

# **Officers Report**

## **Planning Application No: 135610**

**PROPOSAL:** Planning application for change of use of land to site 35no. holiday lodge caravans and 1no. site office/reception caravan.

**LOCATION:** Kingsmead Park Swinhope Market Rasen LN8 6HS

**WARD:** Wold View

**WARD MEMBER(S):** Cllr T Regis

**APPLICANT NAME:** Mr Matthew Monteith

**TARGET DECISION DATE:** 06/07/2017 (Extension of time agreed until 22<sup>nd</sup> September 2017)

**DEVELOPMENT TYPE:** Major - Other

**CASE OFFICER:** Ian Elliott

**RECOMMENDED DECISION:** Grant Permission subject to conditions

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### **Description:**

The proposal is for a change of use of land to site 35 holiday lodge caravans and a site office/reception caravan with associated site road, parking and services.

The application has been referred to the Planning Committee at the request of the Ward Member. Members of the Planning Committee visited the site on 2<sup>nd</sup> October 2017 prior to the Planning Committee on 18<sup>th</sup> October 2017. The recommendation remains unchanged.

The application site is a plot of grassland (3.50 hectares in area) sat between the north east settlement edge of Brookenby and the south west boundary of Kingsmead Park, a residential caravan park. The site is not in active arable use or being used for grazing. The site is slightly overgrown and slopes upwards from the south east to the north west. It is set just back from and above the level of the highway. The site is screened to the north east by a mix of low fencing, high hedging and occasional open gap. The south east boundary is screened by very high hedging with high trees and hedging screening the north west boundary. The south west boundary is screened by high trees/hedging and metal fencing. A residential caravan park (Kingsmead Park) comprising up to 72 units is immediately adjacent to the north east. Open Countryside sits to the south east and north west. The land to the south east slopes downwards and then rises again towards the B1203. The land to the north west continues to gently rise to the north west. Neighbouring dwellings off Salisbury Avenue sit to the south west. The site is located within an Area of Outstanding Natural Beauty (AONB) with natural and semi natural green space adjacent. The nearest Public Rights of Way (PRoW) are as follows:

- Swhp/143/1 is approximately 122 metres to the north east.
- Binb/135/2 is approximately 560 metres to the south.
- Swhp/146/1 is approximately 1050 metres to the north east.

- Swhp/147/1 is approximately 1,800 metre to the east.

There are a number of Listed Buildings and Scheduled Ancient Monuments (SAM) in the local area. These are:

- Swinhope House – Grade 2 Star Listed approximately 575 metres to the north east.
- The Old Rectory - Grade 2 Listed approximately 665 metres to the north east.
- Church of St Helen – Grade 2 Listed approximately 720 metres to the north east.
- Ash Hill long barrow in Swinhope Parish is approximately 220 metres to the north east
- Neolithic long barrow is approximately 500 metres to the south east
- Cromwells Grave a Neolithic long barrow is approximately 645 metres to the south east.

### **Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017:**

The development is within a 'sensitive area' as defined in Regulation 2(1) of the Regulations (the Lincolnshire Wolds Area of Outstanding Natural Beauty) and has therefore been assessed in the context of Schedule 2 of the Regulations. After taking account of the criteria in Schedule 3 it has been concluded that the development is not likely to have significant effects on the environment by virtue of its nature, size or location. Therefore the development is not 'EIA development'.

### **Relevant history:**

125478 - Application for a Lawful Development Certificate of existing use of land as recreational/amenity use in conjunction with mobile home park - 23/03/10 - Refused

### **Representations**

**Ward member(s):** Representation received (27<sup>th</sup> April 2017) from Cllr T Regis: I would like to request that Planning Application number 134610 is called in to committee if it is not refused under delegated powers for the following reasons:

- Detrimental visual impact on the AONB.
- Insufficient highway infrastructure to support the development.
- Significant lack of local amenity to make the development sustainable.
- Very considerable local opposition to the application as lodged on WLDC website.

Representation received (22<sup>nd</sup> August 2017) from Cllr L Strange:

I find this application unsupportable, on the same grounds as Cllr Tom Regis local member, and also in support of our Wolds manager (Mr Stephen Jack.). I cannot emphasize enough the importance of a green wedge being maintained on this site between caravan/stationary caravans developments at Swinhope near Brookenby, the AONB is very special (the only one in the East of England). We must protect it. As Mr Jack states other caravan developments in the area may not have been allowed

had the AONB designation been established before the inclusion of adjacent caravan/mobile home sites.

**Sir Edward Leigh MP:** Objection

I fully support my constituent's objections as the proposal would dramatically alter the quality of life for people who live in and around the area.

**Brookenby Parish Council:** Objections

- It is a greenfield site having had a previous application refused.
- Concerns around the road network and increased traffic.
- Intrusion into the countryside and nature conservation.

**Binbrook Parish Council:** Objections

- Concerns on the road network
- Increase in traffic in the area
- Infrastructure in regards to sewage

**Local residents:** Objections have been received from:

- 1, 2, 5, 6, 7, 9, 10, 10a, 14, 15, 19, 21, 24, 26, 32, 34, 35, 36, 37, 41, 43, 48, 52, 53, 54, 56 and 60 Kingsmead Park, Swinhope
- 2, 3, 6, 8, 10, 12 and 14 Salisbury Avenue, Brookenby
- 4 York Road, Brookenby
- 27 Newbury Avenue, Great Coates

Their comments, in summary:

Visual Impact/Area of Outstanding Natural Beauty

- Harm the character of this beautiful area, the appearance of the AONB and this rare unique green site.
- Adverse visual impact on the landscape and the site.
- Out of keeping and scale of the area and its surroundings.
- Inadequate screening of lodges and requires 15 metre high to front which will take years.
- Light pollution on the surrounding area.

