



## SEVEN LAKES COUNTRY PARK

### TRANSPORT TECHNICAL NOTE

17 December 2025



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# 1. Introduction

## 1.1. Context

1.1.1. Evoke Transport Planning Consultants Ltd (Evoke) has been commissioned by Unity Holidays to provide transport and highways advice in support of a live planning application (ref: PA/2025/1310) at Seven Lakes Country Park, Wharf Road, Crowle. The local planning authority (LPA) and the local highway authority (LHA) is North Lincolnshire Council (NCC).

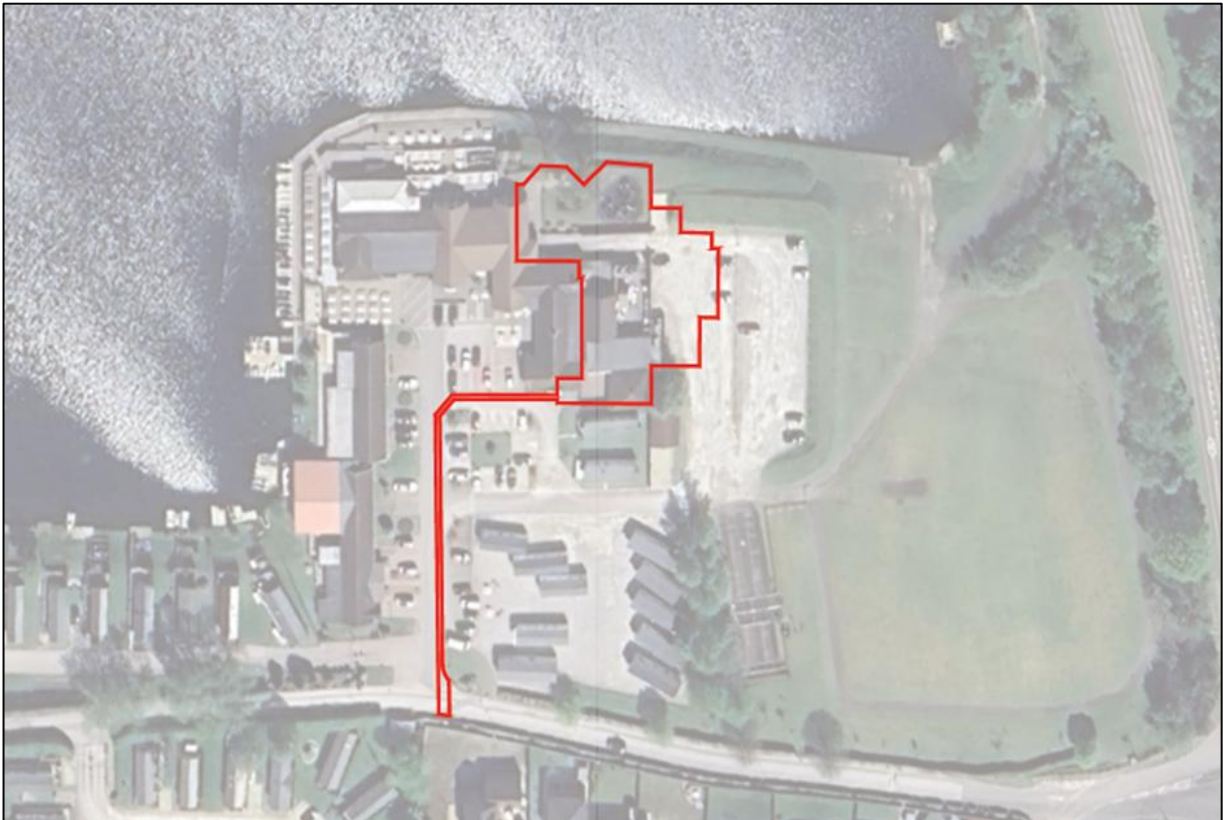
## 1.2. Site Location and Context

1.2.1. Seven Lakes Country Park is located to the west of the A161 Wharf Road, approximately 1.9km to the south of Crowle town centre. The Country Park was established as a holiday park in 2003 and now accommodates between 600 and 700 holiday homes, along with fishing lakes, recreational land, a central clubhouse and facilities. The Country Park is accessed via a private road to the west of the A161 Wharf Road which provides access to the internal road layout serving holiday homes as well as the Country Park facilities.

1.2.2. The application area is located at the eastern extent of the Country Park and is part of the central facilities. The application area currently comprises of existing storage facilities and garages, rear yard and paved areas to the rear. It also comprises of an existing play area, timber fencing, brick walling, wind lobby, back of house area for kitchen, and further areas of paving and overflow car parking. With regards to the overflow car park, this was constructed without planning permission however this has become lawful in use over the passage of time.

