

James Road, Crowland

Design and Access Statement

August 2019

Client: AD, RM, JM & B Alcock

Project: Outline application for the erection of up to 6 self/ custom build flood resistant, eco homes

Project no: 421

Revision: B

Contents

	Page
1.0 Introduction	3
2.0 The Vision	6
3.0 Planning Policy Review & Material Planning Considerations	8
4.0 The Development in Context	37
5.0 Proposed Development	50
6.0 Sustainability	55
7.0 Conclusions	62

1.0 Introduction

1.1

This Design, Access and Design Code Statement accompanies an outline planning application for the erection of six new self-build/ custom-build flood resistant eco homes on land off James Road, Crowland.

The application has been made on the behalf of our clients AD, RM, JM & B Alcock, the owners of the land and the parties seeking to self-build two of the plots.

1.2

The application has been submitted in outline with all matters reserved except access. An illustrative site layout, illustrative house design and illustrative artists impressions have been provided which indicate how the site could be developed to provide a safe sustainable environment for the occupants of the new homes. The final design of the scheme will remain to be agreed with the Council at the Reserved Matters stage.

This is a resubmission of the scheme submitted in September 2017 (Reference: H02-0868-17) that was refused planning permission on the 7th September 2018. That scheme was refused by the planning committee. This decision was made despite there being no objections from the Parish Council, neighbours of the site, LCC Highways, SHDC Environmental, and the Environment Agency. Indeed it should be noted that the Council Housing Officer confirmed that the six self build plots would make a contribution to the need within the District for self-build plots.

1.3

The reasons for refusal have been reproduced here and interspersed with our comments in response to the points made.

'The site, by virtue of its location, is poorly related to the existing built-up residential area of Crowland. The site is physically and functionally detached from Crowland, its existing and proposed settlement boundary and is located in the open countryside.'

We disagree with the premise that the site is physically and functionally detached from Crowland and that the site is located in the open countryside.

Crowland is denoted within the newly Adopted South East Lincolnshire Local Plan 2019 as a Main Service Centre making it a highly sustainable settlement and a settlement expected to make a significant contribution to housing supply. The application site currently has an existing pedestrian and cycle connection to Postland Road and would have a new vehicular access on to James Road. The site is also very close to bus stops on Postland Road. Each new home would be provided with electric car charging points with electricity provided by photovoltaic modules and batteries. All of these modes of transport are highly sustainable and whilst it is accepted that in rural areas there has to be some dependence on the motor vehicle this would be limited due to the other options available to the occupants of the home and the potential for very short journeys to the centre of Crowland and the nearby City of Peterborough.

The application site in its current form is physically and functionally attached to Crowland. It is not 'remote' from Crowland. There is currently a pedestrian, cycle and vehicular access from the site to Postland Road so it cannot be argued that functionally the site would be detached from Crowland because it already exists. Physically the site is bounded by mature landscaping to the north and south of the application site and Crowland

Caravans and Camping to the west. To the east the application site is bounded by a drain which alongside the mature landscaping form the main defined visual boundary of Crowland when entering the settlement along James Road from the north-east. On that basis it cannot therefore be argued that the application site is physically detached from Crowland and in the open countryside. It is accepted that the site is outside the current settlement boundary as defined in the Adopted South East Lincolnshire Local Plan 2019 but this must be seen in light of a general trend of under performance and delivery of housing, notwithstanding the current 5 year land supply for housing and in particular the lack of allocated sites that deal directly with the shortfall of self/ custom-build plots within the South Holland District. It should also be noted that the 5 year land supply for housing is not an upper limit and Local Authorities can approve more housing where a clear need is shown. The proposals are not isolated dwellings within the countryside and relate well to the settlement around them.

'The result is a development that is considered would be poorly integrated with its surroundings, in particular, with the wider residential areas of Crowland and services and facilities within the town. This is exacerbated by the contrived proposed pedestrian link.'

We do not agree that the development would be poorly integrated with its surroundings. The application site is bounded by landscaping on two sides and an existing commercial use on one side. The only views into the site are from a distance along James Road and new landscaping could be incorporated within the proposals to soften the boundary of the site with the open countryside beyond, reflecting a similar boundary treatment to the existing boundary alongside the Garden Centre to the south of the application site.

We also do not agree that the pedestrian link is contrived. There is an existing pedestrian, cycle and vehicular link from the application site to Postland Road. The new homes simply connect to this existing link. As the pedestrian link already exists it therefore cannot be contrived and offers potential new residents the option to walk or cycle.

'As such, the application is contrary to Policies SG14 and SG15 of the South Holland Local Plan, 2006. These policies seek to promote good design and convenient access. Proposals which fail to take account of the character and context of the surrounding area could undermine the quality of the built environment and will not be permitted. These policies are in general conformity with national guidance, contained in the National Planning Policy Framework, 2018. Therefore, the limited social and economic benefits of delivering a small number of homes in this location is

outweighed by the above identified social and environmental harm. Consequently, the presumption in favour of sustainable development is not considered to apply in this instance.'

It is hard to reconcile the suggestion that the proposals would be a poorly designed scheme without convenient access to services. Crowland is a highly sustainable settlement with a significant amount of services available to homeowners. It is also very close to the city of Peterborough with its commensurate level of facilities and transport links. The proposals incorporate a design code document which ensure high levels of design throughout and also ensure that the sustainability credentials of the new homes are achieved. Given that the application is in outline only with all matters reserved it is hard to understand how it can be determined that the application is contrary to policies relating to good design.

Furthermore we disagree with the limited weight that has been applied to the contribution the proposals would make to housing supply and in particular the self-build/ custom build. Particularly in circumstance where the Council is underperforming and struggling to constantly deliver housing or any sites that are either allocated or been given permission for self-build/ custom build homes. The reason for refusal does not elaborate on the 'identified' social and environmental harm but it is extremely hard to understand how a proposal that seeks to meet an identified need within the district can create social harm. Furthermore the proposals incorporate energy saving measures as well as the option for homeowners to use sustainable transport modes. These measures meet the NPPF's goals of reducing emissions and improving air quality. It also complies with the

definition of sustainable transport set out within the glossary to the NPPF, which defines '**sustainable transport modes**' as follows:

'Any efficient , safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra low emission vehicles, car sharing and public transport.'

Given the above it is hard to reconcile how environmental harm has been identified within the reasons for refusal. It is therefore incorrect to refer to social and environmental harm within the reasons for refusal.

2.0 The Vision

2.1

The Clients brief was to design an environmentally conscious self-build development of eco-homes on land which they currently own. The applicants would design their own homes on at least two of the plots and the remaining plots would be offered to the market to future self-builders looking to create their homes within the South Holland District.

The vision for these proposals is driven by an aim to respond to the Clients brief by creating a self-build development of high architectural quality together with being a highly sustainable scheme which responds to the social and environmental issues surrounding flood risk and Climate Change. The proposals also aim to promote the Government's aspirations to improve the supply of land for self-build/ custom building by providing a site of sufficient size and density which would be an attractive proposition for self-builders. The provision of self-build serviced plots adds diversity and variety to the housing market. Currently there are 44 applicants on the South Holland District Council register.



Plank Drove, Crowland — South Holland District Council. Approved as a Paragraph 55 house in 2015 and currently under construction



Weston Hills Road, Low Fulney—South Holland District Council. Approved 2019 within a settlement classed as 'Open Countryside' and due to commence construction.



Chapel Lane, Letty Green — East Herts Council. Within the Green Belt, approved 2017 on appeal and currently under construction. The Planning Inspector commenting:

'The dwelling would be of a contemporary design of an intrinsically good architectural quality that would satisfy LP Policy ENV1.'



Stringers Lane, Aston — East Herts Council. Approved 2017 and completed 2018.



Cambridge Road, Spellbrook — East Herts Council. Approved 2016 within Green Belt land and completed 2018.

Successful Rural Homes by Studio 11 Architecture

3.0 Planning Policy Review & Material Planning Considerations

3.1 The Need for Housing

There is a substantial need for housing within the South Holland District and in particular an identified need for custom and self-build homes.

The Council have identified a need for 11,681 dwellings across the district over the plan period of 2011—2036 which equates to 467 per annum. The recently published *South Holland District Council 5-year Housing Land Supply Assessment (May 2019)* outlines completions within the District for the period 1st April 2011 to 31st March 2019. Table 2 within the assessment identifies a shortfall in housing of 1074 dwellings over this period. This equates to a shortfall of 9.2% over the first 8 year period of the newly adopted local plan. If this trend continues over the full local plan period it would equate to a shortfall in housing of 3,356 dwellings.

Within the local plan Crowland has been identified as being able to accommodate 524 new dwellings across the plan period.

The Council have identified the ‘Liverpool’ method of calculation as their preferred method of calculating housing land supply on the basis that during the Local Plan Examination could consider its 5-year housing land supply under the Liverpool method. Both the Liverpool and Sedgefield method have been calculated as part of the recently published *South Holland District Council 5-year Housing Land Supply*.

The key calculated figures are:

Liverpool method—6.07 years

Sedgefield method—4.72 years

Whilst it is accepted that the National Planning Policy

Framework does not favour one method over the other, the accompanying Planning Policy Guidance document does favour the ‘Sedgefield’ method stating, “*local planning authorities should aim to deal with any undersupply within the first five years of the local plan period where possible*”. We agree with the PPG document given that there has been a persistent undersupply of housing within the District in 7 of the last 8 years.

The deficit in the supply of housing is longstanding with only the 2018/ 2019 period delivering the required number of completions in the previous 8 years. In fact the published figure of 809 completions within the *South Holland District Council 5-year Housing Land Supply Assessment (May 2019)* includes 315 completions not previously counted in the period 1st April 2011 to 31st March 2019. This means

that the actual completion figure for the year 2018/ 2019 is 494. Whilst it is accepted that this still meets the requirement for the year it does demonstrate that the District is highly likely to continue to struggle to deliver the minimum completions each year for the length of the plan if the current shortfall in housing supply is not dealt with.

The deficit has adversely affected the affordability of housing. The table below sets out the ratio of lower- quartile house prices to lower-quartile incomes, which reflects the actual affordability of housing in an area, for those most in need of suitable homes. The table below demonstrates that housing has been becoming significantly less affordable in the South Holland District over the last 20 years, and this trend appears to be accelerating. It shows that people on lower quartile incomes would need to raise a mortgage of nearly 8 times a

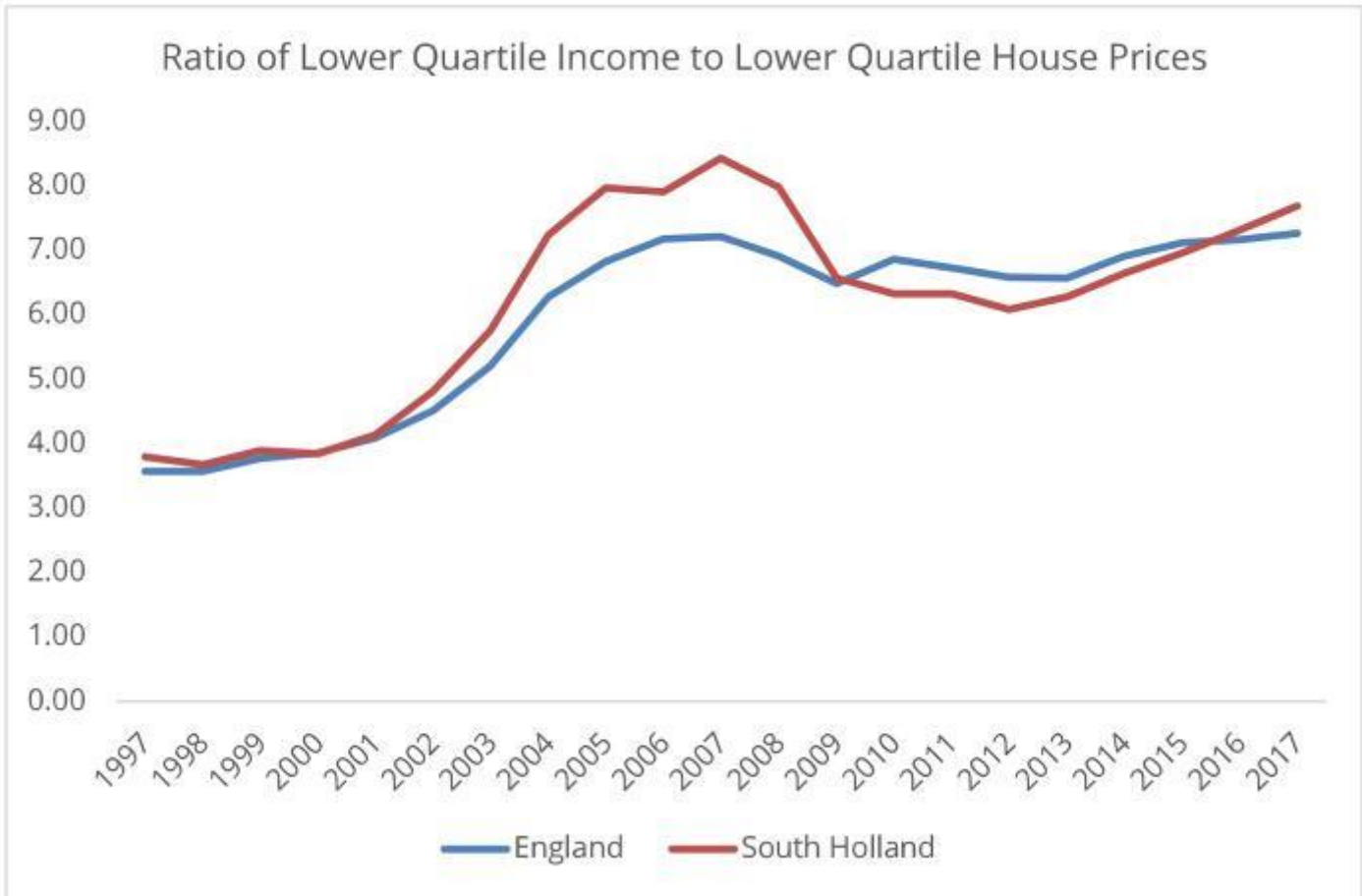


Table showing the relative affordability of housing in South Holland when compared with the County and National averages
Information taken from ‘Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2017’, Office for National Statistics (26th April 2018)

typical lower quartile salary in order to buy a house. As such, housing is clearly unaffordable to those on lower incomes, and this situation is becoming worse. This in itself demonstrates the continuing need for as much housing as possible, in order to reverse this trend and make housing more easily accessible for all; the only way of addressing the affordability of housing in the long term is to increase supply, to better meet demand.

The table shows a dip following the recession which began in 2008. This does not imply that the affordability of housing improved, only that its price dropped. This was in response to a lack of demand, due to people being unable to access credit for mortgages. This underlying need and demand for housing did not dissipate in this time and it has fuelled a rise in recent years to a level which is comparable to the situation prior to the recession. This rise is itself an indication of an imbalance between supply and demand. It is now higher in South Holland than the national average, indicating that the imbalance is particularly acute here. In this context, the housing which would be provided by this application is very valuable. It is only where the supply of housing is increased that affordability can be stabilised in the long-term.

3.2 The Need for Self-Build and Custom-Build Housing

The Government now recognise that self-build and custom-build housing is an aspect of housing need which must be addressed specifically, to ensure that demand is met. It was previously addressed within paragraph 159 of the NPPF 2012, which required local planning authorities to take it into account, along with the demand for housing. However, this did not lead to any significant level of provision of land for

use by self and custom builders. The new NPPF also contains a requirement for the provision of land for this type of housing, at paragraph 66:

'Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).'

The Council are currently failing to meet the full objectively assessed need for housing in this respect. In the absence of any land having been identified, it is necessary for individuals to identify their own plots.

The newly adopted Local Plan fails to make specific provision for custom and self-build housing but does state within Policy 17 that *'The Local Plan will also seek to meet the housing needs of non travelling Gypsy and Traveller households and also custom and self builders as they may come forward.'* These are the only points at which the Local Plan mentions this topic. It is not at all clear how the Local Plan may meet these requirements, as no land is proposed to be provided for this need, and there is no policy mechanism which may provide a supply of land, i.e. through the provision of a proportion of large housing sites. As such, whilst the matter is mentioned, no direct action is proposed and nothing will change during the life of the Local Plan.

The Self-Build and Custom Housebuilding Act 2015, as amended by the Housing and Planning Act 2016, requires local authorities, including district councils, to keep a register of people who are seeking land to construct their own self-build homes. The Act also contains a **'duty'**, which requires local planning authorities to grant planning permission for sufficient plots for self-builders to meet the level of demand. This is established by the number of people registering for plots, and the level of demand in each 12-month period must be met within the following 3 years.

The Act requires local planning authorities to have regard to guidance provided by the Secretary of State, namely the PPG. This sets out the duty which local planning authorities are under in this regard. It also notes the following:

'The planning functions of an authority may include both plan-making and decision-taking functions. The registers that relate to their area may be a material consideration in decision-taking. Relevant authorities with plan-making functions should use their evidence on demand for this form of housing from the registers that relate to their area in developing their Local Plan and associated.'

The Councils progress with complying with this duty is therefore highly relevant to this planning application. We requested that the Council inform us of the number of people on the custom and self-build register within the South Holland District, and also the Councils progress in identifying available plots for these people. The Councils response is included on the following page. This notes both that there are currently 42 people on the register, and that ***'the council does not monitor custom and self-build plots available for sale in the district.'***

Date: 10/09/18
 Our reference: SFOI-005866
 Your reference:

Mr Akehurst



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Yours sincerely

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Dear Mr Akehurst

SHDC FOI RE - Self Build Ref: SFOI-005866

Your request for information has now been considered and South Holland District Council's response is below.

1. The number of self-build sites available in South Holland as of today

The council does not monitor custom and self-build plots available for sale in the district.

2. The number of people on the self-build register.

There are 42 people on the register.

If you require any further information, or are not happy with the information that you have been provided with or if you are not happy with the way that your request has been handled you may request an internal review.

If you have any queries or concerns then please contact us at:

Freedom of Information Team
 Council Offices
 Priory Road
 Spalding
 Lincolnshire
 PE11 2XE
FOI@sholland.gov.uk

Further information is also available from the Information Commissioner at:
 Information Commissioner's Office
 Wycliffe House
 Water Lane
 Wilmslow
 Cheshire
 SK9 5AF
 The link below will refer you to the ICO website, which may be of use:

Response from South Holland District Council—Freedom of Information Request Regarding Self-Build and Custom-Build Housing

This is a startling admission—the Council are very clearly failing to pay any regard to fulfilling its duty.

