

10. FULL APPLICATION – PROPOSED CREATION OF 35 MOTORHOME PITCHES at HOLMESFIELD, MILL BRIDGE, CASTLETON (NP/HPK/06255/9541) WE

APPLICANT: Miss J Bradley

Summary

1. This application seeks full planning permission for the change of use of an agricultural field to a motorhome camp site comprised of ~21 all-year pitches and an additional ~20 seasonal pitches for use between April and October (inclusive).
2. The proposed development would have a detrimental impact on the valued landscape character and a harmful impact on the setting of the Castleton Conservation Area. In addition to this, there is significant concern regarding the safety of the site access onto A6187 Castleton Road and the access track being located in Flood Zone 3B functional floodplain.
3. Having balanced the identified harm to the special qualities of the area and substandard technical details against the economic benefits of the proposal, in addition to other material planning considerations such as permitted development rights, the benefits do not outweigh the identified harm.
4. The proposed development is therefore in conflict with the relevant policies of the development plan and would fail to *conserve and enhance the natural beauty. and cultural heritage* of the National Park.
5. This application is therefore recommended for refusal.

Site and Surroundings

6. Holmesfield Farm is located between Hollowford Road and the A6187, to the north of the village of Castleton. The section of the farm subject to this application is accessed from the A6187 just north of Mill Bridge where the road bents to the east.
7. The house and buildings are accessed off Hollowford Road, near Millbridge, which is a narrow lane that leads northwards out of the centre of Castleton village. The farm bungalow and associated buildings are positioned on elevated ground above Peakshole Water, the stream that flows around the north side of Castleton and through the farm.
8. The bungalow is about 50 years old and built from artificial stone under a roof of artificial concrete slates. To the side of the bungalow there is a collection of farm buildings and sheds. Peakshole Water runs to the south of the site, separating it from the rear of houses on How Lane. There are residential properties to the south-east and south-west of the site, beyond the stream. The land surrounding the site to the north is agricultural.
9. It is unclear whether the site is still used in connection with agriculture.
10. The majority of the site is in Flood Zone 1; however, the site access to the east onto A6187 is in Flood Zone 3 for surface water and fluvial (from the river) flooding.
11. The development site is outside, but within the setting of, the Castleton Conservation Area which is to the south-west of the site. There are no listed buildings on or surrounding the site.

Proposal

12. This application seeks full planning permission for the change of use of the field parcel for use as a motorhome camping site. The site would be separated into two sections, north and south bisected by the track which crosses the site. To the north, the application proposes 21 all-year pitches comprised of ~15 pitches on grassland and 6 pitches on existing hardstanding to the west of the site. To the south of the track, this application proposes an additional ~20 seasonal pitches on grassland for use between April – October inclusive.
13. The application also proposes a new timber shed for toilet facilities.
14. The application also seeks retrospective planning permission for the alterations to the site access which were carried out between the withdrawal of the previous planning application in 2023 and the submission of this planning application. The alterations to the site access include the relocation of the gateposts approximately 10m metres back and the widening of hardstanding within the access.
15. The application proposes additional planting on the northern and southern boundary of the site.

RECOMMENDATION:

That the application REFUSED for the following reasons:

1. **The proposed development 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. The development would fail to conserve or enhance the valued characteristics of the landscape, contrary to policies GSP1, L1, RT3, and DMR1 and Chapter 15 of the National Planning Policy Framework.**
2. **The proposed development would harm the significance and setting of the setting of the Castleton Conservation Area, contrary to policies L3, DMC3, DMC8 Chapter 16 of the National Planning Policy Framework.**
3. **The application has not been supported by a sequential test to demonstrate that the development cannot be located in an area of low flood risk. The proposed development would be classified as more vulnerable to flood risk and would not be a compatible use within Flood Zone 3b. The proposed development is therefore in conflict with policy CC1, paragraphs 170 and 173 of the National Planning Policy Framework and the Planning Practice Guidance.**
4. **The application has failed to demonstrate that the site access is safe for its intended use. The proposed development is therefore in conflict with policy DMT3.**

Key Issues

- Principle of the development;
- Impact on the valued characteristics of the landscape and heritage assets;
- Highway impacts;
- Flood risk;
- Amenity impacts;
- Other matters;
- Planning balance.

History

- 1969 - Full planning permission granted for a bungalow for agricultural use
- 1971: Planning permission granted for a barn on the south side of the land to the rear of the bungalow.
- 2012: NP/HPK/0212/0210: Erection of agricultural building. Granted conditionally.
- 2022: NP/HPK/0422/0586: Change of use of agricultural land to caravan and motorhome camp site. Application withdrawn.
- 2023: Since 2023, the site has operated as a campsite using the Class BC Permitted Development Rights for up to 60-days per year.

