June 2017

Planning Statement

Springfields Shopping
& Festival Gardens
Spalding, PE12 6EU

Proposed Family Entertainment Centre
And Change of use of Playbarn
From Class D2 (Leisure) to
Class A3 (café/restaurant) use
And associated works

On behalf of
UBS Triton Property Fund

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1. Introduction

1.1 This Planning Statement has been prepared on behalf of UBS Triton Property Fund in support of an application seeking full planning permission for a new extended play area for children comprising a family entertainment centre incorporating a range of new and exciting activities.

1.2 A key element of the overall offer is the JCB young driver diggerland which is an important brand name and one which took some consideration to attract to Spalding. JCB have commented recently on this new opportunity as follows *"we are hugely excited by the plans for our biggest ever JCB Young Drivers Zone at Springfields. A great deal of thought and time has gone into the design of the Zone which will give young JCB fans a fantastic outdoor space to explore whether driving, building, climbing or sliding. We know the site and location well and we're confident it will be a real hit with young families from all around the region"*.

1.3 Along with other activities providing a leisure based family offer, the entertainment centre will enhance the existing tourist role of Springfields.

1.4 The family entertainment centre will include a variety of new play activities for children in the Festival Gardens at the Springfields complex. It will also pump prime refurbishment and investment in existing facilities to ensure they make a real contribution to the Springfields offer. They are currently underused and not functioning as they were originally intended to as part of the overall tourist offer.

1.5 Activities provided within the leisure area will include the JCB Young Drivers Zone, improvements to the existing train running on the site with a new train station, a high top hobbit village for adventure play, a sheltered infant sand play and café area, refurbishment of the existing mini golf facility, a gold panning activity area, space for picnics, a portable stage and an area for remote control boats. All the above would be provided in a secure area enclosed by a 1 metre high perimeter fence.

1.6 The entrance to the leisure play area will be through the existing playbarn building in the middle of the gardens. This will incorporate the entrance and exit turnstiles but will also be converted to an American themed Diner on the ground floor with cooking and kitchen area, along with a new mezzanine which would be used as party rooms.

1.7 In light of the changes to the use of the Playbarn building, the application includes for change of use of the building from leisure (Class D1) to café/restaurant (Class A3).

1.8 Taken together, provision of the leisure based family entertainment centre in the Springfields complex, will enhance the tourist role and function which Springifields currently provides.

1.9 The improvements to Springfields will also further support the objectives of an important local charity, Springfields Horticultural Society. The Society was established in 1966 to manage the gardens as the shop window of the UK flower bulb industry and to organise the world famous Spalding Flower Parade.

1.10 For over fifty years one of the main beneficiaries of the Society's charitable work continues to be the general public who have free access throughout the year to the 15 acre Springfields Festival Gardens.

1.11 The gardens are maintained and managed by the Society and are principally used to raise awareness of the growing of flowers from bulbs, as well as the lifestyle benefits of the horticulture heritage of the South Holland area as well as to educate and instruct local children and students about general horticultural and gardening practices.

1.12 Prior to submission of the proposal, pre-application discussions were held with planning officers (Richard Fiddler) to agree the nature and scope of information required to support the application.

1.13 This Statement describes the application site and proposed development before assessing the proposal against the development plan and relevant material considerations. The latter includes the requirements of the National Planning Policy Framework (NPPF) and associated guidance.

1.14 The report proceeds as follows:

- Section 2 describes the application site and the proposed development;
- Section 3 provides an overview of planning policy;
- Section 4 provides an assessment of planning merits; and
- Section 5 sets out our conclusions.

2. Site Description & Proposed Development

2.1 The application site measures 0.63 hectares is formed by an area within the Festival Gardens which would be enclosed by 1 metre high fencing to provide a leisure based family entertainment centre within the wider Springfields complex.

2.2 The application site is therefore contained within the gardens area and bound on all sides by the existing complex. To the east is a high soft landscaped bund towards the A16 (T) Road. South, north and west are further parts of the wider gardens area which would remain open to the public and free to enter as they currently are.

2.3 The existing site is therefore formed by a mix of existing gardens area and some existing leisure activities which are run down and in need of investment. This includes the miniature golf and railway located in the eastern part of the gardens.

