



Appeal Decision

Hearing held on 30 January 2025

Site visit made on 29 January 2025

by L N Hughes BA (Hons) MSc MRTPI

an Inspector appointed by the Secretary of State

Decision date: 26th February 2025

Appeal Ref: APP/E2001/W/24/3352438

Land west of Southfield Lane, Tunstall HU12 0HZ

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant a part full and part outline planning permission.
 - The appeal is made by J & A Smales Ltd against the decision of East Riding of Yorkshire Council.
 - The application Ref is 23/01325/STPLF.
 - The development proposed is a hybrid application consisting of:
 - a) full planning permission for change of use of agricultural land to enable the siting of 180 static caravans with associated access road, car parking, landscaping and associated engineering works to create lake; and
 - b) outline planning permission (all matters reserved) for a reception and toilet/changing room facilities with associated car park area.
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Decision

1. The appeal is dismissed.

Applications for costs

2. An application for a full award of costs was made by J & A Smales Ltd against East Riding of Yorkshire Council. This is the subject of a separate Decision.

Preliminary Matters

3. The main parties confirmed a slight change in the description of development during its determination period to remove reference to a café/restaurant within the facilities building. The decision notice and the appeal form cite a slightly different description. As this provides better clarity, I have used it as the basis of my determination. I also find the address on the application form to be sufficiently accurate, notwithstanding that it is slightly different to that on the decision notice.
4. The proposal is submitted in hybrid form, with the reception and toilet/changing room facilities with associated car park area element of the scheme proposed in outline format only. All reserved matters for this area would be agreed via a future application, and I have therefore considered all plans to be only illustrative in respect of the outline. The remainder of the proposal, being the majority of the site, is made in full.
5. The East Riding Local Plan Update, comprising a Strategy Document Update and Allocations Document Update, was submitted for examination in 2023. The Inspector issued their final report on 30 December 2024, and found the Update to be sound subject to a number of modifications. The Local Plan Update is now intended for adoption by Full Council on 2 April 2025, to replace the extant 2016 Local Plan.

6. The Government also published a revised version of the National Planning Policy Framework ('the Framework') in December 2024. I invited the parties to comment on whether this updated Local Plan position or the Framework changes had any implications for this appeal. Neither party raised anything which they suggested to be substantive or determinative. The February 2025 Framework clarifications are also not substantive in this instance.

Main Issue

7. The main issue is the effect of the proposed development upon the character and appearance of the countryside.

Reasons

8. The site comprises an open field to the west of Southfield Lane, a short distance south of the small village of Tunstall. Further open fields lie to its north, west, and southwest. Immediately adjacent to the south is the existing caravan park of Holderness Country Park, which includes a consented westwards extension¹. To the east and southeast on the opposite side of Southfield Lane and beyond a field gap is the large caravan park of Sand le Mere, which extends to the cliff edge alongside the sea, and which has permission for expansion/part roll-back into the field directly opposite the appeal site.
9. The proposal is for a new caravan park comprising 180 static caravans, and a recreation lake in the middle accompanied by reception and toilet/changing room facilities, and a drainage pond in the northeastern corner. The access would be off Southfield Lane, with landscaping around and within the site.
10. The proposal would be built out in phases. Years 1-2 would be the recreation lake, drainage pond, and the boundary woodland and the southern boundary hedgerow. The following years would construct the infrastructure and caravans and internal landscaping in phases across the site. Years 2-3 would be the majority of the site's northeastern section, marked phase 2 on the phasing plan. Years 3-4 would be phase 3a then 3b in the southeastern and central southern section, then a few caravans in phase 2 to the north of the lake. Years 4-5 would be phase 4 in the southwestern section, and finally years 5-6 would be phase 5a then 5b in the northwestern section.
11. The Council and some local residents consider that the coastal windswept environment restricts normal vegetation growth, and so there is no guarantee that the landscaping proposed would provide the expected level of screening. I accept that this is indicated locally to some extent, but no other decisions have been presented whereby this was referenced as a specific issue. The species type and planting management would be determined further via conditions, as for other consents with indicative landscaping. I therefore accept the growing time periods proposed by the appellant as sufficiently realistic within this context.
12. The appellant explained at the hearing that the Landscape and Visual Impact Appraisal (LVIA)² assumes a worst case scenario that at year 1 the whole scheme is in place and the planting has just been put in. At year 10, this is also worst case because in reality there would have been an additional 2 years of growth.