1.2.3. The location of the application area within the wider Country Park is shown in Figure 1 below.

**Figure 1 – Site Location**



Source: Design and Access Statement, Leisure Concepts Design

### 1.3. Proposed Development

- 1.3.1. Ownership of the Country Park changed hands in 2025 and the new owners would like to invest in the Country Park, increasing the quality of the central facilities to encourage higher-value ownership and to enhance the guest experience.
- 1.3.2. As such, live planning application (ref: PA/2025/1310) proposes *“upgraded and expanded central facilities complex including new stage feature/events space and amusements area, outdoor and indoor swimming pools, external play areas, and associated toilet and change facilities, plant rooms, infrastructure, landscaping and other works.”*
- 1.3.3. The proposed development ultimately comprises of the following works:
- Creation of a new outdoor and indoor pool as well as storage and plant in conjunction with the pool;
  - Creation of a pool changing area and changing room;
  - Landscaped sunbed terrace;
  - Landscaped pedestrian boulevard (promenade);
  - Retained and proposed play area and relocated outdoor play swings;
  - Proposed amusement and stage area; and
  - New glazed lobby.
- 1.3.4. The primary objective of the works is to modernise and upgrade the central facilities on site. The development will update and enhance the park’s facilities to be accessed by existing visitors and it is not anticipated to increase overall visitor numbers or generate more traffic but offer a better quality experience.

### 1.4. Planning History

- 1.4.1. As noted above, this proposed development is currently subject to a live planning application (ref: PA/2025/1310). The planning application was validated in November 2025 and is currently pending consideration.
- 1.4.2. NCC as the LHA has provided two consultation responses on the live planning application. The first comments are dated 1 December 2025 which read:
- *“Looking at the submitted information, none of the proposed works impact on the adopted highway or on the parking provision, so with this in mind Highways have no comments or objections to make on this planning application.”*
- 1.4.3. NCC provided further consultation comments on 12 December 2025 which in summary state:
- *That the proposals appear to upgrade the main facilities at the Country Park to improve visitor experience;*
  - *That the Design and Access Statement suggests no increase in vehicular traffic;*
  - *Requested confirmation on whether the facilities will be for sole use by guests or if they will be open to the general public. If the former, the proposals would unlikely lead to increase in vehicle movements and a condition on any planning permission granted is requested to restrict usage to on-site guests. If the latter, this would have the potential to increase vehicle movements to/from the site and more details should be provided.*
- 1.4.4. As such, this Transport Technical Note (TTN) has in part been prepared to respond to NCC Highways’ comments. The other aim of this TTN is to respond to consultation comments raised by the public. Concerns raised by the public include, in summary:

- Concerns regarding the safety of the access off the A161 Wharf Road with comments on “poor visibility” raised;
- Pedestrian safety issues; and
- Concerns regarding increases in traffic volumes.

1.4.5. It is noted that there is a further live planning application (ref: PA/2025/1309) at the Country Park which is running concurrently to this planning application. PA/2025/1309 proposes the “*renovation and upgrade of existing central facilities building, including internal retrofits, and external changes to doors, fenestration and terrace features, external works including provision of disabled spaces and other associated works.*” The applications are independent of one another. Although the red lines of both applications are near to each other, they do not overlap. The reason that they are separate application is because the other application’s focus is the internal renovations and minor fenestration changes as well as changes to the layout/entrance. This application is focused on new structures/buildings and features including outdoor swimming pool facilities and therefore are materially different in nature (although the proposals subject to that application are acceptable in planning terms and should also be granted planning permission). NCC Highways consultation comments are not available for public viewing at the time of writing.

1.4.6. Seven Lakes Industrial Estate, located to the south of the Country Park, has a relatively extensive associated planning history which is summarised below:

- PA/2013/1256: for “*outline planning permission for residential development*” was granted planning permission via Appeal (ref: APP/Y2003/A/14/2221377) in October 2014. NCC as LHA responded to the planning application in November 2013 requesting that conditions be attached to any planning permission granted at the site. Queries were raised with regards to the red line boundary of the site. The Inspector’s report notes the sustainable location of the site and imposed a condition relating to a pedestrian improvement scheme which should be submitted to ensure that the site is well linked to Ealand and the railway station;
- PA/2015/0481: for “*outline planning permission for residential development*” was granted planning permission via Appeal (APP/Y2003/W/16/3145930) in July 2016. NCC as LHA responded with very similar comments to above, with the Inspector’s Report also raising similar comments to that above;
- PA/2017/855: for “*outline planning permission for residential development with all matters reserved except for access*” was granted planning permission subject to conditions in June 2022. NCC as LHA responded in August 2017 requesting that a number of conditions be attached to any planning permission granted at the site. The Decision Notice noted the sustainable location of the site; and
- PA/2017/824: for “*outline planning permission for residential development with all matters reserved except for access*” was granted planning permission subject to conditions in March 2023. NCC as LHA responded in August 2017 requesting that a number of conditions be attached to any planning permission granted at the site.

