

PLANNING, FLOOD RISK, DESIGN & ACCESS STATEMENT

In respect of:

**APPLICATION FOR THE CHANGE OF USE AND EXTERNAL ALTERATIONS TO
EXISTING FRAMED BUILDINGS TO CREATE A DIVING CENTRE, CAFÉ,
STORAGE AND OFFICE. COMPRISING OF INSTALLATION OF WALL AND
ROOF CLADDING, CONSTRUCTION OF CONCRETE BOUNDARY WALLS TO
PROVIDE A SECURE BOAT COMPOUND, CREATION OF NEW VEHICULAR
ACCESS, CAR PARKING AND BUND**



At:

**GRANGE FARM/GLEBE FARM
EAST NEWTON ROAD
EAST NEWTON
EAST YORSHIRE
HU11 4SD**

On behalf of:

NEWTON FARMING LTD

SEPTEMBER 2021

WS Planning
1 Upper Mill View
Meltham
HD9 5AB

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1. Introduction and Background

1.1 Introduction

1.1.1 This Planning Statement has been prepared by WS Planning on behalf of Newton Farming Ltd to accompany a planning application for mixed use development at Grange Farm and Glebe Farm on East Newton Road, East Newton, HU11 4SD. The purpose of this statement is to assist East Riding of Yorkshire Council [ERYC] in its consideration of a planning application for:

"Change of use and external alterations to existing framed buildings to create a diving centre, café, storage and office. Comprising of installation of wall and roof cladding, construction of concrete boundary walls to provide a secure boat compound, creation of new vehicular access, car parking and bund"

1.1.2 This statement considers the applications conformity with the Development Plan, relevant national policy and guidance, as well as other material considerations. It has regard to Section 70 (2) of the Town and Country Planning Act 1990 and Section 38 (6) of the Planning and Compulsory Purchase Act 2004.

1.1.3 In addition to this Statement, the planning application is accompanied by the following:

- Preliminary Ecological Appraisal, prepared by Wold Ecology Ltd.
- Bat Survey, prepared by Wold Ecology Ltd.
- Arboricultural Impact Assessment, prepared by Wold Ecology Ltd
- Transport Statement, prepared by Local Transport Projects Ltd
- The following plans by CK Architectural:
 - Site location plan;
 - As existing site plan;
 - As proposed site plan;
 - As existing and as proposed elevations and floor plans for Barn 1;
 - As existing and as proposed elevations and floor plans for Barn 2; and,
 - As existing and as proposed beach access ramp plan and cross section.

1.2 Report Structure

1.2.0 The remainder of the report is structured as follows:

- Section 2.0 The Site and Proposed Development;
- Section 3.0 Planning Policy Context;
- Section 4.0 Flood Risk Assessment;
- Section 5.0 Policy Assessment; and,
- Section 6.0 Conclusions.

1.3 Environmental Impact Assessment

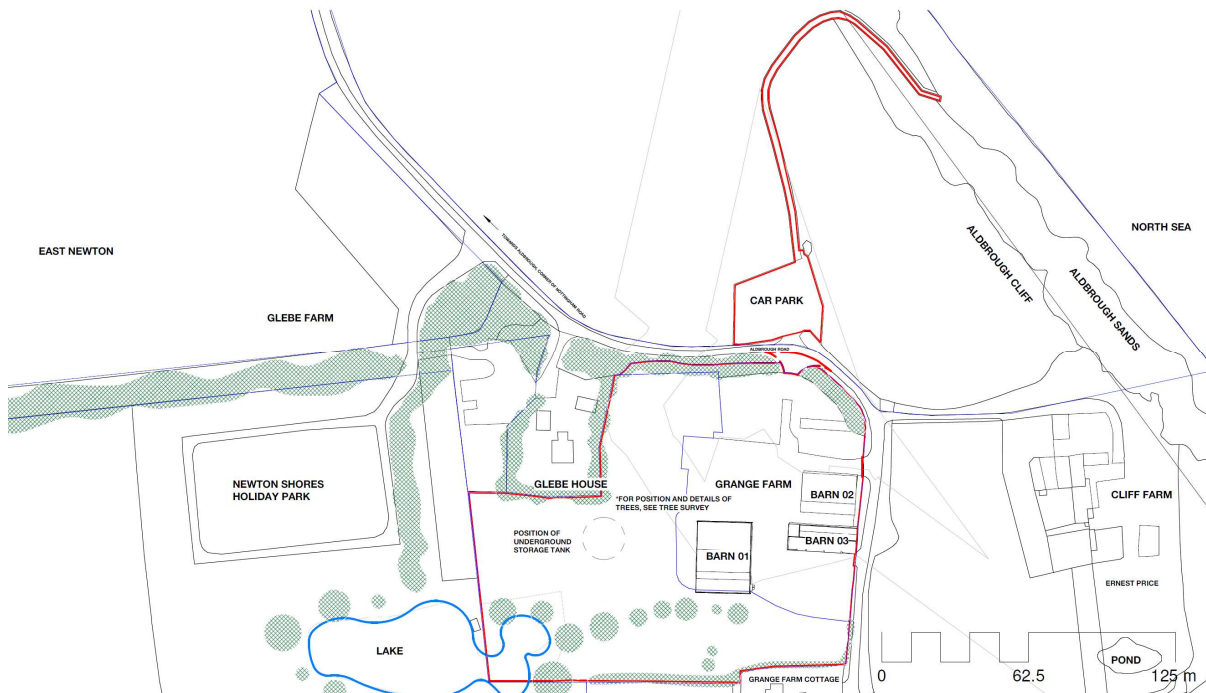
1.3.0 We have considered the proposed development in the context of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

1.3.1 The development is not Schedule 1 nor Schedule 2 Development and therefore does not automatically require an Environmental Impact Assessment [EIA].

