

County Hall, Beverley, East Riding Of Yorkshire, HU17 9BA Telephone 01482 393939
www.eastriding.gov.uk
Stephen Hunt Head of Planning and Development Management

Mr Jonathon Benson
Benson Planning Studio
C4di @Thedock
Hull
HU1 1UU

Our ref 22/10295/PREP
Enquiries to: Mr Daniel Allen
E-mail: daniel.allen@eastriding.gov.uk
Telephone: (01482) 393845
Date: 20 June 2022

Dear Mr Benson,

Proposal:	Proposed erection of 6 holiday lodges and associated infrastructure
Location:	Land North East Of Waste Water Treatment Works, Hull Road, Great Hatfield, East Riding Of Yorkshire, HU11 4US
App Type:	Pre Application Planning Enquiry

I write further to your pre-application enquiry received on 18th March 2022 and can make the following comments. Please accept my apologies for the delay in the issue of this advice.

Background:

The proposed development concerns the change of use of land to the east of Hull Road, Great Hatfield, to comprise the erection of six holiday lodges and supporting operational development, access, parking, and landscaping. The site is located within the Countryside as defined within the East Riding Local Plan, adjoined to but outside of the settlement of Great Hatfield, classified as a Village within the Settlement Network of the Local Plan. The site does not comprise a statutorily or locally listed building and is not located within a conservation area. The site is within Flood Zone 1 and is shown to be at ‘very low’ risk of flooding from surface water accumulations. The site is within a Mineral Safeguarding Area, close to the Sigglesthorne Station Local Nature Reserve and within the impact risk zone of the Hornsea Mere Site of Special Scientific Interest (SSSI).

Planning Considerations:

Planning applications are determined in accordance with the Development Plan unless other material considerations indicate otherwise. In this instance the Development Plan comprises the National Planning Policy Framework (NPPF) and the documents making up the East Riding Local Plan, most notably the Strategy Document (ERLP SD) (2016).

Principle of Development

The enquiry site is considered as being within the ‘Countryside’ for planning policy purposes.

Paragraph 84 of the NPPF states that planning decisions should [inter alia] enable ‘(a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings’, and in (c) identifies the provision of sustainable tourism and leisure developments as a component in supporting a prosperous rural economy, provided that such development ‘respect(s) the character of the countryside’.

Policy S4 of the ERLP SD affords support for development which helps maintain the vibrancy of the Countryside where it is of an appropriate scale. The policy, in sub-section C, outlines the limited

Alan Menzies
Director of Planning and Economic Regeneration

forms of development able to be supported within the Countryside provided that they respect the intrinsic character of their surroundings, this includes (C.11) proposals for tourism development.

Policies EC1 and EC2 of the ERLP SD also include provisions which reflect these requirements, in order to help strengthen and broaden the tourism offer across the East Riding and support the expansion of existing businesses. Sub-section B of Policy EC2 specifically lends support to tourism developments, provided that their scale and cumulative impact is appropriate for their location, and they [inter alia]: *'involve new... static and touring caravan sites; support an existing countryside attraction; or; have a functional need to be located in the Countryside (providing existing buildings are re-used where possible)'*. Table 6 of the ERLP SD suggests that within the East Coast Tourism Character Area there is a requirement for *'new small-scale accommodation enterprises focused on serviced and self-catering units in the form of farm building conversions, additional camping and touring caravan pitch provision'*.

The scheme would not utilise any existing buildings nor does it appear to form part of a farm diversification scheme. Whilst sub-section B.2 of Policy EC2 does support new caravan sites within the Countryside, it is not clear from the details provided that the form of accommodation proposed could be considered acceptable under this provision. Any lodge, which could be considered as a building to be used for visitor accommodation, would not fall within this exception specified within Policy EC2. However a temporary structure, within the definition of a caravan, could be afforded support in principle under the provisions of Policy EC2 (B.2) as a new caravan site, subject to compliance with relevant provisions of the Council's development plan, and other materials considerations raised. In this respect, careful consideration should be afforded to the nature, scale, and siting of operational development associated with such accommodation and uses of land.

Whilst the scheme does not support an (obvious) existing countryside attraction a case is made within the supporting statement that the proposals have a functional need to be located in the countryside in order to provide accommodation for visitors to the area who 'come to experience the heritage, wildlife and scenery of the surrounding countryside and coast which are tourist attractions in themselves'. As stated within paragraph 7.24 of the ERLP SD supporting Policy EC2 as part of any planning application *"Proposals for tourism developments that... have a functional need to be located in the Countryside, will need to submit information. This should demonstrate...why it has a functional requirement to be situated in the location proposed. In addition, it should include information about the uses or activities that would take place within the new development, and...why they necessitate a Countryside location. A demonstrable benefit for the tourism sector must be established to justify the development of new buildings in the Countryside.* At this time, it is considered that insufficient information has been submitted within the supporting statement to satisfy officers that the development proposal would accord with the aforementioned provisions.

