, any visitors to the area as a result of the proposed development will not visit the services or shops by foot or public transport. It is much more likely they will drive to the shops rather than carry shopping bags back to the site along the village footpaths and then Sixpenny Hill. 800m is recorded as being the distance that people are generally willing to carry shopping, therefore, it is not an acceptable argument to state that anything over 800m is 'sustainable' in this regard and CPRENEY consider that the applicant should not be relying on pedestrian access to argue the site is sustainable.

Finally, CPRENEY are aware that the locality has a very high concentration of holiday accommodation, particularly caravan and holiday parks. With the existence of the site at the Grange, plus the proximity to

Thornwick Bay Haven site when considering an aerial plan view of the locality, the addition of 12 more units, cumulatively would detrimentally impact the Heritage Coast and character of Flamborough further. CPRENEY are very keen to see the Headland included within a potential AONB designation which would give further planning protection for this unique area. The fact that it is already over-run with sites due to favourable planning policies does not help this designation. CPRENEY, therefore would urge the Council to consider the cumulative impacts of the proposal on the wider landscape area.

### **Conclusion**

CPRENEY thank the Council for the opportunity to comment on this development proposal for 12 timber glamping pods in Flamborough. In light of the comments set out above, it is not considered that the applicant has justified the need of the proposal in such a way as to demonstrate that any benefits of the scheme outweigh the significant harm that would be caused by the development on the Heritage Coast designation. As such, CPRENEY respectfully request that the Council refuse the planning application.

Should any further information be submitted in support of the proposals, CPRENEY reserve the right to comment further.