

Officers Report

Planning Application No: 144201

PROPOSAL: Planning application for change of use to caravan site with associated infrastructure and landscaping, including formation of new access.

LOCATION: Land to the rear of Belmont Legsby Road Market Rasen LN8 3DZ

WARD: Market Rasen

WARD MEMBER(S): Cllr. S Bunney, Cllr Mrs C McCartney, Cllr J McNeill

APPLICANT NAME: Green Park Homes

TARGET DECISION DATE: EoT to 30/05/2022

DEVELOPMENT TYPE: Major - Other

CASE OFFICER: George Backovic

RECOMMENDED DECISION: Grant conditional permission

This application has been referred to the planning committee as the recommendation to grant planning permission is in conflict with representations made by Market Rasen Town Council and other third parties, who object to the development on various planning matters relevant to the proposed development.

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The site currently comprises an area of land approximately 3.9 Hectares used for agricultural purposes and paddocks, bordering and used in connection with a residential property (Belmont) along Legsby Road in Market Rasen. The site is bordered to the north and west by the Market Rasen Racecourse, and its associated caravan site; to the south by Legsby Road and agricultural land; and to the east by the Lindsey Trail caravan site and beyond, by a golf course (Market Rasen Golf Club).

A change of use to a caravan site is proposed and an indicative masterplan has been submitted showing 79 units on the site. A new access is proposed at the eastern end of the site onto Legsby Road.

Relevant history:

Central Section of Site: 137053 - Outline planning application for residential development all matters reserved. Refused 22.01.18.

138375 - Outline planning application to erect 1 dwelling all matters reserved. Refused 07.11.18.

1. The application site is not an appropriate location for market housing development and is in an unsustainable location where residents will have to rely on the use of the car to access retail, employment, medical, educational and other services and facilities. The site falls within the open countryside and

there is no evidence or justification that the dwelling is essential to the effective operation of rural operations. The proposed development is therefore contrary to local policies LP1, LP2 and LP55 of the Central Lincolnshire Local Plan and the provisions of the National Planning Policy Framework, particularly paragraph 79.

Appeal submitted and dismissed. Ref APP/N2535/W

“7. The appellant has identified that the site is a 20 minute walk from schools, a supermarket, shops, Festival Hall, leisure centre, doctors surgery and dentist. However, I am not convinced that access to the facilities would be via a desirable route for families with young children, older people and those with mobility issues. This is because of the unlit, high speed nature of the road and the absence of a footpath along part of the route, even if the grass verge that exists is well maintained.

8. The appellant has identified alternative walking routes into Market Rasen. Although they would be traffic free, from my observations on my site visit they would not address the other concerns identified. The occupants of the dwelling in all likelihood would be reliant on the car to access services and facilities to meet day to day needs. I do not therefore consider the proposal would support the provisions of paragraph 103 of the NPPF which states that planning should actively manage patterns of growth to support the use of public transport and walking.”

Land to the west:

W61/451/75 - Application to site 60 touring caravans. GC 11/09/75.

Land to the east:

133092- Change of use of land to form touring caravan site and paddocks with 24 pitches and amenity building, to include sanitary facilities and shop-resubmission of 132232. GC 10/08/15.

Representations:

Chairman/Ward member(s):

Market Rasen Town Council: Object

Market Rasen Town Council (MRTC) considered the proposal at the Planning and Development Committee on the 9th of March 2022. MRTC feels that there are many issues related to this proposal that need to be fully scrutinised, hence MRTC have made the decision to request that this application is “called in” to be considered by the West Lindsey District Council Planning Committee. MRTC’s concerns fall into the following categories, Precedent, Ecology, Environment, Biodiversity, Traffic – Roads, Landscape and Views and Sustainable Development, as detailed below with references to the Central Lincolnshire Local Plan (LP)

Precedent: In 2018 planning permission was refused twice for permanent dwelling on this site. Applications 137053 and 138375. The applicant unsuccessfully appealed against the decision on application 138375. It was decreed that the site is inappropriate for development as it falls within open countryside and that it is an unsustainable location as residents will have to rely on the use of the car to access retail and services etc. It was

seen to be contrary to LP1, LP2 and LP55. Since 2018 nothing has changed regarding developments in the area. LP55 paragraph C clearly states that mobile homes are to be treated the same as permanent homes – therefore the precedent for the permanent homes applies to this static home development.

Ecology, Environment, Biodiversity: There is a rich diversity of wildlife in the area including various species of owls and small mammals. The static Caravans and lodges will inevitably reduce the available habitat and subsequently have a negative effect on the wildlife.

The increased light, noise and air pollution from the site will have a negative effect on the natural habitat. The site is within 300m of Linwood Warren – a designated Site of Specific Scientific Interest [SSSI]. The proposed increased numbers of visitors and temporary residents in the area will increase the risk of damage to this area and its unique habitat. It is clear then that the development goes against LP21.

Traffic – Roads: The site is located on the B1202, Legsby Road. It runs from the junction on Willingham Road [A631] out of town past De Aston School, the local cemeteries to the racecourse. This section is largely residential on both sides and is pavement. It is reasonably narrow and struggles to take the traffic that uses it – especially the HGVs. Beyond the racecourse towards Legsby Village the road becomes even narrower. There are more bends and no pavement. For a fair distance the road runs through high hedges and woodland that make it very dark – adding to its risk – especially at night-time. The system cannot safely absorb the extra vehicles and pedestrians which will be produced by the proposed development

The proposed development is 1.8km from the centre of Market Rasen as the crow flies. This inevitably means that a large proportion of the development's occupants will use their cars to go shopping, visiting local amenities etc. The road system cannot manage these. The development does not meet the requirements of LP13.

Landscape and Views: As a significant area of open meadow cum grazing land the proposed development is clearly an open space of land in a rural area. The open areas of the racecourse and golf club along with the local woods and Linwood Warren add to the rurality of the area. The adjacent touring caravan site is limited in its numbers and is consequently well, spaced out. The bungalows and house on Legsby Road into Market Rasen are set in spacious gardens all adding to the low-density countryside type environment. The development with its 80 dwellings [79 holiday/second homes and 1 for The Manager] along with 169 parking spaces and the associated buildings will come across as a densely packed community that is far from open or rural. It will therefore have a negative impact on the landscape and therefore does not meet LP17.