¹ 23/03879/STPLF Holderness Country Park, Southfield Lane, Tunstall

² Pegasus, March 2023

13. The appellant further suggests that I could impose a condition to extend the time period for phases 4, 5a, and 5b to be built out. I agree that this would minimise their visual impact in allowing the landscaping longer to grow before construction. I have therefore assessed the proposal on the basis that there would be a 2 year delay after phases 2 and 3 were complete.

Character and Appearance

14. Policies S4 and EC2 of the East Riding Local Plan Strategy Document (ERLP SD) support tourism development in the countryside, including accommodation, where proposals respect the intrinsic character of their surroundings and where their scale and cumulative impact is appropriate for the location.
15. The East Riding of Yorkshire Landscape Character Assessment (LCA) identifies various Landscape Character Types (LCT). The site spans LCT19D 'Central Holderness Open Farmland' and LCT 20B 'Hornsea to Withernsea Coast'. LCT19D is characterised as a large scale landscape, with a gently undulating landform, being open and mainly arable agricultural land of generally large rectilinear fields, and little woodland. The LCA identifies the tourism and recreational development which has taken place, particularly recently built caravan parks, and that the loss of hedgerows and hedgerow trees has resulted in a loss of landscape structure.
16. The LCT19 has an overall medium value, and a medium susceptibility to recreational development, with the capacity to accept some if it respects scale, historic context, landscape pattern, and vernacular. There is a need to maintain and enhance these characteristics that contribute to its distinctiveness. I note the strategy makes no mention of caravan parks.
17. The LCT20 is a narrow strip of farmland and coastal development, with positive landscape features including a gently undulating landform affording views out to the sea, and scattered settlements contrasting with the large scale agricultural landscape which is exposed and open. In the LCT20B, the land use is predominantly arable farmland of large rectilinear fields, and caravan sites, which are noted as being a prominent landscape feature. The isolated farmsteads and well spaced villages contrast with the large scale arable landscape, an important characteristic in this LCA.
18. The quality of LCT20 is assessed as ordinary overall due to the presence of detractors such as numerous caravan parks, turbines, and a gas terminal. However, the LCA also highlights that the high value of this coastal landscape to the tourist industry in the East Riding should be recognised when considering landscape quality and development proposals. Coastal erosion is the major force for change, alongside the need for tourism and recreation facilities. The presence of caravan parks in fields adjacent to the coast has altered the land use and fragmented character, but a reasonably strong sense of place is maintained.
19. The LCT20 has an overall medium value, and a medium susceptibility to recreational development. The area is assessed as being sensitive to an increase in the number of caravan sites as a result of cumulative impacts on coastline views, but that it has some capacity to accept small scale recreational developments that are low key, respect the character and settlement pattern, and use appropriate materials. The strategy for this LCT is to protect village character

from the impact of large scale tourism and other development, which should not be highly visible in the landscape, and should seek to minimise cumulative effects.

