

## **Planning, Design and Access Statement (including Sustainability Appraisal)**

### **Change of use of part of former golf course site for the siting of 56 static caravans with associated access and car parking arrangements, excavation of five fishing ponds and other biodiversity enhancement areas including wildflower meadow, woodland planting and other proposed landscaping at land adjacent The Elms Caravan Park, Addlethorpe, Skegness.**

#### **Introduction**

This Planning, Design and Access Statement has been prepared to accompany a full planning application to extend the existing The Elms Caravan Park which comprises the change of use of part of former golf course site for the siting of 56 static caravans with associated access and car parking arrangements, excavation of five fishing ponds and other biodiversity enhancement areas including wild flower meadow, woodland planting and other proposed landscaping at land adjacent The Elms Caravan Park, Addlethorpe, Skegness.

#### **Extract showing Application Site in the context of the Elms Caravan Park.**



Location of Application site outlined in red to the south of the existing and approved caravan site.

## **The site and surroundings**

Addlethorpe is located in close proximity to the centre of Ingoldmells which is situated approximately 0.6 miles away to the east on the North Sea coast. Ingoldmells along with the coastal town of Skegness are holiday destinations and boast a wide provision of services and a thriving tourist industry. The Addlethorpe area is home to a small number of caravan sites including The Elms Caravan Park which is situated on the western edge of Addlethorpe. The pattern of development at this locality has been described by an Inspector in a recent Appeal as scattered with sporadic pockets of housing widely distributed. The Inspector goes on to identify that on the whole the various holiday caravan parks that exist in the area are discreetly sited behind perimeter fencing or screening and are part and parcel of the wider area's character.

The long-established Elms Caravan Park is extremely well screened by mature and dense perimeter planting which limits views of the existing caravans from the public domain. In addition to caravan pitches and associated buildings the caravan park also contains various fishing ponds and recreational spaces for its visitors. The site provides around 280 touring pitches as well as a growing number of static caravan pitches. The site has planning consent to extend the caravan park into the adjoining former golf course site to provide 26 static caravans and three fishing ponds which is under construction approved under S/002/00389/19. Planning consent has also been granted for a further extension to provide an additional 27 static caravan pitches and two fishing ponds along with other ecology enhancement areas under reference S/002/00726/20. In addition, planning permission has also recently been granted for a further extension to provide an additional 41 static caravan pitches and four fishing ponds, provision of a wildflower meadow and woodland area under reference S/002/00106/21.

This application site forms the final part of a former golf course and directly adjoins the recently consented extensions to The Elms caravan park to the north. The majority of the site is reasonably level. Whilst the site has not been used for recreational golf for many years, it has been periodically mown since the applicant took possession. A smaller golf course and driving range however continues to operate on adjoining land, where planning permission has also recently been approved for 39 holiday lodges etc approved under reference S/002/00929/21.

Given its former use as a golf course, the site benefits from an array of landscaping features including planted earth mounds, various bunkers and extensive swathes of established shelter belt copse planting. The site is therefore well enclosed by vegetation along the majority of its boundaries.

## **Recent Planning Approvals at The Elms Caravan Park**

S/002/00106/21 Planning consent approved for change of use of land to provide an extension to the existing caravan park for the siting of 41no. additional static caravans with associated car parking, excavation of land to

provide 4no. fishing ponds, provision of a wildflower meadow and woodland area.

S/002/00726/20 – Planning consent issued to change the use of former golf course to site 27 no. static caravans, construction of vehicular access, associated parking, excavation of 2 no. fishing ponds and provision of a woodland area.

S/002/00389/19 – Planning permission granted for change of use of land for siting of 26 no. static caravans with associated car parking, excavation of land to provide 3 fishing ponds and associated landscaping such as a nature trail, meadow and wood land, construction of outdoor gym and construction of a vehicle access. Development under construction.

S/002/00636/17 - Planning permission granted for change of use of land to site 14 static caravan pitches.

S/002/02281/16 - Planning permission granted for change of use of land to provide an extension to existing caravan park to provide 16 no. additional touring caravan pitches.

S/002/01782/12- Planning Permission granted for change of use of land to site 14 no. touring caravans.

S/002/00548/07- Planning Permission granted for the change of use of existing recreation area to use as an extension to existing touring caravan site.

002/01441/01- Planning Permission granted for the excavation of land to form a commercial fishing lake and provision of banking.

S/002/00343/01 - Planning Permission granted for the erection of a reception building and shop and repositioning of an internal road.

S/002/00785/00- Planning Permission granted for the construction of a vehicular and pedestrian access and construction of a roadway.

### **Golf Club Site**

S/002/00929/21- Planning permission for erection of 39no. holiday lodges on the site of part of existing golf course, extension and alterations to existing club house to provide a reception, terrace and shop. Excavation of land to form a feature lake, provision of a crazy golf area, viewing platform, pumping station and associated parking.

S/002/00722/96 – Planning permission for change of use of agricultural land into a golf course, use of existing building for storage and construction of vehicular and pedestrian access.

## Proposed Development

The existing Elms Caravan Park provides around 280 caravan pitches, as well as a growing number of static pitches. Planning has been granted for three extensions to the caravan park into the adjoining former golf course site which together provide 94 static caravans along with nine new fishing ponds and ecological enhancement areas to the north of the application site. These earlier consents are well underway or under construction.

