

003.BG/P19-2767

VIA EMAIL ONLY

28th April 2020

Dear Mr Gildersleeves,

Re: B/19/0520 | Boston West Golf Course

I write in respect of the planning application detailed above, following the initial consultation period. This letter and the supporting documents enclosed aim to address matters raised by local planning authority and statutory consultees.

Environment Agency

The Environment Agency have objected to the proposal and have requested that the application be refused on the following ground:

"Private sewage treatment facilities should only be used where it is not reasonable for a development to be connected to a public sewer, because of the greater risk of failures leading to pollution of the water environment posed by private sewerage systems compared to public sewerage systems".

It has been advised that to overcome the objection, a thorough investigation is required regarding the potential of connecting to the public foul sewer. If the connection is feasible, the proposals must be amended to show this, and if this is not feasible; this must be evidenced.

Enclosed with this letter are the following documents:

- RM Associates Covering Letter;
- Anglian Water Pre-Planning Report;
- Foul Drainage Assessment Form; and,

Pegasus Group

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

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- Email from Mark Rhodes, Anglian Water, dated 15/04/2020.

Through the letter and the pre-planning report, it has been demonstrated that the closest 225mm sewer to the site is located 3.91km away. The email from Mark Rhodes, Anglian Water 15/04/2020 estimates the capital cost for a new pumping station and rising main from the site to the nearest accessible foul water sewer of the same size or greater pipe diameter required to drain the site is £1,104,481.38.

The Planning Practice Guidance (ref. ID-34-020-20140306) advises:

"Septic tanks or package sewage treatment plants may only be considered if it can be clearly demonstrated by the applicant that discharging into a public sewer is not feasible (taking into account cost and/or practicability and whether the package treatment plant poses a risk to a designated site) in accordance with Approved Document H of the Building Regulations 2010. Septic tanks must not discharge effluent to surface water and must comply with the general binding rules, or a permit will be required".

The fact that the closest 225mm public sewer is located 3.91km away from the application site poses a logistical challenge to the proposed development; one with a severe and unviable cost implication associated with it. Taking the Planning Practice Guidance into account, connecting to the public sewer would be unfeasible, and the proposed on-site package treatment units works as a viable solution to accommodate the proposed development.

Historic Conservation

The Historic Conservation Advisor has raised strong concerns with the proposed development.

Firstly, it should be reiterated that the planning application seeks full planning permission for the partial change of use of the existing golf course for the siting of up to 300 caravans, and outline planning permission for the development of a hub building, where the matters of appearance, landscaping, layout and scale are reserved for future consideration.

While Pegasus Group have provided an illustrative masterplan to show how the proposed hub building could be accommodated on-site, alongside an indication that the proposed hub building

could be a maximum of 80m in width, 80m in length, and 11m in height, these details are purely indicative and would be established within any future application for reserved matters.

Pegasus Group remain of the opinion the proposed development would result in no heritage harm; in accordance with the conclusions of the heritage assessment, and dispute matters raised by the Historic Conservation Advisor. Firstly, Pegasus are concerned that on the basis that details of the hub building remain indicative, the Advisor has made assumptions regarding the design of the hub building; comments such as: 'extremely large hub building' and 'large incongruous feature' confirm this. Pegasus Group further dispute the matters raised, including the impact of the proposed development to the '*experience of passing through the area*' when the area surrounding the application site is not a historic landscape.

Pegasus Group met with the Historic Conservation Advisor on 24/04/2020 to seek clarification on the concerns raised with the proposed development. During the meeting, it was reminded that details of the appearance, landscaping, layout and scale of the proposed hub building were reserved for future consideration, and that at this stage, the key consideration is whether the principle of the hub building is acceptable. The principle of the hub building was discussed during the meeting, and the Advisor agreed the proposed hub building would not be unacceptable in principle, however stated that strict conditions should be imposed on any planning permission to control its overall design. Additionally, during the meeting the Advisor stated that the conclusions of the heritage statement were agreed with, with regard to the impact to designated heritage assets, however it was found that the Advisor continued to have reservations regarding the impact to non-designated buildings in the wider surrounding area.

In an attempt to alleviate the Advisor's concerns regarding the hub building as indicated, irrespective of the fact it is only illustrative, Pegasus Group have prepared a revised masterplan to illustrate another way in which the proposed development could be accommodated on-site. The revised masterplan indicates two hub buildings, positioned further in-site, more closely related to existing buildings, with increased planting. Pegasus Group has also provided a collection of images which it is envisaged the design of the proposed hub building would take inspiration from. These images feature timber cladding which is considered to be an appropriate material to ensure the proposed development assimilates most effectively into the application site.

