

7. FULL APPLICATION - USE OF FIELD FOR FIVE TOURING CARAVANS – LOWER GREENFIELDS CARAVAN SITE, UNAMED ROAD FROM CLIFF LANE TO MAWSTONE LANE, ALPORT (NP/DDD/0720/0613, TS)

APPLICANT: MR GLYN HIND

Summary

1. The application seeks full planning permission for a field next to the existing caravan site to be used to site five touring caravans. The proposed expansion of the existing caravan site would result in significant harm to the landscape character of this area of the National Park. A recent application to site 15 caravans in the same field was refused and dismissed at appeal. The Planning Inspector concluded that caravans in this location “*would represent a grievous, man-made intrusion into a protected landscape*”. The same concern still applies to the smaller number of caravans now proposed. The application is therefore recommended for refusal.

Site and surroundings

2. Lower Greenfields Caravan Site is located in an enclosed field parcel in a relatively remote and isolated location in open countryside approximately 1km south east of Youlgrave, the nearest named settlement. The existing caravan site has an area of about 0.35 hectares and has a combination of established lawful use and planning permission for 16 touring caravan pitches. The application site is a field immediately to the north west of the existing caravan site. This field has an area of about 0.45 hectares. The nearest neighbouring properties are Lower Greenfields to the south west of the site, which comprises of a dwelling house and holiday accommodation, and Hollow Farm to the south. The site is located within a network of public rights of way

Proposal

3. The application seeks full planning permission for change of use of the agricultural field to allow the siting of five touring caravans. The proposal would form an extension to the existing caravan site.
4. The submitted information sets out that although touring caravans would be sited in the field, the applicant’s intention is that the caravans would be parked on the site throughout the duration of the opening months of the site, which are 01 March to 31 October. The caravans would therefore not move on and off the site during the open season.

RECOMMENDATION:

That the application be REFUSED for the following reason:

1. **The proposed development would result in unacceptable expansion of the existing caravan site that would result in a form of development that would be visually prominent and harmful to the valued landscape character and scenic beauty of the National Park. It would result in significant harm to landscape character contrary to policies L1, RT3, DMR1 and DMC3 and the guidance contained within section 15 of the National Planning Policy Framework.**

Key Issues

- The principle of development
- Impact on the landscape character and special qualities of the National Park
- Highways Impacts
- Economic benefits

History

The most relevant planning history is application NP/DDD/0919/1001 for use of the same field to site 15 caravans. This application was refused and an appeal was dismissed in June 2020. The Inspector's decision is discussed in more detail in the assessment section below.

Other planning history comprises of:

2012 – Application approved for one additional touring caravan pitch to the existing 15 pitches.

2009 - Lawful development certificate refused for existing use of the land for two additional pitches over and above those considered to be lawful in 1993.

1993 - Lawful development certificate granted for existing use of the land for a fifteen pitch caravan site.

Consultations

5. **Harthill Parish Meeting** – Object to the proposal because of adverse landscape and highways impacts.
6. **Youlgrave Parish Council** - Does not have a unanimous view on this new application. Note that some support was expressed for the business and knock on local economic benefits. However, there are also concerns about traffic impacts and that the site is not well screened.
7. **Derbyshire County Council Highway Authority** – *The site has been the subject of a previous application which it is understood was refused. In its response, the Highway Authority requested clarification as to the route caravans use / would be expected to use to access the site. It is still considered that this information is required.*

It is also noted that the proposed number of pitches has been significantly reduced. Clarification should be sought, however, as to whether this will mean tents will continue to be accommodated on the site and if so, the number of pitches that would still be available.

On receipt of further information, the Highway Authority will be able to provide formal comments on this application.

Representations

8. Friends of the Peak District have objected, noting the following:

“the field is not well-screened, nor could it be. Lying in a broad open landscape and in an elevated location the existing site is visible from a wide area (as the accompanying images show) and causes harm to the special character and landscape in Bradford Dale. Any extension into the adjacent field would increase that harm and would not be mitigated by the intention to replace tents, which are more discrete, by five caravans. The applicant’s ‘plan to plant trees and shrubs to enhance the site and provide some screening from the village of Youlgreave’ is not informed by an actual plan. The caravans are to be present throughout the year to reduce the access movements but this would increase the harm to the landscape.