This planning application seeks approval for a further extension to The Elms Caravan Park and planning permission is therefore sought for change of use of part of former golf course site for the siting of 56 static caravans with associated access and car parking arrangements, excavation of five fishing ponds and other biodiversity enhancement areas including wildflower meadow, woodland planting and other proposed landscaping. As part of this proposal further generous areas of woodland landscaping to both the western and most southerly part of the site is offered as biodiversity enhancement and net gain.

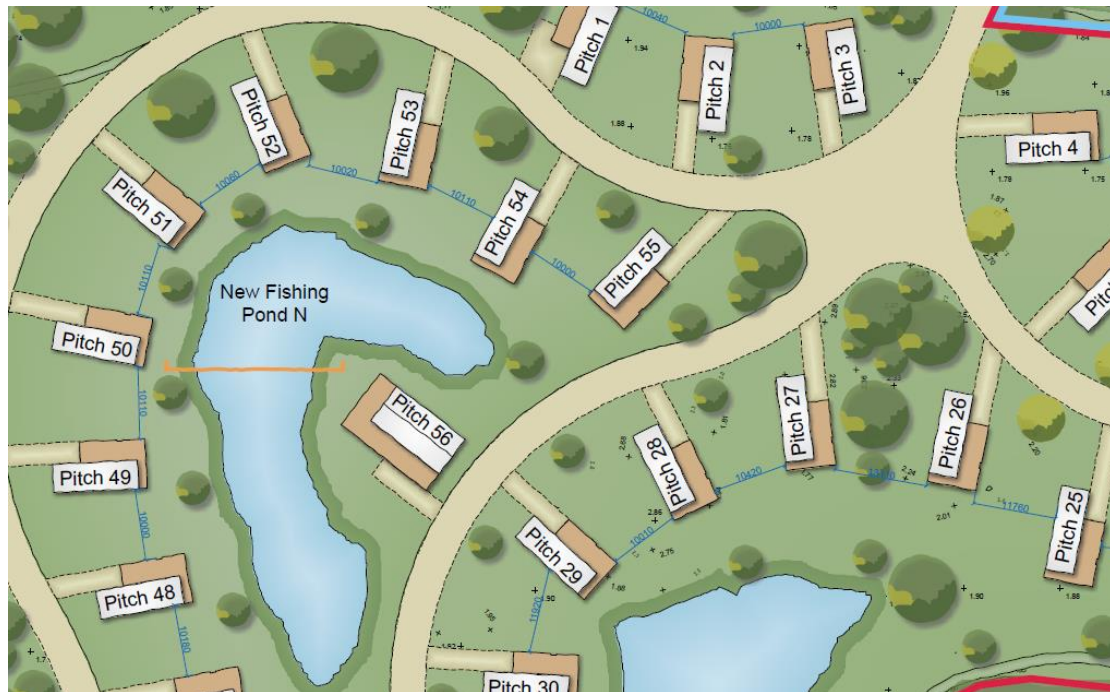
As indicated by an orange dashed line on the extract of the submitted plan below, access to the caravan park extension would be gained through the existing caravan site and through the recently consented extensions via the main caravan park entrance from Orby Road which is barrier controlled. The main entrance was specifically designed and created to serve the specific requirements of the caravan park and be suitably sized and robust enough to cater for any future expansion.





Like other recent extensions to the caravan park, the access routes within the caravan park extension would be curved and organic in nature as opposed to the more traditional grid layout.

The static caravan pitches will be laid out in a similar generously spaced manner to the recently consented park extensions, exceeding the space standard requirements of caravan site licensing, giving a reduced density layout when compared to the traditional parts of the main caravan site.



As can be seen from the extract of the proposed layout plan above, almost all the caravans have been arranged so they will overlook the new proposed fishing ponds. As the cross sections of the ponds on the submitted plans show the ponds have been designed not only for recreational fishing purposes but also to create suitable refuge habitats in the shallows to enhance the biodiversity offer as well as to attract wildlife.

The findings and recommendations of the ecological survey work carried out, have been carefully reviewed as part and parcel of the submitted plans.

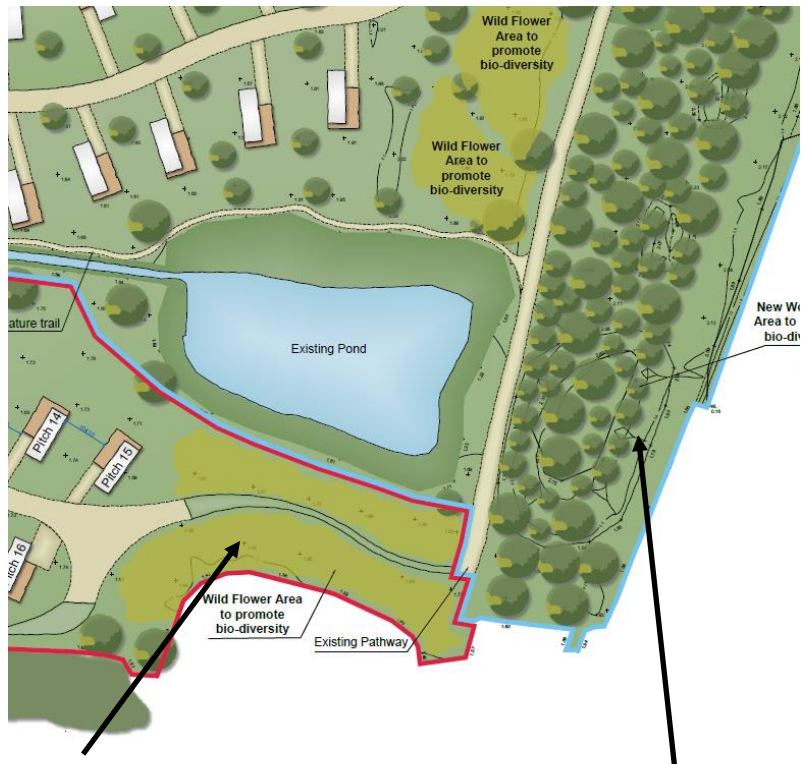
Additionally, in the interests of conserving biodiversity, further flora and fauna enhancement opportunities are proposed. A generous area of woodland planting to the northeast and east forms part of the earlier consented extensions. An extensive belt of conifer trees already exists along the southern boundary of the site which provides extensive screening.