2. The Site and Proposed Development

2.1 Site Location and Description

2.1.0 The application site [Site], lies off East Newton Road and extends to approximately 1.8 hectares (4.5 acres) as shown in the image below. The land is relatively level and is located on the edge of the village of East Newton, approximately 1.1 miles southeast of Aldbrough and 8.5 miles northeast of Hull.



2.1.1 The land is agricultural land with an area of hardstanding and agricultural buildings. The site can be accessed directly from East Newton Road via a gated entrance.

2.1.2 The agricultural buildings are summarised as follows:

- Barn 1 – Steel framed and clad agricultural barn – café and storage
- Barn 2 - Steel framed and clad agricultural barn – dive centre and boat store
- Barn 3 – Brick built barn – no change

2.1.3 There are no formal Public Rights of Way that cross the site.

2.1.4 The application site itself is bounded by East Newton Road to the north and east, Glebe Farm Cottage and Newton Shores Caravan Park to the west and Grange Farm Cottage to the

south. Beyond the immediate boundaries, the site is bound by agricultural land to the north, south and west, with the coast (Aldbrough Sands) and North Sea to the east.

2.1.5 Generally, the surrounding landscape consists of open agricultural fields with typical hedgerows and trees to the field boundaries.

2.2 Opportunities and Constraints

2.2.0 The site is located within Flood Zone 1 as identified by the Environment Agency's Flood Risk maps.

2.2.1 The site is located within a Coastal Change Management Area designation.

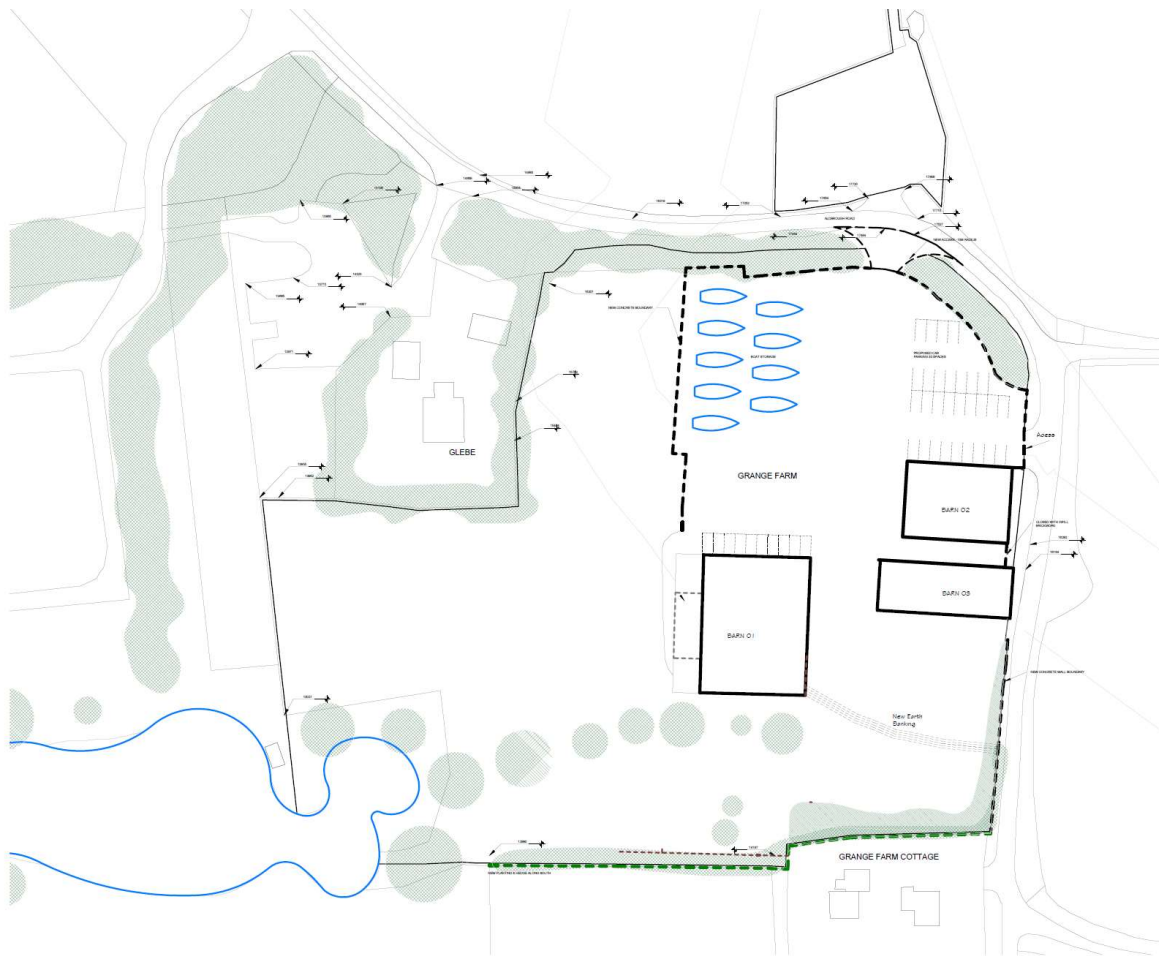
2.2.2 The ecology survey undertaken as part of the application process has noted that barn 3 has bat roosts and any works that affect this building will require a Natural England licence.

2.2.3 An oak tree, on the western boundary is considered to have potential for bat activity, there is also owl activity within the area.

2.2.4 With the exception of the constraints noted above, the site is otherwise relatively unconstrained.

2.3 Development Proposals

2.3.0 The application seeks full planning permission for the change of use of land and existing agricultural buildings to form a dive centre and boat store; café; office; storage and associated works as shown in the image below.



