

## **Officers Report**

### **Planning Application No: 138145**

**PROPOSAL:** Planning application for change of use of land for the siting of 84no. chalet lodge units, with 3no. additional lodges for use as site manager's accommodation, multi functional space and a reception-manager's office.

**LOCATION:** Holywell Grange Moor Road Snitterby Gainsborough DN21 4UH

**WARD:** Waddingham and Spital

**WARD MEMBER(S):** Cllr J. Summers

**APPLICANT NAME:** Mr Stewart Smith

**TARGET DECISION DATE:** 07/11/2018 EOT 17/12/2018

**DEVELOPMENT TYPE:** Major - Other

**CASE OFFICER:** George Backovic

**RECOMMENDED DECISION:** Refuse Planning Permission

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**Description:** Holywell Grange is a Grade II Listed former farmhouse with a three-bay frontage facing south towards Moor Road. The house is set well back from the road with large gardens to the front and rear. It is located to the east of Snitterby in the open countryside approximately 1.1 km from the junction of Moor Road with School Lane and 1.4 km from the High Street junction. The application site comprises two large fields surrounding the house and its gardens to the north, east and west. The fields are described within the Landscape and Visual Impact Assessment accompanying the application as the 'west field' and 'east field', with the dividing line between them being a boundary that runs north from the western side of the domestic garden. Small blocks of plantation woodland or tree groups are also located within each field next to the boundary of the domestic garden. A large pond has been created within the southern end of the western field circled by trees and other vegetation. Total area of the site is approximately 9.4 hectares.

**Proposal:** This is a planning application for a change of use of land to site 84 "chalet lodges" with 3 additional lodges to be used as a site manager's accommodation, multi-functional space and a reception/manager's office. The scheme is anticipated to be developed over a period of 4 to 5 years and in four phases. The initial phase will create the infrastructure (internal roads, sewage treatment plant and associated drainage, electricity gas and water supplies of which construction will last six months. In addition, Phase 1 includes the creation of a new footway linking the site to Snitterby. Phases 2 and 3 will create around 26 and 34 lodges each during an 18-month period. The remaining 24 lodges will be provided in Phase 4 during the subsequent 12-month period.

The following documents were submitted in support of the application:

- Sustainability Assessment
- Sustainable Tourism Plan
- Sustainability Policy
- Transport Statement
- Flood Risk Assessment
- Landscape and Visual Impact Assessment
- Landscape and Ecological Management Plan
- Heritage Impact Assessment
- Noise Assessment
- 4 letters of support
- A Financial Viability and Tourism Market Assessment (Marked Private and Confidential)
- A letter from Hawdon's Coaches and Vintage Vehicle Hire Ltd dated 9<sup>th</sup> October 2016 confirming interest in providing vintage bus travel for residents staying at the site.
- An allowed appeal decision dated 24<sup>th</sup> April 2014 following a refusal of planning permission by North Lincolnshire Council ( PA/2013/0578 ) for a change of use of land for the development of a 30 unit sustainable tourism exemplar Leisure lodge park at Land at Redbourne Mere, Kirton in Lindsey (Ref: APP/Y2003/A/13/2209104)
- Planning Statement
- Floor plans and elevations of lodges

**Relevant history:** There is no planning history on the area where the cabins are proposed. The most recent application was in 2003 and this related to Hollywell Grange itself (Ref: M03/P/0138). Permission was granted on 31<sup>st</sup> July 2003 for "regeneration of existing and previously demolished barns to provide holiday lets and new garage and sheds"

**Representations:**

**Chairman/Ward member(s):** No comments received.

**Snitterby Parish Council (Summary):** Strongly and unanimously objects to the above planning application because it fails to comply with the Central Lincolnshire Local Plan as follows:-

- Policy objectives 2.5.1 - To protect and enhance the rich diversity of the character of Central Lincolnshire's landscape and townscape, maintaining and strengthening local distinctiveness and sense of place. The application does nothing to enhance or strengthen in any way the local distinctiveness of the location. Massing lodges on this site will be an intrusion and obstruction to the natural vista. The location does not qualify as appropriate it does not retain the core shape and form of the settlement, it would significantly harm the settlement's character and appearance and it would harm the character and appearance of the surrounding countryside and the rural setting of the settlement
- LP55 Part C: Mobile homes within the countryside will be considered in the same way as applications for permanent dwellings LP55 Part D:

New dwellings in the countryside states that new dwellings will only be acceptable where they are essential to rural operations.

- Snitterby is a small village. Snitterby Parish Council has decided not to carry out a neighbourhood plan and no evidence of clear local community support was submitted with the application, as required. The Parish Council is aware that there is no such support. Furthermore this application is not for a small scale development.
- LP4 establishes a 10% level of growth for Snitterby This application would exceed the permitted level of growth. Indeed at full occupancy the scheme would more than double the occupancy of Snitterby.
- LP 7 The development will contribute very little to the local economy. There is no shop or post office in Snitterby and the inclusion of a shop on site will do nothing to benefit other shops in the area, including the shop/post office in Waddingham. Employment possibilities will be minimal. On site services- photographer, chiropractor, therapist and other healthcare practitioners – will be provided by businesses from outside the locality. The local economic benefit claimed in the application is based on a theoretical formula, no realistic research on the locality having been carried out. The development will only benefit the applicant and visitors and not the local community.
- Strain placed on already stretched medical resources will be to the detriment of the local community. The development does not respect the intrinsic and natural built environmental qualities of the area. The development is not appropriate for the character of the local environment in scale and nature. The development is not located within an existing settlement. The development does not relate to an existing visitor facility which is seeking redevelopment extension.
- Planning application M03/P/0138: This application which included the restoration and a conversion of an old barn to holiday lettings was approved in 2003 subject to time limitations. Since work on this part of the application was never completed, consent expired by 2011 at the latest. One is also left wondering, if the perceived tourism demand is as outlined, why the approval was not developed
- Hayes Farmhouse [now Holywell Grange] is a Grade II Listed Building. The application gives no consideration of the significance of the Listed Building's significance and the contribution made by its setting, as required by the NPPF. The Planning [Listed Buildings & Conservation Areas] Act 1990 places a legal requirement on local planning authorities to have "special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses". A watercourse, Black Dike, runs along the western boundary of the site. Black Dike is stated to be a Site of Nature Conservation Importance and the discharge of "treated" foul water into

it could have a detrimental effect on the character and nature of the flora and fauna. Concerns have also been raised about the resulting odour.