This is reinforced by a recent appeal decision (APP/G2435/W/18/3214451 & APP/G2435/Q/18/3214498) on a site of 30 self/ custom build homes outside the development limits of the Local Plan within the village of Woodville. In reviewing the appeal the Inspector took the view that whilst the appeal site was on the fringe of the settlement it was adjacent to the built form and was well contained within its own setting. He also took the view that whilst the 133 single dwelling permissions the Council identified could be developed as self/ custom build-homes there was no specific conditions to ensure that they would be developed in accordance with the legal definition of self-build and custom housebuilding definition in the Self-Build and Custom Housebuilding 2015 (as amended). And on that basis he could not conclude that these permissions would contribute to the identified need within the self-build/ custom-build register. He did however conclude that the appeal site would contribute to what he considered to be an identified housing need given the current NPPG states:

‘...relevant authorities could include policies in their local plans for self and custom housebuilding, but this is not a requirement. It also states that relevant authorities could seek to meet demand by engaging with landowners who own sites that are suitable for housing. The only requirement is that the Council has a duty to grant planning permission for enough suitable serviced plots of land to meet the demand of self-build and custom housebuilding in their area.’

The Inspector goes on to confirm:

‘...the Council is required by the provisions in Section 2A of the Self-Build and Custom Housebuilding Act 2015 (as

amended) to grant planning permission for enough serviced plots of land to meet the demand for self-build and custom housebuilding in the District which arises in each base period. I consider the appeal proposal is necessary to enable the Council to meet its statutory obligations with respect to the duty under Section 2A of the Self-Build and Custom Housebuilding Act 2015 (as amended), given that there appears to be an inadequate supply of serviced plots coming forward for development in the District.’

We believe that the Council’s failure to meet, or even consider, its duty to provide plots for self-builders is highly material to this planning application, as set out in national policy and guidance as well as the above recent planning appeal. It is clearly not a matter to which the Council have given any great consideration. It is also clearly not something which the Council will play any part in addressing in the near future given that there are no specific policies within the newly Adopted Local Plan which will address the need to provide serviced plots for Self-Build and Custom housebuilding. In this context, it is necessary for the market to step in to provide land for this type of housing.

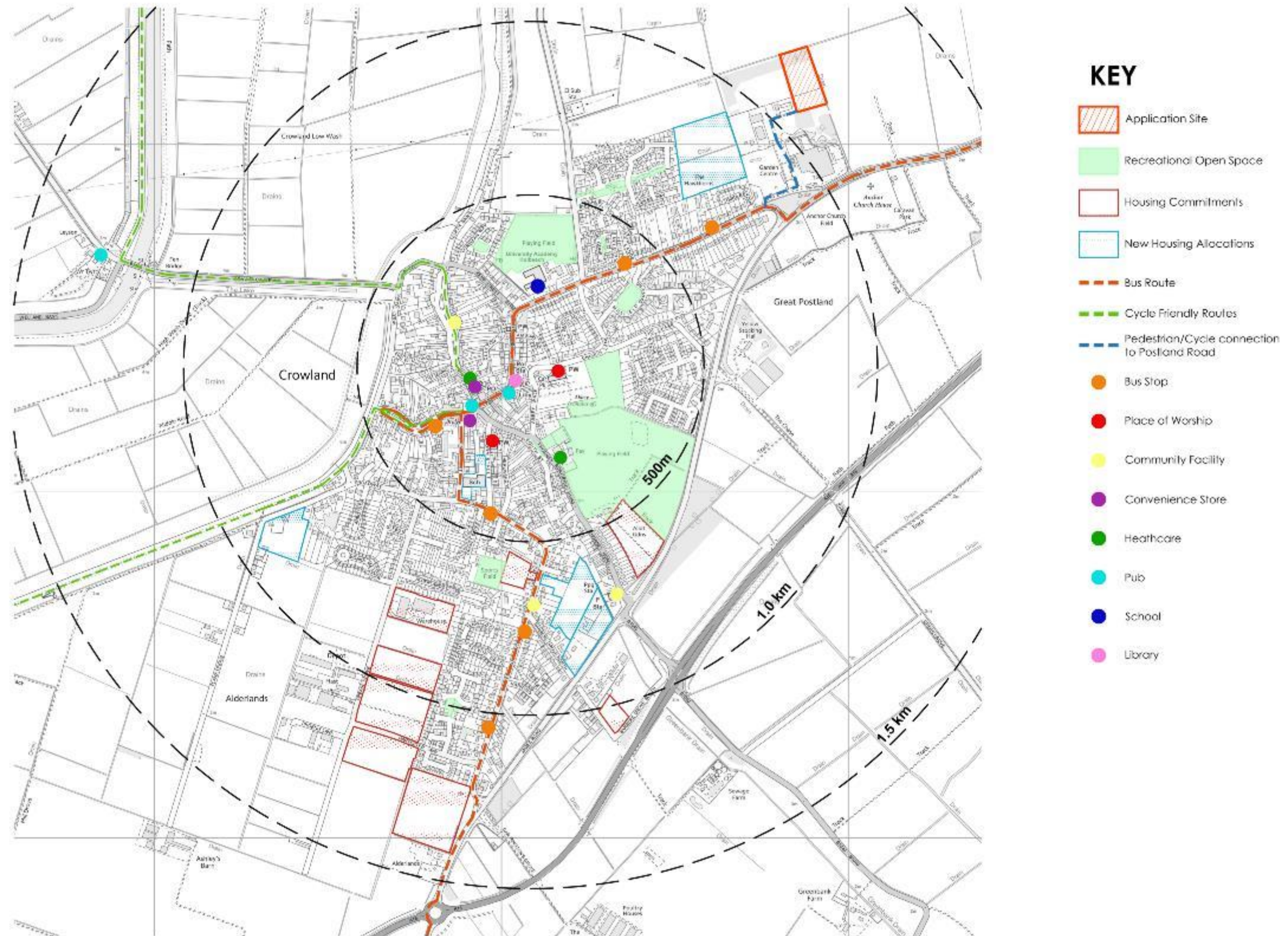
The Inspector also went on to consider the appeal site in relation to achieving sustainable development in the context of Self-Build and Custom housebuilding:

‘...Paragraph 8 of the NPPF 2019 states “Achieving sustainable development means that the planning system has three overarching objectives”, which are identified as economic, social and environmental. In my view the appeal proposal would make a positive contribution towards achieving all three of these.

I attach substantial weight in terms of the economic benefits that would arise from the provision of 30 dwellings in Woodville. The new residents that would live in these homes are likely to use and support local services, local facilities and local businesses. Therefore, the proposal is likely to make a positive contribution to the local economy. The development of each property should create opportunities for local builders, tradesmen and builders merchants. This has the potential to create local employment and training opportunities.

In terms of the social benefits, the proposal would be able to meet most of the current demand for self and custom build plots in the District. The appeal proposal does not represent unnecessary development because it would greatly assist NWLDC to meet its statutory obligations with respect to providing serviced plots for self-build and custom build housing. This would ensure that the proposed development plays a major role in meeting an evidenced housing need in North West Leicestershire.

In summary, the appeal proposal provides an opportunity to comprehensively meet the majority of the current demand for self and custom-build plots in the District on a sustainably located site. On balance I consider that the economic, social and environmental benefits of the proposal significantly and demonstrably outweigh the conflict with the development plan. It is therefore concluded that there are material considerations in this case to justify a departure from the development plan in accordance with the statutory provisions outlined under Section 38(6) of the Planning and Compulsory Purchase Act 2004.’



The Application Site in its Broad Context

It is clear from the narrative of the Inspectors appeal decision that he considers that self-build and custom housebuilding is a form of housing that can have an evidenced need. It is also clear that he considers that the statutory obligations contained within the Self-Build and Custom Housebuilding Act 2015 (as amended) area sufficient material planning consideration to allow a departure from the development plan.

3.3 A Sustainable Location for Development

A clear driver of the National Planning Policy Framework (NPPF) in relation to new housing is to contribute to the achievement of sustainable development.

Paragraph 103 of the NPPF 2019 states:

‘ Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.’

The focus of paragraph 103 is on a choice of sustainable transport modes with the aim of reducing congestion, emissions and improving air quality. It also recognises that the opportunities for sustainable transport solutions will vary between urban and rural areas and this should be taken into account in decision making.

Crowland is a sustainable location for development. It is well provided with local services including a nationally acclaimed Doctors Practice, shops, a post office, an Abbey and Chapel together with community and education facilities. Its proximity to public transport links to Spalding and Peterborough, with their substantial range of facilities and services, mean that residents day to day needs can be met in a sustainable way. The South East Lincolnshire Local Plan identifies Crowland as a Main Service Centre which provides key facilities to Crowland itself as well as the surrounding rural areas.

The application site will be provided with a new footpath connection to the existing footpath located to the west of the former Crowland Garden Centre. This will provide safe walking and cycling access to Postland Road and the centre of Crowland beyond.

A bus stop on nearby Postland Road provides access to service 37 (daily service linking Peterborough and Spalding). Excellent national rail services are accessible from Peterborough providing access to London and Edinburgh via the East Coast Mainline.

It is accepted that low emission vehicles are a sustainable method of transport and this scheme is designed to take advantage of, and encourage the home occupiers to use low emission vehicles where possible. Each home will be provided with two electric car charging points which will allow the occupants to use a battery electric vehicle, plug-in hybrid vehicle or extended range electric vehicle on a daily basis. Each home will also be provided with electric

battery storage to store electricity generated by photovoltaic modules during the day for use in charging vehicles during the night. This creates a genuinely low carbon alternative to the conventional car, whereby vehicles can be powered through energy generated on site. This certainly meets the NPPF's goals of reducing emissions and improving air quality. It also complies with the definition of sustainable transport set out within the Glossary to the NPPF, which defines ***‘sustainable transport modes’*** as follows:

‘Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra low emission vehicles, car sharing and public transport.’

In summary, it is evident that the site represents a sustainable location for development. The site is judged as being ‘developable’ in the SHLAA and was proposed as a housing allocation within the SELLP as recently as July 2016 (preferred sites for development consultation). It is located within a Main Service Centre, one of the most sustainable locations within the District. The Highways Authority considers that the site is sustainable in transport terms. Taking account of these considerations and set against the background of a severe shortfall of self-build and custom-build homes, it is clear that the principle of a self-build development of this type in this location is acceptable.

3.4 Economic Sustainability

The proposed development would generate employment during the period of its construction. Given that 6 separate projects would be undertaken, this is likely to generate a higher level of employment than would be the case for a larger house builder completing the 6 dwellings as a single project. These smaller projects are also likely to provide jobs

for local people.

Residential development is also likely to increase the demand for existing services within the settlement and the surrounding area, and so ensure that they are retained in the long-term. There has been a general trend nationally of declining services and facilities in rural communities, due in large part to increasing reliance on car travel, changing trends whereby people will travel further to access even convenience shopping facilities. The additional local demand created by new residents is therefore necessary to ensure that the facilities Crowland has are not lost over time.

Economic sustainability is also enhanced by having a more varied mix of residents within the District and in particular from a more socio economic type of resident. This type of resident would traditionally seek Executive Housing which is currently not catered for within the District to any degree. The increase in provision of Executive Housing would also increase in revenue for the District through higher council tax generated by the provision of homes within the highest tax band. It is highly likely that these people would seek to build their own home through self or custom building if their need wasn't currently catered for within the District or chose to move outside of the District.

The NPPF recognises that the new residential development is a driving force for economic development. The NPPF states that:

'...planning should...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 wider opportunities for growth.'

The role that housing plays, as a driving force for a successful economy, is one of the main reasons that Governments are keen to boost house building in times of economic stress. In addition to the direct benefits outlined above, it is also the case that insufficient housing leads to serious negative effects, such as inflated prices and worsening affordability. It restricts choice in the market, encouraging those who can move further (generally higher earners) to move away, whilst those who cannot are forced to live in housing which does not meet their needs. For these reasons, the NPPF identifies **'any lack of infrastructure, services or housing'** as a **'barrier to investment.'**

Businesses will therefore naturally be drawn to areas with a good supply of housing. They will want to be in an area where all of their employees can find suitable housing, which is affordable to them. They will also want to be located where there is a good range of housing available, from smaller, more affordable housing, to family and executive housing as well as the option to self/ custom build. A lack of any of these types of housing can deter business from locating in any one area.

In light of these considerations, it is clear that a sufficient amount, variety and quality of housing is required not only to avoid stagnation in the local economy and secure existing local jobs, but also stimulate new economic growth. The self/ custom build houses proposed by this application

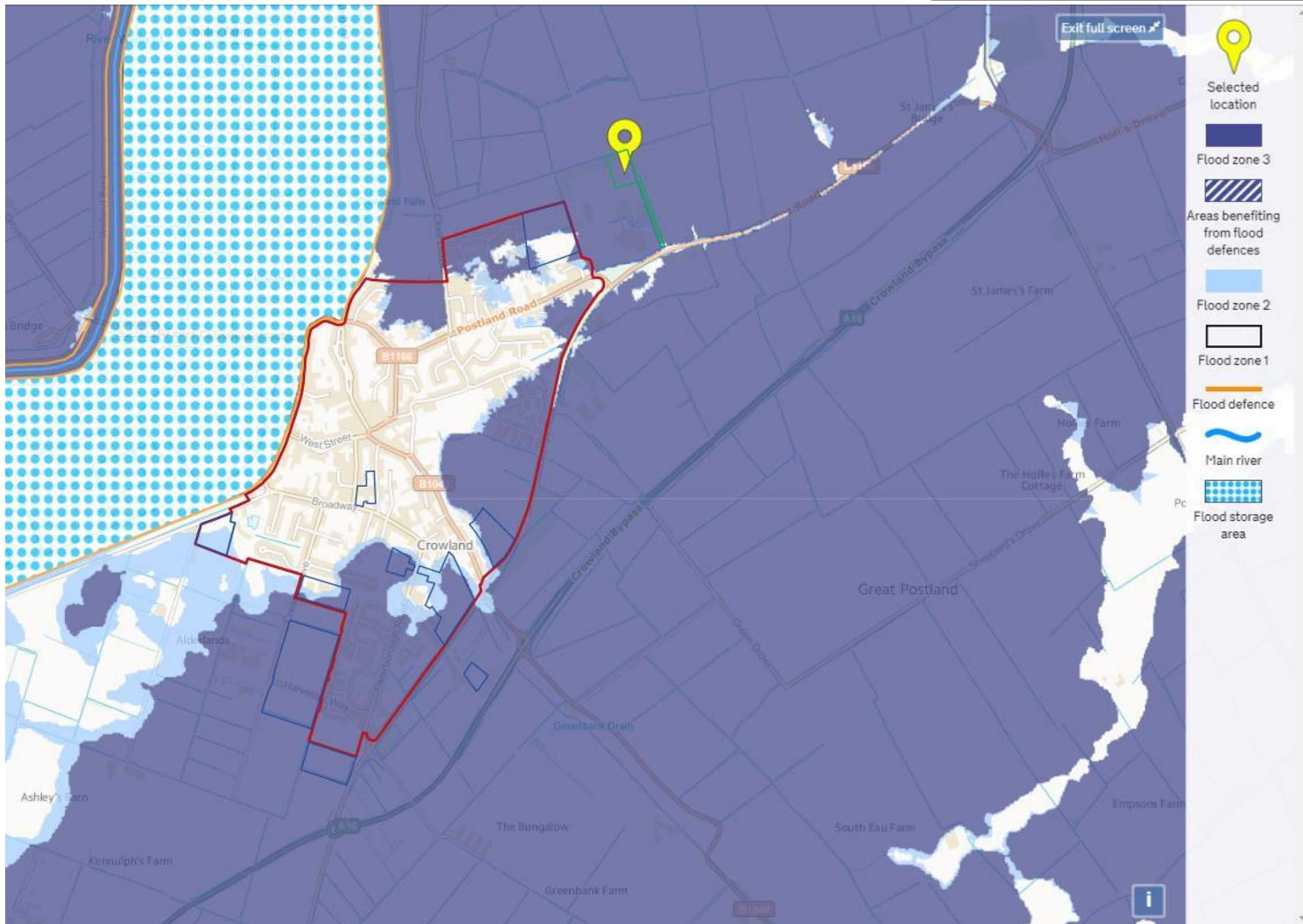
would make a valuable contribution in this regard.

3.5 Environmental Sustainability

The proposed development would be a highly environmentally sustainable form of development. The Design Code confirms that the proposed houses would be designed to be A-rated homes, with a SAP rating of 92 or higher. This would require that each home would generate a significant amount of its own electricity on site, as well as being highly energy and water efficient. It is also proposed that electric car charging points are provided, implying that vehicles used by the occupants could be powered by locally generated energy.

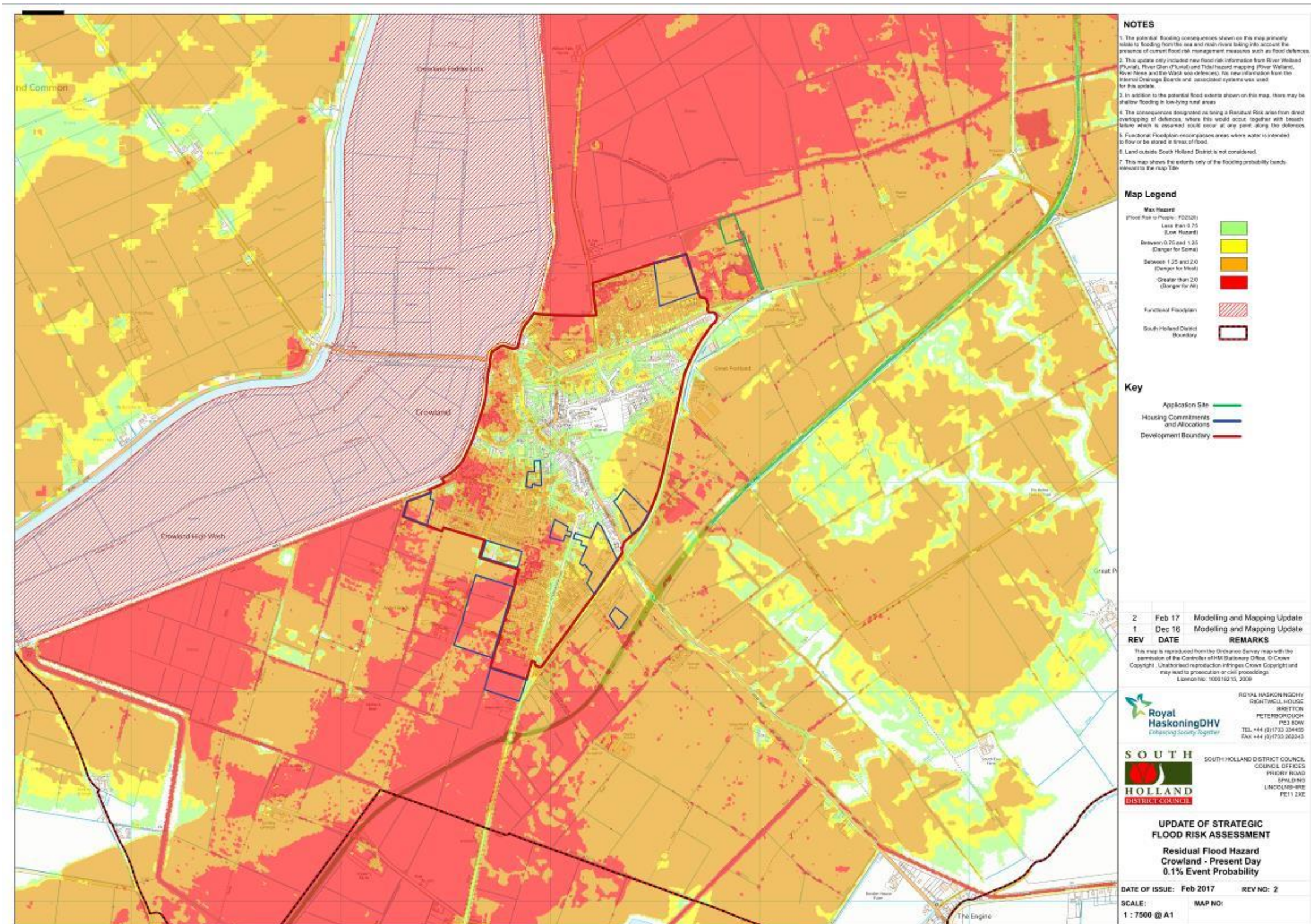
We believe that the provision of housing of this standard could help to raise awareness of the benefits of the technologies involved in their construction, and they could also form an exemplar development which may inspire others. The nature of the development, which would involve making the plots available to different parties, would help to maximise the exposure this technology would receive in terms of raising awareness amongst local people.