## 2. Relevant Policy and Existing Situation

### 2.1. Policy Considerations

- 2.1.1. The key transport policy documents at a national and local level have been considered when assessing the development proposals.
- 2.1.2. These documents promote development where there is a choice of sustainable transport modes such as walking, cycling and public transport. Developments that minimise the impact on the highway and rights of way network and do not have an adverse impact on the function, safety and character of the local and strategic highway will be permitted.
- 2.1.3. The policy and guidance documents considered in this report against which the application will be assessed are summarised in the sections below, split into national and local policy.

#### National Policy and Guidance

- National Planning Policy Framework (December 2024);
- Planning Practice Guidance - 'Travel Plans, Transport Assessments and Statements in Decision-Taking' (March 2014);
- National Design Guide (October 2019) and National Model Design Guide (2021);
- Manual for Streets (March 2007) and Manual for Streets 2 (2010);
- CIHT's Guidelines for Planning and Public Transport in Development (1999); and
- CIHT 'Planning for Walking' (2015) and 'Guidelines for Providing for Journeys on Foot' (2000).

#### Local Policy and Guidance

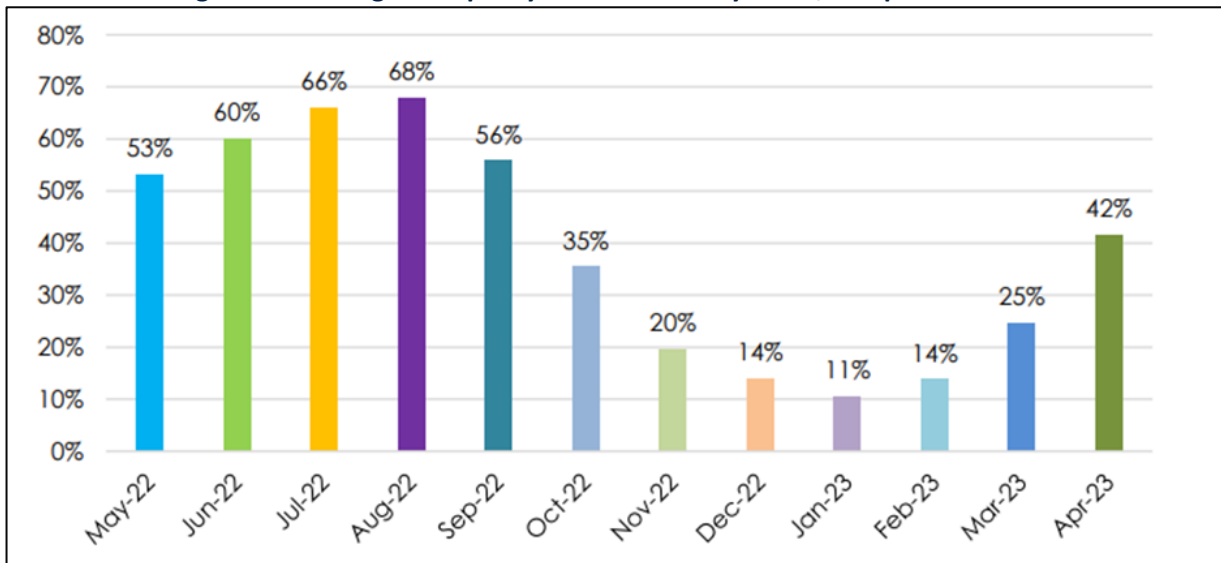
- North Lincolnshire Local Development Framework (2011);
- North Lincolnshire Core Strategy (2011); and
- North Lincolnshire Local Transport Plan (2011 – 2026).

### 2.2. Existing Site Situation

#### Existing Site Operation

- 2.2.1. As noted above, the Country Park was established as a holiday park in 2003 and now accommodates between 600 and 700 holiday homes, along with fishing lakes, recreational land and a central clubhouse and facilities. The existing central clubhouse and facilities has historically been utilised by members of the public, as well as those who are staying on-site. The existing facilities also include a bar and restaurant area which is open for public use.
- 2.2.2. In November 2022, the UK Caravan and Camping Alliance (UKCCA) commissioned Frontline Consultants Ltd (Frontline) to undertake an independent reassessment of the economic impact and benefit of holidays taken in all forms of accommodation on holiday parks and campsites in the UK. As part of this research, Frontline undertook extensive research to derive average occupancy rates of holiday parks and campsites across the UK. It was found that:
  - Average occupancy rates peaked at 68% in high season (August), falling to 53% in mid-season (May);
  - Low season average occupancy ranged from a low of 11% (January) to a high of 25% (March).
- 2.2.3. The average occupancy rates found by Frontline are illustrated in Figure 2.