- Moor Road properties and the fields to the west have flooded several times in recent memory, the summer of 2007 being the worst. The situation will be made worse by the construction of roads, car parking and other hard standing which will increase the speed of flow into Black Dike.
- The obvious route to the site for construction traffic and visitors is via the A15, then Cliff Road and Moor Road. Cliff Road is a single track road and Moor Road is single track in places. These roads are also used as a rat run by heavy goods vehicles as it is the shortest route to and from the A15 for vehicles from the east of Snitterby. These can be dangerous roads as the fatal accident on Moor Road in 2015 proves.
- There is not a network of rights of way and footpaths around Waddingham and Snitterby. Most rights of way were ploughed during WWII and after consultation were deleted from the Right of Way map.
- Moor Road is unsafe for cyclists, especially for children, because of blind bends and speeding motorists. Cycling on the very busy A15 and A631 would be very dangerous and should not be recommended.
- The usefulness of railway services is exaggerated. There are services from Brigg and Kirton in Lindsey stations on Saturdays only. Problems with services from Market Rasen have been well documented in the Market Rasen Mail.
- What evidence is there that this affluent niche clientele will choose to travel by mini-bus or vintage coach rather in their own presumably up-market cars? The usefulness of bus services is exaggerated and in many examples the suggested routes to places to visit are impractical and ludicrous. Who is going to take over 3 hours, and in some cases over 4 hours, to reach a destination that is only 30 minutes away by car? The main purpose of Call Connect is to provide transport services to those villages which have no services or inadequate services. It is not meant to be a taxi service for tourists. Use by tourists would reduce availability for residents who need it for essential journeys to and from hospitals, surgeries and colleges.
- Across the road from the site on Moor Road and the unclassified road [Rasen Road] an existing outdoor pig business is operated. The closeness of the occupants of 84 lodges including children and dogs could affect the health and wellbeing, safety and security of the livestock. In general we feel this scheme is incompatible with neighbouring arable and livestock farming.

- Appendix A - This appeal is irrelevant as an application for 30 homes in Kirton in Lindsey, ten times larger than Snitterby and in a different county, should not be compared to the 84 in this application.
- 4 letters of support – These should be ignored as they are largely from businesses outside the locality hoping to make financial gain from this application.
- The applicant does not indicate whether he will maintain control of the business or whether it will be sold on. If individual lodges are to be sold to private buyers, there is no information given regarding length of occupancy or what would be the months of non-occupancy, a requirement for holiday homes under private ownership. Given the questionable viability of the scheme there is concern as to future development/change of use/variation should the project fail financially.
- Whether lodges are sold or let, whether phased in or not, the end result is 84 lodges in a location unsuitable for the nature of the proposal, a proposal that is inappropriate for the character of the local environment in scale and nature and which will give no overriding benefit to the local economy and community. This is an ill thought out plan full of fine words, promises and claims but of no substance.
- The applicant has provided no evidence that such a niche clientele would wish to spend time in a field in Snitterby with no facilities, no useful public transport, no close tourist attractions and no local events of interest. Surely such a niche affluent clientele would prefer their home comforts.
- If all lodges are to be privately owned, will there be a condition on purchase that will exclude letting? If not, who will vet the private owners' clientele?
- The agent acknowledges that the long term local benefits are difficult to quantify [i.e. no idea], despite other claims that there would be an annual local benefit of £380000.
- There is no evidence that local residents would wish to sell services or products to the site. To date all comments received by WLDC from Snitterby residents have been against the application and at a parish council meeting held on August 30<sup>th</sup> attended by over 50 people no Snitterby resident spoke to support the application.
- Where is the evidence that this aging, sedentary clientele will wish to cycle?

- Supermarket deliveries: If the onsite shop is to supply only basic items, then lodge occupants will need to travel to supermarkets for further items. It is not credible that villagers would use this shop.
- Planning for multifunctional area: It is not credible that villagers would use any of the onsite services.
- Strategic tourism view: This would appear to be a desperate attempt by the agent to obtain last minute support from tourism organisations. Perhaps a consultation response should also be sought from the National Pig Association, the Campaign to Protect Rural England and other farming and countryside organisations.

### **Waddingham Parish Council (Summary):**

- Waddingham Parish Council's response on behalf of the residents (see context) is that this application should be refused based on our understanding of our resident's views, concerns and extensive knowledge of the local area. We have set these out in the context of the material considerations that apply to a planning application of this nature as defined by WLDC Planning Department.
- We are not convinced by the sustainability claims by the applicant and considering it is a 100 page document which contains a significant disclaimer to its accuracy at its outset. This application has raised significant opposition within Waddingham Village (as well as Snitterby) In view of this we would like to request that this planning Application is determined at a full Planning Committee meeting and not delegated.
- Adequacy of Parking, loading and turning: Transport Statement and travel plan states 'the parking spaces at the reception building are generally just for checking in/out. Within the site, 1 parking space will be provided for each lodge'. This statement does not take into account visitors, family or service providers. TRICS data is typically based on averages and requires parameters to be inserted into the modelling function.
- We do not regard the assessment of a "relatively low impact" to be correct for our rural village scenario. The consequences of these statements mean that there will be an increase in volume of traffic through the centre of Waddingham village.
- Any route management proposals should direct traffic along the A631 and north up the Rasen Road for construction and other large vehicle movements. Further to the above the junction of the B1205 with the A15 has proved to be difficult to safely navigate. A number of accidents occur along this stretch because of road narrows with soft verges.

- Effect on listed building and conservation area: We understand there is an outstanding heritage assessment related to the listed building Holywell Grange. Our observation is that this development will completely encircle the existing setting of Holywell Grange. We consider that the development of the Holiday Lodge site will effectively destroy part of the character of Holywell Grange.
- Contrary to LP7: This development is located well outside the settlement footprint (as defined in LP4) and therefore located in the countryside. We do not consider that the applicant has demonstrated substantial benefits to justify locating the development in this remote corner of the parish.
- We do not consider the applicant has demonstrated clearly how the development will significantly contribute to the local economy of Waddingham. The letters of support provided by the applicant clearly show that the businesses represented are actually located in Scunthorpe over 11 miles away.
- Contrary to Policy LP 55
- Contrary to Policy LP2 which classes Waddingham as a medium size village and sets out the requirements for development in Medium Villages.
- No demonstration of local community support.
- Doubling the effective population within the parish especially with the stated target visitors who are silver haired and seeking rest and recuperation along with attendant carers will almost inevitably mean extra demand on local GP healthcare services.
- We are aware that in other places these sorts of sites often develop into permanent full time places of residence (where close season regulations are often blatantly ignored) and where there is no recognition of these “mobile” type dwellings requiring to be assessed for Council Tax.
- Implications of Appeal Decision, Kirton Lindsey. The applicant is claiming that the material weight of this application should figure highly in the determination of this application. We consider that this application was in a different county with its own planning policies, was for a site of only 30 units, and was if not within, directly adjacent to within the settlement of Kirton Lindsey (classified as a town). The Holywell Grange application is for 84+ units and is sited in the countryside.

