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CL-2202 – Holbeach AWR Target Replacement PLANNING STATEMENT

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DOCUMENT STATUS

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1.0 Introduction

- 1.0.1 This planning statement is in support of a full application for the proposed target 6N replacement at Holbeach Air Weapons Range.
- 1.0.2 RAF Holbeach is a remote firing range situated on The Wash, around 8 miles North-North-East of Holbeach village, Lincolnshire. The range facilitates ordnance training for RAF and NATO – allied air craft. The existing 6N Target comprises of 2 coal barges, each approximately 30 metres in length. Through age, corrosion and use 6N target is no longer serviceable and requires replacement to ensure the range remains at full operational capability.
- 1.0.3 The planning application is accompanied by the following documents:
- Planning Application Form
 - Planning Statement (this Document)
 - Plans and Elevation Drawings
 - Ecological Impact Assessment
 - Shadow Habitat Regulation Assessment
 - Flood Risk Assessment
 - Water Framework Directive Assessment

2.0 Site and Surroundings

- 2.0.1 The location of this project set in The Wash within the Holbeach Air Weapons Range (grid reference: TF 47422 32199), which is situated within the Anglian River Basin.
- 2.0.2 The site is a wide open mud flat with several sunken barges situated as Targets for AWR purposes. The nature of the AWR means the site is very remote and has no neighbouring buildings or dwellings. The closest non AWR building to the proposed development is Worth Ah Browns Farm which is 2.4 km WSW of the proposed site.
- 2.0.3 The Wash is protected by multiple statutory designations, The Wash Ramsar Site, The Wash Site of Special Scientific Interest, The Wash & North Norfolk Coast Special Area of Conservation, The Wash Special Protection Area and the South East Wash Shellfish Waters 2014. The site is also situated 3.3KM NW of The Wash National Nature Reserve.
- 2.0.4 Consulting the Multi Agency Geographic Information for the country side (MAGIC) shows that the proposed target site is situated outside of any heritage site and is not adjacent to any listed buildings. The closest building of historical importance is a grade 2 listed building situated 2.8km WSW from the proposed target site.
- 2.0.5 The aerial photo on the following page shows the site and its surroundings.



Figure 1 Aerial photo of Holbeach AWR from Google Maps. Three red circles highlight different aspects of the Air Weapons Range, Top Left shows the main Holbeach AWR offices. Bottom Centre is the Air Traffic Control Tower. Top right is the Target 6N Location for the proposed new target.

3.0 The Proposal

- 3.0.1 The proposal is to locate two new barges along side the existing Target 6N at the Holbeach Air Weapons range. The two new barges will be 30m in length, 6m in width and 5m in height . They will replicate a barge convoy in tow for target practice purposes.
- 3.0.2 The barges will be towed to site separately, and the installation process will be repeated for each barge individually. The barges will be towed from a near by port, likely Boston or Kings Lynn. On a rising Spring tide local shallow draft tugs will tow the barges to site and connect to ground moorings. The barge will be held in position while the tide drops and it takes the ground. Once on the sea bed, flooding ports will be opened to allow the barge to flood on the next tide. The barge will be monitored during the next flooding tide for movement and once satisfied the barges are remaining in position, the tugs will depart and repeat the process for the second tug.

4.0 Design and Access Elements

- 4.0.1 The details of the proposed target barges have been provided in the submitted drawings and other supporting reports accompanying the application. However, for the purpose of clarification and completeness, the elements of the application proposal are set out below:
- 4.0.2 Use
As referred to in the description of the proposal, the installation of the replacement target barges allows for the continued full operation of the Holbeach AWR.

Figure 5 Aerial photo of the Thames Estuary and Leigh Sands, a photo looking to the South from the 3rd Chalkwell Bay Sea Scout Group Compound.

- Amount and Scale
- 4.0.3 The proposed target barges are 30 meters in length and 6 meters in width and 5 meters in height for a combined length of 60m, leading to a site area of 360m².
- Layout
- 4.0.4 As shown in the submitted site plan, the proposed target barges will occupy part of the sea bed alongside the existing barges. The convoy arrangement is oriented North East to South West to ensure the sea state runs on to the narrow ends of the barges.
- Landscaping
- 4.0.5 This element is not relevant to the application proposal. Given its nature and purpose, the proposed scheme would not result in the loss of any important vegetation or landscaping features or require any landscaping provision.
- Appearance
- 4.0.6 The proposed target barges are steel hopper barges being purpose constructed to form the new targets. They are of steel construction, 30 meters long, 6 meters wide and 5 meters high. The barges are in keeping with the marine aesthetics of the AWR. They will be painted to be identified as targets within the AWR.
- Access
- 4.0.7 The proposed target barges are not accessible and do not need to be accessed for normal operation. They are designed not to need access during normal use and do not require maintenance.

