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Land at Balmoral Way, Holbeach

Supporting Planning Statement

Residential Development of 48 new Homes

02/15



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1 Introduction

1.1 This Supporting Planning Statement has been prepared in support of a full planning application by Benchmark Properties Ltd for residential development comprising 48 new homes together with associated parking and private and communal amenity space. The proposals include a mix of private and affordable housing, with 16 affordable homes to be provided, meeting the Council's policy requirement for 33% provision.

1.2 The application site lies to the east of Balmoral Way, and north-west of Foxes Low Road. It is immediately adjacent the edge of the settlement, as defined by the boundary shown on the adopted Local Plan Proposals Map.

1.3 This Supporting Planning Statement sets out the planning case in favour of the proposed development, and also considers some technical matters in relation to the flood risk Sequential and Exceptions Tests.

1.4 The proposed development will make a useful contribution towards meeting the housing need in the local area. This need is immediate, as there is not currently a 5 year housing land supply in South Holland District. It would also help to meet a longer-term strategic need for housing in Holbeach, identified in the emerging South East Lincolnshire Local Plan. The site is also sustainably located within walking distance of a range of shops, services, employment opportunities and public transport.

1.5 This application has been prepared with regard to local and national planning policies and has also benefited from pre-application discussions with South Holland District Council and the Highway Authority, Lincolnshire County Council.

1.6 The site is located within Flood Zone 3a, as defined by the Environment Agency's flood map and the Council's Strategic Flood Risk Assessment (SFRA). It lies outside the functional flood plain (Flood Zone 3b), and so the NPPF allows for residential development to take place, subject to it having passed the sequential and exceptions tests. The sequential test requires that the development is necessary, and that there should not be other reasonably available sites which are more favourably located with regard to flood risk, and which could meet this need.

1.7 Where the Sequential Test is passed, the Exception Test is then applicable. This requires the development to provide wider sustainability benefits that outweigh flood risk. A site-specific flood risk assessment (FRA) is also required to demonstrate that 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. These technical considerations are considered in a separate FRA prepared by Geoff Beel Consultancy, whilst the wider sustainability benefits of the proposal are considered in this report.

1.8 This planning application is accompanied by a range of technical reports which demonstrate that the proposal would not have any unacceptable adverse impacts, and that this would be a sustainable form of development.

2 The Site and its Surroundings

2.1 The application site is situated off Balmoral Way, a residential road off Kings Road and Foxes Low Road. Foxes Low Road provides a key link from the northern A17 to the town centre.

2.2 The site is currently vacant agricultural land with some outbuildings present on its southern side. The site's area is 1.75 hectares. It is accessible from both Balmoral Way and Foxes Low Road.

2.3 To the south-west and south-east the site currently borders residential housing and the settlement boundary as defined in the Local Plan 2006.

2.4 To the north-west the site abuts agricultural fields.

2.5 To the north-east the site abuts vacant agricultural land, which is predominantly overgrown with dilapidated outbuildings.

2.6 The area surrounding the site is predominantly in residential use with some light industrial use off Foxes Low Road. Balmoral Way is predominantly residential in character and largely comprised of single and two storey dwellings.

2.7 The application site is outside the conservation area for Holbeach and not within the curtilage of any listed buildings.

2.8 Holbeach is identified as an 'Area Centre' within the district and as such the application site benefits from access to a full range of local services and facilities.

2.9 Carters Park is located centrally within the town, and within walking distance; it provides a good source of local amenity including children's play space.

2.10 Bus routes pass through Holbeach along the B1515 and provide frequent services to Spalding to the west and Kings Lynn to the east. Both Spalding and Kings Lynn have their own train stations which provide easy access to London in the south and Edinburgh to the north via the east coast mainline, as well as links to the east via Ely.

3 The Proposed Development

3.1 The proposals seek to develop the site to provide a residential scheme comprising of forty-eight 1, 2, 3 and 4 bedroom homes, together with associated parking and private and communal amenity space. The proposal at its heart aims to create an affordable, sustainable and high quality development that will make a positive contribution to the settlement of Holbeach, and help to meet local housing need.

3.2 The housing proposed will include a mix of dwellings to meet a range of needs across the local community. This will include smaller homes, ideal for those on the first rungs of the housing ladder, or people looking to down-size. It will also include a range of family housing. The housing mix for the development as a whole is as follows:-

- 7 no. 2 bedroom houses
- 17 no. 3 bedroom houses
- 8 no. 4 bedroom houses
- 3 no. 1 bedroom affordable houses
- 7 no. 2 bedroom affordable houses
- 6 no. 3 bedroom affordable houses

3.3 The proposed mix of housing includes 33% affordable housing, in accordance with the Council's policy requirements.

3.4 The proposals are also accompanied by the necessary supporting infrastructure, such as in relation to highways and surface and foul water drainage. In addition, provision is made for new public open space, including a Local Area for Play (LAP), which would be accessible to new and existing residents.

3.5 This is a full planning application with the full detail of the proposed homes and the layout of the development provided within the application documents and drawings. The intention of setting out the full detail of the proposals at this stage, rather than seeking an outline planning permission, is to allow Benchmark Properties to deliver the housing quickly, and within 5 years of a planning permission being granted.

This implies that the development can make a positive contribution to meeting housing need in the short-term, and to boosting the Council's 5 year housing supply.

3.6 The application site has no recent planning history.

4 Planning Policy Review

4.1 This section sets out the main planning policy considerations which relate to the proposed development.

4.2 Planning law requires that applications for planning permission must be made in accordance with the development plan, unless material considerations indicate otherwise[1]. The development plan for South Holland District comprises the saved policies of the South Holland Local Plan 2006. In addition, the National Planning Policy Framework (NPPF) sets national planning policy, and forms a material consideration with relevance to planning decision-making. The National Planning Practice Guidance (NPPG) provides clarification on the implementation of national policy.

National Planning Policy Framework (NPPF)

4.3 The NPPF states that the purpose of planning is to help achieve sustainable development. The most widely recognised definition of sustainable development was coined by the Brundtland Commission in 1987, as **'development that meets the needs of the present without compromising the ability of future generations to meet their own needs.'** Building on this definition, paragraph 6 notes that the NPPF as a whole sets out the Government's view of what constitutes sustainable development, while paragraph 7 states that there are three dimensions to sustainable development, comprising economic, social and environmental roles, as follows:

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

- **<u>A social role</u> – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet**

[1] See Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990

the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

- **<u>An environmental role</u> – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.**

4.4 Paragraph 8 emphasises the need for the planning system to balance these different dimensions. They are discussed further with regard to this application in Section 8 of this Statement.

4.5 The fundamental precept of the NPPF is a presumption in favour of sustainable development. Paragraph 14 states that for decision-making, this means:

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

4.6 Footnote 9 then clarifies that the policies in the NPPF which may indicate that development should be restricted relate to the issues such as the protection of European designated wildlife sites, land designated as Green Belt or AONB and designated heritage assets. None of these considerations relate to the application site.

4.7 We do not believe that any of the policies in the NPPF or its technical guidance indicate that development should be restricted on the application site, and as such, we believe that the application proposals benefit from the presumption in favour of sustainable development.

