

HYBRID PLANNING APPLICATION SEEKING FULL PLANNING PERMISSION FOR THE PART CHANGE OF USE OF THE GOLF COURSE FOR THE SITING OF CARAVANS AND OUTLINE PLANNING PERMISSION FOR THE DEVELOPMENT OF A "HUB" BUILDING CONTAINING AN ANCILLARY RECEPTION/ ACTIVITY CENTRE/ SPA (USE CLASS D2)/ RETAIL UNIT (UP TO 100SQM)/ FOOD AND BEVERAGE (USE CLASSES A1, A4 AND A5) AND FACILITIES MANAGEMENT AND ANCILLARY WORKS.

PLANNING, ECONOMICS AND DESIGN & ACCESS STATEMENT

BOSTON WEST GOLF COURSE, HUBBERTS BRIDGE, BOSTON, LINCOLNSHIRE, PE20 3QX

ON BEHALF OF BOSTON WEST LEISURE LTD

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

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 **PLANNING**  **DESIGN**  **ENVIRONMENT**  **ECONOMICS**

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1. INTRODUCTION

- 1.1 This statement has been prepared by Pegasus Group on behalf of Boston West Leisure Limited and accompanies and supports a hybrid planning application for a development (the “proposed development”) seeking full planning permission for the part change of use of the golf course for the siting of caravans and outline planning permission for the development of a “hub” building containing an ancillary reception/ activity centre/ spa (use class d2)/ retail unit (up to 100sqm)/ food and beverage (use classes a1, a4 and a5) and facilities management and ancillary works.
- 1.2 The purpose of this report is to assess the proposed development and its acceptability in planning terms; having regard to the Adopted Development Plan as well as any other consideration’s material to the determination of the application.
- 1.3 The report takes the following structure:
- **Introduction** – this provides the introductory context to the Planning Statement;
 - **The Site Proposed Development** – this presents a detailed description of the application site and its wider context and planning history;
 - **The Proposed Development** – this section provides a description of the proposed development;
 - **Design & Access Statement** – this section details the design principles through which the proposed development has been informed;
 - **Planning Policy Considerations** – this sets out the planning policies and planning guidance documents pertinent to the determination of the application;
 - **Economic Benefits of the Proposed Development** – this section presents the economic benefits of the proposed development;
 - **Principle of Development** – this establishes the principle of the proposed development;

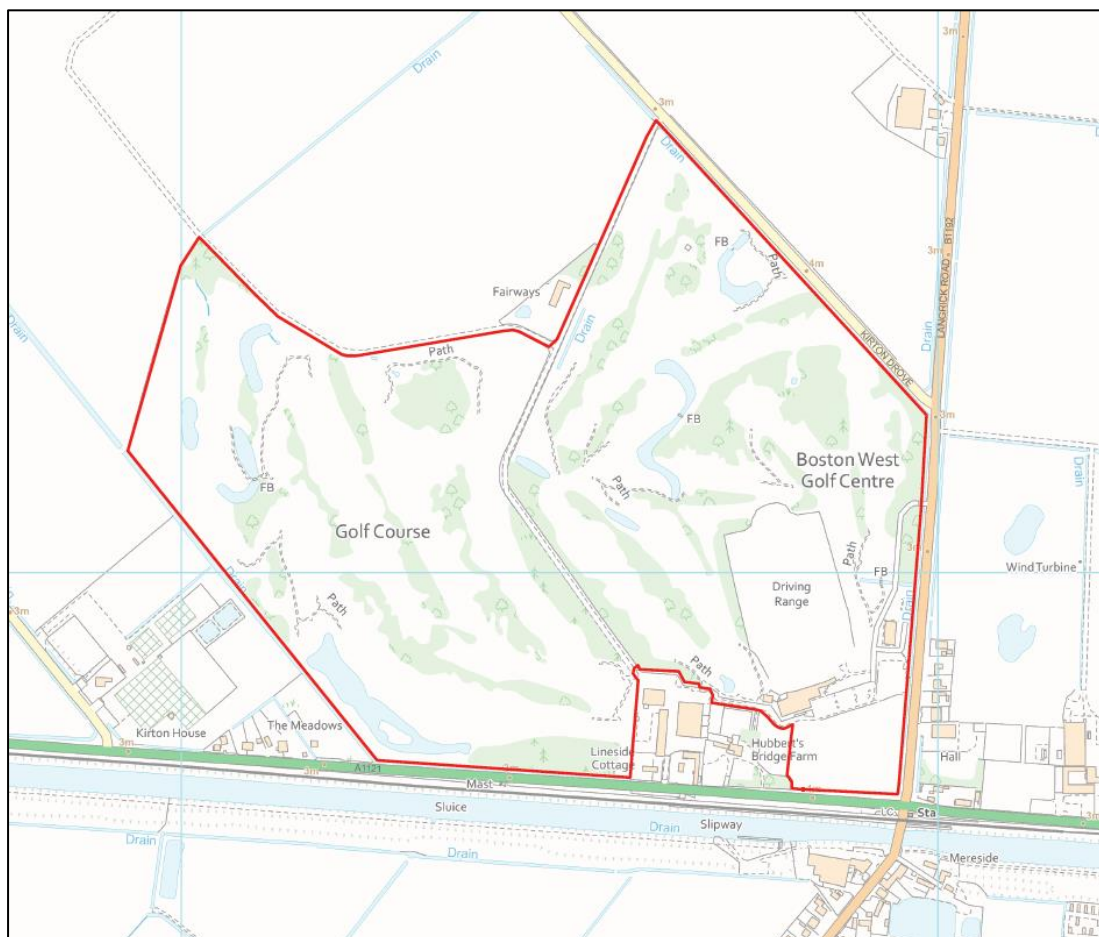
- **The Material Considerations** – this provides an assessment of the proposed development against the relevant planning policies and other material considerations;
- **Achieving Sustainable Development** – this section discusses how the proposed development achieves the three overarching objectives of the planning system and contributes towards the achieving sustainable development;
- **Conclusion** – this provides the concluding statements of the document.

