



26th October 2024

North Lincolnshire Council

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Sent by Email

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Dear Mr Skelton,

Application References: PA/2024/1181

Site Location: Westfield Lakes Caravan Park, Far Ings Road, Barton-upon-Humber

Proposed Developments: *Application for a Lawful Development Certificate for confirmation that the site benefits from the 1991 Planning Permission Ref 7/113/1991 dated 3rd December 1991 for 'remove condition 2 of planning permission BA/3/72B and 7/RBT/16/80 to allow all year-round residential use of the existing caravan site'*

Lincolnshire Wildlife Trust [The Trust, hereafter] is a conservation charity in the county with a strategic remit to support conservation of the natural world, lead on the recovery of key habitats and species, and empower local communities to take action for nature. The Trust is supported by over 27,000 members across Lincolnshire.

Thank you for inviting The Trust to comment on this application. Our officers have reviewed the applicant's submission and the key arguments for the continued validity of the site as a caravan park based on the 1991 permissions. On the basis of the documents presented, The Trust wishes to register a **formal objection** to the granting of this Lawful Development Certificate [LDC, hereafter].

The Trust maintains its standing objections over redevelopment of this site with regards ecological impacts and disturbance concerns, in addition to the lack of a Habitat Regulations Assessment for the Humber Estuary and its multiple conservation designations.

The applicant has set out a technical case that the historic caravan park permissions remain valid, on the basis that no change of use has occurred, and that the land in the Eastern and Western fields has not been subject to any ancillary use whilst a hotel.

As an interested party whose property encompasses the proposed caravan site, Trust officers have undertaken a comprehensive review of available information sources and drawn on direct officer experience and anecdotes of Westfield Lakes site usage. There is demonstrable evidence that the site, and in particular the Eastern field, has been utilised for alternative commercial operations for a prolonged period, and that several of the applicant's assertions over site usage are incorrect. We have presented our position and associated evidence in further detail below.

Lincolnshire Wildlife Trust is a company limited by guarantee registered in England, no. 461863 and is registered as a charity, no. 218895 VAT no. 613 9067 44



Ancillary Commercial Operations

In reference to the application documents, in particular the main basis of the supporting statement and case for the applicant regarding site usage;

4.4... 'In this case, the Applicant has to demonstrate that a continuous use of the land as 'ancillary hotel uses' has not occurred for a continuous period in any 10 year period to the date of this application, which would then be sufficient to demonstrate that the 1991 Permission remains extant and the application site remains in caravan site use.'

There is clear evidence to demonstrate that the structure, referred to as 'The Chalet' in the Eastern field in the applicant's supporting statement, is well documented as 'Appletree Lodge' and was operated as commercial publishing premises, registered from 2004 to 2023. This is evidenced by;

- i. Social media images of Appletree Lodge with external branding in-situ for both Daisa Original Designs Ltd and Partnership Publishing Ltd, alongside external reception signage. [Appendix 1]
- ii. Multiple business registrations to Appletree Lodge at Companies House. [Appendix 2].
- iii. Mrs Daisa Morgan stated as a named officer and person of significant control for Bridge Publishing (UK) Ltd, Daisa Original Design Ltd and Partnership Publishing, which are all registered to Westfield Lakes and Appletree Lodge. [Appendix 2].
- iv. Mr Richard Morgan and Mr Thomas Hazeldine stated as named officers of Bridge Publishing (UK) Ltd, and also as named officers and persons of significant control of The Humber Bridge Country Hotel Ltd.
- v. Various social media images and a video walkthrough of the internal office layout of Appletree Lodge. [10th April 2021 / Appendix 3]
- vi. Social media videos of the Partnership Publishing team confirming Appletree Lodge's address and location, and undertaking a walkaround of the venue including wider aspects of the Eastern Field [20th Feb 2019].
- vii. A series of Partnership Publishing events operated from the Humber Bridge Country Hotel, including; book launches, publishing workshops and drop-ins, as advertised on social media and through the management platform Eventbrite.
- viii. Further, utilising <https://www.tax.service.gov.uk/business-rates-find/search> we note through a search of business rates for the DN18 5RG postcode, that neither Appletree Lodge, or the aforementioned publishing companies are identified as registered for business rates at any point. We note multiple valuation dates in 2023, 2020 and 2017 for The Reeds Hotel and Humber Bridge Country Hotel which cross-over with the operations of Appletree Lodge as a commercial premises. Therefore, all businesses within the Westfield Lakes curtilage must have been considered encompassed within operations of the Hotel.



