

Change of Use of Land to Form an Extension to the Existing Holiday Park

Upper Carr Holiday Park

Planning, Design & Access Statement





Planning and Development Consultant

Report Title: Planning, Design & Access Statement
Client: Flower of May Holiday Parks
Proposal: Change of Use of Land to Form an Extension to the Existing Holiday Park and Relocation of Site Access

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1. Introduction

- 1.1 This Planning, Design and Access statement has been prepared on behalf of Flower of May Holiday Parks Ltd in support of an application for the change of use of land to allow for the extension of an existing holiday park on land to the north and east of Upper Carr Holiday Park, Upper Carr Lane, Pickering, North Yorkshire YO18 7JP.
- 1.2 This statement and accompanying documents provide details of the proposed development, an assessment of the potential effects of the proposed development and means by which these effects may be mitigated. The statement identifies relevant planning policy and other material considerations and considers the appropriateness of the proposed development in that context. The statement demonstrates that the proposed works comply with the requirements of planning policy and other material considerations and should be granted planning permission.

2. Background

- 2.1 The applicant company was formed in 1992 and now owns and operates nine holiday parks across East and North Yorkshire. These Parks provide a mixture of holiday types including camping and touring caravan sites, static units for rental and, as is the case with the Upper Carr Holiday Park, static units for owners.
- 2.2 The planning history of Upper Carr Holiday Park stretches back to the early 1970s. It is understood that planning permission was first granted for the siting of 60 caravans and toilet blocks at the existing Holiday Park in 1973 (Ref 5/2/860B). This consent was extended in 1976 to allow for the siting of up to 100 caravans (Ref:3/102/144/PA). Neither of these applications specified whether those 100 units would be static or touring and the submitted documents are not available from the local planning authority's online planning register. Subsequent applications were made to vary the type of accommodation allowed including both touring caravans and lodges. However, the number of units, up to a maximum of 100, was maintained. The existing site operated for many years in accordance with planning permission 3/102/144Q/FA (the 1989 permission) which allowed for the siting of 20 chalets and 80 touring caravans.
- 2.3 Planning permission was granted in 2008 (ref 07/01039/73) to vary condition 5 of the 1989 permission to allow the use of part of the existing site for the siting of static caravans. Information accompanying this application suggested that 18 static caravans would replace 25 touring pitches, although this was not limited by condition.
- 2.4 Planning permission was granted in 2011 for the change of use of a section of the caravan park originally permitted for 20 holiday chalets to allow the siting of 26 static holiday caravans (Ref 11/00562/FUL). This was subject to condition 3 which limited the total number of units across the existing site to no more than 100 (statics, touring and chalets).
- 2.5 A further permission was granted in 2015 for the siting of 29 static holiday caravans on an area previously used for touring caravans and camping (Ref 15/00641/FUL). This permission related to only part of the existing site and was granted subject to conditions which restricted the number of static units in the application site to 29m however, the overall permitted number of pitches remained unchanged.
- 2.6 It is therefore considered that, given the planning history, a detailed list of which is provided at Appendix 10, the existing site has, historically, been able to accommodate up to 100 units.
- 2.7 The existing Holiday Park has developed over a near fifty-year period to provide owner holiday accommodation. It should be noted that the existing holiday park operates in accordance with current planning permissions and none of the existing units are occupied as the primary place of residence of any owner.

- 2.8 Planning Application 21/00871/MFUL was submitted to Ryedale District Council on 4th June 2021. Following constructive discussions with the Highways Authority, that application has been withdrawn and the application to which this Statement relates has been submitted in direct response to, and incorporating the advice of, North Yorkshire Highways.

Relevant Legislation

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017

- 2.9 Regulation 3 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regs) prohibits the grant of planning permission for Environmental Impact Assessment (EIA) Development.
- 2.10 Schedule 1 of the EIA Regs sets out those forms of development for which the undertaking of EIA is mandatory and planning applications for which must be accompanied by an Environmental Statement (ES). The proposed development set out in this application does not fall within any of the descriptions of development set out at Schedule 1 of the EIA Regs.
- 2.11 Schedule 2 of the EIA Regs describes those forms of development for which EIA may be required and establishes a series of thresholds and criteria against which the proposal should be assessed to determine the need for EIA. Whilst establishing the thresholds and criteria, the Regulations are also clear that the determining factor in the need for EIA is the likelihood of significant effects. Therefore, even when development falls within the definitions set out in Schedule 2, it does not automatically follow that EIA is required.
- 2.12 The development set out in this application comprises an extension to an existing caravan park. Part 12(e) of Schedule 2 of the EIA Regs describes Permanent camp sites and caravan sites and applies a threshold of 1 hectare to determine that a site falls within the Schedule. The existing Upper Carr Holiday Park extends to some 2 hectares with the proposed extension covering an additional area of some 6.8 hectares. The proposed development therefore falls within Schedule 2. Paragraph 018 of the online Planning Practice Guidance (PPG) is clear in stating that “*only a very small proportion of Schedule 2 development will require an Environmental Impact Assessment.*”
- 2.13 Nevertheless, the key determinant of the need for EIA is the likelihood of significant effects occurring as a result of the proposed development. This Statement and the accompanying technical reports on highways, flood risk, drainage, ecology and landscape all demonstrate that the proposed development is not located in an area defined as being “sensitive” in the EIA Regs, would not give rise to significant effects and proposes appropriate mitigation measures and controls which can be secured through planning conditions. The submitted application clearly demonstrates that the proposed development, whilst falling within Schedule 2 of the EIA Regs, would not give rise to significant environmental effects and does not, therefore, comprise EIA development.

