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South Holland District Council
Council Offices
Priory Road
Spalding
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United Kingdom
PE11 2XE

11 October 2022

Our Ref: 22/6469

Dear Lucy

H05-0565-22: Land at Lowgate, Fleet, Spalding

On behalf of the applicant, Larkfleet Group, we are writing to provide additional clarity regarding the economic reasons for pursuing an application seeking an uplift in the number of holiday lodges at the above site beyond the 24 lodges consented under planning application H05-0773-17 on 10th July 2018 and subsequent associated Non-Material Amendments.

Further to recent discussions, we understand that the proposals are supported by your Planning Officers; however, the application has been 'called in' to Planning Committee following the recent Chair's Review Panel on 30th September 2022. Several matters have been raised in respect of the proposals. This letter seeks to provide important clarifications to the Council accordingly.

The proposed increase in the number of holiday lodges is designed to provide an extended tourist and recreation offer, which aligns with the general principles of Policy 1 and Policy 9 of the South East Lincolnshire Local Plan. Our client has received advice from Hoseasons, an experienced national holiday accommodation letting platform, who advised that the attractiveness of the destination would be enhanced through the provision of a greater critical mass of accommodation.

It should be noted that the approved 24-unit layout provides for a general arrangement of lodges that is replicated with the 38-unit proposal. The pattern and distribution of lodges follows a regular pattern around the lakes. The layout is efficient and orderly. It is very typical for sites like this to be arranged in such ways, to ensure efficient access arrangements, minimise hardstanding, and ensure that each unit benefits from an unincumbered outlook across the undeveloped lake areas rather than other lodges. The approved 24-unit layout allows for gentle densification within underutilised areas of the site. The proximity of lodges within the uplift proposal is not materially different to that previously approved, and is supported by a comprehensive Landscape Visual Impact Assessment which has been considered by Officers.

Critically, the additional 14 lodges proposed allows the applicant to viably deliver the scheme and secure the range of planning benefits on offer. While the extant permission for 24 lodges is currently being delivered, the consistency of layouts would effectively enable the applicant to move from one permission to another to deliver the additional units. The applicant has

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previously outlined the commercial importance of commencing development at the earliest opportunity to facilitate a return on the investment when the units are occupiable from 2023.

While the applicant has taken a commercial view on implementing the extant consent to stimulate cashflow, it should be recognised that several site-specific matters have contributed to escalating costs over and above the highly challenging wider economic climate affecting the construction industry, principally:

- A £500,000 investment in sustainable low-carbon technologies to service the site including solar panels and EV charging for each unit, as well as the creation of an on-site micro-grid to service the development.
- Investment in wind fence technologies, consent for which will be sought under a stand-alone application, to be formally submitted to SHDC imminently.
- Installation of a foul drainage connection to provide a more sustainable solution than the use of septic tanks that was originally proposed under the 24-lodge scheme.
- Significant landscaping improvements to support boundary screening, in turn increasing biodiversity. The boundary landscaping includes new banking to reduce noise from the A17 into the site, and improve the privacy afforded to adjacent neighbours to the site, as well as occupiers of the lodges themselves.

The primary objective for the applicant is for a more robust, sustainable and consolidated development, which is better equipped to meet market expectations and ensure financial viability. In addition, the applicant has employed a local lodge manufacturer to procure the lodges. The manufacturer – based in Lesko Peterborough - is experiencing significant financial challenges which the forward order of lodges for the site has largely addressed, ensuring a vital contribution to the local economy.

For completeness, and in response to other matters raised:

- It is categorically not the intention for the development to be used as a permanent residential site. This matter will be protected against by a planning condition attached to the extant permission which expressly ensures the site's use for holiday homes.
- The appearance and materials of the lodges is consistent with those previously approved under the extant permission, which establishes a design precedent to be replicated with the uplift scheme.
- The developer would sell a portion of the lodges to individuals to be used as holiday homes; while the balance would be let via Hoseasons as an experienced intermediary.
- As noted above, the energy strategy has been designed at significant cost. Foul sewage will be dealt with via a mains connection. The provision of details for both the energy strategy for photo-voltaic cells, and the foul water drainage, are to be reserved by planning condition.
- The condition requested by the EA is entirely uncommercial and unreasonable to impose. Officers agree that occupations should not be restricted for winter months as it fundamentally changes the business model, and would make the development unviable.

In summary, the applicant has worked collaboratively with Officers over several months to devise a scheme that contributes strongly to the Council's objectives to stimulate inward investment into the rural economy and simultaneously support the

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tourist economy. The uplift proposals are designed to ensure the long-term viability of the investment amidst a challenging economic climate, and deliver a critical mass of new lodge development to secure its success.

We trust that this letter provides important clarifications that enables the Council to support the proposal and grant planning approval.

Yours sincerely,

Planning Potential
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Enc.

Larkfleet Group (Applicant)

Athene Communications (Communications Consultant)

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