2.3.1 The development proposals comprise a farm diversity scheme for Newton Farming Ltd, which operates over three sites at East Newton, Tansterne and Cowden.

2.3.2 The change of use of buildings is proposed as follows:

- Barn 1 subdivided to provide:
 - 253 sqm for A3/Café use;
 - 276 sqm for storage use; and,
 - 140 sqm for office use (ancillary office space to support proposed dive centre and café)
- Barn 2 to be converted to dive centre and workshop/boat store; and,
- Barn 3 no works proposed as part of this development proposal.

2.3.3 In addition to the proposed use of buildings the development proposal includes:

- The creation of an external secure boat compound through the construction of a concrete boundary wall;

- The provision of onsite parking;
- The closure of the existing site access to the east of the site;
- The creation of a new site access to the north of the site to link the proposed dive centre to the beach access ramp;
- The use of moveable beach/bog mats to protect the beach access ramp and beach during the boat launch process; and,
- The use of precast Allegro blocks (or similar) to protect users of the beach access ramp from any cliff movement.

2.3.4 Foul waste will be managed via the existing treatment plant that serves the site.

2.3.5 Any surface water flows generated from the proposals will be directed to the existing surface water drainage system that serves the site.

2.4 Design and Access

2.4.0 This planning application seeks to refresh two existing agricultural barns, provide a secure boat storage compound, vehicle parking and a revised vehicle access for the site.

2.4.1 It is acknowledged that the site is located close to an area of coastline which is subject to erosion. Consequently, any development within this site will have a limited lifespan and any proposal must give due consideration to the potential impacts of erosion, both on the site and the wider environment.

2.4.2 The proposed development seeks to reuse the frames of the existing agricultural buildings which will be re-clad and re-roofed to provide two refreshed buildings. The cladding will comprise a mix of grey insulated aluminium and translucent panels which will allow natural light to enter the buildings.

2.4.3 The interior fit out will be achieved by using shipping containers which can be easily positioned and then removed when required for site restoration purposes.

2.4.4 As the coastal erosion processes reach the stage whereby the safety of both the buildings, its access and its users, the buildings can be easily dismantled and removed from site, along with the shipping containers that will form the interior.

- 2.4.5 The proposed development is to be served by a car park which will be located to the north of Barns 1 and 2. Locating the car parking in this area of the site will minimise activity around the neighbouring property of Grange Farm Cottage to the south.
- 2.4.6 The site has an existing access directly off East Newton Road, which access is located on the eastern boundary. This existing access is not well located to enable boats to be towed from the boat storage compound to the beach via the existing beach ramp. For purposes of highway safety, the access will be closed and a new site access directly opposite the beach access will be formed.

2.5 Planning History

- 2.5.0 The planning history of the site is summarised below.
- 2.5.1 Planning permission for the retention of an anemometry mast was granted in July 1997 under planning application ref 97/61008.
- 2.5.2 Permission for the change of use of an agricultural building to form bed and breakfast accommodation with a manager's flat was approved in August 2000 under application ref 00/02046. This planning permission relates to Barn 3.
- 2.5.3 Permission for the change of use of land and existing buildings to form a dive centre for training and recreational purposes was approved in November 2002 under application ref 02/03751.
- 2.5.4 Planning permission for the continued use of land as a car park for beach users and the retention of hard surfaced areas was granted in December 2011 under planning application reference 11/03065. An application to discharge the landscaping condition was further approved in March 2012 under application ref 12/3006.
- 2.5.5 An application for a dive centre, boat store and entertainment complex was submitted under 20/01992 and withdrawn in February 2021.

2.6 Background to the application

- 2.6.0 As set out in the planning history above, planning permission for a dive centre was granted in 2000, consequently there is already precedent for such a use in this location.
- 2.6.1 This proposal is based on a previous application ref 20/01992, for the *change of use and external alterations to existing framed buildings to create a specialist diving centre and entertainment complex. Comprising of installation of wall and roof cladding, installation of solar PV panels, air source heat pump, package treatment plant, construction of concrete boundary walls to provide a secure boat compound, creation of vehicular access, car parking and bund*, which was withdrawn on 5th February 2021.
- 2.6.2 A number of objections were submitted in response to 20/01992. The application was scheduled to be heard at planning committee and was recommended for refusal. The committee report set out a number of reasons for refusal, namely:
- Contrary to Policy S4 which promotes sustainable patterns of development within villages and the countryside;
 - Lack of information relating to beach access;
 - Proposed external cladding for Barns 1 and 2;
 - Impact of residential amenity; and,
 - Impact on highway network.
- 2.6.3 In order to resolve the issues outlined in the Officer's report a number of amendments to the proposed scheme have been made:
- The proposed entertainment complex use in Barn 1 has been removed and replaced with a mix of uses, namely a café, storage area and office area;
 - Reduction in the number of proposed parking spaces as a result of the removal of the entertainment complex;
 - A revision in the proposed external cladding for barns 1 and 2 to more reflect the character of the local area.

Proposed Dive Centre & Boat Storage Use

- 2.6.4 A caterpillar crawler and boat cradle will be utilised to service boats up to 12m in length within Barn 2. Boats can then be transported via the beach access to be launched into the North Sea for dive trips. At the end of the dive trips boats will be taken back to site via the beach access.