As these houses would significantly exceed building regulation requirements, they would also ensure that the proposed development would not generate a high level of carbon emissions through the operation of the houses. We have also noted above that the dwellings would generate on-site renewable energy, which could be used to power electric vehicles. In light of this, it is clear that the Council's contention within the refusal of planning permission H02-0868-17, that the development would be unacceptable due to its generation of carbon emissions is a spurious argument, which

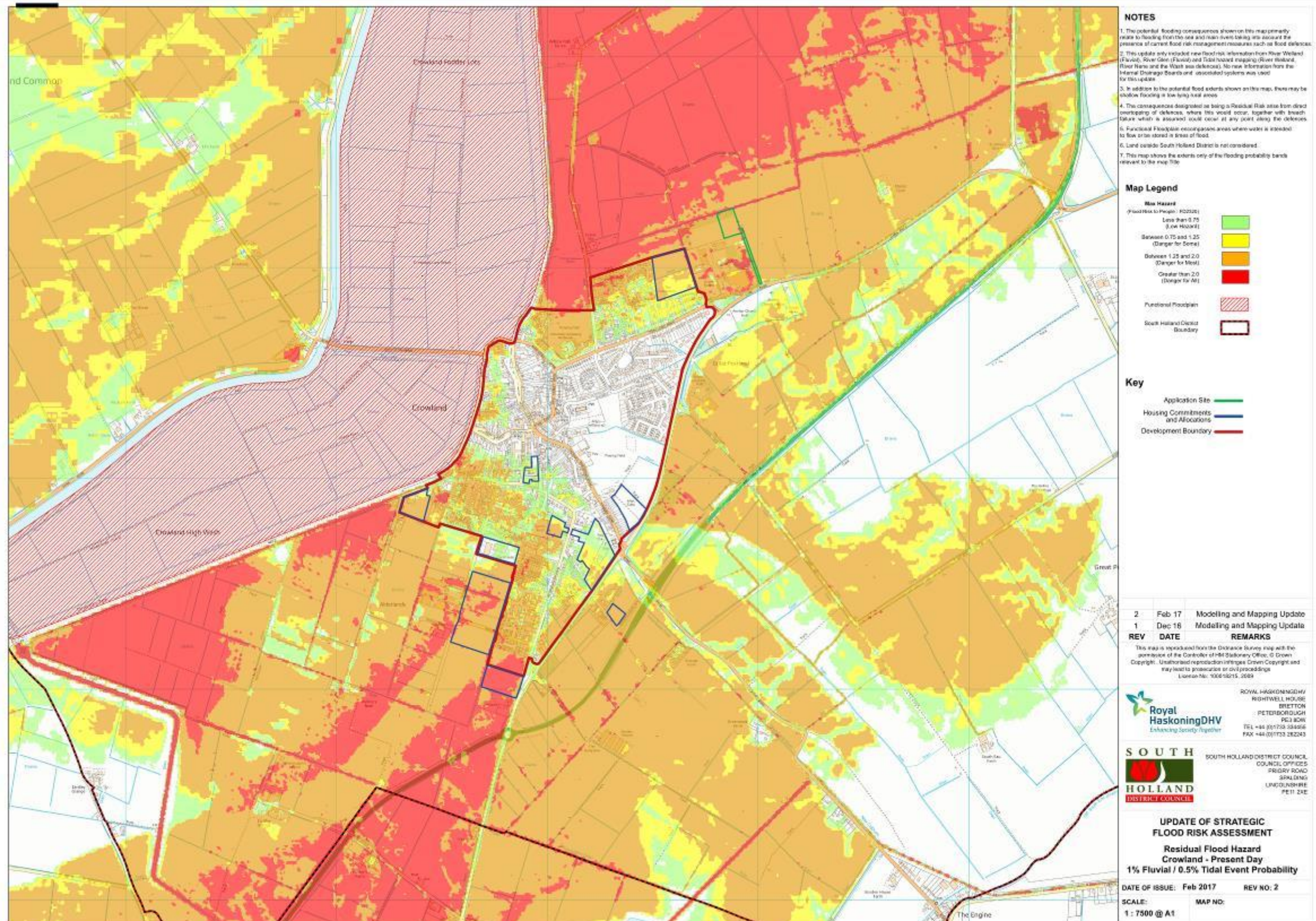


Extract from the Environment Agency's Flood Map for Planning, showing Crowland—Dark blue areas within Flood Zone 3

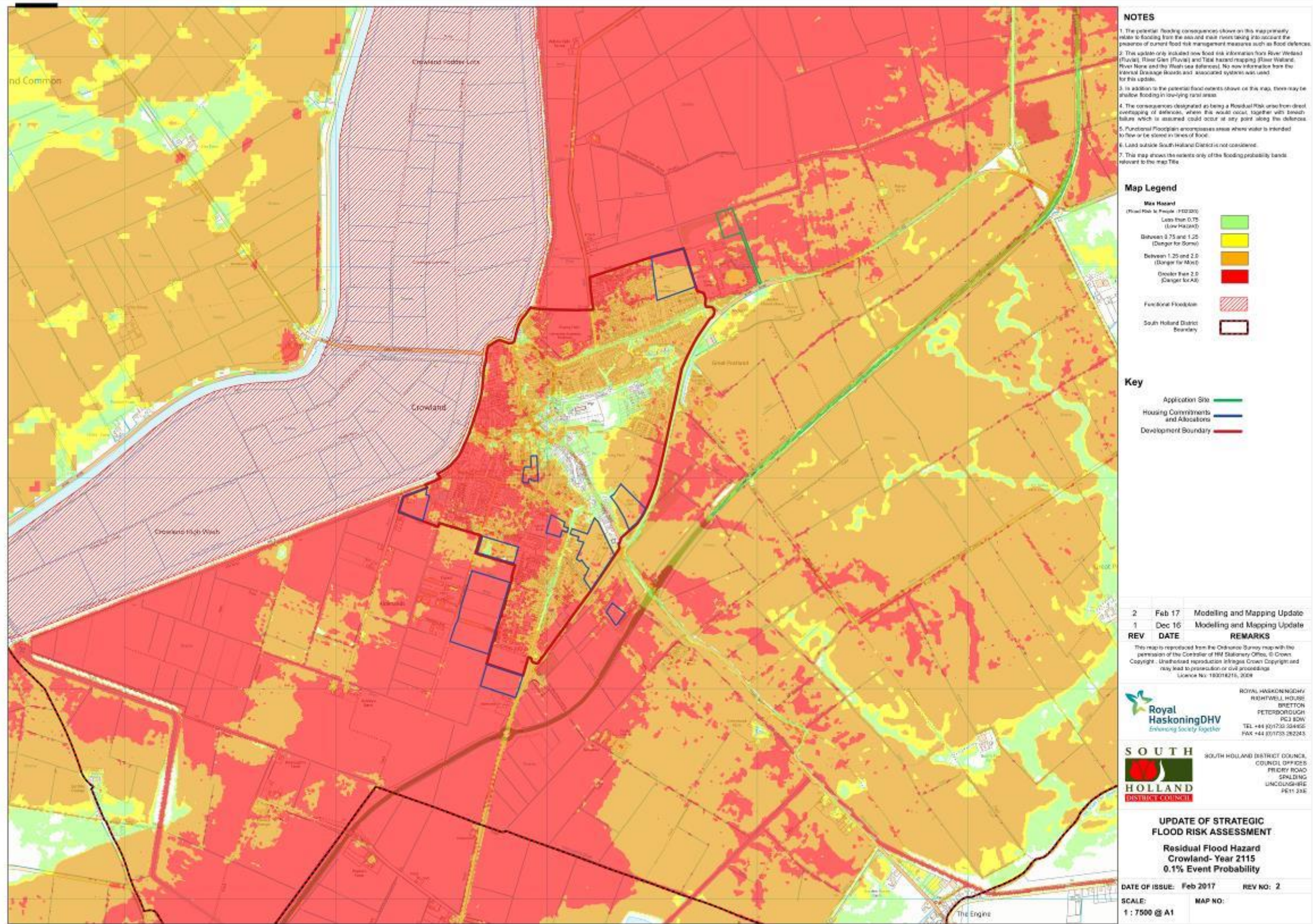
Red line settlement boundary, green outline application site, blue outline housing commitments



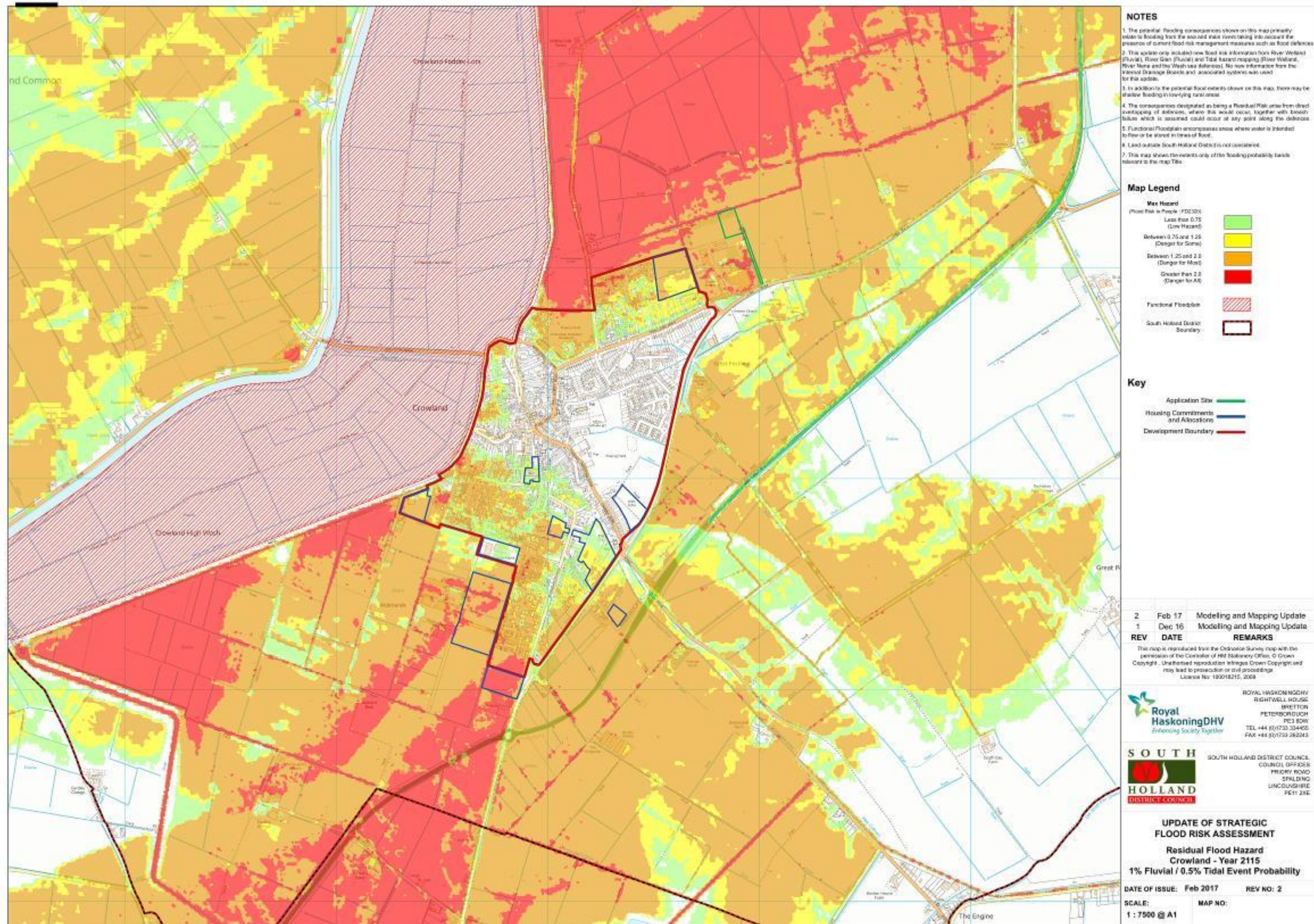
Extract from South Holland Strategic Flood Risk Assessment—Hazard Present Day 0.1% Event Probability



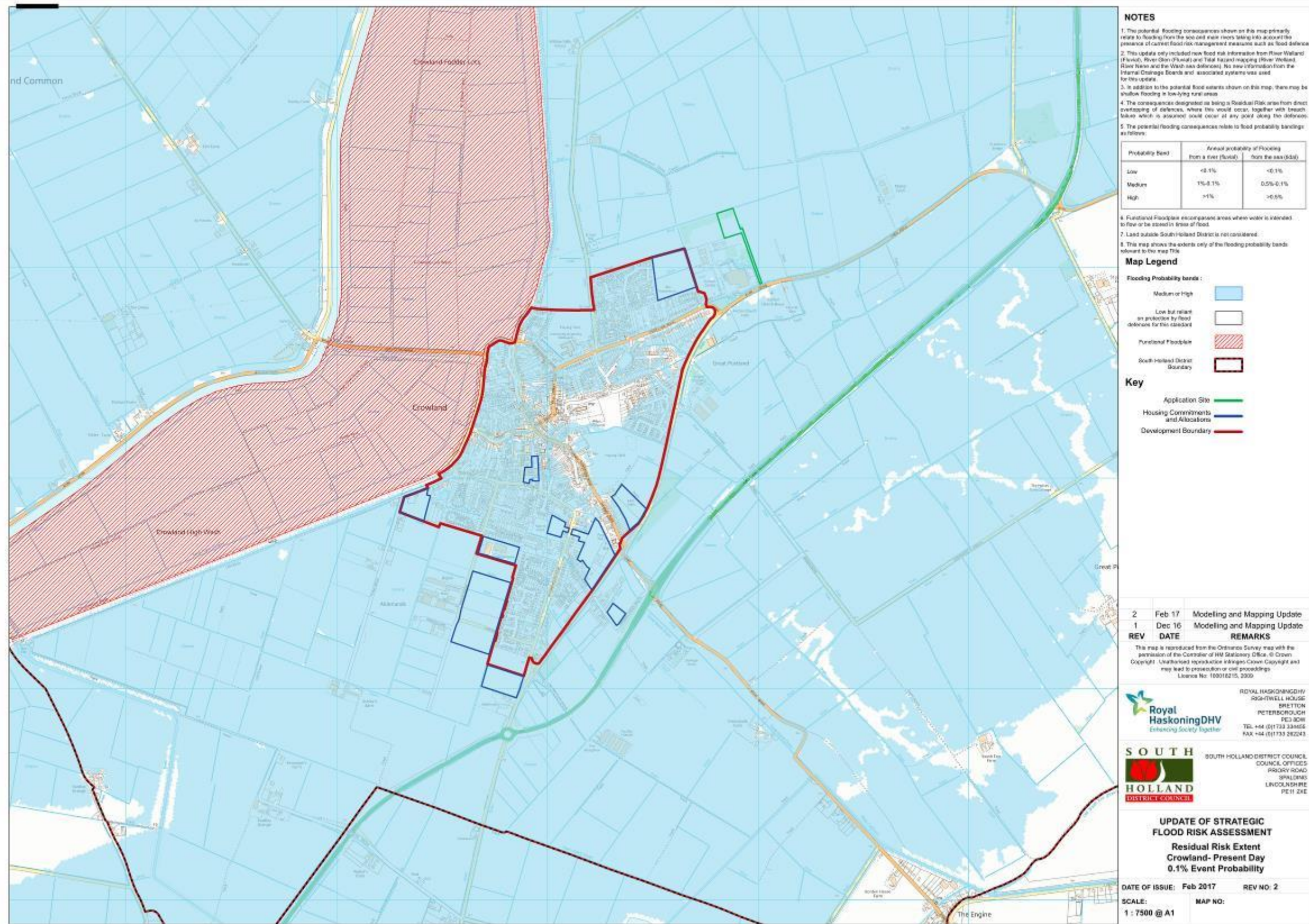
Extract from South Holland Strategic Flood Risk Assessment—Hazard Present Day, 1% Fluvial, 0.5% Tidal Event Probability