3. Format of the Application

- 3.1. This supporting statement describes the development and proposed use and seeks to demonstrate that the proposal comprises sustainable development.
- 3.2. The format of the application provides a description of the site at Section 4 and a detailed planning history at Section 5. A description of the proposed built and operational development is provided at Section 6 along with a summary of potential environmental affects and proposed mitigation measures at Section 7. Section 8 provides an assessment of the planning merits of the proposed development (relevant policies and other material considerations are reproduced in detail at Appendix 10). Section 9 of the report draws together the foregoing sections and demonstrates that the proposal meets the definition of sustainable development.

3.3. Detailed assessments have been undertaken in support of the application specifically in respect of the following matters:

- Biodiversity (including preliminary ecological appraisal and great crested newt survey)
- Flood Risk (including drainage, sequential and exception test)
- Landscape
- Transport

3.4. The planning application therefore comprises the following documents:

Document Type	Reference (where applicable) & Date	Description
Planning Application Forms	n/a	Completed planning application forms
Planning, Design & Access Statement	2020.40.71 October 2021	Statement setting out details of the proposed development and how that development complies with the requirements of adopted planning policy and material considerations.
Drawing	FM UC 1809 5 Jan 2019	Site Plan as Proposed
Drawing	FMUC18096 Sept 2021	Plan, Elevations and Section of Proposed Park Managers Accommodation
Drawing	FMUC18097 Sept 2021	Plan, Elevations and Section of Proposed Caravan Sales Unit
Drawing	2020.40.71/1 30/10/2020	Site Location
Drawing	2020.40.71/2 30/10/2020	Planning Application Boundary
Drawing	06-10211-01 02/06/2010	Topographical Survey
Report	17609-L-RP-002-R0 28/01/2020	Flood Risk Assessment
Report	17609-L-RP-001-R0 15/01/2020	Drainage Assessment Report
Report	n/a April 2020	Sequential and Exception Test Technical Note
Report	n/a March 2020	Extended Phase 1 Habitat Survey & Preliminary Ecological Appraisal
Report	n/a March - May 2020	Great Crested Newt Survey Report
Report	LTP/20/4085 November 2020	Transport Statement & Supplementary Transport Note
Report	BG/UC001 December 2020	Landscape & Visual Impact Assessment

4. Site Location & Description

Site Location

- 4.1. The application is located immediately to the north and east of the existing Upper Carr Holiday Park, to the east of the A169 Malton Road, approximately 2km to the south of the centre of Pickering. An approximate grid reference for the application site is 480400; 481568.
- 4.2. The site is located wholly within the administrative areas of Ryedale District Council and Pickering Town Council.
- 4.3. The location of the site can be categorised as being broadly agricultural in nature, however there are several camping and holiday parks in the vicinity of the application site; Pickering Lodges is located immediately to the south of Upper Carr Lane, with the Black Bull Caravan Park immediately to the west, on the opposite side of the A169. In addition, the Ryedale Exhibition and Leisure Village, granted planning permission in 2013 for 133 lodges and associated facilities, has been started, but not yet completed, on land immediately to the west on the opposite side of the A169. Flamingo Land theme park, zoo and resort is located some 3km to the south west.
- 4.4. The boundary of the North York Moors National Park is approximately 1500 metres to the northeast of the application site.
- 4.5. A review of the information available on the government's MAGIC website shows that there are no nationally or internationally designated sites within the application area for the protection of biodiversity, the landscape or heritage.
- 4.6. Along with the boundary of the National Park, there are a number of other designated features within the 2km of the application site, including:
 - 15 no. Grade II Listed buildings, the closest of which are located at Barr Farm, some 430 to the south west of the application site;
 - 1 no. locally designated Site of Importance for Nature Conservation located some 1300m to the north of the application site at Outgang Road; and
 - 1 no. candidate Site of Importance for Nature Conservations some 1200m to the south west of the application site off Tofts Road.
- 4.7. In addition, the site lies within the SSSI Risk Impact Zone for Haugh & Grindale Slacks SSSI. Whilst within the risk impact zone, the SSSI itself is located to the north of Pickering, some 4km to the north of the application site. It should also be noted that the nature and scale of the development set out in this application does not trigger the need to consult Natural England.

Site Description

- 4.8. The application site comprises approximately 6.8 hectares of agricultural land of which approximately 4 hectares is recorded as being Grade 4 agricultural land, the remaining 2.8 being recorded as Grade 3. It is not known whether this Grade 3 land is 3a or 3b and therefore whether that comprises Best and Most Versatile Land.
- 4.9. Topographic survey of the site shows that it is broadly flat with a gentle incline from east to west at an elevation of around 22-23m above ordnance datum, bounded along all sides by hedgerows and hedgerow trees.
- 4.10. Access to the application site can currently be gained via field access points taken from either the A169 or Upper Carr Lane.
- 4.11. Along the western boundary of the application site lies Outgang Drain, an ordinary watercourse managed by the Vale of Pickering Internal Drainage Board.
- 4.12. The site lies within an area which has been identified as having a varied risk of flooding, small parts of the site are identified as having no flood risk, however, the bulk of the site is identified as falling within Flood Zones 2 and 3. This matter is discussed in further detail below and additional information is provided at Appendices 1-4 in the form of a flood risk

assessment, drainage strategy, sequential and exception test and flood evacuation management plan.