The local plan in LP1, LP7, LP55 requires commercial development to be economically beneficial and sustainable to the local economy. Currently, the

two touring caravan sites in the area run for limited periods of the year [Racecourse 8 months, Lindsey Trail 7 months] – they are also required to adopt restrictions on the light and noise from the site [curfews at 10.30pm]- it would be accepted that the new development would be expected to adopt the same. The inevitable high density produced by the 80 caravans, 169 parking spaces and associated buildings will make such restrictions difficult to enforce.

The developers say that the project will create the equivalent of four full time jobs. However, as the site will be closed for some months of the year these jobs will be seasonal and so have a lower impact on the economy than that at first might be assumed. The developers in their submission place great emphasis on the racecourse being a major source of their business. Race meetings are sporadic throughout the year – many of which will be in the closed period - so whilst during permissible meetings the customer basis will be higher in between time it will fall away. This means the benefits to local traders will be sporadic, which does not meet the sustainable criteria.

In recent years planning permission for several static holiday homes and lodges have been granted for the land around Sunny Side Up on the outskirts of Market Rasen – on the Tealby Road B1203. As yet only one of these has been constructed and even though the economy is moving into a post Covid 19 stage there is little sign of the development continuing. Again, suggesting that there are concerns around the economic sustainability of such projects in this area.

Local residents:

Lindsey Trail Touring Park Object:

The Lindsey Trail Touring Site is situated on land that initially belonged to the Golf Course, this land was kept by the golf course as very well-kept greens, neatly trimmed and trees kept tidy. The land when given to the Race View property became pastureland. When the Lindsey Trail Touring Park received planning permission for the site, the land went back to being used for recreational purposes. The site which measures approximately 110m x 38m and has only 24 touring pitches, the owners of the site has given back more land than this to nature and wildlife, this was part of the requirements of the planning permission. The owners have planted over 800 trees and hedging and have put up 17 nest boxes for small birds and 2 owl boxes in conjunction with the Environment agency. The grass on the touring park is left as long as possible in the dandelion season and left to seed, this attracts many seed eating song birds. Where the touring park toilet block is situated, this used to be a deep litter poultry house, so there has been a building on this area for more than 60 years. This toilet block had to be built to resemble stables and stained black to fit in with the rural countryside area. The touring park is only open 7 months of the year, and no flood lighting was permitted.

The Lindsey Trail Touring Park is an adult only site, who come to the site for a quiet, peaceful and restful stay, where they can see/hear the birds and wildlife and where there is no light pollution or noise. There is a strict light pollution policy (no floodlights on site, campfires or disco lights) and curfew on excessive noise by 10.30pm to 8.30am. Plus no group bookings allowed. This is twofold – 1. Not to disturb native wildlife that has resided prior to the campsite and not to 2. The residential property and the golf course which is

160m away. This application goes against the ethos of the Lindsey Trail Touring Park, respecting both neighbours and nature.

The Touring site is limited to open 7 months of the year, the Racecourse camp site opens for 8 months of the year so this is different to the proposed application which wishes to open for 12 months of the year, with potential residents on the development for the whole year.

The amount of extra traffic on the road ways is an issue and concern for potential horse riders/carriage drivers and cyclists who come to the Touring Park to access the local Lindsey Trail and quieter country roads

The Lindsey Trail Touring Site of 24 pitches is around 140 metres from the golf course car park, so this would make the nearest neighbours the Steward of the Golf Course which is approximately 160 metres from the nearest caravan to them, and there is also a policy on site no noise after 10.30pm to 8.30am. The caravans on the Lindsey Trail Touring Park are also 110 metres from the residential property. The proposed application is only approximately 30 meters from the residential property, the reception and holiday caravans and lodges will be therefore very close to our property. We fully appreciate that residents on holiday will want to enjoy themselves and therefore the noise level will be an issue. Therefore, we have major concerns that the buffer zone is no way sufficiently big enough next to residential properties, there is no proposed suitable fencing/green screen to limit noise and view.

Race View, Legsby Road: **Object** (Summary).

Size of the proposed development; closeness to a residential property; Noise level; Traffic on the road - causing more difficulties on Race Days; Floodlighting: The effect on the environment; Views/landscaping; Over saturation of the market.

Dog Kennel Lodge, Legsby Road: **Object.**

Legsby Road, mentioned as the leisure mile, already has the Racecourse which has been known to close the road on some race days, preventing a route to my home and race marshals stopping through traffic. There's already a campsite at the racecourse and a new one adjacent to the golf club further down for tourers. Legsby Road is entirely unsuitable for the amount of traffic already generated which has to negotiate walkers, cyclists, horse riders and dog walkers. Static caravans and lodges in the numbers envisaged would require the widening of the highway and an extension to the public footpath for the whole of its length in order to allow for safe, increased holiday footfall and vehicular access.

Dog Kennel Farm, Legsby Road: **Object.**

This development is in the quiet open countryside, the road approaching it from Market Rasen is a narrow, one lane in each direction & cannot be widened at the Rasen end due to the Bungalows & their gardens. It then runs past the racecourse before reaching Belmont. This narrow road is already quite busy & frequently closed to through traffic on race days. There is then a long stretch through meadows before continuing past the forest & an SSSI before a very abrupt right bend. The traffic associated with this proposed site

would make the road unusable by walkers, cyclists & horse riders. With 79 vans, some accommodating 11 people, that would be two or even three cars/van making trips in & out of Market Rasen, making the road far too busy for vulnerable road users. Also given these numbers what infrastructure will be in place for the considerable sewage output? In addition street lighting on site, is proposed. This would light up a dark area of meadow, forest & woodland, ruining the habitat of many birds & wild creatures. Furthermore, no signage regarding the intention to develop this land has been displayed at all. People passing by do not know what a major change could be imminent.