4.8 It is important to note that, where this presumption applies, any adverse impacts must be so great as to **'significantly and demonstrably outweigh the benefits'**. Negative effects must therefore be very substantial in order to outweigh the clear benefit which the development would bring. With regard to this application, we do not believe that there are any significant adverse effects associated with the proposed development, and certainly nothing that would outweigh the benefits which the proposals would bring.

4.9 With regard to residential development, the NPPF gives great weight to the need to **'boost significantly the supply of housing'** (paragraph 47) and it requires the provision of a rolling 5 year supply of deliverable housing sites, plus a buffer of 5% or 20% to ensure competition in the market. Where such a provision is not in place, **'relevant policies for the supply of housing should not be considered up-to-date.'** Proposals for residential development should also be **'considered in the context of the presumption in favour of residential development'** (both paragraph 49). New Local Plans should, as far as possible, meet **'the full objectively assessed needs for market and affordable housing in the housing market area.'** This includes rural areas, where **'local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing'** (paragraph 54).

4.10 In circumstances where the 5 year supply of deliverable housing sites is not met, the NPPF is quite clear that the **'presumption in favour of sustainable development'** applies. The need for residential development in South Holland is considered further in section 7.

4.11 Annex 1 of the NPPF concerns the implementation of its policy guidance. Within this section, paragraph 214 implies that Local Plans which were adopted prior to the NPPF's publication (March 2012) should now be considered out of date. In this context, paragraph 215 goes on to state that **'due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to the policies in the**

Framework, the greater the weight that may be given).' Therefore, as the policies in the development plan were published prior to the Framework, they can only be accorded weight in decision making in accordance with their consistency with the Framework.

4.12 With regard to proposals for development in areas adjudged to be at risk of flooding, paragraph 100 of the NPPF sets out the following guidance:

> **"Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere."**

4.13 The NPPG sets out the procedure for directing suitable locations for development, in accordance with sequential and exceptions tests. These matters are considered in section 6 of this statement.

South Holland Local Plan (2006)

4.14 As noted above, the saved policies of the South Holland Local Plan comprise the development plan for the area. The saved policies which are considered relevant to the application proposal are considered below.

4.15 Policy SG1, **General Sustainable Development**, states that:

> **"Planning permission for development will be granted where the Council is satisfied that the proposal is consistent with the principles of sustainable development, and where:**
>
> 1. **the quality of life for residents is unimpaired or enhanced;**
> 2. **reasonable measures have been taken to conserve energy and natural resources; and**
> 3. **South Holland's essential character and main environmental assets are not damaged."**

4.16 Section 9 of this statement demonstrates how the proposals are consistent with the principles of sustainable development, as defined by the NPPF.

4.17 With regard to point 1, the development has been carefully designed to ensure that it is sensitively integrated with the housing development to the southwest, and would thus avoid any unacceptable impacts on the amenity of existing residents. Further consideration is given to this matter below in response to Policy SG17.

4.18 With regard to points 2 and 3, we consider that reasonable measures have been taken to conserve natural resources and avoid damage to environmental assets. Where possible existing vegetation is to be retained and enhanced through landscape planting. Tree and shrub planting within gardens and across the areas of public open space will provide further potential habitats.

4.19 Policy SG2, **Distribution of Development**, states that:

> **'All proposals for development must be located having regard to sustainable development principles. They should:**
>
> 1. **adopt a sequential approach which gives priority to the use of previously developed land and buildings within defined settlement limits, then to greenfield land within defined settlement limits and finally to land adjacent to defined settlement limits;**
> 2. **make efficient use of land;**
> 3. **ensure that, wherever possible, development is served by a choice of transport modes including existing public transport or by improvements to public transport infrastructure linked directly to the development and the existing highway network; and**
> 4. **ensure that the development is acceptable in terms of traffic generation and road safety in the surrounding area.'**

4.20 The need to adopt a sequential approach to locating new housing development is considered further in subsequent sections of this statement. With regard to points 2 to 4, we consider that the proposal achieves these objectives for the reasons set out in the Design and Access Statement and Transport Statement, which accompany this planning application.

4.21 Policy SG3, **Settlement Hierarchy**, identifies that Holbeach is an **"Area Centre"** which "**will continue to provide for housing, employment and commercial development to support their roles as service centres for surrounding rural areas."** This policy is considered further in section 7 of this statement.

4.22 Policy SG4, **Development in the Countryside**, concerns development proposals which are located beyond defined settlement limits. It states that:-

> **'Planning permission will only be granted for development in the open countryside which is essential in the proposed location and cannot reasonably be accommodated within defined settlement limits. Development proposals that would result in an unacceptable impact upon the landscape character of an area, either individually or cumulatively, will only be permitted where:**
>
> 1. **the need for the development in that location outweighs its impact; and**
> 2. **no other site or solution exists to accommodate the proposed development.**

4.23 This policy is considered further in section 7 of this statement.

4.24 Policy SG6, **Community Infrastructure and Impact Assessment**, requires proposals for new development to include measures to demonstrate how public infrastructure and services required to support the development will be delivered. Where it is demonstrated that the development will have a negative impact on existing services, this will be mitigated through financial contributions, subject to viability. This will be discussed further with the Council during the course of its consideration of the application.

4.25 Policy SG7, **Energy Efficiency**, requires new developments to achieve maximum efficiency through site design and orientation. It also requires developments of 10 dwellings of more to demonstrate good practice in energy efficiency and incorporate renewable energy production to meet at least 10% of its predicted energy requirements. More recently the Government has carried out its own Housing Standards review and concluded that energy efficiency measures within new dwellings should be regulated through Building Regulations and not by Local

Planning Authorities. The Applicant therefore feels that compliance with Part L 2013 of the Building Regulations is sufficient to meet the level of energy efficiency expected by the policy. It should be noted that new dwellings built in accordance with Part L 2013 are approximately 31% more efficient than those built to Part L 2006 (i.e. those that existed when the Local Plan was adopted).

4.26 Policy SG11, **Sustainable Urban Drainage Systems (SUDS)**, concerns the application of surface water drainage measures, where appropriate and relevant. A site specific Flood Risk Assessment accompanies this statement, which sets out the surface water drainage measures proposed for the new development.

4.27 Policy SG12, **Sewage and Development**, requires proposals that would give rise to foul sewage to include provision for its effective collection, treatment and disposal. In this case, all new dwellings will be connected to the mains foul drainage system.

4.28 Policy SG13, **Pollution and Contamination,** seeks to avoid unacceptable levels of pollution by noise, light, odour, or by the release of waste products, and requires new development to provide, as necessary, appropriate treatment of land to clean up contamination. The proposed residential development is not expected to give rise to unacceptable pollution in terms of noise, light or odour. Furthermore, the previous agricultural use of the land is not expected to give rise to any exceptional or insurmountable contamination issues.

