

**Parish: Great Ayton**  
**Ward: Great Ayton**  
**10**

Committee Date: 23 June 2016  
Officer dealing: Mrs B Robinson  
Target Date: 25 January 2016

**15/02420/FUL**

**Change of use of agricultural land to holiday lodge park with associated solar farm, landscaping and amenity ponds, formation and alteration of highway access and internal roads, construction of office/hub building and associated car parking at Angrove Park, Winley Hill, Great Ayton for Mr Alan Petch**

## **1.0 SITE DESCRIPTION AND PROPOSAL**

### Site Description

- 1.1 The site is an area of 29.3 ha of arable land, approximately 1.5 km west of Great Ayton. The boundary with Yarm Lane is approximately 150 metres long. The land extends south-west approx. 600 metres towards woodland at Tile Shed Plantation and approximately 800 metres (maximum) southwards to the River Leven, which forms the main southern boundary. The site is approximately 300 metres from the A173 to the south. Some field boundary hedges are present within the site. There is an informal field track east-west through the site from Yarm Lane to Winley Hill Farm.
- 1.2 The site lies approximately 400 metres west of Low Green dwellings. The nearest residential properties in the surroundings are:
- The Grange, approx. 140 metres east of the site;
  - Field House, approx. 360 metres north east ;
  - East Angrove, approx. 140 metres south east;
  - Angrove Farm, approx. 400 metres north west ;
  - Angrove North Farm approx. 500 north; and
  - Bartle Bridge Farm approx. 460 metres north
- 1.3 The land rises gently from the River Leven towards the north east, with some shorter, steeper rises along the northern bank of the river, particular on the south west side.
- 1.4 A public right of way lies along the north bank of the river, follows the boundary of the site to the south-east corner, and exits the site at the mid-point of the eastern boundary, before exiting approximately 350m further on, on Yarm Lane to the north of the application site.
- 1.5 Great Ayton Sewage Treatment Works is located immediately over the River Leven from the south-west corner of the site.
- 1.6 Within the wider surroundings the site lies approximately 3 km west of the nearest point of the North York Moors National Park.

### Proposal

- 1.7 The proposal is a holiday park with 179 residential units in the form of timber clad (or timber appearance) lodge style cabins, meeting the definition of a caravan, each with an attached deck area.
- 1.8 The proposed layout plan shows the caravans arranged in clusters of 20-30 units (average), within a partially restored and partially new field pattern. The proposed layout shows individual field hedge lines restored where necessary, and new planting within the site and as a buffer along Yarm Lane, to the north of the site, and along the

east boundary. The proposed landscape planting includes semi natural woodland, structure planting and native hedgerow with hedgerow trees.

- 1.9 A number of amenity ponds are included within the layout.
- 1.10 The vehicular access to the site is intended to be via a new access road from the A173 to the south, with a new bridge over the River Leven. There would be a further access for emergency use from the north east corner, to Yarm Lane. Internally there would be an east-west spine road across the site.
- 1.11 Also proposed is a central hub with overall dimensions of 22m x 12m. The proposed building is single storey, with an asymmetric roof and timber clad exterior. The interior is laid out with a reception/office area and facilities including a shop, café, and cycling/fishing equipment hire.
- 1.12 The application makes reference to a proposed cycleway between Stokesley and Great Ayton and proposes to ensure a protected strip of land for the cycle route to be constructed in the future.
- 1.13 A Transport note submitted in the later part of the life of the application suggests measures to improve highway safety along Yarm Lane for pedestrians and cycles.
- 1.14 The application as submitted includes:
- Landscape and Visual Impact Assessment;
  - Flood Risk Assessment;
  - Travel Plan;
  - Tourism and Economic Impact Assessment;
  - Drainage Strategy; and
  - Ecology Report
- 1.15 In the course of the application, additional details have been submitted on agricultural land classification quality, and additional ecological surveys.

