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Planning Statement
Outline Planning Application for the Erection of up to
17 Dwellings
Land off Moulton Chapel Road, Cowbit

1209 2 PS RJCD MAG

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TABLE OF CONTENTS

1.	EXECUTIVE SUMMARY	1
2.	CHARACTERISTICS OF THE AREA	2
3.	THE SITE.....	2
4.	THE PROPOSAL	3
5.	NATIONAL PLANNING POLICY	3
6.	THE DEVELOPMENT PLAN	7
7.	SOUTH HOLLAND LOCAL PLAN	8
8.	SOUTH EAST LINCOLNSHIRE LOCAL PLAN	9
9.	POLICY ANALYSIS	10
10.	HOUSING TARGETS	10
11.	DISTRIBUTION OF GROWTH	11
12.	ALLOCATIONS / SITE SUITABILITY	12
13.	CONCLUSION.....	13

1. EXECUTIVE SUMMARY

- 1.1. This Planning Statement has been prepared by the Robert Doughty Consultancy on behalf Mr P Smith to support an outline planning application for the erection of up to 17 dwellings on land at Moulton Chapel Road, Cowbit, Lincolnshire. The site lies adjacent to the existing settlement boundary and is contained by the landscape planting for the new A16 to the east, the Moulton Chapel Road (and existing development beyond) to the north, existing development in Cowbit to the west and a substantial hedgerow, trees and drainage ditch to the south.
- 1.2. South Holland has experienced a longstanding shortfall in the delivery of homes and the most recent statement of housing land supply (April 2016) indicates that the authority can only identify a 2.9-year supply in advance of the adoption of the local plan. In order to meet the local need for housing and to boost the supply of housing land nationally, as required by paragraph 49 of the National Planning Policy Framework (NPPF) deliverable sites in sustainable locations, such as this one, need to come forward.
- 1.3. In the absence of a 5-year housing land supply, paragraph 14 of the NPPF applies and local planning authorities should grant planning permission unless:
- “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.....”*
- 1.4. The Planning Application is supported by the following details:
- Indicative block plan
 - Landscape Review
 - Flood Risk Assessment and Drainage Strategy.
- 1.5. The planning application demonstrates that the site is capable of being developed without detrimental impact on the character of the surrounding area and in the absence of any adverse impacts, paragraph 14 of the NPPF indicates that planning permission should be granted.

2. CHARACTERISTICS OF THE AREA

- 2.1. Cowbit is a sizeable settlement in the South Holland district and has a number of facilities that support not only the settlement itself, but also the surrounding community. The village does, however, rely on the proximity to Spalding and the wider range of facilities on offer there. Lying within the fens and area of intensively managed agriculture, Cowbit is bounded to the west by “Barrier bank”, which is the edge of the Cowbit Washlands, part of the defences along the river Welland. Cowbit itself is not at risk of flooding. There is no potential to expand the settlement to the west.
- 2.2. Cowbit lies in the fenland area, typical of this part of Lincolnshire, where the sense of openness is provided more by the “big skies” than longer distance views and far horizons. The horizon is characterised by a general ripple of development with the intervening landscape interspersed by the occasional settlement, farmstead and isolated dwelling.
- 2.3. The recent construction of the A16 has in effect provided a new barrier to the east of Cowbit: separating some of the land and properties in the settlement from the wider agricultural land and open countryside. The road also results in a further manmade addition to the landscape to the east of the settlement.

3. THE SITE

- 3.1. The application site lies to the east of existing properties on Moulton Chapel Road and Backgate and faces frontage development on the northern side of Moulton Chapel Road, beyond which there is further residential development extending north west along Mill Drove South.
- 3.2. The site is presently in agricultural use and generally flat with existing trees and hedges to the boundaries. There are no public rights of way that affect the site and an existing footway with street lighting lies along the Moulton Chapel Road frontage. Any biodiversity on the site is largely contained within the trees and hedges to the site boundaries, which are proposed to be retained.
- 3.3. Public views of the site are mainly from Moulton Chapel Road, when adjacent to the site, and from the roundabout on the A16. The site is screened by the existing hedgerow to the south and the landscaping provided as part of the construction of the A16 and existing

development to the west and north. There are no medium or long distance views of the site.