4.29 Policy SG14, **Design and Layout of New Development,** requires new development to be of a high standard of design and layout and to reflect local distinctiveness. A number of criteria are set out within the policy to promote these aims. We have not commented directly on these criteria, as the matters they concern are considered within the Design and Access Statement, which accompanies this planning application. In general terms, however, the design philosophy underpinning the proposals aims to deliver a development which has a clear affinity with common aspects of the traditional town, along with the character and architectural style that are appropriate to the local area. The proposals therefore aim to strike a balance between accommodating historical references taken from the town centre on the one hand, and creating an attractive, modern development in its own right with a clear structure and identity, on the other.

4.30 Policy SG15, **New Development: Facilities for Road Users, Pedestrians and Cyclists** requires new development to provide safe and convenient access to and within the site for all users. Policy SG16, **Parking Standards in New Development,** requires new development to provide appropriate parking and servicing arrangements.

4.31 All new roads and footways within the development will be designed in accordance with the "Lincolnshire Design Guide for Residential Areas" and the County Council publication "Development Guide on the Transport and New Development Issues in Lincolnshire."

4.32 With regard to parking, all new dwellings will be provided with 200% parking provision together with private gardens, which will allow the provision of cycle storage should residents wish. These matters are considered within the Transport Statement, which accompanies this planning application.

4.33 Policy SG17, **Protection of Residential Amenity**, states that permission will be granted for development which would not cause harm to residential amenity. The layout of the site has been carefully designed so as to avoid any unacceptable loss of privacy, loss of natural light and / or creating an overbearing impact on existing residents. For example, Public Open Space is proposed along the south-western boundary of the development to increase the separation distance between existing and proposed properties. Also, the existing property to the south-east of the site would be addressed by the back gardens of the proposed dwellings to again increase the separation distance.

4.34 Policy SG18, **Landscaping of New Development**, supports the retention of existing landscape features and the provision of new strategic tree planting of indigenous species to improve the setting of development within the wider landscape. Landscaping is considered to be key for the design of the development and as such existing landscape features have been retained where possible. This includes the established tree belt along the north-western boundary, which serves to provide a natural edge to the development. Landscaping within the site is carefully considered and is deliberately designed to define public and private spaces. These issues are considered further within the Design and Access Statement, which accompanies this planning application.

4.35 Policy HS4, **New Housing in Spalding and the Area Centres,** identifies that new housing will be permitted on suitable sites within Area Centres, such as Holbeach, where the site is within the defined settlement limits and constitutes brownfield land, unless it can be demonstrated that no suitable brownfield sites are genuinely available. Policy HS7, **New Housing in the Open Countryside including other Rural Settlements,** identifies that outside the defined settlement limit of Holbeach, new housing will only be permitted for small scale, rural exception affordable housing.

4.36 These policies are considered further in section 7 of this statement.

4.37 Policy HS8, **Affordable Housing,** requires, for residential developments of three or more dwellings, the provision of a minimum of one third of the residential dwellings as affordable housing. Sixteen of the 48 dwellings proposed on site will be affordable homes thus achieving compliance with this policy.

4.38 Policy HS11, **Open Space in New Residential Developments,** requires at least 14% of the site area of new residential development to be provided as open space. Where this is not possible, or where development is in close proximity to a sufficient sized area of existing open space, the Council will accept financial contributions for the provision or enhancement of open space off-site.

4.39 In this case, 12% of the site area will be provided as public open space. This includes a Local Area for Play (LAP) measuring 100sq m. This is intended for use by younger children and will be available for use by both residents of the new development and existing residents of Holbeach. The details of the play equipment within the LAP and boundary treatments are to be agreed with the Council, and we envisage that these details can be set out in relation to a planning condition. The future management and maintenance of this area of open space will be ensured by a service charge on the new housing, and administered by a management company run by residents.

4.40 The provision of less than 14% open space has been discussed and agreed with the Council during pre-application discussions. In this case, given that the site is within walking distance (20 minutes) of Carter's Park, a pleasant and modest sized park, it was considered reasonable for 12% open space to be provided, and for a financial contribution to be made to make up the shortfall.

Emerging South East Lincolnshire Local Plan

4.41 Once adopted, the South East Lincolnshire Local Plan will set out planning policies up to 2031. It is being jointly produced by South Holland District Council and Boston Borough Council and will eventually replace the existing South Holland Local Plan 2006.

4.42 The Councils carried out a Preferred Options stage consultation on a Core Strategy DPD in May 2013. At this stage, it was intended to produce the South East Lincolnshire Local Plan in two parts – a Core Strategy, followed by a Site Allocations document. However, at its meeting on 28th February 2014, the Joint Strategic Planning Committee decided that the delivery of new homes and jobs for the area will now be provided for through a single Local Plan. Work on the Local Plan is currently taking place and the Councils expect to carry out public consultation on the document in 2015.

4.43 However, it is worth noting the content of the previous consultation draft Plan, in as much as it sets out the Council's aims and objectives for development in the future. In this regard, we note that the draft Plan identifies the following relevant strategic priorities:-

- **To deliver development in sustainable locations that seeks to meet the needs of the whole area through the identification of a strategic planning framework that takes account of flood risk to guide the scale, distribution and nature of new development across South East Lincolnshire.**

- **To seek to meet the housing needs of the whole of South East Lincolnshire's population, including the provision of an appropriate proportion of affordable housing for those in need.**

5 Policy and Guidance on Flood Risk

5.1 With regard to proposals for development in areas adjudged to be at risk of flooding, the NPPF sets out the following guidance:

100. "Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere." Local Plans should be supported by Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards. Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by:

- **applying the Sequential Test;**
- **if necessary, applying the Exception Test;**
- **safeguarding land from development that is required for current and future flood management;**
- **using opportunities offered by new development to reduce the causes and impacts of flooding; and**
- **where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations.**

101. The aim of the Sequential Test is to steer new development to areas with the lowest probability 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 probability of flooding. The Strategic Flood Risk Assessment will

provide the basis for applying this test. A sequential approach should be used in areas known to be at risk from any form of flooding.

102. If, following application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding, the Exception Test can be applied if appropriate. For the Exception Test to be passed:

- **it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared; and**
- **a site-specific flood risk assessment must demonstrate that 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.**

Both elements of the test will have to be passed for development to be allocated or permitted.