- Black Dike is a Site of Nature Conservation Importance (as recognised in the applicant's Landscape and Visual Assessments). We also note that the Environment agency response whilst raising no objection to the development as submitted does advise the Local Planning Authority to consider the hierarchy of foul drainage.. We also note that the granting of planning permission does not guarantee the granting of an environmental permit. Black Dike is fundamentally part of a land drainage system, not a free-flowing water course and it's level is very much affected by seasonal conditions and ranges from virtually dry to conditions of flooding onto adjoining land.
- Flood risk: We note that there is no indication of provision for surface water drainage in the plans. Increased run off from the site due to hard standings etc. could increase the flow of surface water into Black Dike and increase the risk of flooding. We strenuously oppose any development that could potentially increase the risk of flooding in the Waddingham Parish and affect other developments in the village.
- Given the time available to comment we do not consider we have enough time to fully analyse or challenge the claims in a 100 page document especially which at the outset carries such a disclaimer to its contents. Our response to the above is that we agree with the author's statement and regard the Sustainability Assessment Document not to carry enough material consideration/weight in determining the application. Our brief analysis observation would indicate that this is at best educated guesswork or a planning compliance tick box exercise.

### **Local residents**

Objections received from West View, Snitterby; Brickyard Farm, Rasen Road, Waddingham; 4 Dovecote Close Snitterby; Ivon House, Moor Road, Snitterby x 3; 1 Redbourne Rd Waddingham; Moor Farm Snitterby; Black Beck Cottage, Snitterby; The Cottage, School Lane, Snitterby; Riverside Lodge, Snitterby; Jusara, Church Lane, Snitterby; 12 Dovecote Close, Snitterby; 1 New House, School Lane, Snitterby; 1, Chapel Lane, Snitterby; Landrace House Rasen Road Waddingham Sandhayes; 12 Dovecote Close, Snitterby; Wharfedale, Cliff Road; Snitterby; Sundial House, Cliff Road, Snitterby; Moor Stables, The Moor Snitterby; 10 Dovecote Close, Snitterby; Greenacres Atterby Carr Lane, Atterby Car; Bramley End, Moor Road, Snitterby; 2 Dovecote Close Snitterby; Pinfold House ,Snitterby; Top House, Cliff Road; Brookside Waddingham Road, Snitterby; 8 Dovecote Close, Snitterby; 3 Church Lane, Snitterby; Hayes Cottage, Rasen Road; Ballinure, High Street Snitterby; Acorn Farmhouse, Moor Road, Snitterby; Willow Brook House, High Street, Snitterby; The Bungalow, Rasen Road, Snitterby Sandhayes; High Rise Cottage, High Street, Snitterby; 6 Dovecote Close, Snitterby; Poplar Lodge, Snitterby; Paradise Farm, Waddingham; West View, Snitterby; Sand Hayes Farm, Snitterby; Tanderholmes Farm, Atterby Carr Lane; Greenacres. Atterby Carr Lane; Floral Cottage High Street, Snitterby; The Cottage, Moor Road, Snitterby; South View, Moor Road, Snitterby; Priory Farm, Southmoor Lane, Snitterby; Lee Cottage, School Lane; Barrett's Barn, Bridge Farm, Snitterby Carr; Linwold Snitterby Road, Waddingham; 13 Cliff Crescent,



Waddingham; Pinfold House, Snitterby; Homeleigh, Moor Road, Snitterby; Brookside, Waddingham Road, Snitterby; 2 The Wolds, Snitterby Road, Waddingham; Magpies, Church Road, Waddingham;

### **Summary of grounds of objection:**

- **Poor Accessibility with very limited facilities:** The proposed site is not on a main bus or train route – the nearest main train stations being 17 or so miles away in either Lincoln (17.8 miles) or Scunthorpe (17.7 miles). The bus routes to Waddingham and Snitterby are incredibly limited, running once a week. There is no path to walk into Waddingham, or into Snitterby, with locals having to travel by car to any location. The proposed site is located just over a mile from Snitterby, a very rural village, with no amenities, shops, school or GP surgery. A local public house is situated there, but is not open every day, nor does it offer a menu of food on a regular basis. Waddingham, located just over 1 ½ miles away, has a small village shop that has limited opening times. There is a village hall and a primary school, but the local pub has since closed. Both are very quiet villages, and are inhabited with residents who wish to live a quiet rural existence.
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- **Highway Safety Risks:** Fatal accident occurred on Moor road in 2015. Big increase in traffic. Danger to cyclists. These are exceptionally busy rural lanes, which are predominantly single track roads (and commuter ‘rat-runs’) between the A15 through to Caistor and surrounding villages. One of the primary access routes to the site will be from the A15 and along this route. The road proposed as the main access to the development is a busy 60mph road, with no street lighting or footpath to Waddingham. Agricultural Machinery is getting bigger and faster and speeding Traffic is an existing problem. Limited parking provision will lead to on street parking. Will impede existing farm operations by way of increased traffic.
- **Planting of trees, hedges and shrubs would not reduce the visibility of the park and would take 15 years to mature**
- **The park will not provide tranquillity and quiet relaxation as it is located next to a 60mph road.**
- **It is suggested that visitors could use the shop on site to provide “essential” items. There is no need for this. Residents have the use of “Uncle Henry’s”, a farm shop located 3 ½ miles away or “The Willows” located approximately 5 miles away. There is no need or requirement to have a further style shop within such a small radius, and would also impact on existing businesses.**
- **What safety assurances can be provided that children and families will be safely contained within the site, ensuring no children or adults who**

lack capacity or awareness of their surroundings, would not “run/escape” onto the road, or into neighbour’s dwellings?

- Increased Litter and dog mess.
- Busy Farming Periods clashing with the Peak Tourism times.
- Increased Maintenance Costs: Damage to grass verges in wet weather and increased pot holes in passing points
- Construction Timescales - If planning is granted, the proposal for a 4-5 year phased approach to development means a prolonged period of disruption to local residents, causing further stress and disruption.
- Increased pollution is inevitable from the increased visitor numbers and traffic. This will have a have a negative impact on the local eco-system.
- Protection of wildlife and habitats need to be considered and not just in the immediate development area, but the surrounding countryside.
- Flooding and Drainage - The planning application states that the site is not affected by flooding. However, there is no mention of water that drains downhill to neighbouring properties and land and has flooded them and could flood them again.
- Questionable Business Plan in an uncertain economic climate: to support tourism and local community. We question the true value to the local tourist economy, as the business motives for this development seems to heavily focus on maximising the volume of holiday lodges to sell and rent, rather than the visitor experience on site. Economic climate – an uncertain property market and a downturn in consumer spending on leisure activities.
- There are already holiday parks within the local vicinity of Snitterby, and closer to the coast line and local tourist attractions in Lincoln, Hull, Barton, Caistor, etc., which are well established parks, and are also hidden by dense trees/within woods etc., or are not within the location of existing residents. There is a large volume of holiday lodges for sale or to rent in Lincolnshire, all in rural locations and within the catchment area of the highlighted tourist attractions noted in this application. Thorpe Park Holiday Lodges just outside Lincoln is a picturesque development off the A46, with 30 plots and has a good choice of lodges for sale from £150,000 up to £210,000 for a 4 bedroom chalet, with the added bonus of a strong public transport and close proximity to the City of Lincoln.
- Other attempts by locals to set up a B&B or holiday home businesses have proven difficult for people to sustain with owners selling up or where they can’t sell them renting them on long term rental contracts.