## **2.0 RELEVANT PLANNING AND ENFORCEMENT HISTORY**

- 2.1 10/02544/FUL Change of use of agricultural land to a camp site consisting of 10 pods and a portable shower block and portable toilet block. Granted 4 February 2011
- 2.2 15/01264/FUL Retrospective application for change of use of agricultural land to a campsite, siting of a steel container, barbeque pod and three camping pods pavilion building and ancillary structures. Granted 2 October 2015

## **3.0 RELEVANT PLANNING POLICIES**

- 3.1 The relevant policies are:

Core Strategy Policy CP1 - Sustainable development  
Core Strategy Policy CP2 - Access  
Core Strategy Policy CP4 - Settlement hierarchy  
Core Strategy Policy CP15 - Rural Regeneration  
Core Strategy Policy CP16 - Protecting and enhancing natural and man-made assets  
Core Strategy Policy CP17 - Promoting high quality design  
Core Strategy Policy CP18 - Prudent use of natural resources  
Core Strategy Policy CP21 - Safe response to natural and other forces  
Development Policies DP1 - Protecting amenity  
Development Policies DP3 - Site accessibility  
Development Policies DP4 - Access for all  
Development Policies DP6 - Utilities and infrastructure

Development Policies DP8 - Development Limits  
 Development Policies DP9 - Development outside Development Limits  
 Development Policies DP16 - Specific measures to assist the economy and employment  
 Development Policies DP25 - Rural employment  
 Development Policies DP26 - Agricultural issues  
 Development Policies DP28 - Conservation  
 Development Policies DP30 - Protecting the character and appearance of the countryside  
 Development Policies DP31 - Protecting natural resources: biodiversity/nature conservation  
 Development Policies DP32 - General design  
 Development Policies DP33 - Landscaping  
 Development Policies DP34 - Sustainable energy  
 Development Policies DP36 - Waste  
 Development Policies DP37 - Open space, sport and recreation  
 Development Policies DP38 - Major recreation  
 Development Policies DP39 - Recreational links  
 Development Policies DP43 - Flooding and floodplains  
 National Planning Policy Framework - published 27 March 2012

#### **4.0 CONSULTATIONS AND REPRESENTATIONS**

- 4.1 Great Ayton Parish Council - Members expressed concerns about the size of the proposed development and the fact that it is not included in the Local Development Framework. They were also concerned about the increase in vehicles and the loss of prime agricultural land.

Further comment – query location of proposed solar farm. (Response sent, explaining location)

- 4.2 Stokesley Town Council - This council supports this application in principle. However a number of issues require resolution/confirmation of acceptability. These include access/egress from the site onto both the A173 and Yarm Lane and pedestrian access to Great Ayton. Wildlife/environmental impact and consistency with the proposed Great Ayton to Stokesley business park cycleway, plus contributions as required to other local infrastructure. The employment opportunities are welcomed but number of full time (jobs) is questionable.

Further comment 5 January 2016 - Stokesley Parish Council have concerns that it starts to form a corridor with Great Ayton with all the associated infrastructure issues plus the following caveats:

- That there is a restrictive covenant regarding the use, to prevent this being a precursor for change of use from holiday to permanent residential;
- That the access to Yarm Lane has a more permanent barrier than cones, but which is suitable for emergency access (gate or similar);
- That the landowner and developer make a clear contractual commitment to actively support the Cycleway project to connect Stokesley and Great Ayton and make it an integrated part of the scheme, and this is part of phase 1;
- That the 'bus stop improvements' are quantified and supported by appropriate improvement in bus services;
- That the position of the neighbouring landowner between Angrove Park and Stokesley is resolved to ensure the cycleway can be completed all the way to Stokesley;
- That a very clear description of all the permanent roles expected to be generated as part of the scheme, both numbers and type of jobs/typical salary, and how many of these are on site and how many are in the supply chain, is supplied; and

- That detail of the style and type of buildings is provided, especially with regard to environmental impact. Having green/low carbon developments of this type could be very beneficial.

#### 4.3 Public Comments – 134 objections have been received, summarised as:

- Effect on natural habitats, rural surroundings and enjoyment of footpaths;
- Loss of buffer between Stokesley and Great Ayton;
- Loss of best quality agricultural land;
- Alternative location preferred (off A19 at Exelby Services);
- Light pollution;
- Effect on local drainage;
- Traffic and highway and pedestrian safety;
- Parking congestion implications in Great Ayton;
- Visitors are unlikely to use public transport;
- Size – justification, and in proportion to Great Ayton;
- Precedent for use as a housing estate;
- Overloaded infrastructure;
- Existing provision of holiday accommodation is sufficient;
- Economic benefit to local business is doubted;
- Harm to existing business, including B&B accommodation, restaurants etc.;
- Jobs will be seasonal and low paid;
- Law and order issues;
- Previous refusals nearby;
- Query whether the bund is feasible.
- Difficulty of monitoring 'year round' occupation;
- Fails to deliver the cycle way;
- Challenge to the landscape assessment and economic benefits methodology; and
- Highway alterations (transport note) will not work and would have a negative effect.