Consequently the application is contrary to the relevant policies. Policy L1A requires that ‘development must conserve and enhance valued landscape character’ and DMR1 does not permit a small extension to an existing site ‘unless its scale, location, access, landscape setting and impact upon neighbouring uses are acceptable, and it does not dominate its surroundings.’ The National Planning Policy Framework para 172 requires that ‘great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.’

The proposed access arrangements appear unsatisfactory. The existing caravan site is accessed by a gravel track, also a bridleway, off Cliff Lane but the proposed access arrangements for the current application would be via Coach Road, with an alternative via Hollow Farm (adjacent to the site). According to the letter of objection from the Haddon Estate to the previous application, Coach Road or ‘Old Coach Road’ is a private road owned by the Haddon Estate. At present there are no legal agreements in place that allow motor vehicles access along this road which is a gated footpath and bridleway. The alternative access offered by the applicant is the private track to Hollow Farm, which is also a PRow and passes through the centre of a working farm. Although permission has been given by the owners of Hollow Farm by email (17-11-2019) for this route to be used, this is not a legal agreement and could be changed. Any intensification of use of these rights of way by motor vehicles would be detrimental to the amenity and safety of pedestrians, cyclists and horse riders that utilise them.

Conclusion

As this application would cause unacceptable harm to this landscape and would be contrary to Policies RT3 and L1, DMP Policy DMR1 and National Planning Policy Framework paras 170 and 172, we urge the PDNPA to reject the application.”

9. 13 letters of objection have been received from local residents. The objections raise concerns about traffic problems and highways safety, particularly from the use of Coach Road and Mawstone Lane, and the adverse landscape and visual impacts.
10. Eleven letters of support have been received, none of which are from addresses in the local area. The letters of support relate to the economic benefits of the development, the provision of additional tourism facilities and the well-run nature of the existing caravan site.

Main policies

11. Relevant Core Strategy policies: GSP1, GSP2, GSP3, DS1, L1, RT3, CC1

12. Relevant Development Management Plan policies: DMC3, DMR1, DMT3, DMT5

National Planning Policy Framework and National Planning Practice Guidance

13. In the National Park the development plan comprises the Authority's Core Strategy 2011 and the Development Management Policies 2019. Policies in the Development Plan provide a clear starting point consistent with the National Park's statutory purposes for the determination of this application. It is considered that in this case there is no significant conflict between prevailing policies in the Development Plan and government guidance in the NPPF with regard to the issues that are raised.
14. Paragraph 172 of the NPPF states that '*Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads.*'

Development plan

15. Core Strategy policies GSP1, GSP2 and GSP3 together say that all development in the National Park must be consistent with the National Park's legal purposes and duty and that the Sandford Principle will be applied where there is conflict. Opportunities for enhancing the valued characteristics of the National Park will be identified and acted upon and development which would enhance the valued characteristics of the National Park will be permitted. Particular attention will be paid to impact on the character and setting of buildings, siting, landscaping and building materials, design in accordance with the Design Guide and the impact upon living conditions of local communities. Core Strategy policy GSP4 highlights that the National Park Authority will consider using planning conditions or obligations to secure the achievement of its spatial outcomes.
16. Core Strategy policy DS1 outlines the Authority's Development Strategy.
17. Policy L1 identifies that development must conserve and enhance valued landscape character and valued characteristics, and other than in exceptional circumstances, proposals in the Natural Zone will not be permitted.
18. Policy RT3 of the Core Strategy states that small touring camping and caravan sites and backpack camping sites will be permitted, particularly in areas where there are few existing sites, provided that they are well screened, have appropriate access to the road network, and do not adversely affect living conditions.
19. CC1 sets out that developments will be expected to make the most efficient and sustainable use of land, buildings and natural resources.