- 4.13. The site lies outside any areas designated for their importance for nature conservation, heritage or landscape. Matters relating to biodiversity are discussed below and in Appendices 5-6 whilst an assessment of the potential impacts upon the landscape are discussed below and provided at Appendix 8.
- 4.14. Immediately adjacent to the application site is the existing Upper Carr Holiday Park. The existing park comprises a permitted holiday park with consent for the siting of up to 100 static caravans and this application would form an extension to those existing operations. The boundary between the application site and the existing holiday park is formed by a hedgerow and drain. This drain is an agricultural field drain and does not comprise an ordinary watercourse.
- 4.15. Access to the existing site is currently gained from Upper Carr Lane via the A169 Malton Road. The A169 forms part of the primary highway network whilst Upper Carr Lane is an unclassified road.
- 4.16. Bus stops are provided to the south of the Black Bull public house on both the north and southbound carriageways of the A169. Both these stops are served by the 840 Coastliner Tadcaster - Whitby route which stops here 11 times Mon-Fri, 9 times on Saturdays and 5 times on Sundays. This route also stops close to the nearest rail station located some 11.3km to the south west in Malton.

5. Planning History

- 5.1 A review of the Ryedale District Council online planning register indicates that the application site has no planning history. Land immediately adjacent to the application site and within the control of the applicant has a longstanding planning history for use as a camping and caravan site, stretching back to the early 1970s. A detailed summary of the planning history of the existing Upper Carr Holiday Park site is provided at Appendix 9 of this report.

6. Description of Proposed Development

- 6.1. This application proposes the change of use of approximately 6.8 hectares of land to form an extension to the existing Upper Carr Holiday Park, including the layout and formation of internal access roads and hard standings to allow the siting of an additional 127 static caravans, revisions to the layout of the existing Upper Carr Holiday Park to provide a new caravan sales area and associated car parking spaces for 8 no. visitors, reduce the number of permitted units at the existing holiday park from 100 to 75 and construction of a relocated site access onto the A169 Malton Road. The proposed development would thereby lead to a net gain of 102 static units.
- 6.2. No additional built development is proposed as part of this application and the extended site would make use of the existing facilities currently provided at the Upper Carr Holiday Park.
- 6.3. In detail the planning application proposes the following development:
 - Construction of a new junction to provide access onto the A169 Malton Road;
 - Change of use of land to form an extension to the existing Upper Carr Holiday Park;
 - Formation of 127 new concrete bases for the siting of static caravans;
 - Formation of new internal access roads;
 - The formation of a permeable blockwork surfaced car parking bays;
 - Formation of two new waterbodies;
 - Creation of a recreation area;
 - Installation of new drains to facilitate the management of surface water;
 - Installation of Klargestor Biodisc BM or similar specification package water treatment plant for the management of foul water;

- provision of new landscape planting within the application site;
- Establishment of a caravan sales area including the provision of a small sales office;
- Siting of warden's accommodation measuring 12.8 x 6.1m (external) with additional wooden patio area.

6.4. In addition, a small number of changes would be made to the existing holiday park. These do not require the express grant of planning permission but are included here for the sake of completeness:

- Reduction in the number of holiday homes provided in the existing park from the currently permitted 100 to 75 (outside Section 55 of the Town and Country Planning Act 1990); and
- Cessation of use of the existing caravan park access for all but emergency use.

7. Summary of Potential Environmental Effects and Proposed Mitigation

7.1. This section identifies the likely main impacts of the proposed development and the means to be employed to ensure that these impacts are effectively mitigated. Detailed assessments of the proposed development are set out in the attached appendices.

Biodiversity

7.2. The applicant has undertaken Preliminary Ecological Appraisal (PEA) of the application site.

7.3. The PEA identifies that the following habitat types are found within the site:

- Scrub;
- Semi improved neutral grassland;
- Arable;
- Amenity grassland;
- Species poor hedge with trees;
- Defunct species poor hedge; and
- Running water.

7.4. The PEA identifies that a number of species were targeted for consideration, these being:

- Bats;
- Great crested newt
- Badger
- Reptiles
- Birds
- Hedgehog
- Water vole.

7.5. The PEA goes on to identify that, for the majority of those species listed above, the application site does not provide suitable habitat and no further surveys have been recommended. However, in respect of birds, the PEA recommends restrictions on the timing of clearance works. The PEA also identifies that one pond is found within 10m of the site boundary and records indicate that populations of great crested newt are found within that pond. A further two ponds are located within 150m of the application site. The PEA therefore recommends that a presence/absence survey and population size class assessment are undertaken.

7.6. Presence/absence surveys comprising six field surveys were undertaken during April/May 2020. The results of these surveys are reported at Appendix 6 of this Statement and confirm the presence of a medium sized population of great crested newts at Pond 1, within 10m of the application boundary. The two further ponds were found to contain fish, including stickleback, which would indicate that they were unsuitable for great crested newts. The report concludes that a Natural England Development Licence would be required for the

proposed development, including a minimum of two years post development monitoring to determine the impacts of the development on local populations. Section 8.0 of the Great Crested Newt Survey Report sets out a provisional method statement to support a Natural England License application including those methods to be employed to avoid potential harm to great crested newts.

- 7.7. The report goes onto identify compensation measures to be undertaken to create a minimum of 0.5 ha of optimum terrestrial and aquatic great crested newt habitat within the application site.