- The Applicant suggests that self-catered holidays are supported in the countryside and villages. However, he has not set out why the location of the site specifically at Waddingham/Snitterby can be substantiated.
- Who will guarantee the safety and well-being of the existing farm animals already in existence, and that no trespassing of the holiday makers onto private land takes place, including littering and feeding of such animals, which would be detrimental to their health, and would, in the case of our pig unit, raise potential health and safety issues, and increase stress to our livestock, and again, raise animal welfare issues.
- It is suggested that the development will also promote health and well-being. There is nothing identified that sets out this proposed development, over and above that from any other existing caravan/lodge sites in the area.
- Letters in Support from Local Businesses: The Applicant seeks to support his Application by relying upon 4 letters from “local” businesses. However, we do not see how the building of the proposed site can assist any of the 4 businesses to any significant degree, or at all.
- Utilisation of Appeal Granted for 30 unit Leisure Park in Kirton Lindsey: The use of the appeal decision for the above site in Kirton Lindsey is not a valid comparison.
- Whilst Lincolnshire Police have written a letter advising that they do not object to the proposed Application, who will provide assurances and undertakings that no increase in crime rates will be seen with this site and its visitors. .
- No amount of trees would take away the impact of such a large number of lodges to the rural countryside.
- This is a rural farming community – not a tourist destination. On agricultural land and should be used for food production not a development with more residents than Snitterby
- Close knit community will be harmed by influx of temporary residents
- Impact on existing ill health; I have end stage renal failure and do not relish spending the remaining years of my life living next to a building site / holiday park
- The chalets will not contribute to local affordable housing
- Holywell Grange 'will encourage partnership with local groups and schools to develop initiatives for biodiversity enhancement within the

area'. Do they have letters of support from the local schools and groups? Also stated in the policy 'We will encourage people to record species within the Kirton park office'. More travel by car? Where is Kirton Park?

- Light pollution Snitterby has dark skies, envied by many visitors to the area, lighting needed on the proposed development for safety and security, would create an unacceptable pool of light that would be seen for miles.
- Real danger, as has happened elsewhere, that any holiday lodge approach is a precursor to something even more impactful over time, such as residential lodges or full-time accommodation for the over 55's.
- Nothing for local employment (a couple of part-time jobs at best), and nothing for the area. It's not as if there are any shops who would welcome the extra custom in this region

**LCC Highways:** The applicant has addressed all potential highway safety concerns within the submission with appropriate mitigation measures. I will be looking to condition the proposed footway, Construction Management Plan and Travel Plan measures in my final response.

I have received the FRA for this site and am satisfied that they have considered surface water flooding and have proposed suitable mitigation methods.

**Public Protection:** There is potential for multiple aspects of noise nuisance arising from this proposed leisure park. Accordingly I would recommend the need for a noise report to identify all potential impacts and mitigate accordingly. The noise report ought to be supplemented by a management plan and consider it in its findings and recommendations.

Following submission of report: No surprises in this report. A reasonably selected comparison site.

Recommendation: A robust management plan ought to be required by condition if permission is to be granted.

**Growth and Projects (Visitor Economy) Team:** In principle, and subject to normal planning considerations, the Growth and Projects Team (including Visitor Economy) are supportive of the above application from a visitor economy perspective. After recently reviewing the documents submitted we feel the information enclosed is appropriate in nature and is in line with current tourism strategies. Tourism is a major sector in West Lindsey bringing into the area around £126.5 million in revenue and supporting c1707 full time jobs (STEAM data 2017). Staying visitors account for 27% of all visitors to the district and is currently worth £44.76 million (STEAM data 2017) which, has grown annually since 2012.

The provision of quality accommodation 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 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.

It should also be noted that due to the nature of the location and the limited services available in the area, we feel that this site would be best situated near a larger settlement such as Caistor in order to be able to manage visitor demand. We also do have some reservations over the local nature of some of the proposed excursions as detailed in the Sustainable Tourism Plan (page 4-5) which include Men's Breakfasts and Tea Dances. We feel these activities would not appeal to visitors travelling from outside of the county.

In this application it is important to acknowledge that bringing more visitors into the district, who will use all the services available, will undoubtedly aid the economy of the district for local businesses and residents.

**Environment Agency: No objections** to the proposed development, as submitted.

**Natural England:** Natural England has no comments to make on this application. Natural England has not assessed this application for impacts on protected species. Natural England has published Standing Advice which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice. Natural England and the Forestry Commission have also published standing advice on ancient woodland and veteran trees which you can use to assess any impacts on ancient woodland.

**Conservation Officer (Summary):** Holywell Grange according to the list description a late 18th C century farmhouse constructed of roughly coursed limestone and contrasting red brick quoin and window dressings. This small farmhouse represents a typical interpretation of national architectural style of the 18th century, which was so popular that it worked its way down the social order to even the smallest of houses. My site visit today confirms the west elevation was also a principal elevation. This elevation is of high significance, and its setting and how it is experienced is also of high significance.

Section 66 of the LB&CA Act 1990, requires the LPA to have 'special regard' for the preservation of a listed building and its setting. This proposal fails to preserve (leave as is) the setting of Holywell Grange. The proposal also fails to meet criterion d. and e. of the adopted CLLP 2017 Policy LP25. Unfortunately, the only recommendation I can offer in terms of this development is that of Refusal. As per discussions about Holywell and levels of harm. I would have identified substantial harm in my comments if the proposed scheme was such that it constituted harm. If you are minded to approve I would advise that over and above policy full consideration should be given to the requirement in law (which is clearly above policy in terms of hierarchy, being a legal requirement) to 'have special regard' to the desirability of preserving that setting, and under paragraph 190 of the NPPF,

that minimising harm in this case, would be restricting any permission granted to ensure that the field to the west of Holywell Grange should not be developed with numerous holiday cabins.

**Tree and Landscape Officer (Summary):**

I have objections to the proposals due to the close proximity of many of the chalets to the boundary hedges along Rasen Road and Moor Road, and the negative visual impact they would have along the street scene. The existing trees and hedgerows are not substantial enough to provide adequate screening to sufficiently minimise its visual impact to the surrounding area. I would have no objections if the chalets were positioned a greater distance from the site boundaries and there was sufficient space for substantial landscape planting for screening and to minimise visual impact and intrusion into the surrounding landscape and character of the area, and for new planting to have sufficient space to grow with minimum impact to nearby chalets.

**Lincolnshire Police:** No objections to this application.

**Relevant Planning Policies:**

Planning law<sup>1</sup> requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The Development Plan in this location comprises the Central Lincolnshire Local Plan (April 2017) and the Lincolnshire Minerals and Waste Local Plan (2017).