5.2 The NPPG sets out further guidance concerning the implementation of the sequential and exceptions tests. This clarifies that Flood Zone 1, being at the lowest risk of fluvial flooding, is the starting point for the sequential approach, followed by sites in Flood Zones 2 and then 3. The sequential test is not intended to form a prohibition on development within Flood Zones 2 and 3, but it is rather intended to make the decision-maker consider whether there are alternative locations which could accommodate any necessary development in preference to a site within these Flood Zones. The NPPG summarises the sequential test as follows:

'This general approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. The aim should be to keep development out of medium

and high risk flood areas (Flood Zones 2 and 3) and other areas affected by other sources of flooding where possible.'[2] **(my emphasis)**

5.3 With regard to the aim of the sequential test, the NPPG defines this as follows:

'The Sequential Test ensures that a sequential approach is followed to steer new development to areas with the lowest probability of flooding. The flood zones as refined in the Strategic Flood Risk Assessment for the area provide the basis for applying the Test. The aim is to steer new development to Flood Zone 1 (areas with a low probability of river or sea flooding). Where there are no reasonably available sites in Flood Zone 1, local planning authorities in their decision making should take into account the flood risk vulnerability of land uses and consider reasonably available sites in Flood Zone 2 (areas with a medium probability of river or sea flooding), applying the Exception Test if required. Only where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 (areas with a high probability of river or sea flooding) be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required.'[3] **(my emphasis)**

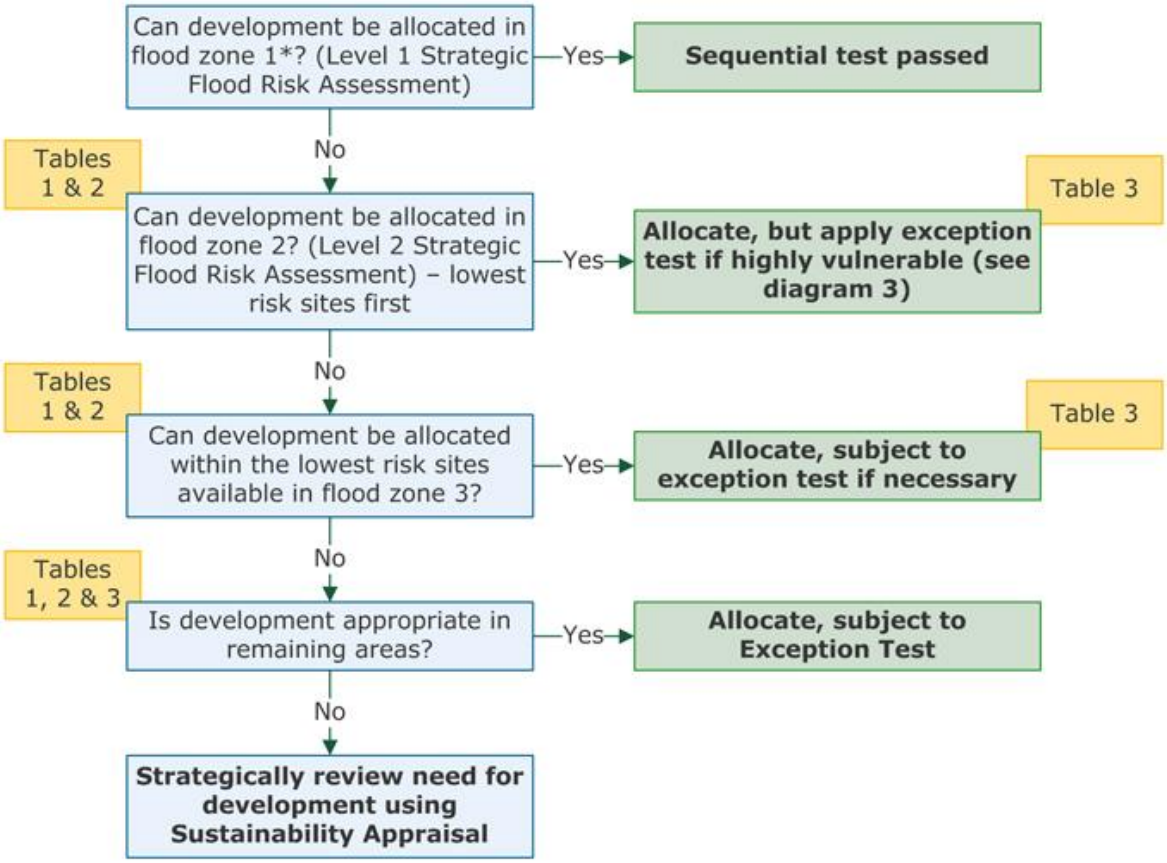
5.4 With regard to the preparation of Local Plans, the NPPG further explains that the sequential test is one of a range of planning considerations. It notes that:

'As some areas at lower flood risk may not be suitable for development for various reasons and therefore out of consideration, the Sequential Test should be applied to the whole local planning authority area to increase the possibilities of accommodating development which is not exposed to flood risk.'[4]

5.5 The NPPG acknowledges that in the preparation of a Local Plan, there will be occasions when **'other sustainability criteria outweigh flood risk issues'**.[5]

[2] National Planning Practice Guidance, Reference ID 7-018-20140306
[3] National Planning Practice Guidance, Reference ID 7-019-20140306
[4] National Planning Practice Guidance, Reference ID 7-020-20140306
[5] National Planning Practice Guidance, Reference ID 7-022-20140306

5.6 The approach to identifying suitable development sites through the Local Plan process is further explained in Diagram 2, which illustrates the application of the sequential test to meeting development needs through the Local Plan. Only where it is not possible to identify appropriate land through the application of the sequential and exception tests does this Diagram suggest that development needs may not be met. This Diagram is reproduced below.



NPPG, Diagram 2: Application of the Sequential Test for Local Plan preparation[6]

5.7 Note that this Diagram indicates that a Strategic Flood Risk Assessment (SFRA) is required in order to undertake a sequential test. The most recent SFRA for South Holland was produced in 2010, and it is a level 1 and level 2 assessment.

5.8 When applying the sequential test to planning applications, the NPPG notes that this is not necessary for development which has been allocated within a

[6] National Planning Practice Guidance, Reference ID 7-021-20140306

development plan. However, where the proposed development has not been allocated in the development plan, the NPPG offers the following guidance:

> **'For individual planning applications where there has been no sequential testing of the allocations in the development plan, or where the use of the site being proposed is not in accordance with the development plan, the area to apply the Sequential Test across will be defined by local circumstances relating to the catchment area for the type of development proposed. For some developments this may be clear, for example, the catchment area for a school. In other cases it may be identified from other Local Plan policies, such as the need for affordable housing within a town centre, or a specific area identified for regeneration. For example, where there are large areas in Flood Zones 2 and 3 (medium to high probability of flooding) and development is needed in those areas to sustain the existing community, sites outside them are unlikely to provide reasonable alternatives.**
>
> **When applying the Sequential Test, a pragmatic approach on the availability of alternatives should be taken. For example, in considering planning applications for extensions to existing business premises it might be impractical to suggest that there are more suitable alternative locations for that development elsewhere. For nationally or regionally important infrastructure the area of search to which the Sequential Test could be applied will be wider than the local planning authority boundary.'[7] (my emphasis)**

5.9 The NPPG also clarifies that it is for local planning authorities **'to consider the extent to which Sequential Test considerations have been satisfied',** and that**:**

> **'The developer should justify with evidence to the local planning authority what area of search has been used when making the application. Ultimately the local planning authority needs to be**

[7] National Planning Practice Guidance, Reference ID 7-033-20140306

satisfied in all cases that the proposed development would be safe and not lead to increased flood risk elsewhere.'