Highway Safety

- Additional traffic on fragile infrastructure. Already used by buses and vehicles including agricultural vehicles.
- Swinhope road is unsuitable in terms of width and visibility.
- No passing places pushing vehicles onto grass verge.
- No footpath or street lights.
- Access near to bends.
- Need to widen Swinhope Road.
- Report on car speeds is totally and utterly wrong.

Residential Amenity

- Loss of quiet relaxed area from additional traffic noise, holiday makers and children.

- Invasion of privacy on adjacent Kingsmead Park and Salisbury Avenue residential properties including enjoyment of their respective garden.
- Loss of light on Kingsmead Park by 5 metre hedge barrier.
- Overbearing impact as shoehorned between residential dwellings.
- Loss of use of field for recreational purposes including walking dogs.
- Noise and dust distribution from construction phase.
- Loss of view from Salisbury Avenue.
- Light pollution.
- Concerns over Security.

#### Sustainability

- Unsustainable location.
- Non-existent bus service.
- Amenities not within walking distances.

#### Drainage/Flooding

- Level of water pressure will be tested.
- Impact on drainage system.
- Highway has flooded five times in 2017 since 29<sup>th</sup> June 2017.

#### Ecology

- Negative and irreversible impact on Fauna/Flora.

#### Public Rights of Way

- No nearby Prow or scenic walks

#### Employment

- 1 full time and 1 part time employee opportunities not enough benefit to justify location and application.

#### Other

- Intention is for future residential caravan park on the site.
- 125478 refused for recreational use as designated open countryside and agricultural land.
- Contrary to PPS3.
- Previously told by WLDC no development on land.
- No encouragement to holiday makers.
- Decrease in value of homes.
- Damage from trees roots of proposed screening on concrete bases.
- Overhanging branches and loss of TV signal from proposed screening.
- Already two other holiday parks within 6 miles. These are Laceby (20 concrete basis only occupied by 9 lodges) and Willow Lakes.

**LCC Highways:** No objections subject to conditions and advisory note:

- Before the access is brought into use the land between the highway boundary and the vision splays indicated on drawing number G08167/15/002 Rev B dated 29/9/16 shall be lowered so that it does not exceed 1.0 metres above the level of

the adjacent carriageway Swinhope Road and thereafter the visibility splay shall be kept free of obstacles exceeding 1.0 metres in height.

- The vehicular access shall incorporate 6 metres radii tangential to the nearside edge of the carriageway of Swinhope Road and the minimum width of the access shall be 5 metres.
- Prior to the submission of details for any access works within the public highway you must contact the Divisional Highways Manager on 01522 782070 for application, specification and construction information.

**LCC Lead Local Flood Authority:** No objections

**Building Control Officer:** No objections  
No problems with their surface water proposals.

**Environment Agency:** No objections  
Having reviewed the information the Environment Agency does not wish to make any comments on this application.

**Archaeology:** No objections.

After requesting further information, further response received 1<sup>st</sup> August 2017:  
The trial trenching did reveal some archaeological features however these were limited and did not suggest that this site contained any significant archaeological remains. Given this I do not recommend that any further archaeological work on this site is necessary.

**Lincolnshire Wolds Countryside Service:** Objections  
We have concerns that the proposal will have a significant and harmful impact upon the local character of the Lincolnshire Wolds AONB, which is a nationally protected landscape on account of its special scenic qualities and rural charm.

The change of use as detailed, would cause significant harm to an important area of open space. As evidenced within the statutory Lincolnshire Wolds AONB Management Plan (2013-18), grassland sites and public open space in general, is very limited across the Lincolnshire Wolds and has been a key target for future habitat restoration and connectivity.

Whilst we are supportive of a wide range of tourism and recreational interests across the Lincolnshire Wolds AONB this is secondary to the primary objective of preserving the area's nationally important scenic beauty, including the area's undoubted tranquillity and rural charm. On balance we therefore object to the proposal for a change of use.

**Conservation Officer:** No objections and comments

Response received 22<sup>nd</sup> August 2017:  
I am reasonably content at the quality of the report in terms of impact upon heritage assets.

From a good design perspective, I think absolutely imperative that if this is approved, that the lodges have green roofs as an absolute, and that unless there is strong screening between lodges, that these are green too.

Response received 22<sup>nd</sup> May 2017:

It is my view that this proposal should not affect the close settings of most of the heritage assets around it (Swinhope Hall, Old Rectory). However, the scheduled monuments do have a shared wider setting and group value. The proposal in its current form does not improve that wider setting, or the quality of the AONB.

**Public Protection:** No objection

No reasons to object to this proposal from a noise perspective.

**Tree and Landscape Officer:** No objections with comments

I have no objections in terms of impact to existing trees or hedges, but the site is clearly visible from various locations on nearby roads within the AONB and having a negative impact on countryside views. If permission is granted, it would require a scheme of landscaping to improve screening.

**Economic Development:** Supports

In principle, and subject to normal planning considerations, the Leisure & Cultural Services Team are supportive of the above application from a visitor economy perspective.

Tourism is a major sector in West Lindsey bringing into the area around £116m in revenue and supporting c1740 full time jobs (STEAM data 2015).

The provision of quality accommodation facilities for visitors is an important element for future sustainable development within the district and any initiative which promotes this will add value to the current product, bringing visitors who will aid the economy for local businesses and residents, as well as supporting the local authority aspiration of being a prosperous and enterprising district where an increased number of businesses and enterprises can grow and prosper.

### **Relevant Planning Policies:**

Central Lincolnshire Local Plan 2012-2036 (CLLP)

Following adoption on 24<sup>th</sup> April 2017 the CLLP forms part of the statutory development plan. Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The policies considered relevant are as follows:

LP1 A Presumption in Favour of Sustainable Development

LP2 The Spatial Strategy and Settlement Hierarchy

LP5 Delivering Prosperity and Jobs  
LP7 A Sustainable Visitor Economy  
LP13 Accessibility and Transport  
LP14 Managing Water Resources and Flood Risk  
LP17 Landscape, Townscape and Views  
LP21 Biodiversity and Geodiversity  
LP25 The Historic Environment  
LP26 Design and Amenity  
LP55 Development in the Countryside

<https://www.west-lindsey.gov.uk/my-services/planning-and-building/planning-policy/central-lincolnshire-local-plan/>

#### Neighbourhood Plan

Swinhope has to date not declared any interest in starting the process of creating a neighbourhood plan.

