

Abbie Marwood
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By email: [REDACTED]
By email: development.control@e-lindsey.gov.uk

Date: 20 December 2023
Our ref: 66553/05/NT/NM/27239476v3

Dear Abbie

Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as updated)

Land to the West of Butlin's Skegness, Ingoldmells, Skegness

On behalf of our client, Butlin's Skyline Limited ('the Applicant'), we request that East Lindsey District Council ('the Council') provides a formal screening opinion to confirm if it considers that an Environmental Impact Assessment ('EIA') is required in respect of development of land to the west of Butlin's Skegness to provide static caravan pitches and related facilities ('the Proposed Development'). This request is made in pursuance of Regulation 6 of the Town and Country Planning (EIA) Regulations 2017 (as updated) ('the 2017 Regulations').

This submission meets the requirements of Regulation 6(2) of the 2017 Regulations as set out below:-

Table 1: Requirements for Screening Requests under Regulation 6(2) of the 2017 Regulations

Regulation 6(2) Requirements	Conformity
A plan sufficient to identify the land	Yes
A description of the development, including in particular:- i) A description of the physical characteristics of the development and, where relevant, of demolition works; ii) A description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected	Yes
A description of the aspects of the environment likely to be significantly affected by the development	Yes
To the extent the information is available, a description of any likely significant effects of the Proposed Development on the environment resulting from:- i) the expected residues and emissions and the production of waste, where relevant; and ii) the use of natural resources, in particular soil, land, water and biodiversity	Yes
Such other information or representations as the person making the request may wish to provide or make, including any features of the Proposed Development or any	Yes

Regulation 6(2) Requirements	Conformity
measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.	

To enable your consideration of this issue, we set out below the following information:-

- 1 Description of the Site and its surroundings;
- 2 Description of the Proposed Development; and
- 3 Review of the requirement for an EIA.

Item 3 is dealt with by reviewing the Site and its surroundings and a consideration of the issues set out in the 2017 Regulations.

This request for a Screening Opinion is accompanied by the Site Location Plan (Ref: 4848-105) at Annex 1 to this letter. It identifies the extent of the Site which is the subject of this screening request outlined in red and other land within the Butlin's Skegness resort outlined in blue.

To summarise, we consider that the Proposed Development will not give rise to a need for EIA. We outline below the analysis undertaken to reach this conclusion.

1. Description of the Site and its Surroundings

The Site encompasses an area of approximately 29.5 hectares; the majority of which is in agricultural (arable) use with an area to the east comprising scrubland/grassland. The site is flat and low lying with few landscaping or built features.

To the east of the Site is the existing Butlin's Skegness resort with existing static caravans located along the full length of the eastern boundary. The existing resort covers an area of approximately 107 hectares and has been in existence since 1936. A range of leisure facilities are located along the beachfront along with accommodation blocks. The areas of static caravan pitches are to the west and beyond the A52 Roman Bank Road which runs north-south through the centre of the resort.

To the south is 'The Woodlands Lodge' touring caravan park with plots marked out for users with the 'Days to Remember' touring caravan park located to the south-east. Immediately to the west of 'The Woodlands Lodge' park and to the south of the Site is the Ingoldmells Water and Waste Water Treatment Plant which is operated by Anglian Water. An underground piped connection runs to the Treatment Plant from the north and through the western area of the Site.

To the west and immediate north of the Site are further areas of arable farmland. To the north, and beyond the farmland are further areas of static and touring caravan pitches running along the coast (not owned or operated by the applicant); and the settlement of Ingoldmells set back circa 1.5km from the coastline and approximately 900 metres to the north-west of the Site. The theme park rides of Fantasy Island (circa 450 metres to the north of the Site nearest point to nearest point) project above the static caravans to the north and are visible from the Site and the surrounding area.

Vehicular access to the Site is secured from Skegness Road to the north; immediately adjacent to the access point is Beacon Pharmacy and associated car parking area. A single track route extends from the access towards the existing Butlin's Skegness resort albeit access is currently restricted with a locked

gate. Other routes in the area are Wall's Lane which runs east-west to the south of the Site and Bolton's Lane to the west.