20. The LVIA identified that the proposal would cause a high magnitude of change in the site's agricultural character. With regard to the landscape's overall medium value and medium susceptibility to recreational development, the resultant landscape impact would be major/moderate adverse change to the character of the site itself at year 1. While allowing a longer period for landscaping growth would delay this impact, at year 10 there would remain an adverse effect.
21. I disagree with the appellant that the degree to which this change would be apparent from locations beyond the site would be limited and localised. Its scale would extend the built form westwards to a significant extent, and affect a large area of the open rural landscape, exacerbated because of its height rising northwards. Although the landscape is not a 'valued landscape' under the Framework, nor designated for any value relating to landscape quality, it is clear from the LCA description that the landscape holds importance as part of the Heritage Coast.
22. In considering landscape effects whereby landscape is a resource recognised and valued by society as a whole, its distinctive character as described above would be unduly altered. I also accept to a certain extent the Council's argument that landscaping ought not to be regarded as a substitute for well-designed development. The Council is referring to intrinsic landscape and character harm, which is not just measured by visual effects. The addition of the appeal site and the extent this would draw caravan development westwards, would in cumulation with the existing (and consented) adjacent caravan parks, be a tipping point for this landscape character. In this vicinity it would alter from a landscape containing caravan parks, to a caravan park landscape.
23. Furthermore, the LCA states that within the LCT19D, as with the other parts of Holderness, woodland is scarce, and that the LCT20 is generally devoid of trees. Although some woodland is apparent in views from leaving Roos, this general lack is demonstrated by the appellant's 'Proposed Woodland and Wider Context' plan³. Other than woodland strips partially around Sand le Mere and the tree plantation to its south, the most proximate sizeable woodland to the appeal site is approximately 4km northwards. There is no tree cover of the appeal site scale southwards along the whole coastal stretch to Withernsea.
24. The LCT19 strategy section does state that native and locally characteristic woodland and tree planting will help to reinforce landscape pattern and add diversity to the landscape, and the LCT20 strategy aims to promote opportunities to introduce woodland and gap up hedgerows. Landscaping would be clearly necessary and beneficial in acting to screen the built form of the caravans, as has been consented to a lesser extent at the Holderness Country Park. However, for the appeal site I find that it would also cause limited harm in isolation, whereby its extent and visibility would itself reduce the open landscape character. The restoration of the former field boundaries would only be a very minor benefit in itself, as that enclosure would only be made to enable the change of use of the land away from traditional fields.

³ P22_0537_EN_101

25. In considering visual effects, the extent of change from multiple viewpoints would be cumulatively harmful. Parts of the development would remain visible despite the landscaping screening, even when mature, which would be more harmful while planting establishes. The development considered as a whole would be intensive and prominent, particularly when viewed from Southfield Lane and Rostun Road, the Public Right of Way (PROW) along the site's southern boundary from Roos village, and from Sand le Mere. Parts would also be somewhat prominent from some of the Tunstall dwellings, and on approach from Roos.
26. There would be a somewhat 'tunnel' effect along Southfield Lane whereby caravan parks enclose both sides of the narrow route. While these may be mostly screened behind landscaping apart from access points, this would still block the current open views of the wide open rural landscape. The landscape is already influenced by the existing caravan parks, but expansion across a large site, and one which extends significantly beyond the western and northern extents of those existing, indicates a harmful intensification of this use in this instance.
27. Night time lights and lighting from the existing parks are already visible in filtered views from Tunstall and the surrounding roads. The proposal's lighting would also be filtered by additional landscaping, and the lighting scheme would be controlled via a condition. However, Tunstall has no street lighting, with the immediate rural character being a predominantly dark landscape. The extent of the proposal's external lighting and internal caravan lights, would indicate its large scale and prominence at night time, exacerbated by its higher topography. This would cause harm to the landscape character.
28. The Landscape and Visual Statement of Case (LVSC⁴) paragraph 7.21 states that the noticeable change seen cumulatively with the existing caravan parks for users of Southfield Lane and PROW Roos F05, has effects which would often be experienced by people who are visiting the area to stay at one of the holiday parks in any event. The hearing discussions identified that the sensitivity conclusions were not applied differently to those receptors on this basis, but also that those visitors would be expecting for caravans to be a part of the landscape experience.
29. While such visitors would indeed be clearly expecting their destination to be an environment dominated by caravans, that does not indicate that they would expect only limited open countryside views in their immediate surroundings. In particular, the LVIA does not consider the impact on those multiple caravan occupants within Sand le Mere, who currently experience the area's rural character in part through the appeal site's contribution as the largest open field within view. New caravans within the park's extension area would be at a lower land level, and so would not fully block such views. This experiential and perceptual impact adds to my assessment of a harmful cumulative impact.
30. I acknowledge that from some viewpoints the new boundary planting would help to screen some existing caravans on the adjacent parks. Although Sand le Mere is long established and forms part of the landscape character, those caravans are predominantly light in colour and very densely spaced. As such they do have a negative impact on the landscape in general, and so additional screening from the higher vantage points from the Roos footpath or along Rostun Road would be a minor benefit to take into consideration in assessing the harm I have identified.