Residential Caravan Activity and Imagery

In reference to the application documents, in particular the main basis of the supporting statement and case for the applicant regarding on-going residential caravan occupation;

4.19 'Laister was unable to locate any images via Google Image Search that definitively or strongly indicate activity associated with the hotel on the eastern area, except for vehicles passing along the access through the eastern area.'

4.84 – 'The council alleges that there have been hotel-related ancillary activities taking place within the Eastern Field, without providing any evidence of this. However, upon examining numerous aerial photographs from 2003 to 2013 in this report, there is no activity associated with the hotel operations that can be found taking place in the Eastern Field.... In fact, as stated above, the aerial photographs clearly show two caravans being located at the northern boundary, and then one, over time, which would maintain the 1991 Permission's use in this field.'

We refer to Appendix 4, presenting open-sourced imagery and hyperlinks to the 2 most prominent online mapping platforms, Google Earth and Bing Maps.

In review of the 'Historic Imagery Layer' on Google Earth, this allows for review of multiple date-stamped images in a timeseries, The Trust's interpretation is that the final 2 remaining residential static caravans were last photographed onsite on the 31st December 2003 adjacent to the lake on the Southern boundary of the Eastern field. Subsequent imagery from 2007 – 2022 confirms their removal.

We question the interpretation and narrative of the applicants in their supporting statement, justifying on-going residential caravan activity in the Eastern field through references to 'The Chalet', and 1 or 2 white 'caravans' [referred to as 'modular buildings' hereafter] which are evident in imagery from 2007 abutted to Appletree Lodge, and removed at the next photo series in 2015.

As detailed above, Appletree Lodge was in operation as a commercial business premises throughout this period. Further, imagery sourced from Bing Maps clearly identifies a direct physical structure between the single modular building visible in 2007 and Appletree Lodge, which appears to be a boardwalk or sheltered walkway.

Contrary to the applicant's narrative, Bing Maps imagery at a higher resolution [Appendix 4 – inset] evidences the modular building as having a flat roof and a limited number of small windows, indicative of a standard portacabin or similar.

In addition, when 2 modular buildings are in-situ in imagery from 2007, the distance between the nearest modular building and Appletree Lodge measures pessimistically at 2m. In light of this imagery, coupled with the commercial nature of Appletree Lodge, and proximity, The Trust is of the opinion that these white modular buildings were likely additional commercial space and were not independent residential caravans as asserted by the applicant.



In summary,

- There is a clear and substantive body of evidence that a series of publishing businesses affiliated to the hotel and its directors were in operation at Appletree Lodge in the Eastern field, registered over a period from 2004 – 2024, with social media imagery evidencing occupation up to 10th May 2021.
- The last indications of residential caravan occupation of the Eastern field are through Goole Maps imagery dated 31st December 2003.
- The applicant has presented inaccurate information when asserting that ‘The Chalet’, known as Appletree lodge, is evidence of on-going residential occupation and maintenance of caravan park infrastructure in the Eastern field from 2003 onwards.
- The identification of 1 or 2 white modular buildings abutted to Appletree Lodge in 2007 as residential statics caravans by the applicant, is not supported by higher resolution imagery sourced via Bing Maps. All indications, based on building design, proximity and interconnecting structures, suggest this was additional commercial space associated with the businesses operating from Appletree Lodge.
- There is a direct association between named operators of hotel and named operators of publishing companies, through specific individuals and known marital relationships. There are multiple examples of ancillary and affiliated use of the hotel premises and wider eastern field by these publishing companies, as marketed within their social media accounts and formal event promotions.
- The weight and balance of evidence concludes that the Eastern field has been used for on-going commercial operations for a significant period, sufficient to constitute a change of use, and invalidate the applicants proposed case for granting a lawful development certificate.

Yours sincerely



Dr James Wood

Lincolnshire Wildlife Trust





Appendix 1 - Images sourced from the Partnership Publishing's Facebook page evidencing branding and naming convention.

Image 1 - Confirming external branding, business address and naming convention of Appletree Lodge for The Chalet.



Image 2 - External branding, business address and naming convention of Appletree Lodge in-situ on the Chalet.



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is a company limited by
guarantee registered in
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Image 3 - External branding, business address and naming convention of Appletree Lodge in-situ on the Chalet.



Appendix 2 – Companies House registrations for multiple affiliated businesses, evidencing independent registration of Appletree Lodge.

1. Daisa Original Designs Ltd [04729687]

- i. We refer to Companies House and the filing history for Daisa Original Design Limited, specifically;
 - a. The company's change of registered address dated 14th May 2004 to "Appletree lodge, Westfield Lakes, Far Ings road, Barton-upon-Humber, North Lincolnshire, DN18 5RG".
 - b. The company's change of registered address dated 6th May 2022, from Appletree Lodge, Westfield Lakes, Far Ings Road, Barton-upon-Humber North Lincolnshire DN18 5RG United Kingdom to Unit 3 Concorde House, Limber Road Kirmington Ulceby DN39 6YP on 3 May 2023.
 - c. Mrs Daisa Morgan as an active registered officer appointed on 10th April 2003, and as a person of significant control notified on 6th April 2016.

