

NYMNPA

12/03/2021

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North York Moors National Park Authority
The Old Vicarage
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HELMSLEY
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EDWARDSON
ASSOCIATES

Planning & Diversification Consultants

05 February 2021

Our Ref: WEL.J 2021.01

FULL PLANNING APPLICATION – PLANNING & DESIGN & ACCESS STATEMENT

Dear Mrs Saunders,

Change of use of land to permit the siting of timber lodges (enhanced planting scheme) at Runswick Bay Caravan Park, Hinderwell Lane, Runswick Bay, Saltburn-by-Sea TS13 5HR

1.0 Introduction

- 1.1 Please regard this letter as comprising a supporting planning and design and access statement in connection with the above proposals
- 1.2 This application comprises an amended scheme to seek to address a previously refused application. Application reference NYM/2020/0203/FL was refused in May 2020 stating two reasons for refusal.
- 1.3 This current amended scheme proposes the change of use of land to accommodate the siting of 6 high quality timber lodges and importantly proposes enhanced planting to minimise further views from the Cleveland Way. Furthermore, although the proposals would result in the loss of a number of existing touring caravan pitches from the site, to compensate for this loss, it is proposed to create an additional number of touring caravan pitches at the applicant's other holiday park nearby – Serenity Camping, Hinderwell.
- 1.4 There have been a number of significant changes since the original application was submitted. We consider that the amended scheme addresses the reasons for refusal and there are other material planning considerations to further support this scheme.
- 1.5 We have also submitted a pre-application enquiry to the Authority (Reference NYM\2020\ENQ\16944). In its response dated 11 September 2020, the Authority stated the following: -

"In my view, the planting scheme proposed would screen the site to a much greater extent, but this should be undertaken prior to any revised application being submitted."

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and

“ . . . the additional information regarding (compensatory provision of) additional pitches elsewhere is welcome.”

and

“ . . . a better arrangement would be achieved if the numbers were dropped to 6”

and in conclusion

“Having considered all of the above, I would advise that if the planting has been undertaken in advance, a revised scheme of 6 units would be likely to receive favourable consideration”.

1.6 We have listened to this advice. The additional screen planting has been implemented on the ground. Furthermore, the proposed layout has been amended to reduce the number of lodges to 6. As a result, it is considered that the scheme comprises a suitable, small scale (as defined in the now Adopted Local Plan (2020), sustainable tourism development which accords with the National Planning Policy Framework and the Development Plan.

1.7 Please note that a concurrent planning application will be submitted for the siting of the compensatory touring caravan/camping pitches at Serenity Camping, Hinderwell. The two applications can be considered in conjunction with one another.

2.0 Application Particulars

2.1 This application comprises of the following plans and particulars: -

- Drawing 001 – Location Plan (Runswick Bay Caravan Park)
- Drawing 002 – Site Plan & Sections as Existing
- Drawing 101 – 101 Site Plan & Sections as Proposed
- Drawing 102 – Lodge 50 x 22 as Proposed (Indicative only)

3.0 Site Location and Description

3.1 The application site is located within the North York Moors National Park. It is also located within the open countryside and outside of Flood Zones 2 and 3. The camping area is relatively well screened by topography and has permission, we understand, to operate year round. Following the advice and recommendations set out in the Authority’s pre-application response dated 11 September 2020 (Reference NYM\2020\ENQ\16944), additional landscaping screening has been undertaken. This combined with the design and appearance and proposed careful siting of the lodges will minimise the visual impact of what is already a camping and touring field.

3.2 The timber style lodges are proposed to be located in an existing area of Runswick Bay Caravan Park used for tents and touring caravans. The site currently has permission for 55 lodges and has evolved over time from a camping to a high quality lodge style tourism business (all through the planning process). Previous applications of this nature have been supported by officers. The existing access and services would be utilised including all mains services.

4.0 The Proposals (Design and Access Statement)

Use

- 4.1 The application proposals comprise the change of use of land to accommodate the siting of 6 high quality timber style lodges with associated within-site access and parking. All lodge units meet the definition of a caravan within the meaning of the Caravan Sites Control of Development Act 1960 and the Caravan Sites Act 1968.
- 4.2 This application seeks to address the previous reasons for refusal and address market demand for high quality lodges in a highly attractive tourist location where holiday use already exists. This type of unit appeals to families with young children and people of all ages and sidesteps the need to haul/erect/dismantle tents sometimes in adverse weather.

Amount

- 4.3 The application site area is 0.53 hectares. The application proposes the use of land for the siting of 6(no.) lodges. 12(no.) off-street car parking spaces are proposed, two dedicated for each lodge.

