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Planning Department
South Holland District Council
Priory Road
Spalding
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Your ref:
Our ref: 5248993v1

11 July 2019

Dear Sir / Madam

FULL PLANNING APPLICATION FOR A CHANGE OF USE FROM A GARDEN CENTRE (USE CLASS A1) TO MIXED B1 AND B8 USES AND ASSOCIATED BUILDING OPERATIONS, AT THE FORMER WYEVALE GARDEN CENTRE, POSTLAND ROAD, CROWLAD, PE6 0JB.

Please find enclosed a full planning application for the above proposed development. The purpose of this covering letter is to describe the site, set out a detailed description of the proposed development and an assessment against key planning policy and material considerations.

Please note that in addition to this covering letter, this application is accompanied by the following supporting documentation:

- Application forms and certificates
- Location Plan (drawing no 100)
- Existing and proposed site plans (drawing nos 101 and 201)
- Existing and proposed ground floor plans (drawing nos 102 and 202)
- Existing and proposed elevations (drawing nos 110 and 210)
- Existing and proposed sections (drawing nos 111 and 211)
- Transport Statement
- Topographical Survey (to support the flood risk assessment within this covering letter)

Background and Economic Justification

Wyevale garden centre have decided to cease trading at the site due to a scaling back of their operations, as such they vacated the site in May of this year. The market shows limited demand for a replacement garden centre. The applicant and owner are keen to ensure that the site does not remain vacant and instead wish to find an appropriate new alternative uses to occupy the site, which will provide local employment and which will also respond to a demand for new employment space within the locality.

The Site

The application ‘site’ is denoted by the red line of the accompanying site location plan and comprises a large 5,282sqm (GIA) building which was formerly the Wyevale Garden Centre, along with goods yards to the

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north, south and west of the building and car parking areas to the east and south , providing approximately 99 spaces. Access is taken via a drive from Postland Road. In total, the site area extends to 2.28ha.

Context

The site is previously developed (brownfield) land. It is located on the north eastern end of Crowland, off Postland Road, there is a caravan park located approximately 50m to the north east. Postland Road joins to James Road, running close to the southern boundary of the site and this links to the A16, providing convenient highways links to wider locations including Peterborough to the south and Spalding to the north. The built up area of Crowland is located to the west of the site, albeit there is a separation distance of approximately 130m from the nearest residential areas. Further to the north, east and south of the site boundary lies open countryside, although mature vegetation surrounds the site boundaries and as such there is limited intervisibility between the site and views from the countryside beyond.

Environmental Designations

The Environment Agency's flood maps indicate that the site in its entirety falls within a flood zone 3, with a high probability of sea or river flooding (this is defined as 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). Flood risk and drainage is discussed in the assessment section below.

There are no designated heritage assets on the site or within close proximity and there are no other relevant environmental designations affecting the site.

Planning Policy Designations

The proposals maps of the adopted South East Lincolnshire Local Plan (March 2019) indicate that the site is located just outside of the settlement boundary, located west of the access point. It lies within a mineral safeguarding area for sand and gravel and also there is a housing allocation (Cro050) located approximately 140m to the west of the site.

Planning History and Lawful Use

Planning permission was granted for the change of use of the former Welland Holiday Hire business to a garden centre and use of 2 buildings for B1 (business) purposes on 10th July 2001 under planning application reference H02-0218-01. This established the lawful use of the site as a garden centre. The two buildings granted for B1 use are located within the adjacent Crowland Caravans and Camping site and are therefore outside of the subject application site and are not relevant to this application.

There are no other relevant planning applications covering the site as registered on South Holland District Council's online planning application search facility.

Proposed Development

The description of the proposed development is as follows:

'Change of use from garden centre (A1 use class) to mixed B1 and B8 uses and associated building operations, car parking and infrastructure.'

More specifically, the proposed development involves the following:

- The demolition of certain sections of the building and external compounds (indicated on the existing and proposed site plans).
- A change of use of the building to mixed B1 and B8 uses. The proposed site plan indicates how it is proposed to partition the internal spaces of the building into 8 individual units. However, we would

emphasise that the number of individual units, there size and precise internal arrangements have not been confirmed at this stage, as discussed more fully below

- Alterations to the exterior of the building, including new high doors, glazing sections and escape doors (these are indicated on the proposed plans and elevations).
- Alterations to the external goods yards and parking areas, to provide loading spaces for deliveries, car parking (a total of 166 spaces, which includes 6 electric charging bays and 10 disabled parking bays), cycle storage areas (for a total of 60 bicycles) a new site road layout with pedestrian paths and crossing points.
- External bin storage areas.

At this point in time, there are currently no identified specific occupiers or pre-lets to the building. As such, the exact internal layout (in terms of the number and size of individual units and positioning of internal partitions) cannot yet be confirmed as these will need to be tailored to the specific needs of occupiers. This planning application confirms the exact quantum of proposed floorspace in B1 and B8 uses; however, we would suggest that the exact internal layout is confirmed and approved by way of a 'prior to first occupation' planning condition, requiring the submission and approval of floor plans. We would like to seek the Local Planning Authority's agreement to this approach as it best enable the site to respond to market demand, increasing the likelihood of the building being brought back into use.