2. Partnership Publishing – [12888463]

- i. We refer to Companies House and the filing history for Partnership Publishing Services Ltd specifically;
 - a. The company's article of incorporation dated 18th September 2020 stating their registered office as "Appletree lodge, Westfield Lakes, Far Ings road, Barton-upon-Humber, North Lincolnshire, DN18 5RG".
 - b. The company's change of registered address dated 3rd May 2023, from Appletree Lodge, Westfield Lakes, Far Ings Road, Barton-upon-Humber North Lincolnshire DN18 5RG United Kingdom to Unit 3 Concorde House, Limber Road Kirmington Ulceby DN39 6YP on 3 May 2023.
 - c. Daisa Morgan as a registered officer appointed on 18th September 2020, and remaining, and as a person of significant control notified on 18th September 2020.

3. Bridge Publishing (UK) Ltd

- i. We refer to Companies House and the filing history for Bridge Publishing Company (UK) Ltd specifically;
 - a. The company's change in registered address dated 23rd September 2010, stating their registered office as "Westfield Lakes, Far Ings road, Barton-upon-Humber, North Lincolnshire, DN18 5RG".



- b. The company's change final annual return dated 9th July 2015, confirming the register address remained from Westfield Lakes, Far Ings Road, Barton-upon-Humber North Lincolnshire DN18 5RG. Further, the identification of Mr Richard Morgan, Mr Thomas Hazeldine and Mrs Daisa Morgan as shareholders.

4. Humber Bridge Country Hotel Ltd [08870383]

- i. We refer to the Companies House, and identification of Mr Richard Morgan as a registered officer and person of significant control, and Mr Thomas Hazeldine as a registered officer.



Appendix 3 – Social media image evidencing use of Appletree Lodge as a commercial premises.

Social Media

- i. Partnership Publishing Facebook – Video Officer walkthrough 10/04/2021
- ii. Partnership Publishing Facebook – Video address, location, and walkaround of the venue including wider aspects of the Eastern Field 20/02/21
- iii. Partnership Publishing Facebook – Author photo outside lodge 18/09/2020
- iv. Partnership Publishing Facebook – Author photo outside lodge 30/09/2020
- v. Partnership Publishing Facebook – Author photo inside lodge 29/09/2020
- vi. Partnership Publishing Facebook – Author photo outside lodge 29/09/2020
- vii. Partnership Publishing Facebook – promotional photo outside lodge 10/09/2020
- viii. Partnership Publishing Facebook – promotional photo outside lodge 01/09/2020
- ix. Partnership Publishing Facebook – multiple interior office photos 04/08/2020
- x. Partnership Publishing Facebook – promotional photo outside lodge 17/04/2019
- xi. Partnership Publishing Facebook – promotional photo outside lodge 24/12/2018
- xii. Partnership Publishing Facebook – promotional photo outside lodge 24/12/2018
- xiii. Partnership Publishing Facebook – Author photo outside lodge 17/10/2018
- xiv. Partnership Publishing Facebook – multiple staff photos utilising eastern field.
- xv. Partnership Publishing Facebook – promotional photo outside lodge 30/04/2018
- xvi. Partnership Publishing Facebook – ‘Welcome to Daisa & Co’ photo 09/02/2018
- xvii. Partnership Publishing Facebook – Photo stating ‘Appletree Lodge...Registered office of Daisa Original Design Limited’ – 18/02/2017



Appendix 4 – Open source mapping platform imagery

Google Earth – Historic Layers

- i. 21/03/2022 – no caravans in-situ
- ii. 16/06/2021 – no caravans in-situ
- iii. 21/09/2021 – no caravans in-situ
- iv. 26/08/2019 – no caravans in-situ
- v. 17/07/2017 – no caravans in-situ
- vi. 27/04/2015 – no caravans in-situ
- vii. 31/12/2007 – 2 white modular buildings in-situ, possible link to Appletree lodge
- viii. 09/05/2007 – 1 white modular building, possible of link to Appletree lodge
- ix. 31/12/2003 – 2 statics caravans adjacent to lake.

Bing Maps

- i. Bing Maps ‘Birdseye’ imagery evidencing direct linkage between white modular building and Appletree Lodge.



- ii. Bing Maps 'Birdseye' imagery evidencing modular building flat roof and commercial frontage.



[End]