Consultations

16. Environment Agency – Objection. *The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change planning practice guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to:*
- *Address the Flood Zone 3b within the redline boundary and how it impacts the proposed development*
 - *Consider safe access and egress routes, the main route in and out of the site is accessed through Flood Zone 3b (functional floodplain)*

The Environment Agency also asked for clarification on how the development proposal would be compliant with Table 2 of the PPG and NPPF.

17. Highway Authority – Requested the application be deferred for submission of additional information relating to:
- Scale plan of access showing dimensions of the access width, radii and setback;
 - Swept path analysis to and from the site access for vehicles which would use the site (Motorhome and refuse vehicles);
 - Scale plan showing visibility splays based upon the legal speed limit of the highway;
 - Alternatively, if a speed survey has been carried out the visibility splays should be based upon the 85th percentile of the speed survey results;
 - The visibility splays should also have consideration to the vertical alignment along Castleton Road with sight lines being clear of any object greater than 0.6m above the carriageway. They requested this be included on a plan;
 - A review of PIC collisions of the application site;
 - Commentary on implication of vehicles parking on the site access and adjacent site;
 - Revised plan showing the precise location of 35 motorhome pitches with dimensions shown;
 - Swept plan of internal layout;
 - Details of waste management procedure;
 - Trip generation details;
 - Sustainable travel details, such as proximity to amenities, retail stores, local walking routes etc and how these will be accessed by patrons of the campsite.

18. Lead Local Flood Authority – No comments due to application being minor development

19. PDNPA Landscape – Objection. *While I think the planting may be a positive landscape feature in itself and the adverse long term (10 years+) effects are probably limited - I think the limited long terms effects in combination with larger short-term effects **do not accord with L1** (Development must conserve and enhance valued landscape character).*

I therefore do not support the application.

20. PDNPA Tree Conservation Officer – No objection. Proposed development would be outside of the tree root protection areas. Alerted case officer to southern boundary trees being mature ash specimens. Recommended two conditions on the proposed planting strategy.

21. Castleton Parish Council – Objection. *The Parish Council considers the proposed caravan and motorhome site as detrimental to the village of Castleton, and wishes to object to the planning application on a number of grounds:*

Access issues

Impact on landscape and character

Capacity of infrastructure

Loss of privacy for neighbouring properties, noise and disturbance

Access issues

- Questions whether the site access is suitable with particular regard to the parapet wall, and disagrees with the DAS which states that the height of a motorhome means that drivers will be able to view over parapet;
- Concern over vehicles turning left out of the site access;
- No visibility splays included in the application;
- Disagrees with the DAS which states that the average speed is below 30mph. Referenced recent speed survey which demonstrated that 15% of traffic was travelling at a speed of at least 33mph into or out of the bend, and 5% was travelling at speeds of at least 36mph. Stated that on average, more than 6850 vehicles passed the access every day;

Flood risk

- Provided photograph of site in October 2023 showing extensive flooding of track and access, and disagrees with summary of DAS which stated that if the site access flooded, so would the A6187;
- Concern regarding emergency access from Millbridge Lane;

Impact upon landscape and character

- Significant concern over the use of the site for motorhome camping, referencing the National Planning Policy Framework;
- Questioned the PD fallback within the DAS;
- Raised particular concern with the LVIA and considered it subjective and open to interpretation. Raised particular concern with view from A6187 towards Mam Tor and how it has been categorised in LVIA;

Capacity of infrastructure

- There is no evidence to suggest that sufficient provision is made for waste disposal including importantly for the emptying of portable toilets and waste water etc.

Loss of privacy for neighbours, noise and disturbance

- The change in PDR in 2023 relating to temporary use of land has increased visitor pressures on the village. This proposal would exacerbate these negative impacts. This includes the negative impact on the amenity of adjoining and nearby properties.

22. PDNPA Ecology – Clarified the application was subject to biodiversity net-gain

23. High Peak Borough Council – No response to date

NB: The above are summarised consultation responses. Full consultation comments available on public planning portal.

Representations

24. 197 representations were received during the determination of the application.