20. DMC3 states that development will be permitted provided that its detailed treatment is of a high standard that respects, protects and where possible enhances the natural quality and visual amenity of the landscape, including the wildlife and cultural heritage that contribute to the distinctive sense of place.
21. Policy DMR1 states that the development of a new touring camping or touring caravan site, or small extension to an existing site will not be permitted unless its scale, location, access, landscape setting and impact upon neighbouring uses are acceptable, and it does not dominate its surroundings.
22. Policy DMT3 sets out that development will only be permitted where a safe access that is achievable for all people can be provided in a way that does not detract from the character and appearance of the locality.
23. DMT5 states that development that would increase vehicular traffic on footpaths, bridleways or byways open to all traffic to the detriment of their enjoyment by walkers and riders will not be permitted unless there are overriding social, economic or environmental conservation benefits arising from the proposal.

Assessment

Principle

24. Policy RT3 is broadly supportive in principle of small touring caravan development. Policy DMR1 sets out that small extension to an existing site will not be permitted unless its scale, location, access, landscape setting and impact upon neighbouring uses are acceptable, and it does not dominate its surroundings. The proposal is for an extension to an existing caravan site to add an additional five pitches. The existing site accommodates 16 pitches so the proposal would result in 21 in total. Policy RT3 does not define “small” sites but the supporting text clarifies that sites up to 30 pitches are more likely to be acceptable, although this may be too large in many circumstances. The proposal would still therefore be broadly within what can reasonably be considered to be a small site. However, such development is only acceptable in principle when it would not have an adverse landscape impact. The impact on the landscape is therefore key to the acceptability of this type of development. The landscape impact is discussed below.

Landscape Impacts

25. The site lies within a Valley Farmlands with Villages area of the Derwent Valley as identified in the Landscape Character Assessment. This is a settled pastoral landscape with a network of streams and damp hollows. Much of the landscape in this area is low lying, but the site is about half way up the hillside of Bradford Dale. The existing site is clearly visible from wide-ranging vantage points, including from the centre of Youlgrave village and further afar from the north.
26. With the exception of the existing caravan site and a few sparsely scattered farms, the hillside is largely unspoilt, comprising of enclosed fields and large wooded areas. It is a key part of the landscape character of this part of the National Park. The existing caravan site already has a detrimental impact on the landscape character. Caravans and cars parked within it are clearly visible and are at odds with the pastoral landscape and wooded areas higher up the hillside, resulting in a development which is a detracting feature in the landscape.
27. The proposal would result in the encroachment of the existing site into the undeveloped adjacent field. This would increase both the numbers of pitches and the

width of the site that is visible in the landscape. This would significantly exacerbate the existing level of visual impact and would have a significantly detrimental impact on the character of the landscape.

28. The submitted information sets out that the intention would be that touring caravans would be brought onto the site at the start of each season and would remain parked on it for the entire season regardless of whether or not they were in use at any given time. This would reduce the number of trips involving towed caravans (as discussed further in the Highways section below), but would mean that the visual impact of the caravans would remain the same, and significantly harmful, throughout the season. The site is so prominent that even the visual impact of touring caravans used in a transient way where they are regularly brought on and off the site would be unacceptable here. The fact that an additional 5 caravans would potentially be parked on the site for the whole of the open season would compound the harm.
29. It is understood that the field subject to the application is used occasionally for tent camping. There is no planning permission in place for tent camping so this would be limited to 28 days per year under Class B of Part 4 of the Permitted Development Order (56 days at the moment due to temporary a relaxation in response to covid 19). Use for 28 days a year (or 56 days for a temporary period) for tent camping would have significantly less visual impact than the proposed use for 15 touring caravans for 9 months of the year (246 days). That the proposed use would result in the tent camping not taking place anymore therefore carries very little weight in favour of the proposal.
30. We refused an application for 15 caravans within this field in 2019. An appeal against the refusal was dismissed in June 2020. The Planning Inspector gave a very clear assessment of the visual impact of siting additional caravans here, noting the following:
 - *“As I saw when I visited the area, the existing caravan site and appeal site are visible from wide-ranging vantage points, including from Mawstone Lane on the southern edge of Youlgreave and the Rights of Way network to the west which includes the popular Limestone Way.”*
 - *As with the existing site, there can be little doubt that the stationing of large and often prominently coloured vehicles would completely change the character of the land. Although the caravans would be removed over the winter months, they would be present during those months of the year when greater numbers of people would be visiting and enjoying the National Park for its natural and scenic beauty.*
 - *Whilst I note the Appellant’s intention to ‘plant trees and shrubs to enhance the site and provide some screening’, I have not been provided with a plan and therefore do not know what form the landscaping would take. In any event, although landscaping might assist in softening the visual impact of the development, this would inevitably take some years to reach sufficient maturity to be of benefit and in the intervening years the caravans would represent a grievous, man-made intrusion into a protected landscape. I also share the Authority’s concerns about how the site could be landscaped in a manner that would offer adequate screening from the multitude of visual receptors in the area.*
 - *I acknowledge that the Appellant would be entitled to use the appeal site for camping under the permitted development regime for up to 28 days a year. However, tents by virtue of their size, colour and lack of permanence are not in any way comparable to touring caravans. Accordingly, the existence of permitted development rights over the land adds very limited weight in favour of the appeal.*

