

## **LINCOLNSHIRE COUNTY COUNCIL'S RESPONSE TO CONSULTATION ON THE FOLLOWING DEVELOPMENT PROPOSAL**

**District:** East Lindsey District Council

**Application number:** S/090/01044/24

**Application Type:** Outline

**Proposal:** Outline erection of central facilities buildings, siting of static caravans, car parking, internal access roads, landscaping, water features and above and below ground infrastructure for holiday use (with means of access to be considered)

**Location:** Land West of Butlins Skegness, Skegness Road, Ingoldmells

**Response Date:** 5 September 2024

This report includes the Substantive response of the Local Highway and Lead Local Flood Authority to a planning consultation received under the Development Management Order and includes details of any planning conditions or informatives that should be attached in the event that permission is granted and any obligations to be secured by way of a S106 agreement.

### **General Information and Advice**

Please note that although the Definitive Map and Statement proves the existence of any recorded rights of way, there may be further or higher rights that are not shown on this document that the County Council is not currently aware of. This would be especially relevant where the public has had informal access to the site or where there are references to routes across this in maps or other historic documents. As the County Council has received no application to recognise further rights of way affecting the site, no more informed guidance can be offered at this stage.

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## **Highway and Lead Local Flood Authority Report**

**Substantive Response provided in accordance with article 22(5) of The Town and Country Planning (Development Management Procedure) (England) Order 2015:**

**Recommendation: No objection subject to the below planning conditions** as detailed below.

Having given due regard to the appropriate local and national planning policy guidance (in particular the National Planning Policy Framework), Lincolnshire County Council (as Highway Authority and Lead Local Flood Authority) has concluded that the proposed development would not be expected to have an unacceptable impact upon highway safety or a severe residual cumulative impact upon the local highway network or increase surface water flood risk and therefore does not wish to object to this planning application subject to the below planning conditions.

### **Comments:**

The site is located within Ingoldmells, approximately 4km north of Skegness, and encompasses an area of approximately 27.5 hectares. Much of the land is in agricultural use with an area to the east comprising scrubland/grassland.

The site is bordered by the Butlin's Skegness resort and Millfield's Holiday Park, featuring static caravans along the entire eastern boundary. Static caravan pitches are located to the west of the resort, beyond the A52 Roman Bank Road. The area is predominantly characterised by holiday accommodation, leisure, entertainment, and food and beverage facilities catering to visitors.

The proposed access arrangements are to be considered as part of this outline application. The existing vehicular access to the proposed site is from Skegness Road to the north; immediately adjacent to the access point is Beacon Pharmacy and associated car parking area. There is also an access from Roman Bank, providing pedestrian links to leisure, entertainment, and food and beverage facilities as well as the coast.

There are existing ghost island right turns at the Skegness Road access and Roman Bank, with a pedestrian underpass below the latter allowing visitors to access facilities on both sides of Roman Bank/A52.

### **Highway safety**

The visibility at the Skegness Road access is 120m which complies with Manual for Streets (MfS). Skegness Road at this location has a speed limit of 40mph and is an A road, but due to factors including the frequency of junctions, alignment of the road and driver behaviour; visibility in accordance with MfS is deemed appropriate rather than visibility set out in DMRB which are Department for Transport standards for Trunk Roads.

Queuing on the public highway will be kept to a minimum with a checking-in system that allows for up to 15 vehicles to waiting within the site's boundary whilst not obstructing the egress of other vehicles. The dimensions of the existing access are adequate to enable 2 cars to pass in opposing directions and the proposal would therefore not result in an unacceptable impact on highway safety.

To improve pedestrian links, a southern footpath will be provided along the Skegness Road access, providing a link to the informal pedestrian crossing along Skegness Road, as shown on drawing 4848-335E.

### **Highway capacity**

The proposed central car park (for visitors and staff) will comprise up to 80 spaces, of which 10% will be designated for disabled users. Sufficient opportunities for cycle parking will be provided via the sheltered cycle parking within the central facilities area, for up to 250 bikes. Internal access roads/routes for cars, pedestrians, and cyclists will also be provided within the scheme.

There are many opportunities to choose sustainable travel to and from the site. The availability of local sustainable transport modes also allows for visitors to make offsite trips throughout the duration of their stay without the use of their car, should they wish to do so.

There is no precise definition of "severe" with regards to NPPF Paragraph 115, which advises that "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe." Planning Inspector's decisions regarding severity are specific to the locations of each proposal, but have common considerations:

- The highway network is over-capacity, usually for period extending beyond the peak hours
- The level of provision of alternative transport modes
- Whether the level of queuing on the network causes safety issues

In view of these criteria, the Highways and Lead Local Flood Authority does not consider that this proposal would result in a severe impact with regard to NPPF.