#### National Guidance

National Planning Policy Framework

<https://www.gov.uk/government/collections/planning-practice-guidance>

National Planning Practice Guidance

<https://www.gov.uk/government/collections/planning-practice-guidance>

#### Other

Lincolnshire Wolds AONB Management Plan (2013-18) (LWMP)

<http://www.lincswolds.org.uk/looking-after/lincolnshire-wolds-aonb-management-plan>

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990

<http://www.legislation.gov.uk/ukpga/1990/9/section/66>

West Lindsey Landscape Character Assessment (WLLCA) (August 1999)

<https://www.west-lindsey.gov.uk/my-services/planning-and-building/planning-policy/evidence-base-and-monitoring/landscape-character-assessment/>

West Lindsey Countryside Design Summary (WLCDS) (December 2003)

<http://docs.west-lindsey.gov.uk/WAM/doc/Other-642077.pdf?extension=.pdf&id=642077&appid=1001&location=VOLUME2&contentType=application/pdf&pageCount=1>

Natural England's East Midlands Agricultural Land Classification Map 2010

<http://publications.naturalengland.org.uk/publication/143027>

#### **Main issues:**

- Principle of the Development  
*Central Lincolnshire Local Plan 2012-2036*  
*National Planning Policy Framework*

*Assessment of Local Policy LP7*

*Agricultural Benefit*

*Concluding Assessment*

- Landscape and Visual Impact
- Residential Amenity
- Heritage

*Listed Buildings and Scheduled Ancient Monuments*

*Archaeology*

- Highway Safety
- Ecology
- Drainage

*Foul Water*

*Surface Water*

- Trees

**Assessment:**

Principle of the Development

Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.

*Central Lincolnshire Local Plan 2012-2036:*

Local policy LP7 of the CLLP states ‘*The visitor economy is one of the most important sectors of Central Lincolnshire’s economy*’ and ‘*Policy LP7 aims to encourage sustainable growth in the visitor economy*’.

Furthermore Local policy LP7 sets out the criteria for assessing the acceptability of holiday caravan developments. LP7 states that ‘*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:*

- contribute to the local economy*
- benefit both local communities and visitors*
- respect the intrinsic natural and built environmental qualities of the area*
- 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.*

*National Planning Policy Framework:*



Guidance contained within paragraph 28 of the NPPF states that *'Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:*

- *support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres'*

Paragraph 115 states that:

*"Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas..."*

Paragraph 116 of the NPPF goes on to state that:

*'Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:*

- *the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- *the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and*
- *any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.*

#### *Assessment of Local Policy LP7:*

The application is located between the north east settlement boundary of Brookenby and the south west boundary of Kingsmead Park. Binbrook is approximately 1.5 miles away using the highway network. There is no pedestrian footpath facilities from the site until you get to the junction of Swinhope Road and Orford Road. The settlement of Brookenby includes limited services and facilities in the form of a village hall, St Michaels and All Angels Church and Brookenby Business Park. Binbrook has more services and facilities such as a primary school, child care nursery, village hall, village shop, hairdressers, public house, playing field and St Mary's and St Gabriel's Church. Therefore Brookenby in its own right has a limited amount of services but more services are available within Binbrook either by bicycle or a very short car journey.

There is a bus stop outside Kingsmead Park but this provides a very limited service between Ludford and Grimsby. Brookenby is served by a bus service to Market Rasen and a school bus to Binbrook. The nearest railway is in Market Rasen approximately 9 miles away.

The proposal given its position in an AONB will attract visitors into the area which will provide a contribution to the local economy through using local services in the immediate area and other local areas such as the Historic Town of Caistor and the Town of Market Rasen. The visitors will additionally contribute by visiting tourist attractions around the local area. The proposal will additionally employ one full-time and two part-time employees.

The proposed site is sensitively located within an AONB, close to a mix of residential built forms and structures. The sites position, characteristics and boundary treatments means that the site has the potential to have biodiversity impact as well as a visual impact. Visual and ecology impacts will be assessed later in the report.

The site is situated adjacent to an existing settlement as defined by local policy LP2 of the CLLP. The site is in the open countryside and provides an open clear gap between the settlement of Brookenby and Kingsmead Residential Caravan Park. This part of LP7 states that development of this nature should be located within existing settlements unless such locations are unsuitable and there “is an overriding benefit to the local economy and/or community and/or environment for locating away from such built up areas”. The development does not expand an existing visitor facility.

A holiday caravan park does not immediately lend itself to being located within an existing settlement. Nonetheless, the site sits immediately upon the settlement boundary within a field located between the built up area and the already established Kingsmead Residential Caravan Park. It is in effect filling a gap between these two developed areas, and cannot be considered to be located “away” from a built up area. Furthermore it would provide benefits to the local economy and tourism sector through the provision of holiday accommodation within the AONB.

In this case it is considered that the proposal will be adjacent two settlements of differing types therefore will not be an isolated development in the open countryside but adjacent two adjoining residential areas. As previously stated the development will make a contribution to the local economy and community.

It is concluded that the proposed development would accord with policy LP7 of the Central Lincolnshire Local Plan.

#### *Agricultural Benefit*

Guidance contained within Paragraph 143 states that ‘*safeguarding the long term potential of best and most versatile agricultural land and conserving soil resources*’ The field is classed in Natural England’s East Midlands Agricultural Land Classification Map as grade 2 (very good) and 3 (good to moderate). This designates the site as being productive to fairly productive for agricultural use. The site is 3.50 hectares in size and is currently not used for an agricultural use. The submitted Landscape and Visual Appraisal dated July 2017 states in paragraph 3.4.1 that the site has ‘*a moderately sloping gradient limitation, which restricts the use of some agricultural machinery*’ and ‘*it is an individual field allied to the existing caravan park and does not form part of an agricultural holding, or a larger farm enterprise*’. The development will lead to a loss of agricultural land but its loss is not considered as significant.