2. THE SITE

2.1 This chapter of the Planning, Economics and Design & Access Statement provides a description of the application site, its wider context and planning history.

The Application Site

2.2 The application site comprises the Boston West Golf Course; a 56ha golf course located to the north of the A1121, and to the west of Langrick Road, approximately 2 miles to the west of the peripheries of Boston town, within the village of Hubbert's Bridge. As the site exists it comprises a golf course, driving range, a clubhouse which includes a restaurant and bar, a hotel, and associated infrastructure. The following image illustrates the extent of the site:



2.3 The site is surrounded by agricultural fields containing limited development to the north, east, south and west. Development in the surrounding area is largely centred around the Hubbert's Bridge crossroad, located to the south-east of the site.

Planning History

2.4 Boston West Golf Course sees an extensive planning history, the most noteworthy applications are:

- **B/99/0485** – Extensions to existing clubhouse – granted planning permission with conditions;
- **B/03/0865** – Hotel with associated parking – granted planning permission with conditions;
- **B/09/0031** – Erection of 19 holiday/golf lodges – granted planning permission with conditions; and,
- **B/17/0103** – Proposed two-storey extension to existing hotel to create 18 new hotel rooms – granted planning permission with conditions.

3. THE PROPOSED DEVELOPMENT

- 3.1 This chapter of the Planning, Economics and Design & Access Statement provides a description of the proposed development and details the design principles through which the layout has been informed.

The Proposed Development

- 3.2 The application seeks planning permission for the following proposal:

"Hybrid planning application seeking full planning permission for the part change of use of the golf course for the siting of caravans and outline planning permission for the development of a "hub" building containing an ancillary reception/ activity centre/ spa (use class d2)/ retail unit (up to 100sqm)/ food and beverage (use classes a1, a4 and a5) and facilities management and ancillary works".

- 3.3 All caravans would meet the requirements of the Caravan Act, 1968.

- 3.4 The proposed development comprises the following elements:

Full Planning Permission

- Partial change of use of the golf course to provide approximately 300 caravan pitches;
- Associated access, parking spaces and an internal road network;
- Landscaping proposals which include the reinforcement of the existing woodland located throughout the site; and,
- Sustainable drainage across the site which will include attenuation basins.

Outline Planning Permission

- The Hub Building which measures 80m X 80m X 11m, has a maximum floorspace of 12,000 sq m, and includes uses such as:
 - Reception;
 - Food and Beverage Areas;
 - Swimming Pool;

- Spa;
- Climbing Wall;
- Convenience/ Gift Shop (up to 100 sq m); and,
- Activity Kiosk.