2.4 The site also includes the existing Playbarn building situated towards the central part of the gardens area. This building was originally built as a playbarn but is currently used for general activities including a toy display with further displays towards the front of the building with café seating and servery area.

2.5 The concept being proposed is a unique family entertainment offer with only a limited number of franchises available throughout the UK. The proposal would involve both the improvement and refurbishment of existing play facilities on the site such as the mini golf and investment in the miniature railway to provide a station and general improvement works, and the provision of new play activities to be managed and operated within a single leisure area within the wider site.

2.6 New provision will include a young JCB diggerland drivers area where children can drive miniature diggers and other vehicles. This area would include a variety of play activities including a high tube slide, climbing area on brick stacks, a surfaced road area around a circuit for miniature vehicles, an area for building with rubber bricks and a play tunnel.

2.7 The JCB brand is well known and has quite a strong appeal in the regions there the Junior Drivers Club concept has already been developed. It will be a unique offer within the county and provides an opportunity to establish a popular leisure destination in Spalding that has a broad family appeal spanning several age groups and sits comfortably with the retail outlet offer.

2.8 In this context the market catchment for this type of family entertainment facility typically will attract from a relatively wide area and will also attract children's party groups and education visits. The JCB Young Drivers Club will create a family sanctuary for local youngsters with "Saturday Club" and will offer sessions to special interest groups.

2.9 Planning Solutions Limited have been contracted to operate the family entertainment centre on behalf of Springfields and have been involved with the concept and design development from the outset and are fully supportive of the scheme's objectives. They have been involved throughout the design development process providing hands on advice for each element. JCB have also expressed considerable enthusiasm for this joint venture approach.

2.10 Planning Solutions Limited operate a number of family based visitor attractions in the UK and therefore have considerable expertise in this market. They current operate

sites ranging from the Conkers Discovery Centre and the National Brewery Centre in the Midlands to Kent Life (a heritage farm park in Kent) and the Cotswolds Country Park and Beach in Gloucestershire. They bring extensive experience in this field to ensure the proposal is designed and operated in a manner that would complement the wider Springfields complex and bring greatest benefits to the town.

2.11 In the north eastern part of the site is a proposed pond for remote control boats with refurbishment of the mini golf area. Although the pond currently exists it requires improvements.

2.12 Close to the above would be a new picnic area for those wanting to spend a longer time in the entertainment centre.

2.13 The central part of the site would be the main general circulation area leading to the infant sand & water undercover area which would be located outside the existing playbarn building. The infant play area would be covered and include an outdoor café / restaurant area, paddling pools and other play equipment.

2.14 The former playbarn building would become the entrance / exit kiosk with an American themed Diner on the ground floor and party rooms on the mezzanine floor.

2.15 In the southern part of the site activities would include the High Top Hobbit village comprising a series of timber based tower features with interconnecting walkways and netting suspended above the ground. A variety of other features would be provided in this area to aid adventure play.

2.16 Outside the hobbit village would be the 'Panning for Gold' activity which includes a sheltered area with troughs underneath that are filled with water and grit sand and 'treasure'. These lined timber troughs would be provided around the edge of the shelter with standing access from either side.

2.17 Facilities associated with the miniature railway would be enhanced through construction of a train station including seating and sheltered area for passengers. This would improve an existing facility on the site.

2.18 Overall, the proposal would provide an attractive leisure based family entertainment centre focused on play for younger children and providing a range of new play activities on the overall site. It would also result in the investment improve existing facilities (i.e. the miniature golf, miniature railway) that over time have become run down and in need of investment.

2.19 Taken together it will provide a vibrant and attractive tourist destination for visitors to Spalding and the wider Lincolnshire area.

2.20 As highlighted above, the family entertainment centre site forms part of the wider Springfields complex, which provides a key element of the overall tourist offer in this part of Lincolnshire.

2.21 In the twelve years since Springfields opened, it has become one of the area's most visited tourist attractions, bringing more than 2.3 million people to Spalding each year, from far and wide.

2.22 Springfields is one of South Lincolnshire's major success stories with the outlet offer sitting alongside the backdrop offered by the Festival Gardens and Exhibition Centre providing an all year around attraction. With a draw from an extensive catchment area

for visitors and more than 50 high quality outlet retailers, the centre provides an attractive tourist destination.