2. Description of the Proposed Development

The Proposed Development is being brought forward in outline and will seek planning permission for circa 378 static caravan pitches (each pitch comprising 4.2 metres x 13.4 metres or 14 foot by 44 foot). The pitches will be laid out over the western portion of the Site with the eastern portion being largely retained as a landscape and ecological enhancement area. A green landscaped buffer will be located around the perimeter of the Site. Small areas of play will be included as part of the masterplan.

Access will be secured from the existing entrance from Skegness Road with the route passing to a central facilities area which will provide additional facilities for the caravan occupants. The Proposed Development will include car parking for 96 vehicles and cycle parking for 225 cycles; a parking space will also be provided adjacent to each static caravan. Pedestrian and cycle routes will be provided. All vehicles will enter and exit via the Skegness Road access.

A plan is provided at Annex 2 to this letter (Ref: 4848-271 Rev A) which shows the current emerging illustrative layout for the Proposed Development.

3. Review of Requirement for an EIA

The Proposed Development is one to which the 2017 Regulations apply because it falls within Part 12(e) (Permanent camp sites and caravan sites on sites of over 1 hectare) of Schedule 2. Because of its relationship to the existing Butlin's Skegness site, it could also be considered to fall within Part 13(b) of Schedule 2 which relates to alterations or extensions of development falling within other categories of Schedule 2 where that development is "*already authorised, executed or in the process of being executed*".

For Schedule 2 developments, the 2017 Regulations require that an EIA be undertaken where "*the development is likely to have significant effects on the environment by virtue of factors such as its nature, size or location*".

In determining whether a development is likely to give rise to significant environmental effects, reference should be made to the selection criterion Schedule 3 of the 2017 Regulations, which are:-

- 1 **Characteristics of the development** (such as size, cumulative effects, use of natural resources, production of waste, pollution and nuisances, risks of accidents and risks to human health);
- 2 **Location of the development** (by reference to the environmental sensitivity of the area); and
- 3 **Types and characteristics of the potential impact** (having regard in particular to the extent of the impact, its trans-frontier nature, magnitude and complexity, probability and duration, frequency and reversibility).

It should be noted that the Government's Planning Practice Guidance ('PPG') provides guidance on the key environmental issues to consider in respect of schemes including permanent camp sites and caravan sites; it identifies visual impacts, impacts on ecosystems and traffic generation for specific consideration.

The PPG also states that EIA should not be a barrier to growth and will only apply to a small proportion of projects considered within the town and country planning regime. Furthermore it is acknowledged that only a very small proportion of 'Schedule 2' developments will require EIA [PPG ID: 4-018-20170728].

Development characteristics

The Proposed Development results in the change of use from a current agricultural field to a caravan site with associated infrastructure and facilities. The caravans are low level and will not be discernible from long distances; the Site will also be surrounded by a landscape buffer on the exterior boundaries to limit views of the caravans. The Proposed Development will be read in conjunction with the overriding character of the local area which is predominantly that dominated by similar low lying static caravan development. It will be in keeping with the overall character of this area and will not be visually obtrusive.

The Proposed Development includes immediate facilities required for visitors within a central facilities building(s). The facilities on site and cycle and pedestrian routes will reduce the requirement of visitors to use the private car once at the Site. The traffic associated with the Proposed Development is not likely to give rise to significant environmental effects associated with traffic.

The Proposed Development has been designed to protect, extend and enhance the existing area of scrubland to create a new ecologically diverse feature which will enhance biodiversity of the Site.

As a result of the above, the development characteristics are not considered likely to give rise to significant environmental effects either by itself or in conjunction with the existing resort that would require an EIA.

Environmentally sensitive location

The Site is not located within or immediately adjacent to an environmental sensitive location as defined by the 2017 Regulations. The nearest designated sites are located east of the Site boundary with the Greater Wash Special Protection Area ('SPA') boundary approximately 800 metres to the east and the boundary of the Inner Dowsing, Race Bank and North Ridge Marine Protection Area ('MPA') (a Special Area of Conservation) located approximately 2km to the east. Both designated areas relate to the marine environment.