- 3.5 The proposal is for the change of use of part of the existing golf course for the siting of approximately 300 caravans, along with the development of an associated Hub Building. The caravans will be accessed via the existing access to the B1192, Langrick Road, using an extended internal vehicular route leading from the existing car park adjacent to the golf course clubhouse. The internal road network will provide parking provisions with private parking bays serving the caravans.
- 3.6 Drawing Numbers P19-2767.006, P19-2767.008 and P19-2767.011 detail the proposed site layout. This illustrates the location of the proposed caravans on the western part of the golf course, with Hub Building to the south of the existing clubhouse. The layout shows some 300 caravan pitches with car parking and a caravan sales area that will comprise a sales/reception office within a twin unit caravan, along with two example caravans: a single unit caravan and a twin unit caravan. A small new car park is included as part of this area. The Hub Building would be located near to the existing clubhouse and would be 80m x 80m x 11m, with a maximum floorspace of 12,000m². The Hub building is to include the following elements: reception, food and beverage areas, swimming pool, spa, climbing wall, a small convenience/gift shop (up to 100sqm) and activity kiosk. However, further details of this building and its proposed facilities would be provided within a subsequent reserved matters application.
- 3.7 In order to facilitate the extended internal vehicular route leading from the existing car park to the area in which the caravans are to be sited, there would be the requirement for a minor adjustment to the configuration of two of the existing nine holes which are to be retained. In addition, there would also be the requirement for the loss of a small amount of vegetation as illustrated on Drawing Number P19-2767.009.
- 3.8 The existing mature landscape structure in the western part of the site, formed by the young trees which were planted as part of the golf course, has been used as the basis around which to develop the site layout. The caravan plots would be laid out around this existing green infrastructure wherever possible, with further

landscape proposals, including new tree planting, also included to strengthen the existing vegetation and provide a strong boundary around the site. This would serve to mitigate any potential impacts to visual amenity.

- 3.9 Occupancy of the proposed development can be restricted via planning conditions; appropriate conditions will be discussed with the Local Planning Authority during the determination of the application.
- 3.10 The details and design of the units is to be determined at a later stage; this detail can be secured via planning condition. The external appearance will be sympathetic to, and consistent with the character and appearance of the application site and its setting.

4. DESIGN AND ACCESS STATEMENT

- 4.1 The following section details the design principles which have informed the layout of the proposed development. The scheme has been carefully designed to ensure that the proposed development responds wholly to the context of the site. A Design and Access Statement is not required for a change of use application, which part of this submission entails. As such, the following relates solely to the Hub Building and Ancillary works.

Use

The proposed development would deliver high-quality caravan and tourism development, alongside a 'hub' containing a number of ancillary uses to support the caravan park as necessary.

Amount

The proposed development comprises up to 300 caravans and a hub building with up to 12,000 sqm of floorspace which would provide a reception, food and beverage area, swimming pool and spa, climbing wall, a convenience/gift shop, and an activity kiosk.

Layout

The proposed leisure hub would be set across two floors and would be sited to the south of the existing clubhouse.

Scale

Elevational details of the caravans and floorplans are to be secured via planning condition; these drawings will detail the proposed scale of the caravans. With regard to the 'hub' building, whilst all matters are reserved, the proposed leisure hub is envisaged to measure 80m X 80m X 11m and contain up to 12,000 sqm.

Landscaping

The proposals represent a landscape-led approach to the development; which allows for the proposal to assimilate sympathetically into the application site. It is proposed that the caravans and access roads will be directed to the existing fairways of the golf course, which are defined by tree coverage and therefore form discreet 'cells' of development. This approach has been adopted in the interests of

maintaining the condition of the existing sites vegetation coverage to the highest standard, for reasons of environmental sustainability, but also to help form the attraction of staying at the site by granting it a 'woodland' character.

4. PLANNING POLICY AND GUIDANCE

- 4.1 This chapter of the Planning Statement details the planning policies and planning guidance documents pertinent to the determination of the application.

Legislative Background

- 4.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the adopted development plan, unless material considerations indicate otherwise.
- 4.3 For the purposes of Section 38(6), Boston Borough Council's Adopted Development Plan comprises the South East Lincolnshire Local Plan 2011-2036, Adopted March 2019.

Adopted Development Plan: South East Lincolnshire Local Plan 2019

- 4.4 Policy 1 establishes the spatial strategy for South-East Lincolnshire and designates the application site as within the countryside; *"in the countryside, development will be permitted that is necessary to such a location and/or where it can be demonstrated that it meets the sustainable development needs of the area in terms of economic, community or environmental benefits"*.
- 4.5 Policy 2 states that developments will be permitted providing that sustainable development considerations are met.
- 4.6 Policy 3 states that all development will boast high quality design to create distinctive places; setting out criteria for how this is to be achieved.
- 4.7 Policy 4 prescribes the Council's approach to flood risk and sets out the circumstances in which development will be permitted when it is located in Flood Zones 2 or 3.
- 4.8 Policy 6 states that non-residential development of 1,000 sqm of gross floorspace or more will be expected to mitigate their impacts upon infrastructure, services and the environment to ensure that such developments are acceptable.
- 4.9 Policy 9 aims to strengthen the visitor economy. Larger scale tourism developments will only be supported outside settlement boundaries in exceptional circumstances, for instance to proportionally support or enhance the enjoyment of an established

visitor attraction where this cannot reasonably be achieved from a town or village location.

