

From: Thorfinn Caithness [TC@edwardsonassociates.com]

Sent: 16 October 2019 15:17

To: programmeofficer

Cc: Paul Fellows

Subject: RE: North York Moors National Park Local Plan Examination - Register to Participate in the Oral Sessions

Dear Liz

Thank you for your email dated 6 September 2019 in connection with the Examination in Public into the North York Moors National Park Local Plan.

I am responding on behalf of Edwardson Associates Ltd. We have made a number of representations in relation to the soundness of the Local Plan. I therefore write to confirm that we wish to register to speak at the oral hearing session in relation to a number of matters.

Please can you register **Thorfinn Caithness** and **Gemma Edwardson** of **Edwardson Associates** to participate in the oral sessions in relation to the Matters/Policies/Session Dates listed below.

We have attached our previous representations from the May 2019 consultation in relation to each of these matters, however you will see below that under each matter we have made a number of responses to the Inspector's specific questions.

1. Tuesday 12 November 2019 – Matter 2 – Policy CO12 – Conversion of Existing Buildings in Open Countryside.

- In response to the Inspector's question 2.29 Criterion 7 is not justified and positively prepared. There is no rationale for excluding standalone buildings. We consider that standalone buildings are perfectly suitable for conversion.
- In response to the Inspector's question 2.30 Criterion b is not justified and positively prepared. There is no rationale for requiring the presence of an existing residential use in order to support residential conversion of a building in the open countryside.

2. Tuesday 12 November 2019 – Matter 3 – Strategic Policy B The Spatial Strategy – Criteria 1 – Re-Use of Buildings in Open Countryside – Local Needs

- In response to the Inspector's question 3.6, Criterion 1 of Strategic Policy B is not justified and consistent with national policy and guidance. We consider that the local needs criteria should not be applied to residential conversions of buildings of architectural and historic interest. In order to ensure the survival of these valuable heritage assets, they should be available on the open market and thus free from occupancy restrictions.

3. Wednesday 13 November 2019 – Matter 6 – Strategic Policy J – Sustainable Tourism and Recreational Development.

- In response to the Inspector's question 6.3, Criteria b will only be consistent with Policy UE 1 if the Authority's proposed change in the text to include the words "or complies with Policy UE1" is retained.

- We continue to object to paragraph 5.6 of the supporting text to Strategic Policy J. There is no justification for limiting holiday stays to a maximum of 28 days in one calendar year.

4. Wednesday 13 November 2019 – Matter 6 – Policy UE1 – Small Scale Tourism Accommodation.

- We maintain our objection to a ‘Small Scale Tourism’ policy which sets out a clear presumption against proposals for new static caravans or the conversion of existing camping and caravanning sites to statics. This approach is not consistent with the NPPF.

5. Wednesday 13 November 2019 – Matter 6 – Policy UE2 – Development of Existing Tourism and Recreational Businesses

- In response to the Inspector’s question 6.15, we agree that the plan does not deal with applications for new tourism and recreational businesses. The requirement under Policy UE2 for proposals to form part of an existing tourism or recreation business is not consistent with Paragraph 83 of the NPPF, which simply supports sustainable rural tourism. The NPPF does not say that sustainable rural tourism can only relate to existing businesses. The Authority is clearly setting out a presumption against new tourism businesses. We do not accept that this is a sound approach.

6. Wednesday 13 November 2019 – Matter 6 – Policy UE4 – New Holiday Accommodation within Residential Curtilages

- In response to the Inspector’s question 6.21, we do not consider that it is justified to require new holiday accommodation within residential curtilages to make use of an existing building. This policy would currently prevent otherwise acceptable holiday accommodation proposals from coming forward (such as serviced pods, glamping, shepherd’s huts etc) in properties with large curtilages. There is no reason why this policy cannot be adjusted slightly to take account of such circumstances, contexts and scenarios.

7. Wednesday 13 November 2019 and Thursday 14 November 2019 – Matter 7 – Policy BL1 – Employment and Training Development

- We maintain our objections to this policy on the basis that new small scale employment and training development in the open countryside must be linked to an existing business and can only use buildings of architectural or historic importance. This policy is supposed to be about small scale business. What happens if you are a small scale new business? What happens if you are a small scale new business and you want to use a building which is not of architectural importance? Under this policy, as a new business your application would be refused. We don’t accept that this reflects the objectives of Section 6 of the NPPF – Building a strong, competitive economy and supporting a prosperous rural economy – but not if you are a small new business.

8. Wednesday 13 November 2019 and Thursday 14 November 2019 – Matter 7 – Policy BL3 – Rural Diversification

- We maintain our objections to this policy on the basis that rural diversification can only take place using buildings of architectural or historic importance. Based on our own experience there will be cases where existing agricultural, forestry and other land based businesses will seek reasonable diversification using a variety of building types, including more modern portal

framed buildings. We are not talking about huge intensive livestock or other very large modern agricultural buildings here, but rather smaller general purpose agricultural sheds. These can quite reasonably be adapted for a variety of small scale, low key and low intensity uses – small storage buildings, offices etc. Paragraph 83 talks about the planning system supporting the rural economy through conversion of “existing buildings”. It doesn’t restrict or prescribe what these buildings should be. A policy is needed which reflects this and which allows the local planning authority to exercise reasonable judgement based on site specific characteristics and the individual merits of each case.

I would be very grateful if you would confirm receipt of this email.

Regards

Thorfinn

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