- Overall, I conclude that the development would not conserve or enhance the landscape and scenic beauty of the Peak District National Park. It would thus conflict with CS Policies RT3 and L1, DMP Policies DMR1 and DMC3 and Section 15 of the Framework.
31. The inspector's decision leaves no doubt that the introduction of caravans in this field would be significantly harmful to the landscape character of this part of the National Park.
 32. It is fully acknowledged that the number of caravans now proposed has been reduced from the previous application and appeal. Whilst the extent of the significant harm may have been reduced by reducing the number of caravans and the area of land that would be covered by them, all the same concerns still apply even if to a slightly lesser extent. The proposed five additional caravans would still be a grievous, manmade intrusion into a protected landscape, in a prominent and elevated position. The existing field that forms the application site is not a suitable location for an extension to the existing caravan site because of this. Any number of caravans within this field would have a harmful landscape impact.
 33. The development would harm the landscape character and scenic beauty of the Peak District National Park. It would therefore conflict with Core Strategy Policies RT3 and L1, DMP Policies DMR1 and DMC3 and Section 15 of the NPPF.

Highways Impacts

34. In addition to the landscape harm, the previous application was also refused on highways grounds. However, although the Inspector comprehensively upheld our decision in respect of landscape harm, they did not agree with the reason for refusal on highways grounds.
35. The Inspector noted that:

“There is some ambiguity in the Appellant’s submissions regarding the issue of access. Despite an agreement to use the access through Hollow Farm it appears that the principle means of access to the site would be via Coach Road which is gated at its junction with Mawstone Lane and carries the line of a Public Right of Way. The Appellant states that this route has been used for over 20 years with no apparent problems. The Highway Authority has confirmed that Coach Road is Public Highway. On that basis and in the absence of any substantial evidence to the contrary, I am satisfied that the applicant has demonstrated a means of access to the site.

Whilst I acknowledge the substandard nature of Coach Road as well as its popularity with pedestrians, I have not been made aware of any accidents despite its use in connection with the existing caravan park. From my observations, any vehicles using Coach Road, whether towing or not, are likely to do so with extreme caution and are likely to be familiar with its limitations. In any event, irrespective of its deficiencies, the number of additional traffic movements is likely to be very small. I am therefore satisfied that the development would not materially harm highway safety. Accordingly, there would be no conflict with DMP Policy DMT5 C). Whilst the Authority’s second reason for refusal cites conflict with Policy DMT3, I do not consider this policy relevant to the appeal scheme.”

36. Letters of objection from local residents have raised very strong concerns about the additional traffic that would be generated by the development and potential for road safety problems. These concerns are fully acknowledged.