⁴ Pegasus, September 2024

Character and Appearance – Precedent Examples

31. The appellant acknowledges that each proposal must be treated on its own merits, but submits several caravan park permissions as comparison precedent examples relating to character impact⁵. The Low Skirlington scheme provides support from its much greater size of 420 caravans, and thus its potential cumulative impact alongside the existing caravans in its vicinity. It will not be phased, so landscaping would provide less mitigation for its immediate visual impact over the first few years compared to the appeal site. It is not connected by footpaths to a local settlement with services, and the appellant suggests it will have fewer public benefits.
32. However, a key difference is the lesser visibility of Low Skirlington from surrounding areas. It has a flatter and less prominent topography, and the lack of footpaths results in fewer visual receptors. Significantly more formal landscaping already existed such that the proposal will not impede fully open views, and more landscaping is proposed than for the appeal proposal. The Council considers the Low Skirlington landscape is more developed and more characterised by existing caravan sites, but also that these existing parks are less visible. The site is also further away from settlements, and within a different LCT. This led to the Council's judgement that the proposal would thus respect the intrinsic character of its surroundings, unlike at the appeal site.
33. Low Skirlington will also be accessed off a 2 lane marked carriageway, with wide engineered junctions on both sides into existing parks, and generally lined by a long extent of formal landscaping. This is in contrast to the Southfield Lane single carriageway and narrower junctions, which contribute to its more rural character. The appeal site would extend almost double the westward depth of the caravan park to its south (including its extension), compared to the Low Skirlington extending westwards only a very limited extent beyond the park to its south. Lastly, the Low Skirlington site would provide higher economic benefits across direct spend, gross value added, and job generation.
34. The South Cliff approval is a similar site size to the appeal site in terms of new land take. Again, the appellant infers precedent support because it has no phasing and significantly less landscaping, resulting in a more prominent visual impact which was deemed acceptable. However, this is an extension and reconfiguration of the existing holiday park, and therefore is more associated with the existing site and a lesser change to the overall character. It is also within a relatively flat landscape within a different LCT on the urban fringes of Bridlington, adjacent to its defined development limits. As such its setting is a clearly different context.
35. The Holderness Country Park extension projects westwards into an open field. However, it is much smaller, a lesser projection, and with a much lower overall visibility. The Cowden Holiday Park scheme is far smaller, and again is an expansion of the existing park. The Roos example is on an allocated residential site within the village's defined development limits, for 14 caravans for permanent occupation. Despite some landscape character similarities to the appeal site, it is therefore a significantly different proposal and context.
36. Overall, I find no substantial precedent from these examples to the extent that they should be determinative to my decision.

⁵ Low Skirlington: 19/04358/STPLF Land South of The Grange, Hornsea Road, Skipsea.
South Cliff: 17/01035/REG3 Land West of South Cliff Caravan Park, Pioneer Road, Wilsthorpe.
Cowden Holiday Park: 21/04682/STPLF Land East of The Cross Keys, Main Road, Cowden.
APP/E2001/W/20/3261822, Council ref 18/01920/PLF Land North of Eastfield House, Pilmar Lane, Roos.

