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Branch Chair Mrs Jan Arger

Authority: Natural England

Type of consultation: Formal Statutory and Public Consultation

Full details of application/consultation: Proposed Yorkshire Wolds Area of Outstanding Natural Beauty

At land at: Yorkshire Wolds (North and East Yorkshire)

Type of response: Comment

Date of Submission: 13th January 2025

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 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.kvaplanning.co.uk

Comment

CPRE North and East Yorkshire ('CPRENEY') welcomes the opportunity to comment on Natural England's Formal Statutory and Public Consultation on a Proposed Yorkshire Wolds Area of Outstanding Natural Beauty ('AONB').

CPRE nationally and locally campaign for a thriving, beautiful countryside for everyone and believe in countryside and green spaces that are accessible to all, rich in nature and playing a crucial role in responding to the climate emergency.

The former CPRE East Yorkshire and latterly CPRENEY has a long history of campaigning for the Yorkshire Wolds to be designated as an AONB and are delighted that the area has been recognised as a potential candidate area.

CPRENEY strongly supports the principle of the two areas proposed for designation including the coastal area between Flamborough Head and Speeton Sands and the inland area near Market Weighton to the south, abutting the Howardian Hills National Landscape to the west and towards Muston to the east. We believe that these areas meet the natural beauty criteria and are also desirable to designate as England's newest National Landscape.

However, whilst we strongly support the designation we do consider that the boundary of the proposed AONB should in fact be the entire Yorkshire Wolds, as identified in Natural England's National Character Area ('NCA') profile 27. The NCA describes the Yorkshire Wolds as 'forms an arc of high, gently rolling ground extending from the Humber Estuary west of Hull, to the North Sea coast at Flamborough Head, north of Bridlington. The Wolds comprise a prominent chalk escarpment and foothills rising from the Vale of York to the west and the Vale of Pickering to the north and falling to the plain of Holderness to the east.' Much of this area was in fact immortalised in art by David Hockney's 'Yorkshire Wolds Landscapes' in recent exhibitions.

The NCA continues '*This gently rolling landscape instils a sense of openness, escapism and tranquillity provided by the expansive views, sparse population and agriculture*' which are essential elements of natural beauty found within the Natural England criteria for designating national landscapes. Based on the CPRE map of tranquillity (2006) a large proportion of the Yorkshire Wolds NCA has a strong sense of tranquillity due to its elevated views, lack of visual intrusion and sparse settlement patterns including lack of large cities and towns which is echoed in the consultant reports for the evaluation areas.

At the very least, CPRENEY consider that the designation should continue eastwards to incorporate land between area 5, 6 and 7 is effectively 'filled in' along the Great Wolds Valley to follow the Gypsey Race towards Rudston and then northwards towards Burton Flemming and on towards North Dale. Furthermore, it is considered that the proposed area 4 should extend eastwards at Muston to Muston Sands following the coastal strip south to adjoin the proposed Coastal area at Speeton Sands (area 14). The designation of these additional areas will ensure that the nationally unique landscape is protected in the highest possible terms in planning policy, giving relevant authorities a strengthened duty (as defined within the Levelling Up and Regeneration Act 2023) relating to the purpose to 'conserve and enhance the natural beauty' of the area.

The Yorkshire Wolds is the most northerly outcrop of Chalk in Britain created in the cretaceous period, some 145 million to 66 million years ago. It is imperative that this remarkable landscape is offered the protection and conservation it deserves.

CPRENEY has completed the response form and attached a plan with red markers indicating the extent of the proposed area it would like to see designated (in the very least) with our preference being for the entirety of the Yorkshire Wolds to be designated as per the Yorkshire Wolds NCA.

CPRENEY reserve the right to comment further or provide additional information if considered helpful to the consultation and designation process.



Yorkshire Wolds Proposed Area of Outstanding Natural Beauty

Response Form

Proposal to designate a new Yorkshire Wolds Area of Outstanding Natural Beauty

Response forms should be returned as soon as possible and arrive no later than midnight on Monday 13 January 2025



How to complete this response form

This response form is for recording your views on the project. Before filling it in, we recommend that you first read the enclosed Consultation Document, which contains useful information that will help you to comment on our proposals.

This response form has been divided into four parts.

- Part A is for recording information about you
- Part B is for recording comments about whether the proposed new Area of Outstanding Natural Beauty (AONB) should go ahead
- Part C is for recording more detailed comments about the proposed new AONB. This includes comments about how well they meet the natural beauty criterion, whether it is desirable that the proposed areas are designated and comments on the proposed boundary
- Part D is for recording comments on areas outside the areas proposed for designation.