Scale

- 4.4 This is a small scale tourism proposal.

Layout

- 4.5 The layout on drawing number 101 shows that lodges can be accommodated within the application site boundary and nestled within enhanced landscaping proposals. The lodges will be laid out in accordance with Scarborough Borough Council's site licence conditions for touring / caravan sites with a minimum spacing of 6 metres between units.

Appearance

- 4.6 Drawing 102 shows indicative floorplans and elevations for the proposed lodge units (for illustrative purposes only). All units are capable of meeting the definition of a caravan as described within 'The Caravan Sites and Control of Development Act 1960' and the 'Caravan Site Act 1968.' Having said that, the units will display the appearance of lodges with vertical or horizontal clad timber boarding or green coloured boarding material. The roof material is to comprise composite metal sheets coloured dark grey.

Landscaping

- 4.7 We refer you to drawings 002 and 101 for comprehensive details of the existing and proposed landscaping (including planting and maintenance regimes). Following on from the previous planning refusal and pre-application enquiry, additional screen planting, including 2m high rush fencing has been undertaken around the internal perimeter of the site. This supplements the pre-existing outer perimeter boundaries. A new 1.75 – 2.0m high Beech hedge has been planted along the western side of the site along the existing post and rail fence. Inside this, and all around the internal perimeter, a high density shelter belt of Pinus Sylvestris, Holly and native deciduous trees comprising Sorbus Aucuparia, Betula Pendular and Carpinus Betula has been planted. This includes some larger pine. Furthermore, the existing, substantial hawthorn hedge on the northern boundary acts as an important visual and wind shelter belt for the new

planting within. It has already had some supplementary Hawthorn and Blackthorn added in the few areas where there have been some gaps. This new planting represents a significant, material change compared to the previously refused application and should ensure that the proposals will be acceptable in terms of their landscape character and visual amenity impacts.

Access

- 4.8 Access to the site is to be taken from Hinderwell Lane to the south west using the existing well-established vehicular access serving the park. Once within the site is proposed modify the existing access arrangement into the caravan and camping field and extend a small stretch of new tarmac road.

Drainage

- 4.9 Foul water from the lodges will connect to the existing site system. Surface water will drain to ground around each lodge unit.

5.0 Key Considerations and Changes Since Previous Submission

The North York Moors National Park Local Plan (2020) Adopted 27 July 2020

- 5.1 The new Local Plan was adopted in July 2020 at the National Park Authority AGM. The former NYM Local Development Framework is no longer the Park's up to date Plan and therefore Development Plan Policy 16 and reason 1 of the previous refusal are no longer relevant.
- 5.2 We consider that this is a material planning consideration as the new Local Plan (2020) and in particular Strategic Policy J – Tourism and Recreation has changed some key policies and those quoted in this application.

Small Scale Expansion

- 5.3 Runswick Bay Holiday Park has planning permission for 55 lodges at present, plus 22 touring/tenting pitches. We consider that the reduction in the number of lodges proposed down to 6 units addresses this concern. Policy UE2 – Camping, Glamping, Caravans and Cabins states that development will only be permitted for small scale holiday accommodation.
- 5.4 Explanation 5.11 and 5.12 of the Local Plan 2020 explain small scale and goes on to explain that scale may vary according to the type of accommodation and sensitivity of its location. We consider that as this proposal would reduce numbers in total on this site there is no increase in numbers – rather a change in accommodation on offer.
- 5.5 The proposal seeks to relocate the touring and camping element to another site (Serenity, at nearby Hinderwell) which is better served with facilities and can be managed more effectively as a business.

Located within an Established Area of Woodland

- 5.6 Former Development Policy 16 of the NYM LDF required development to be located within a woodland setting.
- 5.7 Policy UE2 (Local Plan 2020) states that **“in order to respect the sensitivity of the landscape character type all sites must be screened by existing topography, buildings or adequate well established vegetation which is in the applicant’s control..”**
- 5.8 The additional details submitted show a site section and how the topography of the land screens the site. The additional landscaping already undertaken following the planning refusal and pre-application advice, (combined with additional proposed planting), is intended to improve the existing screening.
- 5.9 The topography of the land and adjoining fields provide good and natural screening from the Cleveland Way and we hope the section provided illustrates this.