Conservation Area

37. The Tunstall Conservation Area (CA) lies approximately 200m to the north of the appeal site. Section 16 of the Framework requires great weight to be given to the conservation of designated heritage assets. The significance of the CA is its particular historic and architectural interest, derived from its likely medieval layout, and traditional farm buildings constructed from beach cobbles. This building material also reflects the village's relationship and proximity to the sea, part of its historic surrounds.
38. I also have a statutory duty under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to consider the impact of the proposal on the special architectural and historic interest of listed buildings and their settings. The Grade I listed Church of All Saints is a primarily medieval structure. It is the focal point of the village and the CA due to its greater scale and prominent location. Its significance lies in the architectural and historic interest of its built fabric, due to its age and the preservation of historic architectural detailing both internally and externally. Its churchyard and historically associated buildings contribute to its setting, providing historic context and insight into the populace the church served.
39. Three of these other CA buildings are Grade II listed; Town Farmhouse, Manor Farmhouse, and Barn about 30 Metres South of Manor Farmhouse. Again, their significance derives from their architectural features, and their contribution to the understanding of the development of Tunstall.
40. I acknowledge the interested party objections that the proposal would not preserve the separation and identity of the village and the CA. However, neither the Council nor Historic England raised an objection on these grounds. There would only be limited inter-visibility between the appeal site and the CA in general, and even less for the church tower and the listed buildings. Although in general the agricultural fields in the parish contribute a very minor amount of historic interest to the setting of the CA, the field systems and layouts are already altered from their historic form. No specific historic functional relationship has been identified between the appeal site and the Church. Consequently, overall, the proposal would therefore preserve the significance of the CA and the listed buildings as designated heritage assets.

Character and Appearance - Conclusion

41. Overall, the proposal would cause substantial harm to the character and appearance of the area. It would not respect the open and intrinsic character of the area, or have an appropriate scale and cumulative impact for its location, as required by the ERLP SD Policies S4 and EC2. It would also conflict with the Policies ENV1 and ENV2, which together require proposals to safeguard and respect the diverse character and appearance of the area, be sensitively integrated into the existing landscape, demonstrate an understanding of the intrinsic qualities of the landscape setting, and make the most of opportunities to protect and enhance the landscape characteristics and features as described in the LCA.
42. It would also conflict with the Framework paragraph 88(c) whereby rural tourism and leisure developments should respect the character of the countryside, and with paragraph 135 which requires development to be sympathetic to local character and history, including the surrounding landscape setting, and to maintain a strong sense of place. I give this harm significant weight overall.

Other Matters

Benefits

Economic

43. The Council does not dispute the proposal's suggested economic benefits, and considers they should be given significant weight. The proposed annual local visitor expenditure would be approximately £2.6million per year, with a further £1.3million per year in gross value added (£11.1million at present value over 10 years) for the local and regional economy. This spend would support the equivalent of 40 full time jobs in the tourism sector, and a multiplier effect of a further 22 full time equivalent jobs in the tourism sector and the wider regional economy. The proposed development would be most likely to benefit the retail, accommodation and food services, and arts, entertainment and recreation sectors. The East Riding of York retail sector has experienced a jobs decline in recent years, with a decline in visitor popularity of Hornsea and Withernsea.
44. The appellant has submitted extensive information in support of this economic need and benefit, including how the proposal would meet the aims and priorities in regional and local strategic documents and economic strategies. In particular, the Council's Tourism Accommodation Study (AECOM, 2016) is part of the evidence base for the Local Plan Update. It identifies where investment and growth is most needed for tourism accommodation in East Yorkshire. The site is just over 3 miles from Withernsea as the nearest town, which the appellant identifies as being most in need of regeneration out of all the East Riding towns. A priority of the Economic Development Strategy (2018-22) is to support growth in the tourism sector, with a continuing requirement for tourism development and especially tourism accommodation.
45. The several local services in Roos would benefit from the additional spending, including due to the direct pedestrian access. The landowner/appellant spoke at the hearing to suggest that local businesses such as his fish and chip shop would close without the direct spending from existing tourists from caravan parks, and that the proposal would help their farming business diversify. I note the similar letters from several interested parties, identifying benefits to their local or regional businesses, or supporting general job creation and visitor expenditure.
46. The inclusion of the activity lake within the package would provide added value and an additional reason to entice visitors. The Council does not consider a specific need for the lake has been demonstrated. However, I accept the appellant's position that this would create a point of difference to existing sites and a unique offer within the area, supported by the lower caravan density and higher verdancy than other parks. Indeed, this is supported by the Local Plan Update, which identifies at Table 12 that the key tourism accommodation requirements for North and South Holderness are to encourage the development of new commercial accommodation to support leisure and business visitors, which should be part of, or linked to development in, attractions, activities, and experiences. Watersport activities are specifically referenced as a theme to consider, and are also referenced as an opportunity within the Tourism Accommodation Study.
47. The proposal is thus supported in this regard by the ERLP SD Policies EC1 and EC2, which aim to support the growth and diversification of the East Riding economy, and encourage tourism developments which particularly help to meet