- 2.6.5 The Crown Estate has issued a licence to the applicant to permit the launching of both leisure and commercial boats from the foreshore. The licence permits the use of a rubber tracker crawler or 4x4 vehicle for the launching of the boats.
- 2.6.6 It is estimated that a total of 11 staff will be required to operate the dive centre and boat storage facility. This will be a mix of both full time and part time opportunities.
- 2.6.7 The site is well located to provide boat transport services for divers interested in the MS Pilsudski wreck.
- 2.6.8 The MS Pilsudski is a well-known Polish Ocean Liner sank on 26th November 1939. The liner was commissioned in 1933 by the shipping company Gdynia-America Line (GAL) in 1933 and constructed in an Italian shipyard. The pride of the Polish fleet, the Pilsudski was over 160m long, 21.5m wide with 7 decks to accommodate 773 passengers and 350 crew members and ran between Gdynia and New York. The luxury liner was fitted out with state-of-the-art technology and an interior designed by the best Polish artists and craftsmen. During World War 2 the liner was converted to a military transport craft and operated under British command. It is suspected that the Pilsudski ran into a minefield some 25 miles off the Withernsea coast.
- 2.6.9 The Pilsudski is the largest known wreck on the Yorkshire Coast and is the 15th most dived of all UK wrecks, attracting not only divers from the UK divers, but as a result of its history it is of historical interest to Polish and Italian divers too. It lies at a depth of 33m, a 9m section of the bow has broken off, the embossed letter of the name on the starboard are still visible and the wreck also offers 3 decks for exploration.
- 2.6.10 Divers usually travel from Bridlington, Scarborough or Hull to explore the site. Bridlington, the nearest location is still some 50 miles (2 hours in a RIB) from the dive site. The introduction of a dive centre at East Newton that could facilitate trips would enable a reduction in travel time to and from the site, enable additional boats to get to the site in cases of emergency in addition to reducing the volume of fuel required for each trip.
- 2.6.11 In addition to the MS Pilsudski, there are a number of other wrecks in the area that are of great interest to divers, these include:

- MV Canada sank on 4th November 1939 some 6 miles off the coast of Withernsea
- SS Dryburgh collided with the wreck of the MV Canada on the 11th November 1939
- The Greek SS Georgios also collided with the wreck on the MV Canada on 14th November 1939

Proposed Cafe Use

- 2.6.12 This proposal seeks the creation of a modest café facility on site within Barn 1. The café will be well located to serve visitors to the Newton Shores Caravan Park, the proposed dive centre and boat storage facility, as well as general passing trade such as the beach anglers, cyclists and ramblers making use of the coastal path.
- 2.6.13 It is estimated that 4 staff will be required to operate the café facility. This will be a mix of both full time and part time opportunities.

Office & Storage Space

- 2.6.14 It is proposed that the remaining space within Barn 1 will be split between office and storage space. The proposed storage space will be used to serve both the café and dive centre, providing well located, yet separate space for staff to undertake their general administrative work. The proposed storage space will continue to office space to store equipment for a number of businesses, including continuing to provide storage space for Newton Farming Ltd and the potential to store additional equipment associated with the proposed dive centre and café.

3. Policy Context

3.1 Introduction

3.1.0 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.

3.2 National Planning Policy Framework

3.2.0 The Framework was published in July 2021 by the Ministry of Housing, Communities and Local Government. The overarching aim of the Framework is to proactively deliver sustainable development to support the Government's economic growth objectives.

3.2.1 The Framework [§7 & 8] identifies three dimensions (economic, social and environmental) to sustainable development. It indicates that to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.

3.2.2 Paragraph 10 states that:

"At the heart of the Framework is a presumption in favour of sustainable development."

3.2.3 For decision making it goes on to advise this means approving proposals that accord with the development plan without delay; and where the development plan is absent, silent or relevant policies are out of date, granting permission unless:

"the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or,

Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole".

3.2.4 Paragraph 11 of the Framework is unequivocal that authorities should approve:

"...development proposals that accord with an up-to-date development plan without delay".

3.2.5 Paragraph 84 states

"...planning policies and decisions should enable... sustainable rural tourism and leisure developments which respect the character of the countryside..."

3.3 National Planning Practice Guidance

3.3.0 On 6 March 2014, the Government launched the online National Planning Practice Guidance [NPPG] and cancelled most of previous planning practice guidance documents.

3.3.1 This includes relevant sections on the consideration of planning applications [Section 21b], the use of planning conditions [Section 21a], and planning obligations [Section 23b]. It also includes advice on specific topic area including the natural environment [Section 8], design [Section 26] amongst other matters. Those sections are not repeated here but are referred to below as appropriate in the consideration of the proposed development.

3.4 Development Plan

3.4.0 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.

3.4.1 In this instance, the Development Plan comprises the East Riding Local Plan Strategy Document [ERSD], adopted 6th April 2016 and the East Riding Local Plan Allocations Document [ERAD], adopted 27 July 2016.

3.5 East Riding Local Plan Strategy Document

3.5.0 The ERSD was adopted on 6th April 2016 and sets out the long-term strategic policies for the East Riding during the period 2012 to 2029.

3.5.1 The ERSD provides detailed policies against which development proposals will be considered. The most relevant are:

- Policy S1: Presumption in favour of sustainable development;
- Policy S4: Supporting development in villages and the countryside;
- Policy EC1: Supporting the growth and diversification of the East Riding economy;
- Policy EC2: Developing and diversifying the visitor economy;
- Policy EC4: Enhancing sustainable transport;

- Policy ENV1: Integrating high quality design;
- Policy ENV2: Promoting a high quality landscape;
- Policy ENV6: Managing environmental hazards; and,
- Policy A5: Holderness & Southern Coastal sub area