25. 148 representations supported to the proposed development. They raised the following reasons for support:

- Assert that the facility is well-maintained, professionally run and suitable;
- Good facility for the National Park as a whole;
- Deter or decrease overnight campers on surrounding roads, like Old Road;
- Recognise that tourism is a key part of the National Park economy, and which would contribute towards it.
- Assist the village economy, particularly in winter months;
- Praised the site's accessibility;
- Increase the number of overnight visitors to the area, further contributing to the evening economy;
- Campervan site would support the farm shop which serves local produce;
- Sustainable site close to village;
- Site is operated by a Castleton local who has vested interest in making sure the site is run appropriately;
- Some campervan users would prefer to use a dedicated site with appropriate facilities, rather than the sites permitted by 60-day PD rights;
- Cited lack of facilities for campervans locally;
- Site is over 18's only, which suggests the guests are more respectful and considerate of their neighbours;
- Community benefits;
- Enable people to visit the National Park during the winter months;
- Diversified farm income;
- Recognise that tourism can bring positives and negatives, but a well-controlled and regulated site would assist in mitigating the negative impacts experienced by residents of Castleton;
- Local business owners have written in support of the application;
- Affordable option to visit the village;
- Site has access from A6187, removing traffic moving through the historic core of the village;

26. 43 representations objected to the proposed development for the following reasons:

- Negative impact upon amenity of nearby residents, including noise from guests and dogs into the evening and night-time;
- Impact upon the scenic beauty and tranquillity of the Castleton area;
- Questions need considering nearby motorhome facilities and concerns regarding the cumulative impact;
- Significant concerns regarding safety of Millbridge access and impact upon Millbridge itself;
- Poor and dangerous visibility onto Castleton Road;
- Raised procedural comments regarding the time for the highway comments to be received;
- A suitable site is on edge of Castleton with much better screening and access;
- Impact upon the conservation area and Peveril Castle;
- Issues surrounding waste disposal;
- Perceived inaccuracy in LVIA;

- Concern over time for planting to establish;
 - Concern over conduct of guests;
 - Pollution and risk to wildlife;
 - Guests have stored food and drink in the river which is a danger to the watercourse health;
 - A row of campervans is not what a visitor to the area would expect from Castleton and in the National Park;
 - Increased litter;
 - Concern over the effectiveness and long-term ability for planting to screen the site – requested that if permission is granted a deeper belt of planting is conditioned;
 - Cited concern that the site is currently being operated in breach of permitted development rights and questioned whether the site operator would comply with planning permission;
 - Concern over animal welfare on neighbouring sites, including horses and foals;
 - Over-development of the village and site;
 - Flood risk to the site access;
 - Inadequate sanitary provisions;
- 6 representations made general comments, citing procedural questions or raising similar points to those above without an expression of support or objection.

Main Policies

Relevant Core Strategy policies: GSP1, GSP2, GSP3, DS1, L1, L2, L3, RT3, CC1, CC5

Relevant Local Plan policies: DMC1, DMC3, DMC5, DMC8, DMC11, DMC13, DME2, DMR1, DMT3

National Planning Policy Framework

27. The National Planning Policy Framework (NPPF) was published on 27 March 2012 and replaced a significant proportion of central government planning policy with immediate effect. It was last updated in December 2024. The Government's intention is that the document should be considered as a material consideration and carry particular weight where a development plan is absent, silent or relevant policies are out of date. In the National Park the development plan comprises the Authority's Core Strategy 2011 and those in the Development Management Plan adopted in May 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.
28. Paragraph 184 states that "great weight should be given to conserving 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 landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads."

Core Strategy

29. Policy GSP1 sets out the broad strategy for achieving the National Park's objectives having regard to the Sandford Principle, (that is, where there are conflicting desired outcomes in achieving national park purposes, greater priority must be given to the conservation of the natural beauty, wildlife and cultural heritage of the area, even at the cost of socio-economic benefits). GPS1 also sets out the need for sustainable development and to avoid major development unless it is essential, and the need to mitigate localised harm where essential major development is allowed.
30. Policy GSP2: Enhancing the National Park states that:
- Opportunities for enhancing the valued characteristics of the National Park will be identified and acted upon
 - Proposals intended to enhance the National Park will need to demonstrate that they offer significant overall benefit to the natural beauty, wildlife and cultural heritage of the area.
 - When development is permitted, a design will be sought that respects the character of the area.
 - Opportunities will be taken to enhance the National Park by the treatment or removal of undesirable features or buildings. Work must be undertaken in a manner which conserves the valued characteristics of the site and its surroundings
 - Development in settlements necessary for the treatment, removal or relocation of nonconforming uses to an acceptable site, or which would enhance the valued characteristics of the National Park will be permitted.
31. Policy GSP3 sets out development management principles and states that all development must respect, conserve and enhance all valued characteristics of the site and buildings, paying particular attention to, amongst other elements, impact on the character and setting of buildings, scale of the development appropriate to the character and appearance of the National Park, design in accordance with the National Park Authority Design Guide and impact on living conditions of communities.
32. Policy DS1 sets out the Development Strategy for the National Park. DS1.C. sets out the forms of development that are acceptable in principle in the countryside outside of the Natural Zone. There is no scope for the erection of new housing here other than as part of development needed to secure effective conservation and enhancement.
33. Policy L1 says 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.
34. Policy L3 'Cultural heritage assets of archaeological, architectural, artistic or historic significance' states that: A. Development must conserve and where appropriate enhance or reveal the significance of archaeological, architectural, artistic or historic assets and their settings, including statutory designations and other heritage assets of international, national, regional or local importance or special interest.
35. 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.