existing deficiencies and help strengthen and broaden the tourism offer. The Framework paragraph 85 also provides that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. Overall, I concur with the main parties that the proposed economic benefits should cumulatively incur significant weight.

Biodiversity Net Gain

48. The ERLP SD Policy ENV4 requires all proposals to seek to achieve Biodiversity Net Gain (BNG) where possible, as does the Framework paragraph 187(d). For the avoidance of doubt, and to acknowledge the High Court ruling⁶ cited by the appellant, I give full weight to the entirety of the proposed BNG because there was no statutory requirement for a 10% minimum BNG when the application was submitted. The proposal would create woodland, hedgerows, meadow grassland, species rich amenity grassland, and water bodies. This would result in BNG gains of 65.40% of on-site habitat, 63.97% of hedgerow, and 220.42% of water courses.
49. The appellant considers that substantial or considerable weight should be given to the BNG as a benefit, and certainly higher than the moderate weight discussed in the Weston Homes Plc judgement. However, for BNG in particular this assessment must consider a range of factors beyond the percentage increases. These include the absolute size increase in biodiversity units, and the existing and proposed ecological value. Attempting to make direct comparisons against other percentages expressed on other permissions is not necessarily helpful.
50. The Council credits the BNG with limited weight, because the BNG Report (Crow Ecology, November 2022) identifies that the significant uplift in net change is because the greatest habitat changes are taking place on the existing low ecological value arable land. I note that the new habitat distinctiveness created would range from Very-Low to Medium value, and the proposed habitat conditions would be Moderate. The recreation lake would score Fairly-Poor in the target time, the drainage pond would achieve a Good condition, and the dry ditches would improve from Poor condition to Moderate. The hedgerows would score Moderate to Good condition within the target period, and with constant good management after 5 years, all could achieve a Good condition.
51. Overall, taking into account the proposed BNG against the current habitat value, I ascribe moderate weight to the BNG benefit of the appeal proposal.

Sustainable Location

52. Visitors to the site could walk to Roos, or use the nearby Sand le Mere bus stop to access Hornsea, Withernsea, and Hull. This level of access is likely to be greater than for many other potential sites along the coast, and so supports the appeal site as a sustainable location to meet the need for tourist accommodation across the wider area. This is reinforced by the ERLP SD Policy EC4, whereby new development will be supported where it is accessible by sustainable modes of transport. The Policy EC2 justification text outlines that the rural nature of the East Riding means that access to tourism facilities will often be by car, but that visitor destinations should be accessible by sustainable modes of transport wherever possible. I give this benefit moderate weight.

⁶ Weston Homes Plc, R (On the Application Of) v Secretary of State for Levelling Up, Housing and Communities & Anor [2024] EWHC 2089 (Admin)

Other Benefits

53. The proposal would include biodiversity enhancements beyond the BNG, such as an invertebrate den, amphibian and reptile den, and a barn owl box, which I give minor weight in favour. As identified in the character section above, the restoration of historic field boundaries and the screening of neighbouring caravan sites from the new landscaping would be very minor and minor benefits respectively, to which I give minimal and minor weight.
54. The recreation opportunities arising from the lake would offer health and welfare benefits to local residents, the wider general public, and caravan park visitors. The Council attaches moderate weight to this benefit, and due to the lack of similar existing facilities in the vicinity, I concur. The main parties agreed at the hearing that the drainage proposal would at best, be a very minor benefit to improve water flooding on Southfield Lane. This attracts minimal weight.
55. The highway improvements at the Withernsea Road and Southfield Lane junction would be mitigation for the proposal, rather than a benefit. I do not find the roll-back needs from future coastal erosion to provide support due to the other options available to the existing parks, and the very long timescale involved.