Echoing NPPF paragraph 84, policies S1 and S2, and supporting para.7.21 of Policy EC2, of the ERLP SD advise that, owing to the rural nature of the East Riding, access to tourism facilities will often be by private car. As a consequence, consideration needs to be given to Policy EC4. This policy seeks to increase overall accessibility, minimise congestion and improve safety, by supporting development that is accessible, or can be made accessible, by sustainable modes of transport (A).

The proposed development would conflict to some extent with the aims of Policy EC4 insofar as it would not strictly support or encourage sustainable travel options given that the site is within the countryside and is not readily served by buses or trains, with the adjacent settlement of Great Hatfield lacking any depth of supportive services and with many local roads narrow, rural, unlit and not benefitting from segregated footways. This is true of the adjacent section of Hull Road linking the site to the settlement, which does not benefit from a segregated footway. Policy EC2 is however explicit in saying that regard should be had to the aims of EC4 *'wherever this is possible'* and the NPPF does recognise that opportunities to maximise sustainable transport solutions will vary between urban and rural areas. Accordingly, were you to proceed with an application for planning permission, it is advised that it also be accompanied by justification that seeks to outweigh the conflict with policies S2 and EC4, which may perhaps be achieved through the demonstration of compliance with other policy provisions, such as those under Policy EC2 (sub-section B.4) if, for example, it can be justified that the proposals have a functional need to be located in the countryside.

Character, Appearance, and Amenity

Policies S4 and EC1 of the ERLP SD follow in the thrust of relevant provisions of the NPPF, to include paragraph 84, and are supported by Policy ENV1 of the ERLP SD which, in the spirit of paragraphs 130 (a, b, and c) and 170 (b) of the NPPF, requires, amongst other matters, development to have regard to the specific characteristics of the site's context and the character of the surrounding area, incorporating landscaping alongside boundary treatments of an appropriate scale, to enhance the setting of buildings and views. Policy ENV2 of the ERLP SD adds that development proposals should be sensitively integrated into the existing landscape, where possible, seeking to make the most of the opportunities to protect and enhance landscape characteristics and features.

Notwithstanding the concerns raised above in respect of the principle of development, if tourism accommodation is able to be supported on this site then, subject to detailing, it is considered that appropriately scaled accommodation, with minimal incidental features or paraphernalia, screened by a landscaping scheme (along the Hull Road frontage and within the site), could successfully assimilate into its surroundings. Notwithstanding the unacceptable scale and form of the buildings proposed within the initial submission, Officers would also raise concern with the formal and rigid arrangement/layout of the accommodation and associated operational development (as shown within the 'contextual layout'). Subsequent to the provisions of amended/additional information, no details of the layout of the site have been provided. As such, before further comments could be made, details would be required of the site layout and the screening to be provided, to fully consider the scale of the proposed structures and better understand their relationship with the established landscape features as well as views from public vantage points and neighbouring properties. Although there is no objection in principle to the accommodation units having a modern or contemporary appearance and external material finish, this would be subject to a development proposal otherwise according with relevant provisions of policies S4, ENV1, and ENV2. As such, any future planning application should seek to reduce the visual impact of the development through: the siting (spacing) of the proposed accommodation; by reducing the extent of associated operational development (decking, etc.); and; by reducing (as far as possible) supporting infrastructure (e.g. access and parking areas). As noted above, incorporating additional native landscaping to the site boundaries and within the development site would not significantly impact on wider views within the landscape, with the added benefit of providing biodiversity enhancements on the site.

In the interests of ensuring that the dark quality of the rural landscape at night, and allow for consideration of the impact of the proposal and any external lighting upon the nationally designated sites for nature conservation (see below) as well as the amenities of neighbouring properties, details of any external lighting should be provided within a Lighting Assessment (refer to the Council's Validation Checklist for detailed advice) to show how this would be controlled to an acceptable level.

The site does not comprise any existing built forms and, on the basis of the details provided, does not appear to be associated with any adjacent dwellinghouse. It is sited to the south and south-west of neighbouring residential properties along Main Street, with intervening boundary treatments predominantly comprising hedgerow, shrub, and tree planting. Whilst limited details of a proposed site layout have been provided, it is likely that an appropriately scaled and sited development of a limited number of accommodation units would, having regard to the likely separation afforded to the nearest neighbours and presence of intervening landscape/boundary screening would not give rise to any undue loss of daylight/sunlight, outlook, or privacy to these occupiers. However, the proximity of the nearest neighbours does warrant careful consideration in respect of the layout of the site, to avoid an adverse increase in noise and other disturbance from comings and goings and other activities associated with the use of the site. A final assessment in respect of amenity would be subject to the submission of further detail of the scheme, and consultation with neighbouring occupiers and other interest parties undertaken during the course of a full planning application.