2.23 The centre employs around 500 people of which around 90% live within a relatively short distance to travel to work.

2.24 Springfields is served by existing bus services operating along Holbeach Road towards central Spalding and is within walking distance from residential areas to the south and west.

2.25 The adopted Local Plan Proposals Map shows a cycle way (Policy T2) running along Holbeach Road to the south of the overall complex. A water taxi also operates during the main summer months providing a link between Springfields and Spalding town centre.

2.26 The site therefore forms part of a wide complex which is accessible by a choice of transport mode.

2.27 Continued investment in the centre is taking place to ensure it continues to provide an attractive tourist destination in the wider Lincolnshire area and beyond. The current proposals form an important part of the overall investment in the Springfields complex.

3. Relevant Planning Policy

The Development Plan

3.1 The development plan for South Holland is provided by the Saved policies of the South Holland Local Plan (July 2006).

3.2 By way of summary, relevant 'saved' policies in the context of this application include the following:

- Policy SG1: General Sustainable Development
- Policy SG2: Distribution of Development
- Policy SG3: Settlement Hierarchy
- Policy SG14: Design and Layout of New Development
- Policy SG15: Facilities for Road Users, Pedestrians & Cyclists
- Policy SG18: Landscaping of New Development
- Policy LT1: Leisure, Recreation and Tourist Facilities

3.3 We deal with the planning merits of the proposed development, taking the above policies as the starting point for our assessment, in Section 4.0.

Material Planning Considerations

National Planning Policy Framework (NPPF)

3.4 The National Planning Policy Framework (NPPF), published in March 2012, is a key material planning consideration in the determination of any planning application.

3.5 The NPPF confirms the purpose of planning is to help achieve sustainable development.

3.6 Paragraph 7 advises there are three dimensions to sustainable development which give rise to the need for the planning system to perform a number of roles including:

- ***"An economic role – contributing to building a strong, responsive and competitive economy.....***
- ***A social role – supporting strong, vibrant and healthy communities..... and***
- ***An environmental role – contributing to protecting and enhancing our natural, built and historic environment…"***

3.7 Paragraph 14 sets out the Government's commitment to supporting sustainable development. In relation to decision taking. At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

3.8 Paragraph 17 sets out 12 core principles which should underpin plan making and decision taking. These include, amongst other things that planning should:

- Not simply be about scrutiny, but instead be a creative exercise to enhance and improve the places in which people live their lives;
- Proactively drive and support sustainable economic development;
- Seek to secure high quality design and a good standard of amenity;

- Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and
- Deliver sufficient community and cultural facilities and services to meet local needs.

3.9 Paragraph 18 onwards identifies how sustainable development is to be delivered under a number of topic areas.

3.10 In relation to *'Building a strong, competitive economy'* paragraph 18 confirms the Government's commitment to securing economic growth to create jobs and prosperity.

3.11 Paragraph 19 places significant weight on the need to support economic growth through the planning system.

3.12 Paragraphs 23-27 deals with *'Ensuring the vitality of town centres'* addressing both local plan preparation and development management.

3.13 Paragraph 23 outlines the Government's aim to ensure that planning policies promote competitive town centre environments for town centre uses. Paragraph 26 states that applications for more than 2,500 m^2 would be required to undertake an assessment of likely impacts.

3.14 Paragraph 28 highlights the importance of *'Supporting a prosperous rural economy'*. In this respect the NPPF supports sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitor, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities.

3.15 Paragraphs 29-41 promotes 'Sustainable Transport' whilst paragraphs 69-78 addresses 'Promoting healthy communities' and includes the need to plan positively for provision and use of community facilities (paragraph 70).

3.16 Finally and in relation to 'Decision Taking' local planning authorities should look for solutions rather than problems, and decision takers at every level should seek to approve applications for sustainable development where possible (paragraph 187).

South East Lincolnshire Local Plan (2011-2036)

3.17 Emerging planning policy is contained in the Publication version of the South East Lincolnshire Local Plan. This was recently published for consultation and is intended to be submitted to the Secretary of State for Examination in the near future.