36. Policy CC1 states that development must make the most efficient and sustainable use of land, buildings and natural resources, taking into account the energy hierarchy and achieving the highest possible standards of carbon reductions and water efficiency. Part C also states that development must be directed away from flood risk areas, and seek to reduce overall risk from flooding within the National Park and areas outside it, upstream and downstream.

Development Management Policies Plan

37. Policy DMC1 states that in countryside beyond the edge of settlements listed in Core Strategy policy DS1, any development proposal with a wide scale landscape impact must provide a landscape assessment with reference to the Landscape Strategy and Action Plan. The assessment must be proportionate to the proposed development and clearly demonstrate how valued landscape character, including natural beauty, biodiversity, cultural heritage features and other valued characteristics will be conserved and, where possible, enhanced.
38. Policy DMC3 says where development is acceptable in principle, it will be permitted provided that its detailed treatment is of a high standard that respects, protects and where possible enhances the natural beauty, quality and visual amenity of the landscape, including the wildlife and cultural heritage that contribute to the distinctive sense of place.
39. Policy DMC5 states detailed advice relating to proposals affecting heritage assets and their settings, requiring new development to demonstrate how valued features will be conserved, as well as detailing the types and levels of information required to support such proposals.
40. Policy DMC8 requires that applications for development in a Conservation Area, or for development that affects its setting or important views into, out of, across or through the area, should assess and clearly demonstrate how the character or appearance and significance of the Conservation Area will be preserved or enhanced.
41. Policy DMC11 states that development should aim to achieve net gains to biodiversity or geodiversity as a result of development. In considering whether a proposal conserves and enhances sites, features or species of wildlife, geological or geomorphological importance all reasonable measures must be taken to avoid net loss.
42. Policy DMC13 states that applications should provide sufficient information to enable their impact on trees, woodlands and other landscape features to be properly considered in accordance with 'BS 5837: 2012 Trees in relation to design, demolition and construction – Recommendations' or equivalent.
43. Policy DME2 states that development for farm diversification will be permitted if there is clear evidence that the new business use will remain ancillary to the agricultural operation of the farm business and provided there is no net harm to valued landscape character.
44. Policy DMR1 states that the development of a new camping or touring caravan sites will not be permitted unless the scale, location, access, landscape setting and impact upon neighbouring uses are acceptable and it does not dominate its surroundings
45. 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.

Assessment

Principle of the development

46. Policy RT3 is broadly supportive in principle of small touring caravan development. Policy DMR1 sets out that the development of a new 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 the change of use of the land to provide up to 35-pitches, in addition to the retention of 6 areas of hardstanding. Therefore, the total number of pitches would be 41.
47. 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.
48. The proposal would therefore go beyond what policy RT3 envisaged as “small” at the time the Core Strategy was prepared; however, it should be stressed that the supporting text for the policy is only advisory and should not be given the same weight as the policy wording itself.
49. Regardless of the precise number of pitches, the policy is clear in stating that touring sites are only acceptable when they would not have an adverse upon the landscape character or other valued characteristics of the area, such as heritage assets.
50. Therefore, the impact of the proposed development on the landscape character and setting of the Castleton Conservation Area is a key consideration in the determination of this planning application.