Flood Risk

- 7.8. The accompanying Flood Risk Assessment (FRA) (Appendix 1) identifies that the application site is at only medium or low risk of flooding from surface water, non-main watercourses, groundwater, existing sewers, reservoirs or the sea. However, the FRA confirms that a large part of the application site falls within an area identified as being within flood zone 3 and being at high risk of flooding from rivers and watercourses. The planning policy implications of this are considered further in Section 8 of this statement.
- 7.9. Detailed modelling information provided by the Environment Agency indicates that, in the southern and western parts of the application site, flood waters reach a depth of 0.342m whilst a significant area of the north eastern part of the site remains unaffected by flooding. the FRA recommends that all finished floor levels are sited approximately 0.6m above ground level and all static caravans are securely tethered to the ground.
- 7.10. The FRA identifies that the proposed development would result in the loss of approximately 2 hectares of land that is currently wholly permeable, to be replaced by internal access roads which would be impermeable and hard standings which would be semi-permeable. The FRA recommends that the proposed development would not increase the risk of flooding elsewhere subject to the design of a suitable surface water management strategy. Such a strategy is provided at Appendix 2 of this report. The submitted drainage strategy has calculated that the greenfield run off rate should be 8.2l/s. Based upon that run-off rate; the required surface water storage volume has been calculated as being 594m³. Appendix C of the drainage strategy provides a schematic drainage layout.
- 7.11. The FRA also concludes that the proposed development would be acceptable subject to an exception test which also requires a flood evacuation and management plan. Appendix 3 of this report provides a consideration of the sequential and exception tests and finds that *“the improvement of the accommodation facilities at Upper Carr Caravan Park will contribute to the provision of improved tourism assets which deliver direct benefits to the local community. This would outweigh the flood risk determined for the Development Sites.”*. The existing holiday park currently operates in accordance with flood evacuation and management plan. Appendix 4 provides an amended plan to take into account the proposed extension to the existing site.

Landscape and Visual Impact

- 7.12. Appendix 8 of this report provides a Landscape Assessment which sets out a detailed assessment of the likely effects of the proposed development on both the landscape and visual receptors. The assessment also proposes planting mitigation details likely to reduce or minimise potential adverse effects.
- 7.13. The site lies within the Vale of Pickering National Character Area (Area 26) described as:
“A low-lying basin of flat or gently undulating topography, lying between North Yorkshires uplands to the north, west and south, and the Scarborough coast on its eastern side. As such it has physical links with many surrounding areas, particularly through river catchments.....This is a landscape of rivers and wetlands which have been artificially drained and modified for productive farming...There are strong visual links between the

Vale of Pickering and its surrounding uplands: the North York Moors and Cleveland Hills to the north, the Howardian Hills to the west and the scarp of the Yorkshire Wolds to the south .”

- 7.14. At a County level the site lies within Open, Carr/Vale Farmland 22) as identified in North Yorkshire and York Landscape Characterisation Project (2011). The area is described as:
- “The Open Carr Vale Farmland is predominantly flat landscape at the foot of the Limestone Foothills and Valleys which provide a sense of enclosure to the north. It is underlain by glacialacustrine clays and sands which were deposited by the former lake Pickering which occupied much of the area during and subsequent to the last glaciation. Following the last glaciation Lake Pickering drained away leaving behind a complex of rivers and marshes. Names in the area bear testimony to this with frequent mention of carrs, ings moors and marshes. These features have now all been drained resulting in a landscape that is crossed by a network of canalised water courses, cuts and drainage dykes which regulate the water table. A patchwork of arable and pastoral fields prevails. This landscape is crossed by a network of relatively straight roads and wide verges with all managed predominantly thorn hedges. Settlement pattern is scattered comprising relatively isolated farmsteads”.*
- 7.15. At a local level, the application site is located within Area K of Ryedale District’s Vale of Pickering Landscape Character Assessment (Gillespies; 1999). Area K is defined as linear farmland *“confined to the south side of Pickering where it forms a boundary with the Fringe of the Moors regional character area, a boundary that is approximated by the A170. It extends southwards into the vale to form an area that extends eastwards from the Riseborough Hill, passing to the north of Flamingoland at Kirby Misperton...*
- This is typically a gently sloping landscape which rises from approximately 23mAOD in the south to 28mAOD in the north. Although subtle this gentle variation is notable in comparison to much of the rest of the vale, much of which is extremely flat and low-lying.”*
- 7.16. The assessment considers the potential impacts of the proposed development on both the landscape and visual impact and confirms that there are no landscape designations associated with the site.
- 7.17. At the landscape scale, the assessment finds the landscape to be of medium value, with a medium susceptibility to change giving rise to a medium sensitivity. The assessment goes on to find that the introduction of the additional small-scale development would result in a low magnitude of change on local landscape character and therefore give rise to an overall minor level of adverse landscape effect.
- 7.18. A zone of theoretical visibility (ZTV) model accompanies the application showing those areas from which the proposed development could be visible. The ZTV shows that views are not possible from the west, and from the south and east only the upper parts of the development could be viewed. The ZTVs at the proposed development is not likely to be visible. The report concludes that the model is likely to reflect actual views as it is based on accurate LIDAR data which includes topography, intervening woodland and built development.
- 7.19. Nevertheless, to confirm the findings of the ZTV further assessment of potential visual impacts has been undertaken based upon eight viewpoint assessments. These viewpoint assessments onled that, immediately post construction, visual impacts would range from moderate adverse to negligible. After 5-10 years, all these impacts would range from negligible to minor beneficial.
- 7.20. Notwithstanding the likely effects of the proposed development upon both the landscape and visual receptors, the assessment recommends various mitigation measures. Measures proposed to ensure that the proposed development would not have an unacceptable impact upon the landscape or visual amenity include the careful choice of muted colours for the proposed units, landscape mitigation measures such as those set out on drawing FM/UC/1809/5 which provide for additional tree planting, additional hedgerow planting and

management of existing hedgerows. It is anticipated that these measures would “*significantly enhance local visual amenity and biodiversity...*”.