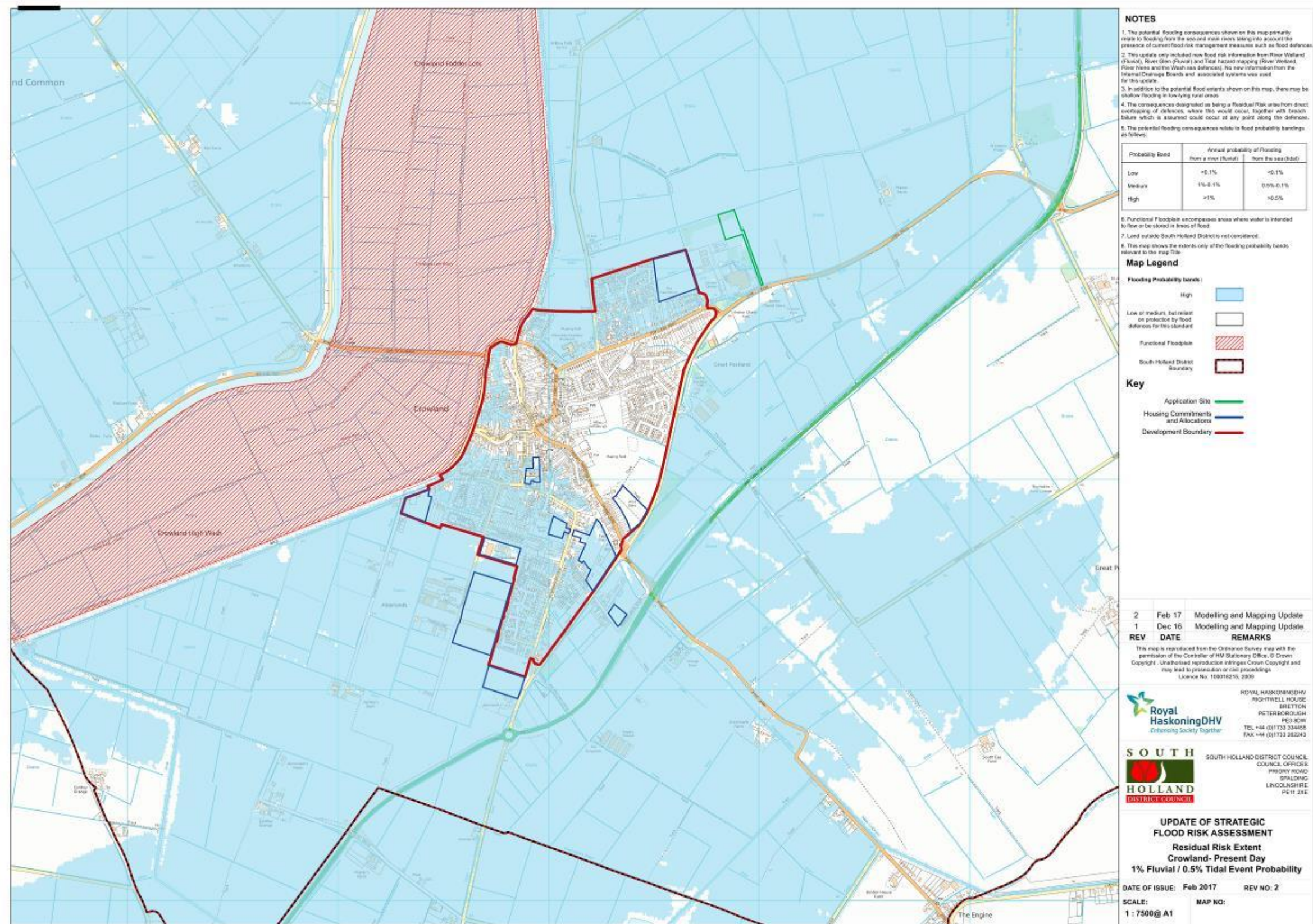
Extract from South Holland Strategic Flood Risk Assessment—Hazard 2115, 0.1% Event Probability



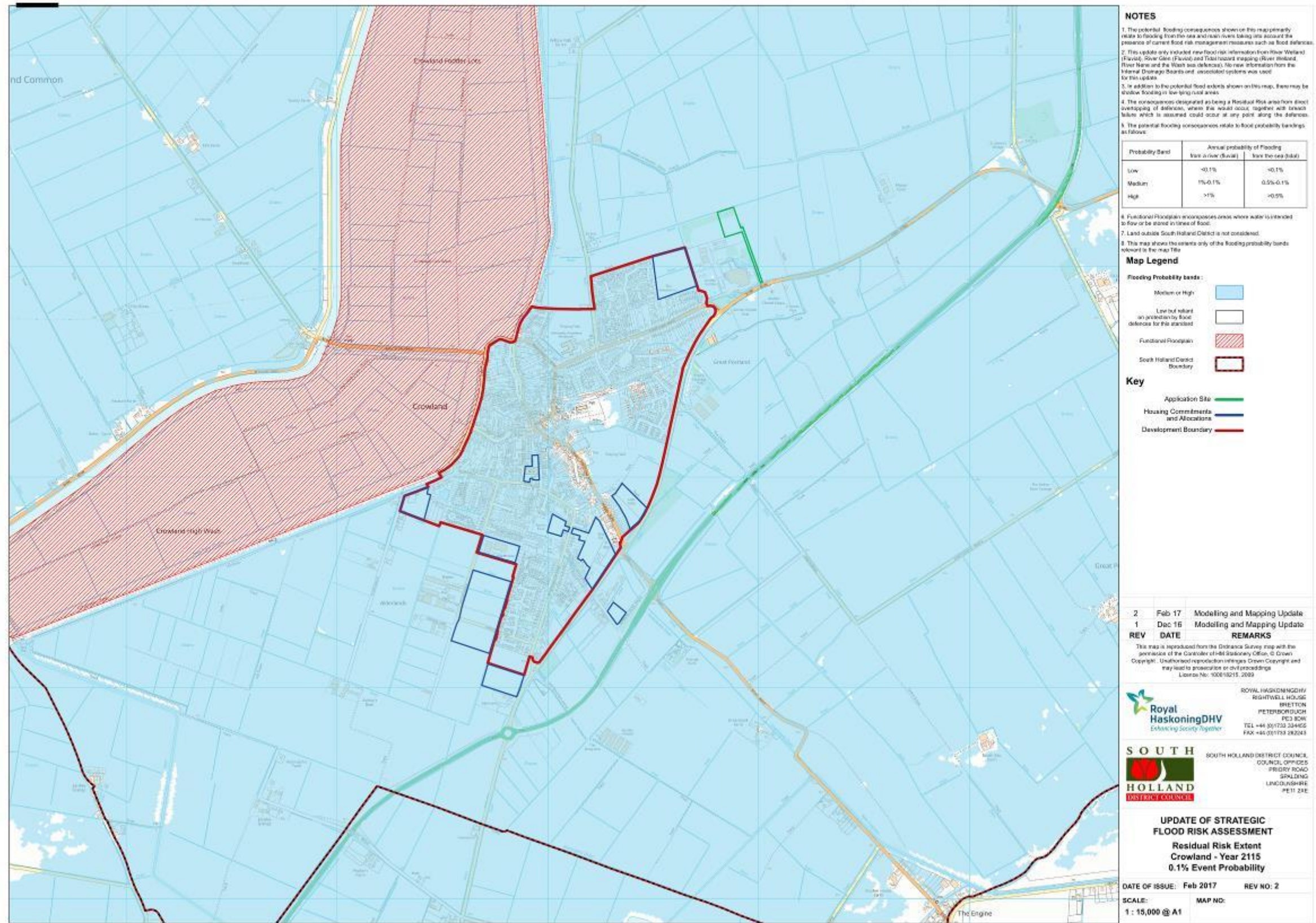
Extract from South Holland Strategic Flood Risk Assessment—Hazard 2115, 1% Fluvial, 0.5% Tidal Event Probability



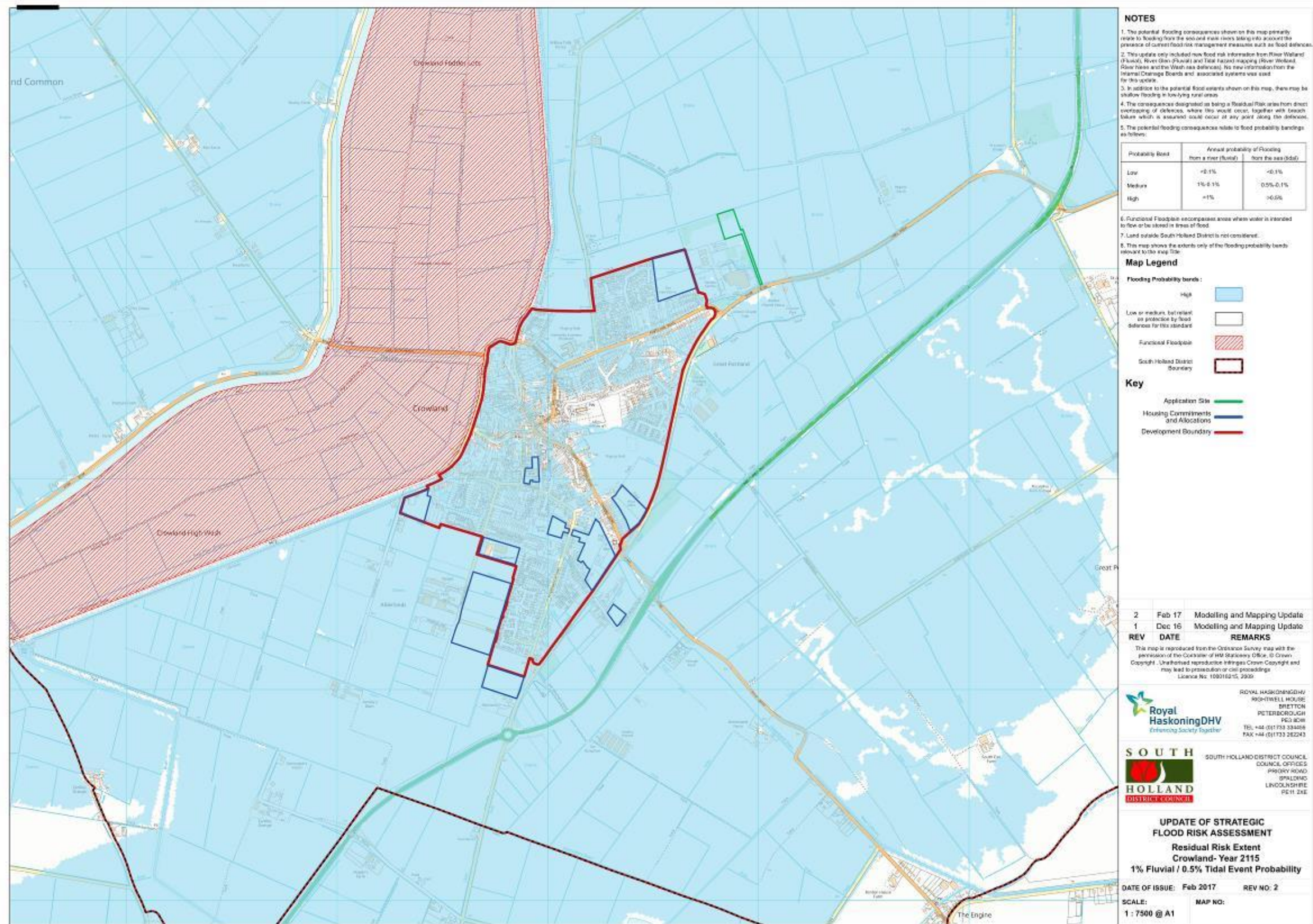
Extract from South Holland Strategic Flood Risk Assessment—Extent Present Day, 0.1% Event Probability



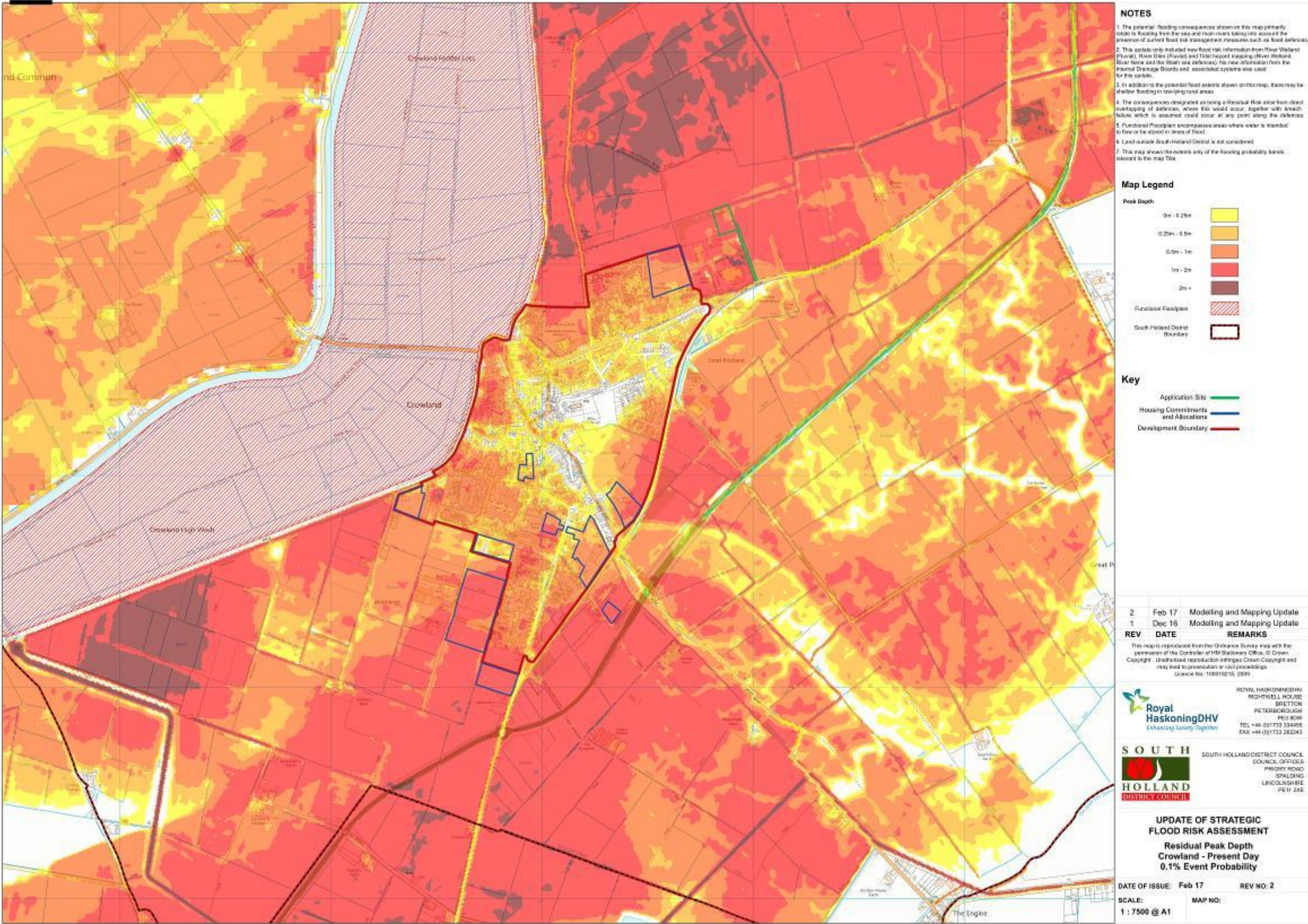
Extract from South Holland Strategic Flood Risk Assessment—Extent Present Day, 1% Fluvial, 0.5% Tidal Event Probability



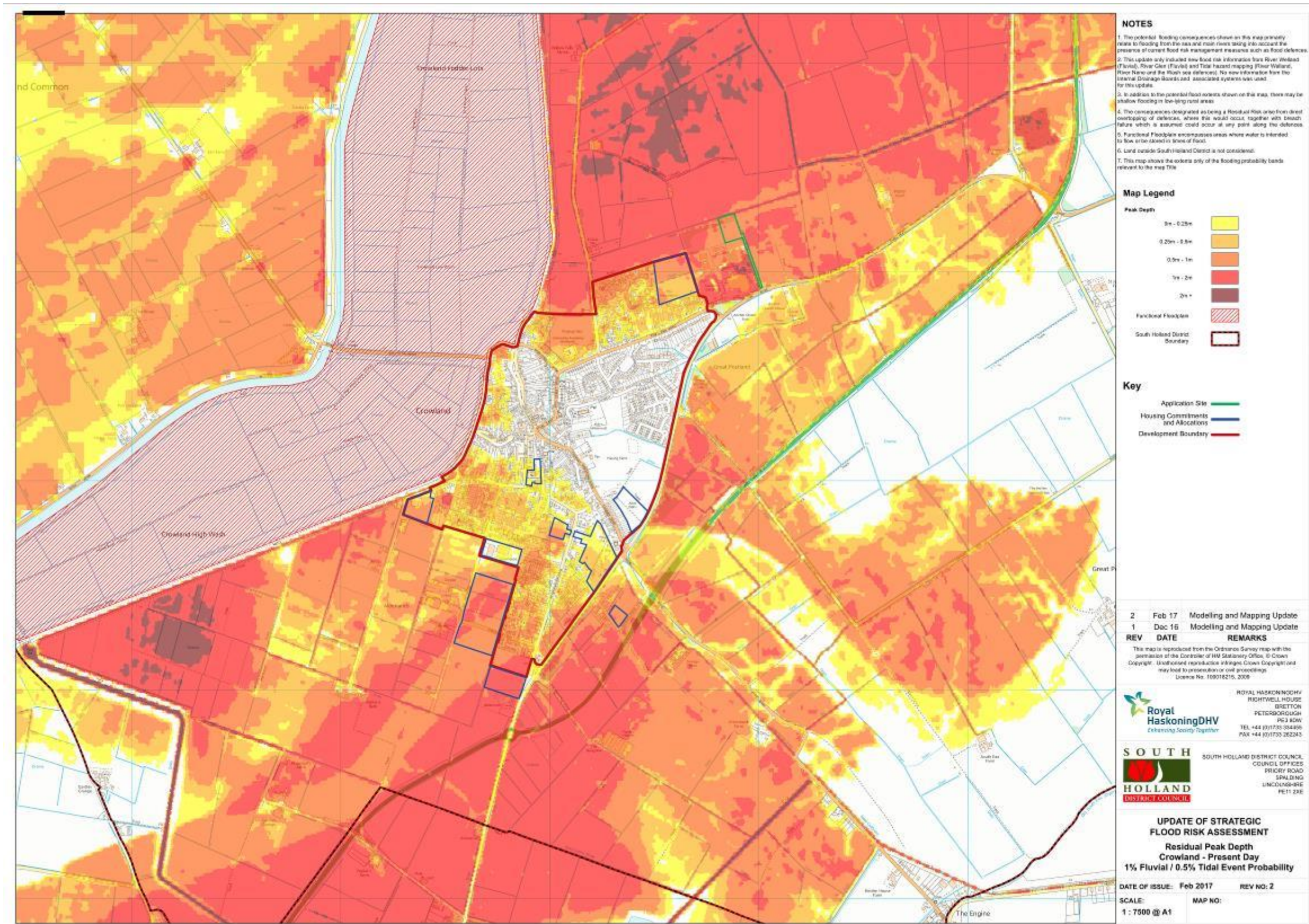
Extract from South Holland Strategic Flood Risk Assessment—Extent 2125, 0.1% Event Probability