5.10 Residential development (excluding basement dwellings, which are not proposed here) is classified as a **'more vulnerable'** form of development.[8] Table 3 of the NPPG clarifies that **'more vulnerable'** development is **'appropriate'** within Flood Zone 2, but if it is to be located within Flood Zone 3a, the exceptions test would need to be passed. It is not appropriate within Flood Zone 3b.[9]

Summary

5.11 The above review of national policy and guidance concerning flood risk clarifies the following points in relation to the sequential test:

- Where development is **necessary**, and it cannot be accommodated on land within Flood Zone 1, the sequential test should be applied to find the most appropriate locations (NPPF, paragraph 100).
- The sequential test does not seek to prevent necessary development from taking place, but simply seeks to direct it to sequentially preferable locations, with regard to flood risk.
- A shortage of available land within Flood Zone 1 does not imply that necessary development should be restricted, but it should instead be located within the next sequentially preferable area, beginning with Flood Zone 2, and then moving on to Flood Zone 3a.
- When considering the suitability of sites for development, in the context of a Local Plan, national guidance recognises that other planning considerations may render some sites within Flood Zone 1 unsuitable for development, and that this may lead to development being located within Flood Zones 2 and 3a, where that development is necessary.
- For planning applications, the area within which the sequential test should be applied will be defined by local circumstances, relating to the catchment area for the type of development proposed. This may be

[8] National Planning Practice Guidance, Table 2, Reference ID 7-066-20140306
[9] National Planning Practice Guidance, Table 3, Reference ID 7-067-20140306

guided by Local Plan policies (or, we suggest, evidence supporting an emerging Local Plan), and the area in which development is needed in order to sustain local communities.

- Local authorities must consider the extent to which sequential test considerations have been satisfied, with regard to local circumstances. They must be satisfied that proposed development would be safe and not lead to increased flood risk elsewhere.

6 The Need for Housing

Settlement Hierarchy

6.1 As identified previously in Section 5, Policy SG3 of the adopted South Holland Local Plan (2006) identifies Holbeach as an Area Centre, the second tier within the settlement hierarchy after the Main Town of Spalding. The Policy states that Area Centres **'will continue to provide for housing, employment and commercial development to support their roles as service centres for surrounding rural areas.'** Holbeach therefore has an important role to play in the provision of housing within the District, as it is one of only 5 Area Centres, and is required to provide housing not only for the need arising within the town itself, but also in a wider rural hinterland.

6.2 The emerging South East Lincolnshire Local Plan (May 2013) takes a similar approach, identifying Holbeach as Main Service Centre, again in the second tier of the settlement hierarchy within the District.

Housing Target

6.3 It is relevant to note that, when developing policy options for the new Local Plan, paragraph 4.7.2 of the emerging Local Plan concluded that it would not be reasonable to consider a policy option which sought only to provide housing on land at the lowest risk of flooding, within Flood Zone 1, as this would be likely to lead to a fundamental challenge to the Local Plan, on the basis that it would fail to meet housing need.

6.4 This draft Local Plan recommended a housing target of 470 dwellings per annum, on the basis that this was considered achievable when compared against previous housing delivery rates. However, the Council's evidence has since indicated that higher migration-led dwelling forecasts may be preferable. Whilst these potential housing targets had originally been rejected as options, as they were not considered deliverable, we understand that the Council have since reconsidered this stance. As a consequence, the Council are now seeking to provide an annual average of 558 dwellings per annum, and this is the basis on which they have calculated their housing land supply. As this is the most up to date housing target available, we have used it as a basis for this report.

6.5 With regard to affordable housing, we also note that the latest draft Peterborough Sub-Region Strategic Housing Market Assessment, published March 2014 (referred to as the SHMA) indicates a very high level of need. Table 47 of the SHMA indicates that there is a need for 521 affordable homes each year throughout the new Local Plan period, to 2036. This is nearly as high a number as the Council's overall housing target, and so it is not a realistically deliverable target. As the proposed housing target will not meet affordable housing needs, any provision that can be made towards this need is of great value. This also suggests that the Council's target of 558 dwellings per annum should realistically be considered a minimum, particularly where development proposals can deliver affordable housing.

Housing Land Supply

6.6 The Council's published housing land supply[10] sets out the following conclusions:

A	Housing target for plan period (2011 – 2036)	13950
B	Annual housing target across plan period (A / 25 years)	558
C	Five year supply target, no adjustment (B x 5)	2790
D	Shortfall in housing provision from earlier in plan period (requirement less completions)	1054
E	Five year supply target incorporating shortfall (C + D)	3844
F	Buffer (5% or 20%)	769
G	Five year supply incorporating buffer (E + F)	4613
H	Annual target for next five years (G / 5)	923
I	Current deliverable supply 2014/15 – 2018/19	2675
J	Gap (G – I)	1938
K	**Council's housing land supply equivalent to (I / H)**	**2.9 years**

[10] See *NPPF 6 Year Housing Land Supply Assessment for South Holland District as at 31 March 2014*, South Holland District Council (2014), available at http://southeastlincslocalplan.org/housing/.

6.7 Therefore, on the basis of the Council's own calculations, there is a shortfall in the current housing land supply of 2.1 years, equivalent to 1,938 dwellings. This shortfall applies across the District, and the guidance in the NPPF noted in Section 2 states that it implies policies for the supply of housing should be considered out of date. This effectively means that policies which seek to restrict residential development to the defined limits of settlement boundaries, including Policies SG4, HS4 and HS7 of the adopted Local Plan (2006), are out-of-date and should be accorded relatively little weight, when considered against the importance which the NPPF paces on meeting housing need. Therefore, sites such as the application site may be considered suitable locations for residential development.

6.8 In terms of meeting this shortfall, we note from the Council's latest available annual monitoring report that only 25 dwellings have been completed in Holbeach in the period 2011 to 2014[11]. We also note that the Council's recent housing land supply assessment sets out the details of each of the sites from which housing is expected to be delivered within the 5 year period. This includes a supply of around 280 dwellings in Holbeach.

Housing Target for Holbeach

6.9 The wider policy guidance in the NPPF supports development in sustainable locations, with good access to public transport and local services and facilities. In this regard the policies of the adopted Local Plan relating to settlement hierarchy remain consistent with the policy approach advocated by the NPPF, and they can be accorded full weight. Holbeach is one of the most sustainable locations for development within the District, as reflected in its identification within the second tier of the settlement hierarchy within the adopted and emerging Local Plans.

6.10 The emerging Local Plan proposed to allocate 1000 dwellings to be delivered in Holbeach in the period 2011-2031, of which no more than 900 may be located in ROY zones. ROY zones are identified by the Lincolnshire Coastal Study (2010) which categorises four main coastal flood zones according to their degree of

[11] See "Figure 9: Urban and Rural Housing Completions in South Holland District (2004/05 - 2013/14)" of the SOUTH EAST LINCOLNSHIRE MONITORING REPORT 1st April 2013 – 31st March 2014 available at http://southeastlincslocalplan.org/wordpress/monitoring/

hazard[12]. The current policy approach is to cap development in the hazardous Red, Orange and Yellow (ROY) zones, however we understand from discussions with the Council's Planning Policy Manager that this cap will be removed from the next version of the plan.

6.11 The identified allocation for Holbeach, which represents 10.6% of the overall housing requirement, is recognised in the plan as a modest increase in the proportion of the District's housing growth compared with recent experience in housing completions (i.e. Holbeach has accommodated some 7% of the dwellings built in South Holland District). The plan identifies that this reflects Holbeach's status as South Holland District's second largest settlement and the availability of non-ROY land for development.