Impact upon landscape and conservation area

51. The site lies within the Valley Farmland with Villages LCT in the Derwent Valley LCA. This is a settled pastoral landscape, often with a low-lying topography associated with a network of streams and damp hollows. This is an enclosed landscape, with views filtered through scattered hedgerow and streamline trees. Stone-built villages with outlying farms and dwellings are set within small to medium fields that are often bound by hedgerows. The Castleton Conservation Area Appraisal notes the historic nature of the landscape around the village, with historic field systems and extensive views from surrounding hills, including from Peveril Castle.
52. The application site is part of the undeveloped setting of Castleton and makes an important contribution to the character and significance of the Conservation Area. The field also provides an important backdrop to the nucleated and compact form of development within Castleton, particularly when viewed from the south.
53. This application has been supported by a Landscape and Visual Appraisal (LVIA) which has been carried out by qualified landscape architects. The summary of their report is as follows:

The proposed development could be successfully assimilated into the local landscape with important landscape features protected, introduction of new habitats, and achieving local landscape character objectives. Long-term landscape feature and character effects would be neutral or beneficial in nature, with only adverse effects on the immediate localised and site landscape character due to loss of grassland.

Initially the proposal would have some short-term negligible or minor visual adverse effects due to visibility of the pitches whilst the landscape framework establishes,

*however in the long-term visual effects would become mostly neutral with some negligible adverse and negligible beneficial visual effects.
The proposal would respond positively to landscape related policy at National and Local levels.*

The slight initial harm of the proposal would need to be balanced against the benefits of the provision of a caravan and motorhome pitches.

54. The National Park Authority Landscape Officer has reviewed the application. In assessing the likely effects of the development, the Landscape Officer asserts that *the motorhomes (and associated vehicle movements) would form **new adverse elements** within the local landscape and in views. Motorhomes would offer significant conflict with the landscapes pastoral character.*
55. In particular, the Landscape Officer has raised concern over the visibility of the development from Peveril Castle, stating *the application scheme would be visible from Peveril Castle (which has open views into the site) and from wider elevated (but distant) views from the north – while a relatively small adverse view element, it would extend development further north.*
56. The landscaping scheme would potentially comply with the objections of the LCT, namely the creation of woodland, and therefore could theoretically be a positive landscape feature. The proposed landscaping scheme would screen the development from certain views, though it is likely that it would take upwards of 10-years before the planting is well enough established to screen the development. Furthermore, the Landscape Officer has raised concern that the proposed planting would not mitigate the impact of the development from Peveril Castle which has open views into the site, nor from wider elevated views from the north.
57. The Landscape Officer has also raised concern that the LVIA underestimates the visual impact of the development. For example, the assessment correctly states that Peveril Castle has a high sensitivity to impacts, but goes on to advise that at year 1, the development would have a 'small' magnitude resulting in a minor adverse effect. In year 15, the LVIA states that the magnitude would be 'very small' with a negligible adverse effect. Commenting on this, the Landscape Officer states that 'even if their judgment of small magnitude is accepted, combining a small magnitude with a high sensitivity is more likely to give a moderate adverse effect'.
58. Furthermore, the LVIA does not provide an assessment of the immediate landscape setting of the settlement edge of Castleton. This is particularly pertinent as the Castleton Conservation Area specifically references the cultivated fields surrounding the settlement covering the valley floor, running right up to the edge of the ridges on both sides of the valley. These features, whilst outside of the Conservation Area, contribute towards the setting of both the Castleton Conservation Area and the village as a whole in the landscape.
59. Accordingly, the proposed development would be visible from several vantage points, particularly from the higher land to the south like Peveril Castle. From these viewpoints, the development site is visible and open. The scattered deciduous trees on the southern boundary of the development site provide limited screening, and are comprised of ash trees. It is likely that these trees will, or are currently, experiencing die-back which limits their overall lifespan. It is likely they will either need to be removed or pollarded which would vastly reduce their screening. The siting of up to 41 motorhomes in this location would result in the encroachment of a man-made intrusion into the landscape and setting of the village. It is also noted that the motorhomes would be in various sizes and colours, and would include larger features such as awnings and other temporary structures. This

would further contribute to a sense of 'clutter' on the landscape which would contrast with the relatively traditional appearance and layout of the village when viewed from this receptor.

