



The countryside charity
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Branch Chair
Mrs Jan Arger

Authority: Ryedale District Council

Type of consultation: Planning Application

Full details of application/consultation 22/00514/FUL - Change of use of agricultural land to a camping site for caravans and tents to include siting of 6no. temporary toilet blocks and 6no. electrical hook up points to service 12no. pitches

At land at: Cotril Farm, New Road, Terrington, North Yorkshire, YO60 6NT

Type of response: Objection

Date of Submission: 21st 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:



KVA Planning Consultancy
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Comment

CPRE North and East Yorkshire ('CPRENEY') welcomes the opportunity to comment on this application for the change of use of an agricultural land to a camping site for caravans and tents to include siting of 6 temporary toilet blocks and 6 electrical hook up points to service 12 pitches at Cotril Farm, Terrington. However, it is noted that this is a much larger application than that set out in the application description. Whilst the application form details the above, the application form also details provision for space for 'up to 40' cars is proposed. However, additional information submitted by the applicant (dated on line 10th June 2022) sets out that the applicant proposed *'60 pitches in total, a mixture of tents, caravans and motorhomes. However, we do aim towards accommodating majority tents'*. This suggest 60 tents could be on site at any one time – which does not tally with the 'up to 40' mentioned on the application form. However, on 29th September 2022, an email from the applicant has been uploaded on to the Council's public access site setting out that 45 pitches are proposed by the applicant.

CPRENEY suggest that the Council should update the description of the proposal and then readvertise it with the correct description for the statutory period to ensure conformity with Article 15 of the Town and Country Planning (Development Management) Procedure) (England) Order 2015. At present the description is somewhat misleading and is not precise.

Having had the opportunity to consider the documents submitted in support of the application, CPRENEY object to the application in its current guise as there is insufficient information to determine that there will not be a detrimental impact to the nationally designated landscape of the Howardian Hills AONB. Therefore, at this time the application should be refused. Alternatively, the applicant should be asked to withdraw the proposal and resubmit with additional information.

CPRENEY consider that a Transport Impact Assessment (TIA) should be undertaken to determine the highway safety implications for the actual number of proposed vehicles accessing the site on to the single carriageway and the impact this will have on vulnerable road users including cyclists, pedestrians and horse riders. There is no public transport in Terrington, therefore, the site is not considered sustainable as reliance on a private car will be essential to all visitors. Therefore, capacity on the local road network in general will be increased during an already busy period of the year for a rural location and the TIA should consider the impact on other road users of this proposal alongside existing traffic flows including agricultural peaks in the area, when the development is proposed to be operated.

Furthermore, whilst information seems to be missing from the public access site detailing a proposal, there is an email from the Highways department discussing the possibility of a passing point. However, with no information in relation to vehicular movements and type of vehicle – as the application refers to motorhomes which can vary massively in size – it is not known whether one passing place is sufficient or even suitable. The NPPF states that access to the site for all users should be safe and suitable including matters of highway safety as well as capacity. As such, it is not possible without this information to determine that from a highway safety point of view, the proposal is acceptable.

It is understood that the applicant hopes to restrict evening vehicular movements, however, CPRENEY consider that this will be hard to enforce given there is no public transport or taxis within the village, the site is located within the open countryside and there are no local facilities (restaurants/pubs) that visitors could access easily. As such vehicular movements are likely to enable guests to access such facilities further afield.

A proposal for 45 pitches in the AONB should be considered as a significant development – if not major development. Paragraph 177 states that planning permission should be refused for major development other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. There is no justification for this provided by the applicants and therefore the proposal should be

refused. CPRENEY understand that agricultural businesses are increasingly looking for ways to diversify in such challenging times, however, this should not be at the expense of designated landscapes. The proposal is outside of the village envelope in the open countryside and on undulating land at the bottom of a valley which is highly visible from surrounding landscapes. The proposal for 45 pitches, plastic portaloo (considered highly incongruous in the AONB) and vehicles at this location will impact the tranquillity and visual quality of the AONB impacting on the special qualities for its designation, and it is further likely to impact the users of the nearby well-used bridleway and public right of way.