**Figure 2 – Average Occupancy Rates of Holiday Parks/Campsites**



Source: Frontline Holiday Park and Campsite Operator Survey, 2023

- 2.2.4. While the Country Park has historically been closed between 2 January to 1 March, the remaining occupancy/peak months are envisaged to be similar to that of the UK average found by Frontline.
- 2.2.5. As such, and as advised by the Operator, peak season for the Country Park is generally between May and September, with July and August being the busiest months. Lower levels of occupation occur during October, November, December, March and April.

#### Local Highway Network

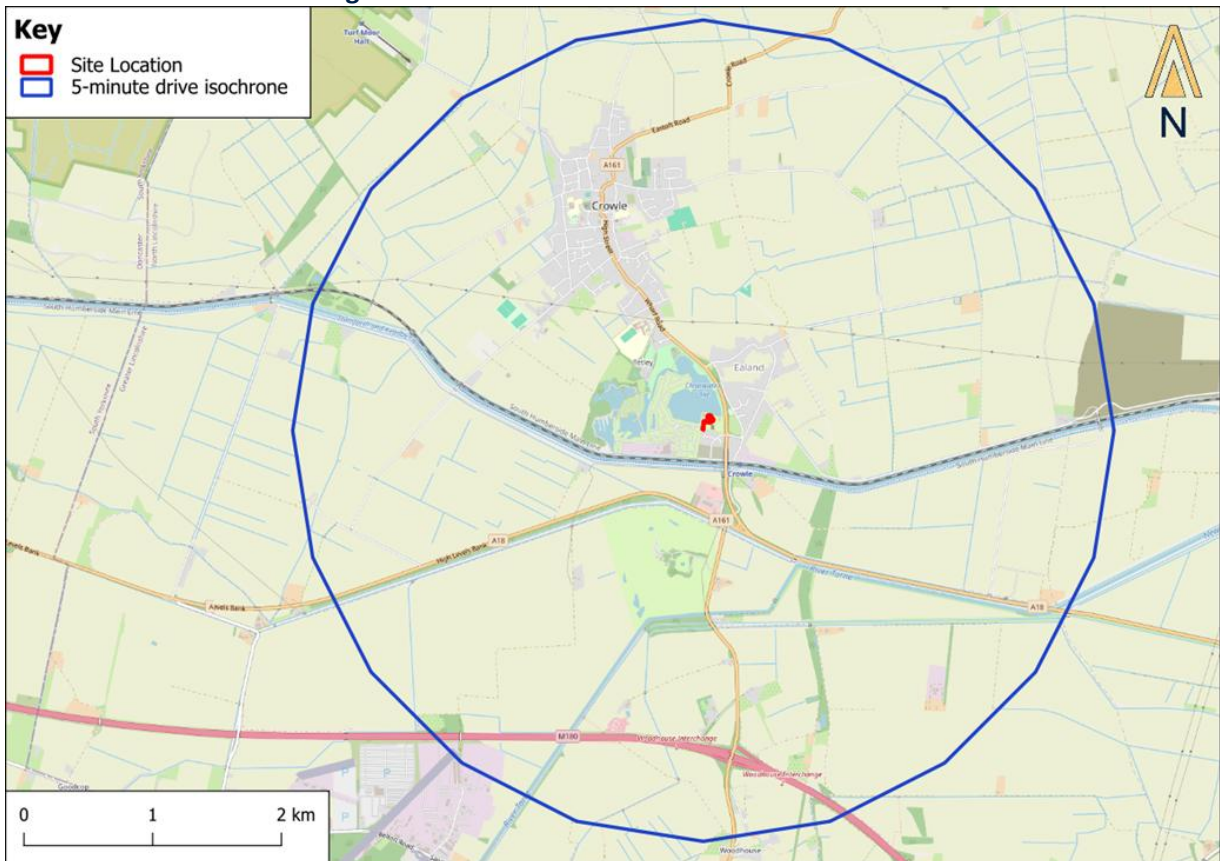
- 2.2.6. The wider Country Park is accessed via a private road off the A161 Wharf Road. A ghost island right turn lane is available at the junction, for use when accessing the site from the north, or for drivers routing towards the village of Ealand, located just under 500m from the site.
- 2.2.7. A main access road routes through the site, with a number of internal roads accessed off this linking to the on-site caravans and facilities. The application site itself is accessed off the internal main access road via a priority junction.
- 2.2.8. The A161 Wharf Road is subject to a 40mph speed limit and provides access to the village of Crowle in the north, and Belton and Epworth in the south.
- 2.2.9. A 40mph speed would require a visibility splay of 120m from a setback of 2.4m. This is considered to be achievable considering the straight nature of the A161 Wharf Road which has no impediments to visibility. It is noted that no concerns regarding the existing access with the A161 Wharf Road have been raised within the planning history outlined above.
- 2.2.10. Examples of the visibility splays from the existing access with the A161 Wharf Road are included below.