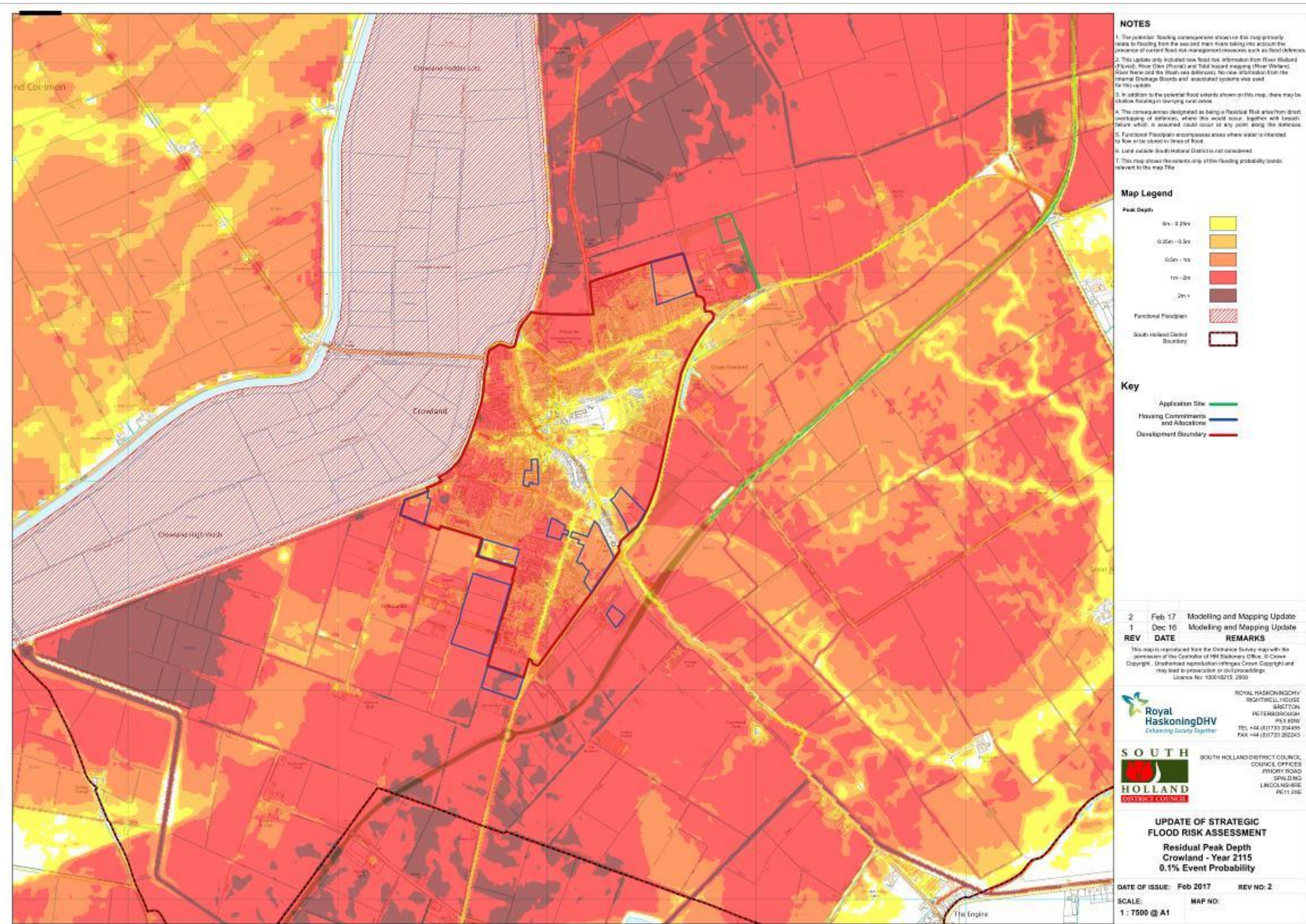
Extract from South Holland Strategic Flood Risk Assessment—Extent 2125, 1% Fluvial, 0.5% Tidal Event Probability



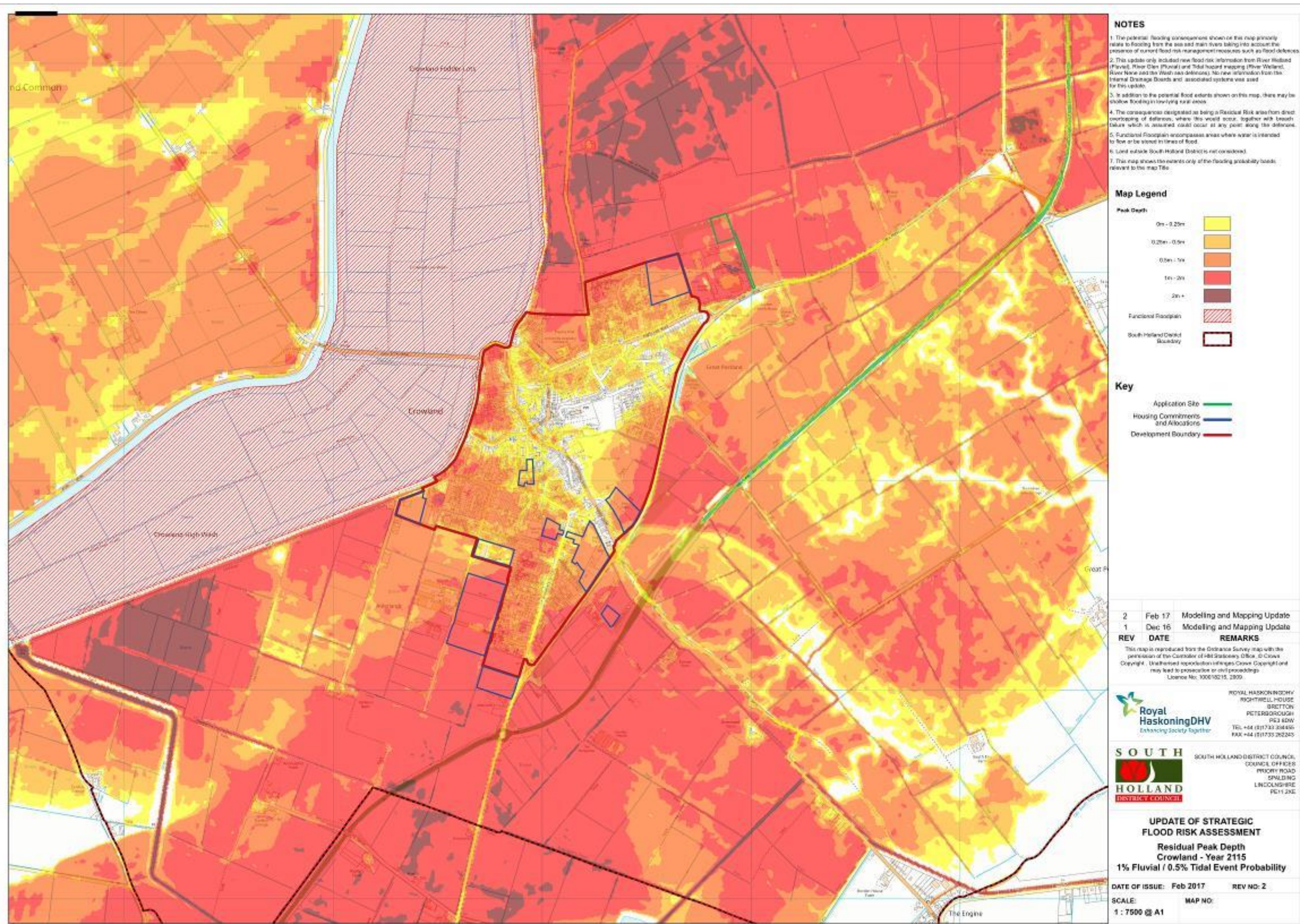
Extract from South Holland Strategic Flood Risk Assessment—Residual Peak Depth Present Day, 0.1% Event Probability



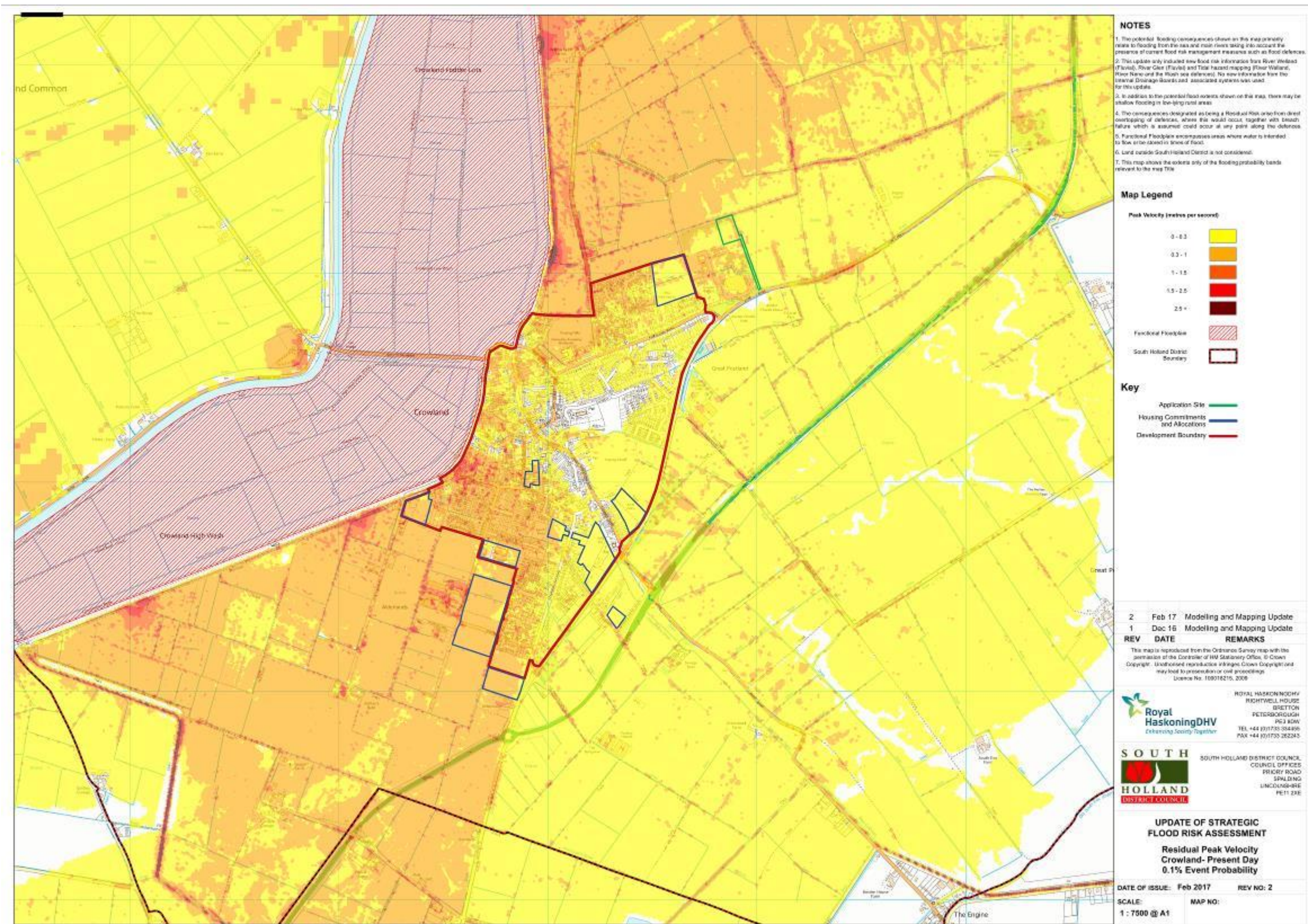
Extract from South Holland Strategic Flood Risk Assessment—Residual Peak Depth Present Day, 1% Fluvial, 0.5% Tidal Event Probability



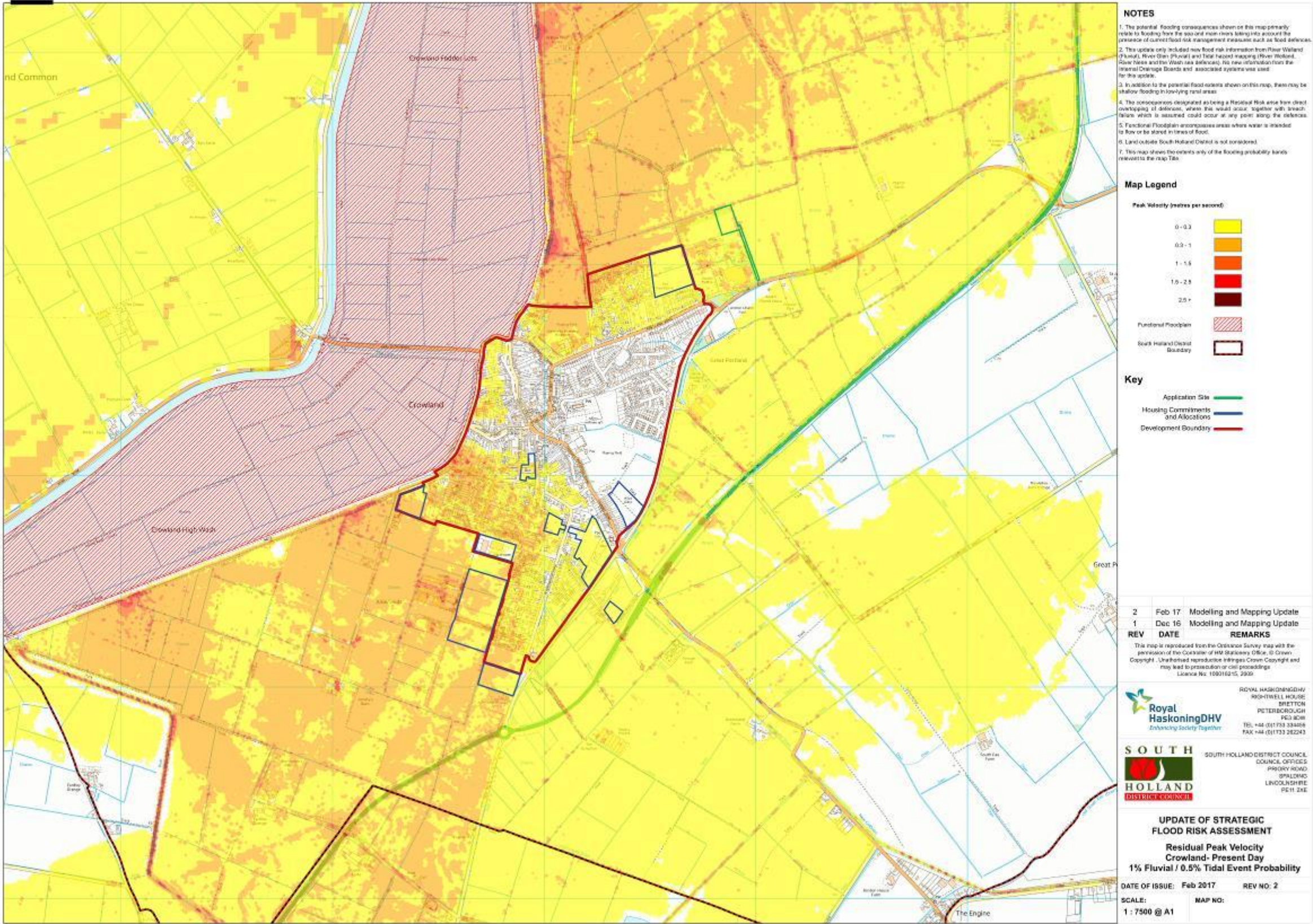
Extract from South Holland Strategic Flood Risk Assessment—Residual Peak Depth 2115, 0.1% Event Probability



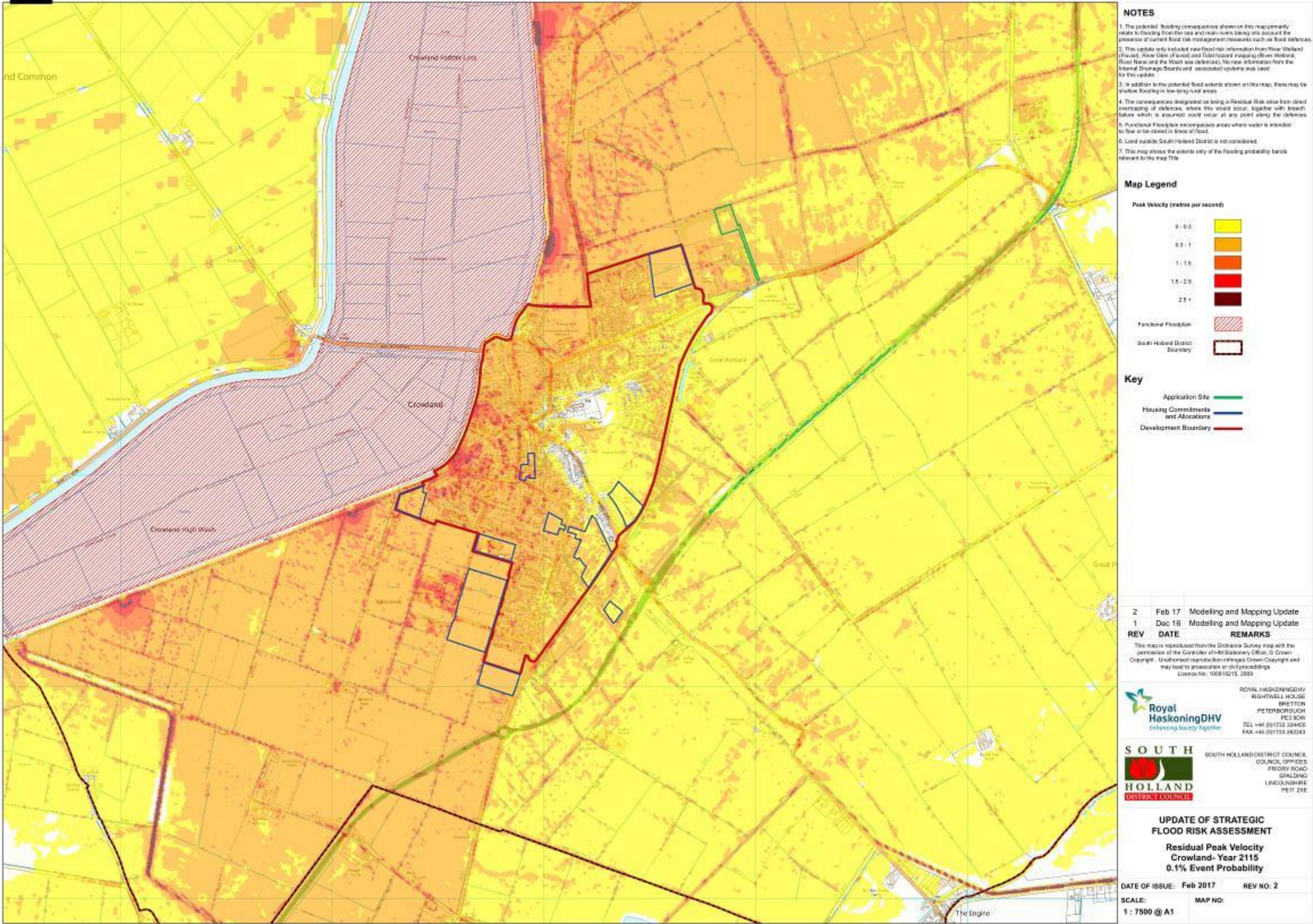
Extract from South Holland Strategic Flood Risk Assessment—Residual Peak Depth 2115, 1% Fluvial, 0.5% Tidal Event Probability