3.18 As an emerging plan at an advanced stage some weight can be given to the policies and proposals albeit with less weight where outstanding objections are to be heard at the Examination.

3.19 Key relevant policies in the context of this development proposal include:

- Policy 1: Presumption in favour of Sustainable Development
- Policy 2: Spatial Strategy
- Policy 3: Development Management
- Policy 4: Design of New Development
- Policy 5: Strategic Approach to Flood Risk

- Policy 9: Promoting a Stronger Visitor Economy

3.20 A number of supplementary planning documents have been prepared by the Council dealing with different topics but none are directly relevant to this application.

4. Planning Assessment

4.1 Under Section 38(6) of the Planning and compulsory Purchase Act 2004 and Section 70(2) of the Town and country Planning Act 1990, applications are to be determined in accordance with the development plan unless material considerations indicate otherwise.

4.2 The development plan in this instance pre dates publication of the NPPF and therefore advice in Annex 1 of the NPPF is of relevance regarding the weight to be attached to different policies.

4.3 The NPPF highlights a presumption in favour of sustainable development, which is to be a golden thread running through planning, including decision taking.

Sustainable Development

4.4 The **NPPF** identifies three dimensions to sustainable development including economic, social and environmental. We consider the proposed family entertainment centre, forming part of the wider Springfields complex, would be able to make a positive contribution in the context of all three roles.

4.5 In relation to '**economic'** factors, the proposal represents further investment in the Springfields complex by UBS Triton Fund in order to improve the tourist based offer of the centre.

4.6 The additional activities proposed, along with the works associated with the development will provide jobs during the construction / conversion phase as well as provide opportunities for local supply chains to benefit through provision of goods, services and skills.

4.7 The operational phase of the family entertainment centre will also generate new employment opportunities, many of which typically would be attractive to local residents. This would also be the case in the converted play barn building to the Diner.

4.8 Generation of new employment opportunities and the supply of goods / services by local business, would all provide wider spin off benefits for the local economy whilst the proposal would also boost the attractiveness of Spalding as a place to visit.

4.9 As a result of the above the proposed development would provide an important '**social'** role. Provision of employment opportunities would be attractive to local residents given the nature of the work and the ability for job opportunities to fit around an individual's availability. This would lead to gainful employment in the local area.

4.10 In relation to the '**environmental role'**, the proposal involves re-use of some of the existing run down leisure based activities in the gardens area and this will provide a general enhancement of those areas. The new activities are partly using natural materials such as timber in a number of the attractions on the site. It would make use of existing space within the overall complex to enhance its tourist role.

4.11 In dealing with sustainable development, the adopted **South Holland Local Plan**, includes **Policy SG1** which deals with 'General Sustainable Development'. This supports development where the Council is satisfied that the proposal is consistent with the principles of sustainable development.

4.12 The application site forms part of the wider Springfields complex and is therefore in a location which benefits from access by a choice of transport mode. The family entertainment centre would benefit from its location next to the Outlet shopping thus providing activities for children visiting the site as part of a wider tourist or leisure related visit.

4.13 Emerging policy in the Publication Draft South East Lincolnshire Local Plan (SELLP) includes **Policy 1** which sets out the presumption in favour of sustainable development. As highlighted above we consider the proposal would meet the aspirations of the NPPF in the context of economic, social and environmental roles and therefore accords with Policy 1.

4.14 **Policy 3** of the emerging SELLP deals with 'Development Management' but with a strong emphasis on sustainable development. In this context the proposed family entertainment centre would provide a high quality design, use natural and sustainable materials where possible, would not give rise to adverse impacts on amenity and would sit well proximate to existing uses on the wider complex. Consequently, we find no material planning conflict with emerging Policy 3.

4.15 In light of the above we consider the proposed development would contribute to sustainable development in a positive manner as outlined above and comply with adopted and emerging policy for the area.

Spatial Strategy

4.16 Adopted Local Plan **Policy SG2** deals with the distribution of development in the district whilst **Policy SG3** sets out the settlement hierarchy.

4.17 With regard to the development strategy (**Policy SG2**) and given the function of the Springfields complex, including the gardens area, as providing an important tourist facility in the Spalding, it is considered this to be an appropriate location for the family entertainment centre.