Woodhill Farm, Legsby Road **Object.**

The proposal is for 80 caravans which in itself is excessive for the site. 165 car parking spaces. Legsby Road is not able to support this input of additional traffic without the road being widened, a footpath from the Racecourse to the Golf Course being instated and the 30mph speed limit to extend to the Golf Course. The road is sometimes closed during race meetings which would also affect the site. The road is not in a good state of repair at present and I worry that articulated Lorries and the additional vehicle usage can only make it worse. The planning application does not say if the caravans are to be occupied for twelve months of the year. The smaller touring caravan areas on Legsby Road are only open for seven months of the year. Neither does it say if the caravans themselves have a planning application lifespan. On many sites ten years is the limit for a caravan. It would be very unsightly in time to come if the site was not made to be kept up to standard and could easily become an eyesore for such a beautiful area. The landscaping needs to be kept in keeping with the area hopefully the high hedge and all trees especially in the small wooded area to the side of the entrance to the racecourse will be retained and further trees planted. (Should permission be granted).

The sewage system, water and drainage needs to be seriously looked at as the Anglian Water have had various problems in this area for the locals especially on Horse Racing days. Also there are only four recycling areas shown on the site for what could be up to 480 people??

If the planning application had been made for 80 permanent houses it would have been immediately rejected (See various other applications on Legsby Road which have been refused). This I do not understand as if given permission these caravans are no different to permanent homes the infrastructure is just the same. Housing, Lighting (pollution), hard Landscaping (roads etc.), Noise levels. Having pointed out the above concerns my greatest fear is the effect on the countryside. Rural and Natural England are aiming to provide and protect wildlife areas. I note that Natural England have made no comment to the application but are asking yourselves to consult your own ecology services for their advice. (Hopefully this will be done)? Myself as a farmer have great respect for the wildlife and birdlife we are so lucky to have in our area. The lighting, noise and the development of this highly congested site can only be detrimental to our wildlife. I call on you to look very carefully at Planning Application 144201 and hope that a satisfactory and realistic decision may be reached.

Clearwell Legsby Road: **Object:**

The Application form states that there are trees and hedges on the site and that could influence the development and important to local landscape character, the form itself states that if you answer yes to both questions a tree survey should be provided. In this case I would go on to ask for a full arboricultural impact assessment given that the access, footpaths, proposed units etc. all fall within root protection areas of a number of trees on the site. There has been no consideration of this as part of the submission, so how are the council able to assess this aspect. Given the significant scale of the development and the fact the proposed units are not connected to mains drains a Foul Sewerage Assessment should be provided. Further details are therefore required given this application is a supposedly fully detailed scheme.

The site location plan does not truly reflect the site including visibility splays to the front of the site which are required. Legsby Road is not flat along the side of the site, a significant dip is present outside Belmont, so I assume the 160m visibility splay is along the flat part of Legsby Road. (Drawing R-21-0121-002)

The site access shown on the vehicle tracking does not reflect, the proposed entrance and access onto the site this needs clarifying and plans updating. Inaccuracies in width and layout. The proposed entrance does not match the layout of the road within the site. The vehicle tracking does not show ability for vehicle to enter and exit in forward gear, how does an articulated vehicle turn around? The vehicle tracking plan does not show refuse vehicles ability to get around the site to collect refuse given location of refuse collection points. No passing places provided throughout site.

The proposal is for 79 units no waste management plan is provided as part of the application.

The site is set within the open countryside, no proposed landscaping plans have been submitted as part of the proposal. Given the location of the site a detailed landscaping scheme should be submitted to fully understand the impact of the proposal on the surrounding landscape.

The proposal is set within open countryside, there appears to be a significant number of lit elements on the site. No detailed lighting scheme and impact assessment has been provided that could have an impact on biodiversity and the character of the surrounding area.

Within the Preliminary Ecological Appraisal, submitted alongside this application, paragraph 5.3.2 within the Development Constraints and Recommendations chapter advises further survey work is required and states:

'At least one brown long-eared bat was noted to be using the bungalow and field signs of bats were recorded. In accordance of the latest industry guidelines, further assessment is required in order to ascertain the nature and status of the roosts within the bungalow and then use this information to prepare a detailed mitigation strategy for the site. The further survey work required is as follows:

1. January/February 2022 – a hibernation survey of the bungalow

2. May-September 2022 - 3 evening/dawn surveys of the bungalow to be under taken with the use of ultrasonic bat detectors, in order to ascertain the species present, the location and status of the roosts. A team of 3 surveyors will be required in order to cover all elevations of the building. In addition, the site will require appropriate lighting to ensure the site boundaries and woodland areas are not illuminated or are subject to directional, low level lighting only.'

Not only has the additional survey work not been submitted as part of this application but that survey work is required to be carried out between May and September. Which surpasses the 8 week determination date for some time. The application therefore should be withdrawn until such a time that these reports can be carried out.

Whilst the application proposes a caravan park, the only details of the proposed units are plan views sizes. Details of the proposed units need to be provided, together with detail of the reception unit, to fully understand the size scale and impact on the surrounding area. I am also confused on the usage of the properties, Clause 4.2.1 of the transport policy states units are for holiday let purposes only, but elsewhere units as a mixture of residential and holiday lets.

In addition to the above concerns about the application material in general, as part of the application submission, the application has failed to acknowledge and take into consideration the impact of a number of caravans in close proximity to the property known as Belmont and the impact this has on neighbouring living conditions of present and future occupiers of the property. To my surprise, the planning statement and supporting application makes little reference to the impact the proposal has on neighbouring living conditions; this is deeply concerning given the impact the proposal will have on this property and private amenity area. What is more concerning is the lack of information submitted with the application to enable full assessment of this issue as part of the planning assessment of the proposal.

The proposal would result in at least seven units including outdoor amenity areas sitting immediately on the boundary of this property the application shows serious flaws in the design and layout of the site and I have serious concerns with this relationship. In particular, the oppressive noise and potential overlooking of the units to the dwelling and primary amenity areas. No noise impact assessment has been submitted. For these reasons, the development would have an unacceptable impact and cause significant and unfounded harm to the living conditions of Belmont, as a result of noise, Lighting, overlooking and loss of privacy. Through the sites design, layout and impact on neighbouring living conditions, the proposal would not result in a high quality of design that can be supported. In this respect, the proposal would conflict with section 12 of the Framework. In this respect, the proposal would also conflict with the Framework's objective of seeking a good standard of amenity for all existing and future occupants of land and buildings.