Enclosed with this letter are the following plans:

- P19-2767.007C Illustrative Site Layout Plan;
- P19-2767.008C Illustrative Site Layout – South Eastern Enlargement; and,
- Illustrative Hub Building Designs.

Environmental Health

It is noted the Environmental Health Officer (EHO) requires details of Electric Vehicle (EV) charging points. The applicant agrees to submit details of EV charging points as part of any future application for reserved matters.

Further to this, the EHO require details of the proposed opening hours for all uses within the site. The following table indicates the opening hours for each propose use.

	Proposed Opening Hours		
Proposed Use	Monday – Friday	Saturdays	Sundays and Bank Holidays
Retail unit (Use Class A1)	07:00 – 19:00	07:00 – 19:00	08:00 – 18:00
Bar (Use Class A4)	12:00 – 12:00	12:00 – 01:00	12:00 – 22:00
Restaurant (Use Class A3)	07:00 – 22:00	07:00 – 22:00	07:00 – 22:00
Leisure Uses (D2)	08:00 – 18:00	08:00 – 18:00	08:00 – 18:00

It is noted the EHO requests further information regarding the overarching management principles of the proposed development, as such, a document containing the basic management principles has been prepared to give an indication of how the site will be managed

Arboriculture

The Arboricultural consultant requested a full BS5837: 2012 Tree Survey and Report, this accompanies and supports the letter. Given the large number of trees within the application site, the Tree Survey was undertaken using a methodology which was agreed between the applicants and the Council's appointed Arboricultural Consultant.

Following an initial review of the tree survey, the Arboricultural Consultant requested minor amendments to the proposed masterplan to reduce the impact to category B trees and minimise the removal of these trees. Plan ref. P19-2767.007C illustrates the amendments and is enclosed for the Arboricultural Consultants consideration.

Heritage Lincolnshire

Heritage Lincolnshire state that the site has potential for archaeological remains and recommend a scheme of archaeological work is secured to determine the presence and character of archaeological remains.

The proposed caravan holiday homes are to be sited on a permanent hardstanding to provide adequate support for the unit. The good practice published by the National Caravan Council and British Holiday & Home Parks Association states that a hardcore base should be to a minimum depth of 150mm and topped with 100mm of concrete with steel reinforcement. As per the guidance, the proposed caravans would only see ground intrusive works to a depth of approximately 150mm. The modest nature of the ground intrusive works for the proposed caravans minimises the potential of finding archaeology, accordingly, trial trenching for the proposed caravan units is not considered to be a reasonable request. It is considered the presence of an archaeologist whilst undertaking these minor ground intrusive works would be more reasonable.

The proposed hub building(s) would see more significant ground intrusive works by way of the fact it is a larger scale building(s). On this basis, given the fact that the site has potential for archaeological remains, the applicant agrees to securing a scheme of archaeological work for the hub building to determine the presence and character of archaeological remains. Given that the hub building is in outline form currently, it is suggested a Written Scheme of Investigation is a conditional requirement of any subsequent reserved matters application, and the proposed methodology of archaeology fieldwork is implemented prior to the commencement of development. The local planning authority are invited to impose conditions to this effect on any planning permission should it be granted.

Sport England and England Golf

Sport England raised two issues with the planning application: the loss of part of the existing golf course, and the creation of additional sports facilities.

A viability and needs assessment of the existing Boston West Golf Course accompanies and supports the letter; this has been prepared in consultation with England Golf.

This letter is also accompanied by an email from Matthew Draper, England Golf which states:

"Given the current situation with Boston West being a disaffiliated facility, we would support a project that aims to reinvigorate the facility from a golf perspective. The initial plan to reduce the course to 9 holes produces an opportunity to provide shorter, different formats of the game, in line with our 'Ways to Play' guidelines, that could attract and introduce new people to the game from in and around the Boston area. We would hope to see that the remaining 9 holes would receive some improvements and be maintained to a standard that is attractive to any golfer, plus see additional upgrading of the driving range and practice facilities that are absolutely key in attracting new golfers, connecting with and enticing the local community (of which Boston has a young demographic in relation to Lincolnshire as a whole) and providing a quality golf facility".

Natural England

Part of the application site falls within the outermost Impact Risk Zone for The Wash Site of Special Scientific Interest (SSSI). Natural England requested an assessment of the likely impacts of the proposed development to the following topics:

- Foul Sewage;
- Surface Water; and,
- Birds.