**Figure 3 – Existing Visibility Splay Examples**



- 2.2.11. Source: Google Maps However, it is of note that additional pubs / restaurants are located within Crowle and therefore the site does not serve as the only facility for residents in the area.
- 2.2.12. Figure 4 below illustrates an isochrone demonstrating the areas that can be reached within a five-minute drive of the site, based on a travel speed of 40mph. It can be seen that the local villages of Crowle and Ealand are within this area and therefore these represent potential catchment areas for local residents visiting the existing facilities. However, it is of note that additional pubs / restaurants are located within Crowle and therefore the site does not serve as the only facility for residents in the area.

**Figure 4 – Five Minute Drive Isochrone**

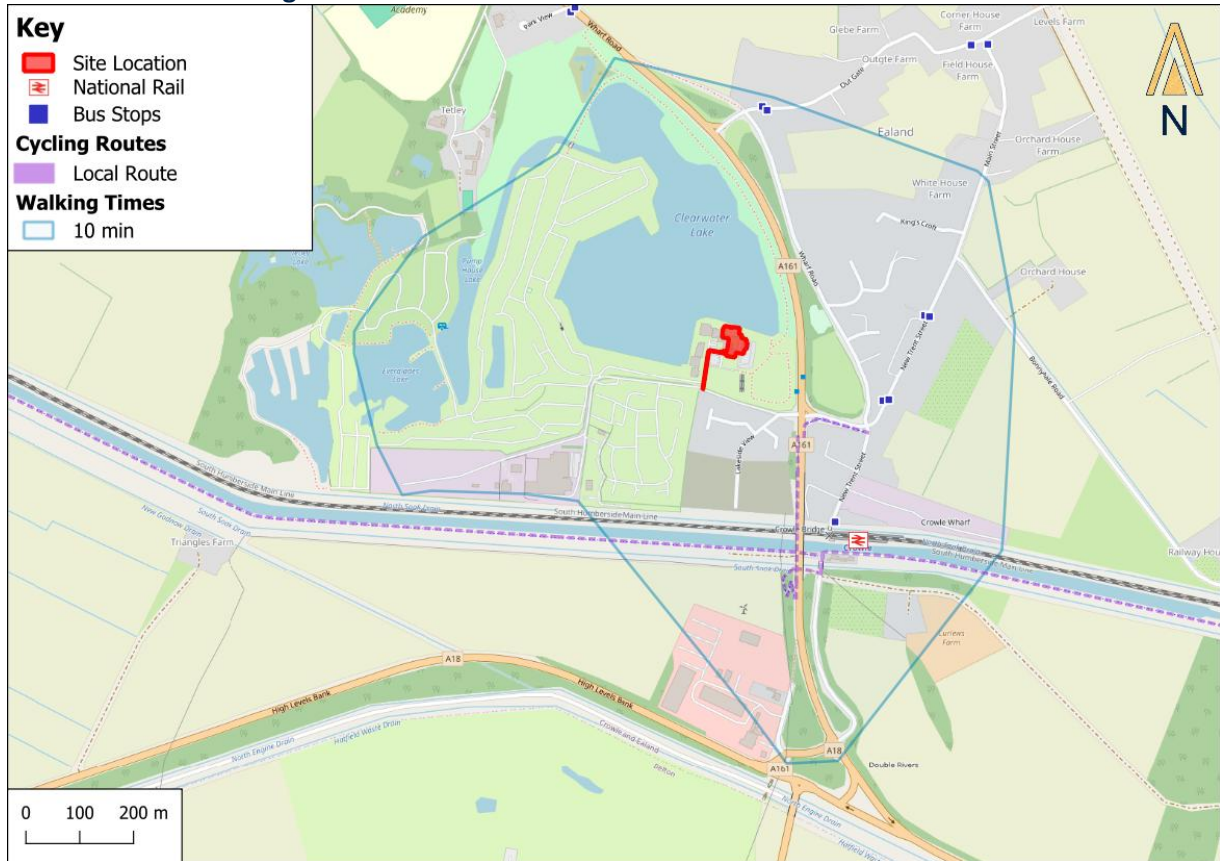


Sustainable Travel Facilities

- 2.2.13. To enable an assessment of the viability of walking and cycling between the site and key destinations in the local area it is appropriate to establish the maximum distance that people are generally prepared to walk and/or cycle and the destinations that exist within these distances.

- 2.2.14. The Chartered Institute for Highways and Transport (CIHT) guidance, 'Planning for Walking' (2015) states that 'walkable neighbourhoods are typically characterised as having a range of facilities within 10 minutes' walking distance (around 800m).
- 2.2.15. As such, Figure 5 below illustrates the areas accessible within a 10-minute walk, as well as the designated footways accessible from the site. Figure 5 also illustrates the location of bus stops and the railway station located within proximity of the site.