- 3.5.2 Policy S1 sets out the local planning authority's position with regards to the presumption in favour of sustainable development, reflecting the tone of the Framework.
- 3.5.3 Policy S4 sets out the spatial principles of development within the villages and countryside. Where development proposals respect the intrinsic character of their surroundings, Criterion C6 supports employment uses in accordance with Policy EC1, such as retail, and C11 of the policy supports tourism-based development within the countryside.
- 3.5.4 Policy EC1 is a key employment and economy policy that supports the strengthening and diversification of the county economy. Criterion D supports proposals outside of development limits where it is of an appropriate scale to its location and respects the character of the surrounding landscape.
- 3.5.5 Policy EC2 is the overarching policy regarding development which impacts on the visitor economy.
- 3.5.6 Policy EC4 is concerned with enhancing sustainable travel and transport. The policy looks at supporting development which promotes the use of car sharing, cycling and walking whilst also managing the number of car parking spaces.
- 3.5.7 Policy ENV1 sets out the design criteria that should be considered for all proposals.
- 3.5.8 Policy ENV2 requires that proposals have regard to the existing landscape.
- 3.5.9 Policy ENV6 is concerned with managing environmental hazards to ensure that development does not result in unacceptable consequences to its users and the environment. The policy has regard to flood risk, coastal change and groundwater pollution. In areas of coastal change the policy supports appropriate temporary development where that development is safe from the risk associated with coastal change for its intended lifespan, does not have an

unacceptable impact on nature, landscape or heritage designations and local character and amenity.

- 3.5.10 Policy A5 sets out the long-term strategic development aims for the Holderness & Southern Coastal sub area. Criterion B1 provides support for the appropriate expansion of key economic sectors, including tourism. Criterion C3 permits appropriate temporary development in the CCMA where it would contribute to the local economy.

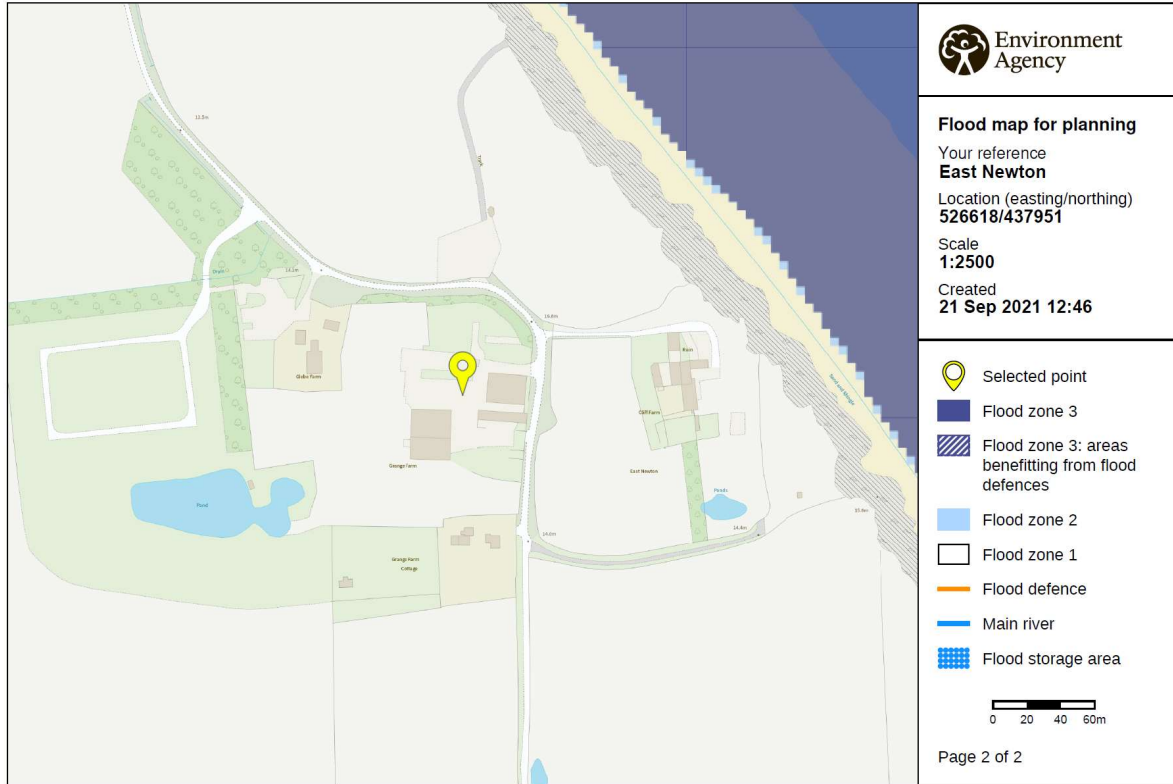
3.6 Supplementary Planning Documents

- 3.6.0 The only relevant SPD is for Transport. The SPD adopted in May 2016 and provides further detail on travel plans and vehicle parking requirements.

4. Flood Risk

4.1 Introduction

4.1.0 The application site is located extends to 1.8 hectares and is located within flood zone 1 as is illustrated in the Environment Agency Flood Risk Map extract below.



4.1.1 As the application site extends to more than 1 hectare within flood zone 1, it is necessary to provide a flood risk assessment in support of any planning application.

4.1.2 Table 2.1 of the Framework Guidance sets out the flood zone definitions:

- **Flood Zone 1** – low probability, land having a less than 1 in 1,000 annual probability of river or sea flooding;
- **Flood Zone 2** – Medium probability, land having between a 1 in100 and 1 in 1,000 annual probability of river flooding; or land having between a 1 in 200 and 1 in 1,000 annual probability of sea flooding;
- **Flood Zone 3a** – high probability, land having a 1 in 100 or greater annual probability of river flooding; or land having a 1 in 200 or greater annual probability of sea flooding; and,
- **Flood Zone 3b** – functional floodplain, this zone comprises land where water has to flow or be stored in times of flood. Local planning authorities should identify in their

Strategic Flood Risk Assessments areas of functional floodplain and its boundaries accordingly, in agreement with the Environment Agency.