60. Furthermore, the development would be visible from longer distance views from the north looking south, such as Hollins Cross, Mam Tor and Lose Hill. From such distances, the development would be a small feature on a wider landscape; however, it is well understood that white caravan and motorhome sites, particularly larger ones, can appear stark and strident on an otherwise pastoral landscape.
61. The proposal outlines that the southern half of the site would be seasonal, operating between April to October inclusive. This is noted; however, it is the northern half of the site which would be most visible on the landscape, particularly during the winter months when the trees are bare. The seasonal use nature of half the site would therefore do little to mitigate its landscape impact.
62. It is acknowledged that in isolation, the proposed landscaping would assist in contributing towards the landscape character type objections. However, the planting would provide limited mitigation from the elevated land surrounding the site, and in any case would take several years to establish.
63. The presence of more significant short-term harm whilst the planting is establishing coupled with the limited long-term harm from raised land to the south would contribute to a harmful landscape impact. The proposed development would therefore not conserve nor enhance the valued landscape character and would be in conflict with policy L1.
64. As noted, the development site is outside, but within the setting of, the Castleton Conservation Area. Policy DMC8 requires that applications for development in a Conservation Area, or for development that affects its setting or important views into, out of, across or through the area, should assess and clearly demonstrate how the character or appearance and significance of the Conservation Area will be preserved or enhanced.
65. The proposed development would be visible from within the Conservation Area, including the grade I listed Peveril Castle, but also across the Conservation Area from the raised land to the north and west.
66. The development site is a well-preserved field directly abutting the conservation area. Historic mapping show that the field in its current shape and boundary has been present since at least 1841 (Tithe Map). While the contribution the field makes to the setting of the designation has been eroded since 2010 (the construction of the agricultural building and track), it nevertheless still contributes through its preservation, relating well to the historic industry of Castleton and its historic relationship to the surrounding fields across the valley floor.
67. The siting of up to 41 motorhomes on this site would result in a detrimental impact to the setting of the conservation area. It would extend the 'built-form' of the village further into the open countryside, with the various sizes and colours contrasting the traditional materials used across the village and conservation area. It would also appear somewhat divorced from the main form of the village, appearing as two linear rows of motorhomes with the field to the south separating the site from the village.
68. It would also have a negative impact on the views from Peveril Castle. The viewing area at the castle provides sweeping views across the village and its Conservation Area. The siting of up to 41 motorhomes would be extremely conspicuous from this location and significantly contrast the prevailing form and material palette of the village.

69. Accordingly, the proposed development would also have a harmful impact on the cultural heritage of the village, causing a less than substantial impact on the setting of both the Castleton Conservation Area, but also Peveril Castle as a grade I listed building and scheduled monument. The weighing of the harm of designated heritage assets against public benefits will be discussed in a subsequent section of this report.
70. The proposed development is therefore in conflict with policies L3, DMC5, DMC6, DMC7, and DMC8.

Highway Impact

71. The proposed development seeks retrospective planning permission for the alterations to the eastern site access which were carried out between the withdrawal of the previous application and the submission of this application.
72. The gates have been moved back approximately 10m from their original position, with the gateposts remaining in place. There is timber post and rail fencing extending from the gateposts to the new gates and new cattlegrid.
73. The proposed development would result in an intensification of use for this access. A pertinent consideration is therefore whether the access is suitable for the proposed change of use of the land.
74. The Highway Authority have been consulted and requested the submission of additional information on the following matters:
- Scale plan of access showing dimensions of the access width, radii and setback;
 - Swept path analysis to and from the site access for vehicles which would use the site (Motorhome and refuse vehicles);
 - Scale plan showing visibility splays based upon the legal speed limit of the highway;
 - Alternatively, if a speed survey has been carried out the visibility splays should be based upon the 85th percentile of the speed survey results;
 - The visibility splays should also have consideration to the vertical alignment along Castleton Road with sight lines being clear of any object greater than 0.6m above the carriageway. They requested this be included on a plan;
 - A review of PIC collisions of the application site;
 - Commentary on implication of vehicles parking on the site access and adjacent site;
 - Revised plan showing the precise location of 35 motorhome pitches with dimensions shown;
 - Swept plan of internal layout;
 - Details of waste management procedure;
 - Trip generation details;
 - Sustainable travel details, such as proximity to amenities, retail stores, local walking routes etc and how these will be accessed by patrons to the campsite.
75. The Highway Authority has confirmed that the above information is necessary to assess the safety concerns and impact upon the local highway.
76. This information was passed onto the planning agent on 14th October before the formal comments were uploaded to the public portal on 16th October. At the time of preparing this report, no further information has been provided to respond to the Highway Authority's concerns.
77. Accordingly, at the time of preparing this report the application has failed demonstrate that the proposed access is suitable for its intended use and would not contribute to an

unacceptable risk to public or highway safety. A verbal update will be given during the committee presentation should any further information be received.