Highway Safety, Access, and Parking

Given the concerns raised with the principle of the development, this enquiry has not been subject to review by the Council's Highway Development Management section. Should you however wish to

progress with an application despite the response of this enquiry, please let me know if you would like me to obtain the Highways Officers comments prior to the submission of an application.

Notwithstanding the above, limited details of the proposed access and parking arrangements for the development have been provided. Whilst the supporting statement makes reference to updating the established field access, its position to the south-west corner of the site does not correspond with the more central position of what appears as the proposed access shown on the 'contextual' drawings.

The position of the existing field access (and possibly any proposed central access) fall outside of the 40mph speed restricted area, with the adjacent highway subject to national speed limits.

Without prejudice to any future assessment by the Highway Development Management section, subject to the development being otherwise considered acceptable in respect of the access arrangements and highway safety, the existing field access would not be considered appropriate for anything other than occasional use and therefore the existing (or any alternate access to the site) would need to be improved with respect to its construction and layout to the Council's specification. In respect of parking arrangements, for 6 holiday units, parking should be provided for a minimum of 6 cars, with sufficient space to turn within the site to allow entry and exit in a forward gear. Secure cycle parking should also be shown, and it is advised that an electric vehicle charging point also be provided. Consideration should be afforded to the type and size of any vehicle servicing the site and should ensure that the access road and turning facilities are suitable for these type of vehicles.

In the absence of clear details of the proposed arrangements, which would need to be subject of consultation with the Highway Development Management section, it is not possible to provide any further comments at this time as to whether any proposed access arrangements can be considered acceptable in respect of highway safety, or whether the scheme would accord with the minimum parking requirements outlined within the Council's Sustainable Transport SPD (2016).

Trees and Landscaping

The boundaries to the site, most notably the southern boundary, comprises well-established hedgerow and tree planting. Within the site, landscaping appears to comprise grassland and scrub shrubs and hedges. Were you to proceed with an application for planning permission this should be accompanied by a tree survey and assessment (commensurate to the development) detailing which trees are to be retained (and details of protective measures) and which (if any) are to be removed as part of any development proposal, along with details of replacement planting to mitigate their loss. Notwithstanding the request above that any future planning application be accompanied by a sufficient details of a proposed landscaping arrangement to aid the schemes assimilation into its Countryside setting, it is preferred that existing landscaping features are retained, or if removal is required, it would be expected that equivalent replacement provision is made as a minimum.

Nature Conservation

The site is to the east of Siggleshorne Station designated Local Nature Reserve and within the impact risk zone of the Hornsea Mere Site of Special Scientific Interest (SSSI). Given the proximity of the proposal to this and other nationally and locally designated sites, and having regard to the nature of the site subject of this enquiry, comprising open grassland, tree and hedgerow planting to the site boundaries, there is the potential for the site and its surroundings to provide for and support protected species and their habitats.

As such, any future application for planning permission will be subject to review by the Council's Sustainable Development (Biodiversity) and Nature Conservation sections and should therefore be accompanied by information in respect of ecological and biodiversity interests of the site (Biodiversity Survey and Report – refer to the Council's Validation Checklist for detailed advice). Such information will allow the Council to determine if the development is likely to affect protected species and/or their habitats. Please note that if further assessment is deemed necessary following the undertaking of an initial Biodiversity Survey and Report (i.e. there is a need for further protected species survey) then these may be subject to survey timing and/or other seasonal constraints.

Flood Risk and Drainage

The site is located within Flood Zone 1, at low risk of flooding from rivers or the sea, and within an area identified as at 'very low' risk of surface water flooding. On the basis of the details submitted with the enquiry, the site is above 1 hectare in area. Accordingly a Flood Risk Assessment would be required, and the application would be subject to consultation with the Environment Agency.

No details of foul and surface water drainage have been provided with the enquiry. It is unclear whether connection to a mains foul sewer is available or possible, or if it would be dependent on an on-site treatment plant. The appropriateness of foul drainage infrastructure will be subject to the review of Yorkshire Water and the Council's Land Drainage section and other consultees as relevant undertaken during the course of any formal application for planning permission.