4.1.3 The proposed land use is for the change of use of existing buildings to accommodate a mix of uses, including a dive centre, boat storage, café, office and additional storage. This is classified as “Less Vulnerable” development within the Frameworks guidance.

4.1.4 Table 2.2 of the Framework Guidance provides a quick visual aid for assessing the flood risk, vulnerability and flood zone compatibility for development proposals and identifying the extent of information required in support of individual planning applications.

Table 2-2: Flood risk, vulnerability and flood zone compatibility

| Flood Zone | Flood risk vulnerability classification | | | | |
|------------|---|-------------------------|-------------------------|-----------------|------------------|
| | Essential infrastructure | Highly vulnerable | More vulnerable | Less vulnerable | Water compatible |
| Zone 1 | ✓ | ✓ | ✓ | ✓ | ✓ |
| Zone 2 | ✓ | Exception test required | ✓ | ✓ | ✓ |
| Zone 3a | Exception test required | ✗ | Exception test required | ✓ | ✓ |
| Zone 3b | Exception test required | ✗ | ✗ | ✗ | ✓ |

✓ Development is appropriate
 ✗ Development is not permitted

4.1.5 Table 2.2 confirms that “less vulnerable” development is considered to be appropriate in flood zone 1. The table also confirms that there is no requirement for the development proposals to be subjected to either the Sequential Test or the Exception Test.

4.2 Site & Surrounding Area

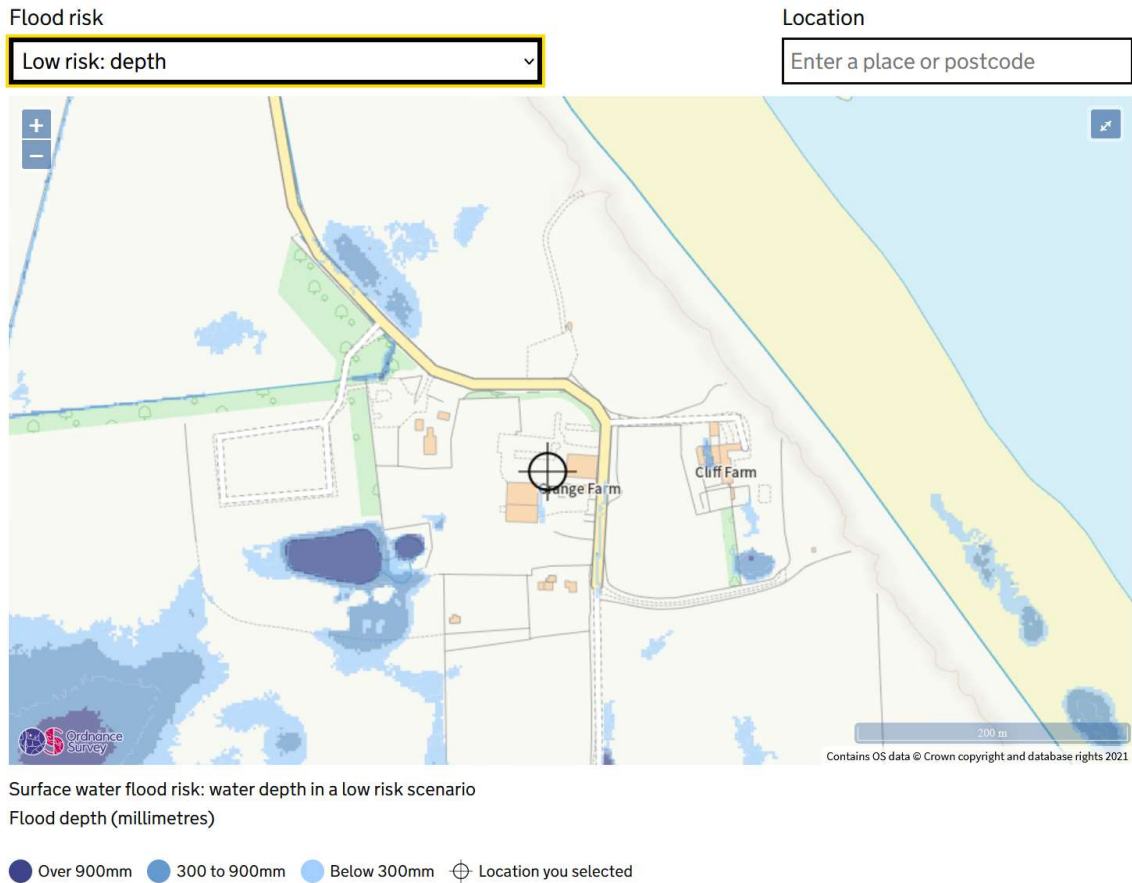
4.2.0 The application site lies at approximately 17m AOD and is relatively level throughout.

4.2.1 There are no watercourses nearby, however there is a small pond to the west of the site and the North Sea to the east.

4.3 Extent of Flood Risk

4.3.0 The site is located in flood zone 1 and is therefore at low risk of flooding.

4.3.1 An extract from the Environment Agency’s surface water flooding map, which shows high risk areas according to depth indicates that those areas of the site which are subject to surface water flooding will be below 300mm (>30cm).



4.4 Historic Flooding

4.4.0 It has not been possible to obtain any information which indicates that the site has a history of flooding.

4.5 Mitigation

4.5.0 The proposed development will require limited construction activities.

4.5.1 The existing buildings will be re clad and re-roofed. There will be no increase in the size of the buildings.

4.5.2 The proposed development will not impact on the levels of permeable ground on site and thus there is no expected increase in surface water from the site.

4.6 Conclusion

4.6.0 The application site lies within flood zone 1 and is considered to be an appropriate location for the proposed development.

4.6.1 There will be no overall reduction in the extent of permeable ground within the application site and therefore no detrimental impact to surface water.