The Chase Legsby Road Object:

The road is totally unsuitable for such a large infrastructure. It is a narrow road

and would need widening to support the extra vehicle use, which can't be done.

5 Stable Way Market Rasen: **Object**

Well this is a marmite application! People from outside the locale seem in favour, local people less so and I am amongst these. This is a rural road used by walkers, cyclists etc. to access our countryside, it is dangerous enough being a near single track road. I have read MRTC response and feel that they have more than adequately relayed my views against this application, my only additional comment is how long before the owner/applicant applies for a full 12 months occupation as has happened elsewhere, and what would the response be?

The Conifers Legsby Road: **Support**

These extra facilities for caravans should enhance the area and improve amenities.

Villa Farm Stables Villa Barns Partridge Drive Rothwell: **Support**

Absolutely Brilliant Idea to bring visitors to the area, walking, cycling the races much needed revenue to local shops and business.

Letters of support received from outside West Lindsey:

50 Sandringham Avenue Whiston Rotherham:

The addition of a well-run 79 unit site will bring a number of people into Market Rasen and hopefully support the town centre shops and public houses.

62 Way Lane, Cambridge:

I've have many happy memories visiting Market Rasen but have been saddened by the decline of facilities and closure of shops and businesses in recent years. What was a charming market town with the added attraction of the racecourse has become sparse with thriving attractions. I think the proposed plans could only enhance the area and create opportunities for local people to find employment and hopefully open up more businesses which the enterprise would create. I understand the concern shown by some people but the footpaths I understand will not be affected and wildlife habitat will be retained. We need to expand to enable more places for people to come to Market Rasen and hopefully have the chance to regenerate the town to its former charm.

Gaylin Kiln hill, Ludford:

I think the project would be a big asset to Market Rasen town if the application goes ahead.

55 Edward Seago Place Brooke Norwich:

Market Rasen is a lovely traditional market town set in wonderful scenery but like many similar towns needs to move forward or wane. This proposal will enhance the vision of a new 'industry' of leisure and tourism, bringing support for the Racecourse and the Golf Club and shops and businesses in the town. It will have a strong ecological ethos, tying it in with the nature reserve and Willingham Forest. This can only bring benefits to the whole of the area.

9 Chapel Lane Lincoln:

I wish to support the application for a static caravan park on the edge of Market Rasen. Being a Yellowbelly I have been attending the races at Market Rasen for many decades and I have been saddened by the degeneration of the once vibrant town. The planned ponds will bring birds and be very beneficial to varied wildlife. I think that the proposed static caravan park can only be a huge bonus bringing jobs and business to the lacklustre town.

19 Grove Street Kirton in Lindsey:

I would strongly support this application as i believe it would be a huge asset to the town. It will bring in a boost to tourism which would be beneficial to the businesses in the town. This application would enhance the surrounding areas leisure and tourism offerings and is in an ideal location. This would blend in to the locality and would be a prestigious asset which is strongly needed to give tourists a new choice of local accommodation for people wanting and needing to stay at Market Rasen.

Endymion Tatenhill Lane Rangemore Burton upon Trent:

I have lived in the area for over 30 years before moving to my current address. Market Rasen needs 5* holiday facilities. The town is struggling so increasing visits by tourist will put it on the map. The development will support the local economy and generate more support for the natural and cultural heritage. Visitors to the Race Course and the beautiful Wolds will benefit from 5* second homes or holiday caravans and lodges.

104 Keymer Road Hassocks (Mid Sussex):

Having carefully looked at the planning documents available online, I would like to give this proposal my wholehearted support. I have family connections to Lincolnshire and Grimsby and this fixed caravan site will be a welcome stopping place when visiting. There are already touring caravan sites in the area which my sister has used when visiting and this fixed caravan site will be a good complement. The online documents show thorough background work has been done and I think the proposed site will be an asset to Market Rasen and the surrounding area. The provision of good pedestrian access will also be compatible with cycle access and the location is ideal for exploring on and off road possibilities in Willingham Woods, the Wolds, Market Rasen and the neighbouring towns and villages.

43 Nursery Close Hurstpierpoint (West Sussex):

With multiple family connections to Lincolnshire, particularly to Rasen, we have always been disappointed by the lack of good quality self-catering accommodation suitable for families in the area. This development will provide a very welcome alternative for those visitors who do not wish to camp and who do not have their own caravan or motor home. As a tourist destination, Rasen is well positioned as a base for enjoying the attractions in the area, including the delights of the Wolds and the local Lindsey Trail, part of which we walked on our last visit. This development would also make an ideal base for touring the area by cycle, especially as Rasen sits along National Cycle Route 1. Having looked at the plans for the park, we believe this is a well-considered design that will provide a beautiful holiday destination for visitors. We do take note of the comments regarding traffic on the Legsby Road and, having visited the areas on race days, we know that this can be an issue. However, that is only on race days and the traffic problem is a matter for the race course. For the vast majority of the time, traffic is simply not an issue on this road, in our experience.

Harlands Cottage Balcombe Road Haywards Heath (West Sussex):

Having visited the area in the past, this proposal would be of great interest, including visits to the nearby racecourse. The proposal seems to be well thought through, with some shielding being provided by hedgerows and an interesting possible addition of a footway. Having known friends in this area it would be a place I'd happily stay and the potential boost to the local economy is clear.

Environmental Protection:

If during the course of development, contamination not previously identified is found to be present on the site, then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a method statement detailing how and when the contamination is to be dealt with has been submitted to and approved in writing by the Local Planning Authority. The contamination shall then be dealt with in accordance with the approved details.

Reason: In order to safeguard human health and the water environment as recommended by Environmental Protection in accordance with Policy LP16 of the Central Lincolnshire Local Plan.

LCC Highways:

05.05.2022: No objections and requests the following condition be imposed:

The development hereby permitted shall not be occupied before a footway, to connect the development to the existing footway network, has been provided in accordance with details that shall first have been submitted to, and approved in writing by, the Local Planning Authority. The works shall also include appropriate arrangements for the management of surface water run-off from the highway.

Reason: To ensure the provision of safe and adequate pedestrian access to the permitted development, without increasing flood risk to the highway and adjacent land and property.