A further belt of trees is proposed along the western and southern most site boundary with the primary objective of delivering, as part of these proposals, net gains for biodiversity. An additional area of wildflower meadow planting is proposed at the eastern end of the application site.

It is the long-term intention that the eastern tranche of the former golf course site that is in the ownership of the applicant will become a haven for wildlife



and this habitat will be enhanced further with new habitat creation accordingly.



Proposed Wildflower Meadow

Previously approved new woodland area

The previously approved nature trail will be extended as part of the proposed scheme so that it becomes an integrated part of the overall caravan park.

Orchard Avenue: Green (already approved)  
Nature Trail: Blue (already approved)



Proposed Extended Nature Trail: Yellow

Occupiers of the proposed caravan park extension will also be able to use and enjoy the pieces of new outdoor gym equipment along the nature trail that will be provided as part of the earlier development. This will also help to promote healthy lifestyles, fitness and well-being.

## Planning Policy Context

### The Development Plan

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan currently comprises the East Lindsey Local Plan (1999).



## National Planning Policy Framework (NPPF) 2021

The Framework sets out the Government's planning policies for England and details how these should be applied at a local level. Paragraph 8 of the Framework sets out three objectives to sustainable development, namely economic, social and environmental. The Framework is to be read as a whole in making decisions as to whether a proposal comprises sustainable development. Paragraph 8 of the Framework states that to achieve sustainable development, economic, social and environmental gains should be sought jointly, in mutually supportive ways, and simultaneously through the planning system.

Economic objectives include helping to build a strong, responsive and complete 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.

Social objectives include supporting strong, vibrant and healthy communities through well-designed and safe built environments with accessible services that reflect current and future needs and support the health, social and cultural well-being of communities.

Environmental objectives include contributing to protecting and enhancing the natural, built and historic environment by making an effective use of land and helping to improve biodiversity and mitigating and adapting to climate change including moving to a low carbon economy.

Paragraph 11 of the Framework sets out how the presumption in favour of sustainable development should be applied through both plan-making and decision-taking. For decision-taking the Framework states that this means that unless material considerations indicate otherwise development proposals that accord with an up-to-date development plan should be approved. Where there are no relevant development plan policies or the policies which are most important are out of date, permission should be granted unless the application of policies in the Framework that protect areas or assets of particular importance provides clear reasons for refusing the development or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

The Government's proposals for delivering sustainable development through the planning system are subsequently set out in sections 1-16 of the NPPF. However, to positively pursue sustainable development as set out in paragraphs 10 and 11 a presumption in favour of sustainable development is advocated.

It is confirmed at paragraphs 81-83 that the Government is committed to securing economic growth to help create the conditions which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productively, taking into account both local business needs and wider opportunities for development. Each area should be allowed to build on its strengths, counter any weaknesses and address the challenges of the future.

Paragraph 84 states that planning policies should enable the sustainable growth and expansion of all types of business in rural areas, the development and diversification of agricultural businesses, the sustainable tourism and leisure developments that respect the character of the countryside as well as the development of accessible local services and community facilities such as local shops, meeting places, open space etc.

To meet local business and community needs in rural areas, as set out in paragraph 85 of the NPPF sites may need to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In such circumstances it is identified that it will be important to ensure that

- development is sensitive to its surroundings;
- does not have an unacceptable impact on local roads; and;
- exploits any opportunities to make a location more sustainable.

Sites that are physically well related to existing settlements should be encouraged where suitable opportunities exist.

Paragraph 124 advocates and supports the efficient use of land.

The creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Paragraph 126 of the NPPF sets out that good design is a key aspect of sustainable development to creating better places and to help make development acceptable to communities.

Paragraph 130 states that to achieve well designed places development will need to function well and add to the overall quality of an area, just for the short term but over the lifetime of the development, be visually attractive with good architecture, layout and appropriate and effective landscaping, be sympathetic to local character including the surrounding built environment and landscape setting whilst not discouraging appropriate innovation or change and optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development.

Paragraph 159 of the Framework states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk.

Paragraph 162 of the NPPF requires a Sequential Test to be carried out for the location of development and the aim is to steer new development to areas with the lowest probability of flooding.

As paragraph 174 confirms, the planning system should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity.