- 4.10 Policy 28 places importance on ensuring a high-quality natural environment.
- 4.11 Policy 29 aims to conserve and, where possible, enhance the historic environment.
- 4.12 Policy 30 seeks to ensure development proposals would not lead to unacceptable pollutants.
- 4.13 Policy 31 places importance on new developments responding to climate change and its impacts.
- 4.14 Policy 32 aims to promote social sustainability through improving health and wellbeing within communities.
- 4.15 Policy 33 aims to secure a more sustainable transport network, and Policy 36 aims to secure sufficient vehicle and cycle parking provision within new developments.

National Planning Policy Framework 2019

- 4.16 The National Planning Policy Framework (the “Framework”) as revised in February 2019, prescribes HM Government’s planning policies for plan-making and decision-taking in England at the local level; it is a key material consideration in all planning decisions.
- 4.17 The NPPF cites the purpose of the planning system is to contribute towards the achievement of sustainable development. Paragraph 8 of the NPPF states that to achieve sustainable development, the planning system has three interdependent overarching objectives:
 - a) *an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
 - b) *a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open*

spaces that reflect current and future needs and support communities' health, social and cultural well-being; and,

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

4.18 These overarching objectives should be achieved through the preparation and implementation of plans and the application of the policies within the NPPF. Planning policies and decisions should play an active role in guiding development towards sustainable solutions; taking account of local circumstances.

4.19 To ensure sustainable development is pursued in a positive way, at the heart of the NPPF is a presumption in favour of sustainable development.

4.20 In the case of this development proposal, the sections of the NPPF that are most relevant are:

- Chapter 5: Building a strong, competitive economy;
- Chapter 8: Promoting healthy and safe communities;
- Chapter 9: Promoting sustainable transport;
- Chapter 11: Making effective use of land;
- Chapter 12: Achieving well-designed places;
- Chapter 14: Meeting the challenge of climate change, flooding and coastal change;
- Chapter 15: Conserving and enhancing the natural environment; and,
- Chapter 16: Conserving and enhancing the historic environment.

5. ECONOMIC BENEFITS OF THE PROPOSED DEVELOPMENT

5.1 As prescribed by Paragraph 8 of the Framework, achieving sustainable development requires the planning system to have three overriding objectives: an economic objective, a social objective and an environmental objective. The economic benefits of the proposed development are therefore a key consideration in determining the acceptability of the proposed development in planning terms.

5.2 The proposed development would generate several economic benefits, while this section provides a synopsis of these benefits, the Economic Benefits Report accompanying the submission should be read to develop a broader understanding of the prevailing benefits. The proposed scheme would generate economic benefits as a result of visitor spend, economic output, and supporting permanent employment.

Visitor Spend

5.3 The proposed development is assumed to generate £4.4 million per annum, based on the average total direct spend associated with visitors staying in the caravans throughout the year.

Economic Output

5.1 Taking visitor spend as a proxy for turnover, it is possible to convert the visitor spend estimates into a gross value added (GVA) contribution, which is often used as a measure for economic output. Figures published by ONS as part of the Annual Business Survey show that GVA in the accommodation & food services sector (the sector which most closely aligns with the Holiday Park) accounts for around 52.7% of turnover. Applying this to the spend figure of £4.4million, GVA is estimated at around £2.3million per annum.

Supporting Permanent Employment

5.2 According to a Deloitte and Oxford Economics Report from November 2013 on the tourism sector, the annual visitor spend required to support a new tourist job is £54,000. As this report was published in 2013, the Bank of England's GDP Inflation Calculator has been used to calculate a more up to date estimate of £60,800, which is at 2018 prices. Dividing this into the £4.4million estimated direct visitor spend currently associated with the site gives a figure of 72 full-time equivalent (FTE) roles in the tourism sector.

- 5.3 Further to this, the proposed development would help to secure the economic vitality of the Boston West Golf Course and ensure that no jobs would be lost given the general economic trend indicating decline in the economic performance of golf courses over the UK.

Economic Benefits Summary

- 5.4 Overall, the proposed development would boast significant economic benefits, and should therefore be considered to achieve the economic objective of the planning system; which plays a role in achieving sustainable development. Significant weight should be given to this in the determination of the planning application.