65 statements of support have been submitted, summarised as:

- The development is needed by the area;
- Jobs and trade would be beneficial to local economy, including tourist attractions;
- Shortage of holiday lodges locally;
- Tourism should be encouraged;
- The spacious layout would minimise harm;
- The size is justified to enable economic benefit;
- Advantages of the cycle route;
- New planting would be beneficial to wildlife and enhance the natural environment;
- The downsides e.g. pressure on parking, are outweighed by the benefits;
- Preferable to large new housing development in Stokesley; and
- Suggest the footpath/cycle way be upgraded to a multi-use track.

#### 4.4 Environment Agency – No objections, condition requested re: bridge.

#### 4.5 Ramblers –

- Despite several minor palliatives the development will be unpleasant to view and out of scale with its surroundings;
- Danger of alternative uses arising from low usage in winter;
- The footpath is a popular riverside walk, though work is required to walk a definitive line; and

- Presumed that cycleway will be north and separate from the riverbank section of the footpath and a different surface by separate order.
- 4.6 Natural England – Advises that the development is “not likely to result in significant impacts on statutory designated nature conservation sites or landscapes”. Declined to comment on the issue of the agricultural land quality assessment, advising that the Council has the scope to take soils into account as appropriate.
- 4.7 Northumbrian Water – No issues to raise, provided that the works are carried out in strict accordance with the document “Drainage Strategy”. For information, attention is drawn to the nearby sewage treatment facility and that odour and noise can never be truly eliminated, if the facility is to carry out its function on which Great Ayton depends.
- 4.8 Yorkshire Wildlife Trust - Holding objection issued December 2015, identifying areas for further investigation outlined and making suggestions for positive enhancement.
- Further advice on additional submissions is awaited.
- 4.9 NYCC Heritage (Countryside) – refer to potential for screening for impact on protected sites, protected species and suggest biodiversity enhancements.
- 4.10 NYCC Highway Authority – (The authority is currently in discussion with the applicant concerning the proposed measures to improve highway safety for pedestrians and cycles along Yarm Lane and final advice is expected after those discussions have concluded.)
- 4.11 NYCC Rights of Way officer – Informative on public right of way requested.
- 4.12 NYCC Heritage (Archaeology) – Request a survey pre-decision.
- 4.13 Lead Local Flood Authority (NYCC) – No objection, condition requested.
- 4.14 Sustrans - Comments that their feasibility study for Endeavour Way notes that traffic calming facilities are required on Yarm Lane. Requests a 5 metre corridor on the south and eastern boundary is protected from development for the creation of the Endeavour Way. Suggest a condition requiring construction of the Endeavour Way from the entrance to the development to Yarm Lane.
- 4.15 Environmental Health Officer – notes proximity to sewage works and that Northumbrian Water should be consulted.

## **5.0 OBSERVATIONS**

- 5.1 The first consideration is to determine whether, in principle, the proposed development accords with the planning strategy and policies for Hambleton, as set out in the Local Development Framework, particularly in respect of the site’s location beyond the Development Limits of any settlement. Following that, it is necessary to consider the likely impact of the proposal in terms of (i) farm diversification and contribution to the rural economy; (ii) the loss of agricultural land; (iii) flood risk; (iv) landscape impact; (v) the character of the countryside; (vi) wildlife and biodiversity; (vii) residential amenity; (viii) design; and (ix) highway safety.

### Policy Principle

- 5.2 The site is a rural location where, under policies CP1 and CP2, development will not normally be supported unless an exceptional case can be made. Policy CP4 sets out criteria where an exception may be considered, including where (under criterion i) “it is necessary to meet the needs of farming, forestry, recreation, tourism and other enterprises with an essential requirement to locate in a smaller village or the

countryside and will help to support a sustainable rural economy". Tourism accommodation of this type, including holiday lodges intended to offer the benefits of rural surroundings, is considered to have an essential requirement for a rural location, and accords with the Local Development Framework policy in principle.