6.12 If this level of growth is increased in proportion with the new higher housing target that the Council are now seeking to meet, and the longer plan period now referenced in the Council's 5 year land supply assessment (to 2036, in accordance with the SHMA's calculations), the target for Holbeach in the period 2011-2036 would increase to up to 1,480 dwellings, of which no more than 1,330 (90%) may be located in ROY zones (if a cap on development in ROY zones were to remain).

6.13 The evidence of potential housing land in Holbeach on which the emerging Local Plan is based is formed by the 2012 SHLAA. This contains Officers' assessment of the availability, achievability and suitability of sites which have been promoted for development, in accordance with the requirements of the NPPF (see NPPF, footnote 11). The conclusions of the SHLAA must therefore also be read in conjunction with the initial conclusions of the emerging Local Plan, which were that the proposal to allocate 10.6% of the overall level of housing growth proposed in Holbeach (1,000 dwellings) **'is supported by evidence of available sites in the SHLAA'**[13].

Discussion

6.14 The evidence noted above demonstrates that there is a substantial need for housing across the District in the short-term, and that the NPPF places

[12] Geographical areas coloured red are considered to be Danger for All; orange - Danger for Most; yellow - Danger for Some; Green – low hazard.
[13] Draft South East Lincolnshire Local Plan, May 2013, paragraph 6.39.1

considerable importance on meeting this shortfall. It is also clear that there is an identified need for a substantial quantum of residential development, potentially in the region of up to 1,480 dwellings, to meet the identified future need for housing in Holbeach. The emerging Local Plan has also already concluded that it would not be reasonable to seek to restrict residential development only to land within Flood Zone 1, as this would fail to meet housing need.

6.15 The proposed development would provide 48 dwellings, a number which we believe represents a significant and valuable contribution to meeting local housing need in Holbeach.

6.16 The proposals would also provide 16 affordable homes, which is 33% of the total number proposed, consistent with the requirements of the adopted Local Plan (Policy HS8) and the emerging Local Plan. As noted above, the need for affordable housing is significantly greater than could be met by the Council's proposed housing target, and so this provision will be of great value in providing housing for those in the greatest need.

6.17 We therefore believe it is clear that there is a demonstrable need for housing in Holbeach. As such, the residential development proposed by this application is necessary, and meets the test at NPPF paragraph 100.

7 Consideration of Potential Development Sites

7.1 As noted above, paragraph 100 of the NPPF allows for development to be accommodated within Flood Zones 2 and 3, where it can be shown that the development is necessary, and subject to the sequential and exception tests. We believe that the evidence set out above clearly demonstrates that there is a great and pressing need for housing, and particularly in Holbech, which is one of the more sustainable locations in the District, and that such development is therefore clearly necessary.

7.2 As noted in Section 5 above, the sequential test requires a consideration of reasonably available sites. We understand that the Draft Strategic Housing Land Availability Assessment (SHLAA), dated 2012, forms the Council's most recently published assessment of reasonably available sites for residential development around Holbeach. We have therefore considered the potential which the sites identified in the published draft SHLAA have to meet the need for residential development in Holbeach when judged against the application site. In doing so we have focused on sites within and adjacent to Holbeach as we consider these sites to be relevant for the purposes of addressing the identified need for Holbeach in the emerging Local Plan. We have therefore not considered SHLAA sites identified in Holbeach Drove, Holbeach Hurn, Holbeach St Johns and Holbeach St Marks as these are all rural settlements remote from Holbeach. We have also excluded site reference Hob005 (land to the east of Penny Hill Road, Holbeach), as since the draft SHLAA was published, this site has been granted planning permission for 30 homes (ref H09-0789-11). This has therefore been accounted for within the Council's recent housing land supply assessment mentioned above.

Consideration of SHLAA Sites in Relation to Flood Risk

7.3 The sites identified in the SHLAA are shown on Drawings 1320/1327/02 and 1320/1327/03. Drawing 1320/1327/02 shows the sites in relation to the Environment Agency's flood map. This flood map forms the starting point for carrying out a sequential test, and is included here for completeness. It indicates that only a small part of site Hob002 lies within Flood Zone 2, and the remainder of the sites in the vicinity of Holbeach lie either entirely or mostly within Flood Zone 3a.

7.4 Drawing 1320/1327/02 shows the SHLAA sites in relation to the Council's Strategic Flood Risk Assessment (SFRA) from 2010. This is a more refined assessment of flood risk, and the NPPF and its technical guidance indicate that where available the SFRA should be the basis for undertaking the sequential test. This drawing indicates that a larger part of the area within the town centre and to the southwest of the town is within Flood Zone 1, and so at a lower risk of flooding. Almost half of site Hob002 is now shown as lying within Flood Zone 1. Meanwhile, small parts of Hob006, Hob010 and Hob011 are now within Flood Zone 2.

7.5 Whilst the SFRA indicates that less of Holbeach is at risk of flooding, this does not have a significant impact on the potential number of dwellings that can be delivered in SHLAA sites outside of Flood Zone 3a. Based on an average density of 40 dph, the section of Hob002 within Flood Zone 1 (7.4ha) appears capable of delivering around 180 dwellings (assuming a plot coverage of around 60%). Given the limited extent of flood zone 2 within Hob006, Hob010 and Hob011, it is more difficult to identify the potential number of dwellings that could be delivered outside of zone 3 in these sites, but it is unlikely to be more than 40. Therefore, given the need for up to 1,480 dwellings to be delivered in Holbeach, it is clear that it will be necessary to allocate land for residential development within Flood Zone 3a.

Further Material Planning Considerations

7.6 The Council's assessment of the SHLAA sites considered a broader range of planning criteria to flood risk alone. This assessment is summarised in the table below, which shows that 7 of the sites within or adjacent to Holbeach are considered by the SHLAA to be available, achievable and suitable, and that these sites could between them deliver 1,185 dwellings (based on the Council's assessment of the capacity of each site). Considering these figures in the context of the emerging Local Plan, it is also clear that a number of SHLAA sites will be required which do not meet the Council's assessment of being available, achievable and suitable sites, if housing need is to be met.

7.7 The table below considers broader planning considerations such as landscape impact, as well as the issues of availability and deliverability considered by the SHLAA. It takes the SHLAA assessment further by considering the sites in the context of their suitability for development immediately. We have categorised any site which is not immediately available as being currently undevelopable.

