



Appeal Decision

Site visit made on 13 May 2024

by A Hickey MA MRTPI

an Inspector appointed by the Secretary of State

Decision date: 18 June 2024

Appeal Ref: APP/Y2620/W/23/3334686

Shrublands Farm Camping site, Craft Lane, Northrepps, Cromer Norfolk NR27 0LL

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
 - The appeal is made by Mr Jeremy Yougman of Northrepps Farming Company against the decision of North Norfolk District Council.
 - The application Ref is PF/22/1708.
 - The development proposed is siting of 2 glamping pods for holiday use and creation of permissive footpath.
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Decision

1. The appeal is dismissed.

Preliminary Matters

2. The description of development and address cited in the planning application form differs to that contained within the decision notice and appeal form. In the interests of clarity, I rely upon the description and site address as set out in the decision notice as they more accurately describe the appeal scheme and site address.
3. During the appeal, the National Planning Policy Framework (the Framework) was revised. Its content in respect of the main issue has not been materially altered. Therefore, in this instance it has not been necessary to consult the parties on the revisions to the Framework.
4. On 22 November 2023, all designated Areas of Outstanding Natural Beauty (AONBs) in England and Wales became 'National Landscapes'. I have accordingly referred to the Norfolk Coast AONB as the Norfolk Coast National Landscape (NCNL) in my decision.

Main Issues

5. The main issues are:
 - whether the appeal site is a suitable location for the development having regard to the development plan and national policy;
 - the effect of the proposal on the character and appearance of the locality including the landscape and scenic beauty of the NCNL; and
 - the effect of the proposed development on highway safety.

Reasons

Suitable location

6. Policy SS 1 of the North Norfolk Core Strategy (NNCS) sets out the development strategy for the location of new development in North Norfolk. For the purposes of Policy SS 1, the appeal site is designated as countryside, where development will be restricted to particular types of development to support the rural economy, meet affordable housing needs and provide renewable energy. Policy SS 2 of the NNCS confirms that in areas designated as countryside, development will be limited to that which requires a rural location and is for one or more specified development types. The development types listed include recreation and tourism.
7. Policy EC 7 of the NNCS requires that new tourist accommodation and attractions be located in accordance with a sequential approach set out in the remainder of the Policy. Policy EC 10 sets out where new extensions of, or intensification of, existing static caravan sites and touring caravan and camping sites will be supported. On Policy EC 10 the appellant notes the appeal site is not comparable to the larger static sites. However, EC 10 deals with all new caravan sites or woodland lodge holiday accommodation regardless of size.
8. The main parties agree that the appeal site is used for caravanning and camping, albeit this is a certified site and does not benefit from formal planning consent. In my view, the scheme would be new development for the purposes of Policy EC 10 of the NNCS. This is because the evidence before me shows the certified site falls outside the scope of the Council's development plan, unlike the appeal scheme, which requires planning permission to be built and used onsite. As the site is within the NCNL it would therefore be contrary to Policies EC 10, EC 7, SS 1 and SS 2 of the NNCS.
9. In support of the scheme, the appellant states the development would diversify the existing farm business increasing revenue and would benefit the local economy by providing jobs and additional spending opportunities for local businesses as this type of holiday accommodation has become more popular. There is no substantive evidence to demonstrate the existing holiday pods to be relocated from within the farm site itself are lawful. However, even if I were to accept they are lawful as they already appear to be in operation, their relocation would not further diversify farm operations, create jobs or extend a rural business, and I attached limited weight to this matter
10. For the reasons above, the appeal site is not an appropriate location for the proposal having regard to the strategic objectives of the Council's development plan and the sustainable tourism requirements of the Framework.

Character and appearance

11. The appeal site is located within the NCNL, where, as set out in paragraph 182 of the Framework, great weight should be given to conserving and enhancing landscape and scenic beauty.
12. The site is located within the River Valleys Landscape Character Type, more specifically falling within the Mundesley Beck RV6 area (RV6) as identified in the North Norfolk Landscape Character Assessment (NNLCA) SPD. The characteristics and qualities unique to the River valleys landscape include, amongst other things, a variety of landscape elements and scenic views which