Paragraph 180 sets out that if significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused. It then goes

on to state that opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

### **East Lindsey Local Plan Core Strategy**

The East Lindsey Local Plan Core Strategy was adopted in July 2018. Relevant policies include:

Strategic Policy (SP) 1 (A Sustainable Pattern of Places) sets out a settlement hierarchy for the District and identifies Addlethorpe as a 'Medium Village'.

SP2 (Sustainable development) requires the Council to take a positive approach when considering development proposal that reflect the presumption in favour of sustainable development contained in the NPPF.

SP10 (Design) supports well designed sustainable development, which maintains and enhances the character of the District. It supports the use of brownfield land for development and the use of high-quality materials as well as ensuring that everyone can get around whilst providing on site landscaping to integrate the development into its wider surroundings. This policy is also supportive of schemes that incorporate sustainable features.

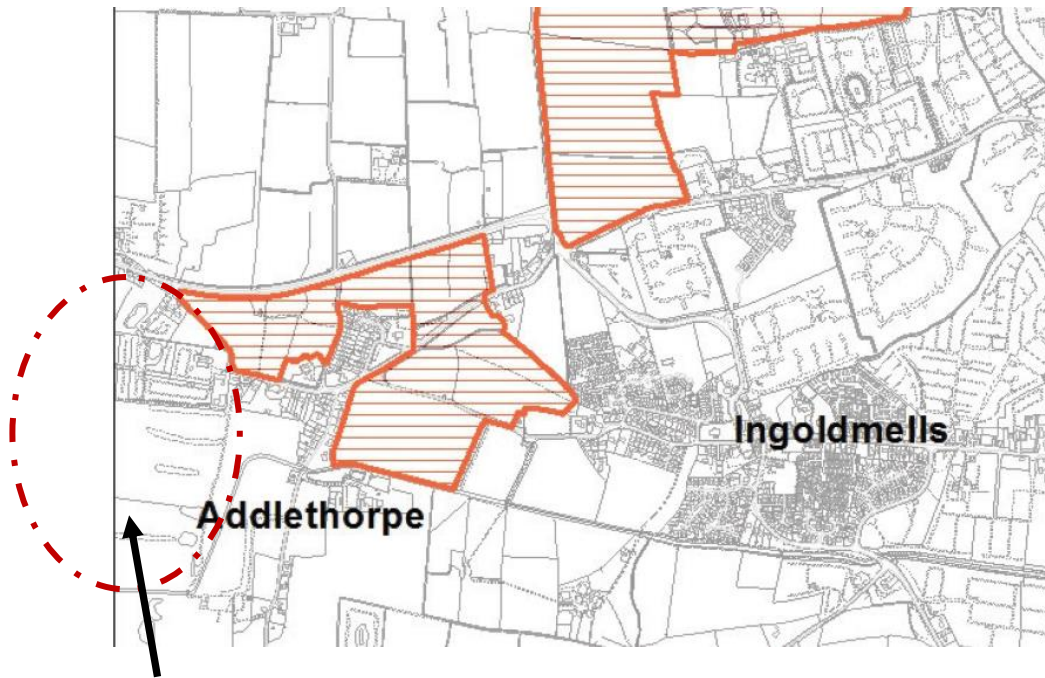
SP13 (Employment) seeks to support the growth and diversification of the local economy whilst strengthening the rural economy by supporting development in villages that provide local employment.

SP17 (Coastal East Lindsey) applies to the settlement of Addlethorpe and states that the Council will give a high priority to development that extends and diversifies all-year round employment opportunities, contributes directly to the local economy and diversifies the tourism market. Criteria 4 requires the demonstration that the Sequential and Exceptions Test with regards flooding are satisfied as set out in Annex 2.

SP19 Holiday Accommodation supports new and extensions to caravan development where it adjoins a town, large or medium village subject to satisfying listed criteria.

Criteria 4 states that no further caravan development will be permitted in the area between Ingoldmells and Addlethorpe to prevent further coalescence of these settlements and place a level of protection on this green open space as indicated in orange on the extract of the map below:





The approximate location of The Elms Caravan site and application site are indicated above which lies beyond the areas identified.

Criteria 5 states that the Council will support new and extensions to caravans, log cabins, chalets, camping and touring site development where sites adjoin or are in a town, large or medium village, providing it can be demonstrated that they add to the built and natural environment by the provision of extensive landscaping and green infrastructure, do not cause unacceptable harm to the wider landscape, protected or important habitats and they are connected to the existing settlement by road and footpath.

Criteria 6 identifies that the Council is supportive of caravan, log cabins, chalets and camping and touring sites in the open countryside only where it can be shown that these sites do not cause unacceptable harm to the character of the countryside, on the wider landscape, on protected or important habitats or species.

Criteria 7 restricts occupancy between 15 March and 31<sup>st</sup> October of any one year, or the following Sunday if the 31<sup>st</sup> does not fall on a Sunday.

Criteria 9 states that the Council will not support all year-round occupancy or permanent living in caravans in the coastal area.

SP 21 (Coastal Employment) lends support to development in the large, medium and small villages where it provides local employment and helps to support local services and/or re-uses building for rural business. This policy also supports farm diversification.

SP22 (Transport and Accessibility) supports development in or adjoining medium villages such as Addlethorpe where it is accessible to key facilities. This policy is also supportive of development that gives priority to pedestrian and cycle movements.