- 3.4. The impact of the development will be contained by virtue of the proximity and obvious association with the existing settlement.

4. THE PROPOSAL

- 4.1. This application is for outline planning permission for a site of 0.88 ha. The development will comprise:

- The construction of up to 17 dwellings
- Access from Moulton Chapel Road
- Open space and landscaping.
- Affordable housing
- Surface Water Drainage Scheme.

- 4.2. An indicative layout is included in the application, which shows how the site could be developed with a low-density scheme to reflect the edge of settlement character.

- 4.3. All matters, however, are reserved for subsequent approval.

5. NATIONAL PLANNING POLICY

- 5.1. The National Planning Policy Framework (the “NPPF”) sets out Central Government’s planning policies for England and how these are expected to be applied.

Paragraphs 6 and 7 of the NPPF confirm the commitment to sustainable development based on three dimensions:

“an economic role - contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

a social role - supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and

an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and

adapt to climate change including moving to a low carbon economy.”

5.2. This is followed by a commitment to a presumption in favour of sustainable development and at paragraph 14, “For decision-taking this means:

- approving development proposals that accord with the development plan without delay; and
- where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - specific policies in this Framework indicate development should be restricted.”

5.3. Paragraph 49 confirms this to be the case by referring to housing applications and the presumption in favour of development where, as in this case, there is demonstrably not a 5-year housing land supply.

5.4. Paragraph 55 states that local authorities must “promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby.”

5.5. Paragraphs 196 and 197 confirm that applications should be determined in accordance with the Development Plan and that, in such cases, Local Authorities should apply the presumption in favour of development. The core planning principles set out in Paragraph 17 are to underpin plan making and decision making. Set out below are those which principally relate to the provision and location of housing in an area.

- “• Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to the wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.

- Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.
 - Contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this framework.
 - Encourage the effective use of land, by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.
 - 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.”
- 5.6. To deliver sustainable development, the Government is committed to building a strong, competitive economy; ensuring the vitality of town centres, promoting sustainable transport; delivering a wide choice of high quality homes; requiring good design; promoting healthy communities; and meeting the challenge of climate change, flooding and coastal change, whilst conserving and enhancing the natural and historic environment.

Building a Strong, Competitive Economy

- 5.7. Paragraph 20 outlines that to help achieve economic growth, local planning authorities should plan proactively to meet development needs of businesses and support an economy fit for the 21st century. Paragraph 21 goes on to set out that planning policies should recognise and seek to address potential barriers to investment, including a poor quality environment or a lack of infrastructure, services or housing.

Promoting Sustainable Transport

- 5.8. Paragraph 37 sets out that planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.

Delivering a Wide Choice of High Quality Homes

- 5.9. The Government's ambition is to boost significantly the supply of housing (paragraph 47). Paragraph 47 is clear that local planning authorities should:

- “• use their evidence base to ensure their Local Plan meets the full, objectively assessed needs for market and affordable

housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period”.

- 5.10. It goes on to require local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements, with an additional 5% to 20% buffer depending on past performance of delivery. There is also a need to provide a realistic prospect of achieving planned supply and to identify a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15.
- 5.11. There is also a need to illustrate the delivery of both market and affordable housing in a housing trajectory for the plan period and implementation strategy setting out how a five-year supply of housing land to meet the target will be maintained. The approach to housing density is also to be set out.
- 5.12. In respect of windfall sites, paragraph 48 sets out that an allowance may be made if there is compelling evidence that such sites have become available and will prove to be a reliable source of supply. Any allowance will have to be realistic taking account the Strategic Housing Land Availability Assessments (SHLAA), historic windfall delivery rates and not include residential gardens.
- 5.13. Applications are to be considered in the context of the presumption in favour of sustainable development. Relevant policies relating to supply should not be considered to be up to date if a five-year supply of deliverable housing sites cannot be demonstrated (paragraph 49).
- 5.14. Paragraph 50 of the NPPF deals with the need to deliver a wide choice of high quality housing, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. It sets out three specific points. The first is to plan for a mix of housing based on current and future demographic trends and the needs of different groups. The second point is for a Local Authority to identify size, type and tenure and range of housing required in particular locations reflecting local demand. The last point is where affordable housing is required to set policies for meeting that need on site.