5.0 Relevant Planning Policies and Detailed Considerations

- 5.0.1 Under S.38 of the Planning and Compulsory Purchase Act 2004, decisions on planning applications must be made in accordance with the development plan unless other material considerations indicate otherwise.
- 5.0.2 The application has been considered principally against the relevant legislation including the National Planning Policy Framework (NPPF) (2021) and the South East Lincolnshire Local Plan (2019).
- 5.0.3 The NPPF introduced a presumption in favour of sustainable development and all Council plans will need to be updated to reflect this. For decision-taking, the approach by the NPPF means development proposals that accord with the development plan should be approved without delay.
- 5.0.4 The proposed plan has full regard to achieving sustainable development considering each objective as follows:

- Economic Objective
- 5.0.5 The installation of the target barges at Holbeach AWR will result in the continued full operation of the facility for the training of British and Nato Jet Pilots. The proposed development will have no negative impact on the governments vision to promote a strong, stable and productive economy which aims to bring jobs and prosperity for all. The installation works will result in local marine companies being employed for the installation works

Environmental Objective

- 5.0.6 The proposed scheme would not result in an unacceptable impact of loss to any important natural, built, or historic environment – this has been demonstrated in the submitted accompanying reports addressing all relevant environmental considerations.
- 5.0.7 Paragraph 81 of the NPPF states that planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing. The application proposal creates an opportunity to enhance a facility that contributes to the community and encourages the use of the Thames and services the marine industry within the area.
- 5.0.8 The NPPF states that “*Good design is a key aspect of sustainable development, creates better places [...]*” (paragraph 126). Design policies should ensure that proposals “*create places that are safe, inclusive and accessible [...], with a high standard of amenity for existing and future users.*” (paragraph 130).
- 5.0.9 Whilst the installation of the two new target barges is not major in scale, it still has regard to these principles by using suitable materials that are in keeping with the general appearance of the local context.
- 5.0.10 The replacement targets will reflect their setting and will positively contribute towards the enhancement of the use of the site.
- 5.0.11 The South East Lincolnshire Local Plan echoes the sustainable development sentiment of the NPPF.
- 5.0.12 The Strategic Priorities detailed in the Local Plan are as follows:
- 5.0.13 SP1 – To deliver sustainable development in South East Lincolnshire that seeks to meet the social and economic needs of the area, whilst protecting and enhancing its environment for the enjoyment of future generations.
- 5.0.14 SP2 – To ensure that the scale, distribution and type of new development is sustainably located to take account of flood risk across South East Lincolnshire.
- 5.0.15 SP3 – To ensure that development contributes to the provision of necessary physical, social and green infrastructure to deliver planned levels of growth at the right time and to mitigate its impacts on existing communities and the environment.
- 5.0.16 SP4 – To provide the right conditions and sufficient land in appropriate locations to help diversify and strengthen the economic base of South East Lincolnshire to meet the needs of existing businesses, to attract new businesses and sources of employment, and to maximise the potential historic and environmental assets can have for sustainable tourism.