Enclosed is an Ecological Assessment written by Wright Environmental Limited. This report provides the appropriate assessment and concludes that the Proposed Development and the development of Hub facility are not expected to negatively impact The Wash designated site or its qualifying habitats and species.

Ecology Consultant

The Council's appointed ecology consultant requests further investigative work is undertaken to allow for a robust assessment of the proposed development's impact to ecology. Enclosed within the letter is an Ecology and Protected Species Survey.

The applicant is currently in the process of commissioning eDNA testing of waterbodies deemed suitable to support Great Crested Newts, and water vole surveys of drains to determine the presence of water vole. Findings will be issued to the Council for consideration upon receipt.

Lincolnshire County Council Highways

The applicant has agreed to pay the planning obligations required to mitigate the traffic impact of the proposed development; amounting to a contribution of £5,000 per annum (for a period of 5 years maximum), to support the CallConnect bus service in the interest of encouraging sustainable transport.

Planning Officer Queries

The Planning Officer has queried the extent of the site subject to the change of use. Plan ref. P19-2767.015 illustrates the extent of the change of use.

The Planning Officer had queried the total site area, the application site measures approximately 56.6ha.

The proposed development units will comprise of a mixture of privately-owned units and holiday lets, with the majority of units being privately owned. The proposed caravans will be occupied year-round, however will be restricted to prevent caravans from becoming permanent residential dwellings, should the Local Planning Authority be minded to grant planning permission the following three conditions are suggested:

- **Condition** – The caravans on the site shall be occupied for holiday purposes only and no caravan shall be occupied on a permanent basis.

- **Condition** – The caravans shall not be occupied as a person's sole or main place of residence.
- **Condition** – The site owners and/or operators shall maintain an up-to-date register of the names of all owners and/or occupiers of individual caravans on the site, and of their main home addresses, and shall make this information available at all reasonable times to the local authority.

The overarching management principles document details these rules and can be used for the basis of any required planning obligations, should the Local Planning Authority be minded to grant planning permission.

The Planning Officer requests further details regarding the design of the caravans. The proposed masterplan details the single units would be 3.7m in width and 12.5m in length, and the lodges would measure 6m in width and 12.5m in length. All caravan units would be single storey.

In terms of the appearance of the units, the applicant has identified four models which are considered to assimilate effectively into the application site. The plan named 'Proposed Caravan Units' details of the proposed models which include:

- Foresters Holiday Lodge;
- Quindi Holiday Lodge;
- The Hampton Holiday Lodge; and,
- The Glass House Holiday Lodge.

Each unit would be constructed in a bespoke manner in accordance with the applicants specified dimensions as detailed above.

The Planning Officer has requested details of the external boundaries to the site. Enclosed within this letter is a boundary treatments plan which proposes knee rail and hand gates, the reinforcing of existing boundary vegetation with native shrub and tree planting, and additional planting of native tree and shrub understorey planting. The proposed boundary treatments are considered to provide security to the site in a manner appropriate to the character and appearance of the area surrounding the application site. The proposed boundary treatments are also considered to reduce the landscape and visual impact of the proposed development as confirmed within paragraph 8.10

of the Landscape and Visual Appraisal which states *"effects would be reduced in the longer term as proposed landscape mitigation planting establishes and integrates within the development"*.

The Planning Officer has requested details of how the proposed hub building would be operated. The use of the proposed hub building will be restricted to users of the caravan site and would not be a destination in its own right; instead its function would be to support holidaymakers and enhance their stay at the holiday park through providing recreational activities and basic convenience goods.

Although the golf facilities would remain open to the public, it is not considered likely golf customers would use facilities within the hub building as they come to the site for a specific purpose. In addition, the existing facilities at the golf course such as the café, bar and restaurant assist in supporting golfers outside of games; it is not considered this would change to how the site operates currently.

Details of the proposed lighting strategy can be secured via condition; the applicant agrees to an appropriately worded pre-commencement condition. At this stage it is anticipated the proposed lighting will be low-level, except from around the hub building, where brighter lights will be required in the interest of public safety. Where brighter lights will be used, these will be directional to minimise light spill.

Policy 31 of the South-East Lincolnshire Local Plan 2019 requires all development proposals to demonstrate the consequences of current climate change has been addressed, minimised and mitigated.