- 5.3 Policy CP4 does not qualify the exception for tourism development by reference to the scale or type of development, which are more appropriately considered in relation to the policies covering the considerations outlined in paragraph 5.1. Any exception under policy CP4 must also rely on an exceptional case being made in terms of policies CP1 and CP2.
- 5.4 As a potential exception to CP1 and CP2, the application is to be considered in terms of the overall sustainability of its location. In this case the site is close to a large village (Great Ayton, designated a Service Village in the Council's Settlement Hierarchy) where there is a good range of services as well as tourist attractions, and to a market town (Stokesley, designated a Service centre in the Settlement Hierarchy). The site is within easy reach of the urban conurbations of Teesside and recreational opportunities within the North York Moors National Park. There are regular bus services (services 28a, 81 and X80-X89) between Great Ayton and Stokesley, and access to onward public transport including Teesside and the coast. A railway station approximately 1 mile from Great Ayton serves the Esk Valley railway between Middlesbrough and Whitby. Overall, and considering the likely extent of private car use by tourists, the site location is considered to be a sufficiently sustainable location to be an exception for tourism accommodation under CP1 and CP2.
- 5.5 The National Planning Policy Framework (NPPF) offers support to sustainable rural tourism and leisure developments that benefit business in rural areas, communities and visitors and which respect the character of the countryside. This includes support in appropriate rural locations where identified needs are not met by existing facilities. The degree to which this proposal would respect the character of the countryside is considered later.
- 5.6 The submitted details include a Tourism and Economic Impact report which shows the site to be in a good location relative to the competition and type of tourism offer and notes that demand is strong for high quality operations and properties. The report further shows that lodges, log cabins and barn conversions are effective businesses in the area and also that the holiday rental sector is performing well, with North Yorkshire doing better than other areas. The report refers to the well-established economic benefits of tourism as a whole, and that self-catering accommodation is particularly important in the economies of rural areas. The statement is supported by a note from Hoseasons stating that it is their experience that demand is outstripping supply in the area around the North York Moors. The application does not demonstrate a specific need for a site of this capacity, however the applicant has drawn attention to the economics of scale in providing the site and bearing in mind the focus of the NPPF on economic growth, the large-scale proposal can be considered on its merits. The likely environmental impacts of the proposal are considered later.
- 5.7 For the above reasons, the proposal is considered to be in accordance with the principles of the Local Development Framework (LDF) and the NPPF in relation to tourism development. Whether the proposal would achieve accord with all policies of the LDF or achieve full compliance with the NPPF is dependent on further assessment with particular regard to the scale of the development and its likely impact on the area. The relevant considerations, identified in paragraph 5.1, are examined below.

Farm diversification and contribution to the rural economy

- 5.8 Development Plan policy CP15 supports “appropriate tourism related initiatives” and recreation uses appropriate to a countryside setting. Visitor accommodation utilising the special qualities of a natural setting within the countryside, and which by its nature could not be provided in an urban setting, can be appropriate in this setting, subject to other relevant policies.
- 5.9 Policy DP26 encourages farm diversification that helps to sustain existing agricultural enterprises. The NPPF supports the sustainable growth and expansion of all types of business in rural areas, promotes the development and diversification of agricultural and other land-based businesses, and supports sustainable rural tourism and leisure developments that benefit business in rural areas, communities and visitors, and which respect the character of the countryside.
- 5.10 Due to its proximity to services and facilities in Great Ayton and Stokesley the location is considered sustainable in principle for a rural tourism use. Tourism is generally accepted as having the potential to make a significant contribution to the rural economy and the development is therefore in accordance with the principles of the NPPF.
- 5.11 In terms of farm diversification, the enterprise would use a small proportion of the farm holding. Specifically, the applicant has confirmed that the applicant owns 129ha and the total holding is 396ha. The proposed holiday park would thus occupy around 7% of the holding, and agriculture would remain the major activity in area terms. However, as noted above, policy CP15’s support is for appropriate tourism development and it must therefore be determined whether this is an appropriate form and scale of tourism development. The scale of the proposal, covering 29.3 ha and comprising 179 lodges, is larger than any equivalent development within the District to date. The largest scheme to date, at Crosslands near Seamer, comprised 100 caravans within a holiday park but was on previously-developed land that had been an egg production and packaging plant (application 11/00813/FUL, not yet implemented). Members will recall that a smaller proposal, comprising 46 holiday lodges and a clubhouse near Sutton on the Forest (application 14/02450/FUL) was refused permission in October 2015. The impact of this scale of development, including the activity associated with it, is considered in terms of loss of agricultural land, flood risk, landscape impact, the character of the countryside, wildlife and biodiversity, residential amenity and highway safety as set out below.