- 5.0.17 SP5 – To protect a mutually-supportive hierarchy of vibrant self-contained town centres and secure their enhancement by promoting an appropriate mix and scale of retail, leisure and other town centre uses and by maximising opportunities for regeneration.
- 5.0.18 SP6 – To provide enough choice of land for housing to ensure that the housing stock better meets local housing needs and aspirations, including for older people, first time buyers and those in need of affordable and starter housing.
- 5.0.19 SP7 – To conserve and enhance South East Lincolnshire’s natural and historic environment and to promote greater access and understanding of assets through new development.
- 5.0.20 SP8 – To minimise the impact of and adapt to climate change by making more sustainable use of land and resources, reducing exposure to flood risk, promoting sustainable development and reducing human exposure to environmental risks.
- 5.0.21 SP9 – To promote the more efficient use of land, prioritise the re-use of previously developed land and to minimise the loss of South East Lincolnshire’s high quality agricultural land by developing in sustainable locations, at appropriate densities.
- 5.0.22 SP10 – To provide equal opportunities for everyone who lives, visits, works and invests in South East Lincolnshire by helping to create more sustainable communities, reduce locational disadvantage and upgrade a range of community facilities recognising that these all contribute to the fulfilment, health and well-being of residents and visitors alike.
- 5.0.23 SP11 – To improve accessibility for all to jobs, services and facilities by sustainable and public transport, to make travel as easy and affordable as possible, both within the area and along key links to and from South East Lincolnshire.
- 5.0.24 SP12 – To improve Southeast Lincolnshire’s highway infrastructure, to tackle congestion, improve road safety and make journeys as easy as possible particularly for those living in rural areas and to enhance efficiencies for business.
- 5.0.25 The strategic priorities allowed the local plan to set policies in which planning departments can assess applications against standardised rules to ensure these strategic priorities are being met.
- 5.0.26 Through this planning statement and the accompanying supporting documents, we will demonstrate how the proposed replacement target barges at Holbeach AWR will either support or have no bearing on the policies set out in the South East Lincolnshire Local Plan.

5.1 Spatial Strategy

- 5.1.1 The Spatial Strategy detailed within the local plan is defined considering a number of factors including the presence of available and deliverable sites, infrastructure capacity and needs, proximity to local shops, services and community facilities, access to public transport and in particular, flood risk.

5.1.2 The proposed installation of the replacement target barges at Holbeach AWR will have no bearing on the Spatial Strategy policy of the South East Lincolnshire Local Plan. The barges are situated on the seabed within The Wash. They will have no impact on any of the factors which are considered within the spatial strategy.

5.1.6 In light of the above, the proposed target barges will have no bearing on the local councils goals for spatial strategy and will not impact policy 1 of the local plan.

5.2 Development Management

5.2.1 As taken from paragraph 3.3.1 of the South East Lincolnshire Local Plan, Policy 2 provides a framework for an operational policy to be used in assessing the sustainable development attributes of all development proposals. In essence, it is a compendium of the sustainable development considerations contained in other policies in the Local Plan and is provided as an overarching 'summary' policy to help decision makers, and applicants alike, focus on the type of factors that will be assessed in considering development proposals. All types of planning applications requiring a decision will be subject to the considerations of this policy.

5.2.2 The proposed replacement target barges will consider the categories detailing within policy 2. The replacement targets will have no bearing on the following categories listed in policy 2:

- Size, scale, layout, density and impact on the amenity, trees, character, and appearance of the area and the relationship to existing development and land uses;
- Quality of design and orientation;
- Access and vehicle generation levels;
- The capacity of existing community services and infrastructure;
- Impact upon neighbouring land uses by reason of noise, odour, disturbance or visual intrusion;
- Impact on the potential loss of sand and gravel mineral resources.

5.2.3 The replacement targets will, where possible, make use of sustainable materials and resources. However, there is a set criteria which needs to be adhered too in order for the targets to meet their required design, and given that they are steel construction and have no other duty but to act as targets, there is limited potential for sustainable materials to be utilised.

5.2.4 The barges once situated in place will have no material impact on flood risk as they will allow water to freely flow in and out of their compartments. With this there is no storage capacity loss, and there is no impact on the drainage aspect as the barges are not affected by drainage.

5.2.5 The impacts to the enhancement of natural habitats have been discussed in the accompanying Ecological Impact Assessment and the Shadow Habitat Regulation Assessment. There will be no impact to any historical or heritage assets as the site is not within or near any heritage site.

5.2.6 The site is not open for sand or gravel mineral resources and the proposed targets will have no bearing on this category from policy 2.

5.3 Design of New Development

- 5.3.1 Policy 3 of the South East Lincolnshire Local Plan details good design as a key aspect of sustainable development. It identifies issues that should be considered when preparing schemes and planning statements so that development sits comfortably with, and adds positively to, its historically-designated or undesignated townscape or landscape surroundings.
- 5.3.2 Again due to the projects niche setting, it is often not applicable when considering the highlighted categories. The replacement targets will have no bearing on any of the categories detailed within policy 3 as it is widely related to the construction of premises on the land. The installation of the replacement targets being situated within the wash on the land designated for MOD use greatly limits the opportunity for material impacts or applicability of the categories detailed.
- 5.3.3 Through the details provided in this planning statement and the supporting documents accompanying the planning application it is demonstrated that installation of the replacement targets will have no bearing on policy 3 of the Local Plan.