- includes small field sizes combining to provide intimacy and a strong sense of place.
13. The appeal site is accessed from Craft Lane. It comprises a rectangular field with a small gravel area with a short access track. The appeal site also shares its access with an adjoining field. The site is bound by trees at different densities but can be seen through gaps along Craft Lane.
 14. On my site visit, I observed no caravans or camping was taking place on the appeal site or adjoining field. There are only isolated features associated with the certified camping use on the site, such as the gravel access area, bins and small electricity connection boxes. In the adjoining field, a small cabin building providing washing facilities is also onsite. Given the limited scale of development and location of these features they did not spoil the tranquillity, intimacy or strong sense of place to this part of the NCNL, which contributes to the scenic beauty of the surrounding area.
 15. The adverse visual effect through the introduction of two glamping pods, with associated areas of decking and parking, would be relatively localised. However, the addition of two pods would add to the existing traffic levels, recreation pressures and light pollution, all of which detract from the prevailing landscape character in this part of the NCNL, eroding its key features.
 16. There is no substantive evidence to demonstrate that transient camping on-site is more harmful to the surrounding area, including traffic and general comings and goings, and the activities of users of the pods. Moreover, given the ease of not having to pack up and disconnect from services, I find occupiers of the pods are more likely to travel by private motor vehicle to nearby recreation sights and services/facilities, increasing traffic levels, light pollution and noise undermining the tranquillity of the surroundings and dark night skies later in the evenings. In the absence of any detailed traffic, noise or light level comparisons or substantive analysis, I am unable to conclude that the appeal scheme would conserve and enhance landscape and scenic beauty in the NCNL which have the highest status of protection in relation to these issues.
 17. I have read the appellant's grounds of appeal and acknowledge that the appeal site and adjacent field may, at times, contain caravans/motorhomes or other forms of camping pitches. The appellant also contends that the pods would result in no greater harm than when the site is occupied by campervans. However, these are not permanent features in the landscape that permanently harm the scenic beauty and special qualities of the NCNL, which would not be the case with the proposed development, which could be in use for a greater period of the year. Therefore, the harm identified would be likely to be enduring.
 18. For the reasons given above, the proposed development would cause harm to the character and appearance of the area and would neither conserve nor enhance the landscape and scenic beauty of the NCNL. Consequently, it would conflict with NNCS Policies EN 1, EN 2 and EN 4. These seek, amongst other matters, new development to reinforce local distinctiveness and be sympathetic to the special qualities of the NCNL. For similar reasons, the proposal also conflicts with the Framework, which states that great weight should be given to conserving and enhancing landscape and scenic beauty in national landscapes.

Highway Safety

19. The site is accessed from Craft Lane, which is a fairly straight single-track lane. It is bordered by banks and hedgerows for substantial parts of its length albeit widens on a short section with the nearby dwellings. As part of my visit, I observed that due to the absence of pedestrian facilities on Craft Lane, anyone walking or cycling on this road is required to share the carriageway with motor vehicles.
20. The evidence before me indicates that the nearest meaningful services and facilities are located at Northrepps which also contains bus stops to settlements beyond. Given the distances involved and the lack of pedestrian, wheelchair and cycle facilities, it is likely that the majority of trips would be undertaken by private motor vehicle.
21. The appellant suggests that the proposal would likely generate less vehicle movements particularly from larger vehicles such as motorhomes. However, while it is likely the size of vehicles may be smaller there is no detailed evidence before me to demonstrate the number of trips would be lower. Indeed, as I have found above, the occupiers of the pods are more likely to take their vehicles offsite.
22. To overcome the Council's concerns with regard to highway safety, the appellant has put forward an area of an adjoining field to be used as a permissive path along much of the length of Craft Lane. The delivery of the permissive path, subject to its acceptability in design terms, would offer a safe route for pedestrians and cyclists to access Northrepps. While there would be a need for pedestrians to use a short section of road to reach the new path, this would be for a short period of time on a section of the lane with good visibility and would not result in a hazard for users of this section of the road.
23. Furthermore, even if daily trips due to the pods use were greater than those connected with the certified camping use, there is nothing substantive before me to demonstrate that the overall net increase would be so significant as to have an unacceptable impact on highway safety, or to lead to severe residual cumulative impacts on the road network.
24. Given the good levels of visibility along the route, vehicles would be able to navigate the narrow width of Craft Lane as they would be able to pass each other outside of the existing dwellings close to the appeal site.
25. For the reasons given above, the development would not have a significant adverse effect on highway safety. As such, it accords with Policy CT 5 of the NNCS which requires that proposals provide for safe and convenient access for new developments.

Other Matters

26. The Conservation of Species and Habitat Regulations 2017 (the regulations) require the Competent Authority to consider whether or not the proposal could adversely affect the integrity of the protected sites, either alone, or in combination with other plans and projects. This responsibility falls to me in the context of this appeal. However, while noting the appellant's comment on the Section 111 payment as the appeal is being dismissed for the reasons set out, I have not considered this matter further.

27. I have had regard to support for the development including from the Council's economic team. However, this support does not outweigh the harm that I have identified.

28. I acknowledge that the appeal scheme is a revision of a previously refused scheme (Ref: PF/21/2263) at the site. Nonetheless this does not overcome the harms I have found above.

Conclusion

29. The proposal would not harm highway safety. Notwithstanding this and for the above reasons the development would not be suitably located and fails to conserve or enhance the NCNL. As a result, the proposal conflicts with the development plan when taken as a whole and there are no material considerations, either individually or in combination, that outweighs the identified harm and associated development plan conflict.

30. Therefore, I conclude the appeal should be dismissed.

A Hickey

INSPECTOR