Please feel free to complete as many or as few parts of the response form as you wish.

If you need more space to add your comments, please use the additional Information pages at the back of this document.

Responses to this consultation can be made on line at https://consult.defra.gov.uk/ne-landscapeheritage-and-geodiversity-team/yorkshire-woldsdesignation/ or by completing this response form and returning it as soon as possible to Natural England using the pre-paid envelope provided. Response forms must arrive on or before Monday 13 January 2025.

Thank you

Further Information

Further information about this project and the online response form can be found via:

https://consult.defra.gov.uk/ne-landscapeheritage-and-geodiversity-team/yorkshirewolds-designation

If you have any questions or require further assistance or copies of the consultation pack you can:

- E-mail us at: YorksWoldsDesignationProject@ naturalengland.org.uk
- Phone 0300 060 3900. If no one is available, please leave a message and contact details and we will return your call.
- Write to Yorks Wolds Consultation, Natural England, PO Box 295, HOLMFIRTH, HD9 9FS.

Using and sharing your consultation response Natural England does not share your personal information with anyone else.

Your responses will help to inform Natural England's decision on whether to take forward our proposals and, if so, where the boundaries should be. We will publish an anonymised summary of the responses following the end of the consultation period (with personal data removed).

Natural England respects your personal privacy when responding to access to information requests. Natural England only shares information when necessary to meet the statutory requirements of the Environmental Information Regulations 2004 and the Freedom of Information Act 2000. If you do not wish for the opinions that you give in this consultation to be shared, please fill in Question A2. This will then be considered should we receive a request under the Environmental Information Regulations 2004 and/or the Freedom of Information Act 2000. However, we cannot guarantee that your anonymised views will not be released. Please also note that the information you give in response to the Diversity Monitoring Questions at A5 will be separated from your consultation response and will not be associated with you or your responses.

For further details please see our privacy notice which is published on the consultation platform at https:// consult.defra.gov.uk/ne-landscape-heritage-andgeodiversity-team/yorkshire-wolds-designation.

Part A: Information about you

Part A of the response form is for recording information about you.

Question AI

Please complete the following details:

Title:

Mrs

Name:

Katie Atkinson

Organisation (if applicable):

CPRE North and East Yorkshire (CPRENEY)

Address:

PO Box 189, York,

Postcode:

YO7 9BL

Contact number: 07734 953236

Email:

katie@cpreney.org.uk

Question A2

Your response may be made publicly available.

Are you happy for your response to be made publicly available?





If you have answered "No", please give a reason below:

In order for us to analyse the results of the consultation, we would like to be able to look at responses from different groups of people. These could be people who have similar interests in the area; or who live in particular locations. We also need to ensure that everyone has the chance to take part in this consultation. To help us do this, we would be very grateful if you could complete questions A3, A4 and A5.

Your interest in the area

(please see the key map for the areas affected)

Question A3

Which of the following describes your relationship(s) to the areas proposed for designation?

Please complete / tick all that apply.

Area	l live
In the proposed new AONB	
Near the proposed new AONB in North Yorkshire	
Near the proposed new AONB in East Yorkshire	x
In another part of Yorkshire	
Outside Yorkshire	

Question A4

If this is a formal response on behalf of an organisation, please complete the following section.

Please tick the heading(s) that best describe your organisation.

- Local Authority
- (County, District or Borough)

Parish or Town Council

National representative group

Recreation group

Conservation group

Farming group

Business group

Other (please specify)

Diversity Monitoring

Question A5

We would also like to make sure that everyone has the opportunity to take part in the consultation. In order to monitor if this is the case, we would like to know which of the following groups you belong to.

Please tick all boxes that apply.

Note: this information will be separated from your consultation response and will not be made publicly available, except in a way that does not identify individuals.

19-44

65+

A. Age Group (please specify)

0-18

45-64

B. Disability

х

x

The Disability Discrimination Act 1995 (DDA) defines a person as disabled if they have a physical or mental impairment, which has a substantial or long term (ie has lasted or is expected to last at least 12 months) adverse effect on the person's ability to carry out normal day to day activities.