	SHLAA Conclusion						JBPA Conclusion	
Site	**Available**	**Achievable**	**Suitable**	**Classification**	**No. of Dwellings identified in SHLAA**	**Flood Zone (SFRA)**	**Notes**	**JBPA Classification**
Hob002	Yes	Yes	Yes	Developable	425 (note, that an application is currently under consideration for 900 dwellings)	Mixed 1, 2 and 3	Adjacent edge of settlement and well related to existing properties and the town's range of services.	Developable
Hob003	Yes	Yes	No	Undevelopable	16	3	Adjacent edge of settlement and well related to the existing residential properties. Appropriate in scale to the town's range of services and can be developed with little harm to the area's character. Landscape is heavily influenced by the urbanising influences of the adjacent residential development to the south and the A17 to the north, and so development would not be incongruous.	Developable
Hob004	Yes	Yes	Yes	Developable	109 (note, this application is for 48 dwellings within the southern part of the site)	3	Adjacent edge of settlement and well related to the existing residential properties. Appropriate in scale to the town's range of services and can be developed with little harm to the area's character. Landscape is heavily influenced by the urbanising influences of the adjacent residential development to the south and the A17 to the north, and so development would not be incongruous.	Developable
Hob006	Yes	Yes	Yes	Developable	585 (allocated as part of an urban extension for 450 homes in the South Holland Local Plan 2006. Hob013 also forms part of the same allocation)	Mixed 1, 2 and 3 (majority zone 3)	Poorly related to the edge of the settlement and existing residential properties. Although allocated in the Local Plan 2006, the lack of progress with bringing the site forward in the 8 years since adoption of the Plan also suggests a fundamental problem regarding the deliverability of the site.	Undevelopable
Hob007	Yes	Yes	No	Undevelopable	426	3	Would extend Holbeach to the west of the A151, in a highly visible location. Significant adverse landscape impact and poorly related to the form of the existing settlement.	Undevelopable
Hob008	Yes	Yes	Yes	Developable	6	Mixed 2 and 3	Adjacent edge of settlement and well related to the existing residential properties. Appropriate in scale to the town's range of services and can be developed with little harm to the area's character.	Developable
Hob009	Yes	Yes	No	Undevelopable	21	3	Taken on its own the site is not adjacent to the town's built up area. However, if the application site was developed then its relationship to the town would be acceptable.	Developable

Hob010	Yes	Yes	Yes	Developable	16	Mixed 2 and 3	Majority of site is brownfield land. Its redevelopment would cause little harm to the area's character, particularly if Hob002 is developed.	Developable
Hob011	Yes	Yes	No	Undevelopable	70	Mixed 2 and 3	An irregular shaped site which projects into countryside and would not form a logical extension to the settlement.	Undevelopable
Hob013	Yes	Yes	Yes	Developable	39 (allocated as part of an urban extension for 450 homes in the South Holland Local Plan 2006. Hob006 also forms part of the same allocation.)	3	Taken on its own the site is well related to the edge of the settlement and existing residential properties. However, it is allocated as part of an urban extension in the Local Plan 2006, and the lack of progress with bringing the site forward in the 8 years since adoption of the Plan suggests a fundamental problem over the deliverability of the site.	Undevelopable
Hob015	Yes	Yes	No	Undevelopable	11	3	Not connected to edge of settlement	Undevelopable
Hob017	Yes	Yes	No	Undevelopable	7	3	Not connected to edge of settlement	Undevelopable
Hob018	Yes	Yes	No	Undevelopable	3	3	Not connected to edge of settlement	Undevelopable
Hob021	Yes	Yes	No	Undevelopable	3	3	Not connected to edge of settlement	Undevelopable
Hob023	Yes	Yes	Yes	Developable	5	3	Located within town's built up area. Appears suitable for development	Developable
Hob024	Yes	Yes	No	Undevelopable	28	3	Not connected to edge of settlement	Undevelopable
Hob025	Yes	Yes	No	Undevelopable	19	3	Not connected to edge of settlement	Undevelopable
Hob026	Yes	Yes	No	Undevelopable	42	3	Taken on its own the site is not adjacent to the town's built up area. However, if the application site was developed then its relationship to the town would be acceptable.	Developable

7.8 The table indicates that, when considering developable sites in Holbeach, only part of Hob002 could deliver housing outside of Flood Zones 2 and 3. We have established that this area could deliver only approximately 180 homes. This level of development would fall far short of meeting the level of housing needed either to make up the shortfall in the housing land supply, or to meet the need for housing in Holbeach in the new Local Plan period.

7.9 The application site forms part of Hob004, which is one of the sites within Flood Zone 3 which we believe to be developable. With regard to the SHLAA figures, the 8 sites which we have identified as developable could between them deliver 577 dwellings[14]. If this figure is adjusted to take account of the number of dwellings proposed in the planning application which is currently under consideration for Hob002, then 1,052 dwellings may be delivered.

7.10 It is therefore evident that it will be necessary for all of the developable sites we have identified to come forward for residential development, and other sites beside, if the identified need for housing in Holbeach over the plan period is to be met (i.e. 1,480 dwellings). Given the immediate need for housing to meet the shortfall in the 5 year housing land supply, and the low level of supply of housing in Holbeach, we believe that it would be of great benefit if any of these sites were to provide housing in the short-term. We therefore believe that the application site, as one of only a few developable sites in the town, is required to meet immediate housing need, and so its development is necessary; we therefore believe it passes the sequential test.

[14] Note that in the case of Hob009 and Hob026 which form parts of Hob004, we have only considered the capacity identified in the SHLAA for Hob004 (i.e. 109 dwellings).

8 Achieving Sustainable Development

8.1 We have noted, in the Planning Policy Review carried out in Section 5, the substantial emphasis which the NPPF places on the need to ensure that new development is sustainable. The NPPF repeatedly reinforces this message, stressing for instance the importance of boosting significantly the supply of housing, and the social and economic needs which new development, including housing, can serve.

8.2 The NPPF sets out economic, social and environmental roles for the planning system, in order to achieve sustainable development, and we consider the application proposals under these themes below.

An Economic Role

Housing to Support the Economy

8.3 The Framework recognises that new housing has a role to play in sustainable economic development. Paragraph 17, which sets out the Framework's 'Core Planning Principles' confirms the link between new development, including housing, and economic sustainability. Paragraph 21 of the NPPF identifies that a lack of housing can be a barrier to investment and so economic sustainability.

8.4 The proposed housing has a role to play in helping to support the local economy in Holbeach. One way in which it does this is by providing housing for the local work force. A range of types of housing are required in order to meet the needs of the whole workforce, and make an area attractive for them to live in. Where housing needs are not met, this has a strong influence on the affordability of housing, and thus where people choose, or are able to live. In turn, this has an influence on businesses which choose, or are able to locate in a particular place. As a reflection of the need for a diverse mix of housing, paragraph 159 of the Framework requires local planning authorities to plan to meet the demand for all types of housing.

Boosting Local Trade

8.5 Housing helps to support the local economy by increasing the demand for local shops and services within the town. There is a long-term trend of decline in many

high streets, and Holbeach's town centre has witnessed its share of vacant shops. This trend is caused by a number of factors, including changing consumer preferences, a rise in online shopping and tendency to travel to specialist retail centres. This effectively means that over time a larger local population is required in order to sustain a similar level of services and facilities. By providing new housing and additional trade, this application will therefore provide a boost to the local economy, helping to ensure the future prosperity of shops and services.

Creating Employment

8.6 The jobs which the construction of housing would provide are also worthy of note. A development of 48 houses, plus the necessary supporting infrastructure, can typically be expected to provide employment for around 50 - 60 people for the duration of its construction, i.e. circa 18 months. The Applicant intends to build the site out themselves, and it is likely that many of these people will come from the local area, and all workers are also likely to contribute to the local economy through spending whilst they work on the site.