SP23 (Landscape) seeks to protect and enhance the District's landscape and supports proposals that allows for greater public access to the countryside and provides biodiversity objectives of the plan.

SP25 (Green Infrastructure) seeks to safeguard and deliver a network of accessible green infrastructure and will seek out opportunities to connect existing green infrastructure to improve the network of spaces and accessibility for both the local population and wildlife.

## **Planning considerations**

### Principle of development

The existing Elms Caravan Park provides around 280 pitches for touring caravans together with a growing number of static caravans, three facility blocks and a purpose-built reception building. The site is well established and screened from public view. The caravan park owners have frequently been asked by their customers for more and more static caravan pitch provision and to meet the demands of their customers and to remain competitive in a fierce holiday accommodation market, this proposal would involve the change of use of the final part of a former golf course site to provide an additional 56 new static caravan pitches to complement the existing caravan park offer and the earlier recently consented extensions, two of which are under construction. The proposal involves the re-use of a previously developed site and therefore complies with Sustainability Appraisal Objective 6.

The settlement of Addlethorpe falls within the 'Coastal East Lindsey' area and therefore Policy SP17 applies. SP17 gives a high priority to development that extends and diversifies all-year round employment opportunities, contributes directly to the local economy and diversifies the tourism market. SP17 also discusses matters of flood risk which are examined latter in this report.

SP19 supports extensions to caravan development where it adjoins a town, large or medium village subject to satisfying listed criteria. In relation to Criteria 4 the site falls beyond the zone where no further caravan development will be permitted in the area between Ingoldmells and Addlethorpe.

Turning to Criteria 5, the site adjoins the western edge of Addlethorpe and the site benefits from established existing landscaping from its previous use as a golf course. The development scheme however also includes the provision of further landscaping and green infrastructure and would not cause unacceptable harm to the wider landscape. This aspect is examined in further detail below. Furthermore, any notable habitats will be protected, and new habitats will also be created. As portrayed on the submitted plans the proposed caravan site extension will also be well connected to the rest of the settlement by road and footpath through The Elms adjoining caravan park.

The proposal therefore complies with the requirements of SP19 and is therefore acceptable in principle.

Impact on character of the area and landscape considerations

Policy SP19 supports new caravan site extensions where the site adjoins or is in a village provided, they add to the built and natural environment by the provision of extensive landscaping and green infrastructure and do not cause unacceptable harm to the character of the area and wider landscape.

SP10 supports well designed sustainable development that maintains and enhances the character of the District. This policy encourages the use of brownfield land for development whilst providing on site landscaping to integrate the development into its wider surroundings.

SP23 also seeks to protect and enhance the District's landscape and supports proposals that allows for greater public access to the countryside.

The application site is visually very well contained within a locality that is defined by a flat landscape. The pattern of development in this area has been described by an Inspector in a previous Appeal as scattered with sporadic pockets of housing widely distributed. The Inspector goes on to identify that on the whole the various holiday caravan parks that exist in the area are discreetly sited behind perimeter fencing or screening and are part and parcel of the wider area's character.

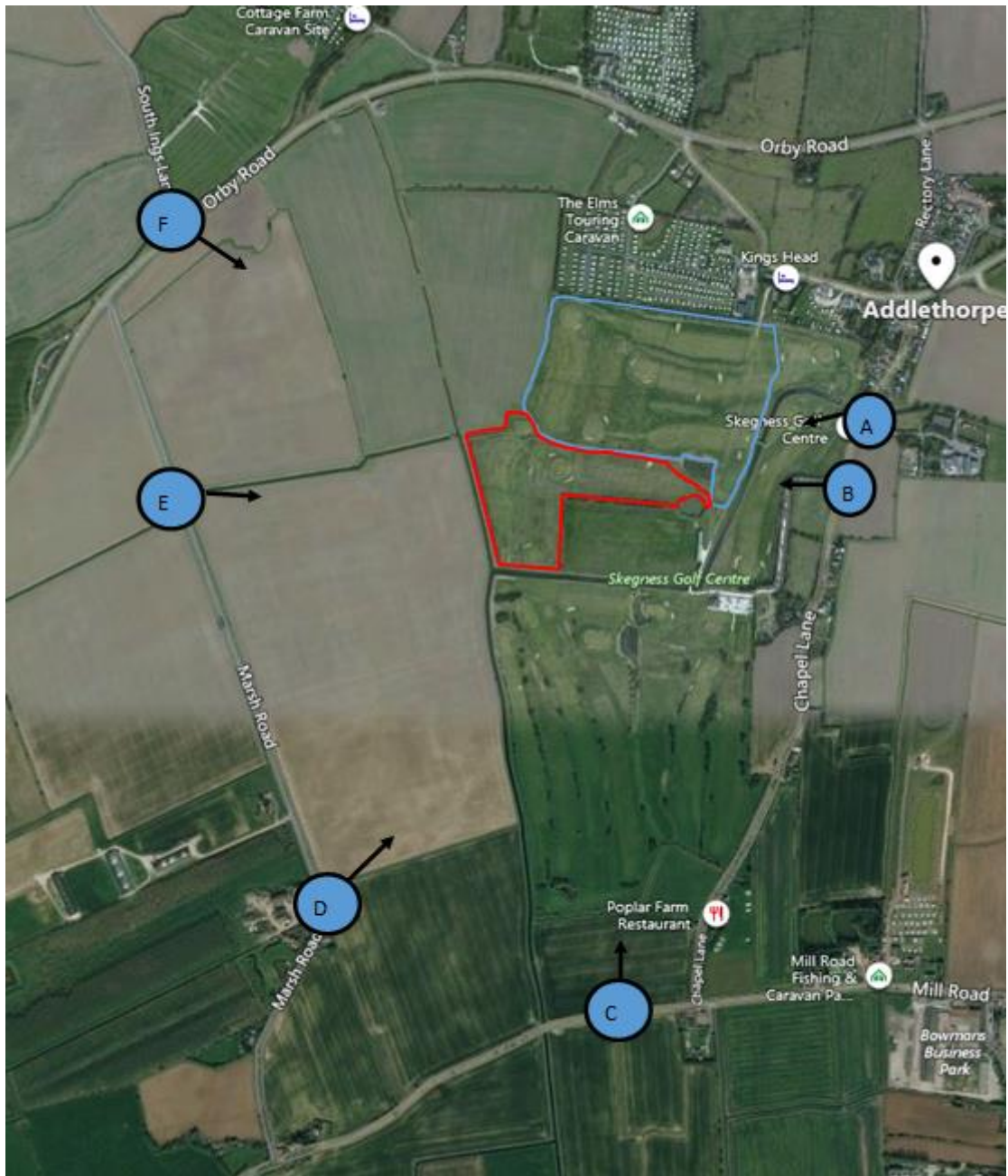
Given that embankments were formed and established and maturing shelter belts were planted in the mid-1990s as part of the former use of the site as a golf course, the site is generally very well screened from public view.