There is no precise definition of "severe" with regards to NPPF Paragraph 111, which advises that "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe." Planning Inspector's decisions regarding severity are specific to the locations of each proposal, but have common considerations:

- The highway network is over-capacity, usually for period extending beyond the peak hours
- The level of provision of alternative transport modes
- Whether the level of queuing on the network causes safety issues.

In view of these criteria, the Highways and Lead Local Flood Authority does not consider that this proposal would result in a severe impact with regard to NPPF.

As Lead Local Flood Authority, Lincolnshire County Council is required to provide a statutory planning consultation response with regard to drainage on all major applications. This application has submitted a suitable drainage strategy and therefore the Lead Local Flood Authority does not consider that this proposal would increase flood risk in the immediate vicinity of the site.

30.03.2022: No objection in principle, the access arrangements are acceptable. A footway link connecting the development site to the existing footway infrastructure on Legsby Road will be required, to provide safe access for pedestrians to and from the site. It is recommended that a suitable width link is provided along the western side of Belmont and along the public highway from that point. Can the applicant submit details for consideration.

The submitted drainage strategy is acceptable in principle.

Natural England: (Summary) No comments to make on this application. The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment.

Tree and Landscape Officer:

There is indicative planting shown on the Master Plan but there are no details regarding species, sizes, quantities etc. There is an existing good quality dense hedgerow along the southerly site boundary alongside the highway, with trees and hedge also along the easterly boundary, and a bund and trees along the westerly boundary. The northerly boundary has various trees but no low-level screening such as a hedgerow, so there would be clear views between caravan site and the land just to the north. Details on species and their position, sizes, quantities etc.... should be required as part of a scheme of landscaping. The landscaping shown on the Master Plan would add various scattered trees behind the frontage hedgerow and would help screen the intended caravans. It is just plots 69 and 70 where there would be no planting between the caravans and the front boundary hedge. The proposed positions for the rest of the landscaping is appropriate. It would be preferable for a mixed native hedgerow along the northerly boundary to be included in a scheme of landscaping.

LCC Historic Services: No archaeological impact

Environment Agency:

We object to the proposed development as submitted because it involves the use of a non-mains foul drainage system in circumstances where it may be reasonable for the development to be connected to a public sewer but no justification has been provided for the use of a non-mains system. We recommend that the application should be refused on this basis.

This objection is supported by planning practice guidance on non-mains drainage which advises that the first presumption must be to provide a system of foul drainage discharging into a public sewer (ref ID 34-020-20140306). Only where, having taken into account the cost and/or practicability, it can be shown to the satisfaction of the local planning authority that connection to a public sewer is not feasible, should non-mains foul sewage disposal solutions be considered.

Relevant Planning Policies:

Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. Here, the Development Plan comprises the provisions of the Central Lincolnshire Local Plan (adopted in April 2017); and the Lincolnshire Minerals and Waste Local Plan (adopted June 2016).

Development Plan

- ***Central Lincolnshire Local Plan 2012-2036 (CLLP)***

Relevant policies of the CLLP include:

LP1: A Presumption in Favour of Sustainable Development

LP2: The Spatial Strategy and Settlement Hierarchy

LP3: Level and Distribution of Growth

LP7: A Sustainable Visitor Economy

LP13: Accessibility and Transport

LP 14: Managing Water Resources and Flood Risk

LP17: Landscape, Townscape and Views

LP21: Biodiversity and Geodiversity

LP26: Design and Amenity

LP55: Development in the Countryside.

- ***Lincolnshire Minerals and Waste Local Plan (LMWLP)***

The site is not within a Minerals Safeguarding Area, Minerals or Waste site / area.

National policy & guidance (Material Consideration)

- ***National Planning Policy Framework (NPPF)***

The NPPF sets out the Government's planning policies for England and how these should be applied. It is a material consideration in planning decisions. The most recent iteration of the NPPF was published in July 2021. Paragraph 219 states:

"Existing [development plan] policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of

consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given)."

- **National Planning Practice Guidance**
- **National Design Guide (2019)**
- **National Design Model Code (2021)**

Draft Local Plan / Neighbourhood Plan (Material Consideration)

NPPF paragraph 48 states that Local planning authorities may give weight to relevant policies in emerging plans according to:

- (a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);*
- (b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
- (c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).*

- **Consultation Draft Central Lincolnshire Local Plan Review June 2021 (DCLLPR)**

Review of the Central Lincolnshire Local Plan commenced in 2019. The 1st Consultation Draft (Reg18) of the Local Plan was published in June 2021, and was subject to public consultation. Following a review of the public response, the Proposed Submission (Reg19) draft of the Local Plan has been published (16th March) - and this is now subject to a further round of public consultation (expired on 9th May 2022).

The Draft Plan may be a material consideration, where its policies are relevant. Applying paragraph 48 of the NPPF (above), the decision maker may give some weight to the Reg19 Plan (as the 2nd draft) where its policies are relevant, but this is still limited whilst consultation is taking place and the extent to which there may still be unresolved objections is currently unknown.

Relevant Policies:

- S1 The Spatial Strategy and Settlement Hierarchy
- S2 Growth Levels and Distribution
- S4 Housing Development in or Adjacent to Villages
- S6 Reducing Energy Consumption – Residential Development
- S19 Resilient and Adaptable Design
- S20 Flood Risk and Water Resources
- S22 Meeting Accommodation Needs
- S46 Accessibility and Transport
- S48 Parking Provision
- S52 Design and Amenity
- S56 The Historic Environment

Main issues

- Principle
- Highway Safety
- Landscape and Visual Impact
- Biodiversity
- Noise and Disturbance
- Foul Drainage

Assessment:

CLLP policies LP2, LP7, LP13 and LP55

The site is located outside any defined settlement and falls to be considered as “countryside” under the spatial strategy and settlement hierarchy of LP 2:

“Unless allowed by:

*a. policy in any of the levels 1-7 above; or
b. any other policy in the Local Plan (such as LP4, LP5, LP7 and LP57),
development will be regarded as being in the countryside and as such
restricted to:*

- *that which is demonstrably essential to the effective operation of agriculture, horticulture, forestry, outdoor recreation, transport or utility services;*
- *renewable energy generation;*
- *proposals falling under policy LP55; and*
- *to minerals or waste development in accordance with separate Minerals and Waste Local Development Documents.*

This allows the application to be assessed against LP 7 in order to determine whether the principle is acceptable.