5. Policy Assessment

5.1 Introduction

5.1.0 Section 38(6) of the 2004 Act requires that the application be determined in accordance with the provision of the development plan unless material considerations indicate otherwise.

5.1.1 The main consideration is the principle of this mixed-use development in this location.

5.1.2 In addition to these main issues, the following other considerations are material to the assessment of the application:

- Coastal Change;
- Landscape;
- Ecology;
- Access & Highways; and,
- Design.

5.2 The Principle of Development

5.2.0 The most relevant Development Plan policy to consider whether the principle of the proposed development is acceptable is Policy EC1 (Criterion D) of the ERSD which relates to the growth and diversification of the East Riding economy outside of the defined development limits.

5.2.1 Criterion D states as follows:

Outside of development limits employment development will be supported where it is of an appropriate scale to its location and respects the character of the surrounding landscape.

Proposals should:

- 1. Be within or adjacent to an existing industrial estate or business park;*
- 2. Involve the expansion of an existing business;*
- 3. Involve the conversion of an existing building; or,*
- 4. Have a functional need to be in the particular location which cannot be met on either a nearby allocation, or on a site which satisfies any of the above criteria.*

5.2.2 The proposal will not result in the introduction of any new buildings, nor will it increase the scale of any existing buildings. The proposal comprises the re-cladding of existing agricultural buildings, using an insulated aluminium cladding panel in grey, similar to the

colour of the existing cladding. The proposals do require some additional works to the land, namely the erection of a concrete wall, the repositioning of the site entrance and landscaping, but to a large extent, these works will not be visible from outside of the site. It is therefore considered that the proposed development is of an appropriate size and scale for its rural location and will have a suitable appearance that reflects and respects the character of the surrounding landscape.

- 5.2.3 As noted above, the proposals seek to re-use existing agricultural buildings in accordance with Policy EC1 Criterion D3.
- 5.2.4 The main purpose of the proposed development is to provide a new dive centre and boat store which will serve the sea and wreck diving community. Consequently, it is necessary for any such development to have a coastal location with an existing beach access. There are a limited number of existing beach accesses along the East Riding coastline, and it is essential that any beach access used for this purpose has the benefit of available land and buildings to accommodate such a development and service the proposed activities.
- 5.2.5 Details regarding several wrecks located off the coast of Withernsea were set out in Section 2. Wreck divers currently commence their trips from the main towns of Scarborough, Bridlington and Hull, all of which are significantly further from the wreck dive sites than the application site. The introduction of a diving centre in this location will reduce the time spent travelling from the coast to the dive site in addition to reducing the volume of fuel required for the journey.
- 5.2.6 The introduction of a modest café in this location will be well located to serve the customers of the existing Newton Shores Caravan Park, the proposed dive centre, cyclists and walkers. The proposed office and storage use are ancillary to the main proposed functions of a dive centre and café and will provide the necessary space to support these two enterprises.
- 5.2.7 The applicant considers that the above clearly sets out the functional need for the location of the proposed development and as such the proposals accord with the objectives of Policy EC1 Criterion D4.
- 5.2.8 As the proposed development involves the redevelopment of existing farm buildings for non-agricultural purposes, the application should also be considered under Policy EC1 Criterion F.

This criterion support farm diversification schemes providing they are of an appropriate scale, respect the character of the surrounding landscape and re-use existing buildings where possible. For the reasons set out above, it is considered that the proposal wholly accords with the aims and objectives of Policy EC1 Criterion F.

5.2.9 We now look at the aims and objectives of Policy EC2 Criterion B which has regard to developing and diversifying the visitor economy in the countryside.

5.2.10 The proposals seek to re-use existing farm buildings within an existing working farm enterprise, wholly in accordance with Policy EC2 Criterion B1 and B3.

5.2.11 The functional need for the location has already been discussed in relation to Policy EC1, and as such it is considered that the proposals accord with the aims and objectives of Policy EC2 Criterion B5.

5.2.12 It is therefore evident that the principle of this development in this location is acceptable, and we can now consider that development proposals against other policies within the ERSD.

5.3 Coastal Change

5.3.0 The key policy here is ENV6, specifically Criterion E, F and G.

5.3.1 Criterion E advises that the policies map will show the areas of concern as a Coastal Change Management Area. The policies map does indeed show that the site is located within such a designation and is considered to be in the 2025 to 2055 zone.

5.3.2 Criterion F set out the situations in which development proposals will be supported. Criterion F1 advises that temporary development (such as those shown in Table 11), which will contribute to the local economy or help improve the East Riding tourism offer would be supported.

5.3.3 *Table 11 – Guide to Appropriate Development within the CCMA* advises that appropriate development for sites within the 2025 to 2055 zone is considered to include:

- Replacement, relocation and adaptation of facilities and infrastructure deemed to be essential to support the continued operation of existing commercial/business uses;
- Changes of use from permanent residential to other strictly limited temporary uses, including change of use to agriculture or tourism uses.

5.3.4 It is noted that Table 11 is titled as a *guide* and as such its contents cannot be considered to provide an exhaustive list of development proposals that can be considered appropriate. The supporting text, (para 8.104), advises that proposals should have net sustainability benefits, which should be secured and may include maintaining or adding to local jobs, improvements on site quality and appearance, access and open space improvements and provision of tourist and community facilities. It is noted that this does appear to mainly refer to holiday park development, however, there is no reason as to why such net sustainability benefits cannot be a material consideration for other commercial proposals.

5.3.5 The proposed development is merely for a change of use of existing land and buildings. The proposal does not seek to introduce new buildings, merely to refresh and repurpose the existing structures. Furthermore, the development proposals, as set out in Section 2, are only intended to be temporary and have been designed in a manner that acknowledges the reality that they will have to be removed from site in the future.