#### Loss of Agricultural Land

- 5.12 Paragraph 112 of the NPPF requires the Council to take account of the economic and other benefits of the best and most versatile agricultural land (defined as grades 1, 2 and 3a). It also states, “Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.” This is reflected in LDF policy CP16 (protecting and enhancing natural and man-made assets), which states that “development or activities will not be supported which ... has a detrimental impact upon the interests of a natural or man-made asset.” Best and most versatile agricultural land is considered to be such an asset.
- 5.13 The land has been assessed in detail and the submitted report states that the land is in grades 3a (32%), 3b (44%) and 4 (24%). Nearly a third of the site (9.376 hectares) is therefore considered ‘best and most versatile’, albeit at the lower end, and would result in an unacceptable loss of a natural asset contrary to policy CP16 and NPPF paragraph 112.

#### Flood risk

- 5.14 The site includes an area of flood risk along the south side of the site, associated with the River Leven and the proposed development is sited so as to avoid these areas. The Environment Agency does not object to the proposed development. The proposal includes a drainage strategy with internal swales that satisfies the requirements of Northumbrian Water. Subject to details, which could be controlled by condition, the proposal would not therefore increase the risk of flooding in the vicinity of the application site or elsewhere in the catchment.

#### Landscape Impact

- 5.15 The proposal introduces extensive new development into an open rural landscape. The issues to consider with regard to landscape impact are the extent to which the development impacts on the wider surroundings and the extent to which it interferes with the experience of users of the countryside, particularly footpath users, and its effect on the openness and intrinsic character and quality of the landscape, as required by policy DP30.
- 5.16 The existing landscape is agricultural in nature, with irregular fields contained in part on the east side by a block of woodland, and on the south by the River Leven and the associated medium height woody growth along its banks. East of the site there are further blocks of woodland on the outskirts of Great Ayton. The immediate surroundings of the site are effectively contained within the neighbouring roads to the north and south beyond which the rural landscape extends south and eastwards to the North York Moors which forms a strong natural feature and northwards towards the flat agricultural land south of the Teesside conurbation.
- 5.17 An independent landscape consultant (Landcare) was engaged to review the proposal. The Landcare report notes the submitted Landscape and Visual Impact Assessment (LVIA) is essentially fair and accurate, and notes that the site benefits from some existing screening. The character of the proposed mitigation planting was considered to fit in with the overall landscape character. In terms of footpath users, Landcare advises that particular care would be needed on the south side of the development. Some visibility of the site is noted from nearby roads and footpaths to the south, and also that this would be at a distance. The report accepts that there are no long distance views of any significance.
- 5.18 In response to issues raised in the report, the applicant has provided a phased plan of implementation with a stated intention to provide all new planting at the outset of development. By these means the most exposed areas to the north would have a measure of benefit from established planting, which would increase over time. The applicant has agreed in principle to appropriate positioning of the screen planting to ensure a continuing feeling of openness for footpath users, and to preserve important viewpoints.

#### Character of the Countryside

- 5.19 Separate from the question of how the proposal would sit within the landscape, which is primarily a visual matter, it is necessary to consider whether the proposed development, by reason of its nature and scale and associated activity, would have any impact on the character of the countryside.
- 5.20 Whilst the location is relatively well protected from general public view and the wider landscape, the existing agricultural surroundings in this area are intrinsically quiet and tranquil in character and thus sensitive to development. The site is unusually large for this type of land use within Hambleton, and it is necessary to take into consideration whether the extent of the use would itself be harmful to the character of the countryside, along with the activity it would generate.