As the nature of the site is contained and very well screened on almost all site boundaries it is considered that the proposal would have a neutral or negligible impact on the character and appearance of the landscape and wider area. Areas of additional new green infrastructure are however proposed as illustrated on the submitted plans.

In terms of landscape and visual analysis, views looking towards the site from the wider area are considered below.



Viewpoint Map with approximate location of site indicated in red and earlier consented extensions in blue.



Viewpoint A: From the bridge over the Main Drain along Chapel Lane. Some very minor visual intrusion could be experienced but this will be mitigated by existing and new landscape planting.



Viewpoint B: From entrance to Skegness Golf Centre, Chapel Lane. Very negligible impact given the extensive and established landscaping at both the existing golf course site and also the former use of the site as part of the larger golf course.





Viewpoint C: from Mill Road Negligible impact given the distance away from the site and the extensive and established landscaping from the former use of the site as a golf course.



Viewpoint D: from Marsh Lane (south) opposite Whitehouse Farm, where the road bends. Negligible impact given the distance away from the site and the extensive and established landscaping from the former use of the site as a golf course.





Viewpoint E: from Marsh Lane (north) by the drain Limited impact given the distance away from the site and the extensive and established landscaping from the former use of the site as a golf course.



Viewpoint F: From junction of South Ings Lane and Orby Road. Negligible impact given the distance away from the site and the extensive and established landscaping from the former use of the site as a golf course.



As the above photographs illustrate the proposed caravan park extension would not result in any notable harm to the character and appearance of

the wider surrounding area. The limited views would be mitigated by new landscape planting to the eastern and western site boundaries. Furthermore, views of the caravan park extension would not be prominent when viewed from surrounding roads. The applicant is willing to accept a condition requiring the submission and approval of a landscaping scheme if deemed necessary. The scheme will therefore comply with Sustainability Appraisal Objective 2.

Social/Economic benefits and tourism.

Tourism is one of the largest industries in the UK. According to Visit Britain, tourism is predicted to grow by 3 percent (domestic demand growth per annum) and is estimated to be worth £257.4 billion by 2025. Additionally, tourism is a major employer within the UK and by 2025 is set to provide 3.7 million jobs (Source: VisitBritain).

In 2012 Roger Tym and Partners were commissioned by the British Holiday Home and Park Association (BH&HPA) to produce an independent report to examine the economic impact of the UK Holiday parks industry. Its purpose was to extrapolate the findings of a 2011 study into the holiday parks industry in Wales to cover the whole of the UK. The reports found the following in terms of total spend and total GVA per unit per year.

<b>Accommodation Type</b>	<b>Spend per year</b>	<b>GVA per year</b>
Rented static unit	£15,300 per year	£6,900 per year
Owner occupied static unit	£7,525 per year	£3,390 per year
Touring caravan pitch	£2,800 per year	£1,340 per year

As the above table demonstrates the total spend per year for a static unit generates considerably more revenue into the local economy that a touring pitch. There are approximately 280 touring caravan pitches at the Elms site which equates to a typical spend of £700,000 per year or £465,000 when converted to raw spend.

The three recent permissions in 2019, 2020 and 2021 were for 26, 27 and 41 static pitches respectively which based on the above equates to the following:

- 94 owner occupied static units would equate to an additional typical spend of £707,350 per year, or,
- 94 rented static units would equate to an additional typical spend of £1,422,900 per year.

This proposal seeks to change the use of a further part of the former golf course site to provide 56 new static pitches which based on the above equates to the following:

- 56 owner occupied static units would equate to an additional typical spend of £421,400 per year, or,
- 56 rented static units would equate to an additional typical spend of £856,800 per year.