Do you consider yourself disabled as defined by Yes No the DDA?	x			
C. Ethnic Group (please specify)				
Asian/Asian British				
Bangladeshi 🗌 Indian 🗌 Pakistani				
Chinese	_			
Any other Asian background				
Black/African/Caribbean/Black British				
African Caribbean				
Any other black background				
Mixed/Multiple ethnic groups				
Asian and White				
Black African and White				
Black Caribbean and White				
Any other mixed /multiple ethnic background				
White				
English/Welsh/Scottish/Northern Irish/British	x			
Irish Gypsy or Irish Traveller				
Any other White background				
Other ethnic group				
Arab				
Any other ethnic group				
D. Gender				
Male Female X				

Note: These categories are based on those used by the Office of National Statistics.

I prefer not to say

Part B: Overall comments Proposed new Yorkshire Wolds Area of Outstanding Natural Beauty (AONB)

Part B of the response form is about whether the proposed new AONB should go ahead. **You** should complete this section if you wish to either agree or disagree with our overall proposals.

Please refer to the Consultation Document and Maps before answering this question. Natural England is proposing to designate a new Yorkshire Wolds Area of Outstanding Natural Beauty, as shown on the map in the Consultation Document.

Question BI:

Do you think the proposed areas should be designated as AONB? **Please tick one box for each area.**

Proposed new AONB	Yes I agree	l neither agree or disagree	l don't agree	l don't feel able to comment
Inland Area	X			
Coastal Area	X			

Part C: Comments on Areas Proposed for Designation

(if you wish to comment on areas outside the areas proposed for designation, please go to Part D)

Introduction

Part C of the response form is for recording more detailed comments about the areas proposed for designation. This might include how well each area (or parts thereof) meet the natural beauty criterion, whether it is desirable that the areas should be designated and about the proposed boundary. If you wish to comment on the boundary please provide your comments in section C5 and C10. If you also wish to comment on areas which are not currently within the proposed designation, please enter these comments in the next section of the form (Part D), please do not put them in Part C.

When answering the questions in this section, please make reference to the factors that we have taken into account when assessing natural beauty, and desirability of designation. You should also consider the boundary setting considerations when commenting on the proposed boundaries. You can find this information in the Consultation Document, as follows:

- Factors for assessing natural beauty (page 6)
- Factors for assessing desirability of designation (page 6)
- Boundary setting considerations (page 7)

You should also consider the A3 maps 1-15 showing the proposed boundary at 1:25,000 scale.

For more detailed information please consult the full Technical Documents and Natural England Guidance for Assessing Landscapes for Designation as a National Park or Area of Outstanding Natural Beauty (AONB) (Revised, June 2021) via this link:

https://consult.defra.gov.uk/ne-landscape-heritage-and-geodiversity-team/yorkshire-wolds-designation/

This part of the response form provides an opportunity to comment on the proposed new AONB in detail. You should answer questions CI - CI0.

It would be helpful if you could explain the reasons for your views in the relevant text box supplied below each question. If you require more space please continue your response on the additional sheets of paper on pages 12 and 13, specifying which question number you are answering next to the relevant text. You may comment on one or both of the proposed areas.

Commenting on the proposed boundaries

If you wish to recommend an alternative boundary for the proposed new AONB, please draw an amended boundary line(s) onto the relevant A3 map(s) or alternative map base.

Please return your amended map(s) to us either digitally or by post, together with this response form. Alternatively please email your map(s) to us at:

YorksWoldsDesignationProject@naturalengland.org.uk enclosing your name and postcode in the email so that we can associate it with your response.

Inland Area:

Please refer to the Consultation Document, as well as relevant maps before answering the following questions.

Ouestion CI:

Does this area have sufficient natural beauty to be designated as AONB?

X

Not sure

Please give reasons for your views:

No

CPRENEY fully supports the designation of AONB to the inland area proposed by Natural England. Having considered the documentation published as part of the consultation pack, CPRENEY are satisfied that the proposed area has more than sufficient natural beauty to meet the requirements for designation as set out in the Guidance document. CPRENEY largely agrees with the natural beauty assessment as published for those areas which have been included (other suggested areas are reported in response to question D below). The landscape quality, scenic quality, tranquillity, dark skies, 'relative wildness', natural heritage features and cultural heritage has all been considered and described in detail within the assessment documentation.

Ouestion C2:

Is there any other important information that we should include in our assessment of this area's natural beauty

Y	20
	es

No

If yes, please give further details:

Qu	estion	C3:
~ ~		

Is it desirable to designate this area as AONB due to its natural beauty?