6. THE PRINCIPLE OF DEVELOPMENT

- 6.1 Policy 1, Policy 4 and Policy 9 of the South-East Lincolnshire Local Plan 2019 are considered important in establishing the principle of tourism development in the open countryside.
- 6.2 Policy 1 prescribes the spatial strategy for South-East Lincolnshire and aims to direct development to the most sustainable locations. The majority of new development will be located in sub-regional centres (which includes Boston) and main service centres, and only a limited amount of development will be delivered in minor service centres. Development will be restricted outside of these areas and in the countryside.
- 6.3 The application site is located within open countryside as per the South-East Lincolnshire Policies Map. Policy 1(D) states that *"in the countryside development will be permitted that is necessary to such a location and/or where it can be demonstrated that it meets the sustainable development needs of the area in terms of economic, community or environmental benefits"*. The proposed development is wholly necessary to its location for numerous reasons which are to be discussed in the following paragraphs.
- 6.4 Firstly, the proposal would provide economic support to an existing leisure site. Golf Courses are often in economic decline, and the Boston West Golf Course is no exception to this, although the applicants have begun to operate the facilities within the site in a more commercially viable manner. The proposed development would enable the diversification of the Boston West Golf Course through providing tourism facilities which would not only significantly boost the economic performance of the existing site and help to secure its long-term vitality, but also play a role in boosting the tourism sector in South-East Lincolnshire, as discussed in detail in the Economic Benefits Report accompanying the submission.
- 6.5 Further to this, as the site exists it lends itself appropriately to accommodate the proposed development which has been sensitively integrated into the site, as a result of the sites vision which would see holiday units set within a woodland setting, located in the open countryside. Furthermore, the location of the proposed development lends itself appropriately to the proposed use given the scale of the site which allows for it to effectively accommodate the development at its proposed scale.

- 6.6 For the reasons concluded above, the proposed development is necessary for its location and therefore complies with Policy 1(D) of the South-East Lincolnshire Local Plan.
- 6.7 The proposed development would further comply with Policy 1(D) given that it would help to meet the sustainable development needs of the area through the economic and environmental benefits which would prevail. The proposed development would boast significant economic benefits (as discussed within the Economic Benefits Report), and would help to preserve and enhance the natural environment of the site by reason of the proposed layout which sensitively integrates the development into the site, and the proposed landscaping scheme which helps to enhance the natural environment.
- 6.8 Policy 4 sets out the approach to flood risk for South-East Lincolnshire and sets out circumstances for when development proposals within Flood Zones 2 and 3 will be permitted.
- 6.9 Policy 4(1) requires development proposals within Flood Zones 2 or 3 to pass the sequential test. As demonstrated within the above paragraphs, there is a specific requirement for the development at the proposed location; predominantly due to the fact that the development proposal will diversify an existing leisure site and is required to support the existing business and secure its economic vitality. It is on this basis that it is considered the development proposal passes the sequential test and accords with Policy 4(1).
- 6.10 The Flood Risk and Drainage Assessment accompanying the submission demonstrates the compliance of the proposed development to the remaining criteria of Policy 4. The Flood Risk and Drainage Assessment concludes that the proposed development would not be at an unacceptable risk of fluvial or tidal flooding, as such, the proposed development accords with Policy 4 and can be considered acceptable in principle.
- 6.11 Policy 9 aims to promote a stronger visitor economy in South-East Lincolnshire and is therefore a key policy for determining the principle of the proposed development.
- 6.12 Policy 9 states that outside settlement boundaries, large-scale developments which aim to support the visitor economy will only be supported only in exceptional circumstances, such as *"to proportionally support or enhance the enjoyment of an*

established visitor attraction where this cannot reasonably be achieved from a town or village location”.

- 6.13 The proposed development would support and enhance the enjoyment of Boston West Golf Course. As previously mentioned, the proposal would aid in diversify the current use of the site and as a result help to boost its economic performance and support its longevity. The proposal therefore supports and enhances the existing Boston West Golf Course and can therefore be considered ‘exceptional circumstances’ in accordance with Policy 9. Whilst it is appreciated a portion of the golf course will be lost, the golf course would retain 9-holes as well as a driving range but would also see diversification as a result of the proposed uses; helping to enhance the sites facilities and general attraction. Increased ‘footfall’ at the site will result in increased probability for tourists to use the golf course and driving range.
- 6.14 It has been previously discussed that the proposed development could not be reasonably achieved from a town or village location. As discussed, the proposed development would provide necessary economic support and enhance the existing use of the site, and is well suited to the site given the scale of the site and the proposed development, and the fact that the proposed development has been sympathetically integrated into the site to make best use of the site to help form the attraction of holidaying at the site e.g. the woodland setting located within open countryside. As such, the proposal would comply with Policy 9 of the South-East Lincolnshire Local Plan 2019.
- 6.15 Overall, as a result of the conclusions drawn, the proposed development would accord with Policies 1, 4 and 9 of the South-East Lincolnshire Local Plan 2019 and can be considered as acceptable in principle. The application seeking outline planning permission should therefore be approved. While the application seeking full planning permission can be considered acceptable in principle, there are other material considerations pertinent to the determination of the application, which are to be discussed in the following section.