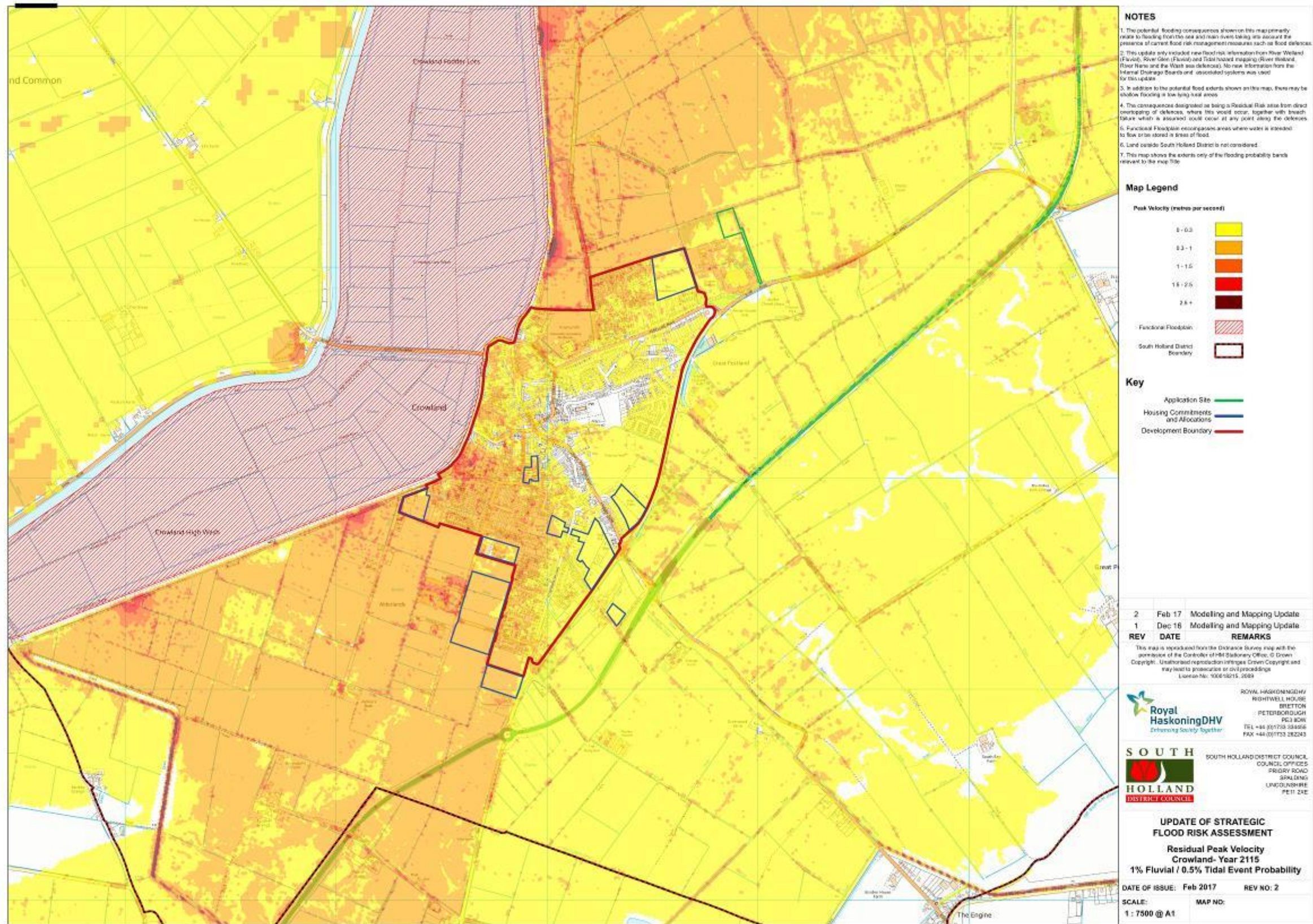
Extract from South Holland Strategic Flood Risk Assessment—Residual Peak Velocity Present Day, 0.1% Event Probability



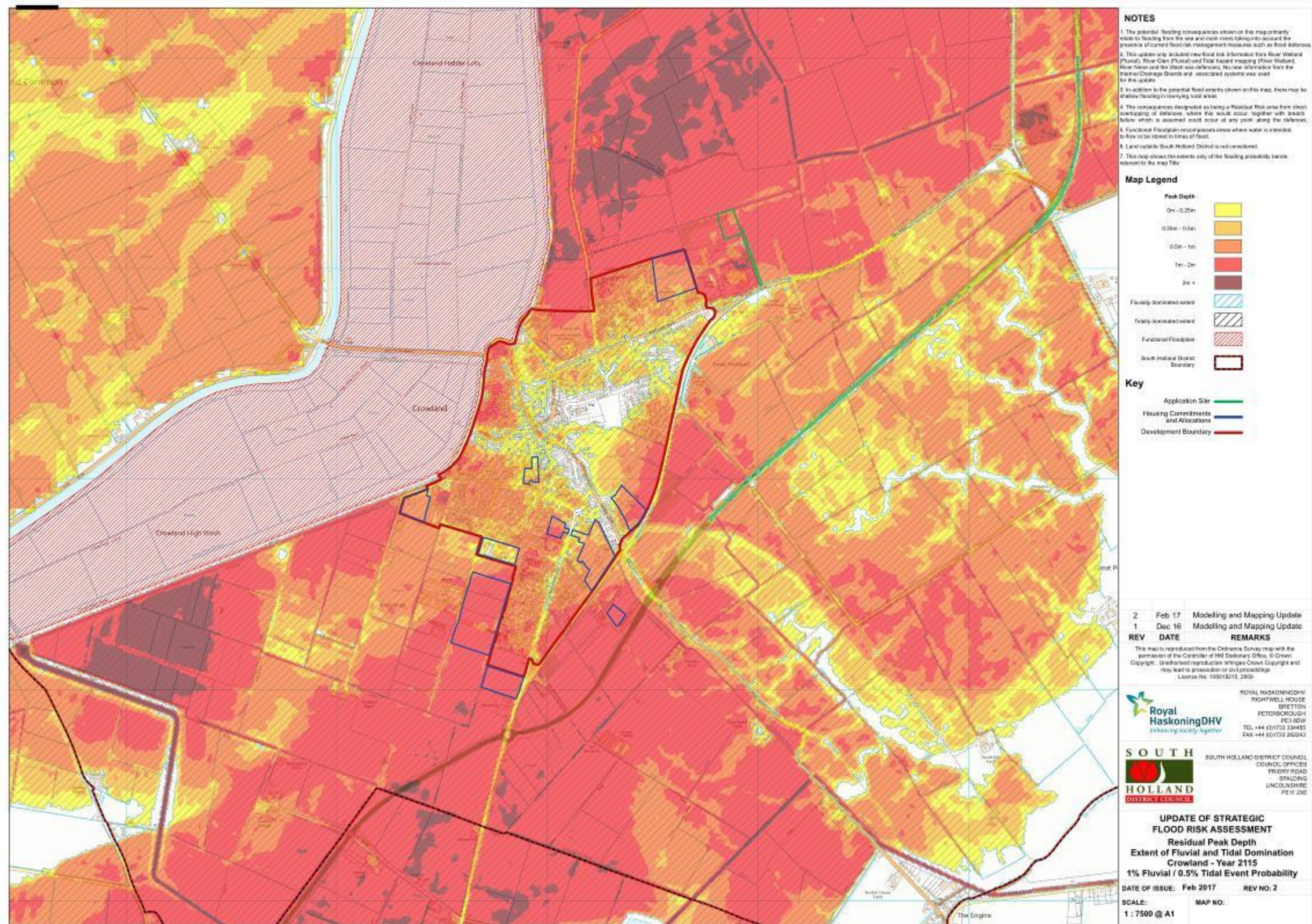
Extract from South Holland Strategic Flood Risk Assessment—Residual Peak Velocity Present Day, 1% Fluvial, 0.5% Tidal Event Probability



Extract from South Holland Strategic Flood Risk Assessment—Residual Peak Velocity 2115, 0.1% Event Probability



Extract from South Holland Strategic Flood Risk Assessment—Residual Peak Velocity 2115, 1% Fluvial, 0.5% Tidal Event Probability



Extract from South Holland Strategic Flood Risk Assessment—Residual Peak Velocity, Extent of Fluvial and Tidal Domination 2115, 1% Fluvial, 0.5% Tidal Event Probability

ignores the specific details proposed as part of this scheme.

The application site currently represents a poor habitat for wildlife, being a well maintained grassed area and wooded area with much of the surrounding area being used in association with the adjacent commercial business uses and highly managed agricultural fields. The addition of domestic garden land with kitchen gardens and the creation of significant wildlife habitats by using bird boxes and insect houses within the wooded area has the potential to improve the ecological value of the site significantly. Alongside the woodland area the site will also have a pond as part of the SuDS drainage system. This would deal with the surface water created on site and would also enhance biodiversity by providing a habitat to aquatic and semi-terrestrial species.

Further detailed information on the sustainability measures proposed within the homes is outlined within Section 6 of this report.

3.6 Social Sustainability

We have noted that there is a need, and a statutory duty, to provide land for custom and self-build housing, which is currently being ignored by the Council. The provision of this type of housing would be a clear and weighty social benefit which would weigh in favour of these application proposals.

The social objective of sustainable development, set out at paragraph 8 of the NPPF, requires planning to support **'strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations'**. If this ap-

plication were to be refused, the opportunity to provide for an identified element of housing need would be lost. This would be contrary to the Government's social objective.

Providing housing at a time of acute need, when affordability of homes continues to worsen is an important contribution to the social life of the community. It allows residents to access housing that is suitable and appropriate for their needs. It allows families to grow and continue to live locally, and employees to live a comfortable distance from their places of work.

This development will benefit future residents through its accessibility to local services, and to the main employment areas of Peterborough and Spalding. Residents will benefit from modern high-quality homes, with exceptional thermal efficiency, driving down the cost of their energy bills.

This development can be achieved with no unacceptable loss of amenity to the surrounding commercial businesses, and will provide a high level of amenity for future residents of the new scheme, as well as contributing to sustaining Crowland as a thriving local community.

3.7 Flood Risk

The application site is located within Environment Agency (EA) Flood Zone 3a—assessed as land at a high risk of flooding (having a 1 in 100 or greater annual probability of river flooding or a 1 in 200 greater annual probability of flooding from sea in any year). The requirement for a site specific Flood Risk Assessment is therefore triggered and a copy is enclosed within this application.

The Flood Risk Assessment (FRA) submitted with this application notes that the application site is not unique in lying within Flood Zone 3a, in accordance with the Environment Agency's Flood Map for Planning. The same is also true for the majority of areas outside of the historic core of Crowland.

This is illustrated in an extract from the Flood Map for Planning on the following page. The proposed allocations within the newly adopted Local Plan include land within Flood Zone 3a and recent planning approvals have included sites which are entirely within Flood Zone 3a. This suggests that through necessity the District accepts that to meet housing need within the District there will need to be development within Flood Zone 3a. It should also be noted that all the allocations within the Local Plan are for general housing and do not include any provision for self-build and custom-build homes. This suggests that in order for self-build and custom-build sites to come forward it is highly likely that they would be located in Flood Zone 3.

The Planning Practice Guidance (PPG) advises that the NPPF sets strict tests to protect people and property from river and sea flooding and, where these tests are not met, new development should not be allowed. The Framework advises that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. The aim of the Sequential Test is to steer development to land with the lowest probability of flooding and that the Strategic Flood Risk Assessment (SFRA) will provide the basis for applying the Sequential Test.

A comprehensive review of housing sites in the District has already been carried out as part of the Councils Strategic Housing Land Availability Assessment (April 2017) and through background work for the newly adopted *South East Lincolnshire Local Plan*. Therefore, if there were more suitable housing sites in Flood Zone 1 these would already have been identified and brought forward.

The *South East Lincolnshire Local Plan* identifies that much of the land within the Local Plan area is at significant risk of flooding and that this risk is likely to increase with Climate Change.

Policy 11 of the *South East Lincolnshire Local Plan* states that there is a need for 524 dwellings to be developed in Crowland over the plan period 2011-2036. The recently published SHLAA for Crowland (April 2017) assessed 39 sites in total. Of these sites, the Council concluded that 21 are 'developable'. Of the developable sites, 9 are in sequentially preferable locations in flood risk terms (i.e. located in Flood Zone 1 or 2). Together, these sites could deliver approximately 188 dwellings. This equates to only 36% of the housing requirement. The remaining 312 dwellings must therefore be developed within Flood Zone 3a. On that basis the Council have accepted that sites within Flood Zone 3a must be developed to enable the delivery of 524 dwellings over the plan period in Crowland. It should also be noted that there are no sites identified in the Local Plan for self-build and custom-build homes in Crowland or in fact the District. The application site is currently owned by the applicants who wish to build at least two of the homes for themselves. As they own this land in Crowland it is entirely reasonable that they would want to self-build on the application site.

With regard to specific planning applications, where the sequential test has not been undertaken in relation to Local Plan allocation, the PPG directs that it should be applied in relation to the catchment area for the type of development proposed. It gives the example of **'the need for affordable housing within a town centre, or specific area identified for regeneration'**, noting that **'where there are large areas in Flood Zone 2 and 3....and development is needed in those areas to sustain the existing community, sites outside them are unlikely to provide reasonable alternatives'**. This example relates to a specific type of housing, which Government policy requires to be delivered in order to meet the needs of local communities. In this sense, affordable housing is similar to custom and self-build housing, and we believe a similar approach should be taken in the application of the sequential test.

Recent guidance from the Environment Agency has confirmed that where sites are within Flood Zone 3a (EA Mapping) and no sequentially preferable sites are available in Flood Zone 1 & 2 that the District Authority should accept that some development must be accepted, but they then should revert to the latest flood mapping within the South Holland Strategic Flood Assessment to assess the sites true probability of flooding. The site specific Flood Risk Assessment considers the site and flood risk in some detail. It concludes that the sequential test is passed and that the exception test should then be applied.

NPPF Paragraphs 158 to 161 set out the basis for the sequential and exceptions tests as follows:

158. The aim of the sequential test is to steer new develop-

ment to areas with the lowest risk of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding'.

159. If it is not possible for development to be located in zones with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in national planning guidance.

160. The application of the exception test should be informed by a strategic or site-specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. For the exception test to be passed it should be demonstrated that:

- a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and**
- b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.**

161. Both elements of the exception test should be satisfied for development to be allocated or permitted.

As we have noted there are two parts to the exception test.

The first is that the proposed development must **‘provide wider sustainability benefits to the community which outweigh the flood risk’**. The proposed development would provide a number of clear benefits to the local community. These are set out earlier in this report, but we briefly note here that they include the only means by which custom and self-build housing is currently proposed within the District, to meet an identified need. They also include the provision of a high-quality development, which would also provide an exemplar of sustainable building techniques. It is envisaged that this could be a very influential development, introducing concepts of both custom and self-build housing and also high environmental specification housing to the local area.

The proposals are designed to directly address the Exception Test with the design of the buildings. All homes on the site will have all habitable rooms elevated a minimum of 2.0m above the existing ground level (0.7m above the minimum requirements of the site specific FRA) exceeding the maximum potential flood level and therefore ensuring that the property and its occupants will be safe for the 100 year life of the development. Significant sustainability benefits would also be provided by the proposed development for Crowland and the wider District. The homes proposed would be highly energy efficient, sustainable homes incorporating high quality architecture similar to a ‘Paragraph 79’ home. The scheme would also make a significant contribution to housing need and in particular for self-builders looking to create their home within the South Holland District. There are currently no sites specifically aimed at self-builders within the District and this is borne out by the current Self-build Register which contains 42 applicants. This approach to development also brings socio economic benefits by providing executive homes allowing existing residents to stay within the District and improve their lifestyle as well as encouraging new residents into the District. It is therefore felt that as there is no

other sites that offer these benefits within the District the benefits of the proposals are significant and therefore this part of the Exception Test is passed.

The FRA which accompanies this application also demonstrates that the proposed development would be both safe for its lifetime, and that it would not increase the risk of flooding elsewhere. As such it would comply with the second part of the exceptions test.

3.8 Summary of Material Planning Considerations

Whilst it is accepted that the Council can currently demonstrate a 5 year land supply of housing, this should be seen in the context of many years of under delivery. It should also be noted that 5 year land supply figures are minimum figures and do not prevent the Council granting permission for more homes than the 5 year land supply figure.

Self/ Custom Build homes are not currently catered for within the South Holland District and the Council has confirmed that 42 people are currently seeking self-build plots and that the Council have not allocated any specific land for self-build plots. They also confirmed that they do not monitor the provision of self-build plots within the district. This is clearly contrary to The Self-Build and Custom Housebuilding Act 2015, and as such the Council are failing as duty holders.

The type and tenure proposed of the housing also adds to the variety of housing stock within the District and meets a clearly identified need.

Crowland is a highly sustainable location for development being a Main Service Centre within the newly adopted Local Plan. The site itself is well served with pedestrian and cycle access as well as a drive for the use by conventional and electric vehicles. Each home will be provided with electric car charging points with electricity generated by photovoltaic modules and stored in batteries on site.

Alongside highly sustainable homes will also enhance biodiversity on site by taking advantage of the existing woodland area and by creating new habitats with the pond at the centre of the site.

It is accepted that the site is within Flood Zone 3a but that could be said of the majority of the South Holland District. The site specific Flood Risk Assessment has demonstrated that the risk of flooding on the site is no worse than sites currently receiving planning permission or within the Local Plan as allocations. That suggests that the Council believes development within Crowland is acceptable and that there are not sequentially preferable sites within the settlement.