- 5.15. In relation to evidence about housing, paragraph 159 is of note. This states that Authorities should have a clear understanding of the full housing need in their area. Reference is made to the preparation of Strategic Housing Market Assessments and Strategic Housing Land Availability Assessments. The scale of housing that the local population is likely to need over the plan period is to be addressed which meets household and population projections, taking account of migration and demographic change; addresses the need for all types of housing, including affordable housing; and, caters for housing demand and the scale of housing supply necessary to meet this demand. There is also a need to look at realistic assumptions concerning availability, suitability and likely economic viability of land to meet the identified need for housing over the plan period.

Requiring Good Design

- 5.16. It is outlined in paragraph 56 that good design is a key aspect of sustainable development, is indivisible from good planning and should contribute positively to making places better for people. It is further set out that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes (paragraph 57).
- 5.17. Paragraph 58 states that planning decisions should aim to ensure that developments will function well and add to the overall quality of the area; establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit; optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks; respond to local character and history, and reflect the identity of local surroundings and materials; create safe and accessible environments; and, are visually attractive as a result of good architecture and appropriate landscaping.

6. THE DEVELOPMENT PLAN

- 6.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that, "If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the

determination must be made in accordance with the plan unless material considerations indicate otherwise.”

- 6.2. The Development Plan for the purposes of this application is comprised of the saved policies of the South Holland Local Plan (the ‘Local Plan’). The Regional Plan for the East Midlands 2009 was revoked in April 2013.
- 6.3. South Holland District Council has joined with Boston Borough Council and Lincolnshire County Council to form the South East Lincolnshire Joint Strategic Planning Committee. This Committee is preparing a joint local plan for the South East Lincolnshire area, comprising all of the administrative areas of Boston Borough Council and South Holland District Council. The Committee proceeded some way towards the production of both a Core Strategy and an Allocations Development Plan document before moving to merge these documents into a single Local Plan. Consultation on the submission version of the Local Plan is currently anticipated in early 2017.
- 6.4. During the process of producing a new local plan the targets for growth across South East Lincolnshire generally and Cowbit specifically have been subject to some change.
- 6.5. The National Planning Policy Framework and the evidence base for the emerging South East Lincolnshire Local Plan are also material considerations in respect of this planning application.

7. SOUTH HOLLAND LOCAL PLAN

- 7.1. A number of saved local plan policies from the 2006 Adopted Local Plan are relevant to the current proposal and these are set out below.
- 7.2. SG2 – Distribution of Development states that new developments should take a sequential approach starting with brownfield sites in a settlement limit and ending with greenfield sites adjacent to the settlement. Development should make efficient use of land, be accessible to a choice of transport modes and be acceptable in terms of transport generation and highways safety.
- 7.3. SG3 – Settlement Hierarchy – Cowbit is defined as an Area Centre, which acts as a service centre for the surrounding rural area and where development can support or improve the role of the settlement.

- 7.4. SG4 – Development in the countryside – states that development should take place outside the settlement boundaries when the need for development outweighs its impact and no other site or solution exists to accommodate the proposed development.
- 7.5. SG6 Community Infrastructure and Impact Assessment - one of the policies applied to Urban Extensions, which requires that new development includes measures to deliver the necessary infrastructure.
- 7.6. SG14 – Design and Layout of New Development – requires development to make a positive contribution to its surroundings, respecting the vernacular architecture of the area.
- 7.7. HS1 and HS2 – set the targets for growth and the arrangements for the monitoring and phasing of residential development. These policies, together with HS3 – new residential allocations, are out of date due to the changing housing need for the area, as represented in the Objective Assessment of Need prepared for the South East Lincolnshire Local Plan and the need to roll the plan period forward.
- 7.8. HS8 – Affordable Housing - one third of new housing provided in new development is required to be affordable housing.