Special Protection Area

56. The site lies approximately 0.9km to the west of the Greater Wash Special Protection Area (SPA), which is afforded protection under the Conservation of Habitats and Species Regulations 2017 as amended (the Habitat Regulations). Habitat features support populations of nationally important overwintering and breeding bird species, and internationally important migratory coastal birds. As the Competent Authority, I may only grant permission after having ascertained for myself that the proposed development would not affect the integrity of these and any other protected sites.
57. The parties agreed during the application determination period that the proposal would not cause any Likely Significant Effect (LSE) on the SPA. I sought further confirmation from Natural England, particularly due to my concern that increased visitors could increase local recreational disturbance. However, discussion at the hearing clarified this matter to my satisfaction, and Natural England also subsequently responded that there would be no LSE, and confirmed no objection. In any event, as I am dismissing the appeal on other grounds, I do not need to consider this matter in any greater depth.

Planning Balance and Conclusion

58. In considering the planning balance, I have identified above that the appeal proposal would cause significant harm to the landscape character, to which I give significant weight. I also give significant weight to the proposal's economic benefits, and moderate weight to the BNG benefit, the sustainable location, and the health and welfare benefits of the recreation lake. I consider these benefits in cumulation with the minimal to minor weight I give to the benefits of improving flooding, screening of adjacent sites, restoration of field boundaries, and biodiversity enhancements.
59. I do find the harm and benefits to be relatively finely balanced for the proposal as a whole. However, the determination of the planning balance is not a mathematical calculation or a numerical scale. There is an inherent 'range' within each term used

when defining the weight to be given. It is also not necessarily the case that the identification of several different benefits must amount to more cumulative weight than a single matter of harm.

60. With relation to the economic benefit as being of most significance, my reasoning above explained the strong development plan and evidence base encouragement given to economic and tourism investment in this area. However, all caravan park proposals of a similar size in this wider area, or as a cumulation of smaller proposals, would generate a similar level of economic benefits. If the development plan process had judged this economic benefit from caravan parks of this size to be of such importance and significant weight that it would inevitably outweigh all other matters, policies would contain no reference to the need to temper these benefits with regard to character impact. The landscape itself as a whole across this area has a value to tourism, in being a key attractor to visitors.
61. As such, I find the harm to the landscape character to be so significant in this instance, that it would outweigh the cumulative benefits.
62. Overall therefore, the proposal would conflict with the development plan as a whole. With no other material considerations outweighing this conflict, for the reasons given above I conclude that the appeal is dismissed.

L N Hughes

Inspector

APPEARANCES

FOR THE APPELLANTS:

Mr Peter Hopkins Associate Planner, Pegasus Group

Ms Frances Horne Director, Pegasus Group

FOR THE LOCAL PLANNING AUTHORITY:

Mrs Karen Abba Principal Planning Officer

Mr James Chatfield Development Management Team Leader

Mr Bill Blackledge Managing Director, 2B Landscape Consultancy Ltd

INTERESTED PERSONS:

Mrs Christine Midgley Tunstall Village Hall Group

Cllr Sean McMaster South East Holderness Ward

Mr Andrew Smales Appellant

DOCUMENTS SUBMITTED AT/FOLLOWING THE HEARING

1.	Mrs Midgley	Photos of flooding, taken 6 January 2025
2.	Council	Draft Conditions
3.	Natural England	Consultation response to the Planning Inspectorate dated 11 February 2025.