7. THE MATERIAL CONSIDERATIONS

7.1 The following section addresses the key issues which are likely to arise during the course of the application seeking full planning permission, these include:

- Economic Benefits (See Section 5);
- Landscape and Visual Impact;
- Heritage Impacts;
- Amenity;
- Transport and Highways Impacts;
- Ecology, Biodiversity and Trees;
- Flood Risk and Drainage Considerations;

Landscape and Visual Impact

7.2 Policy 3 states that all development will boast high quality design to create distinctive places; setting out criteria for how this is to be achieved. Amongst other things, development proposals will be required to demonstrate that the landscape character of the location would be maintained (Policy 3(3)).

7.3 A Landscape and Visual Appraisal (LVA) has been prepared in support of the application. The LVA considers the potential effects of the indicative proposals upon individual landscape features and elements, landscape character, and visual amenity and the people who view the landscape.

7.4 With regard to landscape effects of the proposed development, the LVA concludes that *"there would be an inevitable effect on the land use and landscape character of the site itself as a consequence of the proposed development due to the loss of part of the golf course and practice greens, however, much of the sites green infrastructure would be retained surrounding the development proposals. As a result of the landscape mitigation proposals and the careful retention of existing features, there would be beneficial effects upon vegetation and water features in the longer term"*.

7.5 With regard to the visual effects of the proposed development, the LVA concludes that *"any views of the development from publicly accessible locations would be*

localised and limited to adjacent roads, railway line and limited number of public footpaths. Due to the proximity of development proposals there would be moderate adverse effects from the adjacent A1121, the railway line and from the public footpath south of the South Forty Foot Drain. However, with the benefit of landscape mitigation around the periphery of the site, visual effects would reduce. Whilst there would be some limited changes to the private visual amenity of a small number of local properties along rural roads close to the site, in the longer term, the effect upon visual amenity is likely to reduce, as new and existing vegetation within the site grows and establishes”.

- 7.6 The LVA concludes that *“any effects on landscape character and features as a result of the proposed development would be confined to the site and immediate surrounding areas with visual effects reduced by the proposed mitigation planting. Overall the total extent of the landscape and visual effects would be localised and limited in nature and which would reduce in the longer term as proposed landscape mitigation planting establishes and integrates the development”.*
- 7.7 As such, it is considered that the proposed development would have no significant unacceptable impacts to the landscape character surrounding the site; and therefore, accords with Policy 3(3).

Heritage Impacts

- 7.8 Policy 29 aims to conserve and, where possible, enhance the historic environment and is reflective of Chapter 16 of the Framework.
- 7.9 The application site is not located within a conservation, and contains no Listed Buildings, however, is located within the setting of designated heritage assets comprising three no. Grade II Listed Buildings, which can be identified as:
- Hubbert’s Bridge Farmhouse (NHLE ref. 1232947);
 - Barn to Hubbert’s Bridge Farm (NHLE ref. 1165111);
 - Kitchen Garden Wall to Hubbert’s Bridge Farmhouse (NHLE ref. 1360495);
- 7.10 A Heritage Statement supports and accompanies the planning application submission and provides details of the application site and the surrounding with regard to heritage and undertakes a setting assessment for the designated heritage assets identified above.

- 7.11 While the Heritage Statement should be read in full, the concluding statements read:

"The proposed development site is not considered to contribute towards the heritage significance of Hubbert's Bridge Farmhouse Grade II Listed Building. Caravan development within the western extent of the Boston West Golf Course would not be anticipated to result in any harm to the heritage significance of this asset. Development to the east of the farmhouse may be visible, although heavily screened by planting. Any such development would not be anticipated to result in any harm to the heritage significance of the farmhouse".

"Intervisibility between the site and Grade II Listed Barn to Hubbert's Bridge Farmhouse is entirely screened by industrial, agricultural and residential development. Development within the site would likely be wholly inappreciable from barn and therefore development would not have any impact upon the heritage significance of the asset".

"The Kitchen Garden Wall to Hubbert's Bridge Farmhouse is also a Grade II Listed Building. The proposed access for the development would pass adjacent to the distinctive crinkle crankle wall and better reveal the heritage significance of the Grade II Listed wall. Any development to the north of the wall may be visible from the wall but would not be considered harmful to its heritage significance".

- 7.12 Given the conclusions drawn from the Heritage Statement, the proposed development is considered to comply with Policy 29 of the South-East Lincolnshire Local Plan 2019, and Chapter 16 of the Framework 2019.