**Central Lincolnshire Local Plan (CLLP)<sup>2</sup>**

The CLLP was adopted in April 2017 and forms the Development Plan covering the whole district (and other Central Lincolnshire Authorities). The following policies are considered most relevant in consideration of the application:

- Policy LP1: A Presumption in Favour of Sustainable Development
- Policy LP2: The Spatial Strategy and Settlement Hierarchy
- Policy LP3: Level and Distribution of Growth
- Policy LP4: Growth in Villages
- Policy LP7: A Sustainable Visitor Economy
- Policy LP13: Accessibility and Transport
- Policy LP14: Managing Water Resources and Flood Risk
- Policy LP17: Landscape, Townscape and Views
- Policy LP18: Climate Change and Low Carbon Living
- Policy LP21: Biodiversity and Geodiversity
- Policy LP26: Design and Amenity
- Policy LP55: Development in the Countryside

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<sup>1</sup> [Section 38\(6\)](#) of the Planning and Compulsory Purchase Act 2004 and [section 70\(2\)](#) of the Town and Country Planning Act 1990

<sup>2</sup> Available at <https://www.n-kesteven.gov.uk/central-lincolnshire/local-plan/>

## **Lincolnshire Minerals and Waste Local Plan<sup>3</sup>**

The Core Strategy & Development Management policies (CSDMP) were adopted in June 2016 and forms part of the Development Plan. The application site is not within a Mineral Safeguarding Area (MSA).

The Site Locations were adopted in December 2017. The site is not within an allocated Minerals Site or Waste Site/Area.

**Neighbourhood Plan** – The site is not within a designated Neighbourhood Area.

### **National Guidance**

- National Planning Policy Framework 2018 (NPPF)<sup>4</sup>
- Planning Practice Guidance

Legislation - Section 66 of the Listed Buildings & Conservation Areas Act 1990

### **Main issues**

- Principle of Development LP2 LP7 LP55 considering sustainability in locational terms LP13
- Highway Safety LP13
- Impact on character and appearance of the site and wider area LP17 and LP 26
- Impact on Heritage Assets LP25
- Flood risk and drainage LP14
- Biodiversity LP 21
- Increase noise and disturbance LP 26

### **Assessment:**

**Principle:** CLLP policies LP2, LP7, LP13 and LP55

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

*“Unless allowed by:*

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<sup>3</sup> Available at <https://www.lincolnshire.gov.uk/residents/environment-and-planning/planning-and-development/minerals-and-waste/>

<sup>4</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

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 as an 84 lodge holiday accommodation – not permanent residential accommodation. It does however include accommodation for a site manager.

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: 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.***

LP7 is consistent with paragraph 83 of the NPPF (2018) which states that planning policies and decisions should enable:

*“c) sustainable rural tourism and leisure developments which respect the character of the countryside”*

The development is not located within an existing settlement and the applicant’s submission contends that a large holiday lodge park by its very nature requires a rural rather than an urban location. It is also argued that due to partial implementation of the 2003 permission that it is an existing visitor facility seeking redevelopment or expansion.

There is merit in the argument that a development of the type proposed requires a rural location. Tourism accommodation at this scale could not readily be accommodated within an existing settlement, and such locations are therefore arguably “unsuitable for the nature of the proposal”.

In terms of the second point simply as a matter of fact this is not an existing visitor facility. It has not been demonstrated that the site has been actively used for tourism, and no evidence of this was noted on site.

In terms of assessment under LP7 whilst each application must be considered on its own merits it is helpful to examine a recently dismissed appeal in relation to the provision of 11 holiday lodges and a workspace building outside an existing settlement, which although at a significantly reduced scale was determined with reference to policies LP2, LP7 and LP55 which are applicable to the current application. (Ref: PP/N2535/W/18/320665 LPA Ref: 136910). Inspector D Guiver considered one of the main issues to be:

” a) *whether the proposal is in an appropriate location with regard to local development plan policies*”<sup>5</sup>

He recognised that tourism made a major contribution to national and local economies, and that there was evidence of growth in tourism leading to increased demand for accommodation in Lincolnshire. He also found that,

*“the evidence before me does not demonstrate a specific need for accommodation in the location of the appeal site”*<sup>6</sup> (officer underlining)  
The current application purports to meet a need for the type of “high end” quality visitor accommodation lacking in northern Lincolnshire whilst not directly making a case for the proposed location. As Inspector Guiver found *“accommodation at the appeal site could provide a base from which tourists could travel to a number of attractions in Lincolnshire, the same would be true of accommodation in any number of other locations.”* This finds an echo in the comments of the “Growth and visitor economy team” which naturally supportive of any development that would increase the number of visitors to the district suggests that it might be more appropriately located closer to a larger settlement with more services and facilities. In terms of facilities at Snitterby this simply comprises a single public house the “Royal Oak” which according to their website is open from 5pm onwards Monday to Friday and from 12pm on Saturdays and Sundays. In Waddingham the nearest village to Snitterby the only facility appears to be a Village Hall and a small village shop with post office. Although a “shop/café” is proposed on the site visits further afield to services and facilities will be required.

It is therefore appropriate to consider available modes of travel to access the wider range of facilities and attractions. It is acknowledged by the revised 2018 NPPF in paragraph 84 that *“sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing*

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<sup>5</sup> Paragraph 5

<sup>6</sup> Paragraph 8

*settlements, and in locations that are not well served by public transport”* whilst also setting out that *“sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”* Policy LP 13 supports proposals which contribute towards an efficient and safe transport network that offers a range of transport choices for the movement of people and goods. All developments should demonstrate, that they have had regard to the requirement for development to be located where travel can be minimised and the use of sustainable transport modes maximised (LP13 (a)).

A Transport Statement and Travel Plan (TP) prepared by BSP Consulting has been submitted with the application which sets out what are claimed as sustainable credentials for the development.

Walking and Cycling: A new footway link is proposed which will span from the site boundary to just west of the junction of Southmoor Lane and Moor Road. This proposed footway will provide a link to Snitterby, which is an improvement and will allow pedestrian access to the Royal Oak. Measured from the eastern section of the site where the majority of log cabins are located this is a distance of approximately 1600 metres and a 20 minute walk. The footpath link will allow access to a number of rights of way. The first is Snit/507/1 which is approximately 900 metres long and runs southwards off Southmoor Lane ending beyond Priory Farm. Snit /69/1 is 2000 metres long to the west of the Royal Oak and ends at the A15.



In terms of access to wider facilities this is of limited benefit. The TP concedes that *“given the type of development the main types of journeys will be employees, which will be very small in number”*. The Sustainable Tourism Plan and Sustainability Policy (STP) submitted with the planning application *“are closely linked to this Travel Plan.”*<sup>7</sup> The STP sets out measures to promote walking which includes employing local people and offering flexible working patterns. Measures to promote walking by visitors and users of the lodge site are identified as:

- *The inclusion of walking route information and details of local walking and Rambler’s events within each lodge and within the main reception of Holywell Grange.*
- *Encouragement of walking events to include Holywell Grange as a starting point*

Reference in the section on walking within the TP is made to the Lindsey Trail. “*The Lindsey Trail, accessible from Willingham Woods in Market Rasen is also a high quality recreational facility for walking. This trail provides people with access to places such as Bleasby, Hainton and South Willingham*”<sup>8</sup> This is, however, located approximately 12.2 miles from Snitterby.