**Figure 5 – Sustainable Travel Facilities and Routes**



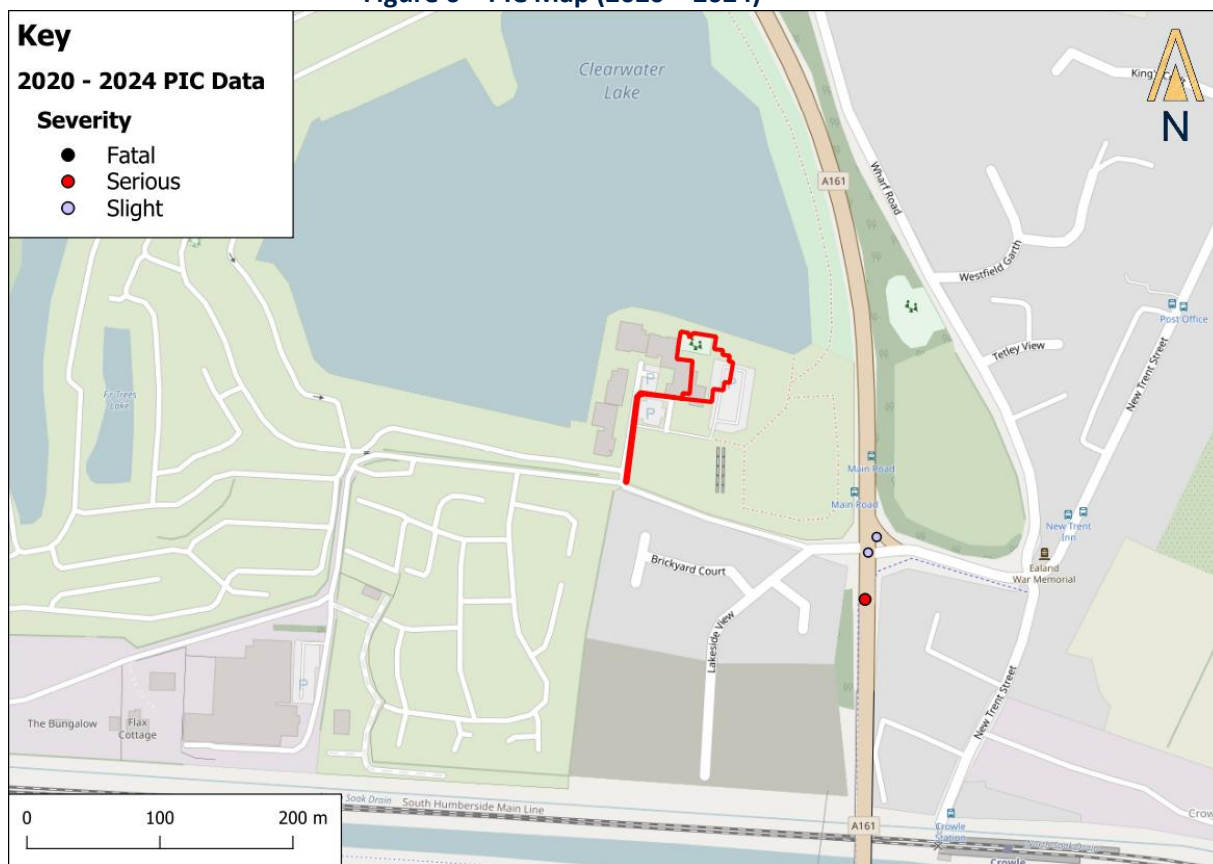
Source: QGIS, OpenStreetMap, NLC, OpenRouteService

- 2.2.16. In summary, Figure 5 demonstrates that:
- The majority of the Country Park and the southern extent of the village of Ealand is accessible within a 10-minute walk from the site;
  - A designated cycleway runs along the A161 Wharf Road to the south of the site, connecting with a route which runs parallel to the railway line and the Stainforth and Keadby Canal;
  - A number of bus stops are located within a 10-minute walk of the site, providing a service every two hours to Crowle, and further services to Goole and Eastoft;
  - Crowle Railway Station is located within a 10-minute walk of the site, providing frequent services to Doncaster, Scunthorpe, Cleethorpes and Liverpool.

Highway Safety

- 2.2.17. A review of the most recently available five-year period of Personal Injury Collision (PIC) data (2020-2024) has been undertaken on the local highway network within the immediate vicinity of the site using data supplied by the Department for Transport (DfT). The results are shown in Figure 6.