Amenity

- 7.13 Caravans, by nature, are not overly large; thereby reducing the potential for issues of overlooking and overshadowing to result, or for the caravans to have any overbearing impact to existing surrounding occupiers.
- 7.14 Given that there will be an increase in visitors to the site as a result of the proposed development noise levels will inevitably increase, however levels are not considered to increase by any significant margins primarily given the nature of the sites uses,

which are not at all anti-social. The proposed site layout plan indicates there will be a reasonable distance between the proposed development and existing surrounding occupiers, which will aid in alleviating any increases in noise. Further to this, the trees which encompass the 'development cells', and the vegetation which bounds the site would act as a screen for any increases in noise; significantly reducing the impact of the proposed development.

- 7.15 Overall, the proposed development is considered to respect the amenity of existing occupiers which surround the site; in accordance with Policy 30
- 7.16 The layout of the proposed development has been informed by the Boston Borough Council Caravan Site Licence Conditions which prescribes standards for holiday sites. Amongst other things, the document prescribes the distances between caravans. The layout of the proposed development reflects the standards, and so it is considered that all caravans will be positioned acceptably in relation to each other; this is considered to avoid any issues which would prevent occupiers of the site from having a reasonable standard of amenity; in accordance with Policy 30.

Transport and Highway Impacts

- 7.17 A Transport Assessment accompanies this submission. The Transport Assessment reviews the transport and highway impacts associated with the proposed development.
- 7.18 The Transport Assessment concludes the following:

"Safe and appropriate access can be provided to serve the scheme for all modes of travel. [...] the internal layout and parking provision will be safe and appropriate for staff and customers".

"Additional vehicle trips associated with the redevelopment will not be material and that it will not have any significant impact on the safety or operation of the local highway network".

"There are no valid highway or transportation reasons which should prevent the proposed development".

- 7.19 Overall, the Transport Assessment demonstrates that there is sufficient capacity in the local highway network to cope with the additional trips generated by the proposed development and that highway safety would be preserved. As such, the

proposed development therefore complies with Policy 33 of the South-East Lincolnshire Local Plan 2019.

Ecology, Biodiversity and Trees

7.20 The Framework identifies that the planning system should contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity.

7.21 The application is supported by an Ecology and Protected Species Survey, which concludes:

"No ecological constraints were found to be associated with plans to develop this land.

Some precautionary measures and ecological enhancements are required in order to ensure legal compliance and no net loss to biodiversity. These are as follows:

- Best practice in relation to bats and lighting;*
- Vigilance and best practice regarding badgers and other ground mammals;*
- Appropriate timing with regards to nesting birds;*
- Provision of bird nest boxes; and,*
- Provision of bat boxes".*

It is considered the above can be secured via planning condition.

7.22 In addition to the above, the proposed development would see a landscaping scheme including reinforcement tree planting, and the creation of attenuation ponds which would create new habitats and help to attract wildlife and secure net gains in biodiversity. As such, the proposed development would comply with Policy 28 of the South-East Lincolnshire Local Plan 2019, as well as Chapter 15 of the Framework 2019.

Flood Risk and Drainage Considerations

- 7.23 A Flood Risk and Drainage Report accompanies the submission and provides details on tidal and fluvial flooding and this impact this would have to the proposed development, and the foul sewage system to be employed on site.
- 7.24 The Flood Risk and Drainage Report concludes the following regarding tidal and fluvial flooding:

"The site does have the protection of both tidal and fluvial flood defences which are well maintained by the Environment Agency. The Lincolnshire & Northamptonshire Area Tidal Hazard Maps show that the site for the proposed development is not affected from tidal flooding both for the present day and after the commissioning of the Boston Barrage, for scenario year 2115, from a 1 in 1000-year event including climate change";

"The proposal is to erect 300 caravans with access roads, with the ground floor level to be raised 500mm above the natural ground level to a minimum of 3.00mODN";

"A simple breach analysis for both the River Witham and the South Forty Foot Drain shows that the minimum floor level is 450mm above the predicted breach flood level";

"The proposed leisure use falls within the "More Vulnerable" uses of land as defined in Table 2 NPPF for Flood Risk Vulnerability Classification and the proposed development for residential use are appropriate in Flood Zone 3 subject to a Flood Warning and evacuation plan";

"A flood Warning and Evacuation plan will be prepared";

"It is proposed to utilise infiltration techniques to reduce the storm water discharge from the proposed development to minimise the impact of the development on the surrounding area";

"Flooding from other sources is unlikely to affect the site"; and,

"The surface water drainage system and the access road shall be managed and maintained by the site management company".

