

# PLANNING STATEMENT

Proposed Regeneration Project

The Elms Golf Centre, Wainfleet



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## DOCUMENT HISTORY

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Andrew Clover Planning and Design Ltd  
T: 01507 307485  
[mail@andrewcloverplanninganddesign.co.uk](mailto:mail@andrewcloverplanninganddesign.co.uk)

Andrew Clover Planning And Design Ltd is registered in England and Wales, Company Registration No: 13674950.  
VAT Number: 392355773. Registered Office: 1 Jacklin Drive, Saltfleet, Lincolnshire, LN11 7UJ

## 1 INTRODUCTION

- 1.1 This Statement accompanies a planning application for the regeneration of the Elms Golf Centre, Croft Bank, Wainfleet.

## 2 THE SITE & SURROUNDINGS

- 2.1 The application site is the Elms Golf Centre and until relatively recent it included facilities such as a 9-hole golf course and a driving range. The golf facilities, including the club house restaurant, are no longer in use and the golf course and driving range are now in poor condition. Part of the site is currently used for the sale of touring caravans and motorhomes. Although the site is within the parish of Croft, it is within the settlement of Wainfleet All Saints. It is on the northern edge of the village (Figure 1) and is accessed via Croft Bank, just off the main Boston to Skegness Road (A52).



**Figure 1:** Aerial photograph showing the location of the site in relation to Wainfleet.

- 2.2 To the south of the site are a number of large, dilapidated greenhouses. To the east is a business park comprising of a number of industrial type buildings. The Wainfleet Relief Channel runs along the northern site boundary and beyond this is agricultural land. To the west is a paddock which is partly used for caravan storage and to the

northwest is a larger area of caravan storage and a certified camping site. The majority of the boundaries are formed by mature tall landscaping which provides an effective screen and restricts views into the site from the surrounding areas.



**Figure 2:** Aerial photograph showing the site in more detail.

- 2.3 The site is in Flood Zone 3. A separate Flood Risk Assessment has been produced and accompanies the application.

### 3 THE PROPOSAL

- 3.1 The proposal is to regenerate the site to provide a high-quality facility for local residents and for visitors to the area. As can be seen in Figure 3, the proposal involves the following elements:

- Erection of a building comprising of 10 no. business/commercial/retails units.
- Display areas for the sale of touring caravans and motorhomes.
- Excavation of 2 no. fishing lakes and 2 no. wildlife ponds.
- Creation of 48no. touring caravan and motorhome pitches.
- Erection of 6 no. bespoke two storey lakeside holiday lodges.
- Erection of a toilet/shower block and erection of a maintenance/machine store.
- Construction of internal access roads and a car park.
- Widespread planting of native trees throughout the site.



**Figure 3:** The proposed site layout plan.

## 4 PLANNING POLICY

- 4.1 Policies within the East Lindsey District Council Local Plan (2018) that are relevant to this proposal include:

SP2 Sustainable Development  
SP10 Design  
SP13 Inland Employment  
SP15 Widening the Inland Tourism and Leisure Economy  
SP16 Inland Flood Risk

- 4.2 There are numerous paragraphs within the National Planning Policy Framework (NPPF) which are in support of the proposal. For example, paragraph 84 states that:

*'Planning policies and decisions should enable: c) sustainable rural tourism and leisure developments which respect the character of the countryside...'*

- 4.3 At the heart of the NPPF is a presumption in favour of sustainable development. For decision taking this means *'Approving development proposals that accord with an up-to-date development plan without delay'*. In decision making this means Local Planning Authorities should work proactively with applicants to secure developments that will improve the economic, social, and environmental conditions of the area.

- 4.4 These three overarching objectives of sustainable development (economic, social, and environmental) are interdependent and need to be pursued in mutually supportive ways. The proposal will be of significant benefit to the local economy through both the commercial/retail units and the overnight accommodation. This will be achieved by a development which regenerates an existing facility whilst being sensitive location and setting. Overall, the combined benefits of the proposal weigh in the favour of the proposal and meets the requirements of sustainable development.

- 4.5 Paragraph 81 requires planning policies and decisions to help create the conditions in which businesses can invest, expand, and adapt. It states that:

*'Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.'*

- 4.6 The main planning matters to be considered in this case are the principle of development, character, amenity, highways impacts and flood risk.