#### Landscape and Visual Impact

Objections have been received from Ward Members, Brookenby Parish Council, Lincolnshire Wolds Countryside Officer, WLDC Conservation Officer and residents on the harmful impact of the development on the AONB and its landscape qualities.

Guidance contained within paragraph 115 of the NPPF states that *'Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty'*.

Local policy LP17 states that *'To protect and enhance the intrinsic value of our landscape and townscape, including the setting of settlements, proposals should have particular regard to maintaining and responding positively to any natural and man-made features within the landscape and townscape which positively contribute to the character of the area, such as (but not limited to) historic buildings and monuments, other landmark buildings, topography, trees and woodland, hedgerows, walls, water features, field patterns and intervisibility between rural historic settlements'*.

Developments should also *'be designed (through considerate development, layout and design) to preserve or enhance key local views and vistas'*

*'The considerations set out in this policy are particularly important when determining proposals which have the potential to impact upon the **Lincolnshire Wolds AONB** (emphasis added) and the Areas of Great Landscape Value'*

Local policy LP26(c) states *'All development proposals must take into consideration the character and local distinctiveness of the area (and enhance or reinforce it, as appropriate) and create a sense of place. As such, and where applicable, proposals will be required to demonstrate, to a degree proportionate to the proposal, that they:*

*(c) Respect the existing topography, landscape character and identity, and relate well to the site and surroundings, particularly in relation to siting, height, scale, massing, form and plot widths;'*

The application has included a Landscape and Visual Appraisal (LVA) dated July 2017 published by Hankinson Duckett Associates. In summary the LVA concludes that:

- *Existing landscape features would be retained and protected throughout the course of the development.*
- *15m landscape buffer would be retained, adjacent to existing features along the boundaries.*
- *The character of the site would change from a meadow to a rural, low-density holiday lodge development. This would have an initial adverse effect on the character of the site, although the lodges would be of a high quality design, constructed of sympathetic natural materials. The effects on landscape character would substantially reduce as the proposed landscape planting establishes, with in the longer term, negligible residual effects. The proposals would be in keeping with the adjacent development of Kingsmead Park, but would be significantly lower in density and include a more extensive landscape strategy.*

- *The change in character of the site would be noticeable but not significant when viewed from the surrounding AONB, the effects after 10 years being of negligible residual effect.*
- *The proposed development would have no overall adverse impact on the character of the AONB and in terms of landscape structure the proposals would, in the longer term, enhance the character and appearance of the AONB.*

The West Lindsey Landscape Character Assessment (WLLCA) defines the key characteristics of this landscape character area as *'open, rolling arable farmland on Wold's dip slope, with dramatic, inward facing valleys and dry valley features'* and *'most roads run east-west along low ridgelines, many with wide verges backed by hedgerows and hedgerow trees, characteristics of ancient enclosure roads'*. Plus the *'Former RAF Binbrook airfield and its associated housing has a wide influence on the landscape'*. The site is considered to be in a sensitive landscape due to its position in the Lincolnshire Wolds. The WLLCA finds that any new development require high standards of siting and design in this distinctive and sensitive landscape. Building materials are predominantly brick, with some chalk and pantile roofs.

The contents of the LWMP has to be considered and it's protection of the AONB, its qualities and scenic beauty. Objective PO (page 80) seeks to *'ensure that development plans and planning guidance consistently recognise and uphold the primary purpose of the Lincolnshire Wolds AONB designation – the protection and enhancement of its natural beauty and special character'*. This includes ten policies (PP1-PP10) to meet this objective.

As previously stated the application site is currently an area of overgrown grassland which provides an open gap between Brookenby and Kingsmead Park. The application has included some indicative caravan lodge designs through the submission of sales brochures (Kingfisher, Wessex Classic, Wessex Contemporary and Westfield) as eluded to on page 5 of the Planning Statement (PS) dated December 2016. Paragraph 5.3 of the PS declares that *'the holiday lodges will be in sympathy with the surrounding landscape, clad in timber, or wood effect 'canaxel' comprising muted colours compatible with this location such as grey/green/brown, with dark brown/grey tiled roof pitched roofs. There are a range of colours and external finish available on today's holiday lodge models and our client would be willing to discuss appropriate choices with the Council to ensure that the finished scheme assimilates well with the landscape'*. The Authority's Conservation Officer has recommended the caravan lodges have green roofs.

The proposal is low in density when compared to Kingsmead Park and includes extensive soft landscaping (see site plan 804.02/02B dated July 2017) to thicken and increase the screening ability of the site to the immediate and wider areas. Paragraph 5.4 of the PS states that *'External lighting within the proposed development will be designed to minimise its visual intrusion on the surrounding countryside with low level bollard lighting'*.

The final caravan lodge design(s) and landscaping and management plan will be conditioned on the permission to be agreed prior to commencement of the development.

The case officer's site visit included visiting a number of vantage points from the immediate and wider area including appropriate public rights of way. This included views from Orford Road, Swinhope Hill, the B1203, from within the settlement of Binbrook and the Swinhope hamlet and in particular views from public rights of way Binb/135/2.

Given the close proximity of Brookenby (rear of dwellings off Salisbury Avenue) and Kingsmead Park the site is immediately in view through or above existing boundary treatments from the north east, south east and south west. The slope of the site, its existing boundary treatments and the adjoining uses means that the site is only clearly in view from the wider area of the AONB from the south east. From the south east the site is in view from Binb/35/2, Swinhope Hill and the B1203.