4.0 The Development in Context

4.1 Character Assessment

Crowland is a typical fenland settlement, located along the A16 between Spalding and the city of Peterborough. Crowland is identified in the South East Lincolnshire Local Plan 2019 as a Main Service Centre and benefits from a range of services, employment opportunities and acts as a focal point for the surrounding rural area.

The site comprises of approximately 1.58 hectares of land on the north-eastern edge of Crowland. To the south lies the former Crowland Garden Centre (now closed) with agricultural fields to the north and east as well as Crowland Caravans to the west.

The application site is currently grassed land that is used for the demonstration of camping and caravanning equipment. It benefits from an existing cycle and pedestrian connection to Postland Road. The site is located within a relatively flat landscape typical of a Fenland town but does benefit from mature landscaping which largely screen the site from public view.

The site lies in close proximity to the settlement centre and is within 17 minutes walking distance of its centre and associated amenities.



Application Site and Surrounding Areas

4.2 Landscape Assessment

The purpose of this Landscape Assessment is to assess the existing landscape characteristics of the site, key landscape elements within and around the site together with the potential impacts of the proposed development.

The Fens Landscape Character

Volume 6 of the Countryside Character produced by the Countryside Agency describes 'The Fens' as:

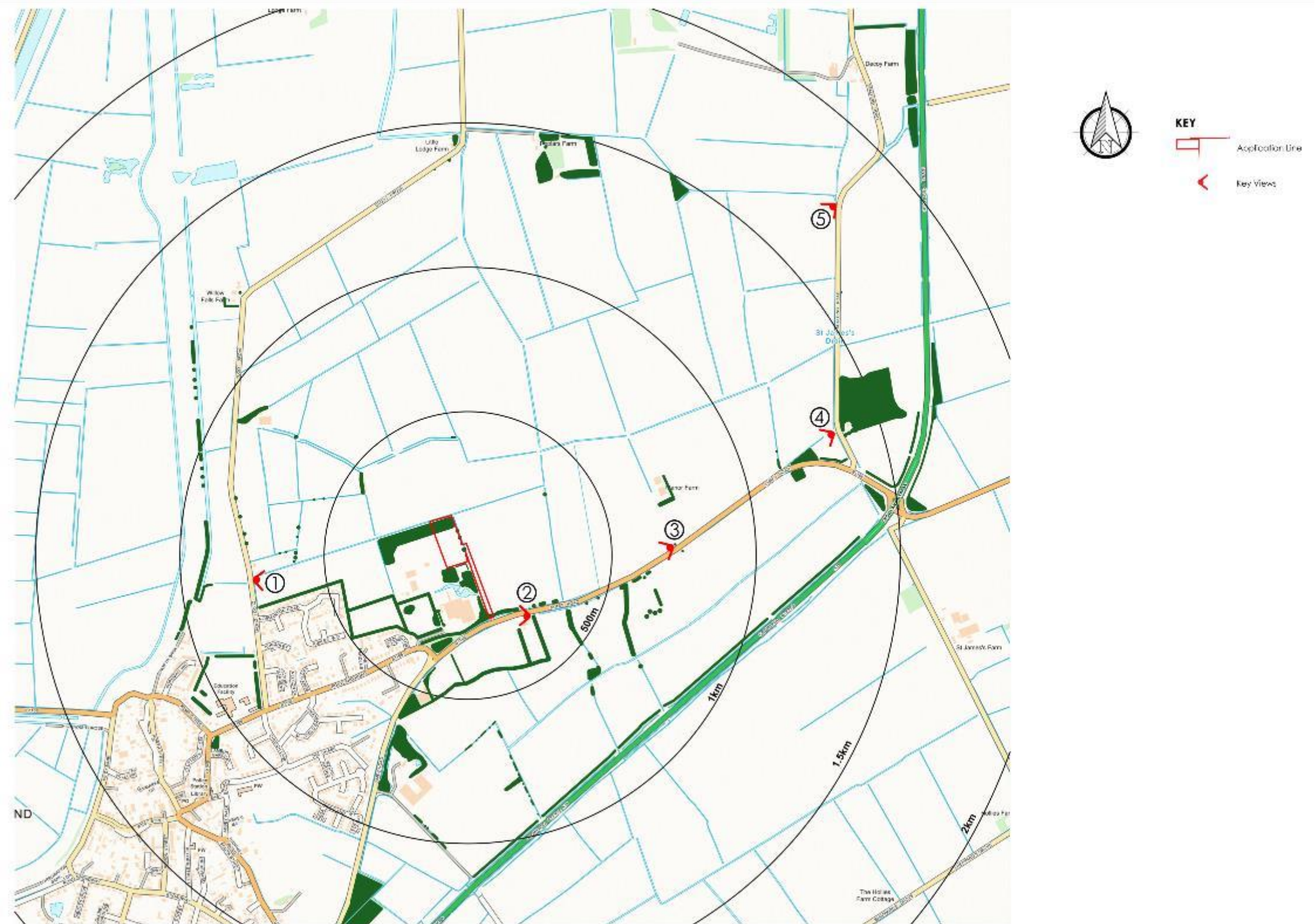
'Sky, soil and water combine in geometric patterns to give The Fens its distinct and cohesive character. Dramatic cloudspaces and huge skies dominate the extensive views that the flat low-lying land of the area affords. The tilling of rich and varied soils and the harvesting of abundant crops are often the only activities to be seen in an empty, open landscape, occasionally punctuated by an isolated farmstead or a cluster of trees. The embanked rivers and drains that have transformed this area from its flooded origins provide the only elevation. Around the Wash lies an arc of more ancient character, irregular medieval field patterns and much denser settlement, clinging to the high ground which once stood out of the marsh. Major buildings such as Ely Cathedral and the 'Boston Stump' can be seen for miles around.'

Landscape Character In and Around the Site

The site itself takes access from James Road with its main extents being to the north of the former Crowland Garden Centre. Mature trees and landscaping are apparent to the south, east and north of the former garden centre and this landscaping forms a boundary between the built up area of Crowland and the adjacent open fields. An earth bund is apparent to the south of the site within the garden centre curtilage. A mature tree belt is apparent to the north of the site. To the east the site is bounded by a land drain with

sporadic bushes and trees. There is no defined site boundary to the west but the backdrop of this vista is of a tree belt which defines the boundary of Crowland Caravans and Camping and the adjacent agricultural fields. It should be noted that these agricultural fields between Normanton Road and Crowland Caravans and Camping are proposed as an allocation within the newly adopted Local Plan.

As part of the assessment of the site key features were assessed and where possible existing landscaping retained. Key vistas of the site were assessed from surrounding public areas and those details are outlined on the following pages.



Map Showing Key Vistas of the Site from Surrounding Public Areas



Site as Existing



Site as Proposed

Image 1—View from Clout Drove



Site as Existing



Site as Proposed

Image 2—View from James Road



Site as Existing

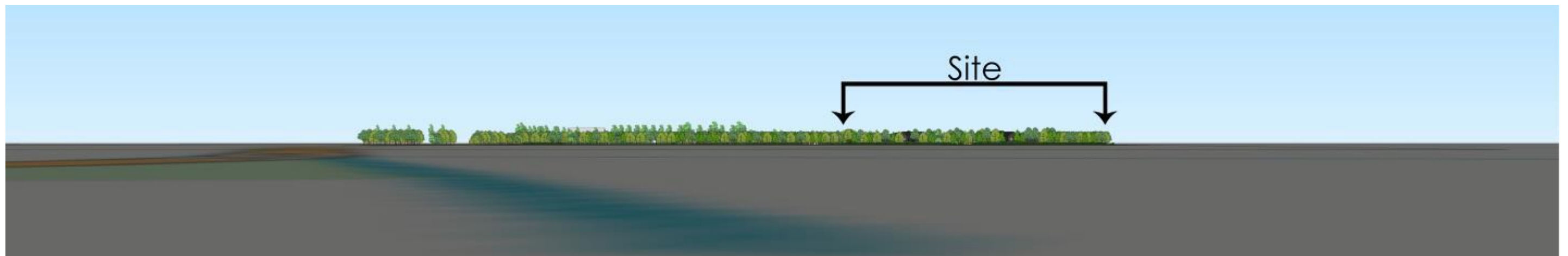


Site as Proposed

Image 3—View from James Road



Site as Existing

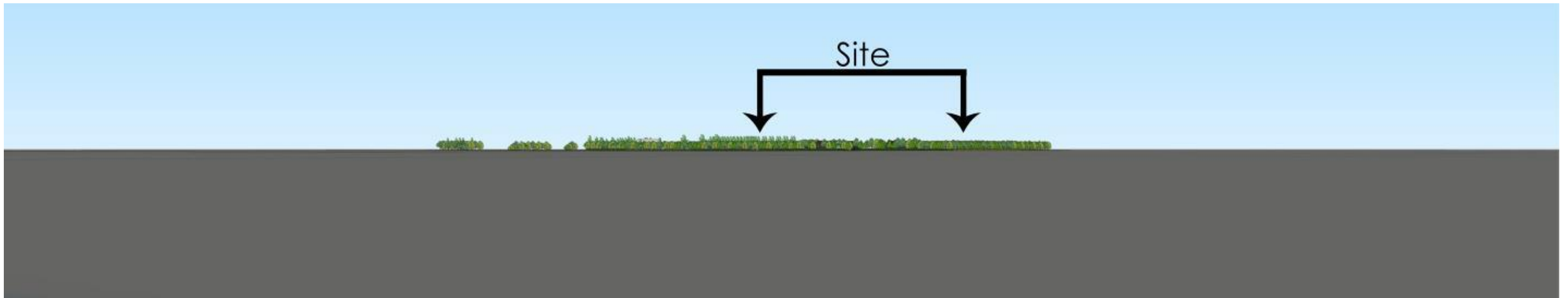


Site as Proposed

Image 4—View from Spalding Road



Site as Existing



Site as Proposed

Image 5—View from Spalding Road



Site as Existing



Site as Proposed

Image 6—View from James Road of new access track/ road

4.3 Physical Influence

Currently the site is a highly managed parcel of land to the rear of the former Crowland Garden Centre. Most of the site is laid to grass with a mature tree belt to the north. An open watercourse bounds the site on the eastern boundary. There is existing mature landscaping on the southern boundary of the site and further grass fields to the west.

At an early stage it was felt that the design of the scheme should be influenced by both the Crowland architectural vernacular where possible and the sites position within the settlement. The scheme has therefore been designed in a modern context with vernacular architecture which responds directly to the site constraints and end use of the homes. The design principles incorporated are intended to provide a modern sustainable housing scheme that seeks to create its own sense of place but also deals with flood risk issues and the land availability problems faced by self builders.

The site presents few constraints to development. The topography of the site is comparatively flat, with mature perimeter landscape features. The two main key constraints to the site are the perceived flood risk associated with the site and the sites location on the edge of the settlement from a visual and sustainability point of view.

These constraints have shaped the proposals and demonstrate that it is possible to have a sustainable flood resistant modern home that integrates well within the fenland landscape.



View into the site from the south-west



View of adjacent landscaped bund to the south-east of the site



View into the site from the north-east adjacent to IDB drain



View of wooded area and adjacent landscaped bund

4.4 Achieving Sustainable Development

A clear driver of the National Planning Policy Framework (NPPF) in relation to new housing is to contribute to the achievement of sustainable development. The NPPF goes on to confirm that there are three overarching objectives in achieving sustainable development which are:

- an economic objective;
- a social objective;
- an environmental objective.

So that sustainable development is pursued in a positive way, at the heart of the Framework is a **presumption in favour of sustainable development** (paragraph 11).

The following sections of this report seek to demonstrate that this proposal meets the objective of the NPPF and is sustainable development.

4.5 Economic Objective

The NPPF seeks to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types, and right size is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.

South Holland District Council do not currently have any sites specifically allocated for self-build homes within the adopted Local Plan

These proposals accord with the NPPF in that the scheme provides new self-build/ custom build homes, contributing to housing supply and in particular the supply of a self-build plot ensuring that the right type of land in the right places is

available.

The proposals also aim to provide a mechanism for local people to remain in Crowland but opt for a less 'mass developer' approach to living by providing a modest site of self build plots which can be developed into a high quality housing scheme.

A good example of this approach is the recently approved 'Paragraph 55' home (H02-0968-15) off Plank Drove which is currently under construction. This home was designed as an exemplar home for an existing Crowland resident that sought a lifestyle and home that could not be provided by the mass developer housing being currently constructed in Crowland. The planning permission granted by the Planning Committee in 2015 enabled the resident and his family to remain in Crowland. Maintaining his local business and allowing his family to continue to contribute to the South Holland District.

4.5 Social Objective

Paragraph 8b of the NPPF states:

'The social objective to sustainable development is to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.'

The proposals directly respond to these requirements by providing a self-build home of high architectural quality within the South Holland District which is not currently available. Furthermore the Council do not currently allocate any land specifically for self-build homes within the

current Local Plan.

The Self-Build and Custom Housebuilding Act 2015, as amended by the Housing and Planning Act 2016, requires local authorities, including district councils, to keep a register of people who are seeking land to construct their own self-build homes. The Act also contains a **'duty'**, which requires local planning authorities to grant planning permission for sufficient plots for self builders to meet the level of demand. This is established by the number of people registering for plots, and the level of demand in each 12-month period must be met within the following 3 years.

The Councils progress with complying with this duty is therefore highly relevant to this planning application. We requested that the Council inform us of the number of people on the custom and self-build register within South Holland District, and also the Councils progress in identifying available plots for these people. The Council confirmed that there are currently 42 people on the register, and that **'the council does not monitor custom and self-build plots available for sale in the district.'** This is a startling admission—the Council are very clearly failing to pay any regard to fulfilling its duty.

We believe that the Councils failure to meet, or even consider, its duty to provide plots for self-builders is highly material to this planning application, as set out in national policy guidance. It is clearly not a matter to which the Council have given any great consideration. It is also clearly not something which the Council will play any part in addressing in the near future. In this context, it is necessary for the market to step in to provide land for this type of housing.

4.6 Environmental Objective

Contributing, protecting and enhancing the natural, built and historic environment is a key environmental objective of the

NPPF. Alongside this making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change including moving to a low carbon economy are key objectives.

The proposed scheme makes better use of land by creating a family homes on underutilised land. It will also improve biodiversity by introducing new plant species, new insect habitats and a water habitat on the site. In responding to climate change the new homes will also be designed to be **A-Rated** and will be generating and storing its own power as well as being designed to minimise energy use.

5.0 Proposed Development

5.1 Use

The development will be residential self/ custom build homes.

5.2 Amount

An illustrative Site Layout accompanies this application which demonstrates that up to 6 new homes could be provided on the site. The proposals have been prepared on the basis of providing an appropriate density with due regard to the character, density and appearance of the surrounding development. The proposals seeks to make good use of the land by proposing 6 houses on the site giving a density of 4 Dwellings/ hectare, appropriate for this type of site on the edge of the settlement.

5.3 Layout

The proposed layout of the site is illustrative at this stage but does propose a cul-de-sac type arrangement similar to the surrounding existing developments along Postland Road and Cloot Drove. This approach to the layout offers the opportunity for large plots which in turn stimulates the opportunity for a high quality development.

5.4 Scale

The proposals consist of up to 6 new homes which could be either 2 or 2.5 storey in height.

5.5 Landscaping

Where possible all existing landscape features will be retained. The existing woodland area to the north of the site will be retained and maintained by a Management Company in perpetuity.

A significant landscaping belt is proposed to the eastern boundary of the site to soften the new buildings and to



Extract From Site Layout

Reinforce this boundary which is currently relatively clear providing views of the commercial buildings further to the west.



Existing Elevation from Adjacent Field



Proposed Elevation from Adjacent Field

5.6 Amenity Space

Each home is provided with private amenity space for socialising commensurate with their use as family homes.

The new homes will be provided with a significant garden which will allow for general amenity space, biodiversity improvements and to allow for home grown fruit and vegetables.

5.7 Appearance

The design philosophy underpinning the proposals aims to ensure that the development has a clear affinity with the sites location. Analysis of the design and the design principles underpinning the proposals is included within the Design Principles and Design Code document.

In general terms though the proposals incorporate a Design Code document which emphasises the need for the new homes to reflect the sites proximity to commercial and agricultural buildings as well as the general vernacular architecture of Crowland.

5.8 Access

Vehicular access to the development is by way of a private road off James Road. It is proposed that this road is constructed to be acceptable for use by cars, emergency and refuse vehicles. It will however be unusual in that it will be designed to look like a farm access track, similar to existing tracks in and around Crowland.



Existing track off James Road approximately 500m to the east of the site



Existing track off Clout Drove approximately 750m to the north-east of the site



Existing road off James Road approximately 750m to the east of the site

Within the previous submission it was asserted that the access road would be an incongruous feature within the area and provide a hard edge to Crowland. This is hard to reconcile given that there are three typical examples of this type of track/ road within the vicinity of the application site. All provide a typical soft agricultural feel to the tracks/ roads with grass and landscaping being allowed to dominate the edges so that when seen from a distance they appear as a green swathes across a horizontal landscape rather than a hard kerb line.

Pedestrian and Cycle access is available via an existing tarmac access to the south west of the application site which provides access to Postland Road.

Access to the principle entrance of each home will be level and will be provided with a level threshold. Each home will also be provided with the facility for installing a lift ensuring access to all for the life of the homes.

5.9 Maintenance

Each property will be sold on a freehold basis and will be responsible for maintaining their own properties.

Restrictive covenants will be placed on each property to ensure that residents ensure the look of the development is maintained.

Communal areas will be maintained by a Management Company. For more information see the Illustrative Maintenance Plan.

5.10 Waste

Each property will be provided with internal bins for household refuse and recycling. Once these bins are full residents will empty them into external bins stored within the private gardens of each home. A private collection company will be employed by the Management Company for the development and residents will be asked to bring out their bins on the appropriate collection day. The main access drive will be designed to allow the refuse vehicle to enter the site and pick up the bins from the edge of each dwellings drive. For further details please see the Illustrative Maintenance Plan.

Each home will also be provided with internal food waste bins which can be filled with vegetable peelings and food waste. This can then be transferred into external wormery compost bins located in the gardens of the dwellings. These compost bins would be used for vegetable waste and garden waste, such as grass and hedge cuttings. Once all this green matter has been naturally broken down it can be reused in flower beds as a natural compost. By doing this across the site it negates the amount of green waste having to leave the site and be taken to landfill or the residents having to drive the green waste to a Council operated waste facility.

5.11 Affordable Housing

Policy 18 of the South East Lincolnshire Local Plan 2019 seeks the provision of 25% affordable housing on schemes with 11 or more dwellings or residential developments with an internal floor area of 1,000sqm or more.