### **Travel Plan**

There is no specified threshold for caravan sites, as each proposal is to be assessed independently considering the expected level of movements to and from the development site.

Due to the projected frequency of trips in peak season, the submitted Travel Plan measures are expected to be followed as per the Action Plan.

### **Site Layout**

As this is an outline application with means of access to be considered, the layout has not been reviewed, however the indicative site layout affords good permeability across both the proposed site and existing sites.

### **Flood Risk and Drainage**

As Lead Local Flood Authority, Lincolnshire County Council is required to provide a statutory planning consultation response with regard to Drainage on all Major Applications. This application outlines that during a 1 in 200-year plus climate change (100-years) scenario, flood depths of up to 1m are possible within the site. In terms of Surface Water Flood Risk, there is a very low, or low flood risk to the whole site.

The FRDA includes mitigation measures to be incorporated into the proposed site enabling the development to be safe for its lifetime, which will not increase the flood risk elsewhere, and will reduce flood risk of the site overall. The proposed mitigation measures include raising the finished floor levels of the central facilities building(s), anchoring the caravans to the ground, a Flood Warning and Evacuation Plan, incorporating an easement, and drainage ditch maintenance.

The drainage scheme incorporates a combination of SuDS features including green roofs, a green wall, grasscrete wearing course, filter drains and detention basins. Therefore, the Lead Local Flood Authority does not consider that this proposal would increase flood risk in the immediate vicinity of the site.

### **Off-Site Improvements**

All mitigation, associated with the development, is in the form of S106 requests. These requests are considered to be appropriate mitigation to accommodate the development including enhanced bus services and the implementation/improvement of footway and cycleway infrastructure along Roman Bank, in line with NPPF paragraphs 114 and 116. The proposed site will increase footfall across the full site and the public highway.

A S106 contribution of £238,680.00 is requested to provide footway/cycleway improvements along Roman Bank between the junction of Roman Bank/Skegness Road and Butlin's main eastern entrance on Roman Bank. This will help to promote safe and sustainable traveling methods to and from the site due to increased footfall.

A S106 sum of £375,000.00 is requested to support an increased bus service frequency along the corridor. This will improve the bus service in the locality and encourage safe and sustainable traveling methods to and from the site. This is broken down into £125,000.00 per annum.

### **Planning Conditions:**

In the event that permission is to be given, the following planning conditions should be attached:

#### Highway Condition 00

The development hereby permitted shall be undertaken in accordance with a Construction Management Plan and Method Statement that shall first be approved in writing by the Local Planning Authority. The Plan and Statement shall indicate measures to mitigate the adverse impacts of vehicle activity and the means to manage the drainage of the site during the construction stage of the permitted development. It shall include;

- the phasing of the development to include access construction;

- the on-site parking of all vehicles of site operatives and visitors;
- the on-site loading and unloading of all plant and materials;
- the on-site storage of all plant and materials used in constructing the development;
- wheel washing facilities;
- the routes of construction traffic to and from the site including any off-site routes for the disposal of excavated material and;
- strategy stating how surface water run off on and from the development will be managed during construction and protection measures for any sustainable drainage features. This should include drawing(s) showing how the drainage systems (temporary or permanent) connect to an outfall (temporary or permanent) during construction.

Reason: In the interests of the safety and free passage of those using the adjacent public highway and to ensure that the permitted development is adequately drained without creating or increasing flood risk to land or property adjacent to, or downstream of, the permitted development during construction.

#### Highway Condition 21

No part of the development hereby permitted shall be occupied before the works to improve the Skegness Road access (by means of a southern footway linking to the existing infrastructure) have been certified complete by the Local Planning Authority.

Reason: To ensure the provision of safe and adequate means of access to the permitted development.

#### Highway Condition 27

The permitted development shall not be occupied until those parts of the approved Travel Plan that are identified therein as being capable of implementation before occupation shall be implemented in accordance with the timetable contained therein and shall continue to be implemented for as long as any part of the development is occupied.

Reason: In order that the permitted development conforms to the requirements of the National Planning Policy Framework, by ensuring that access to the site is sustainable and that there is a reduced dependency on the private car for journeys to and from the development.

#### Highway Condition 33

The permitted development shall be undertaken in accordance with a surface water drainage scheme which shall first have been approved in writing by the Local Planning Authority.

