

Graham Anthony Associates

Planning & Flood Risk Statement

Variation of Condition Application Ref: H11-0420-18



RTPI

Chartered Town Planners

CLIENT	Mr Hoey
PROJECT TITLE:	Variation of Condition
DOCUMENT REF:	GA3266

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1.0 Introduction

- 1.1 This Planning Statement has been prepared by GA Associates on behalf of Mr Hoey (the Applicant) to accompany a request for the removal of condition 11 to allow a 12-month holiday season at Land at Vicarage Lane, Long Sutton, Spalding.
- 1.2 GA Associates consider that all material planning considerations have been addressed within this document and all additional information required to determine the application has been provided within the accompanying drawings.
- 1.3 This planning application includes the following:
- Planning Application Forms and Notices;
 - Planning Statement;
 - Flood Risk Assessment; and
 - Planning Drawings.

2.0 The Site Location

- 2.1 The site gained a mixed-use leisure permission in December 2018 which included the siting of 30 static holiday caravans. The site is located to the north of Vicarage Lane, at the junction of the A17 and the A1101. The site is immediately south of the A17 and immediately west of McDonalds.
- 2.2 Access to the site is via an internal roadway off Vicarage Lane which is shared with McDonalds. The site is positioned within a commercial hub, with McDonalds to the immediate east, and the Long Sutton Barn Craft Village so the immediate south. Opposite McDonalds there is a former petrol filling station which is currently used for static caravan sales with a car sales business 'Compact Car Corner' next door. To the north of the site, on the opposite side of the A17 is a BP petrol filling station and Subway sandwich shop, Benny's Diner and a Travel Lodge.
- 2.3 The grade II Listed Building of Seagate Hall is located approximately 180m west of the site. The site lies within flood zone 3.

3.0 The Proposal

- 3.1 This application seeks removal of condition 11 attached to extant planning permission Ref: H11-0420-18) which in effect obligates a four month 'close season':

'No static Caravans on site shall be occupied between 1 November (or the following Sunday, if half term extends into November) in any one year and 14 March in the succeeding year'

Reason: To reduce the impact of flooding.

- 3.2 The nature of holidays in the UK has become increasingly diverse with people going away several times a year and not exclusively in the summer months. The spread of this demand over more of the year improves the use made of holiday accommodation and is advantageous to the businesses which provide accommodation and the host communities which are supported by the spending which it generates. Therefore, the closed season currently stipulated on the decision notice is considered unfit for purpose.

4.0 Principal Discussion

- 4.1 It is standard practice now that all caravans and lodges on modern leisure parks meet the higher BS 3632 (residential) specification, rather than the lower specification for 'holiday only' caravans. This higher standard is also required by the national letting agency through which bookings for commercial holiday lettings are managed. Therefore, it is evident that persons could occupy the units for holiday use between November 1st and March 14th without creating unacceptable living conditions.
- 4.2 The restricted occupancy condition as stipulated on the decision notice was imposed on flood risk grounds. In the first instance, it should be recognised that the units will remain in '*holiday only*' occupation and thus the removal of condition 11 will not involve a change in the vulnerability classification as per NPPG. Furthermore, the application will not result in an increase in the number of static caravans above the 30 approved at the site or any intensification significantly affecting flood risk.
- 4.3 The South Holland Strategic Flood Risk Assessment Flood Depth Maps show the site to be have a potential risk of flooding to a depth of between 0.00-0.50m with a velocity of a maximum 0.3 metre per second. Therefore, extending occupancy during winter months would not significantly increase the level of risk in accordance with the mitigation measures obligated onsite such as raised floor levels and tethering units to their bases. Furthermore, the permission allows unrestricted year-round holiday occupancy of the cottages on site, thus a clear precedent has been established concerning the availability of appropriate site evacuation.
- 4.4 To summarise, most of the caravans are located in Flood Zone 1, the floor levels are raised 500mm above ground level, the units are anchored to the ground, and year-round occupancy of the site for holiday use is established by the cottages. Therefore, balancing the negligible risk associated with the four-month season extension, against the financial implications of the four-month closure, the imposition of condition 11 is not considered relevant or just.

5.0 Conclusion

- 5.1 Planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. This planning statement has confirmed that the imposition of condition 11 is not necessary given the mitigation measure that are imposed on the units. Furthermore, the financial disadvantage that this condition inflicts upon the business is not considered reasonable given the low risk associated with the flood vulnerability of the site and the temporary nature of holiday occupancy.
- 5.2 Therefore, the proposal is considered acceptable, bringing the licence up-to modern standards and allowing the business to commercially compete within a highly competitive market. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act, GA Associates respectfully request that officers allow the removal of condition 11 without delay.

GRAHAM ANTHONY ASSOCIATES

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