Figure 6 – PIC Map (2020 – 2024)



2.2.18. As shown in Figure 6, over the most recently available five year period of data, three collisions have occurred within the vicinity of the Country Park, centred around the access with the A161 Wharf Road. A summary of the collisions, using data made available by the DfT, is set out below:

- One collision resulted in serious injury and occurred approximately 50m south of the Country Park access with the A161 Wharf Road. This collision occurred in 2022 and involved one vehicle (a motorcycle), with no pedestrians or cyclists involved, as such it is considered isolated in nature and there are no common trends to suggest the incident occurred due to a defect in the highway layout;
- Two collisions resulted in slight injury and were located within immediate proximity of the Country Park access with the A161 Wharf Road. Of these two collisions which resulted in slight injury:
  - One occurred in 2023 and involved two vehicles, with no pedestrians or cyclists involved;
  - One occurred in 2021 and involved two vehicles, with no pedestrians or cyclists involved. The description of the collision mentions that one vehicle “skidded” into the other, inferring that weather conditions were a causation factor.

2.2.19. While any incident is regrettable, there is no identifiable clusters or statistical trends present within the recorded incidents which may be indicative of a road safety issue.

2.2.20. It is therefore considered that there are no existing road safety issues identified within the immediate vicinity of the site which may be exacerbated as a result of any future development.

### 3. Proposed Development

#### 3.1. Development Summary

- 3.1.1. As set out above, ownership of the Country Park changed hands in 2025 and the new owners would like to invest in the Country Park, increasing the quality of the central facilities to encourage higher-value ownership and to enhance the guest experience.
- 3.1.2. As such, live planning application (ref: PA/2025/1310) proposes *“upgraded and expanded central facilities complex including new stage feature/events space and amusements area, outdoor and indoor swimming pools, external play areas, and associated toilet and change facilities, plant rooms, infrastructure, landscaping and other works.”*
- 3.1.3. The proposed development ultimately comprises of the following works:
- Creation of a new outdoor and indoor pool as well as storage and plant in conjunction with pool;
  - Creation of a pool changing area and changing room;
  - Landscaped sunbed terrace;
  - Landscaped pedestrian boulevard (promenade);
  - Retained and proposed play area and relocated outdoor play swings;
  - Proposed amusement and stage area; and
  - New glazed lobby.

#### Proposed Operation

- 3.1.4. The primary purpose of the proposals is to enhance the park’s facilities, creating a better user experience for existing park members / residents. As such, the proposals will not represent a new trip attractor in its own right and will not create an increase to overall visitor numbers or generate more traffic (either internally or from externally). A breakdown of the proposals, and their intended purpose has been provided below:
- Swimming pool / sun terrace: An ancillary use to be used exclusively by residents, therefore any ‘trips’ to the facilities would be undertaken on foot by residents already staying at the Park;
  - Play area: As above, this will be an ancillary use provided on private property and will be for the use of residents of the Park, it will provide residents with additional leisure facilities and any ‘trips’ would be accommodated on foot by residents / children already staying at the Park;
  - Amusement and Stage Area: To be used by performances associated with the bar as opposed to new or separate trips; and
  - Restaurant and Bar: While part of the concurrent PA/2025/1309 application, it is important to note that this will remain open to the public, as well as being open to on-site residents. No extensions are sought to the existing license that the central facilities benefit from and therefore the proposals are not seeking to create an uplift in capacity. Vehicle trip generation associated with the bar and restaurant area will therefore remain consistent with current use at the site.
- 3.1.5. Ultimately, whilst a number of public comments raise concerns with increased traffic associated with the site, the proposals are not creating additional ‘trip attractors’ at the site, for example they are not providing a new public facility or a visitor attraction that would generate trips. All trips associated with the site would be by residents of the park (and therefore already accessing the wider site) or public trips, however this does not represent a change compared to the current operation of the site, the proposals are simply to improve and enhance user experience for residents.
- 3.1.6. Further to this, the proposals are not changing the overall number of caravan plots that are currently provided at the site, therefore the overall capacity of the site and maximum number of caravan plots

will remain as it currently is as part of this planning application. This view is shared by the LHA who state the following in their consultation response:

➤ *“The Design and Access Statement suggests that no increase in vehicular traffic is expected as a result of the proposals. However, it would be useful to know whether the facilities will be solely for the use of guests or if they will be open to the general public. If they are solely for on-site guests, then **the proposals are unlikely to lead to an increase in vehicle movements** and we would request a condition is included on any planning permission restricting usage to on-site guests. However, if they are open to the general public then this has the potential to increase vehicle movements to/from the site and more details on these would be required.”*

- 3.1.7. As noted above, the improved swimming pool, sun terrace and play area and amusement will be provided exclusively for residents. This will help to retain a positive user experience and manage overall demand. In addition, the improved facilities will likely generate longer stays by visitors, ultimately reducing overall vehicle movements.
- 3.1.8. As illustrated in Figure 4 and Figure 5, the areas that are accessible within a reasonable drive from the site (5-minutes) and within an achievable walking time from the site (10-minutes) are not densely populated and therefore members of the public who currently utilise the bar/restaurant and who will be able to continue to do so, are anticipated to be low in numbers, falling well below the demand generated by residents of the caravans during peak season and are captured within the existing license.