- 5.21 The use of 179 holiday lodges for holiday purposes would give rise to a high level of associated activity, equivalent to some villages in terms of the numbers of occupiers, which would be unusual in agricultural surroundings. Despite the relatively good screening noted above, this would result in the development being apparent in the rural surroundings and would significantly alter the character of the countryside. These changes would include outdoor recreational activity and traffic movements, both of which would generate a type and level of noise atypical of the countryside and would contribute to an overall change in the typically quiet and tranquil surroundings, the extent of which is considered to be unacceptably harmful and contrary to Policy DP30. In this respect the proposal would contribute to the further urbanisation of the countryside in this area which is identified as an 'Area of Restraint' in the LDF to protect against the development pressures from the Teesside area. Necessary lighting within the site would also contribute to this effect.
- 5.22 The applicant has advised that the scale of the development arises from the economics of infrastructure costs and cash flows through the development of the scheme, but this cannot justify the harm to the tranquil character of the countryside that would arise from the very large scale of the scheme. No information has been provided whether an alternative location would have lower infrastructure costs, and thereby be viable at a smaller scale.

#### Wildlife and biodiversity

- 5.23 In general terms, the proposed development is intended to take place within existing arable fields, and it is a declared intention to retain existing hedges and trees. The physical development would be set well back from the river. Disruption of natural habitats is thus likely to be relatively slight.
- 5.24 It is likely that there would be a measure of disruption to wildlife arising from general activity, although it can also be noted that the very extensive planting of woodland and hedgerow planting would, in the long term, give enhanced scope for refuge by wildlife, and is likely to enhance biodiversity in the long term.
- 5.25 Yorkshire Wildlife Trust expressed concerns about some lack of survey evidence and detail in some areas of the biodiversity report submitted and the Trust's further response to additional survey details is awaited.

#### Residential amenity

- 5.26 The nearest residential properties are well over 100m away from the boundary of the application site, and views of the site would be from upper windows, and relatively distant. The extent of harm to amenities of residents would therefore be minor. The proposal does not include a significant centre for entertainment or leisure purposes and it is likely the largest potential for disturbance would be outdoor socialising, children playing and general activity levels within and around the site. It is normal for caravan sites to impose regulation on noise within the site for the benefit of holidaymakers but it would be impractical for the planning authority to monitor and enforce such controls for the benefit of the general population. However, in view of the separation distance from the nearest dwellings, the likelihood of noise disturbance is limited.
- 5.27 The public right of way path eastward from the site runs along the south boundary of The Grange. There is solid timber fencing and planting on the boundary. Use of the footpath is not likely to be extensive in unsocial hours, although it is not possible for the Council to regulate use of public footpaths.
- 5.28 In terms of the amenity of visitors, and possible concerns arising from the nearby sewage works, there is no history of complaints arising from the sewage works, and taking into account that visits will be for relatively short periods, the possibility of

occasional smell issues would not preclude approval, if the scheme were found to be otherwise acceptable.

### Design

- 5.28 The proposed buildings are single storey, and the design details are restrained in character. The details include full height windows and timber cladding exterior and the overall effect is appropriate for the purpose, and the rural surroundings. The design of the hub area makes provision for associated parking. The proposed building would be located within the main body of the site and subject to appropriate materials, which could be ensured by condition, would not be significantly harmful to the rural surroundings.

### Highway safety

- 5.29 The final advice of the Highway Authority is awaited. In the interim satisfaction has been expressed with the main junction from the A172, and the Highway Authority is satisfied there are no capacity issues at the junction onto the A173.
- 5.30 The transport note provided aims to encourage pedestrians to use the existing Public Right of Way from the site to Yarm Lane, and other measures to protect pedestrian safety. Discussions between the applicant and the Highway Authority continue and any further advice will be reported to the meeting.

## **6.0 RECOMMENDATION**

- 6.1 That subject to any outstanding consultations the application is **REFUSED** for the following reasons:
1. Due to its scale and extent, the number of users and associated activity, the proposed development would be an inappropriate form of tourism development and would result in an unacceptable level of harm to the existing tranquil agricultural character of the surroundings, and would contribute to the further urbanisation of the countryside in an 'Area of restraint'. The proposal would therefore be contrary to Local Development Framework Spatial Principle 2 and policies CP4, CP15, CP16, DP30, and NPPF paragraph 28 and would not therefore be a justified exception to the policy principles of Local Development Framework Policies CP1 and CP2.
  2. The development would result in the loss of Best and Most Versatile agricultural land and would have a detrimental effect on this natural asset and would not be a sustainable form of tourism development, contrary to Local Development Framework Policies CP1 and CP16 and NPPF paragraphs 109 and 112.