No details are provided as to whether the pathways and vehicle access road would be constructed in permeable materials and there is little further information accompanying the enquiry to ascertain whether the proposals would result in an increase in impermeable surface or whether surface water drainage arrangements are proposed. If so, surface water should be drained via on-site filtration and where appropriate, the use of sustainable drainage systems. If this is proven to be unfeasible for the site (to be demonstrated by undertaking and submitting the results of percolation tests), drainage to a watercourse should be explored and discharge to any mains drainage considered only as a last resort. A foul and surface water drainage strategy would be required with any future planning application.

Mineral Safeguarding Area

The site is located within a Minerals Safeguarding Area, and any future application for planning permission would therefore fall to be considered against the provisions of Policy EC6 of the ERLP SD and the Joint Minerals Plan (2019). Non-mineral development, which would adversely affect the viability of exploiting the underlying or adjacent deposit in the future, will only be supported where it can be demonstrated that the underlying or adjacent mineral is of limited economic value; or if the non-mineral development can take place without preventing the mineral resource from being extracted in the future, or is temporary in nature; or the need for the development outweighs the need to safeguard the mineral deposit. Should you pursue this development proposal to a full planning application, then it is advised that this matter is considered within any supporting statement.

Other Matters:

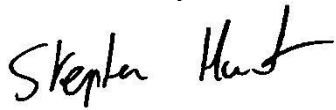
Notwithstanding this advice, please see the attached documents which sets out the key Development Plan policies that are of relevance, and what would be required should you choose to submit an application for the proposed development.

You may also need permission under the Building Regulations. Local Authority Building Control is wholly independent, non-profit making service that operates only to protect and look after your interests. The service operates from regional offices in Beverley, Bridlington and Goole so help and advice is always available and enables us to offer same day inspections for requests made prior to 10am. All the details of the Building Regulation Approval service, and the relevant application forms, are available at <https://www.eastriding.gov.uk/buildingcontrolservices/>. You can also contact Building Control at building.control@eastriding.gov.uk or by calling the Building Control helpdesk on 01482 393800.

Please note that while every effort is made to ensure that the advice given is as accurate as possible, I must advise you that the contents of this letter are the informal opinion of an Officer and cannot prejudice the outcome of a formal application for planning permission. Planning applications are subject to consultation processed and any responses have to be taken into consideration prior to a decision being made. Please also note that in the interests of transparent decision making, if you progress to make a planning application for this proposal then this pre-application advice will be made available by the Council in the public domain. Until then, however, the advice will remain confidential and will not be disclosed by the Council.

I trust that this information is satisfactory, should you wish to discuss these matters further please do not hesitate to contact this office.

Yours sincerely

A handwritten signature in black ink that reads "Stephen Hunt". The signature is written in a cursive style with a long horizontal stroke at the end of the name.

Stephen Hunt MRTPI
Head of Planning and Development Management

Advice for 22/10295/PREP

Key Development Plan Policies	
<p>These are the key local plan policies against which your application will be considered.</p> <p>Your proposal will also be considered against guidance in the NPPF and the Planning Practice Guidance (PPG)</p> <p>You can view the Local Plan in the councils website at https://www.eastriding.gov.uk/planning-permission-and-building-control/planning-policy-and-the-local-plan/</p>	<p>East Riding Local Plan Strategy Document (2016) S1: Presumption in favour of sustainable development S2: Addressing climate change S4: Supporting development in villages and the countryside S8: Connecting people and places EC1: Supporting the growth and diversification of the East Riding economy EC2: Developing and diversifying the visitor economy EC4: Enhancing sustainable transport EC6: Protecting mineral resources ENV1: Integrating high quality design ENV2: Promoting a high quality landscape ENV4: Conserving and enhancing biodiversity and geodiversity ENV5: Strengthening green infrastructure ENV6: Managing environmental hazards</p> <p>Other Relevant (ERYC) Documents Sustainable Transport SPD (2016) Tourism Accommodation Study (2016) Planning for Tourism Accommodation: A Guidance Note for Developers (2011)</p> <p>East Riding of Yorkshire Council and Hull City Council Joint Minerals Plan (2019)</p>

Validation Requirements	
<p>These are the items from the Council's Local List that you need to submit with your application for it to be registered as a valid application.</p> <p>These are in addition to the national requirements (application form, certificates, fees and plans).</p> <p>You can find more guidance on each of these requirements in the Validation Checklist which is available on the Council's website at https://eryc.link/planning-permission-prior-approvals</p> <p>Fees can be calculated on the Planning Portal at https://1app.planningportal.co.uk/FeeCalculator/Standalone?region=1</p>	<p>Local List validation requirements</p> <p>Flood Risk Assessment; Foul and Surface Water Drainage Assessment; Biodiversity Survey and Report; Wildlife Enhancement Plan (optional) Lighting Assessment; Tree Survey and Arboricultural Impact Assessment (proportionate to the scale and nature of the development proposal); Mineral Assessment.</p>