Yes

No

Not sure

Please give a reason for your views:

CPRENEY consider that it is highly desirable to designate the inland area as an AONB in order to conserve and
enhance the natural beauty of the Yorkshire Wolds and in doing so receive the highest level of landscape
protection in planning policy and would enable authorities to access additional resources for positive
enhancement and management of the proposed area. CPRENEY consider that the Yorkshire Wolds landscape is
nationally significant (in a similar way to the already designated Lincolnshire Wolds AONB which were formed
in the same Cretaceous period, circa 146–65 million years ago, heading northwards from Lincolnshire to
Flamborough Head and under the North Sea to rise again in Norway) and the designation of the Yorkshire
Wolds would provide a more robust level of protection than can currently be offered through the designation
of locally valued landscape policies.

Question C4:

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Is there any other important information that we should include in our assessment of the desirability of designating this area?

Yes		No		
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If yes, please give further details:

Question C5:	
Question C3.	
Do you agree with the proposed boundary?	
Yes X No Not sure I wish to suggest an alternative boundary]
Please give a reason for your views:	
CPRENEY agree that the proposed area should absolutely be designated as an AONB, – However, consider that the inland area should and could 'join' up to the proposed coastal area, to include further areas currently considered to be transitional in the consultation documents. CPRENEY consider that whilst landscape features may differ across the southern, central and northern Wolds, the predominant chalk feature running throughout the area and high quality components of natural beauty are sufficient to designate the Yorkshire Wolds as defined in the Natural England National Character Area (No. 27)	

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If you wish to recommend an alternative boundary, please draw an amended boundary onto the relevant A3 map or alternative map base and return it to us either digitally or by post, together with this response form.

Coastal Area:

Please refer to the Consultation Document, as well as relevant maps before answering the following questions.

Question C6:

X

Does this area have sufficient natural beauty to be designated as AONB?

Yes

No

Not sure

Please give reasons for your views:

CPRENEY also fully supports the designation of AONB to the coastal area proposed by Natural England. Having considered the documentation published as part of the consultation pack, CPRENEY are satisfied that the proposed area has more than sufficient natural beauty to meet the requirements for designation as set out in the Guidance document. CPRENEY largely agrees with the natural beauty assessment as published for those areas which have been included (other suggested areas are reported in response to question D below). The landscape quality, scenic quality, tranquillity, dark skies, 'relative wildness', natural heritage features and cultural heritage has all been considered and described in detail within the assessment documentation.

Question C7:

Is there any other important information that we should include in our assessment of this area's natural beauty?

Yes X No

If yes, please give further details:

CPRENEY consider that the advice set out in Natural England's 'Guidance for assessing landscape designation' document at paragraph 6.12 that 'the effects of incongruous features are assessed for the extent to which they detract from the natural beauty of an area. It is relevant to take into account the degree to which a feature is temporary or transient' – is entirely relevant to the designation of the Coastal Area. Whilst the inland section of the headland features a number of holiday parks, of varying sizes and types (e.g. mobile and static caravans), it is notable that the caravan development is not permanent in that they are not fixed to the ground, albeit acknowledged there is a static caravan presence all year round. The guidance goes on to say that 'it's is a matter of judgement whether an incongruous feature has such an adverse effect that the whole potential designation fails to meet the natural beauty criterion or whether it can be included.'

CPRENEY would argue that whilst it is regrettable that the level of tourist accommodation development was consented in the Heritage Coast designation, the natural beauty of the coastline and adjacent areas of land adjoining the coast, particularly the villages of Flamborough and Bempton have not in fact adversely effected by the developments. The 'temporary' caravans could not only be removed at any point, but some of the white caravans mentioned within consultation documents are being replaced by more modern green coloured units. Furthermore the existing wealth of cultural, scenic and landscape quality alongside natural heritage features including a wealth of protected species and habitats (recognised through a variety of international and national designations) is so significant, that these areas which make up the Heritage Coast and are included within the Natural England Yorkshire Wolds National Character Area should also be included in our opinion. CPRENEY suggest that insufficient weighting has been given to these areas as a result of the 'temporary' man made features within the landscape and thus consider that the areas would benefit from the more robust policy that would be afforded to an AONB designation than that currently attributed to the Heritage Coast or locally valued landscape.

Question C8:

Is it desirable to designate this area as AONB due to its natural beauty?