37. However, the previous appeal decision is a material consideration that must be given very significant weight.
38. As with the last application, there is some ambiguity about the access arrangements. However, the applicant has confirmed that the intention is for caravans to be brought on and off the site at the start and end of the season through Hollow Farm. This is by way of an informal agreement with the owners of Hollow Farm so could end at any point. As stated further above, the applicant has also stated that the caravans would be parked on site throughout the season, so would not be regularly towed on or off. Most traffic would therefore be cars driving to the site to use caravans that are already in situ, rather than cars towing caravans.
39. As with the previous application, the principle route for visitors to the site would be Coach Road. Coach Road is an adopted highway. Parts of Coach Road also form sections of public bridleway and public footpath.
40. Whilst we do retain some concerns about the use of Coach Road for additional traffic, and have sympathy with the views of local residents in this respect, great weight must be given to the Inspector's comments that use of Coach Road would not be harmful to highways safety, particular as the previous application would have generated more traffic than the scheme that is now proposed.
41. Overall, the view must be taken that a reason for refusal on highways grounds can no longer be substantiated.

Economic Benefits and Covid 19 Response

42. Several letters of support have been received which raise the benefits to the local rural economy, particularly in response to economic impacts caused by covid 19. These benefits are fully acknowledged and are given weight in the planning balance. The development would also provide a facility that would help to promote the second National Park purpose of promoting understanding and enjoyment of the National Park. However, the first purpose of the National Park is to conserve the environment of the National Park. Where conflict arises between conservation and public enjoyment then greater weight must be given to conservation. The development would be significantly harmful to the natural beauty of the National Park and this harm clearly outweighs the small scale economic and recreation benefits.
43. It must also be acknowledged that although the proposal would provide additional visitor accommodation, it would harm understanding and enjoyment of the National Park by users of the rights of way network. The proposal would be contrary to National Park purposes and cause harm, in perpetuity, to the nationally designated landscape.
44. The Planning Inspector also took into account the economic benefits in considering the previous scheme, but concluded that the landscape harm would clearly outweigh this. The Inspector's decision was very recent, being in June of this year.
45. Whilst the impact of the pandemic on rural businesses is fully acknowledged, assisting local businesses cannot be at the expense of significant and permanent harm to the landscape character and scenic beauty of the National Park.
46. We are working hard with rural business operators to find ways to support business in ways that are not significantly harmful to the National Park and in more

appropriate ways than are proposed in this application. One such option would be a temporary extension of the operating months at the existing site or temporarily siting a small number of additional caravans within the boundary of the existing area. Both of these options would be likely to deliver the same economic benefits to contribute to recovery, but would have a far lesser impact on the landscape character and scenic beauty of the National Park. We have made the applicant aware that these are options that we would be happy to investigate further with them.

Carbon Reduction and Energy Efficiency

47. Policy CC1 requires that new development makes the most efficient and sustainable use of land, building and natural resources and achieves the highest possible standards of carbon reductions and water efficiency.
48. The previous application was also refused because no details of how the scheme would accord with policy CC1 had been submitted.
49. Unfortunately, the Planning Inspector did not uphold this reason for refusal, noting that *“The Authority’s third reason for refusal cites conflict with the carbon reduction aims of Policy CC1. Whilst the development might generate a small number of additional traffic movements, that in itself is not a reasonable reason to reject the development. In any event, I am satisfied that the environmental impact of additional movements could be offset by a suitable landscaping scheme.”*
50. This was a disappointing stance and we do not agree that a landscaping scheme would achieve the requirements of policy CC1. However, we must again accept that the previous appeal decision is a material consideration that must be given very significant weight. As such, although it is disappointing that no carbon reduction or energy efficiency measures have been put forward in the current application, it would not be possible to substantiate a reason for refusal for this reason in this specific case.

Conclusion

51. The proposed expansion of the existing caravan site would result in significant harm to the landscape character of this area of the National Park. The economic and tourism benefits of the scheme have been fully considered but do not outweigh this harm. The application is contrary to policies L1, RT3, DMR1 and DMC3 and the guidance contained within the National Planning Policy Framework. The application is recommended for refusal.

Human Rights

52. Any human rights issues have been considered and addressed in the preparation of this report.

List of Background Papers (not previously published)

Nil

Report Author: Tom Shiels, Area Team Manager