Measures to promote cycling are identified within the STP as:

- *Visitor cycle scheme that provides cycle hire for use whilst staying at Holywell Grange*
- *Employee cycle to work scheme providing incentives for members of staff who chose to travel to Holywell Grange by bicycle.*
- *The inclusion of cycle route information in each lodge and within the main reception of Holywell Grange*

One of the stated benefits of the site for cyclists according to the TP is access to the National Cycle Network in Market Rasen. This is approximately 11.5 miles and a 56 minute bike ride away from the site. This is considered as a limited benefit as it would only be attractive to long distance recreational cyclists rather than leisure cyclists and the benefits would also depend on the proportion of users of the lodges that would engage in such activities. On this basis as part of the overall development the benefit is limited.

Existing public transport provision: There are only two scheduled bus departure and return journeys from Snitterby each week. The 161 Market Rasen to Scunthorpe service via Brigg which departs from the bus stop opposite the Royal Oak on Thursdays at 10.43 and returns at 13.36. The second is the Brigg to Lincoln 9811 service which departs from the bus stop opposite the Royal Oak on Fridays at 09.53 and returns at 13.36.

The maximum walking distance to a bus stop should not exceed 400m and preferably be no more than 300m according to the Institute of Highways and Transportation’s Guidelines for Planning for Public Transport in Developments (IHT 1999). However, although the guidelines recommend the 400m is to be “treated as guidance” the distance from the section of the application site to east of Holywell Grange to the bus stop at the Royal Oak via School Lane is approximately 1600 m with no direct footpath link and upward travel. The application proposes an extension to the existing footpath which is an improvement although the distance and topography remains unchanged.

The Call Connect “demand responsive” service available from Snitterby is the 53M Market Rasen. Registration is required to utilise the service and it must be booked between 1 hour and 1 week in advance. On this basis the weight to be attached to it must be less than that of a regular bus service and the route taken can change depending on the requirements of its passengers. This can have implications for distance travelled but also time taken to reach any particular destination. It is therefore reasonable to conclude that existing

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<sup>8</sup> Page 14 BSP Transport Statement

public transport provision is limited. This is demonstrated by the applicant’s evidence presented in Appendix 1 of the Sustainability Assessment “Public transport routes to local tourist attractions”<sup>9</sup>

Tourist Attraction	Distance	Bus Number(s)	Duration	Directions
Mount Pleasant Windmill	<10km	9811 / 94	1 hr 43 mins	1 min walk to Cliff Road Crossroads, Bus 9811 towards Brigg. Red Lion walk 220 ft Bus 94 towards Kirton in Lindsey. Queens Head walk 0.4 mile to Windmill.
Hemswell Antique Centre	<10km	9811 / 94 / 103	2 hrs 22 mins	1 min walk to Cliff Road Crossroads, Bus 9811 towards Brigg. Red Lion walk 220 ft Bus 94 towards Kirton in Lindsey. Dunstan Hill, walk 85ft Bus 103 towards Lincoln. Off at Post Office and 8 min walk.
RAF Scampton Heritage Centre	<20km	9811 / 94 / 103	3 hrs	Start Royal Oak Inn, Snitterby Bus 9811 to Brigg. Travel to Post Office, Hibaldstow & Bus 94 to Kirton in Lindsey. Millenium Cottages Bus 103 to Lincoln Showground and 21 min walk to RAF Scampton Heritage Centre.
Caistor Arts & Heritage Centre	<20km	9811 / 94 / 103 / 53	4 hrs 19 mins	1 min walk to Cliff Road Crossroads. Bus 9811 towards Brigg. Red Lion walk 220ft Bus 94 towards Kirton in Lindsey to Dunstan Hill. Bus 103 towards Lincoln. Central Bus Station (Bay L) walk to (Bay I) and InterConnect Bus 53 towards Grimsby Butter Market. 2 min walk to Caistor Arts Centre.

The development includes proposals to provide mini-bus transport services to drop-off and pick-up from train stations and tourist destinations.<sup>10</sup> There is however no mechanism to deliver this apart from a reference to partnering with Hawdon’s Coaches. This can therefore be ascribed limited weight. It is noted that this is a rural location and as the NPPF states that to “*meet local business and community needs sites “may have to be found “in locations that are not well served by public transport”*”. The evidence submitted with the application does not demonstrate why an 84 holiday lodge development should be located on the application site discounting potential proximity to larger settlements with more services and facilities.

Reference is within the application to a variety of onsite “themed” activities that could take place on the site with no obligation or delivery mechanism or certainty. This attracts limited weight

<sup>9</sup> Page 84 to 91 Sustainability Assessment

<sup>10</sup> Page 18 BSP Transport Statement

It must be accepted that there is clearly support for the principle of tourism due to the economic benefits that flow from such proposals, including an estimated 5 full time jobs on the site itself and this is afforded positive weight as a material consideration tempered against the choice of location discussed above.

**Highway Safety LP13:**

A 518 metre long footpath from the south eastern corner of the site is proposed to link to the existing footway on Moor Lane providing pedestrian access to Snitterby. This is capable of being secured by use of an appropriately worded condition.

Vehicular access is from the north east corner of the site off Rasen Road, 30 metres to the south of an existing gated access and 240 metres from the junction with Moor Road. A 5.5 metre wide carriageway is proposed leading to a car parking area in front of a proposed reception / sales area. The required visibility splays of 2.4 metres by 215 metres are achievable within the public highway.

Trip generation for the development has been estimated by the use of TRICS data. This estimates that it will generate 6 vehicular trips in the morning peak hour and 19 vehicular trips in the evening peak hour, and a total of 191 vehicular trips per day.

Time Period	Trip Rates (per Unit)		Trip Generation (84 Lodges)		
	In	Out	In	Out	Total
AM (0800-0900)	0.025	0.044	2	4	6
PM (1700-1800)	0.164	0.061	14	5	19
Daily (0700-22:00)	1.281	0.992	108	83	191

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Concerns have been expressed by objectors that this fails to take into account additional trips that might be generated due to visitors, health care providers, service providers and staff amongst others. TRICS is an accepted national standard method of assessing average trip generation with reference to existing similar developments. In this instance the data used is stated to be from “holiday accommodation” and “filtered” to include surveys from “free standing locations”. The number of trips due to the nature of the development will be spread out over the day and is not considered unacceptable. In addition a noise report undertaken at the request of officers to examine potential noise impacts arising from the operation of the site was submitted and no objections were raised by Public Protection subject to a management plan for the site being conditioned. A large number of objections have been

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<sup>11</sup> Page 28 of BSP Transport Statement and Travel Plan

received on the grounds of highway safety with reference to the perceived inadequacy of the existing roads and single width tracks in the area together with potential conflict with agricultural vehicles and other users of the highway. The large number of objections on highway safety grounds is acknowledged by LCC Highways who have confirmed that the potential highway safety concerns have been addressed within the submission with appropriate mitigation measures. Subject to the imposition of conditions no objections are raised to the proposal on the grounds of Highway Safety. No objections have been raised to the level of vehicular parking with a single space per lodge proposed.