More Intrusive form of Development

- 5.10 We accept that the nature of touring and camping sites can be intermittent and less permanent in nature. We do believe there is a case here, that the proposed cabin style lodges can be controlled in terms of materials, colour, size and location. The timber finish proposed will be less prominent in the landscape than the mixture of brightly coloured tents, awnings and touring caravans that come with camping sites.
- 5.11 It is also worth highlighting that there is also a 12 month season approved so presence of camping is permitted year round and throughout the winter.
- 5.12 We also consider that the already undertaken and proposed additional landscaping will bring environmental improvement to the site.

Increase Pressure on the Authority to Release other sites for Tents and Tourers

- 5.13 We acknowledge that this is a concern of the National Park and there is a sensible and strong policy argument to safeguard existing camping sites.
- 5.14 The previous application did not explain that the applicant also owns and operates Serenity Camping in nearby Hinderwell.
- 5.15 Serenity is a camping site a mile down the road at Hinderwell. This site has capacity to accommodate the touring and tents from Runswick Bay. A separate, concurrent planning application is being submitted to provide assurance of this compensatory provision.
- 5.16 Serenity Camping is better equipped to provide camping facilities for visitors to the National Park. It is arguably better located for services as the village has more available within walking distance. The onsite camping facilities are also sufficient and provide family and disabled facilities.
- 5.17 The relocation of the camping to Serenity and introduction of additional lodges at Runswick would make both businesses easier to manage and operate in turn.

6.0 National Planning Policy Framework

- 6.1 The updated Framework was published in 2019 and is a material planning consideration.
- 6.2 Paragraph 8 of the NPPF sets out that there are 3 dimensions to sustainable development: economic, social and environmental, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives).
- 6.3 The proposals accord in particular with Paragraph 83 of the NPPF, which states that planning decisions should enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings, the development and diversification of agricultural and other land-based rural businesses; and sustainable rural tourism and leisure developments which respect the character of the countryside.

7.0 Tourism Sector Economy

- 7.1 The Tourism Alliance in their recent UK Tourism Statistics 2016 Report found that:
- nationally Tourism employs a quarter of a million people.
 - the value of Tourism to the UK Economy in 2014 was £121.1 billion (7.1 %) of UK GDP.
 - total revenue from Tourists in 2015 was estimated as £127.4 billion.
 - since 2009, tourism employment has increased at almost double the rate of the rest of the UK labour market.
 - the tourism sector is the UK's third largest employer, accounting for 11.6% of total employment.
 - A new full time equivalent tourism job is created with every £54,000 increase in tourism revenue.
- 7.2 At a Regional level Tourism in Yorkshire is worth £7 billion annually with 216 million visitors to the region each year. In 2014 in the Yorkshire Region 119, 630 people were employed in the Tourism sector approximately 6.7% of the UK's employment sector.
- 7.3 The Executive summary of the 'Report on the Economy of the North York Moors National Park (2015)' states:
- 'The major economic sector is tourism and recreation, estimated to support some 4,000 Full Time Equivalent (FTE) jobs in the park and up to 7,800 in the wider area.
 - A major component of the Park's economy relates directly and indirectly to the activities and spending of visitors and of leisure and recreation pursuits.
 - Tourism is worth some £416 million to the local economy and supported some 4,000 FTE jobs in the Park; some 7,800 in the wider area.'
- 7.4 The current proposal will have important and significant multiplier effects for other associated local businesses and the wider economy. This is a significant material planning consideration. The application proposals will safeguard existing jobs and create additional jobs for the local construction industry and allied trades, landscape gardeners, cleaners and those employed in the holiday and hospitality industry, and others. Job creation should be regarded as a further significant material planning consideration.

8.0 Conclusion

- 8.1 The proposal seeks to address previous concerns and is a small scale proposal consisting of the change of use of land to accommodate high quality timber lodges and associated parking.
- 8.2 The proposals be supported by local plan polices and the policies of the NPPF and will further support the viability of both businesses. The contribution of the tourism sector to the local economy is significant. Policy UE1 – Location of Tourism and Recreation Development supports tourism and recognises existing business may need to expand or diversify.
- 8.3 Policy UE2 – Camping, Glamping, Caravans and Cabins is also key and in this instance this proposal is for a cabin/chalet development. We hope that the amended scheme addresses previous concerns over impact on the character of the landscape and consider that this change in Policy and woodland setting requirement further supports this proposal.
- 8.4 It is hoped that officers will be able to reconsider this amended proposal favourably. The recent pre-application response indicated that officers would be able to support the changed scheme if the additional landscaping is undertaken and the scheme is reduced to 6 lodges. We have listened to this advice and the submitted application incorporates these recommendations. Please do not hesitate to contact us should you require any additional information or clarification on any matters.

Yours sincerely

EDWARDSON ASSOCIATES