5.5 Approach to Flood Risk

- 5.5.1 The proposed installation of the replacement targets is a niche case when considering flood risk. The activity can be considered a compatible activity for a water based location and an exception test is not needed as the development is considered to be appropriate as it is located in Flood Zone 3b and is classified as a water compatible development.
- 5.5.2 The barges will be acting as static structures, that are intended to flood on every tide, that will not have any persons occupying them at any time. They are situated within Flood Zone 3B but they are water compatible and require flooding to operate correctly. They are designed to be resilient to flooding as that is the purpose of their situation. They will not increase flood risk elsewhere as they allow water to freely flow into and out of their compartments. There will be no persons on board during times of flooding or at any point and evacuation will not be required. Any water which falls on the barges will drain through the structure and drain out of the flooding ports.
- 5.5.3 Due to the structures task, construction and situation it is considered that the installation of the replacement targets will have no material impact on Flood Risk.

5.6 Meeting Physical Infrastructure Service Needs

- 5.6.1 The replacement targets at Holbeach AWR will have no bearing on Policy 5: Meeting Physical Infrastructure and Service Needs. There is no change to the requirement for physical infrastructure and service needs as a result of the installation of the replacement targets.

5.7 Developer Contributions

- 5.7.1 The installation of the target barges are not for any dwellings and therefore have no bearing on policy 6: Developer Contributions.

5.8 Improving South East Lincolnshire's Employment Land Portfolio

- 5.8.1 The installation of the proposed replacement target barges will have no bearing on the creation of further jobs, but will continue to support the Holbeach AWR site and contribute to the employment of people in the local area.

5.9 Prestige Employment Sites

- 5.9.1 The installation of the proposed replacement target barges will have no bearing on the creation of further jobs, but will continue to support the Holbeach AWR site and contribute to the employment of people in the local area. The installation site is situated within the Wash on land designated for MOD use.

5.10 Promoting a Stronger Visitor Economy

- 5.10.1 Whilst not directly adjacent to the sea wall the visitor economy it is well known that people come to watch the range activities as the path is public access. By replacing the dilapidated targets with new targets, it ensures the range operation remains at full capacity and will allow people to continue observing range activities.

5.11 Meeting Assessed Housing Requirements

- 5.11.1 The installation of the proposed replacement target barges will have no bearing on policy 10: Meeting Assessed Housing Requirements.

5.12 Distribution of New Housing

- 5.12.1 The installation of the proposed replacement target barges will have no bearing on policy 11: Distribution of New Housing.

5.13 Reserve Sites

- 5.13.1 The installation of the proposed replacement target barges will have no bearing on policy 12: Reserve Sites.

5.14 South West Quadrant (Sou006) Sustainable Urban Extension

- 5.14.1 The installation of the proposed replacement target barges will have no bearing on policy 13: South West Quadrant (Sou006) Sustainable Urban Extension.

5.15 South of North Forty Foot Drain (Wes002) Sustainable Urban Extension

- 5.15.1 The installation of the proposed replacement target barges will have no bearing on policy 14: South of North Forty Foot Drain (Wes002) Sustainable Urban Extension.

5.16 Vernatts Sustainable Urban Extension

- 5.16.1 The installation of the proposed replacement target barges will have no bearing on policy 15: Vernatts Sustainable Urban Extension.

5.17 Holbeach West Sustainable Urban Extension

- 5.17.1 The installation of the proposed replacement target barges will have no bearing on policy 16: Holbeach West Sustainable Urban Extension.

5.18 Providing a Mix of Housing

- 5.18.1 The installation of the proposed replacement target barges will have no bearing on policy 17: Providing a Mix of Housing.

5.19 Affordable Housing

- 5.19.1 The installation of the proposed replacement target barges will have no bearing on policy 18: Affordable Housing.

5.20 Rural Exception Sites

- 5.20.1 The installation of the proposed replacement target barges will have no bearing on policy 19: Rural Exception Sites.

5.21 Accommodation for Gypsies, Travellers and Travelling Showpeople

- 5.21.1 The installation of the proposed replacement target barges will have no bearing on policy 20: Accommodation for Gypsies, Travellers and Travelling Showpeople.

5.22 Houses in Multiple Occupation and the Sub-Division of Dwellings

- 5.22.1 The installation of the proposed replacement target barges will have no bearing on policy 21: Houses in Multiple Occupation and the Sub-Division of Dwellings.