Planning Policy Context and Assessment

The statutory development plan comprises the South East Lincolnshire Local Plan (2011-2031), which was adopted in March 2019. Planning law dictates that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise.

The key policies of the Local Plan which are of relevance to the proposed development are as follows:

Policy 1 (Spatial Strategy)

Policy 2 (Development Management)

Policy 3 (Design of New Development)

Policy 4 (Approach to Flood Risk)

Policy 7 (Improving South East Lincolnshire's Employment Land Portfolio)

Policy 30 (Pollution)

Policy 33 (Delivering a More Sustainable Transport Network)

Policy 36 (Vehicle and Cycle Parking)

Principle of Development.

The application site is located outside of, but adjacent to the settlement boundary of Crowland, which is a 'main service centre' in the Local Plan (considered to be a sustainable settlement, second only to 'sub-regional centres' within the settlement hierarchy under policy 1). Given that the site is located outside of the settlement boundary, it is therefore designated under policy 1 as being in the 'countryside' for planning purposes. The policy states that 'in the Countryside development will be permitted that is necessary to such a location and/or where it can be demonstrated that it meets the sustainable development needs of the area in terms of economic, community or environmental benefits'.

However, policy 7 of the Local Plan contends directly with achieving sustainable development in economic terms and improving South East Lincolnshire's Employment Land Portfolio. The site is not a designated 'main employment area', 'Local Employment Area', 'Restricted Use Employment Site' or 'Established

Employment Site' within the policy, however it does constitute an 'other employment site' under the policy. For 'other employment sites' the policy supports the principle of new employment development provided that the proposal involves the re-use of previously-developed land or the conversion/re-use of redundant buildings. The site does comprise 'previously-developed land' under the definition in the National Planning Policy Framework (NPPF, 2019); furthermore, the proposed development does also involve the conversion and re-use of the existing building on site to provide new B1 and B8 employment uses. As such, the principle of the proposed development is supported by the development plan.

The NPPF (2019) is also an important material consideration for the purpose of determining this planning application. Chapter 6 states that 'planning policies and decisions should help to create the conditions in which businesses can invest, expand and develop'. The NPPF supports developments which meet the changing needs of businesses and generate investment and growth. The proposed development will result in the sustainable reuse of a vacant site to accommodate new employment uses and this is a benefit which weighs heavily in support of the scheme in the planning balance.

Design

The proposed development does not involve any significant changes to the external appearance of the existing building, other than the provision of new doors and glazing to serve the units. The building comprises a relatively large steel frame structure, with brick and steel clad walls, and has the utilitarian appearance of a typical warehouse. The proposed development will therefore result in no material design changes. The proposed development also meets the additional criteria within policy 3 of the Local Plan and the provision of footpaths, dropped kerbs and level accesses and cycle and car parking will enable accessibility by a choice of travel modes and for all users, the required infrastructure and bin storage to serve the proposed development is provided and a lighting scheme will be provided for safety and crime prevention. The proposed development is therefore in accordance with policy 3.

Pollution and Neighbouring Amenity

Policy 2 (Development Management) and also policy 30 (Pollution) of the Local Plan seek to ensure that development proposals are acceptable in terms of impacts upon neighbouring land uses by reason of noise, odour, disturbance and visual intrusion. Policy 30 further states that development proposals should be acceptable upon the surrounding environment and the public, taking into account of any proposed mitigation measures, in terms of air quality, noise and vibration, light levels, land quality and condition and surface and groundwater quality.

The proposed uses do have some potential to result in noise impacts, but are very much in keeping with the existing lawful use of the site as a Garden Centre.The range of proposed uses has been deliberately restricted to B1 and B8 uses as opposed to B2 (industrial uses) and as such, potential impacts in terms of noise, vibration or odour are considered to be limited. Furthermore, the former use of the site as a garden centre involved regular deliveries and unloading and loading of stock at the site and therefore, introducing new B1 and B8 uses should not result in any additional or unacceptable impacts in these regards. Furthermore, the site is separated from the nearest land uses by some distance, which will reduce any potential for disturbance. The nearest residences on Girdlestone Walk are separated by a field at a distance of approximately 80m. The Crowland Caravans and Camping sales business is not considered to be sensitive to noise impacts, but nevertheless this is separated from the site by approximately 40m at its closest point.

The proposed development will involve a scheme of external lighting for safety and to enable operation of the employment uses in the winter months when daylight hours are short. However, the external lighting arrangements will be equivalent to the former garden centre use and will therefore not result in any unacceptable impacts in terms of light pollution or disturbance upon neighbouring land uses.