78. Furthermore, policy DMT3 states that development which includes a new or improved access onto a public highway, will only be permitted where, having regard to the standard, function, nature and use of the road, a safe access that is achievable for all people, can be provided in a way which does not detract from the character and appearance of the locality and where possible enhances it. As outlined above, the application has first to demonstrate that the site access is safe.
79. With regard to its design, the proposed access has been altered in such a way which has vastly increased its prominence in the street-scene. Prior to its unauthorised alterations, the gates were flush with the drystone wall and had a relatively inconspicuous appearance (despite its width). After the alterations, the access has become a much greater feature in the street-scene with increased hardstanding, complicated layout and increased fencing.
80. The works have had a negative impact on the character and appearance of the street-scene. This is particularly harmful given its location on the main approach into the village from the Hope Valley. This further contributes to the unacceptable impact the proposed development has on the valued characteristics of the locality.
81. Therefore, the proposed site access, in addition to the retention of the alterations, would be in conflict with policy DMT3.

Flood risk

82. Peakshole Water runs to the south of the development site. The eastern site access and the eastern section of the track is located in Flood Zone 2 and 3 for risk of river and sea flooding, and also at high risk of surface water flooding.
83. In the Environment Agency's response dated 7th July 2025, they noted that part of the redline area of the site is located in Flood Zone 3b, which is the functional floodplain.
84. Paragraph 170 of the NPPF states that *inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.*
85. Paragraph 175 of the NPPF goes on to state *the sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including **access** or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).* Paragraph 176 goes on to state that for change of use applications, the sequential test would not be required except for changes of use to caravan and camping sites.
86. While the proposed pitches would be located on elevated land which is in Flood Zone 1 and well above all modelled flood water levels, it nevertheless proposes access across the functional flood plain. Paragraph 175 makes explicit reference to the sequential assessment being required where the access is located in an area of flooding.

87. No site-specific sequential test has been submitted. Therefore, it has not been shown to the Authority's satisfaction that the proposed development cannot be delivered on a site at lower risk of flooding.
88. Typically, if an application passes the sequential test, an exception test would need to be carried out to demonstrate the development would provide wider sustainability benefits to the community that outweigh flood risk, and the development would be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.
89. Regardless of whether the site *would* be able to pass the sequential test, paragraph 177 is clear that the exception test should only be applied depending on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Classification set out in Annex 3 of the NPPF.
90. Sites used for holiday or short-let caravan and camping is categorised as 'more vulnerable'. In the Planning Practice Guidance, Table 2 sets out the 'incompatibility' of flood risk vulnerability and flood zones. It states that 'more vulnerable' development in flood zone 3b should not be permitted, advising that only essential infrastructure should be permitted in flood zone 3b.
91. While the site would have an alternative access at lower risk of flooding, and the proposed pitches would be in flood zone 1, the proposed development has nevertheless not followed the guidance outlined within the NPPF and PPG. Furthermore, the guidance is explicit in stating that only essential infrastructure be permitted in flood zone 3b.
92. Therefore, the proposed change of use of the land to campervan/motorhome camping is not acceptable and would be in conflict with the National Planning Policy Framework and the Planning Practice Guidance, in addition to core strategy policy CC5.

Impact upon residential amenity

93. The closest residential properties to the area proposed to be used as pitches is approximately 70m to the south on Trickett Close; however, for the majority of the site the closest properties are over 100m to the south along How Lane or 150m to the east on Squires Lane.
94. It is inevitable that the proposed development would be visible, and potentially audible, from the identified properties nearby; however, the visibility of the site from these properties would not amount to harm to their amenity or living conditions. Furthermore, from such distances, it is unlikely that the noise generated from the site would contribute towards an unacceptable impact on their living conditions. The application also proposes additional low-lying shrub planting along the southern boundary which would go a limited way towards minimising the noise impact of the development. Furthermore, from such distances the use of the site would not amount to a loss of privacy.
95. Concern has also been raised about the noise from visitors of the site accessing the village via Millbridge. This is noted, but there is no evidence to suggest that guests using this route would contribute towards an unacceptable noise impact along the public paths and roads.
96. Representations have also raised concern relating to chemical waste disposal, campfires, guests feeding livestock on adjoining land and damaging drystone boundary walls. These matters could be reasonably controlled through planning conditions, civil routes or other permitting regimes such as camp licences. Therefore, these would not amount to an unacceptable impact upon amenity.

97. It is therefore accepted that the site could be operated in such a way to not harm the residential amenity or living conditions of neighbouring properties. In this regard, the proposal is in compliance with policy GSP3.

Other matters

98. This application would be subject to biodiversity net-gain. The BNG Metric and a BNG report has been submitted in support of the proposal.
99. The BNG report outlines that the proposal could contribute towards a 17.23% net-gain to onsite habitats. This is far in excess of the statutory 10% gain.
100. The site is currently comprised of improved grassland with limited tree coverage and a distance of 45m to Peakshole Water. Therefore, it is accepted that the proposed development would not harm the ecological value of the site, nor protected species. It is therefore in compliance with policies L2 and DMC11.
101. The proposed development would have an unacceptable impact on onsite trees. The pitches would be well clear of the tree root protection areas.
102. The Tree Conservation Area has suggested a number of conditions relating to the planting strategy. Subject to conditions, the proposal would be in compliance with policy DMC13.