The scheme shall:

- be based on sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the development;
- provide flood exceedance routing for storm event greater than 1 in 100 year;
- provide details of how run-off will be safely conveyed and attenuated during storms up to and including the 1 in 100 year critical storm event, with an allowance for climate change, from all hard surfaced areas within the development into the existing local drainage infrastructure and watercourse system without exceeding the run-off rate for the undeveloped site;

- provide attenuation details and discharge rates which shall be restricted to 1.4 litres per second per hectare;
- provide details of the timetable for and any phasing of implementation for the drainage scheme; and
- provide details of how the scheme shall be maintained and managed over the lifetime of the development, including any arrangements for adoption by any public body or Statutory Undertaker and any other arrangements required to secure the operation of the drainage system throughout its lifetime.

No dwelling/ no part of the development shall be occupied until the approved scheme has been completed or provided on the site in accordance with the approved phasing. The approved scheme shall be retained and maintained in full, in accordance with the approved details.

Reason: To ensure that the permitted development is adequately drained without creating or increasing flood risk to land or property adjacent to, or downstream of, or upstream of, the permitted development.

**Informatives:**

O/L Informative

The principle of development is acceptable. As this is an outline application with access to be considered, the layout has not been reviewed. Please make the applicant aware of the requirements for parking, turning and layout as detailed within the Lincolnshire County Council Design Approach.

Highway Informative 04

The road serving the permitted development is approved as a private road which will not be adopted as a Highway Maintainable at the Public Expense (under the Highways Act 1980). As such, the liability for the future maintenance of the road will rest with those who gain access to their property from it.

Highway Informative 08

Please contact the Lincolnshire County Council Streetworks and Permitting Team on 01522 782070 to discuss any proposed statutory utility connections, Section 50 licences and any other works which will be required within the public highway in association with the development permitted under this Consent. This will enable Lincolnshire County Council to assist in the coordination and timings of these works. For further guidance please visit the Highway Authority's website via the following link: Traffic Management - <https://www.lincolnshire.gov.uk/traffic-management>

**Officer's Name: Justine Robson**

**Officer's Title: Senior Development Management Officer**

**Date: 5 September 2024**



**Lincolnshire**  
FIRE & RESCUE

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My Ref: PE25 1NJ  
Your Ref: S/090/01044/24

Planning Authority  
East Lindsey District Council  
Tedder Hall  
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**For the attention of Abbie Marwood**  
Sent by email to [development.control@e-lindsey.gov.uk](mailto:development.control@e-lindsey.gov.uk)

26 July 2024

Dear Madam

**TOWN AND COUNTRY PLANNING ACT 1990  
PLANNING CONSULTATION**

**DEVELOPMENT: OUTLINE ERECTION OF CENTRAL FACILITIES BUILDINGS, SITING OF STATIC CARAVANS, CAR PARKING, INTERNAL ACCESS ROADS, LANDSCAPING, WATER FEATURES AND ABOVE AND BELOW GROUND INFRASTRUCTURE FOR HOLIDAY USE (WITH MEANS OF ACCESS TO BE CONSIDERED)**

**LOCATION: LAND WEST OF BUTLINS SKEGNESS, SKEGNESS ROAD, INGOLDMELLS**

I refer to the outline planning application reference S/090/01044/24. The Fire Authority would make no objection to the application provided that the following items were included within the development:

- I. **Access to buildings for fire appliances and fire fighters must meet with the requirements specified in Building Regulations 2010 (As Amended), Part B5. These requirements may be satisfied with other equivalent standards relating to access for firefighting, in which case those standards should be quoted in correspondence.**
- II. **Lincolnshire Fire and Rescue also requires a minimum carrying capacity for hard standing for pumping appliances of 18 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2010 (As Amended), Part B5. This weight limit would also apply to any private/shared access roads in order to achieve the above item.**
- III. **Lincolnshire Fire and Rescue recommends that fire hydrants be installed within this development at the developer's expense in accordance with the provisions of the Building Regulations 2010 (As Amended), Part B5. However, it is not possible, at this time, to determine the number of fire hydrants required for fire-**

**fighting purposes. The requirement will be determined at the water planning stage when site plans have been submitted by the water companies.**

Should you wish to discuss this matter, please do not hesitate to contact me on the details below.

Yours faithfully

**Zoe Brown**

Fire Safety Inspector

Lincolnshire Fire and Rescue

Telephone: 01522 553868

Email: [fire.safety@lincoln.fire-uk.org](mailto:fire.safety@lincoln.fire-uk.org)

cc: LFRWaterManagement@lincolnshire.gov.uk

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