5.23 Replacement Dwellings in the Countryside

- 5.23.1 The installation of the proposed replacement target barges will have no bearing on policy 22: Replacement Dwellings in the Countryside.

5.24 The Reuse of Buildings in the Countryside for Residential Use

- 5.24.1 The installation of the proposed replacement target barges will have no bearing on policy 23: The Reuse of Buildings in the Countryside for Residential Use.

5.25 The Retail Hierarchy

- 5.25.1 The installation of the proposed replacement target barges will have no bearing on policy 24: The Retail Hierarchy.

5.26 Supporting the Vitality and Viability of Boston and Spalding Town Centres

- 5.26.1 The installation of the proposed replacement target barges will have no bearing on policy 25: Supporting the Vitality and Viability of Boston and Spalding Town Centres.

5.27 Primary Shopping Frontages

- 5.27.1 The installation of the proposed replacement target barges will have no bearing on policy 26: Primary Shopping Frontages.

5.28 Additional Retail Provision

- 5.28.1 The installation of the proposed replacement target barges will have no bearing on policy 27: Additional Retail Provision.

5.29 The Natural Environment

- 5.29.1 The installation of the proposed replacement target barges at Holbeach AWR has the potential to impact upon the objectives of policy 28: The Natural Environment. To assess the impact from the proposed works, an ecological impact assessment was prepared, and a Shadow Habitats Regulation Assessment was prepared. These reports assessed impacts to the area because of installing the target barges. It was deemed that the impacts to any environmental receptor would be negligible. A water framework directive assessment has also been prepared which assesses the impacts to the marine environment. The WFD report also showed that there would be no material impact to the waterbody or River basin area because of the proposed works. These reports accompany the planning application.

5.30 The Historic Environment

- 5.30.1 The installation of the proposed replacement target barges will have no bearing on policy 29: The Historic Environment.

5.31 Pollution

- 5.31.1 The installation of the proposed replacement target barges will have no bearing on policy 30: Pollution. The works will have very limited opportunity for introduction of pollutions, limited to the installation which is anticipated to take 1 week of onsite time. The methods for installation are simple and low impact. The only potential introduction is from the small local tugs which will be well maintained and follow their safety management system. It is considered that there will be no material impact to any of the considerations within policy 30 of the Local Plan.

5.32 Climate Change and Renewable and Low Carbon Energy

- 5.32.1 The works will not result in any impacts on any of the considerations within Policy 31 of the Local Plan. The activity can be considered a compatible activity for a water based location and an exception test is not needed as the development is considered to be appropriate as it is located in Flood Zone 3b and is classified as a water compatible development.

5.33 Community, Health and Well-being

- 5.33.1 The installation of the proposed replacement target barges will have no bearing on policy 32: Community, Health and Well-being.

5.34 Delivering a More Sustainable Transport Network

- 5.34.1 The installation of the proposed replacement target barges will have no bearing on policy 33: Delivering a More Sustainable Transport Network.

5.35 Delivering the Boston Distributor Road

- 5.35.1 The installation of the proposed replacement target barges will have no bearing on policy 34: Delivering the Boston Distributor Road.

5.36 Delivering the Spalding Transport Strategy

- 5.36.1 The installation of the proposed replacement target barges will have no bearing on policy 35: Delivering the Spalding Transport Strategy.

5.37 Vehicle and Cycle Parking

- 5.37.1 The installation of the proposed replacement target barges will have no bearing on policy 36: Vehicle and Cycle Parking.

6.0 Conclusion

- 6.0.1 The proposed installation of the replacement target barges is a particularly niche activity and has little bearing on most of the policies, visions and objectives set out within the NPPF and the South East Lincolnshire Local Plan.
- 6.0.2 There is no obvious conflict with the relevant planning policies and the proposed replacement target barges are of appropriate design and layout that reflect the character and appearance of the locality without resulting in any adverse impacts in terms of any environmental or heritage considerations.
- 6.0.3 Appropriate consideration has been paid to the potential impacts to the Environment, Flood Risk, Pollution, climate change, Spatial Strategy, Development Management and Design of New Development. Through implementing any mitigations detailed in the supporting documents there will be no material impacts caused through the installation of the new replacement targets at Holbeach AWR.
- 6.0.4 This planning statement has established that the proposed installation of the new replacement targets at Holbeach Air Weapons Range complies with policies at a national and local level. We, therefore, respectfully request that the Council grant full planning consent for the proposed scheme.