The Elms Caravan Park, which is extremely popular, therefore contributes considerably to the local economy and the proposed further extension will allow notable further contributions to be made to the local economy.

In terms of employment generation, the Welsh report found in the study area that the jobs generated both directly and indirectly by the industry was 10,645 full time equivalent jobs. It was also established that for every 100 privately owned caravan holiday homes there are 11 full time jobs created and for 100 touring pitches there are 4 full time jobs created either on site or indirectly, offsite. The proposal will therefore provide diversity in the economy and encourage sustainable business development which in turn will enable tourism opportunities to be exploited. Sustainability Appraisal Objective 5 will therefore be met.

The scheme also promotes healthy lifestyles for people staying at the caravan site and a nature trail and outdoor gym formed part of an earlier approved scheme along with further fishing ponds. This proposal includes further fishing ponds and an extended nature trail will also be provided. The proposal therefore chimes with Sustainability Appraisal Objective 12.

### Design and Layout

The proposed layout will create a further 56 static caravan pitches that will be loosely laid out in an attractive low-density arrangement with direct access through the earlier consented extensions and existing caravan park. Similar to the recently granted extensions on the land to the north the layout proposed would provide a lower density than the more traditional caravan park existing layout. The space about and between each pitch is at least 6 metres and considered to be more than adequate and provides an acceptable level of privacy. The proposed layout would therefore provide a spacious, attractive and well-designed layout to complement the existing caravan park offer. Each pitch will have a dedicated parking area and will be sited on a permeable base for improved surface water drainage. The access road and impermeable hard surfaced parking areas will drain into fishing ponds, a drainage strategy is set out in the accompanying FRA.

### Ecology

As with the NPPF, SP23 also seeks to secure biodiversity objectives of the plan.

A Preliminary Ecological Impact Assessment has been carried out by RammSanderson and this has been submitted in support of the application. The findings of the report indicate that the site comprises a large area of poor semi-improved grassland with small areas of scattered trees, marginal



vegetation and tall ruderal. The site is bounded by ditches, drains and hedgerows.

The report identifies that great crested newt are considered likely absent from the site and no further surveys or mitigation are considered necessary to facilitate the proposals.

As the ditch located along the northern site boundary was assessed as suitable habitat for water voles, it is recommended that two water vole surveys are required with one between April-June and the other July-September. No other further ecological surveys are recommended.

The majority of habitats on the site were assessed as being generally of limited botanical interest and low ecological value.

Also accompanying this application is a Biodiversity Enhancement Plan (BEP) which sets out the biodiversity enhancements recommended with regards, hedgerow creation and enhancement, woodland tree planting and water features. It also recommends that bat and bird boxes be incorporated into the scheme, where possible. The BMP also recommends a management timetable, listed mix of species and the mix composition for each of the new biodiversity enhancement areas which can be secured as measurable net gains for biodiversity.

As shown on the submitted plans additional landscaping is proposed along both the east and western site boundaries which as well as providing screening benefits would also in turn provide ecological/biodiversity benefits as part and parcel of these development proposals. The areas of biodiversity will therefore be protected and enhanced and the proposal will therefore make a positive contribution in this regard and will chime with Sustainability Appraisal Objective 1.

The National Planning Policy Framework and local development plan encourages ecological enhancement of sites subject to development proposals. This can be achieved through the recommendations set out within the report, and the proposal will both protect and enhance the biodiversity and ecological value of the site.

### Flood Risk

Paragraph 159 of the Framework states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

Paragraph 161 of the NPPF sets out that in order to manage any residual risk, a Sequential Test should be applied and then, if necessary, the Exceptions Test.

Paragraph 162 indicates that the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source, and that development should not be allocated or permitted if there are *reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.*

The guidance continues at paragraph 163 stating that following the application of the sequential test, if necessary, for development to be located in zones with lower risk of flooding (taking into account wider sustainable development objectives), the Exceptions Test (ET) may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in national planning guidance.

Paragraph 164 of the NPPF states that the application of the exception test should be informed by a strategic or site-specific flood risk assessment. For the ET to be passed it must be demonstrated that the development would provide '*wider sustainability benefits to the community*' that outweigh the flood risk and a site specific FRA must demonstrate that the development will be safe for its lifetime taking into account of the vulnerability of its users, without increasing flood risk elsewhere and where possible will reduce flood risk overall. Furthermore, it states that both elements have to be satisfied for the development to be permitted (paragraph 165).

The Environment Agency's flood map shows that the site and surrounding locality is situated in Flood Zone 3 and is susceptible to flooding from extreme tidal events. There is therefore nowhere else in the settlement that has a lesser risk of flooding and could reasonably be developed.

The applicant has commission Roy Lobley Consulting to undertake a comprehensive and robust Flood Risk Assessment in support of these development proposals.

The FRA shows that the site and surrounding locality is situated in Flood Zone Zone 3 and is susceptible to flooding from extreme tidal events. As the FRA confirms the site is approx. 3 km from the east coast, where tidal flood defenses are in place. In light of the above it is considered that there is low risk of direct flooding from the North Sea. The residual risk of flooding from tidal sources is however high and will require mitigation.