Yes	x	No	Not sure
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Please give a reason for your views:

As set out in our response to question C3, CPRENEY consider that it is highly desirable to designate the coastal area as an AONB in order to conserve and enhance the natural beauty of the Yorkshire Wolds and in doing so receive the highest level of landscape protection in planning policy and would enable authorities to access additional resources for positive enhancement and management of the proposed area. CPRENEY consider that the Yorkshire Wolds landscape is nationally significant and the designation of the Yorkshire Wolds would provide a more robust level of protection than can currently be offered through the designation of locally valued landscape policies and would offer a further degree of control to the authorities in relation to existing developments as occurs in other AONBs.

Question C9:

Is there any other important information that we should include in our assessment of the desirability of designating this area?

Y	es

Yes

No

If yes, please give further details:

Question CI0:

X

Do you agree with the proposed boundary?

No No

Not sure

l wish to suggest an alternative boundary

x

Please give a reason for your views:

As set out in our response to question C5 above, CPRENEY agree that the proposed area should absolutely be designated as an AONB, – However, consider that the coastal area should and could 'join' up to the proposed inland area, to include further areas currently considered to be transitional in the consultation documents. CPRENEY consider that whilst landscape features may differ across the southern, central and northern Wolds, the predominant chalk feature running throughout the area and high quality components of natural beauty are sufficient to designate the entire Yorkshire Wolds as defined in the Natural England National Character Area (No. 27) and including the land adjacent to the proposed coastal area which includes areas already developed to some degree as discussed above.

If you wish to recommend an alternative boundary, please draw an amended boundary onto the relevant A3 map or alternative map base and return it to us either digitally or by post, together with this response form.

Part D: Comments on Areas outside the areas proposed for Designation

Question DI:

Do you think there are other areas of the Yorkshire Wolds which should be included in the proposed new Yorkshire Wolds AONB?

Yes x No Not sure

Please give reasons for your views:

The Natural England 'Guidance for Assessing Landscapes for Designation' document sets out clearly at para 5.3 how technical criteria should normally be applied when considering Natural Beauty. It sets out that land to be included in a proposed designation 'does not need to be of the same or similar character' – 'there is no requirement that every parcel of land must meet the criteria' – 'there may be small areas of land which do not'.

Having considered the consultation documents and the consultations maps, CPRENEY remain of the opinion that the entire National Character Area (No. 27) The Yorkshire Wolds, should be included within the designation believing that the natural beauty of the entire area, whilst not being if the same character across all 3 sections of the Wolds (northern, central, southern) is sufficiently interconnecting to be considered desirable for full designation. The NCA Summary sets out clearly the character and profile of the Yorkshire Wolds setting out that 'The Wolds comprise a prominent chalk escarpment and foothills rising from the Vale of York to the west and the Vale of Pickering to the north, and falling to the plain of Holderness to the east. A very low proportion of the area is urban and woodland, and the vast majority of the land is agricultural. Woodland planting is restricted to small, scattered woodland blocks on higher land and steeper slopes. This gently rolling landscape instils a sense of openness, escapism and tranquility provided by the expansive views, sparse population and agriculture. **Protection of the rural character and long, open views is important for conservation of this distinctive landscape.'** It goes on to state 'The area has a varied cultural and historical heritage, with evidence of extensive settlement from the Neolithic to the Late Medieval Period – the rich prehistoric ritual landscape at Rudston, numerous bronze age burial mounds, iron-age ladder settlements and deserted medieval villages.' And in relation to biodiversity, the 'Wolds represent the most northerly outcrop of chalk in Britain and therefore accommodate the northern extent of the range of many species.'

Should Natural England consider that they are not able to include the whole of the NCA area as we promote, then **in the very least** CPRENEY considers that there are other areas of sufficient natural beauty as to be desirable to be included within an AONB designation and would effectively serve to 'link up' the inland and coastal areas to form one larger designation rather than two fragmented areas which were considered by the Natural England consultants and were discounted. CPRENEY considers that a larger section of the Great Wolds Valley (Area 6) should be included within the designation, following the Gypsey Race towards Wold Newton and Burton Flemming, which feature several sites of cultural heritage, traditional chalk and agricultural workers cottages set in large open rural landscapes interspersed with pockets of woodland. The area is locally designated as 'important landscape area' in the current Ryedale Local Plan Strategy although it is understood that North Yorkshire Council are in the process of producing a new Local Plan and it is unknown as to whether local designations will be retained. Furthermore, the area to the south of the Great Wold Valley (Area 7) including Rudston heading towards Boynton is considered to be of high landscape quality reflecting both cultural heritage and historic estate management via Thorpe Hall (Rudston) and Boynton Hall.