Planning balance

103. As noted above, the proposed development would have a harmful impact upon the landscape character, in addition to the setting of both the Castleton Conservation Area and Peveril Castle as a grade I listed building and scheduled monument.
104. Paragraph 215 of the National Planning Policy Framework requires the harm to the heritage asset to be weighed against the public benefits of the proposal, including where appropriate, securing its optimum viable use.
105. In this instance, it is acknowledged that the proposed development would provide modest economic benefits to the village of Castleton. If it is assumed that each motorhome would accommodate two guests, the proposed site could accommodate approximately 85 guests.
106. The site is well connected to the village centre of Castleton and its associated amenities, including pubs, cafes, tourist destinations and shops. The provision of the motorhome site would provide economic benefits associated with increased footfall in Castleton.
107. Furthermore, the Design and Access Statement states that site would provide an important diversified income for the farm business; however, it is not clear whether there is still an agricultural business operated from the site and it is also unclear how the campsite would remain as a subservient, ancillary function to the farm business. Therefore this is afforded very little weight in the balance. The proposed development would also provide in excess of 10% to on-site habitats which would enhance the ecological value of the area. Similarly, this is a public benefit which can only be afforded limited weight.
108. While there would be public benefits associated with the development, these would not outweigh the less than substantial harm identified to the setting of Castleton Conservation Area or Peveril Castle. The proposed development would therefore be in

conflict with policies L3, DMC5, DMC7 and DMC8, in addition to Chapter 16 of the National Planning Policy Framework.

109. Furthermore, this report has identified harm to the landscape character. Similarly, the public benefits associated with the development, such as increased economic trade in Castleton and additional visitor accommodation, would not outweigh the harm to the landscape. With regard to increased visitor accommodation/capacity, legal precedent is clear in stating that when there is conflict between the two purposes of the National Park, in this instance the increased accommodation which would contribute towards the public enjoyment and understanding of the special qualities of the National Park causing harm to the natural beauty and cultural heritage of the National Park, conservation should take precedent (Sandford Principle).
110. The Design and Access Statement refers to the Class BC (The Town and Country Planning (General Permitted Development) (England) Order 2015) permitted development right serving as a fallback position. This is acknowledged; however, the Design and Access Statement erroneously refers to the applicant being able to have 'hundreds of pitches under Class BC. The right enables a site operator to use the site for up to 60-days across a calendar year for up to 50 pitches at once. However, this application proposes 26 pitches for 365 days, and 41 pitches for 213-days. This is so far in excess of the permitted development that it bears little reasonable comparison or weight in the balance. Furthermore, Class BC requires prior approval on matters relating to Flood Risk. As noted above, as proposed, the development would be in conflict with national planning policy and guidance so the reference to Class BC may not be applicable.
111. Accordingly, when weighed in the wider planning balance there are no material considerations which outweigh the identified harm to the landscape and cultural heritage of the area. The application should therefore be determined in accordance with the development plan.

Conclusion

112. The siting of up to 41 motorhomes during the summer months would be extremely conspicuous and visible from several viewpoints, including from Peveril Castle to the south and the raised land to the north. In addition, the application proposes 21 all-season pitches on the north of the site. During this period when the deciduous trees are not in leaf, there would views onto these all-year pitches primarily from the south but also from the north and other elevated areas surrounding the site despite the decreased number of pitches. As such, the proposed use of the site would have adverse landscape impacts across the whole year.
113. The proposed change of use of the land to a motorhome campsite would therefore contribute towards a harmful impact on both the landscape character and designated heritage assets in the locality.
114. Having balanced the benefits associated with the proposed development, it has been concluded that the economic benefits and increased visitor accommodation to Castleton would not outweigh the identified harm.
115. Furthermore, the development has failed to demonstrate that the site access is suitable for its intended use. It would also rely on a site access which passes through Flood Zone 3b (functional floodplain) which is contrary to the aims of the NPPF which states *inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk.*

116. Therefore, the proposed development would be in conflict with the development plan when read as a whole. There are no material planning considerations which indicate that the planning application should be determined otherwise than in accordance with the development plan.

117. It is therefore recommended for refusal.

Human Rights

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

List of Background Papers (not previously published)

Nil

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