Traffic & Transport

- 7.21. Appendix 7 of this report comprises a transport assessment and supplementary transport note which together consider the potential effects of the proposed development on highway capacity and safety. Following the receipt of comments of NYCC Highways Authority in respect of planning application 21/00871/MFUL, the applicant has prepared a supplementary transport note and revised the proposed access location to overcome the concerns of the Highway Authority. This application is made in direct response to those concerns
- 7.22. The assessment describes Malton Road as a two-way single carriageway... approximately 6.5m in width... subject to a derestricted (60mph) speed limit. The assessments finds the public highway to be rural in nature, mainly providing access to sparse commercial properties.
- 7.23. The assessment also finds that, whilst there are edge of carriageway markings intended to discourage parking, there are no waiting/parking restrictions in the vicinity of the junction between the A169 and Upper Carr Lane.
- 7.24. The assessment provides details of the sustainable modes of transport available in close proximity to the site, demonstrating that there is an extensive network of Public Rights of Way in close proximity to the site, and that, whilst there are no dedicated cycling facilities within the vicinity of the site and the national cycle network does not extend in to the area around the application site, it would remain attractive to leisure cyclists, with large parts of the Ryedale District (including areas within the boundary of the North York Moors National Park) located within a 25 minute cycle ride of the site. As described above, the application site is also well served by its proximity to nearby bus stops served by the 840 Coastliner route, with regular stops during weekdays and weekends.
- 7.25. The assessment finds that between 1st January 2015 and 31st December 2019, a total of 6 collisions occurred within the study area resulting in some 13 casualties. The assessment finds that none of those accidents occurred as a result of the operation of the A169/Upper Carr Lane junction and that the proposals should not have a detrimental impact on the local transport or affect the safety of pedestrians and cyclists.
- 7.26. The assessment considers the likely number of trips to be generated by the proposed development based on information obtained from the TRICS database. The database has highlighted three developments which are considered comparable to the proposals set out in this application. Details of those sites are provided in the assessment; however, it should be noted that they provide a mixture of tent and touring caravan pitches. In contrast, Upper Carr Holiday Park is an owners only static caravan park and the site will not generate the caravan movements identified in the TRICS database.
- 7.27. Nevertheless, the assessment finds that, during peak holiday months in the summer, the proposals would be expected to add an additional nine two-way vehicle trips during the AM peak hour and up to 29 additional two-way vehicle movements during the PM peak hour. However, the assessment finds that this would not result in a significant impact upon the local highway network.
- 7.28. Considering advice received from NYCC Highways, the assessment has also considered the suitability of the proposed new access onto the A169 to accommodate the additional demand generated by the proposed extension to the existing holiday park.
- 7.29. Speed survey was undertaken to the north and south of the proposed access along the A169 in September 2021. This has confirmed that the critical speed measurements on the northbound and southbound carriageways are 51.0mph northbound and 52.0mph southbound. Based upon these speeds, a stopping sight distance of 2.4m x 160m is required

to achieve a satisfactory junction design. Drawings included with the supplementary transport note demonstrate that the required visibility splays can be achieved without a need for the acquisition of third-party land.

- 7.30. As a result, the Assessment finds that the proposed extension to Upper Carr Holiday Park would not have an unacceptable impact upon the operation of the local highway network.

8. Planning Assessment

- 8.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that *“where in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material consideration indicates otherwise.”*
- 8.2. The National Planning Policy Framework (NPPF) was published in July 2021 and sets out the government’s planning policies for England and how these are expected to be applied. Paragraph 2 of the National Planning Policy Framework (NPPF) reiterates that applications must be determined in accordance with the development plan unless material consideration indicate otherwise. Paragraph 2 also confirms that the NPPF is a material consideration in planning decisions.
- 8.3. The development Plan comprises the policies contained within the Ryedale Plan - Local Plan Strategy adopted 5th September 2013 and the Ryedale Plan - Local Plan Sites Document adopted 27th June 2019.
- 8.4. The relevant policies of the development plan and other material considerations are reproduced at Appendix 11 of this report and this section considers the planning merits of the proposed development in the context of those policies.

Sustainable Development

- 8.5. Paragraph 7 of the NPPF identifies the purpose of the planning system to contribute to achieving sustainable development. Paragraph 8 goes on to define the overarching objectives of the planning system by which sustainable development would be achieved. These objectives are:
- Economic;
 - Social; and
 - Environmental.
- 8.6. This presumption in favour of sustainable development is replicated in the development plan through policy SP19 of the Local Plan Strategy which seeks to support sustainable development proposals unless material considerations indicate otherwise.
- 8.7. The following sections set out how the proposed development would contribute to the stated objectives of sustainable development.

Economy

- 8.8. The economic aim of the NPPF seeks to help build a strong, responsive and competitive economy to support growth and innovation.
- 8.9. Whilst not directly relevant to the determination of this application, a Written Ministerial Statement (WMS) published on the 14th July 2020 following the easing of lockdown restrictions emphasised the contribution of the caravan and holiday park industry to the UK economy. The Secretary of State for Housing and Local Government commented that *“the majority of UK businesses closed in March 2020, including caravan and holiday parks. This has had a significant impact on the financial viability of over 2,200 businesses in this sector that employ around 46,000 staff. These parks are a mainstay of their local economies, providing employment and supporting local services and businesses.”*