There is no support available under LP 55 as “applications for temporary and mobile homes will be considered in the same way as applications for permanent dwellings”. Part D deals with applications for new dwellings which are “only acceptable where they are essential to the effective operation of rural operations listed in policy LP2”. However, in this instance, the development is primarily for lodge holiday accommodation.

Part E does set out its policy for “non-residential development in the countryside” as follows:

Proposals for non-residential developments will be supported provided that:

- a. The rural location of the enterprise is justifiable to maintain or enhance the rural economy
or the location is justified by means of proximity to existing established businesses or natural features;*
- b. The location of the enterprise is suitable in terms of accessibility;*
- c. The location of the enterprise would not result in conflict with neighbouring uses; and*

d. The development is of a size and scale commensurate with the proposed use and with the rural character of the location.

It is considered however, that this policy should not be read in isolation, but alongside LP7 which sets out a direct policy in relation to “A Sustainable Visitor Economy” and which provides locational parameters for such developments.

The supporting text (section 3.7) of the Central Lincolnshire Local Plan (CLLP) explains that *“The visitor economy is one of the most important sectors of Central Lincolnshire’s economy.”* It explains that, whilst Lincoln is the principal visitor destination in Central Lincolnshire, that *“Rural Central Lincolnshire also makes a significant contribution to the visitor economy, with many visitors attracted to the waterways, walking and cycling routes, aviation attractions and other attractions across the area which are varied and numerous.”*

The Greater Lincolnshire Local Enterprise Partnership (GLLEP) recognises the visitor economy as one of the top three strongest economic sectors within Greater Lincolnshire and identified this sector as one of the priorities for growth. In order to achieve this, policy LP7 *“aims to encourage sustainable growth in the visitor economy”*. It explains that *“The tourism offer of more urban areas is different to that in rural areas where the scale and types of visitor economy uses need to be in scale with their surroundings.”*

Policy LP7 which supports “sustainable rural tourism and leisure” is in accordance with paragraph 84 of the NPPF which refers to sustainable rural tourism and leisure developments and is afforded full weight.

Policy LP7: A Sustainable Visitor Economy

Development and activities that will deliver high quality sustainable visitor facilities such as culture and leisure facilities, sporting attractions and accommodation, including proposals for temporary permission in support of the promotion of events and festivals, will be supported. Such development and activities should be designed so that they:

- a. contribute to the local economy; and
- b. benefit both local communities and visitors; and
- c. respect the intrinsic natural and built environmental qualities of the area; and
- d. are appropriate for the character of the local environment in scale and nature.

Development should be located within existing settlements, or as part of planned urban extensions, unless it can be demonstrated that:

- such locations are unsuitable for the nature of the proposal and there is an overriding benefit to the local economy and/or community and/or environment for locating away from such built up areas; or
- it relates to an existing visitor facility which is seeking redevelopment or expansion.

In terms of the second bullet point of LP7 the site would not relate as a matter of fact to an existing visitor facility. Nevertheless, an important material

consideration is its location close to the existing Market Rasen Racecourse Caravan and Touring site to the west and the “Lindsey Trail Touring Park” to the immediate east. Although these were granted permission under different development plans it adds some weight to the view that such proposals are not readily contained within existing settlements. It would be within an area where existing tourism and leisure facilities are already established.

Whilst it is not within an “existing settlement” it is noted that it is on the periphery of one of our two established Market Towns which are a focus for growth and which would directly benefit from the proposal. On balance this is considered a suitable location for the development. Policy further requires that there be an overriding benefit to the local economy and/or community and/or environment.

Overriding benefit to local Economy

The preceding sections of this report make clear the importance of Tourism to the local visitor economy. The policy requires “overriding benefits” to the local economy. The applicants have used the British Holiday and Home Parks Association (BH&HPA) commissioned report prepared by Roger Tym and Partners to determine the economic impact of holiday caravans in 2012. This was produced over 10 years ago and the applicants have used this as the basis of their submission. Page 11 of the Planning Statement submitted is reproduced in part below:

“In this regard, the British Holiday and Home Parks Association (BH&HPA) commissioned Roger Tym & Partners to determine the economic impact of holiday caravans in 2012. The following table sets out the estimated economic benefits of the proposed development (based on the submitted masterplan) extrapolating the data and calculating it according to 2021 values (the latest annual figure) using the Bank of England’s Inflation Calculator. This assumes of course that the rate of contribution to the economic remains the same as it was in 2012. Table 1: Estimated Economic Benefits of the Proposed Holiday Caravan Park at Belmont (in 2021, using official inflation rates)

	Privately Owned Holiday Caravan	Park Letting Fleet
Park Expenditure per Unit	£359,823	£585,643
Visitor Expenditure Per Unit	£387,120	£933,058
Total Spend Per Unit	£746,943	£1,518,701
Total GVA Per Unit Per Annum	£336,497	£684,904

(GVA stands for Gross Value Added)

During the operation of the holiday accommodation, tourists are envisaged to create employment and help to sustain jobs in the local area by visiting local attractions, shops and establishments which are usual activities for visitors to an area. Indeed, the likely overall spend is estimated to range from £746k to £1.518million in any given year, with a GVA boost to the local area of between £336k and £685k.

This is noted and it is also claimed that following completion the site would provide “8 full time equivalent jobs within the site including grounds keepers, receptionists, cleaners and maintenance operatives.”

By way of comparison, an application for 84 holiday lodges (Ref: 138145) set out that 3 full time equivalent jobs would be created. If it is assumed that only 3 full time jobs would be created this is still a benefit of the application although it would be difficult to describe it as an “overriding benefit”.

Overriding benefit to the local community

The argument advanced principally relates to additional custom within Market Rasen supporting the retention of existing services and facilities and a benefit from the provision of a new footpath to users of the Lindsey Trail touring park. This is a benefit of the proposal but would not be considered to be an overriding benefit.

Overriding benefit to the Environment

This is put forward principally on the basis of additional planting in the form of new hedgerows and native trees together with 2 attenuation ponds that would improve the bio diversity value of the site. This would be required by policy LP21 as a result of what is being proposed in any event and cannot be claimed as an overriding benefit.