Binb/35/2 is a u-shaped public rights of way which from either starting point heads towards Brookenby before turning back on itself back towards Binbrook. The site is in view from sections of the rights of way but land levels and vegetation screen the site from all other sections. The site is to the north west of Binb/35/2 and any views of the site are seen in context with Brookenby and the existing residential caravans at Kingsmead Park.

The site again is in view from sections of Swinhope Hill and the B1203 which in the main has a national speed limit of 60 mph. Good screening is provided in other sections by highway boundary vegetation and/or vegetation within the landscape. Swinhope Hill and the B1203 by and large go in a north or north east direction between Binbrook and the Swinhope area. Conversely these highways go to the south and south west in the other direction. The site is therefore not directly or clearly in view when travelling in either direction unless you stop or drive at a very slow speed on a 60mph highway. When travelling at a normal speed the site is most evident when travelling south west along the B1203 approaching the Swinhope and Brookenby junctions. Again from some points the site will be viewed in context with Brookenby and the existing residential caravans at Kingsmead Park.

The introduction of the site next to Kingsmead Park means that the cumulative impact of caravan structures in this location has to be considered. The proposed development has a much lower density than Kingsmead Park and will include more sympathetic caravan designs (timber effect cladding and colours to be agreed) and boundary screening.

Consideration has been given to the special qualities of the AONB, the characteristics of the site and its surrounding area plus the visibility of the site from all directions. Due regard has also been given to comments made from representations and supporting statements with the application. Given this it is considered that the development will initially have some adverse visual impact due to the need for planting to mature to a height to provide adequate screening but overall it will not have a significant long term adverse visual impact on the character and appearance of the site, the AONB and the surrounding open countryside. The proposal will accord with local policy LP17, LP26 of the CLLP and guidance contained within the NPPF subject to satisfying pre-commencement conditions.

#### Residential Amenity

Objections have been received from Sir Edward Leigh and residents on the harmful impact of the development on the living conditions of neighbouring residential dwellings and caravans.

The application site is adjacent two differing residential areas. To the north east is Kingsmead Residential Caravan Park where approximately 14 units sit adjacent the shared north east boundary. To the south west is the rear gardens and elevations of 2, 4, 6, 8, 10, 12 and 14 Salisbury Avenue.

The proposed caravan lodges will be single storey structures and positioned at least 15 metres from each boundary. The proposal will introduce low and high level soft landscaping onto the site and its boundaries to increase the density and height of screening to the neighbouring residential uses. Therefore the proposal will not have a significant adverse overbearing impact, cause a significant loss of light or have a significant impact on the privacy of the neighbouring residents.

Objections have been made in relation to noise from the proposed operation and noise and dust from the site during construction.

The West Lindsey Public Protection Officer has not objected to the proposal stating that there are '*No reasons to object to this proposal from a noise perspective*'. The site will introduce noise from holiday makers and vehicle use. The vehicular access and caravan park road are situated at least 15 metres from the neighbouring residents and the on-site road configuration promotes low speed. Given the separation distance and proposed increase in landscaping it is not considered that the site will have a significant noise impact on the nearby residents.

The development will require limited construction work in the form of works including the installation of the caravan parks on-site road and the individual pitches which involves getting them connected to the necessary services. The caravan lodges will be transported to the site and delivered onto the individual pitches. The construction phase is only a minor temporary disruption and any works on the site will be limited to a specific timeframe through a condition on the permission. These times will be:

- Monday to Friday: 9.00-18.00
- Saturday: 9.00-13.00
- Not on a Sunday or Bank Holiday

In addition to this a condition will be attached to the permission for a construction method statement including the installation of the caravan lodges.

The use of vehicles around the site has the potential to create a headlight glare impact on the neighbouring residents. Given the landscaping proposed and predominant direction of the on-site road the neighbouring residents will not be expected to be harmed by headlight glare.

The loss of view caused by the development has been objected to from Salisbury Avenue. However a loss of view is not a material planning consideration that can be assessed.

It is therefore considered that the proposal will not have a significant adverse impact on the living conditions of neighbouring residents. The proposal accords to local policy LP26 of the CLLP and guidance contained within the NPPF.

## Heritage

### *Listed Buildings and Scheduled Ancient Monuments:*

As stated in the description section at the start of this report there are a number of Listed Buildings and Scheduled Ancient Monuments (SAM) in the area. These are:

- Swinhope House – Grade 2 Star Listed approximately 575 metres to the north east.
- The Old Rectory - Grade 2 Listed approximately 665 metres to the north east.
- Church of St Helen – Grade 2 Listed approximately 720 metres to the north east.
- Ash Hill long barrow in Swinhope Parish is approximately 220 metres to the north east
- Neolithic long barrow is approximately 500 metres to the south east
- Cromwells Grave a Neolithic long barrow is approximately 645 metres to the south east.

Guidance contained within Paragraph 128 of the NPPF states that *‘in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance’.*

Paragraph 132 states that *‘great weight should be given to the asset’s conservation’* and that *‘Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting’.*

Paragraph 133 provides guidance that *‘Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent’.*

Local policy LP25 of the CLLP states that *‘Development proposals should protect, conserve and seek opportunities to enhance the historic environment of Central Lincolnshire’* and provides a breakdown of the required information to be submitted as part of an application in a heritage statement.

In the Listed Building section of LP25 it states that *‘Development proposals that affect the setting of a Listed Building will be supported where they preserve or better reveal the significance of the Listed Building’.*

The impact of a development of the setting of a listed building is more than just its visual presence and annex 2 of the NPPF defines the setting of a heritage asset as:

*'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'.*

Paragraph 13 (Conserving and Enhancing the Historic Environment) of the NPPG (Reference ID: 18a-013-20140306) further supports this definition declaring that *'Setting is the surroundings in which an asset is experienced, and may therefore be more extensive than its curtilage'* and *'although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors'*. This interpretation can additionally be attached to the nearby Scheduled Ancient Monuments.