The Greater Wash is classified for the protection of red-throated diver (*Gavia stellata*), common scoter (*Melanitta nigra*), and little gull (*Hydrocoloeus minutus*) during the non-breeding season, and for breeding Sandwich tern (*Sterna sandvicensis*), common tern (*Sterna hirundo*) and little tern (*Sternula albifrons*). The Inner Dowsing, Race Bank and North Ridge MPA's designation relates to a wide range of sandbank types and biogenic reef.

The area between the designated sites and the Site which is the subject of this screening request is occupied by the existing Butlin's Skegness resort comprising similar static caravan pitches and other accommodation, alongside a range of other local facilities. It is not considered likely that the development of the land to the west of the resort through the Proposed Development would give rise to significant effects in relation to the designated sites that would result in the need for an EIA.

Environmental effects

A range of technical work has been undertaken to inform the masterplan for the Proposed Development and, as described under 'Development Characteristics' a range of measures have been embedded into the proposals to limit the potential for adverse environmental effects and enhance the environmental conditions of the Site.

Early ecological survey work identified the eastern area of the Site as having some interest due to the presence of biodiverse grassland species. The Site may also have some interest for over-wintering birds. The plan at Annex 2 identifies that the Proposed Development will retain and extend the eastern area of the Site with new planting and other ecological enhancements. Species surveys are continuing, but the importance of the Site is unlikely to be diminished as a result of the Proposed Development due to the retained and improved habitat and the availability of other opportunities for bird species in the surrounding area (including agricultural fields to the west). Likely adverse significant effects are not expected from an ecological perspective.

The existing road junction into the Site from Skegness Road has been assessed and is adequate to accommodate accessibility to the Site for the anticipated number of visitors. Analysis has indicated that capacity exists to accommodate up to 950 additional pitches and the Proposed Development includes less than half of the quantum. A Staff Travel Plan will be prepared in association with the Proposed Development to encourage staff to use modes other than the private car; the Plan will also cover visitors and encourage the use of enhanced pedestrian and cycle routes to access the main resort facilities to the east. Provision will be made for electric vehicle charging within the Site. It is not anticipated that likely adverse significant effects will arise in respect of transport.

As transport effects are not likely to give rise to likely adverse effects, it is not anticipated that there will be likely adverse significant effects in respect of air quality arising from transport in the area. There are no Air Quality Management Areas within the vicinity of the Site. Plant and machinery required as a result of the Proposed Development will be selected to ensure that it does not give rise to adverse air quality effects. It is not anticipated that likely adverse significant effects will arise in respect of air quality. The effect of any odour from the adjacent Waste Water Treatment Works will be considered as it relates to future visitors to the Site; however any effects are not as a result of the Proposed Development and are therefore not relevant to this EIA screening process.

As set out above, the visual effects of the Proposed Development are unlikely to be significant. The area within which the Site is located is flat and long range views are limited. At a local level, the units will be viewed in the context of the existing surroundings which are occupied by similar permanent static caravans. The masterplan for the Site includes a substantial landscaped buffer to limit the impact of views of the Proposed Development. It is not anticipated that likely adverse significant effects in respect of landscape and views will arise.

In common with much of the Lincolnshire coastline, the Site is located within Flood Zone 3 which has a high probability of flooding from rivers or the sea; however the area is also protected by flood defences. Sustainable drainage has been included as part of the Proposed Development with swales and water features designed to accommodate the water environment within the masterplan. The Proposed Development will not increase the risk of flooding elsewhere. The units will be anchored to the ground and raised to seek to ensure that the finished floor level is above any potential flood levels. A flood

evacuation plan for workers and visitors to the Site will be put in place to reduce the risks of accidents and disasters. It is not anticipated that likely adverse significant effects will arise in respect of the water environment including flood risk.

The Proposed Development will give rise to the loss of agricultural land within ALC Grade 3 (Good to Moderate); however substantial additional agricultural land exists to the west. The loss is also not within the two highest categories (ALC Grades 1 and 2). There will not be a loss of valuable agricultural land which does not otherwise exist within the area. No likely significant effects are therefore anticipated in respect of soils.