- 8.10. Guidance on the Visit England website acknowledges the important part that sustainable rural tourism and leisure development plays in a prosperous rural economy but has specific considerations to take into account.
- 8.11. Research undertaken on behalf of Visit England (along with Visit Scotland and Visit Wales) and Ryedale District Council demonstrates how the tourist economy continues to make a very significant contribution to both the UK economy as a whole and more locally to the towns and villages in Ryedale.
- 8.12. The Visit England research found that in 2019 some 122.8m overnight tourist trips were made in England, Scotland and Wales generating a spend of some £24.7billion.
- 8.13. With specific reference to England, 2019 saw just over 99 million trips made. Caravan and camping holidays generated over 10 million trips, over 10% of total trips in England across the year. Of these camping and caravan trips, over 14% were by static caravan owners (nearly 1.5 million trips).
- 8.14. The report finds that nearly £11 billion pounds was spent on holiday trips during 2019. Almost 15% of that total, just over £1.6 billion was spent on caravan or camping trips with almost 11% or £174 million being spent by static caravan owners.
- 8.15. It is therefore clear that Holiday Parks such as Upper Carr continue to play an important economic role in their communities, a fact reflected in the text of the WMS. This is likely to be strengthened by the current Covid-19 pandemic. Restrictions on international travel have already seen an increase in demand for UK holidays following the easing of lockdown restrictions and static pitches across the applicant's holiday parks.
- 8.16. Historic evidence also demonstrates an increase in UK holidays during periods of economic contraction, this is demonstrated by the Visit England report which shows how overseas holidays accounted for less than 40% of all GB holidays following the financial crisis of 2008/2009 rising to around 45% of all holidays in 2018. It is therefore highly likely that 2021 and subsequent years will see an increase in demand from GB residents for UK holidays.
- 8.17. Data published by Tourism South East Research on behalf of Ryedale District Council estimates that the total value of tourism activity in Ryedale in 2019 was around £378 million and supported around 6,486 full time equivalent jobs (the research estimates that this equates to 8961 actual jobs), 39% of total jobs in the District.
- 8.18. The proposed development would secure the longer-term employment of the existing 2no. staff at the site and lead to the creation of a further 7 no. jobs as well as supporting the administrative and ancillary posts employed at the applicant company's head office in Scarborough.
- 8.19. Policy SP8 of the Local Plan Strategy also recognises the contribution that tourism makes to a sustainable economy. The supporting text to Policy SP8 recognises that it is essential that the District's tourism industry can continue to develop in a sustainable way but that in a rural area such as Ryedale, new facilities cannot always be directed to the most sustainable locations. The text also recognises that it is important that new facilities strike a balance where their scale, nature and location can be accommodated.
- 8.20. The supporting text acknowledges the growth in demand for year-round availability of holiday parks and, in principle supports that form of development, subject to occupancy conditions. This position will, no doubt, have been reinforced by the recent WMS referred to at para 8.9.
- 8.21. Policy SP8 itself seeks to encourage sustainable tourism in Ryedale by supporting, amongst other things, year-round tourism (subject to occupancy restrictions) and the role of Pickering, Helmsley and Thornton-le-Dale as key destinations and gateways to the tourist attractions of northern Ryedale.
- 8.22. In the wider open countryside, policy SP8 supports the extension of existing static caravan sites where they can be accommodated without unacceptable visual impact.

- 8.23. By any measure, the proposed development clearly meets the economic aim of sustainable development set out in the NPPF and is, as a matter of principle, supported by Policy SP8 of the Local Plan Strategy.

Society

- 8.24. The social aim of sustainable development seeks to support strong communities, fostering a well-designed and safe built environment with access to services and open spaces, supporting the community's health, social and cultural well-being.
- 8.25. The location of the proposed development allows for the development of an attractive, well-designed facility which would provide an appropriate level of amenity to holiday home owners. The Holiday Park is easily accessible by means other than the car, located near local bus stops which are frequently serviced by services travelling to and from local service centres including Pickering and Malton, where additional train services are available.
- 8.26. Drawing UC_L_005 which forms Appendix 5 of the accompanying landscape assessment shows the network of public footpaths and bridleways surrounding the application site. Footpath access is clearly available from the application site to both Pickering and Thornton-le-Dale along with the nearby Flamingo Land. Importantly the public rights of way network provides direct access from the application site into the North York Moors National Park, the boundary of which is situated some 1.5km to the north east.
- 8.27. Nevertheless, the Visit England Guidance previously referred to in the NPPF recognises that access is an important issue to ensure the success of tourism sites. It also recognises that many small-scale rural tourism developments are car dependent, but that the use of the car does not make a proposal unsustainable.
- 8.28. The transport statement accompanying the planning application demonstrates that, whilst the current access has operated safely, the proposed new access can also be operated safely and without giving rise to capacity issues on the public highway. However, the new access location would bring about significant improvements to visibility for those vehicles leaving the site, together with improved forward visibility along the A169 as vehicles turn into the application site.
- 8.29. The social aims of the NPPF are reflected in Policy SP16 of the Local Plan Strategy which seeks to create high quality places which are accessible, well integrated and, amongst other things, protect amenity and well-being. Policy SP20 also seeks to control the character, design and safety of new development, preventing the occupation of any holiday accommodation as a person's primary residence. The existing site already operates on this basis and the proposed development, whilst offering year-round holiday accommodation, would be subject to the same restrictions. The proposed development has been designed to maximise amenity both for local residents and occupiers of the proposed Holiday Park. Inclusion of a designated recreation area, creation of varied habitats within the overall scheme, including wetland, hedgerow and grassland and commitment to maintaining screening boundaries all contribute to the provision of a well-designed development which respects the character of the area and seeks to preserve the amenity of local residents.
- 8.30. Paragraph 111 of the NPPF provides planning authorities with a clear direction that *"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact upon highway safety, or the cumulative impacts on the road network would be severe."* The Transport Assessment accompanying this application demonstrates that the proposed new site access would provide satisfactory visibility in both north and southbound directions, the proposed new junction would operate at well below capacity and the proposed development would give rise to less than 30 two-way peak hour vehicle trips. The assessment finds that, on this basis, the proposed development would not have a significant impact on the operation of the local highway network.