Given the nature of the site and the measures included to deal with flood risk it is felt that the maximum 1,000sq. m gross floor area would unfairly disadvantage the scheme by virtue of having to include the ground floor un-habitable areas within the gross floor area calculation.

There is also an argument to say that a self-build site is not an appropriate location for affordable housing and that the provision of serviced self-build plots is actually dealing with a crucial housing need within the District given the number of applicants on the current Self-build Register at South Holland District Council.

On that basis of the above no affordable housing is proposed as part of the scheme.

5.12 Summary of Proposed Development

The proposals as illustrated demonstrate that the site can be developed for a self/ custom build housing use. Views into the site can be softened by incorporating significant planting on the eastern boundary of the site and the access road can be designed to reflect similar local tracks/ roads without the need for incorporating hard materials.

6.0 Key Sustainability Issues

6.1 Environmental Sustainability

6.1.1 Climate Change

6.1.1.1 Greenhouse Gas Emissions

6.1.1.2 Carbon Footprint

6.1.1.3 Climate Resilience

6.1.1.4 Environmental Impact Assessment

6.1.1.5 Sustainability Reporting

6.1.1.6 Stakeholder Engagement

6.1.1.7 Policy and Regulation

6.1.1.8 Innovation and Research

6.1.1.9 Collaboration and Partnerships

6.1.1.10 Monitoring and Evaluation

6.1.1.11 Communication and Awareness

6.1.1.12 Capacity Building

6.1.1.13 Data Collection and Analysis

6.1.1.14 Policy Implementation

6.1.1.15 Stakeholder Feedback

6.1 General

The following section considers how the proposals will deliver its sustainability objectives and make a lasting and positive contribution towards sustainable development. The basic framework for analysis corresponds with the three key sustainability issues set out in planning and environmental legislation, guidance and best practice.

Sustainability in relation to the location of the site, amenities and public transport links are discussed in detail earlier within this report.

Environmental Issues

6.2 Energy

The need to reduce greenhouse gas emissions, particularly carbon dioxide (CO₂), and adapt to effects of climate change is recognised as a global imperative. A key objective of the scheme has therefore been to encourage energy efficiency in all aspects of the home, including design, procurement, construction and use.

The building design includes environmental strategies throughout with the use of fabric-first detailing, heat recovery ventilation and passive solar gains. Passive solar gains will be achieved through controlled openings to the south with heavy weight floor and surface finishes storing the thermal energy, which will be released during the cooler parts of the day/ night.

The homes will generate its own electricity through Photovoltaic Modules, storing a proportion in batteries for use by each home in 'high demand' times and selling the remainder back to the grid. The homes will also be provided

with 100% low energy lighting, mechanical ventilation heat recovery and a ground source heat pump reducing energy consumption within each home.

All walls, floors and roofs will be highly insulated and the building airtightness will be improved significantly beyond current Building Regulations to provide a home which uses less energy than a typical developer constructed house of the same size.

The Standard Assessment Procedure (SAP) is adopted by Government as the UK methodology for calculating the energy performance of dwellings. The calculation is based on the energy balance taking into account a range of factors that contribute to energy efficiency:

- Materials used for construction of the dwelling
- Thermal insulation of the building fabric
- Ventilation characteristics of the dwelling and ventilation equipment
- Efficiency and control of the heating system(s)
- Solar gains through openings of the dwelling
- The fuel used to provide space and water heating, ventilation and lighting
- Energy for space cooling, if applicable
- Renewable energy technologies

The calculation is independent of factors related to the individual characteristics of the household occupying the dwelling when the rating is calculated.

A Design Stage Standard Assessment Procedure Calculation for the illustrative home has been produced and a copy of the full calculation has been submitted with

this application.

The key highlights of the calculation in relation to the A-rated home and its comparison with a typical developer constructed home is as follows:

1. Typical Home Dwelling Fabric Energy Efficiency 45.2kWh/m²/year

Proposed Home Dwelling Fabric Energy Efficiency 43.2kWh/m²/year - **4.5% IMPROVEMENT**

2. Typical Home Carbon Dioxide Emission Rate 12.54kg/m²/year

Proposed Home Carbon Dioxide Emission Rate 0.31kg/m²/year - **97.5% IMPROVEMENT ON CARBON EMISSIONS**

Based on the model SAP calculations produced the proposals can be seen as providing new homes that are significantly more sustainable than a new home which currently meets Building Regulations. In fact the new homes would produce around carbon dioxide equal to only **one third** of a bag of sugar per year. Where as a typical home built to Building Regulations is producing around **twelve** bags of sugar. Therefore these new homes must be seen as a highly sustainable solution to new housing.

It is understood that there are no major water courses flowing through the site and therefore the risk of water pollution is very low. There is however a drain to the eastern boundary of the site which will be fully protected during construction.

The site lies within Flood Zone 3a and a site specific Flood Risk Statement accompanies this statement confirming that the application site is not at risk of flooding.

6.4 Transport

' Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, improve air quality and public health. However, opportunities



- ## Flood Resistant Measures

to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.'

The focus of paragraph 103 is on a choice of sustainable transport modes with the aim of reducing congestion, emissions and improving air quality. It also recognises that the opportunities for sustainable transport solutions will vary between urban and rural areas and this should be taken into account in decision making.

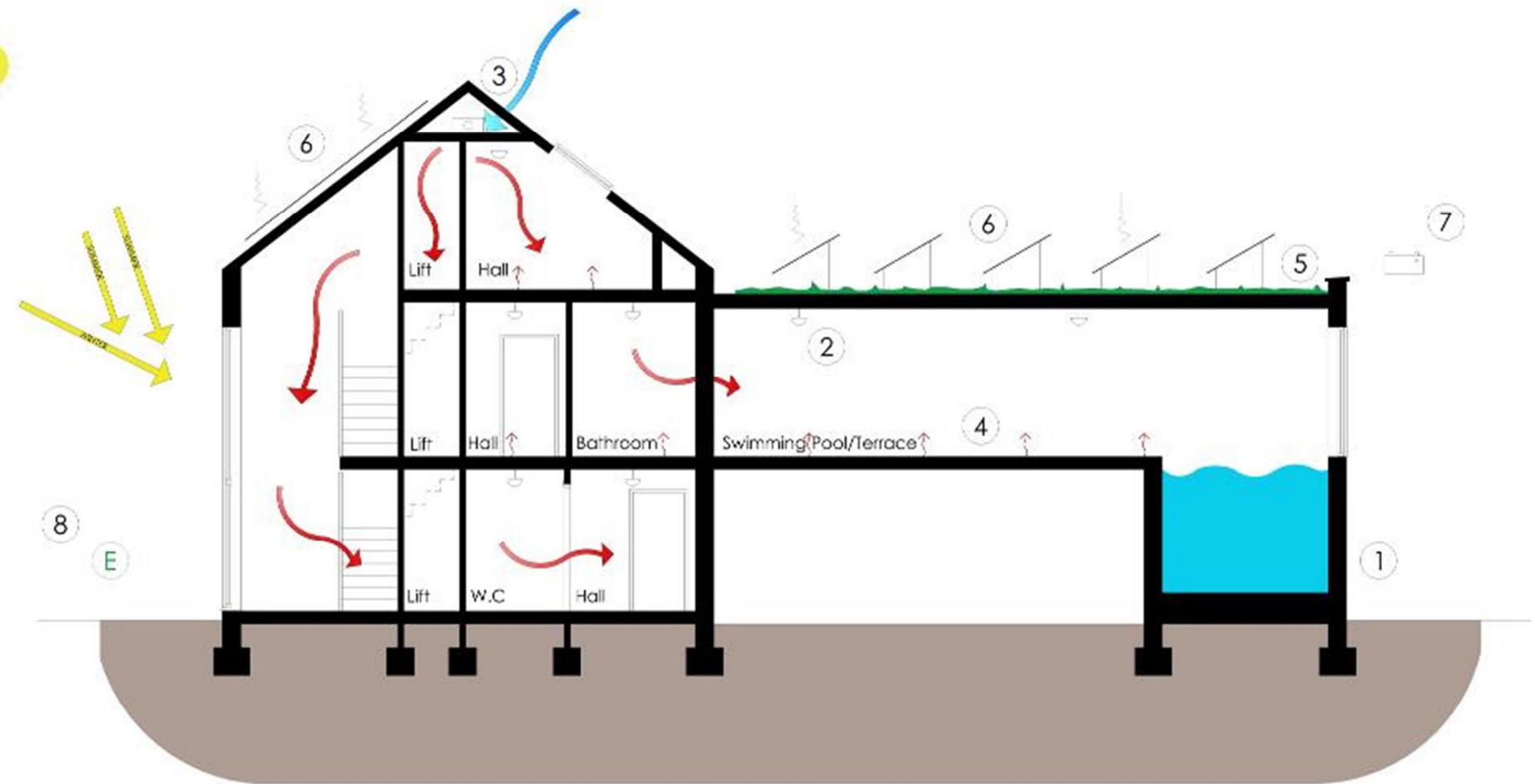
The Department of Transport *National Travel Survey 2017* findings outlines the mode of transport and their relevant percentage of trips as follows;

- Car 61% of all trips;
- Walking 26% of all trips;
- Bus 6% of all trips;
- Train 2% of all trips;
- Cycling 2% of all trips;
- Other 3% of all trips.

These figures suggest that peoples choice of travel mode is predominantly the conventional car with walking being their second choice. In rural areas the figures show an increase in the choice of car use up to 76% with only 4% of trips taken on public transport.

The main difference in travel patterns between urban and rural areas lies in the use of the car and this is reinforced by

Design and Access Statement



Sustainability Measures

- 1 - Highly insulated walls, floors and roofs.
- 2 - Energy efficient light fittings.
- 3 - Mechanical heat recovery ventilation system providing fresh air and re-using heat generated by the building to warm incoming air.
- 4 - Under floor heating with heat input from ground source heat pump.
- 5 - Green roof reducing rainfall run-off.
- 6 - Photovoltaic modules generating electricity.
- 7 - Battery storage for electricity from PV modules.
- 8 - Electric car charging point.

Sustainability Measures

data which suggests that almost 60% of rural homes have two or more cars. It therefore can be generally accepted that living in rural areas creates a need for the use of a car and the NPPF 2018 recognises this in allowing a clear change in decision making between urban and rural areas. It also clearly states that occupants should be offered the choice of transport modes and this proposal seeks to offer that choice to the occupants of the new homes.

Conventional Car

It is accepted that given the sites rural location the household is likely to have at least one conventional car. However should the occupants decide to use the car it is likely to be for very short trips given the sites close proximity to the centre of Crowland, the City of Peterborough and Spalding the largest settlement within the South Holland District. Both Peterborough and Spalding contain significant services including primary and secondary schools, supermarkets, doctors, dentists recreation space/ facilities and further public transport links including national rail links.

In a recent appeal decision (APP/D3505/W/18/3196882) for two dwellings in Newman's Green, Suffolk the Planning Inspector found that whilst there would be a dependence on the car it would be mitigated by the fact that the site was very close to a large settlement with significant services and therefore car trips would generally be very short distances. The difference between urban and rural areas being at the forefront of the Inspectors thought process.

Electric Car

The proposed new homes will be provided with two electric car charging points powered by electricity generated using on site photovoltaic modules. This creates a genuinely low carbon alternative to the conventional car, whereby



vehicles can be powered through energy generated on site. This meets the NPPF's goals of reducing emissions and improving air quality. It also complies with the definition of sustainable transport set out within the Glossary to the NPPF, which defines 'sustainable transport modes, as follows:

'Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra emission vehicles, car sharing and public transport.'

As such it is entirely likely that vehicular trips from the site will themselves be a sustainable mode of transport.

Walking

The National Planning Policy Framework (NPPF) does not provide specific guidance on walking distances. However, Manual for Streets states that:

'Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes (up to 800m) walking distance of residential areas which residents may access comfortably on foot. However, this is not an upper limit and PPG13 states that walking offers the greatest potential to replace short car trips, particularly those under 2km.'

White Young Green (WYG) have recently undertaken research, titled, *How far do people walk?* (July 2015), which examined National Travel Survey (NTS) data to establish actual walking distances to public transport and local facilities. The WYG analysis of NTS data for walking as a main mode (outside of London) is 1,150m and the 85th percentile distance is 1,950m. Therefore, the 85th percentile walking distance is similar to the 2km distance widely applied for walking trips as a main mode, albeit 15% of people walk

further than this.

The site lies a short distance from an existing bus stop on Postland Road which is served by regular bus services. It is also within walking distance of the centre of Crowland, some 1.3km walking distance. Which is in line with the guidance within the Manual for Streets and the findings of WYG.

Occupants of the new home will have an alternative to the use of a car.

Cycling

The roads surrounding the site are categorised as ‘*Routes found useful by local cyclists*’ within Lincolnshire County Council’s published maps and as such offers a further alternative to the occupants of the homes.

Crowland also has a National Cycle Route (National Route 12) which provides access to Spalding town centre.

Public Transport

The site lies in close proximity to a bus stop on Postland Road (approximately 400m to the west of the site) which is serviced by the Inter Connect 37 bus route from Peterborough to Spalding. This bus is scheduled to stop at The Gardens hourly from 6.30 am to 9.00pm Monday to Friday with a more restricted schedule on Saturdays. This bus service provides a service directly to Peterborough with further opportunities for public transport via national train links.

Design and Access Statement

6.5 Waste During Use

Sustainable development demands a fundamental change in the way we design, produce, use and dispose of the products we consume. Every effort has been made to design out the production of on-site waste.

The homes will be provided with dedicated internal bins within the Kitchen to allow the separation of recyclable and kitchen waste from landfill waste. These bins in-turn can be emptied into external bins and brought out to the kerbside of the road for collection by a private collection company on the appropriate day.

The home will also be provided with compost bins of a minimum 900 litre capacity, reducing garden and food waste going to landfill.

The occupiers of each home will be encouraged to grow their own food and therefore reduce waste. Each home will be provided with a space for a Kitchen garden which allows this to be cultivated in accordance with the occupiers wishes. As part of the Kitchen Garden, compost bins will be provided to each home reducing the need for removal of garden waste from each home.

6.6 Waste During Construction

Where possible materials have been chosen to minimise on-site waste. Where this is not possible waste will be segregated on site to allow recycling where possible and to reduce waste going to landfill.

6.7 Materials

Materials within the proposals have been carefully chosen

to suit the architectural style, use materials with low embodied energy or materials that are either recycled or can be recycled and materials that reduce waste to landfill.

6.8 Biodiversity

A key element of the proposals is to improve biodiversity within the site and the scheme includes the provision of bird boxes, and insect hotel, log pile habitats as well as a new wild flower meadow, general planting and a new Kitchen gardens.

The provision of all of the above will significantly improve biodiversity within the site.

6.9 Summary of Key Sustainability Features

The site is located in Crowland a highly sustainable location very close to the City of Peterborough. The site itself has pedestrian and cycle links to the town centre and public transport links. Each home will be provided with electric car charging points with electricity supplied by photovoltaic modules and stored in batteries on site. Making the use of an electric car powered by electricity generated on site in a sustainable way entirely possible for the homes new residents.

Each home will also be provided with the following:

- Rainwater harvesting;
- Greywater harvesting;
- Highly energy efficient with an Energy Performance Certificate rating of ‘A’;
- 100% energy efficient lighting provision;

-
- Mechanical Ventilation Heat Recovery;
 - Improvement of biodiversity through the site by the introduction of new habitats;
 - Reduction in waste going to landfill by the provision of on site compost facilities
 - Inclusion of SuDS to manage surface water within the site;
 - Inclusion of foul water treatment to each home.

7.0 Conclusions

7.1 Summary of Material Planning Considerations

Whilst it is accepted that the Council can currently demonstrate a 5 year land supply of housing, this should be seen in the context of many years of under delivery. It should also be noted that 5 year land supply figures are minimum figures and do not prevent the Council granting permission for more homes than the 5 year land supply figure.

Self/ Custom Build homes are not currently catered for within the South Holland District and the Council has confirmed that 42 people are currently seeking self-build plots and that the Council have not allocated any specific land for self-build plots. They also confirmed that they do not monitor the provision of self-build plots within the district. This is clearly contrary to The Self-Build and Custom Housebuilding Act 2015, and as such the Council are failing as duty holders.

The type and tenure proposed of the housing also adds to the variety of housing stock within the District and meets a clearly identified need.

Crowland is a highly sustainable location for development being a Main Service Centre within the newly adopted Local Plan. The site itself is well served with pedestrian and cycle access as well as a drive for the use by conventional and electric vehicles. Each home will be provided with electric car charging points with electricity generated by photovoltaic modules and stored in batteries on site.

Alongside highly sustainable homes will also enhance bio-diversity on site by taking advantage of the existing woodland area and by creating new habitats with the pond at the centre of the site.

It is accepted that the site is within Flood Zone 3a but that

could be said of the majority of the South Holland District. The site specific Flood Risk Assessment has demonstrated that the risk of flooding on the site is no worse than sites currently receiving planning permission or within the Local Plan as allocations. That suggests that the Council believes development within Crowland is acceptable and that there are not sequentially preferable sites within the settlement.

7.2 Summary of Proposed Development

The proposals as illustrated demonstrate that the site can be developed for a self/ custom build housing use. Views into the site can be softened by incorporating significant planting on the eastern boundary of the site and the access road can be designed to reflect similar local tracks/ roads without the need for incorporating hard materials.

7.3 Summary of Key Sustainability Features

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- Mechanical Ventilation Heat Recovery;
- Improvement of biodiversity through the site by the introduction of new habitats;
- Reduction in waste going to landfill by the provision of on site compost facilities
- Inclusion of SuDS to manage surface water within the site;
- Inclusion of foul water treatment to each home.

7.4 Overall Project Summary

This proposal for 6 self/ custom-build eco homes addresses a clear need within the District and this combined with an aspiration to create high quality sustainable homes within the scheme with a clearly defined Design Code is exceptional for the District. The architecture within the proposals is of a high level responding directly to the site, its proposed occupants and their need for modern energy efficient buildings.

The proposals aim to offer a design solution for new homes within the flood risk areas of the Fens. Scale and form within the flat landscape of the Fens is crucial and this scheme demonstrates that flood risk can successfully be dealt with through a considered design solutions.

Careful consideration has also been given to the sustainability of the scheme and the proposed homes are designed to significantly save energy as well as being located in a highly sustainable location. Responding to the aspirations of the NPPF in delivering homes which respond to local need and the current and future requirements of Climate Change.

It is therefore felt that this scheme is exceptional for the District and will make a significant contribution to housing need and in particular serviced plots designed for self-builders.

Given the exceptional nature of the proposed application and the Councils lack of allocated land for self/custom build homes it is felt that the application should and could be approved without delay.

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