The LVA submitted includes an assessment of the developments impact on the nearby heritage assets. Paragraph 9.2 of the LVA states that *'a number of Scheduled Monuments and listed buildings are located within the local area. Only three of the historic features have a visual connection with the proposed development; none of the monuments would be significantly affected by the proposed development. The proposed layout and planting would minimise the effects through screening the proposals and integrating them into the local landscape (Local plan Policy LP25). The proposed development would have negligible effects on the landscape setting of these historic features.* The Conservation Officer is *'reasonably content at the quality of the report in terms of impact upon heritage assets'* and has not objected to the development on the setting and experience of the nearby Listed Building and Scheduled Ancient Monuments.

Therefore the development is concluded not likely to have a significant adverse impact on the nearby Listed Buildings and Scheduled Ancient Monuments and accords to local policy LP25 of the CLLP and guidance contained within the NPPF. The setting of surrounding heritage assets will be preserved.

#### *Archaeology:*

In light of comments made by the Historic Environment Officer at Lincolnshire County Council the agent has submitted a Programme of Archaeological Evaluation Trenching Report dated June 2017 published by Midland Archaeological Services in partnership with Contour Geophysics.

As acknowledged by the Historic Environment Officer the report demonstrates that *'the trial trenching did reveal some archaeological features however these were limited and did not suggest that this site contained any significant archaeological remains. Given this I do not recommend that any further archaeological work on this site is necessary'*.

Therefore the development is unlikely to have a significant adverse archaeological impact and accords to local policy LP25 of the CLLP and guidance contained within the NPPF.



### Highway Safety

Objections have been received from the Ward Member, Brookenby Parish Council, Binbrook Parish Council and residents on the harmful impact of the development on highway safety.

Guidance contained within paragraph 32 of the NPPF states that '*Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe*'.

The proposal will introduce a new vehicular access relatively close to the east corner of the site. The existing agricultural gated access will be removed and replaced by new soft landscaping. The access will come off Swinhope Road which has a national speed limit of 60mph. There is a modest bend approximately 150 metres to the south west and a sharp bend approximately 135 metres to the north east which could reduce the speed of vehicles passing the site.

Each of the individual pitches will have their own parking space for at least two vehicles and six parking spaces will be available adjacent the reception office for customers checking in and out of the site.

The Highways Authority at Lincolnshire County Council have not objected to the development subject to the attachment of conditions. One of these conditions is to lower part of the front hedging to no more than 1 metre in height to allow acceptable visibility when turning south west onto Swinhope Road.

Objections have been received in relation to the increase in traffic and the impact on the condition of the highway and the grass verges. The highway is a public highway which can be used by any people travelling in the area although it is acknowledged that the development will increase the amount of traffic using Swinhope Road. The Highway Authority have not objected to the impact on the condition of the highway or grass verges or the need for passing places or to widen the highway.

Therefore the development will not have a severe or significant adverse impact on highway safety and accords to local policy LP13 of the CLLP and guidance contained within the NPPF subject to meeting recommended conditions.

### Ecology

Guidance contained within paragraph 118 of the NPPF states that '*when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying*' certain principles including:

- *if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- *'planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats'*
- *'opportunities to incorporate biodiversity in and around developments should be encouraged'*

Local Policy LP21 of the CLLP states that '*All development should:*

- *protect, manage and enhance the network of habitats, species and sites of international, national and local importance (statutory and non-statutory), including sites that meet the criteria for selection as a Local Site;*
- *minimise impacts on biodiversity and geodiversity; and*
- *seek to deliver a net gain in biodiversity and geodiversity.*

The importance of conserving and enhancing biodiversity is one of the key objectives set out in the Lincolnshire Wolds Management Plan (LWMP).

The application has included the submission of an Ecological Appraisal dated June 2017 completed by Hankinson Duckett Associates. Section 5 assesses the likely presence and habitat potential of the site for protected fauna and the presence of the protected flora on the site.

In line with the findings the Ecological Appraisal has made a number of recommendations in section 8. These include:

- Further surveys required to tree 1-5 and group 1 if further works required to trees such as felling.
- Precautionary approach to clearance taken to any suitable reptile habitat (see procedure at paragraph 8.3.4)
- Shrub, hedgerow, tree clearance carried out outside bird breeding season.
- Install bat roost boxes, bird boxes, log and brush piles.
- Creation of wildlife friendly pond with gently sloping margins and native aquatic/marginal planting
- Nectar rich fruit producing planting.
- Native species rich hedgerow planting.

The proposed development shall adhere to the recommendations of the Ecological Appraisal dated June 2017 completed by Hankinson Duckett Associates. All of the recommendations suggested are necessary and can be incorporated into the pre-commencement construction method statement and the landscaping plan conditions.

The proposal will not be likely to have an adverse impact on any protected species and will be expected to enhance biodiversity by introducing a significant amount of new planting and a sustainable urban drainage pond and swales. The proposal will accord with local policy LP21 of the CLLP and guidance contained within the NPPF subject to submitting further details.

#### Drainage

The application has included a drainage strategy report dated December 2016 published by GA Grimley Limited setting out the method of dealing with foul and surface water from the site.

#### *Foul Water:*

The Anglian water pre-planning assessment report dated 24<sup>th</sup> October 2016 states and recommends that:

- *The foul drainage from the proposed development is in the catchment of Binbrook Water Recycling Centre, which currently has capacity to treat the flows from your development site. Anglian Water cannot reserve capacity’.*
- *‘Anglian Water has assessed the impact of gravity flows from the planned development to the public foul sewerage network. We can confirm that this is acceptable as the foul sewerage system, at present, has available capacity for your site. The connection point will be to manhole 8600 located at land adjacent to Swinhope Road at National Grid Reference (NGR) TF2088195660’.*

The drainage strategy plan demonstrates that foul water will be disposed of to the existing foul sewer system at manhole 8600 as recommended and from the reception office to manhole 20. This is considered acceptable providing the necessary capacity is still available and the necessary consent can be obtained.