Ryedale Local Plan Strategy Policy SP13 sets out that *'the quality, character and value of Ryedale's diverse landscapes will be protected and enhanced by:*

- *Encouraging new development and land management practises which reinforce the distinctive elements of landscape character within the District's broad landscape character areas of [...] Howardian Hills;*
- *Protecting the special qualities, scenic and natural beauty of the Howardian Hills Area of Outstanding Natural Beauty, the setting of the Area of Outstanding Natural Beauty and the setting of the North York Moors National Park.'*

The policy goes on to discuss landscape character setting out that *'development proposals should contribute to the protection and enhancement of distinctive elements of landscape character that are the result of historical and cultural influences, natural features and aesthetic qualities'* – providing criteria to be applied to a development proposal which any application should be determined against.

The policy goes on to set out its priorities towards national landscape designations which is potentially the most important section to the determination of this proposal: *'The natural beauty and special qualities of the Howardian Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced and the impact of proposals on the AONB, its setting or the setting of the North York Moors National Park will be carefully considered.'*

Proposals will be supported where they:

- *Do not detract from the natural beauty and special qualities of these nationally protected landscapes or their settings.*
- *Seek to facilitate the delivery of the Howardian Hills AONB Management Plan Objectives.*
- *Are considered appropriate for the economic, social and environmental well-being of the area or are desirable to support the understanding and enjoyment of the area.*

The District Council and Howardian Hills AONB Joint Advisory Committee will resist development proposals or land management practises that would have an adverse impact on the natural beauty and special qualities of the AONB unless it can be demonstrated that the benefits of the proposal clearly outweigh any adverse impact and the proposal cannot be located elsewhere in a less damaging location.

Major development proposals within the AONB that would result in a significant adverse impact on the natural beauty and special qualities of the AONB will be considered within the context provided by national policy and only allowed in exceptional circumstances.'

CPRENEY consider a landscape and visual impact assessment (LVIA) including any photomontages taken from a variety of surrounding viewpoints which would significantly aid the determination of this proposal and its degree of impact on the AONB is missing from the submitted application. However, given that the proposal is firmly within the AONB which, in landscape terms, is awarded the highest degree of protection in planning

policy terms as a designated landscape, the same as National Parks, this remains a serious omission. The Council should request a full and thorough LVIA undertaken by a suitably qualified landscape assessor who would undertake the assessment in line with the best practise guidance as set out in Guidelines for Landscape and Visual Impact Assessment v3 (GLVIA3).

The proposal is for a change of use with potentially significant impacts on several facets which impact landscape and visual amenity, including tranquillity. Furthermore, no landscape mitigation is proposed, therefore, without such assessment it is not known as to what extent this might be required given the long reaching views towards the elevated site in the surrounding landscape.

The AONB Management Plan notes objective DRE3 as *'encourage the mitigation of intrusive features, to enhance the local landscape character and tranquillity of the AONB'*. It goes on in the Action Programme to provide an action point to this objective as DRE3.4 *'resist developments that increase the impact of light or noise pollution on the AONB or its setting'*. CPRENEY thus assert that this proposal is entirely contrary to this objective and should be refused.

It is not known whether there will be any lighting as a result of the proposal, however, even if the applicants do not propose to install fixed lighting, it is considered that the portaloos will be lit, and the vehicles, and caravans etc will all emit light in a concentrated area which would not be dark skies compliant.

It is also considered that 45 pitches could actually lead to a significant number of people (and potentially dogs) on site at any one time from the combined tents, motorhomes and caravans – as all of which are able to contain a significant number of people. – Noise is a concerning factor therefore in this tranquil setting. For example, it is possible that 1 pitch could be given to a 10man tent which could also see 2 vehicles in attendance. A noise and lighting assessment and its potential impact on the AONB should also be submitted with the application before determination. It is further thought a site management plan should be created to consider this type of detail.

CPRENEY does not wish to object to viable farm diversification projects and support many that are situated in appropriate locations and of a suitable scale and nature to their surroundings, including some within nationally designated landscapes.

However, given the major concerns set out above and lack of information provided with the application alongside inconsistencies, CPRENEY consider the proposal should be refused due to its likely detrimental impact on the nationally protected landscape of the AONB, particularly in terms of loss of tranquillity, impact from noise associated with the development and the impact of potential light pollution. Furthermore, CPRENEY believe that the proposal should also be refused on grounds of highway safety given that very little information has been presented in support of the application to assert that the proposed access is both safe and suitable for vehicular movements for up to 45 pitches in combination with other road users (including agricultural traffic), at peak times and cumulatively with movements on the wider local highway network.

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