4.18 In addition and as indicated above the proposal would make efficient use of land and would be accessible by a choice of transport mode. As the proposed use is associated with the current Outlet Shopping Centre and wider Springfields complex, it would derive the bulk of visits from existing visitors to the complex. As such we find no material conflict with adopted Policy SG2.

4.19 Adopted **Policy SG3** sets out the settlement hierarchy in the district with Spalding identified as the 'Main Town'. Spalding is therefore to be the main location for new development in the district. This broad approach is reflected in the emerging Local Plan with **Policy 2** designating Boston and Spalding as 'Sub-regional Centres'.

4.20 The proposed development would be located in Spalding and would therefore accord with adopted policy and emerging planning policy with respect to the broad location of development in the district.

4.21 We consider that inclusion of the family entertainment centre within the wider Springfields complex would be in accordance with the more strategic approach to development in the adopted and emerging development plan.

Promoting the Tourist Economy

4.22 **Policy LT1** of the adopted Local Plan addresses 'Leisure, Recreation and Tourist Facilities'. In this context the family entertainment centre is proposed as one element of the overall provision of tourist related facilities within the Springfields complex.

4.23 It is therefore designed to incorporate and enhance a number of existing activities in the gardens (i.e. the mini golf and miniature railway) which are currently underused and not making a positive contribution to the overall tourist function of Springfields.

4.24 Given the nature of the use as being one that is specifically directed to enhance an existing visitor attraction in Spalding and its synergy with the function of the wider complex, we consider this to be an appropriate location for the proposed use.

4.25 Furthermore and as already addressed above, the proposal would be accessible by a choice of transport mode, would not give rise to adverse impacts on amenity, would be compatible in terms of scale, character and design with the area in which it is proposed and would have no adverse effects on other interests identified in Policy LT1. Accordingly we find no material conflict with Policy LT1.

4.26 In relation to relevant material considerations, we consider the NPPF and emerging local plan both offer support to the proposed development.

4.27 In this respect the NPPF supports the provision and expansion of tourist and visitor facilities in appropriate locations in rural areas as well as more generally supporting sustainable rural tourism and leisure developments that benefit business in rural area (paragraph 28).

4.28 Although the Springfields complex is located in Spalding and given the surrounding uses and local context is not what might be considered to be a 'rural' area, it is currently located outside the defined development limit for the town. The NPPF gives specific support for investment in tourist related facilities and leisure developments in such locations. The proposal would accord with the general thrust of the NPPF in this regard.

4.29 The **emerging Local Plan** deals more directly the tourism and the important role it has to play in the local economy of south east Lincolnshire.

4.30 The emerging plan seeks to promote a stronger visitor economy in south east Lincolnshire through **Policy 9** which includes reference to 'Springfields Shopping and Festival Gardens'. This section of the policy supports development within the complex.

4.31 It is considered that the proposed development would enhance the tourist role of Springfields whilst not adversely impacting on the existing offer in relation to the outlet centre, the Festival Gardens or the Events and Conference Centre.

4.32 Although an emerging Local Plan to which limited weight can be given, the Publication Version of the Local Plan recognises that visitor attractions like Springfields need to provide facilities other than just Outlet shopping.

4.33 We consider that through improving the provision of family based activities within the wider gardens area, the proposal is likely to lead to increased use of Festival Gardens and provide the opportunity to further enhance the attractiveness of the gardens area generally for visitors.

4.34 The supporting text (paragraph 4.2.6) indicates that proposals to add to the offer to attract a more extensive customer base will be supported.

4.35 The proposed family entertainment centre will help provide a play and leisure based offer that will serve the more extensive customer base attracted to the centre and will help make Springfields a more attractive tourist destination in the region. We therefore find no material planning conflict with emerging Policy 9.

Design of New Development

4.36 Details of the proposed family entertainment centre are included in the pack submitted with the application. As can be evidenced the approach is to use good quality materials and natural materials, such as timber, where possible. The quality of design of the various structures within the entertainment area is high with a desire to provide an attractive tourist offer for children to enjoy.

