

Your ref:

Our ref: NYM/2022/0634

Date: 06 October 2022

Dear Mr Cox

Application for variation of conditions 1 (material amendment), 2, 3, 4, 5, 7 and 11 of planning approval NYM/2018/0681/FL to allow the temporary use of Ladycross Caravan Park as an accommodation park for Anglo American workers for the duration of the shaft sinking stages of the Woodsmith Project (estimated to be up to five years). The proposal comprises the regularisation of the 'as-built' layout to the south west of the site, temporary siting of two person cabins on each of the 189 pitches with associated infrastructure, provision of a temporary welfare facility across six lodges, canopy to existing toilet block for use as bus drop off/pick up area, cycle store and bin store together with retention of four privately owned lodges and private house for continued use by caravan site operator at Ladycross Plantation Caravan Park, Egton

I refer to the above application and set out below a number of queries and requests for clarification. These have been compiled following initial review of the proposals and consideration of consultation responses received to date. It may be that further information or clarification on other matters will be required in due course.

- 1) The application statement refers to a need to provide further accommodation of a more consistent standard within a sustainable radius of the (mine) development sites. The focus in the Transport Statement is on the movement of shift workers to the Woodsmith site specifically and this has been indicated in subsequent discussions. However, it would be helpful if clarification could be provided on the intended work location of all occupiers of the proposed temporary accommodation park.
- 2) On the assumption that the main or sole focus of the accommodation park would be to provide accommodation for those employed at the Woodsmith site, it would be helpful if further explanation could be provided of the factors which, in the applicant's view, determine the 'sustainable' radius within which accommodation needs to be provided. Specifically, it would also be helpful if you could clarify whether consideration has been given to identifying temporary accommodation solutions outside the National Park (or, potentially, other locations within the National Park) and, if relevant, why these are not being pursued.
- 3) The application statement indicates that Anglo American currently utilises existing accommodation totalling around 250 beds, some of which is established holiday accommodation. It is also understood from subsequent discussion that, should the application be successful, the developer would relinquish some of this. It would be

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helpful if further clarity could be provided on the expected number of tourism beds in the National Park that would be released back into tourism use if the development were to proceed.

- 4) Related to the above point, the application statement also suggests that as 'the Ladycross Caravan Park currently only provides a very small proportion of the total supply of caravan pitches within the National Park, there will continue to be a healthy supply of alternative pitches available during the site's temporary use as an accommodation park.' Is the applicant in a position to provide any additional detail on this matter, including on the distribution within the National Park of alternative capacity relative to the application site?
- 5) There are some apparent discrepancies in the application documents on the number of cabins to be provided and workers to be accommodated. The application statement indicates that the proposals seek to provide two person cabins in the place of the 189 pitches which currently exist or are permitted, and that two cabins would be provided on some of the larger pitches. The Transport Statement (para. 6.1.1) models construction traffic generation on the basis of 180 cabins being brought on to the site but a maximum of 400 workers being accommodated, and the proposed Site Plan submitted with the application also indicates a total of 180 cabins being provided. This latter figure would equate to a maximum occupancy of 360 workers. It would be helpful if this could be clarified and the Transport Statement or other application documents revised if necessary.
- 6) The application drawings indicate that lodges are already installed on 5 pitches (outside the area to be fenced off to separate out the existing dwelling and lodges in private ownership). Would these existing lodges be retained and repurposed for worker accommodation or left vacant pending reinstatement of the site back into tourism use?
- 7) The application drawings indicate a proposal to construct a new internal access link to serve the lodges in private ownership. How would this be constructed/surfaced and would any tree removal or other vegetation clearance be required?
- 8) It would be helpful if greater clarity could be provided on the expected frequency and timing of shift changeovers (ie 'work trips'). The Transport Statement (para. 5.2.1) states that 'at peak occupation the park could accommodate up to 400 employees. These employees would typically be expected to work a notional three shift pattern, with three teams of 133 'on shift' at Woodsmith Mine and the remaining teams at home.' This approach appears to form the basis for the predicted 'work trips' movements set out in Table 5-1 of the Transport Statement, which refers to 'morning' 'day' and 'night' shifts. However, it is understood from subsequent discussions that a two shift pattern is likely to be utilised. It would be helpful if this could be clarified and, if necessary, the Transport Statement updated accordingly. Related to this point, it would also be helpful if information could be provided on the timing of bus movements to transport workers from/to the accommodation park at the start and end of work shifts, based on the shift patterns expected to be used.
- 9) The Transport Statement (para. 5.2.9) also indicates that 'during the shift rotation, it is forecast that on any one day, up to 133 employees could arrive to start their shift rotation at Woodsmith Mine and 133 could depart having completed their shift rotation.' It would be helpful if further information could be provided on the likely

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frequency of shift rotations (ie 'home trips') – for example how many times per month would it be expected that a shift rotation would occur and would such movements only occur during normal daytime hours?