Cumulative Effects

Best practice dictates that cumulative assessments of this nature should have regard to those schemes which are 'reasonably foreseeable' (i.e. usually those under construction or with planning permission, as specified in guidance such as IEMA's "Guidelines for Environmental Impact Assessment" (2004) and the EC's "Guidelines for the Assessment of Indirect and Cumulative Impacts as well as Impact Interactions" (1999)). This is further clarified in the Planning Practice Guidance (Environmental Impact Assessment) which states that:

"The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development" [our emphasis] (ID: 4-024- 20170728) (last updated 28 July 2017).

It is not considered that there are existing or approved development which, when considered alongside the Proposed Development would give rise to additional likely significant environmental effects which have not been otherwise considered above.

4. Conclusions

From the analysis set out above and our initial assessment of the Proposed Development and possible environmental impacts in the context of the 2017 Regulations, it is considered that the Proposed Development will not give rise to likely significant environmental effects giving rise to a need for EIA. This conclusion is reached when the Proposed Development is considered both in its own right or in combination with the existing Butlin's Skegness site.

Notwithstanding the above, any future planning application for the Proposed Development will be accompanied by a range of technical documentation which confirm the conclusions reached above. This will include a Landscape and Visual Impact Assessment, Flood Risk Assessment and Drainage Strategy, Ecological Appraisal and Assessment, Transport Assessment and Arboricultural Impact Assessment.

We trust that you have sufficient information to determine whether this is an EIA development under the Town and County Planning (Environmental Impact Assessment) Regulations 2017 (as updated). From these Regulations, we note that the local authority has three weeks (beginning from the date of receipt) to form a screening opinion and to provide the main reasons for this opinion having regard to the relevant criteria listed in Schedule 3. If adopting a negative screening opinion, we note that the LPA must also state any features of the Proposed Development and measures envisaged to avoid and prevent what might have otherwise been, significant adverse effects on the environment.

LICHFIELDS

Please contact me if you have any queries.

Yours sincerely



Nicki Mableson

Planning and EIA Director

BA (Hons) BPl MRTPI PIEMA

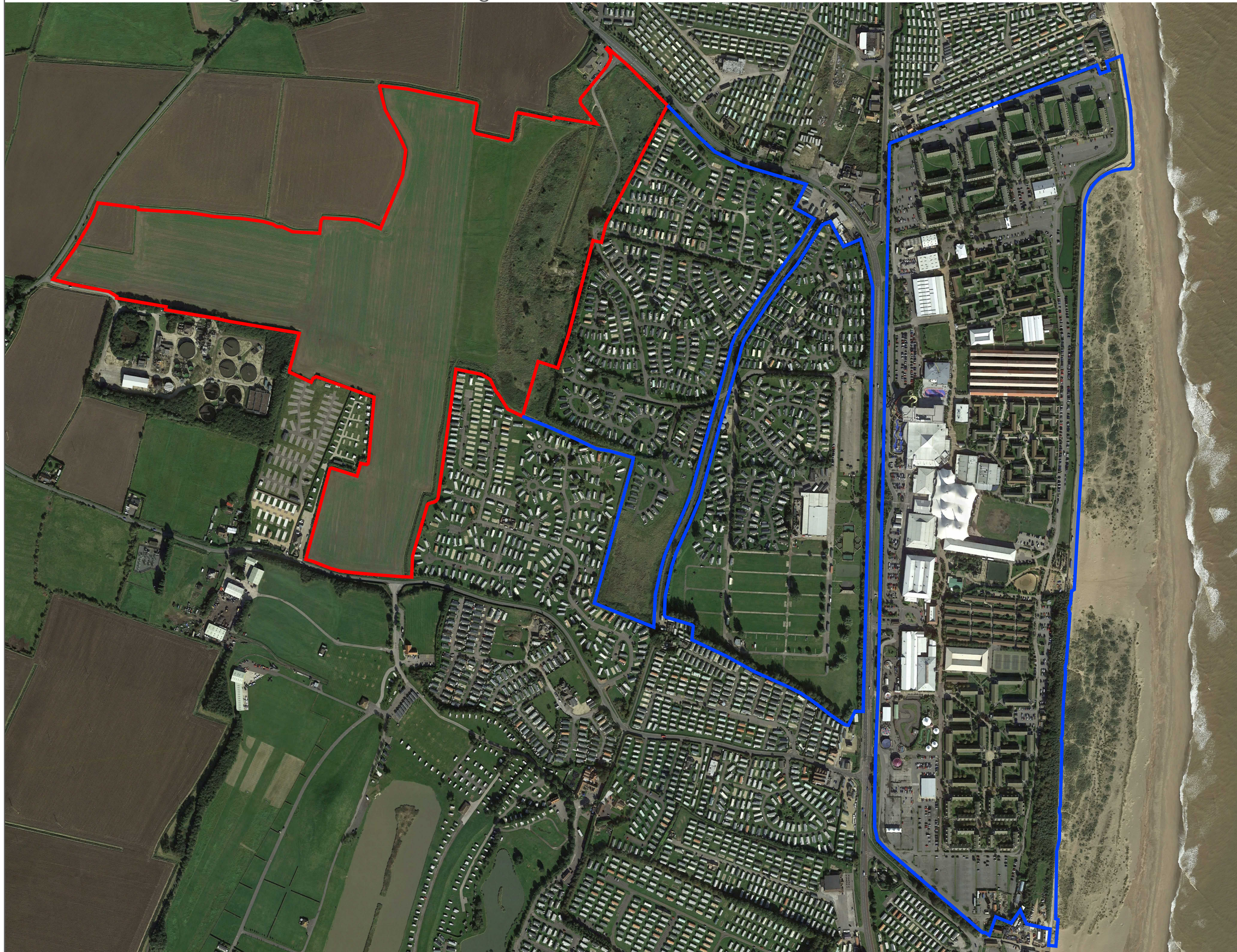
cc: **Mike Gildersleeves**, Assistant Director – Planning & Strategic Infrastructure
[mike.gildersleeves@boston.gov.uk]