4.37 The proposal will therefore have regard to its location within the wider Springfields complex and provide an acceptable relationship with the character, form and scale of existing buildings nearby. The conversion of the playbarn building, to form the Diner and entrance / exit to the family entertainment centre, will retain the current character of the building.

4.38 As indicated above the proposal will be accessible by a choice of transport mode and will not harm amenity of residents in the surrounding area. The proposal is located in the eastern part of the Springfields complex, towards the A6(T) road.

4.39 In light of the above we find no material planning conflict with adopted **Policy SG14** or the provisions of emerging **Policy 4**.

Flood Risk

4.40 Policy SG9 of the adopted local plan dealt with flood risk but has not been saved. Policy 5 of the emerging plan provides the strategic approach to flood risk in the emerging local plan. Given the absence of an adopted policy and the current stage of the emerging local plan, the NPPF is an important material consideration.

4.41 As with most of Spalding and the surrounding area, the application site is in Flood Zone 3 as shown on the Environment Agency flood map. In light of this the NPPF (footnote 20) confirms that the application should be supported by a flood risk assessment.

4.42 The implications of flood risk for the proposed users of the family entertainment centre would be the same for those members of the public currently visiting Springfields and the Festival Gardens area. The application site is currently open to members of the public and used for various activities.

4.43 The proposed development would include some additional activities but these are generally outdoor play related and therefore are open and not contained in new buildings. Existing limited buildings in the gardens area (i.e. an existing shed) would be refurbished and utilised for the entrance to the JCB Diggerland. Aside from that external structures are either covered / uncovered canopies or open structures used for play.

4.44 Consequently the current arrangements in place at Springfields for flooding would be the same as the existing and would continue to apply to the continued use of Festival

Gardens by visitors. As such we consider the proposal would not lead to material conflict with the provisions of the NPPF or emerging Policy 5 of the new local plan.

Other Development Management Considerations

4.45 Adopted **Policy SG15** seeks to ensure provision of facilities for road users, pedestrians and cyclists in new development. As the proposed family entertainment facility forms part of the wider Springfields complex it would benefit from access by a choice of means of transport as detailed earlier. Consequently appropriate provision would be made for access by all modes of transport.

4.46 **Policy SG18** deals with the landscaping of new development and requires that where appropriate new developments to incorporate landscaping proposals. In this case the proposed family entertainment centre is being assimilated into the wider 'gardens' area and therefore would be located within extensive soft landscaped areas within the overall complex.

4.47 Some additional hard standing would be provided to provide for walkways through the family entertainment centre but overall the proposal would be contained within a limited part of the overall gardens area. It would provide a beneficial use of part of the wider gardens area and would be likely to attract more visitors to use the wider gardens as well as the Outlet Centre and associated activities.

4.48 Consequently, we do not consider that any material planning harm arises in the context of Policy SG18.

5. Conclusions

5.1 This application seeks permission for refurbishment of existing uses in the gardens area to incorporate provision of a family entertainment centre at Springfields to enhance the attractiveness of the centre to tourists.

5.2 The proposal also includes making use of the existing playbarn building (Class D2) and converting it to an American themed Diner with ancillary party rooms, as well as providing the entrance / exit for the family entertainment area.

5.3 The proposal would complement existing uses at Springfields and add to the wider tourist related offer of the complex.

5.4 It would lead to the creation of new employment opportunities in a location that is accessible by a choice of transport mode for employees and visitors alike and would deliver economic, social and environmental benefits to the local area.

5.5 It would therefore ensure provision of sustainable development in line with the NPPF and gains support from the NPPF in a number of respects including the significant weight which should be place on the need to support economic growth through the planning system.

5.6 The proposal would provide activities that relate to the wider functioning of the Springfields complex as a tourist/leisure destination in Lincolnshire.

5.7 The proposal has been assessed against the development plan as a starting point in consideration of relevant planning policy issues, with account taken of all relevant material considerations.

5.8 In light of the above we consider the proposal would not give rise to material planning harm but would support an existing tourist attraction in the District, provide further employment opportunities and represent a sign of investor confidence in the town.

5.9 Having regard to all the above we consider that planning permission for the proposed family entertainment centre, including a Diner in the existing play barn building, would not give rise to material planning harm but would deliver benefits to the local economy.