- 8.31. The application site is located some 1.5km to the south of the North York Moors National Park. The purposes of National Parks are twofold; to conserve and enhance natural beauty, wildlife and cultural heritage and to promote opportunities for the public's understanding and enjoyment of the special qualities of the Parks. The application site serves the purposes of the National Park as it is located outside the Park boundary yet is easily accessible to the National Park through the extensive network of Public Rights of Way, thereby providing opportunities for the public enjoyment of the special qualities of the Park whilst conserving natural beauty, wildlife and cultural heritage.
- 8.32. The proposed development complies with the transport requirements of paragraphs 110 and 111 of the NPPF, the detailed requirements of the adopted Tourism Policy SP16 and the Access, Parking and Servicing requirements of Adopted Policy SP20 of the Local Plan Strategy. The proposed development thereby plays an important social role in sustainable development, complies with and supports the stated objectives of the NPPF.

Environment

- 8.33. The NPPF defines the environmental objective of sustainable development as contributing to protecting and enhancing our natural, built and historic environment, making effective use of land, helping to improve biodiversity and mitigating to climate change. All these matters are addressed below.
- 8.34. In respect of designated and non-designated heritage assets, Appendix 13 provides an extract from the government's MAGIC website and reference has been made to the Heritage Gateway website, both show that it is unlikely that the proposed development would have a significant impact upon built heritage.

Biodiversity

- 8.35. Paragraph 180 of the NPPF sets out those principles which must be applied when determining planning applications including preventing development which would give rise to significant harm to biodiversity which cannot be adequately mitigated, protecting Sites of Special Scientific Interest, protecting irreplaceable habitats and securing measurable net gains for biodiversity. Many of these requirements are replicated in Policy SP14 of the Local Plan Strategy including the need to provide a net gain in biodiversity.
- 8.36. The submitted Preliminary Ecological Appraisal, along with the subsequent great crested newt survey report demonstrate that the proposed development would not have a significant impact upon biodiversity. Regarding great crested newts, the report proposes a method of working which would minimise impacts upon that protected species and recommends the creation of a minimum of 0.5ha of optimum terrestrial and aquatic great crested newt habitat.
- 8.37. It should be noted that the Environment Bill has yet to be enacted and the proposed statutory requirement to support all applications with the DEFRA Biodiversity Net Gain Metric 2.0 does not yet apply. This was recently reinforced by the Planning Inspector in Planning Appeal reference 3251121 who, at paragraph 42 of his decision, attached greater weight to the adopted development plan. The proposed development thereby complies with the requirements of both the NPPF and Policy SP14 of the Local Plan Strategy regarding both the provision of measurable net gains and the protection of biodiversity generally.
- 8.38. The accompanying ecological survey reports demonstrate that the proposed development conserves and protects biodiversity and the creation of appropriate great crested newt habitat would help to improve biodiversity.

Flood Risk

- 8.39. Paragraph 163 of the NPPF requires planning applications to ensure that development does not increase the risk of flooding downstream and, where appropriate, is supported by a site-specific flood risk assessment.

- 8.40. Paragraph 167 goes on to require the siting of development in the lowest areas of flood risk, development that is designed to be flood resilient, incorporates sustainable drainage systems, safely manages residual risk and includes an emergency plan providing safe access and escape routes.
- 8.41. It is acknowledged that parts of the application site are in an area identified as being at risk of flooding from rivers and the sea. This application is therefore supported by a suite of documents which, together, assess the flood risk of the site, consider the likelihood of increasing flood risk elsewhere, propose appropriate mitigation measures and apply the requirements of planning practice guidance in respect of the Sequential and Exception Tests.
- 8.42. The flood risk assessment sets out in detail the likely flood scenarios at the application site, proposing that all static caravans should be securely tethered to the ground and floor levels should be at around 600mm above ground level. The surface water drainage strategy proposes a means of managing surface water at the site such that run-off rates would not be increased above the green field rate of run-off.
- 8.43. In their pre-application response, Ryedale District Council incorrectly considered the proposal to fall within the highly vulnerable flood risk category as “Caravans, mobile homes and park homes intended for permanent residential use.”. This classification is incorrect. The current Upper Carr Holiday Park is subject to a condition restricting occupancy and it is expected that, should the development proposed in this application be approved, a similar condition would be applied. The proposed development therefore falls within the “more vulnerable” classification of flood risk as “*Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan.*” A Flood Evacuation Management Plan is provided at Appendix 4 of this Statement.
- 8.44. More vulnerable developments are considered acceptable in flood risk zones 2 and 3 subject to the Exception Test.
- 8.45. Policy SP17 of the local Plan Strategy mirrors the approach set out in the NPPF, requiring the management of flood risk and water resources and the undertaking of a sequential, risk-based approach to the consideration of development proposals and the application of the Exception Test where necessary.
- 8.46. Appendix 3 of this statement comprises a technical note on consideration of the Sequential and Exception Tests. The Technical Note considers the nature and scale of the proposed development, the designated flood risk at the site and applies the Sequential and Exception Tests in accordance with Planning Practice Guidance.
- 8.47. The NPPF requires that, for the Exception test to be passed, applications should demonstrate that both:
- The development would provide wider sustainability benefits to the community that outweigh the flood risk; and
 - The development will be safe for its lifetime taking account of the vulnerability of its user, without increasing flood risk elsewhere, and, where possible will reduce flood risk overall.
- 8.48. Appendices 1 and 2 of this statement provide a flood risk and drainage assessment. Together with Appendix 4, those documents demonstrate that the proposed development is safe for both users and the wider community, providing adequate management of the flood risks on site and ensuring that flood risk is not increased elsewhere.
- 8.49. In respect of the wider sustainability benefits of the proposed development, this statement and accompanying documents clearly demonstrate the sustainability of the proposed development in respect of the local economy, biodiversity, access and landscape considerations. The economic benefits of the proposed development are set out in detail at paragraphs 8.5-8.21 of this Statement. Taken with the pragmatic approach endorsed by