#### **Surface Water:**

The Anglian water pre-planning assessment report dated 24<sup>th</sup> October 2016 states that:

*‘You indicated on the Pre-Planning Application form that a connection to the public surface water sewer network is not required as infiltration and a connection to a watercourse is to be utilised. A new surface water sewer can be used as a mechanism to discharge surface water to a watercourse or as part of a Suds scheme where appropriate’.*

Surface water will be disposed of through a sustainable urban drainage system (SuDS). This will be via a network of surface water sewer and channels connected to infiltration swales with any excess water attenuating at the SuDS basin.

The surface water drainage method is considered acceptable by the Lead Local Flood Authority. The drainage strategy report includes percolation tests which have been accepted by the Authorities Building Officer.

The proposed surface water drainage proposal is therefore considered acceptable.

The proposal will therefore be conditioned to be completed in accordance with the drainage strategy report dated December 2016 published by GA Grimley Limited.

#### **Trees**

The Authority’s Landscape and Tree Officer has not objected to the impact of the development on the existing trees but has commented that some of the proposed trees may be too close to the caravan position along the southerly edge leading to future pruning requirements. Therefore the proposal will not have an adverse impact on trees and an advisory note will be attached to the permission in relation to the position of some of the proposed trees.

#### **Other Considerations:**

##### **Landscaping**

The application has included some landscaping details on submitted plan 804.02/02B dated July 2017. However this plan does not provide comprehensive details and a

pre-commencement condition will be attached to the permission for a further more detailed landscaping plan. The further details required are (including some ecology details):

- Identify all retained trees and hedgerows
- Identify all proposed plants, trees and hedgerows
- A planting scheme including species, position, height and planting formation of all new plants, trees and hedgerows. In addition ground/planting pit preparation, details of tree support and protection, and aftercare for 5 years.
- Materials used to construct the onsite road, parking spaces and pitches.
- The type and position of at least 1 bat roost and 3 bat boxes
- The type and position of four bird boxes
- Identify location of SuDS pond with section plan showing gently sloping margins and details of native aquatic/marginal planting

#### Flood Risk

The site sits within flood zone 1 therefore has the lowest risk of flooding therefore meets the NPPF sequential test.

#### Tourism

Recreation and tourism is a key subject of the LWMP providing no harm is caused to the AONB. Table 2 (page 35) of the LWMP sets out the pressures, threats and opportunities of the tourism industry within AONB's.

#### Pressures/Threats:

- Developing tourism is currently restricted by a weak infrastructure (e.g. limited accommodation, attractions)
- Threat to peace & solitude of the Wolds caused by visitor pressure especially to honey-pot villages.

#### Opportunities:

- Need for improved and well managed range of accommodation & visitor attractions appropriate to the Wolds AONB.
- Scope to further develop the green tourism product.
- Ongoing innovation of the Lincolnshire Wolds Walking Festival.

The Authority's Economic Development are supportive of the above application from a visitor economy perspective.

#### **Conclusion and reasons for decision:**

Planning law requires that planning applications are determined against the provisions of the development plan, unless there are any material considerations which would indicate otherwise.

The application proposes holiday accommodation within the Lincolnshire Wolds AONB. Situated between the existing built up area and the Kingsmead Residential Park, it is considered that the development would accord with policy LP7 which is generally supportive of "high quality sustainable visitor facilities".

The development would not be expected to adversely impact upon the setting of surrounding heritage assets (above or below ground) and would accord with policy LP25 in this respect.

The site is located within the Lincolnshire Wolds AONB. The NPPF requires that *“Great weight should be given to conserving landscape and scenic beauty in... Areas of Outstanding Natural Beauty”*.

Having considered the Landscape Visual Assessment, in view of the site’s location between the built-up area and existing residential park, the low density nature of the development, it is considered that the development would only have a limited impact on the scenic beauty of the AONB and that this would be further ameliorated by the strong landscaping scheme maturing over time. The development is considered to be compliant with policy LP17 of the CLLP.

The NPPF further states that “Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest.”

It is considered that, in view of the limited impact on the character and scenic beauty of the AONB, and the significant tourism and local economy benefits that would arise, that the development is within the public interest and exceptional circumstances can be justified.

It is not expected to have a significant adverse impact on the living conditions of neighbouring residential uses, highway safety, drainage or cause any further flooding

The decision has been considered against LP1 A Presumption in Favour of Sustainable Development, LP2 The Spatial Strategy and Settlement Hierarchy, LP5 Delivering Prosperity and Jobs, LP7 A Sustainable Visitor Economy, LP13 Accessibility and Transport, LP14 Managing Water Resources and Flood Risk, LP17 Landscape, Townscape and Views, LP21 Biodiversity and Geodiversity, LP25 The Historic Environment, LP26 Design and Amenity and LP55 Development in the Countryside of the Central Lincolnshire Local plan 2012-2036 and guidance contained within the National Planning Policy Framework and National Planning Practice Guidance. Furthermore consideration has been given to the Lincolnshire Wolds AONB Management Plan (2013-18) and the duty set out in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990. In light of the above assessment, it is considered that the proposal is acceptable subject to certain conditions. The proposal will provide visitor accommodation in an appropriate location in an Area of Outstanding Natural Beauty. The proposal will not have a significant adverse visual impact on the site, the open countryside or the Area of Outstanding Natural Beauty. It will not have a significant adverse impact on the living conditions of neighbouring residential uses, highway safety, archaeology or harm the setting of nearby Listed Buildings or Scheduled Ancient Monuments. Therefore the proposal conforms to local policy LP5, LP7, LP13, LP17, LP21, LP25, LP26 and LP55 of the Central Lincolnshire Local Plan and the provisions of the National Planning Policy Framework.