- 10) The Transport Statement compares projected vehicle movements associated with the proposed accommodation park, with projected existing levels of traffic associated with the existing Caravan Park at assumed full occupancy, using the TRICS database. Is any information available on estimated recent actual levels of occupancy of the site, including the typical range of occupancy across the summer and winter assumed maximum and minimum levels?
- 11) The forecast traffic movements do not appear to allow for removal of the worker cabins and any internal fittings at the end of the proposed temporary use. It would be helpful if revised figures could be provided to allow for this.
- 12) The highways authority has asked for clarification on whether bus movements to transfer staff to and from the mine and accommodation park would use the previously agreed route for construction traffic to the mine, ie A171 through Whitby and Hawsker then the B1416 and how this would be managed and controlled. It also notes that there would be coach trips to and from the accommodation park and the transfer location and whilst the route those trips could take may be unknown at this stage it would be necessary to ensure that an appropriate route is identified and adhered to for these trips as well. Your response to these matters would be helpful.
- 13) Table 1 of the application statement indicates that general site lighting, not essential for safety and security purposes, would be turned off at 2300. Please can you clarify what lighting (ie locations/type of lighting) is considered to be necessary for safety and security purposes in this instance. Related to this, it would be helpful if it could be clarified whether there is any 24h lighting currently in use at the site. On the assumption that the low-level bollard lighting along walkways etc does not constitute essential lighting for safety and security purposes, please can you also clarify whether such lighting would need to be switched on temporarily in any circumstances where shift changeovers are to take place during the night time period (ef 2300-0700).
- 14) Although it is understood that the site would operate on a largely self-contained basis, it would be helpful if it could be clarified whether, and to what extent, it is expected that temporary workers using the site would be likely to utilise any local services or facilities. If it is expected that local services would be utilised, which ones?
- 15) The application indicates that foul and surface water drainage will be managed through existing and, where necessary, upgraded drainage infrastructure. You will be aware that concerns have been raised, in response to publicity on the application, about the potential for the development to lead to further burdens on drainage and water treatment infrastructure in the vicinity. This infrastructure is subject to apparent existing capacity constraints and associated pollution events. Concerns have been raised about the increased risk of harmful impacts as a result of the development now proposed, including on ecological and recreational interests on the River Esk. Although it is noted that the development proposed would not lead to any exceedance of the likely theoretical maximum occupancy of the caravan park site as currently permitted, it is nevertheless likely that the site would be used more

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intensively on a year round basis under the Anglo American proposals, and certainly when compared with actual occupancy of the as yet partially developed caravan park site in recent years. Whilst the Authority has yet to receive a response to consultations with Yorkshire Water and the Environment Agency, it is considered important that more detailed consideration is given to how this concern might be addressed, with more specific proposals for infrastructure upgrades brought forward as necessary.

- 16) It is noted that permission is sought for temporary occupancy of the site for a period of five years. Whilst Anglo American has stated publicly that it will issue a formal update on the development, including timescales, during the course of next year, as the position currently stands a period of five years to allow for completion of shaft sinking appears significantly in excess of that envisaged in previous documents and statements. The applicant may therefore wish to give consideration to whether it may be more appropriate to seek a reduced timescale for the proposed temporary use, with the application amended accordingly.
- 17) As you will be aware, a significant number of public representations have been received on this application (approximately 50 at the time of writing). Collectively, these cover a number of issues of relevance to the application and it would assist the Planning Authority in considering the application if the applicant could provide its views/response to material issues raised.

I look forward to receiving your response to the above matters. Should you wish to discuss in more detail any of the issues raised then please do not hesitate to contact me.

Yours sincerely

Mr Rob Smith
Senior Minerals Planner