Planning Practice Guidance regarding the extension of existing sites, this Statement and accompanying appendices demonstrate that the proposed development passes the Exception Test and complies with the policy requirements of the NPPF and Policy SP17 of the Local Plan Strategy.

Landscape

- 8.50. Paragraph 174 of the NPPF seeks to protect and enhance valued landscapes and recognises the intrinsic beauty of the countryside. Paragraph 176 attaches great weight to conserving and enhancing scenic beauty in National Parks and other areas which have the highest landscape status. Policy SP13 of the Local Plan Strategy seeks to protect the quality, character and value of Ryedale's landscape including the setting of the North York Moors National Park. Policy SP16 requires development proposals to create high quality places which, amongst other things, reinforce local distinctiveness, protect amenity and promote well-being and incorporate appropriate landscaping features to enhance the setting of the development.
- 8.51. Appendix 8 of this statement comprises a landscape assessment which considers the potential landscape and visual impacts of the proposed development. The assessment identifies that the application site lies outside those areas designated for their landscape. But specifically includes consideration of impacts from Public Rights of Way located within the National Park area.
- 8.52. The landscape assessment considers the landscape character of the application site and surrounding area, considering it to be of medium value with a medium level of susceptibility to the type of development proposed in this application. The sensitivity of the landscape is therefore judged to be Medium.
- 8.53. The landscape assessment finds that the proposed development would not be prominent in the landscape, resulting in a Low magnitude of change. With a Medium sensitivity and Low magnitude of change, the assessment finds that the overall impacts upon the landscape would be Minor adverse.
- 8.54. The visual impact assessment of the development considers the impact of the proposed development on the visual amenity of the surrounding landscape. A Zone of Theoretical Visibility model is included with the Assessment which demonstrates that views into the site are not available from the west and that only scattered views of the upper part of the site area available from the south and east. However, the ZTV confirms that the site may be visible from elevated south facing slopes to the north, which fall within the North York Moors National Park boundary.
- 8.55. Field survey was undertaken to confirm these views across eight photo viewpoints, three of which were located within the National Park Boundary. The visual assessment concludes that those viewpoints closest to the application site are of Medium or Low Sensitivity to change and, following establishment of landscape mitigation measures and muted colours for caravans, predicted visual effects would range from Minor beneficial to Negligible. Those highly sensitive viewpoints within the National Park Boundary were assessed to have a Negligible magnitude of change and the post construction effects were considered to be Minor beneficial.
- 8.56. The assessment also considers the potential impact on residential amenity for those properties closest to the application site and finds that the potential impacts upon Lilac Cottage to the west and Brookside House to the south west would be negligible as there are no views to the application site from either of these properties. Willow Dene, to the south of the application site, has first floor views to the application site and it is predicted that that a Minor effect would be experienced from those rooms as a result of setting back the existing hedgerow and relocated access.
- 8.57. It is clear therefore that the proposed development could take place without giving rise to significant effects upon the landscape and visual amenity, nor would the proposed

development affect the setting of the National Park. The proposed development therefore complies with the requirements of Policy 170 of the NPPF and the detailed requirements of policies SP13 and SP16 of the Local Plan Strategy.

- 8.58. This assessment demonstrates that the proposed development supports the stated objectives of the NPPF with regard to the economic, social and environmental roles of sustainable development, would make a significant contribution to the sustainable development aims of the NPPF and complies with, and is supported by, the policies of the adopted development plan. The proposed development therefore comprises sustainable development.

9. Summary and Conclusions

- 9.1 This planning application proposes the change of use of land and establishment of an extension to an existing Holiday Park to provide a further 127 new units (a net increase of 102 units over existing permissions) and ancillary works to establish a new access, internal access roads etc.
- 9.2 Development such as that proposed in this application is supported by Policy SP8 of the adopted Ryedale District Council Local Plan Strategy which encourages sustainable tourism which minimises its environmental impact and explicitly supports extensions to existing facilities in the open countryside which can be accommodated without an unacceptable visual intrusion and impact on the character of the area.
- 9.3 This application clearly demonstrates that the proposed development is sustainable when considered against the objectives of the NPPF and incorporates appropriate mitigation measures which would effectively mitigate any potential environmental impacts. A comprehensive assessment of the landscape and visual impacts of the proposed development clearly demonstrate that the proposed development could be undertaken without giving rise to significant landscape impacts or visual intrusion, even when considered from the high value landscape of the North York Moors National Park to the north.
- 9.4 This Statement and accompanying reports demonstrate that the proposals set out within the application fall within the definition of sustainable development and there are no other material factors which would indicate that the proposal conflicts with any policies of the NPPF or the adopted Development Plan. On that basis, and in accordance with the NPPF, the proposal should be approved without delay.