- 7.25 With regards to the foul water drainage strategy, it is proposed that Package Treatment Units will be installed in site, with 1 unit serving 30 caravans, in the absence of public sewers in close proximity to the site.
- 7.26 Overall, it is considered that the proposed development would not be at unacceptable risk from flooding and would, with the aid of suitable worded planning conditions, comply with Policy 4 of the South-East Lincolnshire Local Plan 2019, and Chapter 14 of the Framework.

8. ACHIEVING SUSTAINABLE DEVELOPMENT

8.1 Paragraph 7 of the Framework states that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 of the Framework states that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways. The objectives being an economic objective, a social objective and an environmental objective.

8.2 It is considered that there are economic, social, and environmental benefits to this development which weights significantly in favour of approving this scheme. This view is supported by the relevant policies of both the South-East Lincolnshire Local Plan 2019 and the Framework 2019.

Achieving the Economic Objective

8.3 A synopsis of the economic benefit of the proposed development is set out in Section 5 of this Planning and Design & Access Statement, full details are found with in the Economic Benefits Report which accompanies the submission.

8.4 In summary, the proposed development would see an estimated spend of **£4.4 million per annum**, would result in a GVA figure of **£2.3 million per annum**, and would support **72 FTE** roles in the tourism sector.

8.5 The proposed development therefore contributes towards achieving sustainable development via its economic benefits.

Achieving Social Objective

8.6 The development of this site would contribute to the delivery of tourist accommodation in the District as well as providing new employment opportunities for local residents. The proposed development would therefore contribute towards achieving sustainable development through its social benefits.

Achieving the Environmental Objective

8.7 The proposal brings the opportunity to provide significant benefits to the surrounding environment. The improvements through the submitted landscape masterplan would provide landscape benefits as part of a well-designed and visually appealing scheme. The scheme will retain existing vegetation and incorporate substantial levels of new planting and landscaping to enhance vegetation across

the site. This ensures that the existing vegetation on site will not only continue to contribute but will be enhanced.

8.8 The proposed development presents opportunities for significant habitat enhancements which will result in a 'biodiversity net gain' in accordance with NPPF and Local Planning Policy.

8.9 It is on this basis which the proposed development would help achieve sustainable development through the environmental benefits prevailing.

9. CONCLUSION

9.1 This chapter provides the concluding statements of the Planning, Economics and Design & Access Statement.

9.2 Alongside the submitted drawings and accompanying reports, this statement has assessed the proposal against the content of the Development Plan and the advice provided by the Government through planning policy guidance and statements.

9.3 In summary, the proposed development is considered to be acceptable in planning terms, and suitable for the grant of planning permission, both in outline and in full, for the following reasons:

- The proposed development has been demonstrated to be acceptable in principle by reason of the compliance with Policy 1 and Policy 9 of the South-East Lincolnshire Local Plan 2019.
- The proposed development would boast significant economic benefits as a result of the estimated visitor spend of £4.4 million per annum and the GVA figure of £2.3 million per annum, which would help to support 72 FTE roles in the tourism sector.
- The Landscape and Visual Assessment in support of the proposed development determines that the effect of the proposed development on landscape character and features would be confined to the site and immediate surrounding areas and the harm would be reduced through the proposed mitigation planting, resulting in no unacceptable harm.
- The Heritage Statement in support of the proposed development has determined the proposed development would not result in any harm to the heritage significance of the Grade II Listed Hubbert's Bridge Farmhouse and the Grade II Listed barn associated with this building, and would better reveal the heritage significance of the Grade II Listed wall.
- The proposed development would not give rise to any amenity issues; either for existing occupiers surrounding the property or for the future occupants of the holiday site.
- The proposed development would not result in any unacceptable harm to the highway network as it has been demonstrated that there is sufficient capacity in the local highway network to cope with the additional trips

generated by the proposed development, which would ensure highway safety is preserved.

- The proposed development would preserve the existing environment to a high-standard and would see the creation of new habitats as a result of the proposed landscaping scheme which would result in net gains in biodiversity.
- It has been demonstrated that the proposed development would not be at an unacceptable risk of tidal or fluvial flooding, and that an adequate foul water drainage strategy can be employed on site.

9.4 To conclude, this statement has demonstrated that the proposals will deliver high-quality and sustainable tourism development in a manner which will respect the site and its setting. The proposed development would secure net gains across the three overarching objectives of the planning system; economic, social and environmental objectives, and therefore contributes towards the achievement of sustainable development.

9.5 It has been demonstrated that the proposed development accords with the adopted Development Plan and the key material considerations as per the Framework 2019. The proposed development is therefore acceptable in planning terms and suitable for the grant of planning permission. Boston Borough Council are therefore respectfully requested that the proposed development be granted planning permission.