8.7 The proposed residential development would therefore provide a short-term boost to the economy by increasing demand for services and facilities, and it would also make a valuable contribution to its long-term sustainability through the provision of market and affordable housing to help accommodate the local workforce.

A Social Role

Meeting Housing Need

8.8 We have noted in section 6 that there is a substantial need for housing across the district. The longer the recent under-supply remains unaddressed, the greater the long-term negative social impacts will be. For example, a lack of housing for young people can stifle ambition, career goals and family plans. It can also lead young people to leave the area, in search of suitable housing and employment.

8.9 Housing is one of the fundamental elements of the social aspect of sustainable development envisaged by the Framework. Helping to meet the need for housing makes a significant contribution towards the social sustainability of the local community by providing suitable housing for a greater number of people, and

helping to improve the overall affordability of housing. In this way, the application makes a very significant contribution towards the social sustainability of the local area.

Providing a Range of Types of Housing

8.10 Social sustainability also requires new residential developments to provide a range of house types and sizes to meet the needs of the local population. The proposed development would provide starter homes for first-time buyers, intermediate and family homes and affordable housing, which includes specialist housing for the elderly. The wide variety of housing proposed will help to meet the needs of many local people.

High Quality Built Environment

8.11 Beyond the general provision of housing, it is also important that new residential neighbourhoods are designed and built to a high standard. The Design and Access Statement which accompanies this application describes the approach which has been taken in the design of the development, and the way in which it is intended to meet the needs of its residents, to create a pleasant, attractive and functional environment in which people will enjoy living.

8.12 It can therefore be seen that the proposed development would make a vital contribution towards the social sustainability of the town and the local area by helping to meet housing need, within a high quality built environment.

An Environmental Role

Increasing Biodiversity

8.13 Where possible existing vegetation on the boundaries of the site is to be retained and enhanced through landscape planting. A substantial number of new trees would also be planted, as well as a new area of open space, both of which will provide potential new habitats. Whilst the details of the new planting are yet to be agreed with the Council, it is proposed that it should be of native species.

Minimising Waste and Use of Resources

8.14 The proposed development has been designed so as to minimise waste and pollution, and the use of natural resources. The Sustainability Statement, which accompanies this application, describes how the housing will benefit from a high level of thermal and water efficiency, in order to meet the requirements of building regulations.

Minimising Carbon Emissions

8.15 Where possible, it is necessary to minimise the carbon emissions which can be generated through transport, and particularly from private car trips. The proposed site lies to the north-east of the town with shops, services and public transport links within walking and cycling distance. Further details in this regard are set out both in the Sustainability Statement and Transport Assessment which accompany this application.

The Flood Risk Exception Test

8.16 Having identified in the previous section that the proposed development passes the Sequential Test, given that the development is necessary and it is not possible for it to be located in zones with a lower probability of flooding, it is therefore necessary under the Exception Test to consider whether the wider sustainability benefits outweigh the potential risk of flooding. We believe that the various benefits set out above demonstrate that this element of the test is met.

8.17 A site-specific flood risk assessment (FRA) has been prepared by Geoff Beel Consultancy, which demonstrates that the proposed development is within a defended floodplain, and thus has a very low risk of flooding given current standards of protection. Additional mitigation measures, including a proposed soakaway drainage system and flood resilient construction methods, will offer additional protection against impacts arising from any extreme short duration, localised events.

8.18 In view of the findings of this FRA, and the wider sustainability benefits of the proposal identified in this section, we believe that the exception test is passed.

9 Conclusions

9.1 This Supporting Planning Statement has been prepared in support of a planning application for the construction of 48 dwellings on land to the east of Balmoral Way, Holbeach. The report has considered the planning aspects of the proposal in the context of the NPPF's flood risk sequential and exception tests.

9.2 The sequential test seeks to direct development towards areas with the lowest risk of flooding, but it allows for development to take place within Flood Zones 2 and 3a, where that development is necessary, provided that there are no other reasonably available sites at a lower risk of flooding, which could meet the identified need for development.

9.3 We have established that there is a substantial need for housing in the District and within Holbeach. There is currently a significant shortfall in the 5 year housing land supply, of nearly 2,000 dwellings across the District, and the NPPF places great importance on making up this deficit as soon as possible. In addition, the Council's emerging Local Plan indicates it will be necessary to provide at least an additional 1,000 dwellings in Holbeach to meet current and future housing needs, and this figure appears set to rise to 1,480 or more. Meanwhile, the need for affordable housing indicates that this target should be considered a minimum. The emerging Local Plan seeks to meet this need from sites in the SHLAA, and it also concludes that residential development should not generally be restricted to sites within Flood Zone 1, as this would imply that it would not be possible to meet housing need.

9.4 The current supply of housing in Holbeach amounts to only 280 dwellings. We conclude that there is no doubt that residential development is necessary in Holbeach, and the 48 dwellings which are proposed by this application, of which 16 would be affordable housing, would make a significant and valuable contribution to meeting housing need in the area.

9.5 The SHLAA represents the most reliable and comprehensive source of potentially available development sites. Of the sites identified within the SHLAA, we believe that there are only a small number which are reasonably available and developable within Holbeach. All of these sites, and more beside, would be required to meet the level of housing required by the emerging Local Plan.

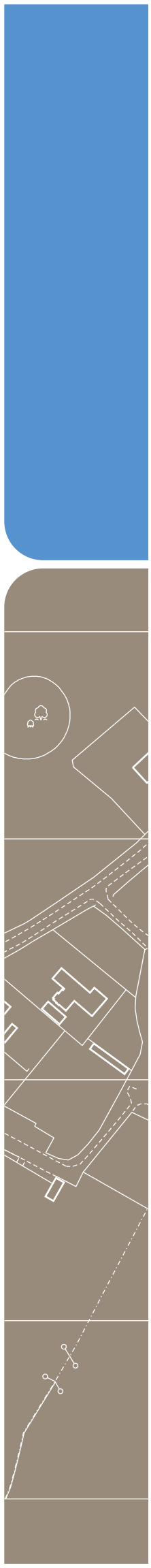
9.6 Given the immediate need for housing to meet the shortfall in the 5 year housing land supply, and the low level of supply of housing in Holbeach, we believe that it would be of great benefit if any of these sites were to provide housing in the short-term. Seeking to restrict development only to sites within Zone 1 would fail to meet either the current or future need for housing.

9.7 We believe that the application site, as one of only a few developable sites in the town, is required to meet immediate housing need, and so its development is necessary. We therefore believe it passes the sequential test.

9.8 We have also demonstrated in this Supporting Planning Statement, and the accompanying application documents, that the proposal would deliver a sustainable form of development with any unacceptable adverse impacts. We consider that the wider sustainability benefits identified clearly outweigh the risk of flooding, which as demonstrated through the accompanying Flood Risk Assessment has been addressed through existing flood defences and additional mitigation measures proposed in the application. We therefore also consider the exception test is passed.

9.9 Therefore, in accordance with the presumption in favour of sustainable development, the proposed development should be approved without delay.

TW/1320/JPD
4 February 2015



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