Concluding Statement

The principle of the proposal on balance is capable of attracting support given its specific location adjacent existing holiday accommodation to both sides of the site. This is subject to assessing the detailed impacts of the proposal which is set out below.

Highway Safety:

A considerable number of objections have been raised on this matter with specific reference to conflicts between different users of the road including walkers, cyclists and horse riders. These objections are noted. The Highways Authority has however, not raised any objections to the proposal subject to the provision of a new footpath which the applicant has accepted. On this basis notwithstanding the objections received there is no reason to withhold consent on the grounds of harm to highway safety. It would be in accordance with LP13.

Landscape and Visual Impact

There are no public rights of way on the site. “Linw/162/1” is on agricultural land to the south at a distance in excess of 300m. Whilst Linw/764/1, is approximately 300m to the southeast. It is noted that there are no statutory landscape designations on the site. To the east beyond the Lindsey Trail Caravan Park is a large Area of Great Landscape Value (AGLV) which includes Willingham Woods.

The legal definition of a caravan was established in the Caravan Sites and Control of Development Act 1960. It was modified in 1968 to include twin-unit mobile homes and again in 2006 when the sizes were increased. This meant

that the overall height (measured internally from the floor at the lowest level to the ceiling at the highest level) could not exceed 3.05m. It is on this basis that the reasonable assumption was made that it would be below 4m in height externally.

A Landscape and Visual Impact Assessment (LVIA) was submitted with the application. Sections of this are reproduced below:

“Summary of Visual Effects Views of the Site are generally constrained by hedgerows, trees and landform. Furthermore, the scale of the proposed development and low height of features (<4m) results in few opportunities to view the proposed development in the context of the existing landscape. Where views are predicted they are at a longer distance, Viewpoint 2 from a Public Right of Way adjacent to Woodhill Farm.”



Viewpoint 5 from Byway Linw/764/1



It will result in a change to the character of the site to one accommodating holiday lodges and associated infrastructure including open recreational space. The existing boundary hedgerows of the site (with the exception of removal of a section for the new access) will be retained as will the wooded copse in the western corner and mature trees to the eastern and northern boundaries. The enclosed nature of the site, limited intervisibility with the surrounding landscape and scale of the development, comprising low height

(<4m) temporary structures will result in few perceivable impacts to the surrounding landscape. There will be a slight intensification of development in the local area, which will not typically be observed beyond the local area around the site.

The conclusion reached is reasonable. Whilst the character of the site will undoubtedly change as a result of the proposal the change this creates is not considered to be one of significant harm. It will be necessary to condition the requirement for a scheme of landscaping incorporating a “mixed native hedgerow along the northerly boundary” as recommended by the Tree and Landscape Officer.

Biodiversity

LP21 requires development to minimise impacts on biodiversity and geodiversity. A preliminary ecological appraisal has been submitted. The results are summarised below.

Reptiles: The site is considered to have moderate potential for use by the common reptile. There are many sites with higher value habitats for reptiles to the north-east, east and south-east of the site.

Great Crested Newts: There are many records for great crested newts from the area; the majority originate from Linwood Warren approximately 500 metres from the survey site. Given the quality of the habitats associated with Linwood Warren and the Local Wildlife Sites located to the east of the survey site, it is considered unlikely that newts would seek out shelter and feeding opportunities on the site.

Bats: There are no trees on the site identified as having features with potential to support roosting bats. A Hibernating bat was spotted within the roof void of the existing bungalow which falls outside the application site.

Birds: Common species. The hedgerows, trees, scrub, grassland and buildings on site all have high potential for nesting birds.

Schedule 1 species. The site, was not deemed suitable for nesting by any Schedule 1 bird species.

Water vole No sign of water vole was recorded and the potential for this species to occur is very low.

The habitats and plant species recorded on the site are common and widespread in the local area and in the country.

The habitats of significance for local biodiversity are Hedgerows; Broad-leaved woodland; Trees and scrub. Where possible these habitats should be retained although it is noted that one of the hedgerows would meet the criteria to class as ‘important’. It will be necessary to remove sections of hedgerow in connection with access to the site and ensuring adequate and safe visibility; in mitigation it is recommended that at least an equivalent length (preferably more) is replanted using locally native and appropriate species.

Recommendations

- Sets out precautionary working practices for great crested newt
- Any works to the trees, scrub, buildings and hedgerows should commence outside the active nesting season which typically runs from March through to late August. If work commences during the bird breeding season, a search for nests should be carried out before it begins, and active nests should be protected until the young fledge.
- Consideration should be given to the provision of nest boxes within the development. As the UK sparrow population has suffered a severe decline of late it is recommended terrace sparrow boxes are placed around the site on any permanent structures created as part of the development (reception buildings or storage buildings).
- Recommendations for ecological enhancement: Removal of the existing hedgerows on the site should be avoided where possible and kept to a minimum if unavoidable. Any removal of hedgerows should be compensated for by re-planting at least the amount that is lost using native species. Grassed areas between the caravans on the site should be seeded with appropriate wildflower mixes. Seeding of any amenity areas between the caravans should use a flowering lawn mixture, such as Emorsgate Seeds, which is resistant to regular mowing.

It is noted that objections have been received stating that the application cannot be properly considered in the absence of the recommended further surveys. These surveys, however, relate to the presence of bats within the existing bungalow which does not form part of the application. Concerns have been raised about lighting on the site having a negative impact. No floodlights are proposed. What is proposed will be directional based modern low-level lighting (e.g. bollard lighting) to avoid any light spillage. Details of lighting will be conditioned. On this basis subject to this and the imposition of conditions in relation to precautionary working practices and ecological enhancement there is no reason to withhold consent on biodiversity grounds. It would be in accordance with LP21.

Noise and disturbance

It is noted no objection has been raised by Environmental Protection to the proposal. The Masterplan shows distance separation ranging from 12m to 50m from the eastern boundary of the site with the Nature Trail Park and what is believed to be an associated dwelling. A condition will require adherence to it. On this basis there is no reason to withhold consent on the grounds of noise and disturbance. It would be in accordance with LP26.

