

Nicola Dinsdale [via email]

Planning Team

Yorkshire Dales National Park Authority

21st February 2025

Objection to Outline Planning Application: Full planning permission for creation of 'Into the Wilds' visitor attraction and wild animal reserve (part retrospective).

Dear Ms Dinsdale

Friends of the Dales wishes to strongly object to this application.

We have rarely encountered a planning application that is so contrary to the unique landscape and special qualities of Yorkshire Dales National Park, as well as northern England generally. This proposal for major new visitor infrastructure to house non-native species is extraordinary, especially given the UK overall is one of the most nature depleted regions of the world with many native species in serious decline. That is not the purpose of how this planning application is to be decided on, however we argue that it is very material given the purposes of the Yorkshire Dales National Park Authority (the Authority) and its latest stated priorities in its forthcoming Management Plan for 2025-2030.

In responding we draw on and refer to issues raised and comments from organisations with greater expertise such as Friends of the Lake District and others with expertise in exotic animals and zoos. Our main concerns informing our strong objection are as follows:

- The planning history and how the applicant has stretched the basis of the conditions for previously approved planning applications.
- The expert advice about the implications of housing such exotic non-native species in the Yorkshire Dales.
- The assessment of the proposals against the purposes, plans and policies of the Yorkshire Dales National Park Authority.
- Specific aspects of the proposal.

Planning history and the current proposal

In November 2023, only 13 months prior to this new application, the Authority approved the applicant's proposal for change of use of some buildings linked to the existing housing of the animals with clear conditions about the site not being developed as a visitor attraction. Yet the applicant is now seeking to do exactly that, effectively proposing a zoo.

The applicant states in the documents that:

“ the VMP has been prepared by the Applicant ‘New Root’s Holding Company Ltd’ and establishes the strategic vision for the operation and management of the ‘Into the Wilds: Cumbria’ experience which is founded on a desire to conserve and promote the special qualities of the Yorkshire Dales



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National Park (YDNP) through a unique, intimate visitor experience which aims to create an understanding of, and promote, the conservation and biodiversity of both wild animals and the natural beauty and rich wildlife of the Yorkshire Dales National Park."

In practice the proposal is doing the opposite by introducing non-native species. Expert organisations assert that the keeping of wild non-native species and the construction of enclosures to house them does not comply with such vision and risks detracting from the special qualities of the National Park. Furthermore, there are other claims that the presence of such animals is likely to increase risks of pollution, on human safety and disease including to the animals themselves. The legal requirement for the appropriate licensing of zoos was a condition in the 2023 approval and whilst we understand it is not for the planning authority to judge on the suitability of the applicant to house exotic species the evidence of the applicant's performance and conformity to zoo standards is a serious concern highlighted by zoo inspectors as recently as last year. If the applicant does wish to create an *ex situ* facility this is contrary to best practice guidelines issued by both government and the zoo community.

Impact on the Yorkshire Dales National Park

The site is located within Landscape Character Area 3 (LCA3) Howgill Fells in the Yorkshire Dales National Park Landscape Character Assessment categorised as Principal Upland LCA. The Howgill Fells is recognised in the Landscape and Visual Assessment (LVA) as having high susceptibility and, when combined with the LCA, it gives it a high degree of sensitivity to change. The applicants LVA goes on to state that there will be adverse impacts across the following which is of great concern given what they are:

- Landscape character
- Visual receptors
- Key routes
- Specific viewpoints (including from the Lake District National Park)
- Landscape designations

The draft Yorkshire Dales National Park Management Plan 2025-2030t states that:

"The Authority will permit new visitor infrastructure that will directly help visitors to understand and enjoy the special qualities of the National Park subject to conformity with other Local Plan policies."

The applicant also notes that *"The unique landscape of the YDNP is created by a combination of many elements which make up the Special Qualities of the Yorkshire Dales National Park and should be given due consideration in proposal for new developments. These are: Ancient dry-stone walls and field barns, Waterfalls, Yorkshire Three Peaks, Cycling, Flower rich upland hay meadows and pastures, Limestone scenery, Caving, Dark Sky, Moorland, Livestock Farming."*

The applicants' proposals for keeping wild non-native species and the construction of enclosures to house them do not comply with either of these statements, and risk detracting from the special qualities of the National Park. There is no mention by the applicant of how they plan to retain tranquillity, sense of remoteness, and landscape character nor about conserving and enhancing natural beauty, wildlife, and cultural heritage. The proposed accommodation - Shepherds huts and especially safari lodges will not contribute in any way to the local landscape character and will simply encourage a 'wildlife park' idea amongst visitors.

The applicant mentions 'the importance of conservation and providing visitors with an understanding of the current threats to a selection of wild [non-native to UK] species found at the

site' whilst also seeking to 'support and promote an understanding of the existing native wildlife on site and enhance natural beauty and rich wildlife found in YDNPA'. However, there is no detail as to how nor any recognition of the implicit contradiction of promoting the cause of non-native species whilst having an adverse impact on the surroundings and where native species are in decline.

The absence of any representation of the proposed structures such as photomontages makes it impossible to properly assess the landscape and visual impacts, noting structures already in place for which retrospective permission is being sought.

Visitor Numbers and impact on highways and local area

Again, the conditions included in the approval of the previous application reflected concerns by Westmorland & Furness Council Highways Department about the site becoming a public visitor attraction. However, this new proposal includes fifty-five parking spaces to serve only five additional guest houses and cabins, indicating a sizable number of daily visitors whose only access must be via private vehicle, impacting greatly on the traffic in the local area. This significant increase in vehicle movements in such a tranquil and sensitive area is detrimental, including the safety levels for users of the PROW.

The Head of Visitor Services also raises some fundamental points about the implied tourist attraction, mentioning the need in effect for more facilities for greater numbers of tourists but expressing concerns about the lack of an economic impact assessment. We agree with the latter point but question the appropriateness of the first point given the Authority's purpose and policies.

Additional Concerns

Several additional issues raised in other responses are also concerning, such as insufficient detail on proposed landscaping with trees, lighting, and water quality. Combined with the significant issues set out above, these concerns lead us to conclude that the application should be refused in accordance with Local Plan Policy, the Sandford Principle, and Protected Landscapes Duty.

Conclusion

We respectfully request that the Authority refuse this planning application due to the significant adverse impacts on the landscape, ecology, and special qualities of the Yorkshire Dales National Park.

Yours sincerely
Chair, Policy and Planning Committee
On behalf of Friends of the Dales

Friends of the Dales is a working name of the Yorkshire Dales Society which was founded in 1981 and is a registered charity and company limited by guarantee. Friends of the Dales is free of political and financial affiliations. We work to ensure that the Government, the Yorkshire Dales National Park Authority, and other relevant agencies deliver their obligations to care for the special qualities of the Yorkshire Dales, an internationally important area. We do this by considering major planning applications and policy development affecting the Yorkshire Dales and adjacent areas. We offer a year-round programme of walks and talks so that everyone can enjoy and learn more about this beautiful area and why it needs protection. We have a membership of around 1,300 individuals, families, businesses and organisations.