CPRE Dark Skies Mapping indicates that all of this area has relatively dark skies and enjoys relatively high levels of tranquillity which feature as natural beauty indicators, as well as landscape and scenic beauty.

The consultation documents set out the areas of greater natural beauty are located towards the head of the Wolds Valley, whilst areas along the course of the Gypsey Race have pockets of isolated beauty and are surrounded by tracts of non-qualifying agricultural land.

Additional Information

Please use the following two pages to comment on boundary refinements or to add any additional notes or comments as part of your responses to Part C. When adding additional notes/ comments, please be sure to clearly name the area you are referring to and include the number of the question that your comments relate to, as appropriate.

However, on reflection, CPRENEY consider that this is contrary to Natural England's Guidance as quoted above in that there is no requirement for every parcel of land to meet every criterion and also that a designation can wash over a tract of land even though that land itself does not meet the designation criteria provided it sits within a sweep of qualifying land.

CPRENEY agree that land toward the east of the area heading to Bridlington does not meet the qualifying criteria, however, based on our considered view and as set out above feel that the boundary should be adjusted as described below.

Area 6 from the Head of the Great Wolds Valley at 'The Lutton's' should be extended eastwards towards Wold Newton and Burton Flemming. This area includes a significant amount of cultural heritage, provides expansive open views across the rural landscape. Similarly the area immediately to the south should effectively be 'filled in' to join up to the existing Area 7 ensuring that the existing 'setting' between these two areas are in effect protected from development which can adversely impact the designation.

Furthermore, CPRENEY believes that the designation should continue eastwards following the B1253 towards Rudston and potentially Boynton before heading north following the Gypsey Race towards Maidens Grave Farm and Burton Flemming.

Finally, <u>at the very least</u>, CPRENEY consider that both the inland and coastal areas should effectively be joined up to create one area of designation by extending the current Area 4 eastwards from Muston to Muston Sands, and then following the coastal strip through Hunmanby Sands and Reighton Sands to abut the existing Speeton Sands (avoiding the holiday parks at Primrose Valley if considered necessary). CPRENEY would also support the inclusion of land within the on-land boundary of the Flamborough Headland Heritage Coast within the AONB boundary which includes not only includes areas of significant natural beauty but also cultural heritage, traditional built vernacular which are strong characteristics of settlements within the Heritage Coast (traditional chalk fishermen's cottages etc.), Danes Dyke, and Flamborough Castle, lighthouses and cave tunnels and managed parkland at Sewerby Hall and Park.

Yorkshire Wolds Area of Outstanding Natural Beauty: Response Form

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Front cover image: copyright Susannah England



Natural England is here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

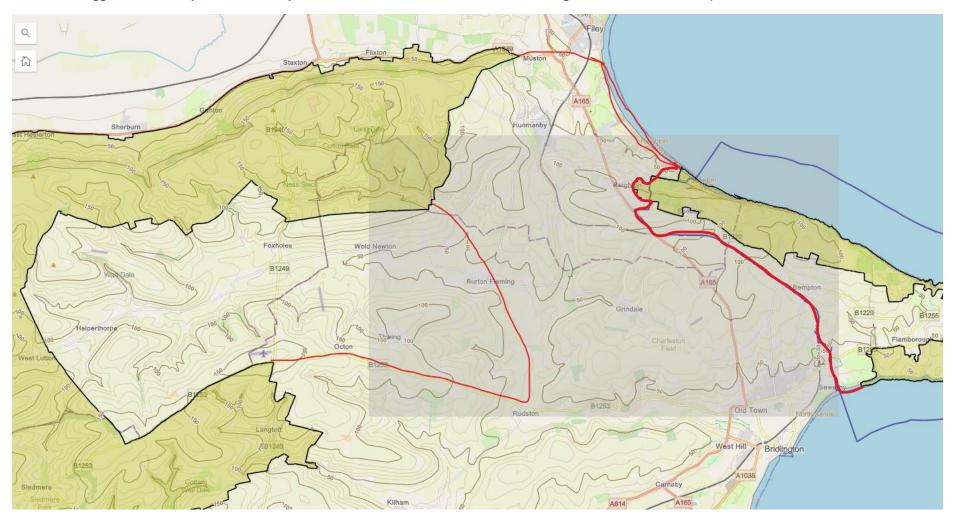
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CPRENEY suggestions for adjusted boundary to Yorkshire Wolds AONB – to be read alongside formal written response.