Previous refusals of permission

The pattern of activity and usage of holiday accommodation is of a different character and nature to permanent residential use. A dwelling could need regular and repeated access to schools, employment and medical services as an example. This would not be the case for people in holiday accommodation and this is reflected in the appeal decision. A condition will be imposed ensuring holiday accommodation use only.

Foul Drainage

The objection from the Environment Agency is raised on the basis of non mains disposal. In rural locations mains drainage may not be readily available in close proximity. On this basis if connection to a public sewer is not feasible non-mains foul sewage disposal can be considered. The applicants have contacted Anglian Water who have confirmed that a public sewer exists some 550m away to the west, capacity exists for the relevant flows, and it is technically feasible to connect to this sewer. Unless it is not feasible for costs or practicability reasons, the applicant has agreed to a public sewer connection. This is capable of being dealt with by imposition of an appropriately worded planning condition.

Planning balance and conclusion

This is an application for a caravan park on a site between two existing sites offering holiday accommodation. In this context whilst not meeting the delivery of “overriding benefits” set out by LP 7 on balance the location can be supported in principle. The objections raised on the grounds of highway safety are noted but are not accepted by the authority responsible for highway safety. Visual and ecological impacts as set out above are not considered a reason to withhold permission and other matters in relation to drainage and noise and disturbance are capable of being dealt with by appropriately worded conditions. Overall it would accord with the provisions of the Central Lincolnshire Local Plan.

Recommendation: Grant Permission subject to the following conditions

Conditions stating the time by which the development must be commenced:

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: To conform with Section 91 (1) of the Town and Country Planning Act 1990 (as amended).

Conditions which apply or require matters to be agreed before the development commenced:

2. No site clearance or other works shall commence on site until details of the proposed external appearance of the caravans and reception building have been submitted to and approved in writing by the Local Planning Authority. The caravans placed on the site must be in accordance with the approved details

Reason: In the interests of safeguarding the character and appearance of the site and wider area in this rural location in accordance with policy LP 26 of the Central Lincolnshire Local Plan.

Conditions which apply or are to be observed during the course of the

development:

3. Works shall take place on the site in full accordance with the recommendations of the Preliminary Ecological Appraisal prepared by Helen Scarborough dated 7th February 2022. In particular the precautionary working practices for great crested newt and reptile species; any works to the trees, scrub, and hedgerows should commence outside the active nesting season which typically runs from March through to late August. If work commences during the bird breeding season, a search for nests should be carried out before it begins, and active nests should be protected until the young fledge.

Reason: In the interests of biodiversity in accordance with policy LP21 of the Central Lincolnshire Local Plan.

4. The site shall be laid out in accordance with Masterplan P206C16-13-REV F and the number of caravans must not exceed 79.

Reason: As the development was considered acceptable on this basis in the interests of the character and appearance of the site and wider area and impacts on neighbouring dwellings in accordance with policy LP26 of the Central Lincolnshire Local Plan.

Conditions which apply or relate to matters which are to be observed following completion of the development:

5. The caravans shall be used as holiday accommodation only and shall not be occupied as a person's sole or main place of residence. The owners/operators shall maintain an up-to date register of the names of all occupiers in individual caravans in the site, and of their main home addresses, and shall make this information available at all reasonable times and upon request, to the Local Planning Authority.

Reason: Permission is granted on the basis of holiday accommodation, in which policy LP7 of the Central Lincolnshire Local Plan has been applied. The site is in a location in which permanent residential occupation unrelated to holiday use would not be permitted and would otherwise be contrary to policy LP55 of the Central Lincolnshire Local Plan.

6. The development hereby permitted shall not be occupied before a footway, to connect the development to the existing footway network, has been provided in accordance with details that shall first have been submitted to, and approved in writing by, the Local Planning Authority. The works shall also include appropriate arrangements for the management of surface water run-off from the highway.

Reason: To ensure the provision of safe and adequate pedestrian access to the permitted development, without increasing flood risk to the highway and adjacent land and property in accordance with Policies LP13 and LP14 of the Central Lincolnshire Local Plan

7. Prior to occupation of any caravans on the site full details of the proposed means of surface water and foul water disposal must be submitted to and approved in writing by the Local Planning Authority. The agreed details must be implemented in full prior to occupation of any caravan.

Reason: To ensure a satisfactory scheme of drainage is provided in accordance with policy LP14 of the Central Lincolnshire Local Plan

8. Prior to occupation of any caravans on the site full details of both hard and soft landscape proposals shall be submitted to, and approved in writing by, the local planning authority. These details shall include, as appropriate, car parking layouts; other vehicle and pedestrian access and circulation areas; hard surfacing materials; and minor artefacts and structure (e.g. refuse or signs.). Soft landscaping details shall include planting plans; specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants, noting species, planting sizes and proposed numbers/densities where appropriate; A hedge along the northern boundary of the site in native species must form part of the submitted proposals.

All hard and soft landscape works shall be carried out in accordance with the approved details prior to the occupation of any part of the development or in accordance with a timetable approved in writing by the local planning authority. Any trees or plants which, within a period of five years after planting, are removed, die or become seriously damaged or defective, shall be replaced in the next planting season with others of species, size and number as originally approved, and permanently retained.

Reason: In the interests of helping to assimilate the site within its rural location and in the interests of biodiversity in accordance with policies LP17, LP21 and LP26 of the Central Lincolnshire Local Plan.

9. Prior to the occupation of the caravans details of 4 sparrow boxes and their location across the site must be submitted to and approved in writing by the Local Planning Authority. The details approved must be implemented prior to occupation of caravans on the site.

Reason: In the interests of biodiversity in accordance with policy LP21 and specifically as the UK sparrow population has suffered a severe decline.

10. No external lighting shall be erected unless full details of the position, type and light intensity of all external lighting has been provided and proposed mitigation in relation to the proposed lighting to minimise light pollution has been submitted to and approved in writing by the Local Planning Authority. The approved external lighting shall only be carried out in accordance with the approved details and retained as such thereafter.

Reason: To ensure that there is minimal light spill from the site which would have an impact on this mostly unlit night environment in accordance with the NPPF and Policy LP17 and LP26 of the Central Lincolnshire Local Plan.