The proposed development involves a simple change of use of the site to a non-sensitive end use in terms of land contamination (B1 and B8 uses) and as such, the proposed development is considered to be acceptable in these regards. For this reason it is also in accordance with policy 30 of the Local Plan.

Transport and Parking

Policy 33 of the Local Plan states that major proposed developments which will result in impacts upon the local highway network should be accompanied by a Transport Statement, setting out the transport impacts of the proposed development and how opportunities for more sustainable transport have been taken up. This planning application is supported by a Transport Statement explaining the impacts upon the highway, how the site access meets the relevant standards and how sustainable transport modes have been encouraged.

The proposed development incorporates a total of 166 car parking spaces, which includes 10 disabled spaces and 6 electrical car charging spaces. A total of 60 cycle spaces are provided for. The arrangements are in accordance with policy 36 of the Local Plan and the minimum standards.

Flood Risk Assessment and Drainage

Vulnerability to Flooding

The site is located in an area protected by flood defence embankments from flooding associated with the River Welland. Both the existing retail use and the proposed commercial/light industrial use are classed by the NPPF as *less vulnerable*. These uses are appropriate in all Flood Zones.

Topography

The floor level of existing garden centre building is approximately +1.4m AOD. External levels, including outdoor sales and storage areas, access road and car park, vary between +1.1m AOD and +1.3m AOD. These levels will remain unchanged by the proposals. Without defences, such low levels in this area would be susceptible to flooding.

Flood History

There have been no flood events recorded at the site since March 1947.

Potential for Fluvial Flooding

The EA *Flood Risk from Rivers or the Sea* map shows the site to be entirely located in an area of *very low* flood risk. This status, which acknowledges the presence of the defences, is the equivalent of Flood Zone 1 (Low Probability) on the EA *Flood Map for Planning*, which, by ignoring the defences, shows the site to be located in Flood Zone 3 (High Probability).

The South Holland Strategic Flood Risk Assessment 2016 Update provides maps based on modelling a theoretical series of breaches in the defence embankments. The map generally referred to is the *Residual Peak Depth Crowland 2115 1% Fluvial/0.5% Tidal Event Probability* map which not only forecasts the consequences of a defences breach but also the effect of climate change over the next 100 years. This map shows potential flood depths in the range 1.0m - 2.0m across the site for this conjectured event.

Potential for Surface Water Flooding

The EA *Flood Risk from Surface Water* map shows no significant risk of surface water flooding at the site.

Potential for Reservoir Flooding

The EA *Flood Risk from Reservoirs* map shows a risk of reservoir flooding, albeit very low, similar to that for 1 in 100 year fluvial flooding at the site.

Potential for Flooding from Other Sources

Flood risk from other sources such as groundwater or sewers is considered to be very low.

Flood Risk Assessment

Fluvial Flooding

As the flood risk from surface water, reservoirs and other sources is very low, the only matter of concern is fluvial flood risk from the River Welland which would only occur if the defences were breached. Although this has not happened during the past 72 years, making the risk low, it remains a theoretical possibility which will be addressed by the adoption of a robust flood management plan to create a safe working environment.

Flood Management Plan

Change of Use Benefit

The proposed commercial/industrial use with established employees and limited visitors will lend itself to a greater measure of control and consequently more reliable flood management planning than is possible with the current retail use involving uncontrolled public access.

Flood Warnings and Evacuation

The occupants of the building will register for the EA's *Floodline Warnings Direct* service which is available for the site. Should a flood warning be received or a flood event be otherwise predicted, personnel will evacuate in good time before any local flooding occurs to dry ground either at Crowland town centre, about 1 km to the south-west, or preferably at Peterborough, about 10 km to the south.

NPPF Sequential and Exception Tests

The Sequential Test is not required for changes of use. The Exception Test is not required for *less vulnerable* uses.

Drainage

The site will continue to drain to the surrounding land drainage system as it does at present. The proposed development does not involve introducing new impermeable surfaces and there are no anticipated changes to surface water impacts than exist at present.

In terms of foul drainage, the proposed development will connect to the existing infrastructure, in the same manner as the existing garden centre and the infrastructure should be capable of accommodating flows given that the foul water impacts are expected to be less than the former garden centre use.

Conclusion

While the risk of a flood occurring at the site will not be affected by the proposed change of use, any hazard to personnel will be reduced by the adoption of a reliable flood management plan. The proposed change of use may therefore be implemented without any concern with respect to flooding and without increasing flood risk elsewhere. The proposed development is therefore accordance with policy 4 of the Local Plan.

Conclusion

This covering letter has provided a detailed description of the site and the proposed development, along with an assessment against the development plan and material planning considerations. The principle of development is supported by the development plan and the proposed development is acceptable in terms of its impacts.

The proposed development will bring numerous benefits, including the sustainable re-use of a derelict brownfield site and providing a number of new employment units on the site should result in a net gain in employment over and above the former garden centre use.

We therefore respectfully request for the planning application to be supported and for a determination to be issued as soon as possible.

Yours faithfully

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