**Visual Impact on existing landscape and character LP17 and LP 26:**

Policy LP17 of the Central Lincolnshire Local Plan seeks to protect and enhance the intrinsic value of the 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 inter-visibility between rural historic settlements.

Particular consideration should be given to views of significant buildings and views within landscapes which are more sensitive to change due to their open, exposed nature and extensive inter-visibility from various viewpoints.

The West Lindsey Landscape Character Assessment shows the site falling within the Limestone Dip Slope. Key characteristics include:

- exposed open landscape
- straight roads and trackways, many are ancient enclosure roads with characteristic wide verges backed by hedgerows
- line of small nucleated settlements on slightly elevated land to the east
- individual trees and lines of trees are important landscape features
- historic halls and parkland landscapes

The most sensitive parts of the landscape are:

- narrow winding lanes with abrupt turns and junctions
- hedgerows and wide verges on enclosed roads
- lines of trees and individual specimens

Policy LP26 of the CLLP requires all development to be of a high quality sustainable design that contributes positively to local character, landscape and townscape and supports diversity, equality and access for all.

It notes that development proposals must take into consideration the character and local distinctiveness of the area. This includes seeking to

“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, ... “;

In total 87 lodges are proposed across the site. These are single storey structures with shallow roof pitches. They range in size from 67 sq. metres to 92 sq. metres. They are built in plywood with exterior wood composite cladding and PVCu windows and doors. Such structures which are a reflection of their proposed function can have limited resonance with the local natural and built form. This does not render them unacceptable in their own right as the same charge could be applied to similar tourist accommodation across regionally and nationally. Development by its nature would change the character of the site as there are currently no structures on the site although over half of the site would remain undeveloped and would be supplemented by additional planting. It is considered appropriate therefore to assess whether the layout as proposed together with the use of landscaping could help to ameliorate the visual impact and help to assimilate it within the landscape. The main impact of the lodges would be within close proximity to the application site rather than in longer distance views due in part to the single storey nature of the structures, topography and filtering of views by existing hedgerows and trees. The indicative plans show lodges running along most of the length of Rasen Road and along sections of Moor Road. The highest density of cabins is on the eastern field and the objections from the Tree and Landscape officer revolve around proximity to road frontage, insufficient landscaping and pressures that would be brought to bear on proposed trees. This is a reflection of the relatively large number of chalets proposed. A smaller number of lodges could potentially address the concerns raised. The scheme as it stands, however, would not be in accordance with LP 26 which weighs against the proposal.

**Impact on Heritage Assets LP25:** Holywell Grange in the ownership of the applicant is a Grade II listed late 18th Century farmhouse. The lodges and associated development are to the north, west and east with Moor Lane to the south.

The Local Planning Authority has a statutory duty (s66 of the Listed Buildings Act 1990) that:

*“In considering whether to grant planning permission... for development which affects a listed building or its setting, the local planning authority... shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”*

LP 25 sets out that proposals should protect, conserve and seek opportunities to enhance the historic environment of Central Lincolnshire.



In instances where a development proposal would affect the significance of a heritage asset (whether designated or non-designated), including any contribution made by its setting, the applicant will be required to undertake the following, in a manner proportionate to the asset's significance:

- a. describe and assess the significance of the asset, including its setting, to determine its architectural, historical or archaeological interest; and
- b. identify the impact of the proposed works on the significance and special character of the asset; and
- c. provide clear justification for the works, especially if these would harm the significance of the asset or its setting, so that the harm can be weighed against public benefits.

This is consistent with the revised 2018 NPPF. Paragraph 189 requires that in determining planning 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.”*

LP 25 also states that “unless it is explicitly demonstrated that the proposal meets the tests set out in the NPPF, permission will only be granted for development affecting designated or non-designated heritage assets where the impact of the proposal(s) does not harm the significance of the asset and/or its setting”. Paragraph 193 of the NPPF under the heading of considering potential impacts sets out that:

*“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance”*

Paragraph 194 continues *“Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification”*

If a development is considered to result in *“less than substantial harm to the significance of a designated heritage, this harm should be weighed against the public benefits of the proposal”*

A Heritage Impact Assessment (HIA) was submitted during the course of determination of the application and reviewed by the council's conservation officer prior to setting out the detailed deliberations above with a recommendation of refusal of permission as it “fails to preserve (leave as is) the setting” and does not meet the criteria in LP25 which would allow the development to be supported.

Harm is identified – and the Council therefore has a statutory duty to have special regard to the desirability of preserving the building or its setting. Paragraph 194 sets out that any harm should “require clear and convincing justification”.

It is considered that the harm identified to Holywell Grange would be less than substantial. Under Policy LP25 and NPPF paragraph 196 this harm should be weighed against the public benefit of the proposal which in this case is economic with job creation and wider benefits to the tourism industry. The omission of any lodges to the west of Holywell Lodge recommended by the conservation officer could add further positive weight to the proposal. As it currently stands the impact on heritage assets weakens the case for approval as it would be contrary to LP25.

**Flood risk and drainage LP14:** Concerns have been raised by residents that the development would increase the risk of flooding. The site falls within Zone 1 (Low Probability) which is land that has a less than 1 in 1000 annual probability of river and sea flooding. The size of the site necessitated the submission of a Flood Risk Assessment which has been assessed by the Lead Local Flood Authority who have confirmed that they are satisfied that surface water flooding has been adequately considered and proposed suitable mitigation methods put forward. No objection has been raised by the Environment Agency. Although details of surface water disposal have not been submitted this can be addressed by imposition of an appropriately worded condition.

Foul water is to be treated on site with an outfall shown to the Black Dike to the west of the site. Objections have been raised in terms of the potential pollution on Black Dike a site of nature conservation importance. The Environment Agency have raised no objections to the proposal and have placed an informative on their response in relation to the preferred hierarchy for foul drainage to be connected to the main sewer. Where this is not possible, any discharge of sewage or trade effluent made to either surface water or groundwater will need to be registered as an exempt discharge activity or hold a permit issued by the Environment Agency, in addition to planning permission. Objections have been raised that the Environment Agency may not grant a permit. It is not certain that it would be required and in any event it is reasonable to assume that a satisfactory foul drainage could be designed for the site. This is capable of being controlled by condition. Accordingly the proposal would accord with LP 14.

**Biodiversity LP21:** A Landscaping and Ecological Management Plan (LEMP) has been submitted in support of the application. It sets out aims and measures for the landscaping and use of the site to achieve high levels of biodiversity and ecological function. The application site comprises two fields, large sections of which are made up of improved grassland. On the south eastern part of the site is a separate smaller area. Enclosed by planting, this section contains the applicant’s dwelling, gardens and various associated outbuildings; including a partially demolished barn.