5.3.6 Introducing a new commercial function into these buildings will provide an opportunity for two new enterprises to provide employment opportunities to the local community in a range of trades. Furthermore, the introduction of the dive centre element provides a new form of tourism activity in this area.

5.3.7 It is therefore considered that the proposed development accords with the aims and objectives of Policy ENV6 Criterion F1, F3i, ii and iv.

5.3.8 The proposed development also includes the use of the existing beach access for boat launching purposes. The access slope will require some minor regrading to assist with the action of towing boat to and from the beach. It is proposed that bog mats will be laid on the slope to protect the ground during towing. Precast Allegro style blocks are also proposed to be positioned at the sides of the beach access ramp to protect the ramp and its users from any potential cliff movement. Both the bog mats and Allegro blocks are of a mobile and temporary nature, they do not require to be fixed to the ground, and can be

easily moved when required, thus allowing for the coastal changes processes to continue naturally whilst maintaining this long-established beach access. It is therefore considered that any works associated with the existing beach access will accord with Policy ENV6 criterion G.

5.4 Landscape

5.4.0 The impact of development proposals on the landscape is always of a significant concern, particularly in rural locations. These proposals have therefore been developed having regard to Policy ENV2.

5.4.1 As discussed earlier in this section, the extent of new physical development in these proposals is limited and will extend to the relocation of the site access, the creation of a concrete wall, vehicle parking and landscaping, most of which will not be visible from out with the site. The main works will be the recladding and re-roofing of the existing agricultural buildings. The previous application 20-01992 proposed a modern, more urban approach to the cladding, and this was met with some concern regarding visual impact. These revised proposals now seek a more traditional approach and propose the use of a grey cladding, with a colour and tone similar to the existing buildings.

5.4.2 The proposals will not impact on any important open spaces, no trees or important hedgerows will be removed and the views across the site and of the buildings will not be altered, save for the replacement cladding.

5.4.3 It is therefore considered that the proposal wholly accords with the aims and objectives of Policy ENV2.

5.5 Ecology

5.5.0 The impact of development proposals on local ecology is also a significant concern in rural locations. These proposals have therefore been developed having regard to Policy ENV2.

5.5.1 The application is supported by Preliminary Ecological Appraisal undertaken by Wold Ecology. The appraisal has included the following:

- Ecology Desk Study;

- Extended Phase 1 Habitat Survey;
- Species Appraisal; and,
- Habitats Appraisal.

5.5.2 The PEA identified some potential for roosting bats within Barn 3, consequently a bat survey was undertaken by Wold Ecology. The report advises that a Natural England licence will be required before undertaking any works in Barn 3, which barn lies out with the scope of this planning application.

5.5.3 In addition to bats, the PEA identified potential for owls and nesting birds and recommends that additional species-specific surveys are undertaken prior to commencing any works on site.

5.6 Access and Highways

5.6.0 The site currently benefits from a direct access from East Newton Road from the east. This access is not well located to enable the safe movement of boats from the site to the beach access ramp. It is therefore proposed that the existing access be closed and a new access provided on the northern boundary of the site, immediately opposite the beach access ramp.

5.6.1 Given the rural location of the site, it is not well served by public transport. The nearest bus stops are located some 2.5km to the northwest in Aldbrough and provides access to services between Hornsea and Withernsea.

5.6.2 There is no formal pedestrian infrastructure within 2.4km of the site, however East Newton Road is lightly trafficked and could provide suitable pedestrian access to and from the site.

5.6.3 Despite the rural location of the site and the lack of formal pedestrian and cycling infrastructure, it is considered that overall, the general environment is conducive to supporting movement by other means than private car within the local area.

5.7 Design

5.7.0 Aspects of the approach to design have been discussed in Section 2.4 of this Statement.

- 5.7.1 The development proposals are for the recladding of existing buildings which will accommodate a dive centre, boat store, café as well ancillary office and storage space.
- 5.7.2 The proposed cladding materials are of a material traditionally used for agricultural buildings and will be of a colour similar to the existing cladding.
- 5.7.3 The scheme has been designed to have minimal impact on the existing landscape infrastructure.
- 5.7.4 The proposals have a limited lifespan due to their location and the approach taken to the fit out of the buildings reflects this. The use of shipping containers to provide internal spaces such as the changing rooms, workshop and toilets etc will enable the site to be cleared easily and quickly.

6. Conclusions

- 6.1 The assessment against the policies in the Development Plan has been set out in detail in Section 5 of this Statement.
- 6.2 The proposed development performs a positive economic, social and environmental role and comprises sustainable development in accordance with the provisions of the Framework. As a result, there is a presumption in favour of granting the application proposals.
- 6.3 The proposals make a positive contribution to supporting and diversifying the tourism offer within the locality and will build on the existing tourism offer of Newton Shores Caravan Park and enable further diversification of the farm holding through the re-purposing of existing farm buildings and land.
- 6.4 New employment opportunities will be provided in this rural area. There will be a mix of full and part time opportunities across a number of trades including hospitality, administrative support, boat servicing and maintenance and diving specialists/support staff.
- 6.5 The siting of a dive centre in this location will enable both time and energy efficient travel to and from the popular wreck dive sites off the coast of Withernsea, as opposed to the ad-hoc trips that are organised from the larger populated areas of Bridlington, Hull and Scarborough.
- 6.6 The overall conclusion is that in respect of the details of the proposed scheme, the proposals accord with the policies within the Development Plan. The proposals represent sustainable development within the context of the Framework. It has been demonstrated that there are no significant adverse effects arising from the proposed development. It is therefore concluded that in accordance with paragraph 11 of the Framework that planning permission should be granted without delay.