The Assessment demonstrates that the site is not at risk of flooding from pluvial sources and risk of flooding from groundwater is low. It concludes by finding the proposed development not to be at significant flood risk. However, it goes on to list the recommended flood mitigation strategies that will need to be implemented.

The Elms Caravan Park is already registered with the Environment Agency Floodline Warnings Direct scheme. Furthermore, a flood warning and evacuation plan is in place. It is recommended that this is extended to cover the proposed development site. By way of mitigation, it is also recommended that the period of occupancy is restricted to reduce potential exposure to risk. This can be secured by planning condition in accordance with Policy

SP19. Finally, it is also recommended that caravan are securely fastened to the ground via chains fixed to in-situ concrete pads.

In terms of a sustainable drainage strategy, a surface water run off 'worse case' event is detailed. Working on the basis of a total impermeable area of approx. 5.600 sqm with an average annual rainfall depth in this location of 0.6.18m, the total average annual rainfall volume is calculated to be 3,460 cubic metres.

On the basis of the above it is considered that the five ponds proposed will hold a permanent depth of water and will be of a sufficient depth to allow the required storage above the retained water level.

In terms of foul drainage it is proposed to connect to the existing sewer.

The settlement of Addlethorpe falls within the 'Coastal East Lindsey' area and therefore Policy SP17 applies. Criteria 4 requires the demonstration that the Sequential and Exceptions Test with regards flooding are satisfied as set out in Annex 2.

Annex 2 lists development types which are deemed to have passed the sequential test. Static, touring and camping sites are included in this list and therefore the sequential test has been passed.

Turning to the exception test, the proposal would meet with the first part of the exceptions test as the development would provide wider sustainability benefits to the community that outweigh flood risk.

With regards to second part of the Exceptions Test the applicant is willing to accept a condition controlling the seasonal occupancy of the site. It is therefore considered that the development would be safe for its lifetime and therefore the Exception test is satisfied. Water resources will be effectively managed and flood risk will be minimised and mitigated, therefore the proposal meets with Sustainability Appraisal Objective 3 and 4.

### Access Considerations

Vehicular access to the proposed caravan park extension would be gained from the existing caravan park entrance, which is barrier controlled, and through the existing caravan park.

The long-established existing site presently provides provision for 281 touring pitches. There is also consent approved to replace 16 of the existing touring pitches with 14 static pitches. As a result, the number of touring pitches would be reduced to 265. Cumulatively and in addition to the above planning permissions have been granted for a total of 108 (14+26+27+41) static pitches. The existing and approved number of overall pitches (both touring and static) therefore amounts to 373 in total.

This proposal is for a further 56 static caravan pitches. This would result in the overall Elms Caravan Site offering provision for 265 touring pitches and 158

static pitches. Altogether the total number of combined pitches would amount to 423 in total.

This extension to the existing/approved site to provide an additional 56 further static pitches represents in our opinion a modest increase overall and would not give rise to a demonstrable increase in vehicles movements to and from the site.

The existing caravan park access arrangements would remain unaltered by these proposals. The present access on to the public highway which gained planning consent in 2000 is considered to be sufficient and acceptable to provide safe access to the proposed development.

An earlier consented caravan park extension secured a new pedestrian/cycle access connecting onto Orby Road which offers an alternative to walking through the existing caravan park which improves accessibility as advocated in Sustainability Appraisal Objective 7.

### Residential Amenity

The nearest dwellings are those that front onto Orby Road, a considerable distance from the application site. Separation distances are therefore considered to be acceptable. The site directly adjoins an existing caravan park and in view of the scale of development it is considered that the impact on amenity would be negligible.

A generous amount of space would remain about and between the proposed static caravans in the interests of privacy and amenity. It should also be noted that as indicated on the site location plan the adjoining dwellings are in the ownership of the applicant.

### **Conclusion**

At the heart of the NPPF is a presumption in favour of sustainable development. Development that is sustainable should go ahead. The scheme would constitute sustainable development and would result in social, economic and environmental benefits as detailed above.

The proposal would provide an extension to an existing caravan park amounting to 56 new static caravan pitches. The site adjoins the settlement of Addlethorpe and would increase the caravanning offer at an existing established and successful business. The applicants are regularly asked by existing customers and also by new enquiries if they will be providing further static caravan provision on site. Therefore, to retain existing customers and compete in a fierce market the business needs to adapt and diversify. These proposals provide a clear benefit in economic terms and will boost the level of tourism in this area. Visitors to the site will utilise local facilities within the village and along the coast in general and will therefore contribute to the



local economy both through direct and indirect spending. The caravan site is well positioned in reasonable walking and/or cycling distance to the coast.

In terms of environmental considerations, the Flood Risk Assessment demonstrates that the development would not be at significant risk of flooding and would not increase flood risk to other areas.

Turning to environmental impacts, it is considered that this proposal will have a neutral impact on the character of the wider area. As part of the scheme further areas of landscape planting will be created at the western and southern most edge of the site. A wildflower meadow area will be created as well as five wildlife sensitive fishing ponds are also proposed. Cumulatively these are offered with the primary objective of delivering, as part of these proposals, net gains for biodiversity.

In conclusion, it is considered that the benefits outweigh any perceived harm to the local environment. The proposed development is therefore wholly consistent with the NPPF and the Development Plan It is therefore considered that planning permission for this detailed application should be permitted.

April 2022