The two larger fields comprise of broadleaf and some coniferous plantation woodland, generally planted in the last 15 years, as well as scattered individual trees and small, more defined tree groups. Plantation woodland makes up the entire northern half of the western field and extends to much of its western edge, meaning that open space is contained to the southeast section of this part of the site. Within the denser areas of plantation woodland, small clearings and footpaths have been formed. Small blocks of plantation woodland/tree groups are also located within each field, located close to the enclosure of the applicant's private house/gardens.

There is a large pond located in the southern section of the western field. This pond holds water throughout the year and has an island formed in the middle. There are bare patches of earth around the pond edges, as well as scattered vegetation and trees. This will be retained. There will be minimal impact on existing trees and woodland throughout the site which is confirmed by the comments of the Tree and Landscape officer. Development is primarily concentrated on areas of improved grassland. Additional landscaping using native species will also help to enhance biodiversity. A landscaping scheme that is prepared in accordance with the LWMP can be conditioned.

The proposal is considered to accord with LP 21 and does not represent a reason to withhold consent

**Noise and disturbance, anti-social behaviour and impact on outdoor pig farm:** Objections have been raised on the grounds of increased noise and disturbance due to the potential for large numbers of people to be present on the site together with associated attendant activities taking place. To assess potential noise and disturbance impacts on the nearest dwellings a noise impact assessment was requested and subsequently submitted. This measured existing noise levels at certain locations around the perimeter of the site and then using noise measurements taken on an existing holiday park for comparison predicted future levels. These indicated that there would be no significant impact on properties closest to the site and by logical extension the limited impacts would reduce with an increase in distance. No objections are raised from public protection subject to the imposition of conditions in relation to a management plan for the site. If noise levels exceed those predicted to a significant degree on the site this would be subject to enforcement under environmental protection legislation.

Concerns have been expressed in relation to anti-social behaviour including an increase in litter and potential trespassing onto private land and feeding existing farm animals. These are not matters that can be regulated or controlled by the planning system. This also applies to concerns with crime and it is noted Lincolnshire Police raised no objections. There are worries expressed by a farmer that complaints from holiday makers could curtail the operation of the outdoor pig farm. These are noted and discussions have taken place with public protection officers on this matter who have verbally confirmed that the bar for taking any action is high and probably unlikely due

to the transient nature of the impact as the lodges are intended to be used for holiday purposes rather than a main dwelling which is permanently occupied.

**Loss of privacy:** Objections have been raised however these are not considered significant due to the nature and scale of the accommodation, existing and proposed vegetation filtering views, the location set back within the site and distance separation. As an example the indicative plans show a distance of approximately 90 metres from the nearest lodge to the western boundary of the site and approximately 60 metres to the bungalow at the junction of Rasen Road with Moor Road.

**Financial viability:** Concerns have been raised in objections from residents as to the potential viability of the proposal. Although not a policy requirement a private and confidential financial viability appraisal has been submitted.

**Controls on occupation of lodges to prevent permanent occupation:** This is capable of being controlled through planning conditions.

**Demands on call connect service from holiday visitor's impacting on use by residents:** This is noted although there is no restriction on the use of this service

#### **Planning balance and conclusion**

The proposal has been assessed against the provisions of the Development plan in the first instance, specifically policies LP1: A Presumption in Favour of Sustainable Development, Policy LP2: The Spatial Strategy and Settlement Hierarchy; Policy LP7: A Sustainable Visitor Economy to Support Growth; Policy LP13: Accessibility and Transport; Policy LP14: Managing Water Resources and Flood Risk; Policy LP17: Landscape, Townscape and views; LP21: Biodiversity and Geodiversity; LP25 The Historic Environment and Policy LP 26: Design and Amenity of the Central Lincolnshire Local Plan (2012-2036) and against all other material considerations including the Revised National Planning Policy Framework 2018 and Planning Practice Guidance.

The benefits of the proposal are a new footpath link to Snitterby tempered by the fact that there are limited facilities in Snitterby. 84 lodges will provide visitor accommodation which will benefit the tourism economy and the creation of an estimated 5 full time posts is a factor afforded strong positive weight.

The deliverability of the total 84 units could be subject to uncertainty as there are indications that the units could be sold to order rather than being provided upfront in their entirety, and marketed for sale as holiday lodges which reduces the benefit.

A shop on the site could be regarded as a benefit reducing the need to travel, however, it might compete with the small shop in Waddingham, thus undermining rather than supporting local rural services.

The on-site cycle hire facilities attract support however there is no robust mechanism for deliverability or certainty and as it seems to be targeted to long distance recreational cyclists rather than a mode of travel to access services the weight attached any benefit is limited. The mini bus service for use by holiday users and visitors to tourist attractions and as a pickup service from bus and rail stations is to be welcomed , however as there is no mechanism for delivery and continued provision this is a benefit that must be afforded limited weight.

It is considered that the proposal subject to the imposition of conditions discussed above would not harm the interests of highway safety; it can provide satisfactory surface and foul water disposal arrangements; and potential impacts on neighbouring dwellings through increased noise and disturbance or overlooking and loss of privacy are not considered significant. Measures are in place to enhance biodiversity.

The location of the proposal remote from settlements with a higher level of services and facilities weighs against the proposal as does a lack of evidence that supports the specific location for the type of development proposed.

Measures to improve the accessibility of the site other than by car within the context of the NPPF are noted above and are given limited weight .It is considered highly likely that the predominant means of transport to and from the site will be by use of a car contrary to sustainability.

The Council has a statutory duty to have special regard to the desirability of preserving the building or its setting. It is considered that harm will arise to the setting of the Grade II Listed Building.

Although considered to be 'less than substantial' harm, the impacts on the setting of designated heritage assets also weigh against the public benefit to the economy. It is not convincing that the benefits arising from the development are such so as to outweigh the harm identified.

The density and location of the lodges along road frontages would also detract from the character of the area. The positive benefits of the development to the tourism economy are on balance outweighed by the harm identified above and refusal is recommended as it would be contrary to the policies of the Central Lincolnshire Local Plan in particular LP 2 The Spatial Strategy and Settlement Hierarchy; Policy LP7: A Sustainable Visitor Economy; Policy LP17: Landscape, Townscape and Views; Policy 25: The Historic Environment

Policy LP26: Design and Amenity and Policy LP55: Development in the Countryside

**Recommendation:** Refusal

1. It is considered that the development is within an isolated location that would not amount to a sustainable rural tourism and leisure development. The benefits of the development to the tourism economy

are outweighed by the harm caused. The location and need for the site within this countryside location is not evidenced, in the context of the NPPF and the very limited improvements to accessibility offered means that that the predominant means of transport to and from the site will be by means of a car. There would harm to the setting of heritage assets and to the character of the area and accordingly it would be contrary to the Central Lincolnshire Local Plan in particular policies LP 2 The Spatial Strategy and Settlement Hierarchy; Policy LP7: A Sustainable Visitor Economy; Policy LP17: Landscape, Townscape and Views; Policy 25: The Historic Environment Policy LP26: Design and Amenity and Policy LP55: Development in the Countryside