## PRINCIPLE OF DEVELOPMENT

- 4.7 Although the site is within Croft parish, it is within the settlement of Wainfleet All Saints. The application site lies within Flood zone 3 but is excluded from the coastal 'hazard areas' as defined by the Environment Agency and as shown on page 85 of the Local Plan. Therefore, the Coastal policies of the Local Plan are not applicable. As such SP16 (Inland Flood Risk) is applicable and this needs to read in conjunction with other Plan policies including SP15 (Widening the Inland Tourism and Leisure Economy). Although not subject to coastal flood areas, the site could be affected by fluvial flooding as the River Steeping is just over 1km to the south and the Wainfleet Relief Channel is adjacent the northern site boundary.
- 4.8 Policy SP1 (A Sustainable Pattern of Places) classifies Croft village as a 'medium' sized village and Wainfleet all Saints as a 'Large Village' in recognition that it provides a range of services and facilities catering for its own needs and those of nearby smaller villages. In the context of East Lindsey, 'Large Villages' are a second-tier hierarchy settlement.
- 4.9 SP13 (Inland Employment) states at subsections 4-6 that the Council will support growth and diversification of the local economy by

*4. Supporting proposals which bring forward employment land in or adjoining the large villages across the District.*

*5. Supporting new employment land elsewhere where it is in or adjoining a settlement or is an extension to an existing employment use and can be easily connected to the road network and is integrated into its setting in terms of layout and landscaping.*

*6. Strengthening the rural economy by supporting in the large, medium and small villages:*

- Development where it can provide local employment.*
- The re-use of buildings for rural business.*

The site is ideally located on the edge of a large village, almost directly off the A52 and close to two other business parks. Together with providing opportunities for local employment it is considered that the proposed commercial/retail units accord with the aims of SP13.

- 4.10 SP15 subsection (1) offers broad support for quality tourism facilities where they:

- Extend and diversify the tourism and leisure economy, and provide additional employment opportunities;*
- Provide opportunities for the enjoyment of the District's wider countryside and historic towns and villages;*
- Do not cause unacceptable harm to the landscape, biodiversity or heritage assets;*
- Are of a scale and intensity compatible with their surroundings*

In this case, the proposed lakeside holiday lets, and touring/motorhome pitches will add to the range of accommodation types within the area. Because of the flood risk situation, the proposal will also provide year-round accommodation, helping the local economy and increasing the potential for year-round employment. The location of the site is ideal for people to explore Wainfleet by foot and the presence of the train station and the A52 make it possible for visitors to explore both the coast and the countryside. This can all be achieved in a way which does not harm the character of the area and the setting of the village. In fact, the proposal will be of benefit to the character of the area as the site is in a poor and run-down condition and needs upgrade and improvement.

4.11 SP15 subsection (3) states that the Council will:

*'support new and extensions to caravans, log cabins, chalets, camping and touring site development where sites are in close proximity to 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, heritage assets and their settings, and they have safe access to the relevant settlement with vehicles and pedestrians being segregated'.*

In this case the site is in close proximity to the large village of Wainfleet all Saints and is connected to it by roadside footpaths. It is also ideally placed for people approaching the site by car as the entrance is located just off the A52 (the main route between Boston and Skegness). It already benefits from mature landscaping to the outer boundaries which prevents views into it and a significant scheme of tree planting is proposed throughout the development. As such there will be no visual harm to the character of the surrounding area and there are no listed buildings in close proximity.

4.12 Overall, taking SP13 and SP1 as a whole, it is considered that the principle of the development is acceptable.

#### FLOOD RISK

4.13 Although the site is not within the Coastal Zone as defined by page 85 of the Local Plan, it is within Flood Zone 3. SP16 is therefore relevant. It states at sub-section 1 that the Council will:

*'support development for business, leisure and commercial uses in areas of inland flood risk where it can be demonstrated that accommodating the development on a sequentially safer site would undermine the overall commercial integrity of the existing area. Such developments must incorporate flood mitigation measures in their design'.*

It also reiterates the need for a site-specific Flood Risk Assessment to be submitted.