### **3.2. Deliveries and Servicing**

- 3.2.1. It is proposed that there will be no change to either the type, volume, or route of servicing vehicles accessing the site. Vehicles will continue to access the site from the southern access using the private access road, using the dedicated servicing area before exiting the site in forward gear.

### **3.3. Car Parking**

- 3.3.1. As a result of the proposed works, a section of the existing overflow car park is proposed to be removed. This section is minimal, with the red line boundary included on Figure 1 illustrating the small section of the overflow car park which is to be removed. However, as part of the proposals, additional parking areas are proposed, ultimately increasing the total amount of car parking spaces available in this area by 10.
- 3.3.2. Each of the caravan plots is provided with its own dedicated car parking and this is not proposed to change as part of this application.

### **3.4. Development Impact**

- 3.4.1. The proposals are provided to improve the user experience for residents and are not provided as a trip attractor in their own right. The proposals are not seeking to increase the overall capacity of the caravan park and the new facilities provided are for ancillary use for residents, whilst the restaurant and bar area will continue to operate in line with the existing arrangements (no change to licensing is proposed).
- 3.4.2. While the development proposals result in small loss of parking spaces within the overflow car parking area, additional car parking areas are proposed ultimately increasing the total amount of car parking available in this area by 10 spaces. The main car parking area will remain as existing and all caravan plots will continue to be provided with sufficient car parking. As such, there are not considered to be any traffic or highway safety issues relating to the removal of these private parking spaces.

## 4. Summary and Conclusions

- 4.1.1. Evoke has been commissioned by Unity Holidays to produce a Transport Technical Note (TTN) to support a live planning application (ref: PA/2025/1310) at Seven Lakes Country Park, Wharf Road, Crowle. The live planning application proposes “*upgraded and expanded central facilities complex including new stage feature/events space and amusements area, outdoor and indoor swimming pools, external play areas, and associated toilet and change facilities, plant rooms, infrastructure, landscaping and other works.*”
- 4.1.2. The main aim of this TTN is to respond to consultation comments raised on the application by both NCC as the LHA, and by members of the public.
- 4.1.3. NCC as the LHA requested confirmation that the facilities will be for sole use by guests or if they will be open to the general public. In response to this, it has been demonstrated that:
- The swimming pool, sun terrace and play area proposed as part of this planning application would be used exclusively by on-site residents and would not be open to members of the public. They will be an ancillary use to provide residents with additional leisure facilities and any ‘trips’ would be accommodated on foot by residents / children already staying at the Park. The improved facilities will likely generate longer stays by visitors, ultimately reducing overall vehicle movements; and
  - While part of the concurrent PA/2025/1309 application, it is important to note that the existing bar/restaurant which is proposed to be upgraded as part of this concurrent application will remain open to the public, as well as being open to on-site residents. No extensions are sought to the existing license that the central facilities benefit from and therefore the proposals are not seeking to create an uplift in capacity. Considering the low density of population within an appropriate drive/walk distance, the number of members of the public who utilise the central facilities is relatively low however is seen as an important facility for those who do utilise it. This existing situation operates safely and without negative impact to the local highway network.
- 4.1.4. Comments raised by the public include, in summary:
- Concerns regarding the safety of the access off the A161 Wharf Road with comments on “poor visibility” raised;
  - Pedestrian safety issues; and
  - Concerns regarding increases in traffic volumes.
- 4.1.5. In response to these concerns, it has been demonstrated that:
- Taking into account the planning history of the site and the surrounding area, no concerns have been raised by the LHA nor numerous Planning Inspector’s with regards to the existing operation of the site access junction with the A161 Wharf Road;
  - The site access with the A161 Wharf Road operates safely, with just three collisions occurring over the last five years of available data. There are no identifiable clusters nor statistical trends to suggest that the junction layout has a deficiency or there is an operational issue;
  - A 2.4m x 120m visibility splay would be required in line with the posted speed limit (40mph). There are no impediments to visibility along the A161 Wharf Road that would restrict this level of visibility. The lack of existing safety concerns at the access junction further confirms this;
  - Pedestrian (and cycle) infrastructure is accessible from the site, with no existing safety concerns evident (as above);
  - The proposed development will update and enhance the park’s facilities to be accessed by existing visitors and it is not anticipated to increase overall visitor numbers or generate more traffic (either internally or from externally) but offer a better quality experience; and

- The proposals are not changing the overall number of caravan plots that are currently provided at the site.

## **4.2. Conclusion**

- 4.2.1. Paragraph 116 of the NPPF states that *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”*
- 4.2.2. It has been concluded in this report that the proposed development would not result in a severe residual impact on the surrounding local highway network, nor would the proposals create an unacceptable impact on highway safety. Therefore, in accordance with the NPPF there is no transport related reason as to why this development should not be permitted.