8. SOUTH EAST LINCOLNSHIRE LOCAL PLAN

- 8.1. Consultation was undertaken on a draft Local Plan between 8th January and 19th February 2016. A further consultation on preferred housing sites took place in July August 2016. The Planning Authority is considering the issues arising from this consultation before preparing a publication version of the plan for publication in early 2017.
- 8.2. The Local Plan has little weight in the assessment of planning applications, although the background reports do provide an up to date assessment of housing need and a view of the Joint Committee's expectations for the delivery of growth.
- 8.3. The draft plan includes a number of policies of relevance to the current applications and these are as follows.
- 8.4. Policy 2 – Spatial Strategy – identified Cowbit as a minor service centre, an equivalent place in the hierarchy as Area Centre in the South Holland Local Plan.

- 8.5. Policy 4 – Strategic approach to flood risk states that development should be placed in the areas of lowest flood risk or hazard and should not in itself increase flood risk.
- 8.6. Policy 11 – Meeting objectively assessed housing need – sets out the district target for 430 homes per annum. The Joint Committee expects that each district will endeavour to meet its own housing need and the shortfall in one district in any one year will not be met by extra growth in the other.
- 8.7. Policy 12 – Distribution of Housing Growth – promotes the target of 80 homes in Cowbit.
- 8.8. Policy 14 – Providing a mix of housing – sets out targets for the proportion of houses, split between market housing and affordable housing, to be of different sizes. Up to 50% of market houses are expected to have three bedrooms, whereas up to 40% of affordable housing are expected to have 2 bedrooms.
- 8.9. Policy 15 – Affordable Housing – approximately 50% of demand for housing in South Holland is for affordable Housing. Taking into account viability, the policy suggests that 30% of homes on qualifying housing sites should be affordable.
- 8.10. Policy 30 – promotes safe, accessible, open space and sports and recreation facilities.

9. POLICY ANALYSIS

- 9.1. Clearly the South East Lincolnshire area is between plans, with a range of saved policies and emerging documents all providing some context. Bringing forward a proposal of this nature will require some flexibility of approach. South Holland District Council has demonstrated this flexibility with its approach to a number of development proposals.

10. HOUSING TARGETS

- 10.1. The latest population projections being used by the Local Planning Authority state that 430 homes a year will need to be provided by South Holland. This is down from the 540 new homes promoted in the Preferred Options Core Strategy, but is a significant increase on housing targets in saved local plans and revoked Structure Plans and Regional Strategies. Growth in the area over the plan period is driven both by natural increase (the difference between births and deaths)

and inward migration to meet the demands of local businesses. Although the South East Lincolnshire Local Plan is a joint plan with Boston Borough Council, there is an expectation that the districts will seek to meet their own identified housing target.

- 10.2. Monitoring reports indicate, however, that in the five years since 2011 the delivery of new housing has fallen significantly short of the above target, leading to a significant shortfall building up over time (of 40% of the previous five year's target). The Council in its most recent report on housing land supply could not even identify a 3-year supply, let alone a 5 year one. The Local Plan is palpably out of date and the weight that can be given to its provisions in considering development proposals should be limited accordingly.
- 10.3. This proposal would represent a short-term development proposal that could be delivered in the next five years and would, if that were the case, make its maximum contribution to meeting the five-year demand for housing sites in the short term.

11. DISTRIBUTION OF GROWTH

- 11.1. Cowbit is classified as a minor service centre that should deliver approximately 80 homes over the plan period. The strategic approach to the level and distribution of growth across South East Lincolnshire was subject to general challenge, whereas the target for Cowbit was subject to specific challenge. It can be assumed that the details of the policies will be subject to discussion in future stages of the plan production process and specifically at the examination in public. It is clear, however, that the level of growth for South Holland over the plan period will necessitate a level of growth in and around Cowbit.
- 11.2. Although Spalding is the key location for growth in South Holland settlements such as Cowbit, which are both close to Spalding and serve a rural hinterland, are well placed to help deliver growth across the plan period in a way that will support the overall sustainable distribution of growth to both support the local needs of existing settlements, residents and businesses, but also set a solid foundation for further growth beyond the plan period.
- 11.3. Cowbit has the infrastructure to support this level of growth, although investment may be necessary in areas such as affordable housing and open space.