### **Human Rights Implications:**

The above objections, considerations and resulting recommendation have had regard to Article 8 and Article 1 of the First Protocol of the European Convention for Human Rights Act 1998. The recommendation will not interfere with the applicant's and/or objector's right to respect for his private and family life, his home and his correspondence.

**Legal Implications:**

Although all planning decisions have the ability to be legally challenged it is considered there are no specific legal implications arising from this report

**RECOMMENDATION: Grant Permission subject to 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 development shall take place until all caravan designs including the colour and position on the site has been submitted and agreed in writing by the Local Planning Authority. The approved designs and position shall be retained thereafter.

Reason: To ensure the use of appropriate materials in the interests of visual amenity and the character and appearance of the site, the open countryside and the AONB to accord with the National Planning Policy Framework and local policies LP17 and LP26 of the Central Lincolnshire Local Plan 2012-2036.

3. No development shall take place until a comprehensive landscaping scheme has been submitted and agreed in writing by the Local Planning Authority. The landscaping shall identify or include:

- all retained trees and hedgerows.
- all proposed plants, trees and hedgerows.
- a planting scheme including species, position, height and planting formation of all new plants, trees and hedgerows. In addition ground/planting pit preparation, details of tree support and protection, and aftercare for 5 years.
- Materials used to construct the onsite road, parking spaces and pitches.
- The type and position of at least 1 bat roost and 3 bat boxes.
- The type and position of four bird boxes.
- Identify location of SuDS pond with section plan showing gently sloping margins and details of native aquatic/marginal planting.
- Lighting scheme including design, position, height, lighting intensity and direction.

Reason: To ensure that appropriate landscaping is introduced so that it will not adversely impact on the character and appearance of the site and enhance the ecological value of the site to accord with the National Planning Policy Framework and local policies LP17, LP21 and LP26 of the Central Lincolnshire Local Plan 2012-2036.

4. No development shall take place until a construction and implementation method statement has been submitted and agreed in writing by the local planning authority. The approved statement shall be adhered to throughout the construction period. The statement shall provide for:
  - (i) the routing and management of traffic;
  - (ii) the parking of vehicles of site operatives and visitors;
  - (iii) loading and unloading of plant and materials;
  - (iv) storage of plant and materials used in constructing the development;
  - (v) the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
  - (vi) wheel cleaning facilities;
  - (vii) measures to control the emission of dust and dirt;
  - (viii) protection of existing trees and hedging;
  - (ix) protection of potential fauna activity;
  - (x) details of noise reduction measures;
  - (xi) a scheme for recycling/disposing of waste;
  - (xii) the hours during which machinery may be operated, vehicles may enter and leave, and works may be carried out on the site.

Reason: To minimise disruption to the living conditions of the neighbouring dwelling and surrounding area from noise, dust and vibration and to protect biodiversity to accord with the National Planning Policy Framework and local policy LP21 and LP26 of the Central Lincolnshire Local Plan 2012-2036.

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

5. With the exception of the detailed matters referred to by the conditions of this consent, the development hereby approved shall be carried out in accordance with the following drawing: Site Plan 804.02/02B dated July 2017 and Access Strategy Plan dated 29<sup>th</sup> September 2016. The works shall be carried out in accordance with the details shown on the approved plans and in any other approved documents forming part of the application.

Reason: To ensure the development proceeds in accordance with the approved plans and to accord with the National Planning Policy Framework and local policies LP17, LP21 and LP26 of the Central Lincolnshire Local Plan 2012-2036.

6. Prior to operation of the site the foul and surface drainage methods shall be completed in accordance with the scheme set out in drainage strategy report dated December 2016 published by GA Grimley Limited and drainage strategy layout

plan in appendix v. The proposed scheme shall be maintained and retained thereafter.

Reason: To avoid flooding and prevent pollution of the water environment as recommended by the Environment Agency to accord with the National Planning Policy Framework and local policy LP14 of the Central Lincolnshire Local Plan 2012-2036.

7. Before the access is brought into use the land between the highway boundary and the vision splays indicated on drawing number G08167/15/002 Rev B dated 29/9/16 shall be lowered so that it does not exceed 1.0 metres above the level of the adjacent carriageway Swinhope Road and thereafter the visibility splay shall be kept free of obstacles exceeding 1.0 metres in height.

Reason: In the interests of safety of the users of the public highway and the safety of the users of the site to accord with the National Planning Policy Framework and local policy LP13 of the Central Lincolnshire Local Plan 2012-2036.

8. The vehicular access shall incorporate 6 metres radii tangential to the nearside edge of the carriageway of Swinhope Road and the minimum width of the access shall be 5 metres.

Reason: In the interests of safety of the users of the public highway and the safety of the users of the site to accord with the National Planning Policy Framework and local policy LP13 of the Central Lincolnshire Local Plan 2012-2036.

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

9. The 35 holiday caravans hereby permitted 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 on the site, and of their main home addresses, and shall make this information available at all reasonable times to the Local Planning Authority.

Reason: The site is located within the open countryside where permanent residential accommodation would not normally be permitted to accord with the National Planning Policy Framework local policy LP55 of the Central Lincolnshire Local Plan 2012-2036.

10. The single caravan permitted in the east corner of the site shall only be used for office/reception purposes in connection with the holiday caravan park business.

Reason: To ensure the office/reception caravan is only used in connection with the operation of the holiday caravan park to accord with the National Planning Policy Framework local policy LP55 of the Central Lincolnshire Local Plan 2012-2036.

**Informatives**



### Highways

Prior to the submission of details for any access works within the public highway you must contact the Divisional Highways Manager on 01522 782070 for application, specification and construction information.

### Trees Planting

Some of the proposed trees are quite close to some of the proposed caravans along the southern edge of the site. It is advised that the comprehensive landscaping plan considers the position of these trees and the impact they may have on the amenity of the holiday makers through shading.

### Caravan design and appearance

It is advised and recommended that the caravan roofs are a sensitive and appropriate green colour when considering condition 2 set out above.