- 4.14 With regards to the sequential test, the site is an established visitor facility (albeit now closed) in need of redevelopment and therefore sequentially it cannot be located anywhere else. Furthermore, when considering the sequential test in the Coastal Zone, Annex 2 of the Local Plan deems new and extensions to holiday sites to automatically pass the sequential test. Although not explicitly related to inland sites within Flood Zone 3, it is reasonable to apply the same standard given that it is at a lesser risk than the Coastal area. Given these factors, the sequential test is passed.
- 4.15 With regards to the exception test, for the same reasons as above it is considered that the first part of the test (community benefit) is passed for the holiday accommodation elements of the scheme. In relation to the commercial elements, these will provide an economic benefit to the area and provide year-round employment opportunities. Together with the enhancement of the site these are seen as significant benefits for the community which outweigh the risk of flooding. In relation to the second criterion, this submitted Flood Risk Assessment contains a number of mitigation measures that will ensure the development is safe and will not increase risk elsewhere.
- 4.16 As the submitted Flood Risk Assessment demonstrates that the risk from flooding can be addressed, and the Local Plan provides policies which support the type of development proposed in the flood zone, it is considered that the proposal is acceptable in terms of flood risk.
- 4.17 In relation to drainage, the site is already connected to the drainage network, and it is believed that there is sufficient capacity to accommodate the foul waste from the development. In relation to surface water, the permeability of the site will be maintained wherever possible. The proposed holiday lets will discharge surface water into the proposed ponds whilst any runoff from the touring/motorhome pitches will also run off into the new ponds and lakes. Surface water from the commercial/retail units will be attenuated below ground and release into either the proposed ponds or into one of the nearby watercourses.

#### IMPACT ON CHARACTER AND THE WIDER LANDSCAPE

- 4.18 As previously stated, Policy SP15 supports holiday sites in the countryside providing they do not cause unacceptable harm to the character of the countryside, on the wider landscape, on protected or important habitats or species. This is reiterated in Policies SP10 and SP23 which support well-designed sustainable development, which maintains and enhances the character of the district's countryside.
- 4.19 As previously discussed, the majority of the site boundaries are formed by mature tall trees and hedges which provide an effective screen and restrict views into the majority of the site from the surrounding areas. This landscaping will be retained and

strengthened where necessary and a significant amount of tree planting will be carried out throughout the development. The proposed commercial/retail building will be built in bricks and have a tiled roof. The appearance is considered more appropriate for the site in the context of the village. Overall, it is considered that the proposal will cause no unacceptable harm on the character of the area.

#### AMENITY

- 4.20 Paragraph 130 of the NPPF expects development to result in a high standard of amenity whilst SP10 also seeks appropriate assessment regarding impact on residential amenities.
- 4.21 In this case there are only two residential properties close to the site, located between the southeast boundary and the A52. The development proposed closest to these properties is the block of 10 no. commercial/retail units. As these face into the site, they will not overlook the properties and there will be minimal noise disturbance. The other elements of the development, largely the holiday accommodation and touring/motorhome pitches, have mainly commercial or tourism uses on the adjacent land. Therefore, although the usage of the site will be increased, the development will not harm the amenity of nearby uses.

#### HIGHWAYS

- 4.22 Paragraph 110 of the NPPF states it should be ensured *that 'safe and suitable access to the site can be achieved for all users'*. Paragraph 111 continues by stating that *'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe'*. Paragraph 112 is also relevant giving criteria and considerations to ensure appropriate accessibility and movement.
- 4.23 This national policy is reflected in Local Plan policy SP10 which states that it will support well-designed sustainable development, which maintains and enhances the character of the towns, villages, and countryside by (amongst other criteria) ensuring it is easy for everyone to get around by incorporating safe and attractive roads, cycleways and footways that enable people of all abilities to access shops, jobs, schools, and other community facilities. SP22, amongst other criteria supports development that gives pedestrian and cycle movements priority.
- 4.24 In this case the site is ideally located, with the vehicular access almost directly off the A52. In addition, there is a footpath link into the centre of the village where not only can shops and facilities be accessed but there is also a train station. A small section of roadside path (approximately 50m) would be installed as part of the development to

connect to the existing footpath network. There is also a bus stop approximately 130m from the site entrance where regular services to Boston and Skegness are provided.

- 4.25 With the access being immediately off the A52 it is unlikely that vehicles will approach the site through the village. Therefore, the highways impacts on the village should be minimal.

## 5 CONCLUSIONS

- 5.1 The proposal seeks to regenerate The Elms to provide a mix of facilities that will be beneficial to local residents and visitors to the area. Both the NPPF and Local Plan policies support this and although it is located in Flood Zone 3 (not coastal flooding), subject to the recommended flood mitigation measures being implemented there will be no risk to life or property as part of this development. The proposal will also not result in an adverse impact such as on the character of the area or on amenity. As such this significant regeneration project can be granted planning approval.