- 11.4. Many settlements need some new dwellings in order to counter the effect of changing demographics, which may otherwise lead to a shrinking population. In order to maintain local services, many settlements require new growth.
- 11.5. This proposal is therefore, taking into account the increased need for new dwellings over time, in accordance with policies S3 of the Saved Local Plan and Policy 2 of the emerging South East Lincolnshire Local Plan.

12. ALLOCATIONS / SITE SUITABILITY

- 12.1. Although the site lies in a narrow gap between the built-up area of Cowbit and the new A16 bypass, it is outside the settlement boundary as defined within the South Holland Local Plan and the consultation version of the South East Lincolnshire Local Plan. The former document is palpably out of date due to the increased need for homes and the extended plan period. As the site is adjacent to the settlement boundary, fronting existing development and bounded by the A16 bypass, it accords with the principles of sequential assessment for new development sites as set out in policy SG2 of the Local Plan.
- 12.2. The concerns raised by the SHLAA relate to the view that development of the site would extend the settlement to the A16 roundabout, and would be visible from the A16. Moulton Chapel Road is, however, characterised by existing development along much of its length in the vicinity of the A16 and the roundabout. The northern frontage of the road is already occupied by residential and horticultural development, and the view from the A16 to the north of the Moulton Chapel Road roundabout is of a roofscape associated with the existing settlement. This site, however, would not be visible from the A16 due to the existing hedge line and the landscaping planted as part of the road construction. The site is well connected, both physically and visually with the settlement.
- 12.3. There are a number of doubts about the preferred allocations promoted in the draft local plan, which suggests that the growth target is undeliverable without other sites coming forward.
- 12.3.1. COW010 is an existing commercial/horticultural business, and residential development on the site would apparently require

a new access point on third party land and as such there is no certainty it will be delivered.

12.3.2. COW009 and COW008 lie within the centre of the village and have been available for development throughout the current local plan period but remain undeveloped.

12.4. The application site is readily available, can be accessed from the existing road frontage and can come forward in the short term to meet both the overarching need for new homes in South East Lincolnshire and the specific growth targets for Cowbit.

13. CONCLUSION

13.1. This application proposal is for Outline Planning permission for the erection of up to 17 dwellings with all matters reserved for subsequent approval. An indicative layout shows how the site could be developed with a low density scheme on this edge of settlement site.

13.2. Cowbit is identified as an “Area Centre” in the South Holland Local Plan settlement hierarchy (Policy SG3) and is proposed as a “Minor Service Centre” in Policy 2 of the draft South East Lincolnshire Local Plan. These designations are consistent in concluding the settlements such as Cowbit are capable of accommodating sustainable development to support their ongoing role in supporting local residents. The growth targets in the saved local plan are out of date and the targets in the South East Lincolnshire Local Plan, both in terms of overall level and the distribution across the plan area, will clearly need to be subjected to independent testing through the examination process. There is clear evidence that growth targets will increase to account for the longer plan period and the new evidence of need. Development of up to 17 houses in this sustainable location would help meet the current demand for a five years’ supply of housing, whilst not undermining in any way the overarching strategy of the Local Plan.

13.3. The application is supported by a Flood Risk Assessment and Drainage Strategy which demonstrates that the site is safe from flooding and that surface water generated from the development can be satisfactorily dealt with on site. The majority of the site lies within Flood Zone 1 with a smaller area lying within Zone 2 and, therefore, it is sequentially preferable to other sites identified within the emerging Local Plan.

- 13.4. The site is physically well connected to Cowbit, is screened from external views from the A16, is readily accessible for utilities and is not subject to any major constraints such as flood risk, contamination, bad neighbour land uses, heritage and landscape or biodiversity issues.
- 13.5. The illustrative layout responds to the character of the area and the proximity of neighbouring land uses.
- 13.6. Paragraph 14 of the NPPF requires that where local plan policies are out-of-date (in this case the significant shortfall in the 5-year housing land supply), planning permission should be granted unless any adverse impacts would significantly and demonstrably outweigh the benefits. Accordingly, the severe housing land supply issue weighs heavily in favour of the grant of permission, especially in the absence of any significant harm.