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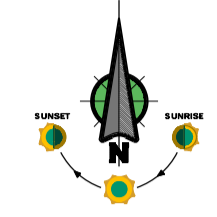


Annex 1: Site Boundary Plan

Butlin's Caravan Village Skegness - Existing Overall Plan



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Legend

- Site Ownership Boundary
- Site Boundary

Rev.	Details	Name	Date

A & M

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Client: **Butlin's Skyline Limited**

Site Address: **Butlin's Caravan Village Skegness
 Ingoldmells, Skegness
 PE25 1NJ**

Project: **Proposed Development
 of Adjoining Land**

Drawing Title: **Existing Overall Plan**

Date: **Dec 2023** Scale: **NTS@A1** Drawn: **NK**

Computer File Name: **4848-118 - SKEGNESS ADJOINING LAND - EXISTING SITE PLANNING** Checked By: **-**

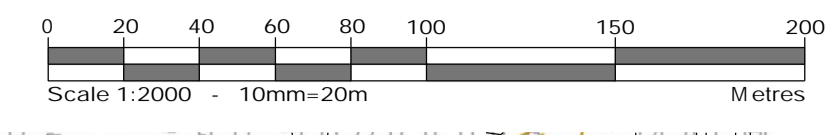
Status: **Existing**

Drawing Number: **4848-105** Revision: **-**

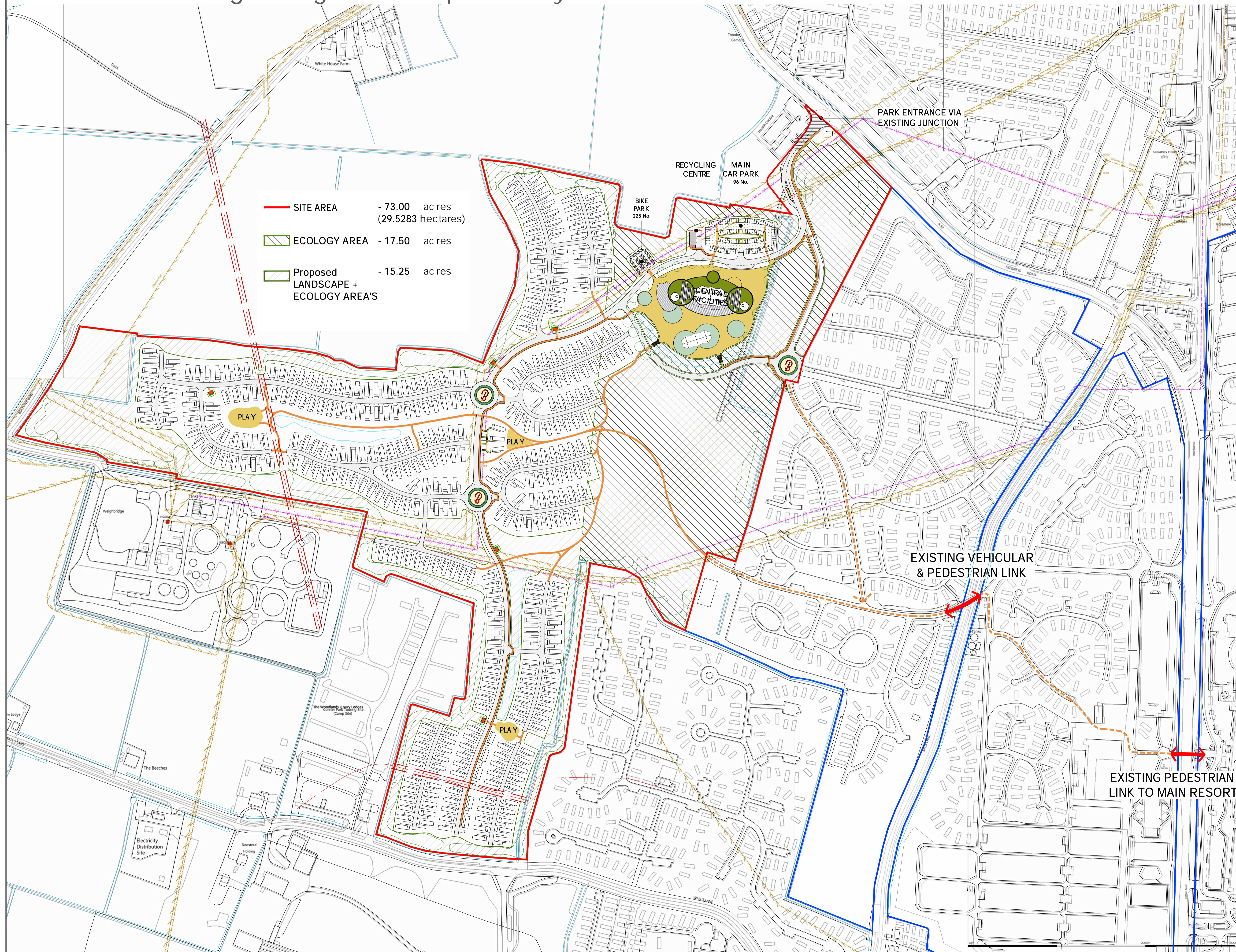


Annex 2: Draft Illustrative Masterplan

Butlin's Caravan Village Skegness - Proposed Layout Plan



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- SITE AREA - 73.00 ac res (29.5283 hectares)
- ▨ ECOLOGY AREA - 17.50 ac res
- ▨ Proposed LANDSCAPE + ECOLOGY AREA'S - 15.25 ac res

- Legend**
- Site Ownership Boundary
 - Site Boundary
 - ▨ Electric Cable & Easement
 - ▨ Underground Pipes & Easement
 - 378 No. Caravans (14' x 44')
 - Proposed Bins



A	Minor amendment - Caravan parking bays	NK	12.12.2023
Rev.	Details	Name	Date

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Client: **Butlin's Skyline Limited**
 Site Address: **Butlin's Caravan Village Skegness**
 Ingoldmells, Skegness PE25 1NJ
 Project: **Proposed Development of Adjoining Land**
 Drawing Title: **Proposed Layout Plan**

Date:	Scale:	Drawn:
Dec 2023	1:2000@A1	NK
Computer File Name:	Checked By:	
4848-271 - SKEGNESS ADJOINING LAND - LAYOUT PLAN - SK7 DWG		
Site Use:	Sketch Scheme SEVEN	
Drawing Number:	Revision:	
4848-271	A	