The proposed development firstly seeks to contribute towards achieving sustainable development through using caravan units which would see a high-quality design, constructed to British Standard 3632. BS 2632:2015 requires caravans to be fully insulated, feature 'A' rated PVCu windows and doors, as well as low-energy lighting and improved ventilation. As such, the proposed development would accord with Policy 31(A.1). Any future application for reserved matters for the hub building would also ensure compliance with this policy through securing high-quality design.

Further to this, the proposed development would also comply with Policy 31(A.2) through incorporating flood mitigation measures to reduce the effects of flooding, including Sustainable Urban Drainage Systems and by re-purposing existing ponds on the golf course into SUDs.

Additionally, Policy 31(A.4) seeks to ensure the need to travel is reduced through providing a mix of uses. The remaining golf course and the proposed hub building would provide a diverse range of recreational facilities which would support and enhance the holiday experience for users of the caravan site. Further to this, the ancillary retail store would sell basic convenience goods to holidaymakers and reduce the need to travel away from the application site for these goods. Overall, this diverse mix of uses would allow for the requirements and desires of holidaymakers to be met on site and reduce the need to travel; in accordance with Policy 31(A.4).

The proposed development has been designed to integrate into the application site with a minimal impact to trees and ecology, it is considered this forms a significant part of the attraction of the proposed holiday destination. In the few circumstances where trees and ecology have been impacted upon, it is considered the substantial amount of planting as proposed within the landscaping scheme would assist in mitigating this impact and ensure the natural environment can be protected and enhanced to the highest possible standard, in accordance with Policy 31(A.5).

The Planning Officer has requested details of the total number of parking spaces to be provided on-site. We propose providing one car parking space per caravan unit as given the size of the proposed caravans, it is considered unlikely that multiple cars would arrive with the intention of sharing one caravan. The location of the parking space in relation to the caravan units can be seen on the submitted plans. It should be noted that additional car parking spaces are proposed around the hub building, however the exact number will be based on the size of the hub building, and the proposed uses which would feature within it; these details would form a future application for reserved matters.

The Planning Officer has requested details of how the proposed development would promote and support sustainable travel. The fact that the application site is located in the countryside does inevitably mean holidaymakers would be required to use cars to access the site and to explore the wider surrounding area including into Boston, particularly given the absence of poor-quality pedestrian and cycle infrastructure on the A1121. This being said, the application site is located adjacent the Hubbert's Bridge Railway Station which enables the site to be connected to Boston town centre in a sustainable manner. Additionally, the applicant has agreed to enter a s.106 to pay the planning obligations requested by the local highway authority to support the CallConnect bus in the interests of encouraging sustainable transport. Furthermore, as discussed previously,

the diverse mix of uses would allow for the requirements and desires of holidaymakers to be met on site and reduce the need to travel. Overall, it is considered sustainable travel is supported by the proposed development.

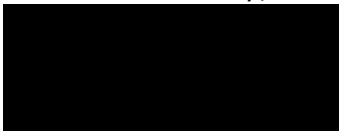
I trust this letter and the enclosed documents are sufficient to address matters which have arisen from the initial consultation period and to progress the application further.

For clarity, the following list details all plans which have been superseded as a result of the documents enclosed within this letter:

- P19-2767.007A Illustrative Site Layout Plan;
- P19-2767.008 Illustrative Site Layout – South Eastern Enlargement;
- P19-2767.008A Illustrative Site Layout;
- P19-2767.009 Tree Survey Plan;
- P19-2767.011A Illustrative Site Layout – Western Area Enlargement;
- P19-2767.013 Tree Canopy Area – Western Area Enlargement;

I look forward to hearing from you following the re-consultation process.

Yours sincerely,



BEN GIBSON

Planner

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Enc.

- RM Associates Covering Letter;
- Anglian Water Pre-Planning Report;
- Foul Drainage Assessment Form;
- Email from Mark Rhodes, Anglian Water 15.04.2020;
- The Wash SSSI Ecological Assessment;
- Boston West Golf Course Viability and Needs Assessment;
- Email from Matthew Draper, England Golf 23.03.2020;

- Ecology and Protected Species Survey;
- Tree Report with AIA;
- Woodlands Nature Resort Overarching Management Principles;
- Illustrative Hub Building Designs;
- Proposed Caravan Units;
- P19-2767.007C Illustrative Site Layout Plan;
- P19-2767.008C Illustrative Site Layout – South Eastern Enlargement;
- P19-2767.015 Change of Use Boundary;
- P19-2767.016 Boundary Treatments – Western Area Enlargement;